



18/0983/OUT | Outline planning permission for a retail park (Class A1) along with complementary cafe/restaurants (Class A3) including means of access (all other matters reserved). | B And Q Avocet Road Sowton Industrial Estate Exeter Devon EX2 7JF

20th July 2018

To: Matthew.Diamond@exeter.gov.uk

Cc: Lloyd.Orriel@devon.gov.uk; Alex.Bulleid@exeter.gov.uk

Dear Matthew

Thank you for consulting Exeter Cycling Campaign on this planning application.

Exeter Cycling Campaign **object** to the proposed development for the following reasons:

- Non-compliance with the adopted Local Plan, particularly in relation to CP1, CP8, CP9 and T3;
- Negative impact on air quality in an Air Quality Management Area;
- Negative impact on the safety of vulnerable road users, contrary to paragraphs 32 and 35 of the NPPF.

The reasoning behind our reasons for objection are set out in full below.

Non Compliance with Core Strategy Policies CP1, CP8 and NPPF Paragraphs 24 - 27

Policy CP1 constitutes the spatial strategy that underpins the entire Local Plan. It states that provision for growth in the city over the period 2006 – 2026 is based on

“promoting the City Centre as the sustainable heart of the city to include...around 3,000sq metres net retail convenience floorspace, and up to 37,000 sq metres net retail comparison floorspace” (point ii);

The proposed development fundamentally conflicts with this policy.

The applicant does not appear to have submitted evidence of a sequential test as required by the NPPF and has therefore not considered impacts on the city centre, now and into the future. The bus station site is once

again available for development and any development that threatens the vitality of the city centre and its role as the heart of the city should be refused.

The retail provisions of policy CP1 are given further expression in Policy CP8. In particular, policy CP8 states that:

“Retail development outside the City Centre should be located in the district or local centres.... In all cases proposals must be accessible by public transport and other sustainable modes, and be appropriate in scale and character to the role and function of the proposed location.”

The Plan defines Local Centres as *“Small group of shops and services generally serving the immediate local area. Usually comprises a newsagent, a general grocery store, a sub-post office and, occasionally a pharmacy, a hairdresser and other small shops of a local nature.”*

The type and scale of development proposed as part of this retail park, with an emphasis on ‘warehouse style’ units for comparison goods, drive-up restaurants and extensive free car parking is not in accordance with this policy.

Poor quality access and failure to consider cycle movements in wider area

The proposed development will generate a significant amount of traffic, containing as it does a large element of comparison retail and being centred around a 485 space car park. This will inevitably attract residents from elsewhere in the city and outside.

The Design and Access Statement (DAS) makes no reference to cycle access, only referring to cycle parking.

1. The site is not well catered for in terms of cycle access. Links to/from the direction of the city centre are particularly poor, as is accessing employment and residential growth areas at Monkerton, Hill Barton and Pinhoe to the north. Crossing Honiton Road to connect to the E3 and E4 numbered routes via Ambassador Drive and Cumberland Way requires cyclists to stop, wait and cross at multiple points on Honiton Road around the multi-lane roundabout, with no direct routes on the desire line. The environment is amongst the most hostile in Exeter for people walking and cycling and ultimately people are highly likely to drive to the retail park, even for short distances, given the lack of safe and attractive cycle routes and the offer of free car parking;
2. There are only interrupted shared paths along Moor Lane and no cycle provision on Avocet Road. Avocet Rd already carries considerable numbers of cars and HGV which do not mix well with people cycling. This situation will be worsened without good provision for people cycling -separated from

those walking and those driving.

