

Local Plan Inquiry:
Cycle Parking Standards

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1. Background

Cycle parking is a key aspect of the cycling experience, much as car parking is to motorists. Given that some 25% of journeys to work in Cambridge are made by bike, twice as many as in any other UK city, it is important that this key aspect is well provided for.

Good quality cycle parking:

- Deters thefts from taking place;
- Is convenient and easy to use, and provides people with an incentive to cycle rather than use the car;
- Stops bikes blocking pavements and other areas.
- Is highly efficient: some 10-12 bikes can be parked in the space of a single car.
- Is inexpensive: land usage costs are lower than for car parking; a stand for two cycles costs about £100 including installation.

2. Summary of our concerns about cycle parking

Cambridge Cycling Campaign has campaigned over many years on a range of issues relating to unsatisfactory provision of cycle parking. Our key concerns are:

1. Most importantly, the shortage of cycle parking virtually everywhere in Cambridge, both in public and private areas:



Cambridge station and St Andrew's Street – bikes everywhere

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2. Lack of enforcement of the existing Cycle Parking Standards.
3. Cycle theft which the police have made clear has increased considerably in the last few years.
4. Provision which fails to meet best practice:
 - i. Cycle parking which is insecure because the frame of the bike cannot be locked to an immovable stand.
 - ii. Stands which fail to support bikes properly
 - iii. Stands which are too close together (one metre between stand centres being best practice);
 - iv. Rows which are too close together
 - v. Stands which are too far away from cyclists' destinations
 - vi. Ideally cycle parking should also be covered by roofing

3. Scope of Local Plan

We recognise that cycle parking on the highway is beyond the scope of this Inquiry, which is focused on new developments and changes of use.

However it is important to put provision of cycle parking in such developments in the context of (i) the high rates of cycling and (ii) the long-existing shortage of cycle parking.

4. Issues raised in our response to the October 2004 Local Plan consultation, submitted in December 2004

Our concerns were as follows (re-ordered here for clarity):

1. Lack of adequate enforcement of the existing standards
2. Need for greater clarification of cycle parking requirements in the planning process as an aid to enforcement, e.g. through a requirement that an adequate pro-forma on provision of cycle parking be filled in when a planning application is submitted.
3. That standards are being revised downwards in the draft plan, particularly student cycle parking
4. That cycle parking should be located closer to the development than car parking (other than disabled car parking)
5. The need for commuted payments or their equivalent
6. The use of "should" rather than "must" in the text, given that the standards are mandatory
7. Concerns about the inclusion of high-capacity stands which are awkward for elderly cyclists and others and for some types of bicycle; lack of clarity about where such stands can be used.

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(We also pointed out two sets of badly-phrased wording which have been subsequently accepted by the City Council and hence ourselves.)

Before discussing these points, I must state that we feel it disappointing that the very Officer of the City Council charged with promotion of cycling should be in the position of arguing for weakening of the standards.

5. Discussion of these issues

Point 1: Enforcement of the existing standards

This has to be key. Whatever mechanism is employed, there is absolutely no point having standards set out in the Local Plan if they are not enforced.

It seems clear to us, given the number of defective planning applications on which we have had to campaign over recent years, that existing standards have not been properly enforced.

As a means of demonstrating the background to the points I will later make, the following are examples of where effective enforcement has been defective:

- Grand Arcade: 537 spaces in total are to be provided. Over 135 existing spaces are to be removed, a net increase of only 400 spaces. Our calculations show that this falls far short of the amount required, in the area with arguably the most excessive demand for cycle parking across the whole of Cambridge.

Furthermore, the location of the cycle park fails the accessibility requirements of the Standards. It is not “near the main entrance to buildings” as the standards require; instead the entrance is round the opposite (less accessible) side of the building and has resulted in extensive negotiations to make it reasonably accessible via a cycle contraflow. However, this defective planning application was approved.

- Bradwell’s Court: Despite also being in the area of greatest need, absolutely no cycle parking for shoppers or visitors is being provided despite the requirements of the Standards. This is completely and utterly unacceptable. Provision is being made only for on-site residents and employees.



