



Planning - Central/East
Planning Development (Central/East)
PO Box 616
Durham
DH1 9HY

4 February 2014

For the attention of Mr Peter Herbert, case officer.
peter.herbert@durham.gov.uk

Dear Mr Herbert,

Re: PLANNING APPLICATION NO CE/13/01696/FPA

Conversion of former hospital and its extension to form 73 student studios, erection of student accommodation building to include 367 bedrooms, demolition of outbuildings and extensions, and cycle storage, parking and altered site access, by Peveril Securities.

I write in connection with the above planning application on behalf of Durham University Bicycle User Group (DBUG). We have examined the application and plans and know the area well. As DBUG have been referenced in the supporting documentation to the planning application (*Transport Statement and Travel Plan* at paragraph 2.3.10) we wish to comment on the development's cycle parking provision and location, and the infrastructure connections with the University and the City.

Cycle Parking Provision

From examining the application it appears that the development will provide 90 cycle parking spaces in a mix of covered and uncovered racks for 440 students and their guests.

DBUG are of the opinion that this is woefully inadequate and has misinterpreted Durham County Council guidelines.

Durham County Council Accessibility & Parking Guidelines 2003 (DCCAPG) state that student accommodation should provide a minimum of:

1 secure cycle space per 5 student beds (Table 1 on p. 28); and

Long stay:short stay ratio @ 1:2 (Figure 2 on p. 6)

It is not totally clear from the document whether short-stay cycle parking spaces for visitors should be in addition to the long-stay spaces for residents (A), or if Table 1 gives the total minimum provision and the ratio of long to short-stay spaces is accommodated within that total (B).

In case A, this would suggest that in addition to 88 long-term spaces for residents, a further 176 spaces for visitors should be provided, making 264 in total.

In case B, the minimum provision would work out as 88 spaces in total, with 29 being long-term for residents and 59 being visitor spaces (i.e. less secure, not covered).

The number of visitor spaces in case A would seem excessive, and indeed the 1:2 ratio in DCCAPG seems highly inappropriate for a residential facility. But in case B, a mere 29 covered spaces for a development for 440 residents is clearly quite insufficient.

DBUG is therefore of the opinion that the Council's current guidance on cycle parking spaces is not fit for purpose, especially when applied to developments intended to be car free. Table 1, after all, allows for a maximum of 1 car parking space per 3 student residents, and given that the development is car-free there should be cycle parking provision far above the minimum requirement if the transport need is to be satisfied. The developers point out (in section 4.2 of the Transport Statement and Travel Plan) that they intend to exceed the minimum provision, but in fact this is by providing 90 spaces rather than 88.

Fortunately the guidance does allow for planning requirements to be varied if the circumstances warrant it. Page 4 of DCCAPG states "Should it appear that in particular circumstances this provision is inadequate to meet the demand for cycle parking then additional provision will be required".

After DCCAPG was adopted, University car parking policy changed to restrict student parking at University academic locations and there has been a subsequent increase in the number of students cycling to campus instead. DBUG would contend that these circumstances call for an increase in provision.

We must therefore look beyond the DCCAPG for more realistic guidelines on cycle parking provision for students. Current Durham University policy is for its new builds to achieve at least a BREEAM Excellent rating. One aspect assessed by BREEAM is cycle parking and the guidelines for developments of student accommodation state a ratio of 1 covered secure space per two student residents. Additionally the University aim to provide 1 visitor space per 4 long stay spaces.

Applying those BREEAM & University guidelines to the redevelopment of the former County Hospital would provide:

220 covered & secure spaces for residents
55 spaces near building entrances for visitors

DBUG is of the opinion that this provision of this magnitude would be 'best practice' and provide sufficient spaces to meet the demand from residents now and in the future.

