

Impact Assessment



Assessment of: M5 Junction 28 and Town Centre Relief Road

Service: Planning – Climate Change, Environment and Transport

Head of Service: Jamie Hulland

Version / date of sign off by Head of Service: 1 March 2024

Assessment carried out by (job title): Vaani Shokar – Graduate Trainee
Transport Planner

1. Description of project / service / activity / policy under review

Cullompton is a market town within the Mid Devon district, located adjacent to the M5 motorway which acts as the main travel and economic corridor for the South West of England. Cullompton Town Centre holds significant historic importance with several listed buildings, however Historic England designated the town as being at risk to congestion issues due to the prevalence of vehicles.

M5 Junction 28 is a major junction that experiences extremely high traffic flows in Cullompton. The six-arm eastern roundabout often experiences queues onto the M5 slip road because of queuing back from the High Street in the evening, posing increased risks to road safety. Moreover, delays caused by congestion at/through Junction 28 affects access out of Cullompton via B3181 Station Road in the morning. Current plans to deliver the Culm Garden Village housing development will further exacerbate congestion issues.

The High Street is also dominated by vehicles which has led to Cullompton being designated an Air Quality Management Area (AQMA). This, in addition to narrow pavements leads to the High Street being an unpleasant experience for pedestrians and cyclists.

2. Proposal, aims and objectives, and reason for change or review

Proposals

The preferred proposal would see the provision of a new motorway junction to the south of the existing M5 Junction 28. This new junction will include south facing slip roads connecting onto the M5 motorway and provide a connection to the proposed Cullompton Town Centre Relief Road.

The new junction will connect directly into the proposed Culm Garden Village development site to the east with the western end of the scheme connecting into the existing Cullompton road network and the town centre providing a high-quality link road with associated active travel and public transport provision. This will provide a segregated walking / cycling route between the new development to the east and the existing Town Centre to the west.

The Town Centre Relief Road will connect Duke Street in the south to Station Road in the north, with a fourth arm added to the Millennium Way roundabout. The route will pass through the public open space and sports pitches, staying close to the railway line to avoid additional disruption to the Cullompton Community Association fields. The cricked club will be relocated to the east of the M5, with reconfiguration of the bowling club and football pitches within the existing area. This scheme also includes upgrades to the walking and cycling routes through the CCA fields and additional links along Meadow Lane to the Community College. This will help remove traffic from the Town Centre, making it more pedestrian friendly.

The reliability of the bus services through the town will be improved with less traffic and congestion and additional services will be delivered by the new development. A bus layby on Station Road will also be provided for the Falcon Bus.

Scheme Objectives

The proposed improvements aim to:

- Support efficient and safer operation of the Strategic Road Network (SRN).
- Support efficient and safer operation of the local transport network.
- Support the opportunity for existing and new residents to make sustainable travel choices.
- Minimise negative environmental impacts including carbon, water and other environmental impacts.
- Support delivery of the development within Local Plan and longer-term proposals at Culm Garden Village.

3. Limitations and options explored (summary)

Limitations

- **Physical restrictions:** proposed improvements will have to take into account the close proximity to the railway line and flood plain, increasing the cost of the scheme to mitigate these issues. Liaison with statutory bodies such as Network Rail, National Highways and Environment Agency has already begun and will continue throughout the development of the scheme.
- **South Facing slip roads:** the proposed option details the construction an additional junction south of J28. The location of the proposed scheme close to the original junction means there is insufficient room to install north facing slip roads as per guidance and safety concerns. Locating the junction further south is not an option given the railway gets closer to the M5 and it would not be possible to construct a new slip road any further south. A southern junction with southern facing slip roads was chosen over a northern junction with northern facing slip roads due to more traffic travelling to/from Exeter.
- **Environmental Limitations:** The proposed Town Centre Relief Road will run through the Cullompton Community Association (CCA) fields. A road in this location would be fully within the floodplain and given the significance and severity of the water courses in the area, would need to be closed during times of flooding.

Options Explored

A number of improvement options have been considered with technical work being carried out to consider the impacts of each one. 25 options were explored, with each having challenges in terms of delivery given the proximity of the railway, M5 and floodplain. These ranged from:

- Constructing additional transport infrastructure on the existing junction, such as additional bus/pedestrian/active travel bridges.
- Alterations to existing roundabout through the introduction of signals and bus prioritisation.
- Alternative locations for a new junction
- Construction of mobility hubs with additional bus lanes, improved active travel infrastructure and improved facilities for intermodal connections.

