

**Pilton Residents Group**  
23 Northfield Lane Pilton Barnstaple EX31 1QE

David Black,  
Head of Planning, Transport and Environment,  
Lucombe House,  
Topsham Road,  
Exeter,  
EX2 4QD

cc Peter Heaton Jones MP

18<sup>th</sup> May 2015

**Ref PB2642596 / Your letter to Sir Nick Harvey dated 18<sup>th</sup> March 2015**

Dear Mr. Black,

You wrote to Nick Harvey addressing concerns both he and the Pilton Residents Group have regarding the *Cumulative Traffic Impact* of planned developments for the Pilton area.

PRG have examined each of the Transport Assessments (TAs), Transport Statements (TSs), and also your officer's responses to them, and it is evident that the major traffic implications for Pilton have not been correctly assessed in relation to *Cumulative Impact*.

PRG compiled a report entitled '**Cumulative Traffic Impact of Six Major Developments Affecting North Barnstaple**' which lists many of the errors and inconsistencies running through these assessments, and also within Highways Officer's consultation responses. This report was distributed to the delegated NDC Planning Officer and Members of the NDC Planning Committee prior to the meeting to consider Raleigh Park on 16<sup>th</sup> April 2015.

To date, the DC Highways Officer, the NDC Planning Manager and delegated Planning Officer have failed to give satisfactory responses to information presented in our report.

PRG have now had the opportunity to consider the content of your letter in more detail. We have highlighted your comments in blue with the PRG response below them.

- **Applicant's Assessments and Highway Officer's Consultation Responses**

"Each of the developers of sites around NDDH have provided full Transport Assessments...."

This is untrue, and we ask you to read our report which summarizes what was actually included within each assessment.

As an example, Westaway Plain only provided a Transport Statement, and as such failed to consider any aspects of the overall *Cumulative Impact* for the area.

"The Transport Assessments for sites in this area have all considered the likely traffic that will be generated from...." and you list all possible sources of potential traffic generation.

If your officers had properly examined each TA/TS, it would have been evident that the above had *not* been done for *all sites*, as our report explains.

If specified at the pre application stage, that the *sensitivity testing* for predicted traffic generation from *all of the above* should be modelled by *each* applicant, then the majority of applicants have not complied.

Most sites have only considered the *worst case scenario* for their own specific site, plus the committed development; the committed development being only that for NDDH.

“The developers have gone above and beyond the need for assessment by including uplift for summertime traffic flows”.

The Westaway Plain TS fails to show this uplift in the data presented.

We understand that compensation for increased summertime traffic flows would have been requested at pre-application stages as a prerequisite anyway. Why in your judgement have they gone above and beyond what would have been required of them anyway?

- **Trayne Farm and the impact of further development on the Pilton Bridge Junction**

“With the first application in this area, Trayne Farm, the Highway Authority recommended refusal due to the severe impact of the development.”

Crucially you do not state that the application was refused on two counts due to severe impact at the NDDH Junction *and* the Pilton Bridge Junction.

Severe impact on *both* junctions was clearly stated in *reasons of refusal*.

You then justify *why* the refusal was later withdrawn and say it was a result of contributions agreed later by the developer, but these were essentially only to mitigate the impact at the NDDH junction.

“In terms of physical works there is very little that can be done at this junction due to the physical constraints of land ownership and being on top of the thin bridge deck.”

“We hope to gain a small percentage increase in the capacity at this junction by the introduction of a more intelligent traffic signal system.”

“Change of stance to one of no objection has been perceived by many objectors as a U-Turn whereas it is good practice by the officer.”

You have admitted that little can be done to reduce congestion at Pilton Bridge, yet this severe congestion was held up by your officer as one of the fundamental reasons for refusal.

Your eagerness to justify the U-Turn performed by your officer and pass this off as good practice is bordering on delusional, and an insult to everyone’s intelligence. The fact is that your original recommendation for refusal at Pilton Bridge was withdrawn without presenting any reasonable and rational justification for doing so.

