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Dear Tina,

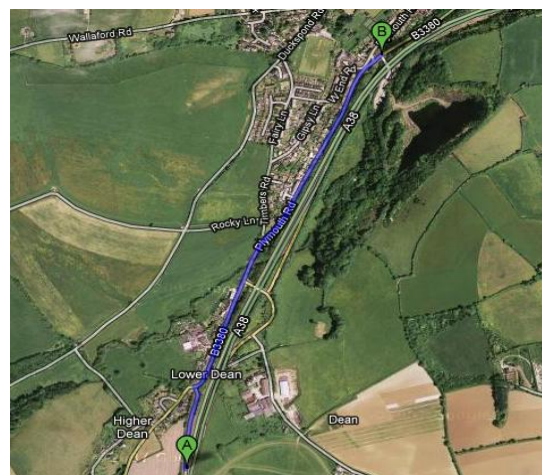
Many thanks for keeping me updated with the ongoing status of the Health Impact Assessment being undertaken in Buckfastleigh. I wanted to set out for you in more detail a few of the issues specifically concerning the situation with the road system in Buckfastleigh and its impact in relation to its current usage and the usage if the proposals for Whitecleave Quarry were to go ahead. Hopefully this will aid the information gathering exercise as part of the Health Impact Assessment.

I believe this is a very key issue for concerns people have, in particular of course those who live within close proximity of the quarry, and those who live along the B3380 (a.k.a. Dart Bridge Road, Strode Road, and Plymouth Road). I understand that there is much work in progress in this regard, but I thought it would certainly aid clarity of the matter if I could perhaps add the perspective of the community as I understand it from my role as Chairman of the Community Forum.

I have presented the information in two blocks: firstly the perceived or real physical dangers of the road system (I have not addressed noise or emissions at all here); secondly, the mental anguish associated with some of the issues.

B3380 - issues of perceived or real physical dangers starting from the Lower Dean exit of the A38 and working North. (I should state that some of these issues I discussed with Tamsin Wray of Scott Wilson at an MVV presentation, although none of these issues were addressed as part of the Traffic Statement and planning application):

1. HGV traffic is currently advised not to use the Lower Dean exit - I am led to believe that Hanson Aggregates used to respect this advisory sign but it will be ignored according to the latest application.
2. This exit slip-road is dangerous - it is straight off the A38 on a downhill stretch into a blind bend. Fully-laden lorries exiting here pose a risk to this junction. There is a crash barrier installed on the far side of the B3380 on this road to protect the house. I understand the crash data along this stretch of road was not given in MVV's Traffic Statement - it would have included vehicles crashing into buildings along this stretch of road.



3. This stretch of road is very narrow. It is a *de facto* one lane road as there are always cars parked along this stretch of road narrowing it to one lane. The road is just over 3 metres from some people's houses. This contributes to greater vibration, noise and perceived risk.
 4. I should point out that although this is still not widely understood and has been deliberately distorted in public statements, the planning application¹ clearly states that the anticipated **Peak Traffic movements are for over 200 HGVs a day**. This makes the assumption that any demand for IBA would "likely" come from the direction of Exeter - this is of course not guaranteed and could imply over 100 HGVs a day using this stretch of road (with 100 joining the A38 at the "under bridge" junction).
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5. I understand that this stretch of road is 1 metre narrower than the national average for B roads with a 40mph speed limit.
 6. The B3380 has been narrowed in some places since it was the A38 (which was opened in 1974) and is just one reason why attempts to justify the acceptability of increased traffic movements by describing this road as being "the old A38" are highly bogus.
 7. Many new properties have been built along the stretch of road between the Lower Dean exit and the quarry in the last few years. This may justify new traffic surveys as old data may no longer be relevant.
 8. Also this new development has been accompanied by new services - longitudinal trenches have appeared along the road which may cause the road to start to break up under increased HGV usage (of which theoretically there should currently be almost none).
 9. Virtually the whole of the B3380 from Lower Dean to Dart Bridge has solid white lines in the centre of the road - either double or single. This highlights the difficult driving conditions on this road in terms of visibility due to bends and dips in the road which make overtaking unsafe.
 10. Coming down by Half Moon Court, a large new residential development, it appears there is an informal agreement about residents' parking along this stretch of Plymouth Road. The pavement is wide enough to accommodate parked cars, but not always with pedestrian access. Parking on this stretch of road is very difficult and residents currently do not regularly park on the road out of good will to other road users. This makes the road, at best, very awkward for pedestrians and also dangerous. I do not use this stretch of pavement with my family because I feel it is very dangerous. This essentially creates severance within the community - walking to Dean Court Farm Shop or Dean Prior Garden Centre, for instance, from the centre of Buckfastleigh involves taking (what I personally regard) as unnecessary risks even with current traffic levels. Residents could of course decide to park on the road as a matter of course, thus reducing its width to one lane.
 11. This stretch of road is also deemed to become part of the National Cycle Route 2, an essential aid to the tourist industry. It is currently used by cyclists for pleasure and practical journeys. It is already dangerous and increased HGV traffic will greatly increase this danger, especially at a 40 mph limit. It is illegal to overtake a cyclist who is doing more than 10mph by crossing a solid white line. I am reliably informed that most cyclists will indeed be doing at

