

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

Canon

First Name

Christopher

Last Name

Palmer

Job Title (where relevant)

Canon Treasurer

Organisation (where relevant)

Exeter Cathedral

Address Line 1

1 The Cloisters

Line 2

Exeter

Line 3

Line 4

Post Code

EX1 1EZ

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

☒

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)

[Chapters 6 & 16] Our second concern relates to the impact of tall housing development on the sightlines of the historic core of Exeter. Still today, the cathedral towers rise above the lower buildings around and can be viewed on approach road and the surrounding area. We are concerned that the new policy of encouraging high-density developments on brownfield sites, laudable in the right setting, will bring the construction of tall buildings in the walled area or immediately outside it which will cause irreparable damage the city centre's historic skyline. The developments at East Gate and outside South Gate seem to us to pose a particular risk here. The cathedral has previously made representations on this point. We welcome the *Views, Density and Heights Study*, which has been undertaken recently, but note that this has not issued in a specific policy in this area.

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)

We would urge adoption of the *View, Density and Heights Study*, and taking into account a full Environmental Impact Assessment and modelling of the effect of new buildings on sightlines the city's historic core, including on the cathedral, *before* such buildings are committed to within the plan.

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, I 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)

The cathedral has a significant place in the heart of the city, and its voice is important in crystallising proposals in the two areas we have expressed concern about (culture & heritage; and sightlines).

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>

T: [REDACTED]
E: [REDACTED]

planning.policy@exeter.gov.uk

23rd January 2024

Dear Sir or Madam

Exeter Plan

Thank you for the opportunity to comment on the Exeter Plan draft. This response is made on behalf of the Dean and Chapter of Exeter, and has been prepared with input from members of the Cathedral Chapter and Fabric Advisory Committee, and the Cathedral Archaeologist.

We applaud the high aspiration of the plan in relation to Heritage and Culture. The two areas in which we wish to register a concern do not detract from the many strengths of the plan.

[Chapters 11 & 12] Our first concern is our disappointment that the cathedral features so little in the plan; a small number (seven) of largely peripheral mentions, and featuring well down a list of cultural assets. The cathedral is the city's principal tourist and cultural asset, and very largely the reason the city has the importance that it does today; the cathedral is arguably the finest intact example of late decorated gothic architecture in the country, and a major reason why people visit the city. No specific policies within the plan support or enhance the cathedral's role, or allocate the cathedral specific roles within the cultural and visitor offer of the city. We would wish to work with the city council in defining a more bespoke plan for the cathedral's place in the city plan.

[Chapters 6 & 16] Our second concern relates to the impact of tall housing development on the sightlines of the historic core of Exeter. Still today, the cathedral towers rise above the lower buildings around and can be viewed on approach road and the surrounding area. We are concerned that the new policy of encouraging high-density developments on brownfield sites, laudable in the right setting, will bring the construction of tall buildings in the walled area or immediately outside it which will cause irreparable damage the city centre's historic skyline. The developments at East Gate and outside South Gate seem to us to pose a particular risk here. The cathedral has previously made representations on this point. We welcome the *Views, Density and Heights Study*, which has been undertaken recently, but note that this has not issued in a specific policy in this area. We would urge adoption of this document, and taking into account a full Environmental Impact Assessment and modelling of the effect of new buildings on sightlines the city's historic core, including on the cathedral, before such buildings are committed to within the plan.

We have in earlier conversations and representations raised these concerns before, and are grateful for the ways in which these representations appear to have had some influence on the plan, and would urge far more developed proposals in these areas. Thank you for your attention to these concerns. We would wish to have the opportunity to participate in the hearing sessions.

With best wishes.

