

Submission to the LDF Panel by Lympstone Parish Council 11th October 2011

Item:- Villages and Rural Areas Development

During recent months we have listened with interest to presentations made by potential developers and our neighbours regarding potential development within West EDDC. Lympstone Parish Council (LPC) would like to take this opportunity to present our own views to The Panel and in doing so correct some misrepresentations or misunderstandings that have occurred.

In our original submission we presented 5 Key High Level Statements:-

1. We believe that the history and heritage of our parish are fundamental to its character, very important to its present attractiveness, and of critical importance to the future development of the parish. We do not see this position as leading to 'fossilisation', but the historic core of the village must be protected, whilst change must be well managed and cautious. We do not wish to stifle innovative design which has its place in the evolution of the parish. The protection must be both building specific, with the listing of individual properties, and more general, particularly through Conservation Area designation and the Village Design Statement. The Conservation Area should be extended to encompass the setting of the village core.
2. The character of Lympstone is one of a discrete settlement; coalescence with Exmouth is a constant threat. The preservation of the 'Green Wedge', 'Estuary Protection Zone' and 'Area of Great Landscape Value' designations between Lympstone and Exmouth are of great importance in meeting this threat. These designations must be retained within any future (LDF) structure planning.
3. There is a need for the Parish to make available more land for limited development and incorporate affordable housing. This will require the current building boundary line around the centre of the village to be extended. This will be done only within the parameters set by the aforementioned designations.
4. The A376 is a traffic corridor connecting Exmouth to Exeter and cuts through the centre of the parish. The road is inadequate for existing traffic flows. As increasing pedestrian safety measures are introduced so journey times increase. The extension to Dinan Way down to the A376 will merely bring traffic to the rear of the queue to Exeter quicker. With the proposed new housing in Exmouth a new relief road is a pre-requisite and must be completed before any such development is commenced. Relying on an improved public transport service is not an option.
5. The parish is a sustainable community. The public transport infrastructure exists for improvement, the community is vibrant and environmentally aware and there are a minimum standard of shops and businesses on which to develop. The parish is giving consideration to becoming energy self sustainable with a low to zero carbon footprint.

For the purpose of this paper we would like to concentrate on numbers 3 and 4.

Often during presentations to the LDF we have heard comments akin to "*we have heard what you don't want – what do you want?*" - we recognise this frustration and in this paper attempt to present a positive and contributory approach.

Development within Central Lymstone.

- a) A recently completed and published Housing Needs Survey for Lymstone has identified a local need for 11 houses over the next 5 years. LPC accept this requirement without question and will work with EDDC to achieve this objective.
- b) LPC understands the requirement placed on EDDC by Government dictate to provide land for a substantial build programme over the next 5 years. LPC accepts its responsibility to contribute to this programme. As a "hub community" current numbers suggested by The Panel are 50 dwellings. LPC accept this figure and would be prepared to accept a further 20% increase should this be considered necessary by The Panel.
- c) Without the benefit of a Neighbourhood Plan we cannot formally identify to The Panel the locations of these 50/60 houses, however a quick and dirty top down approach would lead us to believe that the majority, if not all, of this development could be accommodated within the existing building boundary line.
- d) The Lymstone Parish Plan set the principle that any development "*at the extremities of the Parish and disconnected from the central settlement*" should be resisted. Furthermore it proposed a "*review of the planning boundary to allow limited development*".
- e) LPC believe that these objectives are realistic, achievable and most importantly are in accord with the aspirations of EDDC and the Lymstone Community.

Development within the remainder of Lymstone Parish.

- a) As stated in d) above The Lymstone Parish Plan set the principle that any development "*at the extremities of the Parish and disconnected from the central settlement*" should be resisted. This to ensure the independence yet sustainability of the Lymstone Community.
- b) Within the LDF process two prospective developments "*Goodmores Farm*" and "*Land at Marley Road, adjoining Goodmores Farm*" have been presented to The Panel. These have both been presented as Exmouth developments. Whilst indeed Exmouth is the beneficiary, LPC would wish to point out to The Panel that a substantial quantity – even the majority – of the land at these locations is within Lymstone Parish.
- c) LPC believe that this "*joint stewardship*" of these lands needs special treatment within the LDF process. This process would require the joint agreement of LPC and Exmouth Town Council in producing a harmonious outcome.
- d) Without a Neighbourhood Plan or any other formal consensus LPC have no mandate from the Lymstone Community – apart from the Parish Plan – to constructively move this forward.

The Dinan Way Extension and the A376.

