22/1532/MOUT | Outline planning application for up to 1,035 residential dwellings; a neighbourhood centre, primary school, public open space, a sports hub, up to 10.25ha of employment land, serviced pitches for gypsies and travellers; an extension to the existing Cranbrook Energy Centre; sustainable drainage systems; and associated infrastructure. | Treasbeare Expansion Area Land To The North Of Treasbeare Farm

30th August 2022

By Email to: planningcranbrook@eastdevon.gov.uk

Dear Planning Officers,

Exeter Cycling Campaign is grateful for the opportunity to comment on this application. Despite the thought that has been put into the design of the Cranbrook Expansion - Treasbeare Garden Village with regards to cycling and active travel, we have a number of concerns with the application as it stands. Unfortunately therefore we object to the application until our concerns are addressed.

There are some very positive design decisions in these plans, most notably:

- Provision of segregated cycle paths along the primary and secondary streets through the site.
- The retention of Treasbeare Lane and Parsons Lanes as greenways for pedestrians and cycle users.
- 5m wide shared paths on all of the primary streets.
- 3.5m wide shared paths on all of the secondary streets.
- Good permeability of the site, with leisure cycling / walking routes.
- Planning for 20mph vehicle speeds on all Primary and Secondary routes and 10mph on all other routes.

This is a good start and the developers should be congratulated, whilst also being encouraged to go further in some areas. The following is a list of areas where we think there could be improvements, or where the developer could focus attention when reaching the reserved matter stage.

General layout

The general layout has good permeability for bicycle users across a variety of streets (primary, secondary, community, greenways etc). Clear thought has been given to provide sufficiently wide cycle routes on the main streets. However, as we note later in this response, the crossings of London Road do not yet reach a high enough standard, and we also note that two key cycle access points are only listed as "future" rather than being included at the outset into the detailed plans.

We would request that including pedestrian and cycle access to the employment areas from the southern end of Treasbeare Lane be made a condition of granting the planning consent. These access points will encourage active travel to these areas by making it the shortest possible journey.

Street Hierarchy

The street hierarchy (**Design and Access Statement, Section 8.5**) is on the whole well thought through, as is the overall site limit of 20mph for all streets (except Community Streets at 10mph). The inclusion of 5m wide shared footway/cycleways on both sides of the Primary Streets is welcomed (though as we note below, this is not shown on the plan of the Neighbourhood Centre).

Through the employment areas, the Primary Streets only have 5m shared footway/cycleways on one side. As bicycle users are likely to want to access buildings on both sides of the street, we would like there be a minimum 3m wide shared footway/cycleway on **both** sides (following LTN 1/20, Table 6-3 guidance), to ensure that their journeys are safe.

The inclusion of 3.5m wide shared footway/cycleways on one side of Secondary Streets is also welcomed, though we would encourage that this be provided on both sides of the streets.

The Planted Streets cause us more concern. We presume that cycle users would be on the carriageway here and although vehicle speeds are to be limited to 20mph the on street parking creates a conflict with a greater chance of "dooring" and also narrowing the carriageway acting as pinch points. It is not clear how any charging infrastructure for EVs parked on-street would be placed to cause no impact on the users of the pedestrian footways. We would like to see additional engineering solutions to ensure vehicle speeds are kept to below the desired 20mph limit.

The Community Streets also cause concern about how parking will be managed to retain a usable and safe space for those cycling in these areas. We would also like to see details as to how vehicle speeds will be limited to 10mph though are encouraged by this.

Neighbourhood Centre

The inclusion of this from the start with clear and obvious links to the cycleway network is to be commended, as are the plans to include a mobility hub with bike share locations at this site (**Design and Access Statement, Section 8.2; Travel Plan, Section 13.2**). We look forward to the detailed plans of this space which will no doubt include sufficient, secure and convenient cycle parking for the food store and other venues and confirm details of the hub. We would expect to see adequate provision in this mobility hub for non-standard bike forms (cargo bikes, trikes, handcycles etc) as well as charging facilities for e bikes. The mobility hub design needs to meet the standards laid out in section 11 of LTN 1/20.

However, we note the difference in design of the Primary Street in this location, with only the southern side having a 5m wide shared use footway/cycleway, and the northern side being much narrower (**Design and Access Statement, Section 8.5**). We would expect this to be of the same design as other Primary Streets, with 3m wide shared footway/cycleways on **both** sides, to facilitate safe and convenient journeys for those wanting to access the residential areas to the east of the Neighbourhood Centre and to the north of this road without needing to cross the carriageway.

