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Dear East Devon Council,

Re. East Devon Local – Issues and Options

Network Rail welcomes the opportunity to comment on this important consultation and would like to be kept informed on any future updated on the Local Plan.

Level Crossings

As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable.

We believe that any future developments take into consideration the impact on use of these crossings and any resulting increase in risk. This clearly will require early consultation between the planning authority, developers and NR to identify ways that any increase in risk can be mitigated.

Network Rail's level crossings teams' welcome further discussions.

Below is Network Rail's comments on the Local Plan - are below in bold.

Chapter 2 Objectives, Scope and Background

Objective 9 is promoting sustainable transport. This includes the active modes, public transport and electric cars.

On Page 4 there is a helpful map showing the East Devon District Council boundaries. **From a railway point of view it includes the following lines:**

- **The West of England line from Cranbrook to Axminster**
- **The Exmouth branch**

Chapter 4 Tackling the Climate Emergency

This notes that transport is the biggest emitter of carbon in the East Devon area (4.1). **Although enabling walking and cycling is mentioned there is no mention of rail or bus services (4.8).**

Chapter 5 Meeting Housing Needs

This sets out that 928 homes per year will need to be constructed in East Devon.

Chapter 6 Supporting Jobs and the Economy

Section 6.4 notes the recent focus on new employment sites on the eastern edge of Exeter including in and around the airport and at Cranbrook, the latter in particular being served by the West of England line. It is also noted that sites allocated for employment at Axminster, Honiton and Exmouth have not progressed as well as hoped for, and they are all on a Devon County Council Covid vulnerability index (6.6).

Chapter 7 Promoting Vibrant Town Centres

These include Cranbrook, Axminster, Honiton and Exmouth but also others that are not currently rail served.

Chapter 11 Promoting Sustainable Transport

Section 11.4 notes the bus services to the major towns in East Devon and a total of nine railway stations. Section 11.5 mentions the threat to public transport if low usage continues after the end of the Covid lockdowns. **This is perhaps understated given anecdotal evidence of a spike in used car sales following government advice not to use public transport because of safety concerns. In addition, the impact of Covid on the public finances is likely to make it difficult to meet additional revenue funding requirements for either bus or rail services, with a risk of reduced service frequencies leading to a spiral of decline of public transport.**

The list of potential policy objectives in 11.7 to encourage sustainable transport modes is all well and good, but it does not address the need for bus priority measures, the need for car parking charges to be set at levels that do not undermine bus or rail services, nor the potential for improved integration of sustainable modes. Electric cars are all well and good in terms of reduced emissions but they do not reduce congestion.

Chapter 12 Infrastructure and facilities

Section 12.4 notes the relatively large number of railway stations in the district and the pre-Covid increases in rail usage. **Cranbrook/Whimble loop is mentioned in 12.5 very briefly, but not any other additional infrastructure, for example, in the Honiton or Axminster areas. Although many of the infrastructure options will require capital funding to construct them, there is no mention of the need for revenue funding to allow public transport and other services to be provided on an ongoing basis.**

Chapter 13 Developing a strategy for the distribution of development

Section 13.2 describes the fact that most of the development in the district has been and is likely to continue to take place close to Exeter itself. In terms of housing 59% of new homes from 2013 to 2031 will be provided in what is termed the 'West End' with the remainder elsewhere in East Devon. This is logical given both the pull of Exeter as a regional centre for employment, leisure and education, but also an opportunity for sustainable transport modes including rail. **Outside the 'West End' it is planned to provide new housing in substantial numbers at Axminster and Exmouth, both of which are served by rail. This may help to justify the investment in the West of England line and associated projects in Exeter itself, such as re-modelling of track to increase capacity. There is a discussion about the location of future development with options to remain as now with the 'West End' in the top tier followed by the towns and then finally smaller developments in villages, to increase the proportion closer to Exeter or to allow more dispersed development. The latter is less likely to be able to be served by rail (or bus) whereas the other options may have benefits for the West of England and Exmouth lines (13.14).**

We hope these comments highlight some of the aspects that Network Rail feel are important. Thank you again for the opportunity to comment on the Local Plan.

Yours sincerely,

Laura Mellon MRTPI
Town Planner