NOTE: this was the first Planning App we are aware of where the new <u>Cycle Parking Factsheet</u>, which was published by the Council Planning Committee in December 2021 should apply – but it doesn't look like it was used! The factsheet is factsheet C7, and forms part of Edinburgh Design Guidance.

22/00670/FUL - New Market Road including homes for rent and student accommodation

Spokes objects to this development because there is insufficient detail in relation to cycle parking to give reasonable assurance that what will be provided will be of sufficient quality, in line with the Council's cycle parking guidelines.

The number of cycle parking spaces, and the location of bike stores in the proposed development are clear enough but Spokes has seen no detail in the planning application documents, as to the layout of the cycle stores or the types of stand that it is intended to use in them. In addition there is scant detail provided about how security will operate in the communal bike stores. We are concerned about the following -

- 1. Space allocation to provide secure cycle parking spaces of sufficient quality. If the figures given in the architects drawings, contained within the transport statement are to be relied upon then the areas of the cycle stores do not appear sufficient to support the number of cycle spaces indicated. In general the various cycle stores show a ratio of cycle spaces to square metres of nearly 1 space to 1 square metre. This seems impossible because a bicycle requires about 2 square metres. If two tier racks were used, two bikes could occupy 2 square metres but that would be two cycle parking spaces in isolation. The planned cycle stores will have multiple parking spaces in close proximity and to be effective they need adequate circulation space to enable easy access to all the spaces. There is also the need to meet the Council's factsheet requirements that, A) 20% of spaces should be for non standard bikes; and B) that 50% of spaces are single tier spaces. In conclusion we cannot see how the floor area of the planned cycle stores can provide the total number of useable secure cycle parking spaces claimed.
- 2. Type of stands to be used. The Council's cycle parking factsheet promotes Sheffield stands (racks) which allow a bike to be wheeled into place and secured. This is convenient and straightforward for users. The type of stand it is intended to be used in the development is not clear, however photos contained in the transport section of the design and access statement, which hold the bikes at 45 degrees, require that bikes be lifted or pushed up raps to be used. This type of arrangement is far less convenient for all users and will render the parking unusable by anyone lacking the strength to push-up or lift bikes into place. These type of racks certainly breach the spirit of the factsheet, if not its terms,
- 3. **Security of communal cycle stores**. Security of cycle stores is absolutely vital. If security cannot be relied on the cycle stores will not be used and all the cost and effort of providing them will have been wasted. There is some mention of achieving security in the application but it is our view that it is insufficient. The planning application should contain a commitment by the developer that all secure cycle parking will have effective access control provided for the lifetime of the development (for students and rental tenants alike).

4. Planned secure bicycle storage in private gardens. A total of 92 cycle storage spaces are planned of this type but how security is achieved is not clear. Spokes is of the view that storage containers would be needed to achieve a satisfactory level of security. Simply locating a bicycle locking point within a private garden would not meet the requirements for security set out in the Cycle Parking factsheet.

In light of the points above, Spokes is of the view that detailed plans of cycle stores, including the type and layout of stands is essential in planning applications if this one opportunity for the public to comment on plans is to be sufficient to ensure good quality cycle stores are created that meet the Council's cycle parking requirements.

The Developer makes some effort to promote sustainable modes of travel including through the use of Travel Plans that make clear the active travel routes and destinations that can be easily accessed from the site. This is welcome but we would like the commitment to be clear, that all new student and rental tenant intakes over the lifetime of the building, would receive a travel plan welcome pack, updated when appropriate, as well as providing information to newcomers of their entitlement to access secure cycle parking.

March 2022 – Submission by Spokes, the Lothian Cycle Campaign.