

SUSTAINABLE TRANSPORT SPD CONSULTATION STATEMENT

APPENDIX 2 – PHASE 2 CONSULTATION – RESPONSE TO REPRESENTATIONS

Chpt/para	Respondent	Comment	Response
1	Transition Exeter	In summary, we agree with the underlying principles, as set out in Section 1 (especially 1.3.2); the emphasis throughout on making walking, cycling, buses convenient and attractive; and requiring greater cycle parking in the city. Transition Exeter’s Transport Group welcomes this report and its recognition of the need to move towards more sustainable forms of travel within, to and from the city. (e.g. Planning development around the motorist, to the exclusion of other modes, makes development inaccessible to a significant proportion of the population)	Support welcomed.
		However, we question whether the scale and rapidity of the developments now taking place can be met by minor additions and changes to existing infrastructure. In our view a further 20,000 residents in the area will put immense pressures, especially towards the city centre whose existing highway and street networks will not be able to cope with a rise of 25% road traffic growth.	The strategic housing allocations for Exeter have already been set by the Core Strategy, which was informed by a series of transport studies prepared by DCC. This SPD is designed to help ensure that the transport strategies proposed in those studies are implemented.
		Currently about 45,000 passengers are carried daily by buses in the Exeter area. If a further 10,000 - 12,000 are added to this total, will the kinds of proposals outlined in this paper (e.g. 10.4.2) be adequate to manage this kind of capacity change?	The Exeter Growth Bus Strategy (see para 3.10.1 of the SPD) has been prepared by DCC in discussion with, and with the approval of, Stagecoach as the major operator in and around the city.
		We welcome the ambition for a more radical change in public transport provision which will be required (e.g. a step change in the quality, capacity and environmental performance of public transport, especially between the City Centre and proposed developments adjoining the City to the east in East Devon and to the south west in Teignbridge 3.1.3.). But the	More detail appears in the studies referred to above, in particular the Exeter Growth Bus Strategy and “Enhancing the Public Transport System...”.

		<p>detail of what this might mean is missing. Talk a few years ago of a High Quality PT route turned out to be an illusory laser-optic guided bus service, which may operate well on Greenfield sites, but not realistic in the narrow radial corridors in central Exeter, without major alterations to highways. As this step change is so central to much of the Consultation (and other transport policies), we would ask for more detail in these proposals so they can be assessed. Where is the resource base for providing for such aspirations?</p>	
		<p>We see the need for a holistic (integrated) city centre travel strategy, from which a traffic management strategy would be derived, the lack of which has been highlighted by the recent changes to Paris Street and Sidwell Street, and the lack of anticipation and responses to the problems generated by the consequent diversions.</p>	<p>The example of Paris Street / Sidwell Street in fact demonstrates that incremental changes are preferable to the introduction of a geographically wide-ranging package of changes at the same time. As demonstrated by the previous changes to Paris Street, any initial problems can be addressed and resolved relatively quickly.</p>
		<p>We note with regret the absence of any serious discussion on congestion pricing or an analysis of the economic and ecological damage brought about by excess traffic in the streets of historic cities and which undermine moves towards sustainability.</p>	<p>The SPD is based on a presumption, unchallenged by any of the representations received, that promotion of sustainable travel modes is desirable and necessary to serve the growth that Exeter is set to experience. An analysis of the kind proposed by Transition Exeter would not have changed that presumption. If congestion pricing were to be proposed, it would have to be through a higher level of policy than this SPD. The absence of support at government level makes this difficult or impossible for local authorities to achieve on their own.</p>
		<p>One critical issue for us is not to go ahead with new developments until public transport or cycling infrastructure is</p>	<p>Unfortunately this is a feature of the way public transport in this country is financed. Paragraph</p>

