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

10 February 2014

For the attention of Mr Henry Jones, case officer.
henry.jones@durham.gov.uk

Dear Mr Jones,

Re: PLANNING APPLICATION NO CE/13/01667/FPA

Conversion and extension of Neville House and demolition and replacement of Sheraton House to form student accommodation development comprising a total of 424 no. beds and associated works and landscaping.

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 (*Travel Plan* at paragraph 4.14) 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 85 covered cycle parking spaces for 424 students and their guests.

DBUG are of the opinion that this is woefully inadequate and has possibly 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 85 long-term spaces for residents, a further 170 spaces for visitors should be provided, making 255 in total.

In case B, the minimum provision would work out as 85 spaces in total, with 28 being long-term for residents and 57 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 (long to short stay) in DCCAPG seems highly inappropriate for a residential facility. But in case B, a mere 28 covered spaces for a development for 424 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.

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 Neville House and the Sheraton House site would provide:

212 covered & secure spaces for residents
53 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 and type

We have not located any details in the mass of documentation explaining the type of covered cycle accommodation which is proposed.

A large proportion of the cycle racks provided at the University for daily use (i.e. outside lecture theatres, libraries and other non-residential facilities) is sheltered, with a sloping roof, but open on one side. For residential blocks we would expect the cycle parking provision to be fully enclosed to shelter the bicycles from all weather, and for the compounds to be secured and accessible only by residents. Without fully-secured storage the racks could become a target for thieves when unattended during the day or overnight.

Providing cycle storage which is fully secured also entails the provision of adequate spaces for other cyclists visiting the property to lock up their bikes in short-term racks, as discussed above. As the documentation in the application refers to 85 covered cycle spaces, this suggests that either the accommodation will not be adequately secured or there will not be provision for visitors. Inadequate visitor provision could encourage the occurrence of 'nuisance' ad-hoc locking of cycles to street furniture in other areas of the development and locality.

Most of the cycle parking provision is on the edge of the site, behind Neville House along the dustbin access road. The provision is unbalanced relative to the size of the two buildings, with only 23 of the 85 spaces being located next to the replacement for Sheraton House, despite the building housing 45% of the development's residents. Twelve of these are on the very edge of the site and would be quite vulnerable to theft. Considering that these buildings are new build it would seem more appropriate to accommodate the cycle storage within the building footprint in a basement area, rather than it being located in odd corners somewhat as an afterthought. This pattern of cycle parking provision falls short of best practice.

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.

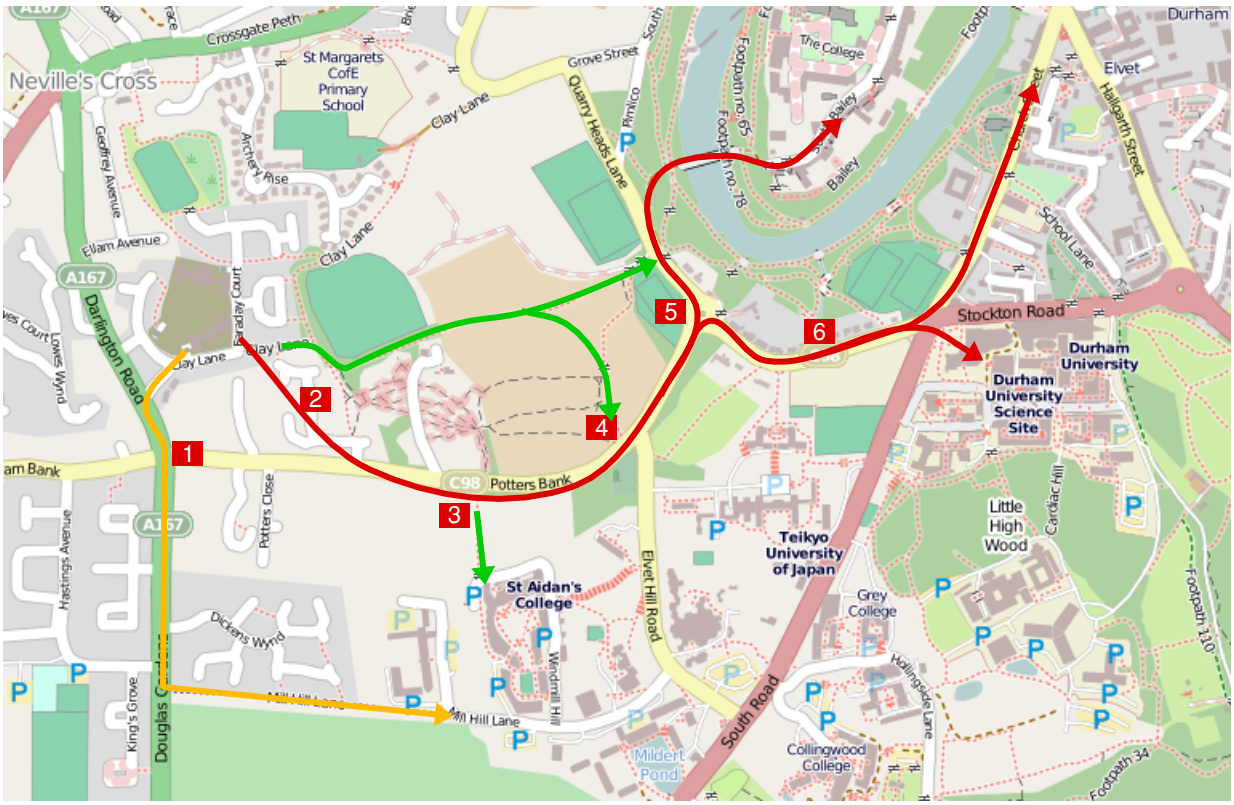
DBUG comment that as a significant part of the scheme is a new build development there is the potential for a secure basement cycle storage facility to be created. We have not examined the plans to see if this is an option with the Neville House conversion.

