

LDO Power Park; Statement of Reasons Appendix A - Consultation responses

Consultee	Summary of comments	Response
Environmental Protection - Pollution	<p>The acoustic planning report detailed within appendix J specifics that the external noise levels from any fixed plant on the development will be limited to the following:</p> <p>The cumulative contribution of noise from all fixed items of building services plant associated with the Proposed Development is controlled to be at least 5 dB lower than the background noise throughout the day and night.</p> <p>This is considered to be an appropriate noise mitigation scheme for the development.</p>	None
Environmental Protection - Contamination	<p>I recommend that the following details are added to Appendix B of the LDO</p> <p>Due to the exceedances of Total Petroleum Hydrocarbons (TPH) within the development area, barrier piping should be used for any drinking water supply pipework.</p> <p>Reason: To ensure a safe drinking water supply from any existing soil contamination.</p>	The Design Code has been amended to require the installation of barrier pipe for drinking water supply pipework
Archaeology	<p>Further to our conversation regarding this LDO earlier in the month, please find below the Historic Environment Team's comments on the proposed LDO archaeological condition:</p> <p>The archaeological condition - Condition 9 - is fine but could it be amended slightly as below:</p> <p><i>No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority. The development shall be carried out at all times in strict accordance with the approved scheme of investigation, or such other details as may be subsequently agreed in writing by the Local Planning Authority.</i></p> <p><i>Reason – To ensure that any heritage assets with archaeological interest features of archaeological or architectural importance are investigated and recorded before their destruction or concealment and to ensure that an appropriate record is made of archaeological evidence that may be affected by the development.</i></p> <p>We have recently sent our revised archaeological condition wordings for consultation to your Authority, these include a new condition to ensure that the post-fieldwork specialist assessment and analysis, reporting and archive tasks are undertaken in a timely manner. As such, in addition to the above condition would it be possible to have the following worded condition applied to the LDO:</p> <p><i>The development, or individual phase of this development, shall not be brought into its intended use until the post investigation assessment for the development, as whole or individual phase, has been completed in accordance with the approved Written Scheme of Investigation. The provision made for analysis, publication and dissemination of results, and archive deposition, should be confirmed in writing to, and approved by, the Local Planning Authority.</i></p>	The archaeology condition has been amended to reflect the consultee comments and ensure adequate recording of any heritage assets with archaeological interest.

	<p><i>Reason</i> <i>'To comply with Paragraph 205 of the NPPF, which requires the developer to record and advance understanding of the significance of heritage assets, and to ensure information gathered becomes publicly accessible.</i></p>	
<p>EDDC Ecologist</p>	<p>I have one comment, which could be addressed now or possibly at the next stage (during creation of detailed ecological mitigation strategies/CEMP as detailed in the EcIA report):</p> <p>The ~90 m of site entrance hedgerow/bank to be removed is not shown as translocated, as per my previous comments. Translocating this feature would retain its ecological value, enables easier and quicker re-establishment compared to re-planting elsewhere (benefitting dormice, reptiles and nesting birds) and can be enhanced by supplementary whip planting. This saves emissions and sequesters carbon, and provides visual and benefits, and is in line with the mitigation hierarchy. This should be considered but is not shown on the layout plan. Should this be reconsidered now, or added as an informative to the permission, expected to be addressed at a more detailed design stage?</p>	<p>The bank along the southern boundary to the site has already been removed as part of the Long Lane road widening scheme so unfortunately it is no longer possible to translocate it.</p>
<p>Exeter Airport</p>	<p>The draft LDO, Design Code and associated documents have been examined from an Aerodrome Safeguarding aspect and the following points should be addressed to ensure compliance with aerodrome safeguarding criteria and ensure there are no impacts on aircraft safety and the operations at Exeter Airport.</p> <p>1. LDO Section 5) Development parameters (Table 1) line 2, states "All development shall be lower than Exeter Airport's Obstacle Limitation Surface line and no higher than 52.0m AOD." This should also make reference to and include Instrument Flight procedures (IFP) with the following being suitable. All development shall be lower than Exeter Airport's Obstacle Limitation Surface line and Instrument Flight Procedure and no higher than 52.0m AOD.</p> <p>The results of the recently carried out IFP assessment showed there is the potential for some IFP in this area to be lower than the Obstacle Limitation surface and rewording is required to ensure there is no confusion.</p> <p>2. LDO Appendix B Condition 10) Aerodrome Safeguarding. This condition is critical to ensure aircraft safety is maintained and with this in mind it is essential that all assessments are formally reviewed and approved by Exeter Airport to ensure suitability and compliance with Civil Aviation Authority safeguarding regulations. The wording has deviated from the suggested and makes no reference to who is approving the assessments. The previously supplied suggestion would be suitable.</p> <p>No phase of development shall commence until an Aerodrome Safeguarding Assessment for that phase has been submitted to and approved in writing by the Local Planning Authority in consultation with the operators of Exeter Airport. The Aerodrome Safeguarding Assessment must demonstrate that the phase can be developed in an acceptable manner having regard to all of the following:</p> <p>a. Obstacle Limitation Surfaces (OLS Assessment, Cranage Assessment) b. Navigation Aids and Communications Equipment (Technical Assessment)</p>	<p>The LDO has been updated under section 5, parameter 2 to include a restriction to the maximum height to also be under the airports Instrument Flight Procedure (IPF) to account for areas where the IPF is lower than the Obstacle Limitation Surface line.</p> <p>Condition 10 of the LDO has been amended to ensure the LPA has to approve the submitted documents. Correspondence with the Airport has confirmed they are satisfied with the amended condition.</p>

	<p>c. Air Traffic Control (Line of Sight Assessment) d. Instrument Flight Planning (IFP Assessment) e. Reflective Surfaces (Glint and Glare Assessment) f. Lighting Interference (Lighting Assessment) g. Bird Strike and Wildlife Hazard (Wildlife Hazard Management Plan)</p> <p>The development shall be carried out in strict accordance with the requirements of the approved Aerodrome Safeguarding Assessment for each phase.</p> <p>Reason – To ensure the development meets the safeguarding requirements of the aerodrome.</p> <p>The following was also suggested as a useful informative but has not been included, Developers should note that statute covering the responsibility of Airports for safeguarding is set out in the Air Navigation Order 2016, as amended, and the Regulations are set out in the Civil Aviation Publication number 738, issued by the Civil Aviation Authority. Exeter & Devon Airport Ltd is designated the Safeguarding Authority through its airport operating licence and must be consulted in the application of the Regulations and other safeguarding activity. Regard should also be had to the Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002</p> <p>If these points raised are addressed and included in the final LDO then from an aerodrome safeguarding perspective, providing there is strict adherence to the LDO, there would be no safeguarding objection.</p> <p>There are a number of additional planning matters that have been set out in a separate response on behalf of Exeter Airport which should be read in conjunction with this response to ensure all safeguarding and planning concerns are addressed.</p>	<p>An informative paragraph added to Section 9 of the LDO (Other Statutory requirements) noting the statute covering the responsibility of Airports for safeguarding.</p>
<p>Local Highways Authority</p>	<p>30/05/2022</p> <p>The Local Development Order (LDO) application site is situated off the public highway named Long Lane, which also serves Exeter Airport immediately to the west and several units that form part of Exeter Airport Business Park on its southern side. Through the adopted East Devon Local Plan (EDLP), the site in question has been allocated as a future strategic area for business and employment uses to help accommodate the expansion of Exeter Airport Business Park. Policy obligations within the EDLP and requirements set out in the East Devon Infrastructure Development Plan (IDP) highlight the necessity for highway improvements to enhance general access along Long Lane (priority one) and to deliver a bus service to/from the area to surrounding developments (priority two), such as (but not necessarily limited to) Cranbrook, Skypark and the Science Park, with the latter estimated to cost within the region of £1M.</p> <p>In line with the required highway obligations outlined in the EDLP, works are currently being undertaken to widen Long Lane to a consistent width of 6.5m from the application site heading west to an extent terminating along the frontage of Exeter Airport car park 1 (as denoted in the supporting information). Pedestrian</p>	

improvements are also being carried out along a similar extent that will see a continuous footway along the northern side of Long Lane. The works are expected to finish later in 2022.

A Transport Assessment (TA) has been submitted in support of the LDO. It is advised the LPA consult National Highways to ascertain their view on the potential impact from the development proposed on the wider strategic network. The submitted TA includes modelling up to 2034 with and without the proposal site, on various points on the local highway network (based on the above mitigation currently being delivered) as agreed in advance with the Local Highway Authority (LHA). It is noted that, in the future the Long Lane/B3184/Airport car park junction situated southwest of the proposal

site would operate over capacity in the PM peak that would see additional queue lengths, in particular regard to the Long Lane approach to the junction in question. Whilst the applicant offers a suggestion to a short-term measure to help mitigate queuing at this location (figure 5.5.11 in the TA), there appears no clear commitment to provide or contribute towards other outstanding alternative mitigation methods in support of the scheme including priority two within the IDP.

Turning to the access proposed and internal layout, the plans appear indicative at the stage and are therefore subject to change. The access would need to be designed and built to an appropriate standard to accommodate two-way vehicle flow for all associated vehicles whilst affording suitable visibility splays in line with a recognised design standard and ensuring that no surface water will be distributed onto the public highway. Should the proposed relocation of the existing posted speed limits be unsuccessful through a TRO application, any visibility splays proposed will need to be justified and evidence based. If it is the intention to offer the site up for adoption to the LHA, the commercial estate road and the access thereto will need to meet adoptable standards. Going forward, it is advised the applicant consults our commercial design guide document and enter dialogue with ourselves prior to any formal submission of such detail coming forward. The applicant has submitted a supporting Framework Travel Plan. Once it has been established that the supporting document is considered to be to an acceptable standard, commitment to delivering associated obligations within the document will also need to be appropriately secured.

