

# TravelWatch- **ISLE OF MAN**

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Representing and promoting the interests of Isle of Man Passengers

## Planning Application 18/00846/B

### ***Bus Station Development***

#### ***1. Introduction***

This objection to the above planning application is prepared on behalf of TravelWatch Isle of Man. A note about the organisation is attached at Appendix A. TravelWatch has no comment to make on the commercial developments proposed. Our sole concern is to ensure that facilities for Bus passengers included in the application are appropriate and adequate and comply with best practice.

#### ***1. Timing of Application***

TravelWatch note that this application is a very complex one with as many as 58 supporting documents. We regret that it was released during mid-August as we consider this may have deprived many of the opportunity to study the application and to make comments. The Planning Authority – at the least – should take a very open approach to consideration of any late comments that they receive on this important application

#### ***2. Background***

A Bus Station existed at Lord Street, Douglas for many years and provided facilities for passengers including:-

- Extensive weather protection
- Toilets
- Large passenger waiting room with heating
- Café/kiosk selling newspapers, magazines, food and beverages
- Vending machines
- Information

Towards the end of the twentieth century the Bus Station was taken out of use and demolished. In its place a number of Bus shelters were provided along Lord Street. These provided limited weather protection and information but no other facilities for bus passengers. This lack of a proper Bus interchange was highlighted in TravelWatch's submission to the 2008 Bus Review. Travelwatch considers that providing a modern Bus interchange in Douglas should be a high priority for Government.

Local politicians regularly claimed that facilities for bus passengers would be provided in any future redevelopment. Several projects were considered including moving the main bus stops to Victoria Street. No tangible progress was made and bus passengers have had to endure a disgraceful absence of facilities for decades.

### **3. A modern bus station**

A recent letter from the Minister at the DoI to TravelWatch about the current development includes the following claims:

*“The proposals incorporate all the elements expected of a modern bus station....the Department is satisfied that the developers’ proposals will cater for the needs of public transport users in Douglas for many years to come”.*

We do not agree.

TravelWatch Isle of Man consulted other UK passenger organisations to establish what standards should apply to new bus stations. Our attention was drawn to a document entitled “*Bus and Coach Station Design and Operation 2011*” – this was described as a “Best Practice Guide” according to the Department for Transport of the UK Government. Our attention was also drawn to the pamphlet “*Safer Bus Stations*” – a Guide from the British Parking Association.

Since the Lord Street Bus Station was demolished, considerable changes have taken place within the Island community impacting on Bus travel – for example the increased number of older persons as a result of longer life expectancy. There have been huge improvements in the rights of and provision for people with disabilities resulting in greater opportunities for more people with disabilities to travel. In the last ten years, the bus fleet has been modernised, the timetables improved and the number travelling by bus has increased. Isle of Man Government policy is to reduce the use of private cars and buses are an important alternative.

TravelWatch has sought evidence from the planning application that the advice in the 2011 UK best practice guide to “Bus and Coach Design and Operation” had been properly considered. We found none.

### **4. Key issues that the application should cover**

We consider that the application should have included details of the proposed new bus stands/ shelters on Lord Street as these are an important element of the “bus station” element of this planning application.

Other facilities should include:-

- Adequate waiting areas – of an appropriate size to accommodate passengers; sufficient seating and appropriate heating and ventilation.
- Information and help points for services and ticketing
- Adequate number of free Toilets – including baby changing facilities
- Adequate security - CCTV

- Refreshments
- Adequate lighting
- Sufficient canopies/shelters to provide adequate weather protection.
- All Facilities must be suitable for passengers with disabilities
- Particular account should be taken of the need to accommodate pushchairs/buggies and wheelchairs.
- Adequate space for servicing all passenger facilities which will require regular cleaning and maintenance.
- Waiting and toilet areas for passengers should be at least comparable in space and other standards with those provided for bus Staff.

### **5. Passenger numbers**

In order to assess the requirement for passenger facilities, evidence is required of the number of passengers using the existing Lord Street Bus stops including those with any form of special need or disability. We saw no evidence of this in the planning application. Only when that information is collected, can estimates be made of passenger requirements. But account must be taken of the inadequacy of the present arrangements for bus passengers on Lord Street – any improvement on the present woeful facilities will undoubtedly generate additional usage. This needs to be factored in to any estimates of the numbers the new facilities have to cater for.

These facilities have been designed according to DoI to “cater for bus passengers for many years to come”. Accordingly, given the Government plans to expand the population and to encourage a greater use of public transport, these facilities must be designed to cope with such expansion. Contingencies for expanding the facilities should be built into the plans.

Account also needs to be taken of:-

- future trends – including tourism.
- peaks in demand for travel and
- the very variable weather conditions on the Island which require adequate shelter from wind and rain especially for vulnerable and less mobile passengers. Thus canopies and other forms of weather protection need to be continuous to allow passengers to move under adequate cover from the waiting/toilets and information areas to the bus stands

### **6. Conclusion**

We recommend that the Planning authorities require the application to be reworked in the light of the 2011 UK best practice guide, updated as necessary to take account of more recent developments.