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Via email: Robert.L.Young@exeter.gov.uk

Dear Mr Young

Exeter Plan examination - Written statement of National Highways

Matter 10 Transport, Travel and Communications

National Highways is the Strategic Highway Authority, responsible for operating, maintaining and improving the Strategic Road Network (SRN) and has an interest in the potential impact of planned growth at Exeter on the M5 particularly junctions 29, 30 and 31 and junctions on the A38 and A30.

This statement builds on previous submissions to the Local Plan process and Statement of Common Ground between Exeter City Council and National Highways.

Matter 10 Transport, Travel and Communications.

Q1. Has the preparation of the Local Plan been consistent with paragraph 108 of the Framework, which states that transport issues should be considered at the earliest stages of plan making

The September 2021 Issues consultation document set out a vision to invest in sustainable transport and locate development to maximise sustainable travel. We consider that this vision has informed the subsequent identification of site allocations and supporting infrastructure, and has informed the publication draft Local Plan. In parallel, transport issues have been further considered as part of the Greater Exeter Transport Study led by Devon County Council. Exeter City Council has been a partner to this work, alongside neighbouring Local Authorities and National Highways.

Q2. How has the Greater Exeter Transport Study and other key transport policy documents such as the Local Transport Plan and Exeter Transport Strategy been considered in the preparation of the Local Plan?

National Highways consider that the vision and objectives of the Local Plan are broadly consistent with key transport policy documents including the Local Transport Plan and Exeter Transport Strategy. We do not see any clear contradictions between the prevailing local transport policy ambitions and the Local Plan proposals.

The Greater Exeter Transport Study has been prepared in parallel to the Local Plan, and the emerging findings of the study have informed the Infrastructure Delivery Plan. The study has drawn on transport modelling undertaken by both Devon County Council and National Highways to inform the identification of infrastructure and service proposals. The work draws on existing measures within the Local Transport Plan and Exeter Transport Strategy, alongside new measures identified in response to proposed allocations and evidenced transport issues.

Matter 10: Issue 2 – Transport Infrastructure, Motorways and Digital Communications

Q1. Where strategic highway improvements have been identified as necessary what amount of development can come forward in advance of their implementation? How has this been considered in the Council's Housing Trajectory?

For clarity, NH is principally interested in the SRN as defined by Circ 01/22. Specifically the M5 and A30 in this area.

The 2025 Infrastructure Delivery Plan (EVB-IF-02a) identifies a requirement for improvements at the A30 Ide roundabout and corridor improvements along the adjoining A377, including widening of the A377 between Ide roundabout and Church Road. The A30 trunk road forms part of the SRN, whilst the A377 forms part of the local highway network managed by Devon County Council. Improvements to the A377 are intended to relieve queuing back to the A30.

The proposals are linked to wider sub-regional development, and measures were specifically assessed in connection with the Teignbridge Local Plan and Markham Village allocation. Policy EE1 of the Teignbridge Local Plan (Main Modifications Consultation, November 2024) requires the delivery of mitigation to avoid unacceptable impacts and advises that trigger points will be inserted into planning obligations to ensure infrastructure is delivered in a timely manner.

Separately, the IDP includes the following transport improvements which may be relevant to the future operation of the strategic highway network (M5 and A30/A38 trunk roads):

- A package of strategic, multi-modal transport measures relating to background growth and development across the sub-region. To be confirmed from the emerging Greater Exeter Transport Study.

- A series of Park and change/mobility hubs for key corridors into the city and key development sites, including: A30/Honiton road, A376/A3052/Sidmouth Road, Pinhoe Road, Cowley Bridge Road, West Exeter/Alphington Road, Bridge Road/Matford and strategic brownfield allocations.
- Service enhancements on the rail network to achieve 30 minute frequencies as per the Devon Metro project.
- A package of multi-modal transport measures relating to development in the Topsham area (development in both Exeter and emerging East Devon allocation at Land North of Topsham): Active travel, bus services, mobility hub, local traffic management, active travel crossings of railway and M5, potential road between Sandy Park and Old Rydon Lane.

We are not aware that specific trigger points have been identified to limit development ahead of delivery of the infrastructure identified above. We note that improvements within the IDP have been classified and an estimated delivery period indicated. We are also supportive of Strategic Policy IF1 (Delivery of Infrastructure) which requires the delivery of supporting infrastructure at the earliest practical and viable opportunity. However, for the avoidance of doubt, National Highways has not requested trigger points for specific improvement schemes in respect of Exeter's planned growth.

Improvements identified as part of the Greater Exeter Transport Study are intended to address cumulative growth ambitions, and National Highways is working with the relevant Local Planning Authorities to ensure delivery. East Devon Council proposals for a strategic development known as Marcombe to the east of the M5 are key in bringing forward requirements for SRN improvements, and Devon County Council is leading further work to identify necessary mitigation. This matter is being explored in advance of examination of the East Devon Local Plan.

Q2. No comment.

Q3. No comment.