Brompton Cycle Hire facility

DBUG very much welcomes the idea of providing a Brompton cycle hire station. This would be a great innovation to bring to Durham, particularly as it is intended that its use would be available to residents in the surrounding streets as well as to the student population. We would like a commitment to expansion of the scheme from the initial ten places if it proves successful. As the scheme would be open to other local residents, it should not be counted towards the total cycle parking provision for residents on site.

Infrastructure connections with the University and city

DBUG welcomes the suggestion that Section 106 payments would be used to upgrade the footpaths and other facilities in the neighbourhood to allow for the likely substantial increase in pedestrian and cycle traffic. In the following sections we would like to suggest routes likely to be used by students which could benefit from improvement. The details are given in the subsequent sections of this document.

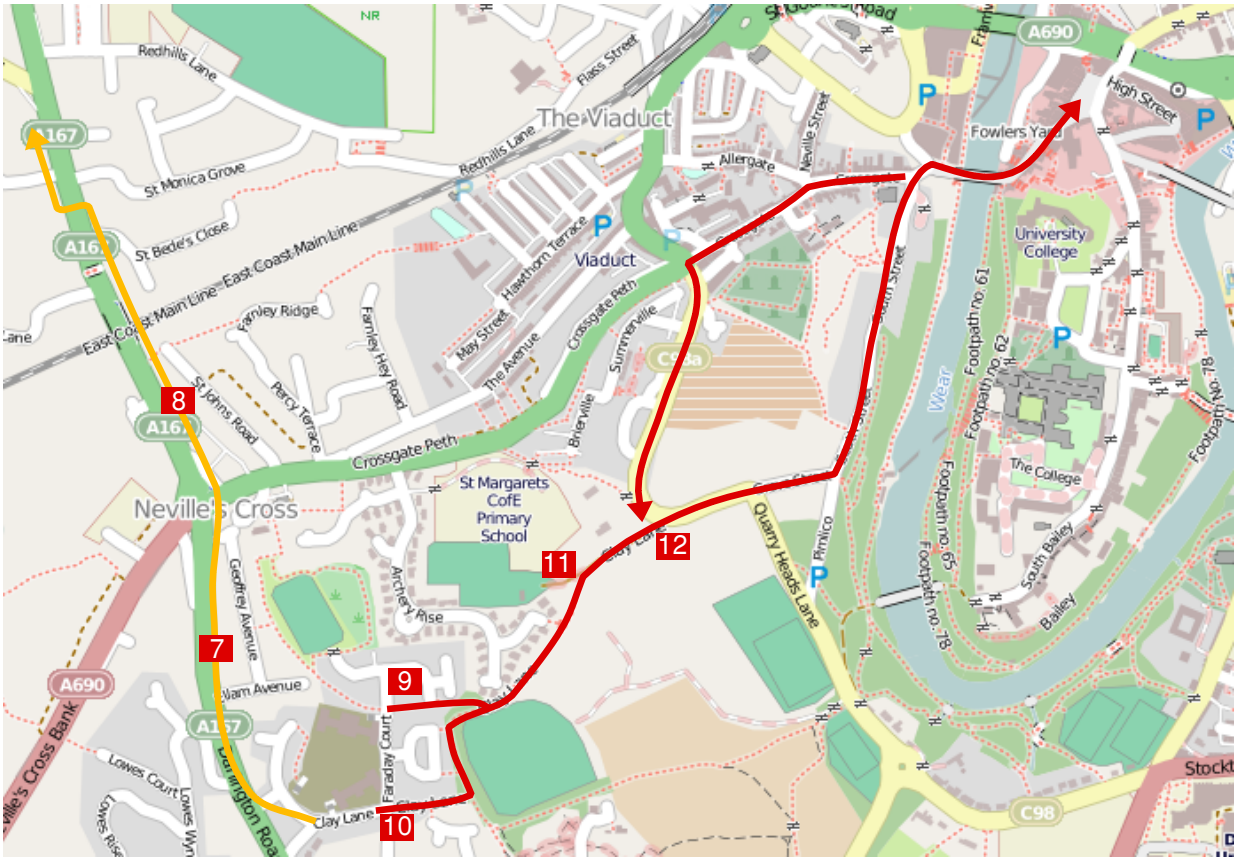


The map above shows the most direct routes available at present by bike to different parts of the university. The orange line leads to the Business School and some of the Hill Colleges. The red line is the obvious route leading to the Bailey via Prebends Bridge, the lower Mountjoy campus (science site) and via Church Street to the Elvet Riverside buildings and the Education / Hild-Bede campus via Baths Bridge. Elvet Hill Road offers access to colleges and the upper Mountjoy campus but for most buildings it is less direct than the combination of Potters Bank and Quarryheads Lane.

The main additional route available to pedestrians is that via the Observatory to Quarryheads Lane or the Potters Bank / Elvet Hill Road junction, and a footpath from Potters Bank to St Aidan's College (green arrows).

The following map concentrates on routes to shops and the city centre. A new supermarket is proposed to open on the A167 in Crossgate Moor. If promoted to the residents it could prove

popular because of the shorter distance and the relatively level route to access it. This is the route marked in orange.



