

BRAUNTON PARISH COUNCIL

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22 December 2023

Devon County Council
Legal Services G03
County Hall
Topsham Road
Exeter
EX2 4QD

REFERENCE: imr/dev001/631

Dear Devon County Council (DCC) Legal Services

Braunton Parish Council (BPC) objects to DCC (Various Streets, Braunton) (Waiting Restrictions) Amendment Order.

Schedule 1.001 No Waiting At Anytime – Caen Street, Braunton (i) – (v) and Exeter Road, Braunton (i) – (iii).

Schedule 3.034 No Loading 8am – 10am and 4pm – 6pm – Caen Street, Braunton (i) & (ii).

Schedule 4.108 Limited Waiting 8am – 6pm 30 Minutes No Return Within 1 Hour – Caen Street, Braunton (i).

The proposed amendments to the above draft Orders are not clear as there are no accompanying maps showing the proposed amendments.

BPC would request clarification regarding the amendments so that it can consider what, if any, impact they will have on the local community and local businesses.

Schedule No. 5.138 Pay & Display (Tariff Braunton A) 9am – 6pm Max Stay 2 Hours (i) – (v).

BPC strongly objects to the introduction of the proposed on-street parking management scheme on Exeter Road, Braunton.

DCC claims that these restrictions will manage congestion, improve air quality, provide a safer environment for pedestrians and cyclists and maintain reasonable access to premises. The County Council have failed, despite several requests from the Parish Council, to provide any evidence supporting the need for the proposed scheme in Braunton.

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BPC attended meetings with County officers during 2022 and were told the scheme details would be, as follows:

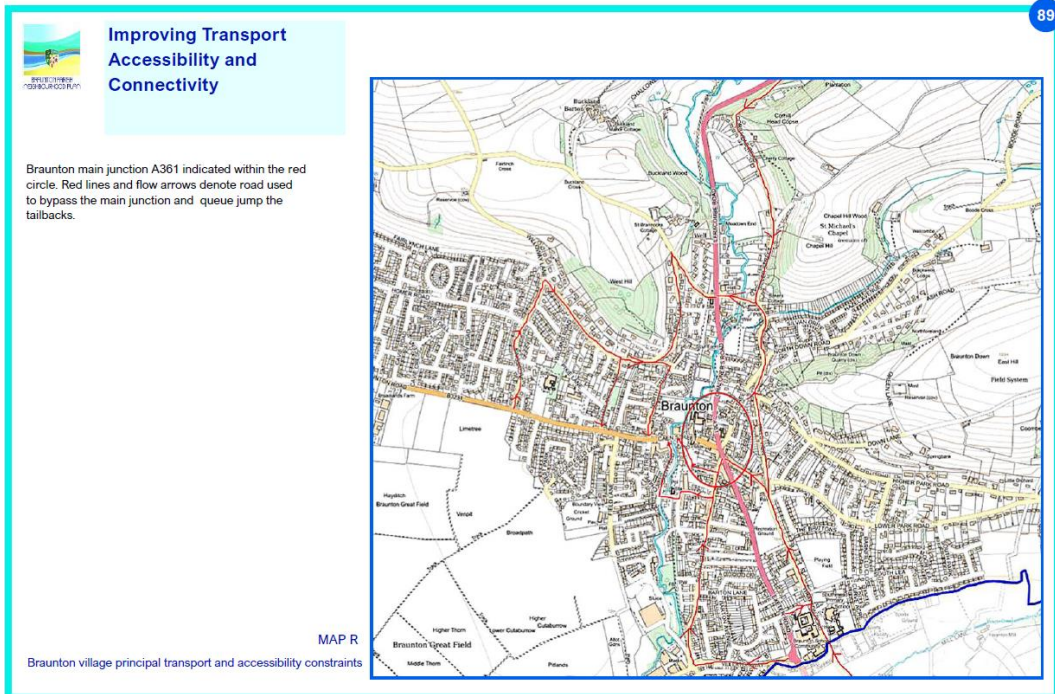
- There will be one Pay and Display (P&D) machine on Exeter Road.
- The P&D machine will be 'cash only'.
- The first hour will be free but motorists will need to obtain a ticket from the P&D machine and display it in their vehicle.
- 2 hours stay will cost £0.80, with no return in one hour.
- It is unclear if after the first free parking hour whether motorists have to move their vehicle for an hour or can the owner purchase a follow on ticket meaning the vehicle can park for 3 hours in total.
- The existing taxi rank will be extended doubling in size.
- The parking restrictions will apply 365 days per week, from 9am to 6pm.
- There will be no provisions for a loading/unloading bay

BPC disagrees with DCC's justification for introducing the proposed parking restriction scheme on Exeter Road. The reasons for this are set out below.

