



DEVON ARCHAEOLOGICAL SOCIETY

Local Plans Team
Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN

5th February 2025

Dear Sir or Madam

The Exeter Plan, 2021–2041: Publication Plan (Regulation 19)

We write on behalf of the Devon Archaeological Society, a body of 500 members, both lay and professional, who are committed to the conservation of the county's historic environment. Our Society has been actively engaged in the care of the buried archaeology, ancient monuments and historic buildings of the city for almost a century.

Our comments will naturally concentrate on matters relating to the historic environment and heritage of the city. We note the statement (1.19) that the purpose of the present round of comments is to establish the 'soundness' of the Plan, and will aim to concentrate on this matter. We further note that the 'straightjacket' of the representation form on which responses are requested (/required?) is not susceptible to more discursive comment, no matter how relevant, and we are therefore also attaching to the completed form(s) this response by letter.

Background

In our response to the previous draft (January 2024) we raised a number of objections which still form the basis of our opposition to the Exeter Plan, namely:

While welcoming the core policies on history and heritage we think strongly that the policies are only as good as their implementation and our recent experience has been to observe that implementation of policy in the city has tended to ignore the historic environment.

That the development policies that concentrate on brownfield city centre sites set up an immediate conflict with the historic environment, especially when such an emphasis is placed on matters of density and height.

That Exeter's heritage assets (both designated and undesignated) are vulnerable to harm by development policies and archaeological importance has not been sufficiently allowed for.

The contribution the historic environment makes to other policy areas (open spaces, green infrastructure, recreation, etc.) is under-represented.

Co-operation with adjoining authorities received less attention than it merits, especially in relation to housing allocations.

Chapter 11: History and Heritage

Firstly, we welcome the policies relating to the City's heritage and historic environment (predominantly in Chapter 11 of the Plan document, but also within Chapters 12 and 13). However, we find these admirable policies to be seriously at odds with other elements of the Plan, particularly as they relate to 'brownfield



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development', density, and economy, and we thus wish to object to the soundness of the Plan on the basis that it does not recognise or endeavour to resolve these inconsistencies. We would also note that the 'Liveable Exeter' principles (which stress the need actually to enhance Exeter's heritage: 4.12, 4.15) include repeated references to 'optimal' density on brownfield sites, whereas the rest of the document appears to focus on maximising their density.

We must stress that the emphasis on the allocation of brownfield sites for housing within and in the immediate vicinity of the walled circuit (e.g. at sections 4.5–4.7, S1.4; 6.8, 6.10, H2, etc.) has major implications for the buried archaeological deposits and wider historic environment of the city (most particularly parts or all of the 'North Gate/Mary Arches Street', 'East Gate', 'South Gate' and 'Exe Bridges Retail Park' sites, although by no means confined to these alone). We believe that there is a serious conflict between these policies and the statements now made regarding the value of the archaeological resource in Chapter 11 (e.g. at paras 11.36–11.38).

On this basis, we object to these policies, given their failure to be integrated in any way with the policies relating to the historic environment. It should be clearly understood that, if development of these sites is to be carried out successfully and with due respect for the archaeological resource, Government planning guidance requires that far more consideration will need to be given in advance to their design, layout and massing, particularly in the light of the 'skyline' assessment now belatedly provided. In addition, serious and sustained commitment will be required, both in the form of detailed advanced prospection by means of assessment and evaluation, and by means of full excavation, with attendant cost and time implications and subsequent requirement for adequate publication of the results, as well as other mitigation measures, up to and including retention/preservation *in situ*, of these important city centre sites prior to their development.

We are pleased to see the 'Views, Density and Heights Study' by Allies and Morrison and welcome and commend these studies as significant contributions to the city's planning strategy. Clearly a document received in December 2024 cannot have informed any of the policies in the Plan, and we object to the fact that no attempt has been made to integrate this in any way. One might anticipate from the use of the term 'Evidence Base' that such a document would serve as a foundation to the Plan preparation process, and not as a late bolt-on which can only exist alongside previously formulated policies. Nevertheless, the study will provide essential guidance for assessing future applications relating to these sites and we urge the city council formally to adopt this document as a part of planning policy.

We commend the statements and policies upholding and promoting the historic environment and heritage of Exeter (S1.11, 4.12, 8.9, HH1–HH5) and the statements that the city's history and heritage are crucial to the understanding and promotion of its future (e.g. 11.1, 11.4–11.5, 11.12, 11.19, 11.44, etc.). However, we observe that this and previous similar statements appear not to inform the City Council's current or recent planning decisions, which appear rather to ignore such issues. Specific cases include the Harlequin shopping centre, the Royal Clarence, Longbrook Street, etc. We repeat the comment made in our previous letter (9th January 2024) that professions of good intent are only as good as their implementation, and if these various policies and statements of intent are ignored (as they sometimes seem to have been in recent cases) then the validity of the whole exercise is called into question. In particular, the professed intention to promote the development of brownfield sites in and near the city's historic centre to a greater than usual density of dwellings (e.g. 4.10–4.11) is irresolvably at odds with the protection and preservation of the city's archaeological resource. This greater density will presumably have implications for the heights of buildings



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on these sites, something that has been a continual source of disagreement in previous comments on development proposals in the historic city centre, and likely to impact negatively on the townscape if allowed to go ahead. (This point is given further force in the detailed conclusions of the Allies and Morrison Report – Evidence Base Section 9).