Q4. What impact would the development of a new Motorway Service Area as supported by Policy STC8 have on junction 30 of the M5? What effect will the new service area have on the safe and efficient operation of the highway network?

The development of a new Motorway Service Area (MSA) and redevelopment of the existing site for employment use (as supported by Policy STC8) has not informed traffic modelling work to date undertaken by either Devon County Council or National Highways. The identification of a suitable new Services site would be subject to a separate approvals process, and further guidance on the provision of roadside facilities (including the maximum distance between facilities) is set out in the DfT Circular 01/2022. National Highways has advised that any proposal for a new Services would need to be supported by a full traffic assessment at a future point in time to demonstrate any additional impacts and associated infrastructure needs.

National Highways undertook a traffic survey of the existing MSA access roundabout in November 2022. The survey recorded the number of vehicles entering and exiting the Services site and therefore gives an indication of the scale of traffic demand that could be displaced by any redevelopment of the site. In the traditional morning commuter peak hour of 8-9am the Services site attracted approximately 550 vehicle movements (combined arrivals and departures). In the traditional evening commuter peak hour of 5-6pm the MSA site generated approximately 500 vehicle movements (combined arrivals and departures). Around 75% of these vehicle movements also passed through M5 J30 roundabout.

It cannot be assumed that all these movements would be displaced by the development of a new MSA, as some of this traffic is likely to continue to pass through M5 J30 for access to/from Exeter. However, it is likely that some traffic would be displaced and would remain on the M5 mainline carriageway before accessing an alternative MSA location, subject to the identification of a suitable alternative site. Noting the surveyed traffic movements referred to above, it is therefore possible that an employment use would not intensify traffic demand via M5 Junction 30, or would not lead to a significant intensification. However, this would need to be confirmed in due course through additional surveying and assessment work.

Through our Statement of Common Ground with Exeter City Council, we have recommended that a suitable replacement MSA would need to be open to traffic prior to any redevelopment of the existing site. This is important to maintain rest and service facilities for passing vehicles on the M5. The Authority have agreed to the inclusion of additional supporting text to clarify this requirement.

Q5. No comment.

Q6. Are the requirements set out in policies STC7, STC8 and STC9 justified consistent with national planning policy and based on robust up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Policy STC7 does not currently include safeguarded sites, routes and structures of direct relevance to the SRN, although we acknowledge that the retained or future transport infrastructure will be important to support delivery of the Council's vision and plan objectives, notably in respect of maximising sustainable transport. However, it has been agreed through a Statement of Common Ground between National Highways and Exeter City Council that the potential need to widen the A377 Alphington Road to ease queuing back to the A30 Trunk Road should be included in the list of safeguarded sites, routes, and structures. The need for corridor improvements is recognised in Exeter's 2025 Infrastructure Delivery Plan (EVB-IF-02a) which identifies the improvements as being linked to wider sub-regional development.

The option of widening the A377 was explored in traffic modelling work undertaken by Devon County Council in connection with the Teignbridge Local Plan, which underwent examination in 2025. The findings of the work have informed policy commitments with the Teignbridge Local Plan, which requires mitigation to prevent unacceptable impacts taking account of cumulative growth. National Highways has not received information to demonstrate the deliverability of the A377 widening, although the Teignbridge Local Plan does not specifically commit to carriageway widening (although this was one potential option under consideration).

Exeter City Council's support for the principle of redeveloping the Services adjacent to M5 J30 under Policy STC8 is noted by National Highways. As advised in our response to the Regulation 19 consultation, the potential redevelopment of the Services site for employment use has not informed ongoing traffic modelling work. The proposal would therefore need to be supported by a full traffic assessment at a future point in time, to demonstrate any additional impacts and associated infrastructure needs not previously accounted for as part of the Greater Exeter Transport Strategy. Whilst not a matter for National Highways, we anticipate that the City Council has explored the merits of redeveloping the Services site for employment. However, we have not been consulted on any work to review the availability of suitable alternative sites to replace the existing Services. We would not therefore conclude that there is up-to-date evidence to demonstrate that the proposal is deliverable.

National Highways support the City Council's commitment to enable a step-change in digital communications and associated requirements under Policy STC9, given the potentially beneficial impacts on reducing the need to travel. However, the viability and deliverability of these requirements is not a matter which National Highways would comment on.

Q7. No comment.

Q8. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Through our Statement of Common Ground with Exeter City Council, we have recommended that a suitable replacement MSA would need to be open to traffic prior to any redevelopment of the existing site. This is important to maintain rest and service facilities for passing vehicles on the M5, subject to the assessment of roadside facilities in line with DfT Circular 01/2022. The Authority have agreed to the inclusion of additional supporting text to clarify this requirement. However, given the policy already refers to the provision of an appropriate replacement facility, we do not consider this requirement to be necessary for soundness.

I trust that our response is helpful and assists with the Inspectors' deliberations. If you require further clarification or wish to discuss any of the above, please do not hesitate to contact me.

Yours sincerely,

Steve Havers
South West Operations - Planning & Development