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**Sent by email:** [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk)

Dear Matt

## **East Devon Local Plan 2020-2040 – Preferred Options Reg 18 Consultation Draft Plan (Autumn 2022)**

Thank you for providing National Highways the opportunity to comment on a preferred options draft version of the East Devon Local Plan.

National Highways are responsible for operating, maintaining and improving the Strategic Road Network (SRN). The SRN within the East Devon Local Plan area comprises the M5 including Junctions 29 and 30 and sections of the A30, A35 and A303 trunk roads.

The SRN is a critical national infrastructure asset and its role is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. Our motorways and major A-roads are the most heavily used part of the national road network; they carry a third of all traffic and two-thirds of all freight. It is based on our responsibility to manage the SRN that the following comments have been made.

### **Current Status of the SRN within East Devon**

The SRN within East Devon includes the M5, the A303 and the A35 which both link into the A30. All these routes perform a key function in providing strategic connectivity across the country. The M5 around Exeter is the only strategic road route connecting the south-west peninsula to the rest of the UK. This route therefore has a priority both in terms of strategic through-traffic that is vital for the peninsula as a whole, but also in terms of supporting economic performance and growth. The A30/A303 links to the M3, connecting into the south-east and London, this route also performs a resilience function in providing an alternative to the M5/M4 east-west cross-country route. The A30/A35 provides an important role as a south coast route and access.

Current status of the SRN within East Devon can be considered in three sections<sup>1</sup>:

- Exeter Gateway – including the M5 and specifically Junctions 29 and 30  
Bordering the city of Exeter the M5 can experience reduction in speeds due to traffic volume. This can be exacerbated with seasonal influence, where traffic can be around 20% higher in August

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<sup>1</sup> Elements of this advice is taken from National Highways' Route Strategies (2017) – published here: <https://www.gov.uk/guidance/future-investment-in-englands-motorways-and-major-roads#route-strategies>

compared to March. Resilience is also a key consideration in this location, with the M5 reliant on the Exe and Exminster Viaducts with limited alternative routes.

M5 Junctions 29 and 30 are key access points for East Devon. The M5 separates East Devon and Exeter, where traffic funnels through these junctions to access the city. Both junctions have had capacity improvements in recent years, however, they remain constrained during peak periods. Peak hour queuing can be experienced, particularly at Junction 30, with the constrained local highway network and the need to accommodate significant volumes of traffic exiting the motorway creating sensitivities. The short merge and diverge on the M5 itself between the two junctions can also add to congestion. Congestion on the SRN compromises its function in the efficient long-distance movement of people and goods and creates a safety risk. It is anticipated to be a challenge for growth within and around Exeter to be accommodated by the SRN in this location without either improvement to infrastructure/route options and/or significant modal shift.

- A30 to the A303  
The performance of this route can vary due to high volumes of seasonal traffic which leads to slower speeds and congestion. The transition from sections of dual to single carriageway can cause delays to users of the A30/A303.
- A35  
Congestion and delay on the A35 can be experienced during summer holiday periods. As identified in the 2017 Route Strategies severance issues through villages along the A35 could be exacerbated by increased growth and resultant traffic.

Alongside the East Devon Local Plan, local plans are emerging in the neighbouring districts of Exeter, Teignbridge and Mid Devon. The growth proposed in these plans will cumulatively likely exceed the current SRN capacity, which is particularly constrained at Exeter with traffic either passing through SRN connections to reach the city or joining/exiting the M5. Alongside pressure created by emerging proposals for development within and around Exeter, the city's function as a regional centre for employment and recreation attracts vehicle trips. To ensure cumulative impacts are addressed we request joint working on transport evidence for the emerging local plans, to support the delivery of sustainable growth. It is positive that early conversations regarding transport evidence indicate joint evidence is intended to be prepared for the East Devon Local Plan.

