

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm on 6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title	Mr
First Name	Steve
Last Name	Havers
Job Title (where relevant)	Spatial Planner
Organisation (where relevant)	National Highways
Address Line 1	Ash House,
Line 2	Falcon Road,
Line 3	Sowton Industrial Estate
Line 4	Exeter

Post Code

EX2 2LB

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

National Highways believes the preparation of the Local Plan meets the tests of Legal Compliance from the perspective of; engagement; procedure; and content.

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

N/a

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

N/a

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

N/a

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

National Highway's comments are set out in full in the submission letter dated 06/02/2025

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

National Highway's advice is set out in full in the submission letter dated 06/02/2025

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes

X

No

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

National Highways agrees that the Duty to Co-operate was met and is ongoing.

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

N/a

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.

(Continue on a separate sheet if necessary)

N/a

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

N/a

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Yes.

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

To ensure National Highways' position is appropriately represented and can contribute to any modifications necessary to make the Plan sound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>

Our ref:

George Marshall
Assistant Service Lead: Local Plan
Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN

Steve Havers
Spatial Planner
National Highways
Ash House, Falcon Road
Sowton Industrial Estate
Exeter, EX2 7LB

Tel: [REDACTED]

6 February 2025

Sent by email: planning.policy@exeter.gov.uk

Dear George

The Exeter Plan – Regulation 19 Consultation Draft (December 2024)

1. Further to the publishing of the Regulation 19 Consultation Draft of The Exeter Plan 2021-2041 on 12 December 2024, National Highways write to provide comments relating to the soundness of the Publication Plan, and to make recommendations for areas in which the plan and associated policies should be strengthened from the perspective of protecting the Strategic Road Network (SRN).
2. The advice set out in this letter should be read alongside the Standard Representation Form that provides for the formal logging of National Highways' comments to this consultation.
3. On behalf of the Secretary of State for Transport, National Highways is responsible for operating, maintaining and improving the Strategic Road Network (SRN). Our approach and input to plan making is specified by Department for Transport (DfT) Circular 01/22 'Strategic road network and the delivery of sustainable development'.

The Strategic Road Network

4. Locally, the SRN comprises the M5 motorway and the A30 and A38 Trunk Roads, with the M5 forming the eastern boundary of the City of Exeter, and the A38 forming the south-western boundary. M5 Junctions 29 (J29) and 30 (J30) are located on the boundary between the Exeter City Council authority area and that of the neighbouring East Devon District Council.
5. The A30 Ide roundabout is located on the boundary between Exeter and the neighbouring Teignbridge District Council authority area. A short distance to the south of the Exeter authority area, Junction 31 (J31) of the M5 forms a key interchange between the motorway and Trunk Road networks, catering for journeys into Teignbridge and West Devon via the A38 and A30 respectively, and for longer distance journeys towards Cornwall. The A38 Peamore junction is located around 1.5 kilometres south of M5 J31 and provides access to the A379, a key route into Exeter from the south. Around two kilometres east of M5 J29 and the Exeter authority area, the A30 Airport junction provides access to Exeter Airport and the neighbouring Exeter & East Devon Enterprise Zone which includes Exeter Science Park and the growing Cranbrook New Community.

6. The section of the M5 that forms the eastern boundary of Exeter is characterised by high traffic demands, particularly during commuter periods, along with Bank Holiday and Summer periods when the SRN is used for wider access to the Devon and Cornwall peninsula for leisure and tourism. The operation of the SRN junctions around Exeter can be closely linked to capacity constraints on the local highway network. This was evidenced in transport modelling work for the A30 Ide roundabout undertaken by Teignbridge District Council to support Examination of their own Local Plan, and is equally relevant for M5 J29 and J30.
7. The Plan highlights that Exeter has the second largest travel to work area in England, with a Functional Economic Market Area (FEMA) consisting of Exeter, East Devon, Mid Devon and Teignbridge. Whilst bus and rail services are available from some areas, with an expanding network of suburban rail stations within Exeter, the SRN is used for vehicular access to the city from the wider FEMA. National Highways will work with Exeter City Council and the wider FEMA authorities to enable future growth, but the challenge will be to maintain a suitable balance between competing travel demands without adversely impacting the safe and efficient operation of the SRN junction.