Conclusion

With the above in mind, whilst in principle there is no objection from the LHA, it is viewed necessary, as a form of mitigation, that appropriate contributions from the applicant are committed to, in helping the delivery for improving and enhancing accessibility to the site from surrounding developments via bus and secured through a S106 agreement. Implementing this will greatly promote the opportunity for local sustainable travel and help offset vehicular movements on the local highway network that would derive from this development coming forward. This will also compliment and adhere to the strategic obligations for the West End development area, as detailed within Strategy 9 of the EDLP. Whilst the development proposed would see future additional queuing traffic at the nearby junction, contributing to the delivery of the IDP and EDLP requirements would help mitigate this issue. Longer term however the LPA needs to be mindful, the effected junction is likely to require strategic alterations and improvements in the future. As above, full details of vehicular access into the site will need to be agreed in writing and in conjunction with the LHA and delivered in full prior to the development first being brought into use. A detailed CEMP will be required and annexed into any favourable decision notice, details of which will need to be agreed in advance of works starting.

Recommendation:

The LHA recommend that contributions towards bus services (as detailed in the EDLP and IDP or as otherwise agreed with the LHA) to improve future connectivity in the area are firstly committed to, with fee and trigger points (where

The Long Lane road improvements are expected to be completed in March 2023. The roadworks have been undertaken to widen the road to enable two HGV vehicles to pass and ensuring this section of Long Lane is suitable for the type of traffic proposed under the LDO. The Enterprise Zone programme has provided £4.5m of funding for the highway works and secured a suitable contribution of £300,000 from the landowner.

necessary) agreed in writing, in advance of any suitable legal agreement being drafted. Further detail of the proposed vehicular access could also be provided, however should this not, a Grampian condition can be annexed into any favourable decision notice to ensure its timely delivery.

27/06/2022

Further to recent discussions and dialogue regarding previous contributions, the LHA provide the following additional comments regarding the above LDO.

The LPA should note that public transport to/from the development site is likely to be via the 56 service. However, such service has been recently reviewed that may see revised services later this calendar year. As such, any persons intention to utilise public transport on this service could be influenced by this outcome which may see a rise in car dependency. Any scope to improve future connectivity via public transport that would benefit associated parties to the site (and as such the local employment area) would be welcomed and advised wherever possible. It is presumed that a Travel Plan will be appropriately secured to help promote and provide incentives for sustainable methods of travel to the employment site.

Any access new or altered will require the applicant entering into a S278 Legal Agreement with the Local highway Authority under the 1980 Highways Act, with the full design detail including drainage and visibility splays to be agreed in writing with the LHA. The access detail currently is indicative, therefore it is advised the applicant approach the LHA to discuss this at a later date with detail regarding how the scheme will tie into the public highway network.

Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, MAY WISH TO RECOMMEND CONDITIONS ON ANY GRANT OF PLANNING PERMISSION

Therefore, we recommend the following conditions are attached:

- No development shall take place until details of the layout and construction of the access, including appropriate visibility splays have been submitted to and approved in writing by the County Planning Authority. The approved details shall be implemented in full before the development is brought into use. REASON: To ensure the layout and construction of the access is safe in accordance with policy TC7 in the East Devon Local Plan 2013-2031.
- Prior to commencement of any part of the site the Planning Authority shall have received and approved a Construction Management Plan (CMP) including:
 - (a) the timetable of the works;
 - (b) daily hours of construction;
 - (c) any road closure;
 - (d) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inc.; 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;
 - (e) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
 - (f) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;

The Enterprise Zone programme has provided funding towards the No.56 bus service to support sustainable travel in the area.

The Design Code sets out the requirements for a Travel Plan.

The Design Code stipulates S278 agreement being required for any access onto the highway, which will ensure any access onto the highway is safe. Full compliance with the Design Code is controlled through Condition 2 of the LDO. It is therefore considered that the recommended condition is not necessary.

The LDO contains a condition for a Construction and Environment Management Plan (CEMP) to ensure the relevant details as requested by the Local and National highways Authorities are submitted and approved.

	<p>(g) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;</p> <p>(h) hours during which no construction traffic will be present at the site;</p> <p>(i) the means of enclosure of the site during construction works; and</p> <p>(j) details of proposals to promote car sharing amongst construction staff in order to limit construction staff vehicles parking off-site</p> <p>(k) details of wheel washing facilities and obligations</p> <p>(l) The proposed route of all construction traffic exceeding 7.5 tonnes.</p> <p>(m) Details of the amount and location of construction worker parking.</p> <p>(n) Photographic evidence of the condition of adjacent public highway prior to commencement of any work.</p> <ul style="list-style-type: none"> • No development shall take place until a surface water drainage scheme has been submitted to and approved in writing by the County Planning Authority. Unless it is demonstrated that it is unfeasible to do so, the scheme shall use appropriate Sustainable Urban Drainage Systems. The drainage scheme shall be designed so that there is no increase in the rate of surface water runoff from the site resulting from the development and so that storm water flows are attenuated. The development shall be carried out in accordance with the approved scheme. REASON: To protect water quality and minimise flood risk in accordance with policy EN22. • The Development hereby permitted shall not be commenced until properly consolidated and surfaced parking and turning spaces for all associated vehicles have been provided and constructed within the site in accordance with details which shall have been submitted to and approved in writing by the Local Planning Authority. Such parking and turning spaces shall be kept clear of obstruction at all times and shall not be used other than for the parking and turning of vehicles in connection with the development hereby permitted Reason: In the interest of Highway safety. <p>05/10/2022</p> <p>Many thanks for your email and attachments that makes us aware of National Highways revised stance on the LDO application. DCC have no further to comments to make in response.</p>	<p>The Drainage Strategy forms part of the LDO Design Code. It has been consulted on with Devon County Council as the Local Lead Flood Authority. The strategy uses appropriate Sustainable Urban Drainage Systems and is considered acceptable. A specific condition would duplicate the requirements already set out in the LDO and is therefore not required.</p> <p>Section O5 E of the Design Code sets out the requirements for the parking, turning and manoeuvring of vehicles. It requires all spaces to be properly consolidated and surfaced as well and for the parking and turning areas to be retained for such use. A specific condition would duplicate the requirements already set out in the LDO and is therefore not required.</p>
Landscape	<p>The submitted details are generally acceptable, having been amended in relation to pre-application landscape advice. However there are some minor details which still require amendment and additional minor comments as follows which require further consideration:</p> <p>Landscape Proposals dwg. no. 001 Rev C</p> <p>The detail for proposed tree pits is still showing excessive depth of excavation and inappropriate topsoil backfill which does not reflect current best practice or BS 8545, 2014 Trees from nursery to independence in the landscape. Tree pits should be excavated no deeper than required to accommodate the depth of the roots. The base of the pit should be forked over and backfill should comprise excavated soils replaced to match surrounding soil horizons.</p> <p>In a number of instances to the eastern side of the site proposed tree planting is shown directly over or very close to proposed filter drains/ existing piped drain that run north-south along the eastern site boundary. Confirmation should be provided that the proposed tree locations will not compromise the drainage infrastructure or trees should be repositioned away from them. The proposed crab apple trees (<i>Malus sylvestris</i>) positioned either side of the site access</p>	

seem an odd choice as they are small trees that, in themselves, are unlikely to have much impact and they should be changed to larger species such as hornbeam.

3 CONCLUSION & RECOMMENDATIONS

Subject to receipt of satisfactory amendments as noted above the proposed scheme could be considered acceptable in terms of landscape and visual impact and design subject to the following conditions:

1 No works shall commence on site until the following information has been submitted to the LPA and approved in writing:

a) Measures for protection of existing perimeter trees/ undisturbed ground during construction phase in accordance with BS5837: 2012. Approved protective measures shall be implemented prior to commencement of construction and maintained in sound condition for the duration of the works.

b) A soil resources plan prepared in accordance with Construction Code of Practice for the Sustainable use of Soils on Construction Sites – DEFRA September 2009, which should include:

- *a plan showing topsoil and subsoil types based on trial pitting and laboratory analysis, and the areas to be stripped and left in-situ.*
- *methods for stripping, stockpiling, re-spreading and ameliorating the soils.*
- location of soil stockpiles and content (e.g. Topsoil type A, subsoil type B).
- schedules of volumes for each material.
- *expected after-use for each soil whether topsoil to be used on site, used or sold off site, or subsoil to be retained for landscape areas, used as structural fill or for topsoil manufacture.*
- identification of person responsible for supervising soil management.

c) Notwithstanding the landscape details submitted, no landscape works shall begin until a site specific Landscape and Ecology Management and Maintenance Plan has been submitted to and approved in writing with the Local Planning Authority. This shall set out responsibilities for maintenance within the site and cover the management and ongoing maintenance of hard and soft landscape elements and bio-diversity measures including existing trees hedgerow and retained grassland.