In case this is thought excessive, may we offer two further examples from other local authorities:

Transport for London: Cycle Parking Standards (proposed guidelines)
<http://www.tfl.gov.uk/assets/downloads/Proposed-TfL-Guidelines.pdf>

Student accommodation: 1 space per 2 students

Cambridge City Council: Cycle Parking Guide for new residential developments (February 2010) https://www.cambridge.gov.uk/sites/www.cambridge.gov.uk/files/docs/CycleParkingGuide_std.pdf

Appendix A: student accommodation: 1 space per 2 students (in city centre areas)
plus 1 visitor space per 5 students

Cycle parking location

The dispersal of cycle parking in small patches around the site, mostly at the rear of the development falls short of best practice. DBUG's concern is that uncovered cycle racks far from well trafficked building entrances would be inconvenient, infrequently used and any bikes left there perceived to be at a greater risk of being stolen. This could encourage the occurrence of 'nuisance' ad-hoc locking of cycles to street furniture in the more highly trafficked areas of the development and locality.

The DFT's Manual For Streets 2007 states:

".. consideration therefore needs to be given to the provision of bespoke cycle storage. Cycles are not suited to overnight storage outdoors as they are vulnerable to theft and adverse weather. At the very least, any outdoor cycle parking needs to be covered, and preferably lockable."

It goes on to say:

"Cycle parking for flats can also be located in communal areas, such as in hallways or under stairs ... Another option is to provide communal cycle-parking in secure facilities, such as in underground car parks, in purpose-designed buildings or in extensions to buildings."

BREEAM compliant cycle storage will be covered, fixed to a permanent structure (building or hardstanding), in a prominent site location that is viewable/overlooked from either an occupied building or a main access to a building (alternatively has CCTV surveillance), lit and close to the entrance.

DBUG comment that as a significant part of the scheme is a new build development and on a steeply sloping site there is the potential for a secure basement cycle storage facility to be created, possibly in conjunction with a more convenient entry to the site (see the next section).

Access to the site

For a car-free development, it is short-sighted that the road access for cyclists is to be provided from the existing access road. This means that cyclists will be joining the road network at an awkward junction involving two right turns in quick succession if heading towards the university. It would be far better to provide direct access onto Sutton Street, closer to the turning with Waddington Street, perhaps in conjunction with cycle storage built into the basement of the new build element of the accommodation.

Infrastructure connections with the University

The transport statement analyses the connections to the university for pedestrians, bus passengers and cyclists. Lack of local cycling knowledge means that this part of the report paints too glowing a picture of the current infrastructure provision. The transport modelling document of the proposed County Plan notes that Durham currently has a low cycling share for

a university town, and part of the reason for this, we suggest, is that the road environment strongly prioritises free flow of car traffic against more sustainable transport options. Nor is the pedestrian environment particularly pleasant when taking the most direct route, as we shall see in the following analysis.

There are also a few factual inaccuracies. Paragraph 2.3.5 of the developer's transport statement mentions that an "advisory cycle route via Quarryheads Lane and South Street provides access towards the Mountjoy site of Durham University". In actual fact, this can only be used in the opposite direction as South Street is currently one-way to all traffic.

Routes to Mountjoy campus

The main route used by cyclists and pedestrians from the development to the Mountjoy campus of the university will go along Sutton Street, the A690, Margery Lane & Quarryheads Lane. See the accompanying map to follow the notes: numbers in round brackets in the text refer to the red numbers on the map, and the route is marked in red.

The route is also used in part by students living in the Viaduct area (1) and by people living in the Neville's Cross area, emerging via Clay Lane (2). Neighbouring Blind Lane is a popular pedestrian route to St Margaret's Primary School. Other pedestrians and some cyclists use parts of the route to access St Oswald's Infant School on Church Street (3).

