

Proof of Evidence – Appropriate Location

REF: EGG/722/KH

NORTH HOME FARM, EXETER

ECC 21/0223/OUT - APP/Y1110/W/21/3287921

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1. Executive Summary

1.1. The appellant has provided a convincing argument “on paper” that the proposed development is sustainably located. They claim that a wide range of facilities can be reached within 10 mins walk of the site. My evidence demonstrates that these claims are not true and that active travel is not a genuine choice.

1.2. The appellant suggests that public transport is also a genuine choice. I demonstrate that the site is a 22 min walk up an average 5% gradient from the station and a 17 min walk up an average 5.5% gradient from the nearest bus stop (with regular service). According to an assessment by the non-statutory consultee, Exeter Cycling Campaign, the route to the proposed development is “not considered safe for cyclists”.

1.3. I also provide evidence that the proposed scheme conflicts with the spatial approach set out in ECC’s development plan policies and is contrary to policy H1 of the Exeter Local Plan First Review (ELPFR), which stipulates that greenfield sites should be considered only where previously-developed alternatives are unavailable.

1.4. I conclude that the proposed site is not accessible or sustainable and does not meet the social and environmental sustainability objectives outlined in the NPFF¹ and would increase, not reduce, greenhouse gas emissions, contrary to NPFF 154 (b) and Policy CP1 of the Exeter Core Strategy (ECS). It is my view that significant weight should be given to these conflicts in the overall planning balance, especially in light of ECC’s strong housing delivery record, “modest” housing shortfall, and the availability of more sustainably located, previously-developed sites in the city.

2. Introduction to Witness

My name is Katie Hill. I am a qualified walk-leader and provide coaching to empower walking. I am an Exeter resident and am a member of Exeter Greenspace Group. I submitted an objection to the development in 2021 and am submitting this extended proof of evidence specifically focussing on locational sustainability arguments.

¹ NPFF, 8 (b-c)

3.0 Scrutiny of the appellants claims for locational sustainability

3.1 In Figure 4 of the appellants Design & Access Statement they claim “a wide range of facilities accessible to the site within a ten minute/800 metre walking radii of the site and Stagecoach bus routes 3, 13, 25 and 29 connect Pinhoe to the City Centre with bus stops located on Harrington Lane, Church Hill and the B3181 (Main Road), ***all within the 10 minute walk / 800m distance of the site***”. The appellant states that the nearest bus is less than 600m away.

There is no empirical evidence provided by the appellant to support these distances or timings.

3.2 Figure 3.2.1 below shows the shortest walking route on pavements from the nearest bus stop (for bus 1) to the central point of the proposed development (blue line) and the bus routes (red lines). This can be viewed online <https://www.plotaroute.com/route/1976739> in greater detail. This is 948 m with an average gradient of 5.5%. This time estimated for a healthy adult with a BMI of 26 to do this journey is estimated to be 17 mins from the bus stop to the estate. The distance of 600m quoted is the distance walked along a busy single track road with no pavement and it the distance from the nearest edge of the development to the bus stop with an hourly service. A safe pedestrian route has been made through home farm south but there are significant ascents and descents. Over some stretches the gradient is 9%.

Figure 3.21: Transport Map of Pinhoe showing distance between proposed development and nearest bus stop.

