



Examination of the Exeter Plan

Matter 8 – Regeneration, Employment and Economic Development

Issue 1, questions 6, 8 and 9

Issue 5, questions 4, 5 and 7

Historic England, Hearing Statement

February 2026

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

1 Introduction

- 1.1. This statement addresses the Inspector's questions with regard to Matter 8 of the Exeter Plan Examination: Matters, Issues and Questions.
- 1.2. This hearing statement should be read alongside Historic England's comments submitted during the Regulation 19 consultation on the Local Plan, along with our [Statement of Common Ground](#) (SoCG) with Exeter City Council, dated September 2025.

2 Matter 8 – Regeneration, Employment and Economic Development

Issue 1 – Regeneration Opportunity Areas – Policy H3

Q6. Is Policy H3 intended to set out development requirements in the same way as site allocation policies?

- 2.1 One of the Regeneration Opportunity Areas relates to the wider area of Exeter's historic North Gate. This is an area of extremely high historic and archaeological significance which includes numerous listed buildings and the site of the former Roman Fortress. While we acknowledge that the delivery of regeneration in this wider area is less certain than on a strategic site allocation, it is nevertheless of some concern that the policy does not respond to the evidence in the Exeter Skyline and View Report and associated Stage 2 Sites report, not does it contain specific protections for heritage in a similar way to the policies for strategic site allocations.
- 2.2 We have therefore agreed with the Council additional wording to be included in Policy H3 and its supporting text. This is recorded in our [SoCG](#) with the Council (p16-19) and in the Council's proposed modifications ([CSD-03](#)) SMM28 and SAMM20, and includes the following:
- "The full range of planning policies in the Exeter Plan will apply to proposals for comprehensive regeneration. In the case of North Gate, heritage will be a critical consideration. In the case of Marsh Barton, flood risk will be a critical consideration."
- 2.3 Nevertheless, should the Inspectors consider that additional wording should be incorporated into Policy H3 to ensure that the plan is sound and responds to the new evidence on Exeter's strategic views, then we would be pleased to work with the Council to agree appropriate policy criteria. Within our response to the Regulation 19 Local Plan for Policy H3, insofar as it applies to North Gate, we suggested the following additional policy criterion:
- "A design that seeks to conserve and enhance important strategic and local views; delivers a finer grain of development, greater permeability and animation of street frontages."

Q8. Are the requirements set out in Policy H3 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 2.4 As set out in our response to the Regulation 19 Local Plan consultation and question 6 above, Historic England considers that the policy criteria need to be strengthened in relation to the historic environment, and to better respond to the Local Plan evidence base.

Q9. What is the justification for the suggested modification to Policy H3? Why is it necessary for soundness?

- 2.5 Please see our response to question 6. We have agreed with the Council proposed modifications to Policy H3 and its supporting text, but this could go further, particularly in response to the Exeter Skyline and Views Report and associated Stage 2 Sites report.

Issue 5 - New Transformational Employment Allocations – Policy EJ6

Q4. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

- 2.6 In Historic England's response to the Regulation 19 Local Plan consultation, we highlighted some of the heritage sensitivities of the St Luke's Health Campus site and surrounding area. In summary, the non-designated heritage assets of St Luke's College / North Cloisters and chapel are located within the site itself. The site is located partly within, and otherwise surrounded by, St Leonards Conservation Area. There are several listed buildings close to the site, including Baring Crescent immediately to the east which enjoys some views of the Cathedral from upper floors. As development at St Luke's campus has potential to impact on the significance of these heritage assets, we consider that both the policy and its supporting text should be strengthened.

Q5. Paragraph 7.32 states that a masterplan/Supplementary Planning Document (SPD) will be prepared by the City Council and the University to guide the proposals for the St Luke's Campus site which will sit alongside the 2010 University of Exeter Streatham Campus Masterplan Framework SPD. Is it appropriate to defer decisions over the use and scale of future development to a masterplan/SPD, which would not be subject to examination in the same way as a development plan document?

- 2.7 In our response to the Regulation 19 consultation and subsequently within our [SoCG](#) with the Council (p30-31) we raised concerns about the lack of a robust policy framework for St Luke's Campus and suggested the following additional text to Policy EJ6 to address this:

"St Luke's Campus

Proposals for St Luke's Campus will focus on the eastern portion of the site and will be informed by archaeological and heritage assessment and be guided by a masterplan/Supplementary Planning Document. Proposals should be of high quality, should consider and respond to the environmental and heritage assets on and around the site and important strategic and local views, and should be appropriate within the context of surrounding residential development."

- 2.8 While this remains an outstanding issue, we have made some progress by agreeing proposed modifications with the Council to the supporting text of Policy EJ6. This is reflected in our [SoCG](#) (p30-31) and the Council's modifications ([CSD-03](#)) SAMM60.

Q7. What is the justification for the suggested modification to Policy EJ6? Why is it necessary for soundness?

- 2.9 We do not have any comments on the Council's suggested modifications to Policy EJ6 but, as outlined above, we consider that additional modifications are necessary to ensure that the plan is consistent with national policy, justified by proportionate evidence, and therefore sound.