

Exeter Plan

Statement of Common Ground

Exeter City Council and Historic England

September 2025

Exeter City Council
Civic Centre
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Appendix A: Composite version of Policy HH1: Conserving and enhancing heritage assets

Appendix B: Composite version of Policy HH4: Heritage assets and climate change (amended to historic buildings and climate change)

Appendix C: Composite version of Policy HH5: Conserving and enhancing the Exeter City Walls

1.0 Introduction

- 1.1. Exeter City Council (the City Council) have been preparing the Exeter Plan since late 2020. The plan has progressed through four public consultations, culminating in the Regulation 19 publication in December 2024.
- 1.2. Following the end of the publication process in February 2025 representations have been compiled and attention has turned to addressing the issues raised in the representations.
- 1.3. Historic England provided a series of representations or comments to the Regulation 19 Plan. These are considered through this Statement of Common Ground.
- 1.4. This Statement of Common Ground demonstrates that the City Council and Historic England have cooperated on strategic matters and that the plan is positively prepared and effective – two of the tests of soundness for plan preparation as identified by paragraph of the National Planning Policy Framework¹. The document assists in presenting evidence that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. It is also part of the evidence required to demonstrate compliance with the Duty to Cooperate. There has been joint working between Exeter City Council and Historic England on an ongoing basis as the Exeter Plan has progressed.
- 1.5. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance² and meets the requirements of the Planning and Compulsory Purchase Act 2004³ and the Localism Act 2011⁴.

Summary

- 1.6. The Historic England response provides a summary position which is set out below.

‘Overall, subject to a number of modifications that we have requested in this response, we consider that the Exeter Plan would represent a positive strategy Exeter’s rich historic environment. We would be pleased to work with the Council to resolve outstanding

¹ The Exeter Plan is being prepared under the December 2023 version of the NPPF. Available here:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Available at: <https://www.gov.uk/guidance/plan-making>

³ Available at: <https://www.legislation.gov.uk/ukpga/2004/5/section/13>

⁴ Available at: <https://www.legislation.gov.uk/ukpga/2011/20/section/110>

heritage issues through a Statement of Common Ground and/or attendance at the Local Plan Examination if necessary’.

Subsequently the representation states:

‘Notwithstanding these comments, we believe that the general policies and site allocation policies in the Plan could, with some adjustments, represent a foundation for positive place-shaping in Exeter. We are therefore requesting a series of changes to policies in the Plan to ensure an appropriate response to the evidence base for heritage. Our detailed comments on plan policies and supporting text are provided below as a schedule, which may also form the basis of a subsequent Statement of Common Ground’.

- 1.7. More detail is provided and addressed through this Statement of Common Ground.
- 1.8. It should be noted that the Historic England representations and suggested modifications were discussed at meetings between the City Council and Historic England on 28 March and 10 September 2025.

