

Climate Change, Environment and Transport

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6 February 2025

Dear Sir/ Madam,

RE: Consultation on The Exeter Plan. Publication Plan: Regulation 19

Thank you for the opportunity to comment on The Exeter Plan.

Overall, Devon County Council views the plan to be sound, legally compliant and to comply with the duty to cooperate. The county council continues to be broadly supportive of the emerging Exeter Plan: Publication Plan. The county council has been in ongoing discussions with Exeter City Council with regard to strategic issues relating to infrastructure provision, transport, education, children's and adult services, mineral and waste planning, economy, flood risk, historic environment, public health and community facilities. This positive and proactive approach has addressed a number of issues prior to reaching this stage of the plan.

The county council does however have a number of detailed comments to make on strategic issues relating to education, adult social care and gypsy and traveller provision and these comments regarding the specific policies, paragraphs and site options are shown in the table in Appendix 1 below. Linked to these comments, we also would like to make comments on the December 2024 version of the Infrastructure Delivery Plan which forms part of the evidence base. These comments are shown in the table in Appendix 2 below.

Infrastructure Provision

Devon County Council considers it essential that infrastructure necessary to support the development proposed in the Local Plan is provided in an appropriately phased and timely manner. It is also essential that appropriate funding mechanisms to deliver this infrastructure are in place, in particular to ensure necessary education, transport and community infrastructure is provided. We look forward to continuing our work with Exeter City Council on the Infrastructure Delivery Plan.

Highways and Transport (including public transport)

Over the course of the plan process, Devon County Council has been in broad agreement with the content of the transport element of the plan and ongoing discussions have led to changes enabling further alignment with the county council's vision.

Overall, Devon County Council supports Exeter City Council's vision for sustainable transport, aiming to minimise car use while promoting active travel and public transport. This aligns with several of Devon County Council's strategies, including the emerging Local Transport Plan 4. Our goal is to provide an integrated, accessible transport system where walking, cycling, and public transport are the most attractive forms of local travel, enabling at least 50% of Exeter trips to be wheeled, walked, or cycled to work or education by 2040.

A key aspiration of the county council is to maximise the opportunities in development planning to utilise road space effectively, bringing about broader improvements in sustainable mobility and placemaking and providing opportunities to contribute towards the delivery of the Local Cycling and Walking Infrastructure Plan (LCWIP) routes. We consider that the Exeter Plan appropriately supports and links to Exeter's LCWIP strategy.

Local Education Provision (including early years)

The county council has a statutory duty to ensure that there is sufficient school and early years places for pupils across the county, including ensuring that the impacts of development are mitigated through existing or new school place provision.

Overall we support the city council's commitment in paragraph 15.24 to supporting the principle of development providing early years, primary, secondary and provision for children with Special Educational Needs and Disabilities (SEND) through Section 106 Agreement contributions as may be required and in line with the County Council's Education Infrastructure Plan and Education Infrastructure s106 Approach and the Department for Education Guidance on Securing Developer Contributions for Education.

Specific comments relating to education provision are outlined in Appendix 1.

An additional 1,000 primary school places will be required through the delivery of two new primary schools and expansion of an existing school. All new primary provision will include early years provision. Whilst Policy SBA1 specifies provision of a two form entry school at Water Lane, Devon County Council requests that a site of at least 1.6ha is allocated for this purpose. We acknowledge that the need for the remaining primary school places would be towards the end of the plan period and consider a second new primary school is required through the allocation of an additional school site within the Exeter administrative boundary. As a site has not yet been identified, DCC requests that wording is added within the plan stating a second new primary school is required over the plan period. DCC also recognises that there are emerging plans to allocate sites directly adjacent to the city, but outside its administrative boundary, which could provide a strategic solution to partially mitigate the impact of the Local Plan. We note that this is reflected in Policy TI1 of this plan.

If the Local Plan is unable to allocate a site for a second new primary school, the county council may require conditions to be placed on the delivery of houses until such time that a solution is found or a future review of the need suggests that this site may not be required. Without this, it may not be possible to mitigate the education impact of development.

In regards to secondary provision, an additional 1,200 places will be required over the plan period. Our expectation is that the needs of the Local Plan can be mitigated

through the expansion of existing secondary schools and without the allocation of a new secondary school site.

Regarding Special Education Needs, DCC will be seeking financial contributions towards provision within and outside the city rather than allocation/ delivery of a new SEND school within the Exeter Local Plan, recognising that Special Schools serve a much wider geographical area.

Paragraph 15.24 is noted and welcomed with regards to funding of educational infrastructure provision.

Adult Social Care

The inclusion of extra care housing and affordable specialist provision is imperative within the Plan policies. Therefore, we support Policy H8 'Homes for older people' and Policy H9 'Supported housing'.

