



**A380 South Devon Link Road (Kingskerswell Bypass)**

**Public Inquiry**

**Devon County Council's Response to**

**Mr David Bailey representing Teignbridge Friends of the Earth**

**(Obj 44): OBJ/TGFOE(44)/P/1**

**Response by David Black**

**with contributions by Paul Ewings, Ian Harrison, Peter Williams and  
Bethan Tuckett-Jones**

## **1.0 Introduction**

1.1 This Response (**DCC/REB/18**) to the Proof of Evidence of David Bailey on behalf of Teignbridge Friends of the Earth (TGfOE) (OBJ/TGFOE(44)/P/1) has been prepared by David Black with contributions by, Paul Ewings, Ian Harrison, Peter Williams and Bethan Tuckett-Jones.

1.2 Teignbridge FoE object to the Scheme on a number of grounds:

The compulsory Purchase Order is unnecessary

Alternatives have not been looked at as a package but only as individual measures

A package of alternatives consisting of alterations to the current road structure to ease congestion would be far cheaper and environmentally benign

Kingskerswell Rail Station should be reopened to provide an alternative to the car

Any benefits from the South Devon Link Road would be undermined with planned development

Traffic congestion is not as serious as claimed by Devon County Council

The Scheme will result in traffic congestion at Kerswell Gardens

The Scheme is not in accordance with the Government White Paper on the Future of Transport 1998

The Scheme results in the permanent loss of high grade land

The Scheme will not provide more choice about transport modes

The Scheme violates the Eddington and Stern reports as it results in an increase in greenhouse gasses and air pollution

The Scheme is not in accordance with the objectives of the Devon Local Transport Plan 2006 to 2011

## **2.0 The CPO is Unnecessary (contribution by Paul Ewings)**

2.1 The Overview and Scheme Development Proof of Evidence (**DCC/P/1**) considers the need for the scheme in Chapter 3 and also concludes in paragraph 12.6 'There is a compelling case in the public interest for the delivery of the Scheme (Circular 6/04, paragraph 17, CD 4.12) and on balance this need outweighs the impacts and therefore the public benefit outweighs private loss.

## **3.0 Alternatives Have Not Been Considered as a Package (contribution by Paul Ewings)**

3.1 The Overview and Scheme Development Proof of Evidence (**DCC/P/1**) describes the option appraisal process undertaken for the A380 Newton Abbot to Torquay Corridor Study. This process examined a total of 34 options, and where individual options were discounted during the assessment process due to their individual performance or impacts, it was not considered appropriate to consider them further for inclusion in any development of packages of measures.

## **4.0 A package of alternatives consisting of alterations to the current road structure to ease congestion would be far cheaper and environmentally benign**

4.1 Mr Bailey does not give any detail regarding suggested alternatives, however this issue is dealt with in the Traffic and Economics Proof of Evidence (**DCC/P/4**).

4.2 Devon County Council has spent considerable time and effort investigating the package of measures proposed by the Kingskerswell Alliance. The details of this

assessment are given in DCC/P/4, section 14 and DCC/A/4, appendix 11. The results of this assessment show that the proposals fail to fulfil a number of objectives for the Scheme, see DCC/P/4, Table 55-58. DCC/P/4, section 3 gives details of the capacity problems on the existing A380; these include principally the A380 link with its numerous side roads and frontage development. It is not possible to overcome the poor journey times and reliability on the route due to the existence of these side roads and frontage development.

## **5.0 Kingskerswell Rail Station should be reopened to provide an alternative to the car**

5.1 DCC/P/4, section 12.5 discusses future rail operation within the sub region; here consideration is given to reinstating the Kingskerswell Railway Station. Furthermore in DCC/P/4 section 12.5.4, it is recognised that there is scope for improving rail services by upgrading stations, improving interchanges and through more frequent and more comfortable trains. However, it is shown that implementation of these measures will not lead to any significant alleviation of traffic congestion on the A380. Whilst the potential of improvements to rail for alleviating congestion on the A380 is limited it is seen as a step in the right direction and would set a policy for the longer term to encourage more travel by rail.

## **6.0 Any benefits from the South Devon Link Road would be undermined with planned development**

6.1 All development within the sub-Region identified in the South West Regional Spatial Strategy (CD 3.3) is included in the traffic modelling, as detailed in DCC/P/4, table 24 and table 26.