		<p>in place, but recent experience in Exeter has been very inconsistent in this approach. We already have significant new housing in areas such as Newcourt and Cranbrook with no bus service in place. In these cases new residents have no alternative but to use cars and these are already adding to air pollution, congestion and carbon emissions in the city. The timing of new stations and services is so important in relation to new developments. One would not expect utilities to wait until people move in to an area, and we would argue that public transport especially should be treated with more seriousness.</p>	10.2.5 is designed to address this as far as possible.
		<p>Finally, this consultation paper does lack detail and yet it is in detailed implemented plans that sustainable transport is made a reality, or not. We welcome the general broad brush approach but effectiveness will have to be judged by results. In particular, whether the plan actually reduces the need to travel, which has to be a primary goal, and whether there is a significant change in travel mode away from individualised driving, is yet to be seen.</p> <p>Submitted a recent study on Traffic Demand Management produced for a modern Chinese city.</p>	We consider the SPD is detailed, for example it provides checklists for applicants, and detailed model conditions. By its own admission (1.1.1), it is based on the premise that development generates a need to travel. Reduction in travel demand depends on many factors outside the scope of this document.
1.3	Low Carbon Task Force	<p>Given the carbon reduction imperative which has been recognised by successive governments, it is surprising that this section makes no reference to the need for sustainable transport to be promoted, to help contain and then reduce the carbon footprint of transport. Transport accounts for 20% of the country's total carbon emissions and the level of emissions has been growing inexorably. The effective promotion of low carbon modes of transport could have a major impact on this.</p>	Agreed. See now 1.3.3.
1.3.3 (now 1.3.4)	BRE Global	<p>Supports comment that sustainable transport solutions are easier and cheaper to achieve if addressed at the</p>	Support welcomed.

		masterplanning stage. Commends BREEAM Communities 2012 to us.	
2	ECC Environmental Improvements Officer	Planning guidance including Manual for Streets is being reviewed by Lord Taylor. This may impact on this chapter and the document as a whole.	Lord Taylor's recommendations include retaining Manual for Streets for the time being, although in the longer term it is said not to be needed in its current format. This SPD has been written so as to be consistent with the NPPF, which is expressly outside the scope of the review; therefore it is not proposed to delay adoption of this SPD.
2	Low Carbon Task Force	As above, there should be a reference to carbon reduction and to air quality as part of the national policy context. Para 30 of the NPPF states that 'encouragement should be given to solutions which support reductions in greenhouse gas emissions', so a brief reference to this is justified.	Agreed. See now 2.1.2.
3.1.8	Mrs Norton	Concerned about Countess Wear roundabout accommodating traffic from Newcourt.	The SPD is intended to promote the use of sustainable transport, and thereby enable development to take place without exacerbating congestion.
3.1.8	Mr York	Whole document founded on false premise that development must happen to the south west of Exeter. Urban extensions and Cranbrook will increase population of city by nearly 50%, and local authorities have paid insufficient regard to enormous increase in infrastructure required. <ul style="list-style-type: none"> • Roads into city overloaded and pollution above acceptable limits. • Peamore park and ride and/or extended bus routes won't move sufficient people out of cars; nor will walking and cycling because it is too far. • Marsh Barton station unlikely to happen until 2018; problems with funding, compulsory purchase and timetable space. 	The housing land within the Exeter boundary was allocated by the Core Strategy, and it is anticipated that the housing land within Teignbridge will be allocated by that Council's Local Plan. This SPD has to be set in that context. It is intended to promote the use of sustainable transport, and thereby enable development to take place without exacerbating congestion. Park and ride, bus services and the rail station are all components of a package designed to reduce car use in the city, and no single element is expected to provide a complete solution on its own. The road links referred to by

