



23/0232/FUL Cowley Bridge Road

12th September 2023

By Email to: planning@exeter.gov.uk

Dear Howard Smith,

We are grateful for the opportunity to provide an updated response to the revised proposals.

We understand the changes to the layout have been made predominantly in response to flooding issues. The landscape plan, and transport statement have not been updated to reflect the revised proposals and therefore it is difficult to fully assess any changes to the provisions for walking and cycling. The Design and Access Statement addendum also doesn't provide any additional information relevant to walking and cycling.

We have included our original response below which, without further information, is still relevant. One additional point to make is that the basement cycle store within the updated plans requires 3 sets of doors to access. This further reduces convenience and accessibility over the previously proposed 2 sets of doors. Other comments on the suitability of the cycle store location under point 2 still apply.

It is disappointing that significant revisions to the proposals have not taken the opportunity to address the comments. As previously we would ask that these concerns are seriously considered and addressed.

Yours sincerely,

Ben Ayliffe

for and on behalf of:

EXETER CYCLING CAMPAIGN

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Original response from March 2023:

Dear Howard Smith,

Exeter Cycling Campaign is grateful for the opportunity to comment on the application for purpose built student accommodation on Cowley Bridge Road.

We welcome the proposal for a car free scheme, the intention to provide a 3m wide footway/cycleway on Cowley Bridge Road, and the provision of an e-bike hire station. However we have some concerns and recommendations [\(in blue below\)](#) about this development. We would ask that these concerns are seriously considered and addressed.

1. Amount of cycle parking

The transport assessment acknowledges that the proposal falls short of Exeter City Council's (ECC) cycle parking standards, and only provides 62% of the required spaces. Future phased increase in storage is proposed to meet the standards, subject to monitoring of usage.

The transport statement provides the following justifications for providing storage below the minimum requirements, which we have followed with our comments.

- *'The site is within suitable walking distance of..... local facilities and amenities'.* Whilst this is a positive it does not negate providing future residents with the means to conveniently access wider facilities and amenities by bicycle. Key destinations which are easily cyclable include the city centre 2.5km to the south and Exeter Quay 3.2km to the south.
- *'it is not considered that the topography of the local area is especially conducive to cycling'.* Whilst the university site is steeply sloping, Cowley Bridge Road is relatively flat. This road requires improvements for cycling, which are discussed within point 4, but has potential to provide a link to the cycle network along the river at St David's Station. Increases in the affordability and popularity of electric bikes and potential future legalisation of e-scooters are reducing barriers to cycling in hillier areas generally. The transport assessment also contradicts this assertion at point 6.2.2 where it notes the *'attractiveness ofcycling within the vicinity of the site'*.

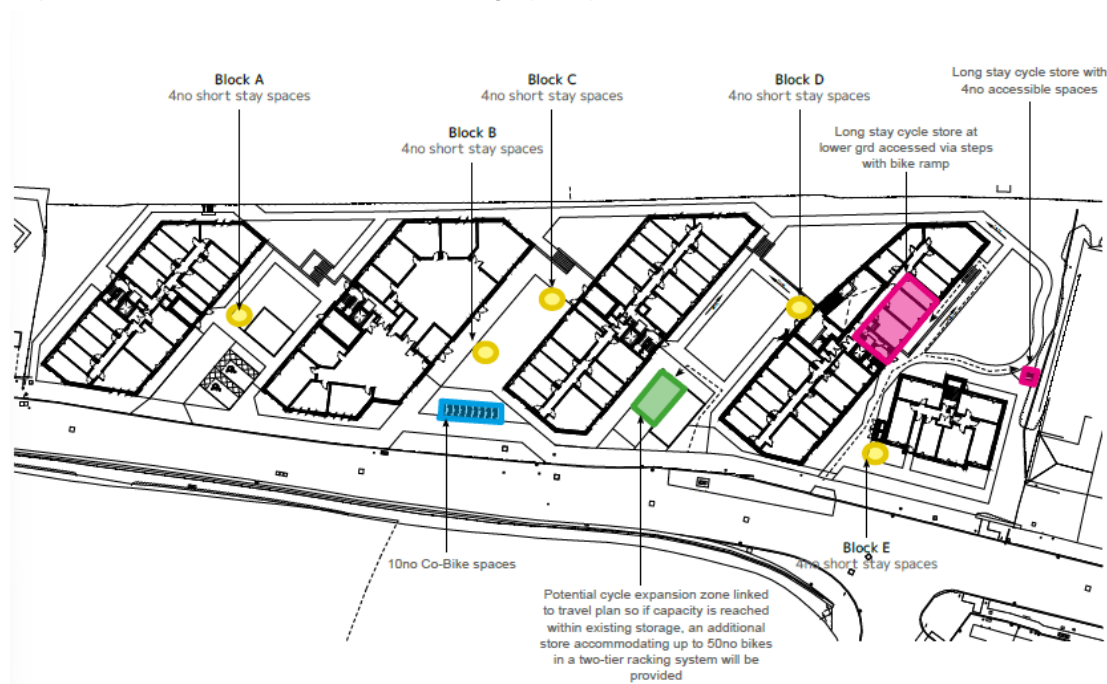
- 'the provision of an on-site bank of Co Bikes spaces will reduce the overall need for private cycle ownership'. We welcome the proposal for an e-bike hire station at the site. The bikes are publicly accessible and therefore can be used by local residents and students in other residential blocks. They will be of benefit to the future residents on the site but should be provided in addition to the minimum cycle parking requirements, as they do not represent a like for like substitution.