Manage Congestion:

This proposal will not manage congestion in Braunton. County officers have explained that the proposals are for communities which do not already have (or have very little) pay and display. The proposals are located in busy town centres where vehicles often spend time circulating looking for parking places and where off-street parking is available.

South Street is a one-way street and you cannot exit south bound from the village centre. Braunton also has a four-way traffic light system on The Square which causes queuing traffic along the A361. This is evidenced in the Braunton Neighbourhood Plan, 4 – Built Environment, pg. 89.



Made Version September 2023

Link to view the Braunton Neighbourhood Plan, 4 – Built Environment

<https://www.brauntonparishneighbourhoodplan.org.uk/wp-content/uploads/sites/148/2023/11/neighbourhood-plan-4-Built-environment-Made-Version-September-2023.pdf>

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The Parish's long stay car park, known as Caen Street Car Park, is located via South Street (before you reach the one-way system) and can also be accessed via Caen Street. If DCC want to prevent unnecessary vehicle journeys around the village this would be better achieved by improving the existing poor directional signage to Caen Street Car Park. The signage on Exeter Road is a small 'P' stuck in the bottom lefthand corner of an existing highway sign. Directional signage to the car park in South Street and Caen Street is non-existent.

There is no evidence to support the County's claims that vehicles are overstaying on Exeter Road. A Freedom of Information (Fol) request dated 6 September 2023 published on the County Council's website [Parking on the A361 in Braunton - Freedom of information \(devon.gov.uk\)](https://www.devon.gov.uk). Confirms that only 28 Penalty Charge Notices (PCNs) were issued to vehicles for overstaying in Exeter Road covering a period of 12 months from August 2022 to July 2023. This provides evidence that there is no issue with vehicles overstaying on Exeter Road under the existing on-street management scheme.

Improve Air Quality:

DCC have not provided any evidence to show that this proposed on-street parking scheme will improve air quality. Braunton has a declared Air Quality Management Area (AQMA) and the County have not engaged with the Air Quality Technical Working Group (TWG) regarding this proposal in Braunton. Nor have the County Council provided any modelling data to show the level of improvement that this scheme would have on the air quality in Braunton.

Provide a safer environment for pedestrians and cyclists:

At a meeting with a County Officer on the 16 August 2023, the Parish Council were told that the County intend to only supply one P&D machine on Exeter Road. At a subsequent meeting with County officers on the 22 November 2023, the officers advised that the P&D machine would be 'cash only'. This would mean that motorists would have to walk to the P&D machine to pay and obtain a valid ticket (including for the first free hour). This would increase the footfall on Exeter Road causing further obstructions to pedestrians. Therefore, the proposed scheme would not provide a safer environment for pedestrians.

As stated in the Braunton Masterplan,

"There are cycle way provisions on road and off road, connecting the Tarka Trail Route 27, however, further towards Braunton Village centre, these cycle lanes abruptly stop." "The approach to Braunton Recreation ground on the right, with a petrol station to the left, the cycle lane in bound resumes for a short while before again coming to an end. From thereon there is dedicated on street parking continuing along into the village centre."

(Source: AECOM, pg. 20).

It is not clear how the County's proposed on-street parking scheme would provide a safer environment for cyclist when there are no provisions for cycleways.

One of the issues and constraints identified in the Braunton Masterplan is that on-street parking reduces opportunities for cycleway provision. There are opportunities within the Masterplan to improve Exeter Road but if the County's proposed on-street parking scheme goes ahead, these opportunities would be jeopardised, including:

- Continuous on-street car parking bays could be interrupted by build-outs of shrub planting beds and/or rain garden opportunities to reduce surface water run-off from the carriageway to promote SuDs and aid flood relief from the

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carriageway and further into the village. These could accommodate street tree planting opportunities.

- At key points there could be build outs to provide street seating for public and for business use, in particular for cafes/eateries. This would also widen out the pathways in places to reduce vehicle dominance.

(Source: AECOM, pg.21)

It is disappointing that the County Council have not engaged with BPC regarding its Braunton Masterplan to discuss potential improvements to the village. The introduction of this proposed on-street parking scheme along Exeter Road will not support the opportunities identified in the Masterplan.

Maintain reasonable access to premises:

DCC have failed to provide any evidence to support its claims that the proposed on-street parking scheme will maintain reasonable access to premises. The Fol request dated 6 September 2023 confirms that there have been no recorded issues from residents or businesses experiencing difficulty accessing their premises.

How many letters or complaints have you received from residents and businesses in Braunton that people are overparking along this section of the A361 in the past 5 years (by year).

Our Civil Parking Enforcement Team, has received zero complaints relating to overparking on the A361 in the last five years. Our Customer Relations Team have searched for the term "A361" resulting in 33 complaints in the last five years, but none of these related to overparking.

(Fol, 6 September 2023)

Evidence:

At a meeting with County officers on the 22 November 2023, officers stated that evidence was based on conventional wisdom and advice from officers. If no officers have engaged with the Air Quality TWG or BPC regarding its Masterplan, where is this conventional wisdom and advice coming from?