		<ul style="list-style-type: none"> • Chudleigh, Dawlish and Shillingford Roads must be engineered to discourage traffic. • Need another river crossing, perhaps at St Davids station. • Not sensible to construct housing bisected by A379 in its present form; could by pass by new link from Matford roundabout to M5 at Exminster. 	<p>Mr York are not proposed; it is outside the scope of this document to propose them, and Chapter 12 simply summarises proposals which already exist.</p> <p>Engineering solutions to discourage traffic, funded by developer contributions, are supported by paragraph 9.2.1 of the SPD.</p>
3.9.1 to 3.9.3	Exeter Civic Society	<p>Bullet points of Exeter Strategy all acceptable. However, reorganisation of traffic in the centre of Exeter has caused problems which are not solving themselves as well as DCC expected.</p> <p>Monitoring of Cowley Bridge Road, New North Road, Bonhay Road, Blackall Road, York Road, Summerland Street, Sidwell Street and Paris Street must be seen to continue, and some changes may need to be considered. For example, buses should not be expected to negotiate the sharp turns from New North Road into Longbrook St and then into York Road. To enable them and incoming cars to use Blackall Road, widen carriageway by removing pavement on south side between prison and Howell Road.</p>	<p>Support welcomed.</p> <p>Issues caused by previous development are outside the scope of this SPD although they have informed its production. The specific issues mentioned will continue to be monitored and, where appropriate, addressed.</p>
3.9.3	Transition Exeter	<p>LTP3 speaks of the need for 'demand management measures such as workplace parking'. We would agree with this assessment and funding for travel planning, but do not find sufficient detailed information in this document. How and where may workplace charging be introduced? Will income raised be hypothecated (ring-fenced) and how will it be used to subsidise new services and facilities? Can we look too for out-of-town car park charging to be used to the same ends? (which we would also support)</p>	<p>The reference in LTP3 envisages money being reinvested in the transport system. The principal mechanism for charges is likely to be through travel plans, so a reference has been included in 8.1.3.</p> <p>The mechanism is most likely to be used at workplaces, but could potentially apply at other types of development.</p>
3.10	Mr Read	<p>In favour of providing walking routes along desire lines, and safe road crossings for pedestrians. Lists a number of locations where he feels this is not the case at present.</p>	<p>Support welcomed. He has been sent a written reply in relation to his specific examples.</p>

3.11	ECC Environmental Health	Need to explain that the AQAP is under review and the new version should be published in early 2013. In recognition of the fact that goods vehicles produce a higher proportion of total emissions than their proportion in total traffic flow would suggest, the AQAP2 will aim particularly to reduce emissions from these vehicles. May also want to also mention that part of the AQAP2 will be to develop a Low Emissions Strategy for the city.	Agreed. See now 3.11.2.
4.1.1	ECC Environmental Improvements Officer	Levels can be an issue on development sites in Exeter. Should recognise that there are instances where best practice requirements (for gradients etc) cannot be met and that developers should take reasonable measures taking into account underlying topography, a common sense approach to design of the public realm and the use of reasonable measures to accommodate all people.	Agreed. Included as new paragraph 4.1.3, with cross reference in 4.1.1.
4.1.1	Mrs Lant	First bullet point should refer to the needs of visually impaired people; also 8 th bullet re entrances etc. Steps, railings etc enable visually impaired people to tell where they are; although if badly placed they create obstacles. Edge of steps should include a white line. Customer information systems should be easy for visually impaired people to locate, and include an audio facility.	Agreed. Reference to the needs of visually impaired people included in bullet points 1 (footpaths), 4 (street furniture) and 8 (entrances etc). Bullet point added re customer information systems being easy to locate and use for people with all disabilities.
5	Transition Exeter	We welcome the identification of Cycle Parking standards (Section 5) although we view the minimum standards as too low and would prefer the city to take a more robust stance on this. The problem with the table (Table 2) used is that some properties will be more suited to cycling because of their location and accessibility than others, and some sites (e.g. University) will attract residents more capable of regular bike use because of their age.	The standards are expressly minima and 5.1.3 says that applicants should consider providing more if the site is favourably located for cycling. The standards are based on evidence from:- <ul style="list-style-type: none"> • workplace surveys: staff numbers, parking provision and how well used it is; • visual surveys of provision and use of cycle parking, especially at supermarkets and retail parks; • ECC "Wavelength" survey to establish the

