

## PROPOSED ADDITIONAL TRAFFIC CAPACITY TO ROUNDABOUT AND PROVISION OF NEW UNDERPASS

### DCC APPLICATION REFERENCE DCC/4142/2019

I am writing to request clarification on a number of issues around this application and to raise objections to the scheme as submitted.

#### Environmental Impact Assessment (EIA)

From an initial review of the above application and its supporting documents it would be helpful at this stage if the following matter could be clarified and we look forward to the early response of DCC as applicant on this procedural point.

In its pre-application exercise, DCC concluded that an EIA was not required to support the present application (PRE/1290/2018 dated 2 February 2018) and in so concluding referred to Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017 No. 571) as the works were stated as not exceeding 1 hectare in area as defined in Part 10 (f) of Schedule 2.

However, Section 4 of the submitted Application Form to the subsequent Planning Application DCC/4142/2019 states the Site Area to be 41675 square metres; the stated area is significantly over the discretionary EIA Schedule 2 threshold and significantly above the 1.7ha site area considered in the screening opinion.

Specifically, in respect of the present underpass proposal DCC as applicant state in Section 2.0 of the PRE/1290/2018 letter dated 16<sup>th</sup> January 2018 that the proposals to increase the vehicular capacity of Bishops Tawton Roundabout form one element of the proposed increase in vehicle capacity to the A361. This latter scheme, of which the Bishops Tawton roundabout forms an important part, falls within Schedule 1 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Notwithstanding, the above noted DCC Screening Opinion PRE/1290/2018 undertaken by DCC states that the *Bishops Tawton Roundabout (works to increase the capacity and provision of a segregated pedestrian facility)* “is not considered to involve a form of development or meet the thresholds listed in Schedule 1 of the EIA Regulations 2017, is considered to be listed in Schedule 2.(10)(f) of the EIA Regulations 2017 but do not exceed the relevant 1 ha threshold for the area of works at approximately 1 hectare and not within a sensitive area” (DCC wording).

However, my understanding is that the basis of environmental impact assessment is cumulative. I can see no mention of the underpass proposal in the scheme EIA (published in 2017). Are the screening opinion and the original EIA to be revisited, to take account of the introduction of the underpass and the misunderstanding over the site area?

If this is not the case, and the underpass was part of the EIA required by Schedule 1 of the EIA Regs 2017 that accompanied the NDLR Planning Application DCC/4091/2018, please advise where this information has been published and may be accessed?

#### Road Safety Audit:

The submitted road safety audit does not consider risks to pedestrians and cyclists at the junction. It appears to deal only with the safe design of the junction in relation to motor vehicles. There is no assessment of the risks to pedestrians of having to cross Bishops Tawton Road twice in order to move from Hammets Lane to Style Close, no assessment of the likelihood of pedestrians choosing to cross at grade rather than use an underpass and no assessment of the likelihood of cyclists travelling from Barnstaple to Bishops Tawton choosing to dismount and cross the road twice in order to use the underpass rather than attempting to cross the new roundabout.

This approach is symptomatic of the apparent priorities being given to car travel by DCC in this area in disregard of national and local policy to promote walking, cycling and public transport over private car use.

#### Signalised Crossing Options:

The submitted planning statement discusses the option of a signalised crossing and discounts it on safety grounds. The research referred to (P10 of Planning Statement) is not included with the application and there are a number of questions raised as a result:

- 1 Does the research relate only to isolated signalised crossings on 60mph roads? The crossings would be at a junction, where traffic would be slower than on an isolated stretch of road.
- 2 APP 3 of the 2017 Environmental Assessment Report suggests that the speed of traffic on the Portmore to Roundswell stretch of the A361 will be 40-50mph, not 60mph. Has this been taken into account in the analysis?
- 3 Has similar research been undertaken for the other options considered – i.e. bridges and underpasses – where pedestrians choose to cross at grade rather than use an alternative mode?

#### Residential Amenity and Quality of Life Issues:

The northern arm of the junction leads onto Bishops Tawton Road and South Street. The road narrows soon after the Park School roundabout and, at peak traffic flow times, it is clear that the local road network is unable to cope with the volume of traffic. South Street is expected to cope with a 30% increase in traffic when the alternative and more suitable routes of the Western Bypass and Eastern Avenue are projected to see only a 6% increase and enjoy a 6% reduction in traffic respectively. This isn't acceptable. South Street currently has a very necessary weight restriction limiting its use to vehicles of 7.5 tonnes or less, except for access. The same characteristics that make the route unsuitable for heavy vehicles make it unsuitable for high volumes of through traffic. There are currently queues of stationary traffic at least three times a day.

The design of the roundabout will tend to encourage traffic flows northwards and exacerbate the situation. Notwithstanding the signage schedule, there is nothing in the proposals that will help to address an unacceptable situation that affects the quality of life of local residents. Details of our concerns have been discussed at length with DCC officers and were detailed in my comments on application no. **DCC/4091/2018**

Similarly, there will be adverse impacts as a result of the proposed infrastructure on the residential amenities of occupants of adjoining properties by virtue of the nature, scale and location adjacent to their homes. I know that residents have written to you already in passionate terms outlining their concerns about the impact of the junction on their lives.

Local Plan Policy ST05 requires major development to make a positive contribution towards the creation of cohesive communities. In its flagrant disregard of the quality of life of communities on either side of the link road, this proposal fails that test.

#### Sustainable Use of Resources

The underpass element of the proposal is flagrantly wasteful of resources – both financial and environmental.

While there is scope for use of recycled materials in its construction, there is no doubt that concrete and cement will be the key materials used in the underpass. In 2017, cement production accounted for around 8% of global CO2 emissions – it emits nearly 1kg of CO2 for each kg of cement produced.

Its use must clearly be considered with care. Significant quantities of cement would inevitably be used in the underpass.

The underpass proposal is a costly solution to a problem that need not exist. DCC staff have suggested an estimated cost of £2m for the development, to cater for the 60 or so people per day crossing the road (the numbers have been remarkably consistent across the 2012 and 2019 pedestrian counts). The majority of these crossings are at morning, afternoon and evening peak traffic times, when traffic would be moving slowly through the junction as it approaches or leaves the Rumsan Bridge bottleneck. A far more prudent response would be the use of toucan controlled crossings at the junction – even if it meant a redesign of the junction itself.

Policy ST05 of the Local Plan also requires major development to be built to a standard that minimises the consumption of resources. ST02 requires the prudent use of key resources and for development to minimise its carbon footprint. The proposal fails to meet these planning policy objectives.

I look forward to your early response on the above matters.

Cllr Caroline Leaver 07739 459717