



15th January 2023

**The Planning Officer
East Devon District Council**

Response to the Draft Local Plan – Reference sites LP_Brcl_29 and LP_Brcl_12

I would first want to say that we fully support the objectives of this policy for the Clyst Valley Regional Park asset set out under 5.49.

The two developments in Broadclyst being at Brcl_12 and Brcl-29 are unsustainable in my view as more fully set out below..

SCHOOLS

Both the primary and the secondary school are full and have no places available. And certainly, the primary school has no land for further development. So it is currently unsustainable to expect these schools to pick up any new pupils that will arise from the developments.

ROADS

- The road network cannot support the current level of traffic in and around the primary school and the secondary school. There are lengthy traffic queues already at both ends of the village at drop off and pick off times. So much so that traffic backs up on the main B3181 passing through the village (queues of 20 plus cars on this main road). The single country lanes around the village are already subject to exceptional levels of traffic which they are not able to cope with - especially the lanes going out to Cranbrook, around Burrow Farm and going up to Ashclyst forest.
- There is exceptional traffic on Station road currently around the Clyst Vale school and where it narrows next to the Methodist chapel to be a one car width road when cars are parked alongside it or pupils walking to school. In addition, you have the 890 children already attending Clyst Vale school mingling with the cars and the traffic especially those who come by bus and have no alternative but to walk along Old Station Road or along Old Coach Road to get to school.
- The main route out of both developments will be along the Whimple Road and onto the junction with Station Road and then on the B3181 towards Exeter. Some traffic will also want to use the Old Coach Road to access the B3181 and this is a residential road with only one car's width passing and is already subject to excess traffic queues at peak times.
- Brcl_29 residents will need to access onto Townend road which is a single lane road with very high Devon banks on both sides of the road. Unless the banks are removed or flattened, the road will be inaccessible. It will also need to be broadened to allow two way traffic. Any traffic that it generates can go south onto Whimple Road and will inevitably head towards the B3181 and contribute to the traffic chaos that already exists on Station Road and Old Coach Road. Or they go north along Townend and contribute to the existing chaos on Townhill road at various times of the day.
- So the position is that the developments are unsustainable with the current road Infrastructure.

PATHS

There is currently a path leading from the bus stop on the B3181 to Dog Village and Clyst Vale School. It goes through the small orchard which is the triangle between Station Road, the B3181 and Slaparse lane. It discharges its pedestrians onto Station Road at a pinch point in the road next to the Methodist chapel. Students of Clyst Vale catch the bus and use the path.

More traffic coming from the developments is unsustainable as this point in Station road and it would become a serious hazard to the pedestrians. Widening the road would need to occur to provide safe passage but there are houses on either side.

Similarly Old Coach Road would need serious improvement to avoid accidents with pupils/pedestrians at peak times as the layout (one cars width with parked cars) will be unsustainable with the extra traffic from the new developments

The existing footpath network is extensively used by the 1,500 odd residents of the village and some already flood in winter. Adding new residents on the scale anticipated would mean that the existing paths are unsustainable and they would need widening and improving.

BUSES

It is anticipated in the draft planning report that some of the new residents will commute into Exeter. The Buses are already full and it is currently unsustainable to add new residents to the service. Current students who live in Broadclyst can't get to Exeter college in time for lessons currently due to overcrowding on the buses.

TRAINS

Alex Bullock, Grass Roots Planning representing Land Value Alliances (LVA) noted in his presentation to the Planning Committee on Brcl_12 that "The Cranbrook train station is located circa 3km to the south of the site".

There are 2 routes by car and measured by Google they are 5.3 or 6.0 kilometres long. Alex Bullock is referencing a route "as the crow flies".

The first route goes via Station Road and I would mention the traffic challenges that I have already referred to on Station Road plus there will be the challenges of getting across the railway bridge at Broadclyst station which can become congested with the lorry traffic.

And then there is the road flooding on Station road next to the community farm as well as the flooding on the valley next to Wishford farm to contend with.

The second route goes via the back route using single country lanes that go across the railway line at Crannaforde crossing. This single lane road is hazardous already with Cranbrook traffic and will be likely to get worse with any new developments.

