

Full Name

**Emma Townsend**

Organisation (where relevant)

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Chapter of the Exeter Plan

**Chapter 15 - Infrastructure and facilities**

1. To which part of this chapter does this representation relate? (Representations must be made on a specific policy or paragraph within the section and this should be specified in the below).

**Section 15.36**

2. Do you consider that this part of the chapter is legally compliant?

**Yes**

2.a. If yes, and you wish to support the legal compliance of this part of the chapter, please use this box to set out your comments.

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2.b. If no, please give details of why you consider this part of the chapter is not legally compliant. Please be as precise as possible.

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2.c. Please set out the modification(s) you consider necessary to make this part of the chapter legally compliant, in respect of any legal compliance matters you have identified at 2.b above. You will need to say why each modification will make this part of the chapter

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.

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3. Do you consider that this part of the chapter is sound?

**No**

3.a. If yes, and you wish to support the soundness of this part of the chapter, please use this box to set out your comments.

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3.b. If no, please give details of why you consider this part of the chapter is unsound. Please be as precise as possible.

**Response from Alphington Village Forum.**

**AVF were heavily involved with Exeter Council in the development of the South West Exeter Development Brief SPD (2014). This took the form of a series of meetings with the AVF committee and local residents. We therefore consider that ECC have not met their 'duty to cooperate' re section 15.36 on page 131, regarding the site for allotments on Shillingford Road. We also consider this change is not justified by evidence provided with the consultation draft plan.**

**Within the SW Exeter Development Brief, the allocated site for allotments on Shillingford Road is excluded from the strategic allocation (footnote page 2). The development brief and accompanying Adoption Statement (June 2014) clearly sets out the justification of the provision of this land for allotments with reference to Core Strategy Policy CP17. This site in particular was selected due to it being of an appropriate size, most affected by traffic noise from the A30 and also the most elevated and therefore most visually sensitive.**

**We object that the consultation draft of the Exeter Plan in section 15.36 includes the following statement regarding the site on Shillingford Road - 'Some small scale, modest enabling development may be appropriate on a part of this site if it were to support delivery of allotments here'. We consider that due to the high level of previous collaboration with AVF, Exeter City Council should have consulted AVF on this proposal to deviate from the SW Exeter Development Brief. All of the 0.37ha site should be used for allotments, especially taking into account the long waiting lists**

**across the city quoted in section 15.35 (800 people on list in 2023). Within the two allotments already in Alphington, 83 of the 101 plots are held by Alphington residents (ref FOI FS675851520). This demonstrates a local need for allotments from existing residents and with more housing still to be built, this need will not reduce. If there is a challenge re a developer funding and taking on the responsibility to bring forwards the allotments, then we request that an alternative to allowing part of the site to be used for housing should be sought.**

3.c. Please set out the modification(s) you consider necessary to make this part of the chapter sound, in respect of any soundness matters you have identified at 3.b above. You will need to say why each modification will make this part of the chapter 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.

**Remove reference to the 'modest enabling development" with reference to the Shillingford Road allotments.**

4. Do you consider that this part of the chapter complies with the Duty to Co-operate?

**No**

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

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

**Alphington Village Forum were not approached directly re this change in the SPD for South West Exeter.**

5. 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)**

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

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