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21 October 2019

Matt,

EUTOPIA HOMES (EXETER) LIMITED
FORMER EXMOUTH JUNCTION RAIL SIDINGS, LAND SOUTH OF PRINCE CHARLES ROAD, EXETER, EX4 7AE
OUTLINE APPLICATION FOR THE CONSTRUCTION OF 400 RESIDENTIAL DWELLINGS (CLASS C3), 65 SENIOR LIVING WITH CARE UNITS (CLASS C2), NEW PUBLIC OPEN AND GREEN SPACES, ACCESS ROAD, REFURBISHMENT AND EXTENSION OF LOCALLY LISTED FORMER WATER TOWER, AND ASSOCIATED WORKS (LANDSCAPING RESERVED FOR FUTURE CONSIDERATION)
PLANNING REF: 19/0650/OUT

I write in respect of the above planning application and requests for additional highways and transport information from Devon County Council.

This letter supplements information provided by our team by email on 05 July and 16 September 2019.

Stoke Hill Roundabout

Our highways consultant, Aecom, assessed the operation of this junction within the Transport Assessment ('TA') and produced the attached additional Technical Note ('TN') following the comments of Lloyd Orriel of Devon County Council Highways Team. This was submitted to you on 16 September. Further queries were raised by DCC Highways officer on 01 October. Our further response on this is set out below.

It is stated within the TN, at point 2.5, that there are discrepancies in the validation of queue lengths between the adjusted model and surveyed queues, and that full details surrounding the modelling approach are provided within section 4.3.2 of the TA.

It has been highlighted in both the TN and TA that the ARCADY module of the Junctions 9 software becomes disproportionately sensitive to changes in traffic flows, which can lead to the model overestimating increases in RFC and associated queuing and delay when the model is operating at or near to capacity. Given therefore that the modelled increase in queueing, delay and/or RFC cannot be used to quantify the proportional impact of the Exmouth Junction development, the use of percentage increase in vehicle trips

has been used as a quantifiable value. The TN sets out multiple approaches to the percentage increase in vehicle trips and has proposed a contribution in line with the greatest increase in trips for a single movements at the roundabout (15% increase). As stated at point 3.10 of the TN, if considering the junction as a whole, the overall increase in vehicle trips across all movements is only 4%.

Despite the deficiencies in the ARCADY module of the Junctions 9 software, this remains the most appropriate method for modelling Stoke Hill Roundabout. Within the scale of this project, there is no suitable software package that can more appropriately forecast the future impact of the development on a roundabout that is over capacity in the base situation. The reason for using the percentage increase in vehicle trips is due to the fact that the ARCADY model is unable to reflect what will happen in reality and provide quantification for this, and therefore shouldn't be used as a reason to discredit the use of the percentage increase to provide some quantification to the development to assign a proportional contribution to the scheme cost.

The subsequent comments by Lloyd Orriel also referred to consideration of the pedestrian and cycle safety implications at Stoke Hill roundabout. This is already covered within the TA at section 3.7 and it is acknowledged that there is an accident cluster at Stoke Hill Roundabout. There is no sensible way to quantify the pedestrian and cycle trip increase based on the approach used and agreed during scoping with the Local Highway Authority for the TA.

Therefore by offering a contribution based on the greatest increase in vehicle trips at any single movement at Stoke Hill Roundabout (15%), as opposed to averaging the increase across the whole junction (4%), it is felt that a fair and proportional contribution is being offered to take this element of the scheme into account, based on the only quantifiable data available.

In summary, we highlight the following important points:

- The junction is currently operating over-capacity.
- Without the development the junction would still experience queuing at peak times.
- Using ARCADY as the method to assess the impacts on the junction is the most appropriate method.
- Our modelling of the proposed traffic flows through the junction post-development shows that the greatest increase on any arm will be 15%, however, looking at all arms of the junction, the total increase is only 4%.
- In light of the above figures, these increases can only be considered to be minor increases in traffic flows and therefore they will have minor effects. As you are aware, the NPPF states that applications should only be refused if the impact is 'severe'.
- An increase in traffic of 15% is therefore considered very robust. Applying this percentage increase to the total cost of the junction improvement scheme is therefore considered a fair and reasonable method of calculating an appropriate financial contribution.

Morrisons and on-site mini-roundabouts

In respect of the Morrisons and the on-site mini-roundabouts, we have provided additional information as requested so they now clearly show the proposed cycle and pedestrian walkways on the site and how they link up with those outside of the site. This plan can be found in the enclosed document by Darling Associates 'Response to DCC Highways Requests for Further Information'. This clearly demonstrates that the site will be easily accessible to pedestrians and cyclists and will be fully connected with the walking and cycling infrastructure outside of the site.

Mount Pleasant Road access

In the initial comments, Lloyd requested that the access point from Mount Pleasant Road should be narrowed to provide priority to pedestrians walking along Mount Pleasant. We now include a plan within the Darling Associates document which shows this junction being amended to reduce the 'bell-mouth' whilst still allowing access for emergency vehicles. This narrower bell-mouth now addresses the point previously made and ensure pedestrians walking along Mount Pleasant can do so safely.

