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13 March 2017

Keith Lewis
Exeter Civic Society

By Email

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Dear Mr Lewis

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Subject: NATTRAN/SW/S249/2636 - PROPOSED EXTINGUISHMENT OF VEHICULAR RIGHTS AT PARIS STREET, EXETER, EX1 2JB

Further to your letter to the DfT objecting to the proposed extinguishment of vehicular rights under the draft order as advertised, I seek to address your concerns as set out below. I have also set out the benefits of the proposals insofar as they are directly linked with the Draft Order and the proposed redevelopment of the Bus Station and surrounding area.

Exeter is a growing City, and has been for a number of years, during which time the size of the city centre retail area has remained fairly static. The City not only needs to provide for its own increasing population, but is a focus for development in the surrounding Districts, as evidenced by the growth of Cranbrook and Pinhoe in East Devon, and the South West Exeter development at Alphington in Teignbridge. The City must also provide for the needs of the surrounding area as a Regional centre and focus for employment and retail.

All of this pressure for retail and leisure needs on the City make the extension of the Primary Retail Area essential for the City to retain its functions to an appropriate, and improving, standard. The Council have considered the proposals very carefully before deciding to take the approach it has, and as with most decisions it is a balance of needs. Ultimately, the Council consider that it should protect the most vulnerable road users in pedestrians and cyclists, as well as bus users, ahead of the needs of private cars.

The Council has also considered the needs of local residents and businesses very carefully in coming to their position, and while there are changes in traffic routing and flow on various streets, the most vulnerable areas have been protected by physical measures. This is predicted to lead to a reduction in traffic at key locations, and focuses the impacts of increased traffic mainly onto roads which are non-residential, and benefit from significant highway width. This has not been possible in every location, but the sections of residential road directly affected are limited in length, and other measures have been put in place to reduce the impact of road traffic, especially that of large vehicles.

Addressing your concerns directly.

The Paris Street corridor is not the cross city corridor, that follows Western Way and Bonhay Road, and is the signed route. The route you describe is signed for car parks, and not for any through movement. I appreciate that drivers will make their own decisions about route choice, and navigation systems generally make no reference to signed routes, however, this is a key point to the use of the route and the changes implemented over the years.

The nature of the streets on the alternative route is exactly what makes them appropriate for the proposed use. The Manual for Street and Manual for Streets 2, jointly referred to as MfS, have at their core the concept of 'Place' and 'Movement' as a means of considering streets. Paris Street and New North Road past John Lewis are clearly 'Places' in terms of street classification. Cheeke Street,

Belgrave Road, Summerland Street and King William Street clearly have a 'Movement' function. The short section of York Road used is a mixed area as it is the service route for the north side of Sidwell street, but also has residential properties. However, the balance is heavily weighted towards the proposed route for cross centre and car park traffic rather than Paris Street, when we consider the nature of their use.

While Paris Street may have had a particular function years ago, it was at a time when the High Street and Sidwell Street held up to four lanes of traffic. There has to be movement with the times and the needs of the City to provide for an increasing resident, commuter and 'served' population, means that more space should be dedicated to pedestrians in the central area.

I am not aware that the County Council have stated as an Authority that the previous change was unacceptable. They raised concerns with the current proposals which were addressed following some additional work and scheme changes. The Council have had full sight of the highway proposals and the scheme has to be constructed in accordance with the approved drawings. The delegated powers to the Officers is to approve the S278 works, based on the drawings put in front of the Development Management Committee

One of the outcomes from the previous amendments to Paris Street traffic is that on both occasions between a 10% and 15% reduction in cross city traffic has occurred. This is based upon recorded traffic data, and was reported in the Transport Assessment submitted with the Outline application. This is a common traffic phenomenon, and results from a number of causes, including drivers not making 'trivial' trips and electing to use a car park on the same side of the city centre and walking a bit further, rather than driving to the closest car park to their destination. Consequently, these types of scheme frequently have positive traffic impacts, and the result is not just diversion to other routes.

Car parking is not being increased in the City Centre, a long term policy, and the County Council have sought to avoid growth in traffic within the City Centre, as a further long term policy approach. This has led to relatively static traffic flow levels within the City Centre, as part of the management of traffic, not just the provision of roadspace for traffic.

In respect of your comment regarding increase in use of minor roads, this was something raised by local residents during the consultations, in regard to their own behaviour. However, looking at the number of traffic movements using these streets, the impact does appear to be very limited. The risk of 'rat running' exists in any urban location and especially where there are delays to traffic. However, in the majority of cases the risk does not become a reality and the previous changes to through movement bear this out. Delays already exist for traffic in both directions along York Road, and yet the traffic seeking to travel to and from Union Road does not travel through the local streets in any perceptible number. That does not mean that it does not happen, or that it will not happen, and the County Council have secured a sum in the S106 Agreement of £500,000 to cover unacceptable impacts of the proposals, should any arise.