The most direct route to the town centre is that shown in red. The route into town, via Clay Lane and South Street, is entirely along footpaths or quiet residential roads. But as South Street is currently one-way for all vehicular traffic including bicycles, students would have to return via Crossgate and Margery Lane, a much busier route, with a dangerous right turn to gain access to Clay Lane.

Note that Clay Lane is currently not officially open to bicycles, but is really the most practical route from the development into the town centre, and upgrading this route for shared use would benefit a lot of residents south of Neville's Cross.

Summary of suggested improvements

DBUG's preferred improvements to footpaths and cycle routes (on and off road) are these:

Route to Business School

- Widening the shared-use path along the A167 south from the development.
- Measures to reduce incidence of speeding on this section of road.
- Retiming of traffic lights at Duke of Wellington junction to allow more time for west-east cycle traffic, together with better access to/from the A167 cycle path.
- Junction improvements at Dickens Wynd (A167) to give priority to cyclists and pedestrians.

Routes to University buildings on Bailey, Lower Mountjoy, New Elvet etc.

- Extending pavement round the corner from Westhouse Avenue to assist pedestrians in crossing Potters Bank.
- Removing parking spaces from the lower part of Potters Bank (from Elvet Hill Road to the roundabout) and conversion to an uphill 'crawler lane' for cyclists.
- Provide on-road west-bound cycle lane on Potters Bank all the way to Duke of Wellington junction to allow cyclists past queuing traffic.
- Speed cushions, or junction realignment, to improve the safety of the Potters Bank / Elvet Hill Road junction.
- Redesigning the roundabout at the foot of Potters Bank to reduce speeds, increase the size of pedestrian refuges, and improve safety for cyclists.
- Provision of a bi-directional fully segregated cycle route along Quarryheads Lane from the roundabout to the New Inn junction, together with an 'all green' phase for pedestrians and cyclists to give easy access to and from the University campus.

Route to local supermarket

- Upgrading the shared-use provision north along the A167 as far as the planned supermarket in Crossgate Moor.

