

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm** on **6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title

Dr

First Name

Stuart

Last Name

Blaylock

Job Title (where relevant)

President

Organisation (where relevant)

Devon Archaeological Society

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.
(Continue on a separate sheet if necessary)

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

X

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The Devon Archaeological Society believes 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). This is made more acute by the emphasis on density and height (e.g. at section 6.81, *inter alia*). 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 and policy HH3).

On this basis, we object to the policy of intensive housing development of 'brownfield' sites in and adjoining the historic core of Exeter, and believe it to be unsound given the failure to integrate with the policies relating to the Historic Environment enumerated elsewhere in the plan (notwithstanding the rather vague statement at 6.12 that 'Housing development ... will be supported subject to consideration of all relevant policies in the development plan').

We, the Devon Archaeological Society, have found it impossible to accommodate all of our comments and suggestions on the Plan within the constraints imposed by these forms. As a result we are also attaching our letter of response to the email by which these forms are submitted.

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Due acknowledgement of the significance of the archaeological resource in policies relating to intensive housing developments at sensitive sites in and around the historic core of Exeter. Greater recognition that the blanket definition of 'brownfield' sites includes many sites that are archaeologically sensitive and that the inference that a 'brownfield' site is one on which there are fewer constraints to development is erroneous. Perhaps a specific cross reference to policies HH1 and HH3 somewhere in this section would go some way towards firming up this matter.

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes

☐

No

☒

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The emphasis on housing development of brownfield sites, especially those within and/or adjacent to the walled circuit of Exeter's historic core, and on maximising the density (and, it is thereby implied, the height) of such housing developments could have been lessened and ameliorated by co-operation with adjoining local authorities in the measures proposed to achieve housing requirements.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.

(Continue on a separate sheet if necessary)

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.

(Continue on a separate sheet if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

☐

Yes, We wish to participate in hearing session(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Necessary because of the consistent downplaying of historic environment matters in relation to other policies outlined in the Plan and evident neglect of ancient monuments in general and the city wall in particular. Concern that unsound aspects of the application of policy will continue to impact on the well-being of the city wall.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>