



## **19/1047/FUL | 7 no. new build dwellings, associated landscaping, amenity and vehicular access. | Land Off St Leonards Road Exeter EX2 4ND**

1<sup>st</sup> September 2019

Dear Sir/Madam,

The Exeter Cycling Campaign would like to offer the following comments on the proposed development of the playing fields off St Leonards Road, Exeter (19/1047/FUL). The Cycling Campaign **objects** to this proposed development on several grounds, which are detailed below.

The Campaign objects to certain paragraphs in the Transport Note submitted as part of the planning application, to the overall conclusion of the Transport Note, and to the change in land use in this location. I have listed the paragraphs in the Transport Note below, and given an explanation as to our disagreement.

Paragraph 2.19 – St Leonards Road may well be labelled an ‘advisory route’ on the Devon County Council’s Cycling Map, but it is in reality a dangerous, narrow rat run of a road. The Cycling Map for Exeter published by the DCC is notorious for this sort of poor guidance. St Leonards Road is used as a short cut for people trying to get between Topsham Road and Heavitree Road, and is heavily trafficked at all times of day. On street parking makes the road narrow and dangerous for people on bikes with the risk of people opening doors and pulling out without looking. This should therefore not be used to suggest there are good cycle connections to this site.

Paragraph 2.21 – The Transport Note claims the site is well connected for people on bikes. Following on from the previous point, the site is not well connected for people wishing the access it by bike. St Leonards Road has been described above. The other road bounding the site, Topsham Road, is one of the busiest in Exeter. It is a major arterial route, with high traffic flows including heavy vehicles all day. It is totally unsuitable for use by people on bikes as it lacks any segregated cycle infrastructure. The ‘traffic free’ route shown along Topsham Road by the DCC Cycle Map is in fact a pavement which has had some shared space signs placed along it. It is not designed for shared use by bikes and pedestrians and given its location along a busy road is not suitable for such use. In any case, shared use paths are a last resort and certainly not advocated as part of a properly conceived transport strategy that promotes the use of sustainable modes.

Paragraph 2.22 – The Co-Bikes Scheme is presented here as somehow aiding the sustainable credentials of this proposed development. It does nothing of the sort. The development has nothing to do with the bike rental scheme, which does not even have a particularly convenient location near the site.

Paragraph 3.4 – This paragraph tries to claim that the scheme meets certain planning requirements, including those set out in the National Planning Policy Framework. The Campaign disagrees that the site has taken the opportunity to promote sustainable transport modes, as required by the NPPF. There is no dedicated cycle parking for each property. Given the location of the site near the city centre, the bike should be seen as a natural transport choice for people. The developer has failed to encourage the use of sustainable transport modes by not allocating any land to cycle parking. In fact, it has done the opposite, encouraging the use of private cars with the inclusion of so much parking space within the development.

Paragraph 3.17 - The Exeter City Council Sustainable Transport document requires new developments to be supported by infrastructure that makes sustainable travel modes a realistic and attractive option. This development does no such

thing. There is no cycle parking on the site, so residents are presumably expected to store bikes within properties. This is not acceptable to many people, so they will just not use bikes. Secure, covered bike storage should be provided at the front of every property to make the use of bikes as easy as possible.

Paragraph 3.18 - The Transport Note claims that the central location of the site is on its own sufficient to increase the uptake of sustainable transport choices. The Campaign contends that the developer has taken no active steps to promote the use of sustainable transport options, and therefore the development does not meet the requirements of the Exeter City Council Sustainable Transport document or the NPPF.

Conclusion - The Campaign disagrees with the assertion in the conclusion that the location of the site alone reduces the dependency on the private car. In fact, the very next statement makes a mockery of this assertion, as it claims the 'no loss of parking' as a positive thing. If the development was truly reducing the dependency on the private car, the developer would not worry about the loss of some parking. The developer must also make an effort to enable the use of sustainable modes of transport. The location alone cannot be seen to be sufficient.

Finally, separately to the specific aims of the Campaign, the Campaign objects to this development on principal as it represents a loss of public green space in the city. This has been a worrying trend recently in Exeter, and this development being granted consent will only encourage others to try the same. This loss is particularly acute when there is a Primary school across the road which could use the space for games and sports.

Kind regards,

Michael Kerr

for and on behalf of:

**EXETER CYCLING CAMPAIGN**

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