



23/0332/FUL | Construction of 5 dwellings with associated new vehicular access off Blackhorse Lane, parking and landscaping | Land Adjacent To The Gardens Blackhorse

7th March 2023

By Email to: planningwest@eastdevon.gov.uk

Dear Planning Officers,

Exeter Cycling Campaign is grateful for the opportunity to comment on this application. We would like to **object** to this proposal, as the cycle storage provision is insufficient, inadequately detailed and also lacking for one plot.

This small development sits on the E3/E4 cycle route into Exeter, and also close to the Science Park, Sky Park and other areas of employment, as noted in the Design and Access Statement. Facilitating the easy use of bicycles of all types by the future residents for everyday journeys will help the council to achieve its stated objectives around active travel and reduced emissions from private transport.

For all plots it would be important to ensure that the bicycle storage facilities, be they in garages, integral storage rooms or external storage in gardens, include provision for the charging of e-bikes.

Plot 1

No facilities for the storage of bicycles are noted on the combined plans (926.21) or the proposed Site Plan (926-12)/Floor Plans (Upper) (926.13). We presume that the garage is intended for this purpose. The dimensions of the garage appear to be approximately 6m x 3m.

From the [Exeter City Council's Sustainable Transport Supplementary Planning Document \(ECC-STSPD\)](#) :

- *5.2.1 Cycle parking must be secure and convenient. The Residential Design SPD sets out detailed requirements for cycle storage at paragraph 6.56 onwards.*
 - *For a single garage measuring 6m x 3m, 0.5m needs to be added to either the length or the width for bike storage. If added to the length, a personal door should be included so the bikes can be taken in and out with the car in situ.*

It appears that the garage does not fully meet this requirement (there is no equivalent document for East Devon available on the Evidence Base and Supporting [Planning]



Documents). And the only entrance way to the garage for bicycles is through the main vehicular entrance.

As this is a 3 bedroom dwelling, we expect to see sufficient space reserved for the easy storage of at least 3 bicycles, following LTN1/20 guidance, and making allowances for non-standard bicycles.

Plot 2

The combined bicycle and bin storage for this plot looks to be approximately 2.3m x 1.8m, and we are pleased to see the double doors which will be useful for adapted cycles and trailers. However, the ECC-STSPD notes that *"Storage space for bikes is additional to that required for bins; the same space cannot be counted for both."*

And for this 4 bedroom dwelling, LTN1/20 guidance would require space for at minimum 4 bicycles. It is not clear if the space available once shared with bins is insufficient to easily store and access this number of bicycles, especially if some would be non-standard cycles. We would like to see the bicycle storage separated from the bin storage, and be of sufficient space for the easy storage of at minimum 4 bicycles, making allowances for non-standard bicycles.

Plot 3

We welcome the provision of separate integral bicycle storage for this plot, though it is not clear if this area is separated from the rest of the lobby somehow. The dimensions suggest this reserved space only to be 2.2m x 0.7m. This is insufficient space to store the bicycles commensurate to a 4-bedroom dwelling, which following LTN1/20, is at minimum 4 bicycles. The door to this lobby area also needs to be wide enough to allow the passage of non-standard bicycles. We would like to see more space provided for cycle storage in this plot.

Plot 4

No designated bicycle parking is indicated on either the combined plans (926.24) or the proposed Site Plan (926-12)/Floor Plans (Upper) (926.13). The garage looks to be 6.5m x 6.5m which is therefore sufficient to meet the ECC-STSPD requirements. It would nonetheless be important to indicate on the plans where bicycles are intended to be stored for this plot.

Plot 5

The Floor Plans (Upper) (926.13) shows that there will be a secure brick bin/bike store in front of this dwelling, approximately 4m x 1m. No further details are given and so we cannot assess whether the level of security this provides will be sufficient for insurance purposes of e.g. electric cargo bicycles.

For a 3 bedroom dwelling, LTN1/20 guidance requires storage for at minimum 3 bicycles. The ECC-STSPD notes that



- *“Individual stores in gardens should have easy access to the road via a gate. For two bikes, the store should measure about 2m x 1m (a 6' x 4' shed will suffice).”*
- *“Storage space for bikes is additional to that required for bins; the same space cannot be counted for both.”*

With the remaining space after storing bins and recycling boxes being likely less than 3x1m this is insufficient for the minimum 3 bicycles commensurate for this dwelling.

As the bicycle storage for this plot is not part of the dwelling, confirming the ability to charge e-bikes while parked is also important. This storage shelter needs to be improved to separate the bin and bicycle store, and ensure that sufficient space is available for the storage of the commensurate number of cycles.

Design Access Statement:

In the DAS, item 4.5 states “Cycle storage spaces are included within each dwelling to encourage modal shift and, with access to bus routes and local employment, this site is seen as highly sustainable. The proposed cycle routes in the area (for example Blackhorse Lane) provide an excellent sustainable transport option for access to the Science Park and onwards to the centre of Exeter.”

As we note above, Plot 1 is missing designated cycle storage according to the plans, and of the remaining plots, the space reserved for cycle storage is insufficient to facilitate the easy use of bicycles of all types by the future residents for everyday journeys.

It also states *“Each house has two or three car parking spaces arranged in generous garages and drives with level access to the front doors.”* We are disappointed that the generous space for private vehicles has been prioritised over the much smaller space needed to accommodate the numbers of bicycles that a modal shift would entail.

Impact of works

The site is accessed from Blackhorse Lane, which is a quiet lane and part of the E3/E4 cycle route between Exeter and Cranbrook & East Devon. It is important that during the works for this development, the lane is kept clear of parked vehicles as well as mud and other debris. We note that during the construction of the access road, some disruption will likely be necessary, but suitable provision must be made for pedestrians and those on bicycles without requiring them to dismount or take lengthy and strenuous diversions.

In summary, we are pleased to see that provision for cycle storage has already been planned for all but one of these dwellings. However, in most of these cases insufficient space has been set aside for the storage of bicycles, especially when accounting for non-standard cycles, cargo-bikes or child trailers. Further details and improved provision are needed for Plots 1-3 & 5 around the storage of cycles.

We hope that these comments help further improve this application encouraging more active travel and helping the council to achieve its stated objectives in this regard.



Yours sincerely,

Robert Dunn

for and on behalf of:

EXETER CYCLING CAMPAIGN

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