

19/0534/FUL - Site off Alphinbrook Road and Hennock Road North, Marsh Barton Trading Estate

(Travis Perkins (Properties) Limited)

06 June 2019

Dear Zulema,

Exeter Cycling Campaign welcomes the opportunity to respond to the planning application that is referenced above.

Having given the proposed development careful consideration Exeter Cycling Campaign **objects** to this development, for the following reasons:

- The number of cycle parking spaces fails to comply with Exeter Sustainable Transport SPD standards.
- The overall area for cycle parking is inadequate to accommodate cargo cycles and support inclusive cycling
- The restricted location of cycle parking at Plot 1 is likely to promote conflict between cycles, cars, pedestrians and goods movements.

Failure to correctly address these issues will effectively result in under-provision of cycle parking required to meet needs generated by the proposed development and would undermine the development's Travel Plan which has the declared aim of "*minimising car-based travel to and from the site*".

Cycle Parking

Cycle parking at this site is especially relevant to the overall Travel Plan for this site given the proximity of traffic-free cycle Route 34 along Exeter Canal and also sections of (unfortunately disjointed) traffic-free routes between the site and St Thomas and the southern edge of Marsh Barton trading area.

We note that the Design & Access Statement para 3.04 describes access and layout with regard to cycling provision for Plot 1 as follows;

"Parking for 27 staff members and a cycle shelter with four cycle hoops for staff to use is located at the rear of the proposed building and can be accessed from the existing access at Grace Road Central."

And for Plot 2;

"A cycle shelter for customers with four cycle hoops is also provided ..."

Provision of covered cycle parking shelters is welcomed. However, a number of improvements are recommended to achieve the best quality of provision that will;

- Ensure that adequate facilities are available for those who already cycle
- Encourage more people to cycle
- Reduce obstruction and other nuisance caused by ad-hoc parking
- Accommodate all types of cycle including cargo cycles at this retail facility, and inclusive cycling

1. Provide additional cycle parking

The number of cycle parking spaces that is proposed in this application is somewhat confused;

- The Travel Plan states “3.11 A total of eight cycle parking spaces are being provided to serve the Development.” It is assumed that the proposal is actually for 16 cycle parking spaces as the Site Plan shows two locations, each comprising 4 cycle stands which would each accommodate two bicycles.
- The Site Plan appears to show **no cycle parking for customers of the Plot 1 facility**. The Design & Access Statement para 3.04 refers only to *cycle hoops for staff to use* when discussing Plot 1. **This is a significant omission.**

A total of 16 spaces is inadequate to provide for both staff and customers combined at a site of this size. This number fails to support the statement in the Travel Plan that “the branch is sustainably located maximising provision for access into the site for pedestrians, cyclists and those arriving by bus.”

The Exeter Sustainable Transport SPD para 5.1.4 recommends numbers of cycle spaces for retail facilities as below;

	SPD Recommendation	Proposed
Visitors/customers	1 space per 500m ² of net retail floorspace (min 4 spaces) = <u>9 spaces</u> for this development *	Up to 8, shared with staff. None of which are at Plot 1
Staff	1 space per 350m ² of net retail floorspace (min 4 spaces) = <u>12 spaces</u> for this development *	Up to 16, shared with customers
Combined	21 spaces	16 spaces

* Plot 1: 2,596m² + Plot 2: 1,692m² = **4,093m²** / 500m² = 8.186 spaces
Plot dimensions as stated on page 12 of the Transport Statement.

Note also that the cycle parking that is located at Plot 1 is separated from the cycle parking at Plot 2 (located in front of Unit 2) by a fence or wall, which greatly inhibits sharing of cycle parking facilities between plots. It is recommended that access is provided to enable sharing of cycle parking facilities between Plots 1 and 2.

For reference see;

- TfL standards: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>
- Devon County Council Travel Devon Toolkit, Cycle parking design guidance: <https://www.traveldevontoolkit.info/resources/Cycle%20parking%20design%20guidance.pdf>
- Local Transport Plan 3 (LTP3): <https://www.devon.gov.uk/roadsandtransport/trafc-informaton/transport-planning/devon-andtorbay-local-transport-plan-3-2011-2026/>

2. Increase the area allocated to cycle parking and relocate it

a) **Area for cycle parking:** Increase the size of the overall area allocated to cycle parking across plots 1 and 2 to accommodate more bicycles and also cargo cycles at this retail site and support inclusive cycling with space for adaptive cycles for those with disabilities or special needs.

b) **Location of cycle parking:** Access to the proposed cycle parking shelter at Plot 1 is via a route of approx. 6m width that is bounded between the line of 27 car spaces and a storage area, and the shelter itself is close to two goods roller shutter doors.

There is likely to be conflict between cycles, cars manoeuvring to and from the parking spaces, pedestrians walking to and from parked cars and goods movements around the two goods door entrances which are adjacent to the cycle parking shelter and the storage area.

