

Filtered Data Export

**Full name:** Craig Hatton

**Organisation (where relevant):** Network Rail

**Other party name (if relevant):** Network Rail

**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.:** TR02

**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.:** To ensure the full suite of rail improvements and opportunities are covered, the following is required to make the draft Policy sound. This would ensure the Policy is effective and compliant with national policy. The following wording should be added within the public transport section of the draft Policy: ? Upgrades and related changes to stations, including but not limited to, additional and/or lengthened platforms, bridges and lifts. OFFICIAL ? Improvements and mitigation to level crossings Axminster to Cranbrook inclusive

**Full name:** Grace Lewis

**Organisation (where relevant):** Network Rail

**Proposal:** 11. Sustainable Transport and Communications

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 11.1

**1(b). Does your comment relate to one of the changes listed above?:** No

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

**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.:** As a general comment, the key role of the railway, combined with bus integration, does not come across strongly in the 2nd regulation document, nor the priority around delivering infrastructure and service enhancements on the West of England and Exmouth lines. It would be good to see these points given greater prominence.

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**Organisation (where relevant):** Network Rail

**Proposal:** 11. Sustainable Transport and Communications

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**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR02

**1(b). Does your comment relate to one of the changes listed above?:** No

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

**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.:** Whilst there is a reference to the proposed passing loops between Honiton and Cranbrook, there is no reference anywhere to Exmouth branch redoubling to Digby, nor to the proposed train service increases on the WoE and Exmouth lines. These would provide significant public transport improvements for the area and could play an important role in providing sustainable transport options for Marlcombe, so we would expect to see reference to these.

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**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 11.1

**1(b). Does your comment relate to one of the changes listed above?:** Yes

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

**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.:** As a general comment, the key role of the railway, combined with bus integration, does not come across strongly in the 2nd regulation document, nor the priority around delivering infrastructure and service enhancements on the West of England and Exmouth lines. It would be good to see these points given greater prominence.

**Full name:** Grace Lewis

**Organisation (where relevant):** Network Rail

**Proposal:** 17. Implementation and Monitoring

**1. To which part of the Implementation and Monitoring chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 17.2

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Implementation and Monitoring chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Implementation and Monitoring chapter, please use this box to set out your comments.:** We support the idea of a governance body to oversee implementation of the Marcombe Transport Vision and monitoring framework, especially the reference to tracking mode share and resident surveys. Hopefully some of this data, particularly in relation to rail usage/perceptions around the rail services could be shared with us to provide strategic planning insights.

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**Other party name (if relevant):** Network Rail

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**1(b). Does your comment relate to one of the changes listed in the table above?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** Strategic Policy SP07: Delivery of infrastructure In relation to the second station at Cranbrook, which has been ruled out. Funding set aside for the second station should be reallocated either to the Devon Metro scheme as a whole or specifically to improvements to Cranbrook station. It remains essential that CIL / S106 contributions to the Devon Metro are secured. NR supports that this remains a Priority 1 scheme in the latest Infrastructure Delivery Plan (IDP) published as part of the consultation. NR continues to emphasise the importance of funding contributions towards securing larger funding packages. It is noted that there will be a separate IDP for Marlcombe.

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**Other party name (if relevant):** Network Rail

**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS10

**1(b). Does your comment relate to one of the changes listed above?:** No

**1(c). If the comment is related to a site, please state the site reference here.:** Land North of Topsham

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** NR requires additional wording to the draft Policy to ensure that the full scope of rail connections are considered in the context of delivering the site. This would make the draft Policy sound and are considered necessary to make it effective and consistent with national policy. The following wording should be included with Part B of the Development and Infrastructure Delivery Framework: B: A comprehensive transport strategy to prioritise active travel and public transport, to include consideration of rail enhancements at Digby and Sowton to provide the required capacity to Exeter.

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

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

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**  
Marlcombe

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:** NR requires stronger policy wording to reflect the need for further funded rail enhancements to support the delivery of Marlcombe. The following wording is suggested to be included to make the draft Policy sound. This would be in addition to the proposed wording at 4b to 4f. This is considered necessary to make the draft Policy effective and to be consistent with national policy:

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** This would be in addition to the proposed wording at 4b to 4f. This is considered necessary to make the draft Policy effective and to be consistent with national policy: Rail service enhancements, integrated with local bus and active travel enhancements through the Devon Metro strategy, are expected to play a key part in delivering growth across the majority of East Devon, including Marlcombe, focusing on the Exeter – Waterloo and Exeter – Exmouth lines. Rail service frequencies achieved through infrastructure enhancements will enable a higher proportion of trips from Axminster, Honiton, Whimple / Feniton, Cranbrook and Pinhoe to be made by public transport rather than private car, both into Exeter itself and beyond (e.g. London and Plymouth). The Waterloo line enhancements to two trains per hour between Axminster and Exeter will help reduce traffic on the A30 corridor towards the M5 and Exeter, releasing capacity for the

