



Examination of the Exeter Plan

Matter 9 – Site Allocations

Historic England, Hearing Statement

April 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 9 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 9 – Site Allocations

Issue 2 – Strategic Mixed Use Brownfield Allocations – Policies SBA1, SBA2, SBA3, SBA4 and SBA5

Q4. How have the Exeter Skyline and Exeter Density studies been considered in formulating Policies SBA1 to SBA5?

- 2.1 In Historic England's response to the Regulation 19 consultation on the Local Plan, we highlighted that the height and density of development at **Water Lane SBA1** are important factors in determining whether development is an appropriate response to important strategic and local views. These matters are considered in detail in the Exeter Skyline Study which forms part of the evidence base for the Local Plan.
- 2.2 Water Lane does not, however, feature in the second part of the study looking at heights and densities, as the Liveable Water Lane Supplementary Planning Document (SPD) was already at an advanced stage at the time of the study. It is therefore our understanding that the development capacities on the site allocation are informed by the SPD.
- 2.3 However, we do consider that the detailed design work at Water Lane should be informed by an understanding of strategic and local views (in accordance with the SPD) including evidence contained in the Exeter Skyline Study.
- 2.4 Through our Statement of Common Ground with Exeter City Council we have therefore agreed the following wording change:
- 'J. Conservation and enhancement of the historic environment:
i. A layout and built form that seeks to conserve and enhance important strategic and local views and is informed by the Exeter Views, Density and Heights Study: Exeter Skyline Study, archaeological and heritage assessment, evaluation and mitigation.' (proposed modification SMM90)
- 2.5 For **SBA2 East Gate**, we again consider that the Exeter Skyline Study provides evidence on important views that should inform both the Local Plan and subsequent planning applications.
- 2.6 It is our understanding that the second part of the study, the Strategic Allocations: Views, Heights and Capacity study, has informed the site capacity for the allocation.
- 2.7 However, this work does not amount to a masterplan and it should be noted that we would not necessarily support all of the example heights and massings that it contains. Historic England therefore supports the modified policy text, giving higher status to the Skyline report when drawing up future planning applications, while specific heights and densities should be informed by more detailed masterplanning and community engagement.

'H. Conservation and enhancement of the historic environment:

i. A layout and built form that seeks to conserve and enhance important strategic and local views and is informed by the ~~Exeter Views, Density and Heights Study~~; Exeter Skyline Study and archaeological and heritage assessment, evaluation and mitigation.'

- 2.8 For **SBA3 Red Cow**, for similar reasons to those set out above we have agreed changes to part H(i) of the policy. We have also agreed a slight adjustment to the wording of part H(ii) of the policy to better reflect the heritage considerations on the site.

'H. Conservation and enhancement of the historic environment:

i. A layout and built form that seeks to conserve and enhance important strategic and local views and is informed by the ~~Exeter Views, Density and Heights Study~~; Exeter Skyline Study, and archaeological and heritage assessment, evaluation and mitigation.'

ii. A built form that enhances the character and appearance of St David's Conservation Area, conserves and enhances listed buildings and their settings and retains sight lines of locally listed St David's station.'

- 2.9 For **SBA4 Exe Bridges**, for similar reasons to those set out above we have agreed changes to part I(i) of the policy as follows:

'I. Conservation and enhancement of the historic environment:

i. A layout and built form that seeks to conserve and enhance important strategic and local views and is informed by the ~~Exeter Views, Density and Heights Study~~; Exeter Skyline Study, and archaeological and heritage assessment, evaluation and mitigation.'

- 2.10 For **SBA5 South Gate**, while it has been possible to agree a change similar to the above with Exeter City Council, Historic England continues to firmly believe that great place-shaping at South Gate would require an approach that considers, and repairs, the grain and permeability of this site, currently an island blighted by highway infrastructure. This recommendation is echoed in the Strategic Allocations: Views, Heights and Capacity study, which forms part of the evidence base for the Local Plan.

- 2.11 The text below represents that which we have agreed with the Council, plus the additional text we are requesting, which is highlighted:

'H. Conservation and enhancement of the historic environment:

i. A layout and built form that seeks to conserve and enhance important strategic and local views, delivers a fine grain and permeability, and is

informed by the ~~Exeter Views, Density and Heights Study~~; Exeter Skyline Study, and archaeological and heritage assessment, evaluation and mitigation;'

Policy SBA1 – Water Lane

Q7. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets?