As Marsh Barton is no longer proposed as a strategic site allocation, only one out of the two required extra care housing schemes remains identified within the Publication Plan site allocation policies (Water Lane Strategic Policy SBA1). Without another identified extra care housing scheme, there is uncertainty over whether sufficient extra care housing provision can be delivered in Exeter. Therefore, we consider that there is still a need to identify extra care housing provision within another site allocation. As stated in Appendix 1, we recommend that allocation SBA2 – East Gate is the most suitable site allocation due to its size and proximity to facilities as supported by Policy H8 but also recognise that alternative locations may come forward which can meet the criteria of Policy H8.

Gypsy and Traveller Provision

It is the role of the Local Planning Authority to plan to meet the needs of Gypsy, Traveller, and Travelling Showpeople communities across Exeter. The county council has some concerns regarding the absence of allocated Gypsy and Traveller provision within the Plan, particularly when considering under delivery in previous plan cycles within Exeter.

Due to a lack of development sites coming forward, the Plan does not seek to allocate any sites for Gypsy and Traveller provision and instead will rely on these sites coming forward as windfall sites. The county council has concerns regarding the likelihood of windfall sites for this Gypsy and Traveller provision coming forward without allocation and encourages Exeter City Council to reassess whether there are any appropriate sites within the city or any proposed allocations which could include this provision. Should a site not be identified for allocation for the required pitches as identified through the assessment, we consider it unlikely that there will be any provision made within this plan cycle.

Whilst it is understood that the Plan is being examined under transitional arrangements and therefore the December 2023 Version of the NPPF applies, it should be noted that the Gypsy and Traveller definition has been changed in the most recent version of the Government's Planning policy for traveller sites (PPTS) (12 December 2024) resulting in what has previously been defined as non-PPTS need now being included within the definition. This, in addition to provisions made within the new NPPF for the use of Greenbelt land for Gypsy and Traveller provision,

demonstrates the direction of travel with regard to ensuring the delivery of Gypsy and Traveller provision in the future and the increased emphasis on the need for delivery of pitches.

Devon County Council has had discussions with TravellerSpace who will be responding to this consultation by way of technical challenge to the methodology used in the needs assessment. The county council is supportive of this challenge and recognises the importance of ensuring a robust assessment has been undertaken.

Other areas of consideration

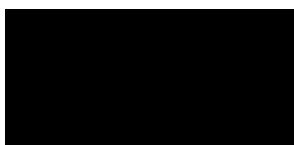
Devon County Council has been involved in detailed discussions with Exeter City Council during each stage of the plan process and has been fully engaged in communicating our needs and views in the following issues relating to the county council's functions:

- Infrastructure provision;
- Children's and adult services;
- Flood risk;
- Minerals and waste;
- Economy;
- Historic environment; and
- Public health.

It is considered that matters relating to the above issues have been addressed and the county council has no further comments to make.

We trust these comments are useful and we look forward to continuing our work with you as you progress your local plan. If you have any queries, please do not hesitate in contacting me.

Yours sincerely,



Sarah Ratnage
Planning Manager

Appendix 1 – DCC Regulation 19 consultation comments on the Exeter Plan

DCC Issue	Paragraph/Policy/Site Reference	DCC Comments
Adult Social Care	Paragraph 6.46 (Page 46) Homes for older people	We request that this paragraph 6.46 identifies extra care housing as an example of a 'relevant, specialist home' type in order to recognise the importance of location for these specific users. We request that the wording in bold is added: "Where relevant, specialist homes for older people, such as extra care housing , should be located within easy walking distance (ideally no more than 400 metres) of local shops, services and facilities, including a bus stop or train station."
Adult Social Care	Paragraph 6.48 (Page.46) Homes for older people	The paragraph refers to "annex 8" of the Government's Supported Housing: National Statement of Expectations. We consider that this reference is incorrect and should refer to " Annex A " instead.
Adult Social Care	Paragraph 6.52 (Page.47) Supported Housing	The paragraph refers to "annex 8" of the Government's Supported Housing: National Statement of Expectations. We consider that this reference is incorrect and should refer to " Annex A " instead.
Gypsy and Traveller accommodation	Paragraph 6.65 (Page 50) Gypsy and Traveller accommodation	This paragraph states that "Policy H11 aims to facilitate the provision of accommodation for Gypsies, Travellers and Travelling Showpeople..." but we would question the level of certainty provided in relying on windfall sites coming forward to provide this accommodation.
Gypsy and Traveller accommodation	Policy H11: Gypsy and Traveller accommodation (Page 51)	Due to a lack of development sites coming forward, the Plan does not seek to allocate any sites for Gypsy and Traveller provision and instead will rely on these sites coming forward as windfall sites. The county council has concerns regarding the likelihood of windfall sites for this Gypsy and Traveller provision coming forward without allocation and encourages the city council to reassess whether there are any appropriate sites within the city or any proposed allocations which could include this provision.
Education	Paragraph 15.24 (Page 128) Community facilities	Paragraph 15.24 states that "Education is a particularly important form of community facility." DCC requests that paragraph 15.24 includes the additional wording shown in bold below to recognise the essential role educational infrastructure plays within the community: "Education is an essential form of community facility."

