

# 17/0006/03: Holland Park Phase 3, Old Rydon Lane - Member Briefing

Exeter Cycling Campaign notes the applicant's briefing to members and maintains its objection to the proposed development on the grounds that it does not constitute sustainable development, particularly in terms of Paragraph 7 and Chapter 4 of the NPPF. The basis of our objection is:

- A significant negative impact on road safety along Old Rydon Lane;
- A lack of deliverable pedestrian and cycle connections to Admiral Way;
- Poor quality pedestrian and cycle infrastructure through the site on what should be a strategic route; and
- Very low housing density that does not make most efficient use of scarce land resources.

These are explained in detail below, followed by images to illustrate the dangers faced along Old Rydon Lane without more substantial mitigation along its full length.

#### Significant Negative Effect on Road Safety on Old Rydon Lane

Old Rydon Lane is a narrow country lane, with no pavements, cycleways and very poor street lighting. There are numerous blind bends and pinch points. Hedgerows and vegetation growing out from the sides of the lane encroach on the highway, further reducing the usable width of the lane. Driveways from older existing homes exit onto the Lane with almost zero visibility. Put simply, the Lane is not a safe highway as it stands. Traffic using the Lane has noticeably increased as the Newcourt urban extension has been built out, including homes in Holland Park Phase 1 and 2. This is despite the Newcourt Masterplan setting out very clearly that the Lane was to be made more attractive to cyclists, and that additional vehicle traffic was to be discouraged. The proposed development will undeniably increase traffic further on the Lane, in conflict with the aims of the Masterplan. Exeter Golf and Country Club (EGCC) have proposed in their briefing to members to install a cycle lane along the stretch between Holland Park Phase 1 and Holland Park Phase 2. However, no details have been given as to what form this will take. Furthermore, the introduction of a dedicated cycle lane here will serve little purpose if it is not two-way and does not extend the full length of Old Rydon Lane, from the junctions with Newcourt Way to the east and Rydon Lane to the west. A route is only as safe as it's weakest point. A cycle lane that starts and ends halfway along Old Rydon Lane will likely make the current situation more dangerous. Cars turning right from Newcourt Drive onto Old Rydon Lane will not be expecting cyclists to be approaching from the direction of Newcourt Way to the east, risking collisions. It is a statistical fact that most collisions occur at junctions. Furthermore, cyclists using the short stretch of dedicated lane will quickly be disgorged onto the open road again. This lack of continuity could be confusing for both cyclists and drivers, again risking a collision. If vehicle access has to be via Old Rydon Lane, EGCC and the applicant should be required to fund and deliver either a two-way cycleway or a series of traffic calming measures along the full length of Old Rydon Lane, to ensure it retains the character of a quiet Lane where pedestrians and cyclists are given priority over vehicles. This could be achieved through a combination of measures, such as:

- Imposition of a 20mph speed limit, in line with other quiet routes and residential streets across the city;
- Road narrowings and 'Give Way' chicanes with cycle bypasses at regular intervals, forcing vehicles to respect the 20mph limit while allowing pedestrians and cyclists to pass unimpeded in both directions;

- Distinct road surfacing and markings at appropriate locations; and/or
- Making Old Rydon Lane one-way for cars along its full length, with associated 20mph speed limit, traffic calming and cycle contraflow to allow cyclists to travel westbound from Newcourt Way to Rydon Lane.

# Lack of Deliverable Connections to Admiral Way

EGCC have stated that pedestrian and cycle connections to Admiral Way will be provided. However, these connections are clearly undeliverable due to the same landowner dispute that has prevented them creating a vehicle access onto Admiral Way. This is even acknowledged by EGCC in their briefing to members (third paragraph from the end), and noted by Persimmon in their objection. EGCC have stated that it will be for Devon County Council to complete these paths at their discretion through a Compulsory Purchase Order (CPO). As a point of principle, it is inconceivable that a developer or landowner can expect connections required to serve their development to be financed and delivered by public authorities at taxpayers expense. And on a practical level, this means the development could be built without these key pedestrian and cycle connections being delivered. The squeeze on public finances is well documented, and there is nothing to guarantee that DCC will be able to deliver these connections in a timely manner. The effect of this would be to create a development that has no connection to Admiral Way, the main Newcourt spine road from which bus stops, Newcourt Railway Station, Newcourt Community Centre and other facilities are accessed. The only accesses for pedestrians and cyclists would be via the vehicle exits onto Old Rydon Lane. We have set out above the reasons why Old Rydon Lane is unsafe due to lack of pavements, cycleways and street lighting, and these proposals will undeniably make the situation worse. Paragraph 32 of the NPPF is clear that decision makers must take account of whether opportunities for sustainable travel have been taken up, and whether "safe and suitable access to the site can be achieved for all people". This is evidently not the case with the proposed development. It would therefore constitute unsustainable development.

### Poor Quality Pedestrian and Cycle Route Through The Site

EGCC state that the proposed development will deliver part of the E9 strategic cycle route through the site, linking Admiral Way and Old Rydon Lane. However, this claim is misleading on two counts. First, the proposed pedestrian and cycle access to Admiral Way is not guaranteed to be delivered, as explained above. The path through the site would therefore run from halfway up Old Rydon Lane to a dead end at the southern boundary of the site. A path from nowhere, to nowhere.