- 2.12 Water Lane has been identified as an area for regeneration for many years. Historic England therefore recognises that the character of the area will change. We believe that this change can be positive, provided proposals are well designed and represent heritage-led regeneration. High density housing and mixed-use development can be best achieved at this site on the basis of compact, street-based forms of development including appropriate use of mid-rise.
- 2.13 We consider that Policy SBA1, with modifications outlined above, represents a positive strategy for heritage. The associated Water Lane SPD will help to ensure that heritage assets within the site form an anchor for characterful place-making and development. The SPD will also help to ensure that appropriate consideration is given to local and strategic views, and informed by the Exeter Skyline Study. These longer views engage some of Exeter's most significant heritage assets – including the grade I listed Cathedral and grade II* Colleton Crescent – which are both prominent townscape features to the north.

Q12. What is the justification for the suggested modifications to the Policy SBA1 and its supporting text? Why are they necessary for soundness?

- 2.14 Insofar as the proposed policy changes to SBA1 relate to strategic and local views, we support these in line with our response to question 4 above.

Policy SBA2 – East Gate

Q1. According to Policy SBA2 the proposed housing would be at a density of about 101 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?

- 2.15 Historic England's understands that the development capacity proposed for SBA2 East Gate is informed by the Strategic Allocations: Views, Heights and Capacity study, and could be achieved by heights and massings broadly similar to those shown in the report.
- 2.16 While Historic England would not necessarily support all of the example heights/massings shown in the report (this would depend on detailed impact assessments at planning application stage), we are nevertheless broadly content with the study as a strategic approach to estimating site capacity.

Q3. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

- 2.17 Historic England considers that the strategic allocation at East Gate overall presents an important opportunity for regeneration. This will involve an evolution in the character of the area to the east of Sidwell Street, which should be informed by, and respond to, an understanding of the context. For example, building heights, massing, grain and materials should be carefully managed to deliver growth while reinforcing positive characteristics of the area.
- 2.18 In relation to views of, and from, nearby heritage assets and landmarks, the Exeter Skyline Study will assist in guiding developers towards forms of development that conserve and enhance the settings of heritage assets.

Q4. What effect will the allocation have on archaeology?

- 2.19 Exeter's long and rich history of occupation means that it contains many archaeologically sensitive areas. The northern part of the proposed strategic allocation at East Gate is located within Exeter's Area of Archaeological Importance, while the scheduled Underground Passages commence just beyond its western edge.
- 2.20 Historic England therefore welcomes the fact that Policy SBA2 requires development to be informed by archaeological and heritage assessment, evaluation and mitigation.
- 2.21 Through our Statement of Common Ground with Exeter City Council we have agreed further adjustments to heritage policies in the plan to help ensure an appropriate level of protection.

Q9. What is the justification for the suggested modifications to the Policy SBA2 and its supporting text?

- 2.21 Insofar as the proposed policy changes to SBA2 relate to strategic and local views, we support these in line with our response to question 4 above.

Policy SBA3 – Red Cow

Q1. According to Policy SBA3 the proposed housing would be at a density of about 116 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?

- 2.23 Historic England acknowledges that priority should be given to higher density development in sustainable locations including close to public transport interchanges. We understand that the development capacity proposed for SBA3 Red Cow is informed by the Strategic Allocations: Views, Heights and Capacity study, and could be achieved by heights and massings broadly similar to those shown in the report.

- 2.24 While Historic England would not necessarily support all of these example heights/massings (for example, the idea of a building up to 10 storeys adjacent to St David's conservation area would need to be subject to robust testing), we are nevertheless broadly content with the study as a strategic approach to estimating site capacity.

Q2. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets such as St David's station?

- 2.25 Development at Red Cow will involve change to the character of the site and an evolution of the character of the wider area. It will be important that this is informed by, and responds to, an understanding of the context, including historic buildings such as St David's railway station and the St David's conservation area.
- 2.26 Subject to good design, heritage assets can form the centrepiece of heritage-led regeneration (for example the redevelopment of the area around Kings Cross and St Pancras railway stations in London). We therefore emphasise the importance of the proposed changes to Policy SBA3 that we have agreed with Exeter City Council (see our response to question 4) to ensure appropriate protections are in place.

