

# **Exeter Plan**

## **Hearing statement**

### **Matter 10: Transport, travel and communications**

April 2026

**Exeter City Council**  
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## **1. Introduction**

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 10 which addresses transport, travel and communications.
- 1.2. The statement is divided into sections which cover the following issues:
  - Initial questions.
  - Issue 1: Sustainable Movement, Travel and Public Transport: Policies STC1, STC2, STC3, STC4, STC5 and STC6.
  - Issue 2: Transport Infrastructure, Motorways and Digital Communications: Policies STC7, STC8 and STC9.

## 2. Initial questions

### **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?**

- 2.1. Yes. Transport has been considered from the earliest stages of plan-making. Initial work on the Exeter Plan emerged from work undertaken on the Greater Exeter Strategic Plan (GESP), a statutory plan advanced jointly by the City Council, the three neighbouring District Councils and Devon County Council (DCC) as local highway authority working in a single, cross-authority team including transport expertise. Although the GESP did not progress beyond an initial draft, it set the tone for subsequent Local Plans including the Exeter Plan in terms of spatial and transport strategy. On this basis, the 2020 Exeter Transport Strategy (EVB-STC-04) and the initial stages of the Exeter Plan were developed in tandem. Later, the Exeter Plan was prepared in parallel with the Local Transport Plan (EVB-STC-01).
- 2.2. The vision for the Exeter Plan (CSD-02, paragraph 3.2, page 14) includes a series of outcomes. The fifth outcome is directly related to transport - A liveable and connected city. The vision has helped to drive the plan, including the spatial strategy.
- 2.3. The early development of the spatial strategy for the Exeter Plan was informed by the Sustainability Appraisal (EXM-02a). Four spatial options were identified, one of which (option D) specifically considered the potential to focus development on public transport hubs and routes within the city (EXM-02a: paragraph 4.2, page 76). This work has informed Policy S1: Spatial strategy which itself includes three transport elements (points 4, 7 and 8) including focusing the majority of development on strategic brownfield sites, particularly in locations close to the city centre to support its ongoing vitality and access to public transport hubs.
- 2.4. In terms of sites, transport has been a vital and central part of the four iterations of the Housing and Economic Land Availability Assessment (HELAA) (EVB-H-02a-d), as set out in the HELAA methodology (EVB-H-02e: page 10, paragraph 5.4) which explains the importance of transport to the site assessment and the input of DCC as the local highway authority and National Highways. The highway authorities were involved in each iteration of the HELAA.
- 2.5. With regard to transport policies, the early stages of drafting were undertaken jointly with transport planners from DCC. Joint working on the policies continued throughout plan preparation.
- 2.6. Transport assessment work has been undertaken jointly with the two highways and three adjacent District Councils. This has resulted in the authorities producing modelling which is feeding into the emerging Greater Exeter Transport Study (various documents in the EVB-STC section of the evidence base) and the Infrastructure Delivery Plan (IDP) (EVB-IF-02a).

**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?**

2.7. The preparation of the Exeter Plan has been consistent with paragraph 110b of the NPPF which states that planning policies should 'be prepared with the active involvement of local highways authorities... so that strategies and investments for supporting sustainable transport and development patterns are aligned'. In the case of Exeter, there is alignment between the Exeter Plan, the Local Transport Plan (EVB-STC-01), the Exeter Transport Strategy (EVB-STC-04), the Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) (EVB-STC-03), the Bus Service Improvement Plan (BSIP) (EVB-STC-02) and the emerging Greater Exeter Transport Study (GETS) (various documents with references EVB-STC). This alignment has informed the following elements of the plan:

- The vision
- The spatial strategy (Policy S1)
- Site assessment
- Transport mitigation and
- Transport policies.

2.8. The Exeter Plan's vision has been directly informed by the Exeter Transport Strategy (EVB-STC-04) which was adopted by DCC in 2020 before work started on the Exeter Plan in 2021. The Plan's vision includes an outcome of 'a liveable and connected city'. This has been directly informed by the Transport Strategy's theme of 'greater connectivity'.

2.9. The Exeter Plan's spatial strategy (policy S1) has also been informed by the Transport Strategy, which has an aim for 50% of all trips within the city to be made on foot or by bike (EVB-STC-04: page 12, paragraph 6.5). Policy S1 focuses development on strategic brownfield sites close to the city centre and with good access to public transport hubs, in locations that maximise walking, cycling and public transport and near enough to key services and facilities to allow residents to meet most of their daily needs easily on foot (elements 4, 7 and 8).

2.10. Site assessment work and the Plan's strategic brownfield sites allocation policies are directly aligned with transport strategy documents, particularly the Local Cycling and Walking Infrastructure Plan (EVB-STC-03). This is demonstrated by the transport elements of HELAA assessments (EVB-h-02a), which make specific reference to LCWIP routes as transport requirements associated with development. These improvements are then identified in the strategic brownfield site policies as mitigation and also included in the IDP (EVB-IF-02a). The IDP also includes a wide range of other projects consistent with the LCWIP, BSIP, the Exeter Transport Strategy and the new Local Transport Plan 4 (LTP4) (EVB-STC-01). These projects are also factored into the GETS

2.11. The Exeter Plan's transport policies have seen significant joint drafting with transport planners at DCC. This has enabled the policies to reflect key transport projects set out in the LTP4, LCWIP and BSIP. Examples are the

inclusion of various cycle routes in policy STC3, bus routes in policy STC4 and shared mobility provision in policy STC5.

