

August 31, 2011

Our ref: C 11 014

Mr Tony Collins
Planning Department
Cambridge City Council
The Guildhall
Cambridge
CB1 1BY



Cambridge Cycling Campaign

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Dear Mr Collins,

Objection: 103 Mill Road (11/0710/FUL)

This letter is a formal objection to this planning application¹ concerning changes to this location on Mill Road. Our objections concern matters relating to traffic impact.

Our objections focus on the proposal for on-street deliveries on a major cycle route (Mill Road) which is already a collision blackspot. In our view the issues are similar to those raised by the proposals in 2008 for the conversion of 163-167 Mill Road (Tesco Express), which is the only application having comparable levels of deliveries, and which was rejected by the planning authority, a decision upheld on appeal by a government inspector.

Deliveries

Our principal objection is that deliveries would have to be made from a busy distributor road, a proposal explicitly disallowed in the Local Plan. The development is unable to be serviced appropriately in an area that is currently an accident blackspot.

Cambridge Local Plan² policy 8/9 (Commercial Vehicles and Servicing) clearly states:

“Development proposals will make suitable provision for any required access and parking by service and delivery vehicles.”

This is clarified in paragraph 8.21 with the requirement that:

“Service and delivery vehicles that park on the highway can cause an obstruction to other road users. Therefore any development that will require regular loading or servicing must avoid causing illegal or dangerous parking, by providing appropriate off-street facilities.”

¹ <http://idox.cambridge.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=LNGGOGDX03Q00>

² <http://www.cambridge.gov.uk/public/docs/Local%20Plan%202006.pdf>

The present planning objection clearly fails this test. We note that the applicant fails to discuss this aspect in their application, whilst discussing several other areas of lower importance.

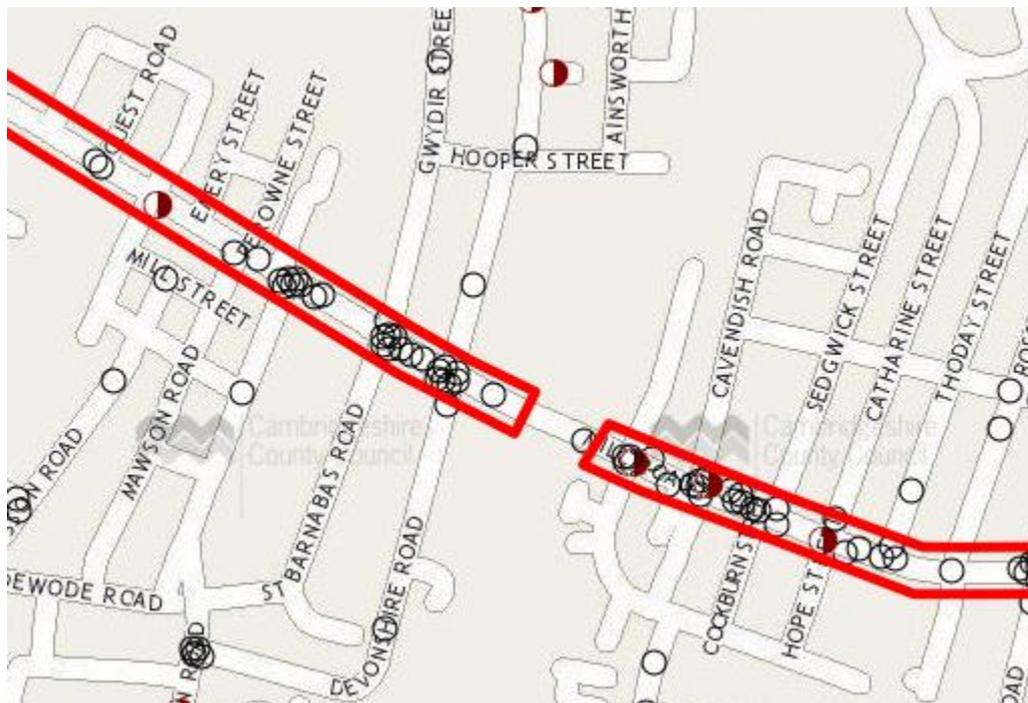
The class of business of the current occupant is such that significant deliveries are not required. By contrast, a food retailer is of a different class of business that requires very regular servicing by large vehicles on a daily basis.

Mill Road is a busy, relatively narrow shopping street and existing levels of delivery vehicles already cause congestion, inconvenience and danger. More delivery vehicles would make things even worse.

The Highway Authority starts by noting in their comments³ that:

“The proposal lies on a busy street with a poor accident history, particularly in regard to vulnerable highway user groups.”

The cluster sites map⁴ could not make this any clearer (the application area being the densest area on the left half of the map):



Indeed, this stretch of Mill Road is arguably the absolute worst for existing delivery problems. Our campaign in 2008 to press for two-way cycling on Kingston Street happened to feature this section. The photograph below demonstrates the problem caused by existing traders very clearly. It would be unacceptable to worsen the situation.

