

Exeter Local Plan

Examination

Matter 9: Site Allocations

Date at Examination: 12th March & 11th May
2026

Devon County Council Position Statement

11th February 2026

Devon County Council
County Hall
Topsham Road
Exeter
Devon
EX2 4QD



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 9 of the Exeter Local Plan (2022-2042) Examination.
- 1.1.2. This statement relates to Issue 1 question 3; Issue 2 (Generic Questions) question 6; Issue 2 (Policy SBA1) questions 5, 8, 10, 11 and 12; Issue 2 (Policy SBA2) questions 6 and 8; Issue 2 (Policy SBA3) questions 6, 7 and 9; Issue 2 (Policy SBA4) questions 3 and 4; Issue 2 (Policy SBA5) questions 4 and 5; and Issue 3 questions 4, 5 and 6 of Matter 9 (Site Allocations).
- 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 9, but focuses upon those where Devon County Council has a specific interest in order to fulfil its statutory responsibilities as Education Authority and Highways Authority.

2. Issue 1 Questions

2.1. Issue 1 Question 3

How did the Council consider the infrastructure requirements of the growth proposed in the Plan and how did this inform the site selection process?

- 2.1.1. Overall DCC engaged with the city council over settlement strategy and site allocation throughout the local plan preparation process. This included consideration of education infrastructure and transport/highways requirements (discussed further below), throughout the site selection process.
- 2.1.2. For education infrastructure this took into account the county council's Evidence Base Report: 0-25 Education (EVB-IF-08), Education Infrastructure Plan (EIP) (2016-2023) (EXM-02i), Education Approach for Securing Developer Contributions (2021) (EVB-IF-10) and the Department for Education Area guidelines for mainstream schools Building Bulletin 103 Guidance¹.

¹ Available at: [Area guidelines for mainstream schools](#)

- 2.1.3. Strategic allocations SBA1, SBA3 and SBA5 benefited from early and sustained engagement between county and city council officers, and developers beginning at the inception of master planning. This approach ensured that transport mitigation measures were robust, deliverable and policy compliant, and aligned with national guidance, including the National Planning Policy Framework (NPPF 2023) and Local Transport Note 1/20 Cycle infrastructure design (LTN1/20)² with a clear emphasis on prioritising sustainable modes and minimising reliance on the private car. For Water Lane, this requirement was also addressed through detailed transport appraisal and the supporting Liveable Water Lane Supplementary Planning Document (SPD) (EVB-S-03). In accordance with Policy S2, all strategic allocations must be accompanied by a masterplan or design code and, when appropriate, DCC will request this considers the transport implications of each site.
- 2.1.4. Growth within Exeter and adjoining districts is supported by a programme of strategic transport infrastructure improvements set out in the Infrastructure Delivery Plan (IDP) (EFB-IF-02a). These are coordinated through the adopted Devon and Torbay Local Transport Plan 4, 2025-2040 (EVB-STC-01) which provides a comprehensive county wide framework for transport investment and network management, not just related to Exeter, ensuring a joined up approach to addressing cumulative and cross boundary transport impacts.
- 2.1.5. The IDP (EFB-IF-02a) has been developed over a number of years through an iterative process, informed by ongoing partnership working including with Exeter City Council. It was used to inform site selection from an early stage, ensuring that only sites with a clearly identified and deliverable plan for access and mitigation were progressed. This was based on either existing network capacity or planned infrastructure improvements to be funded through developer contributions and/or grant funding applications.

3. Issue 2 Questions

3.1. Issue 2 Question 6 (Generic Questions)

Are Policies SBA1 to SBA5 sufficiently flexible for them to be effective?

- 3.1.1. DCC considers policies SBA1 to SBA5 to be sufficiently flexible for them to be effective.

3.2. Issue 2 Question 5 (Policy SBA1 – Water Lane)

Is the policy sufficiently clear in terms of what types and quantities of housing will be provided? Is Policy SBA1 effective in this regard?

- 3.2.1. DCC considers that the policy wording is sufficiently clear that a 70-unit extra care housing scheme is required.

3.3. Issue 2 Question 8 (Policy SBA1 – Water Lane)

² Available at: [Cycle Infrastructure Design. Local Transport Note 1/20. July 2020](#)

What effect will the allocation have on the safe and efficient operation of the highway network?

