

Filtered Data Export

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

Other party name (if relevant): Exeter and Devon Airport Ltd (EDAL)

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR05

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The draft policy includes provisions around navigational systems but not the wider safeguarding requirements of the Airport.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The opening text of the third paragraph of the draft Policy should be amended to read, “Development that that could have an adverse impact on the operation or safety or navigational systems at the Airport or any safeguarding requirements of the Airport...”

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Sustainable Transport and Communications chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Exeter Airport is a facility of sub-regional importance and this policy is central to its future operation.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

Other party name (if relevant): Exeter and Devon Airport Ltd (EDAL)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support growth and development at the West End and acknowledge the potential of the second

new community proposed here. The requirements in the draft Policy around masterplanning and phasing, and coordination with the provision of supporting infrastructure, will be particularly important and must be rigorously enforced.

However, it should also be acknowledged that this would be a substantial new community in close proximity to an Airport where noise and safeguarding issues can be a constraint. To support the delivery of the allocation without encountering difficulties later in the process that could otherwise have been avoided the Policy should make specific reference to the Airport and the need for early engagement and consultation in the preparation of the required masterplan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reference should be made in the Policy to the proximity of the Airport, and the need for the masterplan to proceed at every stage informed by consultation with the Airport.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Exeter Airport is a facility of sub-regional importance and this policy is central to its future operation.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

Other party name (if relevant): Exeter and Devon Airport Ltd (EDAL)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS05

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support the inclusion of a policy which supports the growth and expansion of the airport and

airport related businesses and operations. However, it is considered that some amendments to the draft policy are needed to ensure that it supports an appropriate strategy for the Airport and will be deliverable over the Plan period.

It is not clear why the draft policy should be restrictive in terms of the types of development supported within the operational boundaries, with a different approach to the north and south of the runway. Appropriate development should, flexibly, be allowed anywhere within this area to support the growth and expansion of the airport and reinforce its role as key infrastructure within the sub region.

Restrictions on noise sensitive development and in relation to safeguarding are appropriate. However, as currently drafted it is considered that there is some potential for confusion and misinterpretation. The text as currently drafted implies that the safeguarding provisions apply to the 57db noise contour when in fact they are independent of that and operate universally.

The text that suggests the policy does not apply to the Cranbrook Plan Area is inappropriate. Noise and safeguarding provisions should apply wherever they are relevant. Any new developments which prejudice or adversely impact on the core operational role and functions of the Airport should be prevented, wherever they would be located.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Parts A and B of the draft policy should be replaced with text to read, “Land will be allowed to support aviation related development, including employment, training / education, research and development, maintenance / repair / overhaul, freight / cargo, and other activities associated with the function of the Airport handling the movements of passengers and freight. This can include occupiers who rely on proximity to an Airport or who benefit from a transferrable skill base as well as to support the developing logistics cluster.”

The paragraph dealing with noise and safety should be replaced with text to read, “Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport

operations are not adversely impacted). Development proposals must not have a material impact on the operation of navigational and safety systems or any safeguarding requirements of the airport.”

The final sentence of the draft policy excluding its effect on the Cranbrook Plan area should be deleted.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Exeter Airport is a facility of sub-regional importance and this policy is central to its future operation.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

Other party name (if relevant): Exeter and Devon Airport Ltd (EDAL)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support measures which will encourage employment development in appropriate locations well

related to the Airport, particularly where this will relate to the aviation sector and the role of the Airport more generally. However, EDAL have very considerable concerns that the significant expansion in employment space proposed in this location to the east of the terminal cannot be accommodated without significant highways harm and an unacceptable impact on access to the Airport.

Land immediately east of the Airport's long stay Car Park 4 is already the subject of a Local Development Order (LDO). This land is referred to in the Regulation 19 document (paragraph 4.25) and the effect of the LDO is to grant planning permission here for an extended period within a specified set of parameters and subject to limited conditions.

The granting of the LDO was a missed opportunity to resolve highways and accessibility issues locally. EDAL engaged extensively in the consultation process around the LDO and highlighted that even with the addition of a series of limits and controls to the development it allowed it would still have a material negative impact on the operation of the highways network locally. The Council essentially accepted this. They acknowledged that with the LDO scheme the key junction (Long Lane / B3184) would operate above capacity and with queues at peak times extending back beyond the entrance to the Airport. Weaknesses were also identified in terms of pedestrian, cycle and public transport access. The LDO was nonetheless passed due to the benefits its implementation would deliver.

