



18/0076/OUT | Outline application for mixed use development to provide town centre facilities comprising retail units (food and non-food) (Use Class A1) and restaurant units with ancillary drive-throughs (Use Class A3), together with associated access, access roads, service yards, car parking, infrastructure and landscaping (all matters reserved except access). | Land North Of Honiton Road And West Of Fitzroy Road Honiton Road Exeter EX1 3RS

29th March 2018

To: Matthew.Diamond@exeter.gov.uk

Cc: Lloyd.Orriel@devon.gov.uk;

Dear Matthew

Exeter Cycling Campaign note the applicant has provided additional material related to air quality impacts of the proposed development in the form of a letter from Ramboll dated 21/03/2018. **Table 5 of this letter from Ramboll and the subsequent assessment of effects confirms that the impact on residential properties at East Wonford Hill from Nitrogen Dioxide (NO₂) will be 'Substantial Adverse'**. The assessment is based on data from one diffusion tube attached to a property on East Wonford Hill. However, it is reasonable to assume that the dangerous levels of NO₂ at this one location and the 'Substantial Adverse' impact of the proposed development will extend along the length of East Wonford Hill and through the Heavitree corridor.

The letter states that mitigation is proposed to address this issue. A full list of the proposed mitigation in the Ramboll letter is repeated below, with comment provided on the accuracy and/or likely effectiveness of the measures identified.

It should be noted that the Ramboll letter makes no attempt to assess the effect of the mitigation they suggest on identified air quality impacts. **In the absence of evidence to the contrary, Exeter Cycling Campaign assume that even with the mitigation identified, the effect of the proposed development on air quality at East Wonford Hill and Heavitree would still be 'Substantial Adverse'**. Until and unless it can be identified that the proposed development will not negatively affect the quality of air that people in Heavitree and surrounding areas will breathe on a daily basis, **the proposed development must be refused on air quality grounds.**

Exeter Cycling Campaign also reiterate the comments in our initial submission dated February 2018 regarding the safety of vulnerable road users, negative impact on sustainability and non-compliance with the adopted Local Plan and Monkerton Masterplan. These constitute further reasons for refusal.

Comment on mitigation proposed in Ramboll letter (21/03/2018)

1. *“The principle of the scheme is to serve as a retail hub to the local community and East Exeter district. Within the Monkerton and Hill Barton Masterplan and subsequent Exeter City Council (ECC) Allocation Plans it was considered that the site is best located to achieve sustainable travel for the wider community to meet daily shopping needs. The site conveniently straddles 900 residential homes and is within a short walk for many 1000’s of employees...:”*

The Local Plan allocation was based on provision of a Local Centre to serve local needs of employees at Exeter Business Park and the new residential population of Monkerton to the north. The scale of the centre was envisaged as small scale convenience shopping, crèche, pub etc. The scale of development in the proposed development is completely disproportionate to the allocation, with a focus on large format comparison goods, drive-through fast food and larger scale food shopping. More importantly, the Local Plan allocation was based on provision of Monkerton/Hill Barton Railway Station and a high quality east-west public transport corridor. It also assumed that growth in the area would be based around minimising use of and the impact of the private car, with sustainable active travel modes like walking and cycling encouraged and facilitated through design of the built environment. These assumptions no longer apply for the following reasons:

- The railway station has not been delivered and there does not appear to be any prospect of it being delivered for the foreseeable future;
- The additional high quality east-west public transport (bus) route identified in the Monkerton Masterplan has not been delivered in the wider area, and the applicant’s small contribution (see below) is unlikely to make a significant difference to existing provision that would lead to modal shift;
- Further development at Exeter Business Park and residential parcels of Monkerton to the north has delivered a car-centric environment, where pedestrian and cycle movement is in the context of extensive on street and on plot car parking, unplanned pavement parking and roundabout access to the strategic allocation where a signalised junction was previously planned. Surrounding primary roads like Honiton Road offer zero/poor provision for cycles. The proposed development is set around a 400+ space surface car park and will further undermine the assumption of the area being developed in a manner that minimises car use.