- 2.12. The GETS is a strategic, sub-regional traffic modelling project which assesses development impact across the four districts within the Exeter travel to work area, particularly addressing impacts on the strategic road network and its junction on the edge of Exeter together with the key radial routes into the city. The GETS includes a raft of evidence documents (see the EVB-STC elements of the evidence webpage). The GETS has been informed by all the projects in the LCWIP and BSIP which are included in the transport policies, the strategic brownfield site allocation policies and the IDP.
- 2.13. National Highways and DCC support the spatial strategy and site allocations in the Exeter Plan and, through the GETS, have identified that the development planned for in the Exeter Plan does not result in the need for interventions on the strategic highway network.

### **3. Issue 1: Sustainable Movement, Travel and Public Transport – Policies STC1, STC2, STC3, STC4, STC5 and STC6**

#### **Q1. How will the outcomes set out in Policy STC1 be implemented? Have these outcomes been adequately tested to ensure that they are viable and deliverable?**

- 3.1. Policy STC1: Sustainable Movement is a strategic, enabling policy setting out the high-level role that transport will play in achieving the vision for the Plan and sustainable development more widely. The policy's implementation is set out in the opening paragraph of the policy, which explains that outcomes will be sought through the development management process and associated joint working between the City Council and other authorities and stakeholders. A key part of this will be the implementation and delivery of the spatial strategy set out in Policy S1. This could include, for example, joint work on infrastructure planning and delivery of transport infrastructure at the strategic brownfield site allocations and the seeking of appropriate transport contributions.
- 3.2. The latter point regarding appropriate transport contributions is addressed in suggested main modification SMM57 (CSD-03: page 24). This has been included in response to a National Highways representation, as documented in the associated Statement of Common Ground (DTC-03j: page 23). It will ensure that contributions secured through the development management process support the delivery of key transport projects set out in transport policy documents such as LTP4. This approach will support implementation of the outcomes set out in Policy STC1.
- 3.3. The implementation of the policy and the achievement of its outcomes have been adequately assessed through the Local Plan Viability Assessment (LPVA) (EVB-IF-01a) and its Addendum (EVB-IF-01b). Specific costs have not been included in the testing because the policy is a strategic, enabling policy which draws on and helps to deliver strategic strands of the Plan, including for example, the spatial strategy (EVB-IF-01a: Appendix B, page 59). The outcomes that will be achieved by the policy will, in most cases, have no direct costs but are addressed elsewhere in the testing. For example, criterion a of policy STC1 regarding delivering of the spatial strategy is addressed through consideration of value areas in the testing (EVB-IF-01a: Figure 4.1, page 24). Criterion b of policy STC1 to support the transport hierarchy will be addressed significantly through development layout and design without additional, specific costs and criterion c to provide mixed use development will be considered through development values.
- 3.4. Suggested main modification SMM57 (CSD-03: page 24) is the only direct reference to contributions or costs within the policy. These potential transport contributions are covered in the development costs set out in the LPVA (EVB-IF-01a: table 4.13, page 33). The costs are based on a review of section 106 agreements. In summary, the outcomes are viable. They are also deliverable as demonstrated by the alignment between the Plan and transport policy documents including the LTP4 (EVB-STC-01) and the Exeter Transport Strategy (EVB-STC-04). In the opening paragraph, the policy notes the

importance of joint working between the City Council, other authorities and stakeholders which include DCC and National Highways as transport authorities. There is strong alignment between the City Council and the two transport authorities, as demonstrated by ongoing work on the GETS, clear joint working and only a modest set of representations being made. This evidenced in two Statements of Common Ground (DTC-03b and DTC-03j). The close alignment of key the partners will help to ensure the policy is deliverable.

**Q2 How has transport-related social exclusion been considered in the formulation of Policy STC1?**

- 3.5. Although addressing social exclusion is not mentioned specifically in policy STC1, a series of the outcomes listed will, particularly when linked to the spatial strategy in policy S1, help to address social exclusion and promote inclusion.
- 3.6. Criteria a and b of the policy set out the importance of supporting development in locations that minimise the need to travel and provide for mixed use development which enables access to daily needs by active travel. These outcomes will help facilitate local access to jobs, facilities and services, which reduces the cost of travel and therefore widens inclusive access to all, helping to reduce social exclusion.
- 3.7. Criterion b, d and e of the policy work together to support active travel and public transport through the transport hierarchy, providing for high quality active travel routes and attractive public transport. These outcomes will also widen transport options for communities, helping to reduce social exclusion.
- 3.8. Finally, criterion f will increase the choice of travel modes through new forms of car use, including shared mobility. This additional choice will help to improve access to jobs, services and community facilities.
- 3.9. The policy has been assessed in the Sustainability Appraisal (SA) which includes SA objective 6 'to support community cohesion and safety' (EXM-02a: page 70). This asks various questions related to community, integration, meeting the needs of groups with protected characteristics and supporting cohesive neighbourhoods. The SA assesses policy STC1 as having minor positive effects in relation to SA objective 6, demonstrating the policy's positive impact in supporting some key strands of social inclusion.
- 3.10. In summary, the policy supports provisions to provide mixed use development, locate development close to services and provide greater travel opportunities for all. Together, these will help to build more inclusive communities and address transport-related social exclusion.
- 3.11. In order to address the issue of social exclusion more specifically, additional minor modification SAMM64 is suggested (CSD-03, page 81).

