



## **19/1384/FUL | Construction of 20 dwellings, parking and associated external works to include 7 affordable dwellings. | The Vines Gipsy Lane Exeter Devon EX1 3RL.**

4<sup>th</sup> December 2019

Dear Sir/Madam,

The Exeter Cycling Campaign would like to offer the following comments on planning application 19/1384/FUL.

The Design Access Statement features one very brief paragraph on sustainable transport. In it, the developer claims that the development is in a sustainable location and is 'well suited to benefit from alternative, sustainable travel options for residents'. The Campaign disagrees with this statement.

Firstly, the development is in a *potentially* sustainable location, however the developer has shown no interest in realising this potential. The first thing that became obvious when looking at this proposed development was its lack of permeability. The site's proximity to a cycle lane and its links to the Science Park and routes towards Exeter city centre are mentioned in the Design Access Statement. However, this scheme fails to link to this existing infrastructure efficiently. The obvious option of a link out of the development to the south west has been missed. This forces people on foot and on bikes coming from the Hollow Lane link towards the city centre to take an inconvenient detour. Whilst the detour is not significant in its length, the failure of the developer to consider any mode of transport other than the car is glaring. This failure is in contravention of several local and national planning policies. For example:

- The National Planning Policy Framework requires that opportunities to promote walking, cycling and public transport use must be identified and pursued (Paragraph 102).
- The Exeter Core Strategy requires that particular attention should be given to ensuring permeable layouts (Paragraph 10.55).
- The Exeter City Corporate Plan, which aims to make Exeter the most active city in England, where sustainable modes of transport are quicker and more convenient than the use of a private car.

A site cannot be considered intrinsically sustainable. The site must be developed in such a way as to promote sustainable choices by its residents. This developer has made no effort to link the development other than via the highway, and therefore the development cannot be considered sustainable.

The previous successful planning application for this site (14/2155) has a temporary construction access from the south west which is then retained on completion as access for people on foot and bike. Why has this been lost in the current design? The existing outline planning permission was also for 17 dwellings, rather than 20. Has the access been sacrificed to shoehorn in some additional houses?

Secondly, the developer has not provided a single cycle parking space on the entire development. This development as it stands is not 'well suited' to people who wish to use a bike. The developer is clearly aware of the supplementary planning guidances issued by Exeter City Council, as several are referred to in the Design Access Statement. They unfortunately appear not to be aware of the SPD covering sustainable transport as they have failed to meet its requirements for cycle parking.

The requirements of this SPD are that all new build developments provide, as a minimum, one cycle parking space per dwelling for dwellings of 1 or 2 bedrooms, and 2 cycle parking spaces per dwelling for dwellings of 3 or more bedrooms. These are

absolute minimum standards. The Sustainable Transport SPD makes it clear that if the development is well located for cycling, applicants should consider exceeding these standards. The developer clearly considers this a good location for cycling, as they say so themselves, so why have they failed to provide any cycle parking? Again, the developer has failed to encourage the residents to make sustainable choices.

The Sustainable Transport SPD refers to the Residential Design SPD in its requirements for the design of cycle parking. The developers are definitely aware of the Residential Design SPD, as they refer to it in their own document. The requirements are that cycle parking is secure and convenient. This means a separate door if the cycle parking is provided in a garage, with an additional 0.5m of length or width of the garage to accommodate the bike. The only doors seen on the plans of the garages provide access from the rear garden. The purpose of the separate door is that the bike may be taken in and out with the car in situ. This will not be possible based on the current plans. For those dwellings that have no garage, cycle parking should be at the front of the property, sheltered and secure. This developer has failed to provide any of this.

The Exeter Cycling Campaign therefore **objects** to this development on the grounds that the developer has failed to meet the requirements of several local and national planning policies and guidance's. They have failed to exploit an obvious and easy link to the south west, which would greatly improve the permeability of the scheme, and they have failed to provide the secure, convenient cycle parking required. This planning application should be refused.

Kind regards,

Michael Kerr

for and on behalf of:

EXETER **CYCLING** CAMPAIGN

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