## **National Highways and the Plan-Making Process**

National Highways expects transport and land use planning policy to be closely integrated. In this respect, we draw your attention to DfT Circular 01/2022. This document sets out how we engage with the planning system and how, in the context of the SRN, sustainable development should be achieved through planning. Key guidance/policy elements for Local Planning Authorities in developing local plans and associated evidence relevant to the SRN are identified in Appendix A.

National Highways recognises that prosperity depends on our roads, so aims to support growth and facilitate development based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. To constructively engage in the Local Plan making process we require a robust evidence base so that sound advice can be given to Local Planning Authorities on the appropriateness of proposed development in relation to the SRN. This also extends to include the identification of transport solutions that may be required to mitigate adverse impact on the SRN and support the delivery of sustainable growth across the plan area.

## Emerging East Devon Local Plan and SRN Considerations

### Vision and Objectives (Chapter 2)

Broadly National Highways supports the vision and objectives identified for the East Devon Local Plan. The vision covers three themes: homes and communities, a greener East Devon and a resilient economy. The vision is expanded into 11 objectives, with specific reference to tackling the climate emergency, promoting sustainable transport and securing infrastructure in a timely manner, all endorsed by National Highways.

### The Spatial Strategy (Chapter 3)

#### *Strategic Policy 1 - Spatial strategy*

This policy firstly identifies new development will be directed towards the western side of the district, including a new town and other major strategic developments close to Exeter. There is then a hierarchy of settlements identified to sustain proportionate levels of growth. Wherever possible, National Highways support plans that minimise the need for travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all. This can contribute to the achievement of net zero environmental objectives and reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion. As identified above, we have concerns to what extent, in its current form, the SRN can support the levels of growth proposed to the west of the district. Comments regarding the locations and sites identified in the spatial strategy are further considered in the Chapter 5 and 6 sections of this response.

In paragraph 3.7 the relationship of this emerging Local Plan and the adopted Cranbrook Plan are considered. Views are sought regarding whether some policies from the existing Local Plan should be saved in respect of determining planning applications at Cranbrook, or whether policies from this plan should apply if the Cranbrook Plan does not cover a particular issue. We consider the latter has the potential to bring better outcomes, bringing the policy basis of Cranbrook up to date and consistent with other parts of the district.

#### *Strategic Policy 2 - Housing distribution*

In Strategic Policy 2 the East Devon Local Plan proposes 18,167 homes between 2020-2040, with 1,953 homes already completed between 2020-2022 and 4,403 homes already committed. The total does not include windfalls (2,335 homes). Approximately half the new homes proposed are Exeter facing, in the western side of East Devon, with the other half across the rest of East Devon. Comments regarding the proposed distribution, and implication for the SRN, are contained in the more detailed discussion of the proposed development locations below (relating to Chapters 5 & 6).

It is noted that Cranbrook has 4,170 homes identified in Strategic Policy 2 to align with the adopted Cranbrook Plan. Current development management discussions are identifying an emerging potential overprovision of housing compared to the Cranbrook Plan allocation. With growth beyond 4,170 homes not captured within planning policy this development will either undermine elements of the new town allocation that are yet to come forward, or generate windfalls. It would be beneficial to have a strategic policy approach in place for the likely full extent of Cranbrook new community, for which we are keen to be able to interpret a collective potential impact on the SRN and consider/secure infrastructure requirements.

*Strategic Policy 4 - Employment provision and distribution strategy*

National Highways primary role is to deliver a better service for road users and to support a growing economy. We note that the draft Local Plan includes ambitions to support and encourage economic growth, this is supported, caveated that proposals do not compromise the function of the SRN.

The quantum of employment development in the East Devon Local Plan is yet to be determined, awaiting the outcome of the ongoing Economic Development Needs Assessment. Employment sites are intended to follow the current pattern of delivery, on the western side of the district (including the Exeter and East Devon Enterprise Zone) and serving local needs according to the hierarchy of settlements. It is identified that the western side of the district is particularly advantageous for businesses for a number of reasons, including proximity to the M5. While access to the M5 may be attractive, if travel impacts from proposed growth cannot be mitigated, the reliability of the network could become a potential constraint. As the employment proposals of the plan become quantified it will be for the Local Plan supporting transport assessment evidence to further consider the impact of the economic aspirations of the plan and how this can be accommodated, which will enable us to interpret potential impact on the SRN.