- i. The LDF Issues and Options Report and the Exmouth Town Council Report (presented to The Panel on 6th September) both refer to the Extension of Dinan Way to the A376. It is referred to as a "*prerequisite*". LPC would challenge this assumption. Furthermore LPC would wish to point out that the Dinan Way Extension is part of Lymstone Parish and not Exmouth.
- ii. Item 4. above gives our response within the context of the LDF.
- iii. The Dinan Way Extension was first proposed in conjunction with a proposal to upgrade or replace the A376 between Exmouth and Clyst St. George. Its function at that time was to take traffic from the A376 at Courtlands Cross up to a new link road at Exe View. It was never intended to be part of an "*Exmouth By-Pass*" taking traffic from Salterton Road to the A376.

- iv. Representation has been made to Devon County Council regarding the A376 (attached – dated March 2009) and it was agreed at that time by Karim Hassan that a complete review of the A376 and an associated relief road would be incorporated into the LDF. We would contend that this has not taken place within the LDF.
- v. LPC do not currently support the Dinan Way Extension.
- vi. LPC would wish to see further work carried out to;
 - a. Review the need for a A376 relief road to support the expansion of Exmouth
 - b. Review the necessity, adequacy and viability of The Dinan Way Extension.

I trust you will factor the above comments into your deliberations and I would welcome the opportunity to speak to The Panel on 11th October.

Cllr. Rob Longhurst
Lympstone Parish Council
4th October 2011



NOW EVEN **GREATER NEED FOR** **ACTION**

Traffic congestion on the A376 is currently a major issue. Further housing, retail and industrial development in Exmouth cannot be allowed to commence without a solution to the communication infrastructure in the Exeter to Exmouth Corridor. DCC must reopen the consultation exercise with a view to solving this problem.

1. INTRODUCTION

In 1987 Devon County Council took the first positive step to bring into the forward road building programme a new road to relieve the present inadequate route from Exeter (Clyst St. George) to Exmouth.

Reports to, and decisions by, the Planning and Transportation Committee at that time indicated that the needs of this route were recognised at County level.

In July 1988 DCC held a consultation exercise with exhibitions in Exton, Lymptstone, Woodbury and 3 in Exmouth. As a result of this exercise two routes, known as the blue and the red/yellow emerged as the favourites. This reflected the extremely strong views in East Devon and in the Exmouth catchment area particularly that this was addressing an overriding need.

In 1995 as part of DCC's review of highway proposals this scheme was abandoned.

In October 2007 Ian Harrison following a meeting with the EDDC Scrutiny Committee provided a statement of DCC's position with regard to the Exeter to Exmouth Corridor.

The County Council has no proposals to significantly increase capacity of the A376 route between Clyst St George and Exmouth, or to improve the alternative across Woodbury Common and through Woodbury village.

"In the 1980s the County Council adopted a dual carriageway proposal for a new route running south from Clyst St George, parallel to the A376, and terminating south of Summer Lane with links back to the existing A376 corridor and to Hulham Road, at Dinan Way. However, in 1995, as part of the County Council's review of highway proposals in relation to sustainable transport policies, this scheme was abandoned. It was replaced by a link to complete Dinan Way from Hulham Road through to the A376. Consultation was mounted at the time into two possible alignments for this link, but that consultation was inconclusive, and no firm decision was made on the route.

Given the imbalance between housing and employment in Exmouth, there is a strong likelihood that a significant increase in capacity of the highway network would lead to a corresponding increase in traffic. The emphasis of the County Council is therefore to concentrate on improving sustainable transport links between Exeter and Exmouth, through provision of the Exe estuary cycle route, improvements to the rail service and stations, and enhanced facilities for bus passengers.

Significant progress is being made in this regard, including construction during the current financial year of the first section of the Exe estuary cycle route, from Exmouth to Lypstone.” Ian Harrison

Since 2007 EDDC have launched the Regional Spatial Strategy and the Local Development Framework. Within these initiatives are targets for new house builds across E Devon. The likely increase in housing in Exmouth is put in the region of 3,000 new homes. No provision is being made to upgrade the A376 and DCC's position is still as stated by Ian Harrison above.

At the time of the initial consultation process in 1988/9 the local parishes and Exmouth Town formed an "A376 Action Group" to support the building of a relief road. Last year this group was reformed. The Action Group contend:

- 1) That the decision to abandon the A376 relief scheme in 1989 was mistaken
- 2) Traffic flow projections at that time have proved to be lower than actual flows
- 3) The existing A376 is already inadequate for the traffic that it carries
- 4) The projected increase in housing in Exmouth within the LDF cannot be supported by the existing A376 and its tributary routes
- 5) The sustainable transport option referred to by Ian Harrison in his statement is laudable but will not on its own cater for the new projected population growth in Exmouth.
- 6) A solution to the communication infrastructure in the Exeter to Exmouth Corridor (The Corridor) is required as a matter of urgency.