The Plan shall set out the landscape and ecological aims and objectives for the site along with the specific management objectives for each landscape component, and the associated maintenance works required on an Annual and Occasional basis. The Annual Works are those works that will be required every year, such as watering, weeding and cleaning. The Occasional Works are those that will be required on an irregular or cyclical basis, such as repairs and renewals. Details of inspection, monitoring and reporting arrangements shall also be provided. The Plan shall cover a period of not less than 25 years following the substantial completion of the development and shall be reviewed every 5 years and updated to reflect changes in site conditions and management prescriptions in order to meet the stated aims and objectives. Management, maintenance inspection and monitoring shall be carried out in accordance with the approved plan.

2 The works shall be executed in accordance with the approved drawings and details and shall be completed prior to first use of the proposed buildings (or phase) with the exception of planting which shall be completed no later than the first planting season following first use.

It is considered that Landscaping is adequately controlled through the Design code, as explained below, and there is no further requirement for a landscaping condition;

1a) Section 05 H of the Design Code document has been amended to ensure protection of boundary hedgerows and trees.

1b) The site is to be designed for a balanced cut and fill with all soil being retained on site. In the event of cart away of soil, a soil resource plan will be required by as part of the Site Waste Management Plan.

1c) A Landscape Environmental Management Plan (LEMP) is required by Design Code to ensure long term landscape and ecological management of the site. Due to the nature of the LDO allowing for flexible development of the site and implementation being able to take place at any point it would be difficult to identify when substantial development has taken place. As such it is considered appropriate to ensure monitoring undertaken for 15 years following expiry of the LDO. After which annual regimes will be undertaken in perpetuity.

2) Section 05 H of the Design Code sets out the requirements for planting which will need to be complied with.

3) Section 05 H of the Design Code requires any trees or plants which die within the 15

	<p>3 Any new planting or grass areas which fail to make satisfactory growth or dies within five years following completion of the development shall be replaced with plants of similar size and species to the satisfaction of the LPA. (Reason - In the interests of amenity and to preserve and enhance the character and appearance of the area in accordance with Strategy 3 (Sustainable Development), Strategy 4 (Balanced Communities), Strategy 5 (Environment), Strategy 43 (Open Space Standards), Policy D1 (Design and Local Distinctiveness), Policy D2 (Landscape Requirements) and Policy D3 (Trees in relation to development) of the East Devon Local Plan. The landscaping scheme is required to be approved before development starts to ensure that it properly integrates into the development from an early stage.)</p>	<p>years of monitoring shall be replaced during the next planting/seeding season.</p>
<p>Local Lead Flood Authority</p>	<p>I have reviewing the information submitted online for 22/0914/LDO Local Development Order to permit up to 26,000sqm floor space for employment generating uses and ancillary, along with associated site infrastructure, earth works, access and landscaping Land Off Long Lane Clyst Honiton (eastdevon.gov.uk).</p> <p>The information below is key to the drainage strategy and is not included within the SuDS Assessment listed online which mentions the use of soakaways which is contrary to the latest drainage plans ie attenuation in a basin.</p> <p>We would need the most up-to-date information submitted for this application.</p>	<p>The initial SuDS assessment report has been superseded by the drainage strategy document. The implementation of the drainage strategy is controlled through the Design Code.</p> <p>The Local Lead Flood Authority has been re-consulted with the latest drainage documents, no further objection or request for additional information has been received.</p>
<p>South West Water</p>	<p>With reference to the planning application at the above address, the applicant/agent is advised to contact South West Water if they are unable to comply with our requirements as detailed below.</p> <p><u>Asset Protection</u> Please find enclosed a plan showing the approximate location of a public 125mm water main in the vicinity. Please note that no development will be permitted within 3 metres of the water main, and ground cover should not be substantially altered.</p> <p>Should the development encroach on the 3 metre easement, the water main will need to be diverted at the expense of the applicant. The applicant/agent is advised to contact the Developer Services Planning Team to discuss the matter further.</p> <p>If further assistance is required to establish the exact location of the water main, the applicant/agent should call our Services helpline on 0344 346 1010.</p> <p><u>Surface Water Services</u> The applicant should demonstrate to your LPA that its prospective surface run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable (with evidence that the Run-off Destination Hierarchy has been addressed, and reasoning as to why any preferred disposal route is not reasonably practicable):</p> <ol style="list-style-type: none"> 1. Discharge into the ground (infiltration); or where not reasonably practicable, 2. Discharge to a surface waterbody; or where not reasonably practicable, 3. Discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable, 	<p>Further investigation has been undertaken to establish the location of the water main. A 3m easement of the water main has been agreed.</p> <p>The submitted drainage strategy report demonstrates that the Run-off Destination Hierarchy has been addressed.</p>

	<p>4. Discharge to a combined sewer. (Subject to Sewerage Undertaker carrying out capacity evaluation)</p> <p>Having reviewed the applicant's current information as to proposed surface water disposal for its development, please note that method proposed to discharge attenuated flows into a surface water body is acceptable and meets with the Run-off Destination Hierarchy.</p>	
<p>National Highways</p>	<p>1st June 2022</p> <p>National Highways was consulted on the scope of Transport Assessment as part of pre-application discussions with East Devon District Council. A Transport Assessment (TA) has subsequently been prepared by Northern Transport Planning Limited (NTP). Whilst the LDO does not define a precise development mix, the TA has assumed the following indicative split is assumed:</p> <ul style="list-style-type: none"> • 10,400 sqm GFA B2 land use (40%) • 15,600 sqm GFA B8 land use (60%) <p>Noting the range of land uses that would be permitted under the LDO (which includes Use Class E(g) i) Office, and/or the potential for parcel distribution uses), the assumed land use mix does not necessarily represent the worst case in terms of potential peak hour travel demands. NTP have undertaken operational assessments for the A30 roundabouts with the Clyst-Honiton bypass and Bishop's Court Lane. Baseline traffic levels at the A30 north roundabout have been derived from traffic surveys undertaken by Devon County Council (DCC) on Thursday 8 February 2018. Noting restrictions on data collection due to the COVID19 pandemic the use of this data is considered a reasonable basis for assessment. NTP's analysis of traffic levels at the roundabout has indicated weekday morning and evening peak hours of 8-9am and 4.30-5.30pm.</p> <p>For the roundabout with the A30 westbound slip roads, NTP advise the following: <i>"...turning movements to and from Bishop's Court Lane have been taken from DCC's Cranbrook New Community Model Development and Forecasting Report (October 2021). By using the observed data from the A30 eastbound slip roads/ Clyst Honiton Bypass/ B3184 junction the westbound A30 slip road traffic movements have been calculated"</i>.</p> <p>Upon inspection of the Cranbrook modelling report, it appears that both roundabout junctions have been surveyed in full (both on 8 February 2018). As such it is unclear why any estimate of movements was required. National Highways request that NTP clarify data availability for the southern roundabout.</p> <p>The 2018 survey data has been growthed to 2022 and 2034 using RTF adjusted TEMPro growth figures for the East Devon authority area. The RTF adjustment has been undertaken on the basis of all road types, with resultant 2022 growth rates of 5.6% in the AM peak and 5.4% in the PM peak, and growth rates to a 2034 forecast year of 16% in both the AM and PM peak hours. The adopted growth rates are considered acceptable. National Highways Planning Response (NHPR 21-09) September 2021 NTP have not accounted for any specific committed development sites. National Highways advised as part of pre-application discussions that confirmation should be sought from East Devon District Council, the Local Planning Authority. The TA does not confirm whether this has been provided. National Highways has concern that the assessment should be accounting for committed development sites, including but not necessarily limited to, the Amazon parcel distribution centre on Werstan Road which post-dates the 2018 traffic surveys, and ongoing development at Cranbrook. Further discussion with East Devon District Council and Devon County Council should confirm committed developments and the availability of associated traffic forecasts.</p> <p>NTP have undertaken analysis of Personal Injury Collision (PIC) data obtained from DCC for a five-year period from 01/01/16 to 31/12/20. NTP's analysis identifies only one collision (resulting in slight injuries) at the A30 north roundabout. Our own analysis of data on the public access Crashmap website identifies a second collision at this</p>	

roundabout, along with three collisions (one fatal and two slight) around the A30 eastbound diverge. The fatal collision involved a single vehicle and single casualty in March 2020. Despite the presence of a fatal collision on approach to the junction, National Highways agree that the A30 Clyst Honiton bypass junction does not appear to have an existing safety issue that would be adversely impacted by the proposed development.

Traffic Generation and Distribution

NTP have estimated traffic generation on the basis of TRICS trip rates for the B2 Industrial Estate category and the B8 Commercial Warehousing category. Trip rates adopted by NTP are summarised in Table 1 below. Available TRICS sites have been filtered for edge of town sites.

National Highways has concern that the adopted trip generation may underestimate actual traffic volumes generated by the proposed development for two reasons; i) adopted B8 trip rates are lower than would be expected for the proposed floorspace; ii) the assessment of a mixed B2/ B8 development does not account for potentially higher traffic generation **National Highways Planning Response (NHPR 21-09) September 2021** associated with office uses, parcel distribution, or 100% B2 industrial uses that would all be permitted under the proposed LDO. National Highways require a robust assessment which takes into account the greatest traffic generating uses that could be consented by the LDO, to ensure that the development will not result in an unacceptable impact on the safe operation of the SRN, and any necessary mitigation can be identified and secured.

NTP have used 2011 Census journey to work data to determine a distribution for development traffic, based on the Middle Level Super Output Area (MSOA) in which the proposed development site is located (East Devon 006). Trips have then been assigned on an 'all or nothing' basis using Google Maps traffic directions. The resultant trip assignment indicates that 70% of development trips would route to/ from the A30 west and 15% would route to/ from the A30 east. The remaining 15% is assumed to split 10% via the B3184 east of the junction with Long Lane, and 5% via the Clyst Honiton bypass north of the A30 (towards Cranbrook). The distribution is considered acceptable for use in this instance.

