

Date: 30<sup>th</sup> March 2025,

The methodology for identifying and selected housing development sites at Broadclyst has caused real concern and worry for residents. There were 370 unhappy or dissatisfied comments in the initial consultation process regarding site LP Brcl 12 and 246 for LP Brcl 29. For context, for LP Brcl 12 this was five times the number of objections than the next most unpopular site (Whimble 11). LP Brcl 12 had twice the number of objections than even the proposed new town near Clyst Honiton.

Despite this, the initial report following the 'sifting of sites' process by EDDC, following the public consultation, stated that had been enthusiasm from council officers for development at these sites, and not a single mention that so many objections had been raised by members of the public. EDDC has since faced public criticism for holding closed doors meetings when making their initial site selections. I criticised this part of the process in one of their public meetings and was subsequently berated by the chair of the council. Councillor Rylance told me immediately after my representation that what I had said was "not cool". We have since complained about her completely unprofessional behaviour.

Residents continue to feel that the initial part of the process was lacking in transparency. How can so many people raise concerns and yet officers of the council can be "enthusiastic" about development about these very same sites? Was the public consultation simply a box ticking exercise for EDDC we wondered? We felt that we were being deliberately ignored.

Plans to build almost 124 homes on the combined sites at LP\_Brcl\_29 and LP\_Brcl\_12 represents significant over-development of the village. We feel that without substantial mitigation, which might not actually be possible in many instances, these sites cannot contribute to sustainability.

Inadequate pavements, high quality agricultural land, heritage concerns, single track roads, insufficient highway capacity, oversubscribed doctors and schools, flooding- all of these concerns have been raised about the sites in Broadclyst, and these very same factors were cited as reasons for EDDC rejecting development at other sites. This made no sense to residents in Broadclyst. The initial EDDC summary assessment made no mention of overhead power lines, or the existing severe traffic bottle necks at either end of our village onto the B3181, waterlogged roads in winter that are impassable or a GP surgery that cannot expand its current premises.

I have witnessed raw sewage overflow onto the fields at Heath cross pumping station which is adjacent to these sites. I have photographic evidence of this. I also understand that there is no plan to upgrade the existing Victorian sewage infrastructure. When I questioned one of the engineers from Southwest water about the prospect of 124 new houses, when he was dealing with the latest one, his comment to me was "The pipes will never cope – it would need a serious amount of new infrastructure."

Residents in Town End in Broadclyst have seen flash floods in recent years, and this too is adjacent to Broadclyst 29. I have video footage of surface water gushing into our property and flooding it. This is a huge concern for us if development at this scale goes ahead.

We recognise that Broadclyst is a particularly attractive village when considering housing development but we still dispute that the scale of what is being proposed meets The National Planning Framework requirement for delivering sustainable development.

The below supporting text, together with images, provides evidence of the severe congestion regarding traffic and lack of footpaths.

*In our opinion, the volume of traffic generated by the sites cannot be accommodated on the local highway network without detriment to road safety.* There are two access points from the B3181 into Broadclyst village. To the west of the village, it is single track country lanes which access the village, and the latter is the proposed sites for development. In our opinion, *there is no sustainable access because there are no formal footpaths.*

### **Maintaining Supply and Delivery**

Broadclyst is also on the edge of the electricity supply network for the area. With the new planning laws requiring low carbon heating and provision of EV charging, the required electricity demand for a development of this size is unlikely to be readily available in such a rural location and the distribution network would need significant reinforcement to be able to meet the needs of the development. There are also over-head power cables in the Southern section of LP\_Brcl\_12.

### **Supporting a prosperous rural economy**

Broadclyst itself is surrounded by country roads, many of which are single track in places and often waterlogged or impassable in Winter. We think it is essential that pedestrian access to both schools is significantly improved although we are worried that in some places, there is no room for pavements.

At present there is a lack of pavements connecting LP\_Brcl\_29 and LP\_Brcl\_12 to both of the schools and the bus stop, and similarly there is insufficient pedestrian access connecting LP\_Brcl\_09 to Clyst Vale College and the bus stop. Unless people feel safe walking to school or to catch the bus, it's far more likely that they will drive. This is currently what is happening already with many of the children who attend the schools, even when parents live within the village itself.