London Road/Younghayes Road/Access road roundabout

This junction is unacceptable for the following reasons:

1. The **drawing 12 REV 1** lacks detail, but appears to show two uncontrolled staggered crossings of London Road with a central refuge. If the crossings are uncontrolled then there is no need for them to be staggered but they should be indicated with a raised table to reduce vehicle speeds and indicate priority for crossing users. Since this road is through a residential area we would expect the speed limit to be reduced to 20mph at this point.

   However as the traffic flows on London Road are significant and fast (currently London Road is a 40mph limit) and no further change is made to the speed limit then the crossings should be Toucan Crossings and they should be a single stage crossing without a central refuge as per our suggestions elsewhere

2. We also note that the drawing shows a proposed dedicated left turn slip lane. This is particularly hazardous for cyclists as mentioned in LTN 1/20, paragraph 10.7.2.

   It is not clear whether the existing bus lane on the B3174 westbound from the junction with Younghayes Road will be retained. The drawings for the Station Road junction do not help in this regard. If the bus lane is not removed, then this segregated left turn slip lane is not necessary given there is effectively only a single vehicle lane available when leaving the roundabout.

3. The 5m shared footway on the west of the access road to the development appears to terminate at the staggered crossing, and a verge and cutting slope are indicated

(**drawing 12 REV 1**). However, the masterplan (**drawing BL-M-Ai-01 Rev B)** and the Neighbourhood Centre **(Design and Access Statement, Section 8.2)** shows a continuation of a cycle route along the south side of London Road, to join the planned access road opposite Station Road. This ambiguity needs to be clarified.

4. The provision of a 5m wide footway/cycleway from London Road along both sides of this access road is welcomed (**drawing 12 REV 1**). However, as the land to the north of London Road at this junction also falls within this development, we are disappointed to note that the shared footway on this side of London Road appears narrower than 5m. It would be good to take this opportunity to ensure wide shared use footways throughout.
5. The staggered crossing of Younghayes Road does not align with the gap in the planting as indicated in the drawing.

London Road/Mayfield Road/Parsons Lane roundabout

This junction is unacceptable for the following reasons:

1. The proposed staggered toucan crossing of London Road does not comply with "LTN 1/20 Cycle infrastructure design", specifically paragraphs 10.4.19 and 10.4.20. Staggered crossings result in longer waiting times for pedestrians and bicycle users. Also the sharp turns on this very narrow traffic island are not accessible for non-standard cycles, those towing trailers (e.g. to/from the school). We believe this design will not pass a disability assessment. It will not be possible to safely cycle over this island with two-way use, and as a staggered crossing there is insufficient space on the island to accommodate many users waiting between phases. We **strongly** recommend a single stage toucan crossing without a central refuge.
2. The footway link along Parson Lane is shown as only 3m in **drawing 14** (Roundabout improvements) which does not agree with the 5m width on **drawing 20 – 124A** (Parsons Lane Indicative improvements).
3. It is not clear what the short stub of footway pointing south-west on the south-eastern side of this roundabout will connect to. If this does connect to a residential road/"Community Street" some form of crossing needs to be provided to allow users to access this safely.

London Road/Station Road/Employment Area Access road junction

This access is shown on the masterplan as a key strategic cycle link, but this junction as detailed in **drawing 10** is unacceptable for the following reasons:

1. There is no separated cycle route into the development along the access road from this junction, though as noted above, it is labelled as a key strategic cycle link. There is not even a pedestrian pavement noted on transect A-A.
2. There is no provision for cyclists on the existing Exeter to Cranbrook cycle route to cross London road and join the access road.

3. There is no provision for cyclists from the new development to cross London Road and join the existing cycle route to Exeter and Cranbrook (including the rail station).
4. The key cycle way on the south of London Road between the Younghayes Road junction and this junction (as shown on the masterplan, **drawing BL-M-Ai-01 Rev B**) is not shown in **drawing 10**.
5. The signalisation of the existing dangerous cycle crossing of Station Road is welcomed. However further details are needed around the nature of the crossing for pedestrians and bicycle users at Station Road. If the crossing of pedestrians and bicycle users is also signalised (as it should be given the signalisation for vehicles), the timings should be such that they do not have overly long wait times. A raised table would also encourage lower speeds into this junction from London Road.