This position, whilst unacceptable and damaging to the Airport, is nonetheless embodied in the LDO. The implementation of development allowed by the LDO will already create real difficulty at this junction to the detriment of the Airport and without mitigation to address this harm.

Similar observations were made on behalf of EDAL in relation to other development proposals to the east of the terminal, further along Long Lane at McBain's Antiques (ref. 22/2578/MOUT), and south of Long Lane at Fair Oak Close (24/1049/FUL). Commercial development was ultimately approved in both cases with the officers' delegated reports referring to EDAL's comments about difficulty with the Long Lane / B3184 junction and accessibility generally, but not addressing them.

Additional traffic associated with a further potential allocation of 24.34ha of employment land east and south east of the LDO site either side of Long Lane would be

very substantial, and far greater than that already associated with the LDO development plus smaller permitted schemes referred to above. This would add very considerably to the impact at the Long Lane / B3184 junction; the vast majority of trips associated with such an allocation would pass across it. The pre-existing inadequacy of the junction will already be made worse (without any mitigation offered) by the LDO scheme. The impact of the McBain's Antiques development will be layered on to this (again with no mitigation offered), and the impact of the Fair Oak Close scheme added to that.

Any development which increases traffic at the Long Lane / B3184 junction should be required to provide measures for its improvement so that the harmful impact on the Airport and its access can be reduced. Absent such measures further development should not be allowed. At some point the Council must grapple with the fact that this junction already operates above capacity, this has a negative impact on the running of the Airport, the Airport is infrastructure of some considerable sub-regional importance, and simply adding to this harm without remedying the situation is untenable and should not be allowed. New development relying on access to Long Lane east of the entrance to the Airport should not be allowed until this is resolved.

It is acknowledged that the draft Policy looks for mitigation to avoid additional traffic negatively impacting on the operation of the local highway network in particular the Long Lane B3184 Intersection. However, two observations should be made in this regard.

First, the operation of this junction is already unacceptable. Any allocation affecting it must be required to make its operation better, not just avoid negative effects as suggested by the draft Policy.

Second, and more fundamentally, it is already the case that the 7.7ha LDO site will have a detrimental impact on this junction, made worse by other smaller scale permissions locally. The further impact of traffic associated with an additional 24.34ha would dwarf this, and make an already unacceptable situation substantially worse. Long Lane is narrow, unsuited to major employment development, and the potential for further enhancements to it in the stretch west of the Hilton hotel is very limited. The land available for a meaningful upgrade at the junction of the B3184 and Long Lane is limited.

This constraint is so significant that the allocation should not be allowed to proceed unless convincing evidence is produced to show that mitigation is deliverable that would support the associated traffic adequately on the network and improve the operation of the junction of the B3184 and Long Lane. EDAL have reviewed the evidence base published alongside the Regulation 19 document and could not see that such an exercise has been completed.

The Site Selection Report (SAL-016) refers to recent and planned improvements to highways locally, but also to wider junction capacity constraints. An initial site assessment has been completed from a transport perspective (TRI-023) but this only addresses residential sites. Unless evidence is provided showing how a successful outcome can be delivered here the proposed allocation must not proceed.

Finally, if it is possible to overcome this constraint and the allocation is retained, criterion D should be amended. There is no good reason why indoor sports or recreational activity should be allowed here. Some food and beverage activity might be appropriate to serve the local workforce but leisure use cannot sensibly be offered as somehow supporting the employment use, and would also contribute to the traffic difficulties here.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Unless convincing evidence is made available to demonstrate the allocation can be made acceptable from a highways and access perspective the allocation should be deleted. Reference to sports and recreational uses should be removed.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Exeter Airport is a facility of sub-regional importance and this policy is central to its future operation.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

Other party name (if relevant): Exeter and Devon Airport Ltd (EDAL)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS08

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support measures which will encourage employment development in appropriate locations well

related to the Airport. However, for reasons expressed elsewhere in their representations EDAL are extremely concerned about the traffic impacts of large scale employment allocations close to the Airport.

This proposed allocation is less problematic given its location and limited size. Nonetheless, it is likely that traffic associated with development here would cross the western end of Long Lane at its junction with the B3184. As explained elsewhere in these representations the operation of that junctions is already unacceptable, and made worse by planning decisions taken by the Council.

To avoid any further worsening of the performance of this junction a criterion should be added to this policy to include mitigation if needed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A criterion should be added to the Policy requiring mitigation if needed to avoid additional traffic negatively impacting on the operation of the local highway network, in particular the Long Lane / B3184 Intersection.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-