

October 24, 2011

Our ref: C 11 024

Councillors of the East Area Committee



Cambridge Cycling Campaign

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Dear Councillor,

Sainsbury's Mill Road 11/0710/FUL

By way of introduction, Cambridge Cycling Campaign is a non-partisan, local voluntary organisation with 1,000+ fee-paying members. We work with local government and others to improve cycling conditions. Amongst other activities, we monitor planning applications to check for proposals will harm prospects for increasing levels of cycling.

We write to urge you to reject the above application at your meeting on Tuesday 25th October, on the grounds of transport arrangements that do not comply with the requirements of the Local Plan. (For the avoidance of doubt, we have no view on the non-transport –related matters that other objectors may be raising.)

The applicant has proposed delivery arrangements that are not in compliance with the Local Plan policy 8/9 as clarified in paragraph 8.21. It is clear from the correspondence between the applicant and the Highway Authority that the applicant has become more and more desperate to reach approval of an obviously unsatisfactory delivery arrangement, and the final proposal involves theft of public space for a delivery bay that in practice would not actually fit.

Timeline of the proposals

The applicant initially proposed delivery from on Mill Road, to which we strongly objected. This would be the same arrangement as rejected by the Planning Inspectorate for the recent Tesco application. The applicant then proposed a half-width bay. This would leave cyclists at risk and would require taking of the pavement. This too was rightly rejected by the Highway Authority. The applicant then put forward an eleventh-hour proposal for a 'full-width' delivery bay at the expense of the public pavement.

We append a summary of these proposals so that Councillors are clear what is proposed.

Also, we have reviewed the documents supplied by the applicant. We find them to be full of vague claims and flawed arguments. We list these in the appendix.

Issue 1: Lorries simply will not fit in the allocated space

The applicant has proposed a loading bay that simply will not fit an 11m lorry.

Incredibly, the Highway Authority seems not to have verified the suitability of this bay.

A member of our Committee, Jim Chisholm, is an expert on lorry tracking drawings. He is in fact the original author of TRACK, in 1980, software which now, in modified form, is much used to create lorry tracking diagrams to this day.

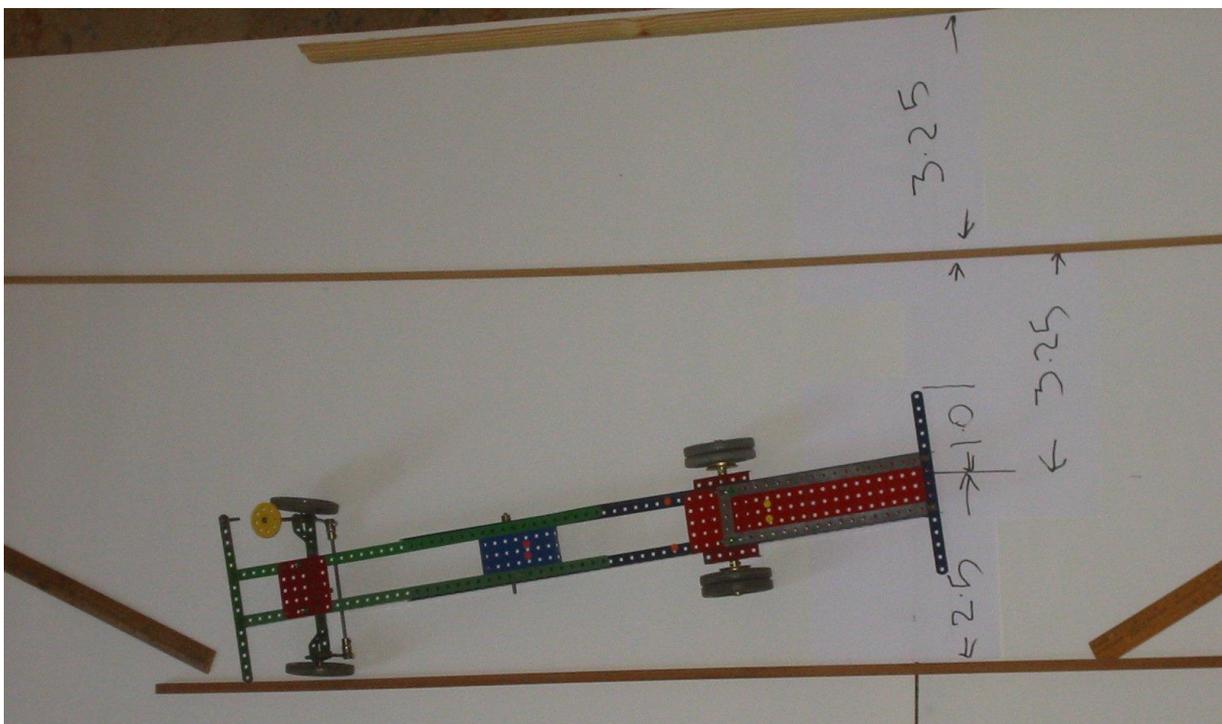
Jim has reviewed the proposals for a delivery bay. His view is as follows:

“When a large vehicle enters a bay like this, it is impossible for the rear wheels to get close to the kerb, unless it either reverses in or the front wheels mount the footway by a significant amount, the first of which is dangerous in a busy area such as this, and the second of which is illegal. A quick test suggests that as the front of the vehicle reaches the point where the bay begins to narrow at the end of the 12m section, the rear will still be sticking out over one metre into the highway. This leaves insufficient space for any car to pass in safety, unless it crosses into the lane for opposing traffic. Such an obstruction is extremely difficult for cyclists to negotiate.

The applicant’s tracking diagrams shown do not seem reasonable unless the vehicle has rear steering, which no such vehicles have. The diagram of the vehicle shown does not look to be that of a typical delivery vehicle, as it shows the axle the same distance from the front and the rear. Normally the front axle is only about 1.5 metres from the front, with the rear axle much further in (say 3.0m). This enables a better weight distribution between the single tyred steering axle and the double tyred rear axles which are permitted to carry greater weight.

How were these diagrams produced?

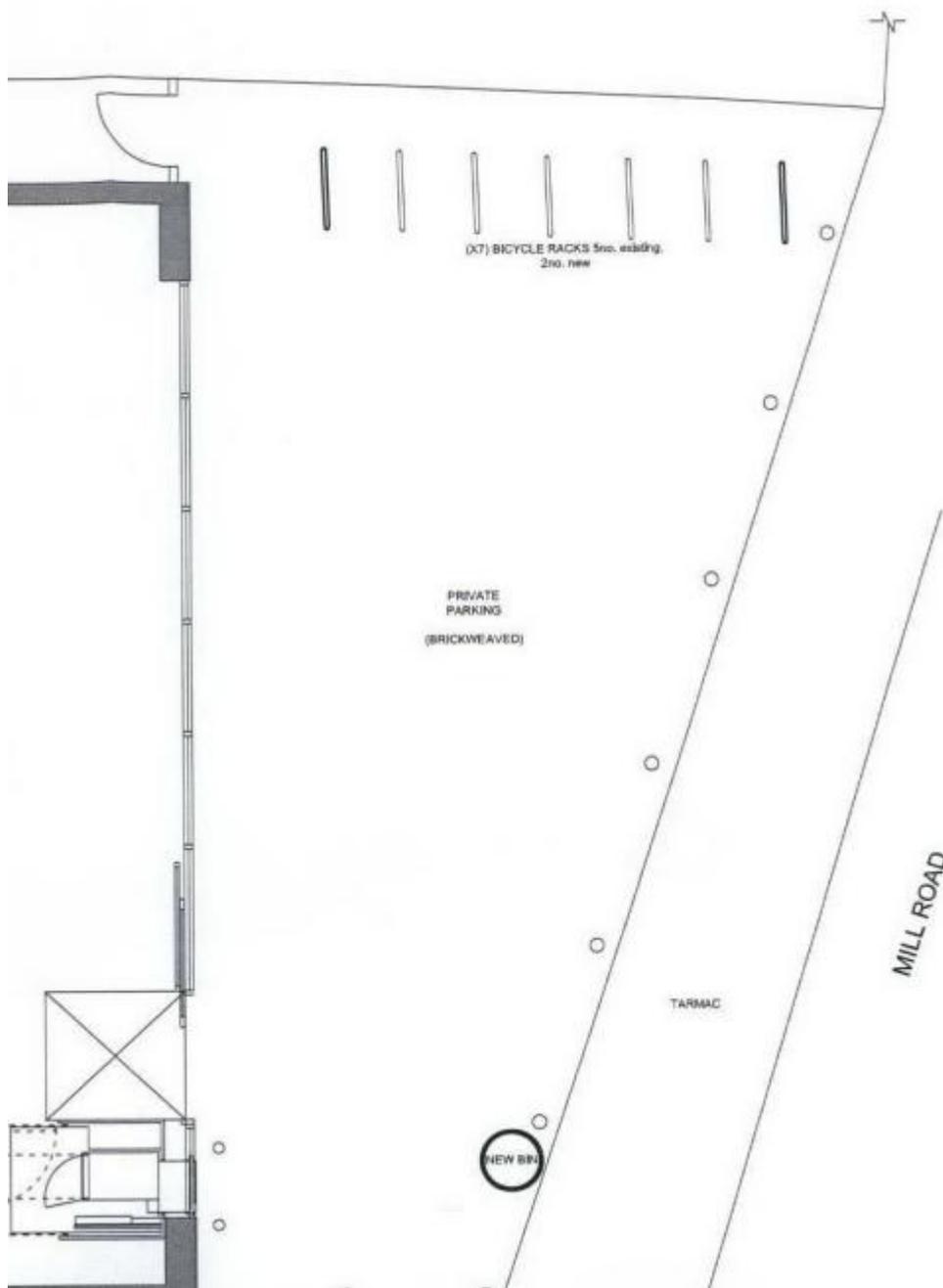
The photo shows that even taking the best line into the bay the rear is still one metre out into the road. The only way I can see to get the rear end tucked in is to have rear wheel steering. I think the photo makes it clear that unless they drive over the footway they can't get the vehicle fully into the bay. The vehicle they draw is not a typical 11m goods vehicle.”