**Q3 How have ecological connectivity and flood risk been considered in the formulation of Policy STC3?**

- 3.12. Ecological connectivity is considered in policy STC3 through the introductory text, which refers to the important role of street planting and biodiversity enhancements in creating attractive active travel environments. Further detail is provided by the policy's inclusion of specific active travel routes such as long distance trails in criterion a, strategic routes along waterways in criterion b and links to public rights of way in criterion f.
- 3.13. This reflects the Green Infrastructure Strategy which identifies the role that active travel routes can play as green ways (EVB-NE-09c: page 32, paragraph 6.2).
- 3.14. This is also informed by the LCWIP which identifies opportunities to link the city with surrounding rural areas including through the creation of green lanes (EVB-STC-03: page 6, paragraph 2.1.1). Finally, it reflects the new LTP4 which identifies Devon as 'the place to be naturally active' as one of six objectives of the plan. This frames the importance of green lanes in supporting active travel to and from Exeter and its rural hinterland (EVB-STC-01: page 22).
- 3.15. The City Council and DCC as the local transport authority have a proven track record of working together to deliver high quality active travel routes which provide ecological as well as travel links. The network through the Monkerton strategic allocation provides a good example of this approach.
- 3.16. Flood risk has been considered in the formulation of Policy STC3. The introductory text refers to creating active travel environments which are direct, safe and attractive. In meeting these aims, routes will need to be designed and provided in the context of flood risk.
- 3.17. It is acknowledged that some active travel routes, including those along waterways, could be affected by flood risk, particularly during the winter months. However, these waterways also have significant benefits in terms of providing attractive routes which are direct, relatively flat, linked to development and provide opportunities for ecological connectivity and accessing open space and nature.
- 3.18. Policy STC3 aims to address the issue of flood risk by requiring a dense and permeable network of active travel routes to provide a variety of choices and alternative options. This would overcome issues of route closures if flooded temporarily. The policy is also consistent with the LCWIP and the routes promoted therein (EVB-STC-03). Providing for an attractive network of routes drawing upon the LCWIP is consistent with the NPPF (paragraph 110d).
- 3.19. The design of active travel routes will consider flood risk within preparatory studies. This will also be subject to the development management process and the necessary flood risk assessments and design responses.

**Q4. How would the mobility hubs required by Policy STC4 be delivered?**

- 3.20. The mechanism for delivering a mobility hub will depend on its scale. The mobility hubs referenced in policy STC4 are anticipated to cover a variety of scales. For example, neighbourhood-scale mobility hubs may provide a car-club vehicle co-located with bike hire close to a bus stop, whilst a larger scale

facility may encompass a full range of interchange facilities at stations or park and ride sites.

- 3.21. Neighbourhood scale mobility hubs are anticipated to be delivered by development as per the requirements of the policy for large scale development proposals. This infrastructure will be secured through a section 106 agreement requiring either direct delivery or the provision of contributions collected by the local transport authority. This approach is currently being implemented through the planning application at Water Lane South (23/1007/OUT, resolution to grant) which provides for the onsite provision of a mobility hub with car club vehicles, electric vehicle charging infrastructure and electric bike hire<sup>1</sup>. Bus stops will also be provided on site.
- 3.22. Mobility hubs are important to prioritising shared mobility, an approach supported by DCC as shown by the Exeter Transport Strategy (EVB-STC-04: page 14, paragraphs 6.21 and 6.22) and LTP4 (EVB-STC-01: pages 28-29, paragraph 4.6).
- 3.23. Strategic mobility hubs will be delivered as improvements to existing interchange facilities at park and ride locations and rail stations. The local transport authority will lead the delivery of these improvements. This approach is included in the Local Transport Plan which also commits to a new park and ride strategy (EVB-STC-01: page 25).

**Q5 Are the requirements for major development set out in policies STC3 and STC4 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?**

- 3.24. The requirements for major development in policies STC3 and STC4 are justified because they have been developed through direct discussion with the local transport authority and in parallel with, or informed by, associated transport policy documents including the LTP4 (EVB-STC-01). The requirements are also justified by the Sustainability Appraisal, which considers that the policies will have a number of likely positive effects and no likely negative effects (EXM-02a: page 185, table 6.7) when considered against reasonable alternatives.
- 3.25. The requirements for major development in policies STC3 and STC4 are consistent with national policy. The policies are consistent with the overarching approach in the NPPF of promoting and pursuing opportunities for walking, cycling and public transport (paragraphs 108c and e) which reflects the spatial strategy in policy S1. The policies have been prepared with the involvement of local highway authorities as required by the NPPF (paragraph 110b).
- 3.26. The requirements for major development in policies STC3 and STC4 are based on robust and up to date evidence including:
- The Exeter Transport Strategy (EVB-STC-04)
  - The Devon and Torbay Local Transport Plan (EVB-STC-01)

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<sup>1</sup> Available at:

[https://planningdocs.exeter.gov.uk/servlets/direct/KQFyFBNSnhGsghdFf3F/2/899000/1/1/AS\\_PDF\\_FILE](https://planningdocs.exeter.gov.uk/servlets/direct/KQFyFBNSnhGsghdFf3F/2/899000/1/1/AS_PDF_FILE)

See recommendations: page 84

- The LCWIP (EVB-STC-03)
  - The BSIP (EVB-STC-02) and
  - The emerging GETS (component assessment reports: EVB-STC).
- 3.27. The requirements are deliverable: they are consistent with the policies and approaches of DCC and National Highways as the two highway authorities. Delivery mechanisms are detailed in the IDP (EXM-02ab).
- 3.28. The requirements of policies STC3 and STC4 are viable. The Local Plan Viability Assessment (LPVA) explains that section 106 allowances have been made regarding contributions for active travel and public transport (EVB-IF-01a, Appendix B, pages 59 and 60), whilst a number of the requirements do not have specific costs associated with them because they relate to development location, layout and design.
- 3.29. Taking the section 106 contributions into account, the LPVA concludes that 'the types of development expected to deliver the supply on the allocations are viable with all the policies set out in the Local Plan' (EVB-IF-01a: page 49, paragraph 6.6). Further viability assessment has been undertaken for the strategic brownfield sites as documented in the Local Plan Viability Assessment – Addendum (LPVA-A). The LPVA-A assumes additional contributions for mobility hubs (EVB-IF-01b: Appendix B, page 42 onwards). The assessments variously conclude that the strategic brownfield sites and large-scale residential allocations are viable (an example conclusion is provided in the LPVA-A, page 33, paragraph 9.11). Policies STC3 and STC4 are therefore implicitly considered viable.

**Q6 How has access for emergency vehicles; carers; health visitors; medical professionals; social workers or others who need to use their cars and to park near where they are visiting been considered in the formulation of Policy STC5?**

- 3.30. The Publication Exeter Plan does not mention specific provisions for carers, health visitors, medical professionals, social workers or others who need to use their cars and park near to where they are visiting.
- 3.31. In a similar vein to the existing policy text which makes provision for loading, unloading and deliveries, main modification SMM63 is suggested to address the needs of carers and medical professional etc (CSD-03, page 26).

**Q7. Are policies STC1, STC2, STC3, STC4, STC5 and STC6 positively prepared, justified, effective and consistent with national planning policy?**

- 3.32. Policies STC1, STC2, STC3, STC4, STC5 and STC6 are positively prepared, justified, effective and consistent with national planning policy.
- 3.33. The policies are positively prepared because they have been subject to significant discussion with DCC and National Highways as the two highway authorities to ensure development needs are met in a way which is consistent with achieving sustainable development and addressing transport impacts. This is evidenced by the agreements over the approaches to transport policy in

the Plan and suggested modifications as documented in the Statements of Common Ground (DTC-03b and DTC-03j).

- 3.34. The policies are justified because they provide an appropriate strategy for transport provision that is consistent with a suite of transport policy documents, including:
- The Exeter Transport Strategy (EVB-STC-04)
  - The Devon and Torbay Local Transport Plan (EVB-STC-01)
  - The LCWIP (EVB-STC-03)
  - The BSIP (EVB-STC-02) and
  - The emerging GETS (component assessment reports: EVB-STC).
- 3.35. The policies are also justified by the SA which explains their likely positive effects (EXM-02a: table 6.7, page 185). The SA also assesses these policies as having no likely negative effects.
- 3.36. The policies are effective because they are deliverable (subject to suggested modifications), as demonstrated by the support of DCC and National Highways and the inclusion of key projects in the suite of transport policy documents and IDP (EXM-02ab). The policies are demonstrably viable as set out in the LPVA (EVB-IF-01a: page 49, paragraph 6.6) and LPVA-A (EVB-IF-01b) in terms of the strategic brownfield sites and large scale residential allocations.
- 3.37. The policies are consistent with national policy. This includes NPPF paragraph 108 which identifies the importance of considering transport early in plan-preparation, and of plans setting out opportunities to promote walking and cycling and identifying how movement and street patterns contribute to high quality places. They are consistent with NPPF paragraph 109 which states that significant development should be focused on locations which are or can be made to be sustainable in terms of limiting the need to travel. Finally, the policies are consistent with NPPF paragraph 110 which sets out the need to pursue mixed use development to minimise the number and length of trips, to actively involve the local highway authorities to ensure alignment of planning and transport policy and provide for attractive walking and cycling networks drawing on LCWIPs.

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

- 3.38. Yes, the following main modifications (CSD-03: pages 24-27) are considered necessary for soundness, as they will ensure that the plan is positively prepared to achieve sustainable development and that the plan is effective by being deliverable and based on discussions with partners as evidenced in the Statement of Common Ground with National Highways (DTC-03j)
- SMM57 (relating to STC1)
  - SMM58 (relating to STC2)
  - SMM59 (relating to STC3)
  - SMM60 (relating to STC3)
  - SMM61 (relating to STC4)
  - SMM62 (relating to STC4)
  - SMM63 (relating to STC5)

- SMM64 (relating to STC6) and
- SMM65 (relating to STC6).

3.39. The suggested modifications derive from representations at Regulation 19 stage from National Highways, a local political group, a developer and individuals. A number relate to the National Highways representation (B-06-Various) and discussions documented in the Statement of Common Ground (DTC-03j). All have been discussed with National Highways and DCC as highway authorities who are comfortable with the revisions.