new town of Marcombe and other development to the east of the city such as Honiton and Axminster, as well as enabling the completion of Cranbrook. Importantly the rail enhancements provide the required capacity improvements, particularly in peak periods such as travel to Exeter College, as well as enhanced frequencies. Marcombe offers a significant opportunity to create north – south bus and active travel links between Cranbrook and Digby and Sowton stations via the West End employment areas such as Skypark, the airport, Marcombe itself and the development land north of Topsham, creating a local integrated network of key destinations that will improve connectivity for both existing communities and new developments. The Exmouth line enhancements between Digby and Sowton and Exeter would create the second focal point in the integrated network with the opportunity to double frequencies to four trains per hour, creating an attractive turn up and go link from Marcombe and the WS10 site into Exeter and down to Exmouth. This also releases capacity for the planned further growth at Exmouth. As part of 'Wider Infrastructure' paragraph H, NR questions the role and purpose of the proposed park and ride site on the A30. This is duplicating, and potentially diluting, the role of the Devon Metro upgrades projecting a confused strategy which therefore risks future funding streams. Given the performance of the current park and ride sites at Sowton and Honiton Road sites it is questionable whether it would be viable with changed travel patterns. It is suggested that focus be given towards funding the Devon Metro as this would more actively promote sustainable travel. There is scope for 'Park and Rail' instead of 'Park and Bus' at suitable stations, taking account of future parking capacity at key stations such as Axminster. Digby and Sowton has potential for this role too given the location adjacent to Sowton. The southern park and ride serving the A3052 corridor has a stronger case given there is no realistic parallel rail corridor, though again its role relative to Digby and Sowton needs to be clearly defined.

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**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Paragraph

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

4.8b

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

- Under the justification for Strategic policy WS01, Paragraph 4.8b refers to new bus services linking Marlcombe and Exeter. We appreciate this is aspirational but has any preliminary work been done to assess the potential cost and practical feasibility of introducing the proposed bus priority measures where needed, based on the condition of Exeter's road network? Our understanding is that it would be challenging to deliver bus priority measures all the way into Exeter.

- In turn, what level of confidence is there that a reliable bus service can be established that would meet future demand if Marlcombe is fully developed to accommodate circa 18,000 residents (i.e. would the proposed bus priority measures be comprehensive enough to prevent routes from being significantly affected by congestion)?

- Under the justification for Strategic policy WS01, paragraph 4.8b also refers to “Mobility hubs across Marlcombe”. Would the LPA also consider developing them specifically at Cranbrook and Digby & Sowton stations to improve first and last mile integration? The role of these locations as multi-modal interchange hubs could be emphasised, as well as the particular facilities that would be desirable to support that role.

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**Organisation (where relevant):** Network Rail

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Paragraph

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

4.8b

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

- Under the justification for Strategic policy WS01, Paragraph 4.8b refers to new bus services linking Marlcombe and Exeter. We appreciate this is aspirational but has any preliminary work been done to assess the potential cost and practical feasibility of introducing the proposed bus priority measures where needed, based on the condition of Exeter's road network? Our understanding is that it would be challenging to deliver bus priority measures all the way into Exeter.
- In turn, what level of confidence is there that a reliable bus service can be established that would meet future demand if Marlcombe is fully developed to accommodate circa 18,000 residents (i.e. would the proposed bus priority measures be comprehensive enough to prevent routes from being significantly affected by congestion)?
- Under the justification for Strategic policy WS01, paragraph 4.8b also refers to "Mobility hubs across Marlcombe". Would the LPA also consider developing them specifically at Cranbrook and Digby & Sowton stations to improve first and last mile integration? The role of these locations as multi-modal interchange hubs could be emphasised, as well as the particular facilities that would be desirable to support that role.

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**

Honi\_18, GH/ED/39a, GH/ED/39b

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** NR consider the following changes are required to make the draft Policy sound in respect of Honi\_18 and 39a/b. The allocation of these sites is welcome as they will stimulate rail demand as part of the Devon Metro vision. For this to take place however we would like to see a clearer requirement for good quality active travel routes linking the sites to the rail station. The current assumption for 39 a and b seems to be to use Northcote Hill / Monkton Road for active travel routes towards the station. Monkton Road is especially busy, as is the junction with High Street / Kings Road. It is challenging to see how this could be made an attractive and safe walking and cycling route. Consideration should be given to requiring the provision of a high-quality walking and cycling route between sites 39a/b and Honi\_18. The route could potentially follow the railway and the tree line / stream up to Honi\_18. As noted in the policy for Honi\_18 there would need to be an effective crossing of Kings Road giving access to Pine Park Road and the connecting pedestrian path to the station. A further pedestrian crossing should be considered on New Street near the railway bridge. This link would have the benefit of providing an improved route to the town centre and college.

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**1(b). Does your comment relate to one of the changes listed above?:** No

**1(c). If the comment is related to a site, please state the site reference here::**

Axmi\_02, Axmi\_08, Axmi\_09

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

NR supports the inclusion of securing public transport improvements within paragraph 1 of the draft Policy.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:**

Parking is however becoming an increasing challenge at the railway station despite active travel measures and will potentially need to be expanded within the lifetime of the plan, especially if there is significant development in adjacent areas such as Chard. We would welcome a constructive dialogue with EDDC and adjacent landowners to explore options to achieve this and to make appropriate amendments to policies in the Local Plan if considered necessary to support this.