Routes to city-centre

- Upgrading Clay Lane from the development to junction with Margery Lane: widen the path where necessary and improve the surface, especially on the tennis club drive and the muddy paths approaching Margery Lane. Opening the whole route to cyclists as a shared-use path.
- Margery Lane, between the entrances to Briardene and Clay Lane, to be closed to through motor vehicle traffic, or alternatively, strong measures to improve the safety of the Clay Lane / Margery Lane junction for pedestrians and cyclists.
- Opening South Street two-way to cycle traffic.
- Reopening Framwellgate Bridge and Silver Street two-way to cyclists, at least during the times when deliveries are permitted, outside peak shopping hours.

Details of suggestions

Numbers in parentheses the following notes refer to the maps above.

Route to Business School

The route alongside the A167 is shared-use pavement, i.e. a pavement with signs permitting its use by cycles and no demarcation between cyclists and pedestrians. At the Duke of Wellington crossroads (1) there is a toucan crossing for north-south travel on the shared-use pavement, but no obvious safe connections to the road network for cyclists to leave or join the route to head east or west.

Although the pavement has been widened in the past it is still only 2.4 m wide for most of the length. The Department for Transport document LTN 1/12 *Shared Use Routes for Pedestrians*

and Cyclists recommends (para. 7.34) a preferred minimum width of 3.0m, with wider routes being provided where possible. It also recommends for routes alongside roads with 40mph limits or above (as this is) that a margin strip should be provided as a buffer zone (para. 7.36), of at least 0.5m (para. 7.60).

Although there is a narrow grass verge between the shared use path and the carriageway along part of the A167, for much of the stretch in question the pavement comes right up to the kerb. The design of the adjacent road, with three lanes approaching the traffic lights, merging into two lanes beyond the lights, and a wide white-hatched centre strip, encourages speeding, and it is already a 40mph route. Walking with children along by this road to the local park, or to and from the local primary schools, can be a worrying experience and such an environment is likely to discourage active travel, thereby adding to congestion.

There is, however, much scope for improvement: a wide grassed area exists between the pavement and the houses on the east side of the road, which could allow for the pavement to be widened further, or for a new path to be created further from the road. Where the space is more constrained, approaching the junction, it is primarily because the road is in five lanes. A reduction in the number of lanes, which are only useful at peak times, and reallocation of some road space to pedestrians and cyclists, would help to promote sustainable travel options.

At the junction with Dickens Wynd, the radius of the curve into the side road is very wide, making this junction more of a hazard for cyclists as cars do not need to slow down very much. The word 'SLOW' painted on the road just inside the side road suggests that re-engineering to tighten the corners would be beneficial, and a raised junction table to give clear priority to pedestrians and cyclists should be provided. Interestingly there are no 30mph signs on entering the road either.

Routes to other University buildings

The development is already connected to Potters Bank via Clay Lane and Westhouse Avenue, where bollards prevent through motor traffic (2). Alternatively the neighbouring footpath, FP127, leads from Clay Lane to Potters Bank avoiding the houses in Westhouse Avenue. This footpath is often muddy and would need upgrading if it were to serve as the main route for pedestrians.

Potters Bank has no pavement on the north side at present. The pavement of Westhouse Avenue would need extending round the corner onto Potters Bank to provide a safe place to cross the road.

The developer's *Travel Plan* comments (4.13) that it is 'reasonable to cycle on Potters Bank' and indeed cyclists currently do, but more by necessity than choice, and the road could do with a number of improvements if the development is to be successful as car-free student accommodation.

The principal problem is the speed of the traffic. Although it is notionally in a 30mph zone, members' experience is that cars rarely abide by this limit. This is partly because the cues that motorists expect for a 30mph limit are absent: there is little housing along the road and no pavement but fields on one side. Travelling east the road descends steeply, so cyclists can easily exceed 20mph. Despite this cars often attempt to overtake quite fast, even on the blind bends.

A particularly bad spot is the junction with Elvet Hill Road (4). Cyclists turning right from Potters Bank into Elvet Hill Road have to approach with caution as it is not possible to see vehicles ascending Potters Bank until the last moment. We are thus vulnerably placed in the middle of the lane and at risk of being struck from the rear by a speeding car. It is similarly

precarious turning right out of Elvet Hill Road.

There is plenty of space at this junction, and it could be remodelled to swing the westbound lane into the end of Elvet Hill Road and create a central refuge on Potters Bank for cyclists turning, together with pedestrian facilities for those emerging from the footpath. Speed cushions or other traffic calming measures could be used. Perhaps fixed speed cameras or more frequent policing should also be considered?

It is also worth noting that on Elvet Hill Road, despite it being reasonably wide, the pavement on one side is very narrow and eventually gives out altogether. This should be dealt with: considering the numbers of students living nearby, there should be a decent width of pavement on both sides.