6.2 DCC/P/4 diagrams 14 and 21 show the journey times along the corridor in the base year and in 2028 with and without the Scheme. The diagrams show that the journey times along the corridor increase between 2008 and 2028 without the Scheme by 4:30 minutes southbound and 1:30 minutes northbound. With the Scheme in place there is a journey time saving of 10:00 minutes southbound and 5:30 minutes northbound, well below existing journey times.

6.3 The Scheme will provide lower journey times and operate more reliably than the existing situation and the benefits of the route will not be undermined by the planned development.

6.4 There are no plans for future development between the Scheme and Kingskerswell village (as addressed in David Blacks Proof of Evidence, DCC/P/4, paragraph 15.10.2). The adopted Teignbridge Local Plan (CD3.5 and CD3.5A) identifies this land as countryside which is subject to Policy H7. The lands between Kingskerswell and Newton Abbot and Kingskerswell and Torquay are additionally identified as 'open land between settlements', with the latter also designated as an Area of Great Landscape Value. There are therefore no plans for any infill development in any of these areas.

## **7.0 Traffic congestion is not as serious as claimed by Devon County Council**

7.1 DCC/P/4 section 3 provides an analysis of the conditions on the A380. Traffic data from long term Automatic Traffic Counters have been analysed annually, monthly and hourly. All three analyses show that the variation in flows is not typical for such a route, indicating that the route is operating at or close to capacity for much of the day. Further analysis on journey times in section 3.9 show that the route has poor average journey times and poor journey time reliability, showing the effect that such high flows are having on the route. Section 4.3 provides an analysis of side road traffic. Flows have been shown to increase dramatically during the peak periods on

these routes, highlighting the effect that conditions are having on traffic, causing vehicles to reroute onto less appropriate roads.

- 7.2 The details provided in DCC/P/4 provide significant evidence of the inappropriate conditions on the A380 and demonstrate that the road is not fulfilling its function as Regionally Significant Route.

## **8.0 The Scheme will result in traffic congestion at Kerswell Gardens**

- 8.1 A full assessment of the performance of the Edginswell signalised junction in the peak periods in 2028 is provided in David Black's Proof of Evidence (DCC/P/4, paragraph 10.2.20). This concludes that in 2028 'the junction will operate within capacity and without significant queuing or delays at peak times'. The analysis shows that no queuing will occur on any approaches at the end of the green period of the signals; although queues will form when the traffic lights are on red, all vehicles will pass through the signals during the green period (DCC/INQ/35, Sections 4 and 5)

## **9.0 The Scheme is not in accordance with the Government White Paper on the Future of Transport 1998 (contribution by Ian Harrison)**

- 9.1 The Scheme has been developed within the context of the Future of Transport White Paper (1998), as addressed in Ian Harrison's Proof of Evidence (DCC/P/2, Section 3.1). In particular, the Scheme meets the key objectives identified in the document of improving reliability of journeys across all modes, supporting businesses and economic growth and supporting regeneration.
- 9.2 The Scheme will improve journey reliability for all modes by reducing congestion on the A380 corridor and reducing traffic travelling through Kingskerswell village, thus providing an improved route for bus services (as detailed in David Black's Proof, DCC/P/4, Section 12.2).
- 9.3 The Scheme will provide a more resilient transport corridor capable of meeting current travel demand and creating the conditions that will enable the economic growth necessary to stimulate regeneration in Torbay and Newton Abbot (as stated in Ian Harrison's Proof, DCC/P/2, paragraph 3.1.2).
- 9.4 The Scheme has been designed to provide additional capacity to reduce the existing congestion on the A380 corridor and to enable the delivery of the high level of growth planned within the sub-region. The performance of the Scheme and the key junctions will be close to capacity at peak times in the Design Year (2028) showing that sufficient capacity is provided to reduce congestion, but without over providing and encouraging increased car use. The analysis of induced traffic provided in DCC/INQ/28 shows that the Scheme will not induce significant volumes of traffic (only 2% of traffic flows across the Scheme screenline is induced traffic).

## **10.0 The Scheme results in the permanent loss of high grade land (contribution by Peter Williams)**

- 10.1 The loss of high grade land is incorrectly stated by Mr. Bailey. DCC/A/11, Table 2 shows that no Grade 1 land is affected; 18.7 hectares of Grade 2 and 3a land are affected.