2.0 Strategic matters: Spatial strategy

Broad summary of chapter content

- 2.1 The spatial chapter of the plan sets the tone for the plan as a whole and in doing so sets out the main principles for guiding the pattern and form of development in the city.
- 2.2 The spatial strategy chapter includes two policies:
- S1: Spatial strategy; and
 - S2: Liveable Exeter Principles.
- 2.3 Policy S1 includes the new spatial strategy for Exeter. The spatial strategy guides the pattern and characteristics of development in the city and the proposed development sites included in the Exeter Plan. A key strand of the new spatial strategy is to steer the majority of development to brownfield sites in order to protect the city's landscape and retain Exeter's environmental and heritage quality.
- 2.4 Policy S2 includes the Liveable Exeter principles. These set out the requirements for the standard of development that the City Council will expect for all large-scale brownfield developments. Liveable Exeter is a growth and place-making initiative governed by seven principles which have been drawn from Exeter's Vision 2040. In adopting the Liveable Exeter principles, we aim to strengthen and reinvigorate existing communities and repurpose and transform other parts of the city through high quality development.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 2.5 Historic England provided representations to both policy S1: Spatial strategy and S2: Liveable Exeter Principles at Regulation 19 stage. The representation to policy S1 was supportive whilst the representation to policy S2 suggested one modification.
- 2.6 The detailed representations related to housing are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Spatial strategy	S1: Spatial strategy	Sound. In relation to the historic environment, we welcome adjustments that have been made to the Spatial Strategy subsequent to consultation on the Full Draft Exeter Plan. The new supporting evidence (Views, Density and Heights Study and Heritage Impact Assessment) also assists with evidencing that the strategic focus on brownfield sites is likely to be achievable without undue harm to the historic environment, subject to changes we have requested to the Plan.	Support welcomed.	N/A	No modification required.
Liveable Exeter Principles and the need for specific energy efficiency standards for historic buildings	S2: Liveable Exeter Principles	Partly unsound. We are pleased to note at paragraph 4.12, recognition of the need to respect and enhance the city's heritage. We also welcome the adjustment to Principle 2 to	The City Council recognises that historic buildings have specific characteristics which may mean that they require a more nuanced approach to ensuring their energy efficiency. However, it is	Noted – proposed changes to Policy HH4 are welcomed	No modification required.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		refer to the 'highest appropriate densities'. Principle 4 states that development will 'ensure buildings... adopt a fabric-first approach and apply high performance standards such as Passivhaus'. However, when converting or adapting buildings of traditional construction (which are generally those built before 1919 and therefore a significant portion of Exeter's housing stock) these approaches may not be appropriate. For further information see Historic England's advice on improving energy efficiency. This part of Policy S2 needs to be qualified to ensure that it meets the NPPF soundness tests of being justified, effective and consistent with national policy. We suggest that Principle 4	not considered necessary to include this level of detail in this strategic, overarching policy because more detail is provided in policy HH4: Historic buildings and climate change (formerly HH4 Heritage assets and climate change). The plan needs to be considered as a whole.		

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		is amended as follows: "Ensure buildings are energy efficient, adopt a fabric-first approach and apply high performance standards such as Passivhaus (<u>or appropriate standards for historic buildings under Policy HH4</u>) and whole-life carbon assessment."			