- 3.3.1. Currently the site is a mixed-use site that has a significant level of vehicle movements that is also relied upon heavily to provide parking for the surrounding businesses. This allocation is to be a low car development with changes made to allow for bus movements by providing an additional route under the railway line and opening another arch to allow for this so that end users of the development will benefit from this.
- 3.3.2. With the allocation being low car, Policy SBA1 requires provision of mobility hubs. The Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) (EVB-STC-03) has identified key routes through the development and wider to allow for movements for Non-Motorised Users (NMUs) to key employment sites such as the hospital. As there are no significant requirements for highway network infrastructure upgrades there is a reliance on securing contributions for LCWIP schemes and other sustainable travel modes to access the city. The mobility hubs will offer car hire options for the users as well as more access to bicycle storage to ensure that this is utilised as a way to travel to the city.
- 3.3.3. The current lawful use is likely to generate more vehicle movements than the proposed Water Lane development as there will be limited car parking made available within the site, with more opportunities to use sustainable travel options. Page 92 of the Liveable Water Lane SPD (EVB-S-03) states that Haven Road is not suitable for general vehicular access for new development and therefore no additional traffic will be generated via Haven Road. This means it will maintain a safe and efficient operation of the highway as a key route for people walking and cycling as referenced in the Exeter LCWIP route E14 (EVB-STC-03 pg. 38).

3.4. Issue 2 Question 10 (Policy SBA1 – Water Lane)

Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements?

Education

- 3.4.1. The Exeter Plan Evidence Base Report (0-25 Education) (EVB-IF-08) sets out the methodology and evidence used by Devon County Council to determine the education requirements of the Exeter Local Plan (2022–2042). The education requirements identified directly relate to the impact of the planned development on education provision.

- 3.4.2. The Exeter Plan policies and the IDP (EVB-IF-02a) outline how the impact of development will be mitigated through developer contributions and the delivery of new education infrastructure. As stated in the Exeter Plan Evidence Base Report (0-25 Education) (EVB-IF-08), education infrastructure requirements are underpinned by the policies and principles as set out in the approved Devon County Council's Education Infrastructure Plan (EIP) (2016-2023) (EXM-02i) and the Education Approach for Securing Developer Contributions (2021) (EVB-IF-10). Support for Devon County Council's requests for Section 106 developer contributions (as referenced in paragraph 15.24 of the Exeter Plan) and the early identification of education infrastructure requirements will assist Devon County Council in delivering a sustainable pattern of sufficient education provision in Exeter in order to meet its statutory duty.
- 3.4.3. As set out in the Exeter Plan Evidence Base Report (0-25 Education) (EVB-IF-08), development at Policy SBA1 will be required to contribute towards education infrastructure, including the requirement for a new 2-form entry primary school and early years provision located on the Water Lane allocation. Land for the new school should comply with Department for Education Area guidelines for mainstream schools Building Bulletin 103 Guidance, or any successor guidance, to ensure that the school land is of a sufficient size to deliver a suitable learning environment which is affordable for Devon County Council to deliver. SMM93 of the Exeter Plan schedule of suggested modifications (CSD-03) provides the additional assurance required to overcome the county council's previous concerns and ensure that the policy complies with government guidance. In addition, it is clear in the Education Approach for Securing Developer Contributions (2021) (EVB-IF-10) that the school land should be transferred at nil cost to the Education Authority as it is only required to support this development.
- 3.4.4. As set out in the Exeter Plan Evidence Base Report (0-25 Education) (EVB-IF-08), the Education Approach for Securing Developer Contributions (2021) (EVB-IF-10) and the IDP (EVB-IF-02a), education contributions will also be sought from SBA1 to expand existing secondary school provision within the Exeter City boundary. In addition, as the development is more than 150 dwellings, contributions will be required from development towards Special Education Need (SEN). These requirements are specified in Part C.viii of Policy SBA1 as amended under SMM93 (page 41 of CSD-03).
- 3.4.5. Overall, with the additional wording of SMM93 (page 41 of CSD-03) included, DCC considers Policy SBA1 Parts C.vii and C.viii are sufficiently clear about what is expected of planning applications regarding education infrastructure requirements.

Transport Planning

- 3.4.6. DCC considers that Part E of Policy SBA1 and the Liveable Water Lane SPD (EVB-S-03) set out sufficiently clear and detailed requirements for the transport infrastructure to deliver low car development at Water Lane.

3.5. Issue 2 Question 11 (Policy SBA1 – Water Lane)

Are the requirements set out in Policy SBA1 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?

