

Richard Short
Head of City Development
Exeter City Council
Civic Centre
Paris Street
Exeter, EX1 1JN

3rd December 2015

Dear Mr Short

**Re: Outline Planning Application, 15/0791/01
Development of Bus & Coach Station Site.**

Following the submission of additional information by the applicants relating to traffic management resulting from this application, Exeter Civic Society would like to make additional representation which I hope you will take into account in writing your recommendations to committee, and they will consider in their deliberations and decision making at committee.

I must reaffirm that the Society is in favour of the development of the bus station as it is currently an eye-sore and an under-utilised city centre site. We understand that development can generate benefits for the city, that there is a loose development strategy being followed to provide leisure activities in the city centre, linked to, and easily accessible from the heart of the city centre.

This has been recognised in City Council and County Council policy/strategy statements for some time, and those policy/strategy statements have said, very explicitly, that for the bus station site provides a once-in-a-lifetime opportunity for a "step change in the quality, capacity, and environmental performance of public transport, especially between the City Centre and the proposed developments adjoining the City" (a quote from Policy CP9 of the Core Strategy, 2012).

The Exeter Growth Bus Strategy, 2012, subtitled "Accommodating Growth", provided a comprehensive and detailed description of how bus services should be improved and expanded. Notably the strategy focuses on the details of route and service frequency improvements, including new Park & Ride sites and services, but does not talk about the need for bus station facilities in the City centre.

The encouragement of public transport in the City is fundamental, not only for the development of an effective and attractive transport system which also includes linked encouragement of walking and cycling, but also for direct benefits for air quality and the wider and fundamental issues of sustainability of our way of life. Easy and attractive access to the City centre by bus is a key issue in encouraging people to use buses, and the bus station development proposal focuses discussion on how much a comprehensive, well-

organised bus station in the centre of the City can provide a welcoming gateway to the City for local and longer distance travellers.

This proposed scheme is a once-in-a-lifetime opportunity to realise these benefits, and the proposed scheme does not appear to meet these aspirations, nor even suggest that they have been weighed as valuable in the process. There is a strong impression that an appropriately sized bus station has been given a low priority in the development proposal, with favour given to retail floor space and an ever growing leisure pool complex. This is not at all in accordance with the planning aspirations and Design Principles for the site.

The Civic Society thinks that the following points are the key issues which have not been adequately addressed by the applicants in their latest submission:

- (1) Traffic management arrangements. The specific concerns are:
 - (i) Closure of Paris Street to all vehicles.
 - (ii) Adequacy of diversion routes for vehicular traffic, and associated measures of road closures, one-way streets, banned turns.
 - (iii) Associated issues of pedestrian and cycle routeing, and road safety.
 - (iv) Standards and quality of public realm.

- (2) Bus station and bus service facilities. There are a number of specific concerns:
 - (i) The reduction in size of the bus station from the current 15 active bay stops with 8 additional spaces for bus parking, to 12 bay stops and 6 stands.
 - (ii) Associated issues of people queuing on the streets, additional bus stops on-street, the clutter this will cause in the area, and routing of bus services.
 - (iii) The provision for Park & Ride services to u-turn at the junction of Paris Street with Southernhay East,

I have scrutinised the applicants Statement of Community Involvement (SCI), and I am disappointed that none of the concerns raised as a result of their consultation event in November 2014 have resulted in any changes or adjustments to the proposals. I wonder what the point of such an event was if it has resulted in local people's views being ignored. Many of the concerns raised related the size of the bus station and the impact of closing Paris Street to through traffic, the issues that the society and others still feel the need to object to. I am also disappointed that the city council has not issued specific written guidance to the applicants regarding the extent of consultation required, as required by your own SPD for community engagement. I have been advised by your planning officer that 'we provided a list of consultees', which I believe endorses the tokenistic nature of public consultation for this major development.

Closure of Paris Street to all vehicles

We understand the contribution that closure of Paris Street can make to the public realm, but this should not be to the detriment of other parts of the city, or communities living elsewhere. Our main concern is with the adequacy of the alternative routes for vehicular traffic, and associated measures of road closures, one-way streets, and banned turns.

We think that the proposed traffic diversion route - which is very explicit - raises complex traffic management issues, the impacts of which have not yet been fully addressed by the applicants. There will be qualitative impacts on the public realm, the sense of place, and also of the enjoyment and safety of movement around the wider city centre, including the traffic diversion routes which cannot be assessed simply in terms of traffic capacity. There are questions of how to enhance and ensure an attractive public realm and town centre environment for town centre users (tourists and visitors, employees, residents), who predominantly will be pedestrians (and cyclists). There are also issues of robustness of the arrangement, and a lack of alternative routes and responses to traffic congestion which risks creating occasions of serious gridlock.

