



Transport Planning,
Devon County Council,

By email
transportplanning@devon.gov.uk

30 November 2024

Dear Devon Transport Planning Team,

Exeter Civic Society would like to submit a response to the Draft LTP4, and we hope that you will find it helpful in making adjustments before the Plan progresses to the next stage.

We support the aims set out in the Introduction of this strategy (page 4) '*.....This transport strategy and plan for future investment aims to accomplish this by developing transport infrastructure that:*'

- *Unlocks development*
- *Maintains an efficient and reliable network*
- *Supports active travel*
- *Reduces the negative impacts of transport such as congestion and pollution.*

The Society is interested in both proposals for Exeter, and for its travel to work area, which the draft points out is one of the largest in England. And in paragraph 5.1 you show that the travel to work area increased in the years 2000 to 2020, demonstrating that even more workers are travelling to the city for work as a result of the number of jobs exceeding the number of Exeter residents to fill them. Conversely, there has been a loss of employment opportunities across the travel to work area of East Devon, Mid Devon, Teignbridge and the east of West Devon. Our understanding is that about 30,000 people commute to the city every day, mostly by single occupancy vehicle.

We wish that more employment opportunities will be established in up-coming Local Plans in these neighbouring council areas to reduce the need for people to travel to the City and for Exeter's increasing population to take up local jobs. But we recognise that this is beyond the remit of this Transport Plan.

In November we attended the Inspection of the Teignbridge Local Plan because of our concerns about development on the edge of Exeter to uphold our previously submitted concerns more about traffic entering the city, as well as the visual impact of development

upon the city. In reading supporting documents for the Teignbridge Plan submitted by yourselves and WSP we noted that part of the reason to encourage more Exonians to use active travel is to free up capacity for rural and incoming traffic. This is a flawed strategy and we expect that mitigation measures in this plan will be vigourously developed and managed to support inward commuters using public transport to travel into and out of the city, especially at peak times. We are further concerned about the modelling of future vehicular traffic into the city from development across Mid and East Devon, Teignbridge and Exeter which suggests that roads in the city will face an increase in traffic during peak times, and some roads and junctions will need to operate above 100% of capacity. Whilst we appreciate that this is a computerised model, we hope that this LTP will put in place measures that will not allow this to happen, including consideration of measures to prevent single occupancy cars entering the city at peak times. Furthermore, the modelling seemed to assume a continued migration into the city as a result of a growing population in the travel to work area, but we wonder where these additional people will be travelling to and where additional jobs will be found? If past assumptions are being used to plan for future traffic movements then we think that is a flawed model. Many offices and businesses in the city centre are being converted into residential use, co-living accommodation, and student accommodation, and there are few jobs being created apart from perhaps the retail and hospitality sector (so low paid); so should the modelling be reviewed and based on the likely number of jobs rather than past trends? It would be reasonable to expect that there will be more people and traffic in the city outside of peak times as people commute to the city to use supermarkets, and visit the growing retail and hospitality outlets.

We wonder what the impact of the combined authority will be on this transport plan, and others already adopted. This should be explained in the foreword of the next revision of the plan.

Below is our responses to the various elements of the Plan as set out in the on-line questionnaire:

6 "Transport will facilitate sustainable growth and support reaching net zero carbon by 2050 at the latest. Well-integrated, accessible and inclusive transport will improve travel choice and benefit the health and wellbeing of everyone."

We agree with this aspiration and hope that well-integrated public transport can be developed to improve travel choices but it must be very accessible. For those living in Exeter this is an option for many parts of the city, but more should be done for those areas where this is not the case. But to address congestion in Exeter, it is essential that in rural areas, and market towns, significant car parking is provided at stations and on bus routes, together with covered bus stops and travel information to encourage more people not to commute into the city via single occupancy cars. As for supporting growth areas close to

Exeter, public transport options must be put in place at a very early stages of development to give new home owners the option of not using their cars, and to support those who choose not to own a car. Car Clubs is also an essential option. In both cases, sustainable transport may need to be subsidised initially by the developer.