Car parking

As previously stated a full Car Park Management Strategy will be produced to demonstrate in detail how access will be controlled. The details of this can be secured by a planning condition. Further, to ensure potential parking stress in surrounding residential streets is reduced, the applicant agrees to make a contribution of £20,000 towards extending the Residents' Parking Zone on local residential streets and accept a restriction on residents of the proposed development applying for residents parking permits.

The applicant has been in discussions with a provider of electric vehicle charging solutions to provide Exmouth Junction with an electric mobility solution encompassing electric vehicles charging points ('EVCPs'), site specific Electric Car Club and Electric Cycle provision to service residents and tenants of the scheme as part of an ultra-low emissions and green travel transport solution. The provider will partner with a company which will provide electric and hybrid vehicles to hire.

Having reviewed the quantum of development and its makeup, a proposal (based on their experience of what is likely to be required) has been suggested:

- 24 x electric bikes for hire (provided in 6 locations with 4 docks for bikes).
- 10 x electric vehicle charging points (1 for Block A, 4 for the town houses – one space at the end of each row, 4 at the PRS Blocks – 2 electric car club cars and 2 EVCs for site wide use and 1 space for Block D C2 use).

This is discussed in further detail below.

Cycle parking

As previously stated, across the entire site there will be space for over 1,000 cycles, both stored internally (secure facilities within buildings) and externally (Sheffield stands). Additionally, a number of electric bikes will be provided by the same provider as the electric car club vehicles (as above, in the region of 24 bikes).

On-site layout

Several comments were made previously in respect of which roads within the site will be privately maintained and which will be adoptable by the Highways Authority. To clarify this, a plan is included within the enclosed document which clearly defines the extent of the adoptable highway. The only part of the site which will be adoptable will be the initial entry point up to the mini roundabout within the site.

Additionally, a comment was made regarding the vehicle tracking of the 'spine' road within the site, running along the northern boundary of the site. In particular, there is a 'chicane' located to the north east of the

'Village Green' area, and to the north-west of Block B. This is referred to as 'Window C' in the vehicle tracking exercise within the TA. This has now been amended so two vehicles can adequately pass each other at this point.

Proposed links through the allotments

We still question the necessity of a suggested link through the allotments, given that we have already demonstrated within Section 3.5 of the TA that the scheme is within the 'IHT Guidelines for Providing Journeys on Foot' to important local amenities such as the health centre, supermarket, Stoke Hill Junior School and Exeter Academy.

For that reason and because the allotment land is not in our ownership, a link does not form part of our application. However, if this is something that Devon County Council wishes to pursue in the longer term with ECC, then they are free to explore that. We include a plan for information which shows how the application in its current form could link into this and would not prejudice this coming forward, if ever built, and if the Council as land owner of the allotments is agreeable to releasing the allotment land required.

If ECC agree to the release of the allotment land and find that the application should provide a financial contribution to fund these works, it would of course have to meet the standard tests, i.e. it must be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

Travel Plan

The highway comments firstly state that the application site is a 'strategic allocation'. This is not correct, and the adopted Local Plan does not allocate the site for housing.

The Travel Plan we have submitted is a 'Framework Travel Plan' ('FTP') as is completely standard practice for planning application stage. A Full Travel Plan will be produced and submitted via discharging an appropriately worded condition and a travel plan co-ordinator appointed. The full Travel Plan will include details such as provision of welcome packs for residents, travel vouchers, travel plan surgeries, and post-development monitoring. Additionally, it will include details on the proposed electric vehicle car club and electric bike hire scheme.

The makeup of the proposed development is very different to standard residential developments. It is located within the existing urban area in an accessible location, and over 200 of the units will be for Private Rented Sector ('PRS'). Tenants in the PRS units will predominantly be young professionals who work in the City Centre and having a car is not a priority for them. Upon renting a property, they will know that it does not come with a car parking space and they are attracted to the development because of the proximity to work, the ability to walk and cycle there, good access to public transport, and the overall high-quality feel and appearance of the development.

Developments such as Hill Barton, Monkerton, Pinhoe or East of Exeter are not close to the City Centre, have been developed by volume housebuilders and are very 'car-centric' due to their location and number of car parking spaces on site (typically more than 1 per dwelling). Due to the sustainable location of the application site and the aspirations of the developer, a more bespoke Travel Plan solution is required, which our Travel Plan will deliver.

Electric Car and Bike Scheme

As outlined above, the applicant is currently working with a provider of electric vehicle charging points and electric car and cycle hire to create an option at the site for ultra-low emissions travel. They will partner with other SW firms to provide the cars and cycles for hire. The scheme will comprise a number of electric vehicle and cycle ('EV') charging points with allocated parking space. Electric and hybrid cars and electric bicycles will also be bookable using smartphone technology, and available to hire from a few minutes to several days.

Nationally, the Government's ambition is that 50-70% of all new car sales to be 'ultra-low emission' by 2030. At a local level, within the Exeter Sustainable Transport SPD requires that 'as a minimum, ducting and potential for easy connection to the electricity network should be provided'.

Across the site there will be 10 charging points installed for residents to charge their own electric or hybrid vehicles. Additionally, an area allocated specifically for EV car club cars will have 2 charging points. There will be docking stations of 24 electric bikes available for hire.

Further information on this system will be set out within the Full Travel Plan.

I trust this information is useful and enables the formal highways response to be issued by DCC.

Yours sincerely,

PHILIP MARSDEN
ASSOCIATE DIRECTOR
CBRE LTD