In the most recent edition of our Parish magazine, there was an article about PC Tim Walsh's visit to Town Hill to observe traffic around the Primary school and understand the challenges presented by "a very busy primary school run". It also states that he has written a report outlining his concerns to DCC's Highways Department and asking for a site meeting.

School collection times result in congestion because the local roads were never designed to cope with current traffic volumes. Again, some of the roads going towards the schools are single track, for example the country lane between Town End leading to Burrow Road. The existing lanes often flood in Winter and many are very badly rutted. Adding more cars will make this situation much worse and will not contribute to building a more sustainable community.

*Improvements to the roads to help cyclists must happen if development is to be sustainable.* There are no cycle lanes in the village itself to the main commuter routes to Exeter, and no cycle lane provision on Station Road whatsoever. As mentioned, many of the current lanes are single track, so there is already a conflict between cyclists and cars. There is a joint cycle lane/pedestrian pavement on the B3181 between Broadclyst and Exeter but it is poorly maintained and often so overgrown it forces cyclists onto the main road whenever they encounter branches or people walking.

### **Sustainable Development in Rural Areas**

One of the biggest concerns of residents is that increasing the size of the village will put intolerable pressure on already struggling local services. We feel that development on this scale, far from enhancing the vitality of our community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools, and the GP surgery.

*We believe it's critical to engage both schools in discussion around their capacity issues and have a plan for where the extra children will go prior to approving the proposed development sites.*

*What assurances can we be given that the local surgery will receive the funding it needs to accommodate all the extra patients in Broadclyst village and that developers will engage appropriately with what needs to be delivered?*

### **Flood risk**

Many residents are concerned that part of site LP\_Brcl\_12 is in a flood risk zone. During periods of very heavy rain, water saturates these fields making them particularly boggy underfoot.

In line with sections 159 and 160 of The National Planning Policy Framework *we would like to see an assessment of whether the run-off from surface water, if this site were developed, could potentially increase flood risk of neighbouring properties in Town End and on roads leading up to Burrow Farm.* These properties are already prone to flooding and residents are worried that development at this site will make their situation worse. In Autumn 2023 a flash flood caused the length of Town End to be flooded with water entering properties. Development adjacent to this road is bound to make this phenomenon more common in future.

### **Achieving well-designed places**

Broadclyst is a beautiful village, surrounded by National Trust Land. We are concerned that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In particular, with reference to site LP\_Brcl\_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. *If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Parish Neighbourhood Plan.*

### **Habitats and Biodiversity**

In line with National Planning Policy Statement 180, we believe that any residential development in the countryside often has a harmful impact on biodiversity. Residents are concerned that development at sites LP\_Brcl\_29 and LP\_Brcl\_12 would be on grade 1 agricultural land. Also on sites LP\_Brcl\_29 and LP\_Brcl\_12 there are a number of red and amber listed bird species, some specific to farmland habitat such as skylark and linnet. Bats also use the hedgerows to navigate and the dark skies as cover from predators. Any development at these sites will be detrimental to these species by removing specific habitat, removing their navigation method and increasing the ambient light.

There is a pond on site LP\_Brcl\_12, the loss of which would be detrimental to wildlife. We would like to see this feature maintained. One of the nearby cottages is a designated site for Great Crested Newts.

*In the Cylst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP\_Brcl\_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead. There are a number of significant habitats near the proposed sites including Ashclyst Forest and Elbury Farm, the first is nationally important for butterflies and the second for rare fungi and Barn Owls. We also feel that given the numbers of bats that have been seen in the Town End area, a survey focussing on this species in particular would be beneficial.*

In 2023, Land Vale Alliance instructed Grassroots Planning (a private consultancy firm) to provide an opinion on whether an "Environmental Impact Assessment" was necessary ahead of LP\_Brcl\_12 going to the planning application stage. They came to the conclusion that no such assessment was necessary. We wonder how such an opinion can ever be considered to be unbiased, when its the company that stands to cash in, instructing and paying the fee for another firm to conduct such an assessment?

