

The Topsham 20 Response to The Exeter Plan



About the Topsham 20 Campaign

The Topsham 20 Campaign represents the interests of residents in Topsham who are concerned about the impact of traffic on the Town. In addition to establishing the Topsham Speed Watch Group in collaboration with Devon and Cornwall Police, it is engaged in discussions with Devon County Council and its local councillors to secure measures to:

- slow traffic to acceptable, safe speeds and
- reduce traffic, particularly traffic on its through routes caused by drivers rat-running.

The whole of Topsham is subject to 20mph speed limit. Whilst this speed limit is legally enforceable and backed by the necessary traffic regulation order, a very large number of drivers using the through routes vastly exceed this speed limit. In a 2 week traffic survey in 2017, 15% of drivers exceeded the speed limit by more than 60%. Many 1000s of vehicles pass through Topsham's narrow main road every day.

Additionally, traffic volumes have increased significantly in recent years both as a result of increasing development, including on the Topsham Gap, and due to rat-running as drivers choose to drive through Topsham instead of remaining on the designated trunk route (Exmouth Road / Sidmouth Road) when driving into Exeter or Marsh Barton.

Both the speed and volume of traffic blight the local community, making active travel far less attractive and safe and resulting in significant additional noise. Parts of the town on Clyst Road, Elm Grove Road and the dwellings to the east of these roads suffer to a significant extent as the roads, which were never designed for the volume or speed of traffic, sever them from the centre of Topsham.

Topsham is on the Exe Valley Trail, the cycle route from Exmouth to Exeter. Due to the street layout, the Topsham section of the Exe Valley Trail is necessarily on roads, including Elm Grove Road. It is effectively the "missing link" for cyclists between Exmouth and Exeter and there is no good solution to provide commuting cyclists with a good quality off-road or protected infrastructure.

However, the Topsham 20 Campaign believes addressing the traffic issues will ameliorate the problems caused by the missing link on the Exe Valley Trail, as well as generally increasing active travel within Topsham and improving the quality of life of local residents.

Summary

This response addresses the impact of the draft Exeter Plan on traffic and travel in and through Topsham, particularly as a result of the proposed allocation of housing on sites 91, 92, 93 and 94, all of which are on Newcourt Road.

The Topsham 20 Campaign notes that the draft Plan seeks to minimise the need to travel whilst maximising active travel (walking, cycling etc). We welcome this, and particularly the concept of 20 minute communities where residents can reach most of their daily needs within a 10 minute walk or cycle ride from their home. Properly adopted, it believes that this policy could mitigate the impact of future development on the traffic problems faced across Topsham.

The Newcourt Road greenfield sites earmarked in the draft Plan for development (91, 92, 93 and 94) do not meet the laudable aspirations set out in the draft Plan. They will create developments far removed from civic centres and from transport networks. The car will be the primary means of transport.

ECC's assessment of the sites and, in some cases, the criteria used for the assessment are flawed. If permitted, these developments will further contribute to the traffic issues within and through Topsham. The Topsham 20 Campaign believes that these sites should

not be identified for development.

In the event that development is permitted on Newcourt Road, we believe there should be provision in any planning consents to mitigate the adverse increases in traffic in and through Topsham. This might include funding by developers of robust traffic calming across the through-routes, in addition to robust measures to ensure Newcourt Road remains a desirable low traffic environment that can be enjoyed by pedestrians and cyclists, Calming across Topsham's through roads would reduce speeds; it would also tend to discourage rat-running from Exmouth Road to Countess Wear roundabout, and as such it would help off-setting the increase in road traffic caused by the developments.

The Topsham 20 Campaign supports 20 minutes communities, aimed at reducing traffic

The Topsham 20 Campaign supports the following aspects of the draft Plan's vision:

- making use of land so that Exeter remains compact and walkable (S2, principle 1);
- enabling sustainable transport for access to the city centre and local centres (S2, principle 1);
- providing safe healthy and accessible streets which are people-friendly ((S2, principle 3);
- incorporating active travel, reallocating road space to maximise active travel (S2, principle 5);
- minimising the need for travel and maximising walking, cycling and public transport (CE1);
- supporting development in locations which reduce the need to travel and maximise walking, cycling and public transport for the majority of everyday journeys (STC1);
- 20 minute communities, were communities can access most of their daily needs within a 10 minute walk or cycle ride from their home (STC1);
- Creating an environment which is safe and attractive to pedestrians, cyclists and users of emerging modes of transport (STC2);
- Enhancing bus provision in the city on Topsham Road (ST4). It would be helpful if the ExeterPlan clarified that this extends along Exeter Road and into Topsham;
- Developer contributions to be sought through CIL and s106 to ensure that necessary physical, social, economic and green infrastructure is in place (IC1).