On the basis of the adopted trip generation and distribution, NTP estimate that the proposed development would add 114 Passenger Car Unit (PCU) movements to the A30 north roundabout in the AM peak hour, and 122 PCU movements in the PM peak hour. At the A30 south roundabout, NTP estimate that the development would add 46 PCU movements in the AM peak hour and 65 PCU movements in the PM peak hour. Given the range of potential employment uses and development mix, National Highways do not accept that the estimated trip volumes provide a worst-case or robust assessment of potential traffic flow impacts for the A30. Instead, there is the potential that the estimated trip impacts could be an underestimate.

Impacts on the SRN

NTP have undertaken operational assessments for a 2022 baseline, and a 2034 forecast year with and without the proposed development. The assessment years are in line with scoping advice provided by National Highways.

Nevertheless, it is requested that an 'opening year' assessment is undertaken to confirm that overall forecast demand at the time of opening of the development can be accommodated by the existing infrastructure, in accordance with the requirements of DfT Circular 02/2013.

ARCADY models have been developed by NTP for both A30 roundabouts. No evidence is provided to indicate whether the 2018 base models have been validated against any available queue length data. NTP's modelling indicates that both junctions would operate with minimal queues (one vehicle or less) on all approaches in the worst case 2034 'with development' scenario. National Highways is unable to confirm the accuracy of this finding at the present time.

Alongside concerns over the build-up of assessment traffic flows, we also have the following reservations over the ARCADY modelling undertaken by NTP:

- Models do not account for unequal lane use on flared approaches to the roundabouts. Lane usage is notably imbalanced on the A30 off-slips and model adjustments should be considered to reflect uneven use of flared approaches. Adjustment for unequal lane use would be expected to reduce the scale of reserve capacity reported for the junctions.
- Geometric input data does not match our own measurements and does not appear to reflect the 'effective' entry capacity in all cases. Examples include the Clyst Honiton bypass approach where hatching appears to reduce the entry width, and the southbound approach to the A30 south roundabout where vehicles predominantly align in a single lane (indicated by the build-up of dust and gravel on the road surface). Geometries were measured by NTP using a combination of on-site measurements and estimations using Google satellite. It is recommended that Ordnance Survey mapping is used to illustrate and validate the extent of on-site measurements, and to review and document other measurements not taken on site, with allowance for 'effective' entry widths using online photography or site observations to document hatching or unused carriageway width on flared approaches.

The above changes to the NTP ARCADY models are required to provide an appropriate assessment of junction capacity and impacts for the A30 slip roads. It is recommended that geometric input data and adjustments for unequal lane use are agreed with National Highways ahead of updating model results.

Summary

National Highways has identified a number of concerns and queries with the submitted Transport Assessment. Specifically, the following matters are required to be addressed:

- Available survey information for the A30 southern roundabout should be confirmed by NTP and provided for review.
- Confirmation should be sought from the Local Planning Authority regarding committed development sites that should be accounted for in the assessment, and the availability of any associated traffic forecasts.
- Robust estimates are required to demonstrate the scale of traffic generation associated with the potential range of LDO uses. Estimates should thereafter inform operational assessments for the A30 roundabouts to demonstrate the potential scale of impact on junction performance.
- An assessment of development impacts at the year of opening is requested for the A30 roundabouts as in line with DfT Circular 02/2013
- Geometric measurements for ARCADY modelling of the A30 roundabouts should be reviewed using Ordnance Survey mapping, with the extent of on-site observations illustrated, and observations/imagery provided to inform effective entry widths.
- ARCADY modelling for the A30 roundabouts should also be reviewed to account for the effects of unequal lane use on junction capacity.

To allow the applicant time to address the above matters we are recommending that planning permission is not granted for of 3 months.

Recommendation

National Highways recommends that application reference 22/0914/LDO not be granted for a period of 3 months from the date of this recommendation. This is to allow time for the applicant to provide necessary details relating to the proposed development to enable National Highways to fully understand the impact of the development on the safe

and efficient operation of the strategic road network, and thereby provide the Local Planning Authority with fully informed advice.

25th September 2022

Previous Consultation

National Highways were consulted on the application when it was first made in May 2022 and responded on 1 June 2022 with a recommendation that planning permission should not be granted for a period of three months to enable the applicant to provide additional information. The specific information required was summarised as:

- Available survey information for the A30 southern roundabout should be confirmed by NTP and provided for review.
- Confirmation should be sought from the Local Planning Authority regarding committed development sites that should be accounted for in the assessment, and the availability of any associated traffic forecasts.
- Robust estimates are required to demonstrate the scale of traffic generation associated with the potential range of LDO uses. Estimates should thereafter inform operational assessments for the A30 roundabouts to demonstrate the potential scale of impact on junction performance.
- An assessment of development impacts at the year of opening is requested for the A30 roundabouts as in line with DfT Circular 02/2013
- Geometric measurements for ARCADY modelling of the A30 roundabouts should be reviewed using Ordnance Survey mapping, with the extent of on-site observations illustrated, and observations/imagery provided to inform effective entry widths.
- ARCADY modelling for the A30 roundabouts should also be reviewed to account for the effects of unequal lane use on junction capacity.

Northern Transport Planning (NTP) have provided additional information directly to National Highways to address these matters, copied to East Devon District Council (EDDC). We request that this information together with our written responses is uploaded onto the Local Planning Authority website to ensure it is available for review by all parties. In order to address the requests for additional information and following a meeting on 14 June 2022, NTP submitted additional information by letter on 27 June, and a Supplementary Transport Assessment (STA) 21 August 2022. Following National Highways email responses to this information on 08 July and 01 September 2022, it was agreed to hold a meeting between all parties to agree a route to resolving the last outstanding matters. The meeting was held on 06 September 2022 and it was agreed to provide the final information in two stages which would allow the predicted traffic flows to be agreed prior to the modelling being undertaken. The final trip rates were provided on 07 September 2022 and approved on 08 September 2022, with the revised junction assessments being provided in a further STA on 15 September 2022 and agreed on 16 September 2022.

The information provided to address each of the matters of concern is summarised below.

A30 Airport Junction Traffic Data

The TA used 2018 traffic count data for the northern A30 Airport Junction roundabout but relied upon flows for the southern A30 Airport Junction roundabout. The southern roundabout had also been counted in 2018 and NTP have now adopted this observed data.

Committed Development

The 27 June letter from NTP maintained the position that there was no requirement for committed development to be included in addition to TEMPRO growth. National Highways confirmed that there was still a requirement to include committed development at Cranbrook as it was of sufficient size that it could not be considered to be contained within the average growth rates derived from TEMPRO. NTP have now accounted for future build out of the Cranbrook development in line with a methodology agreed as appropriate for the current application.

Traffic Generation

The trip generation rates associated with the B8 Warehousing use were updated for the 27 June NTP letter and were accepted as appropriate for General Warehousing in the 08 July National Highways response. The response also identified the need to consider trip rates associated with parcel distribution centres that also fall within the planning Use Class. This was reiterated in the 01 September response and was addressed by NTP in their 06 September email. NTP have now adopted agreed trip rates for parcel distribution uses and have assessed a scenario to cover 10,400sqm of B2 and 15,600sqm of B8 employment uses with 50% of the B8 use considered as parcel distribution centres.

Assessment Years

The application TA provided an assessment year of 2034 which is consistent with the future year assessment required by DfT Circular 02/2013, being the end of the Local Plan period. An opening year assessment of 2027 was agreed at the meeting on 14 June and confirmed in the NTP letter attached to the 27 June email from NTP. The opening year and future year base traffic flows have been derived by applying growth to the 2018 observed traffic counts using TEMPRO growth rates, as previously agreed. National Highways response of 08 July also required residual committed development at the Cranbrook site to be included in addition to the TEMPRO growth.

Geometric Measurements at A30 Airport Junction Roundabouts

As set out in our response dated 9 July 2022, updated geometric measurements for use in the ARCADY assessment are accepted by National Highways.

ARCADY Unequal Lane Usage

The applicant submitted a second STA on 16 September 2022 which sought to account for the unequal lane usage by treating the entry arm as a single lane. On the basis of this revised assessment National Highways are satisfied the traffic impact of the development is unlikely to result in an unacceptable impact on the safe operation of the A30 trunk road, as defined by NPPF.

LDO Conditions

EDDC have confirmed that should the LDO be permitted it will be subject to conditions requiring the provision of a CEMP prior to the construction of any phase of the development together with a Travel Plan. On this basis National Highways are not requesting any additional conditions be applied to any consent EDDC is minded to grant, **subject to** National Highways being consulted on the submitted CEMP and Travel Plan.

Recommendation

Following consultation with National Highways (NH) a Supplementary Traffic Assessment (no.2) was undertaken in respect to the proposed impact upon the strategic highway network and submitted to NH for consultation. Following submission of the additional data NH have removed their holding request. A CEMP is required under a condition on the LDO in which NH will be consulted.

The Travel Plan Framework formed part of the documents consulted upon as part of the formal LDO consultation. A condition on the LDO requires all development to submit and obtain approval for a Travel plan and implement accordingly.

The supplementary information has also been forwarded to the Local Highway Authority whose position remains unchanged.

