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Dear Local Plan Team

East Devon Local Plan (2020-2042) – Regulation 19 Publication Draft (February 2025)

1. Further to the publishing of the Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042 on 13 February 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 should be strengthened from the perspective of protecting the Strategic Road Network (SRN).
2. We understand that a further Regulation 19 consultation will be held later this year in connection with the planned development of a Second New Community for East Devon. It is currently unclear to what extent the consultation will include additional materials and transport evidence related to the New Community site. The proposal for a Second New Community represents a major component of the Publication Draft plan and has considerable potential impact on the SRN, we therefore provide comments on this as part of this first R19 consultation. Nevertheless, we shall comment further, as appropriate as part of the forthcoming R19 New Community consultation.
3. On behalf of the Secretary of State for Transport, National Highways is responsible for operating, maintaining and improving the Strategic Road Network (SRN). Our approach to plan making is specified by the Department for Transport (DfT) Circular 01/22 'Strategic road network and the delivery of sustainable development'.

The Strategic Road Network

4. Locally, the SRN comprises the M5 motorway and the A30, 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 A30 Trunk Road runs east from M5 J29 through East Devon and connects to the A35 at Honiton and the A303 east of Upton. Both routes continue eastwards to the authority boundary, with the A35 passing to the immediate south of Axminster.
5. 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. A short distance to the south-west of the East Devon authority area, Junction 31 (J31) of the M5 forms a key interchange between the motorway and Trunk Road networks, catering for journeys into Teignbridge and West Devon via the A38 and A30 respectively, and for longer distance journeys towards Cornwall.

Policy Context

6. National Highways input to the Local Plan process is guided by the National Planning Policy Framework (NPPF) and DfT Circular 01/2022.
7. Paragraph 26 of the NPPF advises that *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”*. National Highways continues to work collaboratively with East Devon District Council, neighbouring planning authorities and Devon County Council regarding the preparation of transport evidence and a Greater Exeter Transport Strategy to underpin planned growth. East Devon forms part of the Exeter Functional Economic Market Area (FEMA) which also includes Exeter, Mid Devon and Teignbridge.
8. Traffic modelling evidence submitted in support of the East Devon Local Plan has been developed in consultation with National Highways, and we are continuing to undertake our own operational assessment work for selected SRN junctions to consider the potential cumulative impacts of growth across the Greater Exeter area. Further modelling has also been undertaken by Devon County Council to consider the impact of Local Plan growth at Honiton and Axminster on the A30 and A35 respectively.
9. The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. Nevertheless, potential significant impacts on the transport network may require highway infrastructure improvements, with the DfT Circular 01/2022 making it clear that *“The policies and allocations that result from plan-making must not compromise the SRN’s prime function to enable the long-distance movement of people and goods”*.
10. Paragraph 29 of the Circular goes on to advise the following in respect of the identification of infrastructure requirements:
“New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.”
11. In line with the vision-led planning approach now enshrined in national policy, Paragraph 33 of the Circular advises that, *“... The company can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. A robust evidence-base will be required, including demand forecasting models, which inform analysis of alternatives*

by accounting for the effects of possible mitigation scenarios that shift demand into less carbon intensive forms of travel”.

12. 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.”* An Infrastructure Delivery Plan (IDP) (dated February 2025) has been submitted in support of the Publication Draft East Devon Local Plan. We understand that the IDP will sit alongside the adopted IDP for the adopted Cranbrook Plan covering the Cranbrook New Community, and that a separate IDP will also be produced for the Second New Community. It is critical that the continuation of transport evidence work in respect of the Second New Community and the Greater Exeter Transport Strategy should inform any necessary updates to the IDPs, to ensure that the identified level of growth can be realised without significant adverse impacts.