Preferred Option

The preferred option was chosen as it provides an effective connection to the proposed Culm Garden Village and the SRN, as well as reducing pressure on the current junction infrastructure. Moreover, priority to buses on the local road network, specifically on new links crossing the motorway and through the High Street (where traffic levels will reduce), will reduce journey times and improves passenger experience. It was considered the most deliverable of all the options that met all of the objectives outlined above and supported by

discussions with key stakeholders.

A scenario in which nothing is done has been considered. However, given that the current junction is approaching capacity and additional developments are yet to be completed, the queuing at the current Junction and High Street will only increase. Without an improvement scheme, further development in Cullompton would not be possible.

4. People affected, diversity profile and analysis of needs

The people potentially affected by the proposals are principally those living and working in Cullompton and the surrounding Mid Devon area. Therefore, their diversity profile is presented below, with Devon and England overall used as comparators.

Age

Table 1 illustrates the percentage of the population broken down by age, in Cullompton and Mid Devon, compared to Devon and England.

Table 1: Age (Census, 2021)

Geography	% Age 0-19	% Age 20-64	% Age 65+
Cullompton	19%	61%	20%
Mid Devon	18%	58%	24%
Devon	20%	54%	26%
England	23%	58%	18%

Table 1 shows that Cullompton is similar to Devon in age structure but does have slightly higher proportion of working age people which links to the higher number of commuting trips seen in the town.

Sex

Table 2 details the percentage of the population broken down by gender, in Cullompton and Mid Devon, compared to Devon and England.

Table 2: Sex (Census, 2021)

Geography	Female	Male
Cullompton	50.9%	49.1%
Mid Devon	51.2%	48.8%
Devon	51.5%	48.5%
England	51%	49%

As in England overall, there were slightly more females than males in Cullompton with females making up 50.9% of the population. This is reflected similarly in Mid Devon and Devon as a whole.

Ethnicity

Table 3 illustrates the percentage of the population broken down by ethnicity, in Cullompton and Mid Devon, compared to Devon and England.

Table 3: Ethnicity (Census, 2021)

Geography	% White	%Mixed/multiple ethnic groups	%Asian/Asian British	%Black/African/Caribbean/Black British	%Other ethnic group
Cullompton	96.8%	1.4%	1.4%	0.2%	0.3%
Mid Devon	97.8%	1.1%	0.7%	0.1%	0.3%
Devon	96.4%	1.4%	1.5%	0.3%	0.5%
England	81%	3%	9.6%	4.2%	2.2%

Cullompton, Mid Devon and Devon are lower in ethnic diversity than the national average.

Health and Disability

Table 4 shows that Cullompton and Mid Devon have similar health and disability levels when compared to averages of Devon and England.

Table 4: Disability and General Health (Census, 2021)

Geography	% Activities limited a little by disability	% Activities limited a lot by disability	% Not disabled under the Equality Act	% Very good and good health	% Fair health	% Very bad and bad health
Cullompton	11.1%	7.7%	81.2%	81.2%	13.9%	4.9%
Mid Devon	11.3%	7.2%	81.5%	82.0%	13.2%	4.8%
Devon	11.1%	6.9%	82%	83.4%	12%	4.6%
England	10.2%	7.5%	82.3%	81.7%	13%	5.3%

Socio-economic status

Table 5 shows the levels of deprivation in Cullompton and Mid Devon compared to Devon and England as a whole.

Table 5: Household Deprivation (Census, 2021)

Geography	% Household is not deprived in any dimensions	% Household is deprived in one or two dimensions	% Household is deprived in three or four dimensions
Cullompton	47.3%	50.2%	2.5%
Mid Devon	49.1%	48.1%	2.7%
Devon	49.6%	37.6%	2.8%
England	48.4%	47.7%	3.9%

Whilst Devon as a whole has less deprivation than England, both Cullompton and Mid

Devon have slightly more households deprived in one or two dimensions compared to the national average. However, both Cullompton and Mid Devon show lower proportions of households deprived in three or four dimensions than averages in both Devon and England.