	<p>National Highways has no objection to application 22/0914/LDO subject to the above conditions requiring the submission of a Construction and Environment Management Plan and Travel Plan being applied to any permission, and upon which National Highways must be consulted.</p>	
<p>Natural England</p>	<p>Habitats sites</p> <p>Based on the plans submitted, Natural England considers that the development included in the LDO will not have likely significant effects on the East Devon Pebblebed Heaths SAC, East Devon Heaths SPA, or the Exe Estuary SPA and has no objection to the proposed development.</p> <p>To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out. The following may provide a suitable justification for that decision:</p> <ul style="list-style-type: none"> • The LDO site is not within close proximity of the Habitats sites, and so there are unlikely to be direct impact pathways; <ul style="list-style-type: none"> • The LDO does not include any proposals for: <ul style="list-style-type: none"> - residential development that could result in recreational disturbance; or - industrial or agricultural development that could result in air pollution; and - the LDO specifically excludes development that involves incineration, chemical treatment, landfill, or the processing or storage of hazardous or inert waste. <p>Sites of Special Scientific Interest (SSSI)</p> <p>Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the Exe Estuary SSSI, East Devon Pebblebed Heaths SSSI, or the Stoke Woods SSSI sites have been notified and has no objection.</p> <p>Protected species</p> <p>The Local Planning Authority (LPA) in exercising their functions “must have regard to the requirements of the Habitats Directives so far as they may be affected by the exercise of those functions” (Regulation 9(3) of the Habitats Regulations). In order to comply with this duty the LPA can only grant planning permission for development that would affect a European Protected Species on the basis that:</p> <ul style="list-style-type: none"> • The proposed development is in accordance with Article 12(1) of the Habitats Directive, which relates to the protection of species. • The proposal would be likely to receive a Protected Species license from Natural England, if required. The LPA should ensure they are compliant with the requirements of the Habitats Directive and Regulations before adopting a LDO. <p>Page 3 of 6</p> <p>We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species. The Standing Advice includes a decision checklist which provides advice to planners on deciding if there is a ‘reasonable likelihood’ of protected species being present. It also provides detailed advice on the protected species most often affected by development. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.</p>	<p>A Habitat Risk Assessment has been undertaken and a likely significant effect has been ruled out.</p>

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted. If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

The development should seek to avoid adverse impact on sensitive areas for wildlife within the site and provide opportunities for overall wildlife gain.

It would be advisable that the following mitigation measures be conditioned in the planning permission:

- A Construction Management Plan (CEMP) to detail how hedgerows and trees will be protected, to ensure no impacts on the quality of water courses or bodies and how dust will be controlled during construction; and
- A Landscape and Ecology Management Plan (LEMP).

Protected Landscapes

The proposed LDO site is within 5km of a nationally designated landscape, namely East Devon AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraphs 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies. Page 4 of 6

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development. The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Best and Most Versatile Agricultural Land

From the documents accompanying the consultation we consider this application falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, as the proposed development would not appear to lead to the loss of over 20 ha 'best and most versatile' (BMV) agricultural land. For this reason, we do not propose to make any detailed comments in relation to agricultural land quality and soils, although we do note that a substantial part of the site is recorded as Grade 3a ALC land. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through appropriate site design / masterplan / Green Infrastructure. Natural England would advise that any grant of planning permission should be made subject to conditions to safeguard soil resources, including the provision of soil resource information in line with the Defra

A Construction and Environment Management Plan is required under a condition on the LDO.

A Landscape Environmental Management Plan is required by Design Code to ensure long term landscape and ecological management of the site.

Section 05 A of the Design Code sets out measures to be undertaken to protect ecology and biodiversity.

The AONB partnership has been consulted on the LDO – no comments were received.

guidance Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Further guidance is available in The British Society of Soil Science Guidance Note – ‘Benefitting from Soil Management in Development and Construction’ - which we recommend is followed in order to safeguard soil resources as part of the overall sustainability of the development.

Local sites and priority habitats

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geo-conservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely.

Environmental gains

Development provides opportunities to secure a measurable net gain for nature as outlined in paragraphs 174 and 180 of the NPPF and within the Defra 25-year Environment Plan. Strategies 3 and 5 of the East Devon Local Plan Policy also expect developments to contribute to the enhancement of the natural environment and biodiversity. We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal.

Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England’s Biodiversity Metric 3.1 may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the Small Sites Metric may be used. This is a simplified version of Biodiversity Metric 3.1 and is designed for use where certain criteria are met. It is available as a beta test version. You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.

	<ul style="list-style-type: none"> • Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links. • Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore). <p>Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside Biodiversity Metric 3.1 and is available as a beta test version.</p>	
EDDC Strategic Policy	Further to our discussion I can confirm that we support the LDO and consider that it is in conformity with the adopted Local Plan and the emerging Local Plan.	
EDDC Economic Development	<p>It's clear how much work has gone into this. The site will increase the appeal of our existing EZ. The LDO Statement of Reasons sets out how the proposals are consistent with existing Local Plan strategies and policies. The degree of investment required to essentially unlock this site highlights the importance of it coming forward to our district economy. We've seen substantial amounts of commercial development take place in recent years which has provided much needed new jobs, though in less preferable locations in the district. This site is particularly well located for a range of employment generating uses and is an ideal location to provide valuable new jobs and careers for up to 500 local residents into the future. The mix of uses proposed meets existing demand whilst maintaining flexibility to adapt to future changes. The potential the site offers for future collaborations around aerospace, sustainable aviation and future skills is positive and something we should seek to encourage/support. The simplified planning process is an important attractor to promote whilst the need to satisfy the LDO protects this valuable site from uses which offer less beneficial economic and employment outcomes. A lot of thought has gone into this LDO and the site's potential capacity to support the operation of the airport. Keen to see this focus preserved when it comes to future tenants/operators.</p>	
Exeter Airport	<p>Prior to this formal consultation exercise EDAL were invited as a key local stakeholder to comment informally on the emerging draft LDO as it was being prepared, and then to discuss their views with Officers and their consultant team. Through that process a number of significant concerns were raised by EDAL. Some of those have been addressed through the drafting of the consultation material but others have not. The comments set out here are framed accordingly. In participating in the informal consultation process EDAL made it clear that they were not opposed to development of the type proposed, per se. They acknowledged that there are some clear advantages in bringing this land forward for employment use, and indeed in seeking to expand further the employment provision around this location generally. Rather, their concerns reflected a view that the approach and evidence as presented to them was not robust enough to allow such development to proceed. They noted that unless that was remedied it could very well create considerable difficulties for the Airport. For the reasons set out below it remains the case that EDAL's concerns have not been sufficiently addressed and so this document should be understood as an objection to the LDO. That said, it is considered there may be means through additional analysis to provide further information such that EDAL's concerns could be allayed. EDAL would be pleased to continue to engage with EDDC to support that process.</p> <p>The Statement of Reasons for the LDO rightly observes (paragraph 2.3) the intention for it to provide "clarity and certainty for development". Given the nature and extent of what the LDO would allow – up to 26,000 sq m of</p>	<p>The contents page of the Design Code has been amended to refer to Technical Parameters.</p> <p>The document titled "Planning Parameters Design Code" is required to be complied with, however the items covered from the</p>

development across a range of uses and over a ten-year period – this is absolutely fundamental. However, it is not considered that this is achieved in the material as drafted, for a number of reasons. First, the “Development parameters” are central to what the LDO would allow. They are defined in the LDO by Tables 1 and 2, plus what is referred to as the “technical parameters” set out in the Design Code. The contents page of the Design Code does not refer to “Technical Parameters”, but Section 5 of the document is in fact titled “Technical Parameters”. That lists documents “associated with Planning Parameters” and summarises those documents. The LDO conditions (Appendix B) require compliance with the “parameters and conditions” set out in the LDO and Design Code; it is assumed those are again the “Technical Parameters”, but this is not clear. This position is confused and inconsistent. Absolute clarity is needed in this regard. Is it the intention that the parameters will be set solely by Tables 1 and 2 and then the content of Section 5 of the Design Code, or also by the full content of the additional documents to which it refers? Moreover, Section 3 of the Design Code aims, “to set out guidelines and parameters” for development whilst Section 4 of the Design Code is intended, “to form the basis of parameters”. Do Sections 3 and 4 of the LDO form part of the “Development parameters”? Section 10 of the LDO appears to take a more overarching approach as it simply requires compliance with the Design Code, i.e. presumably all of that document (but again it is unclear as to whether this would extend to the full content of the additional documents referred to in Section 5). A simple, clear statement is required in this regard within the LDO, and consistent terminology should be used throughout. It should be made immediately obvious to the reader specifically what development must comply with, alongside Tables 1 and 2, i.e. whether the Design Code in its entirety, or specific sections from it, and either including or excluding the full content of supporting documents.

Second, the LDO makes development referable to Plan 2, which includes an indicative location for an attenuation pond. If the supporting documentation is read it is indicated in places that this feature is principally intended to be dry, and that is of critical importance to the operation of the airport. That said, it is also shown as a pond elsewhere, for example on the Indicative Masterplans at pages 26, 28 and 33 of the Design Code. For consistency and the avoidance of doubt, noting the importance as well of the LDO being capable of easy interpretation on its face, Plan 2 should be amended to reflect the fact that any such feature must be designed to be dry except for the allowable short period in an extreme event. This should be applied consistently through all associated material.