			extent to which lack of cycle parking is a barrier to cycling.
		Additionally, we call for the development of more route networks for cycling and walking, tying that in to the possibility of using the Park and Ride sites for change to any mode of travel in particular cycling onwards into the city centre, and so on.	See Exeter Walking and Cycle Strategies, referred to at 3.10, also for example 9.2.5 and 10.1.1. Existing park and ride facilities can be used in conjunction with cycling.
		The potential of cycling in conjunction with rail and bus use is not referred to in this section, which we believe is an oversight. Our own view is that some bikes could be taken on buses, as is common in European countries and in the United States, and was formerly the case on the Truro bus company; although this is currently considered unduly hazardous by the operator Stagecoach in the SouthWest. A trial on a commuting bus route might help to test feasibility. We think there is great potential for 'cycle and ride' for those who may not want to cycle long distances or feel the whole journey by bicycle is too far. I would favour a series of high quality, covered and secure cycle parks at important PT junctions/hubs. This would be a crucial aspect of the enhanced Devon Metro as well.	Cycle facilities (casual and secure storage, and hire) are already being developed, particularly at stations in conjunction with train operators; it is not considered necessary to elaborate on this in a document aimed at developers. Buses in Exeter are too well-used and subject to time constraints to expect the operator to carry bikes, even if the physical and/or legal issues could be overcome.
5	University of Exeter	Welcomes the comprehensive guidance on cycle parking and facilities. Meaning of "secure" needs to be clarified, because some locations under natural surveillance may be sufficiently secure without a lockable enclosure. This needs to be assessed on a case by case basis.	Agreed. Clarified in 5.3.1 that an open facility for staff will only be acceptable if well overlooked at all times it is likely to be used.
5.2.1	Mrs Norton	Supports need for garages to be wide enough for modern cars, and enable bicycles to be taken in and out with car in situ.	Support welcomed.
5.5	CTC Right to Ride	Question the dimensions in the linked ready reckoner for calculating cycle parking. Firstly, I don't think the 1m aisle width is adequate to allow bikes to be turned into racks.	These measurements are the minimum that will work, because the purpose of the calculator is to establish how many bikes can be parked in a

		<p>Secondly, is the 1.2m width between stands adequate to allow bike plus rider to squeeze between two other bikes to reach back of store when b is 3.5m long. I suggest limit b to 1.75m long. Front aisle width should be increased from 1m to at least 1.8m (reference Cambridge Cycle Parking Guide)</p>	<p>given space, using an easy, secure and uncomplicated storage system. A note has been added to the calculator to indicate that they are minimum standards.</p>
5 and 6	Transition Exeter	<p>Tables 2, 3 and 4 would be much easier to assess if the cycle and car parking lists followed the same categories and scale of measurement.</p>	<p>Cycle parking standards are being retained as minima, therefore Table 2 has been reviewed using an evidence-based approach. However the former maximum car parking standards are being retained purely as indicative standards (except for those for disabled users, which remain as minima), so they have not been reviewed.</p>
		<p>Table 2 – Cycle Parking suggests that the requirement can be reduced for retirement homes if age >60 – but this parking is for staff as well as residents and older people need more staff so the reduction seems inappropriate.</p>	<p>Retirement apartments: staffing is typically low, with one home manager serving a large number of flats.</p>
		<p>Questions whether parking standards for workplaces are enough, and what are they based on.</p>	<p>Workplaces in the city were surveyed for amount of cycle parking, numbers of staff, and usage made of cycle parking.</p>
6	University of Exeter	<p>Welcomes the comprehensive guidance on car parking requirements; also the flexibility resulting from the standards in Table 3 being indicative not maxima. In tandem with a strong travel plan and other proposals in the University's Masterplan Framework, this is likely to allow more flexibility, so preventing parking constraints being a hindrance to economic prosperity and job creation.</p>	<p>Support welcomed.</p>
6	ECC Environmental Improvements Officer	<p>Census data (due by end of Jan 2013) should provide up to date information on car ownership in Exeter, which could inform this chapter and provide more accurate guidance on car parking requirements in new developments. (The data should be able to be broken down on a ward basis, and</p>	<p>As the former maxima are being retained purely as indicative standards, they have not been reviewed. Paragraphs 6.2.1 and 6.2.2 have been reordered and 6.2.2 amended to make this clear. However, the census data will be examined for</p>

