

Filtered Data Export

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:**

1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:**

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

1.1

**1(b). Does your comment relate to one of the changes listed above?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** Further to the publishing of the Second Regulation 19 Publication Draft of The East Devon Local Plan 2020-2042 on 28 November 2025, National Highways write to provide comments relating to the soundness of the Publication Draft, and to make recommendations for areas in which the plan and associated policies can be strengthened from the perspective of protecting the Strategic Road Network (SRN).

2. On behalf of the Secretary of State for Transport, National Highways is responsible for operating, maintaining and improving the SRN. Our approach to plan making is specified by Department for Transport (DfT) Circular 01/22 'Strategic road network and the delivery of sustainable development'.

3. Locally, the SRN comprises the M5 motorway and the A30, A303 and A35 Trunk Roads, with the M5 Junctions 29 (J29) and 30 (J30) located on the boundary between the East Devon District Council authority area and that of the neighbouring Exeter City Council. The section of the M5 that forms the western boundary of East Devon is characterised by high traffic demands, particularly during commuter periods, along with Bank Holiday and Summer periods. M5 J29 and the A30 provide access to the Exeter & East Devon Enterprise Zone, which includes the Exeter Science Park. Around two kilometres east of M5 J29, the A30 Airport junction provides access to Exeter Airport, the SkyPark development and the growing Cranbrook New Community.

4. Our comments set out herein follow previous correspondence dated 28 March 2025 in which we set out our response to the First Regulation 19 Local Plan consultation. As part of the Second Regulation 19 consultation, we note that a 'tracked changes' version of the Publication Draft has been made available for review, alongside additional supporting evidence. We have focussed on this information and the associated 'tracked changes'. Given the structure of the Publication Draft document is unchanged, we have

retained the structure of our March 2025 correspondence. Our comments are based on the published 'tracked changes' and we have not sought to repeat earlier comments in full. Nevertheless, our comments should be read in conjunction with our previous correspondence.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR04

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** We note that changes to Strategic Policy TR04 provide further detail in respect of charging provision for electric vehicles. We welcome the amendments, outlining a need for developers to work with energy companies, distribution network operators and the planning authority to ensure the delivery of appropriate energy infrastructure for current and future electric vehicle capacity. National Highways has set an ambition for all of our customers to be travelling using net zero transport by 2050, in line with the UK Climate Change Act. We therefore welcome local policy that requires an expansion in the scope and scale of electric vehicle charging facilities as part of new development.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR03

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** Strategic Policy TR03 identified the need to prepare a Travel Plan, Transport Statement or Transport Assessment for developments likely to generate significant amounts of vehicle movements. The requirement is now extended to cover significant people movements as part of the amended Publication Draft. We note that a further clarification has been added to Strategic Policy TR03, strengthening requirements and reflecting national guidance: "Where sustainable travel measures are insufficient to mitigate unacceptable highway safety impacts or there are severe cumulative adverse impacts associated with additional traffic demand, proposals should identify and deliver (or contribute to the delivery of) any necessary highway improvements to the local and/or strategic road network. Where it is not possible to address such impacts, planning permission should be refused". The amended policy wording identifies the potential that sustainable travel measures alone may be insufficient to address the impacts of development and is welcomed by National Highways.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR02

**1(b). Does your comment relate to one of the changes listed above?:** No

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:** Strategic Policy TR02 seeks to protect sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. As per our March 2025 response, the policy protects sites and routes of interest to National Highways and is therefore supported. We continue to recommend that the policy should reflect any further transport sites and routes identified as part of ongoing work on the Greater Exeter Transport Study or IDP. Subject to any future revisions of each document, the policy may therefore require further amendment.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:** 17. Implementation and Monitoring

**1. To which part of the Implementation and Monitoring chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 17.2, 17.3

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Implementation and Monitoring chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Implementation and Monitoring chapter, please use this box to set out your comments.:** The publication draft plan continues to advise that each policy should outline intended outcomes and how success will be monitored. We welcome the additional reference to monitoring the outcomes and successes of the Greater Exeter Transport Study under paragraph 17.2. We also note that the Marlcombe Transport Vision proposes a governance body to oversee its implementation, with a monitoring framework to track progress. We understand that the ongoing monitoring will inform future reviews of the Local Plan and associated infrastructure planning. 39. The additional monitoring requirements under paragraph 17.2 are supported. It is an objective of the Local Plan to promote sustainable transport, and it is important that the effectiveness of travel measures and overarching strategies are kept under review to identify any requirement for further action. 40. The additional paragraph 17.3 clarifies that the Council will review policies to assess the need for updates at least every five years, in accordance with National Planning Policy and relevant regulations. It is vital that monitoring of the Greater Exeter Transport Study and Marlcombe Transport Vision should inform this review process. Whilst the Marlcombe Transport Vision currently presents a framework for future monitoring, this will require further development to ensure a robust and comprehensive strategy that is able to appropriately inform future development and infrastructure decisions.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