   We would also like to see Station Road to be widened. The Echoes Nursery is mentioned as a key facility in the **Design and Access Statement** (Section 3.2) and is within the 2km radius, but as it is located some way north along Station Road from the junction with the B3174, this currently has no safe cycling route. Similarly for the Broadclyst Leisure Centre and Clyst Vale Community College.

Parsons Lane

Parsons Lane, from the bus gate towards Rockbeare is shown on the Master Plan as a key strategic cycle link, but there is no provision to limit the increase in motor vehicles arising from the development on this narrow lane (single lane with soft passing places). We recommend the closure of Parsons Lane to motor vehicles to encourage walking and cycling to the school and sports facilities from Rockbeare. This would also benefit the SANGS to be made fully connected rather than broken by a road. Failing this, as a minimum the road should be widened and/or have passing places made more robust as well as other features to keep vehicle speeds low.

The provision of a 5m wide footway/cycleway from London Road to the school is welcomed (**drawing 20-124 A**, though noting discrepancy with **drawing 14**). It would be a clear benefit if this had raised-table style crossings at each junction with the Community Streets, Edge Lane (the school access road), and Parsons Lane at the south east before the bus gate. Provision needs to be made at this end for users to easily join Parsons Lane towards Rockbeare and the bus gate link road.

School access

The arrangement around the school appears confused with the 5m footway/cycleway crossing the main vehicular access to the school and continuing with a narrow footway adjacent to the "drop off area" (**drawing 20-124 A**). This narrowing of the shared footway/cycleway will have the greatest impact at the time when the drop off area is heavily used, at the beginning and end of the school day. The 5m width should be retained along the road all the way to the school entrance given the likely peak usage rates and vulnerability of some of the users. The drop-off area should be segregated from the footway/cycleway to further reduce the risk of vehicle

movements around a primary school on vulnerable users, and moved farther from the school entrance to encourage travel to and from the school by other modes rather than private vehicles (with exceptions made for those with blue badges).

This lane is a cul-de-sac according to the Master plan (**drawing BL-M-Ai-01 Rev B**) and designated an Edge Lane (**Design and Access Statement**), and so parents and guardians dropping off children in private vehicles will need to turn around somewhere. The 3m-wide drop off zone may encourage the use of this space for three-point turns rather than using the school loop road, which will further reduce the usable space of the proposed narrow shared footway/cycleway. Vehicle drivers using the school loop road will cross the shared use footway twice when using this to be able to exit Edge Lane again at precisely the time when it is busiest, increasing the risk to vulnerable users. This access needs to be improved to ensure safety for all at the busiest times.

Treasbeare Lane/Roman Way/Copseclose Lane Crossing

Drawing BL-M-Ai-01 Rev B (Illustrative Masterplan) shows additional access points to the site for cyclists from London Road, which we assume forms part of this application for detailed approval of access. It is noted as a key Cycle/Pedestrian crossing point in the Design Access Statement (**8.4**) as part of Phase 1 (**8.9)**. However the application does not appear to show any details for these.

This crossing, which would provide access to Treasbeare Lane, a proposed low-traffic (restricted entry) walking and cycling route through the heart of the development is only listed as a "future access point". Given this would provide the most direct access to St Martins Primary School, and the Younghayes Centre and shops more details are needed at this early stage to allow feedback on the design, and commitment to providing this crossing and access point at the outset is needed, and that it will be available from first occupation.

Our comments on the crossings of London Road by Mayfield Road and Younghayes Lane are relevant here, to provide a single stage crossing of London Road in a way that ensures pedestrians and bicycle users can safely and conveniently cross this major artery.

It is also not clear which vehicles will be authorised to use this traffic-free footway/cycleway (**Travel Plan 5.4.1**). If farm vehicles are still intended to use this route, then it is not traffic-free, and these vehicles pose significant risk to walkers and bicycle users. We recommend that access to Treasbeare Farm is reconsidered.

Rockbeare Bridge "Post Coach Way" Crossing

Drawing BL-M-Ai-01 Rev B (Illustrative Masterplan) shows additional access points to the site for cyclists from London Road, which we assume forms part of this application for detailed approval of access. It is noted as a key Cycle/Pedestrian crossing point in the **Design Access Statement** (**8.4**) as part of Phase 1 (**8.9)**. However the application does not appear to show any details for these.