This paper brings together the arguments supporting these statements.

2. EXISTING ROAD CHARACTERISTICS (1988)¹

The County Engineer and Planning Officer reported in February 1987 (EP/87/85), April 1987 (EP/87/198) and February 1988 (EP/88/69) on the very sub-standard nature of the A376 and made proposals for the subsequent consultation exercise. His statements made the following points:-

- 2.1 The present road is the third busiest commuter route in Devon.**
 - A380 October Average 24200 12hr weekday traffic flow
 - A386 October Average 13500 12hr weekday traffic flow
 - A376 October Average 12600 12hr weekday traffic flow

- 2.2 Daily traffic flow (August) totals 19000 vehicles.**
 - The -annual average traffic flow on the A376 is some 15,000 vehicles per day with a peak August daily flow of 19,000 vehicles. Heavy goods vehicles make up 5% of the A376 traffic

- 2.3 Twenty Four Percent of the road length has less than the minimum recommended width.**
 - The carriageway is generally 7.3 metres wide, but over 24% of its length it is below that width with a minimum width of 5.5 metres

- 2.3 Thirty Six Percent of the road length has less than the minimum forward visibility relative to traffic speed.**
 - 36% of the route falls below the recommended minimum stopping site distance relative to the speed at which traffic might be expected to travel (i.e. 40 mph in controlled zones and 50 mph outside the speed limit)

- 2.4 The injury accident rate is twenty percent greater than other comparable routes.**
 - Between 1982 and 1986, there have been 101 personal injury accidents on this route, of which three were fatalities. In addition, 67 damage only accidents were reported. The injury accident rate at 0.61 per million vehicle kilometres is higher than the average rate of 0.5 for rural principal roads.

- 2.5 The present peak traffic flow is twenty five percent greater than the design capacity for a full standard carriageway.**
 - The annual average traffic flow is predicted to rise to 20,000 vehicles per day by 2011, although this increase might be mitigated by a greater transfer to the alternative route via B3179 and B3180 over Woodbury Common. This traffic demand is well in excess of the economic design capacity of 16,000 vehicles per day for a full standard single carriageway road with restricted access.

Comments

- 2.2** Despite the closure of Exmouth docks HGVs still make up 5% of the traffic.
- 2.3** Since 1988 the whole A376 has been regulated to 40mph or less.
- 2.5** The projection of a traffic flow of 20,000 by 2011 has proved to be very conservative with an annual flow of 24,000 being attributed to parts of the A376 in 2004²

¹ February 1987 (EP/87/85), April 1987 (EP/87/198) & February 1988 (EP/88/69)

² Devon Local Transport Plan 2006-2011

3. EXISTING ROAD CHARACTERISTICS (2009)

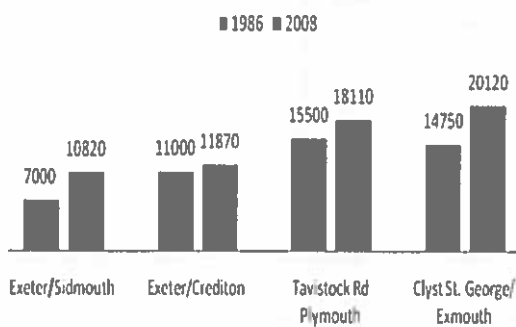
3.1 Commuter Routes into Exeter

- The A376 is the 3rd busiest commuter route into Exeter and the busiest local route. From Clyst St. Mary roundabout to Sandygate the flow is over 30,000 vehicles a day. Redirecting traffic to the A3052 is not an option.

Principal Commuter Routes into Exeter³

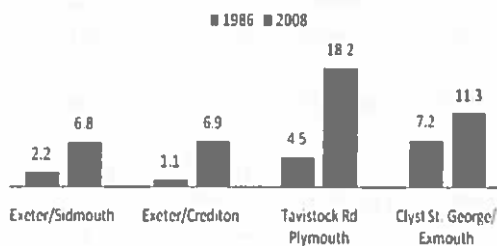
Name/Location	Annual Average 24-hr day flow 2003
A38 Kennford	72,540
A379 Bridge Road	33,620
A376 Ebford (prev George & Dragon)	20,120
A377 Half Moon (prev Cowley & Newbridge)	12,040
A3052 Farringdon (prev E. Cat & Fiddle)	10,400
A379 Exminster	9,710
B3181 Broadclyst	9,560
A396 Rewe	6,340

