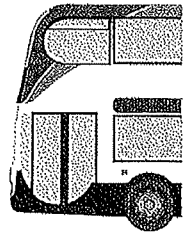


Mr Matthew Diamond
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Exeter City Council
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EXETER
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Matford Park Depot
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stagecoachbus.com



13th July 2018

Dear Mr Diamond,

**Proposed Retail Development on
Land north of Honiton Road and west of Fitzroy Road, Exeter, EX1 3RS**

While we acknowledge our representations come a day or two after the formal public consultation deadline, we nevertheless wish to formally notify you of our objection to the application referenced above, for up to 12,634 sqm. (136,000 sq ft) of mainly class A1 floorspace on this site.

1. Introduction

Stagecoach South West is the principal operator of commercial bus and coach services in the City of Exeter and the wider County. We operate a fleet of nearly 180 buses from our Exeter Depot providing a comprehensive range of local, inter-urban and longer distance bus and coach services. This includes the South West Falcon a 24/7 coach link between Plymouth, Exeter, Bristol Airport and Bristol; and the Park and Ride service in the City. Both of these serve bus stops on Honiton Road a short distance to the east of the site. The hub of our City and County operation is, uncontestedly, Exeter City Centre. Stagecoach alone operates as many as 125 scheduled peak arrivals/hour into the city centre, making it by far the most accessible place by public transport, in the City and County, especially when two main-line rail stations are additionally considered.

Stagecoach is also the current occupier and manager of the Exeter Bus Station site. This site has long been allocated for redevelopment for a comprehensive range of mixed uses, including open A1 retail uses, and has been advanced and confirmed at independent examination of the Exeter City Plan as the most appropriate location for meeting the requirements for additional comparison retail development, and leisure uses, not least on the basis that the site, in the City Centre, represents that where the opportunities to reach it by sustainable modes is maximised. Stagecoach has long been clear about the need for us to work constructively with the City to realise the potential for development on the bus station and former bus depot, which we owned. We welcome the more modern facilities that will be provided by the replacement bus station. The key issues related to the release of the existing bus station site have all been resolved, and we have already partly vacated the bus station site, having left our depot some time ago, for a new site at Matford Park. The construction of a new bus station is about to proceed and at the point in 2020 that this is completed

the current site will be entirely available. While we acknowledge that Land Securities has released its interest in taking the retail and leisure element of the project forward, no doubt other investors do exist, including, potentially, the City Council itself should it be so minded.

2. The proposed development

Stagecoach notes that this is the latest substantive attempt to secure permission for a commercial development on the land. It includes up to just under 136,000 sq ft of retail development across 13 units including two foodstores, and several substantial units that the applicant suggests would be let to a range of national multiple retailers, including Next, Mothercare, Boots and Marks and Spencer.

All these prospective retailers are represented in Exeter City Centre. These fascias are clearly comparison rather than convenience traders, and far from selling products that primarily meet day-to-day needs, are visited much less frequently. It is a matter of public record that both Marks and Spencer and Mothercare are looking to rationalise their UK store state, in line with wider structural changes in consumer behaviour, rather than grow it. We note that the applicant can only supply letters confirming interest from Boots, of those listed, more than circumstantially confirming that occupier interest is muted, to put it generously.

Lidl has been linked to one of the foodstore units. Certainly this would represent a store that would meet the day-to-day needs of the growing residential and employer community within the Monkerton area, and beyond to the east at the Science Park and Redhayes/Mosshayne. However we note that they have indicated that the site does not meet their requirements, not least because access is convoluted and they are no longer progressing discussions with the applicant.

The development therefore represents an attempt to “capture” such very limited retailer appetite for additional comparison retail floorspace as currently and foreseeably exists in the short term, in an edge-of-site location that is very conveniently accessed by car, near to the M5 junction, intercepting growing retail demands to the east before it reaches the City Centre. As such, it can only serve to generally undermine the vitality of the City Centre. We believe that the trade diversion impacts from the City Centre and other established and committed Local and District Centres that the proposal will give rise to are both unjustifiable, and unnecessary.

It is also by its nature likely to be largely car-dependent.

3. Accessibility by Public Transport

The National Planning Policy Framework (NPPF) sets out a number of foundational principles that make clear that sustainable transport considerations are highly relevant and weight very materially in the planning balance. Paragraph 14 makes clear that patterns of development should be actively managed to make the fullest possible use of walking cycling and public transport. And at paragraph 32 it states that plans and proposals should support the rebalancing of transport networks and use towards sustainable modes, and away from private car use.

The site is not well served by public transport certainly in the context of a major retail scheme generating a very high number of trips to be viable. The nearest bus stops are on Honiton Road of which one pair is directly adjacent to the site frontage. However as we go on to show, the frequency

of these services is relatively low and their relevance for shopping trips to the site from either the suggested primary catchment within 3-5 miles, or beyond is in most respects very limited.