Given the actual situation in the area with regards sustainable active travel, and in particular the poor pedestrian and cycle environment with lengthy crossing times, poor air quality and unattractive public realm, it is unlikely that all but the closest of employees will walk or cycle to shops on the proposed development. Furthermore, any slight reduction in car trips from surrounding employees will be more than offset by the

additional traffic generated from people driving from elsewhere within and outside the city to access the proposed development.

It is clear that the Local Plan assumptions that the Ramboll letter cites as mitigation no longer apply, and in any event would not affect the overall conclusion of 'Significant Adverse' effects on air quality.

2. *"The site's location is adjacent to existing cycle and pedestrian routes to the north and south across Honiton Road, which would encourage walking and cycling. The scheme would deliver an important and much needed Toucan crossing on Honiton Road to provide an improved connection for pedestrians and cyclists across Honiton Road from Sowton."*

As set out in Exeter Cycling Campaign's response dated February 2018, cycle infrastructure in the area is very poor and the provision of one Toucan crossing on Honiton Road is not sufficient to address this and enable more people to make the switch from driving to cycling and improve air quality as a result.

3. *"Discussions are also on going with Devon County Council (DCC) Highways to provide a significant infrastructure for a new Bus Route for East Exeter. If this scheme was approved the applicant has committed to providing a £150,000 road widening programme to provide for a right turn lane for a Bus Only link into the residential estate to the north. This Bus Route is a substantial investment and important piece of infrastructure to achieve the goals on air quality and sustainable transport for East Exeter."*

While contributions to public transport are welcome, £150,000 is a very small sum in the context of the financial value of the proposed development to the applicant and more importantly to the scale of its negative impact on air quality (Substantial Adverse). As set out in our response dated February 2018, if planning permission is granted, it is essential that the level of contribution to sustainable transport is sufficient to deliver at least the scale of modal shift that the Monkerton train station was intended to have, and that substantial upgrades are made to active travel infrastructure between the site and city centre.

Exeter Cycling Campaign also query why the limited contribution being discussed relates to delivery of a 'right turn only' lane from the site into Persimmon's residential development to the north. A £75,000 contribution has already been secured through the S106 agreement for approved application 17/0440/RES to deliver a bus-only access from that site into the proposed development. Unless the applicant/DCC are expecting regular queuing to develop at the entrance into the proposed development, then a specific right turn lane for buses does not seem necessary, or likely to make a significant enhancement to bus services. If queuing is expected, this reinforces the argument that the development will worsen traffic congestion and air quality, and indeed create a hostile environment for pedestrians and cyclists that will further reduce the

likelihood of people walking and cycling to the development. The more likely people are to drive, the worse air quality and public health outcomes will be.

4. *“Electric charging points are to be installed within the car park to encourage the use of electric vehicles: two charge points would be supplied.”*

Two charge points in the context of 400+ car parking spaces is not likely to have any significant effect on mitigating air quality impacts. Furthermore, petrol and diesel cars will not be banned in the UK until 2040 and in the meantime the proposed development will have a ‘Substantial Adverse’ impact on the already dangerous air quality along East Wonford Hill and through Heavitree.

5. *“Cycle racks/storage would be provided on the proposed development.”*

This is welcome but will have very little impact on encouraging or facilitating modal shift and improving air quality in the context of the poor quality cycle links to the majority of surrounding areas, notably along Honiton Road towards the city centre and to Sowton (where routes are limited/non-existent and cyclists must navigate the stop/start crossings of Moor Exchange roundabout and other crossings). The large surface car park is also a dangerous environment for cyclists and it is unlikely that many people would assume they could park their bikes given the unattractive approach to the stores.

