



18/1007/FUL | Planning application for a mixed-use development comprising Class A1 retail units; Class A1/A3/A5 food and drink units with drive through facilities and Class D2 health & fitness use on the site of the Police Headquarters, Devon And Cornwall Constabulary Police Training College, Alderson Drive, Exeter EX2 7HQ.

13th September 2018

Dear Matthew,

Thank you for consulting the Exeter Cycling Campaign on the planning application for the development of a retail park on the site of the Police HQ at Middlemoor. The Exeter Cycling Campaign object to this proposed development for the reasons set out below:

Negative Impact on Road Safety

The Devon Collision Map, providing data between January 2013 and December 2017, shows multiple collisions in the vicinity of proposed development site (Figure 1), with seven collisions close to the entrance of the site, including one that was classified as serious. This demonstrates that in its current state the existing infrastructure is not safe.

Further development will increase traffic in this area as well as Honiton Road, which is already heavily congested. Whilst some of the areas in the immediate area provide shared cycle facilities, there are many areas where the main road is the only option for cyclists and in some of these areas pedestrians also need to walk on the road to avoid having to walk extended distances. This proposal will increase the volumes of traffic, worsening roads that are already unsafe for vulnerable road users.

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 and the areas surrounding the proposed development at greater risk.

Negative Impact on Air Quality

The development site is close to an Air Quality Management Area (AQMA), declared for exceedances of the objectives for nitrogen dioxide (NO₂). The Environmental Health Officer noted that air quality would worsen as a result of the previously proposed retail park at Honiton Road/Fitzroy Road (18/0076/OUT), notably on East Wonford Hill and through the Heavitree corridor. Given the close location (0.7 miles away) 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 multiple developments of this kind are approved and the applicants have given no 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 developments 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.

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

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. 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. Local retail facilities will be required as part of the community provision at the Monkerton/Hill Barton and Newcourt urban extensions”

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 pedestrian and cycle movements in wider area

The proposed development will generate a significant amount of traffic, with a 752-space car park being proposed. The retail nature of a number of these units will inevitably attract residents from elsewhere in the city and outside. Due to the drive-through food outlets being proposed, it would be expected that high volumes of short stay motor vehicles would be visiting the proposed site, further adding to congestion within the area and therefore not prioritising cycle and pedestrian movements.

The proposal refers to *“a number of shared footways and cycleways on the highway network surrounding the site. These run along the extent of the western boundary of the site from Sidmouth Road to the south towards Honiton Road, along Hill Barton Road and also on the A3015 past Alderson Drive. These shared routes connect the site to Exeter City Centre and other key transport interchanges such as the Park & Ride site to the east of the site and Digby and Sowton railway station to the south.”*



Whilst there are some cycle links (primarily shared cycle/footpaths), 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 Honiton Road in either direction with no direct routes to the east or west without significant detours. Those wishing to access the E3 & E4 cycle routes along Ambassador Drive and Cumberland way would need to either cross the road a number of times and take an indirect route or would need to cycle along Honiton Road.

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;

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.

Yours sincerely

Alex Tait

for and on behalf of:

EXETER CYCLING CAMPAIGN

exetercyclingcampaign.org.uk

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

Facebook: ExeterCyclingCampaign

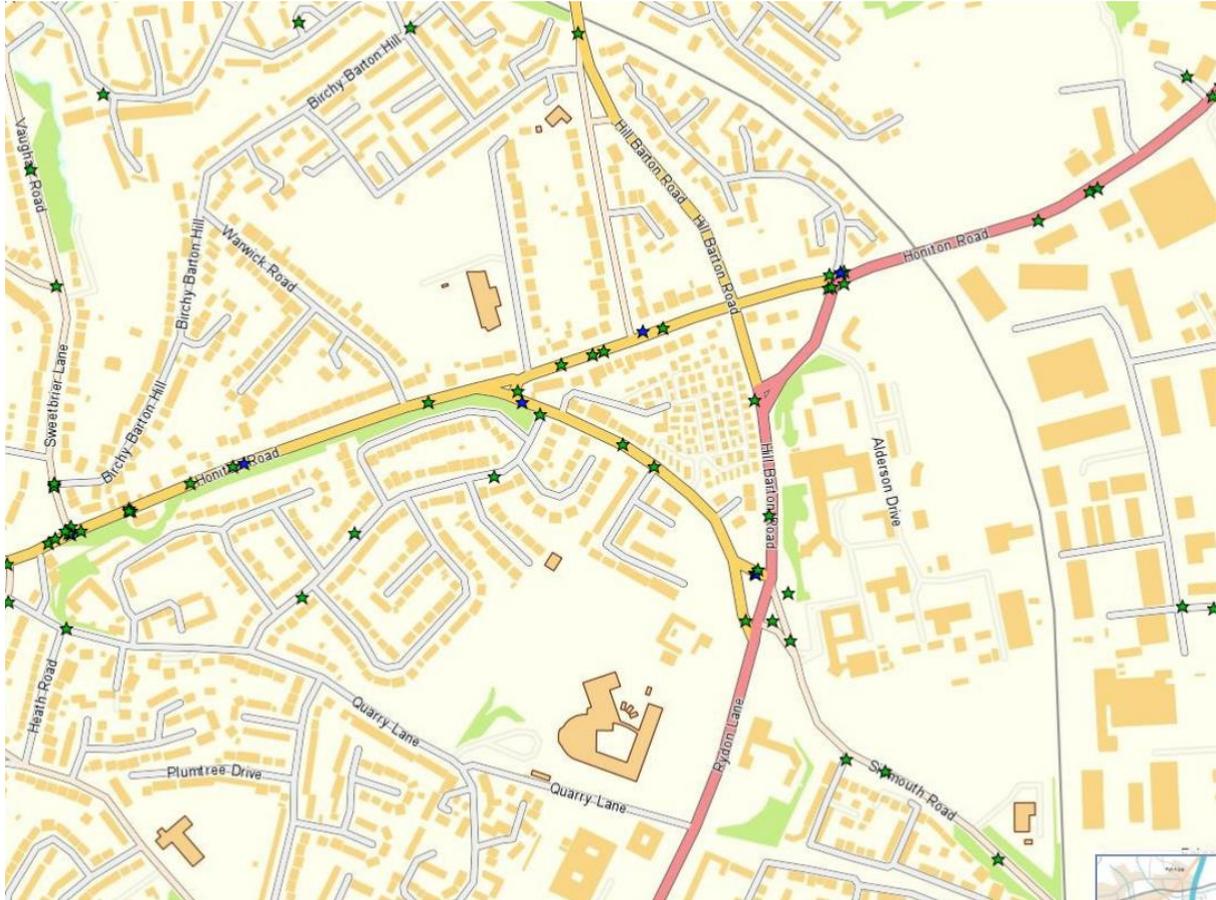


Figure 1: Devon Collision Map, showing numerous collisions along Honiton Road with high numbers of collisions in the immediate vicinity of the proposed development.