Education	Paragraph 15.24 (Page 128) Community facilities	We welcome the wording within paragraph 15.24 which ensures that the required education infrastructure as a result of development is funded with S106 contributions (rather than through CIL).
Education	Paragraph 15.25 (Page 128) Community facilities	An additional 1,000 primary school places will be required through the delivery of two new primary schools and expansion of an existing school. DCC supports provision of a two form entry school at Water Lane. Whilst the second new primary school will be required to meet projected need towards the end of the plan period, no site has been allocated within the administrative boundary of Exeter. DCC requests that paragraph 15.25 includes the additional wording shown in bold below to recognise the potential issue related the lack of an allocated site for a second primary school, accord with Government guidance on school design (currently Building Bulletin 103) and identify how development should be considered prior to a site being identified: “Additional early years, primary, secondary and special education provision will be required during the plan period, including a new primary school at Water Lane on a site of at least 1.6ha. A second additional primary school on a site of at least 1.6ha is also likely to be required to meet the remaining projected need for primary school places towards the end of the plan period. It should be noted that a site has not been allocated as no suitable/ acceptable sites have been identified within the administrative boundary of Exeter. Should any development come forward, prior to a new primary site being identified but at such a time in the plan period where the additional places are required, this shortfall in school places will be taken into consideration when determining any relevant planning application. The City Council will work with Devon County Council on delivering suitable education provision.” If Exeter City Council is not able to commit to a second primary school site and/or one has not come forward when required, DCC may potentially need to request the use of Grampian conditions should there be insufficient primary school places at the time of any proposal, to ensure that sufficient school places are provided to facilitate housing development as it comes forward.

Adult Social Care	Policy SBA1 - Water Lane A. iv. (Page 138)	The pending application 23/1007/OUT at the Water Lane site, proposing between 900-980 homes, does not identify any Extra Care Housing provision. As a result there is uncertainty about whether the necessary extra care housing will be delivered at Water Lane with the remaining land yet to come forward and the requirement of Policy SBA1 being met. We have made further comments associated with this issue about the East Gate policy below.
Education	Policy SBA1 – Water Lane C. vii. (Page 139)	Further to our comments above relating to paragraph 15.25 we request that additional wording, as shown in bold below, is added to part C. vii to ensure that the policy allocates a school site large enough to comply with current Government guidance (Building Bulletin 103): “vii. A 2 form entry primary school including early years and communal space for a family hub on a site of at least 1.6 ha and contributions to secondary and special educational needs provision”
Adult Social Care	Policy SBA2 - East Gate (Page 141)	As Marsh Barton has since been removed as a site allocation, only one out of the two required extra care housing schemes remains identified within the Publication Plan site allocation policies (Water Lane Strategic Policy SBA1). Without another identified extra care housing scheme, there is uncertainty over whether sufficient extra care housing provision can be delivered in Exeter and we think that there is still a need to identify extra care housing provision within another site allocation. We consider that the East Gate allocation represents a suitable site for Extra Care Housing due to its size and proximity to facilities which is supported by Policy H8 but recognise this may not necessarily be the preferred option for the site owners. We would however continue to encourage alternative sites being investigated which meet the requirements of Policy H8: Homes for older people and in particular H8.b where the proposal is “...well connected to local shops, services and community and support facilities, including health facilities and public transport;”
Education	Paragraphs 16.34 and 16.35 (Page 153) Topsham Infrastructure	Paragraph 16.34 refers to the expected East Devon Local Plan allocation of an adjacent primary school site that could also serve Exeter children. Devon County Council seeks a primary school site within the Exeter boundary and allocated in the Exeter Local Plan in preference to reliance on provision within a neighbouring Local Plan to provide certainty

		of its delivery. The emerging East Devon Local Plan Regulation 19 consultation is due to commence in February 2025, but examination and adoption are likely to be later than for the Exeter Plan. It is therefore afforded some degree of planning weight but lacks certainty at this stage when considering educational place provision in Exeter. Should Exeter City Council not be able to commit to a second primary school site and/or one has not come forward when required, DCC may potentially need to request that Grampian planning conditions are utilised should there be insufficient primary school places at the time of determining relevant planning applications.
Education	Policy T11 A (Page 153) Topsham Infrastructure Delivery Framework	The wording within this policy needs to include reference (as it has with other policy allocations) to specify “ Contributions to early years, primary, secondary and special educational needs provision. ” At present it only refers to primary education.

