

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

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

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

This form has two parts:

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

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

Part A: Personal details

1. Personal details*

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

Title

Mr

First Name

Nigel

Last Name

FitzHugh

Job Title (where relevant)

Chairman

Organisation (where relevant)

St Leonards Neighbourhood Association

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

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

Paragraph Policy Policies Map

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

Yes No

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

Yes

☐

No

☒

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

ECC 's failure to process to our request to designate part of the grounds of County Hall as a Local Green Space.

See next page for details

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

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

(Continue on a separate sheet if necessary)

To consider the request of the St Leonards neighbourhood Association to designate the grounds of County Hall (as shown in the attached document) as a Local Green Space.

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

Yes

☒

No

☐

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

(Continue on a separate sheet if necessary)

Exeter City Council's failure to process to St Leonards Neighbourhood Association's request to designate part of the grounds of County Hall as a Local Green Space.

There is no laid down procedure or form for making an application to designate a piece of land as a Local Green Space, different Local Authorities have their own procedures, it seems that ECC doesn't. In early September 2024, during the development of the draft Local Plan, the St Leonards Neighbourhood Association (SLNA) asked the ECC what information they required in order to consider the designation of a piece of land as an LGS. It was not until the end of October that a response was received asking for 'clarification of the extent of the land in question', this information had already been sent, but in the mean time the SLNA carried out research into LGS criteria and, on the 28th October, furnished ECC with information as to how the County Hall Grounds fulfilled the criteria, (document attached see below). On the 19th November ECC responded, saying that as the final draft document had to be completed by the 12th December and 'what little staff there are, are working at full capacity' the request would not be evaluated at this time.

The SLNA were advised to make representations in the Regulation 19 consultation period and the representations would be forwarded to the Independent Planning Inspector.

We believe that our request would have given enough information and time to decide on an LGS designation and that, in this case, having to make a Regulation 19 request is evidence of UNSOUND processes. However, as a request for Local Green Space designation can only be made when a Local Plan is being drafted, we are pleased that this representation can be made and we trust and hope that the inspector can recommend our request for inclusion.

Document attached (LGS application 28/10/24 - as referenced above) - Should this document become separated from this representation form it can be found at:-

<https://www.dropbox.com/scl/fi/1orm7qcu1ddi1bq0fv9ng/LETTER-TO-ECC-re-LGS-application-28-10-24.pdf?rlkey=ops3j2tcd9x78tdvh76z8rskj&dl=0>

THIS REPRESENTATION, ALONG WITH TWO OTHERS FROM THE ST LEONARDS NEIGHBOURHOOD ASSOCIATION MADE AT THE SAME TIME, IS SUPPORTED BY OVER 260 RESIDENTS AND USERS OF THE COUNTY HALL GROUNDS. NAMES AND EMAIL ADDRESSES CAN BE SUPPLIED ON REQUEST.

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

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

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

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

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

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

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

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

☒

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

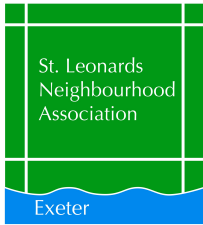
☐

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

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Continue on a separate sheet if necessary)

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

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



St Leonard's Neighbourhood Association

www.slina.org.uk

Charity Reg. No. 283568

Roger Clotworthy,
Head of Service - City Development
Exeter City Council.

Cc. Cllr Matt Vizard, Cllr Andrew Ketchin, Cllr Lynn Wetenhall, Cllr Carol Whitton.

28th October 2024

Dear Roger,

As I mentioned to you in the email of today I am laying out here the reasons why we would like the Exeter City Council to designate County Hall Grounds as a Local Green Space.

Background and reasoning for the community to be requesting this designation:-

This request from the SLNA to the ECC maybe being made towards the end of the lengthy consultation process of drafting the Exeter Plan, but the urgency of the application is because of the very recent pronouncements by the owners of the land in question, Devon County Council (DCC). At the present time the financial positions of many Local Authorities is uncertain and DCC is no exception, they have made it clear that they are keen to dispose of underused assets as well as admitting that the office space in the Grade II* listed premises of County Hall is under-occupied. Whatever it is used for in the future the listing of the building will protect it from alteration, but the land it stands within is only designated as an Amenity Green Space in the draft Exeter Plan, according to the NPPF this designation is not as strong a protection against future changes as that of a Local Green Space designation.