least 10mph along this stretch of road. An accident involving an overtaking lorry (of which I would presume there would be many) would potentially threaten legal action.

12. As the quarry is approached, the planning application proposes to alter the layout of the junction to eliminate the acceleration lane and add a central overlapping right turn lane specifically for access to the quarry (overlapping with traffic turning into Plymouth Road coming from the North). This would actually appear to increase the danger of this junction as it creates unnecessary blind spots. Surely a more thorough Road Safety Audit, including public consultation, should have taken place around this junction prior to the planning application being submitted? This appears to be the cheap option at the expense of public amenity and safety. The single concession to pedestrian safety along the whole of the B3380 is proposed here too, which is to have a traffic island specifically in order to aid pedestrian access to the quarry. It is this kind of selfish approach that has exacerbated mental anguish in the community.



13. It should be noted also that the traffic speed survey was undertaken around this junction, not explicitly stated where, but a location that appears to almost deliberately understate the true speed of traffic along this road. I understand that speed surveys are required by law at least every 600m along a road to be impacted by a new development. More speed surveys, more explicitly located and accountable are needed along this road.
14. Travelling north towards Dart Bridge there are several dangerous sections of road. The straightest section of road is here which encourages excessive speed and overtaking. I have regularly witnessed people travelling at approximately 60mph along this stretch of road. Although pedestrian separation is at its greatest here, the proclivity for excess speed adds to the perception of danger. It should be understood that this whole stretch of roadway is actually a key part of the town's social network as it is regularly used by joggers, dog-walkers, cyclists, and mothers walking children.

15. This stretch of road ends in a chicane, where long skid-marks (aimed towards the pavement) can regularly be seen in the road as people misjudge the bend. The road goes downhill at this point, and it is easy to achieve excessive speed unwittingly. This is at the junction of Old Totnes Road and Elliott Plain which is a key pedestrian access route into town. There is a nursing home just over the road, and there is even a warning sign for elderly people - the road is in fact very wide here, and has absolutely no mitigation measures that take pedestrian safety into account.



16. The grass verge disappears and the pavement narrows again after this point with pedestrians very close to the traffic. Because the road heads down into a dip from both

directions, traffic tends to move very fast here. There is an ever-present feeling of danger - my child's blanket was once physically lifted from his buggy by the draft of a passing HGV along this stretch of road. The threat of falling debris from waste lorries, or secondary uplift of road debris is very apparent. This is where the entrance to Millennium Green park is situated, again another key green space and social centre in town.

17. At this point the road is very wide. The pavements are very narrow. There is a bus stop on each side of the road here. If walking with a buggy it is impossible to walk past the bus stop without using the road if people are waiting for the bus, or asking them to stand in the road.
18. This is the entrance to the South Devon Railway - one of the largest tourist attractions in South Devon. However, pedestrian access to the town for visitors is again, at best, awkward and unpleasant, and at worst highly dangerous.
19. As the road heads back up the hill, towards the blind bend, solid white lines prevent overtaking, although this stretch of road is often used by cyclists.