The nature of this venue is such that it would not attract longer distance trips on the Falcon coach service that serves stops about 300m to the east on Honiton Road, near the Park and Ride. It is a long distance coach service and the other towns and sub-regional centres on that route have their own much stronger retail venues within much closer and more convenient reach.

The Honiton Road Park and Ride is a little distant to the east, involving a somewhat tortuous walking route crossing the busy Honiton Road, and that service essentially runs fast to the City Centre. It is quite inconceivable that a shopper would board a service from the City Centre to reach this location given that all the fascias that ostensibly (or even conceivably) might take up space here are already represented there.

The Honiton Road stops immediately adjacent to the site are served by the half-hourly 4/4A from Cranbrook and Honiton, continuing to and from Axminster hourly. An additional hourly 56/A service runs to and from the airport. Of the settlements on the routes, most have day-to-day needs well met within their immediate locality, with the possible exception of Cranbrook. However that development will no doubt in time be effectively served with its own convenience shopping offer delivered as part of the future "town centre" within convenient walking or cycling distance of current and future residents. It is entirely inappropriate that this site should be considered to meet Cranbrook's future needs, since, while being accessible by bus, this would generally serve only to truncate the viability of the future provision there, and undermine the pattern of the most sustainably accessible retail hierarchy established within the adopted East Devon Local Plan.

The development is also relatively close to the Science Park and the large-scale residential development at Redhayes/Mosshayne beyond that. The applicant suggests that the development is also partly justified by serving the needs of occupiers and residents there. These sites are up to 3km distant to the east beyond the M5. Whilst accessible by walking and cycling the routes are intimidating and hardly attractive. On September 3rd 2018 we will be introducing a bus route directly serving Tithebarn Green, Redhayes and the Science Park and operating up to every 20 minutes in each direction. However this will route via the Tithebarn Green Link Road and Whipton Barton and will not serve the proposals. It will, of course, provide as convenient possible a link to the City Centre from those places.

Paragraph 35 also makes clear that safe and secure access for all should be provided by development proposals. The site includes a provision to effect the bus-only connection between Fitzroy Road and the Hill Barton farm residential development under construction on adjoining land to the north. This involves a somewhat convoluted routing through what would be a "bus only gate" at or immediately to the north of the site boundary, and necessitate buses using the single vehicular access to the site before making a right hand turn into the residential scheme. A protected right hand turn lane is provided to allow for this without blocking incoming traffic. However, the route through the residential site is relatively narrow and inter-visibility between a right-turning bus and other oncoming within the residential scheme will be relatively limited, which is important especially when parked cars within the residential development are considered, which will limit stretches of the carriageway to single-track working. Over and above delays arising from this, buses could well need to wait for extended periods for oncoming traffic exiting the park, which will have priority,

significantly adding to delays on any new service that could be run using this route. In addition, it would be practically impossible to provide any bus stops on or near this link, including on the site access road, nor are any proposed. This makes it highly unlikely that any service would be routed, or re-routed, in this manner to serve the site and create public transport links to the wider Monkerton area. It is true that existing bus stops will remain on Honiton Road, but the very significant change in level between the site and the footway means an extensive access ramp will be needed to access them. This will hardly encourage access by public transport using existing services on Honiton Road. The proposals are therefore also contrary to NPPF paragraph 29 which requires the opportunities for sustainable transport should be identified and fully taken up, and paragraph 35 which require safe and secure access to all to be provided.

4. Local Planning Policy

The inappropriateness of this site for the scale and A1-class uses proposed is contrary to both the National Planning Policy Framework and to the adopted Exeter City Core Strategy of 2012. It will also serve to have a negative impact on the existing and proposed pattern of retail provision within East Devon, set out in the adopted statutory development plan for East Devon District.

All the main material issues weighing in the planning balance have already been well-aired in the Public Inquiry into previous similar refused proposals for the site submitted as 14/1615/OUT and in essence resubmitted as 15/0704/01. The latter was the subject of an appeal, recovered by the Secretary of State for his determination, and dismissed.

The applicant claims that this proposal is for a District Centre serving primarily local requirements. However we dispute this, given the scale, size of units proposed, and the putative tenant mix proposed, involving goods including clothing, beauty products, gifts and footwear, that clearly go well beyond those needed to meet day-to-day needs. This finding was previously made by the Planning Inspector and the Secretary of State for comparable previous retail proposals on the site. The proposals will introduce a significant comparison offer in the area and serve to undermine the viability of the proposals for the Bus Station site in the city centre, which is demonstrably more appropriate for the uses concerned. The applicant has not demonstrated that the sequential test criteria have been achieved, any more than they had in their previous applications, which failed on appeal for this reason among several others. The need for an out-of-town location for further comparison retail uses is clearly not justified.