Policy Context

8. National Highways input to the Local Plan process is guided by the National Planning Policy Framework (NPPF) and DfT Circular 01/2022.
9. Paragraph 26 of the NPPF advises that *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”*. National Highways continues to be engaged with Exeter City Council, neighbouring planning authorities and Devon County Council regarding the preparation of a Greater Exeter Transport Strategy to underpin planned growth. Traffic modelling evidence submitted in support of the Exeter Plan has been developed in consultation with National Highways, and we are continuing to undertake our own operational assessment work for selected SRN junctions to consider the potential cumulative impacts of growth across the Greater Exeter area.
10. The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. Nevertheless, potential significant impacts on the transport network may require highway infrastructure improvements, with the DfT Circular 01/2022 making it clear that *“The policies and allocations that result from plan-making must not compromise the SRN’s prime function to enable the long-distance movement of people and goods”*.
11. Paragraph 29 of the Circular goes on to advise the following in respect of the identification of infrastructure requirements:
New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.
12. In line with the vision-led planning approach now enshrined in national policy, Paragraph 33 of the Circular advises that, *“...The company can review measures that would help to avoid*

or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. A robust evidence-base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon intensive forms of travel”.

13. Work to date on the emerging Greater Exeter Transport Strategy has informed the current Infrastructure Delivery Plan (IDP) (dated December 2024) for the Exeter Plan. However, it is critical that the continuation of this work also informs the future review and update of the Exeter Plan and supporting infrastructure needs, to ensure that the identified level of growth can be realised without significant adverse impacts. Paragraph 34 of the DfT Circular advises that, *“The company’s engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.*

Previous Responses and Ongoing Consultations

14. National Highways has provided comments on previous draft versions of The Exeter Plan and this response seeks only to build upon previous comments and provide an update on our position in light of ongoing work with the stakeholder authorities.
15. A significant level of development is proposed within the emerging Local Plans for the authorities that make up the Exeter FEMA, with the potential to impact upon the safe and efficient operation of the M5, A30 and A38 Trunk Roads. The Plan makes reference to ongoing traffic modelling work to assess the combined impacts of planned growth. The work will underpin the Greater Exeter Transport Strategy and Local Plan delivery for the partner authorities. National Highways continues to be a key stakeholder in this process and is contributing its own modelling for the SRN using a microsimulation model of the M5 and A30. We welcome this effective and on-going joint-working to support the production of a positively prepared and justified strategy. However, it is important to note that this work is ongoing and still to be completed.
16. The Greater Exeter Transport Strategy will include a range of service and infrastructure improvements to promote non-car travel. It is critical that this is forward-looking to the ‘Vision’ for future transport as outlined by central government and interpreted locally through the Local Plans. Following the agreement of measures and their effectiveness, a robust funding and delivery strategy will need to be identified and incorporated into the IDPs for partner authorities which may necessitate updates to the Exeter City Council IDP. There remains a risk that improvements to the SRN or neighbouring local highway junctions could be required to address the residual cumulative impacts of planned growth.
17. Evidence of modelled traffic flows associated with the Exeter Local Plan indicates that there will be material demand for travel through M5 J30. The traffic flow diagrams included within Appendix D of the Greater Exeter Further Modelling Technical Note show that movements generated by Exeter Local Plan allocations will be in the order of 600 vehicles in both the AM and PM peak hours at M5 J30. In the AM peak hour, the modelling work suggests that around 200 extra vehicle trips will use the M5 northbound off-slip. In the PM peak, the majority of extra trips approach the junction from the A379.
18. We have explored these traffic flow increases with Devon County Council and provide further commentary in subsequent sections relating to Housing and Economy & Jobs. The same

traffic flow diagrams also show increases at M5 J29 and J31, along with the A30 Ide roundabout. Growth within the Exeter Plan is indicated to add around 350 vehicle trips to M5 J31 in the AM and PM peak hours, around 200 trips to the A30 Ide roundabout, and 200-300 vehicle trips to M5 J29. Whilst some trips will be travelling to planned development within neighbouring districts, limiting the scale of cumulative growth across the wider area, the forecasts highlight the general uplift in traffic demand across the Exeter travel to work area.

