

Filtered Data Export

**Full name:** Andrew McKeon

**Organisation (where relevant):** EXETER CIVIC SOCIETY

**Other party name (if relevant):** -

**Proposal:** 4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**2. Do you consider that this part of the Development at the West End chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** -

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:** Exeter Civic Society objects to the proposed allocation of land for a new community in East Devon and at Exmouth and Topsham on the grounds that the implications for the road network and infrastructure development have not been properly considered and the plan is therefore unsound in respect of these proposals.

We are making this objection because of the levels of the current levels of congestion on roads in Exeter at peak times, and the increasing number of vehicles on the Strategic Road Network around the city. In addition, it is clear from current traffic movements that there is already a significant increase in traffic leaving and returning to the city at peak times to workplaces outside of the city; possibly at Skypark, Hill Barton and Greendale Industrial Parks. We expect this trend to continue.

It is unsound because:

The assessment of transport impacts was modelled on a previous draft plan. The updated modelling in December 2024 noted that the final plan may be different. It is indeed, with increases of 25% for the new town albeit over a longer timescale and of 30% for Exmouth. These

will have a significant impact and should be modelled and considered before the plan is finalised and considered sound.

The updated December 2024 modelling notes:

‘In 2040 many of the junctions in Exeter show an increased V/C ratio due to higher traffic flows on the network. There are some junctions which were already over-capacity in 2017 and/or 2030 and remain so in the future years, but others which were below capacity and now have at least one turn that is over-capacity. For example, several SRN junctions between the A30 airport junction, M5 J29 and M5 J30 had worst turn V/C ratios below 95% in 2030 that go over 95% in 2040. Junctions that were already over-capacity in 2030 and get worse in 2040 include Clyst St Mary roundabout, Clyst St George roundabout, and the A38 northbound approach to M5 J31.’

The further housing development proposed will exacerbate this but no assessment has been made.

Prime access to the North of Topsham site will be along Clyst Road. This is a narrow road with a traffic light controlled junction to the A376 near to J30 of the M5. The plan suggests making a cycle route and/or a bus route along it but the feasibility and cost of doing so needs to be assessed first before the allocation can be made as local knowledge suggests the likelihood of doing so is negligible. Strategic Policy WS10 proposes that EDDC and Exeter City Council will work jointly on infrastructure and traffic mitigation matters, specifically in relation to the M5 J 30 roundabout. It is not clear whether this includes the Clyst Road/A376 junction, but that should specifically be referenced and included in the policy. Also, there is no reference to changes to the junction in the Infrastructure Delivery Plan. They need to be included as Priority 1.

The A376 from Exmouth to Exeter is known to be heavily congested at peak times - a point made by Devon County Council in earlier consultations. This has been omitted from the S19 version of the plan but is even more relevant given the extra housing proposed. There is little practical prospect of a bus priority route, given the nature of the A376 from the town to the M5 and Exeter, passing through many villages including the congested roads within Topsham. There are no proposals to improve the railway line other than enhancements to specific stations.

Devon County Council’s November 2020 Exeter Transport Strategy is now over five years old and is half way through. It cannot be considered reliable evidence at this point without updating and going further to 2035 or beyond. A number of the schemes listed as completed by March 2025 have been significantly reduced in scope because of public objections, so their likely impact is much reduced. Given the track record in significantly modifying and reducing the impact of such schemes in light of public opinion, the proposed future schemes and their mitigating effect need to be reassessed for the plan to be sound.

The November 2020 Transport Strategy notes that much of the impact of additional traffic in and on Exeter has been effectively absorbed by Exeter residents changing their travel habits (Para 3.3). There is diminishing scope for this. 80% of commuting journeys from towns outside Exeter are by car, from rural areas it is 90%. It also notes that ‘existing (i.e. 2020) transport networks [are] already at capacity in peak periods’ (Para 3.20) It notes but makes no specific assessment of the impact of Cranbrook, other than that it will grow to the size of Tiverton, and its highways will become congested. Better quantification of travel habits and impact of Cranbrook residents would better inform the S19 Plan and its soundness. The proposed new town (and to a lesser extent the other housing developments down the Exe Estuary and including Exmouth) might reasonably be expected to have similar impacts to Cranbrook. The empirical data informing the

strategy is also over 7 years old and indeed makes use of the 2011 census which has been superseded by the 2021 census. It is therefore unreliable and unsound to base a plan on such out-of-date data. The impact of Cranbrook and of the proposed developments on Exeter to be reassessed using more up-to-date data before the plan is approved.