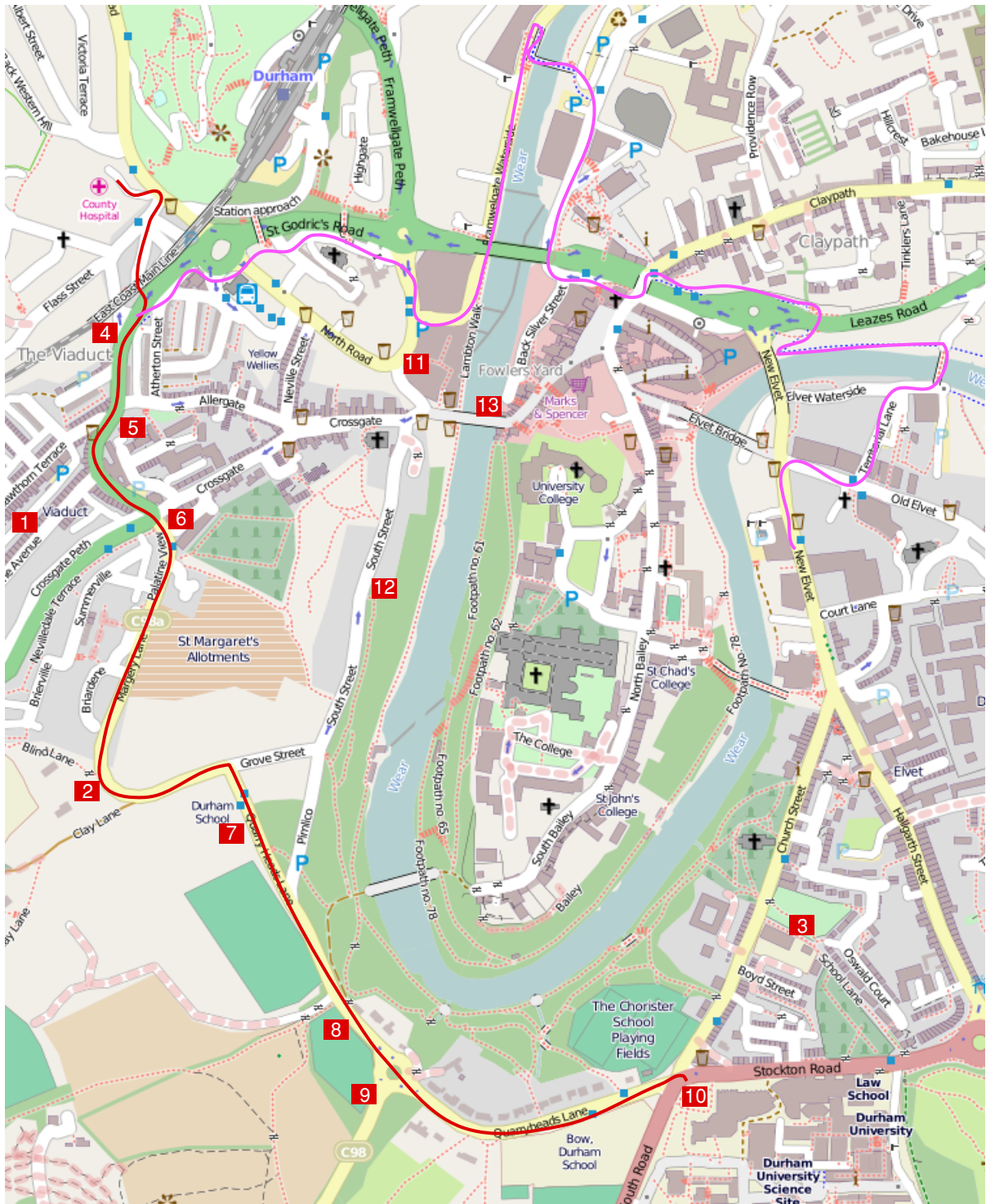
The route begins at the development. At the main site entrance with North Road you can either turn under the railway viaduct on to the main roundabout and then south-west on the A690, or continue via a residential road, Sutton Street. At (4) the NCN14 cycle route (on the pavement) crosses the main road via a badly signed pedestrian refuge. It is not clear to cyclists whether they are really allowed to do this.