Regulation 19 draft Local Plan Comments

19. We have set out our comments regarding the Regulation 19 Draft version of The Exeter Plan below, broadly following the structure of the published document:

Overarching Principles

20. National Highways recognises the 'Vision' underpinning The Exeter Plan is aligned with the 'Exeter Vision 2040' adopted in 2019. The Vision seeks to deliver a liveable and connected city, leading the way in terms of sustainability and activity levels. The proposed Spatial Strategy is focussed on the redevelopment of brownfield sites close to the city centre and those located on transport routes to minimise the need to travel and facilitate sustainable modes. Further policies (RFC1 and RFC2) seek to protect and enhance the city centre, district centre and local centres thereby helping to reduce the need to travel, and seek to guard against the provision of town centre uses outside of established centres.
21. National Highways consider that the Vision and Spatial Strategy underpinning the Exeter Plan are complementary and welcome the intention to limit the need to travel and support local accessibility to everyday services and facilities. National Highways also supports the ambition to make Exeter a net carbon zero city by 2030 as set out in Strategic Policy CC1. The dual impact of reducing the need to travel and maximising use of sustainable travel modes is particularly welcome given the potential to reduce discretionary travel by car.
22. Whilst the Spatial Strategy seeks to enable traditional and new forms of employment provision within the city, it also commits the City Council to work with neighbouring Councils to ensure that the employment needs of the wider functional area are met. An Economic Development Needs Assessment (EDNA) concluded that some of the future economic growth stimulated by the city will need to be accommodated in adjoining local authority areas. With future employment growth in the city fringe, the SRN will continue to be used for longer distance commuting and out-commuting to the city fringe is likely to become more prevalent. The location of major employment sites on the periphery of the city and to the east of the M5 could also limit the ability to utilise some existing facilities for active and sustainable travel, particularly rail.

Homes

23. The identified housing requirement is to deliver at least 12,840 new dwellings over the 20-year period 2021-2041. Strategic Policy H1 (Housing requirement) targets the delivery of 13,975 new dwellings over the same period, comprising completions and existing consents, proposed allocations and anticipated windfall provision. The targeted housing number and associated impact assessment provides flexibility over delivery and confidence that unforeseen impacts on the SRN will not occur as a result of unallocated sites coming forward.
24. With planning consents in place for 5,289 new dwellings, Strategic Policy H1 seeks to deliver approximately 5,369 new dwellings on site allocations. The site allocations are set out in Strategic Policy H2. Proposed site allocations include Land at Old Rydon Lane, which is capable of accommodating 357 new dwellings, and St Bridget Nurseries which is capable of

accommodating 350 dwellings. Both sites are within the A379 corridor and have the potential to increase traffic volumes via M5 J30. Smaller sites are also proposed for allocation in the Topsham area to the south of the M5 and will increase traffic demand on Clyst Road which meets with the A376 Sidmouth Road a short distance to the east of M5 J30.

25. Coupled with employment proposals adjacent to Sandy Park, the Land at Old Rydon Lane site represents a long-standing development ambition for the Newcourt area, with a planning application (reference 14/1451/OUT) for up to 392 dwellings on the site submitted in 2014. Whilst the application is currently awaiting determination by Exeter City Council, National Highways offered no objection and accepted the development would not have an unacceptable impact.
26. The proposed residential allocations contained in Policy H2 have informed Devon County Council's modelling of the traffic impacts of The Exeter Plan. As previously noted, modelling work suggests material increases in traffic at M5 J30, principally associated with proposed allocations in the A379 corridor. Some of the forecast traffic flow increases at M5 J30 are associated with long-standing development ambitions, with proposed allocations in the Newcourt area carried forward from the current Local Plan and dating back to previous improvements at M5 J30. Nevertheless, with M5 J30 being located on the City Council boundary, the modelling evidence highlights the issue of cross-boundary travel between Exeter and neighbouring authorities.