*Strategic Policy 5 - Mixed use developments incorporating housing, employment and community facilities*

Strategic Policy 5 seeks to secure employment land alongside residential development, with thresholds and ratios proposed. Encouraging mixed use development is endorsed by National Highways to enable sustainable development. It is assumed that the implication of this policy will be included in the Local Plan supporting transport assessment evidence when interpreting the potential impact of allocations on the local road network and the SRN.

*Strategic Policy 6 & 7 - Development inside/outside of settlement boundaries*

As identified in our comments regarding the spatial strategy of the plan, wherever possible we support plans that minimise the need for travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all. This accords with the policies to support in principle development within settlement boundaries, and to not generally support development outside settlement boundaries.

Future Growth and Development on the Western Side of East Devon (Chapter 5)

*Strategic Policy 8 – Development of a second new town east of Exeter*

Strategic Policy 8 proposes a new town on the western side of East Devon, with the preferred site being Option 1, located to the north of the A3052 and south of the A30. Two alternative options are identified, each shifting southward.

The new town proposals include:

	Homes	G&T Provision	Employment (E, B2, B8)	Town Centre	Other
Up to 2040	2,500	15 pitches	17.5ha	5ha operational	- 23ha educational facilities
Beyond 2040	5,500	15 pitches	38.5ha	10ha operational	- Social, leisure, health, community facilities
TOTAL	8,000	≥30 pitches	56ha	≥15ha	- 254ha green infrastructure

The proposed new town growth is significant. It appears from the supporting evidence that the access arrangements are:

- Option 1 - Two access points to the development site are planned as part of this scenario; one in the north providing access to the A30, and one in the south providing access to the A3052. A 2-lane, 20mph through-road connecting the northern and southern access points has been assumed to limit the amount of through routing.
- Option 2 - Two access points to the development site have been considered as part of this development scenario, both providing access to the A3052.
- Option 3 - Three access points to the development site have been considered as part of this development scenario: one connecting to the A3052, one connecting to the B3179, and one connecting to the A376.

Mapping implies that Option 1 is proposing to use the SRN B3184/Exeter Airport junction of the A30 as a main access, we presume using the existing Bishops Court Lane roundabout arm. The connection to the A30 may have implications for the A30 itself and M5 Junction 29. The A3052 connection to the south of the new town links westward to M5 Junction 30. Robust evidence is required to interpret the impacts of the proposed new town on the safe and efficient operation of the SRN. As required by the DfT Circular 01/2022, we anticipate evidence to demonstrate all options have been explored to reduce the reliance on the SRN for local journeys, which we anticipate will be generated with the proposed new town main access onto the A30.

Options 2 and 3 access arrangements link westwards into M5 Junction 30. If these options are to progress, further work would be required to interpret impact on the SRN.

It is noted that 'Highways Impact' is considered in the published evidence document 'East Devon - Options Appraisal for a potential New Settlement' (October 2022), with a 'Highways Impact Modelling Report' provided in Appendix D. We suggest that it would have been constructive to have discussed this work with National Highways while in development. Having reviewed this evidence:

- We note the limitations listed in para 8.9 of the options appraisal report, to justify consideration of 2,500 homes in the transport modelling report, rather than the full 8,000 dwelling new town. There is no suggestion that the new town would be sustainable or acceptable at 2,500 dwellings alone, with it stated in the draft Local Plan that 8,000 homes is necessary for a wide range of services to be provided, including a secondary school. As such, the current evidence is insufficient to support the new town policy allocation. It is proposed that the next stage of work will be modelling the full extent of the new community using a vision and validate approach. National Highways anticipate this work to be a component of/dovetail with the wider joint transport evidence base being developed for East Devon and neighbouring authorities' local plans, in which National Highways are keen to be involved. To enable us to accept the new town proposal we will need to fully understand the local and strategic highway networks' ability to deliver the planned extent of 8,000 dwellings. Vision and validate work should be clear in identifying the geographically specific accessibility characteristics of the new town, test plausible and evidence-based scenarios and consider how outcomes will be monitored and managed. Required mitigation/infrastructure will need to be identified as necessary and included in Local Plan policy. It is critical this process is thorough, with parameters appropriately scoped and agreed with National Highways to enable us to endorse outcomes.
- No additional local plan, or background growth beyond the existing adopted local plans for the districts of Exeter, East Devon, Teignbridge and Mid Devon was included in the modelling work. As acknowledged in the report, the analysis of impacts on junctions is therefore likely to change. This is agreed, and therefore the evidence document provides no basis for National Highways to interpret



the impact of the tested 2,500 dwellings on the safe and efficient operation of the SRN. We anticipate this matter will be resolved in future evidence development.

- The modelling undertaken utilises the DCC Greater Exeter Model, and there is mention in the options appraisal report that the model has been developed in liaison with National Highways. National Highways were involved in discussions with DCC regarding the model several years ago but have not approved this model. As part of developing a joint transport evidence for the local plans at and around Exeter, including for East Devon, we are in the process of reviewing this model and working with DCC on updates, to ensure outputs can be endorsed by National Highways in the future.
- The modelling used a forecast year of 2030, which does not correlate with the plan period end date of 2040. An end of local plan year assessment will be required. Future modelling work will need to be more nuanced in considering the phases of the new town, with assessment of each to identify impacts and potentially necessary transport mitigation.

For the reasons set out above, we are unable to concur the highway conclusions in the aforementioned highways impact modelling report or options appraisal report. The options appraisal report states in para 8.22 that '*there is likely to be potential to achieve minor improvements to J30 such as more efficient operation of traffic signals or minor changes to line markings to accommodate heavier traffic movements*', so are considered '*minor and deliverable*'. Work to maximise the performance of M5 Junction 30 has been undertaken relatively recently, as such we would need to see evidence that further improvements can be identified and the deliverability and potential gain of proposals. Various improvement options are considered for Clyst St Mary Roundabout (including a potential park and ride), any mitigation infrastructure identified for delivery of the new town would need to be factored into modelling work to interpret impact on M5 Junction 30 and the wider SRN.

Based on the information provided, all new town options are likely to be heavily reliant on the A30 and A3052, and therefore could result in an impact on the operation of M5 Junctions 29 and 30. Without intervention this is likely to result in congestion and increased risk to road safety. If the proposal of the new town is to be delivered beyond the local plan horizon to 2040 National Highways will need to see evidence to demonstrate what will be required to accommodate the proposal up to 2040 and what would be required beyond this period. Consideration of the full new town proposal is necessary to ensure it can be accommodated without resulting in an unacceptable impact on the safe operation of the SRN.

*Strategic Policies 9-15 – strategic scale employment provision and job growth on the western side of East Devon*

Strategic policy 9 positively supports development of employment generating uses with the designated Enterprise Zone, with a series of specific employment site policies:

- Strategic Policy 10 – Exeter Science Park
- Strategic Policy 11 – Land north of Science Park
- Strategic Policy 12 – North of Sowton Village
- Strategic Policy 13 – Exeter Airport
- Strategic Policy 14 – Land to east of airport buildings
- Strategic Policy 15 – Land east of airport and north of the A30

This collection of sites are located in the west end of East Devon – facing the A30 and the M5 at Junction 29. The Local Plan will need to be underpinned by robust transport evidence to demonstrate the plan as a whole is deliverable and enable any necessary mitigation to be identified, including the point at which it needs to be delivered.