Our members have observed that on many recent weekends traffic has queued from the John Lewis car park into York Road, preventing through traffic progressing onwards. The proposals to make King William Street one-way with a dedicated lane for the car park will not mitigate this problem because the queue will still extend to York Road at times. The bottle neck is the narrowness of York Road which will not allow through traffic to pass queuing traffic. The highway authority / applicant assumes that 15% of traffic currently using Paris Street will divert to this route, which can only make this situation worse at peak times. On the basis that the applicant has not demonstrated that they can mitigate the congestion caused by traffic queuing in this area, the alternative highways route should be rejected by councillors and residents of the city.

The applicants assert that 85% of traffic using Paris Street will divert via Exe bridges to head northwards. Whilst this alternative route may function adequately during most daytime hours, regular users of roads in the city centre will know that at peak time's traffic heading towards Exe bridges from the Paris Street roundabout experiences queues which extend towards Blackboy Road and into Heavitree Road. Any additional traffic will add significantly to this congestion.

We believe that the council will be displaying gross negligence if they approve a scheme where they know that congestion will be made worse as a consequence of it. The applicants should be asked to undertake highway improvements over a wider area to support the wider dispersion of traffic which they suggest may happen.

I am also concerned that both the County Council and City Council are making decisions about road closures and changes to the highways without a critical piece of evidence from the developer, that is a Stage 1 Road Safety Audit. This should demonstrate dangers relating to the P&R bus u-turning, any envisaged additional on-street bus stop provisions, access arrangements in general, pedestrianisation of Paris Street, and the diversion traffic management arrangements. It is now usual for this to be required at the Outline Application stage, precisely because the Audits may identify problems which bear upon the basic viability of the proposals.

Size of the bus station facilities

The number of active bus stops will be reduced from 15 to 12. But our own observations of the bus station on Friday 27th November and Saturday 28th November, during the busiest times of the afternoons around 5 - 6pm, showed the existing 15 stops typically occupied by 12 or more buses, and at times fully occupied, with even more buses entering the bus station. This suggests that even the existing provision of 15 stops is barely able to cope with existing demands. Our simple observation of the bus station shows that 12 bays will be inadequate to provide for even current levels of traffic.

The substantial areas of residential expansion in Exeter's hinterland will generate additional trips to the City Centre in the future, and these trips will add to road traffic and parking volumes, unless public transport, cycling, and walking options to and from the city centre are made more attractive and accessible. An increase in bus volumes and passenger numbers seems inevitable, but development proposals ignore the need to provide additional facilities, and it is disappointing that the highways authority has not planned for this.

We understand that the requirement for 12 bays came out of work by the City Council, the County Council, and Stagecoach, was set in the brief to the developers for the scheme. However, we have concerns that Stagecoach would prefer to use on-street stops because using a bus station adds to their overheads. They are not therefore a good partner for the design process. However, for bus users, a covered environment, information and ticketing facilities, and provision for interchange are an important part of efficient travel.

It is apparent that the decision by the City Council, the County Council and Stagecoach to propose 12 stops was made by compromising – and failing to meet the following:

- not meeting aspirations, policies, and strategies set out very clearly in City and County Council policy documents,
- for provision of bus stops and stands to be maintained on-site,
- use a once-in-a-lifetime opportunity for a 'step change in the quality, capacity, and environmental performance of public transport, especially between the City Centre and the proposed developments adjoining the City'.

Provision for Park & Ride services

The proposal for Park & Ride services to u-turn at the junction of Paris Street with Southernhay East will place that movement in direct conflict with movement - and queues - of cars into and out of the Princesshay car parks and Dix's Field. The Civic Society thinks that this proposal is worryingly ill-considered and potentially very problematic for those frequent times of cars queuing to get into the Princesshay car parks, resulting in congestion onto Western Way and Heavitree Road. The highways authority made it clear in their report dated 25 November 2015 to their Development Management Committee that this has not been satisfactorily resolved with the applicants (paragraph 4.12). What are the implications if this cannot be resolved satisfactorily?

Provisions for drop-off, pick-up, and long-duration parking of tourist coaches

Tourists are becoming an extremely important aspect of Exeter's economy, and tourist coach facilities for drop-off, pick-up, and standing/parking - must be located conveniently in the city centre. Currently facilities in the bus station for tourist coaches will be lost, but there appears to be a lack of coordinated proposals for convenient coach parking in the city. Failure to do so will be a significant lost opportunity for Exeter's tourist business.

In conclusion:

The society objects to the closure of Paris Street and the alternative highway arrangements because the alternative routes do not adequately mitigate the impact of the proposals.

The society objects to the provision of on-street bus stops because we believe an appropriately sized bus station should be a priority for Exeter and its size should not be determined as a result of what is affordable or the land available after all other matters have been considered.

Yours sincerely



Keith Lewis
Chairman
Exeter Civic Society

Cc Cllr. Peter Edwards, Cllr Rosie Denham