



## 23/0113/RES - Approval of reserved matters of appearance, landscaping, layout and scale in relation to outline permission 19/1461/OUT as amended by 22/1520/NMA for a mixed use development to provide town centre facilities. | Land North Of Honiton Road And West Of Fitzroy Road Exeter

Dear Matthew Diamond,

Exeter Cycling Campaign would like to **object** to the reserved matter application relating to a retail park on Fitzroy Road. The reasons for this objection are:

- Failure to provide sufficient cycle parking
- Poorly positioned cycle parking
- A lack of safe routes for cyclists to access and navigate the site
- Insufficient space for pedestrians

### Cycle parking - amount

The original application form, part of application 19/1461, upon which outline permission was granted, stated that the construction of the site would add 72 cycle parking spaces. This reserved matter application includes only 20 visitor cycle parking spaces.

The following outlines the bare minimum cycle parking requirements for this site as per Exeter City Council's Sustainable Transport Supplementary Planning Document, table 2 (STSPD).

User	Calculation components	Requirement	No. Required
Customer	5600 sqm food retail; net 3252 sqm sales area (supermarket)	1 per 350m <sup>2</sup> of net retail floorspace (minimum 10 spaces)	10
Customer	4639 sqm other retail	1 per 500m <sup>2</sup> of net retail floorspace (minimum 4 spaces)	10 (9.2 rounded up)
Customer	574 sqm food and drink premises (drive thru)	Same number of spaces as for staff (see below)	4 (as below)
Employee	7891 sqm retail excluding drive thru.	1 staff cycle space per 350m <sup>2</sup> of net retail floorspace (minimum 4 spaces)	23 (22.5 rounded up)
	574 sqm food and drink		4

This site is required to have at a minimum 24 public cycle spaces for customers, and 27 for staff. These minimum values should also be viewed as egregiously low for an application that states in part 6.1 of the Design, Access, Site Waste Management and Sustainability Report

(hereon DAS) that “the objective is to minimise car usage and to encourage walking, cycling and the use of public transport.” The same document simply states in point 5.8 that “Cycle storage for staff will be within the warehouse”. The inadequate cycle parking provision for customers does not align with the stated project ambition, and the provision for staff is poorly defined and includes no guarantees of facilities to support staff who cycle, such as showering facilities.

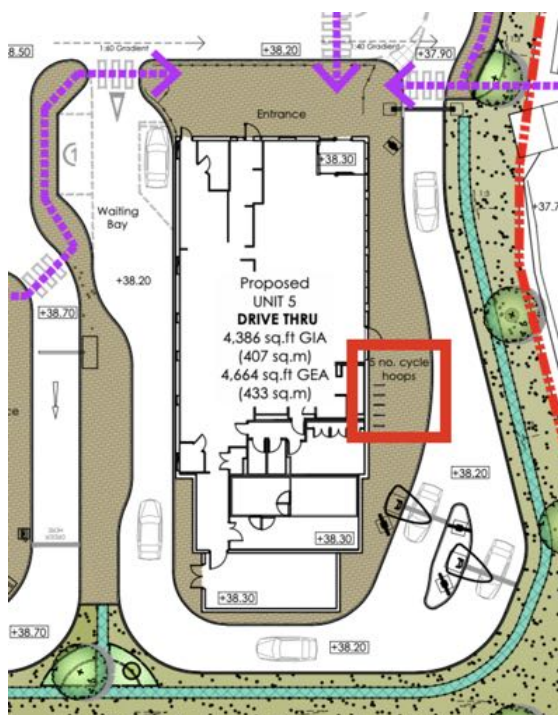
The STSPD checklist for applications (section 5.5) requires that the “Design and Access or Planning Statement, describe the quantity and nature of cycle parking, including storage system used”. I have been unable to find these details in this application and these should be provided.

### The applicant should be required to provide:

- Much more customer cycle parking, including space for adapted cycles and cargo bikes.
- Confirmation of the type(s) of storage system envisaged; ideally sheffield stands.
- Additional details on facilities for staff that will be provided to encourage and support cycle commuting. The provision of such facilities is a matter of infrastructure and should be a requirement of construction, rather than being left to future building tenants to provide.

### Cycle parking - locations

The Proposed Pedestrian Links document included in this reserved matter application suggests positions in which cycle parking might be provided. The first example shown here indicates the cycle parking is provisioned away from the main entrance to the restaurant,



accessed via a road on which drive-thru traffic will be queuing. This is not safe, nor convenient. Cycle parking should be located in a convenient and safe to access location at the front of the restaurant.

There is no cycle parking planned outside the supermarket according to the Proposed Pedestrian Links plan. This despite the supermarket being a key “town centre” facility. There are around 100 car parking spaces closer to the supermarket entrance than the nearest cycle parking space. People using these cycle spaces must cross two roads to reach the supermarket, with these crossings not provided as raised platforms.

Space needs to be provided for both bikes and cargo bikes outside the supermarket, and all



other retail units, to encourage customers to cycle rather than drive.

**The applicant should be required to:**

- Provide cycle parking in safe and convenient locations around the site next to each retail unit to align with the developer's stated ambition to "*minimise car usage and to encourage walking, cycling and the use of public transport.*" (DAS, 6.1).
- Favour facilities for those using active transport by ensuring walking and cycling is more convenient than driving and parking on the site. This can be done by moving car parking for non-disabled users further from retail units to provide more space for pedestrians and cyclists.
- Make crossings into raised platforms to make them more accessible for disabled users, pushchairs, etc. This will also act to slow traffic around the site.

**Safe cycle access**

There are no cycle routes, or shared paths identifiable on the site master plan. Cycling in car parks, where cars are manoeuvring, can feel very unsafe. This is compounded in this development by the array of junctions serving the drive-thru premises. The developer should include safe demarcated routes for cyclists to cross the site from the main entrance.