When travelling east to west on Potters Bank the cyclist encounters different issues. On the lower stretch (between (5) and (4)) cyclists travel slowly up the steep hill, with any cars following being impatient to overtake. The situation is made uncomfortable by a long row of car parking spaces. If any of these are occupied, cyclists have to move out into the middle of the lane and the likelihood of aggressive or risky overtaking by drivers is increased. It would be very helpful if these parking spaces could be abolished and be replaced by double-yellow lines and a mandatory uphill cycle lane of a good width. As there are no adjacent properties it should be possible to abolish the parking spaces without serious objections. West of Elvet Hill Road it would be useful to provide an on-road advisory cycle lane, which would be possible within the existing road width, because having rushed up the hill cars are often forced to queue for the traffic lights and a considerable tail can build up. A cycle lane here would allow cyclists to continue safely past the queues. There is currently a tendency for cyclists to take to the pavement instead, which causes nuisance for pedestrians. Safety improvements, reduced speed, and cycle lanes would help mitigate this.

The roundabout at the foot of Potters Bank (5) is large and easy for cars to negotiate at speed. The approaches are wide enough for two lanes to form entering the roundabout. These features make it much more dangerous for cyclists and our members have experienced near-misses at this roundabout. The pedestrian refuges for crossing are also very small and inadequate for the high level of foot traffic. It is futile trying to reduce speeds solely by educating motorists. Highway engineering plays the biggest part. Tightening the corners at this roundabout and reducing the widths of the approachs to prevent two lanes of traffic forming will improve the safety of vulnerable road users, both cyclists and pedestrians.

The final section of the journey to the Mountjoy campus along Quarryheads Lane (6) can also be quite hostile at times. Again, speeding can be a problem, with cars rushing to beat the traffic lights. The total width available here, with adequate pavements, grass verges, wide carriageways and a line of parking spaces on one side would permit the provision of a bidirectional segregated cycle lane on the Dutch model. The current Durham cycling strategy aspires to follow the best UK and Dutch standards, with the CROW cycle facilities manual being mandated. The volume of cycle traffic along this route would fully justify such provision, and it would assist with promoting cycling to local schools. If this option were adopted then the authorities should also consider abolishing the roundabout and connecting the cycle lane directly with the route to Prebends Bridge.

Route to local supermarket

The nearest supermarket to the development is likely to be the proposed Sainsbury's at the former Pot & Glass pub, in Crossgate Moor. There is already an off-road shared-use pavement all the way, but like the route south along the A167 is is quite narrow in places and not ideal for cyclists sharing with pedestrians. Particular bad spots are:

- by the car hire outlet (7), south of Neville's Cross junction, where there are often cars parked on the driveways, blocking the pavement;
- approaching Neville's Cross junction from the south, with narrow pavements and railings reducing the effective width near the pedestrian crossing;
- continuing north from Neville's Cross, where the route is again very narrow with railings near the end of George Street (8).

North of George Street there is some derelict land, and if a strip could be purchased the cycle and pedestrian provision could be made much better. But round the junction there is little that can be done without a complete re-think of priorities.

In general along this route there is a tendency for vehicles to park on the pavement, blocking it for cyclists and pedestrians. It is likely that, following the opening of the supermarket, we will see more of this anti-social behaviour and it would be good if more effort could be put into enforcement.

The main problem round the Neville's Cross junction is the amount of space given over to road vehicles, to the detriment of cyclists and pedestrians. The junction is designed to maximise high-speed flow, and over the years the convenience of pedestrians has been gradually eroded as extra lanes have been added in an attempt to build our way out of congestion. For example, to reach Neville's Cross Primary School on the other side of the A167 you have to cross four stages of pedestrian crossing, all in separate phases.

Routes to city-centre

None of the routes currently available to cyclists to reach the city centre from the development are very satisfactory. The problems of Potters Bank have already been noted. Crossgate Peth is very much dominated by heavy traffic.

The developer's *Travel Plan* notes (4.12) the possibility of using the A167 path to access the National Cycle Network route to the city centre via Redhills Lane, but this would hardly be a practical route as it is indirect, very steep, and is highly unsatisfactory through the town centre.