3. The applicant is not proposing a cycle route into the primary access on Avocet Drive. This would be the most direct route for many people working on employment sites along Avocet Road and Osprey Road.
4. Although the applicant proposes a pedestrian access to the north end of the site, they have not proposed a cycle route access from the shared use (cycle) path on Honiton Rd to the north, indeed the applicant does not even take note of the cycle route here.
5. The Department for Transport recommends 3m is the minimum effective (i.e. usable) width for shared paths where light use is expected. However, this area of Sowton is both a major employment hub and a major transport hub thanks to the Honiton Road Park and Ride. Flows of people into the area for work are exceptionally high¹ (extract at Figure 2) and there is huge potential to boost the number of people walking and cycling to work. In 2011, 62% of people commuted by car into the area compared to 6% by bike². However, the Government-backed 'Propensity to Cycle' tool shows that on the 'Go Dutch' scenario, the Lower Super Output Areas (LSOA) surrounding the site can achieve a modal share of between 17% and 21% of people cycling to work.³ Once the growing availability of e-Bikes is factored in, this rises to between 28% and 32%.⁴ In this context, the existing pavements and shared paths in the area are already insufficient, and development that will further increase flows into the area must provide significantly enhanced infrastructure in the form of segregated cycle routes that remove conflicts between cyclists, cars and pedestrians. As a minimum, the proposed development should be providing safe and convenient cycle access into both entrances to north and south. It should contribute to a cycle route west towards the city/housing along Honiton Rd, which lacks any meaningful provision. This would provide a genuine alternative to the car in allowing people to cycle from Heavitree and Broadfields to the shops and employment proposed at Sowton.

1

<http://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=E02004159&zoom=14&lon=-3.4604&lat=50.7208>

2 <https://www.pct.bike/m/?r=devon>

3 Ibid.

4 Ibid.



The **British Land Retail Warehouses Limited Transport Statement Part 1** states the following which we would dispute as illustrated above:

2.3.8 Although there are no dedicated cycling facilities present in the immediate vicinity of the development site, the slow traffic speeds and wide carriageway widths of Avocet Road and Osprey Road are considered suitable for on-road cycling. Moor Lane does include a shared cycle / footway on the eastern side of the carriageway which provides access to the wider Sowton Industrial Estate. This route connects with the traffic free cycle route along Honiton Road to the north and traffic free cycle routes connecting to residential areas of east Exeter to the south.

2.8.1 This chapter has reviewed the existing conditions in the vicinity of the site and it is concluded there are good opportunities for customers and staff to use sustainable modes of transport when travelling to the site. This conclusion is supported by the following:

There is an excellent network of footways and pedestrian crossing facilities present in the immediate vicinity of the site that link into the wider footway network on the eastern side of Exeter. It will therefore be easy for pedestrians to make linked trips between multiple land uses in this area i.e. within Sowton Industrial Estate, the Met Office, or Exeter Business Park, and for staff to walk to work from surrounding residential areas.

Exeter has a large cycling network with many traffic free routes across the city. The proposed site is close to a number of cycle routes that provide easy access from the City Centre and surrounding residential areas.

Non Compliance with Core Strategy Policy CP9 and Policy T3 of the Exeter Local Plan

Policy CP9 of the Core Strategy requires:

- “a step change in the quality, capacity and environmental performance of public transport,
- demand management measures;
- improvements to facilities for pedestrians and cyclists.”

Policy T3 of the Local Plan requires that development accord with the hierarchy of modes, prioritising people walking, then cycling, then using public transport and finally people driving. This is in the interests of safety and sustainability.

The proposed development fails on all these measures. It is a car-centric development that will encourage people to drive and take advantage of free car parking, increasing demand for road space by the least efficient mode of transport (private car). It will degrade facilities for pedestrians and cyclists by contributing to the already hostile environment on and around Honiton Road/Moor Lane roundabout (see above), and increasing traffic along Avocet Road. It also propose practically no improvements to facilities for pedestrians and cyclists.

Negative Impact on Air Quality

Honiton Road is within the Air Quality Management Area (AQMA) and suffers from poor air quality. The Environmental Health Officer has noted that air quality will worsen as a result of the nearby proposed retail parks. Given the close location and similar type and scale of this proposed development, the same air quality concerns are likely to apply to this proposed development. Cumulative effects could also arise if all these developments are approved and the applicants have given little consideration to this.

The effects of the extra air pollution generated by this proposed retail park will be felt by local residents, including our future generations. The shift to electric cars will take a number of years, and start from a very low base. Notwithstanding the continued congestion and road safety issues caused by cars, electric or otherwise, the eventual shift to electric by 2040 will do nothing to mitigate the years of air pollution exceedances and worsening health impacts the proposed development will contribute to.