Further to the points above we note that the standards provided within ECC's Sustainable Transport Supplementary Planning Document are minimum requirements, and that local Transport Note 1/20 recommends a higher figure of 1 space per bedroom. As a car free scheme the development should be aiming for best practice in the amount of cycle parking.

Recommendation: Increase cycle storage requirements from day one of the development to at least meet ECC's minimum requirements. E-bike hire to be provided in addition.

2. Cycle parking location & access

Short stay visitor cycle parking is provided across the site as Sheffield hoops. These are noted in yellow on the plan extract below, are generally located near to residential entrances, and appear to be well overlooked by bedrooms. The location of these is supported. Consideration should be given to providing cover to these stands to improve the comfort of visitors arriving by bicycle in wet weather.



Long stay cycle storage is located beneath block D, highlighted in pink on the plan above, and is accessed via steps with a wheeling bike ramp.

LTN 1/20 notes that cycle parking in dwellings must be convenient, within the building or in the immediate vicinity. ECC's Sustainable Transport SPD notes that '*Communal stores should be conveniently located and secure*'. Providing one centralised cycle store for the entire development does not provide convenient access for many residents. Those living in block A would have to walk over 100m from the front door of the block to reach the store.

Locating the main store down a flight of external steps with a wheeling ramp reduces accessibility. Whilst it is acknowledged that a separate accessible cycle store is provided within the landscaped area, wider accessibility would be achieved by making the entire store level access. This is especially important for electric and non-standard bikes which due to their weight or size cannot use a wheeling ramp easily. Unless additional storage facilities for non-standard bicycle types, charging points for electric bikes and bicycle maintenance facilities are provided within the accessible cycle storage, then these facilities are not accessible to all users.

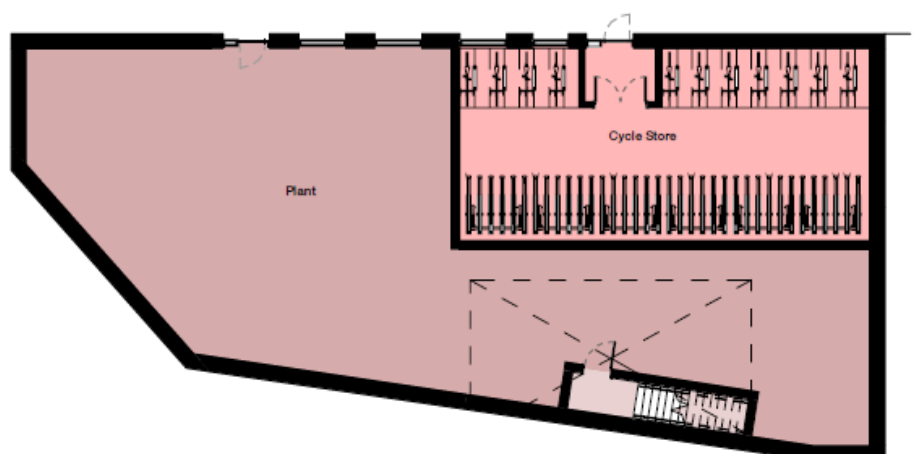
Accessing the main cycle store via a sunken passage is also likely to discourage use through security concerns.

Recommendation: Provide decentralised, covered cycle storage facilities across the site which are convenient for all residents. Make all cycle storage facilities, including electric charging, maintenance and non-standard cycle storage accessible to all users. Locate entrances to cycle stores in well overlooked locations that are safe and convenient.

3. Cycle parking design

The provision of secure enclosed long term storage for bicycles is welcomed. The proposed mix of two tier racks and sheffield stands is also supported, as two tier racks are not suitable for all standard bicycle types or users. It should also be noted that two tier racks require a minimum ceiling height of 2.7m, which may be difficult to achieve in a basement.