- 3.5.1. The county council consider the requirements set out in Policy SBA1 are justified, consistent with national planning policy and based on robust, up to date evidence.

3.6. Issue 2 Question 12 (Policy SBA1 – Water Lane)

What is the justification for the suggested modifications to the Policy SBA1 and its supporting text? Why are they necessary for soundness?

Adult Social Care

- 3.6.1. The pending applications 23/1007/OUT (proposing 976 homes and 320 purpose built student accommodation) and 22/1145/FUL (proposing 184 co-living and 239 apartments) do not identify any extra care housing provision. The county council's Regulation 19 response raised concern that there is uncertainty of whether the necessary extra care housing will be delivered on the remaining land to come forward at Water Lane. The county council supports the Suggested Additional Modification SAMM111 of CSD-03 as it shows a proactive approach to ensure extra care housing is delivered at Water Lane in accordance with Policy SBA1. Additionally, it is considered that SAMM111 provides further reinforcement for W06 in the Liveable Water Lane Supplementary Planning Document (July 2024) (EVB-S-03).

Education

- 3.6.2. DCC supports the modifications outlined under SMM94, page 41 of CSD-03 as outlined in the response to Issue 2 Question 10 above. The county council also supports the modifications outlined under SAMM111, page 110 of CSD-03.

Transport Planning

- 3.6.3. Exeter Civic Society has suggested that the policy should include reference to the provision of, or contributions towards, local highway infrastructure improvements. Exeter City Council has proposed a potential modification (SMM89 of CSD-03) to include additional local highway infrastructure within the policy. Subject to further site specific discussions, Devon County Council has no objection to this in principle. Given the policy emphasis on active travel at the Water Lane development, it is important that infrastructure provision is clearly focused on supporting sustainable modes and maximising travel choice. Any highway improvements should therefore support mode shift and network efficiency, rather than solely increasing vehicular capacity, which could undermine the policy's wider sustainable transport objectives.

3.7. Issue 2 Question 6 (Policy SBA2 – East Gate)

Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as police infrastructure?

- 3.7.1. The county council considers that Policy SBA2 makes clear the expectations of applications for planning permission in respect of additional infrastructure requirements such as transport and educational infrastructure and contributions towards such infrastructure. The details within the IDP (EFB-IF-02a) also identifies to developers the expectations placed on development and the means by which those expectations will be met.

3.8. Issue 2 Question 8 (Policy SBA2 – East Gate)

Are the requirements set out in Policy SBA2 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?

- 3.8.1. The county council considers the requirements set out in Policy SBA2 are justified, consistent with national planning policy and based on robust, up to date evidence.

3.9. Issue 2 Question 6 (Policy SBA3 – Red Cow)

How have proposals for the site (either through the approval of planning permission or allocation in the Local Plan) considered impacts on existing level crossings?

Transport

- 3.9.1. Policy SBA3 sets out that the allocation will be a low-car development. This will help to mitigate the impact on the existing level crossing. This is similar to other existing developments of a similar type in the city. The site is also in a location with good links to public transit options such as the railway station, bus routes, along with access to the LCWIP routes in the city that would help promote the movement of Non-Motorised Users rather than Single Occupancy Vehicle use.
- 3.9.2. When any part of the Red Cow Site (SBA3) comes forward, planning applications will need to assess the detailed impact of the development on the level crossing and to ensure that appropriate mitigation is secured. The county council would also encourage early pre-application discussions to ensure the necessary Transport Assessment for the site is prepared on a masterplan basis to achieve the intended low car benefits from the development. It is considered that suitable mitigation can be secured to address any site specific impacts on the existing level crossing.

3.10. Issue 2 Question 7 (Policy SBA3 – Red Cow)

Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as railway crossings?

- 3.10.1. The county council considers that Policy SBA3 makes clear the expectations of applications for planning permission in respect of additional infrastructure requirements such as transport and educational infrastructure and contributions towards such infrastructure.
- 3.10.2. The IDP (EVB-IF-02a) has identified a need for a contribution towards local highway improvements on the A377 and the level crossing. This would be secured through S106/CIL contributions. Together, the policy and the IDP (EVB-IF-02a) provide certainty to developers, both the expectations placed on development and the means by which those expectations will be met.

3.11. Issue 2 Question 9 (Policy SBA3 – Red Cow)

Are the requirements set out in Policy SBA3 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?