Yours sincerely

Seb James

for and on behalf of:

EXETER CYCLING CAMPAIGN

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Matthew Diamond
 Planning Case officer
 Exeter City Council
 Civic Centre
 Exeter

Dear Matt

MOOR EXCHANGE, EXETER: ADDENDUM AIR QUALITY ASSESSMENT

Date 21/03/2018

This letter provides additional air quality information with regards to Moor Exchange, a proposed retail led development to be located on Honiton Road, Exeter. A planning application for Moor Exchange was submitted by CPG Development Projects Ltd in February 2018, which was accompanied by a number of technical assessments including an Air Quality Assessment.

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Following submission, the Air Quality Officer at Exeter City Council requested that the scope of the air quality assessment be extended to encompass an additional road link. This was to assess the potential impact from the development upon East Wonford Hill, a location currently experiencing poor air quality which could potentially be impacted by additional traffic associated with the proposed development. The results of this additional air quality modelling are presented in this Addendum Report.

Ref L1700001687_210318

Scope

The scope of the addendum report is limited to the following:

- Modelling of traffic sourced pollution on East Wonford Hill, derived from traffic data provided by the clients traffic consultant, Vectos;
- Prediction of NO₂ and PM₁₀ concentrations at the ECC diffusion tube air quality monitoring location with and without the proposed development;
- Providing an impact description following IAQM guidance; and
- Provide details of the mitigation measures that are to be included within the proposed development to mitigate and offset the impacts as a consequence of the additional traffic generated by the proposed development.

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It should be noted that the addendum report does not repeat information already included within the original assessment (Dated January 2018). As such it should therefore be read in conjunction with this report to provide a complete assessment of likely impacts as a result of the proposed development.

Methodology

Traffic Impacts

Potential impacts on air quality due to local traffic emissions have been predicted using the ADMS Roads (version 4.1) dispersion model, following the methodology laid out in the original air quality assessment.

Receptors

Annual mean concentrations of NO₂ and PM₁₀ have been estimated at the ECC Diffusion Tube monitoring location (DT55) as shown in Figure 1. This diffusion tube is located against the façade of a residential property and represents the worst case roadside exposure adjacent to East Wonford Hill.