Previous Responses and Ongoing Consultations

13. National Highways has provided comments on previous draft versions of the East Devon Local Plan and this response seeks only to build upon previous comments and provide an update on our position in light of ongoing work with the stakeholder authorities.
14. A significant level of development is proposed within the emerging Local Plans for each of the authorities that make up the Exeter functional economic market area (FEMA), with the potential to impact upon the safe and efficient operation of the SRN. Traffic modelling work is ongoing to assess the combined impacts of planned growth, and demonstrate the effectiveness of measures to reduce car-borne travel demand. The work is intended to underpin the Greater Exeter Transport Strategy and Local Plan delivery for the partner authorities. National Highways continues to be a key stakeholder in this process and is contributing its own modelling for the SRN using a microsimulation model of the M5 and A30. We welcome this effective and on-going joint-working to support the production of a positively prepared and justified strategy. However, it is important to note that this work is ongoing and still to be completed and the initiatives, services and schemes contained in the current draft IDP and that for the Second New Community may be insufficient to accommodate the planned level of development.
15. The Greater Exeter Transport Strategy will include a range of service and infrastructure improvements to promote non-car travel. It is critical that this is forward-looking to the ‘Vision’ for future transport as outlined by central government and interpreted locally through the Local Plans. However, National Highways is not currently convinced that a suitable transport strategy to protect the safe and efficient operation of the SRN has been evidenced. Until and unless this is robustly demonstrated we will continue to have reservations over the justification for the planned growth and its delivery. Subject to the future agreement of transport interventions required to deliver the East Devon Local Plan, a robust funding and delivery strategy may need to be identified for any interventions not currently identified in the submitted IDP (dated February 2025). There remains a risk that improvements to the SRN or neighbouring local highway junctions could be required to address the residual cumulative impacts of planned growth.
16. Evidence of cumulative traffic demands associated with emerging Local Plan development across the FEMA authorities (including East Devon) has previously been shared with National Highways by Devon County Council. The modelling accounts for 8,000 new dwellings and associated employment at the Second New Community, alongside wider allocations across East Devon and the Exeter, Teignbridge and Mid Devon authorities. National Highways has subsequently accounted for cumulative traffic growth forecasts in our microsimulation modelling of the M5 and A30. The work reported to Devon County Council and the Local Planning

Authorities has identified significant congestion at M5 J29 and J30, the A30 Airport roundabouts, and the A3052 Clyst St Mary roundabout.

17. Work to assess a range of emerging transport mitigation measures is reported in the Greater Exeter Mitigation Modelling report prepared by WSP and dated 9 December 2024 (TRI-029). It is unclear whether the work directly informs commitments in the current East Devon IDP. The assessment has been undertaken in Devon County Council's SATURN model of the Greater Exeter area, considering cumulative traffic demands associated with growth across the FEMA authorities. Within the conclusions of the report, the following is identified: *"On the eastern side of Exeter around J29 and J30, a number of junctions remain over 100% capacity in the 2040 Core with mitigation scenario. These include movements on J29 and J30 themselves, as well as at Clyst St Mary roundabout and the A30 airport roundabout"*. The report continues to note that operational modelling would be required to confirm junction performance under forecast traffic demands, with the National Highways microsimulation model identified for this purpose. To date, forecast traffic flows accounting for mitigation have not been assessed in the National Highways model, as analysis of the change in traffic demand has identified that currently identified mitigation has little impact on traffic demand via the SRN junctions. The work would suggest that the currently identified mitigations are not sufficiently ambitious to avoid significant impacts for the SRN junctions. Based on discussion with Devon County Council, we understand that further work is to be undertaken to review traffic flow demands and associated transport interventions for the Second New Community site, and this work is awaited by National Highways.