		according to household size/type, so we can compare car ownership in city centre with more peripheral locations). This could then be reflected in the SPD and the Site Allocations and DM DPD.	relevance to 6.3 (Car free developments.)
		Asked whether any analysis was available on parking requirements for retail development in city centre/edge of centre/out of town locations.	Again, as the standards are being retained as indicative only, they have not been subject to rigorous examination.
6	Transition Exeter	We believe Car Parking strategies need to be accompanied by a stronger disincentives for car use, and in particular co-related to equivalent bus fares. It should not be cheaper to park than to use the bus for parallel single person return journeys.	This would be impossible to achieve, because parking charges relate to length of stay regardless of distance travelled, whereas public transport fares relate to length of journey regardless of stay.
		We support car-free developments and look to the first of these to be developed in Exeter and applaud the use of car sharing through car clubs such as Exeter Co-Cars (Section 11). We believe that all new developments of 50 dwellings or more (whether 'car-free' or not) should include a car club, funded by the developer, and again in place before the dwellings become occupied. New occupants could receive discounts on first year's usage, again funded by the developer. This could act as a major incentive to new occupants to enable them to feel confident/secure living there without owning a car.	Support for car clubs is welcomed. The suggested one car per 50 dwellings is too high for most locations; see response from Co-Cars to 11.2.4. Car clubs need to be complemented by other sustainable transport measures, hence their suitability for inclusion in travel plans; see 8.1.3.
6.2	Mrs Lant	Some parking spaces for disabled users need to be wider.	There is already a cross-reference to 4.1.1; reference to dimensions of spaces now included.
6.3.1	Mrs Lant	Residents' Parking system needs to remain accessible to people who don't use the internet.	A practical matter for DCC outside the scope of this SPD; comment has been forwarded to them.
6.3.2	Transition Exeter	The requirement to contribute to the enhancement of facilities for public transport, cycling and pedestrians (6.3.2) should apply to all developments, not just car-free.	See Chapter 9.
6.5.1	Co-Cars	Provision of an electric charging point as part of a car club provision (see section 11) in a new development, whether	If this refers solely to points for car club vehicles, see Chapter 11. If Co-Cars mean that the SPD

		business or residential would create a wider network and faster. Co-cars are happy to manage and look after the electric points, and are aiming to introduce electric / hybrid cars. Co-cars believe the policy could be stronger in stating this are a requirement maybe in the large developments, or as an optional second car.	should be more prescriptive in relation to charging points generally, it is difficult to justify anything beyond the current future-proofing approach, as it is not known what the uptake of electric vehicles will be.
6.5.1	Low Carbon Task Force	Welcomes the encouragement of provision for electric vehicle charging. Suggests that public facilities (including car parks) should be added to the list in the last sentence of this paragraph. Amend model conditions in section 6.8 to give some greater focus to efforts to include charging points within the approvals for forthcoming major developments.	Public parking now included in 6.5.1. Charging points included in model condition in 6.8.1, but optional for the same reason as set out above.
6.6.2	Mrs Lant	Car parks need walkways for people to get between parking spaces; also taxis need to be able to get close to the entrance to premises, to assist customers with disabilities.	Agreed and included.
6.6.2	Transition Exeter	“Shops and offices should be designed and located so that their front entrances are directly off main streets, not involving a long walk across a car park.” Should this not also apply to other buildings: hotels, schools, health centres, community centres, etc.?	Agreed; changed to “premises”.
7	ECC Environmental Improvements Officer	Relate more explicitly to Residential Design SPD context appraisal chapter.	Agreed; reference included in 7.1.2.
7.1.1	Mrs Lant	There needs to be a mechanism for informing visually impaired people know when pedestrian routes are going to change as a result of development.	This is not really a matter of planning policy. The practicality of achieving this will be discussed with DCC.
7.2	Low Carbon Task Force	Need to be more positive on the general merits of connectivity. The wording is at present a bit neutral, but connectivity for bus, bike and walk should be a fundamental design principle.	Agreed; now included in 7.1.2.
7.2.1	ECC	Text should include reference to ensuring development	This is in paragraph 9.2.5.

	Environmental Improvements Officer	makes short and direct connections to local facilities, walking/cycling routes, bus stops and train stations.	
8	Exeter Civic Society	Travel plans for residential and workplaces need to be specified in detail at an early stage as part of a planning application.	Requiring the detailed plan prior to occupation is considered appropriate. Travel plans prepared too early in the process tend to be generic in form with insufficient practical detail.
8	Transition Exeter	We agree very much with the principle of Travel Plans but remain slightly critical as to whether they are sufficiently adhered to, monitored or enforced.	Support welcomed. Model condition at 8.3.1 includes reference to monitoring and review. Enforcement is constrained by resources but does happen, at least on a reactive basis.
8.1.3	DCC	Replace “season tickets” with “bus tickets”.	Replaced with “bus or train tickets”.
8.1.3	University of Exeter	Need to acknowledge the potential tax implications of providing bicycle vouchers or season tickets, which might be a deterrent.	Agreed; included in footnote.
8.1.3	Transition Exeter	The discussion of travel plan contents (8.1.3.) should be strengthened: less ‘is likely to’, ‘may’, and more ‘will’. (Travel packs, 8.1.4, is better).	Travel plans need to suit the individual development and there is no “one size fits all solution”, therefore the list of contents is not prescriptive.
8.1.4	Mrs Lant	Travel packs need to be available in different formats.	This has already been raised with DCC following the EQIA, and reference has now been included in 8.1.4.
9	Exeter Civic Society	Identification of transport improvement is necessary from the earliest stage so that developers realise the extent of their commitment, even when contemplating purchase of the site and evaluating costs.	All ECC planning policies are publicly available, in addition to which the Council has a protocol for major applications, whereby prospective developers can obtain pre-application advice.
9	Simon Lloyd	Need to do more to encourage cycling: install more cycle routes; also close streets on Sundays for family cycle days.	Cycle routes are referred to in 9.2.5 and 10.1.1, for example. Occasional street closures are outside the scope of this SPD.
9.2.1	Transition Exeter	‘Contributions may be required for roads’, should include a reference to meeting the needs of cyclists – cyclists mentioned in 9.2.5 but cyclists are road users alongside cars	This is covered in chapter 10 which relates to on-site roads constructed by developers. Off-site roads funded by developer contributions will

