

Exeter Local Plan

Examination

**Matter 3: Spatial Strategy and Distribution of
Development**

Date at Examination: 5th March 2026

Devon County Council Position Statement

11th February 2026

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1. Introduction

1.1. Purpose of this Statement

- 1.1.1. This statement has been prepared to answer the questions and address the associated issues as posed by the Planning Inspectors in relation to Matter 3 of the Exeter Local Plan (2022-2042) Examination.
- 1.1.2. This statement relates to Issue 1 questions 5, 10, 11 and 12 of Matter 3 (Spatial Strategy and Distribution of Development).
- 1.1.3. It should be noted that this statement does not cover all of the questions raised by the Planning Inspectors in relation to Matter 3, but focuses upon those where Devon County Council (DCC) has a specific interest in order to fulfil its statutory responsibilities, in this case regarding the County Council's role as Highway Authority.

2. Questions

2.1. Issue 1 Question 5

Is the broad distribution of growth (as set out in Policies S1 and S2 and as shown on the key diagram), consistent with paragraph 109 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

- 2.1.1. As set out in the Transport Empirical Data Report (EVB-STC-08a), Exeter is a compact city with comprehensive coverage by bus, the convergence of five railway lines and a developing active travel network.
- 2.1.2. Furthermore, the 2025 Exeter Transport Strategy - Transport Empirical Data Report (EVB-STC-08a) demonstrates that of residents living within Exeter, 72% travel less than 5km to work, with a further 10% travelling less than 10km to work. These are distances that lend themselves to sustainable journeys. This would suggest that growth within Exeter would lend itself to sustainable journeys given the compact nature of the city and confluence of a range of transport modes mentioned above.
- 2.1.3. The distribution of growth across the city aligns well with the transport network. For instance, the strategic mixed-use brownfield site of Water Lane is located adjacent to a number of routes identified in the Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) (EVB-STC-03), connecting to the Exe Estuary Trail and onwards to key destinations such as the city centre and Marsh Barton.

- 2.1.4. The Chapter 4: Spatial Strategy, paragraph 4.4, page 16 of the Local Plan (CSD-02) highlights that a key change from the Core Strategy (SUP-DPD-01) has been to move away from large, greenfield urban extensions on the edge of the city to the new focus on brownfield development. In transport terms, this means co-location of development where transport networks are already present and facilities are likely to already exist for new residents, minimising the need to travel long distances and maximising the choice of modes for new residents.
- 2.1.5. DCC has worked closely with Exeter City Council to identify opportunities to ensure that development is located where sustainable journeys are a genuine option and inform where further investment is needed to make this a reality.

2.2. Issue 1 Question 10

Does the approximate distribution of new housing and employment development appropriately reflect transport opportunities and constraints?

- 2.2.1. DCC considers that the approximate distribution of new housing and employment development appropriately reflects existing and planned transport opportunities and constraints. Development is generally well distributed across the city and is focused along key arterial routes where access to public transport, including frequent bus services and rail connections, is strongest. This approach supports sustainable travel choices and helps to minimise additional pressure on constrained parts of the highway network.
- 2.2.2. The location of growth areas also aligns with the LCWIP (EVB-STC-03), enabling active travel routes to be delivered or improved alongside development. This ensures that walking and cycling infrastructure can be enhanced early, improving connectivity and reducing reliance on private car travel.
- 2.2.3. Where existing transport constraints are identified, the delivery strategy is ambitious and supported by developer contributions. Subject to securing appropriate funding through Section 106 agreements and where needed other external funding sources, targeted improvements can be made to upgrade and enhance existing transport infrastructure, mitigating the impacts of new development. This is evident in the approach to Policy SBA1 (Water Lane). Furthermore, Policy STC7 (Safeguarding transport infrastructure) identifies land and structures which are needed to facilitate sustainable transport or support the large development allocations in the plan. the county council is committed to working in partnership with the city council to develop these projects and assist in their delivery, where appropriate.

- 2.2.4. Recent strategic approvals further demonstrate this coordinated approach, including Devon County Council Cabinet approval of the Boniface Trail (January 2026)¹, which will strengthen east–west active travel connectivity. In addition, the Clyst Road and Newcourt Road Transportation Access Strategy (EVB-STC-18) identifies proposals to mitigate the transport impacts arising from development in the Topsham and Newcourt area of Exeter.

2.3. Issue 1 Question 11

Would an alternative distribution within the Plan area of the same amount of new development be likely to have significantly less impact on the strategic road network?

