



DEVON ARCHAEOLOGICAL SOCIETY

Planning Services
Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN

f.a.o. Howard Smith, Principal Project Manager, City Development Team: Case Officer

30th July 2025

Dear Mr Smith

Ref: 25/0781/FUL: Mary Arches Street, Exeter. Demolition of multi-storey car park and construction of a co-living development, etc.

The Devon Archaeological Society is a body of 550 or so members who care about the protection and study of the county's archaeological sites and monuments. Membership includes both professional and amateur archaeologists living and working in the county and beyond. Since its foundation in 1928 the Society has taken a close interest in the archaeology of Exeter, sponsoring its own excavations under the aegis of the Exeter Excavation Committee in the 1930s and publishing the results of many other excavations in the city since then in its journal *Proceedings of the Devon Archaeological Society*.

We were initially concerned to see so little reference to the archaeological implications of this development in the preliminary published material by Darling Associates, although we are pleased now to see the archaeological assessment of the site and the provision for evaluation excavations uploaded to the planning portal (in documents by AC Archaeology dated June 2025). We believe that the archaeological importance and sensitivity of this large site may not have been fully recognised to date. We regard this as one of the most important sites within the historic core of Exeter (the Cathedral Close and its environs always excepted!), and certainly is one of the few such sites likely to become available for excavation at any time in the foreseeable future. It is thus essential that the archaeological deposits here should be fully investigated so that the information about Exeter's history that they can yield will not be lost for ever. The assessment report places the site in the context of the Roman military fortress, but is less detailed when it turns to the later Roman, early and high medieval periods, and the early modern/post-medieval periods. However, deep urban deposits of great importance are known from several adjacent sites, and it is likely that the archaeological deposit on the 'flat' part of this site will be deep and complex, with remains of all periods of Exeter's history. Even within the footprint of the multi-storey car park, archaeology cannot be written off, in view of reports that surviving archaeological features were observed on this site in the 1970s, and it remains highly likely that deeply-dug intrusive features may be present there.

For the remainder of the site, outside of the multi-storey car park, the potential for substantial archaeological survival is very high indeed and will include remains of Roman military structures that are the oldest part of Exeter's heritage, as well as those relating to the Roman, Saxon and Medieval towns. What this means is that (depending on the degree of preservation established by the evaluation excavations and projections therefrom) this site could require open area excavations on a similar scale to those seen at Princesshay in the 2000s. In particular, if there are waterlogged environmental deposits, such as Anglo-Saxon pits, such have been encountered on equivalent city-centre sites nearby), then these would require lengthy (and costly) sampling and analysis. The sum of all this is that an open area excavation of the Mary Arches Street site would be lengthy and complex and will require careful planning. Since the full implications of this may not have been flagged up to date, the developers ought to be made aware of the likely scale and cost of this excavation, with attendant implications on the timing of works. The evaluation excavations that are happening at present ought to give some indication of the degree of preservation, and thereby ought to inform the detailed project planning and timetabling for the main excavation that must follow. This will ensure that due allowance is made for the archaeological remains to be adequately examined and recorded prior to the development and then suitably studied and published.

We note that this site is within the Central Exeter Conservation Area, is adjacent to the Roman city wall (a Scheduled Ancient Monument), and is bordered by several listed buildings, the setting of which will be compromised by the proposed buildings and their associated landscaping. Currently viable pedestrian routes, some of early origin, also stand to be compromised, should the promise of gated access come to pass. We also note the excessive density of occupation proposed for this site (far in excess of what is appropriate). It may not be irrelevant to mention in this context that it is just 100 years since large sections of the built-up area within the walls, including much of Paul Street, were demolished in the name of 'slum clearance', in the process leading to the loss of many fine 16th/17th century buildings. In the dwellings here proposed, we may be looking at the slum tenements of the future.

We defer to others (Exeter Civic Society; Devon Buildings Group, cc'd here) for detailed comments on the proposed design of the buildings, while noting the monolithic nature of the apartment blocks; the tiny size of the rooms they contain; and (despite statements to the contrary) the absence of much acknowledgement of local architectural idiom in the design. Above all is the question of whether another 309 'co-living' apartments are needed in the centre of Exeter. Indeed, it seems that on the high rents that are demanded, even the one block completed to date (The Gorge, in Gladstone Road) is struggling to be fully subscribed. On all of these counts this proposal seems flawed to this Society and we wish to object on the grounds here set out.

Yours sincerely

A handwritten signature in black ink that reads "Stuart Blaylock". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Dr Stuart Blaylock, F.S.A.
Vice-President

For and on behalf of the Executive Committee of the Devon Archaeological Society

cc. (by e-mail) Exeter Civic Society
Devon Buildings Group
Exeter Observer
Historic England, Bristol