At the same meeting we were told that tangible evidence was based on levels of contraventions. It is clear from the Fol request dated 6 September 2023 that there is no evidence regarding levels of contraventions to support this proposed scheme.

In addition to the Fol, an email received from a County Officer dated 29 November 2023, showed the level of contraventions for the eight communities affected by the County's on-street parking proposals, including Braunton, over the past 12 months. The Officer stated,

"It is fair to point out the outlier, Braunton, where there is a much lower contravention rate (14.6%) within LW. There could be a number of reasons for this including a good level of compliance amongst visitors. Although it is worth noting that there is a relatively small amount of LW and with limited other duties officers will move between communities to make best use of their time, i.e. moving between Braunton and Georgeham and Croyde, this can mean that opportunities to provide a good attendance to limited waiting can be missed."

The table below was provided by County officers to show the level of contraventions across the eight affected communities over a 12 month period.

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Community	Total PCHs	01 Parked in a restricted street	02 Loading in restricted street	05 Parked after payment expired	11 Parked without payment	12 Parked in a residents' place	16 Parked in a permit space	19 Parked in a residents' place	21 Parked in a suspended bay	22 Re-parked in the same place	23 Wrong class of vehicle	24 Not parked correctly	25 Parked in a loading place
Braunton	171	124	3								1		8
Crediton	806	269	26								5	2	53
Dartmouth	1839	521	217			16	29		22		5	6	26
Honiton	667	230	32								4		41
Okehampton	590	150	30								4		46
Salcombe	945	212	31		2	77	16	13					
Sidmouth	779	240	89	6	13		21		58		2	22	74
Tavistock	1173	319	161								12	10	152
	6970												

From the Fol dated 6 September 2023, and subsequent email from a County Officer dated 29 November 2023. There appears to be no tangible evidence of contraventions in Braunton to support this proposed on-street parking scheme in Exeter Road.

Need:

DCC have failed to provide evidence to support a need for this proposed on-street scheme in Braunton. The County Council have failed to provide the Parish Council with an evaluated implementation cost, projected income and proposed expenditure plan specific for Braunton. It is difficult to see how the capital infrastructure costs and ongoing management and enforcement of the proposed scheme would be financially beneficial to the County Council. Let alone subsidise surplus services as suggested in the County's proposal. The County Council agree that this proposal is a relatively small amount of LW, at best it might serve 15 to 20 parked vehicles. How can DCC spend public money on implementing this scheme in Braunton without a robust costed plan?

This proposed scheme will be detrimental to the local businesses and will offer no benefit to the community in terms of congestion or better air quality. It will not make it safer for pedestrians or cyclists, it will only cause further obstruction due to more footfall from pedestrians walking up and down Exeter Road to obtain tickets from the P&D machine. If the County Council really did want to improve congestion and air quality in Braunton. This would be better achieved by improving active travel routes such as safe cycleways and improving the existing poor and inadequate directional signage to the Parish's long stay car park.

DCC have not provided the evidence to justify that the introduction of the on-street parking scheme in Braunton as per Schedule No. 5.138 will improve turnover, reduce congestion, improve safety of pedestrians and cyclists or improve access to premises. The proposal should not be implemented.

If the County proceed with implementing this scheme when there is no evidence to support the need for it. The Parish Council can only conclude that the motive is money and that the County Council will profit to the detriment of our community and local economy.

Schedule No. 7.001 Disabled Badge Holders Only at Any Time – Exeter Road, Braunton (i).

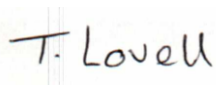
Taxi Rank:

The Order proposes to increase the existing taxi rank doubling it in size, which appears to move and reduce the size of the existing disabled bay. The County Council have not provided any evidence to support increasing the taxi rank and North Devon Council Licensing have not been advised of DCC's plans for another additional rank in Exeter. Braunton has no licenced taxis it only has private hire vehicles which are not permitted to use a taxi rank. A North Devon Council Licensing Officer has confirmed that a number of the licensed trade have advised that they would use the rank if they could get

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onto the rank which is often abused by private car drivers parked on it with some leaving their vehicle all night. It would appear that the issue relating to the taxi rank is due to DCC neglecting its duty to enforce the current on-street parking scheme. It is difficult to see how increasing the length of the taxi rank will avoid misuse at night as the County will not carry out enforcement between 6pm and 9am.

Yours sincerely



Tracey Lovell
Clerk to the Council

cc.

Cllr. Selaine Saxby, MP North Devon

Cllr. Pru Maskell, Devon County Council & North Devon Council

Cllr. Elizabeth Spear, North Devon Council

Cllr. Graham Bell, North Devon Council

Cllr. Simon Maddocks, North Devon Council