Appendix 2 – DCC Regulation 19 consultation comments on the Exeter IDP Version 2 December 2024

Project name and brief description	Infrastructure theme	Classification (related to development)	Estimated project cost	Delivery partners	Potential funding sources (detail TBC). Funding could also include scheme development	Estimated delivery period	DCC Regulation 19 consultation comments provided January 2025
Habitat Regulations Assessment mitigation (Suitable Alternative Natural Greenspace provision and SAMM) delivered through updated South East Devon Habitat Mitigation Strategy	Green infrastructure	A. Critical	TBC	ECC, TDC, EDDC, DCC, Natural England, Environment Agency, developers	S106 / CIL, on-site provision	2021-2041	
A379 Exeter outer ring road project: Highway and structures improvements including series of River Exe bridges	Transport - Highways	D. Strategic	£31,000,000	ECC, DCC, National Highways, LTB, DfT	DCC/LTP, LTB, DfT	2026-2036	
New rail station at Monkerton/Hill Barton	Transport - Public transport	B. Important	£15,000,000	ECC, DCC, Network Rail, train operating company, developers	S106, DCC/LTP, Network Rail	2026-2041	
Service enhancements on the rail network to achieve 30 minute frequencies as per the Devon Metro project, including 15 minute frequency between St Davids and Digby and Sowton.	Transport - Public transport	B. Important	£50,000,000	ECC, DCC, Network Rail, train operating company	S106, DCC/LTP, Network Rail, train operating company	2026-2041	
Access improvements to rail stations in Exeter, including St Thomas, St James Park and Polsloe Bridge	Transport - Public transport	C. Desirable	£10,000,000	ECC, DCC, Network Rail	S106, DCC/LTP, Network Rail, DfT	2026-2041	

Improved bus services and zero emission vehicles to serve development sites and key residential and employment sites	Transport - Public transport	B. Important	£5,000,000	ECC, DCC, bus companies, DfT, developers	S106, DCC/LTP, bus companies	2026-2041	
A series of Park and Change Ride 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	Transport - Public transport	B. Important	£15,000,000	ECC, DCC, EDDC, TDC, bus companies, DfT, developers	CIL / S106, DCC/LTP, development in other LA areas, bus companies, DfT	2026-2036	Wording change (Column 1): DCC requests that this project description is amended to refer to Park and Change to reflect the evolving nature of park and ride facilities which now facilitate other methods of sustainable onward travel.
A new shared mobility scheme/schemes providing car share and e-bike hire	Transport - shared mobility	B. Important C. Desirable	TBC	ECC, DCC, provider, developers	CIL / S106, DCC/LTP, DfT	2026-2041	Classification amendment (Column 3): We welcome the inclusion of this scheme in the IDP but recognise that it is currently an aspirational scheme and as result recommend amending the classification from B. Important to C. Desirable.
Improved city coach interchange facilities	Transport - Highways	D. Strategic	£200,000	ECC, DCC, bus companies, DfT	CIL / S106, DCC/LTP, bus companies, DfT	2026-2041	
Bus Service Improvement Plan central corridor (Heavitree Road) enhancement project	Transport - Public transport	B. Important	£1,000,000	ECC, DCC, Stagecoach, developers	S106, DCC/LTP, bus companies, DfT	2021-2026	
Bus Service Improvement Plan Western Corridor (Cowick Street) enhancement project. Complete	Transport - Public transport	B. Important	£0	ECC, DCC, Stagecoach	N/A	Complete	
Bus Service Improvement Plan central/ New North Road corridor enhancement project. Complete	Transport - Public transport	B. Important	£0	ECC, DCC, Stagecoach	N/A	Complete	