Third, and again mindful of the need for precision to ensure full understanding and proper implementation, the list of documents in the “Evidence Base” at section 4 of the LDO is incorrect, and inconsistent in places with the Design Code and the material provided to support the consultation. The position is confused. For example: Reference is made in the LDO to, “Ecology assessments prepared by Paragon”. The Design Code refers to, “Ecology Assessments & Biodiversity Strategy” and separately shows the cover page of a “Preliminary Ecological Appraisal” prepared by Wharton. The background document appears to be an “Ecological Impact Assessment” prepared by Wharton. It is not clear which of these documents is to be adhered to. The LDO refers to, “Contamination reports” but the evidence appears to include just a single document titled, “Phase 2 Ground Investigation Report”. It is assumed that it is this single document that is of relevance, but that is not clear. The LDO refers to, “Flood Risk Assessments prepared by Paragon”, when it appears that there is just a single document prepared by a different author (GeoSmart). This should be corrected. Reference is made to a, “Drainage and SUDS Strategy prepared by Paragon and Waldeck”, when in fact it appears there are two documents (a Sustainable Drainage Assessment prepared by GeoSmart, and a Drainage Strategy prepared by Waldeck).

start up to the end of Section 4 are generally addressed as a technical parameter in Section 5. Section 3 is a general background of the development with indicative proposals that go on to read “can be implemented”, as opposed to must. Where it has been agreed that certain items must be included in the parameters, these are then captured accordingly.

To ensure clarity the wording of Condition 2, Appendix B, has been amended to;

“Development and uses permitted by this Order shall be carried out and maintained in complete accordance with the LDO and the accompanying Planning Parameters Design Code, with the exception of minor variations submitted to and approved by the LPA.”

Plan 2 has been amended, removing the blue colour from the SuDS area and referring to the area as Indicative Dry Attenuation Pond Location. The parameters in the design code restrict the use of permanent water features and acknowledge the requirement to meet the drain down times for aviation safety (Appendix D within Section 5).

The ecology document clearly has a Paragon stamp on the front page who are the overarching consultant. The heading of the page in the Design Code States “Ecology Assessments” and the snippet of the front page is to enable ease of reference. The parameters are summarised within this section of the Design Code document.

If it is these two documents that are of relevance they should be properly identified. The full schedule of documents has not been reviewed for consistency and there may be similar issues with the other reports identified, but the difficulty is clear from the examples listed above. This is a very simple point. The full suite of supporting documents needs to be properly listed and referred to correctly and consistently throughout.

Fourth, it is considered that drafting amendments should be made to the conditions set out at Appendix B to the LDO including: The Reason specified for Condition 5 includes that it is required to ensure, “adequate facilities are available for construction and other traffic attracted to the site”. This is important given the proximity of the site to extensive existing employment areas and of course the airport, but the actual wording of the condition makes no reference to the measures to be required in this regard. The condition should be amended to require details to be approved of, for example, construction operative, plant and delivery traffic routing, parking and manoeuvring, plus sites set up in relation to (for example) amenity facilities and storage of materials. Condition 10 requires accordance with, “an approved Aerodrome Safeguarding Assessment” for all buildings but does not specify who will be responsible for such approval, or how approval must be secured. As a minimum reference should be made to the requirement to submit the Assessments to and have them approved by EDDC, but it would also be highly advisable additionally to state this should be in consultation with EDAL. This will avoid unnecessary delay for the developer. None of these matters is complicated but they are all important. It is essential that the LDO is carefully, clearly and correctly drafted or there is a significant risk it will fail to control adequately the type of development that may be delivered at Long Lane for a decade.

Several of the comments made above in relation to the LDO speak to amendments or points of clarification that should be made to the Design Code. Those are not repeated here. Rather, a number of observations are made in terms of aspects of the detailed content of the Design Code. More extensive comments specifically in relation to highways are made separately to follow.

First, the Design Code properly acknowledges (page 19) that, “the constant activity and noise from the airport will need to be fully considered as part of the design proposals.” However, the supporting Noise Assessment does not consider this point. For some of the uses that would be allowed by the LDO – such as offices and education facilities – this is a particularly important constraint. Even absent a detailed design it should at this stage be readily possible to make an assessment as to whether an appropriate noise environment can be delivered within a building that would be allowed by the proposed parameters in specific uses, and what design features would be required to achieve that. As it stands the LDO would (for example) effectively grant permission for a school or office building next to a runway without any understanding of whether this is acceptable in noise terms. That cannot be right. Second, the Design Code lacks precision in places. As discussed above it is currently unclear which parts of it are intended to govern development. However, if Section 4 is included in this then use of phrases such as, “how Local Development Orders could be formed” (page 32) and “the design code hopes to” (page 33) should be avoided.

Third, the approach to car parking is inappropriate. This is important because of the car parking pressures already associated with neighbouring businesses and, in particular, the airport. Unless this aspect is properly controlled it will lead to conflict and dissatisfaction for all local occupiers. The LDO does not provide any mechanism beyond the guidance in section 5L of the Design

Within Section 4 (Evidence Base) of the LDO references to “reports”, as in plural, has been changed to “report” where relevant.

The FRA document clearly has a Paragon stamp on the front page who are the overarching consultant. The heading of the page in the Design Code States “Flood Risk Assessment” and the snippet of the front page is to enable ease of reference. The parameters are summarised within this section of the Design Code document.

The actual design parameters for drainage and SuDS are set out in the Waldeck document which is cross referenced and shown in Section 05 D of the design code. The Paragon document is a pre-assessment to determine feasibility of features around the site and provides a background to this element. The parameters are summarised within the Design Code Section 05 D. For clarity the Paragon reference has been removed.

An updated Acoustic Planning Report has been prepared with requirements for sound insulation. Section 05 J of the Design Code includes a parameter to ensure buildings are designed and constructed so that external noise generated from the airport does not have an adverse effect on noise levels in the buildings.

The Design Code has been amended to provide clarity on how the development will come forward.

East Devon District Council Local Plan does not have a policy regarding car parking requirements for employment uses.

Code to control car parking. So, for example, it would be permissible on this basis to provide 1 space per 200 sq m of B2 space when such employment might well be created at a density greater than 1 job per 40 sq m – in other words there could be five or more workers per parking space. Equally, the LDO would allow up to 2,600 sq m of office space and for this to be served by as few as 13 parking spaces (1 per 200 sq m). Office development of this scale could certainly employ 130 people (and in likelihood many more) meaning there could be ten or more workers per parking space for this element. Again, this cannot be right. A mechanism must be put in place within the LDO to ensure that adequate car parking is provided to suit each use, rather than rely on the very widely drawn ratios that are currently specified.

Fourth, the “Access and Connections” commentary on page 36 states that the widening of Long Lane will facilitate a cycle lane. This is not the case, and cycle access will in fact be provided by the new Silverdown link. This should be clarified, and adequate cycle access along Silverdown link should be a requirement.

Fifth, the surface water drainage strategy within part D of the Technical Parameters section has relied on disposal of surface water and treated foul water via the 700mm culvert beneath the northeast corner of the proposed development site. It is stated that such connection is to be made under “assumed riparian rights”. Such rights, if established, carry an obligation not to cause damage or flooding downstream. There has been no attempt at establishing the condition and capacity of the culvert beyond the section on the site itself and, as the ability to utilise the wider culvert network beneath an operational airport, and particularly its runway, is so fundamental to the development under the LDO, the wider culvert capacity and condition must be investigated and proven capable of transmitting the additional flows proposed without damage and / or collapse. Such investigation and, if necessary, improvement by the developer must be a condition to be satisfied prior to the development being commenced. This is indicated in the first bullet in the final column of page 48. As discussed above the final LDO must make clear that compliance with this section of the Design Code is required, and the text of this bullet point should also be amended. It must make clear that a survey is required of the watercourse including the culverted section, and specifically that crossing the airport. It must also make clear that the requirement should not only be to address the function of the culvert and potential flood risk, but also to secure the structural integrity of the culvert.

Sixth, and finally, as a minor point of correction, the reference on page 38 should be to Supporting Document “M” rather than “N”.

The informal comments made by EDAL during the preparation of the LDO expressed fundamental concerns with the supporting Transport Assessment (TA), its approach to trip generation, and the likely impacts of that, including in particular the queuing traffic it indicated would arise back along Long Lane from the B3184 past the entrance to the airport. The TA has been revised to support this formal consultation (now dated 5th May 2022), but those fundamental concerns remain. The TA is based on an assumed development comprising 10,400 sq m of B2 (40%) and 15,600 sq m of B8 uses (60%). This is crucial to the analysis in circumstances where the TA indicates trip rates associated with B2 use are nearly six times those associated with B8. The maximum amount of B2 activity allowable by the LDO is 10,400 sq m. However, the amount of E(g)(iii) activity would be unlimited (up to the overall cap of 26,000 sq m) meaning that the development could in its entirety comprise E(g)(iii) use or (say) 10,400 sq m of B2 and 15,600 sq m of E(g)(iii). Trip rates for E(g)(iii) activity are typically assumed to be the same as those for B2, i.e. nearly six times those associated with B8.

Informal and formal consultation has been undertaken with the Local Highway Authority to ensure the development has an adequate approach to car parking considering the flexible nature of the LDO. With the site forming part of the Exeter and East Devon Enterprise Zone there is a strong focus on sustainability. As such the Travel Plans will need to ensure adequate measures are implemented to support sustainable travel to and from the site where possible.

Reference to a cycle lane has been removed from section 04 Guidelines for Design, Access of the Design Code. The Silverdown Link has been provided as part of the Long Lane road improvement scheme with the intention of it to provide a safe cycle route and bus gated.

The development will not transmit additional flows, the development will reduce the existing greenfield run off rate as highlighted within the drainage strategy and agreed with the Lead Local Flood Authority.