(St Andrew’s Street – by Bradwell’s Court)

- Rat and Parrot Public House, Downing Street: this replaced an estate agent. No customer cycle parking is available – indeed, there are notices outside indicating that cycle parking is not permitted, a clear indication of demand in the area.
- Cambridge Leisure Park – provision short of the required standards (though acceptable under the revised Standards which have lower levels).

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- Cheffins estate agent and auction rooms on Cherry Hinton Road (part of the Cambridge Leisure Park development): deficient levels of cycle parking provision.
- Flats fronting Cherry Hinton Road (part of the Cambridge Leisure Park development): only 'wheel-bender' stands provided, a design not acceptable under the Standards.



(The stands do not enable the frame to be secured)

Point 2: Use of a pro-forma to aid compliance

We suggested that developers should have to submit a council-supplied pro-forma as a means to clarify requirements and to demonstrate that the levels of cycle parking proposed meet the Standards. At present, given the above examples, it is clear that existing procedures are inadequate.

Such a pro-forma would take the format of a simple form containing the same table as the Standards themselves, but with an additional two columns to enable (i) the category and gross floor area and (ii) the resulting number of cycle parking spaces to be entered. It is then a simple matter to calculate and demonstrate the total requirement which must be provided (with a 'total' box at the end), and thus the required space allocated and planned for from the start of the planning process.

Some account would need to be taken of the new requirement for "flexibility ... for a multi-purpose site", but this ought not to be an insurmountable problem.

With regards to the pro-forma, the Council's Proof of Evidence (October 2005) states that:

Enforcement procedures and processes are not a matter for the Local Plan as the legislative framework sets these out.

However, it seems to us that this is then directly contradicted in the same paragraph, which seems directly concerned with matters of process:

Policy 8/6 states that planning applications must include full details of the proposed cycle parking and the supporting paragraph outlines what these details should include.

The current application form for planning permission does include a form:

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Existing and Proposed Parking

	<i>Existing</i>	<i>Lost</i>	<i>New</i>	<i>Final</i>
<i>Total car parking spaces</i>				
<i>Disabled parking spaces</i>				
<i>Cycle and motorcycle spaces and shelters</i>				

Please show details of car and cycle parking spaces on your plan.

This is the standard application form used by anyone applying for Planning Permission. The form is a national one but we understand from a Planning Officer that it can be adjusted to make it more suitable for local use.

We believe it is currently unsatisfactory and so propose that it should be amended:

1. Mixing cycle and motorcycle provision when this is not mixed in the requirements set out in the Standards creates confusion. Cycle spaces and motorcycle spaces should be listed separately.
2. The reference to shelters should be deleted.
3. Given that the types and amount of cycle parking are required by the Cambridge Local Plan, a sentence such as the following is required:

The types of cycle stand to be used must be specified and illustrated, the numbers of each type of stand must be set out and their location(s) drawn in on the plan. A schedule showing the basis for calculation of the total number of cycle parking spaces must be included.

This schedule could be in the format we suggest above, namely: as per the Standards but with two additional columns containing the figures, plus a final total.

In questioning our view that a pro-forma is needed (despite the fact that one is already in use, as above), the following sentence in the Council's Proof, states:

The suggested pro-forma, which would require developers to indicate how much cycle parking they were providing for each category, would only be appropriate for larger developments and this information could be requested on a case-by-case basis.

It is not explained why such a pro-forma "would only be appropriate for larger developments". Would the Cheffins development, for instance, be a "larger" or a smaller development?

Neither is it convincing (nor is this justified) that requesting on a case-by-case basis is more likely to lead to a simpler system, one which is more likely to lead to compliance, due to developers being more aware of the requirements from the start.

The Bradwell's Court example above is one particularly pertinent example where the suggested pro-forma could have avoided problems from the start, as this would have indicated that cycle parking must be designed in from the beginning of the process.

Point 3. Revision of the standards downwards in places, particularly student cycle parking

We have pragmatically (but reluctantly) agreed to the proposal to revise the standards downwards in places, notably the introduction of "flexibility ... for a multi-purpose site", under the belief that this should encourage actual enforcement of the standards.