This crossing is only listed as a “future access point”. Given this would provide the most direct access to the new primary school, SANGS and sports pitches for residents from north of London Road, especially those to the east of this development (e.g. the new town centre), commitment to providing this at the outset is needed as well as more details to allow for feedback on the design and agreement that it will be available from first occupation.

Our comments on the crossings of London Road by Mayfield Road and Younghayes Lane are relevant here, to provide a single stage crossing of London Road in a way that ensures pedestrians and bicycle users can safely and conveniently cross this major artery.

Notes on buildings and development

We note in the **Design and Access Statement** (Section 2.2) reference to The Cranbrook Plan policy CB20, which has been repeated therein. It states that:

“*Residential development will be required to provide parking provision at an average of not less than 1.7 car parking spaces per dwelling. Not less than 30% of parking spaces in a residential parcel shall be provided in parking bays adjacent to adoptable streets as unallocated parking. Bicycle parking must be provided in all future developments at a ratio of 1 bike storage space per bedroom. All destinations that attract regular visitors, including the employment facilities, will be expected to provide cycle parking provision at a ratio of 1 space for each of the first 4 Full Time Equivalent jobs and 1 space per 7 Full Time Equivalent jobs thereafter.*”

No details of the level of provision for dwellings in either Central Treasbeare or Treasbeare Gateways nor the buildings in the Employment areas are given (Section 8.2). We are concerned that cycle parking provision will not align with council design policies in terms of design and quantity. Furthermore we would like to see suggestions below also implemented in the design and plans .

- Ensure cycle parking is located near the fronts of properties to make it easy to access, helping ensure that cycling is the natural choice for short journeys. Making bikes hard to access, in back gardens, with narrow access lanes, adds a barrier to cycle use. This is often in contrast to car parking which is usually immediately outside people’s front doors and thus becomes the default choice; this is in opposition to the planning authority and developer’s stated aim to reduce car use.
- Exceed local minimum parking standards, i.e. by ensuring one bed homes have access to at least two bike parking spaces as these homes are often shared by couples.

We are eager for this development design to demonstrate adherence to council Coordinated Sustainable Travel policy which states:

“*Vehicles and parking/docking spaces for shared cars and shared/rented electric bicycles shall be provided to support multimodal travel. In the mixed-use and the employment areas, provision shall be made at a minimum ratio of 1 shared car or 5 bicycle docking stations and electric bicycles per 400 dwellings or per 200 employees.*"

As has been noted in the **Design and Access Statement** (Section 2.2) in reference to The Cranbrook Plan policy CB18.

Travel Plan

The use of Strava data as a proxy for how accessible the use of bicycles for transport is inappropriate. Strava is more often than not used by confident bicycle users who are happy to cycle along comparatively busy and fast roads. There are studies into the biases of who uses Strava to track their rides (Lee and Sener 2021), and the data do not well represent journeys done by women and older adults (Griffin and Jiao 2019) or children. Parents and guardians (often but not always women) also tend to do multi-point journeys (e.g. combining shopping and school pickup/drop off), rather than simple a-to-b trips e.g to a place of work (often but not always by men). We note that these are generalisations, and in many families these roles are shared, reversed or not applicable at all.

Therefore to use Strava data to show where people could cycle is one thing, where the average cyclist will be happy to is another. For example, Station road towards Broadclyst is well within the distance limit, and includes Echoes Nursery noted as a key facility in the **Design and Access Statement** (see our comments on **London Road/Station Road/Employment Area Access road junction** above). However, being a narrow lane heavily used by motor vehicles (including HGVs - see **Figs 2.2 to 2.4 of the Local Model Validation Report [Appendix N]**) makes this a very hostile road for people to cycle, and clearly not the same level of attractiveness as a route when compared to the Exeter-Cranbrook shared path along the B3174. We recommend that improvements to Station Road are included to make this journey safe for women and those transporting children to ensure this facility can be accessed sustainably.

Although as noted in **5.2.6,** many people do travel further than the average length of cycle journey, by making cycle routes safe, convenient and connected it will support those people who do not yet use bicycles for their day-to-day journeys.