20. Coming around this bend, the road once again heads downhill to Dart Bridge. There is only pavement on one side. It is very narrow at several points - less than 1.5m in some places. Cars often park on the pavement and block the way, forcing pedestrians with buggies into the road. There is a child minder who lives on this stretch of road who regularly needs to take several children into town.



21. As the road approaches the mini-roundabout the downhill gradient increases as the road bends quite sharply. Once again there are often (double-tracked HGV) skid-marks along this stretch. This whole stretch of road is highly unpleasant for pedestrians, but again is a key pedestrian link into town for people who live along this stretch of road or wish to visit the Dart Abbey Inn or The Mogul's Palace restaurant.

22. All this should be taken in the context that not only is this road currently signed as a 40mph zone (where a pedestrian has an 80% chance of being killed if hit by a vehicle), but the planning application indicates that peak traffic from the quarry along this stretch of road would be over 200, 40-tonne HGV movements a day (please note these are now bigger lorries than used during quarrying).

23. This road is also intended for use as an emergency alternative to the A38, and indeed now apparently new European 60-tonne super-HGVs are legally obliged to use it as the existing A38 viaduct is not strong enough.



Overall, the real or perceived physical dangers of this stretch of road are already badly mitigated, if at all. This would be greatly exacerbated by the proposed development, and this stretch of road appears to be long overdue a safety audit given the level of development, the ailing nature of the A38 viaduct, and new European legislation to protect the well-being of residents against traffic disturbance. There appears to have been a lot of work undertaken in recent weeks, including resurfacing parts of this road, and repair work being undertaken to the A38 bridge at Dean.

I am also led to believe that this road has already been agreed some years ago to be downgraded to a 30mph zone but this has not been enacted. I have copied-in PC Alison Hooper of Devon and Cornwall Police on this email because I believe she is aware of this situation and indeed has some paperwork confirming this.

The issues of “severance” of the community, identified by the Department of Transport as a serious issue with regards to road planning very much appear to be relevant to Buckfastleigh and the B3380. To my mind, there is already severe severance - defined by the DoT as:

Severe - People are likely to be deterred from making pedestrian journeys to an extent sufficient to induce a reorganisation of their activities. In some cases, this could lead to a change in the location of centres of activity or to a permanent loss of access to certain facilities for a particular community. Those who do make journeys on foot will experience considerable hindrance.

The issue of severance needs greater study and recognition and some public accountability. Several businesses including the Dart Abbey Inn, The Mogul’s Palace, South Devon Railway, Dean Court Farm Shop, and Dean Prior Garden Centre may suffer reduced trade already because of the severance, and this is further threatened (which is perhaps why over 60 local business people have signed a petition against the proposed development).

As we discussed at the HIA Scoping meeting, the issue of disenfranchisement and apathy appears to me to be a key health issue in town. Much of this can be traced back to the current situation with regards the quarry and the road. This has led to a level of anger and resentment within the community that has made the whole planning process much more difficult and confrontational. The expression “*it’s a done deal*” has often been heard in town (although much less so recently), reflecting the feeling of disenfranchisement that many people have in the community. I also come across the feelings represented in the expression that “*Buckfastleigh has always been dumped on and it always will be.*” For the few people I have met who are in favour of the proposals this appallingly diffident attitude appears to prevail. This would appear to threaten a self-feeding cycle of lack of aspiration both personally and for the community, which I believe is a concern of the HIA.

I cannot say that this attitude is necessarily justified as indeed there does seem to have been a lot of investment and regeneration in Buckfastleigh in recent years. However, in a few key area, this attitude may appear to be justified. The quarry and road system are the primary culprits:

Mental Anguish

1. The speed limit along this stretch of road has been a very controversial issue. It absolutely needs some clarity in public because there is much hearsay about what has or has not been

decided. There appears to be a prevailing view that the decision was taken to downgrade the road to 30mph some years ago but that lack of resources merely means that signage has not been changed to reflect this. I cannot believe this to be the case as that would be in clear violation of the Road Traffic Regulation Act 1984. People are angry about this issue though, and indeed seeing new 40mph repeater signs installed at the Lower Dean exit heightens this anger.