3.1

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Summary 50. National Highways welcome the opportunity to comment on the Second Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042. Our comments follow a previous response (dated March 2025) to the First Regulation 19 consultation, and we would recommend that this letter should be read in conjunction with those previous comments. 51. The East Devon Local Plan includes significant growth in the West End area located close to the M5 motorway and A30 Trunk Road. Given the scale of planned growth in the West End, National Highways has concern over the potential residual cumulative impacts of new development. The addition of development growth from neighbouring authorities, alongside background traffic demand, strengthens the need for an ambitious strategy to accommodate future travel demands across the Exeter travel to work area. 52. Amendments to the Publication Draft and supporting IDP (Version 02) seek to provide additional detail in terms of future infrastructure and monitoring requirements for the Local Plan and the Marlcombe site in particular. The inclusion of SRN improvements within the IDP is a welcome step forward given the potential impacts of planned development. 53. However, we continue to have concern over the level of detail currently available for identified infrastructure, and the funding and delivery strategy for necessary SRN improvements. Due to limitations in the available information, not least the scope and scale of SRN infrastructure, we consider that the Plan should be considered unsound as it cannot be concluded that the growth strategy is deliverable. 54. Notwithstanding the above, we are committed to continue working collaboratively with the Council and Devon County Council ahead of Examination, with a view to informing SRN requirements and overcoming our current concerns. We trust that our response is clear regarding the areas of concern and assists with any further amendments to the East Devon Local 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.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** 22. The updated IDP (Version 02) now sets out key infrastructure requirements for Marlcombe, including the following to be delivered by Devon County Council and developers:

- North-south link road connecting the A3052 with the A30 Airport junction (TRA-18).
- Provision of high frequency bus routes linking to key destinations and enabling interchange with rail services (TRA-19).
- Improvements to the A3052 corridor, including upgrades to the Clyst St Mary roundabout, bus priority measures and a protected cycle path (TRA-20).
- New Park and Ride sites on the northern and southern edges of Marlcombe adjacent to the A30 and A3052 to intercept vehicular trips into Exeter (TRA-21).
- Off-site active travel enhancements including a new crossing of the M5 and improvements to Bishops Court Lane (TRA-23 and 24).

• On-site active travel infrastructure, mobility hubs and travel planning measures (TRA22, 25 and 26). 23. We note that National Highways is listed as a delivery organisation (alongside Devon County Council and the developer) for capacity enhancements and active travel improvements at the A30 Airport junction (TRA-16). Whilst National Highways welcome the inclusion of improvements to the Airport Junction and will wish to critically review proposals for the junction, it is unlikely to be responsible for the delivery of improvements necessary to support the Marlcombe development. 24. We also note that the updated IDP now includes a requirement for works to increase capacity at M5 J29 and J30 (TRA-17). National Highways is listed as the delivery organisation for these works. The IDP advises that, "Works at and between J29 and/or J30 of the M5 are likely to be required to limit the impact of planned

development across the Exeter Travel to Work Area upon junction capacity. Further work is ongoing to establish the measures required and so costs are currently unknown". The acknowledgement is welcomed by National Highways, although responsibility for the delivery and specification of improvements will need to be shared between public bodies.

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**Organisation (where relevant):** National Highways

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

3.44

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Additional supporting text at paragraph 3.43b recognises that a considerable amount of transport infrastructure will be required alongside housing and employment growth. We accept that wider (background) growth in traffic will contribute to infrastructure requirements, but we consider that the significant scale of planned development in the West End will equally bring forward the need for improvements. The additional paragraph concludes that development in East Devon and neighbouring authority areas will contribute to the delivery of transport infrastructure as appropriate, but it is likely that additional public funding will be necessary. 18. We welcome the additional commitment at paragraph 3.44b for the Council to work with infrastructure and service providers to ensure timely and effective infrastructure delivery. However, we highlight that additional work is needed to define the scope of required improvements and to demonstrate deliverability, and we draw attention to the following advice at paragraph 29 of the DfT Circular: “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.”

