



The City Surveyor,
Exeter City Council
Paris Street
Exeter EX1 1JJ
via email
estates@exeter.gov.uk

24 December 2024

Dear City Council Estates team,

Public open space disposal - Land at Grace Road Field

Exeter Civic Society is writing in response to your recently advertised notice to dispose of land at this site for an Energy Centre. We object for the following reasons:

1. This site is located in the Riverside Valley Park, and the Council's 2012 Local Plan policy CP16 restricts development to only buildings that enhance the use of the valley park. **This disposal is therefore contrary to council's own planning policy** which is established to ensure the valley parks are retained in a natural state for the benefit of the public as places for recreation and to enjoy nature. **The council is not therefore fulfilling its statutory duty to protect the valley park.**
2. The disposal is also contrary to the emerging Exeter Plan Natural Environment chapter in many respects. The four Vision statements all expect the neighbouring hills and Valley Parks to be protected to support the Vision. Policies NE1 and NE2 are also significant, and whilst there is mention of allowing development that supports Net Zero 2030, there are also many expectations that must be considered. Paragraph 10.2 of the Plan states '*The natural environment benefits from a significant, protective legal framework including the Environmental Act 2021, that helps set the context for protecting and enhancing Exeter's existing environmental assets and creating new assets and networks. The Exeter Plan seeks to manage development pressures on our local environment to provide benefits for landscape and wildlife, deliver nature recovery, whilst helping us to combat climate change and provide a high quality environment for people to enjoy.*' **We would expect that before any disposal is finally endorsed that compliance with the Environment Act 2021 is considered.**

3. No development proposals have been published by the City Council or developers for the public use of Grace Road Fields as required by policy S15 of the Water Lane SPD. Without such an analysis it is not possible for the council to determine whether there will be adequate provision for existing and future residents, including the provision of sports pitches.

Policy S09 of the SPD states *'Neighbourhood equipped areas for play (NEAP) and playing pitches can be provided off-site through financial contributions where existing play facilities can be upgraded. Bromham's Farm playing pitches and Clapperbrook Hub are opportunities for new and enhanced facilities.* The suggested Clapperbrook Hub is at the junction of Clapperbrook Lane and the canal, but will not be possible if the suggested land is disposed of.

Policy S15 states: *'Grace Road Fields is a wildlife, nature and energy opportunity site and proposals should strengthen its role as an important site connecting Water Lane, the Riverside Valley Park, Marsh Barton and its station, both for people and nature. Proposals for Grace Road Fields should be developed in collaboration with the Council and other stakeholders including Sport England to ensure a comprehensive strategy for the future use of the site. Development proposals for other sites in Water Lane should explore opportunities to support proposals for Grace Road Fields. Proposals should prioritise uses which:* • Enhance nature and biodiversity, particularly along the Canal and the railway embankment. • Establish the area around Marsh Barton station as a regional destination for recreation and water-related activities. • Improve recreational opportunities, particularly along the Canal and near the station. • Improve access to the Canal, particularly along the Canal and near the station. *Uses that are being considered for Grace Road Fields include BNG habitat bank, woodland creation, recreational area, wildlife hub, canal Basin/marina, energy centre, allotments and solar farm. The Riverside and Ludwell Valley Parks Master plan should be used for ideas and reference'. This SPD was endorsed by Executive in July 2024 so all of its proposals should be given significant weight. The disposal of this land must not be approved until all of the above have been explored, including with the developers of Water Lane and the Harbour Master to determine whether any of the above is essential, and a higher priority than an Energy Centre.*

4. The council has failed to publicly consider the needs of future residents from development at Water Lane and Marsh Barton for green infrastructure, even though it is expected that these homes will be mainly flats with little or no outside space, and well below the minimum expected in the Council's SPDs of 55sq.m. for new houses (homes). Many of the new flats to be built locally will be family homes, perhaps with three bedrooms, and many will be social homes.

5. The council has failed to express any public opinion about this proposal, having considered the disposal of the site in part two of the Executive meeting in July, and then failed to discuss the disposal publicly at the October Executive meeting as previously advised in media responses in September. Whilst the published minutes of the Executive meeting in July acknowledges the site is within the Riverside Valley Park, there was no recognition of Planning Policy CP16. Without the importance of policy CP16 being brought to councillors' attention, we believe they have made a decision without considering the council's planning requirements. It would have helped respondees to the public notice if the council had expressed a view about the disposal, any benefits perceived, and why the council considers the disposal of 1.8 Hectares of valley park land acceptable. The 'further information' published on the council's website is clearly produced by the developer, although that has not been made clear without any author noted.
6. With the recent publication by the government of an increased housing target for the city of 815 homes a year (3,000 extra over the lifetime of the Exeter Plan), it is highly likely that more homes will need to be built at Marsh Barton to achieve this target. These will require more green space for residents. Early drafts of the Exeter Plan suggested up to 5,000 homes at Marsh Barton, and the Liveable Exeter webpages still have this aim. And although an additional call for sites for the Exeter Plan found sufficient sites to achieve a build rate of 642 homes a year, most of these are small sites and not capable of achieving 3,000 extra homes. It seems that Marsh Barton is the only area that could achieve such a yield of homes as there is little or no greenfield land available within the city. **We consider it imperative that this site is not disposed of until the council has considered its statutory responsibility to identify land for the additional 3,000 homes, with adequate green infrastructure land, to achieve support for the additional 7,000 people who could now live in the area.**
7. Exeter Energy is also proposing the construction of a data centre. The disposal of this land will also enable a private enterprise that is unlikely to provide any public benefit to Exeter other than its excess heat.
8. The shape of the land to be disposed of has changed considerably from that considered by the council's Executive in July, resulting in less than half of Grace Road Field now being available for public use. We consider that the land outside of the proposed site to the west and south will be virtually unusable by the public, especially if that is intended to form a tree shield, and to increase biodiversity.

It is our opinion that all of the above matters should be considered and developed by the council before agreeing any 'in principle agreement' for any disposal of the site, and before considering any planning application.

Yours faithfully

K Lewis

Keith Lewis. Chairman