It is unsustainable to expect commuters from BRCL_12 and BRCL_29 to use these routes for traveling to the train by car.

Currently you would also need to use the same routes to walk to the station which would take an hour and 15 minutes and with no continuous pavement would be dangerous, especially in winter.

Finally, if there were substantial use of the Crannaforde railway crossing from the developments, then there would need to be an upgrade of the crossing to be the same standard as the Pinhoe crossing.

FLOODING, THE WATER TABLE AND BIODIVERSITY

Flooding in the village is on the increase due to the speed and volume of the water that passes through the valley catchment area. Poor soil percolation properties and the speed of run off from this site already contribute to flooding and this would be

exacerbated by any hard landscaping consistent with development

The River Clyst already floods at various times in the year and this impacts the road and surrounding buildings on the triangle between Burrow Road and the road leading to Burrow Farm. This road becomes impassable.

The Fields in the development at Brcl_12 currently drain into the river at the point noted above where it floods.

The fields currently act as a sponge/floodwater plain and soak up a significant amount of water. And consequently the water table is very high in the fields currently (especially opposite the New Inn).

It is unsustainable to expect the water flowing from the development of such a large number of properties to drain into the river at this point.

(Photographs and a Video are attached to emphasise this point).

There is an abundance of wildlife that enjoy the impact of the high water table especially the invertebrates and the birds. And there would need to be serious mitigation if the development were to go ahead.

SEWERAGE

The Broadclyst (Side) Pumping Station (South West Water) - Permit number: 201639 - In 2021. This sewer storm overflow spilled 14 times for a total of 18 hours, discharging into the River Clyst Valley via sws. So the current sewerage system is not working well enough and any new development would be unsustainable without a very significant improvement in the sewerage and drainage pumping and treatment systems.

GP SURGERY

The Pinhoe and Broadclyst Medical service is at full capacity according to the Doctor that we use there as a consequence of the Cranbrook & Westclyst residents signing up. Adding extra patients from the developments in Broadclyst is unsustainable without a significant investment in new facilities and medical staff.

HERITAGE

Lake House is a Grade 2 listed building and would be impacted by Brcl_29 being adjacent to it.

PLAY AREA AND SPORTS FACILITIES

There is one football field and one childrens' play area in the village currently which are extensively used. Adding 175 homes to the existing 875 homes is a 20% increase. It would be unsustainable to expect the one pitch and play area to be able to cope with the influx of new residents.

USE OF GRADE 1 AGRICULTURAL LAND

One of the fields in development Brcl_12 is currently used for market gardening and supports a very wide range of horticultural crops including salad crops and winter harvested vegetables. It is Grade 1 excellent Quality Agricultural Land. And as such it should not normally be put forward for Housing development.

EMPLOYMENT LAND

Within the draft policy, it states that *"At tier 3 and 4 settlements or development in the countryside*

whether on allocated sites or windfall sites we will apply a threshold of 25 homes. - We will require at

least 0.1 hectares of employment land for each 25 homes proposed (with this ratio of provision applied on a pro-rata basis and applying for any homes numbering over 25)."

The policy is good in that it promotes work close to home and is much better than the commuting into Exeter that is otherwise expected.

It is noted in the draft plan at point 6.66 that " The village currently has approximately one job for every 2 residents of working age and unsurprisingly, a large number of residents commute into Exeter given its proximity. Whilst this will likely remain an attractive option, if it is considered a reasonable approach to accommodate strategic scale development it will be important for an element of this to be for employment uses, to discourage out commuting where possible"

In following the policy, the three developments in Broadclyst would need to come with 0.7 hectares of employment land. There appears to be no provision for this land within the three developments and there is no solution provided in the draft plan.

SCALE OF DEVELOPMENT APPROPRIATE TO THE VILLAGE

It is noted that there might be some proper challenge in the planning committee minutes on the scale of some of the developments in the Tier 3 and Tier 4 centres. The scale of these two developments in Broadclyst would certainly fall under that heading.

Yours sincerely,

James and Sarah Gaisford

Video and photos sent via Document submission