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Strategic Policy SP07 relates to the timely delivery of infrastructure to support the needs of development. A proposed wording change clarifies that future planning applications for new development proposals will be required to assess the infrastructure requirements arising from their development, “where not already identified in a development allocation policy or the Infrastructure Delivery Plan (noting these needs should be addressed in any planning application)”. The additional text reinforces the need to adequately and accurately identify the infrastructure requirements of planned development as part of the Local Plan process.

With paragraph 3.47 advising that “As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required”, we repeat our previous assertion that the strategic transport needs of the whole plan must be understood and agreed at an early stage. We also continue to advise that the IDP may require further update to accommodate allocated growth, both that to be delivered within the plan period and beyond.

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**Organisation (where relevant):** National Highways

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP04

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Strategic Policy SP04 sets out proposed employment provision and a distribution strategy. Compared to the First Regulation 19 consultation, we note that small reductions in employment provision are proposed at Marlcombe and across other allocations. Despite the reductions, the scale and type of employment targeted for the West End will generate additional commuter travel demands and longer distance freight journeys via the SRN. Employment land and potential job creation at Marlcombe will remain a small percentage of the sub-regional economy, and the internalisation of live/work journeys may be limited given sub-regional employment opportunities and the gravitational pull of Exeter.

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**Organisation (where relevant):** National Highways

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**1(b). Does your comment relate to one of the changes listed in the table above?:** No

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** The plan vision outlines that the western side of East Devon will continue to be a focal point for growth, with Marlcombe and wider growth located on the urban fringe of Exeter and the M5 corridor. Approximately half of all new homes are planned at the West End, and the Spatial Strategy (Strategic Policy 01) focusses new employment development in and around the Enterprise Zone, Exeter Airport and the M5. We previously highlighted that whilst the West End location offers the potential to capitalise on existing transport links and connections into Exeter, potential impacts for the SRN need to be fully considered.

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**Proposal:**

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Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

3.1

**1(b). Does your comment relate to one of the changes listed in the table above?:** Yes

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Policy Context

5. National Highways input to the Local Plan process is guided by the National Planning Policy Framework (NPPF) and DfT Circular 01/2022. Our March 2025 correspondence set out relevant policy extracts guiding our comments. 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”.

6. We note that an Infrastructure Delivery Plan (IDP) (Version 02 dated November 2025) has been submitted in support of the Second Regulation 19 Publication Draft which now includes proposed transport infrastructure to serve the Marlcombe New Community alongside wider allocations. The IDP includes projects to improve SRN junctions at M5 J29, J30 and the A30 Exeter Airport junction, alongside wider public transport and active travel improvements. Whilst the recognition of SRN impacts is a significant enhancement to the Publication Draft, we do not believe that adequate information is currently available to demonstrate the deliverability and effectiveness of the identified improvements. The transport evidence provides no designs for SRN improvements or wider transport measures supporting the Marlcombe New Community, and it is unclear on what basis indicative costs have been estimated. Further work will be required to define the scope and scale of necessary improvements, and to demonstrate their deliverability and effectiveness.

7. National Highways is pleased to continue working collaboratively with East Devon District Council and Devon County Council regarding specific aspects of transport evidence for the East Devon Local Plan. As part of this collaboration, we continue to undertake operational assessment work to consider the potential impacts of growth for selected SRN junctions. We are also contributing early advice in terms of future design considerations for motorway slip roads. In parallel we recognise that Devon County Council are finalising a summary document for the Greater Exeter Transport Study that will outline a range of measures responding to cumulative travel demands across the wider area. Both workstreams should continue to inform future revisions to the IDP ahead of Examination, but we would caution that further work is likely to be required to explore the scope of identified works to increase capacity at M5 J29 and J30 and to demonstrate the extent to which planned growth is reliant on their delivery. Previous Responses and Ongoing Consultations

8. National Highways has provided comments on previous draft versions of the East Devon Local Plan, with our most recent comments set out in our March 2025 response. 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.