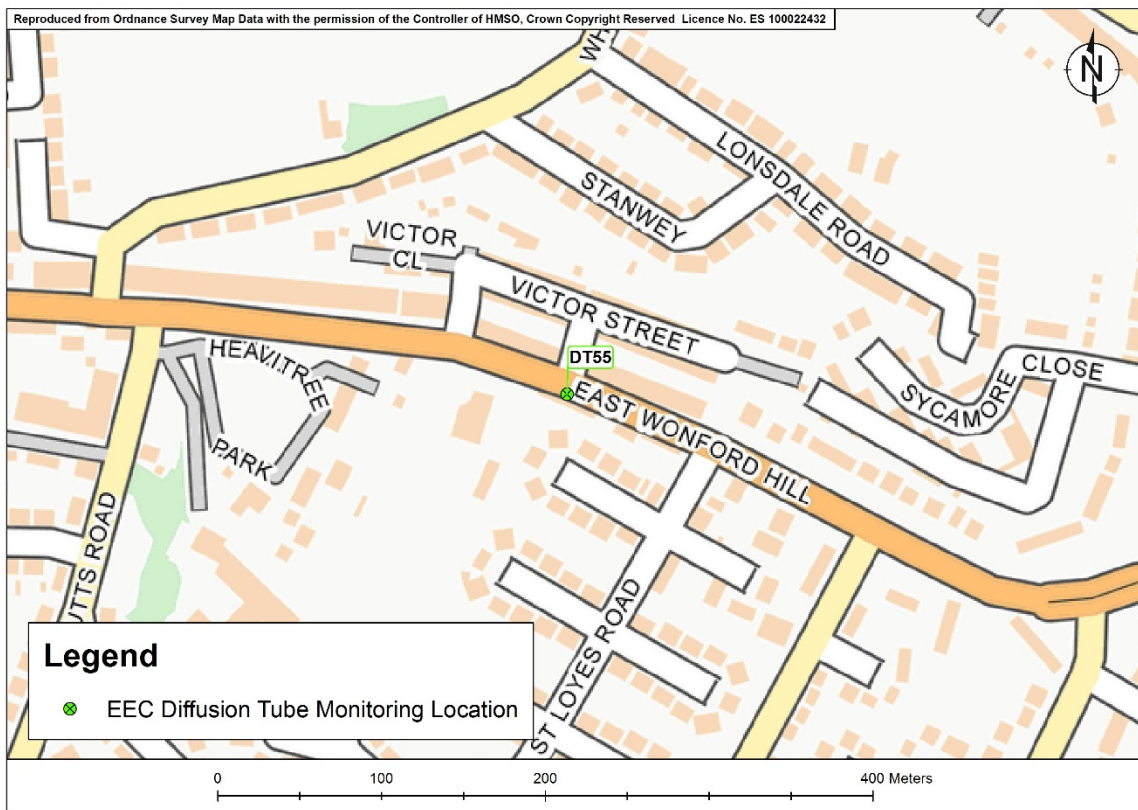


Figure 1: Receptor Locations

Traffic Data

The predicted traffic flows were provided by Vectos, the applicants transport consultant and is presented in Table 1.

Vehicle speed was estimated based upon typical traffic speeds from Google Maps and the road speed limit.

Table 1: Traffic Data

Road	Speed (KPH)	2016 Base		2020 Future Base		2020 Future Base with Development	
		All Vehicles	% HGVs	All Vehicles	% HGVs	All Vehicles	% HGVs
East Wonford Hill, west of junction with Rifford Road	12	21,981	4	23,256	4	25,126	4

Background Concentrations

The ADMS Roads modelling software estimates concentrations arising from emissions on the local roads. It is necessary to add an estimate of the background concentrations to obtain the total concentration for comparison against the air quality objectives.

To predict NO₂ and PM₁₀ concentrations, background pollutant concentrations have been obtained from the Defra maps of predicted background pollutant concentrations which have been produced to aid local authorities in carrying out their Review and Assessment of Air Quality work. The concentrations used in the assessment for 2016 and 2020 modelled background levels of pollutants are provided below in Table 2 and 3.

Table 2: Annual Mean Defra Background Concentrations for 2016

X (m)	Y (m)	Total NO _x (µg/m ³)	Total NO ₂ (µg/m ³)	Total PM ₁₀ (µg/m ³)
294500	92500	12.9	9.7	13.7

Table 3: Annual Mean Defra Background Concentrations for 2020

X (m)	Y (m)	Total NO _x (µg/m ³)	Total NO ₂ (µg/m ³)	Total PM ₁₀ (µg/m ³)
294500	92500	11.1	8.4	13.4

Model Verification

The predicted 2016 existing concentrations were compared with monitored data at the modelled receptor (DT55) to determine whether the model results needed adjusting to more accurately reflect local air quality.

Dispersion modelling results should be within 25% of monitored concentrations, ideally within 10%. The results are provided in Table 4.

The comparison of monitored and modelled concentrations indicates that the ADMS Roads model has tended to under predict concentrations compared with that monitored at the diffusion tube site. To ensure a conservative approach it was considered appropriate to adjust the results using the

methodology given in LAQM.TG(16). An adjustment factor of 2.65 has been calculated and applied to the results.

Table 4: Model Verification

Monitor	Modelled Roadside NO _x µg/m ³	Modelled Total NO ₂ µg/m ³	Monitored NO ₂ µg/m ³	% Difference Modelled to Monitored NO ₂	Total NO ₂ after adjustment µg/m ³	% Difference in NO ₂ after adjustment
DT55	41.8	30.7	58.0	-47.1	58.0	0.1

Significance Criteria

The significance criteria provided in the guidance produced by IAQM and EPUK, Land-Use Planning & Development Control: Planning for Air Quality on assessing the impacts of developments on air quality, has been used to assess the significance of effects on air quality as a result of the proposed development.

Operational Air Quality Impacts

Predicted Concentrations - 2020

The predicted concentrations of NO₂ and PM₁₀ at individual receptors with and without the proposed development using the predicted 2020 emission factors and backgrounds is given below in Table 6 and Table 7, together with the predicted impact descriptor using the EPUK/IAQM significance criteria.