18. Further transport evidence submitted in support of the Publication Draft includes a traffic modelling exercise considering the SRN impacts of planned growth in the towns of Honiton and Axminster (TRI-22). The A30 at Honiton provides two grade separated interchanges, with the Turks Head junction located at the western end of the town and a second interchange with the A35 located at the eastern edge. The A35 provides onward access to Honiton town centre via an at-grade roundabout junction with the High Street. The A35 continues to the immediate south of Axminster and offers three all movement junctions to access the town, known as Yarty Bridge, Abbey Gate and Symonds Lane. National Highways has reviewed the submitted assessment work and is writing separately to East Devon Council and Devon County Council regarding the assessment work undertaken. Key comments include the following, and are reflected in subsequent comments on Policy wording for the Regulation 19 plan, or will be reflected in a future Statement of Common Ground with East Devon Council:
 - Planned development in Honiton will impact the A30 Turks Head junction, A30/ A35 interchange, and A35/ High Street roundabout. Whilst some allocations are carried forward from the adopted Local Plan, they have not yet come forward for development and it is appropriate to consider their cumulative impact. Estimated traffic flow increases at the Turks Head junction peak at 80-90 vehicles per hour for movements to/ from the west. Increases at the A30/ A35 interchange are around half this figure. Whilst the increases are considered unlikely to trigger a requirement for a change in slip road layout – as demonstrated by the Devon County Council work – National Highways will undertake its own review of the continued safety of the slip road layouts given projected increases in demand.
 - No operational assessment has been undertaken for the nearby Exeter Road mini-roundabout. Operation of this roundabout has the potential to generate queuing back towards the A30. It will be imperative that future applications for development in Honiton consider the operation of this junction, to ensure that queuing does not impact on the safety and efficiency of the SRN.
 - Development at the eastern end of Honiton will place further pressure on the A35/ High Street junction. The junction is constrained and will be sensitive to peak hour traffic increases. It will therefore be important to ensure that new development at the eastern end of the town is integrated into existing active travel and public transport networks to avoid car-dependent development.

- Planned development in Axminster will increase turning movements on the high-speed A35. Whilst some allocations are again carried forward from the adopted Local Plan, it is appropriate to consider their cumulative impact. The Abbey Gate and Symonds Lane junctions have both experienced recent collisions involving turning vehicles, albeit neither are currently identified as Accident Cluster Sites by National Highways. Whilst the planned level of growth is unlikely to require strategic transport improvements, it will be important for future planning applications to consider the safety implications of planned growth, and individual allocations may yet require localised works to the SRN to offset any adverse impacts. This should also be a consideration as part of any future assessment of the Axminster Relief Road, which remains a safeguarded ambition of the plan, and could alter traffic demand at the A35 junctions.

Regulation 19 draft Local Plan Comments

19. We have set out our comments regarding the Regulation 19 Publication Draft version of the East Devon Local Plan below, broadly following the structure of the published document:

Overarching Principles

20. The Local Plan Vision of East Devon as a “*diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy*” is supported by 11 objectives which set a framework for the Plan policies. Objective 9 seeks to promote sustainable transport, whilst Objective 10 seeks to secure infrastructure needs at an appropriate time to support new development. Both these objectives are supported by National Highways given the potential impact of new development on future travel demands.
21. The plan vision outlines that the western side of East Devon will continue to be a focal point for growth, with a Second New Community identified to meet the needs of a growing population, and wider growth focussed on the urban fringe of Exeter and the M5 corridor. Overall, 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. Elsewhere, further development is focussed on the Principal Centre of Exmouth, and Main Centres including Honiton and Axminster to serve the needs of the immediate area and surrounding communities.
22. The plan justifies the concentration of development in the West End on the basis of it being a highly sustainable area with strong functional links to Exeter, extensive infrastructure and efficient transport connections. It is also understood that environmental constraints to the east limit the scope for large-scale development.
23. Whilst National Highways recognise that 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 given the proximity of the M5 and A30 Trunk Road, and the potential for cross-boundary movement to/from Exeter in particular. In the absence of appropriate evidence to understand the potential impacts for the SRN, National Highways considers the plan to be unsound and not satisfactorily justified. It is anticipated that the conclusions of the Greater Exeter Transport Strategy work will provide the necessary scrutiny and evidence.
24. Strategic Policy SP02 sets out levels of future housing development, with the target to provide at least 20,909 dwellings (net) between April 2020 and March 2042, at a rate of 850 dwellings per annum to March 2032 and 1,070 dwellings per annum thereafter. Projected build-out from April 2024 is for 22,614 homes, providing headroom to account for possible non-delivery.
25. Strategic Policy SP04 sets out proposed employment provision and a distribution strategy. Around 17.5 hectares (ha) of land for employment is proposed for allocation (up to 2042) at the Second New Community. We anticipate that further details of likely employment uses and build-

out will be set out as part of the forthcoming consultation on the Second New Community. This is in addition to 19.2 ha at the Cranbrook New Community, and a further 90.66 ha proposed for wider allocation.