Q10. What is the justification for the suggested modifications to the Policy SBA3 and its supporting text? Why are they necessary for soundness?

- 2.27 Insofar as the proposed policy changes to SBA3 relate to strategic and local views, and the conservation and enhancement of heritage assets, we support these in line with our response to question 4 above.

Policy SBA4 – Exe Bridges Retail Park

Q1. According to Policy SBA4 the proposed housing would be at a density of about 112 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?

- 2.28 Historic England acknowledges that priority should be given to higher density development in sustainable locations including close to public transport interchanges. We understand that the development capacity proposed for SBA4 Exe Bridges Retail Park is informed by the Strategic Allocations: Views, Heights and Capacity study, and could be achieved by heights and massings broadly similar to those shown in the report.
- 2.29 Historic England would not necessarily support all of these example heights/massings. For example, we are concerned that monolithic blocks and buildings of up to 8 storeys may impact adversely on the relationship between the historic city and its landscape setting (e.g. in views from Bartholomew terrace). However, we consider there to be reasonable flexibility within the range of heights shown across the site for these impacts to be managed better through detailed design.

Q2. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets?

- 2.30 Development at Exe Bridges Retail Park will involve change to the character of the site and an evolution of the character of the wider area. It will be important that this is informed by, and responds to, an understanding of the context, including the former railway station, nearby conservation area, and strategic views of the Cathedral. Overall development should seek to enhance the area and to avoid or minimise harmful impacts on heritage assets.

Q6. What is the justification for the suggested modifications to the Policy SBA4 and its supporting text? Why are they necessary for soundness?

- 2.31 Insofar as the proposed policy changes to SBA4 relate to strategic and local views, we support these in line with our response to question 4 above.

Policy SBA5 – South Gate

Q1. According to Policy SBA5 the proposed housing would be at a density of about 54 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?

- 2.32 South Gate represents an important opportunity for regeneration and enhancement, which should be informed by its historic significance and sensitivity.
- 2.33 We understand that the development capacity proposed for SBA5 South Gate is informed by the Strategic Allocations: Views, Heights and Capacity study, and could be achieved by heights and massings broadly similar to those shown in the report.
- 2.34 We welcome the fact that testing of potential heights and massings has resulted in a reduction of the capacity of this sensitive strategic site. Nevertheless, we remain of the view that, as at North Gate, there is much to be gained by reinstating a finer grain of development at South Gate, with greater permeability, including streets and spaces of a more human scale that respond to the historic context. As set out in the National Model Design Code, high densities can be achieved in a range of ways, which do not need to be slab blocks unrelated to their surrounding context.

Q2. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

- 2.35 There is potential for development at South Gate to have adverse impacts on highly significant views of the Cathedral and city skyline.
- 2.36 Conversely, if sensitively designed we believe there is a great opportunity for heritage-led regeneration that reintroduces fine grained street-based forms of development consistent with adjacent historic areas. We therefore reiterate

the modest additional wording that we are requesting in Policy SBA5, as set out in our response to question 4 and below:

'H. Conservation and enhancement of the historic environment:

i. A layout and built form that seeks to conserve and enhance important strategic and local views, delivers a fine grain and permeability, and is informed by the ~~Exeter Views, Density and Heights Study: Exeter Skyline Study,~~ and archaeological and heritage assessment, evaluation and mitigation;'

Q3. What effect will the allocation have on archaeology?

- 2.37 South Gate is located in Exeter's Area of Archaeological Importance. The City Walls, run along its northern boundary, including scheduled sections to the north and south. The Historic Environment Record also identifies a possible Roman cemetery in the South Gate area. There is therefore considerable potential for development to impact on archaeology.
- 2.38 We therefore welcome the fact that Policy SBA5 requires development to be informed by archaeological and heritage assessment, evaluation and mitigation. We strongly suggest that research is carried out as early as possible to inform the proposals. This will help to ensure that appropriate mitigation can be designed in and that unexpected discoveries do not impact on delivery at a late stage.

Q6. What is the justification for the suggested modifications to the Policy SBA5 and its supporting text? Why are they necessary for soundness?

- 2.39 Insofar as the proposed policy changes to SBA5 relate to strategic and local views, we support the proposed modifications. However, as set out above we believe that the policy should also do more to promote appropriate forms of development.