

## 21/3148/MOUT Office development Tithebarn Lane

The Exeter Cycling Campaign is grateful for the opportunity to comment on the application for Outline application for an office development on land to the East Of Anning Road/ Tithebarn Way Redhayes Exeter.

The details we examined are found here:

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=R3HZ9BGHJM400>

The Exeter Cycling Campaign **objects** to this planning application until further clarity is given about car and cycle parking.

The Application refers to the National Planning Policy Framework and quotes paragraph 113 which states that “*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that... opportunities to promote walking, cycling and public transport use are identified and pursued*” and paragraph 110 which states that “*appropriate opportunities to promote sustainable transport modes can be – or have been – taken up*”.

Furthermore, the East Devon Local Plan (2013-2031) states that:

*“Development will need to be of a form, incorporate proposals for and be at locations where it will **encourage and allow for** efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.”*

We are struggling to see how the Applicant has met these requirements. The Application relies on the good cycling infrastructure surrounding this site but appears to have made no effort to reflect these policy imperatives in the way they are designing cycle and car parking.

### Car Parking

The Applicant is relying on support from the DCC Transportation Strategy & Road Safety Manager dating back to 2018 which conceded that approximately 204 parking spaces can be provided.

This 2018 letter from DCC pre-dates the County’s and District’s declaration of a climate emergency. We suggest that to maintain these car parking levels is no longer acceptable given the County’s and District’s subsequent strategies on reducing carbon pollution.

The [Devon draft Carbon Plan](#) states an imperative to:

1. Reduce the need to travel
2. Shift to sustainable transport options.

This Application appears to make no attempt to make adjustments in the light of this Carbon Plan.

The Council aims to have 50% of journeys done by foot or bike. This Development’s provision for car parking continues the old mentality of assuming most will drive in private cars to these offices.

# 21/3148/MOUT Office development Tithebarn Lane

## Cycle Parking

The Transport Assessment states that “a minimum of one cycle parking space per 200m” which, taking the GIA of 6,000 sqm, we believe equates to 30 cycle parking spaces. Planning on having 204 car parking places but only about 15% of this figure for cycling does not support the county’s strategy to have 50% of journeys by foot / bike. It is unambitious.

We would ask that the **actual** provision of cycle parking is made explicit in the transport assessment and that the number of cycle parking places reflects the strategic aim of having 50% of journeys by foot/bike.

The SPD ‘T3 Cycle Parking minimum standards’ lays out minimum cycle parking provision standards. Given the imperative to decarbonise our transport system we would expect the Applicant to exceed these minimums.

Our expectation and request is that cycle parking is:

- Secure
- Lit
- Enclosed and waterproof
- In the most convenient location near to the office entrances
- Of suitable design (e.g. Sheffield Loops)
- Accommodates space / parking for non-standard cycles

We expect [LTN 1/20](#) Section 11 and ‘[STANDARDS FOR PUBLIC CYCLE PARKING](#)’ (endorsed by the Transport Minister in June 2021) to guide the design of cycle parking on this site.

We would expect to see in the more detailed Application a commitment to build showers and changing facilities for active travellers to the site. These facilities should be commensurate with the councils’ strategy to have 50% of commuter journeys by foot or bike.

## Access to the site

To meet the NPPF and East Devon Local Plan paragraphs quoted above which stipulate that developments must enable people to walk and cycle to a new site we request that foot and cycle access be built into the north of the site from Blackhorse Lane. It is unclear whether this is part of the transport design.

## Other Concerns

We are uneasy with the analysis that the additional (is it?) 200 vehicle movements along Tithebarn Way, many of which will turn to/from Honiton Road, will have no deleterious impact. The historical recorded incidents were at junctions.

The NPPF (para 112) stipulates that applicants should ‘*give priority first to pedestrian and cycle movements*’. The Transport Assessment (para 3.5.4) states that “*dropped kerbs and tactile paving is provided at the site access and a parallel crossing is provided to the north of the site*”. We would seek clarity that the ‘parallel crossing’ meets LTN 1/20 design standards and gives priority over vehicular traffic to people walking and cycling.

## 21/3148/MOUT Office development Tithebarn Lane

Thank you for your attention to these matters. We look forward to how the Applicant proposes to address these concerns so that we can remove our objection.

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