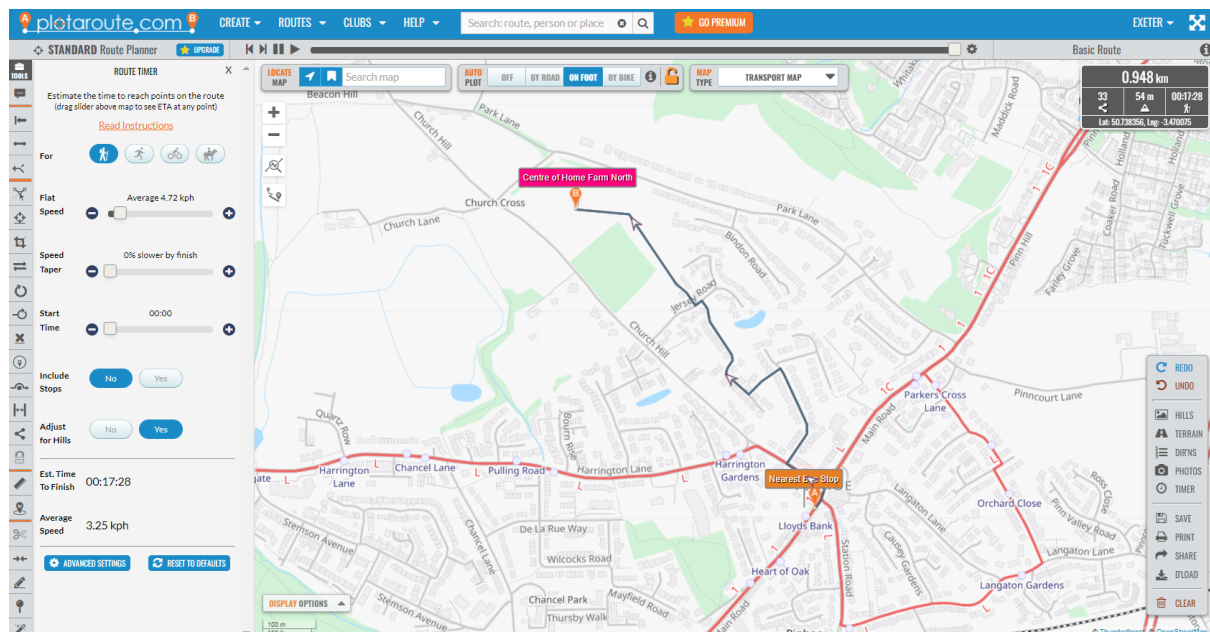


Figure 3.2.2 is a table of distances, gradient and journey times from local amenities to the centre of the proposed development using public footpaths/pavements using the most direct route. The actual routes can be verified via the online reference. The time taken is calculated by using the “usual outdoor walking speed for healthy adults” of 1.31 m/s (2.93 mph / 4.72kph)² adjusted for hills by the plotaroute algorithm.

Figure 3.2.2: Distances from amenities to centre of proposed development, Home Farm North

Amenity	Distance (m)	Average Gradient	Estimated Time	Reference
Shop (Spar)	939	5.4%	17 mins	https://www.plotaroute.com/route/1976763
School	1088	4.8%	19 mins	https://www.plotaroute.com/route/1976758
Doctor	1306	5%	23 mins	https://www.plotaroute.com/route/1976770
Station	1256	5.2%	22 mins	https://www.plotaroute.com/route/1976777

Figures 3.1 and 3.2 clearly demonstrate that there are not any amenities within a 10 min walk / 800m of the proposed location. In fact, due to the topology of the area the majority of amenities are closer to 20 mins away and the gradients are difficult for all but the fittest residents.

3.3 Research³ shows that a 1% increase in gradient results in a 10% reduction in “walkability”. The average gradient of 5% between amenities and the proposed location is on the top limit recommended by the manual for streets⁴ and gradients over 2.5% are considered impossible for manual wheelchair users⁵. Exeter City Council has set a target of 50% of residents engaging in active travel⁶. With distances to amenities exceeding the 800m walkable neighbourhood target and

² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7806575/>. This value is based on the latest research for flat walking speed. “Average healthy adults” are those with an average BMI of 24.8 +/- 3kg with a mean age of 44 +/- 17 years. Thus this speed is thus not achievable for certain groups of the population.

³ <https://www.sciencedirect.com/science/article/pii/S2352146517309924>

⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf

⁶ <https://www.liveableexeter.co.uk/news/active-travel/>

gradients meaning that walking is 50% less attractive than a linear walk means that the proposed development will be unattractive for active travel for most and impossible for some. In the Pennsylvania appeal within the last year⁷, the inspector stated in her refusal letter that “the appeal site is located on a hill and therefore to access services and facilities on foot would involve walking down and up a relatively steep incline. She stated: “This would not be practical if carrying shopping or pushing a buggy for any distance. I do not therefore consider the location to be accessible”.

3.4 Pinhoe is served by two buses. The L which is timetabled⁸ hourly and runs along the city high street and the 1 which is timetabled⁹ more frequently, but that stops at the bus station. A recent community survey however suggests that buses do not always run to these timetables, with the L bus being highly unreliable. The community facebook page of the Exeter area bus action group <https://www.facebook.com/TEABAGEXETER> demonstrates the level of poor service. This poor level of service combined and 5.5% gradient and nearly a kilometre walk from the nearest No 1 bus route means that bus travel is not a practical choice for most residents. Further bus cuts are proposed from August 2022 which will make public transport even less viable.

3.5 According to Exeter Cycling Campaign’s Martin Crothall in his original objection¹⁰ “The site is not conducive to active or sustainable travel, and will result in people relying on private cars. Exeter City Council is committed to getting 50% of (internal to Exeter) journeys made on foot or by bike; this development will not help achieve this goal. Indeed the *applicant's own Transport Statement indicates the majority of journeys (73%) to and from the site would be expected to be made by car*, with only 2% of journeys made by cycle (this is representative of current cycling rates in the area¹¹). Church Hill is a steep and narrow sunken lane with no footpath for much of its length and is **not considered a safe route** for cyclists or pedestrians.” ECC agree that the modal balance proposed in the transport statement is not acceptable for an urban extension but suggest that S106 contributions could be made to mitigate the problem. I disagree that any funding spent on cycle paths could mitigate against a 5% gradient. If as part

⁷ Land at Pennsylvania Road (PINS ref: APP/y1110/W/20/3265253) para 101.

