

22/0914/LDO | Land Development Order for land off Long Lane, Clyst Honiton

Dear planning team,

Exeter Cycling Campaign would like to register a neutral response to this application. Several items in the Framework Travel Plan are to be applauded. At this stage it's not clear what are suggestions and what are fully committed and funded proposals. Furthermore, given this development order is for the site as a whole, it will be important to place conditions upon site occupiers to ensure the aims of the travel plan are achieved. We would like to be in a position to support this application as it moves forward if commitments (and funding where necessary) are made clearer.

We welcome the assertion that the travel plan's primary objective is to reduce single occupancy car journeys and note that the travel plan states "there is an opportunity to decrease single car occupancy car trips by around 5% in the first 5 years". It's not clear where this target comes from but Exeter Cycling Campaign asserts this is highly unambitious. In 2019 East Devon District Council, amongst others, declared a climate emergency, and many plans to decarbonise have targets of 2030. With less than 8 years until this date and transport providing around 31% of East Devon's emissions, greater ambition is needed, in line with others such as wider plans in and around Exeter for 50% of short journeys to be made by walking or cycling. There is an opportunity here to make big inroads in the modal shift out of private cars that must not be missed.

To achieve this it is important to not only encourage people to travel by cycling and walking but to enable them. There are some useful soft measures mentioned in the travel plan, including creation of a Bicycle Users Group, information sharing including maps, provision of pool bikes and a Dr Bike service. However a meaningful modal shift will also require investment in quality infrastructure that meets the needs of site users. We refer several times to the government's LTN 1/20 document as this gives excellent guidance on most aspects of what is needed.

We would like to draw particular attention to some areas where clarity or more firm commitments are needed.

1) We welcome the inclusion of "Covered and secure cycle parking spaces located as close to the entrances to buildings as possible". However, the plans only show 3 units with dedicated cycle storage. Furthermore, we note that the indication is that the number "will be provided in the range 1 space per 250sq.m. GFA to 1 space per 500sq.m. GFA." It's not clear how many total spaces this will equate to and if that is suitable to meet the expected occupancy of the site for both members of staff and customers/visitors. Therefore we request that there is a commitment to secure covered cycle parking as close to the entrance as possible for each unit and that the number of covered and secure cycle parking spaces is re-calculated to meet expected occupancy. Assurance is also needed that they will be designed and provided to meet the standards given in LTN 1/20, including for non-standard cycles, ensuring inclusivity in particular for disabled cyclists (e.g. using modified cycles or hand bikes or simply requiring more manoeuvring space) and parents (e.g. with trailers attached or using cargo bikes). LTN 1/20 provides excellent guidance in this area. We note that section 2.6 fails to recognise the importance of cycling for mobility and access for people with disabilities.

2) The travel plan states that "A link on foot and by cycle between the proposed development site and the areas west of the site is provided by a combination of footways, footpaths and areas of shared surface within the airport car parks."

The airport carparks section was opened in 2012 and since then no noticeable maintenance or assessment of its usability has been undertaken. The shared surface within the airport car parks currently falls well below minimum standards. The surface itself is poor and poorly maintained and the route through the car parks is difficult to navigate in places and places users in conflict with motor vehicles. We note there are plans to improve footway provision stated and would expect this development to also contribute to improving the cycleway provision, however the only mention of this is in the "example travel plan measures" which state "Improvements to the local walking and cycling network". Consideration should be given to mandating a contribution from the development as a whole and site occupiers to upgrade the surface and routing of the connecting cycleway through the airport car parks, avoiding shared use surfaces wherever possible, and ensuring all parts all the way to the new site are LTN 1/20 compliant.

3) We note that access for people cycling and walking is intended to be shared with access for people driving. "Access to the proposed development site will be available to pedestrians, cyclists, cars and commercial vehicles via a new simple priority junction with Long Lane towards the western end of the site frontage."

This is not a very safe way to provide this access, particularly given the expectation that the site will be used by HGVs. We would request that you provide segregated safe access for people cycling and walking if at all possible. If no opportunity is available to do this then the junction with Long Lane must be assessed using the Junction Assessment tools (JAT) laid out in LTN 1/20 and there must be no RED red-scored turning movements. In addition, all roads within the development must meet the standards laid out in LTN 1/20 (para 1.1.2 and appendices A & B). Namely, using the Cycling Level of Service (CLoS) tool, roads must score over 70%

4) We welcome the assertion that "The development will also offer a minimum of one shower facility to all business units which encourages cycling and walking to work". It's not clear how many showers are provided by one "shower facility". The number of showers should be provided based on calculations of expected building occupancy, ensuring sufficient showers for all genders are available. In addition, clothing drying facilities and lockers would be highly effective in increasing the number of people using cycling as their main commuting method and should be included in each unit.

If the application were to be amended to clarify and commit to the points given above, the Exeter Cycling Campaign would be delighted to be able to support this development.

Yours sincerely, Helen Mako-Yule for and on behalf of: EXETER CYCLING CAMPAIGN

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