



DEVON ARCHAEOLOGICAL SOCIETY

Examination of the Exeter Local Plan: Matters, Issues and Questions Hearing Statement by Devon Archaeological Society, April 2026

These responses should be read alongside Devon Archaeological Society's previous written consultation responses, particularly those dated 9th January 2024 and the 5th February 2025.

Matter 9 – Site Allocations, Issue 2, Strategic Mixed Use Brownfield Allocations – Policies SBA1, SBA2, SBA3, SBA4 and SBA5.

Development policies that concentrate on brownfield city centre sites (principally those within and immediately outside the walled circuit) set up an immediate conflict with the historic environment, especially when such emphasis is placed on density and height. In particular the professed intention to build at a greater-than-usual density of dwellings (e.g. paras 4.10-4.11) is seriously at odds with the protection and preservation of both the city's historic character and its archaeological resource.

Policy SBA2: East Gate

Q3. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

Q4. What effect will the allocation have on archaeology?

The boundaries of the proposed development area lie outside of the city wall, but include large parts of the significant suburban streets of Sidwell Street (south side) and Paris Street. The extent to which buried archaeology will have survived post-war reconstruction is debatable but at the very least deep-dug archaeological features such as wells, pits and cellars will survive, and there is potential for more extensive building plans and other important evidence to survive in places. Traces of the outer earthwork defences (especially ditches) may also survive outside the city wall line on the west edge of this area. Detailed archaeological assessment should clarify the potential for survival.

Policy SBA4 - Exe Bridges Retail Park

Q2. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets?

Potential effects on archaeology are not mentioned in questions on this site, but ought to be because of known activity in this area from past excavations, notably a C16th/17th bell foundry and possibly a medieval tilery, plus prehistoric river channels and post-medieval suburban development.

Policy SBA5 - South Gate (Strategic policy)

Q2. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

Q3. What effect will the allocation have on archaeology?

The proposed site boundary runs against the face of the city wall, and even crosses it in the area of the by-pass; development within a wide margin up to the wall should be resisted. As has been pointed out repeatedly although heavily disrupted by post-war development and road layouts, archaeological deposits have been demonstrated to survive on most of the sites examined in this area in the past and their survival certainly cannot be discounted (as has sometimes been done in previous statements about this site). Detailed archaeological assessment and evaluation will clarify the nature and extent of survival and should be done well enough in advance to offer guidance on development proposals.

This site/group of sites has a particular sensitivity vis-à-vis the potential impact of redevelopment, probably with tall buildings, on the buried archaeology, the historic town plan and townscape, and on the views of the city and cathedral, from both near and far. The implications for the setting of Exeter Cathedral (a major element in Exeter's heritage that is little considered throughout the Plan) are of concern here. The recommendations of the Exeter Skyline Study will also be of particular relevance here.

For information, in expansion of this point, we attach our comments on an earlier, as yet undetermined, proposal for the redevelopment of the South Gate area.

In relation to the City's historic gates, we would remark that there has been no 'strategic' policy included in the draft Plan for the area of the City's North Gate, although it has been demonstrated in a number of previous, excellent, excavations that this is an area where both Roman and mediaeval archaeological deposits survive particularly well. It is an area of considerable importance in the continuing elucidation of Exeter's Roman legionary fortress, as well as of the history of the City Wall. We attach some recent comments we have submitted on proposed redevelopment here to emphasize the importance of this area.