Alongside this evidence, National Highways need to understand any access proposals that have the potential to affect our network. The draft Local Plan materials are not clearly depicted/explicit in what is intended in terms of access for the sites for us to comment at this stage. In particular we query 'North of Sowton Village' which appears to have limited local highway access and is adjacent to the SRN.

#### *Strategic Policy 17 – Development next to the M5 and north of Topsham*

This policy proposes approximately 580 new homes and 2.4ha of employment land alongside the M5. As with the other proposals within this Chapter, evidence is required to understand the cumulative transport impact on the SRN. It appears this site will likely access the M5 and Exeter through Junction 30.

We recommend the policy text should include consideration of noise and visual intrusion impacts from the M5, to ensure this is identified as a constraint in the master planning work. We have recent examples of residential development experiencing noise issues because of having been located too close to the SRN. We encourage and endorse planning policy being proactive in considering and addressing this issue to ensure the wellbeing of future residents. The National Highways soft estate must not be relied upon to contribute any mitigation to the site as the management of our estate may from time to time affect any real or perceived benefits. Our soft estate management includes cyclical maintenance and periodic renewal, either of which could involve significant reduction in any available screening benefit until new planting is well established.

#### *Strategic Policy 18 – Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line*

It appears this site is to the north of Science Park, approximately 70m away from the M5 at its closest point. As with the north of Topsham site, we suggest potential noise impacts from the M5 should be considered and as necessary identified as a matter to consider in planning policy. We are keen to ensure noise issues are not experienced by residents in sites identified near our network.

#### Strategy for development at Principal Centres, Main Centres, Local Centres and Service Villages (Chapter 6)

#### *Strategic Policy 19 – Axminster and its future development*

This policy proposes 1,050 homes and 7.2ha of employment land (including 2<sup>nd</sup> choice sites). The A35 passes to the south of the town and has three junctions for access/egress. It is anticipated across the plan period that the SRN would be likely to be able to accommodate the level of growth proposed at Axminster, however we expect a high-level transport assessment to be carried out for the Local Plan in entirety (including cumulative impacts), which would demonstrate this as part of the Local Plan evidence base. If any issues were identified, this then would inform the policy approach and potentially Infrastructure Delivery Plan.

The preferred allocation of 'Land east of Musbury Road' (Axmin\_02 and Axmin\_08), second choice site of 'Great Jackleigh Farm' (Axmin\_09), and preferred employment site 'Land west of Musbury' (Axmin\_01) are either adjacent to the A35 or could have effect on the SRN through access arrangements. As this plan progresses, if these sites remain intended for allocation we would expect further discussion regarding arrangements for the sites to ensure impacts on the SRN are mitigated.

### *Strategic Policy 20 – Exmouth and its development future*

This policy proposes 1,033 homes and 6.6ha of employment land (including 2<sup>nd</sup> choice sites). As identified in the draft plan text, there is a substantial outflow of employed residents commuting to jobs in other locations, with Exeter being a particular draw. For residents commuting by car this impacts M5 Junction 30. We anticipate the growth proposals at Exmouth to be a component part of the transport evidence developed for the Local Plan, with growth in the town being key in cumulative impacts on the SRN in the west of the district.

### *Strategic Policy 21 – Honiton and its development future*

This policy proposes 471 homes and 14.6ha of employment land (including 2<sup>nd</sup> choice sites and excluding allocation of 3.3ha at Heathpark Industrial Estate). The dualled A30 currently forms a northern boundary to the town of Honiton (with two all movement junctions), with the A35 passing through the north of the town and heading eastward. It is anticipated across the plan period that the SRN would be likely to be able to accommodate the level of growth proposed at Honiton, however we expect a high-level transport assessment to be carried out for the Local Plan in entirety (including cumulative impacts), which would demonstrate this as part of the Local Plan evidence base. If any issues were identified, this then would inform the policy approach and potentially Infrastructure Delivery Plan.

The employment sites 'Gitti\_03' and 'Gitti\_04' are identified adjacent to the A30, as extension to the existing Heathpark Industrial Estate. It is presumed these sites will be accessed by the Local Highway Network.