Serious concerns about the compatibility of the Newcourt sites with the strategy

However, the Topsham 20 Campaign has serious concerns about the Council's assessment of the suitability of the proposed development sites on Newcourt Road taking account of these principles.

Newcourt Road is a quiet lane bounded to the east by the railway line. It is a cul-de-sac, with no vehicular access beyond its northern end.

As a result, all motorised traffic to Newcourt Road is through Topsham, via Denver Road. From the proposed development sites, this entails a significant detour southwards for any traffic bound for Exeter, Marsh Barton, Sowton or the M5. It will increase traffic not just along Newcourt Road and Denver Road (neither of which is suitable for significant increases in traffic volumes) but also:

- along the main routes out of Topsham to Exeter, the M5 and Exmouth (Elm Grove Road, Clyst Road, High Street and Exeter Road);
- into the centre of Topsham itself, as residents of the new developments seek to access shops, medical facilities, schools and other facilities. This will also increase parking pressure, which both traders and residents already consider to be a problem.

This traffic will also seriously compromise Newcourt Road as a viable route for cyclists and pedestrians. The lane is narrow and unlikely to be able to accommodate a pavement. It is often difficult or impossible for motorists to pass cyclists. There is unlikely to be space to improve these features, particularly at the Topsham end of Newcourt Road but probably also for most of the length.

The sites do not meet the criteria for a 10 minute community. They fail most of the tests set out in D.4 of the Site Assessment Criteria. In particular:

- All sites are more than 450m from a primary school and, as ECC recognises, parents are unlikely to walk long distances with young children.
- All sites are more than 900m walking from a secondary school.
- All sites are more than 720m from Topsham. Although site 91 is just within 720m from Sparat Newcourt, this cannot reasonably be considered as a "town" or "local centre": there are no medical facilities, pharmacy, schools, cafes etc. Further, particularly at night the route to Newcourt is unlikely to be desirable or acceptable to most, as it is remote and crosses the M5. Indeed, Newcourt is not listed in the draft Plan as a district centre or local centre (see paragraph 7.5 of the draft Plan).
- Most of the developments are in excess of 450m from Exeter Road and bus stops.

In light of all the above constraints, it is almost inevitable that residents at the proposed developments will seek to drive for a large proportion of journeys. This includes not just commuters travelling towards Exeter, but in all likelihood those travelling to the Topsham community.

The construction of 125 new dwellings on the outskirts of Topsham will place inevitable strain on existing facilities. Of particular note, Topsham School is over subscribed with single-form entry. As applicants are selected based on distance from the school, it is foreseeable that children at the proposed developments will not be allocated places. Parents may therefore have to travel (likely by car) to Countess Wear School or Clyst St George, increasing vehicular traffic (or resulting in the "bumping off" of other Topsham families, who will likewise need to transport their children to schools outside of Topsham by car).

SA objective 8 (To reduce the need to travel by private vehicle and encourage sustainable and active alternatives)

Regarding Sustainability Appraisal objective 8, the Topsham 20 Campaign notes that Exeter City Council provisionally regards all the developments on Newcourt Road as likely to have a significant positive effect. This is on the basis that Exeter City Council proposes to use a criterion that scores any site within 1.8km of a railway station as likely to have a significant positive effect. It is notable also that this criterion is so broad that almost every site assessed by ECC is deemed, on this basis alone, to have a significant positive effect measured against objective 8. The criterion is manifestly irrational.

First, it entirely ignores active travel, notwithstanding that STC1 and STC2 emphasise the importance of prioritising these modes of travel (see STC1 (1), (2) and (3) and STC2 (1a)-(1d), (2c) and (2d)).

Secondly, it prioritises rail travel over all other sustainable modes of transport. As a policy, it fails to take account of the fact that:

- even when rail travel is available, most people travel by alternative means (including car).
- rail travel is only a solution where the train travels to the traveller's desired destination (a serious consideration given that Exeter's rail network is not dense).
- The majority of travellers in Exeter are unlikely to travel by sustainable means for 1.8km from their home to take a train elsewhere within the Exeter area when there are alternative means of travel (including cars). This is particularly the case given that the distances within Exeter are relatively short: a commuter could travel to central Exeter by car significantly more quickly than the time taken to walk 1.8km to the station.
- Passengers will need to travel from the destination station to their ultimate destination, potentially significantly further increasing the journey distance to and from stations.

It is entirely unclear on what basis Exeter City Council has determined that 1.8km is the appropriate distance. If it is by reference to commuter habits in Greater London or other major conurbations such as Birmingham and Manchester, this is entirely inappropriate given the differences between the demographics, geography, rail and road networks of Exeter compared with London and other major conurbations.