- 3.11.1. The county council considers the requirements set out in Policy SBA3 are justified, consistent with national planning policy and based on robust, up to date evidence.

3.12. Issue 2 Question 3 (Policy SBA4 – Exe Bridges Retail Park)

Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements?

- 3.12.1. The county council considers that Policy SBA4 makes clear the expectations of applications for planning permission in respect of additional infrastructure requirements such as transport and education infrastructure and contributions towards such infrastructure. The details within the IDP (EVB-IF-02a) also identifies to developers the expectations placed on development and the means by which those expectations will be met.

3.13. Issue 2 Question 4 (Policy SBA4 – Exe Bridges Retail Park)

Are the requirements set out in Policy SBA4 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?

- 3.13.1. The county council considers the requirements set out in Policy SBA4 are justified, consistent with national planning policy and based on robust, up to date evidence.

3.14. Issue 2 Question 4 (Policy SBA5 – South Gate)

Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as education?

- 3.14.1. The county council considers that Policy SBA5 makes clear the expectations of applications for planning permission in respect of additional infrastructure requirements such as transport and educational infrastructure and contributions towards such infrastructure.
- 3.14.2. Policy SBA5, Part C.ii specifically refers to education contributions to support additional early years, primary, secondary and special educational needs (SEND) provision. These contributions will mitigate the impact on education infrastructure that the development will have.

3.15. Issue 2 Question 5 (Policy SBA5 – South Gate)

Are the requirements set out in Policy SBA5 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?

- 3.15.1. The county council considers the requirements set out in Policy SBA5 are justified, consistent with national planning policy and based on robust, up to date evidence.

4. Issue 3 Questions

4.1. Issue 3 Question 4

Is the need for the TIDF justified, consistent with national planning policy and based on robust, up to date evidence?

- 4.1.1. The county council considers that the need for the TIDF and cross boundary/ partnership working is justified, consistent with national planning policy and based on robust, up to date evidence.

4.2. Issue 3 Question 5

Are the requirements set out in Policy TI1 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?

- 4.2.1. The county council considers the requirements set out in Policy TI1 are justified, consistent with national planning policy and based on robust, up to date evidence.

4.3. Issue 3 Question 6

How would the TIDF guide development proposals in Topsham over the plan period? Is it clear to decision-makers, developers and local communities what will be provided and where across the area? Is the policy sufficiently clear in terms of what types and quantities of development, infrastructure and facilities will be provided? Is Policy TI1 effective in these regards?

Education

- 4.3.1. Pages 74 and 75 of the East Devon Local Plan Second Regulation 19 Publication Draft November 2025³ includes Strategic Policy WS10 relating to 'Development next to the M5 and north of Topsham' (an extract showing Policy WS10 is contained in Appendix 1 of this statement). Policy WS10 safeguards 1.8 hectares of land for education purposes to provide the option for primary education infrastructure on site. This provides an option for additional school places through the delivery of a new primary school which could in part serve Exeter development given the cross-border location. Exeter Plan Policy TI1 includes wording for 'timely delivery and funding of infrastructure and facilities including primary education' and would be supported by the proposed TIDF. Devon County Council would work proactively with Exeter City Council on the production of the Topsham Infrastructure Delivery Framework.

Transport

- 4.3.2. The Clyst Road and Newcourt Road Transportation Access Strategy (EVB-STC-18) supports the objectives of Policy TI1 by providing a clear and coordinated framework for the delivery of strategic transport infrastructure across development areas within both Exeter City Council (ECC) and East Devon District Council (EDDC). Policy TI1 seeks to ensure that development is supported by timely, appropriate, and proportionate transport infrastructure, delivered through collaboration between relevant authorities and stakeholders.
- 4.3.3. In this context, the Clyst Road and Newcourt Road Transportation Access Strategy (EVB-STC-18) demonstrates a practical mechanism for cross-boundary working by identifying the required highway links that enable movement between development allocations, particularly connections from the EDDC allocation towards Topsham. This directly aligns with the intent of TI1, which recognises that the impacts of strategic development extend beyond administrative boundaries and therefore require a coordinated response.
- 4.3.4. The strategy provides clarity on the nature, location, and function of the highway infrastructure required to support development, allowing developers in both ECC and EDDC areas to clearly understand the expectations placed upon them. By setting out the access requirements at an early stage, it ensures that development proposals can be designed in a manner that is consistent with the wider strategic transport network, as envisaged by Policy TI1.