3.0 Strategic matters: Climate change

Broad summary of chapter content

- 3.1 We are facing huge environmental challenges caused by human interventions which are increasing carbon dioxide and other greenhouse gas emissions. In recognition of this, the City Council has declared a climate emergency and pledged to work towards creating a net zero carbon city by 2030. The Exeter Plan includes policies and proposals that contribute to meeting this challenging ambition and to making the most of the opportunities of a net zero carbon city, whilst adapting to the unavoidable impacts of climate change.
- 3.2 The climate change chapter includes nine policies which will support the move to a net zero city:
- CC1: Net zero Exeter;
 - CC2: Renewable and low carbon energy;
 - CC3: Local energy networks;
 - CC4: Ground-mounted photovoltaic arrays;
 - CC5: Future development standards;
 - CC6: Embodied carbon;
 - CC7: Development that is adaptive and resilient to climate change;
 - CC8: Flood risk; and
 - CC9: Water quantity and quality.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 3.3 Historic England provided representations to both policy CC3: Local energy networks and CC4: Ground-mounted photovoltaic arrays. These representations suggested that the two policies were either sound or partly unsound suggesting modifications to both.
- 3.4 The detailed representations related to housing are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Local energy networks and the impacts on archaeology	CC3: Local energy networks	Unsound – clarification requested. Historic England has previously raised the issue that the Heat network evidence seems to relate mainly to technical feasibility. We highlighted that combined heat and power networks will often include below ground infrastructure that may impact on archaeology. We therefore welcome the inclusion within Policy CC3 of a new allowance for developers to demonstrate at detailed design stage whether a scheme is feasible and viable. Bearing in mind the prevalence of highly significant archaeology in areas of Exeter including the City Centre and South Gate, we also queried whether archaeological potential had been	The City Council recognises the potential impact of local energy networks on archaeology and that the presence of archaeology will need to be taken into consideration when delivering such networks. On this basis, it is suggested that an additional paragraph of supporting text after existing paragraph 5.17 is added to state: 'A Local Development Order has been in place since 2019 which grants permitted development rights for local energy networks and associated infrastructure on or under land within large parts of the Exeter administrative area. The potential impacts on archaeology will need to be considered when establishing the feasibility of a heat network.'	We acknowledge the ECC comment, which clarifies the Council's position in relation to heat networks. While we welcome the intent of the statement that potential impacts on archaeology will need to be considered when establishing the feasibility of a heat network, we note that the extent to which this can be enforced by the planning system would be limited to those situations where the LDO is not in force. The LDO includes an exclusion relating to scheduled monuments but not for non-designated archaeology. Bearing in mind the presence of an Area of Archaeological Importance in Exeter, in any future revisions to the LDO we would wish to ensure that provisions are	Include an additional paragraph of supporting text after paragraph 5.17 as follows: 'A Local Development Order has been in place since 2019 which grants permitted development rights for local energy networks and associated infrastructure on or under land within large parts of the Exeter administrative area. The potential impacts on archaeology will need to be considered when establishing the feasibility of a heat network. Additionally, the City Council has successfully designed and implemented an archaeological monitoring requirement in conjunction Devon County Council Highways licencing for infrastructure projects'.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		considered as part of the evidence for the proposed locations. We are not aware of any existing or new evidence on this matter. To ensure that the policy is effective, we therefore request additional wording in the policy or supporting text to highlight the importance of considering archaeology when planning heat networks. Suggested modification: Insert into policy or otherwise supporting text: <u>"Potential impacts on archaeology will need to be considered when establishing the feasibility of a heat network."</u>	Additionally, ECC have successfully designed and implemented an archaeological monitoring requirement in conjunction DCC Highways licencing for infrastructure projects'.	made to secure appropriate protection for any non-designated archaeology of national significance.	
Ground mounted PV and potential archaeological impact	CC4: Ground-mounted photovoltaic arrays	Partly unsound As ground mounted PV arrays may also have direct physical impacts on below ground archaeology we request a slight adjustment to this policy to ensure it is	The City Council recognises the potential impact of ground mounted PV infrastructure on archaeology and so the suggested mitigation is considered appropriate.	Agreed	Amend text in policy CC4 as follows: e. Protect <u>heritage assets and their settings</u> of heritage assets;

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		consistent with national policy. Suggested modification to policy: e. Protect <u>heritage assets and their settings</u> of heritage assets;			

4.0 Strategic matters: Homes

Broad summary of chapter content

- 4.1 Housing is a significant issue nationally and for Exeter. The Exeter Plan will meet the city's housing requirement within the administrative boundary of Exeter City. It will also help to address the housing needs of those who require affordable housing, families with children, older people, students, people with disabilities, Gypsies and Travellers, people who rent their homes and people wishing to commission or build their own homes.
- 4.2 The homes chapter includes sixteen policies which will help to address housing needs in the city:
- H1: Housing requirement;
 - H2: Housing allocations and windfalls;
 - H3: Regeneration opportunity areas;
 - H4: Affordable housing;
 - H5: Build to rent;
 - H6: Co-living housing;
 - H7: Custom and self-build housing;
 - H8: Homes for older people;
 - H9: Supported housing;
 - H10: Purpose built student accommodation;
 - H11: Gypsy and traveller accommodation;
 - H12: Residential conversions and houses in multiple occupation;
 - H13: Loss of residential accommodation;
 - H14: Accessible homes;
 - H15: Housing density and size mix; and
 - H16: Residential amenity and healthy homes.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

4.3 Historic England provided representations to policy H2: Housing allocations and windfalls, H3: Regeneration areas and H15: Housing density and size mix together with some of the supporting text. These representations ranged from being general comments to suggestions that the policies are partly unsound or unsound.