Exeter is currently consulting on its Air Quality Action Plan for the 5 year period up to 2023. If that strategy is to stand any chance of being effective, and we are to reduce air pollution and improve health outcomes in our city, retail park development such as that proposed in this application must be refused in favour of walkable retail destinations designed around active travel networks and high quality public transport.

Negative Impact on Road Safety and relevance of NPPF Paragraphs 32 and 35

The Devon Collision Map, providing data up to December 2016, shows multiple collisions on and in the vicinity of Honiton Road/Moor Lane roundabout (Figure 1). This therefore make the roundabout a collision cluster spot and demonstrates that it is not safe. By definition, the roundabout and approaches will be particularly unsafe for vulnerable road users and unattractive to cycle on the road. The lack of quality, connected, segregated cycle routes in the area means that less confident cyclists or parents cycling with

children are not likely to cycle to the proposed development. This will further increase car usage, while putting vulnerable road users on Honiton Road, Moor Lane and the roundabout at greater risk.

It should also be noted that the proposed development does not give priority to pedestrians and cyclists at the main entrance to the south, nor within the development for cyclists. This will increase the likelihood of collisions both at the site entrances and within the expansive car park. In 2016, almost two thirds of collisions involving fatalities or serious injury to cyclists occurred at junctions (ROSPA Cycling Accident Factsheet 2017), and 80% of all collisions involving people cycling occur during daylight hours (i.e. during store opening hours).⁵

Considering the proposed development in light of the road safety and network issues outlined above, and the requirements of Paragraph 35 of the NPPF.

Paragraph 35 states that developments should:

- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;

The draft NPPF published for consultation strengthens language on designing, integrating and implementing sustainable transport as core principle of new development, and emphasises that this includes providing high quality connections into surrounding areas.

The proposed development very obviously does not give priority to pedestrians and cyclists, and does not create a safe and secure layout that minimises conflicts between traffic and pedestrians or cyclists. It will also have a negative impact on the safety of vulnerable users along Honiton Road, the roundabout, Moor Lane, Avocet Rd and Osprey Rd by virtue of increased traffic volumes and lack of segregated cycle infrastructure.

Section 106 in the event of permission being granted

Exeter Cycling Campaign believe that the proposed development represents a fundamentally unsustainable development typology and should be refused. However, in the event that permission is granted, it is essential that the access design is revised to prioritise pedestrian and cycle movements both into and within the development. This would require creating gently levelled access (separated from people walking) to the north

⁵ <https://www.rospa.com/road-safety/advice/pedal-cyclists/facts-figures/>

and kerb separated paths on the road network to the south; and clearly protected routes within the development to cycle parking spots in the front of each unit.

It would also be essential to secure significant financial contributions to help mitigate the road safety and air quality impacts of the proposed development, through provision of new segregated cycle infrastructure and safer junctions along the routes affected. This includes providing funding to provide safe cycle access to the west along Honiton Rd towards Heavitree.

Existing bus routes along Honiton Road are not sufficient alone to meet sustainable transport aspirations for the area, and in the absence of Monkerton train station being delivered, it is essential that contributions deliver high quality active travel infrastructure that segregates cyclists from pedestrians and vehicles and meets the latest design standards⁶.

Yours sincerely

Bridget Walton

for and on behalf of:

EXETER CYCLING CAMPAIGN

exetercyclingcampaign.org.uk

Twitter: [@ExeterCycling](https://twitter.com/ExeterCycling)