Economy and Jobs

27. Within the context of the employment land constraints identified within the Spatial Strategy and supporting EDNA, National Highways welcomes the inclusion of Strategic Policy EJ2 (Retention of employment land) which seeks to protect established employment areas from redevelopment for other uses. National Highways also supports the objectives of Strategic Policy EJ3 (New forms of employment provision) which seeks to support the delivery of work hubs, collaborative workspace, and live-work schemes, contributing to a reduction in the need to travel.
28. Strategic Policy EJ6 seeks to allocate three sites for transformational employment development, including 11 hectares of land on sites adjacent to IKEA and Sandy Park within the Newcourt area, accessed from the A379 to the west of M5 J30. Accessibility from M5 J30 is recognised as an attractive opportunity, but National Highways would expect equivalent access by active and sustainable travel modes to prevent against a reliance on the private motor vehicle. We understand that the Sandy Park site is carried forward from the adopted Local Plan. An application (23/1532/OUT) for up to 158 residential dwellings and up to 17,567sqm of commercial floorspace on the allocation site is currently awaiting determination by Exeter City Council. However, National Highways offered no objection to the application, in part due to evidence of reductions in slip road traffic demand at M5 J30 during the traditional commuter peak hours.

Sustainable Transport and Communications

29. It is an objective of the Plan to deliver development in appropriate locations with high quality infrastructure to minimise the need to travel, maximise sustainable transport and support emerging forms of mobility to improve health, placemaking and to support Net Zero. We are supportive of the 'Vision' and Plan objectives, and will continue to work with the City Council and other stakeholder authorities to ensure that the safe and efficient operation of the SRN for longer-distance travel and freight is not compromised by future employment provision in the city fringe.

30. The Plan highlights the role which Exeter plays as a gateway to the national transport network. Draft Strategic Policy STC1 (Sustainable Movement) sets out a series of outcomes required to support the objective to be a Net Zero city by 2030 and to support the sustainable growth and accessibility of Exeter and the wider area. Outcomes include ensuring safe travel, and the protection and enhancement of the function of Exeter as a strategic rail, bus/coach, road and air hub through investment in critical infrastructure and improvements to sustainable connections to these hubs. Given the identified outcomes of the policy, it is suggested that reference could also be made to the delivery of the Greater Exeter Transport Strategy.
31. The recognition of the potential need for physical improvements to the capacity of the highway network is an important element of draft Strategic Policy STC2 (The Transport Hierarchy) and is welcomed by National Highways. The draft policy advises that highway enhancements will only be supported where they do not cause unacceptable harm to the local natural, built or historic environments, and where they are necessary to improve highway safety, reduce car journeys, or where severe impacts cannot be avoided by investment in active and sustainable travel.
32. National highways will continue to work with the FEMA authorities to ensure that the highway impacts of planned development growth are managed as far as practicable through the delivery of active and sustainable travel measures to avoid severe or unacceptable impact on the SRN in line with policy set out in the DfT Circular and NPPF. Where a need for new highway infrastructure is identified as essential, then National Highways will work with the planning authorities and Devon County Council to seek to ensure that necessary infrastructure delivery keeps pace with development build out. **We recommend** this approach should inform future reviews of the Local Plan and should be reflected in references to monitoring transport outcomes and managing the future impacts of cumulative development.
33. Policy STC2 goes on to advise that contributions towards additional or improved transport provision will be sought where necessary. **We recommend** that supporting text should again make reference to the Greater Exeter Transport Strategy. With the Transport Strategy still being developed, there remains uncertainty over funding requirements. Whilst it is recognised that the IDP lists funding sources for currently identified transport improvements, there may well be a need to seek new funding. A commitment to seek funding from external sources where necessary would provide reassurance that identified measures are capable of being delivered and that the financial burden on development will not adversely impact on the provision of wider services and facilities.
34. Strategic Policy STC3 (Supporting Active Travel) seeks to encourage the use of active travel. The policy advises that the City Council will support improvements to the active travel network by addressing severance challenges associated with the SRN. Integrating active travel infrastructure with new employment opportunities delivered beyond the city boundary will be important to minimise out-commuting by car. National Highways would expect to be actively involved in any proposals that involve works to the SRN.
35. Strategic Policy STC4 (Supporting Public Transport) commits the City Council to work with other authorities and stakeholders to support public transport. A number of routes are referred to, including cross boundary services to Exeter Airport. **We recommend** that additional reference is made to cross-boundary service provision and the outcomes of the Greater Exeter Transport Strategy. Car-borne travel by Exeter residents to employment in areas such as Peamore (within Teignbridge) and the Exeter & East Devon Enterprise Area (largely within East Devon) has the potential to adversely impact the SRN. An integrated and ambitious approach is required to deliver a comprehensive public transport offering for these areas and new development that may come forward in the East Devon plan.