While we note with approval the section on ‘Conserving and enhancing the Exeter City Walls’, with its statements on the overall significance of the city wall, we also note with concern that there are several allusions to repairs and maintenance of the wall as conditional upon obtaining funding (e.g. 11.46; policy HH5), with the implication that this would be external funding and that the maintenance of the wall is, in some way, an ‘optional extra’. This society views the city’s responsibility to maintain and repair the city wall as absolute, not conditional, in a tradition that stretches back to the origin of the defences in the second century A.D. and spans the intervening centuries. Exeter’s city wall is one of the most spectacular and complete examples in the country, and we would observe that not only does its historical and archaeological importance appear to be deplorably undervalued by the City Council, but also that its cultural and tourism potential (and hence of course its potential economic value to the city) is being overlooked. Until the last ten years, the proper maintenance of the city wall has been a responsibility always taken seriously by the City Council, but part of the reason the city wall is currently in such a poor state of repair is attributable to the virtual absence of routine maintenance in more recent years. We therefore consider the absence of any commitment to this responsibility on the part of the City Council, the owner of most of this nationally important monument, to render this section unsound.

Heritage Impact Assessment (HIA)

We object to the content of the lengthy supporting ‘Heritage Impact Assessment’ (HIA) tabled as part of the ‘evidence base’ for the Plan, amounting to some 360 pages, which should have formed a useful appendage, but which is quite unworthy of a city so archaeologically rich as Exeter. This document is quite unsound, as it would appear that the individual archaeological assessments have been written with little or no knowledge of the archaeological work that has been carried out in both the city and its environs over the last forty years. As a supporting document for Strategic Policy HH1 it is entirely inadequate. The archaeological advice, such as it is, appears to be based solely on statutory designations and the extent of the Exeter Area of Archaeological Importance, and not in any way to benefit from the numerous excavations within the city, and their subsequent thorough interpretation, nor the extensive areas outside the historic core, most notably to the east of the city, where extensive excavation over the last twenty years has revealed evidence of intense prehistoric activity. As presented, this document appears to have been compiled by means of an extensive ‘cut and paste’ exercise, rather than exploiting the extensive available historical and archaeological information relating to individual sites and their immediate surroundings. Time and time again, for site after site, the same general formulae are repeated verbatim, with no site-specific information provided.

We believe this major shortcoming derives from the fact that little or no attention has been paid to the extensive, and site-specific, information within the Exeter Historic Environment Record (HER), which has been built up over many years with support from Historic England. This may not be surprising in view of the fact that so far as we are aware that the HER is presently dormant, if not indeed moribund, inaccessible even to council officers, let alone other interested parties and the general public, and has not been updated for a number of years now, despite the commitments entered into by the City Council at the time of its creation. The HER should have formed the foundation of all the advice for the centre of the City within the HIA, and without it the document is virtually useless. For the area outside the historic core, an excellent record is fully



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available in the HER maintained by Devon County Council, to which, similarly, no reference appears to have been made. We refer to the obligations on local planning authorities in the NPPF (para 205 in the latest version of December 2024) and in the Levelling Up and Regeneration Act 2023, whereby they are statutorily required to make available and maintain an HER.

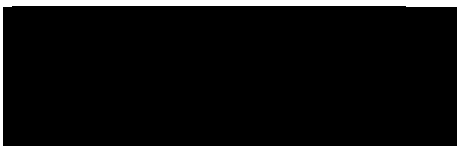
General comments

In terms of the city's most important 'heritage assets', we note the almost complete omission from the Plan of consideration of one of the principal historic features of the city: Exeter Cathedral and Close. Not only is the protection and conservation of these of great archaeological importance, but their relation to the rest of the city, and the impact of development within the city to their protection and appreciation, are barely mentioned in the Plan. Many currently proposed and future developments within the city are capable of having a serious and lasting impact upon the setting and appreciation of the Cathedral and Close. For example, we mention the very ill-considered proposals currently being made for the Acorn Roundabout area of the South Gate.

We note that the text of the Plan has not been carefully proof read and that additions and alterations since the previous draft have not always been followed through by correction of cross references and the like. We noted errors of this sort on p. 25 (where in line 2 'HH2' should now read 'HH4'), and p. 105 (where at 11.47 'HH3' should now read 'HH5'), and there may have been other similar instances we did not note in reading the text. Care will be needed to ensure accurate cross-referencing in the final version.

In the light of these objections, the Devon Archaeological Society formally requests the right to be heard at the Examination Hearings of the Exeter Local Plan, and to be notified of developments in the plan-making process.

Yours faithfully



Dr Stuart Blaylock, FSA, President

Mr John Allan, FSA, Vice-President

Professor Valerie Maxfield, FSA, Vice-President

Ms Frances Griffith, FSA, Vice President

For and on behalf of the Executive Committee, Devon Archaeological Society