

## **17/0461/03: Land adjoining Omaha Drive and Blakeslee Drive. Construction of ground floor Retail Unit (218m<sup>2</sup> gross internal floor area) and 20 residential apartments with associated amenity space, parking and associated works, and provision of an additional 20 parking spaces for use in conjunction with Newcourt Community Centre.**

12th April 2017

Dear Michael

Exeter Cycling Campaign have reviewed the submitted application documents and offer the following comments. Policies and guidance contained within the following local and national documents are particularly relevant:

- Exeter Core Strategy 2012 (policies CP9 and CP17 in particular)
- Sustainable Transport SPD 2013.
- Residential Design Guide SPD 2010
- Newcourt Area Masterplan
- NPPF (in particular chapters 7 and 8)
- Manual for Streets (MfS)

\* We note the applicant makes reference to Government Planning Policy Statements in the Design and Access Statement, though PPSIs were cancelled in 2012 and carry no status in the planning system.

Comments below should be read in conjunction with Drawing RNSD-SK200 Rev P6 submitted with the application.

### **Retail: Cycle Parking Quantity and On-Street Parking Orientation**

No cycle parking provision is proposed for staff or customers of the retail unit. The cycling parking standards set out at Table 2 of the Sustainable Transport SPD require a minimum of 4 staff spaces and 10 customer spaces i.e. a cumulative minimum of 14 spaces. Paragraph 5.1.4 of the SPD states that “*Newbuild properties will **always** be expected to include cycle parking in accordance with the policy requirement*”. Provision for customers should be located adjacent to the entrance of the proposed store and ideally should be covered.

The space outside the retail unit does not appear to conform to ‘Home Zone’ principles. On this basis, the proposed 11 on-street car parking spaces in front of the retail unit should be re-oriented to be perpendicular rather than right angle spaces to conform with the Residential Design Guide SPD – paragraph 6.33 notes that “*Right angled parking has the potential to maximise parking provision on street but usually at the cost of good townscape and the quality of pedestrian space (Figure 6.13). Right angled parking may be acceptable as part of a home zone design but without the home zone approach will not normally be acceptable*”.

## Residential: Cycle Parking Location

We welcome the provision of 20 cycle parking spaces for residents of the apartments, though note that no visitor parking is proposed. Furthermore, the bike store is poorly located and does not comply with the Sustainable Transport SPD (section 5.2), Residential Design Guide SPD (section 6.3) or DCC's Cycle Parking Design Guide. To cite just one of these documents, the Residential Design Guide SPD states in the preamble to section 6.53 that:

*"...parking should be covered, discourage anti-social behaviour, be safe and convenient".*

Section 6.59 further states: *"The first choice location for cycle parking for flats is within the building, either in a ground floor communal area close to the main entrance, under stairs or in underground or semi-basement areas..."* (Figure 6.26)."

However, the proposed bike store is located at some distance from the apartments and is contained in a narrow space with blank elevations on all sides, including bin stores. There is no natural surveillance, which poses a risk in terms of antisocial behaviour, theft from the store and potentially a perceived threat to personal safety which will discourage use, regardless of actual crime figures for the area.

Secure provision should instead be provided within the two ground floor communal areas illustrated on Drawing RNSD-SK200 P6 (minimum 10 per lobby), as required by the Residential Design Guide SPD, along with one or two ad hoc spaces for visitors outside the two building entrances. If the applicant is not willing to amend their plans to facilitate this policy requirement, Exeter Cycling Campaign suggests provision of a high quality cycle storage compound at the centre of the site that benefits from both closer proximity to the apartments and better natural surveillance than the current proposals. Being in a more visible location will require the shelter to be of a high design quality so as to contribute to the visual amenity of the area.

## Community Centre: Covered Cycle Parking Provision

Given there are only 6 uncovered Sheffield cycle stands outside Newcourt Community Centre at present, Exeter Cycling Campaign suggest provision of additional covered Sheffield stands to match the proposed additional car parking spaces. These should be located as close as possible to the Community Centre and in clear sight of the main entrance. Consideration should also be given to provision of electrical infrastructure to facilitate a Co-Bikes (e-Bikes) docking station (and potentially electric car charging points.) given the status of this node as a community hub.

## Placemaking/Manual for Streets

Notwithstanding the above comments, the design of the proposed development does not fully conform with policy CP17 (Development at Newcourt), Manual for Streets (MfS) or the NPPF in relation to the quality of the urban environment and placemaking. Section 5.7 (Designing Streets as social spaces) of MfS states that:

*"The public realm should be designed to encourage the activities intended to take place within it. **Streets should be designed to accommodate a range of users, create visual interest and amenity, and encourage social interaction.** The place function of streets may equal or outweigh the movement function, as described in Chapter 2."*

Paragraph 68 of the NPPF states, inter alia, that planning decisions should achieve places that promote: *"opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, **strong neighbourhood centres and active street frontages** which bring together those who work, live and play in the vicinity"; and, "safe and accessible developments, containing **clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas"**.*

The proposed design is dominated by on-street vehicle parking and at the junction with the main spine road for Newcourt, Admiral Way/Omaha Drive. The existing junction of Blakeslee Drive and Omaha Drive does not encourage vehicles to slow down or give priority to pedestrians and cyclists. This is particularly disappointing as most pedestrians

will be crossing from the opposite side of Omaha Drive given the lack of a footway on the east side, and most cyclists will be turning into Blakeslee Drive from the road carriageway. Exeter Cycling Campaign have previously commented on the issue of excessive vehicle speeds along the main Newcourt spine road in response to application 17/0006/03.

The 'public amenity space' proposed is located between the rear of the apartment buildings, residents car park, and retail unit. It is therefore invisible from the main street frontage and Community Centre and unlikely to be seen as a focal space for the community. No public square or equivalent hard landscaped space is made available for community use during wetter months.

Overall, there is no sense that the site forms one of the 3 "key nodes" for community facilities identified in the Newcourt Area Masterplan. The design of such nodes should give them prominence in the townscape and facilitate and actively encourage dwell time and social interaction throughout the year. Exeter Cycling Campaign suggest that in order to be fully compliant with adopted local policy, MfS and paragraphs 58, 64 and 69 of the NPPF in this regard, the proposals should be revised to put greater emphasis on sustainable access and high quality usable public space, in the interest of sustainable development.

Kind regards,

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for and on behalf of:

**EXETER CYCLING CAMPAIGN**

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