

***REPRESENTATIONS TO THE PLANNING INSPECTORATE to be made by the
St Leonards Neighbourhood Association..***

***1. Designation of Land at Matford Lane as a Brownfield site capable of
being developed. Specifically by building 21 homes on the site.***

In a Delegated Report by Devon County Council in March 2023 there was a proposal for “Demolition of single storey office buildings, (associated steps and paths) known as Matford Offices. The footprint of the buildings and associated steps and paths to be returned to grass.” This was widely consulted on both internally at DCC (the owners of the land) and externally at ECC and other stakeholder consultees, all 13 bodies agreed that demolition should be allowed for historic, aesthetic and practical reasons, a condition was that the land should be returned to grass.

The Exeter City Council’s Housing & Economic Land Availability Assessment document, as recently as Nov 2024, states:- “Site Description - Site occupied, until relatively recently and for a period of around forty years, by buildings in office use. The planning consent for the offices was on a temporary basis and conditioned to return to grass, so the site is ‘Technically Greenfield.”

For these reasons we believe that the Designation of this land as a Brownfield site in the new draft Local plan is UNSOUND. For Exeter City Council to declare one month that the land is ‘Technically Greenfield’ then, less than one month later, to change its designation to Brownfield shows displays a strange organisational disconnect.

2. ECC’s failure to carry out a review of of all prospective Local Green Space sites in Exeter when drawing up the Local Plan.

It has become good practice among many Local Authorities that, when drawing up a Local Plan, a survey of all green spaces in their area is made in order to understand provision and make sure that there will be a good balance between green spaces for communities and required development. Exeter City Council did not carry out such a survey and hence is not able to make balanced decisions on the allocation of such spaces. The drafting of a good plan requires knowledge of the status quo in order to guide future policy. For this reason we believe that the drafting of the Local Plan by Exeter City Council is UNSOUND.

3. ECC ‘s failure to process to our 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, 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). 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, we are pleased that this representation can be made and we trust and hope that the inspector can recommend our request for inclusion.

THIS REPRESENTATION IS SUPPORTED BY OVER 250 RESIDENTS AND
USERS OF THE GREEN SPACE IN QUESTION. NAMES AND CONTACT
DETAILS CAN BE SUPPLIED.

LGS 'application' information

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