A small parcel of land at Ottery Moor Lane (Honi\_10) is identified for 21 homes adjacent to the A30. We recommend the policy text should include consideration of noise and visual intrusion impacts from the A30, to ensure this is identified as a constraint in the site. We have recent examples of residential development experiencing noise issues because of having been located too close to the SRN. We encourage and endorse planning policy being proactive in considering and addressing this issue to ensure the wellbeing of future residents. The National Highways soft estate must not be relied upon to contribute any mitigation to the site as the management of our estate may from time to time affect any real or perceived benefits. Our soft estate management includes cyclical maintenance and periodic renewal, either of which could involve significant reduction in any available screening benefit until new planting is well established.

### *Strategic Policies 22-26 - Other Main Centres/Local Centres/Service Villages*

The proposals in these locations are noted. It is anticipated across the plan period that the SRN would be likely to be able to accommodate the level of growth proposed at the other locations identified in the draft Local Plan, however we expect a high-level transport assessment to be carried out for the Local Plan in entirety (including cumulative impacts), which would demonstrate this as part of the Local Plan evidence base. If any issues were identified, this then would inform the policy approach and potentially Infrastructure Delivery Plan.

Growth identified at the 'local centres' of Lympstone and Woodbury and 'service villages' of Clyst St Mary and Exton are anticipated to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30. As discussed previously, this is anticipated to be a sensitive issue in bringing forward the plan, and future discussion/work with National Highways is required on transport assessment and potential mitigation for us to be able to support future iterations of this emerging Local Plan.



## Tackling the Climate Emergency and Responding to Climate Change (Chapter 7)

It is noted that the plan includes policies and proposals to support East Devon District Council's pledge to be carbon neutral by 2040. National Highways commend this ambition. We acknowledge that taken as a whole, transport is the single biggest carbon emitter in the UK, with road transport the majority part of this. Working together we need to ensure that transport enables economic activity in an environmentally responsible and sustainable way. National Highways' approach to planning is shaped by our corporate commitments to net zero, which aims to eliminate corporate carbon emissions by 2030, maintenance and construction carbon emissions by 2040 and road user carbon emissions by 2050. Our efforts focus on cutting emissions.

For Strategic Policies 29, 30 and 31, concerning promoting renewables, solar and wind developments, we endorse the mention of 'highways' in terms of a requirement for no unacceptable impacts. The Local Plan policy maps identify locations considered suitable for renewables, including alongside the SRN. For such developments we require consideration of matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic). A number of these issues can be resolved through appropriate site layout/technology choice; however, we would support additional supporting text beside the policies to flag these considerations.

## Prioritising Sustainable Travel and Providing the Transport and Communications Facilities we Need (Chapter 11)

National Highways support the ambitions of the plan regarding sustainable transport and agree that the spatial strategy is fundamental to achieving modal shift. By delivering sites with a transport strategy that reduces or eliminates the need to travel by car, this should reduce demand on the LRN and SRN, and thus maintain a safe and efficient transport network.

The emerging Exeter Local Plan identified severance challenges cause by the M5 and A30 as a workstream for Exeter City Council and partners to prioritise. For consistency in cross border working we suggest this too could be identified in the East Devon Local Plan. National Highways notes that the location of our network separates authoritative areas and are mindful of this for new/emerging development proposals in proximity to the SRN. Therefore, we are keen to ensure Local Plan approaches and policies address issues to ensure sustainable transport movements can be supported. However, it is necessary to stress, this goal cannot compromise the safe and efficient operation of the SRN.

### *Strategic Policy 65 – Walking, cycling and public transport*

Strategic Policy 65 includes requirements to incorporate '20-minute neighbourhoods' in new developments. It is presumed this means seeking to achieve an 800-metre walkable catchment, or a 10-minute walk to your destination, and 10 minutes back home. The policy could be clearer in defining the '20-minute neighbourhood' approach to ensure meaningful achievement of this principle.