Bus Service Improvement Plan eastern Corridor (Pinhoe Road to City centre) Bus Lane and Signals upgrade	Transport - Public transport	B. Important	£560,000.00	ECC, DCC, Stagecoach, developers	S106, DCC/LTP, bus companies, DfT	2021-2026	
Bus services: Water Lane	Transport - Public transport	B. Important	TBC	ECC, DCC, Stagecoach, developers	S106, DCC/LTP, bus companies, DfT	2026-2036	
Strategic long distance trails (beyond Exeter): Staged delivery of Clyst Valley Trail, Boniface Trail, Exe Estuary Trail, Cranbrook to Mosshayne (East Devon) walking and cycling route and exploring the creation of green lanes on the edge of Exeter.	Transport - Active travel	D. Strategic	£40,000,000	ECC, DCC, EDDC, TDC, MDDC, Active Travel England	DCC/LTP, Active Travel England, DfT	2026-2041	Additional wording (Column 1): Devon County Council requests that the additional wording highlighted in bold in Column 1 is included to clarify that Cranbrook to Mosshayne is a walking and cycling route and recognise the role of green lanes as referred to in the LTP4, Exeter Transport Strategy and LCWIP.
Exeter Local Cycling and Walking Infrastructure Plan: Top ten ranking schemes: E9, E3, E1, E15, E6, E14 (including replacement Mallison Bridge), E4, E7, E12, E20 (E3, E4, E9, E12 – prioritised by DCC in first five years of LCWIP) Exeter Local Cycling and Walking Infrastructure Plan: Initial 5 Year Plan Routes (E3, E4, E6, E9, E12) Mallison bridge	Transport - Active travel	B. Important	£30,775,000 £20,000,000	ECC, DCC, Active Travel England, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2036	New wording (Column 1): Devon County Council requests the wording is changed to that shown in bold in Column 1 to reflect/ be consistent with LTP4 ranking and LCWIP prioritisation. Cost change (Column 4): We request the cost is changed to align with the proposed changes in Column 1.
Exeter Local Cycling and Walking Infrastructure Plan: Other routes linking to allocations: E13, E18, E19, E21, E22 Exeter Local Cycling and Walking Infrastructure Plan: Improvements	Transport - Active travel	B. Important	£7,200,000 £10,000,000	ECC, DCC, Active Travel England, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2036	New wording (Column 1): We request the wording is changed to reflect/ be consistent with LTP4 ranking and LCWIP prioritisation. Cost change (Column 4):

to existing routes (E1, E10, E16, E17)							Request the cost is changed to align with the proposed changes in Column 1.
Exeter Local Cycling and Walking Infrastructure Plan: Remaining schemes: E5, E8, E10, E16, E17 Exeter Local Cycling and Walking Infrastructure Plan: Proposed new cycling routes between key residential, employment and leisure destinations across the city (E5, E7, E8, E13, E14, E15, E18, E19, E20, E21, E22)	Transport - Active travel	C. Desirable	£16,150,000 £24,000,000	ECC, DCC, EDDC, Active Travel England, developers	S106 / CIL, DCC/LTP, Active Travel England	2031-2041	New wording (Column 1): We request the wording is changed to reflect/ be consistent with LTP4 ranking and LCWIP prioritisation. Cost change (Column 4): Request the cost is changed to align with the proposed changes in Column 1.
Exeter Local Cycling and Walking Infrastructure Plan: 5 proposed walking routes to improve the safety, ease and attractiveness of walking within and across Exeter city centre: Routes W1 (including replacement Mallison Bridge), W2, W3, W4 and W5	Transport - Active travel	B. Important	£5,000,000	ECC, DCC, Active Travel England, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2036	
Water Lane active travel package as referred to in the adopted Water Lane SPD	Transport - Active travel	B. Important	TBC	ECC, DCC, Active Travel England, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2031	New wording (Column 1): Devon County Council requests the wording is changed to that shown in bold in Column 1 to provide clarity on what the term 'active travel package' is referring to.
Tan Lane railway arch: Bus and pedestrian and cycle access related to Water Lane	Transport - Active travel	B. Important	£500,000	ECC, DCC, Active Travel England, DfT, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2031	
Water Lane railway line underbridge improvement for active travel related to Water Lane	Transport - Active travel	B. Important	£100,000	ECC, DCC, Active Travel England, DfT, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2036	

Additional pedestrian and cycle bridge over the canal linking Water Lane and Riverside Valley Park. Potential for this to be considered as part of the emergency access and egress scheme for Water Lane - TBC	Transport - Active travel	B. Important	TBC £5,000,000	ECC, DCC, Active Travel England, DfT, developers	S106 / CIL, DCC/LTP, Active Travel England, EA (if considered part of emergency access/egress route)	2026-2036	Cost change (Column 4): The estimated cost is likely to be circa £5,000,000 and as such we would request this is included within Column 4 'Estimated Project Cost'.
Pedestrian cycle access between Newbury car breakers site and roundabout	Transport - Active travel	A. Critical	TBC	ECC, DCC, developers	S106	2026-2031	
A series of pedestrian and cycle crossings of Improved cycle and pedestrian crossings on Western Way, radial routes and key junctions including former Exeter bypass, Exe Bridges, Paris Street roundabout, and Sidwell Street/Blackboy Road roundabout.	Transport - Active travel	B. Important	£2,000,000	ECC, DCC, Active Travel England, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2041	Amended wording (Column 1): We request that the wording in Column 1 is amended to that highlighted in bold to better reflect the nature of any works which may include both improving existing infrastructure and/ or creating new infrastructure where identified.
Local highway enhancements on A377 and level crossing at St David's	Transport - Highways	D. Strategic	£2,000,000	ECC, DCC, Network Rail, developers	S106, DCC/LTP, Network Rail	2021-2036	
Local highway enhancements at junctions with A377 related to Water Lane proposals: Including Haven Road/A377 and Willeys Avenue/A377	Transport - Highways	A. Critical	£1,000,000	ECC, DCC, developers	S106	2026-2031	
South Gate highways reconfiguration including public realm improvements	Transport - Highways	A. Critical	£4,000,000	ECC, DCC, developers	S106 / CIL, DCC/LTP, on-site provision	2026-2036	
East Gate pedestrian and public realm improvements including additional crossing of Cheeke Street	Transport - Active travel	B. Important	£500,000	ECC, DCC, developers	S106 / CIL, DCC/LTP, Active Travel England	2026-2036	Amended wording (Column 1): Devon County Council requests that the reference to Cheeke Street is removed so that specific improvements are