26. Of the 108 ha proposed for allocation in the Publication Draft plan, allocations in the West End total some 68 ha. West End sites and new communities are indicated to support high-value jobs and strategic inward investment, especially in emerging technology sectors. The West End is also identified to be the focus for General Industrial and Warehousing and Distribution uses, presumably in part due to its proximity to the M5 motorway and Exeter.
27. Overall, the scale and type of employment targeted for the West End has the potential to generate both additional commuter travel demands and longer distance freight journeys via the SRN. Whilst the spatial strategy seeks to capitalise on existing sustainable travel opportunities in Exeter and the West End, we are concerned that the residual car-borne travel demands of such a concentration of development could still be significant. Given current limitations in the evidence for required infrastructure to support this spatial distribution, we believe that the Plan is not satisfactorily justified at this stage.
28. Strategic Policy SP07 relates to the timely delivery of infrastructure to support the needs of development, and identifies the requirement for developers to assess infrastructure needs at the application stage with improvements thereafter delivered either through direct provision or financial contributions. Supporting text refers to various sources of potential infrastructure funding, with paragraph 3.47 advising that *“As the local plan progresses, detailed assessments of infrastructure needs and provision plans will be required”*.
29. National Highways supports the objective of the policy to ensure that infrastructure delivery keeps pace with development build-out, and for applications to consider the long-term maintenance and management of new infrastructure. Nevertheless, it is important to note that the need for strategic transport infrastructure to support delivery of the Local Plan and the Second New Community site in particular is not yet agreed with National Highways, and the Plan is considered unsound pending this evidence.
30. Noting both SP07 and Objective 10 of the Plan seek to secure infrastructure needs at an appropriate time to support new development, it is critical that the strategic transport needs of the plan are understood and agreed at an early stage. Given work on the Greater Exeter Transport Strategy and evidence base for the New Community remains ongoing, it is not yet clear that the published IDP provides a comprehensive assessment of the district’s infrastructure needs and priorities, as is stated in paragraph 3.41 of the publication draft. Further work is needed to inform revisions to the submitted IDP and any separate IDP for the Second New Community. Should physical SRN works be required then it is likely that additional public funding will be necessary.
31. We recommend that the wording of Strategic Policy SP07 should be expanded to refer to transport infrastructure and services identified through the Greater Exeter Transport Strategy or other strategic transport strategies, the role of the individual development in contributing to the outcomes of the strategy, and the potential need to seek other sources of funding should strategic transport infrastructure be required.

Development at the West End

32. We understand that the Cranbrook Plan will continue to apply to development at the Cranbrook New Community. The Cranbrook Plan has an end date of 2031, and it is stated that a new plan will supersede it before then. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes. It is unclear if further expansion of Cranbrook would be targeted in any replacement plan for the area. Should further growth be targeted beyond 8,000 homes then it is

recommended that the review of any additional infrastructure requirements will need to be undertaken as part of the Local Plan review process.