For those reasons, and more below, we feel that the County Hall Grounds should be protected as securely as the wonderful County Hall buildings.

The criteria necessary for qualification as a Local Green Space according to the NPPF guidelines are that it is:-

(a) in reasonably close proximity to the community it serves;

(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

(c) local in character and is not an extensive tract of land.

Close proximity to the area it serves.

The community area of St Leonards, as delineated by the SLNA, follows an old boundary which has part of St David's ECC Ward and part of Newtown & St Leonards ECC Ward, it encompasses 3200 dwellings. The boundary area is shown in the plan attached. The County Hall grounds, owned by Devon County Council are within the boundaries of this community area.

In a recent local survey (charts shown in an attachment), which has returned 860 responses to date:-

- 96.2 % did use the grounds for recreational activities.
- 77.4% visited the site once a week or more.
- 89% lived within a 15 minute walk.
- 64.7% have used the grounds for longer than 8 years.

Demonstrably special to the local community.

In the above referenced survey:-

- When asked how much they value the existence of the grounds on a scale of 1 to 6 (1 'I'm not bothered' to 6 'I would hate to lose it') 93.9% of respondents chose 6,
- Some of the most popular examples of reasons for their appreciation were given as:- Tranquillity & beauty; Historic setting, Dog walking, Organised sports, Community meeting place.
- The cricket pitch is used by three cricket clubs in the summer months. On days when matches are being played the spectators sit in the grounds with their refreshments enjoying the sunshine and the green and verdant views in a very traditional way.
- There are regular Volleyball competitions on the grassy areas outside the Coaver Club and many of the activities organised by the club take place outside

the building. The club prides itself on how it reaches out to the community of St Leonards, which is one of a restricted number of group classifications which is allowed membership.

- At school 'coming-out time' many of the parents and children of the St Leonards Primary School use the grounds to 'let off steam' after the controls of the day. A spectacle which needs witnessing to believe!

The grounds' recreational value (including as a playing field) is demonstrably demonstrated by the above analysis.

Historic Significance

A leaflet produced by Devon County Council explaining the history of the County Hall site is attached here, the salient points regarding the history of the site are:-

- The site was important in Saxon times and part of the large royal estate of Wonford.
- The landscaping of the grounds reflects the Edwardian tradition established by Edwin Lutyens. Holm Oaks, Magnolias, Monterey Pine, and a Maiden Hair tree are among the unusual plants in the grounds.
- Coaver House was built in the 19th century and was the home to The Milford family who ran Exeter's City Bank.
- Bellair - Built around 1710 in Queen Anne style and once home to Dame Georgiana Buller, there is a blue plaque on the building to commemorate this.
- A map showing the layout of the land in the late 19th century is also attached.
- The Conservation Area Appraisal states:-

"The Grade 2 County Hall building itself, Bellair, the original villa (Listed Grade 2*) and the locally listed Coaver Club building. These buildings are set within superb landscaped grounds, including mature Lucombe oaks and sweeping lawns, providing an exceptional setting for the historic buildings. The Heavitree stone wall to Topsham Road is a reminder of the original enclosure of this area."*

Rich In Wildlife

The mature trees and undergrowth surrounding the site provide a home for foxes, squirrels, bats, tawny owls, and smaller associated wildlife.

Local in character and is not an extensive tract of land.

The responses to the survey and the map attachments make it very clear how 'local' the site is. 89% of respondents who use and value the site live within a 15 minute walk of the County Hall grounds.

The land area covered by the request for designation is not 'extensive' at 3.35 Hectares. See the attached boundary plan, the inclusion of 'The Paddock', the area of land on the corner of Matford Lane and Matford Avenue and the tree-covered 'walkway' between the two areas is also an extremely important part of the whole as they fit all the same criteria for an LGS as the rest of the site.