They made the following points which we completely disagree with;

- no highway safety issues
- sufficient capacity to accommodate extra traffic
- good provision of walking and cycling routes to and from the site to public transport and schools (*not unless they are prepared to put in a pavement and cycle lane the length of Whimple Road and also acknowledge the local schools are both way over their capacity*)
- no anticipated issues with regard to flood risk
- no significant environmental impact on landscape and visual resources

Thy went on to comment that "*The existing facilities within Broadclyst may experience some increase in usage but this is unlikely to be significant given the scale of the development...and is likely to benefit the local economy through increased use of existing services*". They don't live here. We do. We cannot understand how any such statement could be made and they have clearly not consulted with residents about the existing pressures on services and infrastructure.

Figure 1:

Sewage overflow at the East of Winter Gardens (site LP\_Brcl\_12)



Figure 2: Single Track Lane at Town End with pupil walking towards the primary school (adjacent to site LP\_Brcl\_29)



Figure 3a and b: Town Hill, near Broadclyst Primary school. No footpaths on this section (a). Parents and children are walking on the road, to and from their cars parked on Town End (b).



Figure 4: Rush hour outside Clyst Vale Community College. In the distance there are pupils walking on the road due to get to the bus stop due to a lack of footpaths.



Figure 5: Flooding near Burrow Farm: vehicle attempting to drive through flood water.

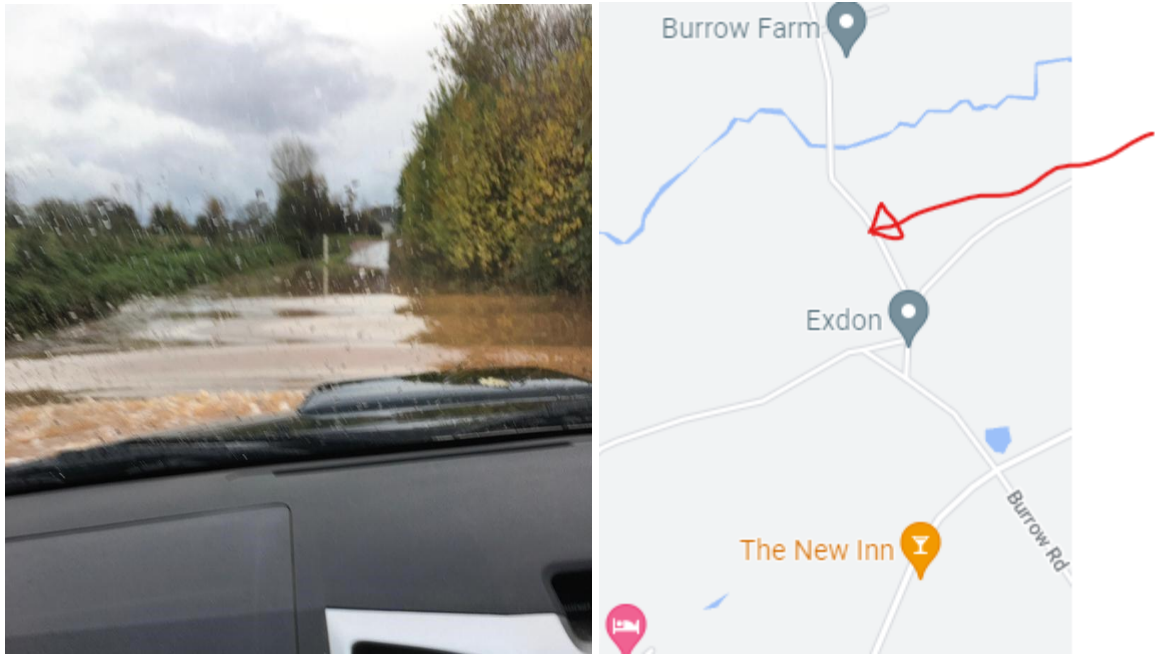


Figure 6: Town End Road under water (17<sup>th</sup> September 2023)