The road continues uphill, pretty steeply. It is not a wide road so overtaking by motor vehicles is a hazard. At (5) an on-road advisory cycle lane commences, on the east side of the road only. This continues to the advanced stop box at the junction (6). The lane is useful because it allows cyclists to continue their slow progress up the hill when the traffic is queuing at the lights, but this is the only piece of dedicated cycle infrastructure on the journey.

After the junction, the route continues along Margery Lane. Margery Lane and Quarryheads Lane are used by a fair number of cars, especially taxis travelling from the station to the university & beyond. There are a number of issues facing cyclists and pedestrians along the stretch from (6) to (9).

The road is extremely busy with students walking to the university, but the conditions are sub-standard. The pavement is rarely wider than 130cm along the whole distance. At its narrowest point (7) it is only 80cm including the kerb (this is not the narrowest point of the carriageway either), and from there to (8) is mostly about 100cm wide.

The Department for Transport Local Transport Note 1/12 *Shared use routes for pedestrians and cyclists* (2012) recommends a minimum clear width of 2m for footways, or 1.5m for short stretches. The 2m figure should be increased alongside busier roads (e.g. non-residential) and also increased if there is high pedestrian flow. The route in question has extremely high pedestrian flow and is fairly busy with vehicles. An absolute minimum of 1m is suggested as less than this will not accommodate wheelchairs. To make matters worse, for most of the route there is only pavement on one side of the road. (Note these widths are for dedicated footways, not shared-use with cyclists as might be implied by the title of the document).



Between (7) and (8) there are no drains in the gutter, so during heavy rain a stream up to three feet wide forms in the road. Pedestrians run the risk of being showered by passing cars, and as a cyclist you either have to ride very much further out than usual or accept that you will get home with your shoes soaked. During the autumn there is a lot of leaf fall as the surroundings have a lot of trees.

At (8) the minor road from the river bridge merges in. At last there is pavement again on the other side, and some pedestrians will cross here, particularly parents and children going to St Oswald's school. Crossing the road here is tricky as there is poor visibility in each direction, and there is no pedestrian refuge. The road curves and cars are obscured by a low wall. From

the roundabout (which is excessively big and therefore easy to drive round at speed) cars will approach without warning. In general, the absence of pavement on the east side of the road encourages drivers to exceed the 30mph speed limit, and a similar effect happens on the steep downhill approach to the roundabout from the road marked C98 (Potter's Bank). At the crossing of that road (9) there is an absurdly small pedestrian refuge.

A reasonable number of cyclists already use the route, but there are frequent cases of irresponsible overtaking by motorists, including in the short stretch from the Durham School corner to Clay Lane where the road is not quite long enough to overtake a bike without risking hitting oncoming traffic coming round the blind bends. Less experienced cyclists find this environment very intimidating. There is also the risk of colliding with pedestrians stepping off the narrow pavements, so cyclists need to take up a position in the middle of the carriageway.

Between (9) and (10) the width of the road is generous. If parking or the width of the grass verges could be reduced there would be ample width for a bi-directional segregated cycle route, in line with the Dutch CROW standards, as aspired to in the DCC Cycling Strategy. On such an important route this should be actively under consideration.

Cyclists have few other options for routes from the development to Mountjoy campus. While it is possible to cycle down North Road, it is not in theory permitted to continue right at the Milburngate junction (11) and South Street (12) is one way the wrong way. Framwellgate Bridge is closed to cyclists, being pedestrian only (plus delivery vehicles until 10am).

Routes to the Bailey and Hild Bede campus

There are no routes at present for cyclists travelling from the development to the Education/Hild Bede campus in the east or the University buildings on the Bailey or round New Elvet which are safer, more convenient and more direct than the main road network.

Officially the national cycle network route NR14 would be the appropriate option. It passes close to the site, but its route through the centre of Durham is appalling, involving a steep cobbled street, steps, crossing four lanes of highway and then a choice of detour via Pennyferry Bridge or crossing the busy Milburngate Bridge.

The route in purple on the preceding map shows how to reach the University's Elvet Riverside buildings using the official cycle infrastructure in the area.

