

Exeter Local Plan

Examination

Matter 14: Infrastructure, Facilities and
Viability

Date at Examination: 14 May 2026

Devon County Council Position Statement

Statement Prepared: 22 April 2026

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1. Introduction

1.1. Purpose of this Statement

- 1.1.1. This statement has been prepared to answer the questions and address the associated issues as posed by the Planning Inspectors in relation to Matter 10 of the Exeter Local Plan (2022-2042) Examination.
- 1.1.2. This statement relates to Issue 1 questions 1, 2, 3, and 5, and Issue 3 question 4 of Matter 14 (Infrastructure, Facilities and Viability).
- 1.1.3. It should be noted that this statement does not cover all of the questions raised by the Planning Inspectors in relation to Matter 14, but focuses upon those where Devon County Council (DCC) has a specific interest in order to fulfil its statutory responsibilities, in this case regarding the County Council's role as Education Authority and Highway Authority.

2. Issue 1 Questions

2.1. Issue 1 Question 1

Is the Plan consistent with paragraph 20 of the Framework, which states that strategic policies should make sufficient provision for, amongst other things, new infrastructure including community facilities such as health and education?

- 2.1.1. DCC is content that the Infrastructure Delivery Plan (IDP) (EVB-IF-02a) recognises the changes requested by DCC as detailed in the agreed Statement of Common Ground (DTC-03b) and identifies the infrastructure requirements necessary to support the aims of the Local Plan and future development within the city. DCC requests that additional minor amendments are made to the IDP for accuracy, specifically to identify the Devon and Torbay County Combined Authority (DTCCA), alongside DCC, as a delivery partner for all transport projects. DCC and the DTCCA are currently jointly fulfilling the Local Transport Authority (LTA) role. From 1 April 2026, the LTA function has formally transferred to the DTCCA, with the Council operating within a transition period.

2.2. Issue 1 Question 2

How will primary and secondary education be provided for effectively? Will the allocation at Water Lane (SBA1) deliver a new primary school? Is Policy IF1 positively prepared, justified, effective and consistent with national policy, in particular paragraphs 20 and 22 of the Framework?

- 2.2.1. The Exeter Plan Evidence Base Report (0-25 Education) (EVB-IF-08) sets out the methodology and evidence used by Devon County Council to determine the education requirements of the Exeter Local Plan (2022–2042), as well as the strategy to deliver new education provision. The education requirements identified for additional primary and secondary infrastructure directly relate to the impact of the planned development on

education provision. This is consistent with National Planning Policy Framework paragraph 20 (c) which states the need to make sufficient provision for community facilities, which includes education.

- 2.2.2. New primary provision can be effectively delivered across Exeter over the plan period with up to two new primary schools, both to include nursery provision, and the expansion of an existing primary school. Ahead of the delivery of the new primary school at Water Lane, Devon County Council's strategy is the expansion of Monkerton Primary School to ensure sufficiency of primary school places in the shorter term. This approach acknowledges the wider site constraints at Water Lane and the likely timeframes for delivery of a serviced school site.
- 2.2.3. The new primary school on the Water Lane allocation will be planned to align with the development timescales. As set out in the Exeter Plan Evidence Base Report (0-25 Education) (EVB-IF-08), development at Water Lane as proposed in Policy SBA1 will be required to contribute towards education infrastructure, including the requirement for a new 2-form entry primary school and early years provision located within the Water Lane allocation. Whilst the Water Lane Supplementary Planning Document (EVB-S-01b) identifies an indicative broad location for the new school site, the land for the new school at Water Lane is not yet finalised. Suggested additional modifications SAMM99 and SAMM100 in the Schedule of suggested potential modifications (CSD-03) make clear reference to education being an essential community facility and that the new primary school will be central to the creation of community at Water Lane. In addition, suggested modification SMM93 provides assurance that the school land will be of a site area that complies with Department for Education's area guidelines for mainstream schools: Building Bulletin 103¹ (or any successor document).
- 2.2.4. The need for the second new primary school will be towards the end of the plan period and may need to be mitigated through an additional school site within the Exeter administrative boundary. Due to the lack of available land, a second school site has not yet been identified. However, the county council acknowledges that emerging plans to allocate sites directly adjacent to the city, but outside its administrative boundary, could provide a strategic solution to mitigate the impact of the Local Plan. In particular, the East Devon Local Plan Second Regulation 19 Publication Draft November 2025² includes Strategic Policy WS10 relating to 'Development next to the M5 and north of Topsham' (an extract showing Policy WS10 is contained in Appendix 1 of this statement). Policy WS10 safeguards 1.8 hectares of land for education purposes to provide the option for primary education infrastructure on site. This provides an option for additional school places through the delivery of a new primary school which could in part serve Exeter development given the location close to the boundary between authorities. Exeter Plan Policy TI1 includes wording for 'timely delivery and funding of infrastructure and facilities including primary education' and would

¹https://assets.publishing.service.gov.uk/media/5f23ec238fa8f57acac33720/BB103_Area_Guidelines_for_Mainstream_Schools.pdf

² Available at: [East Devon Local Plan Second Regulation 19 Version](#)

be supported by the proposed Topsham Infrastructure Delivery Framework (TIDF).

- 2.2.5. DCC supports suggested additional modification SAMM100 which specifies that an ongoing review of education provision will be undertaken alongside a future review of the Exeter Local Plan and indicates how development in advance of a new primary school site being provided will be considered when determining relevant planning applications.
- 2.2.6. New secondary school places can be effectively delivered through the expansion of existing provision. The county council has reviewed expansion options at existing secondary schools with Academy/School partners. The expectation is that the need for additional secondary provision within the Local Plan can be mitigated at existing provision without the allocation of a new secondary school site.
- 2.2.7. Support for DCC's requests for Section 106 developer contributions (as referenced in paragraph 15.24 of the Exeter Plan) and the early identification of education infrastructure requirements will assist the county council in delivering a sustainable pattern of sufficient education provision in Exeter to meet its statutory duty.

2.3. Issue 1 Question 3

Are the assumptions regarding infrastructure projects, delivery mechanisms and funding sources outlined in the table within the Infrastructure Delivery Plan (IDP) still broadly accurate? What implications, if any, does the latest evidence in the IDP have on the viability of development and the ability to deliver it?

- 2.3.1. DCC has reviewed the latest Infrastructure Delivery Plan (IDP) (EVB-IF-01a) and is satisfied that the infrastructure required to support the proposed development is appropriately identified. It provides a proportionate evidence base to inform infrastructure planning and delivery. While the county council does not undertake overall development viability assessments, it is mindful of development viability when identifying infrastructure requirements.

2.4. Issue 1 Question 5

In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 2.4.1. DCC considers that suggested modification SMM93 is necessary for soundness in order to ensure that the site area of the school land complies with government guidance and that contributions will ensure that development will be appropriately mitigated. It will allow delivery of the first new primary school which is required to support development proposed at Water Lane. DCC also supports suggested additional modifications SAMM99 and SAMM100 which will assist with effective delivery of the

education infrastructure needed to support development within the local plan.

3. Issue 3 Questions

3.1. Issue 3 Question 4

In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 3.1.1. DCC supports SMM86 which includes the addition of ongoing involvement of relevant infrastructure organisations in development proposals affecting community facilities. This will ensure that the county council remains engaged when planning for education provision.
- 3.1.2. As stated in the response to Issue 1 Question 5 above, DCC also supports suggested additional modifications SAMM99 and SAMM100 which will assist with effective delivery of the education infrastructure needed to support development within the local plan.