

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	Miss
First Name	Natasha
Last Name	Styles
Job Title (where relevant)	Senior Planning Associate
Organisation (where relevant)	The Planning Bureau Limited
Address Line 1	100 Holdenhurst Road
Line 2	Bournemouth
Line 3	
Line 4	

Post Code

BH8 8AQ

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?

Representation regarding the Land at the former Bramdean school between Goldsmith Street and Homefield Road

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

No

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

(Continue on a separate sheet if necessary)

N/A

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

(Continue on a separate sheet if necessary)

Exeter Policies Map and former Land at the former Bramdean school between Goldsmith Street and Homefield Road – Policy IF4

We note that the school playing fields at the former Bramdean School between Goldsmith Street and Homefield Road continue to be identified on the Submission Draft Local Plan Policies Map as ‘Open Space, Play Areas, Allotments and Sports’. As such draft policy IF4 is then relevant to the land.



Policy IF4 protects ‘Existing open space, play areas, local green spaces, allotments, playing pitches and sports facilities’. Bramdean School, before its closure in 2020, was an independent / private school. The area of land in

question is in private ownership and has never historically been available to the general public for sports, recreational or general public open space use and is therefore not available. The total site area measures 0.5 hectares and measures approximately 80 metres by 60 metres at its narrowest point.

We note that the former playing field at Bramdean school has also been included in the Exeter Playing Pitch Strategy, October 2022.

Para 1.5 of this document confirms when disposal of a playing field is appropriate, and this includes **‘that the proposed development affects only land incapable of forming part of a playing pitch’**. It is noted that para 2.18 of the Playing Pitch Strategy states:

‘access of up to the equivalent of a minimum of an additional 7 x Youth 11v11 and 5 x 9v9 pitches will be required, ideally on sites which are able to accommodate a range of pitch sizes.....

.....There is potential for greater community use at a small number of other schools, notably the new Monkerton Community Primary School and the playing field at the former Bramdean School (now closed).’

This same paragraph lists order of priority for a number of sites to be bought back into use for youth football. Bramdean school sits at the bottom of this list of 9.

Football pitch areas are confirmed in the Playing Pitch Strategy Glossary of Terms and Pitch Sizes in Table 2. This confirms the following pitch areas are needed for football pitches. This does not include run-off or ancillary facilities such as parking, toilet and storage facilities.

For reference, playing pitch areas (including run offs, excluding ancillary facilities) are:

Glossary Table 2 AREA AND DIMENSIONS OF PLAYING PITCHES BY SPORT

	Type	Age Range	Overall Space	Hectares
Football	5v5	U7, U8	43m x 33m	0.14
	7v7	U9, U10	61m x 43m	0.26
	9v9	U11, U12	79m x 52m	0.41
	Youth 11v11	U13, U14	88m x 56m	0.49
	Youth 11v11	U15, U16	97m x 61m	0.59
	Adult	U17 upwards	106m x 70m	0.74
Cricket	Full pitch	All	111.56m x 115.84m	1.29
Rugby Union	Youth	U12 and below	80m x 53m	0.42

*Source: Comparative Sizes of Sports Pitches & Courts (OUTDOOR) September 2015 Update – Sport England

This therefore identifies that for a youth football pitch for 9v9 a pitch area of 0.41 ha is needed with space of 79 metres x 52 metres. This excludes any run-offs, car parking or other facilities such as toilets. The land in question is therefore too narrow and small for the youth football pitches identified in the Playing Pitch Strategy. The consultants in undertaking their Playing Pitch Strategy and assessment of sites, clearly did not visit or measure sites. If they had done, they would have identified that the land between Goldsmith Street and Homefield Road is too small to fit the football pitches needed. In addition, the site is not available as it is private land that has never been available for public use. The site should therefore be removed from the policies map as of the land is not suitable for Open Space, Play Areas, Allotments and Sports’ as it is clearly not capable of delivering a sports pitch (large enough) or available for this purpose. In addition, it is noted that general playing pitch provision is within the Infrastructure Delivery plan but no cost is provided.

Para 32 of NPPF states:

‘The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals’.

Para 35 of the NPPF details the tests of soundness that Local Plans will be assessed against at examination in public. This requires plans to be justified based on proportionate evidence and effective or deliverable over the plan period as well as consistent with national policy.

The evidence put forward with regard to the capability of Land between Goldsmith Street and Homefield Road to accommodate a playing pitch (in particularly youth football) is not robust as it is clear that the area of land is too small to accommodate such provision. In addition, it is not deliverable as the land is in private ownership. The identification for the land for Open Space, Play Areas, Allotments and Sports' is therefore not justified and deliverable and therefore contrary to the requirements of the NPPF.

Recommendation

Land at the former Bramdean school between Goldsmith Street and Homefield Road should be removed from the policies map as an area for Open Space, Play Areas, Allotments and Sports as its inclusion is not justified as it is incapable of forming part of a playing pitch. The site is not available for such a use and is not large enough to accommodate the requirement for youth pitches as required in the Playing Pitch Strategy.

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)

Recommendation

Land at the former Bramdean school between Goldsmith Street and Homefield Road should be removed from the policies map as an area for Open Space, Play Areas, Allotments and Sports as its inclusion is not justified as it is incapable of forming part of a playing pitch. The site is not available for such a use and is not large enough to accommodate the requirement for youth pitches as required in the Playing Pitch Strategy.

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)

N/A

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

(Continue on a separate sheet if necessary)

N/A

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

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

(Continue on a separate sheet if necessary)

N/A

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

(Continue on a separate sheet if necessary)

N/A

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

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

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

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

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

Yes

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

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

(Continue on a separate sheet if necessary)

To ensure that the plan is justified, effective and consistent with national policy.

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>