



Transport Planning
Room 120,
Devon County Council
County Hall
Topsham Road
Exeter EX2 4QD.

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By email to:

transportplanning-mailbox@devon.gov.uk

Dear Transport Planning Team.

Consultation. A379 Bridge Road, Exeter: Bridge replacement scheme

Exeter Civic Society has taken an interest in this proposal because we are increasingly concerned about traffic flows into the city and the congestion it causes, making the city less attractive.

We understand that the Friends of Exeter Ship Canal & Heritage Harbour jointly with the Inland Waterways Association have been working with the council's bridges team for some years now to investigate how the air draft below the bridge can be increased. They believed there was an understanding between you and them to increase the air draft to allow more craft to pass under the highway, resulting in the need to open the bridges less often. They were also pleased that you had investigated the provision of a pedestrian and cycle underpass, removing the need to have a traffic light controlled crossing on each carriageway. Both of the above issues would have allowed traffic to flow more efficiently, but that opportunity will be lost if you proceed with your preferred Option 2.

We urge you to review and reconsider Options 3 & 4, for which you have provided very little detail, including how much the highway will be raised, the resultant air drafts, and the benefits, as previously discussed with FESCHH and the IWA. You have not published any analysis of the five options other than in the simple table in the Bridge Proposals section, so it is impossible to make an informed response to this consultation in comparing the options. Overall, we consider that your public consultation process is poor.

In the Scheme Overview on the consultation website it states:

The A379 Bridge Road scheme would aim to:	But when considering Options 3 & 4, the statements made for Option 2 do not offer as many benefits.
Provide a reliable and resilient crossing of the Exeter Canal and surrounding road network by maintaining two lanes of traffic in both directions across the canal bridges	These options will achieve better outcomes with less disruption caused by the bridges opening as frequently, and fewer instances of disruption from pedestrians and cyclists crossing the A379.
Improve safety for all users	Pedestrians and cyclists will be safer by not having to cross

along Bridge Road	the A379 if they are able to use a dedicated underpass.
Improve the environment for people walking, wheeling and cycling, including those using the Exe Estuary Trail and other local routes	In what ways are people's environment improved by option 2? The wider pavements on the bridges can be provided for all schemes, and surely there is an environmental benefit for people not crossing a busy road, and fewer emissions from vehicle engines idling when stopped at crossings.
Provide a reliable diversion route when there are incidents or delays on the M5	The diversion route for the M5 will be improved if the bridges are less likely to be raised for canal boats, or people/cyclists crossing the A379.
Support the efficient movement of vessels on the canal for leisure and ferry traffic	Option 2 will offer no benefits for canal vessels, but options 3&4 will allow more canal vessels to pass under the highway without the need to open the bridges. Future modelling of the traffic into and out of Exeter needs to consider the canal as an additional highway into the city centre for goods. The 20 year redevelopment of the Water Lane area and the construction of the proposed District Heating Plant at Clapperbrook Lane are both positioned alongside the canal. The movement of construction materials via canal rather than already congested roads should be a consideration. In addition, the canal can be used for Last Mile Delivery plans to deliver goods into the centre, from where it can be distributed by bicycles and small white vans.
Reduce the on-going costs of maintaining the bridges and avoid the likelihood of any unplanned bridge closures and associated disruption caused as a result	All options for new bridges will achieve this. But if either of options 3 or 4 were developed we believe that the maintenance needs for the bridges may be reduced if they are opened less frequently.
Enable the planned development near Bridge Road to be built and occupied	This statement should be removed as it is bogus. We believe this consideration was achieved when the A379 was recently widened and the external footpath installed to the medieval bridge.

It can be seen above that options 3&4 offer more benefits than option 2.

Under the section **Bridge Proposals** it is stated 'To identify the preferred option for the scheme, our designers and engineers have investigated five different bridge options. These were each assessed against the following criteria:

Criteria.	But when considering Options 3 & 4, the criteria can be met if a broader view of the criteria is considered.
Suitability – alignment with scheme objectives.	If the scheme objectives are the aims identified above then our analysis above demonstrates options 3 & 4 have more benefits.
Deliverability – cost, potential land take, construction feasibility	Cost: It is mentioned on the consultation site that the scheme cost is about £42m against a government threshold of £50m. There is therefore plenty of headroom to bid for options 3 or 4 which we