3.40. A further modification is required to policy STC5. To ensure that the policy is sound, the Council would like to suggest the following main modification relating to the reference to the Sustainable Transport Supplementary Planning Document:

*'Levels of car parking should be provided in accordance with having regard to the indicative standards in the adopted Sustainable Transport Supplementary Planning Document and any subsequent replacement'.*

3.41. The following additional minor modifications have been suggested to the supporting text:

- SAMM63
- SAMM64
- SAMM66
- SAMM68
- SAMM69
- SAMM71 and
- SAMM72.

3.42. However, some of these modifications may be considered main modifications, including SAMM69 relating to scheme funding arrangements. A discussion at the examination may therefore be helpful.

#### **4. Issue 2: Transport Infrastructure, Motorways and Digital Communications – Policies STC7, STC8 and STC9**

**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?**

- 4.1. Significant discussions have been held with both National Highways and DCC in the preparation of the Exeter Plan. As a result of the significant focus on brownfield development, including on strategic sites in and close to the city centre as set out in policy S1, strategic highway improvements have not been identified as required to mitigate development impact at specified points in the housing trajectory for development in Exeter. This is evidenced in the Regulation 19 representations provided by National Highways (B-06-Various) and Devon County Council (A-01-Various), neither of which identify specific strategic highway improvements as requirements for specific sites. Assessment has also been provided by both highway authorities in the HELAA (EVB-H-02a-d).
- 4.2. The National Highways response refers to the emerging GETS in the context of cumulative impacts across the wider area and the need for a monitor and manage approach to consider the future operation of the strategic road network. It goes on to explain the need for active travel, bus and rail travel interventions to limit the need for costly improvements to the strategic road network (SRN) and identifies that travel outcomes should be monitored and used to inform future Local Plan reviews (B-06-Various: paragraph 52). The response does not stipulate the need for any improvements to the SRN to mitigate developments in Exeter during the plan period.
- 4.3. A summary of the technical position is provided by the DCC Greater Exeter Strategic Modelling Report. This sets out that applications for the development allocations will need to be accompanied by a transport assessment covering both the local highway network and the SRN. It goes on to state that 'it is not envisaged that major capacity improvements are required at these junctions to accommodate the development proposed in the local plans (EVB-STC-05: page 10, paragraph 3.2.13).
- 4.4. The current focus of the GETS is the potential mitigations required to accommodate development proposed in the East Devon Local Plan at Marcombe new community. Operational Assessments for different scenarios of growth (EXM-02t) may trigger the need for improvements to the junctions on the SRN; however, these assessments are ongoing and are linked to development outside the Exeter boundary with potential requirements yet to be identified.
- 4.5. The IDP (EXM-02ab) includes a strategic 'category' of infrastructure project. 'Strategic' is defined as projects 'required to support the strategic needs of the city and are not specifically related to development requirements (any more than this infrastructure would support existing development). There may be

some cross-over between strategic projects which are also related to development' (EXM-02ab: page 3).

- 4.6. Eight strategic transport projects are listed in the IDP; however, these projects are not required at specific trigger points to unlock development allocated in the Exeter Plan and so have not directly influenced the trajectory for the Exeter Plan.
- 4.7. In summary, the transport evidence does not identify specific SRN improvements related directly to Exeter Plan developments. The trajectory is therefore not contingent upon such SRN improvements.

**Q2. How have the effects of development on the non-strategic (local) highway network been assessed as part of the plan-making process? Where highway mitigation is required, where is this set out and how will it be achieved?**

- 4.8. The effects of development on the non-strategic, local highway network have been assessed and addressed through a series of processes:
  - The HELAA (EVB-H-02a-d) and site allocation policy discussions
  - Preparation of the LTP4 (EVB-STC-01), LCWIP (EVB-STC-03) and BSIP (EVB-STC-02)
  - Preparation of the Clyst Road and Newcourt Road transportation and access strategy (EVB-STC-18) and
  - Work on the emerging GETS.

HELAA

- 4.9. Through the HELAA, DCC as local highway authority provided detailed suitability assessments of all sites (EVB-H-02a: page 15, paragraph 1.2) and also input into achievability assessments through their place on the HELAA panel (EVB-H-02e: page 7, section 4.0). Associated discussions were also held with DCC following plan consultations.

Transport policy

- 4.10. In terms of DCC transport policy, the housing requirement and site allocations for the Exeter Plan emerged in parallel with the LTP4, LCWIP and BSIP. This enabled DCC to assess the impact of the development sites on transport strategy and the need for interventions. The Exeter Transport Strategy (EVB-STC-04) has a different relationship with the Exeter Plan because it was adopted before work began on the Plan.
- 4.11. The LTP (EVB-STC-01) has been directly informed by a review of local plans and their content including the Exeter Plan. Taking this into consideration alongside the central role of Exeter at the heart of large travel to work area, the LTP includes an Exeter-specific strategy. A key element of the Exeter strategy

is to unlock the development in the Exeter Plan (EVB-STC-01: page 23, paragraph 4.4).