There are issues with peak period congestion in the city, but the Paris Street to New North Road section of the city is not of itself a principal cause of delay. When the cross city routes become busy and congested, the focus of the delay to northwest bound traffic is at Exe Bridges, and the Hele Road/New North Road traffic signals, linked to the roundabout at the Clock Tower.

Therefore, although the rerouted traffic will involve a slightly longer journey across the city centre, it will not add to overall journey times, and therefore congestion, at peak periods. There will also be other traffic benefits as the queues for the Princesshay Car parks and cross town traffic often conflict, which will no longer occur. This will reduce the risk of these queues extending back onto Paris Street roundabout, and the queues at the Jury's Inn Pelican Crossing will be less likely to queue back onto Paris Street roundabout, as traffic northbound along Western Way will be reduced. In addition, Emergency vehicles will not have to weave through queuing traffic, in particular along York Road.

We are not changing the routes for traffic travelling across the city from New North Road to Paris Street, but we will provide some benefits, not least the removal of buses from Longbrook Street and

York Road, by reintroducing the bus movement past John Lewis into Sidwell Street. The closure of York Road to traffic heading towards Longbrook Street beyond King William Street will reduce total traffic flows on the two main residential streets used, by up to 30% on York Road, past the School and Mosque, and up to 20% on Blackall Road.

Therefore, we are actually reducing traffic in the majority of the residential areas concerned, and removing bus and coach movements from these streets, in particular those introduced by the works undertaken for John Lewis. Specifically, the rerouted traffic does not run past the School, except for the York Road/King William Street corner, or the Mosque and Queens Crescent gardens.

There is capacity for the traffic to use the alternative route, and it will not travel through the junctions which currently experience capacity issues for vehicles travelling to the north and west of the city. At the Sidwell Street traffic signals with York Road, the traffic will balance existing traffic flows, making use of the green time already provided for movement between Summerland Street and York Road. Traffic will not travel through the York Road junction with Longbrook Street. The changes to traffic priority at the Belgrave Road junctions with Cheeke Street and Summerland Street, and York Road with King William Street will make the remainder of the route free flowing, with no need for vehicles to stop.

Traffic signals will be provided at the Longbrook Street junction with King William Street, and these will be linked in operation with the existing ones at New North Road, to make traffic progress through the junctions. This way the alternative route will function without increasing congestion on the local network.

That the route has been designed to be a free flowing as practical, is reflected in the Air Quality report provided in support of the Outline Bus Station application, which showed a benefit to Air Quality in Longbrook Street, York Road and Blackall Road, the principal residential streets affected by the John Lewis changes. This is due to the reductions in traffic mentioned, and the removal of buses from Longbrook Street and York Road, benefitting the Primary School, Mosque and Queen's Crescent Gardens.

The traffic priorities will be changed along the route to facilitate movement by vehicles, including the large vehicles that currently use (Iceland, Sainsbury's and John Lewis) and those that in the future would use the route. Reviewing the data from the Outline Planning Consent for the Bus Station reveals that in the AM peak currently there are 36 HGV movements on York Road towards Sidwell Street, and 5 HGV movements on York Road towards King William Street. In the PM peak, this is 29 movements and 5 movements respectively. The proposals would result in a change to 23 movements towards Sidwell Street, and 16 movements towards King William Street in the AM peak and 18 movements towards Sidwell Street, and 5 movements towards King William Street in the PM peak.

Therefore, in the AM peak the numbers would remain similar, but reduce past the School and Mosque, and in the PM peak would reduce significantly. These numbers include the two bus movements which currently travel from Sidwell Street to Longbrook Street via York Road in each peak period, but are likely to change route to run from Sidwell Street to Longbrook Street via New North Road in the future. These were left in place as Stagecoach have not decided upon the final routing as yet.

Consequently there would not be an increase in HGV movements on York Road at all, and where the increase in northwest bound movements occurs it is met by a reduction in the opposite direction of travel, at the widest point of York Road. Past the School, HGV movements decrease.

Therefore, we consider that the removal of traffic from Paris Street, will not result in a material increased risk of congestion or have an adverse impact upon the School or the wider St James area, and have remedied some of the issues raised by the John Lewis changes, especially in the removal of large vehicles from Longbrook Street and York Road. The proposals will also provide a benefit to Air Quality on Longbrook Street, York Road and Blackall Road, and are the appropriate way to address the future growth needs of the City.

I trust that this addresses any questions or concerns that you may have had, but please contact me should you have any further questions. All correspondence will be copied to the National Casework Team for their information.

Yours sincerely



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Technical Director

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