4.4 The detailed representations related to housing are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Housing allocations and heritage impact.	H2: Housing allocations and windfalls: Strategic mixed use brownfield sites	Comment: Please note that our comments on strategic site allocations for housing are provided against the site specific policies in Chapter 16.	Comments noted. Representations considered as part of site allocations chapter.	N/A	No modification suggested here. Addressed in relation to the site allocations in chapter 16.
Housing allocations and heritage impact.	H2: Housing allocations and windfalls: Other site allocations	Comment: We note the assessments and recommendations for these sites within the Council's HIA. While we have no in principle objections to the proposed non-strategic site allocations, in order to secure the appropriate	Comments noted. Representations considered in response to other parts of the plan.	N/A	No modification suggested here. Addressed in relation to other parts of the plan.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		development of these sites it will be important that the Plan contains a robust policy framework for the conservation and enhancement of heritage assets and associated matters such as achieving appropriate densities and the re-use and retrofit of historic buildings. This framework should respond to the issues and potential mitigation measures identified in the HIA. Please therefore see our comments and requested changes to development management policies including CC3, H15, HH1, HH2, HH3 and HH4.			
Housing allocations and heritage impact.	Site allocations ref 163 and 100	Comment: As well as being covered by Policy H2 and the general development management policies, we	Comments noted. Representations considered in response to policy H3: Regeneration opportunity areas.	Noted	No modification suggested here. Addressed in relation to policy H3: Regeneration opportunity areas.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		consider that Mary Arches Multi-Storey and Surface Car Park (ref 163) should be incorporated into a significantly expanded and improved Policy H3: Regeneration opportunity areas – please see our detailed comments on the North Gate area which forms part of this policy. We also recommend that Fever and Boutique, 12 Mary Arches Street (ref 100) is covered by Policy H3 bearing in mind the close proximity and related heritage and design considerations.			
Insufficient policy detail regarding constraints associated with the regeneration opportunity areas	H3: Regeneration opportunity areas: North Gate	Unsound: Regeneration Opportunity Areas are proposed for North Gate and Marsh Barton, both of which were formerly proposed as strategic brownfield allocations in the Full Draft Plan. North Gate is an area of	The City Council recognises the heritage importance of the wider North Gate area and the proposed allocations close to it. To address this matter, it is suggested that additional text is added to policy H3 and the supporting text.	Agreed	Include additional text within Policy H3: 'Comprehensive regeneration development proposals for residential and a wider mix of uses...' Criteria unchanged. Then: 'Opportunities for

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		extremely high historic and archaeological significance, which includes numerous listed buildings and the site of the former Roman Fortress. While we recognise that the delivery of this Opportunity Area policy is less secure than delivery of a strategic site allocation, we are nevertheless concerned that this policy represents a significant step back in protections for heritage (and other matters) in contrast to the Full Draft Plan. The policy also fails to respond to the new evidence for North Gate contained in the Views, Density and Heights Study. We therefore request that this policy is reviewed and expanded. In its current form we consider that this policy fails the tests of soundness as it is neither justified nor consistent with national policy. Subject to the changes we are	'Policy H3 text: 'Comprehensive regeneration development proposals for residential and a wider mix of uses...' Criteria unchanged. Then: 'Opportunities for comprehensive regeneration may occur anywhere within the urban boundary. However, specific potential is identified in the Marsh Barton and North Gate Regeneration Opportunity Areas. 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.'		comprehensive regeneration may occur anywhere within the urban boundary. However, specific potential is identified in the Marsh Barton and North Gate Regeneration Opportunity Areas. 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. Amend paragraph 6.13 to read: '6.13 In accordance with the spatial strategy's focus on brownfield development at optimal densities, the City Council will support the comprehensive regeneration of brownfield

