

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)

In failing to observe the NPPF requirement to maintain and make available a Historic Environment Record (HER), and in failing to use the dormant HER in the preparation of the Heritage Impact Assessments for the draft plan, ECC is in breach of its legal responsibilities (NPPF, para. 205, December 2024 edition).

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)

HER to be maintained, updated, made available and used in preparation/revision of Heritage Impact Assessment.

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)

The wording of the policies on the historic environment is unimpeachable, but this is invariably at odds with the 'evidence base' as provided in the Heritage Impact Assessment and Sustainability Appraisal Site proformas. These assessments take no account of any of the recent work on the historic core area of the city, nor on the outer 'greenfield' areas. As a result this is an unsound basis on which to consider the impact of the proposals of the Exeter plan upon the historic environment. This major lacuna undermines the policies themselves by giving incorrect information about the likely archaeological implications on many of the development sites, especially the group of brownfield sites within and/or adjacent to the walled circuit on which so much of the emphasis of the housing policies of the plan is based. As examples we might quote the South Gate (HIA pp. 121-24) and North Gate/Mary Arches (pp. 108-14) sites in the historic core of Exeter, which are, by any judgement, highly sensitive and will contain many, varied and probably highly complex archaeological deposits (as is known from past excavations in their vicinities), yet are classed as 'amber' in the scoring matrix. To take out-of-town examples the various sites in the Digby area, which is known from previous excavations to have extensive survival of prehistoric archaeology (sites 79-82; HIA pp. 182-189, SA pp.249-64: all rated 'green'), or the related sites to the south in Old Rydon Lane and Newcourt Road (sites 83, HIA pp. 189-91; 89-91, pp. 201-08, SA pp. 265-68 and 285-300, rated 'yellow' or 'green') are all likely to have significant archaeological remains. In short there appears to be no acknowledgement or cognizance of all of the work that has taken place in this area in the last 25 years, and which would lead to the reasonable assumption that significant below-ground archaeology is likely to be encountered on these sites.

We believe this major shortcoming is attributable to the fact that little or no attention has been paid to the extensive and site-specific information available within the Exeter Historic Environment Record (HER, for the central area of the historic city) and Devon County HER for the remainder of the area within the city boundary. That these resources have been neglected or ignored, when they have been built up over many years for precisely this purpose, is unfortunate, nay incredible. In failing to maintain and make available the HER (and use it in the preparation of the Heritage Impact Assessments in support of the draft plan), ECC is in breach of its legal responsibilities (NPPF, para. 205, December 2024 edition).

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)

Heritage Impact Assessments to accommodate site-specific information from Exeter and Devon County Historic Environment Records. Site rating system to be critically evaluated in relation to such information and not massaged downwards to minimise impact, as the present treatment appears (to the informed observer) to do.

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)

The Sustainability Appraisal proformas are based on the Heritage Impact Assessments (HIA) to which we have objected for reasons set out above. There is a clear indication that the under-recognition of archaeological potential in sites, the playing down of the possibility of harm to the 'significance of the historic environment/assets' (not least because of the information-free descriptions of the HIA, as referred to above) and their repeated dismissal as 'Negligible' in terms of 'SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets', all combine to diminish and play down the overall significance of the archaeological resource. This is a problem arising from process: assessments built up from hard knowledge of the archaeology will be informed by the process; those made by means of a repetitive cut and paste exercise without reference to existing knowledge will remain void.

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 potential severe impacts of these policies on the archaeology, historic buildings, ancient monuments, historic open spaces, setting, and historic environment of the city in general.

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>