							identified and agreed at a later date.
Ide roundabout junction improvements/corridor improvements: Linked to wider sub-regional development	Transport - Highways	D. Strategic	TBC	ECC, DCC, Teignbridge District Council, developers	S106, DCC/LTP, development in other LA areas, DfT	2026-2041	
Public realm improvement scheme at Exeter St David's Station forecourt. Strategic function linked to Red Cow allocation	Public realm	A. Critical	£1,000,000	ECC, DCC, Network Rail, developers	S106 / CIL, DCC, on-site provision	2026-2036	
South Street public realm enhancement project	Public realm	C. Desirable	£15,000,000 TBC	ECC, DCC	S106 / CIL, DCC, DfT, Active Travel England	2026-2041	Cost change (Column 4): Given we have do not have sufficient detail on the plans for this area we would request that costing is marked as TBC.
City centre public realm enhancements: South Street/ Market Street; Western Way; Paris Street, Sidwell Steet, Summerland Street, Barnfield Road	Public realm	C. Desirable	£2,000,000	ECC, DCC, developers	S106 / CIL, DCC, DfT, Active Travel England	2026-2041	
Public realm, open space and interpretation provision around the medieval bridge and city walls	Public realm	C. Desirable	TBC	ECC, Historic England, developers	S106 / CIL, Historic England	2026-2041	
Sport England Local Delivery Pilot transport infrastructure (including Newtown)	Transport - Active travel	C. Desirable	£400,000	ECC, DCC, developers	S106 / CIL, Sport England	2021-2031	
Electricity generation and EV charging at Park and Ride/Change sites and delivery of on street electric vehicle charging facilities - related to Devon Electric Vehicle Charging Strategy	Transport - Highways	D. Strategic	TBC	ECC, DCC, developers, DfT	S106 / CIL, DCC/LTP, DfT	2021-2026	
Exeter Cycle parking: Improved cycle parking across Exeter	Transport - Active travel	D. Strategic	£100,000	DCC, ECC, developers	S106 / CIL, ECC, DCC/LTP	2026-2041	

New primary school at Water Lane: Capacity for 420 pupil on a site of at least 1.6ha. Communal space and office as a children's centre service delivery base. Cost based on £20,305 primary new build rate per pupil.	Education - primary	A. Critical B. Important	£8,500,000	ECC, DCC, ESFA, developers	S106, DCC, DfE	2031-2041	Additional Wording (Column 1): The site size required to deliver the new primary school at Water Lane has been omitted from the IDP and needs to be included to ensure that it follows current Government guidance (Building Bulletin 103). We request that the wording in bold in Column 1 is added to the description. Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Columns 5 & 6): We request that reference to EFSA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.
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New Early Years Provision at Water Lane primary school. Cost based on £250 x 1705 family type dwellings.	Education – Early Years	A. Critical	£426,000	ECC, DCC, developers	S106, DCC	2031-2041	Additional row required: In order to allow for early years provision requirements in line with the County Council's Education Infrastructure Plan and Education Infrastructure Section 106 Approach. Classification (Column 3): It is essential this classification is identified a 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Column 5 & 6: We request that there is no reference made to EFSA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.
Further additional primary provision: Second new primary school with capacity for 420 pupils on a site of at least 1.6ha. Communal space and office as a children's centre service delivery base. Site to be confirmed. Cost based on £20,305 primary new build rate per pupil.	Education - primary	A. Critical B. Important	£8,500,000	ECC, DCC, other LPAs, ESFA, developers	S106, DCC, DfE	2031-2041	Additional Wording, (Column 1): The site size required to deliver the new primary school at Water Lane has been omitted from the IDP and needs to be included to ensure that it follows current Government guidance (Building Bulletin 103). We request that the wording in bold is added to the description.

							Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to EFSA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.
Further additional primary provision: 210 place expansion of an existing primary school site. Cost based on a primary expansion rate of £17,097 per pupil.	Education - primary	A. Critical	£3,600,000	ECC, DCC, other LPAs, developers	S106, DCC	2031-2041	Additional row required: In order for the IDP to be consistent with the Local Plan and Devon County Council's school place provision requirements we would request that an additional row is added with the description as highlighted in bold in Column 1 and with the 'Critical' classification highlighted in bold in Column 3. Column 5 & 6: We request that there is no reference made to EFSA and DfE as we

							are not expecting government funding to be forthcoming from these sources in the future for new school provision.
New early years provision at second new primary school and extended primary school(s). Cost based on £250 x 9000 family type dwellings.	Education - early years	A. Critical B. Important	£2,250,000	ECC, DCC, ESFA , developers	S106, DCC, DfE	2031-2041	Additional Wording, (Column 1): In order to allow for early years provision requirements in line with the County Council's Education Infrastructure Plan and Education Infrastructure Section 106 Approach we request that the wording in bold is added to the description. Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to ESFA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.

City-wide secondary school provision (1200 places required over plan period): Expansion of existing schools	Education - secondary	A. Critical B. Important	£28,200,000	ECC, DCC, ESFA , developers	S106, DCC, DfE	2031-2041	Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to EFSA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.
Special School Provision: Provision likely to be made both within and outside of the city administrative boundary to accommodate Exeter and subregional development	Education - special	A. Critical B. Important	£6,900,000	ECC, DCC, ESFA , developers	S106, DCC, DfE	2031-2041	Column 1: Include the additional wording shown in bold as new SEND places will be delivered within existing Exeter schools and also new planned provision outside of Exeter. Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by

							Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to EFSA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.
Additional further education provision	Education	D. Strategic	TBC	ECC, DCC, Exeter College, other providers	Exeter College, DfE	2026-2041	DCC request that this row is removed as DCC has not requested contributions for Post-16 provision as it is only a statutory requirement for post-16 SEND students. We therefore propose that SEND contributions should also be used towards additional specialist Post-16 places. This will be provided as part of special school provision in the row above.
Enhancements to materials reclamation facility	Waste management	D. Strategic	£8,000,000	ECC	CIL, ECC	2021-2031	
Harbour master and water sports infrastructure provision	Community facilities	C. Desirable	TBC	ECC, Exeter Canal and Quay Trust, developers	S106, ECC	2026-2036	
Boat storage infrastructure at Water Lane	Community facilities	C. Desirable	TBC	ECC, DCC, Exeter Canal and Quay Trust, developers	S106, ECC	2026-2036	

Primary healthcare: Additional capacity at various practices	Healthcare	B. Important	£8,000,000	ECC, DCC, NHS, developers	S106, NHS	2021-2041	
Water Lane: Primary care provision: Either expansion of current surgeries (preferred option) or new GP surgery at Water Lane	Healthcare	B. Important	TBC	ECC, DCC, NHS, developers	S106, NHS	2026-2041	
Health visitor base to travel, storage and meeting/consultation spaces within surgeries of community buildings	Healthcare	C. Desirable	TBC	ECC, DCC, NHS, developers	S106, NHS, DCC	2026-2031	
Surgical Hub	Healthcare	D. Strategic	£25,000,000	ECC, DCC, RDUH, healthcare estate contractors, NHS England	NHS	2026-2031	
Community Diagnostic Centre	Healthcare	D. Strategic	£25,000,000	ECC, DCC, RDUH, healthcare estate contractors, NHS England	NHS	2026-2031	
A 70 unit extra care housing scheme at Water Lane	Healthcare	C. Desirable	TBC	ECC, DCC, Homes England, providers, developers	S106, DCC, RP, Homes England	2026-2036	
A second 70 unit extra care housing scheme on a site to be confirmed	Healthcare	C. Desirable	TBC	ECC, DCC, Homes England, providers, developers	S106, DCC, RP, Homes England	2036-2041	
Site of 6 gypsy and traveller pitches	Community facilities	B. Important	TBC	ECC, DCC, housing providers, developers	S106, Homes England	2036-2041	
Safe access and egress route for Water Lane including crossings/crossing improvements of the canal and the River Exe	Flood risk management	A. Critical	£30,000,000	ECC, DCC, EA, developers	S106 / CIL, EA, DCC (if related to potential	2036-2041	

