

# SPOKES

*The Lothian Cycle Campaign*

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Dear Michelle

## **CONSULTATION ON SUSTAINABILITY LABELLING WITHIN BUILDING STANDARDS**

<http://scotland.gov.uk/Topics/Built-Environment/Building/Building-standards/publications/pubconsult>

I am writing with comments from Spokes on the above, which has come to our attention through a project we are currently running on tackling the inadequate provision of bicycle storage in flats and tenements – a problem recognised by Edinburgh City Council as having a deterrent effect on levels of cycle use in the city. A 100-person survey undertaken as part of our project found 86% of respondents experiencing some difficulty in domestic cycle storage, with one-third saying this stopped them using their bike as much as they would like. Of particular relevance to your consultation, residents of new-build developments experience their fair share of problems – and that is despite the existing local authority design standards, etc. Papers on our project can be found here...

[www.spokes.org.uk/wordpress/downloads/technical-and-research/spokes-tenements/flats-bike-storage-project/](http://www.spokes.org.uk/wordpress/downloads/technical-and-research/spokes-tenements/flats-bike-storage-project/)

Next, we have to say that we are very surprised that no cycling organisations are on your very extensive consultation list. In our own case, we have corresponded with your Division (Stuart Watson) on this very matter during the present year.

Turning to the draft proposals, we welcome the fact that they do now recognise that bicycle storage is an issue to be considered in the design of new buildings [section G6 and Annex B of the draft proposals]. **Having said that, the proposed standards are seriously inadequate - particularly given the Scottish Government target for 10% of all trips to be by bike by 2020. It cannot be right for one branch of government to set such a target whilst another branch sets standards which are wholly discordant with that target.**

***First, the level at which bicycle storage is even recognised in the draft standards is far too low.***

Under your current proposals only 'gold standard' will give developers credit for including bicycle storage. Yet clearly only a minority of developments are expected to reach gold standard ... *“The second optional upper level ‘gold’ is a more demanding target, initially aimed for by those intent on pursuing best practice.”* Thus there will be no incentive for the provision of cycle parking in the majority of new housing. Indeed the standards – which presumably are intended to give a positive message encouraging developers towards best practice - in fact do the opposite: they suggest that cycle parking is necessary only in the most innovative and exemplary projects – not in the ordinary housing inhabited by the bulk of the population.

Furthermore, standards and awards should be leading current practice rather than following it. Yet already a not insignificant number of developers not only provide cycle storage but also include this in marketing material as a selling-point. This again points very strongly to cycle storage being a basic requirement, not an added extra applicable only to a gold standard building.

Similarly, some local authorities already require cycle parking provision in **all** new housing – whether they reach bronze, silver or gold on overall sustainability, cycle parking is an essential requirement. For example, Edinburgh's parking standards ([www.edinburgh.gov.uk/download/downloads/id/1515/parking\\_standards](http://www.edinburgh.gov.uk/download/downloads/id/1515/parking_standards), table 1B). Thus without any additional effort at all by the developer, every new building in Edinburgh will meet (and indeed will exceed) your gold standard in respect of bicycle storage. **The standard will therefore provide no incentive for additional effort in this respect by the developer** – surely the aim of such a standard!

**Second, the proposed gold standard for cycle storage is itself far too low**, providing only for 1 bicycle *or* 1 pram – i.e. a gold standard which does not allow for family cycling, or even husband and wife cycling, or even any cycling at all if the household has a pram. Surely even the bronze level should meet, or indeed exceed, such a standard! Edinburgh's bicycle storage standards, for example, require a minimum of 1 cycle space per studio flat, 2 for other flats, and either 2 or 3 per house, depending on house size. However, we do note that Annex B refers to 2 bicycles for houses of a certain size, and therefore part of the problem may be that the wording of section G6 has inadvertently not covered that situation (although neither has it covered flats sufficiently).

For flats in particular, there can be an important role for **communal bike storage** – as long as it is well-designed and well-managed. Communal storage is mentioned in Annex B (see below) but in our view is of sufficient significance that it should also be mentioned here in the main text.

One area where existing bike storage standards can fall down (particularly for communal storage) is in being a box-ticking exercise rather than leading to bike storage which is properly designed, thought-out, enforced, maintained and managed – this is also mentioned in the second bullet point below. Thus whilst all new housing should incorporate bike storage as a basic necessity, it may be that a criterion for gold standard could relate to the quality of the design and, if appropriate, the management procedures for the storage.

**Finally**, we comment on Annex B, which defines the **mobility space**...

- ◆ For those premises (i.e. most premises in our view) which require space for 2 or more bicycles the space provided would need to be larger than stated in the Annex.
- ◆ We are not technically familiar with the actual space required to cater for every type of bicycle, but we note that Edinburgh's standards require 1.5m width as compared to 0.75m in your standards – a major difference. The wording of the two documents is rather different, and the Edinburgh standard may include some passing space, or could possibly be the space for 2 bicycles – however the discrepancy should be checked to ensure that your standard for one bicycle is indeed adequate for that, and also to ensure adequate space if, as we suggest, the standard is increased to 2 bicycles for all but studio flats. Further information on recommended dimensions can be found in the Cambridge Cycling Campaign document, *How to Provide Cycle Parking: a Step-by-Step Guide for Planners and Providers* at [www.camcycle.org.uk/resources/cycleparking/guide](http://www.camcycle.org.uk/resources/cycleparking/guide).
- ◆ **Communal storage**, as mentioned in the Annex, is certainly an option for flats, and may often be the best solution. However in that case an essential requirement not covered in the Annex is security and management – there are many unfortunate examples of communal provision by developers which is unused because bicycles are liable to theft or damage. It would be a mockery for communal storage to qualify the developer for a gold standard (or indeed any standard) if it is unusable for reasons of security or management – that would be box-ticking of the worst order! Important features of communal storage should include well thought-out ground-level access, lighting, adequate capacity, signage (so that new residents are aware of the provision), shelter from weather, security, key management, arrangements for cleaning, etc, etc.
- ◆ The Edinburgh parking standards referenced above provide further useful comments on the design and location of communal storage [see notes to Table 1B of the standards].

**In conclusion**, the proposals for bike storage within sustainability labelling should be far more robust, including...

- ◆ Cycle storage should be acknowledged to be a basic requirement for all new buildings
- ◆ The gold standard should be used to recognise storage (and its management) which goes well beyond the acceptable minimum; not to set a minimum – and indeed one which is way below existing best practice

We hope these comments are of use and will be used to bring the proposed standards fully into line with the government's target and aspirations for cycle use across Scotland.

Yours Sincerely  
Dave du Feu, for Spokes