⁸

https://tiskon-maps-stagecoachbus.s3.amazonaws.com/Timetables/South%20West/23rdMay22/250522/L_250522.pdf

⁹

https://tiskon-maps-stagecoachbus.s3.amazonaws.com/Timetables/South%20West/January2021/COVID/1_250121.pdf

¹⁰

<https://publicaccess.exeter.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=QOB104HBLUJ00&neighbourCommentsPager.page=6>

¹¹ <https://www.facebook.com/pinhoecollective/photos/gm.5409913129074407/574447450757194/>

of the conditions it could be stipulated that each new resident should receive a £2500 electric bike voucher and appropriate secure storage for e-bikes was designed into the scheme as part of reserved matters, this could help to mitigate the poor modal split. The expectation that new residents would either cycle manual bikes and cargo regularly up a 5% gradient or to buy their whole family e-bikes is unrealistic and thus non-compliant with NPPF.

3.5 Section 105 of the NPPF states that “The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” ***The gradient of 5% between amenities and the proposed development and lack of reliable public transport within 800m means that there is not a genuine choice for travel and thus the scheme is not concordant with the NPPF.***

4.0 Conflict with ECC’s Spatial Strategy and Policy

4.1 Both the ELPFR and the ECS set out the need to prioritise sustainable development sites to ensure that Exeter grows within its environmental limits. This is to be achieved through delivering a spatial strategy set out by Policy CP1 that focuses on the city centre, existing centres and previously developed land while providing for additional developments in sustainable urban extensions to the east and southwest of Exeter and extending the development of the east Exeter beyond the city’s administrative boundary. This spatial strategy is underpinned by an unequivocal imperative to steer development away from the hills to the north and northwest that are “strategically important to the landscape of the city.”¹² The proposal site is designated as landscape setting in the ELFR and ECS and sits on those very hills that are marked out for protection.

4.2 In the same spirit, ELPFR Policy H1 sets out a spatial hierarchy for assessing planning proposals. “Greenfield developments through sustainable urban extensions within public transport corridors” are at the bottom of that hierarchy and are to be considered only where there are no previously developed alternatives. Moreover Policy H1 was found to be in date by the Inspector of the Land at Pennsylvania Road appeal.¹³

4.3 ECC is currently preparing its new Local Plan which will be underpinned by a bold vision for sustainable brownfield development and urban regeneration. Exeter City Council’s Liveable Exeter programme, while nascent, has clearly identified a host of previously developed sites that will

¹² Exeter Core Strategy para 4.11

¹³ Land at Pennsylvania Road (PINS ref: APP/y1110/W/20/3265253)

support the development of 12,000 homes by 2040. Not only are these sites brownfield, but they are well-connected to local amenities would allow for car-free developments, in stark contrast to the appeal proposal. While the Plan has not yet been adopted, it is incorrect, given the advanced work that has been done to scope sites, to suggest that greenfield development is the only way for ECC to meet its housing requirement. Moreover, there are applications already in the planning system that are on brownfield sites and sustainably located¹⁴ which would provide 350 homes. Therefore, it is my view that this proposal does indeed conflict with Policy H1.

5.0 Conclusion

5.1 The appellant argues that “significant weight” should be given to the timely delivery of housing.

5.2 I strongly disagree with the appellant’s conclusion that the site occupies an accessible location. My evidence shows that the proposal site is not an accessible, appropriate or sustainable location for housing development. It is located on top of a hill and underserved by amenities and public transport. It would increase car dependency at a time of climate crisis and the housing design is not stated to meet specific energy efficiency targets (e.g. passivhaus). I do not therefore believe that it meets the NPPF’s social and environmental sustainability objectives.

5.3 I have also shown how the proposal site conflicts with ECC’s spatial strategy and Policy H1. In the context of an only “modest” housing shortfall and when the LPA scored 155% on the 2021 Housing Delivery Test, I believe this policy conflict should be given significant weight.¹⁵

5.4 Given the evidence of alternative, more sustainable and better-connected sites to meet Exeter’s housing supply, I strongly disagree with the appellant’s view that the proposal scheme offers an “appropriate” opportunity to accommodate growth and do not believe that this factor should be given significant weight in the planning balance.

¹⁴

<https://publicaccess.exeter.gov.uk/online-applications/applicationDetails.do?keyVal=RABXGTHB03800&activeTab=summary>

¹⁵ Land at Pennsylvania Road (PINS ref: APP/y1110/W/20/3265253) para 96. 2021 Housing Delivery Test - <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