As is necessary to be in conformity with national policy, the adopted Exeter Core Strategy seeks to locate types of development generating large number of trips in locations where the use of sustainable modes can be maximised. This principle is set out within NPPF paragraphs 24 and 26. These explicitly direct such development not least comparison retail, towards town centres. Only if no suitable achievable or deliverable sites to meet identified needs can be demonstrated there, are alternative locations potentially appropriate. A sequential approach is then applied, set out in NPPF and Planning Practice Guidance, where sites on the edges of the town or city centre are preferred, before other out-of-town locations. Exeter Core Strategy Policy CP8 therefore directs comparison retail development to the site allocated for mixed use redevelopment at Exeter Bus Station. This site remains, available and achievable, borne out by the fact that large elements of the scheme benefiting from live planning consents, are under construction or due to commence shortly.

While evidently there have been some delays, this is hardly unusual, or indeed unexpected, on large-scale developments of this kind. Contracts to commence construction of the next phases, including the new bus station, are on the point of being let with a view to completion in early 2020.

It is important to note that the language in the Draft Revision NPPF at Paragraph 87 on which consultation took place earlier in 2018, has made changes to the language surrounding the basis on which sequential identification of appropriate sites for “town centre uses” should be conducted. It makes clear that sites can be considered to be available within town centres that are “expected to become available *within a reasonable period*”. This is supported by language in the supporting Consultation Document that makes explicit that this change is to be introduced to avoid needlessly prejudicing city centre sites which by their nature are typically complex. The evidence is now that the project has reached a stage that the land within the old bus station identified for the retail element of the regeneration will be entirely available by 2020.

The Retail Impact Assessment submitted with the application further goes on to claim that the Bus Station site is entirely unsuitable for a Local Centre. This looks at the issue entirely the wrong way round. The applicant is not proposing a Local Centre: it is proposing, in its own words a “District Centre” and in reality it is proposing a substantial open A1 retail development providing a substantial amount of comparison floorspace in large-format units: “town centre uses”. The material issue in question is not whether the Bus Station site can and should accommodate a Local Centre, it is whether the Bus Station site cannot accommodate the demand for further comparison goods floorspace in line with the allocated use mix set out in Core Strategy Policy CP8. Nowhere does the applicant demonstrate, in line with current or draft NPPF, that it cannot do so, and that this requirement should therefore be met in whole or in part, on the application site.

It is the case that the Exeter Core Strategy at Policy CP18 and the subordinate Monkerton Master Plan allocates for up to 1600 sq, (17,200 sq ft) of retail on this site to support day-to-day needs arising from the immediate locality. The scale of retail proposed at over 130,000 sq ft entirely dwarfs this threshold. In fact, while the applicant states that the overall scale of development proposed is less than the previous dismissed proposals, this overall reduction is relatively small, and A1 retail uses actually are greater: The proposals are contrary to Policy CP18.

5. Congestion And Air Quality

Stagecoach notes with concern that the proposals will by their nature introduce significant additional traffic movements into highways links and junctions that are already highly congested. We see inadequate evidence that this will not materially worsen traffic conditions especially at peak times, further eroding the efficiency, productivity, reliability (and by extension the relative attractiveness) of bus services in the immediate and wider area.

NPPF paragraph 32 makes clear only that when residual cumulative unmitigated impacts are “severe” should development be refused. However, this application forms just one of four applications for retail developments within 600m of the site, and without any evidence supplied of what the cumulative impacts of any breach of the current adopted policy to direct substantial retail and leisure uses into the City centre would be, we would say that the applicant has not demonstrated that the requirements of paragraph 32 have been satisfied.

If there were any doubt that the highways network in the locality is under pressure, the comments of the City Council's Air Quality Officer ought to give pause for very serious thought, The presence of pollution levels close to exceeding legal limits around the site is itself very strong evidence of congestion. The likelihood that additional traffic and additional congestion both will result from the scheme in and of itself gives serious grounds for the development to be refused, unless appropriate mitigation can be identified and delivered.

6. Conclusion

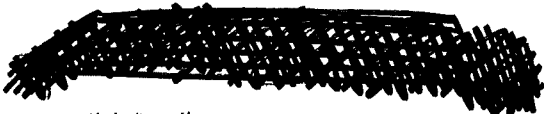
Section 38 (6) of the Planning and Compensation Act 2004 requires that development proposals must be determined in accordance with the policies in the statutory development plan unless material considerations indicate otherwise. As we outline above this major out-of-town retail development is contrary to paragraphs 14, 29, 32 and 35 of NPPF and at the very least, Policies CP8 and CP18 of the Exeter Core Strategy. We see little or no evidence to suggest that material circumstances are demonstrated that indicate that the development should be permitted out of conformity with those policies.

Rather, given the likely destabilisation of the established and committed retail hierarchy for the City and immediately adjacent areas within East Devon, and its traffic and pollution impacts this proposal represents unsustainable development.

We therefore respectfully urge the Council to refuse the application.

I trust that these comments can be considered appropriately and duly made, be considered in your decision taking, and be reported in due course to the Committee.

Yours sincerely



Nick Small
Head of Strategic Development and the Built Environment (South)