5. Stakeholders, their interest and potential impacts

There are a number of different stakeholders involved and consulted on through the development processes. These include:

- Mid Devon District Council
- Cullompton Town Council
- Network Rail
- National Highways
- Environment Agency
- Local Businesses
- Members of the Public
- Bus operators

All these stakeholders have been engaged as the scheme has progressed, either directly or through the recent public engagement events. All of their comments have been considered when choosing the preferred option.

6. Additional relevant research used to inform this assessment

- National Travel Survey (2022)
- Census (2021)

Additionally, information has also been derived from internal DCC documents and cabinet reports.

7. Description of consultation process and outcomes (Public engagement)

A public consultation was held between 13 December 2023 and 5 February 2024, inviting residents to give their opinions on the proposals for the relief road and new motorway junction. Respondents had the opportunity to provide feedback via an online survey, email, telephone, or letter. The purpose of this consultation was to find out if the local people supported the intervention being proposed and evidence this for the submission of the Business Case. Comments received on small changes to the design will be considered as the project progresses.

Additionally, two public drop-in events were held to give respondents the opportunity to ask questions relating to scheme in person. An evening event between 15:30-19:00 on Monday 8 January 2024 at Cullompton Community Centre, and an afternoon event between 12:00-16:00 on Wednesday 10 January 2024 at Cullompton Library.

Headline results

868 responses were received from members of the public and a further 16 from local organisations.

Overall:

- 92% (815 of a total of 884) support the need for a town centre relief road.
 - 95% (838 of a total of 884) support the need for improvements to M5 Junction 28.
 - 79% (698 of a total of 884) support the proposed option for junction improvements.
-

Background information

8. Equality analysis

Under the Equality Act 2010, the local authority must consider how people will be affected by a service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations across protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (for work), sex, sexual orientation, race, and religion and belief. The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are: informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations; proportionate (negative impacts are proportionate to the aims of the policy decision); fair, necessary, reasonable, and those affected have been adequately consulted.

- a) Is this group negatively or potentially negatively impacted, and in what way?
- b) What could be done or has been done to remove the potential for direct or indirect discrimination, harassment or disadvantage and inequalities?
- c) In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?
- d) What can be done to advance equality further? This could include meeting specific needs, ensuring equality of opportunity and access, encouraging participation,

empowering people, making adjustments for disabled people and action to reduce disparities and inequalities.

- e) Is there a need to foster good relations between groups (tackled prejudice and promote understanding) and help people to be safe and protected from harm? What can be done?

All residents by geographic area

The proposals will likely impact residents and employees of Cullompton, residents and employees of the surrounding area, and users of the M5 motorway.

Some traffic disruption is to be expected for most residents in Cullompton during the construction of the scheme, due to an increase in construction vehicles, traffic management, road closures and diversion routes. However, this will be kept to a minimum through a construction management plan.

Age

Improvements made to the junction and relief road will benefit anyone, of any age, who uses private cars, motorcycles and public transport by reducing traffic waiting times and improving user experience. The additional active travel provision and connections will also help age groups who are more reliant on walking and cycling and the reduction in traffic in the town centre as a result of the proposals will improve the pedestrian environment. Thus no age group is particularly negatively impacted by the scheme.

Disability (includes sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people

The proposed improvements will improve the highway network for all road users. Diverting traffic from the current High Street will benefit people who require additional support in navigating public spaces, improving safety and user experience for those affected. With reduced traffic in the town centre and a less polluted, quieter environment, it can benefit people who are autistic or have other similar sensory and cognitive impairments with less chance of experiencing uncomfortable sensory overload.

Race and culture: nationality/national origin, ethnic origin, skin colour, religion and belief, asylum seeker and refugee status, language needs

Improvements made to the junction and relief road will benefit all ethnicities who use private cars, motorcycles and public transport. The additional active travel provision and connections will also help ethnic minority groups who are often more reliant on active travel and public transport modes for travel. No particular ethnic group is expected to experience any negative impacts as a result of the proposals.

Sex and gender identity and reassignment (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)

Improvements made to the junction and relief road will benefit anyone, of any sex/gender identity, who uses private cars, motorcycles, public transport, and active travel. Therefore it is not expected that any sex or gender identity in particular will be negatively impacted.

