



**Devon Countryside Access Forum  
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Mr N Nicholson  
Senior Engineer  
WSP  
Keble House  
Southernhay Gardens  
Southernhay East  
Exeter EX1 NT

30 August 2022

Dear Mr Nicholson

**Consultation for a Walking, Cycling and Horse Riding Assessment (A382  
between Newton Abbot and Drumbridges Junction)**

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CRoW Act). Its statutory remit is to give independent advice “as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area...” Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice, and this includes county councils.

The DCAF currently has nineteen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.

Thank you for consulting the Devon Countryside Access Forum on major road improvements between Newton Abbot and Drumbridges Junction. Improvements to this very busy road to facilitate walking and cycling will encourage sustainable transport and enable more people to enjoy recreational access to reach areas such as the Wray Valley Trail and Stover Country Park.

The Forum has a few advisory comments to make of a general nature which will hopefully inform the development of this project.

The Devon Countryside Access Forum is a local access forum. It is required, in accordance with Sections 94 and 95 of the Countryside and Rights of Way (CRoW) Act 2000, to provide advice as to the improvement of public access to land for the purposes of open-air recreation and enjoyment.

### ***Vulnerable users and crossing points***

Where there are crossing points over junctions and roundabouts, the Forum advises that these should be fully assessed for disability access, for example drop kerbs and change of surfacing. The Position Statement on Disability Access prepared by the Forum states that those with limited mobility might include “parents with children in buggies; elderly or frail people, who might use an electric mobility scooter or wheelchair; and people with walking aids.” Designs of pedestrian/cycle crossings should give clear priority to walkers and cyclists.

The Position Statement on Disability Access also makes reference to the Highway Code. “Design and improvement work on roads to encourage non-motorised users and sustainable travel should reflect the hierarchy in the Highway Code, rule 204. This acknowledges that road users most at risk in order of vulnerability are pedestrians, in particular children, older adults and disabled people, cyclists, horse riders and motorcyclists.”

The drawings do not show any proposed pedestrian priority/continuous crossings. To encourage use pedestrians should have priority. The lack of continuous crossings creates issues for cyclists too as they need to check for cars at every junction. The Forum advises that one way to deal with this would be to move the crossings further away from the road, increasing the time for vehicles and pedestrians to navigate one another, and improving the visibility angles.

Traffic management may be a particular issue at Stover Country Park and careful consideration needs to be given to the design of the pedestrian/cycleway at the well-used entrance to the Park, south of Drumbridges roundabout, in order to mitigate risk to walkers, cyclists and other trail users. Vehicles entering and existing the Park from and onto the new dual carriageway will be directly crossing the pedestrian/cycleway. This presents a particular risk as vehicles would enter the Park whilst pedestrians and cycles are also travelling south. Planned improvements to Stover Country Park, subject to funding, are likely to increase visitor numbers either coming by car or using the proposed footway/cycleway.

It is not clear whether the pedestrian /cycle crossing facilities at the planned roundabouts will be traffic light controlled or whether other management arrangements are envisaged to help provide safe crossing points. It would be useful to understand the design intent for any controlled crossings across the scheme and the Devon Countryside Access Forum would appreciate clarification on this matter.

### ***Segregation from traffic***

It appears from the drawings that there will be a verge separating the footway/cycleway from the road, except at junctions and roundabouts. It would be helpful to know what degree of protection this will give to vulnerable users on the footway/cycleway. At points the verge appears narrow and a wider buffer with trees/planting would increase the desirability of the route and decrease perceptions of vulnerability. Some appropriate landscaping and planting would also retain some of the local character.

### ***Segregation of cyclists and walkers and safety***

This will be a busy route for commuting and leisure cyclists and walkers. The 3m wide track is noted. It is not clear whether there will be any segregation of walkers and cyclists by either surface or markings to encourage responsible use of the route. Further information on this point would be helpful. It is likely that the route will also be used by dog walkers. Although the route is on-road, an advisory statement compiled by the Forum in relation to trail safety is also pertinent in that this states design should try to ensure that the behaviour of one user does not interfere with the "safety or perceived safety of the other user."

### ***Equestrian use***

The consultation refers to a walking, cycling and horse-riding assessment. There does not appear to be any consideration of equestrian use and the Devon Countryside Access Forum advises that this would be invaluable as the Wray Trail permits horse use as does the crossing over Drumbridges roundabout. Multi-use is the preferred option of the Forum and Devon County Council, whenever this can be achieved, and reasons should be provided if this is not an option. As well as the route itself, a review of multi-use should include an assessment of the roundabouts for safe crossing by equestrians as these might give the opportunity for horse-riders using the adjacent minor road network to cross safely, even if there are few bridleways in the vicinity.

### ***Bridge and ramp design***

Although the Forum did not have sight of the drawings for this part of the project, it is vitally important that the bridge and ramp design safely accommodates all users. The needs of disabled people are key in this regard.

The recent publication from the Department of Transport on inclusive mobility (2022) states "The Countryside for All Good Practice Guide: A guide to Disabled People's Access in the Countryside defines two main types of non-urban context in which its recommendations apply: 'Urban fringe and managed landscapes', such as countryside areas near towns or managed recreation sites; and 'Rural and working landscapes', such as farmland and woodland with public rights of way. It recommends that there should be a resting place at least every 200 metres in 'Urban fringe and managed landscapes' and at least every 300 metres in 'Rural and working landscapes'. The gradient of paths in these two contexts should not exceed 1 in 12 and 1 in 10, respectively. There should also be level landings provided on all paths that have a gradient in excess of 1 in 20. Each landing should consist of a space with minimum dimensions of 1200mm (wide) x 1500mm (long), and a landing should be provided for every 750mm of vertical climb." [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure \(publishing.service.gov.uk\)](#)

The Sustrans Greenways Design Guide (point 9.13) states that any access point should have a minimum clear width of 1.5 metres. In addition, any access point should be able to accommodate the design cycle vehicle (which is 1.2 metres wide x 2.8 metres long) [Sustrans traffic-free routes and greenways design guide - Sustrans.org.uk](#) A design cycle vehicle might include a tandem, cargo bike or wheelchair friendly tricycle.

The Devon Countryside Access Forum would welcome sight of detailed drawings for

these when appropriate, but it would have been helpful if full information could have been considered at the same time.

The Forum would have appreciated the opportunity to make comments at an earlier stage in the process on all the above matters.

This response will be on the agenda of the Devon Countryside Access Forum's next meeting on 19 September for formal approval.

The Devon Countryside Access Forum trusts that its response will be taken into consideration and requests feedback on the matters that have been raised.

Yours sincerely

A solid black rectangular box used to redact the signature of Hilary Winter.

Hilary Winter  
Forum Officer

*Letter sent on behalf of the Devon Countryside Access Forum*

*Chair: Sarah Slade*

*Vice Chair: Chris Cole*