There is no access from Honiton Road for people cycling, compelling them to take an unnecessary detour along a busy route. The ramped accessway appears to be too narrow to act as a shared facility, with a tight corner that precludes use by bikes. There should be a route for cyclists to access the site directly from Honiton Road.

The developer should be surrendering space along the edge of Honiton Road to widen the pavement that runs here. This should be broadened to give pedestrians more space on what is a very busy road. Ideally this path would be broadened sufficiently to act as a shared cycle path for eventual connection to the existing shared path that runs down the A3015 from Hill Barton Road; subject to issues with the railway bridge being resolved. More space is certainly required if a bus stop is to be added here.

A pedestrian and cycle connection to Myrtlebury Way should be mandated. It is currently marked as "subject to requirement".

There is a shared use cycle path that goes across the road that is intended to act as the main entrance to this site. At present traffic volumes are relatively light along Fitzroy Road, but this application is likely to significantly increase car traffic. To avoid a worsening of the existing provision, cyclists using the shared path should be given priority across this junction, with a clearly raised platform and sufficient markings to make this priority clear.

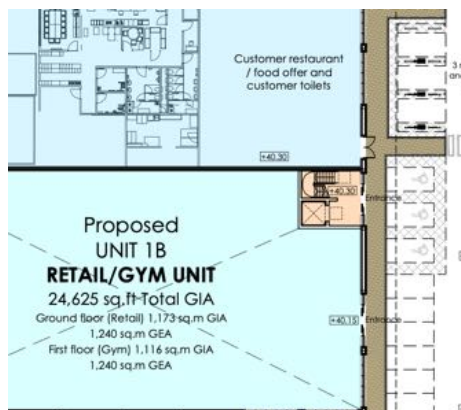
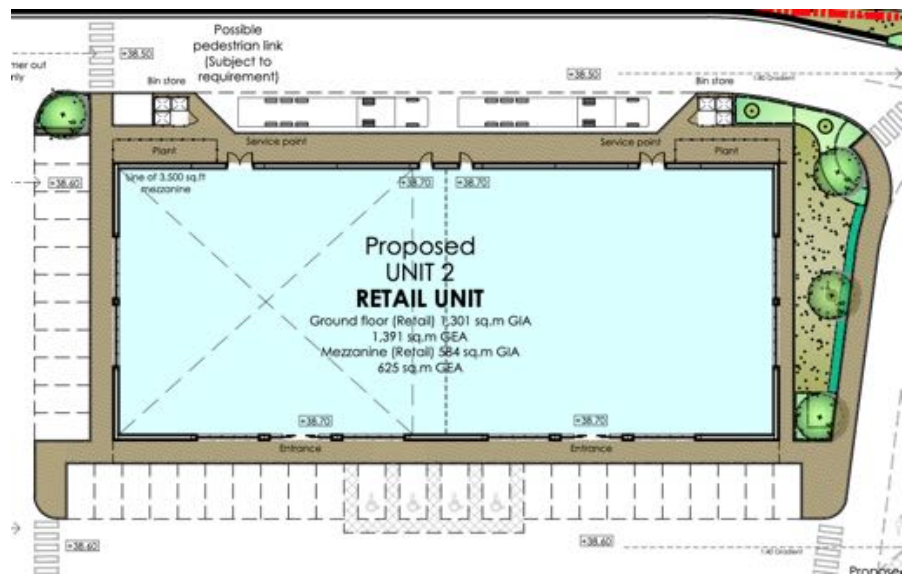
**The applicant should be required to:**

- Provide demarcated cycle routes into and across the site to improve the safety of cyclists.

- Provide a pedestrian and cycling connection into Myrtlebury Way.
- Provide a pedestrian connection to the Brewer’s Fayre site; this is marked as a pedestrian route but also indicated as covered in planting in the plans and needs clarifying.
- Provide space to widen the pavement on Honiton Road that adjoins the site.
- Provide an access route for cyclists from Honiton Road.
- Through s106 contributions, pay for the existing cycle path across the site entrance to be improved.

### Insufficient space for pedestrians

The pedestrian curtilage around the various retail units on this site as planned is insufficient. Consider retail unit 2 shown right. The pavement across the store fronts is narrower than the width of a single parking space. This forces pedestrians up against cars that are manoeuvring into parking spaces. It introduces conflict between people walking, using trolleys, or mobility scooters. Parents with children must remain extremely vigilant as there is no allowance for children running out of stores. As a brand new site that strives to provide “town centre facilities” the current plans are failing in the basic necessity of giving people space.



Another example of the parsimonious allocation of space to people walking on the site is shown left, this time outside the supermarket and retail unit 1b. The developer should be making more space available to people walking and cycling around the site.



**The applicant should be required to:**

- Increase the pedestrian curtilage around each unit so there is space for people to comfortably use the site without conflict.
- Make all other pavements on the site wider, including the ramp from Honiton Road.

**Summary**

This development is likely to lead to significantly more car journeys in an area of Exeter that is already plagued by car traffic. The inclusion of drive thru facilities will likely draw traffic from the M5 across the already congested Moor Lane Roundabout. In this context it is important to minimise locally generated traffic. This can be done by making the site as accessible and welcoming to pedestrians, cyclists, and users of public transport as is possible. The Exeter Cycling Campaign hope that the comments provided in this response can help deliver a site that works for all users.

Yours sincerely,

Ben Ayliffe

for and on behalf of:

EXETER CYCLING CAMPAIGN

---

[exetercyclingcampaign.org.uk](http://exetercyclingcampaign.org.uk) | Twitter: @ExeterCycling | Facebook: ExeterCyclingCampaign