

# 21/1918/FUL Continuation of the new staff car park for RD&E and Wonford Hospital Trusts

Dear Howard Smith

Thank you for the opportunity to review the application for continuation of the car park on the site of the former Devon Orthopaedic and Exeter Mobility Centre. We reviewed the documents for this Planning Application [here](#).

We find ourselves having to **object** to this application until certain matters have been clarified and confirmed.

Our objection is based on a number of concerns:

1. Air quality assessment showing that this will show “significant impact” on nitrous dioxide levels
2. The extension of the temporary car park cut across the city, county and national policies to reduce the dominance of the car, prioritise active travel and decarbonise transport. It is not a sustainable development.
3. Lack of follow through on previous commitments given when the original planning application (20/1177/FUL) was made.

## Flawed rationale

We believe that the rationale for continuing this temporary car park is flawed. The Applicant suggests that the covid19 pandemic has reduced the willingness of people to use public transport and with the extension to pandemic measures that Omicron has brought this remains the case.

However, as the Application elsewhere acknowledges, the same pandemic measures mean that more people are working from home, releasing space in nearby car parking locations such as County Hall, University of Exeter and the adjacent Church of Latter Day saints which could and should be used for hospital parking.

We believe therefore that to argue, as the Applicant does, that the pandemic necessitates additional parking is flawed.

Furthermore, it is unclear whether this Application is merely to extend the temporary car park (and in which case, for how long) or to make it permanent. We would seek clarity on this.

## The Car Park’s contribution to increased air pollution

We would dispute the Transport Assessment (para 7.6) that a car park of 271 spaces “ will not encourage people to drive to work”. This flies in the face of logic, experience and the science of induced demand.

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Furthermore, the Air Quality review commissioned by the Applicant from Kairus Ltd concluded that *“the modelling is predicting a significant impact [of NO<sub>2</sub>s] at receptors located along East Wonford Hill”*.

In addition, it is a stretch to agree with Kairus’ conclusion that a 271 place car park will have a “negligible effect” on PM<sub>2.5</sub> and PM<sub>10</sub> concentrations. Their analysis suggests the car park alone contributes 2% of the council limit (AQAL) (which at 40microgram/m<sup>3</sup> is itself below the WHO recommendation of 15microgram/m<sup>3</sup>). We don’t believe this to be something that can be described as ‘negligible’.

### **Honouring previous commitments to enable active travel**

The Trusts’ press release at the time of the original application (20/1177/FUL) committed to *“moving towards more sustainable ways of working and achieving Exeter’s aim of being carbon neutral by 2030”*. They also committed to *“working to deliver our sustainable travel plan which includes improved cycle routes around the city and more cycle facilities on site”* and *“continuing to work with local partners for broader changes that promote sustainability and improve the wellbeing of local people and our communities”*.

We would ask for confirmation about whether these commitments have been honoured. It is our understanding that the RD&E Trust have yet to sign off their sustainable travel plan or their Green Plan (which all NHS hospitals must produce). The NHS’ *“Delivering a ‘Net Zero’ National Health Service”* (Oct’2020) commits NHS hospitals to *“include targeted interventions that encourage staff and patients to reduce vehicle use.”* It is our assessment that the Applicant has reached too readily for the old fashioned solution of ‘build more car parking’ in this instance and thereby undermined the NHS’, the Councils’ and the nation’s travel and net zero strategies.

Furthermore, we understand that the hospitals have equivocated in their support for the Dryden Lane car filter which is a vital part of the important east-west E9 cycle route.

### **Contributing to the local and national policies**

The RD&E is part of the Exeter City Futures joint-venture Community Interest Company which has signed off on the ‘Exeter City Council Net Zero by 2030’ plan. This plan commits to (i) working to get 50% of journeys by foot/bike (ii) shift away from high-carbon forms of transport and (iii) reduced dominance of cars in the city centre.

We believe the Application provides insufficient justification for creating additional car parking and as such falls short of Exeter Local Plan policies T1, T12. It also fails to meet the criteria of paragraphs 108 & 110 of the NPPF.

Our conclusion is that this Application is not a sustainable development.

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Should this application for the car park to be extended be granted then we would reiterate our previous requests that as a condition of granting this application the Applicant should commit to publicly supporting Devon County Council in:

- the development of a safe path along Barrack Road/Polsloe Road and, if necessary, provide space on the western edge of the hospital site for a safe pedestrian and cycle path. This would facilitate the planned '[Nurses Way - a key route for key workers](#)' which opens up safe cycling to/from the hospital site and the Marsh Barton railway station. This route will also facilitate safe cycle movement between the Heavitree and Wonford hospital sites (identified as a key movement corridor for NHS staff).
- the upgrading of the Church Lane entrance to the RD&E site for people who walk or cycle (which has been identified by NHS staff as a weak safety location on the site).

Yours sincerely

Mike Walton

for and on behalf of:

EXETER CYCLING CAMPAIGN

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