Thus we would suggest that upgrading Clay Lane, currently a public footpath, would be the best solution to providing a cycle route to the town centre. It is already wide enough for much of its length. The surface could do with improving in a number of places. Access could be from the Neville House end of the site (9), via the existing footpath (FP11), which might need widening

in places. Access from the Sheraton House end of the site (10) is already good, but for pedestrians a little more pavement would be useful to gain the boundary of the Sheraton Park estate.

After the two routes meet, there are a few tight spots that could do with widening, but there appears to be width available within the current boundaries. It would need sensitive handling to preserve the character of this path.

At (11) the footpath meets the drive to the tennis club. From there to Margery Lane (12) the surface could do with considerable improvement. We understand it is currently maintained *ad hoc* by the tennis club. As Margery Lane approaches, a couple of paths diverge from the main drive. These could also do with better surfacing and maintenance as they are frequently muddy.

The most serious issue with this route is the junction with Margery Lane. Although a footway continues on the south side of the road on the Durham School side, the pavement going north gives out as the Blind Lane footpath (FP18) turns off. Pedestrians have a tricky road crossing to make on a blind bend.

Outside the scope of this submission, DBUG would like to see the route from the railway station to the University improved for cyclists and pedestrians. Margery Lane forms part of that route and the DBUG preferred option is for Margery Lane to be closed to through motor traffic between Briardene and Clay Lane. If that is not possible, there need to be substantial traffic calming measures taken and a 20mph limit applied to this road. We would contend that the present proposed development is a further reason for tackling this issue, and we would ask that some of the Section 106 payments be put towards an improvement of the safety of this route.

While pedestrians have the option of walking via Margery Lane to get to the shops in North Road, or via South Street to reach the town centre, cyclists only have the choice of the A690 or South Street. On returning from the town, South Street is unavailable as it is one-way, so Crossgate or the A690 are the only options.

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 car traffic apart from the need to accommodate 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, and we would suggest that it be reopened to two-way cycle traffic while remaining one-way for motor vehicles. There also needs to be a change to permit right-turns out of the bottom of South Street for cyclists: currently a no-entry sign forces all traffic to turn left up Crossgate.

Regulations on cycle contraflow on one-way streets have been relaxed, and it is the DfT's intention to remove the requirement for a Traffic Regulation Order in 2014. CTC, the UK's national cyclists' organisation, recommends that local authorities review all one-way streets and open up as many as possible to cyclists: http://www.ctc.org.uk/sites/default/files/file_public/contra-flowbrf.pdf

Finally, to complete the route, we would request that Framwellgate Bridge and Silver Street be reopened to cyclists, preferably permanently, and at the least outside peak shopping times. Pedestrianised town centres on the continent generally permit cycling. The DfT document *Cycle Infrastructure Design* (LTN 2/08) covers cyclist access to vehicle restricted areas and is generally positive about the approach. In general, when new pedestrianised areas are being introduced the document recommends retaining access for cyclists. It is acknowledged that reintroducing cyclist access to a pedestrianised area can be more of a problem (in terms of objections rather than safety) but that temporary trials and time restrictions are useful tools to

apply in these cases.

In view of the fact that alternative routes are currently either unsafe or much longer, DBUG urges that access be trialled and introduced as soon as possible: this would be a quick, cheap and very useful change to the cycling network of the city.

Summary

DBUG welcomes the suggestion of a car-free development on the site, providing this is effectively policed by the management of the complex. The surrounding estate is already high density and extra cars would be hard to accommodate. As student parking is heavily restricted at University sites and the distances are easily walked or cycled, there should be little need for most students to bring a car to Durham. Rebalancing the city's student accommodation towards car-free properties will help to reduce traffic congestion and demand for parking. Helping young adults, at their first taste of independence, to break free of the predominant car culture of modern Britain will have long-term health and economic benefits.

To realise these benefits fully, there should be a considerable increase in the number of cycle parking spaces provided, and more consideration needs to be given to the design, location, and security of these. The Council's guidelines (dated 2003) should be revised to take account of national standards and the increased popularity of cycling.

The Brompton Cycle Hire Dock is a very welcome innovation.

We have suggested improvements to various routes, to maximise the success of the car-free proposals. It is not sufficient to provide a route for cyclists as far as the nearest road and leave it at that: the complete route to university and shopping sites should be considered, particularly as this development will result in greatly increased pedestrian and cycle flows, sometimes along new axes. A greater proportion of the Section 106 payments should be devoted to active travel infrastructure improvements (for example, by reducing the sport and leisure contribution, as students are already well-provided with facilities). Footpath and cycle improvements will in themselves also benefit leisure options for local residents.

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