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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	Councillor
First Name	Diana
Last Name	Moore
Job Title (where relevant)	Leader of Green Group. Submissions on behalf of Cllrs Banyard, Read, Rees, Bennet, Wetenhall, Ketchin.
Organisation (where relevant)	Exeter City Council
Address Line 1	% Civic Centre
Line 2	Paris St
Line 3	Exeter



Line 4

Post Code

EX1 1JN

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	15.28	Policy	Section 15. Objective & policy IF4	Policies Map	
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4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes		No	
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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)

Failure to carry out an assessment of prospective Local Green Space sites / small green spaces.

Part of the **objective for Chapter 15** includes the aspiration of *‘protecting existing services that play an essential role in the lives of our residents’*; (‘services’ in this chapter includes open spaces).

Exeter City Council has never carried out an assessment of Local Green Space (LGS) sites, despite such designations being a strong way of protecting green space sites that might otherwise be at risk of development encroachments. Other Councils have done LGS reviews as part of their Local Plan evidence base - we believe that Exeter should have also done so. If the Council is not aware of which existing open spaces might benefit from the status of LGS designation, and has not made suitable designations, how can they deliver the aspiration of protecting those spaces to the best of their ability?

The baseline evidence on Green Infrastructure for the draft Plan is lacking any up to date review of small, local green spaces, focusing instead on the specifics of trees, the valley parks and landscape impacts. A recent report to the City Council from Historic England, confirms this gap in the information base, saying that :

"The Historic Places Panel was invited to Exeter at this pivotal moment to provide its recommendations on what it believes is needed for Exeter City Council to deliver an exceptional transformation of the city. Our recommendations are focussed on providing that springboard for delivery, and include:

- ***Ensuring the right skills, capacity, and baseline studies are available to enable the successful delivery of its vision. [.....]; an updated green infrastructure study*** would clarify and support the delivery of the city's carbon neutral targets.¹

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)

1. Carry out a review of prospective Local Green Space sites in order to inform the emerging Parks and Greenspaces strategy
2. Update the evidence base to show the current provision of smaller green spaces of all designations, including none.
3. Designate sites deemed to meet the criteria

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)

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)

¹ <https://historicengland.org.uk/whats-new/in-your-area/south-west/historic-places-panel-unlocking-heritage-exeter/#:~:text=A%20team%20of%20national%20experts,to%20help%20fuel%20its%20regeneration.>

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)

The SA highlights The Council's Green Infrastructure Strategy (December 2009), however this is somewhat out of date and does not respond to current policy for example the Natural England, Green Infrastructure Framework (2023) which aims to help increase the amount of green cover to 40% in urban residential areas (B.47 p 355) however it notes how out of date existing Council strategies are in regard to local and green spaces: *"The Parks and Open Spaces Strategy dates back to 2005 and is currently in the process of being updated with a new Parks and Greenspace Strategy"* - no publication date is known. Enquiries on the emerging strategy have found *"There is scope to join up smaller green spaces to form larger green corridors with active recreation and habitat benefits;"*

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)

As councillors (some of whom have sat on the planning committee) we have experience of trying to work with planning policy in practice and how planning decisions are taken within the Council.

As ward Councillors we have experience of how planning policy affects the community and local environment and the extent to which it may or may not be effective in achieving the stated policy outcomes. We are also advocates for our communities and have identified where planning policies are not effective in terms of meeting positive planning outcomes for our communities and local environment.

The issues we have commented on in these representations are ones which concern us most (having made previous representations). However, it should be noted that, there has been no opportunity for formal Scrutiny (as set out in the Local Government Act) of the local plan policies, despite our numerous formal requests. While the strategic direction was set by the administration and approved by Council it should be noted that the emerging plan policies have not subject to any formal political oversight, for example in a council strategic planning committee. Our group has objected to the process. We are therefore having to make a number of representations to the Inspector on the matters that will have the most impact on our communities and environment.

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>

Roger Clotworthy

☐Reply

☐Reply all

☐Forward

To: [REDACTED] <stleonardsnassoc@gmail.com>

Cc: Cllr Naima Allcock; CLLR Andy Ketchin; Cllr Matthew Vizard; CLLR Lynn Wetenhall

Tue 19/11/2024 17:15

Dear Mr [REDACTED]

Thank you for your recent correspondence regarding the potential designation of part of the County Hall grounds as a Local Green Space (LGS) in the Exeter Plan. We appreciate the community's commitment to protecting this area and the detailed information and evidence provided to support your request.

Timescales and Designation Process

As you know, the Local Green Space designation process involves a thorough assessment against criteria set out in the National Planning Policy Framework (NPPF). The NPPF, paragraph 102, indicates that a site must be "reasonably close to the community it serves," "demonstrably special to a local community," and "local in character and not an extensive tract of land."

Regarding timing, we only recently received the detailed plans for the proposed LGS area on 28 October. Given that we are in the final stages of preparing the Exeter Plan for publication on 12 December, there is not enough time to incorporate this new request. Staff are working at full capacity to finalise the text and supporting documentation, which precludes undertaking the necessary assessments and consultations to evaluate the LGS designation request.

Required Steps for LGS Inclusion in the Exeter Plan

For an LGS designation to be included in the Exeter Plan, the Council would need to:

1. **Assess the Site's Suitability:** Evaluate the area against NPPF criteria, ensuring it meets requirements for community proximity, local significance, and appropriate scale.
2. **Compile Community Evidence:** Evidence of strong local support and specific uses or values (such as recreational or historic significance) would be required to demonstrate that the site meets the criteria.

3. **Engage with Landowners:** As Devon County Council owns the site, their views and any planned uses for the site would need to be considered in the assessment process.

Options for St Leonard's Neighbourhood Association

While it is not feasible to incorporate the LGS designation request in the current Exeter Plan draft, there are several options available to the Association:

1. **Submit Representations During the Regulation 19 Consultation:** When the Regulation 19 consultation for the Exeter Plan opens in December, you could make formal representations. All representations will be forwarded to the independent planning inspector, who will consider the evidence and determine if the request should be recommended for inclusion.
2. **Prepare a Neighbourhood Plan:** The Association may consider developing a neighbourhood plan, which could include the proposed LGS designation. Neighbourhood plans allow communities to protect valued green spaces if they meet the NPPF's criteria, and an adopted neighbourhood plan has the same legal status as the Local Plan in planning decisions.
3. **Engage with Devon County Council:** As landowners, Devon County Council's support could be instrumental. We recommend reaching out to discuss the community's aspirations for the grounds and explore any protections they might consider.

We hope this clarifies the process and timeline considerations. If it would be helpful, we would be happy to arrange a meeting to discuss this further.

Please feel free to ask any further questions regarding the representation process or neighbourhood planning.

Thank you again for your dedication to preserving Exeter's green spaces.

Kind regards,

Roger

Roger Clotworthy (*he/him*)

Head of City Development

Exeter City Council

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