Sexual orientation, and marriage/civil partnership if work related

The proposed scheme is not expected to cause any negative impacts to anyone based on their sexual orientation or marriage/civil partnership status.

Other relevant socio-economic factors and intersectionality

This includes, where relevant: income, housing, education and skills, language and literacy skills, family background (size/single people/lone parents), sub-cultures, rural isolation, access to services and transport, access to ICT/Broadband, children in care and care experienced people, social connectivity and refugee status/no recourse to public funds. Also consider intersectionality with other characteristics.

Cullompton is more deprived than Devon as a whole, with 52.7% of the population deprived in some dimension (Nomis, 2021). The scheme will improve the highway network for all modes of transport, which will improve access to education and employment opportunities.

9. Human rights considerations:

We need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).

It is not considered that there are any relevant human rights considerations. However, improving transport infrastructure may enable individuals to exercise human rights more easily, such as the right to employment or the right to education (both enshrined in the Universal Declaration of Human Rights) by improving access to employment/education by all modes of travel.

10. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 11, otherwise complete the environmental analysis information below):

Devon County Council's Environmental Review Process	
Planning Permission	X
Environmental Impact Assessment	X
Strategic Environmental Assessment	

- a) Description of any actual or potential negative consequences and consider how to mitigate against these.
- b) Description of any actual or potential neutral or positive outcomes and consider how to improve as far as possible.

Conserve and enhance wildlife

The installation of the proposed junction and Town Centre Relief Road will require construction of road infrastructure on existing fields, grass areas and woodland areas. The utmost provisions will be put in place in order to minimise adverse impacts on the surrounding wildlife and ensure measures to further conserve the local environment are established following the construction of the proposals. An Environmental Impact Assessment will be carried out to support the future planning application, identifying potential impacts on the environment and providing appropriate mitigation where required.

Safeguard the distinctive characteristics, features and special qualities of Devon's landscape

No negative consequences. No direct outcomes.

Conserve and enhance Devon's cultural and historic heritage

Impacts to Devon's cultural and historical heritage is minimal, the extent to which relates to the relocation of Cullompton's bowling green and football pitch. Removing traffic from the Town Centre will improve the setting of listed buildings within the area.

Minimise greenhouse gas emissions

During construction it is to be expected that greenhouse gas emissions are to increase slightly as a result of the construction process. Maintenance and construction vehicles will likely be one of the main contributing factors to this increase. Additionally, the presence of diversions and road closures present during to construction process will also contribute further gas emissions.

However, following construction the number of idling cars should reduce as traffic flow is improved and congestion is reduced and will more than offset the negative impacts during construction. The improvements to walking and cycling routes will also encourage a shift to sustainable travel modes from private cars.

Minimise pollution (including air, land, water, light and noise)

Noise disruption is expected to be experienced during the construction of the junction and relief road, however the true extent of disruption is likely to be diminished by existing noise on the motorway. More details on mitigating these impacts will be provided as part of the planning application.

Contribute to reducing water consumption

No negative consequences. No direct outcomes.

Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level)

No negative consequences. No direct outcomes.

Other (please state below)

11. Economic analysis

- a) Description of any actual or potential negative consequences and consider how to mitigate against these.
- b) Description of any actual or potential neutral or positive outcomes and consider how to improve as far as possible.

Impact on knowledge and skills

Proposed improvements have the potential to improve access to key local and regional transport routes (including public transport and active travel) for residents by helping to reduce constraints associated with congestion. Access to local academic institutions, early careers, and training courses including Cullompton Community College will also be improved through the reduction in through traffic and enhancements to the transport network.

Impact on employment levels

Proposed improvements have the potential to improve access to key local and regional transport routes (including public transport and active travel) in Cullompton, providing access to new and existing employment areas.

Local residential and commercial development unlocked by the proposals will help grow the number of potential pool of employees and places of employment within the local area.

Impact on local business

Construction of the proposals will allow for improved access to key sites of economic activity including the Hitchcocks Business Park and Mercury Business Park. Moreover, a reduction in through traffic on Cullompton's High Street facilitated by the proposed relief road will help create a more pleasant environment for shoppers, encouraging people to visit their local businesses in that area.