## **11.0 The Scheme will not provide more choice about transport modes**

- 11.1 The Scheme should be considered as part of a wider package of measures as proposed in the Local Transport Plan (CD 3.9). The Scheme has been assessed against the objectives set for it in DCC/P/4, table 42 and 43. From the table it can be seen that the Scheme unlocks several opportunities to improve accessibility in the

sub-Region, including the opportunity to enhance public transport provision on the existing road and enhanced walking and cycling provision.

- 11.2 DCC/P/4, table 57 and 58 assess the Kingskerswell Alliance package of measures against the same objectives. The Kingskerswell Alliance package of measures does not provide the same opportunities to improve accessibility and integration. A feature of any online scheme is that, due to the existing congestion, it is not appropriate to reallocate the existing road-space to other modes and therefore will not unlock the same opportunities as the Scheme.

**12.0 The Scheme violates the Eddington and Stern reports as it results in an increase in greenhouse gasses and air pollution (contribution by Bethan Tuckett-Jones)**

- 12.1 The Scheme has been designed to provide sufficient capacity to reduce the current severe congestion on the A380 through Kingskerswell and to enable the high levels of future development planned within the sub-region to be delivered. The Scheme does not over provide capacity (demonstrated by the fact that the Scheme is predicted to be operating close to capacity at peak times in 2028; DCC/INQ/35, paragraph 4.2) and hence does not encourage increased use of the car and significant induced traffic. The analysis of induced traffic provided in DCC/INQ/28 shows that only 2% of future traffic flows across the Scheme screenline is induced traffic.

- 12.2 Bethan Tuckett-Jones's Proof of Evidence (DCC/P/10) provides an assessment of air quality and greenhouse gases. This assessment concludes that:

*'The TAG appraisal for the Published Scheme has shown that the Scheme has a net beneficial impact on local air quality with an overall reduction in exposure to pollution. This is primarily due to the diversion of traffic from Newton Road / Torquay Road through Kingskerswell onto the new link road.'* (DCC/P/10, paragraph 7.4.1) and;

*'In terms of regional air quality, the TAG appraisal shows that there is a slight adverse impact on emissions of regional pollutants and greenhouse gases. However, on a regional scale, the impact of the Scheme on total emissions from road traffic is considered to be neutral.'* (DCC/P/10, paragraph 7.4.2)

- 12.3 The assessment shows that the Scheme improves local air quality through Kingskerswell village, and the regional air quality impact of the Scheme is neutral. The Scheme is therefore not in violation of the Eddington and Stern Reports.

**13.0 The Scheme is not in accordance with the objectives of the Devon Local Transport Plan 2006 to 2011 (contribution by Ian Harrison)**

- 13.1 The Scheme is embedded within the Devon Local Transport Plan (CD 3.9, page 208), and is identified as a key element of the Newton Abbot Transport Strategy. The A380 is highlighted as 'a key element of Devon's Strategic Road Network' (CD 3.9, page 208).

- 13.2 The Devon Local Transport Plan identifies that existing congestion on the A380 through Kingskerswell is causing:

- *'Unpredictable and longer journey times for deliveries to and from businesses, particularly on the A380 through Kingskerswell*
- *A poor operating environment for buses that leads to increased operating costs, fares and timetabled journey times with a consequent impact on patronage levels on certain routes*
- *Reducing the attractiveness of the area to visitors and tourists'* (CD 3.9, page 190)

- 13.3 The Scheme will address all of the above issues by reducing congestion on the A380.
- 13.4 The objectives of the Devon Local Transport Plan are (CD 3.9, page 36):
- Tackling traffic congestion;
  - Delivering accessibility;
  - Making roads safer;
  - Improving air quality;
  - Improving recreation, leisure and tourism;
  - Promoting health and well-being;
  - Improving public spaces.
- 13.5 The Scheme has been shown to reduce congestion on the A380 corridor, and hence improve journey times and journey time reliability (DCC/P/4, Section 12.2). The Scheme will provide a safer route than the existing A380, and hence will save 1,244 accidents (including 22 fatal casualties) over a 60 year period (DCC/P/4, Section 11.4). The Scheme will increase accessibility to Torbay, and will thus support the economy and aid regeneration of the area, as well as developing the tourism industry (DCC/P/5, Section 6). The Scheme will remove 90% of the traffic currently travelling through Kingskerswell village on the A380, and hence will promote health and well-being by encouraging increased walking and cycling in the area as well as having a beneficial impact on air quality within Kingskerswell village (DCC/P/10, Section 7.4)
- 13.6 It is clear that the Scheme is a key element of the Devon transport strategy and meets the objectives of the Devon Local Transport Plan.