The best route to these sites would be via the original route through the town: North Road, Silver Street, and Elvet Bridge, but much of this route is currently (and needlessly) completely prohibited to cyclists.

Suggestions for improvements

DBUG requests that any section 106 contributions by the developer to Durham County Council should be spent on upgrading cycle routes to the university.

DBUG's preferred improvements would be:

- a) Improved junction at Sutton Street and the A690
- b) Margery Lane, between the entrances to Briardene and Clay Lane, to be closed to through motor vehicle traffic.
- c) Reducing the radius of the entries to the Potters Bank roundabout to reduce speeds.
- d) A bidirectional segregated cycle facility, demarcated from the road and the footway, along Quarryheads Land to the New Inn junction, together with an "all green phase"

for pedestrians and cyclists crossing that junction to and from the university.

e) North Road, Silver Street and Elvet Bridge Pedestrian Zone amended to allow bicycles two way access, at least outside peak hours.

f) South Street: to allow two way bicycle access via a contra flow cycle lane.

Notes

(a) Sutton Street / A690 junction

The current junction is designed for high speed vehicle manoeuvres and to prevent 'rat running'. It should be redesigned with tighter radii to reduce vehicle speed and provision made for the extra cycle traffic from the development wishing to turn right and go uphill, such as a Toucan crossing instead of narrow traffic islands.

(b) Margery Lane closure

This would remove a significant proportion of the vehicles using the road reducing demand for carriage space allowing the pavements to be widened and making it a much safer and more pleasant route to use for pedestrians and cyclists. Alternatively a speed limit reduction to 20 mph and traffic calming, such as speed cushions and changes in priority (with cycle by-passes) could be considered.

(c) Potters Bank roundabout

It is futile trying to reduce speeds by educating motorists. Highway engineering plays the biggest part. Tightening the corners at this roundabout and reducing the widths of the approaches to prevent two lanes of traffic forming will improve the safety of vulnerable road users, both cyclists and pedestrians.

(d) Segregated cycle path to New Inn junction

Closing Margery Lane to through traffic, combined with a segregated facility for the stretch of Quarryheads Lane from the roundabout to the New Inn junction will provide a safe environment of continental quality for much of the route in question. It will also assist promotion of active travel to the many schools along this route, and could plug into a wider network if extended along the Stockton Road, or routes via Church Street and South Road.

(e) Reopening city centre streets to cyclists

It is only a generation ago that buses and other traffic was allowed up and down Silver Street and Elvet Bridge, alternating in direction with a policeman controlling the lights from a hut in the market place. When the roads were pedestrianised, bicycles were excluded too, leaving the now congested Milburngate Bridge the only option for crossing the centre by bike. While Pennyferry Bridge has recently been provided it requires a considerable detour and extra descent/ascent. Delivery vans and even large lorries are allowed on these roads until 10am or 11am in the morning.

The roads should be reopened to bicycles as it would provide a cheap, safe route across the centre of Durham. There may be concern about the volume of pedestrians during shopping periods. In the early morning, before 10am, there is no such problem on Silver Street, and Elvet Bridge is clear enough the whole of the day as it has fewer shops. A trial of this could easily be arranged. If successful there would need to be further work at the signalised junction at the end of Old Elvet to allow bicycles to continue straight on and turn right.

(f) South Street

There are quite a few streets in Durham which have been made one-way to all vehicles because they are relatively narrow. Most of them are wide enough for bidirectional traffic apart from the presence of parked cars. A lot of these roads could be made two-way for cyclists to create

alternative routes and a network which gives cycles an advantage. Shortening routes for cyclists and allowing them where cars are not permitted is a key technique behind the Dutch success in cycle share. South Street is one of these roads.

Conclusion

If this application is to be decided by councillors, please take this as notice that DBUG would like to send a representative to speak at that Planning Committee meeting. Please let us know as soon as possible the date of the meeting.

Yours sincerely,

Matthew Phillips