	appreciate are more costly. In addition, the current proposals appear to include cycle path improvements 'off-site', which if removed, would provide greater headroom. Potential land take: This should not be a barrier to developing a scheme that has improved outcomes for people, and with adjacent land being controlled by the EA and ECC, it should be possible to acquire most of this at low cost if they support an improved scheme. Construction feasibility: You have not published any evidence to show problems with construction, and as discussions with FESCHH, the IWA, and Harbour Master were on-going earlier this year into options 3&4, we presume that they were feasible then.
Acceptability – environmental, social and user impacts	Environmental acceptability: You have not published these so it is not possible to assess them, but It seems to us that a more expansive scheme would have minimal environmental impact. Option 4 could for example divert the approach path from the west alongside the canal to avoid raising the towpath, and we believe that the ramped pedestrian / cycle loop to the south west of the canal can be set away from the canal towpath. We appreciate that there will be other environmental impacts but we believe these can be mitigated. Social and user impacts: Again, you have not published these to the public cannot comment upon them. But, as set out above, we can only see positive social impact for people in removing a barrier to the flow of both vehicles on the A379 and for boats, people and cyclists passing under.

The consultation fails to provide any evidence to support your claims.

The consultation goes on to say: Option 4 looked at replacing the bridges at a slightly higher level than they are currently. This would create space for an underpass below the bridge which could be used by pedestrians and cyclists. This option was investigated further but was eventually discounted for the following reasons:

Reasons given	Our comments
More expensive to deliver	Yes, but there is plenty of headroom in the £50m government limit for such essential schemes.
Safety concerns for users of the underpass	You have not explained what these are. There are many examples of cyclists passing under bridges in the city at Exe bridges, Marsh Barton, Cowick Street. We presume that the underpass would be under the fixed highway and not the bridges, and as each highway is only two lanes, there would be plenty of daylight
Risk of the underpass flooding	We believe this is highly unlikely except in extreme weather or flooding. The canal towpath is elevated above the adjacent ground, and whilst we understand that the towpath may need to be lowered a little to provide good headroom, we see no reason why the surface could not drain freely onto the lower ground.
Requires more land	Yes, but there are greater benefits.
Greater environmental impact	Yes, but there are greater benefits, and we are sure that any impact can be mitigated.
Active Travel England	This is unfortunate, but we wonder if the design of the underpass

suggested that this was not a preferred option	has been sufficiently explored to alleviate there concerns. We understand that the Exeter Cycle Campaign is supportive of the underpass.
Cyclists would need to make a significant diversion away from their desired route to reach the new level of the bridge to cross the canal	We do not believe that changes to the positioning of crossings that will support an underpass will add significantly to journeys for either pedestrians or cyclists. After all, users of the canal towpath will be making a significant journey themselves so a few additional meters at this location will be insignificant . If option 4 is adopted the project will save the cost of any footpath on the east side of the bridges, which will be consistent with the rest of Bridge Road.

The consultation goes on to say:

The proposed option, which best fulfils the criteria, is to replace the two ageing bridges at the same road level with two new bascule 'lifting' bridges (Figure 1 and Figure 2) that are designed to last more than 60 years. The road layout would be adjusted and slightly widened so that two-way traffic can be maintained, even when one bridge is closed for maintenance. This would allow vessels to pass underneath the bridges similar to the existing situation, but the bridges would be more reliable and quicker at opening and closing.

As you have not made clear what the criteria is we are not convinced that it is the case and that option 2 is the only deliverable option, and provide further comments about your preferred option below.

You say – This option would:	Our comments: These refer to the bridge replacement scheme and not the wider cycle route works.
Improve safety	There is very little difference between option 2 and options 3 & 4 to justify this statement. And surely, by not requiring pedestrians and cyclists to cross a road will be a safety improvement.
Make it easier and more convenient for people to walk, wheel and cycle	We disagree. By removing the need for people to cross a busy four lane carriageway it will be surely easier and more convenient for people to walk, wheel and cycle.
Require the least land	This may be the case, but options 3 & 4 offer additional benefits for all forms of travel.
Offer the best value for money	We disagree. It is the cheapest option but how, for such a large and complex scheme can you assess VFM? If you have a modelling tool to demonstrate VFM we request that you publish it.
Add resilience to the road network.	We disagree. Other than replacing the bridges with new ones that will last for 60 years (as do three other options), nothing in option 2 adds to the resilience of this part of the road network. But options 3&4 offer benefits to allow an improved flow of traffic if traffic lights for the crossing are removed.

Finally, we object to the inclusion of off-site works in this project to improve cycle routes at Matford roundabout and through King George V playing fields. These should be paid for from ATE funding, or in the case of the Matford roundabout works, from developers of housing to the south west of Exeter, and those in Exminster itself.

We also object to the provision of a bus stop **on** the A379 at King George V playing fields because a stopped bus will impede the flow of traffic on this critical route which is often used as a relief road when the M5 is closed around the city. If a bus stop is required, it should be set into a layby as is the case on the opposite side of the A379.

Yours faithfully

K Lewis

Keith Lewis. Chairman