As there is no existing record of flooding in the current arrangement, a reduction from existing flows will provide a betterment. A condition survey is being undertaken and any defects identified will need to be rectified by the relevant land owner.

Page 38 of the Design Code has been amended to refer to supporting document “M”.

Section 6) Permitted Uses (Table 2) of the LDO has been amended to add a restriction on Use Class E (g) iii) Any industrial process to a maximum of 2,600 sqm GEA, to reduce

This means that the TA relies on 60% of the deliverable floorspace generating trips at a fraction of the rate that would actually be allowed by the LDO. This is simply wrong. If development is to be allowed by the LDO on a flexible basis, then the highways analysis must be undertaken in a way that assesses properly the different outcomes allowed for. It cannot arbitrarily model more than half the development using a trip rate which is very substantially lower than that which could be generated. This point is reinforced by the allowance made in the LDO for up to 2,600 sq m of office space. This too would generate trips at a far higher rate than the B8 activity allowed for in the TA. A similar point was made by EDAL through the informal consultation process. The amended TA now generates results which indicate less (although still substantial) queuing back from the Long Lane / B3184 junction than was previously estimated. However, it does this on the basis of greater trip generation associated with the LDO development (about an 11% increase in weekday peak hour passenger car units compared with previously). In other words, the TA adopts a revised balance of uses which generate more trips but seem to lead to reduced queuing. Intuitively, this is immediately questionable. The explanation for this anomaly is provided at paragraphs 3.5.4 and 3.10.2 of the TA. Whereas in the previous draft of the TA, in accordance with convention, and as still assumed for the rest of the network, a standardised growth rate is applied to allow for increased background traffic through time, the TA now assumes no growth for background traffic turning to and from Long Lane and the airport car park at the junction with the B3184.

To be clear, then, the standardised growth rate was previously applied universally, as is routinely the case with such exercises. It is now applied universally apart from in relation to the junction where the problematic queuing was identified. The TA seeks to justify this (paragraph 3.5.4) by suggesting that growth cannot happen without development requiring planning permission or with a change in operations which would also require planning permission. This is wrong. It is perfectly possible that the existing businesses accessed from Long Lane will intensify and grow their operations from their existing premises.

Equally, the airport has plans in place to grow their business as the recovery from the pandemic continues. Moreover, and importantly, the airport benefits from extensive permitted development rights. Development in connection with the provision of services and facilities at the airport is allowed without the requirement for planning permission and with relatively few restrictions. The approach taken now by the TA to exclude growth from this junction cannot be supported. Again, it is simply wrong.

In summary, the TA adopts a trip generation rate very substantially less than would be allowed by the LDO and unjustifiably removes growth from a single troublesome point on the network. However, even on this basis peak hour queues of 21 vehicles back from the Long Lane / B3184 junction would still be created (compared with 4 vehicles without development), extending well beyond the entrance to the airport and the residential property opposite it. At the same time the RFC (a measure of junction capacity) would go from an acceptable maximum of up to 0.80 (without development) to an unacceptable value with development of up to 1.03 (a value of 0.85 is typically considered to represent the limit of capacity).

In simple terms with the development added the junction goes from working within capacity to operating over capacity and the queue increases fivefold to a point well beyond that which blocks the entrances. If the mix of development allowed for by the LDO was modelled and growth properly incorporated this unacceptable position would of course be significantly worse. The TA seeks to provide some comfort by including analysis which smooths out peak flows but there is no way of controlling this, the figures again cannot be relied upon as they do not reflect the proposed mix of uses or allow for growth, and even on this basis they still point to some exceedance of capacity. The suggestion is made by the TA (paragraph 4.3.8) that the harm arising from this might be mitigated by a yellow hatched box, but this would not be effective for cars turning right out of the airport or left out of the dwelling unless there was clear space outside the box junction to turn into, which would not be the case with the modelled queue. The TA

the potential highway impacts that may arise from not having a restriction on the quantity of development permitted under this use class.

The basis for the Transport Assessment has been agreed with the Local Highways Authority and National Highways. It has been agreed with the Local Highways Authority that TEMPRO traffic growth to the Future Assessment Year 2034 will not be applied to the observed traffic using Long Lane, or to the traffic observed using the Airport car park immediately south of the Long Lane/B3184 junction. By expert judgement, this is more realistic than applying traffic growth because without some physical expansion, which would normally require planning permission, there is no reason to consider that the traffic associated with the existing development which uses Long Lane will simply increase over time.

For the avoidance of doubt, TEMPRO traffic growth to 2034 is still be applied to the 'straight through' traffic movements passing through the Long Lane/B3184 junction, and to all traffic movements at the A30 roundabout junction.

The Local Highways Authority have acknowledged that by the 2030's the junction will be at capacity even without the proposed development coming forward and the junction will need to be reviewed by them in any case.

Following the consultation process both the Local Highways Authority and National Highways concluded no objections to the scheme. Taking these comments into account East Devon District Council consider

highlights the design shortcomings of the Long Lane / B3184 junction and that options are available for its improvement. Improvement to a satisfactory level to deal with this issue must be a requirement to be imposed by the LDO. The TA shows that the junction will not work with the LDO development in place. The degree of that failure would be materially greater if properly modelled. Analysis must be undertaken to explore the options for its improvement and the extent to which they would mitigate the impact, properly measured. The LDO should only proceed if an adequate solution is found, and its implementation secured.

Conclusion

A series of comments are made in relation to the drafting of the LDO. None of these is complicated but they are all important. It is essential that the LDO is carefully, clearly and correctly drafted or there is a significant risk it will fail to control adequately the type of development that may be delivered at Long Lane for a decade. EDAL consider that the text of the LDO should be amended accordingly. Further comments are made in relation to the Design Code on which the LDO relies. Some of these are minor drafting points which can easily be resolved but two – relating to noise assessment and the control of car parking – require more careful attention. Further analysis and then revisions to the LDO are required to address this. Certainty is also required in terms of securing the work necessary to ensure the effective operation of the proposed surface water drainage solution.

Finally, fundamental concerns remain in relation to the analysis of traffic. It is flawed in terms of the assumptions it makes around trip rates, and the exclusion of traffic growth on a crucial part of the network. Even with these flaws the impact it estimates for a key junction and the ability for vehicles to use the airport is unacceptable; with more appropriate modelling that impact would be significantly worse. It is hoped that the comments made around drafting can be easily attended to. If they are dealt with EDAL would have no difficulty in that regard. However, the matters around noise, car parking, drainage and – in particular – traffic generation are significant. EDAL wish to register their objection to the LDO on this basis. EDAL would be pleased to continue to engage with EDDC to support the work required to seek to resolve these issues.

In a document dated 18 May 2022 the response of EDAL to that consultation was set out in terms of a range of Town Planning matters. That document explained that the concerns expressed by EDAL during informal discussions with EDDC had not been sufficiently addressed and as such it expressed EDAL's objection to the LDO. It also observed that there may be means through additional analysis to provide further information such that EDAL's concerns could be allayed, and that EDAL would be pleased to continue to engage with EDDC to support that process. Following their submission of 18 May EDAL have noted a number of responses provided by other consultees. This, second, representation to the LDO consultation provides the further brief comments of EDAL in relation to comments made by one of those consultees in relation to highways, which is a key area of concern for the Airport.

Devon County Highway Authority (CHA)

The CHA response (dated 30 May 2022) acknowledges that there would be additional queuing at the Long Lane / B3184 / Airport car park junction. It does not comment on the extent of that queuing, and neither does it grapple with the fundamental issue highlighted in EDAL's previous submissions that the modelling conducted to support the LDO does not come close to reflecting the maximum amount of traffic that would be allowed. The queuing could be very significantly worse than assumed in the formulation of the LDO. This needs to be recognised, fully assessed, and properly taken into account in the LDO. The CHA notes that there is no commitment to provide or contribute to the mitigation required to address this issue. Clearly, the matter needs first to be properly assessed, but once it has been

that the benefits of the potential employment that may be created from enabling a mix of uses on the site, combined with the improvements being implemented under the Long Lane Road Improvement Scheme, outweigh the highways impact of additional trip generation and queuing on the Long Lane/B3184 junction. It is considered that there is a need to support other employment uses coming forward in the area. Given the lack of objection from the Highways Authority and National Highways it is not considered appropriate to further restrict the permitted uses on the site.