- 4.12. The Exeter area Action Plan in the LTP (EVB-STC-01: chapter 10, page 72) summarises the schemes to be delivered grouped into the following themes:

- City centre public realm
- Key Pedestrian Corridors
- Strategic Cycle Network
- Strategic Trail Network
- Quiet Lanes
- Area Wide changes
- Access to Cycle
- Behaviour Change Projects
- Sustainable New Development
- Devon Metro
- Interchange
- Attractive Urban Bus Networks
- Connected City Region: Bus
- Zero Emission Ticking System
- Lower Emission Vehicles
- Innovation and Invention.

- 4.13. This list does not include specific local highway capacity schemes.

- 4.14. The LCWIP specifically aims to help accommodate housing growth in Exeter (EVB-STC-03: page 4, paragraph 1.1.4). It seeks to achieve this through a review of land use policies (stage 2), an assessment of cycle flows (stage 3) and scheme prioritisation (stage 5) (EVB-STC-03: page 5 and page 13, paragraph 3.2.11). Key routes linking to development sites are included in the IDP.

- 4.15. The BSIP has an aim to support the growth agenda (EVB-STC-02: page 13, paragraph 1.8.3) with key route corridors converging on the city centre and the new bus station. The convergence on the city centre ensures that the strategic mixed use brownfield allocations will be well served by high quality and frequent services.

Clyst Road and Newcourt Road transportation and access strategy

- 4.16. This is a DCC strategy (EVB-STC-18) prepared to manage the access arrangements of the various existing and future developments in Topsham. These include the four Exeter Plan allocations in Topsham, St Bridget Nurseries and Land adjacent Ikea, Newcourt, as well as the draft East Devon Local Plan's proposed allocation north of Topsham.
- 4.17. The strategy includes a series of interventions (page 46, table 4), the majority of which provide for active travel and improving public and shared transport.

However, there are four potential highway schemes listed which will address development impact in the local area.

Modelling: Greater Exeter Transport Study (GETS)

- 4.18. Detailed, quantitative assessment of the effects of development on the local highway network have been undertaken through the emerging GETS. This is a joint project of the four District Councils in the Greater Exeter area together with DCC, with significant involvement of National Highways.
- 4.19. The study focuses on the highway network in and around Exeter, including the strategic road and local highway networks. The objective is to assess how emerging Local Plans for Exeter, East Devon, Mid Devon and Teignbridge will impact the transport network across Greater Exeter up to the end of emerging Local Plan periods, and to develop potential interventions to manage these impacts.
- 4.20. The evidence base for the Exeter Plan includes a range of technical GETS documents with references EVB-STC-05 onwards. An overarching summary report is in preparation to bring together the work undertaken and the reports produced to date.
- 4.21. The GETS technical work has involved the following stages, which include significant traffic modelling including Saturn forecasts and VISSIM operational assessments:

*1. Identification of Local Plan development locations*

- 4.22. This stage identified the key development locations across the four districts that will generate traffic on the highway network including the allocations in the Exeter Plan.

*2. 2040 Core Scenario*

- 4.23. This stage was undertaken with the use of an updated Saturn traffic assignment model for the wider Exeter area. It provides a baseline forecast presenting how the transport network across the area is expected to perform in 2040 before any mitigation is applied. This included all proposed Local Plan development in existing and emerging plans. The results of the analysis demonstrate that mitigation is required to reduce the impact of development trips on the highway network.

*3. 2040 Scenario 1*

- 4.24. The 2040 Scenario 1 considers the impact of a package of committed and pipeline sustainable transport schemes designed to mitigate the impact of Local Plan traffic growth. These interventions include those set out in the LCWIP and BSIP as well as those necessary to mitigate specific site allocations. The results from the analysis for the 2040 Scenario 1 shows that the committed schemes alone are not sufficient to mitigate the impact of all Local Plan development from the four Council areas and that further mitigation will be required.

*4. 2040 Scenario 2 – Additional Mitigation*

- 4.25. This stage builds on 2040 Scenario 1 by testing additional potential sustainable transport schemes beyond those already committed in existing transport strategies and plans. These could help to further mitigate emerging Local Plan developments. These schemes include active travel, bus, wider provision of mobility hubs and rail. It is of note that schemes providing additional highway capacity are not included in this assessment.

*5. Operational Assessment: Strategic Road Network*

- 4.26. A further stage is being undertaken on behalf of National Highways. This specifically focuses on the traffic impact on the SRN of the second East Devon new community at Marcombe. This operational assessment work is being undertaken using a VISSIM model. It is not required to consider the impact of development in Exeter.
- 4.27. There are no specific highway capacity interventions required to mitigate the impact of development in Exeter emerging through the current work on the GETS. In addition, DCC has confirmed that operational assessments of specific junctions in Exeter are not required to consider the impact of development in Exeter at plan-making stage. In the vast majority of cases, development mitigation is to be provided by a range of sustainable transport measures.