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		requesting this soundness issue could be resolved. The Opportunity Area policy should seek to ensure that any development proposals come forward as a holistic and integrated plan for heritage-led regeneration at North Gate, rather than in a piecemeal fashion. It may therefore be appropriate for North Gate to be subject to Policy S2: Liveable Exeter Principles. As a minimum, proposals should consider and integrate with the proposed site allocation for the Mary Arches Multi-Storey and Surface Car Park (ref 163), which should be explicitly covered by Policy H3 as well as H2. We also recommend that Fever and Boutique, 12 Mary Arches Street (ref 100) is bought under Policy H3 bearing in mind the close proximity and related	'6.13 In accordance with the spatial strategy's focus on brownfield development at optimal densities, the City Council will support the comprehensive regeneration of brownfield land as set out in Policy H3. This includes proposals for comprehensive regeneration redevelopment within the regeneration opportunity areas at North Gate and the northern part of Marsh Barton, two sites which were originally included in the Liveable Exeter initiative, although opportunities for regeneration may occur anywhere within the urban boundary. It should be noted that the regeneration opportunity areas at North Gate and Marsh Barton do not have the same status as allocations. For North Gate, the following text will be added:		land as set out in Policy H3. This includes proposals for comprehensive regeneration redevelopment within the regeneration opportunity areas at North Gate and the northern part of Marsh Barton, two sites which were originally included in the Liveable Exeter initiative, although opportunities for regeneration may occur anywhere within the urban boundary. It should be noted that the regeneration opportunity areas at North Gate and Marsh Barton do not have the same status as allocations. For North Gate, the following text will be added: New paragraph: '6.14 In the case of North

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		heritage and design considerations. Responding to the Council's HIA (site ref 42) and policies in Chapter 16 of the NPPF, the policy should promote the conservation of designated and non-designated heritage assets and their settings. The requirement from the Full Draft Plan that applications are supported by site-specific heritage and archaeological assessment, evaluation and mitigation should be reinstated and expanded to refer to the Cathedral. We also request that the requirement for contributions towards the repair, maintenance and enhancement of the City Walls is reinstated. In this regard, the proposed policy wording would parallel that provided for strategic site allocation	'6.14 In the case of North Gate, heritage will be a critical consideration for comprehensive regeneration proposals given the exceptional historic significance and sensitivity of assets in the North Gate area. These include the Central Conservation Area, the City Walls, views of the cathedral, listed buildings, other designated and non-designated heritage assets, archaeology including the designated Area of Archaeological Importance, as well as any important local and strategic views. Development proposals will also need to consider the relationship with the allocations at Mary Arches Multi-Storey and Surface Car Park and Fever and Boutique, 12 Mary Arches Street'. In parallel, it is suggested		Gate, heritage will be a critical consideration for comprehensive regeneration proposals given the exceptional historic significance and sensitivity of assets in the North Gate area. These include the Central Conservation Area, the City Walls, views of the cathedral, listed buildings, other designated and non-designated heritage assets, archaeology including the designated Area of Archaeological Importance, as well as any important local and strategic views. Development proposals will also need to consider the relationship with the allocations at Mary Arches Multi-Storey and Surface Car Park and Fever and Boutique, 12 Mary Arches Street'.