Traffic Flow - Annual Daily Average



- Current vs Historic traffic flows across Devon show the A376 to continue be one of the most heavily trafficked routes with growth outstripping other routes

Accidents per kilometre



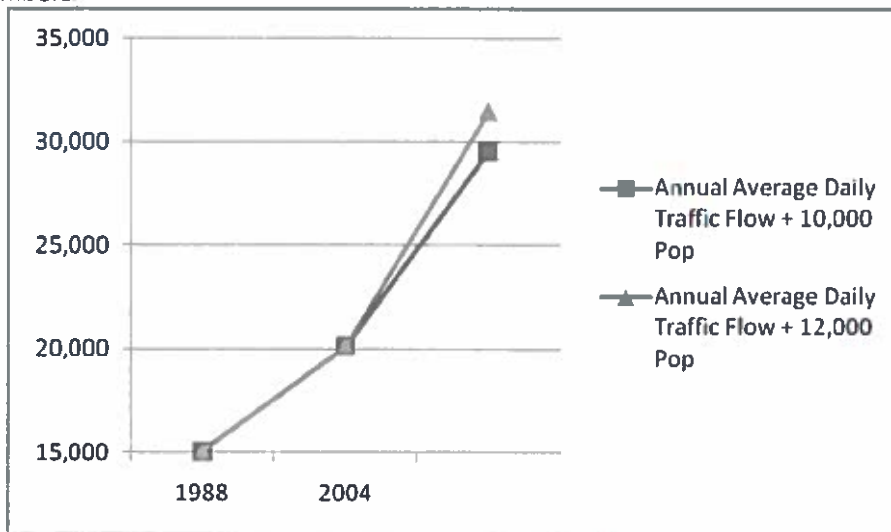
- The A376 has traditionally had a high accident rate (see 2.4 above). This has not changed over the years. Merely getting worse as the road gets busier.

³ Road Transport and Casualty Statistics for Devon 2004

4. FUTURE PROJECTIONS

- From 1988 to 2004 the Annual Average Traffic Flow on the A376 has grown from 15,000 to 20,120 vehicles daily.
- From 1998 to 2004 the population of Exmouth Parish has grown from 30,000 to 35,430.
- The LDF proposals for East Devon indicate 3,000 new houses for Exmouth plus continued infill on brownfield sites. This must equate with a population increase of over 10,000 people (more like 12,000).

Given this data it is possible to project the consequent traffic flow associated with these increased housing numbers.



The resultant traffic flow is a 46% increase to 29,549 vehicles per day. If the population increases by 12,000, which is not unrealistic, then the resultant traffic flow would be 31,435 vehicles per day.

Additionally:-

- All the development would be to the East/North East of Exmouth – this would be bound to have consequences on the traffic flows through Woodbury Village, Wotton Lane, Summer Lane and Brixington.
- The Dinan Way extension is not a remedy – it will merely get the traffic to the end of the A376 queue quicker
- The A376 queue now starts at the Marine Camp – in future is it to start at The Saddlers?
- Increased pedestrian safety measures currently being installed on the A376 are to be welcomed for the benefit of parishioners en route – they will however exacerbate the congestion problem. The need is to remove the traffic altogether – diverting via Woodbury or the A3052 are not acceptable options.
- Public transport (train and bus) will alleviate the problem – but will not solve it – not all commuters want to go to the centre of Exeter or are able to use public transport.

The A376 is overcrowded and congested now and exceeds the design capacity. In future it will be worse with traffic flows twice the design capacity – the existing road will not be adequate – a solution must be found.

5. CURRENT STRATEGIC PLANS⁴

"Adopted East Devon Local Plan – 2006. Chapter 2 – Local Plan Strategy - Infrastructure related to new development" covers our view on the need for The Corridor problem to be solved prior to development in Exmouth. The following are the relevant sections:

2.54 It has always been an important purpose of the planning system to co-ordinate new development with the infrastructure it requires. This Local Plan takes account of infrastructure provision and guides new development to areas where such provision is most readily available or will be made available through the provisions of this Local Plan. New developments must make proper provision to be served by and provide for necessary infrastructure required as a direct consequence of the proposal; this is recognised in Devon Structure Plan Policy ST4. The costs of such infrastructure where necessary for a development scheme to go ahead (unless a programmed commitment to provision exists from another party) will need to be borne by the development concerned. The provision will need to be made on site, off site or by way of financial contribution towards providing facilities elsewhere as appropriate. Such requirements may include highway improvements (including pedestrian or cycling facilities), provision for public transport, water supply, drainage and sewers, flood prevention or alleviation, provision of public open space, playing fields and children's play facilities. They may also include provision of social infrastructure including sites for education, recreation, built sport facilities, community facilities, places of worship and health services and the provision of the utility services - water, electricity and gas supplies, telecommunications and facilities to dispose of sewage and surface water.

