

Karime Hassan
Chief Executive
Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN

14th September 2015

Dear Mr Hassan

Re: Development of Bus & Coach Station Site

Following the submission of the outline planning application for the redevelopment of this site, I am writing to express the Civic Society's concerns about the impact of this development upon the city centre, and the area adjoining it. This is a very significant proposal because of the possible changes to the highway network, more so than Princesshay, which only affected minor roads. I would be grateful if you could reply to the questions within this letter.

I am writing to you as chief executive because this application fails to address all of the aspirations in the Bus and Coach Station Development Principles, and the Society would like to know the Council's views about future development of this area. I have sent a separate version of this letter to Richard Short as a response to the planning application, and to Dave Black at the County Council.

The Civic Society held a members discussion meeting on 1st September 2015 to debate the details and merits of this application, and its impact upon the city centre, and had the benefit of an independent highway consultant giving advice about the County Council's approach to highway and transport planning. This followed detailed consideration of the application by our planning sub-committee (and their letter of representation to the Planning Department), and our meeting with Crown Estate and representatives of their design team on 26 August.

This response is made in the context of the Bus & Coach Station Development Principles; the Core Strategy; The Grecian Quarter Heights Constraints Analysis; the Exeter Bus Station Redevelopment Traffic Analysis Report; and the Bus Station: Infrastructure Option Assessment, Exeter City Centre Transport Study; all of which are quoted by the developer in their Design & Access Statement and the Transport Assessment.

The majority of members attending our discussion meeting are against the closure of Paris Street to traffic. They are concerned about the impact of diverting traffic away from this arterial route through the city centre, and onto roads that were not designed for this function. And we are also concerned that local traffic will start to use routes further afield, such as Union Road and Prince of Wales Road, both of which have carriageways that are not wide enough for two vehicles to pass comfortably at 30 mph along several parts of their length. We believe that Paris Street is not a difficult road to cross, and with some additional

traffic management strategies it could be made safer, particularly if park & ride buses were removed from the upper part of Paris Street. It should be possible to prevent traffic turning right into Sidwell Street (except buses), and this may result in a reduction in traffic using Paris Street because it will find alternative routes.

The Development Principles cover the area enclosed by Sidwell Street, Summerland Street, Western Way, and Paris Street and talks about making it easier to walk around this area, more permeable access from Sidwell Street, and for the provision of active frontages. It also supports improvements for the Sidwell Street market and the improvement of shops in Sidwell Street. Whilst it is clear that the applicants are now only likely to develop as far as Cheeke Street, it is my understanding that the former bus depot in Belgrade Road has been sold to a developer other than the applicants, and that when Stagecoach relocate to their new depot at Marsh Barton, that this site will come forward for development. It can only be hoped that buildings fronting Sidwell Street, and the block bounded by Sidwell Street, Summerland Street, Bampfylde Street and Cheeke Street will be developed in future years in accordance with the Development Principles, which the Society would very much like to see. Do you agree that the Development Principles still apply to the whole of their defined area?

In considering whether this planning application complies with Development Principles we would make the following comments:

Principles A & B do appear to be largely met at this planning stage, but there is no mention of the future of the street market, or inclusion of residential development to help rejuvenate the city centre. What plans does the City Council have for the development of the Sidwell Street market? Will you expect residential development to upper floors in future phases of development?

Principle C is a critical element for the city as it is a significant gateway for daily commuters and visitors. This principle states "A new bus and coach station can help increase public transport use for journeys into the city centre, including for those transferring between modes/ And further goes on to say that 'a specification will be agreed with the City Council, County Council, and bus operators'. The Transport Assessment states that the 12 stands proposed for the new bus station have been agreed with Stagecoach, but says nothing of ECC or DCC involvement. The current bus station has 15 stands and 8 spaces for buses to park, so the new station is considerably reduced in size for a city that is expanding! Is ECC happy with the capacity of the bus station, and has the council had an input into the size and specification? Will ECC own the bus station upon completion of the development? The Transport Assessment seems to base usage upon current patronage rather than allowing for any increase in population for the city and its hinterland. It also fails to include DCCs aspirations to increase travel by public transport as set out in the Local Transport Plan 3, which is evidently necessary to reduce peak-time congestion and reduce exhaust fumes. Do you believe the size of the bus station is future-proofed to cope with increased patronage as set out in LTP3 and population growth over the next 50 years? We also have concerns that the layout of the bus station and neighbouring streets do not provide good connectivity for onward journeys, with no provision for drop-off and pick-up of passengers by private car or

taxi, and limited access to local bus services, unless a high quality pedestrian route is provided along Cheeke Street to Sidwell Street connecting directly to the station passenger area. This is important if the city wants an integrated transport system. Do you agree with the principle of having an integrated transport system for the city?