		and roads design needs to account for them e.g. cycle paths, signage, links to primary and secondary cycle networks.	normally be constructed by DCC who will determine the design.
9.2.3	Transition Exeter	In our view the role of rail for the city is still not realised, but we applaud the decision to construct 3 new stations (noting in passing that these have been proposed in planning developments for the city since the 1970s but still not built!). The potential for the Devon Metro is beginning to be recognised and extra investment in infrastructure and rolling stock is essential. We hold that this concept could be extended through better integrated transport and ticketing—linking of trains, buses, cycles and taxis, and will outline our views on this our forthcoming 10 point plan ‘Devon Metro Plus’ to be published in 2013.	Support welcomed. ECC and DCC are engaging with the rail industry with a view to securing more investment in rolling stock and infrastructure. Smart and integrated ticketing is developing nationally and locally; it is not something over which developers have any influence, hence its omission from this SPD.
9.2.4	Transition Exeter	The wording ‘may be required’ is weak in this context. The provision of enhanced services in the future will necessitate better travel facilities, including realistic and reliable information. It will also need new bus priority measures and their implementation. It is clear that existing bus lanes are abused and this detracts significantly from any step change to better bus services.	Whether and for what purpose financial contributions are sought will depend on the location and circumstances, therefore the wording is appropriate and consistent with all subparagraphs of 9.2.
9.2.4	Mrs Lant	Electronic displays should include audio for visually impaired people.	4.1.1 has been amended to say that information systems should, wherever practicable, be easy for all disabled users to locate and use. It would not be possible to require audio as a mandatory planning requirement.
10	Exeter Civic Society	This section should include access requirements for emergency vehicles and refuse collection.	Agreed; added to 10.2.1.
10	ECC Environmental Improvements Officer	Relate more explicitly to Residential Design SPD context appraisal chapter.	Agreed; added to 10.2.1.
10	Transition	Support the concept of a Hierarchy of Streets. Ask how this	As with much of the SPD, it is directed at new

	Exeter	will be implementable to existing road networks.	development rather than existing networks.
10.1	ECC Environmental Improvements Officer	Add 'Making Connections' section here to state at the start of this chapter that development must make short and direct connections to local facilities, walking/cycling routes, bus stops and train stations.	Inserted in 10.2.6.
10.2.4 – 10.2.6	Transition Exeter	As indicated above enactment of new services in conjunction with new building developments is vital, but the timing of this should be brought forward prior to occupation of properties. Services must be phased in much earlier in all major developments. New bus facilities should be easily accessible (quantified in terms of distance, level of service) as soon as the first residents move in,	It is not viable to run services prior to occupation, and during early stages of occupation it may be necessary for residents to rely on existing services, so development should be phased accordingly. Paragraph 10.2.5 is designed to address this as far as possible.
10.2.6	Stagecoach South West	Roads do not have to be narrow or awkwardly laid out to be safe, and unnecessarily slow bus journeys are less attractive to potential passengers and therefore less sustainable. Designated bus routes need to be wide enough to allow manoeuvres without encroaching on the kerb or opposing carriageway. They also need to be direct. Bus-only measures could prevent access by other large vehicles if so desired.	Mostly agreed and included in 10.2.4. Bus only roads not specifically referred to; they can be appropriate in some situations but give rise to enforcement problems.
10.2.6	Mrs Lant	Favours segregation of pedestrians and cyclists. Cyclists should be required to use bells on shared paths.	The study on Shared Use paths by Atkins for the DfT (2012) found that segregation by white line was ineffective in securing compliance, and had little effect on conflict between users. National law does not require cyclists to maintain bells on cycles, and Councils have no legal power to require use of bells.
10.2.7	Mrs Lant	Steps, railings etc enable visually impaired people to tell where they are; although if badly placed they create obstacles.	Reference included to the need to cater for all disabled users, in accordance with paragraph 4.1.1.
11	Co-Cars	Smart card system to be introduced in 2013 gives potential for links with bike hire systems, bus tickets etc, and reference should be made to this.	Now included in 11.1.2.