In respect of rail travel, we recognise that there has been a large increase in travel to Exeter by train in the past decade, and that the re-opened Okehampton line has been a great success. We support all proposals highlighted in paragraph 4.3 of LTP4, and particularly a desire for a 30 minute frequency for trains on the Waterloo line. However, whilst this is highlighted in the rail section as supporting travel from East Devon, the line does not support those towns on the south coast, so maybe the text needs to change to says 'parts of East Devon'?

Improved access to stations is clearly important, but some stations are not easily accessible such as St Thomas and Polsloe stations. The need to improve access here should be included in the Plan.

7.Decarbonisation: Reaching net zero by 2050 at the latest by reducing the need to travel, increasing digital access and shifting trips to sustainable transport and fuels.

If the County Council is serious about achieving net zero by 2050 this plan must include policies that make it more attractive to use public transport rather than just *encourage people* to leave their car at home. People with busy lives will simply take the easiest and quickest travel option – usually the car. It is disheartening to read that the citizens' assembly generally rejected challenging changes to reduce car use. This reinforces the need for this Plan to put in place high quality public transport options before enforcing or encouraging changes.

8.Reliable and Resilient: Protecting and enhancing the strategic road and rail links that connect Devon and Torbay to the rest of the country.

This is of course essential in linking our towns and to allow commercial traffic to move around the county.

We agree with the proposed joint working with National Highways to improve local resilience on the M5 between junctions 29 to 31. We have seen this route used more as a distributor road for people in the Exeter to travel from the east side of the city to the west because of the on-going congestion within Exeter. With significant development along the A379 between Matford and Peamore, including the development of new traffic light controlled junctions, this route is now less attractive for local people. We understand that the improved and widened Bridge Road is already operating close to capacity as is Countess Wear roundabout.

Can the M5 really be given greater capacity, or can the level of traffic along it really be managed or reduced? We have recently been made aware of a proposal that would have reduced traffic on the A379 but was blocked by National Highways. This is for the approved planning application for the employment site at Peamore which had a proposal to provide a slip road onto the A38 from the A379 heading eastwards, and we understand, supported by DCC. If National Highways' priority is the strategic road network without any consideration of the local road network, it is essential that policies within this plan actively and effectively reduce single occupancy car journeys at peak times into the city.

9.Easier Travel: Providing well-integrated, inclusive and reliable transport options for all residents and visitors in both rural and urban communities.

Essential, but as in 7 above, commuters must be given a good reason not to use their cars, and discouraged from driving.

10.Unlock Development: Supporting clean growth by providing new transport choices within and to new developments and using technology to improve existing infrastructure.

We agree. But all major residential development sites must be accompanied by employment land to give people opportunities to work locally, and shops and facilities to enable them to stay local rather than to travel. In addition, cycle routes and bus services must be provided very early in a development, and developers be mandated through planning conditions to get roads adopted early so that buses will be able to serve new residents. To achieve this the Highway Authority must make these demands at master plan or outline planning stages.

11.Greater Places for People: Enhancing the attractiveness of streets by reducing negative impacts from vehicles, regenerating the public realm, and facilitating safe active travel movements.

We have been previously informed by a senior highways officer that there is no funding to undertake improvements to pavements and streets within current budgets, unless paid for by development or others.

Whilst we agree that in Exeter this is very desirable, we believe that this is an aspiration that needs a detailed perspective/plan to be delivered, due to the current lack of residents' support and a lack of funding. Due to the cuts in DCC funding the Highway Authority is currently unable to undertake the basics such as clearing our highways of debris or weeds, or to regularly clear gulleys to prevent flooding. And you have failed in instigating the Heavitree LTN, so LPT4 must outline what needs to be put in place to achieve a better outcome with other such schemes. Instead of isolated single measures there is a need for integrated planning which was seemingly lacking with the Heavitree & Whipton LTN. If the said LTN would have been instigated, our understanding is that there were no funds to

enhance the attractiveness of streets by improving pavements and crossing points to make walking and cycling more attractive.

Such improvements will be easiest where nearby development is asked to make such enhancements, and that those are only likely when improvements have been identified in this Plan, the Exeter Transport Plan, and the LCWIP. We do not believe that any such 'enhancing the attractiveness of streets' and 'regenerating the public realm' is a part of these plans.

