

# East Devon Draft Local Plan: a response from the Exeter Cycling Campaign

## Introduction



The Exeter Cycling Campaign is grateful for the opportunity to respond to the consultation on the [Draft East Devon Local Plan](#).

The Exeter Cycling Campaign has a following of over 3000 people on social media and a newsletter distribution to over 700 citizens in and around Exeter. We regularly respond to planning applications in East Devon district to ensure that new development considers the needs of people who do or could cycle for business, commuting and leisure.

We've chosen to respond to the consultation with this written report so that we can capture the breadth of comments we wish to make. We trust this is an acceptable format for you to consider.

## We welcome

We welcome the stated underpinning of the local plan to make "A greener East Devon, which prioritises issues arising from climate change and supports our natural environment". Building on this we are heartened to read the plan objectives including:

- **Tackling the climate emergency** : Objective 2: *"To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change."*
- **Promoting sustainable transport**: Objective 9: *"To prioritise walking, cycling and public transport and make provision for charging electric vehicles"*

We strongly support the policy goals that:

- *"New development should incorporate the features of a "20-minute neighbourhood" either within the site at larger scale development, or through links to features outside the site for smaller scale development" and that ...*
- *"Walking and cycling links should be prioritised in new development" and*
- *"Cycle paths should be segregated from pedestrians to reduce the potential for conflict".*

We support the proposal that:

1. (Para 11.6): *"The spatial strategy ... focuses development on those places which are or can be made sustainable, through limiting the need to travel to jobs, facilities, shops, schools and leisure; and offering a genuine choice of transport modes"*

We noted too in the Evidence Base cited that:

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- The location of new developments must *'Reduce transport need and gives access to sustainable transport'* ([Low Carbon Study, University of Exeter February 2020](#))
- *'New development should be planned for in ways that... can help to reduce greenhouse gas emissions, such as through its location, orientation and design'* (NPPF para150)
- *'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'* (NPPF Section 9)
- *'Park & Ride sites on all key corridors will provide a realistic sustainable travel option for those trips from rural areas into the city that can't feasibly be served by traditional public transport services'* ([Exeter Transport Strategy 2020-2030](#))

## Summary of main Concerns and Comments

We've given below our most significant concerns about the draft Local Plan.

- A. The Local Plan falls short of its aim of delivering *"a suite of ambitious and implementable policies which addresses the severity of the [climate] crisis that we are all facing"*. We believe the Local Plan would benefit from bolder and more explicit measures to enable low/no carbon transport and nudge citizens away from single-occupancy private vehicles.
- B. Given the positive vision and stated green-plan objectives we were surprised that the evidence base cited didn't include the government's ['Gear Change'](#) strategy<sup>1</sup>. Nor is there mention of extant design standards for cycling infrastructure ([LTN 1/20](#)) or the ['Manual for Streets'](#) design guidance. These are standards that should be mandated as part of the Local Plan.

Furthermore, the important [Devon Climate Emergency Response Group's Carbon Plan](#) is not cited as evidence underpinning the Local Plan. This is a surprising omission.

These standards and strategies should play a greater role in shaping the East Devon Local Plan so that the vision of tackling climate change and promoting sustainable transport are deliverable .

- C. The positive vision and ambitious Objectives laid out in the draft Local Plan echo some of the visions we have seen articulated in different Masterplans across the region over the last few years. However, when actual development has happened these visions can often fail to be realised. This has been the case, for example, in the Monkerton development.

We would therefore echo and endorse the Local Plan's statement that *"The local plan needs to have actual policies that are used in determining planning applications"*. We are

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<sup>1</sup> See also ['Gear Change One Year on'](#)

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eager to see the clear and bold specific policies that are currently missing in this draft being stated in the final iteration of the plan that will make the aspirations a reality.

- D. The success of the East Devon Local Plan and Exeter Local Plan are tied together. One cannot succeed without the other. East Devon's plan to locate developments, especially the new town, on the edge of Exeter could undermine Exeter Council's strategy of reducing single-occupancy private vehicle travel.

The Exeter draft Local Plan commits to working with neighbouring District Councils to ensure alignment of goals and plans. There needs to be a stronger commitment from East Devon to working together with Exeter on coordinating their respective Local Plans.