Additionally, in the case of the proposed Newcourt Road developments, the predominance of the proposed 1.8km criterion means Exeter City Council fails to take account of the significant local issues identified and the impact of the proposed Newcourt Road developments on traffic.

We note that ECC has assessed that each of sites 91-94 inclusive has potential to provide a great place to live with developments that could include measures to minimise car use and promote sustainable and active travel, including financial contributions to significantly improve pedestrian and cycle links to Newcourt and Topsham railways, a new pedestrian/cycle bridge and enhanced bus routes.

We make the following observations:

- For the reasons set out elsewhere in our response, Newcourt Road offers a good, quiet way popular with cyclists and pedestrians. It is very unlikely that this can be “significantly improved” by developer contributions. Rather, as explained elsewhere, any development is likely to significantly degrade this route from the perspective of cyclists and pedestrians.
- For the reasons set out elsewhere in this response, these sites are unlikely to promote active travel. They will not form part of a “20 minute community” and residents will be highly car-dependent.
- A pedestrian/cycle bridge across the Avocet Line will be a “bridge to nowhere”: there are no facilities or other amenities to the east of the Avocet Line. This proposal is frankly poor-quality window-dressing by developers.

If these sites are to be designated for development, the Topsham 20 Campaign believes the only way to prevent significant additional car usage is for there to be a planning condition that these should be car-free developments in line with STC2 (final paragraph).

SA7 (to provide good access to services, facilities and education)

Regarding Sustainability Appraisal objective 7: ECC has assessed sites 92 and 93 as having both minor negative effects and uncertain minor negative effects. By contrast for sites 91 and 94 it has reached a different conclusion that the sites have minor positive effects and uncertain negative effects. This appears to be on the basis that ECC has concluded that sites 91 and 94 are located within 720m of a District Centre or Local Centre.

Site 91 is the most remote from Topsham at more than 1,000m on any possible measurement. It is technically closer to the Spar shop at Newcourt, but Newcourt is not (for good reason) regarded by Exeter City Council as a District Centre or Local Centre. Site 94 is around 900m from the closest shops in Topsham (and more than 1,000m from Newcourt); whilst it is closer to the boundary of Topsham, this is irrelevant since the boundary has no facilities. These distances will significantly increase the likelihood that residents drive, either to the centre of Topsham or through Topsham to alternative facilities.

Exeter City Council’s assessment of sites 91 and 94 against SA7 is wrong.

SA4: improve the physical and mental health and wellbeing of residents and reduce health inequalities

Regarding Sustainability Appraisal objective 4, sites 91, 92 and 93 are considered in the draft Plan to have “minor positive effects”, apparently on the basis that ECC considers they are within 720m of either a healthcare facility or an area of open space / sports facility. As none of these sites is within 720m of a healthcare facility, it appears that ECC has determined that they are within 720m of an open space / sports facility.

This assessment is flawed: it is possible that ECC has considered that Topsham Rugby Club and the University Cricket Ground qualify as open space and sports facilities, but neither of these is public land and neither is therefore suited to the needs of the majority of residents (particularly those who do not play cricket or rugby / are not University students). As a result, it is likely that residents will travel further afield (for example to the recreational ground in Topsham) or to Exeter for formal sporting facilities. This will significantly increase vehicular traffic.

Mitigation

The Topsham 20 Campaign notes that IC1 (delivery of infrastructure) recognises developer contributions should be sought through CIL and s106 to ensure necessary physical, social, economic and green infrastructure is in place to deliver the development.

For the reasons set out in this response, it does not consider further development in Newcourt Road should be permitted as it does not meet the objectives set by ECC.

However, in the event that development is permitted on Newcourt Road, we believe there should be provision in any consents to mitigate the adverse increases in traffic in and through Topsham by way of s106 contribution.

In particular this must include:

■ robust traffic calming across the through-routes. Such calming would reduce speeds. It would also tend to discourage rat-running from Exmouth Road to Countess Wear roundabout. Reducing through-traffic in Topsham's main roads would materially contribute to off-setting the increase in road traffic caused by the developments.

■ Robust measures to ensure that Newcourt Road remains desirable for pedestrians and cyclists, and that motorised traffic does not dominate. This is vital, since the proposed new dwellings are at best physically marginal to the local communities and residents will therefore be encouraged to use active travel only if they find this safe, pleasant and enjoyable.

The Topsham 20 Campaign is concerned to ensure that each development contributes meaningfully to these measures. It notes that each proposed development on Newcourt Road is for between 13-43 dwellings but that the cumulative effect of these developments will be significant. Each must therefore be required to make a significant contribution.

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On behalf of the Topsham 20 Campaign