Principle D says 'development should complement Sidwell Street, High Street and Princesshay, positively support the role and function of Sidwell Street, including the opportunity for a street market'. Whilst the corner of Paris Street/ Sidwell Street will be improved, these proposals do nothing to support or improve the role of Sidwell Street or its street market. If development included enhancements to Sidwell Street along its length from Paris Street to Cheeke Street, including the street market, then this principle could be met. Removal of some or all private cars in Sidwell Street would be a positive change in our opinion, as long as shops, businesses and the market can be serviced.

Principle E says 'Redevelopment of the bus station area should take the opportunity to reflect the street pattern of the wider city centre. New side streets, free from general vehicular traffic, should be introduced linking Sidwell Street to Paris Street to the heart of the new development.....' Principle G says 'Linkages between the site, including the bus station, and its surroundings, including Sidwell Street, Princesshay, High Street, and neighbouring residential areas must be designed into any development. However, this reduced scheme maintains traffic on most of the existing roads, except for the loss of Bampfylde Street and Bude Street. And it proposes to increase the flow of traffic on Belgrave Road by making it a primary route. In addition, the development does not provide any additional permeability from Sidwell Street, in fact it makes it worse by blocking pedestrian access to the development from Bampfylde Street. We suggest that a pedestrian route is established from the new shopping street to the rear of the Co-Op building to provide better access from Sidwell Street, and giving an exit from the station onto Bampfylde Street. The desired permeability from Sidwell Street is of course restricted by the development of a service yard. Do you believe the proposals provide adequate permeability from Sidwell Street and towards Summerland Street and Newtown? Principle G calls for public open spaces to be linked and that the pattern of spaces should be extended through the new development. Whilst the proposal creates one new space, the amphitheatre, do you think that a quieter Sidwell Street with its wide pavement could also become a public space for an improved street market and events in the evening? This approach could stretch the High Street activity, especially in the evenings.

Principle I calls for traffic to be able to park as soon as possible when travelling to the site, service yards screened, and conflicts between pedestrians and road traffic should be reduced as far as is practically possible. We hope removal of car parking at the development will be positive, although it must be noted that at busy times of the year most central car parks are full, resulting in traffic queuing on streets and restricting the flow of through traffic. Traffic counts were not taken at such busy times, and we do not believe the traffic assessment has demonstrated how car park queuing will be restricted to allow the flow of through traffic. Will you ensure that all highway proposals have strategies to allow the flow of traffic on primary routes?

We also make the following specific observations regarding the proposed development:

- It is proposed to use materials similar to those used in the Princesshay development, but the Design Principles call for the development to have its own identity. This should become clearer when details of buildings emerge in the reserved matters planning application, but we would request that the colour palette has a resemblance to the Grecian quarter rather than Princesshay.
- The Design & Access statement proposes that there may be public art, but that this will be subject to control by the developer. Public Art on streets should be subject to proposals by the council and the public, with an expectation of approval by the developer. Is it possible to impose a requirement for the provision of public art in and around the development (perhaps an agreed expenditure)?
- It is not clear whether the service yard between the new buildings and the back of Sidwell Street shops will be shielded from public view, although screening is part of the Design Principles. It is also not clear how service vehicles will access this area, with one proposal showing vehicles travelling up Cheeke Street even though another proposal says this will be for buses and cyclists only.

Transport Implications

The application includes proposals to have bus 'layover' stops and bus stops positioned on neighbouring roads of Bampfylde Street, Belgrave Road, and Summerland Street, which may be acceptable if pavements are wide enough for bus shelters and people queuing. It should be remembered that the Design Principles for this area includes a requirement for active frontages onto these streets as part of any future development. We are concerned that the level of activity associated with National Express coaches involves the loading and unloading of luggage, and buses leaving from early in the morning to late at night. This activity may be acceptable on minor roads with bus shelters, but is not suitable for busier roads such as Belgrave Road and Summerland Street which are proposed to be an arterial route if Paris Street is closed. Passengers need a reasonably comfortable, well lit, enclosed waiting space because people sometimes need to wait for hours (especially when coaches are delayed), and this can be late at night. As with the bus station itself, we don't want a facility meaner and less adequate than we have already. There needs to be dropoff capability at all times.