Issue 2: Cycle parking, the tree and bins

The applicant's drawing shows that there will be additional cycle parking, plus a new bin. There is also a tree. Even if the lorry bay were at the unusable length proposed by the applicant, we do not believe there would be space to create the bay between the tree and the right end of the development. Also, it would seem that the cycle parking would not fit.

Also, the Officer report has worked out the cycle parking wrongly. $383\text{m}^2/25$ is 15.32, i.e. 16 spaces or 8 stands (not 12 spaces and 6 stands). Both the applicant's diagram and the officer's report have too few spaces.



Issue 3: Theft of the pavement

We feel it deeply inappropriate that, in an obviously desperate attempt to get approval for the application, the applicant has only managed to obtain consent of the Highway Authority by proposing removal and an unprecedented wiggle in the pavement.



The proposal is that people walking along the pavement during the delivery period will face a lorry directly in their way. We can think of no other place in Mill Road or Cambridge where a straight-line pavement has been replaced by a loading bay in the way on a narrow street. We note that the Access Officer has not been asked for views on this obviously pedestrian-unfriendly arrangement. We question whether it would meet the needs of a blind person who would unexpectedly find a lorry in their way.

Outside the delivery period, the majority of the day, they will face a 'hole' in the pavement that they will have to walk around. The Highway Authority has (rightly) made clear that it will not permit a flush pavement delivery arrangement as this would lead to increased pavement parking. Inevitably of course, a delivery bay that is unused for most of the day will result in cars stopping or parking there.

The officer report is highly contradictory. In section 8.29, where the officer discusses the initial proposal (no delivery bay), the officer states:

"The highway authority's view on front-of-site servicing without a delivery bay is that this would inevitably lead to servicing vehicles being parked on the footway, partly obscuring the footway, and partly blocking the carriageway"

The later proposal, which will block the pavement in exactly the same way, is then judged to be acceptable for some reason:

“The applicants have subsequently proposed a full-depth delivery bay on Mill Road, enabling the delivery vehicle to be drawn fully off the carriageway, and thus maintaining the full current width during deliveries. The highway authority’s advice on this is that it is a solution which would resolve their concerns about highway safety [...]”

This is against the Highway Authority’s policy of a hierarchy of provision that puts the needs of pedestrians and cyclists before motor vehicles.

The applicant has even (somewhat carelessly) included a section of the Manual For Streets 2 guidance which makes clear the problem:

MfS2, para 11.1.7: “On-street servicing bays [...] Where they are designed as lay-bys, they can be difficult to keep clear of parked cars and take space away from pedestrians”

In summary, the delivery bay will steal pavement space, to detriment of pedestrian interests, and effectively create car stopping space instead which will endanger cyclists.

We wish to record our dismay that the County Council should be consenting to an obviously pedestrian-unfriendly proposal.

Non-compliance with the Local Plan

Cambridge Local Plan¹ 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.”

We would contend that provision of a bay which will not actually fit a lorry and theft of pavement space, does not constitute “appropriate off-street facilities” or “suitable provision”. The proposal is therefore not compliant with policy 8/9 and should be refused.

In conclusion

The East Area Committee should reject the application. We cannot see any way in which an intensive delivery regime of the nature required by this kind of development is compatible with the present site

We suggest that the applicant has failed to perform due diligence on the appropriateness of the site. It is not the role of the Councils to reallocate public space, from an already poor pedestrian environment to a lorry delivery bay, in this most heinous manner.

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Martin Lucas-Smith,
Co-ordinator

¹ <http://www.cambridge.gov.uk/public/docs/Local%20Plan%202006.pdf>