

St Leonard's Neighbourhood Association

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Paul Jeffery,
Case Officer,
Exeter City Planning Department,

Re. Planning application number: 19/1047 'Land Off St Leonards Road.'

Dear Mr Jeffery,

I am writing on behalf of the St Leonards Neighbourhood Association (SLNA) to oppose the above referenced planning application by Exeter Deaf Academy (EDA) to develop Mount Radford Lawn Playing Field for housing.

Our objections fall under three main headings;

- Loss of a playing field and the National and Local Government policies which that loss would contravene.
- Its affect on the Conservation area within which it sits.
- The results of a survey of the community opinions made recently.

We are not going to comment on the look, scale, layout or other aspects related to the housing development itself as we are opposed to any housing development on this site. Our main argument is a positive one in that the playing field is already a needed resource and can, in the future, help to fulfil ECC's plans for a City which can "Live Better".

We are anxious to keep this letter as short and to-the-point as we can, but it is hard not to point out all the National and Local policies which this application would contravene without it becoming exceedingly long.

Our evidence, shown below, is drawn from four main sources:

- I. Exeter City Council's 'built-facilities-playing-fields-pitches-play-areas-parks-and-green-spaces-strategy-july-2019'
- II. Exeter City Council's 'playing-pitch-strategy-2017-2016-final-draft-feb-2018-continuum.'
- III. Sport England's (& NPPF) 'Playing Fields Policy and Guidance'.
- IV. Exeter City's Core Strategy Document.
- V. The Conservation Area Appraisal - St Leonards

Community survey:-

An online survey and two paper surveys have resulted in 509 responses. A brief analysis of results is:-

- 4 people wanted the field to be developed for housing
- the remainder said they wanted, "The field to be used for a playing field with changing facilities and a community meeting space, similar to the design in the vision document."

and "I urge the Exeter City Council to protect Mount Radford Lawn from development for housing and keep it as community asset along the lines of the 'Vision Document' as put forward by the SLNA."

- 44.7% are members of a club or group which meets at an indoor venue on a regular basis and 74% or those could envisage bringing their club to the new community centre.
- 274 said that they took regular outdoor exercise.
- 163 replies to the request, "If you would like to say what you think of SLNA's vision for the future of Mount Radford Lawn please write it here." can be seen at [THIS LINK](#).

The table below lists, under each heading, policy statements which this proposed development would contravene.

Exeter City Council's 'built-facilities-playing-fields-pitches-play-areas-parks-and-green-spaces-strategy-july-2019'			
PLAYING PITCH NEEDS FORECAST			
Pitch Sport	No.of Secured Pitches	No. Required by 2026*	Difference
Cricket	11	13	2
Adult Football	24	27	3
Youth Football	6	13 (mix of 9v9,11v11)	7
Mini Soccer	12	14 (mix of 5v5,7v7)	2
Adult/Youth Rugby	6	7/8	+1/2
Midi/Mini Rugby	3	6	3
	"A shortage of both grass and artificial grass pitches to meet current demand and expanding population growth."		
	"Supports an interest in exploring <u>alternative community management models</u> or community asset transfer for specific sites."		
Exeter City Council's 'playing-pitch-strategy-2017-2016-final-draft-feb-2018-continuum.'			
	"Is there enough accessible and secured community use provision to meet current demand? NO." (This is in relation to Mini football and Mini rugby)		

	<p>“While the City Council has successfully worked with the Devon FA, local leagues and clubs in recent years to mark out more small sided pitches on its playing field sites to provide for changes in the ways the game is played following the FA Youth Football Review, there remains a particular supply issue with regard to youth 11v11 size pitches. Most youth teams are either playing on adult pitches in the City, or are being displaced to youth 11v11 pitches outside the City.”</p>
	<p>“Is there enough accessible and secured community use provision to meet future demand? NO”</p>
	<p>“Over the period of the strategy to 2026 it is considered likely that demand for non-traditional sports - particularly those that are easy to play, accessible and inclusive such as ultimate frisbee, rounders and the adult touch and TAG forms of rugby is likely to continue to grow.”</p>
	<p>“Therefore in the case of all playing field sites in the City, it is recommended that NPPF Policy Paragraph 74 and policy CP10 of the Exeter Core Strategy 2012 continue to be applied. In this context the ERADE (Exeter Royal Academy for Deaf Education) School's playing field has been identified in consultation as at risk because it is no longer in use and the school is in the process of relocating outside the City. <u>Should a playing field/pitch exist in Exeter City that is not mentioned in this Playing Pitch Strategy, its omission is not an endorsement by Sport England or the relevant national governing body of that sport, of its disposal.</u>”</p>
	<p>“...there is no surplus of playing pitches in the City.”</p>
<p>Sport England’s (& NPPF) ‘Playing Fields Policy and Guidance’.</p>	
	<p>“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field <p>unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.”</p> <p>It does not meet any of those exceptions.</p>

	<p>“The Town and Country Planning (Development Management Procedure) (England) Order 2015 (“the 2015 Order”) states that a local planning authority shall consult Sport England on “development which: is <u>used</u> as a playing field at any time in the five years before the making of the relevant application and which remains undeveloped;”</p>
	<p>“A lack of use of a playing field, or part of, should not be taken as necessarily indicating an absence of need in an area. Such land can retain the potential to provide playing pitches to meet current or future needs. In line with the requirements of the 2015 Order, if such land was used as a playing field at any time in the five years before the making of a relevant planning application, then Sport England should be consulted as a statutory consultee.”</p>
<p>Exeter City’s Core Strategy Document.</p>	
	<p>CP10: Facilities that meet Exeter’s community, social, health, welfare, education, spiritual, cultural, leisure and recreation needs <u>will be protected</u>. New and <u>improved community facilities</u> and utilities infrastructure must be provided in a timely manner to meet the needs of new development, make a positive contribution towards safeguarding and creating sustainable communities, promote social inclusion and reduce deprivation. Facilities which serve the city as a whole should be located in the City Centre or, if this is not feasible, at sustainable locations which are readily accessible by all modes of travel, particularly public transport. Facilities which serve neighbourhood needs should, wherever possible, be located within or close to district or local centres or at locations easily accessible to the local community, particularly by foot or bicycle.</p>
<p>Conservation Area Appraisal - St Leonards</p>	
	<p>12.8 Mount Radford Lawn, now used as a school playing field is the only remaining area of the landscaped parkland that surrounded the Mount Radford mansion. Apart from its historic interest, this green space with its mature boundary trees is one of the key open spaces within St. Leonard’s, and a very positive feature in the townscape. It, furthermore, provides an important setting for the four listed villas of St. Leonard’s Place and a vantage point to view the spire of St. Leonard’s Church to the southwest.</p>
	<p>12.10 A group of late 20th century detached houses intrude along the north western edge of Mount Radford Lawn and are a negative feature and demonstrate <u>the damage that may be done by inappropriate development</u>, whilst on the opposite side of Barnardo Road a long terrace of Edwardian houses are a positive townscape feature.</p>

	27.1 Open spaces and trees are of primary importance in terms of the character of this conservation area. The school playing fields such as Mount Radford Lawn and particularly the campus of Exeter School, County Hall and the wooded grounds of the Maynard School and St. Leonard's Primary School make a significant contribution to the character and appearance of the Conservation Area.

The contravention of all those policies and the opinions and wishes of 505 members of the St Leonards Community clearly demonstrate that this application should not be approved and we urge you to recommend is refusal.

Yours sincerely,

Nigel FitzHugh

Chairman,
St Leonards Neighbourhood Association