- E. The Local Plan would benefit from giving much more attention to enabling low/no carbon transportation. The references to '*minimising the need to travel and provide access to sustainable transport*' have little in terms of hard policy to back them up and deliver them.
- F. The plan appears to have missed a section in chapter 7 ("Tackling the climate emergency and responding to climate change") on how transportation (both public and private) will be decarbonised. Granted, transport is a Devon County competence, but the way development is designed greatly shapes the transportation choices people made. The Local Plan will benefit from including this in the final version, with specific proposals on how this will be achieved.
- G. The Local Plan would benefit from bolder and firmer policy to deliver the aspiration to minimise the need for travel and enable movement by bike or foot. It is no longer acceptable to merely accept that 'people will drive'. We need to be moving away from the 'predict and provide' model to a 'decide and provide' model for transport (and housing) design. With transport the most carbon-polluting sector the Local Plan would benefit from bolder measures that will nudge and enable different travel habits.
- H. The [Exeter Transport Strategy 2020-2030](#) is cited in the evidence base. The Local Plan would be improved by having greater alignment with this strategy. For instance, the Local Plan needs more detail in how to deliver one of the Transport Strategy's key proposal: Park and Ride/Change: "*Park & Ride sites on all key corridors will provide a realistic sustainable travel option for those trips from rural areas into the city that can't feasibly be served by traditional public transport services*". All P&R planning should seek to ensure that P&R sites don't actually induce additional driving (as they appear to have done in some cities (e.g. Oxford)).

Under Policy 66 the Local Plan states that some sites/routes will be protected ("*Park and Ride areas of search at A30/Heavitree Road corridor; A376/A4052 Clyst St Mary corridor; and A377 Cowley Bridge Road corridor*"). These appear to be Exeter's P&R sites.

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The East Devon Local Plan should propose where these (new?) P&R sites will be in East Devon.

- I. There is a welcome commitment to “*Protecting transport sites and routes*” in the draft Local Plan. However, the cycle paths cited appear to be largely leisure routes. To deliver a modal shift away from private vehicles the Local Plan should enable a network of new, safe cycle paths that connect up settlements in East Devon to enable journeys for commuting, retail and education purposes. These cycle routes should follow Department for Transport design guidance and be designed for desired commuter levels (where 50% of journeys are by foot or bike).

This is especially important for the proposed new town. The proposed Infrastructure Delivery Plan (Para 5.8, #6) should give prominence to cycle, walking and bus connections to the new town, and the final choice of location should take into account the public transport options including access to train stations

The Local Plan would benefit from proposing adding a new commuting cycle route from Axminster to Seaton (the nearest station).

Furthermore, there appears to be an omission in Policy 66 (Protecting transport sites) where there is no commitment to improving existing or adding new train stations.

- J. The policy commitment to ‘20 minute neighbourhoods’ is welcome. The Local Plan would benefit from being more specific about the **criteria for defining a 20 minute neighbourhood** so that there can be objective measures to assess whether new developments meet this goal.

## Detailed comments

We list below some detailed comments on the Local Plan for your consideration:

1. Para 2.5 Objective 9 “*To prioritise walking, cycling and public transport and make provision for charging electric vehicles*”. The Local Plan would benefit from a commitment to ensuring new developments are mandated to provide not just charging for electric cars but also secure and under-cover charging points (especially in multiple-occupancy dwellings) for electric bikes (not all electric bike batteries are removable).
2. We note Policy 47 refers to car and cycle parking. The Local Plan would be improved by mandating specific standards for the design or and quantity of cycle parking places, in public places, for commercial buildings and in residential dwellings. These should at minimum align with design and quantity standards set out in [LTN 1/20](#).
3. Policy 65 Strategic Policy “*Walking and cycling links should be prioritised in new development*” would benefit from being more specific and firmer. For example, it should include things like:

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- a. Walking and cycling paths will have priority across all side roads in new developments, and signalled crossings of major routes will be of single phase.
  - b. 20 mph speed limit will be the default design (both with signage and road layout) in all new developments.
  - c. Cycle parking shall be designed to be more conveniently located than car parking in residential, retail and educational developments, and should allow for the charging of e-bikes.
  - d. Cycle parking numbers will meet or exceed LTN 1/20-specified numbers
  - e. Cycle parking design will meet LTN 1/20 standards (e.g. will accommodate non-standard bike forms, be secure, be sheltered, be of Sheffield-stand design)
  - f. To meet the policy statement that walking and cycling links should be “coherent, direct, safe, comfortable and attractive”. It should be a requirement for all new developments that they are connected up to the cycle network.
  - g. Permeability of developments should be higher for those on foot or travelling by bicycle, and this permeability should be maintained across independent developments. For example, in Cranbrook there have been issues where obvious links to networks etc are outside of the planning boundary, so it's too late or difficult to make links better into the development.
  - h. For commercial and employment developments, cycle access and parking as well as showers, lockers should form part of the application to enable those arriving by bicycle to do so safely and conveniently.
4. Policy 67 ‘Travel Plans, Transport Statements, Transport Assessments’ states that *“Where development schemes generate substantive additional vehicle movements...planning permissions will not be granted....unless a Transport Assessment and Travel Plan identifies measures to secure new sustainable travel arrangements”*.