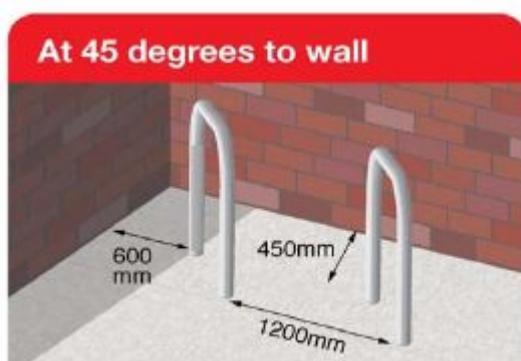
It is recommended that the cycle parking is relocated to a larger and more accessible position, for example at the opposite end of the row of 27 car parking spaces, where it would be visible from the main entrance on Hennock Road North.

Layout/General Arrangement

The following improvements are recommended with regard to the layout and general arrangement of facilities at the site.

1. Re-position cycle stands

The Site Plan shows that access to the cycle hoops is restricted by the adjacent car parking space and right-angled walls. It is recommended that the hoops are relocated as described at 2b) above, but that if stands are located close to right-angled walls, they must be installed at an angle of 45 degrees to the wall to provide ease of access;



Correct spacing and positioning of sheffield stands (images © ParkThatBike)

For reference see;

- TfL standards: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>
- Devon County Council Travel Devon Toolkit, Cycle parking design guidance: <https://www.traveldevontoolkit.info/resources/Cycle%20parking%20design%20guidance.pdf>
- Local Transport Plan 3 (LTP3): <https://newndevonngovnuke/roadsandtransport/trafc-informaton/transport-planning/devon-andtorbay-local-transport-plan-3-2011-2026/>

2. Provide a dropped kerb for cycle stands at Plot 2

The Site Plan indicates a continuous kerb near to the cycle stands for Plot 2 (in front of Unit 2). It is recommended that a dropped kerb should be installed to provide access to the stands.

3. Design of cycle stands

No detail is provided as to the design of the cycle ‘hoops’ as they are referred to in the application, but it is recommended that Sheffield stands are installed, as widely agreed to be best practice and illustrated above..

4. Signposting

It is recommended that clear signs to cycle parking are installed close to site entrances.

5. Staff showers, lockers and space to dry clothes

These facilities will all encourage staff to cycle to work. ST SPD Para 5.3.1 states that;

*“Where more than 20 people are to be employed, **these facilities must be provided**, and that where possible, they should also be provided for smaller employment premises, particularly newbuild development which is well located in relation to the city’s cycle network.”*

It is likely that the number of employees at this development will exceed 20, meaning that such a condition **must** be added as a pre-condition to secure the development.

6. Dedicated routes within car parks for safety of pedestrians linking the units with roads

The Design & Access Statement para 3.04 states that “*Dedicated routes are provided within the car parks for the safety of pedestrians linking the units with roads*”. It is not clear from the Site Plan where these dedicated routes are situated. It is recommended that routes within the car parks take into account the safety of cyclists as well as pedestrians, and consider potential risks to pedestrians from cycle movements on the site.

7. Widen the visibility splay on Grace Road Central

We recommend that the visibility splay at the entrance onto Grace Road Central, adjacent to Plot 3, should be widened to provide a safe and suitable access in accordance with paragraphs 108 and 110 of the National Planning Policy Framework and policy CP9 of the ECC Core Strategy.

Vision at this point is restricted by proximity of the Plot 3 site. The proposed plan indicates that this will be a busy access point for a variety of traffic that will present vulnerabilities to pedestrians and cyclists, including staff car parking, plant movements and deliveries to and from the goods doors at the rear of Unit 1, and movements around the storage areas adjacent to Plot 3 and at the rear of Unit 1.

In addition, we recommend that safe cycle linkages from the site to Exeter’s cycle routes are given priority in any future local highways improvements, especially **improvements to the junction at Hennock Road and Alphington Road** to ease cycling between the site entrances and the on-road cycle lane to the south at Hennock Road Central, as well as the traffic-free route at Clapperbrook Lane to the East.

For reference see;

- TfL standards: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>
- Devon County Council Travel Devon Toolkit, Cycle parking design guidance: <https://www.traveldevontoolkit.info/resources/Cycle%20parking%20design%20guidance.pdf>
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On the basis of the above, Exeter Cycling Campaign has no choice but to object to this application. However, we trust that appropriate measures will be taken by the applicant that will enable the Campaign to withdraw its objection, and that all parties take heed of the anticipated announcement that Exeter City Council will soon declare a Climate Emergency.

Kind regards,

Rosemary Waite

for and on behalf of:

EXETER CYCLING CAMPAIGN

exetercyclingcampaign.org.uk

Twitter: [@ExeterCycling](https://twitter.com/ExeterCycling)

Facebook: ExeterCyclingCampaign

For reference see;

- TfL standards: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>
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