11.2.1	Co-Cars	It's not just key safes; include telematic swipe card system. Additionally if the car bay is covered by CCTV or in the case of the housing development a security patrol.	Smart card now included in 11.2.1; CCTV already in 11.2.4.
11.2.2	Co-Cars	Add in a line: Contribution to the car club operators costs.	Agreed.
11.2.4	Co-Cars	The costs need updating:- <ul style="list-style-type: none"> • Capital cost 15,000. • In-car telematics system, plus fitting and licensing requirements 2,000. • The contribution to the car club costs is low but still stands, as this is only a contribution to our costs. • Subscription cost 50 per dwelling. These costs increase the cost per dwelling of 250 houses to 143. An option would be to have an electric fast charging point of maximum 6000, but this includes cost of capital, maintenance and civil engineering works.	Agreed. Table 5 amended.
11.2.7	Co-Cars	One car per 250 dwellings is reasonably accurate though 200-250 would be more so. More detailed calculations provided which supersede 11.2.5 and 11.2.6. Should also refer to business use would be useful, ie. a car for developments of 2000sqm or more of Class B1 offices.	Reference to B1 use included.
12.1	Robert McLarin	Greater use of the existing rail network and provision of new halts is applauded and should be implemented asap.	Support welcomed.
12.1	Mrs Lant	Talking customer info systems are desirable at new stations.	Now included in 4.1.1 which sets out detailed requirements for people with all disabilities.
12.2	Exeter Civic Society	Support the proposals, particularly park and ride at Alphington/Ide interchange.	Support welcomed.
12.2	Transition Exeter	Park & Ride is a semi-successful attempt to reduce the pressure of car parking in city centres. It should however be seen as a temporary solution to urban traffic challenges and not permanent. It brings a reliable service to the car driver but is socially exclusive, providing better and cheaper bus routes than in the poorer areas of the city. We think it should be part	Park and ride is part of a package of measures, not a complete solution in itself. Given Exeter's rural hinterland, parts of which are impossible to serve with regular public transport, park and ride provides residents of these areas with the option of not driving into the city.

		of a longer-term strategy to bring better public transport closer to people's homes so that no car driving is necessary. There might be a longer term role for 'Link and Ride' with buses along strategic routes from rural areas into Exeter with a series of smaller car and secure cycle parks along the route.	Park and change is already being considered for locations on existing frequent bus services.
12.3	Transition Exeter	In our view Exeter has good radial bus routes but services around the city are poor in comparison, especially linking residential areas with employment sites. We would therefore propose new services, such as an orbital bus route to open up different journey possibilities, possibly feeding in to stations and other community hubs. Smart ticketing will be essential for all public transport use in the future.	Service development and smart ticketing are both considered in the Exeter Growth Bus Strategy, referred to at 12.3.2.
12.3.1	Low Carbon Task Force	Include 'high quality facility' somewhere in the second sentence - this is important given the current facility's utilitarian nature.	Agreed and included.
12.3.1	Mrs Lant	New bus station needs audio information systems and appropriate tactile paving.	Paragraph 4.1.1 includes reference to these and will apply to the bus station redevelopment.
12.3.2	Exeter Civic Society	To avoid traffic problems caused by, and to, long distance coaches, they should serve a hub in the Sowton area, with smaller vehicles providing transfer to the city centre; would need to provide assistance with luggage.	Coaches make up a very small percentage of vehicles on the road and are not considered to contribute significantly to traffic problems. The desirability of such a transfer system is therefore a matter for their commercial operators.
12	Mr Cummings	Need to safeguard land for a ring road and rail route, westwards from Pinhoe to the A30 at Barley Wood, with rail continuing to rejoin the main line near Exminster. Should feature freight transfer facilities (with biofuel filling stations) and park and ride (with shelter and CCTV). Need automated control of traffic systems. Recycling plants need to be in more convenient locations.	There are no plans for such routes, and it is outside the scope of this document to propose them. Chapter 12 simply summarises proposals which already exist.
12.4	Exeter Civic	Support the proposals, particularly the new roads. Exhibition	Support welcomed.