2. It would appear that a minimal Road Safety Audit was conducted around the entrance to the quarry by Devon Highways prior to the planning application, but this is not clear. There has been no public consultation about any aspects of the changes to the road system proposed in the application. As I previously stated, any concerns I raised with MVV at the public “consultation” have been totally ignored. I am far from the only one to have been ignored.
3. Genuine concerns raised with Devon Highways by Buckfastleigh Town Council in relation to a broader Road Safety Audit and other general issues of road safety appeared to be addressed with a cursory dismissal. This has angered both the town council and residents in town. If legitimate concerns of the town’s elected representatives are cursorily dismissed by representatives of the local authority it is no wonder that residents may feel apathetic and disenfranchised.
4. You may be aware that there is already serious controversy over the existing operations at the quarry - the existing ROMP (Review of Old Mineral Permissions) conditions specifically exclude the transportation of waste into the site to reduce traffic and protect the amenity of the town. These restrictions are either being ignored by Gilpin Demolition or have been renegotiated without any consultation of the community. Indeed the issue of the ROMP has contributed greatly to mental anguish in town. This is an ongoing issue, and relates to the disagreement over what is the appropriate “baseline” measurement, as the community here believe Whitecleave Quarry should legally be regarded as akin to a Greenfield site at present. It is too complex to go into in detail here, but comprehensive communication between the Community Forum, Mel Stride MP, and Dave Black of DCC can be found on our website:
<http://www.community.buckfastleigh.org/Mel%20Stride%20DCC%20correspondence.htm>
5. In light of this, I was astonished to hear from several people in town that Devon Highways have been using Whitecleave Quarry as a site to dump their waste! I do not know if this is true, but people have said they have seen Devon Highways lorries depositing waste at the site, and it is a situation that needs clarification. Also, Devon Highways could be the largest (possibly the only) potential client of MVV’s processed IBA secondary aggregate. Because of these issues there is the possibility of a conflict of interest in having Devon Highways as a statutory consultee on the proposals - the only consultee who appears to have nodded approval to the application without even a requirement for further information or clarification. Suspicion has been heightened in the community given the apparent lack of communication and co-operation with the community. Whether justified or not, this situation has certainly added to local apathy, resentment of the process, and a feeling of disenfranchisement. This would appear to need to be investigated further as a key part of the HIA.

Clearly there are legal issues about what can or cannot be expected of this process. The legal framework is very unclear. The use of the B3380 over many years has changed in relation to further

development in Buckfastleigh and increased traffic flows. This sits alongside more comprehensive legal protection for residents in terms of quality of life. Incremental changes perhaps have meant that the deteriorating conditions around the road and its relationship to the community may have gone “below the radar” of analysis. Perhaps the proposals for Whitecleave Quarry are merely the tipping point of a larger issue. However, as I understand it, there is an obligation to ensure that already existing conditions within a community in relation to social division and the transport infrastructure **cannot be worsened** by proposed development, and is a material consideration of planning.

The guidance document produced by the Department of Transport on *Detailed Guidance on Social and Distributional Impacts of Transport Interventions*ⁱⁱ appears to be a comprehensive guide to how some of these issues can be quantified and addressed, and maybe useful for the HIA. This could also be useful for establishing significant Section 106 Agreements or compulsory contributions via a Community Infrastructure Levy if the proposals were ultimately to be passed.

Once again, on behalf of the community, thank you very much for coordinating and undertaking the work on the HIA. Despite the unfortunate lack of clarity within the legal framework for the requirement to undertake such an exercise, it is a very welcome addition to the planning process and will hopefully be very useful for all those involved.

With many thanks and regards,

Neil

Neil Smith

Chairman, Buckfastleigh Community Forum

ⁱ Appendix 4, Traffic Statement, paragraph 5.5.7

ⁱⁱ <http://www.dft.gov.uk/webtag/documents/expert/unit3.17.php>