### *Policy 66 – Protecting transport sites and routes*

This policy seeks to protect a bus priority route at A3052/A376 to M5 Junction 30. It is presumed this would be intended to connect into a priority route into Exeter. With interaction with the SRN network we welcome ongoing discussion regarding this infrastructure ambition.

In addition, park and ride areas of search are identified for the A30/Heavitree Road corridor and the A376/A3052 Clyst St Mary corridor (NB typo in text with A4052). These are in proximity to M5 Junctions 29 and 30, and thus, we welcome ongoing discussion regarding this infrastructure ambition.

Further work on the transport evidence to support the plan with inform National Highways stance on the deliverability/implication of these proposals.

#### *Policy 67 – Travel Plans, Transport Statements, Transport Assessments*

National Highways generally agree with the contents of this policy. We would expect the Local Plan transport evidence base developed by East Devon District Council to inform identification of thresholds in the policy. Alongside the thresholds, we suggest the policy should contain the option for the LPA and/or highway authorities to require a transport assessment/travel plan outside these parameters if necessary. This would ensure that if an unforeseen outlier development came forward, but it was considered to bring transport implication, this can be addressed.

#### *Policy 68 – Parking standards*

National Highways generally agree with the contents of this policy. With regards to the non-residential parking standard, we require further information regarding the development of a standard figure, which should be informed by/align with the Local Plan transport evidence base. We are keen to ensure parking provision is appropriate to reasonable trip generation assumptions in the transport evidence, and overprovision is not accepted.

#### *Policy 70 – Safe vehicular access to sites*

National Highways generally agree with the contents of this policy. It should be noted that access arrangements affecting the SRN are also informed by the DfT Circular 01/2022 and must comply with the Design Manual for Roads and Bridges (DMRB).

#### Implementation and monitoring of the local plan (Chapter 17)

We note the statement of intent to carry out further infrastructure work to support the plan in Chapter 17. National Highways anticipate ongoing partnership working on this workstream, with outputs recognised in future policy contents within the East Devon Local Plan.

As identified in the DfT Circular 01/2022, it is necessary to demonstrate that Local Plan 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. There cannot be any presumption that SRN infrastructure improvements associated with growth will be funded through a future National Highways' Road Improvement Strategy.

### **Transport Evidence Base**

In accordance with the NPPF all plans and policies should be underpinned by relevant and up-to-date evidence. This should include a comprehensive transport strategy which identifies highway and transport infrastructure necessary to deliver the plan (to be reflected in the IDP) and address any severe and/or unacceptable safety impacts on the SRN.

We understand that work to develop the transport evidence base to support the East Devon Local Plan is currently ongoing. In accordance with both NPPF and DfT Circular 01/2022, East Devon Local Plan will need to be supported by a robust transport evidence base to ensure it will not result in an unacceptable impact on highway safety, and to enable it to be found sound at examination. This will include two key elements of assessment:

- The individual and cumulative impacts of the authority's policies and proposals upon the ability of the road links and junctions on the affected parts of the SRN to accommodate the forecast traffic flows in terms of capacity, safety and cumulative environmental effects; and
- The interactions between the strategic and local road networks.

We anticipate this work to include 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. This should seek to explore all options to reduce a reliance of the SRN for local journeys, including a reduction in the need to travel and maximising opportunities for active modes.


The transport evidence base required to support the plan will need to consider the impact of both committed development and the proposed allocations and policies, on M5 Junctions 29 and 30, the A30 and the A35, and identify any required infrastructure improvements over and above those already planned or delivered. Potential impacts on the nearby M5 Junction 31 and the A38 within Teignbridge should also be considered. Any necessary infrastructure improvements will need to be included within a supporting Infrastructure Delivery Plan (IDP) and clearly signposted in plan policy. National Highways look forward to continued engagement with East Devon District Council in respect of the transport evidence base necessary to support their Local Plan, together with the identification of any mitigation required to ensure the impact of the plan on the SRN can be safely accommodated.