36. Strategic Policy STC6 (Travel Plans) requires that all development proposals which generate significant transport impacts should be accompanied by a Travel Plan. It is noted that the adopted wording differs from that set out in paragraph 118 of the NPPF, which refers to development that will generate “...*significant amounts of movement*...”. **We recommend** that the policy wording be amended to refer to significant movements rather than significant impacts given the emphasis on planning for active travel and non-car travel.
37. Policy STC6 goes on to advise that “*Travel Plan measures should be included in an action plan and delivered by the developer or through financial contributions*”. This is welcomed, but the policy contains no reference to monitoring the outcomes of the Travel Plan. **We recommend** that the policy should be strengthened to include a commitment to monitor the travel outcomes of development in line with paragraph 118 of the NPPF, particularly where this may impact on subsequent decisions in respect of transport improvements. The monitoring of transport outcomes is a key requirement for National Highways given the adoption of a vision-led approach and uncertainty over future requirements for highway improvements.
38. Strategic Policy STC7 (Safeguarding Transport Infrastructure) identifies a series of sites, routes, and structures safeguarded for future transport infrastructure. It is noted that the IDP identifies improvements at the A30 Ide roundabout and for the A376 Alphington Road entering the city. Work undertaken by Teignbridge Council identified a potential need to widen the Alphington Road to ease queuing back to the A30 Trunk Road. **We recommend** that Exeter City Council confirm whether land adjoining the Alphington Road corridor should also be safeguarded to accommodate any potential future physical widening.
39. Strategic policy STC8 (Motorway Service Area) gives support to the principle of redeveloping the existing Motorway Service Area (MSA) adjacent to M5 J30 for employment use, subject to the provision of an appropriate replacement. As the redevelopment of the site for employment use has not informed ongoing traffic modelling work the proposal would need to be supported by a full traffic assessment at a future point in time, to demonstrate any additional impacts and associated infrastructure needs not previously accounted for as part of the Greater Exeter Transport Strategy. **We also recommend** that the policy be strengthened to confirm that a suitable replacement MSA would need to be identified and open to traffic prior to any redevelopment.

Infrastructure and Facilities

40. Strategic Policy IF1 (Delivery of Infrastructure) requires the delivery of supporting infrastructure and community facilities, phased at the earliest practical and viable opportunity. It is stated that funding will be sought from the Community Infrastructure Levy and Section 106 Agreements to secure necessary infrastructure, facilities and services, including those identified in an IDP.
41. The Greater Exeter Transport Strategy is not yet finalised. The Strategy will need to inform revisions to the IDP, but there is no certainty that sufficient funding will be available from development to deliver all necessary measures. Should physical SRN works be required then it is likely that additional public funding will be necessary. **We recommend** that the policy should be expanded to refer to the Transport Strategy and seeking other sources of funding as necessary.
42. The potential for changes in infrastructure costs is reflected in Strategic Policy IF2 (Viability) which sets out a requirement for viability assessments and sets a framework for reviewing viability issues. The viability risks identified in Policy IF2 are pertinent given uncertainty over infrastructure costs and the potential need for highway improvements. National Highways supports the approach identified in the policy and would welcome joint-working with the City Council to manage this risk.

43. We would also highlight that the third bullet point of supporting text in paragraph 15.4 makes reference to Highways England, and this should be updated to National Highways.