9. Key comments from our March 2025 correspondence included the following:

- We welcomed plan objectives to promote sustainable transport and ensure infrastructure delivery keeps pace with development growth. However, we raised concern over the adequacy of the transport evidence base and the potential for material impacts on the SRN resulting from development in the West End and the Second New Community (now known as Marlcombe) in particular. We advised that the we considered the Publication Draft plan unsound, on the basis that the development strategy is not informed by proportionate evidence in respect of potential transport impacts and infrastructure requirements including operational modelling of the performance of key junctions. x Registered office Bridge House, \*\*\* Personal details have been removed \*\*\* Walnut Tree Close, Guildford GU1 4LZ National Highways Limited registered in England and Wales number \*\*\* Personal details have been removed \*\*\*
- We highlighted ongoing collaboration with East Devon District Council and Devon County Council on the development of transport evidence for the Local Plan and Second New Community (Marlcombe) and advised that amendments to the Greater Exeter Transport Study may be required to reflect any future agreement of measures identified as part of the final Transport Study and Second New Community assessment work.
- We recommended that policies within the East Devon Local Plan should include additional references to the Greater Exeter Transport Study, uncertainty over required

infrastructure improvements and funding, and the need to comprehensively monitor future travel outcomes, thereby adopting a 'monitor and manage' approach. 10. Evidence of cumulative traffic demands associated with Local Plan development in East Devon and neighbouring authorities has previously been reported by Devon County Council. National Highways has subsequently accounted for cumulative traffic growth forecasts in our microsimulation modelling of the M5 and A30 – reporting of this work is included as supporting evidence (TRI-033) for the Second Regulation 19 consultation. The work identified the potential for significant congestion at M5 J29 and J30, the A30 Airport roundabouts, and the A3052 Clyst St Mary roundabout. Further model scenarios are being assessed by National Highways and will be reported to East Devon District Council and Devon County Council in due course. As referred to in the Marlcombe Transport Vision document (paragraphs 2.12.1 and 7.7.1), the additional model scenarios seeks to consider the role of background traffic growth alongside planned development. 11. It is welcome that the Version 02 IDP recognises identified SRN capacity constraints but we continue to have concerns over the limited detail regarding necessary infrastructure improvements, alongside their funding and delivery. Whilst we are committed to continue working with the authorities to support the identification of infrastructure required to deliver planned growth, National Highways consider the current evidence to be unsound given the lack of detail regarding the deliverability and effectiveness of the proposed mitigations.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**  
Marlcombe

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Marlcombe Transport Vision 41. An updated Transport Vision document is submitted as supporting evidence for the Second Regulation 19 Publication Draft. National Highways provided comments on an earlier version of the document in October 2025. The Transport Vision seeks to achieve high levels of internalisation, with further reductions in car use targeted through travel interventions. 42. The vision emphasises the need for early implementation of transport infrastructure and on-site facilities. The following measures are identified for delivery during the pre-commencement or initial occupation stages (Phase 1):

- Early completion (Phase 1) of the primary access road between the A30 and A3052 to facilitate construction and support bus routing.
- Early improvements to the A30 Airport junction.
- Early provision of Park & Ride sites adjacent to the A30 and A3052.
- Provision of an Education Campus prior to the first occupation of residential dwellings. 43. The following measures are identified for delivery during Phase 2, understood to represent occupation of the first 500 dwellings:

- Provision of a community centre, convenience store, 10,000sqm employment floorspace, sport and play facilities.
- A3052 Clyst St Mary junction improvements.
- Bus priority measures on the A3052 to M5 J30 and the Sowton Industrial Estate.
- New public transport links to Cranbrook and employment at Skypark and the Exeter Logistics Park, Sowton and the City Centre. 44. The following measures are identified for delivery during Phase 3, understood to represent occupation of the first 1,000 dwellings:
  - Provision of additional 10,000sqm employment, health provision and town centre uses.
  - Passing loop on the West of England rail line, allowing existing rail frequency to be doubled between Exeter and Axminster (relevant to Cranbrook station).
  - New active travel crossing of the M5 between Marlcombe and Sowton.
  - New protected cycle path along the A30 Honiton Road and Sowton Lane. 45. A further rail-based improvement is proposed during Phase 4 (up to 3,500 dwellings) and seeks to provide a new passing loop on the Avocet Line, allowing increased rail frequency between Exeter and Digby & Sowton. It is understood that the passing loop improvement will be delivered as part of Devon County Council's ongoing Devon Metro project. However, it is not clear if there is a subsequent commitment from the operator to run additional services. 46. Whilst the ambition to deliver transport infrastructure and on-site facilities early in the development build-out is welcomed, we have concern whether it is realistic to expect this scale of infrastructure provision (and associated financial outlay) so early in the development build-out. Experience from the Cranbrook new community also suggests that commercial interests can lead to delays in the delivery of non-residential uses, and additional support from the Local Authority may be required to pump-prime land uses that support internalisation – this is recognised in section 6.8 of the Transport Vision. 47. It is noted that no further details are presently available in terms of improvements impacting the SRN, notably improvements to the A30 Airport junction, bus priority measures on the A3052 to M5 J30, and a new active travel crossing of the M5. Paragraph 3.1.6 of the transport vision notes that, "Work is ongoing to develop an agreed infrastructure strategy to detail required improvements or credible options to demonstrate deliverability". This work is vital to determine whether the identified improvements are realistic and achievable. 48. Paragraph 2.12.1 of the vision document also states that, "it is likely that improvement measures will be required at or around Junctions 29 and 30 of the M5. Further analysis is required to differentiate between impacts of background growth, collective Local Plans and Marlcombe specifically on the strategic highway network managed by National Highways (in this area, the M5 and A30). The design and timing of these improvements

is currently under consideration by National Highways”. National Highways has committed to explore design and modelling considerations impacting each motorway junction. This includes the option of delivering early lining and signing changes at M5 J30. 49. However, it is our view that progressive delivery of the Marlcombe site is likely to have a material impact on the future operation of M5 J30, and further work is required from East Devon District Council and Devon County Council to explore improvement options. Paragraph 1.1.11 of the Trip Rate Appendix to the Transport Vision highlights that the scope for traffic capacity enhancements at some junctions may be restricted and that a more holistic approach will need to be adopted. Whilst we agree that a holistic approach is necessary given proposals for bus priority and active travel improvements, the potential for highway capacity enhancements should not be discounted, and further work is recommended to explore opportunities.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS12

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**  
Clge\_07

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:** In respect of wider development within the West End, including proposed employment land at Sandygate (WS12), Lodge Trading Estate (WS13), Langdon's Business Park (WS14) and Darts Farm (WS15), policy wording states that development may be required to contribute towards localised mitigation on the highway network. We previously advised that it may be appropriate to include reference to contributing to wider strategic transport improvements. Noting the inclusion of M5 improvements in the updated IDP, we would continue to recommend that a contributions strategy should be developed to support the future delivery of improvements.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS13

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**

Brcl\_27a

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

In respect of wider development within the West End, including proposed employment land at Sandygate (WS12), Lodge Trading Estate (WS13), Langdon's Business Park (WS14) and Darts Farm (WS15), policy wording states that development may be required to contribute towards localised mitigation on the highway network. We previously advised that it may be appropriate to include reference to contributing to wider strategic transport improvements. Noting the inclusion of M5 improvements in the updated IDP, we would continue to recommend that a contributions strategy should be developed to support the future delivery of improvements.

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**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS14

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**

Sowt\_15a

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

In respect of wider development within the West End, including proposed employment land at Sandygate (WS12), Lodge Trading Estate (WS13), Langdon's Business Park (WS14) and Darts Farm (WS15), policy wording states that development may be required to contribute towards localised mitigation on the highway network. We previously advised that it may be appropriate to include reference to contributing to wider strategic transport improvements. Noting the inclusion of M5 improvements in the updated IDP, we would continue to recommend that a contributions strategy should be developed to support the future delivery of improvements.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS15

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**  
Clge\_23 and Clge\_25a

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:** In respect of wider development within the West End, including proposed employment land at Sandygate (WS12), Lodge Trading Estate (WS13), Langdon's Business Park (WS14) and Darts Farm (WS15), policy wording states that development may be required to contribute towards localised mitigation on the highway network. We previously advised that it may be appropriate to include reference to contributing to wider strategic transport improvements. Noting the inclusion of M5 improvements in the updated IDP, we would continue to recommend that a contributions strategy should be developed to support the future delivery of improvements.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS10

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:** Land North of Topsham

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:** 29.