	<p>there must be a commitment to the up-front funding and provision of improvements (including junction enhancement) which would demonstrably address it. All highways and traffic matters must be resolved before the LDO is granted. The CHA recognises that a detailed CEMP will be required. This requirement must be embodied within the LDO. Its provisions must include those concerned with highways – such as delivery routes, delivery / manoeuvring areas, operative and visitor car parking, and so on – as well as those concerned more generally with method and amenity.</p> <p>Conclusion The original submissions made by EDAL to the LDO consultation included various comments on drafting, plus the Design Code and aspects of its technical content. Those comments remain relevant. The original response also raised fundamental concerns in relation to the analysis of traffic. Those comments remain and should be understood in the context of the further observations made above. It remains the case that EDAL wish to register their objection to the LDO. It remains the case that EDAL would be pleased to continue to engage with EDDC to support the work required to seek to resolve these issues.</p>	
<p>Devonshire Freemasons</p>	<p>Whilst I am very supportive of the proposal in general, I wish to submit a point that I believe requires some serious consideration in relation to the regular flooding of Long Lane near to the junction with the Future Skills centre and towards the Industrial Units at Harrier Court. This is at the southern end of the proposed development and adjacent to an old "Pill Box" at the side of the road. I have been working at Harrier Court since 2019 and that part of the road regularly floods whenever there is heavy rain. There have been numerous occasions where it has become impassable on a motor scooter and I have returned home to use my SUV to access my workplace. The depth of the floodwater can be as much as 12 inches and it takes two days to subside. It seems to be much more prevalent since works began last October when the road was closed for three months whilst the road surface was dug up to put large blue pipes under the surface. The water appears to run out of the field on its southern edge and into the road and flood across the width of the road. I note on the planning documents that there is no mention of such flooding issues on either Appendix C or Appendix D. My observations can be verified by any other users of the units at Harrier Court who also have to negotiate the floodwaters on what seems an increasing number of occurrences. I submit this information for your consideration.</p>	<p>The flooding of Long Lane is outside the control of the development if impacted by catchment areas of the existing highway. Furthermore, the development shall retain surface water run off for the site area and convey water through the appropriately design SuDS features before discharging north east of the site via the culverted watercourse. As part of the highways improvement works (not within the remit of this development), a surface water swale is being implemented opposite the entrance to the future skills centre on the southern side of this site.</p>
<p>Elizabeth Hunt</p>	<p>I object to this development of current useable arable farm for the development of a business park on the grounds that too many of the arable land in England is being destroyed resulted in the loss of food productivity when we have the largest population of people per Area amongst the Western World. We are an Island race and our seas are being over fished and polluted by run off and disposal of waste at sea; drilling and such like. Climate change will mean that we will have to be more efficient in our use of arable land to provide food for our population; secure more water as temperature rises and reduce the carbon footprint of production of goods that our descendants may not have the power resources to feed. Further more, the natural habitat of wild animals and pollinators needs to be persevered. In view of what has happened to world food supplies due to the Russian invasion of Ukraine with the dual affect of the Russian effect on the supplies of energy whilst inflation here is causing families to become impoverished with little food or heating or cooked food, this site should remain a food production /water conservation sites. Similarly other sites too. Furthermore, more planning for housing should be including more low rises flats with landscaping and allotments for each low rise block. This would enable people indigenous to this area to be able to buy a flat when young and married and the elderly. Instead we get small houses with handkerchief lawns that quickly get substituted</p>	<p>The proposal would result in loss of agricultural land, however the majority of the site has been allocated for development under the Local Plan. The Council consider the benefits of increasing employment land in the area outweigh the impact from the loss of agricultural land in this instance. The LEMP will ensure long term maintenance of the landscaped areas for the benefit of ecology and the landscape. The site is not considered suitable for housing, moreover the development of housing at Cranbrook increases the need for more employment</p>

	<p>for artificial grass that is non recyclable and is very damaging to the soil; water table and animal. There are plenty of newly built office blocks under-utilised that could be removed for other types of light industries. We must act to save our world now and try and prevent starvation in the coming years.</p>	<p>development in the area to provide local jobs.</p>
<p>Trevor Johnson</p>	<p>I write to express my concerns regarding the above planning application for a Power Park using Long Lane as a means of access. Long Lane is a Single lane country road in rural countryside. The predicted increase in traffic from the proposed Power Park with up to 500 employees who will mainly drive to work plus all the visiting vehicles, many of them large commercial and heavy goods articulated vehicles servicing the Power Park Businesses will cause long delays and heavy congestion. Having lived on Long Lane in excess of 35 years I can advise that prior to the Covid Lockdown when flights were cancelled and traffic reduced to essential use only there were often long queues of stationary traffic, sometimes further than 100mts, blocking entrances including the Airport, Little Orchard, Exeter Park 2 Fly, Boyce and Co. and Sparex, this caused a high level of air pollution and traffic noise in the area. These hold up's can be greatly exacerbated at times by vehicles stopping to pick up and drop off passengers in no waiting areas causing extra congestion. To the left of the Airport entrance/exit Long Lane is narrow, large vehicles are unable to pass and it is prone to flooding, highways have spent many day's trying to fix the problem but it still floods. Further along Long Lane toward the Hotel and Skill Centre the road was closed at the end of last year for several months to enable a new surface water drain pipe to be installed for South West Water, the outfall to this drain is into a wooded/scrubland area. After periods of wet weather a large pond forms which then overflows through the hedge leading to further deep flooding for a considerable distance making it impassable for pedestrians, small vehicles, motorcycles etc. Would it not be better to close Long Lane adjacent to car park 4 which would still allow access to the Airport, the many business's on the Airport Ind. Estate, the large aircraft maintenance hanger and car park 4 and allow the traffic from the proposed Power Park to use the Silverdown Link road which is actually opposite the proposed to the Power Park and currently under used. This would alleviate any additional congestion on Long Lane near the junction with the B3184 and beyond.</p> <p>When the Airport returns to normal operations, flights and passenger numbers will increase, existing business's will continue to expand, there will not be the extra capacity needed in Long Lane for traffic travelling to and from the Power Park which would cause additional traffic congestion, noise and air pollution in the area if allowed.</p>	<p>There will be an increase in traffic to the site and an increase in queuing. The Council has put forward significant investment to improve Long Lane and make it suitable for heavy good vehicles and ensure two way traffic. The junction with the B3184 will need improvements in the future whether or not development of the site comes forward as it is anticipated at being over capacity by 2030. The pick up and drop off along Long Lane and the parking of passengers for the airport is a matter to be addressed by the highway authority and the airport.</p> <p>The drainage strategy is considered acceptable and the proposals are not considered to result in increased flooding to the area.</p> <p>The proposals are not considered to result in an unacceptable level of pollution.</p>
<p>Exeter Civic Society</p>	<p>As Exeter Civic Society we take an interest in developments surrounding Exeter which will affect Exeter residents through their design or impact on travel and facilities. This is just such a case.</p> <p>We welcome the additional employment which the development should result in.</p> <p>However, we have significant concerns about the arrangements for the additional traffic and the site's connectivity to Exeter and the surrounding area. We note the intention to encourage greater use of 'green' travel and to reduce the proportion of journeys by individuals in their cars. However, we consider that the Travel Assessment, Travel Plan and Design Code are not currently adequate in this respect and should be revised.</p> <p>1. The current roads, cycle ways and pavements should be further improved beyond the proposals in the Travel Assessment/Plan so cycling and walking (including from public transport) are made easier. Details are: The site itself may be accessible but more consideration needs to be given to the surrounding area which will significantly determine how people access the site. The B 3184 from Long Lane to the A30 does not have a footpath. The proposal to route pedestrians and cyclists through the airport car parks does not come close to meeting the aspirations of the Government's 2021 document Gear Change which requires a 3m dual way cycle track. Using the car parks creates a conflict with cars. The airport may also withdraw access rights which would effectively terminate the route. Action</p>	<p>The LDO seeks to support sustainable travel to the site where possible.</p> <p>The Silverdown link is to provide a safe cycle route as part of the Long Lane road improvements and will be bus gated to prevent other traffic passing through. This is not part of the LDO provision and instead sits within the Long Lane improvement scheme. The footpath along Long Lane is outside of the airport boundary and considered an acceptable standard by the Local Highway Authority. Whilst it would be desirable to have a footpath link to the A30 roundabout this is not considered a</p>

	<p>should be taken to install safe crossings across the B 3184 to and from the car parks and across the Clyst Honiton by-pass into Clyst Honiton itself.</p> <p>The Silverdown Office Park Road is used for car parking and has no pavement, making it unsafe for cyclists and pedestrians. It needs to be made safe. There is no pedestrian route to the west of the site to the bus stop at the airport except by walking across airport land. This access route needs to be made permanent and not subject to withdrawal by the airport. There needs to be greater clarity on who will fund the improved walking and cycling routes.</p> <p>2. The relatively poor public transport to the area should be improved so that it becomes a more attractive option. The bus routes cited only serve Exeter and Exmouth. Employees will come from a much wider area so the routes need to be expanded and connectivity widened. The existing routes could also be made more frequent and reliable.</p> <p>3. More ambitious targets such be set in the Travel Plan than the currently stated 'opportunity' of a 5% reduction in individual car journeys for which no evidence or comparative analysis has been provided. A 5% reduction over 5 years in the proportion of individual car journeys would still mean that the overwhelming majority of journeys were by this method and, indeed, given the likely increase in journeys resulting from the Power Park development the actual volume would increase. The Design Code states that employers will be 'encouraged' to have green travel plans. They should be required to have them and that they meet a certain standard. Expanding car sharing would be a way of reducing individual car journeys. This may be difficult for individual small employers but a site wide approach could make this easier.</p> <p>Finally we note that 20% of parking spaces will be for electric vehicles. This will help but many employees on lower wages will struggle to afford electric cars so simply expanding the number of spaces for them will not provide a 'green' answer outside of the need to improve connectivity for cyclists, pedestrians, public transport users and car sharers.</p>	<p>reasonable requirement for this development to provide.</p> <p>A Travel Plan Framework is included within the Planning Parameters Design Code and Condition 7 (Travel Plan) of the LDO requires a Travel Plan to be submitted and approved prior to any initial or subsequent occupation of any premises. The EZ has contributed to the provision of a bus route down Long Lane and around the Future Skills Centre. The travel Plans will need to reflect this and encourage use of public transport. There is also an e-bike stand at the Future Skills Centre.</p> <p>Electric vehicle car parking spaces, pedestrian and public transport and car sharing will all form part of sustainable transport methods implemented through the travel plans.</p>