2.55 The Council supports Policy ST4 of the Devon Structure Plan which states that proposals for new development should not normally be permitted unless the capital works directly required to serve it have been, or will be, provided. Where new facilities are provided these will be required as development proceeds. Consequently, future development will only be acceptable once the Council is satisfied that the level of infrastructure provision is, or will be, adequate. This will be particularly important in relation to the strategic developments outlined in Policy S1 and which are dealt with in Chapter 12 of the Local Plan. For larger scale development it will be important for infrastructure provision to be provided on a phased basis to accord with the phases of works being undertaken.

These policies make it quite clear that the necessary infrastructure must accompany any development.

Policy S7 (Infrastructure Related to New Development)

Development proposals that require infrastructure should include provision to ensure that:

- 1. Those infrastructure requirements that arise as a direct consequence of the development are met in full serving the needs and demands that will be generated by that development.**

⁴ Adopted East Devon Local Plan – 2006. Chapter 2 – Local Plan Strategy

6. THE URGENT NEED

The statistics of traffic volume, density and reported accidents show in tangible form the measurable criteria and the "Need For Action".

In a comparison with other similar routes the traffic density is greater than that for similar principal rural roads. The combination of sub-standard road characteristics and traffic density inevitably produce the highest incidence of accidents.

The towns and villages east of the Exe Estuary are serviced by two very sub-standard roads, the A376 (Clyst St. George – Exmouth) and the B3179 (Exmouth – Woodbury – Clyst St. George). The principal centres, Exeter (business and work) and Exmouth (housing and accommodation), have experienced rapid expansion over the past forty years with increasing demands on the road infrastructure.

"There has been significant housing growth (in Exmouth) over the last 20 years but limited growth in employment. A high proportion of the population work in Exeter"⁵

The smaller towns and villages like Budleigh Salterton, Woodbury, Lypstone, Exton and Ebford, add to the demands in their continuing expansion but also they suffer disproportionately at an environmental level from the pressures created by the overloaded and primitive road system.

SkyPark, the Clyst St. Mary Business Park and the Digby Retail Centre, together with other out of town business and leisure developments will significantly add to the current problems and hazards as they will attract traffic from Exmouth. The present A376 remains the major artery from Exmouth to Exeter and the M5 Motorway; with these new demands on The Corridor infra-structure being made every year it is imperative that this problem is tackled head on.

The questions posed by this changing and escalating situation should be addressed now and must be resolved promptly and urgently.

Traffic congestion on the A376 is currently a major issue. Further housing, retail and industrial development in Exmouth cannot be allowed to commence without a solution to the communication infrastructure in the Exeter to Exmouth Corridor. DCC must reopen the consultation exercise with a view to solving this problem.

⁵ Devon Local Transport Plan 2006-2011

Lympstone Landowners Association

East Devon District Council

27th July 2011

Subject: LOCAL DEVELOPMENT FRAMEWORK PANEL

The Lympstone Landowners Association was formed in 2002

Our aim is to put forward planning proposals that we feel confident in and that they would not be rejected and kicked into the long grass,

The key issues challenge the situation that has prevailed for decades in the villages of East Devon. We have seen the lack of adequate and appropriate housing to meet the needs of local village families that have roots for three and four generations. These young people have little hope of a home of their own being subject to the combined constraints of low wages, ever more restricted access to borrowing (if available at all) and no local authority housing developments to rent.

The aim of our association is to promote homes on the many small plots of land in and around the parish that can be developed on a small scale with no detriment to the village charm and tranquility that is enjoyed by us all.

Additionally, small scale developments of properties suitable for retirement accommodation on these plots could free up larger properties for younger family use. We need this younger generation for the future of the community as our villages have seen a growing proportion of properties bought and occupied by retired persons.

Our members seek fair consideration for the future and not to be sidelined in favour of large developments with the inevitable pressures they are able to bring to bear on local planners.

It would seem Exmouth is over-subscribed with development in the plan. Our proposals are in keeping with the aim of the village plan that has been presented to and adopted by EDDC. I urge you to consider small scale and sympathetic developments as a serious and attractive option that should remain a part of the District's approach to satisfying our overall development needs.

Yours sincerely,

Richard Eastley

Chairman

Lympstone Landowners Association