12. *The Place to be Naturally Active: Expanding the multi-use trail network, delivering a network of quieter lanes and improving facilities and safety in urban areas to enable people to be more active and experience our outstanding natural environment.*

We agree with this, but to maintain the attractiveness and safety of these routes the Highway Authority must at the same time invest in the maintenance of these routes. As an example of where this has not happened, the pedestrianised section of Pinn Lane, south of Tithebarn Way has debris from trees, collapsing banks, litter and other detriouitrus which makes it unattractive and unsafe.

13. Which of the objectives is the most important to you? Decarbonisation; Reliable and Resilient; Easier Travel; Unlock Development; Greater Places for People; The Place to be Naturally Active;

We would like to see public transport and non-car use prioritised through having a network that is **Reliable and Resilient** that supports **Easier Travel (non-car use)**.

14. Do you have any other comments about the Vision and Objectives of the new Local Transport Plan?

We provide these views elsewhere in this response

20. Do you have any other comments about the strategy for Exeter in the Local Transport Plan?

Should there be any new strategy for Exeter included in this Plan when the city already has its own Transport Strategy document. Having two different strategies will be confusing. Should this strategy just state the background to the current situation (which will be different to the Exeter strategy because it was published a few years ago) and defer all development to that transport strategy? Whilst it will be interesting for you to receive comments from non-Exonians, It would be better to have a review of the Exeter Transport Strategy shortly if this consultation and update the Exeter Strategy.

The description of Exeter on page 7 is an accurate reflection of the city but it fails to recognise that the city's congestion is largely as a result of the 30,000 out of area commuters at peak times travelling in and out of the city. **This problem must be both recognised in the plan and addressed if the city is to be free from congestion.**

In paragraph 5.1 you show that the travel to work area increased in the years 2000 to 2020, demonstrating that even more workers are travelling to the city for work as a result of the number of jobs exceeding the number of Exeter residents to fill them. However, the number of jobs in the city is probably finite, the city's population is increasing, and more jobs are likely to be filled by local people, which may change the dynamics for rural commuters, particularly lower paid workers.

The growth of employment sites at the Science Park, Skypark, Hill Barton and Greendale seems to have resulted in a significant number of people commuting out of the city for work at Peak times. The impact of this can be seen in particular in the evening peak travel period with workers returning to the city, and growing congestion at the Clyst St Mary roundabout. The Plan should recognise this change in travel patterns.

The supporting evidence in this draft makes it clear that a high percentage of Exonians already use active travel to move around the city, with a current strategy in the Exeter Transport Plan and Exeter LCWIP to get that level to 50% - which will be one of the highest in the country. There will of course be a reasonable number of vehicle journeys across the city, including at peak times, that are made by trades people for whom their vehicle is essential. And another group of drivers for whom a car is essential for work, and for taking children to school on their way to work, and subsequently collecting them from school.

The Plan highlights the success of the Magdalen Road one-way traffic changes on page 21, and our experience of the completed changes are a better environment with fewer cars and therefore pollution. The case study fails to reflect the problem the displaced traffic has had on other roads and to point out that transport across a wider area needs to be addressed when such schemes are planned. The Magdalen Road scheme was only achieved with government funding to improve a cycle route through the area, and took much officer time in consultations – is it possible to replicate this elsewhere, and if so, should these pre-conditions and outcomes not be more clearly outlined?

Whilst we agree with improving travel arrangements in the city with improved bus services, there is a limit to how many buses can be economically employed at peak times and then be economically viable throughout the day. This is a critical piece of understanding that is necessary to ensure that any bus improvement plan is possible and viable. Paragraphs 5.4 and 5.5 recognises the challenges of improving bus services both in/out of the city and within it, due to the narrowness of some roads, and the restrictions of junction 30. The hope of providing more bus priority along Cowick Street and Honiton Road have been recently

dashed by objections, so some of the wished for improvements need to be updated in the plan.

In respect of greater train use, there are some successes, particularly the Okehampton line, but with limited new rolling stock, and a lack of passing bays, there is limited scope to make a significant change to passenger numbers without significant government funding. A significant increase in car parking spaces near rural stations is needed, or indeed a local P&R service to regional stations to support more patronage, alongside the much vaunted, but undelivered, through ticketing.