33. The East Devon Options Appraisal Report identified a vision for the Second New Community that included a development embedded in a well-connected and integrated active travel network with comprehensive links to nearby employment, surrounding countryside and the city of Exeter. However, no indication is provided of the proposed access, transport and land use strategy that would deliver travel and transport in accordance with this vision, and limited information has been set out in terms of future travel demands generated by the New Community and how these will be managed and facilitated. We have separately fed comments back to East Devon District Council and Devon County Council on this matter, and expect further information to be included in the Regulation 19 consultation for the site.
34. Strategic Policy WS01 seeks to allocate land for the New Community to accommodate at least 8,000 new homes. However, the policy is clear that the new community will ultimately need to accommodate at least 10,000 new homes. Development build-out to the end of the Local Plan period (2042) is expected to comprise around 3,300 new homes, at least 17.5 hectares of employment land (use classes E, B2 and B8), and at least 5 hectares of operational town centre uses. The Policy goes on to state that beyond 2042, around 4,700 additional new homes will be delivered on allocated land with a further 2,000 homes then required for which land will need to be allocated in subsequent development plans. A further 30 hectares of employment land will also be delivered after 2042, along with a further 10 hectares of town centre uses.
35. In respect of infrastructure, the policy states that the Council will produce an IDP for the New Community. Development proposals will need to accord with an Infrastructure Delivery Strategy (to align with the IDP produced by the Council), an allocation-wide masterplan, and Phasing Strategy. Each planning application will need to incorporate details of development and infrastructure phasing and demonstrate that the development does not compromise the ability to deliver the required infrastructure or prejudice the integration of future development at the new community beyond the plan period. 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.
36. Overall, National Highways reserve the right to comment further on Strategic Policy WS01 once further details are available as part of the Regulation 19 consultation for the New Community. However, we would highlight concern that the need for and detail of strategic transport infrastructure to support delivery of the site is currently unknown. We are aware that Devon County Council are progressing further work in respect of the vision for the New Community and transport evidence base. However, the implications in terms of infrastructure requirements, and the ability to avoid significant adverse impacts to the SRN are currently uncertain.
37. As currently drafted and considered alongside the evidence so far published, the New Community proposal is likely to have a significant and unacceptable adverse impact on the safe and efficient operation of J29 & J30 of the M5 and the A30. Without the identification of appropriate strategy, action and interventions to deliver and subsequently monitor manage future adaptation to achieve the vision statement for the development and the securing of necessary transport interventions in Policy, National Highways considers that the Plan is unsound as it does not comply with national policy as set out in NPPF.
38. Wider employment-led and mixed-use allocations in the West End include the following:
 - Strategic Policy WS02: Development within the designated Enterprise Zone
 - Strategic Policy WS03: Exeter Science Park
 - Strategic Policy WS04: Land north of the Science Park
 - Strategic Policy WS05: Exeter Airport
 - Strategic Policy WS06: Employment land east of Exeter Airport
 - Strategic Policy WS07: Employment land north of the Airport, adjoining Treasbeare

- Strategic Policy WS08: Employment land opposite Airport buildings, south of A30
- Strategic Policy WS10: Development next to the M5 and north of Topsham
- Strategic Policy WS12: Employment land at Sandygate, between M5 and Clyst Road
- Strategic Policy WS13: Employment land at Lodge Trading Estate, Broadclyst
- Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary
- Strategic Policy WS15: Employment land at Darts Farm

39. It is noted that development next to the M5 and north of Topsham would be supported by an agreed masterplan for the whole site and a Development and Infrastructure Delivery Framework to be produced jointly by East Devon District Council and Exeter City Council.
40. The commitment to cross-boundary planning of future infrastructure requirements is welcomed by National Highways. Given the allocation appears to bound the M5 motorway, National Highways would wish to be a partner to the Delivery Framework and would recommend that additional policy wording is included to ensure the safety and integrity of the M5 is appropriately considered as part of future development.
41. Strategic Policy WS10 goes on to advise 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”*.
42. National Highways recommend that this work should be completed prior to examination/ adoption of the plan so that the cumulative infrastructure needs of the area are appropriately understood and planned for.
43. In respect of 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.
44. We recommend that it may be appropriate to include reference to contributing to wider strategic transport improvements that may yet be identified as necessary to support cumulative growth ambitions.
45. Overall, given the scale of development proposed in the West End and its relationship with Exeter and the SRN, National Highways require further evidence to either demonstrate that additional travel demands can be moderated through land use interventions, managed through sustainable transport measures, or that highway improvements can be delivered to mitigate the residual cumulative impact of planned development.