The provision of cycle pumps, a maintenance station and electric charging points as noted within section 6.2.2 of the travel plan is also welcomed. However no space is identified on the plan for these facilities, as illustrated below.



No provisions have been noted in the proposals to accommodate non-standard bike forms such as recumbents, tricycles, cargo bikes, and adapted bicycles.

Recommendation: Allocate dedicated space for non-standard cycle parking (LTN 1/20 recommends typically 5%). Allocate dedicated space for cycle maintenance and illustrate proposed electric charging locations. Ensure Sheffield stands are proposed as part of the cycle storage solution.

4. Cowley Bridge Road

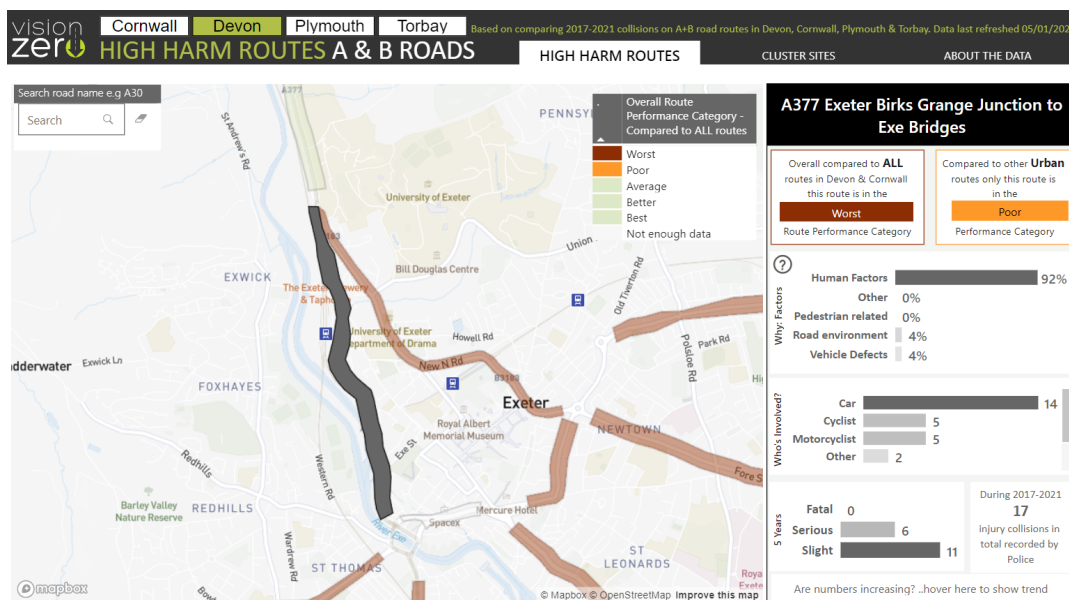
Cowley Bridge Road is poor for cycling. The road has high traffic volumes, including HGV's and tractors with trailers. Between the junction with New North Road and the petrol station there is no pavement beside the carriageway as the road abuts a low brick wall to the West and a high stone retaining wall to the East. A raised path provides a walking route but is unsuitable for cycles due to the low railings and large drop to the road, as seen in the image below.



The section of road immediately south of the junction with New North Road similarly has no adjacent pavement and presents an intimidating prospect to cyclists, as seen in the image below.



The screenshot below shows an extract from Devon County Council's website illustrating 'high harm routes' on A & B roads. It shows that the section of Cowley Bridge Road (A377) south of the site is within the worst route performance category. This short section of road, with anecdotally low cycle usage, has had incidents recorded involving 5 cyclists within the last five years.



Within the draft Local Cycling and Walking Infrastructure Plan (LCWIP) cycle route E19 is proposed from Cowley Bridge to Exeter St David's Station. This will run past the site and provide a much improved connection to the station and the city for the large number of students living in the area and the residents of Duryard and Wrefords Drive.

The draft LCWIP recognises the challenges of this route, and proposes a shared use path. However route E19 is currently given low priority and may not be delivered within the next 10 years. Delivery of this route will be of critical importance to support cycling within the new development and the wider student residential cluster in the long term. Please also see the cycling campaign's response to the LCWIP which has further detailed comments on route E19 on pages 70-71 and can be viewed [here](#).

Recommendation: Ensure a significant financial contribution from the development, through a S106 agreement or similar, is ring fenced for implementing cycle route E19. Ensure proposals for a shared walking and cycling path directly outside the development are compliant with LTN 1/20 best practice guidance and coordinate with proposals for route E19.



We hope that these comments help further improve the scheme, and bring focus on the need to contribute towards longer term improvements to Cowley Bridge Road.

Yours sincerely,

Ben Ayliffe

for and on behalf of:

EXETER CYCLING CAMPAIGN

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