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**From: Development Management (Exeter)
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Our Ref: EX/1380/2020

Case Officer: Lloyd Orriel
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PLANNING APPLICATION – HIGHWAY CONSULTATION REPLY

APPLICATION NO: 20/1380/OUT

APPLICANT: Mr Ian Jewson

DETAILS OF APPLICATION: Outline planning application for up to 80 dwellings and associated infrastructure (All matters reserved except for access).

LOCATION: Land At Redhills Exwick Lane Exeter Devon

Observations:

The submitted outline application is proposed residential development of up to 80 dwellings (all matters reserved except for access) at the Land at Redhills, Exwick Lane, Exeter.

Trip Generation

The submitted Transport Statement (T.S) suggest two-way peak hour vehicular trips for the residential development is to be in the region of 30 movements (or a trip rate of 0.375). It is stated that these trip rates have been taken from the TRIC's database; but no TRIC's analysis has been provided to justify the use of such low trip rates. The site by its nature is in an unsustainable location; with inadequate access to pedestrian and cycling facilities (discussed later in the response) and very limited access to public transport. The applicant should note that allocated sites, that have an access strategy have higher trip rates than those advocated in this application.

The site itself is located on the edge of Exeter which gives tendency for the development to become car dependant, with limited opportunities to travel by sustainable means. The applicant must provide evidence to justify the trip rates used. It is noted that most of the trips will be Southbound (towards Exeter). No junction analysis work has been undertaken.

Access

A vehicular access is to be created onto Redhills; this is subject to 30mph and to ensure safe & suitable access, appropriate visibility splays should be abided to. Upon site visit, visibility was obscured by vegetation. There are doubts as to whether visibility stands (2.4 by 43m with no obstructions over 600mm), can be met. The access will provide a 5.5m carriageway and 2m footways into the site, which is acceptable in principle, but it is desired that the radii into the site is tightened to ensure slow speeds into a residential development. However, if the applicant wants to proceed with the proposed access arrangement, visibility splays need to be confirmed. This is to ensure safe and suitable access can be achieved.

Upon site visit there was very limited opportunities to connecting the site to the public highway by sustainable measures.

- To the west of the site, the most convenient and direct route to St Peters Mount is on Redhills which has no footway at all. Drawing number 19.124/001 Rev C shows that pedestrians and cyclists are to join Redhills on the vehicular carriageway with no sustainable infrastructure; this is contrary to paragraphs 108 and 110 of the NPPF and ECC Core Strategy CP9
- To the east of the site, the applicant wishes to utilise the existing footpath connection that links Exwick Lane with Gloucester Road via St Peters Mount. Upon site visit this link was substandard in terms; of its width (in part) – sections were not wide enough; it's construction (materials are not to suitable for pedestrians); its lack of street lighting and its gradient (does not meet adoptable standards – too steep to be used by all users);
 - In relation to the eastern path, there was a significant number of steps to overcome to reach Gloucester Road. This does not promote walking or cycling to the site and nor does it provide suitable access for all users on the site, contrary to the sustainable mantra of the NPPF.
- To the north of the site, there are three connection points to Exwick Road proposed. The eastern access exists via a set of stairs however no details have been given as to how the remaining two access points are achieved in terms of its engineering and safety. Nevertheless, Exwick Lane is a single-track road and the applicant is proposing more footfall on the road. Upon site visit, passing a pedestrian whilst in a vehicle can become difficult due to the nature of the road. In some instances, vehicles have to stop and wait to let pedestrians by. Exwick Lane can be used as a “rat run” from Redhills to Peterborough Road and therefore an increase in conflict between pedestrians/cyclists and motor vehicles is a significant concern, contrary to the NPPF.

The applicant is made aware that the North-South route to the east of the site is not highway (HMPE) and it is unknown if the applicant has approached the landowner to see if this access can remain open in perpetuity. The only section of highway is between St Peters Mount and Gloucester Road.

The nearest bus stop is on Gloucester Road, however, any pedestrian wishing to use this would have to overcome the issues highlighted above. Given the lack/substandard of suitable pedestrian and cycling infrastructure (and indeed if safe & suitable access can be achieved), the site is reliant on the private car and is unsustainable.

This is contrary to Paragraphs 108/110 of the NPPF and CP9 of the ECC Core Strategy. In addition to this, ECC have declared carbon neutral aspirations by 2030 by and DCC have declared a climate emergency; therefore, any applicant should promote sustainable transport modes. No Road Safety Audit has been undertaken.

Internal Roads and layout

Well-designed residential streets are central to sustainable development and therefore the design of the internal road layout must accord with the principles of Manual for Streets and appropriate sustainable design guidance.

The applicant is advised that car parking standards are set out in the Exeter City Residential Design Guide and that secure cycle parking facilities will need to be in accordance with chapter 5 of Exeter City Councils Sustainable Transport Supplementary Planning document. As an outline application these details are reserved for approval at a later stage (together with cycle parking requirements).

Travel Planning

In accordance with paragraph 111 of the NPPF the development will be required to have a Travel Plan. DCC is currently adopting an approach for residential Travel Planning in the Exeter area with contributions paid directly to the Council for them to implement the Travel Plan and its measures. Consequently, a contribution of £500 per dwelling should be secured through S106 agreement.

Construction

The proposals will require demolition/construction work adjacent to a busy environment. To protect the safety of users of the public highway it is essential that the construction arrangements are carefully managed, and that appropriate space is available off the highway for all construction plant/vehicles.

Summary

In conclusion, further information is required to satisfy the highway authority that all of the proposed elements are acceptable. In particular, further information on the

- Justification of the vehicular trip rate and the sustainability of the site
- Vehicular Access Point
- Safe and suitable pedestrian and cycle infrastructure to reach the site

In the absence of this information then the highway authority, at this time, would be minded to recommend refusal.

Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, IS LIKELY TO RECOMMEND REFUSAL OF PLANNING PERMISSION, IN THE ABSENCE OF FURTHER INFORMATION.:-

Officer authorised to
sign on behalf of the County Council

Date: 2nd December 2020