

## **17/0440/02: Phase Two, Land to north, west & south of Met Office, off Hill Barton Road, Exeter. Reserved matters application for construction of 115 dwellings and associated works (Phase 2 development area)**

12th April 2017

Dear Michael

We note this is a reserved matters (RM) application for phase 2 of the Hill Barton outline consent 12/0472/01. All comments are made with reference to submitted documents, notably drawing 2101 Rev P01 (Section 38 drawing) and the Development Framework Plan. We have not made direct reference to local planning policy, SPDs and the NPPF as you are no doubt aware of these.

The proposals do not accord with the design and mitigation measures set out in Chapter 11 of the Environmental Statement (ES) and the accompanying Transport Assessment (TA) and Travel Plans that accompanied the outline application. As part justification for the 11% reduction of vehicular trips outlined in section 5 of the TA, the ES would have factored in these design and mitigation measures. The TA and Travel Plan which set out these measures have been resubmitted with this RM application, presumably to discharge condition 24 of the outline consent (requirement for Travel Plan). There are therefore a number of direct contradictions between submitted documents.

The absence of measures identified in the TA and Travel Plan may or may not affect the overall conclusions on significance of environmental effects, and we trust Exeter City Council (ECC) will consider this, noting options available under Regulation 8 (clauses 2 and 3) of the Environmental Impact Assessment (EIA) Regulations. We have set out below where measures in the TA and Travel Plan have not been incorporated, and where revisions should be made in the interest of sustainable development:

- Section 5.3.3 of the TA and Section 4.2.6 of the Travel Plan states *“How cycle parking should be provided in new developments is detailed in the Exeter City Council Residential Design Guide Cycle parking. Cycle parking on the development site will be designed in accordance with this document. Garages and car ports will be large enough to accommodate bicycles and where houses are reliant on on-street parking, cycle parking will be provided in purpose built covered areas within rear gardens. Visitor cycle parking will be provided in well-overlooked areas with the use of Sheffield stands or similar”*. To take these points in the order they are listed:
  1. The only cycle parking illustrated on the submitted plans is two areas to serve apartment blocks 1 and 2. This provision does not meet the terms of the Exeter Residential Design Guide (RDG), which states that the first choice for cycle parking should be within apartment buildings themselves. Where this is not possible and cycle parking is located elsewhere, the provision should be convenient to use and safe. The covered parking areas are both located at some distance to the apartment block entrances and are boxed in via fencing, the bin store and perimeter hedgerows. They are therefore completely devoid of overlooking/natural surveillance and will be neither convenient nor pleasant to use for many from a personal safety perspective. Perceptions of crime and personal safety are as important as actual crime in determining people's behaviour – in this case their propensity to use the cycle stores.

2. Not including the apartments referred to above, the majority of dwellings do not have garages or carports and are reliant on some form of 'on-street' parking, either through parallel parking bays, parking courts or right-angled parking spaces accessed directly from the carriageway via crossing the footway. There is no evidence in the RM documents submitted that purpose built covered areas for cycle parking have been provided in rear gardens of dwellings as stated in the TA and Travel Plan. Where rear garden cycle storage is provided, direct access to the street from gardens should also be provided if there is no alternative access around the side of dwellings (e.g. terraced dwellings). As an alternative to storage in rear gardens, purpose built storage could be incorporated into the front curtilage of dwellings, provided this is secure, covered and designed in a way to contribute to/fit into the townscape. The principle of dedicated, RDG-compliant cycle storage for every dwelling is the key deliverable that we would expect to see to accord with the TA and Travel Plan.
  3. There is no evidence in the submitted drawings of the TA and Travel Plans's well-overlooked visitor cycle parking.
- Section 5.3.4 of the TA and section 4.2.7 of the Travel Plan states that "*Consideration will also be made as to whether cycle parking areas could house charging points for electric scooters and buggies in the future*". Notwithstanding the general lack of cycle parking areas, provision of charging points could also be of use to e-Bikes, which have become more readily available since the TA was prepared in 2012, and their inclusion should be considered, particularly for apartment blocks 1 and 2.
  - Section 4.2.4 of the Travel Plan states that tertiary streets will be designed using HomeZone principles. Section 3 (Connectivity & Character) of the submitted Development Framework Plan also refers to "*shared surfaces to restrict vehicle speed and give a sense of priority to pedestrians and cyclists*" on secondary streets and to "*characterise key areas*" on tertiary streets. However, this is not reflected in the submitted drawings. Standard bituminous surfacing is proposed to delineate both vehicle carriageway and footways, which are generally separated by a kerb, contrary to Home Zone principles. There is nothing to prioritise pedestrian and cycle movements at junctions (notably where roads 1 and 2 and 1 and 4 intersect), and the streetscape is dominated by vehicle parking, both in terms of right angled spaces in front of dwellings and unintended opportunities for incidental parking that obstruct the carriageway. The RDG is clear that right angled vehicular parking will not normally be acceptable unless a Home Zone approach is implemented. Figures 1 and 2 on the following pages show a comparative example from streets within Phase 1 of Hill Barton, and streets within the Abode development (Cambridge) and recently constructed Millstream development on the site of the former St Loyes College, off Topsham Road (12/0982/02). While every scheme is different and there are numerous ways of achieving a Home Zone and/or prioritising sustainable modes, we suggest that an approach closer to Figure 2 is required to match the intentions of the Travel Plan and RDG and achieve sustainable development.
  - No dropped kerbs are identified to allow cycle and mobility scooter movements to/from traffic free routes (e.g. from road 2 to phase 1, and road 1 to the existing ped/cycle route to south of the Met Office). If the kerbed approach to street design remains, these will be essential as a bare minimum.
  - Conditions 28, 29 and 30 of the outline consent require provision of details of pedestrian and cycle networks, on site bus routes and cycle parking respectively with the submission of each RM application. The applicant does not appear to have submitted any such documents with the RM submission.



Google, 2017.



Google, 2017.

Figure 1, Hill Barton Phase One. Streets dominated by right angled vehicle parking at the front of dwellings. Standard bituminous surfacing and kerblines reinforces perceptions of priority for vehicles on carriageway and pedestrian/cycle movements at the edge. Unplanned parallel parking across the kerb further obstructs the desire line, degrades legibility of the street for pedestrians and reinforces the sense of vehicle priority.



Figure 2a: Abode, Cambridge. Clear priority to pedestrians and cyclists on tertiary streets achieved through narrow carriageway width, use of non-bituminous surfacing and avoidance of kerbs. Car parking is parallel and discrete.



Figure 2b, Millstream, off Topsham Road, Exeter. Pedestrians and cyclists are given equal priority. Vehicle speeds are low due to the lack of defined boundaries. Car parking is perpendicular and delineated through subtle changes in surface colour and through the location of drainage channels and planted areas.

It is worth noting that phase 1 of Hill Barton - of which construction is not yet fully complete - suffers from the same issues in terms of lack of conformity with the ES TA and Travel Plan. We trust you will take the above comments into account in discussions with the applicant and in making your eventual recommendation to committee. Exeter Cycling Campaign would be happy to discuss any of the above further if this would be useful.

Kind regards,

Spencer Powell

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for and on behalf of:

**EXETER CYCLING CAMPAIGN**

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