Second, the path proposed is a 2.5 metre wide path to be shared with pedestrians. There are two issues with this. First, the Department for Transport's Local Transport Note 1/2 Shared Use Routes for Pedestrians and Cyclists (September 2012) states that the minimum effective (i.e. usable) width of shared use paths is 3 metres wide. The difference between this and what is proposed may sound small, but it makes a big difference to people walking and cycling, allowing just enough space for people to safely pass each other on lightly trafficked routes. It also better caters for disabled cyclists using adapted cycles and families using trailer bikes. The cost difference between installing a 2.5m and a 3m wide path is minimal. While we acknowledge the streets within this particular development are likely to be relatively quiet and safe for most people to cycle, we do not understand why 2.5m is still being tolerated when it does not meet minimum standards.

Furthermore, a shared use path cannot credibly be described as 'strategic', a word that denotes a piece infrastructure at the top of the hierarchy with an important role to play in facilitating, accommodating and encouraging growth e.g. the Strategic Road Network. As outlined above, a 2.5m path does not even meet minimum standards for lightly trafficked local routes, let alone facilitate a modal shift away from cars and cater for larger numbers of people cycling to work and school on a daily basis. Exeter already has double the national average of people cycling to work, and an an even greater proportion walking to work (Census 2011). Both figures continue to rise on an annual basis, and the DfT's 'Propensity to Cycle' tool notes that the area of the proposed development could feasibly achieve 15 - 20% of journeys by bike on the

'Go Dutch' modelling scenario. Entrenching and exacerbating conflicts between people walking and cycling will not achieve this. It is regrettable that the word 'strategic' is being used to describe infrastructure that falls well short of what is required and expected.

#### Other

Exeter Cycling Campaign notes the 5 year housing land supply shortfall in the city and is not against development per se on this site. We would support a well-designed scheme that makes more efficient use of land, provides safe access and is better able to support local public transport services. The argument that this development will help Exeter's housing land supply is short-sighted, as it proposes development of just 22 dwellings per hectare. This is 30 dwellings per hectare less than the site was deemed capable of accommodating under the Newcourt Masterplan (50 dph). This shortfall will have to be made up on land elsewhere in the city, where it is often more difficult to achieve good sustainable transport connections. Notwithstanding this, we believe the road safety and accessibility issues we have set out above are material considerations with long term consequences, and that the NPPF's presumption in favour of sustainable development should not apply to the proposed development.

# **Images**



Figure 1: Existing shared pedestrian and cycle path abruptly ends at the entrance to Newcourt Drive. Cars have priority. Drivers exiting from this junction are not expecting other road users to be travelling against the flow of traffic and risk pulling out into the paths of oncoming cyclists and pedestrians. The risk of collisions increases with more cars using this junction, as is proposed.



Figure 2: Old Rydon Lane looking west, between Newcourt Drive/ exit from Holland Park Phase 2 and the entrance to Holland Park Phase 1. The narrowness of the road is evident. Larger vans, HGVs, refuses trucks, emergency service vehicles and lorries associated with St Bridgets Nurseries take up the majority of the road space. There is no refuge for pedestrians or cyclists, and very poor street lighting to aid visibility at night or in winter months. A one way cycle lane along this stretch will not address these issues, as larger vehicles will have no choice but to encroach onto the lane.



Figure 3: The entrance/exit to Holland Park Phase and proposed to be an entrance exit to Holland Park Phase 3. The one way cycle lane proposed from the junction with Newcourt Drive will end here. The same issues of narrowness and poor lighting remain, with even less protection for cyclists. Most vehicle traffic will also be turning right from Old Rydon Lane into the development, across the path of cyclists.



Figure 4: Old Rydon Lane looking west in the vicinity of St Bridget's Nurseries. It is not proposed that there will be any restrictions on vehicle traffic on this stretch of the Lane. There will also be no provision for pedestrians or cyclists. The Lane is used by children walking to and from school, along with commuters travelling to and from work. The increase in two-way traffic on this stretch of the Lane will increase dangers for both. A 20mph speed limit enforced through traffic calming measures such as chicanes with pedestrian/cycle bypasses in both directions is therefore essential as a bare minimum to maintain safety along the full length of the Lane.



Figure 5: Older existing homes have very poor/zero visibility when exiting driveways onto Old Rydon Lane, having to exit onto the Lane to gain any visibility. This already poses a danger to pedestrians and cyclists when travelling at the edge of the carriageway. Increased traffic along the line will increase this danger by forcing pedestrians and cyclists further to the edge of the carriageway and into the path of cars exiting driveways. The sign in the right of the image also confirms that cars with resident parking permits are legally allowed to park along the Lane, further reducing the already dangerously narrow width.



Figure 6: A completely blind bend on Old Rydon Lane looking eastbound, just after the junction with Rydon Lane to the west. It is proposed that this section of road will be open to vehicle traffic in both directions.