³ http://idox.cambridge.gov.uk/online-applications/files/429BB0BC6F95923E545A83339CC8F12E/11_0710_FUL-HIGHWAYS_ADVICE-633777.doc

⁴ <http://my.cambridgeshire.gov.uk/mycambridgeshire.aspx?&tab=2&StartZoom=5000&layers=Accidents&layers=Accident%20Clusters>



The applicant proposes deliveries at 7am and claims that these would take no longer than 15 minutes. We find this claim unsupported by evidence.

One of our Committee members previously worked as a supermarket delivery driver. In discussion, he stated that

“any suggestion of daily depot deliveries taking any less than 45 minutes is completely unrealistic. The driver would need to be assisted by a number of on site staff and be familiar with the site to achieve even that, and 60+ minutes is probably more likely in practice - meaning that the deliveries would still be taking place right as the morning peak period commences, even if the delivery starts on time.

“It actually takes longer to deliver to front of store, as there isn't a secure loading dock to hold the deliveries on - each cage needs to be taken into the store as it is unloaded, which takes at least twice as long.

“It seems to me that whoever came up with that 15 minute figure cannot have ever even watched a delivery, much less made one! To do it in 15 minutes would need a guaranteed vacant level unloading dock with ramp (so you don't lose time waiting to get in or using a tail-lift) and a dedicated staff to take the goods from the driver as fast as he could get them off the truck. Even then it would be tight.”

Tesco's application in 2008, which is clearly a comparable application, proposed an unloading period of up to 41 minutes a time, almost three times as long as claimed by the current application.

Based on a more likely delivery period of 41 minutes to one hour, this would clearly impact on the use of Mill Road, being nearer 8am than 7am. The Highway Authority's objection discusses the delivery period but implies that deliveries until 8.30am would be acceptable. We strongly disagree. At 8.30am deliveries in this area would cause substantial inconvenience and danger to other road users, and we think this is a good example why the Local Plan requires that new developments provide their own off-street facilities rather than impacting on the public highway.

For all these reasons, we therefore object on these grounds, that the application fails to comply with policy 8/9.

There is clear precedent that refusal of this application on highway safety grounds would be valid, as the same delivery regime issues applied to 163-167 Mill Road. The decision by the government inspector to refuse Tesco's appeal on that development was on the grounds that "both of the realistically available servicing options would pose unacceptable risks to highway safety". One of those options was indeed to deliver from Mill Road.

Cycle parking

The applicant proposes 9 sheffield stands, providing space for 18 cycles. The site is stated⁵ as having a Gross Internal Area of 383m². Retail food use requires 1 cycle space per 25m². The provision of 18 cycle spaces therefore meets this requirement. We therefore have no objection to this aspect of the planning application.

However, we note in passing that the applicant's recently-opened store in Regent Street failed to provide any cycle parking in front of the store, despite there being space directly in front (and despite this being an area of known cycle parking need). As a result, cycles are now being left insecurely nearby. The adjacent fencing at that location is marked with 'No cycles' signs. Oddly, we note that the planning application⁶ (dealt with under delegated powers) for that development failed to consider cycle parking at all.

Accordingly, we ask that the present application is properly scrutinised to ensure that cycle parking provision is compliant and properly implemented if the development is approved.

ATM: likelihood of illegal stopping

We object to this application on the grounds that this will very likely create an increased number of motorists stopping on Mill Road to 'nip out' to the cash machine, in an area where cyclists are already heavily inconvenienced and endangered by vehicles stopping illegally or inconsiderately. This can already be observed with other cash machines in the area.

We note that the Highway Authority shares these concerns and objects on these grounds⁷.

We note that the applicant has confirmed in subsequent correspondence⁸ that the external ATM will be withdrawn, in response to concerns by the Highway Authority. We withdraw our objection on the ATM aspect if the plans no longer feature the ATM.

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Martin Lucas-Smith
Co-ordinator

⁵ http://idox.cambridge.gov.uk/online-applications/files/4FEC7D88C27B69E1E5CEC4D6C3C98629/pdf/11_0710_FUL-AGENT-645525.pdf

⁶ http://idox.cambridge.gov.uk/online-applications/files/14348418A021B0D2DCE5E34408D5AE71/pdf/11_0027_FUL-DELEGATED_REPORT-606335.pdf

⁷ http://idox.cambridge.gov.uk/online-applications/files/429BB0BC6F95923E545A83339CC8F12E/11_0710_FUL-HIGHWAYS_ADVICE-633777.doc

⁸ http://idox.cambridge.gov.uk/online-applications/files/4FEC7D88C27B69E1E5CEC4D6C3C98629/pdf/11_0710_FUL-AGENT-645525.pdf