Summary

- 4.28. The discussion of the transport policy documents covering Exeter, the Clyst Road and Newcourt Road transportation and access strategy and the Greater Exeter Transport Study has underlined the focus on sustainable transport as opposed to improvements which provide additional highway capacity. This approach is consistent with the NPPF, particularly paragraphs 108c, 109, 110b, together with the vision and validate approach set out in Department Transport Guidance covering the SRN and the delivery of sustainable development ('DfT Circular 01/2022', page 62, paragraph 15<sup>2</sup>).
- 4.29. There are a small number of specific highway schemes identified in the Clyst Road and Newcourt Road transportation and access strategy, while the strategic brownfield site allocation policy covering South Gate, SBA 5, requires on-site alterations to the highway layout that improve active travel routes between the city centre and the quayside.
- 4.30. Details of the small number of highway schemes which are required are brought together in the IDP (EXM-02ab) which also discusses delivery and funding sources in the context of a wider package sustainable transport projects which will provide the majority of mitigation. Scheme delivery will take place through partnership working between DCC, the City Council, neighbouring District Councils, and as far as may be required for the local highway network, National Highways. Contributions, or direct provision, will be secured from development to fund and deliver the schemes whilst external funding will be proactively sought where appropriate.

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<sup>2</sup> Available at: <https://assets.publishing.service.gov.uk/media/681a1c42a8cdfb0ccdb8e0cc/strategic-road-network-delivery-sustainable-development.pdf>

**Q3. Should the disused railway line across the Marsh Barton site be included in Policy STC7?**

- 4.31. The disused railway line at Marsh Barton is not identified for safeguarding in policy STC7 of the Publication Plan for safeguarding.
- 4.32. The line had been identified in the Regulation 18, Full Draft version of the Plan because at that stage, and in advance of an emerging flood access and egress route plan study being completed (EVB-CC-14a), it was considered as a possible option to provide safe access and egress for the Water Lane and Marsh Barton allocations.
- 4.33. However, following the removal of Marsh Barton as an allocation, and on completion of the Water Lane emergency access and egress route plan, an alternative route has been identified as the preferred option (EVB-CC-14a: Figure 4-2, page 22). This route will be more appropriate and deliverable than the disused railway line.
- 4.34. Consequently, there is no evidence of need, nor justification, for safeguarding the disused line within policy STC7. It has therefore been omitted.

**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?**

- 4.35. Exeter Services are located on the eastern edge of Exeter close to Junction 30 of the M5, west of the motorway. The Motorway Service Area (MSA) is not directly accessed from the M5 via dedicated on and off slips, which is the case for more efficiently operating facilities. Access is provided off Sidmouth Road and a roundabout on the local highway network.
- 4.36. This arrangement means that traffic accessing and exiting the MSA joins regular traffic to and from Exeter. This can add to congestion on the SRN including queuing on the mainline, particularly heading north bound, whilst also causing queuing on Sidmouth Road for traffic leaving Exeter.
- 4.37. The City Council considers that, contingent on its replacement and further traffic assessment, the closure of the MSA would be likely to remove trips from Junction 30 of the M5 and Sidmouth Road. This would reduce congestion on the SRN and local road networks during peak hours and during the summer months. Subject to further assessment, this would be likely to benefit the safe and efficient operation of the highway network.
- 4.38. It should be noted that as drafted, policy STC8 does not *require* the replacement of the MSA, nor allocate the site for alternative uses. It is a proactive enabling policy setting out the City Council's in-principle support for alternative uses on the site, subject to various criteria.
- 4.39. At Regulation 19 Stage, DCC did not object to policy STC8 as identified in its Statement of Common Ground (DTC-03b: paragraph 8.3, page 20). In its representation, National Highways did not object to policy STC8 but stated that traffic modelling will be required in future if the site is to be redeveloped and

also recommended additional text to state that a suitable replacement MSA will need to be identified and opened prior to any redevelopment. This is documented in the National Highways Statement of Common Ground (DTC-03j, page 33) and reflected in additional, minor modification SAMM73 (CSD-03: page 85).

**Q5. How would the development of improved digital communications as per Policy STC9 help to achieve net zero in Exeter by 2030?**

- 4.40. The provision of high-quality digital communications will enable greater volumes of data and a wider breadth of services to be provided online, more quickly. The provision of services online will reduce the need to travel to access such services and will facilitate home working. This will help to minimise carbon emissions associated with travel.
- 4.41. Improved digital communications will also support emerging sectors as identified in the UK Modern Industrial Strategy<sup>3</sup> to move towards net zero.
- 4.42. The SA has assessed the impact of policy STC9 on the climate change SA objective. It concludes that the policy will have a likely significant positive effect (CSD-07b: table 6.7, page 185).

**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?**

- 4.43. Policies STC7, STC8 and STC9 are justified, consistent with national planning and based on robust up to date evidence.
- 4.44. The policies are positively prepared because they will help to achieve sustainable development through the safeguarding of appropriate transport infrastructure, enabling the relocation of a motorway service area and replacement with employment provision and delivering high speed digital communications.
- 4.45. The policies are consistent with national policy. STC7 is consistent with NPPF paragraph 110c regarding the protection of transport routes and infrastructure. STC8 is consistent with NPPF paragraph 110e regarding the provision of large-scale transport facilities. STC9 is consistent with NPPF paragraph 118 regarding high quality digital infrastructure.
- 4.46. The policies are based on robust and up to date evidence:
- STC7 and the associated safeguarded transport infrastructure are based on discussions with DCC as local transport authority and a range of policy documents including the LCWIP (EVB-STC-03), the Local Transport Plan (EVB-STC-01), the Liveable Water Lane SPD (EVB-S-03), the emerging

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<sup>3</sup> Available at:  
[assets.publishing.service.gov.uk/media/69256e16367485ea116a56de/industrial\\_strategy\\_policy\\_paper.pdf](https://assets.publishing.service.gov.uk/media/69256e16367485ea116a56de/industrial_strategy_policy_paper.pdf)

Teignbridge Local Plan<sup>4</sup> and the Water Lane emergency access and egress route plan (EVB-CC-14a).