P&R can be a success but should take place further from the city's borders to reduce congestion and growing capacity issues on the city's peripheral roads. If the expectation of 15 minute journeys from market towns can be delivered, the placing of a number of P&R facilities on rural bus routes would be beneficial by increasing passenger numbers, and maybe easier to deliver if they are in rural areas and smaller than the large P&R sites in Exeter. And if they can be located adjacent to rural public houses or shops, users will have the benefit of facilities such as toilets and drinks/food.

We also see it as necessary to discuss the development of Park & Ride facilities at traffic-hubs, which enable the interchange between all modes of traffic, including lockable safe bike and scooter storage and recharging, car- and cycle-club spaces.

In paragraph 5.6 there are some good ideas for Decarbonisation, but what follows lacks any actual projects to deliver such changes. And improved pedestrianisation in the city centre is welcome but we wonder where funding will come from. There has been the possibility of introducing a cycle lane on Summerland Street between Western Way and Sidwell Street for some time, but recent strategy has introduced on-street bus and car parking which prevents such cycle routes.

Finally, we welcome the search for a new car and cycle club provider, and hope to see the dedicated stations across the city repopulated with vehicles for hire again.

22.Would you like to comment on the strategy for Growth Areas?

We will not comment on the identified growth areas. But we do think that Cranbrook and the proposed new town in East Devon should be included. There will be many more new homes built at Cranbrook for both housing and employment. We appreciate that it may be too early to start modelling for the new town, but with this Plan expected to run to 2040 it should at least get a mention because it is likely to have a major impact on the A30 and local roads facing towards Exeter.

27.Do you have any other comments about the strategy for Rural Devon and Market & Coastal Towns in the Local Transport Plan?

We are pleased to read that you are considering the development of Hub & Ride facilities in rural areas, but instead of saying 'We could develop....', we would like a stronger commitment – '**We will develop.....where local communities agree**'. We have made this point previously that P&R facilities should be developed in rural areas, which must include ample parking and support facilities to encourage commuters to use public transport and other means of travel like electric bikes and scooters closer to Exeter. We are aware that such a facility is being planned for the edge of Okehampton with a new rail station, but similar facilities must be developed on the edge of towns and villages to link to rural bus services. This may require the provision of new bus stops on the edge of these communities where car parking can be established.

We hope that the recently announced government funding for improved bus services in the county can be used towards strengthening rural bus patronage.

30.Do you have any other comments about the strategy for Asset Management and Road Safety in the Local Transport Plan?

In the identified ***Key elements of the strategy for asset management and road safety*** listed on page 63, we particularly support those listed under **Greater Places for People**.

- 20mph speed limit in settlements where locally supported.
- Implement School Streets where appropriate to continue to safer walking and cycling options for school children.
- Use of Healthy Street design tool in new projects.
- Complement new infrastructure with engagement and behaviour change measures

Many roads in the city have 20mph speed limits but our experience is that too many drivers ignore this – including bus drivers. Can more be done to police these speed limits, including the provision of speed detection signage to remind drivers of what the speed limit is?

Exeter's roads are busy, with many schools positioned close to or on secondary roads, but we are not aware of any schools that have had significant interventions to change the behaviour of motorists other than the usual zigzag lines, which have been in place for many years, and sometimes ignored by parents waiting in cars to collect their children. If the highway authority is serious about making space for children to be safer, you should consider building out pavements to provide more space for children and parents and to prevent cars parking close to school gates.

31.Do you support Devon and Torbay having a new *Local Transport Plan*?

We do strongly support the development of this updated LTP4 but it must go further in encouraging or requiring more people to not use their cars at peak times.

33.Do you have any further comments about transport in Devon and Torbay generally?

Most of what relates to this question we have included for the questions above. Whilst this Plan may be high level and dependent upon government funding, we are concerned that it is devoid of any success measures to reduce congestion and provide active travel options for commuters. These could include:

- that the number of cars on our roads should not increase despite a growing population;
- that air quality should reduce well below safe limits;
- that journey times in Exeter at peak times will reduce due to less congestion;
- that the number of people cycling to work should double.

The only target included is of course that 50% of people in Exeter should travel by active means.

To help give the Plan more focus, we would also like to see the use of SMART monitoring added, perhaps to those.

Yours faithfully

A handwritten signature in black ink, reading 'K Lewis' in a cursive style.

Keith Lewis.