We commend the retention of Treasbeare Lane as a traffic-free footway/cycleway (as noted in **5.4.1** and elsewhere in the application) though again note that the crossing of London Road to Roman Way/Copseclose Lane is not detailed in this application (see above). We also note the difference between a traffic-free footway/cycleway (**5.4.1**) and the "Pedestrian and Cycle Access and Restricted Vehicle Access Point" designation in the Masterplan (**Drawing BL-M-Ai-01 Rev B**).

We are disappointed in the lack of detail around the workplace and educational travel plan measures, with all options being only listed as "possible".

References:

Lee, Kyuhyun, and Ipek Nese Sener. 2021. "Strava Metro Data for Bicycle Monitoring: A Literature Review." *Transport Reviews* 41 (1): 27–47. https://doi.org/10.1080/01441647.2020.1798558.

Griffin, Greg, and Junfeng Jiao. 2019. “Crowdsourcing Bicycle Volumes: Exploring the Role of Volunteered Geographic Information and Established Monitoring Methods.” *SocArXiv*, January. https://doi.org/10.31235/osf.io/e3hbc.

Environmental Statement - Chapter 11 - Transport and Access

We are surprised that Parsons Lane was not included as one of the potentially sensitive receptors (11.33) given the narrowness of this Lane and its future as a walking and cycling route into the south-east of the proposed site.

We also note in Table 11.16, that although driver delay is projected to have minor adverse impacts, but with major beneficial residual effects (both Completed Development and Cumulative Effects). However, for pedestrians and cyclists the impacts are major adverse with minor adverse as residual effects. We are surprised and disappointed that drivers have been prioritised over the safety and needs of people walking, scooting, wheeling or cycling. This out of date thinking runs contrary to the standards set in the National Planning Policy Framework about prioritising active travel and undermines the local and national targets set for enabling active travel and decarbonising transport.

FAO Planning Authority

We would ask that the planning authority impose conditions on the development that the promised pedestrian and cycling infrastructure is put in place prior to any occupation of the site. This is critical in ensuring that new residents have active travel options available to them when they move in, which is the period in which they will form their travel habits.

Summary

We welcome the efforts made to design in safe space to enable active travel. We hope that these comments and suggestions help further improve this application in encouraging more active travel by residents and visitors to the Treasbeare Garden Village, and so helping the council to achieve its stated objectives in this regard.

However, there remain some ambiguities in the plan or lack of detail that give us cause for concern. These include:

- Details of the “future” access points at Treasbeare Lane and Rockbeare Bridge and a commitment to ensure these are constructed and available for use at first occupation.
- The shared footway to the south of the B3174 between Younghayes Road and Station Road junctions is missing on some plans
- How parking and other street clutter on Planted Streets will be managed, as well as solutions to ensure 20mph.
- The solutions to ensure 10mph on Community Streets.
- Treasbeare Lane needs thought as to how the passage of farm vehicles will be managed so that a quiet cycleway/footway will be retained.
- Details on the location and quantity of cycle parking for the dwellings and employment buildings are needed, with the requirement that these are easily accessible and meet council design policies.
- That the use of Strava for the Travel Plan is reconsidered given the biassed nature of the data available therein.
- Details around the workplace and educational travel plan measures, as currently all options are only listed as "possible".
- The crossing of Younghayes Road does not align with the gap in the planting as shown.
- The stub of footway at London Road/Mayfield Road/Parsons Lane needs to connect with something and have suitable crossing infrastructure.

We would ask that these are addressed before this application is submitted for consideration by the Planning Committee.

Furthermore, we have made a number of proposals in our response which, if addressed appropriately, would allow us to remove our objection and we would hope to see some made as conditions for granting the planning application. These include:

- Redesign of the major junctions in this application e.g. to remove the staggered crossings (Younghayes Road, Mayfield Road), to include segregated access to/from Employment Area and the Exeter-Cranbrook cycle route (Station Road) amongst other issues.
- The school access needs to retain a wide segregated cycle route and remove the conflict with vehicles using the drop-off area.
- Inclusion of pedestrian and cycle access to the employment areas from the southern end of Treasbeare Lane.

- The Neighbourhood Centre to include parking for all kinds of cycles and e-bike charging facilities.
- A 3m wide cycleway on both sides of Primary Streets through the employment areas and past the Neighbourhood Centre.
- Parsons Lane should be closed to vehicle through traffic to ensure this is a usable quietway.

Yours sincerely,

Robert Dunn

for and on behalf of:

EXETER CYCLING CAMPAIGN

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