We have concerns about the efficacy of this proposal. Our assessment is that Travel Plans and Assessments in new housing developments are often ineffective at nudging people away from using their private vehicle for all journeys, however short.

5. 68. Policy – Parking standards. This parking policy needs to be strengthened for cycle parking standards. The Local Plan should commit to the national guidance minimum cycle parking numbers laid out in LTN 1/20 of one cycle parking space **per bedroom** rather than the proposed ‘per dwelling’. The local plan should mandate that this cycle parking must meet LTN1/20 standards for design, convenience and minimum numbers.
6. The Local Plan would be improved with the addition of a planning policy which mandates that active travel infrastructure and public transport is in place and roads are adopted by DCC *before* houses are occupied so that bad driving/parking habits do not develop.
7. Work Hubs: The Devon Climate Emergency Response Groups ‘Carbon Plan’ referred to ‘work hubs’ as one means of reducing the need to travel. The Local Plan should align with this and commit to work hubs as one means of decarbonising transport.

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8. Working with the Highway Authority: some of East Devon's vision and objectives can only be delivered by working closely with Devon County Council. The draft Local Plan would benefit from a commitment which echoes Exeter City Council's Local Plan that "*The ... Council is working with partners including Devon County Council as the Local Transport Authority to ensure we have consistent aspirations and approaches*".
9. 3.7 "*Despite being a Main Centre, Cranbrook is not addressed in this local plan*" Given the impact that Cranbrook has had on the local area and the increase in commuting traffic on the B3174 it would be important to (a) take lessons learnt from the development of Cranbrook for the new town, and (b) to ensure close alignment between this plan and the Cranbrook plan, adjusting the latter in preference.
10. Policy 107 - Community Facilities - we would like to see that existing facilities are also improved as part of this plan in ensuring accessibility by sustainable modes of transport
11. Policy 101 - Recreational Facilities in the Countryside - we would like to see that for developments falling under this policy provision is made for visitors arriving by bicycle.
12. Policy 70 - Safe vehicular access to sites. This policy should explicitly include the need to ensure safe access for electric and human-powered vehicles. This is the future that we need to be building.
13. Policy 57 - Town Centre development. This policy should explicitly mention the need to enable cycling as a means of transport, with prominence given to properly-designed and located cycle parking. Towns like Honiton and Axminster currently have very few Sheffield cycle parking stands and these are often inconveniently located.
14. Policy 56 - "...should be accessible by public transport, bicycle and foot and well-connected to the centre *by these modes*" (addition in italics). Currently this doesn't actually say that they should be well-connected to the centre by public transport, bicycle and foot. They can be accessible from some other point by all those things, but not necessarily the centre, so this should be explicitly stated.
15. Policy 16.e - Given the major target of creating 80km of traffic free trails and quiet ways, we would like to see this rephrased as "Creating cycling and walking opportunities..."
16. Policy 13 - Exeter Airport. The airport would benefit from dry, secure and bookable cycle storage facility to allow travellers to do at least the local parts of their journey by bike.
17. Policy 12 - Employment Land north of Sowton. Access by Sowton Lodge and J29 would benefit from improvement.

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18. Policy 8 - Given the proximity of the proposed new development to Exeter it is imperative that good quality pedestrian and cycle links into the city are mandated.
  
19. Policy 1 Spatial Strategy: The draft Local Plan underlines the logic of continuing development on the west side of the district to make use of the strong functional links between the west of the district and Exeter. To make this a success it is important to ensure there are genuinely sustainable travel choices for travelling into Exeter. The Exeter Transport Strategy acknowledges that Exeter's roads have no more capacity for cars, it is one of the most congested cities in the country. The Local Plan must prioritise alternative travel modes to private cars for these developments in the west of the district.
  
20. Policy 4: Employment Provision and distribution places priority on the west side of the district. This development of employment locations must be accompanied by provision of active and public travel so that the private car is not baked in as the only means of travel to these employment sites.



Robert Dunne, Mike Walton: on behalf of the Exeter Cycling Campaign