

Chris Cummings
Principal Project Manager
Exeter City Council
Torquay,
TQ1 2JP

8th May 2025

Av Job Ref – A3100

Dear Chris

Town and County Planning Act 1990 (as amended)

RE:25/0197/FUL KING GEORGE V PLAYING FIELDS (EXETER)

Following our recent meetings with you to discuss the design and layout of the site together with concerns/questions raised by various statutory and no-statutory consultees, we have been working with our consultant team to produce a set of revised drawings, documents and additional details. I have set out below a summary table of the elements of the proposal where additional/amended information has been provided, and I discuss each of the amendments and additional details in this letter.

Element	Current position
Drainage	Response provided by Sam Hurdwell of SW Norse – email to Joshua Lewis of DCC FRMT
Designing out crime	Response provided by Chris Jay of SW Norse
RSPB	See relevant section in this letter below.
Urban Design	Drawings have been updated and submitted in response to the comments made by Mark Pearson.

Ecology	Updated ECla report from GE – also see the section in this letter below.
Arboriculture	Response provided by Doug Pratt. Revised AIA and TPP prepared and supplementary response note.
Lighting Assessment – Padel	Response provided by specialist lighting assessor
Sport England	Please see comments in this letter regarding the recent consultation response from Sport England
Aerial View	Updated aerial view provided

Drainage

There are on-going discussions between Joshua Lewis of Devon County Flood Risk Management Team and the drainage consultant at SW Norse, we consider that the information provide is sufficient for DCC to be able to recommend safeguarding conditions for additional information to be provide via reasonably worded conditions

Designing out crime

As part of the original consultation exercise, Kris Calderhead of Devon and Cornwall Police provided comments to Christopher Cummings, we have submitted a document in response from Chris Jay, Lead Designer (SW Norse) the responses from the designer are to each of the specific comments raised by the Designing Out Crime Officer. An updated aerial photograph has also been provided taking into account Mark's comments.

RSPB

The RSPB have provided comments on the application, in response the design team have the following comments to make:

For the avoidance of doubt the numbers of boxes in the RSPB response needs clarification. Do they mean 4 groups per each of the three elevations stated, or 4 groups in total spread across the three elevations stated? 3/4 individual brick boxes are just about possible on each of the elevations stated, but only viable when new upper storey is constructed. North elevation of existing building does lend itself readily to a group of brick boxes. Would suggest a meeting is convened within Stephen Kitt to agree extent of bird boxes and locations and revise drawings possibly as a non-material amendment application or via a reasonably worded condition.

Urban design

A number of matters were raised by Mark Pearson as part of his consultation response which have been considered and amended plans have been submitted to address his concerns.

Ecology

The response from the ecology consultee seeks to impose a condition that the floodlights are turned off by 9pm, this is due to the ecological impact assessment (ECIa) submitted as part of the application stated that this is what is proposed, however, they were incorrectly stating this time as that is the time that the site currently closes (according to the council's information), and not because a curfew of 21:00 is strictly required because of a detrimental impact on bats. The vast majority of the bat active period will be no lighting at all. There would be no light spill beyond 0.5lux in key locations (including potential bat roost features) so bats will still be able to use the key areas.

An amended ECIa has been submitted as part of these amendments.

Arboriculture

The response from the Council's Tree Officer requested that additional justification/information be provided to support the application, Doug Pratt has updated the Arboriculture Impact Assessment together with the Tree Protection Plan and provide direct comments in response to the Tree Officer's comments.

Lighting Assessment – Padel

The initial application omitted to provide details of the lighting impact from the proposed covered Padel courts, this has now been undertaken and submitted with the latest amendments.

Sport England

The consultation response from Sport England is, on the whole, encouraging and the applicants are pleased that they do not object to the proposed development, subject to the three conditions stated at the end of the report.

The comments and concerns of the LTA are noted, however, they are very contradictory. On the one hand, they support the provision of Padel on this site:

As the governing body for padel the LTA welcome the inclusion of covered courts within the proposed development at King George V Playing Fields. Padel is a social sport most effective and enjoyable when played in doubles.

The LTA are confident that padel would work well at this location and especially as part of a wider community sport offer.

However, they go on to state that:

However, the LTA do not advocate the loss of tennis courts to another sport, regardless of current condition and utilisation rates.

We refer to the Exeter Playing Pitch Strategy which supports the above comments. The PPS references this site as a priority for tennis where courts should be protected and enhanced with full resurface and installation of gate access. It also highlights that greater and latent demand exists for people wishing to play tennis in a park environment with an undersupply of park courts such as those at King George V. This leads to a need to retain and improve park tennis courts as one of the main priorities highlighted within the strategy.

The playing pitch strategy was completed in 2022 after many years of evidence gathering it notes that the following facilities are available across the city:

There is a range of provision for tennis in Exeter, including the Community Indoor Tennis Centre (and 4 outdoor courts) at the University of Exeter Sports Club, a number of open access courts on park sites, some flourishing tennis clubs, notably Exwick Tennis Club and Victoria Park Tennis Club and commercial club facilities at the David Lloyd Centre and Exeter Golf and Country Club. There are also a number of courts on secondary school sites, many of which would benefit from floodlighting to increase community usage.

It also notes that the pitch surfacing of a number of these courts is very poor or unplayable, including the site at KGV. However, whilst the wish is that these courts are to be upgraded there is not strategy for how this will be achieved. The courts at KGV, 3 years on have no funding agreed to be resurfaced.

The more recent survey of the local community undertaken by the applicant posed the following question:

What is your preferred racket sport?

- Tennis = 33.2%
- Padel = 44.6%
- Pickleball = 12.4%
- Other = 9.8%

It is clear to see that the most up to date information places Padel higher than tennis, with no existing Padel courts in walking distance of the local community (population of 59,719,724 within a 10 minute walk of the site) yet there is a significant amount of tennis provision though most of the facilities lie empty or unused due to underinvestment and because there is a lack of take up of tennis.

The applicant's desire to invest in the site for the needs of the community should be welcomed, Padel is a new phenomenon that is taking the country by storm and the South West as a whole is behind the curve nationally in its provision. Sport England recognise the benefits of Padel and on balance support the element of the scheme.

The applicant has considered alternative location to provide either the tennis courts or the Padel courts, however, due to tree constraints, the proximity of neighbouring residential properties, impact on existing sport pitches and wildlife restrictions, there is no other reasonable alternative that would allow both sports to be accommodated.

Overall, as the statutory consultee governing sports provision supports the Padel element, even when noting the LTA concerns, the Local Planning Authority should adopt a similar positive and proactive approach to provide substantially enhanced community sporting facilities that the city can be proud of.

The comments regarding the footpath taking away available pitch space is noted, however, the requirements of proposed condition 3 can be achieved by the current scheme with at least 3 metre circulation space available for each pitch in accordance with FA guidelines.

Should you have any queries, please do not hesitate to contact me.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Gavin Spiller', with a stylized flourish at the end.

Gavin Spiller BA (Hons) MA MRTPI
Planning Director