The Infrastructure Delivery Plan includes significant rail developments to make EDDC's S19 plan workable in respect of sustainable travel and its likely impact on the road network and Exeter. However, there are no costings or commitment from Network Rail. It is unclear where these proposed developments stand and whether they now feature in Network Rail's business plans. This needs to be clarified positively before the plan can be considered sound.

The WSP Mitigation Modelling dated 9 December 2024 cites the possibility of four P&R sites, and whilst that at Peamore has planning approval, those at Markham and EDNC North and EDNC South have not been consulted upon. Indeed, the proposal by the highway authority for a P&R site at the A30 Ide interchange has previously been proposed by them but did not succeed because of public objection and an inability to demonstrate that a bus link would be effective on the already congested Alphington Road. As for the two proposed in East Devon, the EDNC South site is unlikely to be effective at peak times because the A3052 and Clyst St Mary roundabout are already congested.

Although improvements for the highway at the A3052/A376 roundabout is highlighted in chapter 11 of The Plan, the Infrastructure Delivery Plan does not include any works to improve this route to the M5/Exeter.

The Infrastructure Delivery Plan also includes significant development by South West Water (SWW) on a new sewage treatment plant for the new town and development of the one at Countess Wear. Since the IDP was prepared Ofwat has determined a significantly lower price increase to support SWW's business plan than the company sought. The continued inclusion of these items in SWW's business plan needs to be settled before EDDC's own plan and the allocations it provides can be approved.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -**

**4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes**

**4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.: -**

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**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)**

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** The transport and traffic consequences of the proposals at the West End (and Exmouth) are very significant, have been inadequately considered and deserve greater analysis and assessment.

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**Organisation (where relevant):** EXETER CIVIC SOCIETY

**Other party name (if relevant):** -

**Proposal:** 4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS10

**2. Do you consider that this part of the Development at the West End chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:** -

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**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

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**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:** Exeter Civic Society objects to the proposed allocation of land for a new community in East Devon and at Exmouth and Topsham on the grounds that the implications for the road network and infrastructure development have not been properly considered and the plan is therefore unsound in respect of these proposals.

We are making this objection because of the levels of the current levels of congestion on roads in Exeter at peak times, and the increasing number of vehicles on the Strategic Road Network around the city. In addition, it is clear from current traffic movements that there is already a significant increase in traffic leaving and returning to the city at peak times to workplaces outside of the city; possibly at Skypark, Hill Barton and Greendale Industrial Parks. We expect this trend to continue.

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Prime access to the North of Topsham site will be along Clyst Road. This is a narrow road with a traffic light controlled junction to the A376 near to J30 of the M5. The plan suggests making a cycle route and/or a bus route along it but the feasibility and cost of doing so needs to be assessed first before the allocation can be made as local knowledge suggests the likelihood of doing so is negligible. Strategic Policy WS10 proposes that EDDC and Exeter City Council will work jointly on infrastructure and traffic mitigation matters, specifically in relation to the M5 J 30 roundabout. It is not clear whether this includes the Clyst Road/A376 junction, but that should specifically be referenced and included in the policy. Also, there is no reference to changes to the junction in the Infrastructure Delivery Plan. They need to be included as Priority 1.

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Devon County Council’s November 2020 Exeter Transport Strategy is now over five years old and is half way through. It cannot be considered reliable evidence at this point without updating and going further to 2035 or beyond. A number of the schemes listed as completed by March 2025 have been significantly reduced in scope because of public objections, so their likely impact is much reduced. Given the track record in significantly modifying and reducing the impact of such schemes in light of public opinion, the proposed future schemes and their mitigating effect need to be reassessed for the plan to be sound.

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**4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes**

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**Proposal:** 5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** -

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**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** -

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**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes**

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**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.** The traffic and transport consequences of the proposed development at the West End and Exmouth are significant, have been inadequately considered and deserve further analysis and assessment.