Towns and Villages

46. Outside of the West End, Exmouth carries the largest proportion of new housing and employment land, with allocations totalling around 1,500 new dwellings and 6.7 ha of employment (Strategic Policy SD01). Proposed allocations predominantly focus development on the northern and eastern fringes of the town, remote from the rail station and direct bus links to Exeter. The focus for external commuting and retail trips will continue to be Exeter and employment in the West End. Consequently, it will be vital to deliver sustainable transport measures that improve linkages to existing transport facilities and offer new public transport opportunities, to reduce reliance on the private motor car and avoid unnecessary short distance journeys impacting on the SRN.
47. Strategic Policy SD02 seeks to allocate sites in Axminster for more than 1,000 new dwellings and 4.8 ha of employment land. Selected allocations for land west of Musbury Road (Axmi_01a)

and land east of Musbury Road (Axmi_09) appear to bound the A35 corridor either side of the Abbey Gate junction. The concentration of development alongside the Abbey Gate junction and the high-speed single carriageway nature of the A35 at this location could give rise to road safety issues as a consequence of additional turning movements.

48. It is recommended that the policy wording for proposed allocations Axmi_01a and Axmi_09 should reference the proximity of the SRN and the need for development to avoid any adverse impacts in terms of road safety and National Highways asset. Pedestrian access onto the A35 from neighbouring development sites should also be prevented given the lack of available facilities and the high-speed nature of the road.
49. Strategic Policy SD03 seeks to allocate sites in Honiton for around 800 new homes and 17.9 ha of employment land. The majority of employment land (14.6 ha) is to be allocated at the western end of the town to enable extension of the existing Heath Park Industrial Estate near to the A30 Turks Head grade separated junction. It is noted that the site allocation is carried forward from the adopted Local Plan. Whilst the planned level of growth is considered unlikely to require strategic transport improvements, there is the potential for queuing interaction with the local highway network. It is therefore recommended that the policy wording for proposed allocations Gitti_03, Gitti_04 and Gitti_05 (Land west of Hayne Lane) should reference the need for development to avoid any adverse impacts in terms of SRN safety. Pedestrian access onto the A30 should also be suitably prevented and adequate pedestrian routes should be provided in vicinity of the site to discourage access onto the A30.
50. Residential development at the eastern end of Honiton has the potential to impact on the A35/ High Street mini-roundabout. We therefore support policy wording in respect of maximising opportunities to enhance sustainable travel modes.

Sustainable Transport

51. Strategic Policy TR01 prioritises the provision of facilities for active and sustainable travel modes as part of new development and seeks to align new proposals with existing plans such as the Local Cycling and Walking Infrastructure Plan and Bus Service Improvement Plan. The policy is supported by National Highways.
52. 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. Protected sites and routes of interest to National Highways include the Cranbrook to Exeter cycle route, rail passing loops between Honiton and Cranbrook, a bus priority route on approach to M5 J30 and improvements to the Clyst St Mary roundabout, improvements to the A30 Airport junction, and the route of the Axminster relief road.
53. The policy is supported by National Highways, but we recommend that East Devon District Council commit to strong cross-boundary working with neighbouring authorities (particularly Exeter City Council and Devon County Council) where routes would facilitate cross-boundary travel. Any further transport sites and routes identified as part of ongoing work on the Greater Exeter Transport Strategy should also be included in the final policy wording, and as necessary should also be identified in the IDP. This is particularly relevant for the Second New Community where the vision for the site should promote sustainable travel to nearby areas of employment and transport facilities.
54. Strategic Policy TR03 identifies the need to prepare a Travel Plan, Transport Statement or Transport Assessment for developments likely to generate significant amounts of vehicle movements.
55. The policy does not define what represents a 'significant amount' and it would be helpful if guidance was provided. We consider that the requirement should be extended to people

movements rather than just vehicle movements. Reference to the need for a 'vision-led' transport statement or transport assessment, and the need to monitor travel outcomes through the Travel Plan process could also be included to reflect latest guidance set out in the National Planning Policy Framework (NPPF).