Table 5: Predicted Annual Mean NO₂ Concentrations at Receptors (µg/m³)

Receptor	Baseline NO ₂	With Development NO ₂	Increase in Annual Mean NO ₂ µg/m ³	% Change in concentration relative AQAL	Impact Descriptor
DT55	46.8	49.2	2.4	6	Substantial

Table 6: Predicted Annual Mean PM₁₀ Concentrations at Receptors (µg/m³)

Receptor	Baseline PM ₁₀	With Development PM ₁₀	Increase in Annual Mean PM ₁₀ µg/m ³	% Change in concentration relative AQAL	Impact Descriptor
DT55	15.6	15.8	0.1	0	Negligible

Assessment of Results

The predicted concentrations at a relevant exposure location (Façade location) provided in Table 6.1 and Table 6.2 indicate that the additional traffic generated by the proposed development will result in a 2.4 µg/m³ increase in NO₂ concentrations and 0.1 µg/m³ increase in PM₁₀ at the East Wonford Hill diffusion tube location. Where air quality is already predicted to exceed the air quality objective by more than 110 % an increase of this magnitude is described as substantial adverse.

Mitigation

The principle of the scheme is to serve as a retail hub to the local community and East Exeter district. Within the Monkerton and Hill Barton Masterplan and subsequent Exeter City Council (ECC) Allocation Plans it was considered that the site is best located to achieve sustainable travel for the wider community to meet daily shopping needs. The site conveniently straddles 900 residential homes and is within a short walk for many 1000's of employees including:

- The Met Office (1,300 Staff) to the north;
- Devon & Cornwall Police HQ (1,600 staff) to the west;
- Sowton Industrial Estate to the South; and
- Exeter Business Park to the East.

It is envisaged that significant numbers local residents and employees would be able to walk to the scheme at lunch time or after work to meet their shopping needs. At present employees across East Exeter often use the car during the day to travel further afield to existing retail locations, such as Heavitree, Sainsbury's Pinhoe or Tesco Rydon Lane, thus Moor Exchange would help to avoid generating additional vehicle traffic on local roads during the day and at peak hours immediately after work

Along side the principles above, to offset the air quality impacts arising from the proposed development a number of mitigation measures have been put forward as detailed below:

The site's location is adjacent to existing cycle and pedestrian routes to the north and south across Honiton Road, which would encourage walking and cycling. The scheme would deliver an important and much needed Toucan crossing on Honiton Road to provide an improved connection for pedestrians and cyclists across Honiton Road from Sowton.

Discussions are also on going with Devon County Council (DCC) Highways to provide a significant infrastructure for a new Bus Route for East Exeter. If this scheme was approved the applicant has committed to providing a £150,000 road widening programme to provide for a right turn lane for a Bus Only link into the residential estate to the north. This Bus Route is a substantial investment and important piece of infrastructure to achieve the goals on air quality and sustainable transport for East Exeter.

Electric charging points are to be installed within the car park to encourage the use of electric vehicles: two charge points would be supplied.

Cycle racks/storage would be provided on the proposed development.

Conclusions

The modelling has indicated that predicted traffic generation as a result of the proposed development could result in a substantial adverse impact at the East Wonford Hill diffusion tube where there is relevant exposure. This is largely due to the existing high pollution concentrations experienced at the façade of these properties which are located immediately adjacent to the roadside, where traffic is often stationary or slow moving on an incline. Air quality at this location has consistently exceeded the annual NO₂ objective of 40 µg/m³.

At all other façade locations modelled the predicted impacts in 2020 as a result of the proposed development result in negligible impacts.

It is not feasible to directly mitigate off-site air quality impacts. However, to offset the impact at East Wonford Hill a number of measures have been introduced into the proposals which would have a positive impact on air quality by encouraging pedestrian, cycling and bus access and through the provision of electric charging points. It is therefore considered that the air quality impacts would be appropriately mitigated.

Yours sincerely



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