	Society	Way link (with traffic control at rail bridge) essential for viability of Ibstock development.	
12.4	ECC Estates	What is meant by safeguarding and should there not be a plan for these routes? No intention of creating an additional railway crossing at Exhibition Way, merely enhancement of existing bridge.	More detail and relevant plans are being included in the emerging Site Allocations and Development Management DPD. Description of Exhibition Way link clarified.
12.4.3	Mrs Lant	Opposes Exhibition Way link; the area is valued for recreation, dog walking, listening to birdsong, relaxation, release of stress. Trees were planted just five years ago. Development would exacerbate the flood risk.	Opposition noted; the proposal still has to pass through a number of stages including a public inquiry into the village green application in addition to the planning application process.
12.4.4	Robert McLarin	Water Lane link should be a priority now, and should have been implemented when the last phases of residential development were completed. Madness to have one junction serving this area on a major arterial road. Need to build the Water Lane link or improve existing Tan Lane to Exton Road link by widening the bridge under the railway for all traffic. Make greater use of car park between Haven Road and Water Lane.	Support for safeguarding welcomed; however, construction of the road is not a short or medium term objective for DCC as highway authority.
General	Sustrans	This comprehensive document deals with most sustainable transport issues in urban development very well. There is however a special need to consider transport to and from schools above other journeys because this often causes greatest local traffic congestion problems, has the greatest potential to influence the future travel behaviour of young people and has the most risks for vulnerable road users. The development of schools and the infrastructure around them should give far greater priority to encouraging walking and cycling and discouraging car use.	Support welcomed. Reference to routes to schools covered in 10.2.6, with cross-reference from 7.2.1. Travel plan requirements now included in 8.1.1.
		Secondly, parks and open spaces are places that people of all ages and abilities go for recreational walking and cycling. Where these spaces are provided as part of larger developments the design of the spaces needs to provide	On-site open spaces covered by 10.2.7. Reference to routes to parks covered in 10.2.6, with cross-reference from 7.2.1.

		good facilities for their use, e.g. widths and surfaces of paths. The access to these or pre-existing open spaces from residential developments by foot and cycle also needs to be provided.	
General	Environment Agency	No wish to comment.	Noted.
General	Avocet Line Rail Users Group	No wish to comment.	Noted.
General	Exeter St James Forum	Document a useful reference to how planning rules encourage sustainable transport.	Support welcomed.
General	DCC	Support document, which is comprehensive and well-aligned with Local Transport Plan and Core Strategy transport policies. Suggest restructuring chapters as it's not explicitly clear that chapters 4 to 6 relate to smaller forms of development, or that 7 to 10 are for progressively larger developments. could simplify the order into on-site improvements, parking provision (including car clubs), off-site improvements, and ending with travel planning and significant transport proposals.	Support welcomed. No change is proposed to the structure, which was revised considerably in response to comments received on an initial draft from DCC and ECC officers. It is considered that the existing structure is clear by virtue of section 1.2, Table 1, and the "Applicable to the following" section at the beginning of each chapter. The current structure comprises short chapters which are considered easy to read.
General	Devon Countryside Access Forum	Gratified to see the attention being paid to pedestrian and cycle routes, including such matters as cycle parking.	Support welcomed.
General	Low Carbon Task Force	LCTF welcomes the preparation of this SPD which is an important aspect of planning policy which can, if properly conceived, help to reduce the City's carbon footprint. The draft document does, indeed, address the major issues and priorities which will promote the provision of sustainable transport infrastructure and maximise its likely usage. It should thereby help to contain and eventually reduce the City's carbon footprint. Finally, the document is very easy to	Support welcomed.

		read and the way it has been structured is excellent.	
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