56. Whilst the focus of Strategic Policy TR03 is in terms of sustainable travel arrangements, it should also reference the potential need for assessments to identify measures that mitigate highway safety concerns or adverse impacts associated with additional traffic demand. As is noted in supporting text at paragraph 11.14 of the publication draft, new developments will still generate car travel, especially in rural East Devon, necessitating policies to address transport network impacts.
57. It is recommended that the current wording of TR03 could be amended to better address the risk that sustainable travel measures are insufficient to address highway impacts, with highway improvements therefore required to address residual impacts or remedial issues identified through monitoring.
58. Strategic Policy TR04 sets out minimum car parking standards for new development. Whilst we recognise that the policy wording permits the submission of evidence to demonstrate that a different provision is more appropriate, we have concern that minimum standards for selected uses could be considered high. The availability of parking is a significant factor influencing mode choice and is a key lever in the successful implementation of a vision-led approach.

Implementation and Monitoring

59. The publication draft plan advises that each policy should outline intended outcomes and how success will be monitored. Various monitoring reports are listed, but there is no reference to ongoing monitoring of the traffic and transport impacts of Local Plan implementation.
60. It is an objective of the Local Plan to promote sustainable transport, and we would therefore strongly recommend that additional reference is made to the monitoring of development Travel Plans and the outcomes of the emerging Greater Exeter Transport Strategy to ensure that the effectiveness of these strategies can be kept under review. Without such monitoring it will not be possible to determine whether the Authority has been successful in delivering increases in sustainable travel or whether further action is required to achieve the shift in travel modes.
61. Given the potential for the Second New Community site to have significant impacts for the SRN, we would also recommend that a comprehensive monitoring strategy be developed for the site to inform the phased build-out of development and parallel implementation of transport infrastructure improvements. Build-out of the development will take place over decades and assessment work to inform infrastructure requirements will need to consider a range of possible future scenarios. It is recommended that comprehensive monitoring of travel demands and transport outcomes should be undertaken to inform and review future development and infrastructure decisions.

Summary

62. National Highways welcome the opportunity to comment on the Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042. The Plan includes significant growth in the West End area located close to the boundary with Exeter City and key SRN routes in the form of 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 strengthens the need for an ambitious strategy to accommodate future travel demands across the Exeter travel to work area.

63. We welcome plan objectives to promote sustainable transport and ensure that infrastructure delivery keeps pace with the build-out of site allocations. Nevertheless, we have concern that there is a limited evidence base for the cumulative transport impacts of development in the West End and the Second New Community in particular.
64. National Highways is committed to continue working collaboratively with East Devon District Council and Devon County Council on the development of a Greater Exeter Transport Strategy and transport evidence for the Local Plan and Second New Community. However, on the basis of currently available evidence, we have concern whether identified measures to promote sustainable transport are sufficient to avoid significant impacts on the SRN. For this reason, the Publication Draft plan should be considered unsound, on the basis that the development strategy is not informed by proportionate evidence in respect of potential transport impacts and infrastructure requirements.
65. We look forward to reviewing additional material specific to the Second New Community, which we understand will be forthcoming as part of a separate Regulation 19 consultation event for the proposed allocation. Whilst work to date on the Greater Exeter Transport Strategy has informed the current IDP, subsequent amendments may be required to reflect any future agreement of measures identified as part of the final Transport Strategy and Second New Community assessment work. This could potentially include works to the SRN, which would be likely to require additional public funding.
66. In respect of current policies and the future monitoring and implementation of the Plan, National Highway recommends the adoption of a 'monitor and manage' approach, whereby the outcomes of sustainable transport measures and implications for the operation of the SRN are monitored going forwards to inform future Local Plan reviews and the phased delivery of the Second New Community site. The Transport Strategy should seek ambitious modal shift and investment in provision for active travel, bus and rail travel, with a view to limiting the need for costly improvements to the SRN which may delay the build-out of planned development growth. We would therefore recommend that policies within the East Devon Local Plan include additional references to the Transport Strategy, uncertainty over required infrastructure improvements and funding, and the need to comprehensively monitor future travel outcomes. These requirements should all inform future reviews of the Local Plan and associated infrastructure planning.
67. 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.

Yours sincerely



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