It destroyed what little credibility your authority may have once had with our local community, and is perceived as manipulative.

The PRG report shows that the modelling of Pilton Bridge presented within the Raleigh Park TA grossly underestimates the junction overload on the most critical arm. By the developer’s own admission, this junction will be 17% over capacity (90% RFC being acknowledged as at capacity), but if modelling had been done using methods followed in other TAs, we would predict 25% overcapacity.

These estimates of overcapacity will be further worsened by traffic generated by the Ilfracombe Southern Extension which is expected to have a major impact on North Barnstaple from 2018. We are now at the stage where three more applications have been approved solely on the strength of improvements at the NDDH Junction, yet no significant improvement can or will be made at Pilton Bridge. We fear that other unsuitable roads, some of which are largely single carriageway, will be overwhelmed by additional traffic generated by these developments.

“The creation of 477 houses in the area will not result in 900 additional cars.”

We are unsure from where this alleged PRG statement came. In fact PRG have never discussed number of cars and we have only ever used data contained in your Officer’s reports and applicants TAs for predicted traffic movement associated with numbers of new dwellings (data largely based on the national TRICS model)

We fully accept that modelling impact can only be based on the estimated additional traffic movement associated with a new development.

- **Traffic growth , the Local Plan and the NPPF**

In relation to traffic growth, you state that developers have used TEMPro to estimate this. The result is a specified growth of 5% projected to 2018, yet this is not consistent with the growth of jobs and dwellings projected in the emerging Torridge and N Devon Local Plan over the plan period to 2031.

Even if TEMPRO growth of 5% over 5 years truly reflects traffic growth as a result of the Ilfracombe Southern Extension up to 2018, how useful and relevant is this in forecasting the traffic implications for the full plan period of the emerging Local Plan, and the additional impact on Pilton Bridge?

‘Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan Stage.’ [DFT circular 02/2013 (For trunk Roads)]

‘...general highway impacts should have already been considered at the Local Plan stage.’

We see little provision within the emerging Local Plan to alleviate the most congested areas of our highway infrastructure where development is currently being promoted.

In relation to *severe impact* you state that “Neither the NPPF nor NPPG contain a definition of *severe*.” This is indeed convenient for authorities such as yours to abdicate responsibility for ensuring that proper infrastructure planning takes place *before* major development is approved.

We remind you that the NPPF *does* attempt to defines *sustainability* in Para 7. It states;

**There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:**  
☐ **an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available *in the right places* and at the right time to support growth and innovation; and by identifying and coordinating development requirements, *including the provision of infrastructure***

By promoting developments in places where infrastructure is already at capacity, and where there is little or no capability to improve it, both the Local Authority and your Highways Authority have totally disregarded the requirement for such development to be *sustainable*.

In relation to infrastructure, we remind you that Para 162 and Para 177 of the NPPF respectively state under the heading of *Infrastructure*;

**Local planning authorities should work with other authorities and providers to:**

**▪ assess the quality and capacity of infrastructure for *transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management*, and its ability to meet forecast demands; and take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.**

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**It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan**

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The Parliamentary **Communities & Local Government Committee** reported in December 2014 on the *‘Operation of the NPPF’*, and a key recommendation was that;

**“Decision-makers should fully explain the consideration they have given to its impact on infrastructure and *explain how and where they expect the infrastructure to be provided, and to what timetable.*”**

In summarizing, we would like to stress that PRG are not against future development per se, but consider that inappropriate and disproportionately large developments in locations which lack the supporting infrastructure should be opposed.

To quote the architect of NPPF, Greg Clark MP, and now Secretary of State for CLG;

**“The purpose of planning is to help achieve *sustainable* development. *Sustainable* means ensuring that better lives for ourselves don’t mean worse lives for future generations.”**

Since Sir Nick Harvey is no longer in a position to correspond, PRG would very much welcome a direct response to our letter.

Yours sincerely,

Geoff Pugsley, for Pilton Residents Group (PRG)