

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)

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 and policy HH5, we have two principal objections. First is that the policy is not sound because it fails to acknowledge that the greater part of the circuit of the city wall is owned by the City Council and therefore the maintenance and repair of the wall is the City's responsibility. We 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, one that arises in the origin of the Roman town defences in the second century A.D. and spans the intervening medieval and later 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 undervalued by the current City Council, but also that its cultural and tourism potential (and hence its potential economic value to the City) is being overlooked. We would add that the masonry wall that is the scheduled ancient monument is one component of a defensive ensemble comprising an earth rampart inside the wall and ditches on the outside. The rampart survives above ground in the vicinity of the Cathedral on the south-east side of the city, but is present as buried archaeology in many places and should always be taken into account wherever sites in close proximity to the city wall are under consideration.

Second is the fact that, whatever the professed content of the policy, contemporary planning practice does not have sufficient regard for the importance of the city wall, and so the statement that 'development proposals that cause harm or restrict public access to the Exeter City Walls will not be permitted.' (policy HH5, para 1) is incorrect. In reality, proposals that do just this are being permitted (examples of the development of private dwellings to the north-east of north gate in 2010, which has restricted access to a section of the wall that was formerly open and free; or the proposed Harlequins development, given consent in 2021, which encroaches close to the wall, and will certainly result in harm to the setting of the monument and damaging impact on its associated earth ramparts/buried archaeology).

We might add that the failure over many years to carry out basic maintenance and removal of vegetation on a regular basis has itself set up situations where harm is caused to the monument and public access is impaired.

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)

ECC (as the inheritor of the past civic authorities who built, repaired and maintained the city wall) to acknowledge its ownership and direct responsibility for maintaining and repairing the city wall.

Implementation of policy to be more aware of the need to prevent harm and maintain public access to the monument in assessing applications.

Basic maintenance and clearance of vegetation to be carried out on a regular basis to pre-empt more serious structural problems arising.

Such steps would endow the policy with consistency and integrity (sc. soundness).

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)

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)

X

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>