³ Available at: [East Devon Local Plan Second Regulation 19 Version](#)

- 4.3.5. Furthermore, while the TIDF has yet to be fully agreed by all parties identified within Policy T11, the Clyst Road and Newcourt Road Transportation Access Strategy (EVB-STC-18) operates as an effective interim evidence-based tool. It demonstrates the scale and type of infrastructure likely to be required, thereby supporting the implementation of T11 by avoiding delay in the consideration of development proposals and ensuring that transport impacts are appropriately addressed.
- 4.3.6. Overall, the Clyst Road and Newcourt Road Transportation Access Strategy (EVB-STC-18) gives effect to Policy T11 by translating its high-level objectives into a deliverable and consistent approach to highway infrastructure provision. It supports informed decision-making, provides clarity to developers, and reinforces the collaborative approach to transport planning that Policy T11 seeks to achieve. It is essential that the TIDF is consistent with and builds upon the Clyst Road and Newcourt Road Transportation Access Strategy (EVB-STC-18).

Appendix 1: Extract of the East Devon Local Plan 2020 to 2042 – Second Regulation 19 Publication Draft showing Policy WS10

East Devon Local Plan 2020 to 2042 – Second Regulation 19 Publication Draft

Development north of Topsham and east of the M5 Motorway

- 4.44.** Taking advantage of proximity to Exeter and links with Topsham, land is allocated for an urban extension north of Topsham.

Strategic Policy WS10: Development next to the M5 and north of Topsham

Land shown on the Policies Map is allocated in East Devon for an urban extension to the north of Topsham to accommodate mixed use development including:

- A. Around 596 new homes;
- B. 2.4 hectares of employment land;
- C. 1.8 hectares of land safeguarded for education purposes to provide the option for primary education infrastructure on site. Additional education provision for early years, primary, and secondary and pupils with special educational needs and disabilities is required to support this development. and
- D. Supporting infrastructure, green spaces and links to the CVRP and supporting and delivery of onsite habitats that reflect and link into the adjacent Priority Habitat - Coastal and floodplain grazing marshes.

The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development.

This Masterplan will also need to be developed in conjunction with joint work between Exeter City Council and EDDC on a formal **Development and Infrastructure Delivery Framework** which is required to ensure development and infrastructure needs on the edge of Topsham, in the Exeter City Council area, and the adjacent allocation North of Topsham, in East Devon, progress in a coordinated cross-boundary manner.

The delivery framework will include:

East Devon Local Plan 2020 to 2042 – Second Regulation 19 Publication Draft

- A. The timely delivery and funding of a range of infrastructure and facilities including primary healthcare, indoor space for community use, sport and recreation and GI to meet the needs from development in Exeter and East Devon;
- B. A comprehensive transport strategy to prioritise active travel and public transport; and
- C. The need to respect Exeter's landscape setting area and the CVRP.

The Delivery Framework will be produced jointly by EDDC and the City Council working with partners including landowners, developers, Devon County Council, National Highways, the Environment Agency, Natural England, the NHS, community groups and Clyst St George Parish Council.

Through a transport assessment the traffic impacts of development of the site will need to be assessed in conjunction with the cumulative impacts that will also arise from development of Marcombe, and other new developments. Mitigation measures will need to be designed and agreed, to come forward in parallel with or prior to development to address adverse impacts, specifically including in respect of the M5 J30 (Sandygate Roundabout) and Clyst St Mary Roundabout.

Planning permission will not be granted for any individual parcel of land in the allocation in the absence of a comprehensive development scheme with clear mechanisms outlined for full policy requirements to be met and delivered.

This policy does not apply in the Cranbrook Plan area

- 4.45.** Land near Exeter, south of Junction 30 and to the east of the M5, offers an opportunity for new mixed-use development, accommodating around 596 new homes. Development in East Devon should be planned in the context of East Devon standards as well as city development, with a masterplan addressing development in East Devon and joint work on an IDP across the city boundary.

- 4.45b.** The Clyst Road and Newcourt Road Transportation Access Strategy identifies a range of transport measures required to deliver sustainable growth across the local area, at land in the administrative areas of East Devon District Council and Exeter City Council. Projects in East Devon include a new pedestrian/cycle crossing of the M5 east of Newcourt Station; continuous walking and cycling provision and a new bus service on Clyst Road; and improving active links on Old Rydon Lane between Clyst Road and E9 Cycle Route.