Facebook: ExeterCyclingCampaign

⁶ <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>

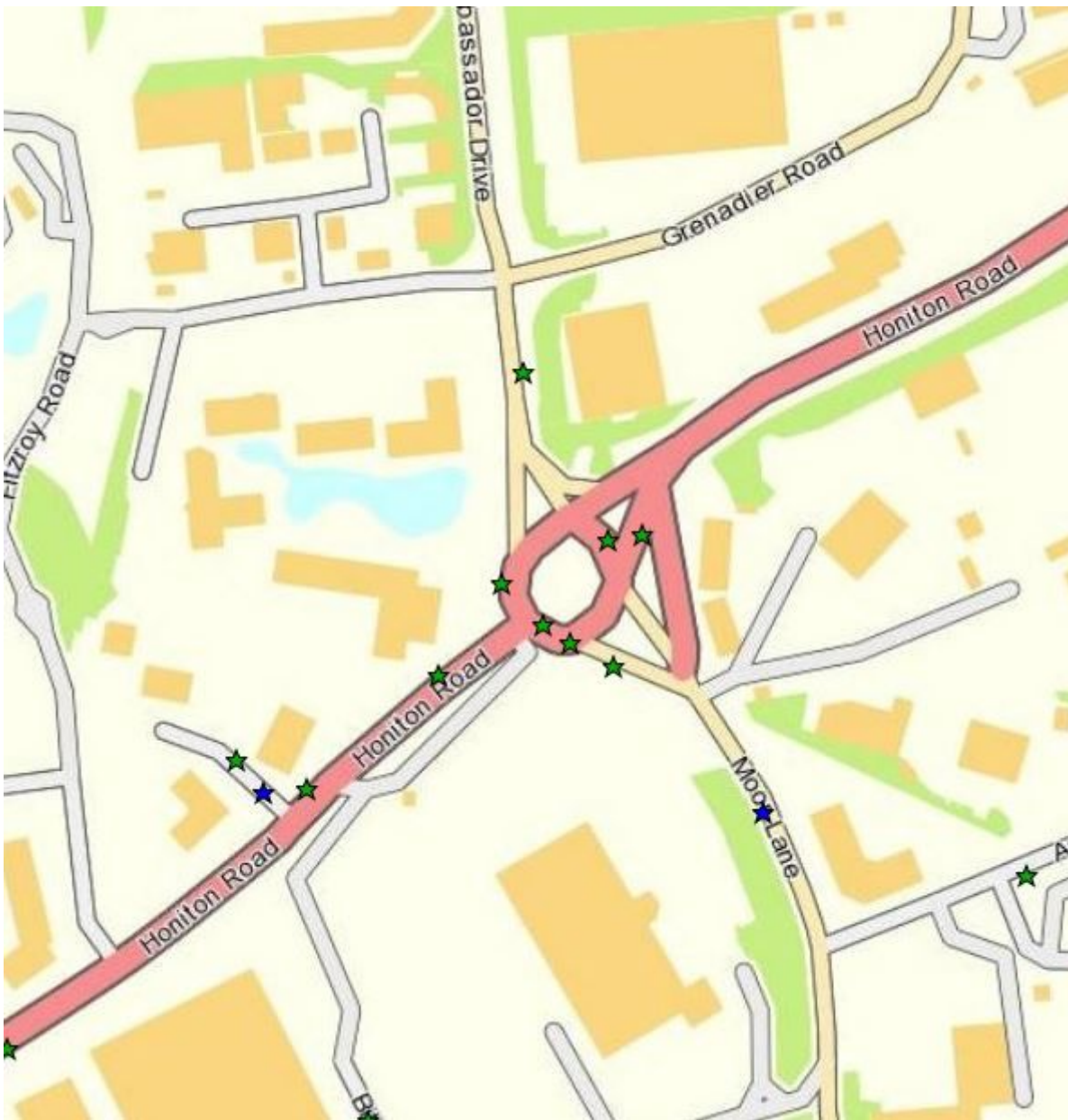


Figure 1: Devon Collision Map, showing numerous collisions along Honiton Road and on the Honiton Road/Moor Lane roundabout up to December 2016, including the main route between the proposed development, Sowton and growth areas to the north from where the majority of custom and commuting is likely to originate. Collisions are recorded along the full length of the Honiton Road corridor.

Figure 2 (below): Extract from UCL/ESRC 'Data Shine' Commute map based on 2011 census data, showing significant 'in commuting' to the Middle Super Output Area (MSOA) within which the proposed development is located. This demonstrates the importance of providing real alternatives to car commuting to the area to reduce congestion and air

pollution and boost health and wellbeing. This requires provision of fully segregated cycle routes connected into the wider network. This will allow high volumes of people to cycle safely and efficiently to and from the proposed development to access shops, services and jobs. Limited shared paths with multiple crossing points, convoluted turns and poor desire lines will not achieve modal shift and increasing car use in the area will continue.