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We would rather see more “realistic” standards that are enforceable, than higher standards which are simply ignored. Our comments above about enforcement directly relate to this point.

As concerning the provision for “flexibility”, no explanatory text is provided to define what this provision will mean in practice. Such text is essential.

On student cycle parking, we feel that a reduction from one cycle parking place per bedspace (as in the 2003 Standards) to the currently proposed:

- 1 space per 2 bedspaces within Historic Core Area*
- 2 spaces per 3 bedspaces for the rest of the City.*
- 1 visitor space per 5 bedspaces*

is too great a reduction. (More detail is also needed about the survey conducted by Christ's College before it can be found worthy to apply to the general case.)

Most students in colleges such as Girton, New Hall and others outside the Core will use bikes. In the Core area, several colleges have student bikes piled outside (e.g. St Catharine's), blocking the pavements, indicating the failure of present cycle parking arrangements.

Also the inclusion of cycle parking “on merit” for some uses is unnecessary vague and no justification for this has been given.

Point 4. That cycle parking should be closer than any car parking to the entrance of a development

We feel this is an entirely appropriate and necessary policy, followed in practice by a number of developments historically, to promote cycling above the use of the private car. We feel this is entirely in line with promotion of sustainable transport and would be a simple matter to include in the Standards.

The Council responded to this suggestion (made in our submission of December 2004) as follows:

‘we do not feel it is practical to include the wording ‘where car parking is provided, cycle parking should be closer than all car parking except for disabled/family parking’

This provides no adequate basis for rejecting our suggestion. We can see no practical reasons why this could not be part of the Standards.

Point 5. Commuted payments

Whilst the Campaign has concerns about the use of commuted payments, due to the lack of clarity involved, we are concerned that developers in the City Centre are demonstrably being ‘let off’ provision of cycle parking in cases where there is supposedly no space. This is despite the City Centre being the area where cycle parking is most needed.

The Council instead propose to downgrade the standards, by introducing the (undefined) “flexibility”:

Some flexibility will be applied ... for the Historic Core Area of the City where land constraints may make application of the standards difficult for change of use or refurbishment.

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Effectively this amounts to refusal to pursue the possibility of obtaining Section 106 monies from developers to provide cycle parking off site. However, the use of Section 106 monies for off-site parking would need very careful definition before the Campaign could support it.

Point 6. Use of “should” in mandatory standards

We feel the liberal use of the term “should”, rather than “must”, is unacceptable in what are mandatory standards.

We move that the Council be asked to avoid the word “should” which indicates undue flexibility.

Point 7. Inclusion of high-capacity stands

As stated in our original submission, we feel there are only very limited cases in which these should be used. Such stands are useful in situations where there is genuinely little space. However, it is our considered view that standard ‘Rounded A’ or ‘Sheffield Stands’ are preferable where there is space, a view demonstrated by their widespread use across the city and beyond.

High-capacity stands can be difficult to use for some cyclists, especially children, the elderly and those with disabilities. They are also unsuitable for some types of bicycle.

The standards do not define the conditions under which high-capacity stands could be used. The Council’s Proof merely states:

These stands are included to allow the developer some flexibility where space is at a premium, for example in the Historic Core Area.

This is not stated in the Standards themselves. What, therefore, at present would stop a large development utilising high-capacity stands throughout (at considerable cost saving to the developer but at considerable disadvantage to cyclists)?

We therefore suggest that following wording be inserted, which we feel is appropriate and is in line with historical provision, and, we believe, the Council’s actual intentions:

“It is acceptable to use high-capacity stands only when no on-site car parking is provided. The number of such stands must not exceed 50% of the total cycle parking provided.”

Given that such a case will occur only rarely, we maintain that it is not appropriate to include a diagram of such stands in the main Standards document. A diagram of such stands would be more appropriate in a “How to do Cycle Parking” –style booklet, something which (incidentally) we feel the Council should consider producing to aid developers.