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		Policy SBA5 - South Gate.	that additional text is added to the introductory sentence of policy S2: Liveable Exeter principles to identify that the policy applies to the regeneration opportunity areas: The delivery of high-quality large scale residential and commercial development at the strategic, mixed use brownfield developments allocations and the regeneration opportunity areas of North Gate and Marsh Barton and elsewhere in the case of comprehensive regeneration, will be supported in accordance with the requirements of the Liveable Exeter Principles '.	Agreed	Amend text in Policy S2: Liveable Exeter Principles as follows: 'The delivery of high-quality large scale residential and commercial development at the strategic, mixed use brownfield developments allocations and the regeneration opportunity areas of North Gate and Marsh Barton and elsewhere in the case of comprehensive regeneration, will be supported in accordance with the requirements of the Liveable Exeter Principles '.
		To ensure an appropriate design response having regard to the Exeter Views, Density and Heights Study and our previous response to the Full Draft Plan, we	Addressed through additions within suggested new paragraph 6.14.	Agreed	No modifications required – addressed through new paragraph 6.14.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		request a policy criterion as follows: <u>"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."</u> Finally, supporting text should be used to clearly flag to prospective developers the exceptional historic significance and sensitivity of assets in the North Gate area. We suggest that this should include references to the close proximity of the Cathedral and City Walls, the presence of numerous listed and locally listed buildings within and around the site, and archaeology associated with the Roman town and	Addressed through additions within suggested new paragraph 6.14.	Agreed	No modifications required – addressed through new paragraph 6.14.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		fortress. The site is within Exeter's Area of Archaeological Importance and also in the Central Conservation Area.			
Insufficient policy detail regarding constraints associated with the regeneration opportunity areas	H3: Regeneration opportunity areas: Marsh Barton	Unsound: Marsh Barton is not in itself an area rich in heritage and the Council's generic policies for heritage (including archaeology) could therefore be adequate to ensure appropriate consideration, subject to adjustments that we are requesting to those policies. However, Marsh Barton is a very large area located between the historic city centre and the western hills that form part of the landscape setting of Exeter. The height and massing of	The City Council recognises the heritage importance of the regeneration opportunity areas and the potential impact of strategic-scale development at Marsh Barton (and North Gate). Heritage is, not however, considered to be one of the key issues for Marsh Barton and so no amendments are suggested on this specific basis. However for completeness, an additional paragraph is suggested to explain the issues associated with Marsh Barton as follows:	Subject to changes agreed elsewhere in the plan, including Policy HH1 and supporting text to Policy NE1, we consider this is likely to be acceptable.	No further modifications required beyond those suggested elsewhere.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		any new development at Marsh Barton therefore has the potential to impact adversely on views into, or out of, the historic city. The Exeter Skyline and Views Report goes some way to describing these relationships (see for example view P01 Colleton Crescent) and the policy should flag this as a consideration for future development.	'6.15 In the case of Marsh Barton, flood risk will be a critical consideration for comprehensive regeneration proposals given the location of the area largely within flood zone 3. Development proposals will also need to consider the relationship with the strategic brownfield mixed use allocation at Water Lane.' '6.16 The full range of policies within the Exeter Plan will be applied to the regeneration opportunity areas and elsewhere in the context of comprehensive regeneration proposals. Pre-application discussions will be particularly important'.		