It is proposed that the length of Cheeke Street between Bampfylde Street and Belgrave Road is for buses and cyclists only, this seems OK. But we believe higher priority should be given for pedestrians and cyclists to cross Cheeke Street to help improve access to and from Bampfylde Street and Belgrave Road and to meet the Development Principles criteria.

It may also be desirable to make adjustments to bus stops in Sidwell Street so that buses stop closer to the Cheeke Street junction to facilitate access to and from the bus station for those city centre routes that do not use Cheeke Street.

Proposals to locate the existing Park & Ride buses to the lower part of Paris Street could be successful as long as pavements are wide enough for shelters as well as pedestrians. Although the County Council has plans for two new Park & Ride services from Ide and

Cowley Bridge there is no indication in the application if there will be capacity for these services in this locality, so it is essential that there should be capacity for additional services.

In paragraph 5.2.4 of the Framework Travel Plan the applicant states that they are only proposing a 10% increase above provision in the Princesshay development, and that they do not intend to meet council policy in regard to recommended cycle provision. The County Council has plans in its Local Transport Plan 3 to increase cycling rates from 6% to 20% (240% increase) by 2026, but this aspiration is not reflected in this application. There should be a greater allowance for cycle stands, even if provided on neighbouring streets.

We are not in favour of losing public car parking in Parr Street car park for coach parking. Is this appropriate, and will parking spaces be lost to local people?

Highway and Traffic Changes

If this application is approved and Paris Street is closed, the Society is concerned that the impact on the alternative route will be adverse to those choosing to drive across the city, and if drivers choose to find alternative routes to avoid the city centre, such as Union Road, this could lead to congestion on roads that are not wide enough for two-way traffic.

We offer the following observations upon the proposed alternative route should this application be approved:-

The route from Western Way roundabout via Belgrave Road towards York Road junction seems OK, although the access and egress arrangements to the NCP car park should be reversed to support any queuing to enter, and avoiding cross-over when exiting.

Preventing traffic from turning into Summerland Street from Western Way seems OK, but we are not sure that the proposed pedestrian crossings on this junction are good for pedestrians or cyclists. The proposed arrangement appears to require pedestrians and cyclists to share the same route. A junction similar to the Western Way/Barnfield Road junction may be better, and is similar to the existing junction for cyclists and pedestrians. Summerland Street should be designed to enable cyclists to progress to Sidwell Street on a dedicated cycle lane without obstruction by coach parking.

We are unsure how traffic driving up York Road will access Sidwell Street as both Bampfylde Street and Belgrade Road will not afford entry from Summerland Street. Is a right turn from York Road necessary?

With King William Street becoming one-way it is possible that traffic will flow well to Longbrook Street, although it was noted that around New Year 2014 that traffic for the John Lewis car park queued back onto York Road, causing grid-lock in the area; this cannot be allowed to happen. Are you happy that measures are proposed to ensure that this will not happen? In addition, King William Street gives access to service yards behind Sidwell Street shops and John Lewis, both of which are unattractive for a primary traffic route. Should the

developer do something to enclose these areas so this route is more attractive? The proposal for the junction of King William Street and Longbrook Street does not give priority to through traffic to New North Road- this should be changed. This could mean making part of Longbrook Street one-way heading north, or revised junction priorities.

Proposals for routing buses to and from the High Street (or London Inn Square) from New North Road seem OK with widening and re-alignment of this recently altered street (will this be at developer's expense?). We hope that the London Inn Square junction will be developed without any form of traffic control (as High Street and Queen Street junction), giving pedestrian's priority, and expecting bus drivers, taxis, and delivery vehicles to take responsibility for adjusting speed accordingly.

With no cars now using the lower part of Sidwell Street we hope that this will be a safer area for pedestrians, and act as a natural extension of the High Street to Cheeke Street. As stated before, adjustments to bus stops in the area may also be desirable as a result of these changes. There is also an opportunity to remove traffic lights from the Cheeke Street / Sidwell Street junction because there should be no cars travelling up Sidwell, and those with access to this part of the street should be expected to give priority to pedestrians, and other road users in accordance with road markings and the Highway Code,

And on a minor point, the name for new street in the development is suggested as Bampfylde Street West in the planning application, which we are not sure, is appropriate. Before this area was destroyed in the Second World War it consisted of many streets and names which have long been forgotten, so resurrecting one of these would be good. Whilst it is true that the west end of Bampfylde Street will be lost, the east end is retained. Is it for the developer or the City Council to determine street names?

I would be grateful if you can reply in the next few weeks and before this application is considered by the Council.

Yours sincerely



Keith Lewis
Chairman
Exeter Civic Society

cc: Councillors of Executive Committee and Planning Committee