					active travel), on-site provision		
Safe access and egress route for Red Cow	Flood risk management	A. Critical	TBC	ECC, DCC, EA, developers	S106 / CIL, EA, DCC (if related to potential active travel), on-site provision	2031-2041	
Safe access and egress route for Exe Bridges Retail Park	Flood risk management	A. Critical	TBC	ECC, DCC, EA, developers	S106 / CIL, EA, DCC (if related to potential active travel), on-site provision	2036-2041	
Upgrade to Countess Wear sewage treatment works to serve wider area	Utilities	A. Critical	£15,000,000	ECC, South West Water	SWW	2031-2036	
Additional sewage treatment works east of Exeter (outside of the city administrative area) in East Devon to serve wider area	Utilities	A. Critical	£20,000,000	ECC, EDDC, South West Water	SWW	2031-2041	
Exeter main grid supply point: 132kv reinforcements	Utilities	A. Critical	£10,000,000	ECC, National Grid	National Grid	2036-2041	
New bulk supply point: 132 to 33kv east of Exeter (outside of the city) in East Devon.	Utilities	A. Critical	£10,000,000	ECC, National Grid	National Grid	2036-2041	
City district heating network	Utilities	D. Strategic	TBC	ECC, utilities, developers	S106 / CIL, utility providers	2026-2041+	
Additional cemetery provision - either additional capacity, extension or new site	Community facilities	D. Strategic	TBC	ECC, developers	S106 / CIL, ECC	2031-2036	
Improvements to the Green Circle: On-route and access improvements	Green infrastructure, parks and open space	D. Strategic	TBC	ECC, developers	S106 / CIL, ECC	2026-2041	

Creation of Northbrook Arboretum Valley Park - open space linking Riverside and Ludwell Valley Park	Green infrastructure, parks and open space	D. Strategic	£300,000	ECC, Devon Wildlife Trust, developers	S106 / CIL, ECC, Devon Wildlife Trust	2026-2041	
Expansion of Mincinglake Valley Park	Green infrastructure, parks and open space	D. Strategic	TBC	ECC, Devon Wildlife Trust, developers	S106	2026-2031	
Creation of new Whitycombe Valley Park	Green infrastructure, parks and open space	D. Strategic	TBC	ECC, Devon Wildlife Trust, developers	S106 / CIL, ECC, Devon Wildlife Trust	2026-2041	
Creation of new area of Valley Park as part of Clyst Valley Regional Park	Green infrastructure, parks and open space	D. Strategic	TBC	ECC, Devon Wildlife Trust, developers	S106 / CIL, ECC, Devon Wildlife Trust	2026-2041	
Improvements to St Thomas and Heavitree splash parks	Green infrastructure, parks and open space	C. Desirable	£500,000	ECC	CIL, ECC	2021-2026	
City-wide play area improvements	Green infrastructure, parks and open space	B. Important	£775,000	ECC	S106 / CIL	2026-2031	
Additional allotments including at Shillingford Road	Green infrastructure, parks and open space	C. Desirable	TBC	ECC	S106, ECC	2026-2041	
Parks and open space ECC depot relocation (from Belle Isle)	Green infrastructure, parks and open space	A. Critical	£2,000,000	ECC	S106 / CIL, ECC	2026-2031	
Wonford community wellbeing hub	Sport and leisure	D. Strategic	£7,000,000	ECC, Sport England, Active Travel England, NHS	S106 / CIL, ECC, Sport England, Active Travel England	2026-2031	
Community Sports Village (Exeter Arena and Isca Centre site)	Sport and leisure	D. Strategic	TBC	ECC, Sport England, Active Travel England	S106 / CIL, ECC, Sport England, Active Travel England	2031-2041	

King George V Playing Fields: Community sports hub	Sport and leisure	D. Strategic	TBC	ECC, Sport England, Football Foundation, Exeter City Community Trust	S106 / CIL, ECC, Sport England, Football Foundation, Active Travel England	2026-2036	
Bromhams Farm (Water Lane): Community Sport Hub	Sport and leisure	D. Strategic	TBC	ECC, DCC, EA, Sport England, developers	S106 / CIL, ECC, Sport England	2031-2041	
Exwick 3G pitch and sports pavilion	Sport and leisure	D. Strategic	TBC	ECC, Exeter College, Sport England	Exeter College	2026-2031	
Riverside Leisure Centre: Roof replacement	Sport and leisure	D. Strategic	TBC	ECC, Sport England	ECC	2026-2031	
Playing pitch provision as per the playing pitch strategy	Sport and leisure	B. Important	TBC	ECC, Sport England, sports governing bodies	S106 / CIL, ECC	2026-2041	
Pinhoe community hub: Community building	Community facilities	B. Important	£2,000,000	ECC, Pinhoe Community Hub Trustees, NHS	S106 / CIL, ECC	2026-2031	
Community building at Water Lane: Community building with flexible space for uses including library, youth, children and adult services and community uses	Community facilities	B. Important	£1,500,000	ECC, DCC, community group	S106 / CIL, DCC	2026-2036	
Improvements to city cultural and entertainment venues.	Culture	D. Strategic	TBC	ECC, Arts Council	S106 / CIL, ECC, Arts Council, National Lottery	2031-2041+	
Improvements to strategic police infrastructure	Emergency services	D. Strategic	TBC	ECC, Devon and Cornwall Police	Devon and Cornwall Police	2031-2041	