



17 December 2021

By Email to: planningcranbrook@eastdevon.gov.uk

Dear Sir/Madam,

Planning Application 21/2396/MRES | Approval of the reserved matters of access, appearance, landscaping, layout and scale for the construction of a connecting road, a foul water pumping station (to include both underground and over ground infrastructure and secure boundary fence), a surface water basin with associated engineering works, car parking and landscaping. Discharge of conditions 6, 14, 17, and 24 of planning permission 03/P1900. (This is a subsequent application in respect of permission 03/P1900 which was accompanied by an Environmental Statement) | Land To The North Of London Road Cranbrook

I am writing on behalf of the Exeter Cycling Campaign in respect to the above planning application. We object to the application and believe that it should be refused for the reasons set out in this letter.

We believe that the proposals do not provide cycling facilities that reflect the commitments made by the Developers at the outline planning stage and are not consistent with the East Devon Local Plan policies or the The Cranbrook Plan Development Plan Document (draft) as laid out in Appendix A.

Reason for Objection: The footway along West/ South side of road has partly been reduced from Pedestrian and Cycle path (shown in application 14/2137/MRES) to a narrower Pedestrian only path which we do not believe to be consistent with commitments in the Cranbrook Design Guide submitted as part of the approved application 03/P1900.

The application 14/2137/MRES proposed provision of shared pedestrian and cycle paths along both sides of the Main Local Route for its entire length, as is the case through existing areas of Cranbrook; the current application only shows continuous cycle provision along the east/ north side of the Main Local Route, with limited provision along the west/ south side.

We believe there is a strong argument that providing cycle facilities along one side of the road, particularly where no safe crossing opportunities are being proposed, creates a barrier to people using this facility. In this case the problem is exacerbated by the cycle facilities being on the side of the road away from the majority of the housing.

Within the Cranbrook Design Guide, submitted as part of the approved application 03/P1900, the Developers promise to create a comprehensive, easy-to-use, permeable network for cyclists and pedestrians where their movement is prioritised over motor traffic. We do not believe that reduced cycle provision along one side of the Main Local Route is consistent with these commitments. We also believe it is not consistent with the Transport Hierarchy within East Devon Local Plan (2013 – 2031) Strategy 1 or the commitment within the The Cranbrook Plan Development Plan Document(draft) CB1 Health and Wellbeing at Cranbrook (particularly points 4/5) as set out in Appendix A.

Reason for objection: The crossing provision for cyclists and pedestrians is poor. Side road crossings appear to give priority to motor vehicles in most instances. No provision appears to have been made for cyclists and pedestrians crossing from one side of the Main Local Route to the other.

The highway layout drawing 10301-100-501 appears to show traditional style motor vehicle priority at side roads. We believe that this approach is inconsistent with the Developer commitments and local planning policy set out in Appendix A, which state that cyclists and pedestrians should be prioritised over motor traffic.

We believe that as outlined in national guidance, laid out in Local Transport Note 1/20 Cycle Infrastructure Design (LTN 1/20) Section 10.5, that the physical highway infrastructure should implement priority across side roads for pedestrians and cyclists. LTN 1/20 10.5.7 states “In urban areas, where protected space separate from the carriageway is provided for cycling, it is important to design priority junctions so that wherever possible cyclists can cross the minor arms of junctions in a safe manner without losing priority. This enables cyclists to maintain momentum safely, meeting the core design outcomes of safety, directness and comfort.”

On reviewing the highway layout drawing 10301-100-501 we note that there is a total absence of any kind of facility to cross from one side of the main local route to the other. There are no instances of tactile paving (which should be present to enable crossing by visually impaired individuals) suggesting the absence of dropped kerbs. Additionally the presence of parking bays along much of the main local route have the potential to create a barrier to crossing the road - both by taking up space along the road, but also because parked vehicles can reduce visibility along the for people trying to cross. Within much of Cranbrook there are significant levels of large work vans parking during evenings and weekends and these can significantly restrict visibility.

We believe that for the commitments to permeability and direct routes for cyclists set out in Appendix A to be realised that the proposals should include clear, regular crossing points across the main local route. We believe that these are important not only to cyclists but to pedestrians, particularly those with disabilities and parents with children.

We are aware that the development sequence often includes an uplift phase where kerbs, surfaces and crossing facilities are completed. We feel however that it is important that quality facilities are provided for walking and cycling are provided from the first property occupied. We believe that poor quality temporary surfacing, lack of proper crossing and dropped kerbs can act as barriers to cycling. If residents are discouraged from active travel in favour of cars when they first occupy their properties then this may setup habits for local journeys that they may never reverse.

Kind Regards,

Tim Mills

info@exetercyclingcampaign.org.uk

On behalf of

EXETER CYCLING CAMPAIGN

Appendix A - Local Planning Policy for Cycling and Previous Developer Commitments to Cycling for Cranbrook

A key document submitted by the Developers as part of their approved Outline Planning Application was the **Cranbrook Design Guide**. In this document the Developers identify and commit to the following role for cycling within Cranbrook:

“The network of routes and the design of the environment will be on a human scale and should instead dilute car movements giving pedestrians and cyclist freedom to access all areas of the public realm with relative ease.” p31, Urban Design Principles - Permeability.

“It is intended that pedestrian and cycle movement and public transport should take precedence, based upon a permeable network of streets..” p.32, Urban Design Principles - Pedestrian and Cycle Movement.

“Cycle and pedestrian movement should be rendered possible along the most direct route to local facilities even if the car driver find the route more difficult.” p.32, Urban Design Principles - Pedestrian and Cycle Movement.

The **East Devon Local Plan (2013 – 2031)** Strategy 11, Integrated Transport and Infrastructure Provision at East Devon's West End, highlights the priority given to cycling within Cranbrook:

“ We will promote high quality and integrated transport provision at East Devon's West End where, working with partner organisations, we will secure a provision based on a hierarchy of;

1. Walking
2. Cycling
3. Frequent and high quality Public Transport provision (given priority over other road users)
4. Private motor vehicles.

Though transport solutions will take into account site specific needs of a development to secure the most suitable form of sustainable transport provision...”

Most recently **The Cranbrook Plan Development Plan Document** (draft) includes the following policy; for brevity we have only included the relevant part of the policy.

“CB1 Health and Wellbeing at Cranbrook

To maintain and improve the good health and wellbeing of individuals and the community as a whole at Cranbrook, development proposals must:

...

4. *Ensure that locations of services and land uses in Cranbrook integrate well with the community and are within easy reach on foot and bicycle wherever possible;*
5. *Create well designed streets and spaces using the Healthy Streets Approach to encourage walking, cycling and social activity; ...”*