Site Allocations

44. The Plan includes Strategic Policies for five strategic mixed-use brownfield allocations and the Topsham Infrastructure Delivery Framework. Wider residential allocations and new transformational employment allocations are shown in map form. We would expect any future planning applications for significant development to be supported by a vision-led Transport Assessment/Statement and Travel Plan, detailing the transport vision for the site, monitoring arrangements, and contribution to the overarching transport strategy.
45. Strategic Policy TI1 seeks to establish a delivery framework for new cross-boundary infrastructure to support proposed development north of Topsham within the Exeter and East Devon Local Plans. The policy is welcomed by National Highways, both in terms of the identification of a transport strategy to prioritise sustainable travel, and the proactive cross-boundary planning of future infrastructure requirements. Similar cross boundary considerations are likely to occur for the Peamore site allocation in the Teignbridge Local Plan, and for the Cranbrook and second New Community corridors with East Devon District Council. **We recommend** that the authorities seek to implement similar working arrangements for these areas to minimise any impacts for the SRN.

Monitoring and Implementation

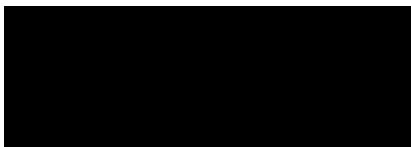
46. As previously noted, we recommend reference to the monitoring of development Travel Plans, particularly given the objectives of the Plan around active travel and reducing the need to travel.
47. It is also unclear how the goal of 50% of trips within the city being taken by active travel will be monitored. We understand that this is a shared ambition with Devon County Council, established within both the Exeter Transport Strategy and Local Transport Plan 4. Currently there is no reference to this ambition within plans to monitor implementation of the Exeter Plan.
48. Similarly, whilst it is welcomed that the plan intends to undertake monitoring of bus and rail patronage in line with Strategic Policy STC4, no wider monitoring of enhancements in service provision or Park and Change use appear to be proposed. Examples of additional monitoring could include the delivery of new/extended bus services or increases in rail service frequency, to demonstrate a qualitative improvement in the public transport offer.

Summary

49. National Highways broadly welcome the overall direction of the Exeter Plan, with a vision to re-use brownfield sites close to the City Centre and maximise active travel and public transport use to reduce overall car use.
50. We acknowledge that due to land availability constraints there is a need to work with neighbouring authorities to deliver future employment opportunities for Exeter residents. Significant development growth is planned across the Exeter travel to work area, with Exeter allocations indicated to result in a material uplift in traffic through M5 J30. We understand that much of this growth has already been accounted for by National Highways as part of previous planning decisions. Nevertheless, the addition of development growth from neighbouring authorities strengthens the need for an ambitious strategy to accommodate future travel demands across the Exeter travel to work area.

51. National Highways is committed to continue working with Exeter City Council, neighbouring planning authorities and Devon County Council on the development of a Greater Exeter Transport Strategy to address the cumulative travel demands of planned development in the Exeter travel to work area. The development of the Transport Strategy will continue to progress ahead of Examination. Whilst work to date has informed the current IDP, subsequent amendments are likely to be required to reflect agreed measures identified as part of the final Transport Strategy. This could include works to the SRN, which would be likely to require additional public funding. Nevertheless, the positive cross-boundary work to date provides confidence that the Plan can be considered sound, subject to the completion of this work and the successful implementation of Transport Strategy outcomes.
52. National Highway therefore recommends that the Exeter Plan should adopt a 'monitor and manage' approach, whereby the outcomes of the Greater Exeter Transport Strategy and implications for the operation of the SRN are monitored going forwards to inform future Local Plan reviews. The Transport Strategy should seek ambitious modal shift and investment in provision for active travel, bus and rail travel, with a view to limiting the need for costly improvements to the SRN which may delay the build-out of planned development growth. We are therefore recommending that policies within the Exeter Plan are updated to include additional references to the Greater Exeter Transport Strategy, uncertainty over required infrastructure improvements and funding, and the need to comprehensively monitor future travel outcomes. These requirements should all inform future reviews of the Local Plan and associated infrastructure planning.
53. We trust that our response is clear regarding the areas of concern and assists with any further amendments to The Exeter Plan prior to Examination in Public. If you require further clarification or wish to discuss any of the above, please do not hesitate to contact us.

Yours sincerely



Steve Havers
Spatial Planner
Email: 