I do hope that this analysis of the County Hall grounds, with reference to the criteria for designation as a Local Green Space, will help Exeter City Council to further it's inclusion in the Exeter Plan which is being drafted at the moment.

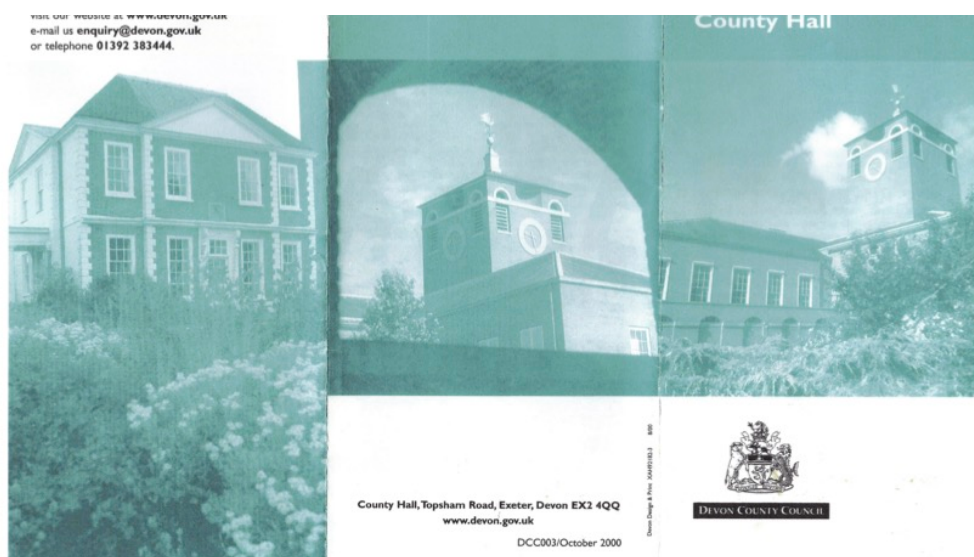
Kind regards,

Nigel FitzHugh

Chairman.

Attachments:-

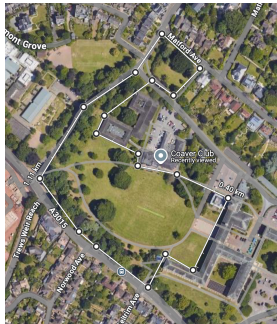
1. DCC County Hall leaflet.
2. Historic map + map showing area of application + boundary of SLNA area.
3. Analysis of the responses to our survey. The survey is still open to responses and will continue to be so for the period of this application.



document to be attached to LGS application.

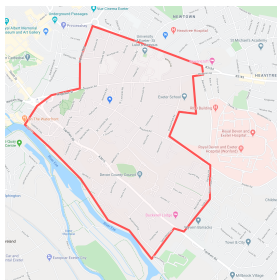


Map of the grounds of Coaver House and Bellair in the late 19th century



Map showing the area covered by the LGS application.

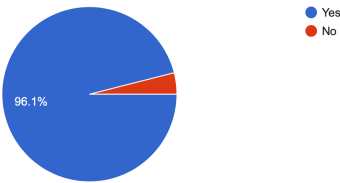
8.28 acres
3.35 Hectares



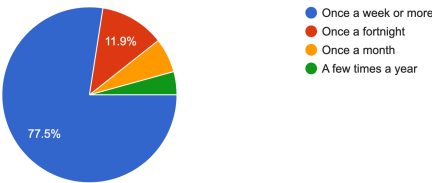
Map showing area covered by the St Leonards Neighbourhood Association.

THAT FOLLOWING CHARTS ARE ANALYSIS TO SUPPORT THE TEXT IN THE LETTER OF APPLICATION.
The survey has gathered the names and contact details of each respondent.

Do you use the grounds of County Hall grounds for any recreational activities?
861 responses



How often do you visit the County Hall site?
821 responses



How long does it take you to walk to County Hall from your home?
824 responses