As highlighted above, when developing evidence regarding the SRN at this location, proposals within the East Devon Local Plan should be considered cumulatively with other neighbouring emerging planning documents, including Exeter City Council, Teignbridge District Council and Mid Devon District Council. National Highways welcomes continued engagement with East Devon District Council and Devon County Council regarding their development of the transport evidence base required to support the East Devon Local Plan. Where possible, National Highways will seek to provide access to existing data and models to support this process.

We trust that our response is helpful and assists with preparation of the East Devon Local Plan. If you require further clarification or wish to discuss any of the above, please do not hesitate to contact us.

Yours sincerely



Eleanor Ward  
Spatial Planner  
Email: 

## APPENDIX A – SUMMARY OF KEY GUIDANCE/POLICY REQUIREMENTS RELEVANT TO THE SRN IN PLAN-MAKING

### ***DfT Circular 01/2022 – The Strategic Road Network and the Delivery of Sustainable Development***

The full document is available at: <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>

#### *General principles*

##### Paragraph 26:

- The Government expects LPAs to engage with National Highways from the outset of local plan/spatial development strategy development
- The involvement of National Highways will ensure that the strategic transport evidence base will provide a robust assessment of any positive and negative effects on the SRN and inform a transport strategy and the SEA for the study area that aligns with the safe operation and long-term integrity of the SRN

##### Paragraph 27:

- National Highways must co-operate as far as reasonably practicable with other parties, and is obliged to provide appropriate, timely and substantive responses in the plan-making process

##### Paragraph 28:

- Local plans (policies and allocations) must not compromise the SRN's prime function to enable the long-distance movement of people and goods
- The SRN should not be relied upon for the accessibility of new sites except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing)
- National Highways will work with local authorities to explore opportunities to promote sustainable transport modes and travel planning

##### Paragraph 29:

- New connections and capacity enhancements to the SRN necessary to deliver strategic growth should be identified as part of the plan-making process, considering cumulative impacts (including adjoining authorities), and identifying delivery mechanisms
- There cannot be any presumption that SRN infrastructure improvements associated with growth will be funded through a future National Highways' Road Improvement Strategy
- National Highways will work with local authorities to identify realistic funding mechanisms, to include other public funding programmes and developer contribution strategies, to be secured in planning policy

##### Paragraph 30:

- National Highways and LPAs should work collaboratively with the freight and logistics sector to identify and safeguard land for distribution and consolidation centres / 'last-mile' facilities

#### *Evidence base*

##### Paragraph 31:

- NPPF requires a clear and transparent evidence base to underpin a preferred approach to land use and strategic transport options, policies and allocations
- Require evidence to explore all options to reduce a reliance of the SRN for local journeys including a reduction in the need to travel and maximising opportunities for active modes

Paragraph 32:

- LPAs should consider how proposed locations of growth are genuinely sustainable and demonstrate a pathway to net zero ambitions

Paragraph 33:

- Local authorities should identify the key issues regarding transport provision and accessibility and set out how the plan can address this in consultation with National Highways
- It is the responsibility of the LPA to present a robust transport evidence base in support of its plan/strategy
- National Highways 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, including the promotion of sustainable transport modes
- A robust evidence base is 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

### *Infrastructure delivery*

Paragraph 34:

- Local plan evidence should provide a means of demonstrating that planned growth is deliverable, and that the funding, partnerships and processes are in place to deliver infrastructure; or that there is a realistic prospect that investment can be secured

## **National Planning Policy Framework**

The full document is available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- Paragraph 16: Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees
- Paragraph 31: The preparation and review of all policies should be underpinned by relevant and up-to-date evidence
- Paragraph 104: Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed
- Paragraph 105: The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes
- Paragraph 106: Planning policies should be prepared with the active involvement of local highways authorities and other transport infrastructure providers and operators, so that strategies and investments for supporting sustainable transport and development patterns are aligned
- Paragraph 111: In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe
- Paragraph 124: Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use