- 2.3.1. To assess the impact of the proposed Local Plan development on the Strategic Road Network, modelling of the Greater Exeter area has been progressed in conjunction with National Highways and relevant City/District Councils. The results of this work are detailed in a number of evidence base documents:
- EVB-STC-05: Greater Exeter Strategic Modelling Report: Devon County Council
 - EVB-STC-06: Greater Exeter Modelling Update: Forecasting Report
 - EVB-STC-07: Exeter only model update report
 - EVB-STC-12a: Greater Exeter Further Modelling Technical Note: Main Report
 - EVB-STC-12b: Greater Exeter Further Modelling Technical Note: Appendix A
 - EVB-STC-12c: Greater Exeter Further Modelling Technical Note: Appendix B
 - EVB-STC-12d: Greater Exeter Further Modelling Technical Note: Appendix C
 - EVB-STC-12e: Greater Exeter Further Modelling Technical Note: Appendix D
 - EVB-STC-13a: Greater Exeter Model Update: Exeter only – Oct 2023
 - EVB-STC-13b: Greater Exeter Model Update: Exeter only – Dec 2024
 - EVB-STC-17: Greater Exeter Transport Study: Mitigation modelling scenario 2 technical note
- 2.3.2. The modelling work detailed in the Greater Exeter Strategic Modelling Report: Devon County Council (EVB-STC-05) demonstrates that the largest increase in flows within the city are on main corridors such as Honiton Road, Alphington Road and the A379. There are increases on the Strategic Road Network, however, these are predominantly attributable to developments in the East Devon area.

¹ Available at: <https://democracy.devon.gov.uk/ieListDocuments.aspx?CId=133&MId=5245&Ver=4>

- 2.3.3. The Exeter only model update report (EVB-STC-07) shows the impact of Exeter developments on the local road network. Table 1, pages 1 and 2, shows the quantum of development assumed, with the largest being Marsh Barton, Water Lane and East Gate attributing over half of the assumed dwellings. Notably, these sites are located in close proximity to the city centre and have a range of sustainable transport options which will encourage low vehicle trip rates to be generated. Whilst the strategic road network sees an increase of approximately 200-300 vehicles per hour in peak periods between M5 J29-31 and on the A30, moving the distribution of sites to an alternative spread across the city would likely result in developments moving away from the sites that have the best sustainable transport offerings and closer to access to the Strategic Road Network, increasing the likely vehicular trips generated.
- 2.3.4. It should also be noted that the majority of development sites are on or near arterial routes, offering alternative travel options, and strategic developments are proposed to be low car. Table 4.6, page 25 of the Exeter Transport Strategy – Transport Empirical Data Report (EVB-STC-08a) shows that self-containment within the city is strong, with Census data indicating that approximately 50% of the working population both live and work in Exeter (minimising the potential for trips to work on the Strategic Road Network) and that the sustainable mode share is high within the city.
- 2.3.5. Overall the proposed distribution is considered to be a good balance, utilising brownfield sites close to the city centre, existing transport networks or key destinations and facilities. Whilst the impact on the Strategic Road Network is a matter for National Highways to consider, DCC's view is that the modelling demonstrates an acceptable impact on the Strategic Road Network and an alternative distribution would likely reduce the transport sustainability.

2.4. Issue 1 Question 12

For the plan to be sound, is it necessary for there to be additional evidence, at this stage, of the likely impacts of the new development proposed in the plan on junctions 29, 30 and 31 of the M5 and on the A30, A38 and A379 roads?

- 2.4.1. The Greater Exeter Transport Study carried out strategic highway modelling on the network in and around Exeter, including the Strategic Road Network. Details of this modelling are included in the Greater Exeter Modelling update: Forecasting report (EVB-STC-6), the Greater Exeter Further Modelling Technical Note: Main report (EVB-STC-12a) for the no mitigation scenario, the Greater Exeter Transport Study: Mitigation modelling scenario 2 technical note (EVB-STC-17) for the mitigation scenario and the Greater Exeter Model Update Exeter only Oct 2023 and Dec 2024 (EVB-STC-13a&b) for the Exeter only development.

- 2.4.2. This showed that despite some congestion and delays occurring at J29 and J31 of the M5 and the Ide junction of the A30, this was primarily as a result of development proposals in Teignbridge and East Devon as opposed to Exeter. The acceptability of this will be a matter for National Highways and considered as part of Local Plans for those districts. With the larger proposed sites within the Exeter Local Plan being low car sites, the impact on the highway network as a result of the Exeter development is considered to be minimal. This is shown in the Greater Exeter Model Update Exeter only Dec 2024 (EVB-STC-13b), that only the M5 between J31 and J29, A38 south of J31 and A30 west of J31 increase by over 150 vehicles when all development proposed within the Exeter Plan: Publication Plan (Regulation 19) (CSD-02) is fully occupied. The report identifies that this will not have a significant impact on the highway network.
- 2.4.3. Increases on the A379 are predicted to be less than 50 vehicles per hour in the peak periods which will have little impact on this road corridor. Therefore, Devon County Council does not consider that additional evidence is required at this stage. Transport assessments that support the planning applications for the proposed development will be expected to include detailed assessments of the impact on the highway network.
- 2.4.4. Whilst the modelling undertaken shows that the impact of the proposed development is considered to be acceptable, it is also expected that any increase in congestion or delay will further encourage behaviour change arising from users of the Strategic Road Network; this could include peak spreading, modal shift and reduction in travel (such as working from home). This is an important assumption as part of a vision and validate approach to transport planning and moving away from predict and provide.