



Historic England

Examination of the Exeter Plan

Matter 12 – Historic Environment, Culture and Tourism

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 12 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 12 – Historic Environment, Culture and Tourism

Issue 1 – History and Heritage – Policies HH1, HH2, HH3, HH4 and HH5

Q1. Are the Plan’s heritage policies consistent with the approach to conserving heritage assets in the Framework, having particular regard to the tests in paragraphs 206-209?

2.1 Through our Statement of Common Ground, Historic England has agreed a considerable number of adjustments to policies HH1, HH2, HH3, HH4 and HH5 as well as their supporting text. These changes are proposed to ensure that the plan is:

- accurate and sound,
- consistent with legislation and national policy,
- justified on the basis of proportionate evidence, including the Council’s Heritage Impact Assessment of sites, and the Exeter Skyline Study, and
- represents a positive strategy for the historic environment, as required by the NPPF.

Q2. Are policies HH1, HH2, HH3, HH4 and HH5 positively prepared, justified, effective and consistent with national planning policy?

2.2 As written in Regulation 19 consultation version of the Local Plan, we do not consider that these policies would meet the tests of soundness, including being consistent with national policy.

2.3 However, we have agreed proposed modifications with the Council through our Statement of Common Ground (SoCG) which we hope will resolve these issues.

Q3. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

2.4 In answering this question, to best assist the Inspectors, we have compared the proposed modifications agreed in our Statement of Common Ground with those contained in the Schedule of Suggested Modifications ([CSD-03](#)). Below we have listed a number of modifications that we believe should be taken forward Main Modifications to secure soundness. Others may represent corrections but would nevertheless be beneficial.

SAMM83	While the proposed changes to paragraph 11.3 and 11.4 reflect those agreed in our SoCG, as these are lengthy wording changes required to ensure an appropriate response to the evidence base, we consider they should be Main Modifications rather than Additional Modifications.
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SMM70	We are pleased to note that the proposed modifications to Policy HH1 Conserving Heritage Assets are presented as main modifications. We asked for additional policy text to be included to deal with non-designated heritage assets. While we have provisionally agreed this, we note that the approach to non-designated heritage assets differs to that contained in the NPPF. Should the Inspectors consider that this presents a soundness issue we would be pleased to discuss alternative wording.
SMM71	We are pleased to note that agreed changes to Policy HH2: Conservation Areas are presented as Main Modifications.
SMM72 SMM73	We are pleased to note that agreed changes to Policy HH3: Archaeology are presented as Main Modifications.
SMM75 SAMM87	We are pleased to note that agreed changes to Policy HH4: Heritage Assets and Climate Change are presented as Main Modifications. As the supporting text also contains important corrections and clarifications, we suggest that these are also considered for Main Modifications.
SMM76	We welcome the fact that adjustments to the supporting text for HH5: Conserving and enhancing Exeter City Walls are presented as a Main Modification. This is important to clarify the implications of the scheduled status of much of the City Walls, and their separate protections under the Exeter City Council Act 1987. Should the Inspectors consider that an adjustment to the policy itself is also necessary for soundness we would be pleased to discuss possible wording changes.