- STC8 is based on the emerging GETS: National Highways Operational Assessment (EXM-02t) which sets out the congestion issues forecast at Junction 30.
- STC9 is based on the Greater Exeter Digital Connectivity Strategy (EXM-02x).

4.47. The policies are deliverable and viable:

- STC7 is an enabling policy identifying transport projects which should be safeguarded and there are no viability implications as shown by the LPVA (EVB-IF-01a, page 60). The projects reflect requirements identified in other policy documents which implicitly demonstrates partnership support and therefore deliverability.
- STC8 is a proactive, enabling policy which sets out in-principle City Council support for replacing the MSA. This is not a policy requirement and will not impact on the viability of required and allocated development, as shown in the LPVA (EVB-IF-01a, page 60). Delivery of a replacement MSA will rely on partnership working. There were no Regulation 19 objections which the City Council has not addressed through suggested modifications.
- STC9 requires the provision of high-quality digital infrastructure. This is readily provided by digital communication providers and so is deliverable. The Local Plan Viability Assessment shows that the provision of this infrastructure is a standard development cost without viability implications (EVB-IF-01a, page 60).

**Q7. Are policies STC7, STC8 and STC9 positively prepared, justified, effective and consistent with national planning policy?**

4.48. Policy STC7 is positively prepared, justified, effective and consistent with national planning policy:

- The policy will enable sustainable development and so is positively prepared.
- The policy is justified because it appropriately safeguards infrastructure to support active and public transport as well as safe access and egress for Water Lane. The projects are justified because they are derived from transport strategy documents, discussions with DCC as local transport authority and access and egress discussions with the Environment

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<sup>4</sup> Available at: <https://www.teignbridge.gov.uk/media/vqui5k4s/csd-001-local-plan-2020-2040-proposed-submission-addendum.pdf>

Agency and the associated Water Lane Access and Egress Route Plan (EVB-CC-14a).

- The policy is effective because the infrastructure projects included are deliverable or, if more aspirational, their safeguarding will enable the potential future delivery of improved sustainable transport without having negative impacts in the short to medium term.
- The policy is consistent with national planning policy because it identifies and pursues opportunities for walking, cycling and public transport (NPPF: paragraph 108b) and it identifies and protects routes for widening transport choice (NPPF: paragraph 110c).

4.49. Policy STC8 is positively prepared, justified, effective and consistent with national planning policy:

- The policy provides support for employment development on the site of the MSA subject to other matters being addressed. This could also potentially help to enable development elsewhere in the sub-region in accessing Exeter at Junction 30 of the M5. On this basis it is positively prepared.
- The policy is justified because the principle of an alternative MSA has been discussed with National Highways and DCC and it is understood that they are broadly comfortable with the concept subject to further transport assessment, the provision of a replacement facility and, in the case of National Highways, suggested modification SAMM73 (CSD-03: page 85).
- The policy is effective because it provides high-level support for the redevelopment of the MSA without relying on it coming forward.
- Policy STC8 is consistent with national policy as it would support the delivery of development on brownfield land (NPPF: paragraph 123) and provide for large-scale transport facilities (NPPF: 110e). The policy has been discussed with relevant partners (NPPF: 110b).

4.50. Policy STC9 is positively prepared, justified, effective and consistent with national planning policy:

- The policy is positively prepared because it will support the delivery of high-quality digital communication infrastructure alongside development which meets needs.
- The policy is justified because it is informed by the Greater Exeter Digital Connectivity Strategy (EXM-02x).
- The policy is effective because it will enable sustainable development to be accompanied by high-speed digital infrastructure which will support housing delivery, commercial development and the provision of online services for community benefit. There is also a joined-up approach to this provision with Teignbridge District Council including an equivalent policy in their emerging local plan which has been accepted as set out in the

recent Inspectors' Report (Policy EC8<sup>5</sup>) and is based on consistent evidence.

- The policy is consistent with national policy because it will support high quality digital infrastructure which is essential for economic growth and social well-being (NPPF: paragraph 118).

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

- 4.51. Yes. One main modification is suggested in the Schedule of suggested modifications (CSD-03).
- 4.52. Main modification SMM66 is suggested to policy STC7, to safeguard land for widening the A377 on the southwest edge of the city (CSD-03, page 27). This is necessary for soundness as it will support development to be allocated in the Teignbridge Local Plan as set out in the Inspectors' Report (paragraph 285). National Highways support this suggested modification as set out in the Statement of Common Ground (DTC-03j: page 32).
- 4.53. There are no suggested main modifications to policies STC8 or STC9.
- 4.54. There is one additional minor modification suggested to policy STC8 – SAMM73 (CSD-03: page 85). This is addressed under question 4 above.

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<sup>5</sup> Available: [planning-inspectors-report-on-the-teignbridge-local-plan-examination-24-march-2026.pdf](#) . Paragraph 184.

## **5. Summary**

- 5.1. This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to Matter 10 of the Exeter Plan Examination.
- 5.2. All questions associated with Matter 10 have been answered.