Under Strategic Policy WS10, development next to the M5 and north of Topsham would be supported by a Development and Infrastructure Delivery Framework to be produced jointly by East Devon District Council and Exeter City Council. We note and welcome the amendment to Policy WS10 to include National Highways as a partner in the production of the Delivery Framework, thereby ensuring that SRN interests are reflected and appropriately accounted for. 30. Strategic Policy WS10 advised that “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 the new community, 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”. National Highways has previously recommended that this work should be completed prior to adoption of the plan so that the cumulative infrastructure needs of the Topsham area are appropriately understood and planned for. 31. Whilst M5 J30 and the Clyst St Mary roundabout are both accounted for in the updated IDP (Version 02), we would advise that the Councils should continue to review infrastructure requirements with National Highways, accounting for proposals for bus priority improvements and the need for a strategic public transport offer to support the Marlcombe development. Noting the proposal for a

new active travel crossing of the M5 east of Newcourt rail station referenced at paragraph 4.45b, the siting, design and associated costs of this scheme could have a significant bearing on its deliverability.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**  
Marlcombe

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Strategic Policy WS01 seeks to allocate land for the development of the Marlcombe New Community to accommodate at least 8,000 new homes, with around 3,300 new homes, 16.5 ha of employment land (use classes E, B2 and B8) and 5 ha of town centre uses delivered by 2042. The policy is clear that the new community will ultimately need to accommodate at least 10,000 new homes. Amendments to the plan clarify that new education facilities will be provided at Marlcombe, with early delivery of an education campus for all age groups, and subsequent provision of three additional primary schools. 21. In addition to the amended policy wording for WS01 it is helpful that the Plan outlines a Masterplan and associated Marlcombe Transport Vision. The Vision document sets out key expectations and phased transport improvements linked to specific stages of development build-out. National Highways believes that the phasing of proposed infrastructure should be robustly incorporated into a policy position, Masterplan or IDP to clearly set out 'Trigger Point' expectations. To evidence this position, the deliverability and viability of necessary infrastructure improvements need to be clearly demonstrated.

Whilst we recognise that future junction capacity issues are not solely attributable to development growth in the West End, planned allocations across Greater Exeter (and

particularly at Marlcombe) are expected to have a material impact on highway performance. The DfT Circular 01/2022 is 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”. Multi-modal enhancements to relevant SRN junctions are therefore likely to be an important component of the delivery strategy for the Marlcombe allocation. 26. National Highways is currently undertaking further traffic modelling to explore this issue (as indicated in the Vision document para 3.1.7). Existing traffic modelling suggests an identified need for both interim and longer-term improvements at M5 J30. Furthermore, with the vision for Marlcombe seeking to maximise use of sustainable travel modes, it is likely that both locations will require enhancements for active travel and bus priority to ensure credible and attractive alternatives to private car use. 27. We understand that an Infrastructure Delivery Strategy (IDS) will be prepared for the Marlcombe allocation (to align with the IDP). Development proposals will need to accord with the IDS. It is also stated that development proposals will be expected to contribute to the costs of new infrastructure and in appropriate cases the forward-funding of new infrastructure by the Council, developers or third parties may take place. 28. We continue to have concern that the detail of strategic transport infrastructure required to support delivery of planned growth in the West End is uncertain. Whilst further work has been undertaken in respect of the vision for Marlcombe, the scope and scale of infrastructure requirements and the ability to avoid significant adverse impacts to the SRN are currently uncertain.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

4.8d

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

Paragraph 4.8d of the amended Publication Draft now includes reference to the renamed Greater Exeter Transport Study. Whilst the Study is not referenced in Policy terms, it is welcome that the additional paragraph commits the Council to working with key partners on its delivery.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):**

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**

Axmi\_01a, Axmi\_02, Axmi\_08, Axmi\_09

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

Amendments to Chapter 5 ('Development in the Towns and Villages') of the Publication Draft document ('tracked changes') are mostly outside of the interest of National Highways. As such we have few additional observations and would refer the Council to our original comments on this section in our March 2025 response. 34. Nevertheless, it was previously identified that Strategic Policy SD02 seeks to allocate sites in Axminster with selected allocations appearing to bound the A35 corridor either side of the Abbey Gate junction. It was previously identified that the concentration of development alongside the Abbey Gate junction and the single carriageway nature of the A35 at this location could give rise to road safety issues due to additional turning movements. We now note that the proposed allocation at Land west of Musbury Road (Axmi\_01a) has been removed from the Publication Draft. We also welcome the additional reference to SRN interests under the Land east of Musbury Road (Axmi\_02, Axmi\_08 and Axmi\_09) proposed allocations.