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
The need for greater reference to heritage assets in the context of increased housing density	H15: Housing density and size mix	Unsound: Historic England supports the aspiration of Exeter City Council to optimise housing densities while respecting its heritage. We therefore welcome the reference in the supporting text to this policy to both the city's heritage and to the Views, Density and Heights study, in which the Stage 1 report provides rich evidence about the city skyline and the significance of key views. We consider that Policy H15 should respond to this evidence as well as to evidence in the HIA (e.g. site refs 72 and 75), to ensure that the Plan contains a robust policy framework that is justified and consistent with national policy. This issue could be resolved by amending part b of the policy as follows:	The City Council recognises heritage as an important contextual consideration with regard to housing density. To address this matter, it is suggested that additional text is added to criterion b: 'b. Local context, including the natural, built and historic environment including settings and views'. It is not considered necessary to include additional supporting text to reference the Exeter Skyline Study as this is already included elsewhere.	Agreed	Amend text in H15 as follows: 'b. Local context, including the natural, built and historic environment including settings and views'.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		"b. Local context, <u>including important strategic and local views according to their contribution to the significance of heritage assets, landscape/townscape value and visual amenity.</u> "			

5 Strategic matters: Economy and jobs

Broad summary of chapter content

- 5.1 Exeter is at the heart of a large functional economic market area which reflects a significant travel to work area. The Exeter Plan needs to support the economy and green growth by identifying the employment space and infrastructure we need. This will help to increase prosperity and wellbeing.
- 5.2 The economy and jobs chapter includes six policies which will help to address the economic and employment needs of the city:
- EJ1: Economic growth;
 - EJ2: Retention of employment land;
 - EJ3: New forms of employment provision;
 - EJ4: Access to jobs and skills;
 - EJ5: Provision of local services in employment areas; and
 - EJ6: New transformational employment allocations.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 5.3 Historic England provided representations to policy EJ6: New transformational employment allocations together with some of the supporting text. These representations suggested that the content is unsound.
- 5.4 The detailed representations related to economy and jobs are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
St Luke's University campus and heritage assets	New transformational employment allocations and paragraph 7.32.	St Luke's Health Campus is located partly within and otherwise surrounded by St Leonards Conservation Area. There are also several listed buildings close to the site, while the non-designated heritage assets of St Luke's College / North Cloisters and chapel are located within the site itself. This is therefore a sensitive site from a historic environment perspective. We acknowledge that there is scope for some redevelopment of the eastern part of the site, employing a layout and design that is more sympathetic to these assets, giving consideration to the urban grain, building heights and styles etc. We therefore welcome the commitment in supporting text at 7.32 to preparing a masterplan /Supplementary Planning Document for the site. However, it remains important that the Plan itself	The City Council recognises the heritage assets on the St Luke's site and in the local area. Support welcomed for the masterplan/SPD included in paragraph 7.32.	N/A	No modification required.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		contains a robust policy framework to ensure that it is effective and consistent with national policy.			
St Luke's University campus and heritage assets	St Luke's university campus. Paragraph 7.30 and 7.31	Unsound: Paragraph 7.31 states that proposals will need to be informed by the Exeter Views, Density and Heights Study. Consistent with our comments elsewhere in this response, we believe that care is needed in applying the findings of Stage 2. At St Luke's Campus we are concerned about the illustrated massings and we do not consider that there is sufficient evidence that a building of up to 8 storeys would be appropriate in this location (for example how would this impact the set piece of the College/North Cloister and Chapel in views from around Heavitree Road?). We are also concerned about the level of harm shown to the visual connection between	The City Council recognises the heritage assets on the St Luke's site and in the local area. To address this matter, it is suggested that paragraph 7.31 is revised as follows: '7.31 Proposals at St Luke's will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate regard for the environmental and heritage assets on the site and in the surrounding area. Proposals will also need to be informed by the Exeter Views, Density and Heights Study.' '7.31. There are heritage	Agreed insofar as this represents an improvement to the supporting text. See comment below regarding Policy EJ6.	Amend paragraph 7.31 and add an additional paragraph as follows: '7.31 Proposals at St Luke's will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate regard for the environmental and heritage assets on the site and in the surrounding area. Proposals will also need to be informed by the Exeter Views, Density and Heights Study.' '7.31. There are heritage assets within and around St Luke's Campus, including conservation areas

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		the Cathedral and Baring Crescent, with a narrow corridor illustrated that would partially conserve views from the centre of the crescent only. As the aspirational figure of 44,000 sqm. referred to in 7.30 appears to have been generated by the Stage 2 report, this should also be reviewed as there is not yet sufficient evidence that this capacity could be accommodated sensitively. Amend supporting text as follows: <u>"7.31 There are heritage assets within and around St Luke's Campus, including conservation areas covering much of the surrounding residential area. Proposals at St Luke's will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate</u>	assets within and around St Luke's Campus, including conservation areas covering much of the surrounding residential area, and the Grade II listed properties on Baring Crescent adjoining the site's eastern boundary. Development at the St Luke's campus should be of a high quality and consider and respond to the environmental and heritage assets on and around the site including important strategic and local views. Development should be appropriate within the context of surrounding residential development. 7.32 The focus for significant development at St Luke's Campus should be on the eastern side of the site, particularly respecting the defining features of		covering much of the surrounding residential area, and the Grade II listed properties on Baring Crescent adjoining the site's eastern boundary. Development at the St Luke's campus should be of a high quality and consider and respond to the environmental and heritage assets on and around the site including important strategic and local views. Development should be appropriate within the context of surrounding residential development. New paragraph 7.32 The focus for significant development at St Luke's Campus should be on the eastern side of the site, particularly respecting the defining features of the quad and North

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		regard for the environmental and heritage assets on the site and in the surrounding area. Proposals will also need to be informed by the Exeter Skyline and Views Report Views, Density and Heights Study. "	the quad and North Cloister building. Development will be informed by archaeological and heritage assessment and be guided by a masterplan /Supplementary Planning Document. Proposals will also need to be informed by the Exeter Skyline Study'.		Cloister building. Development will be informed by archaeological and heritage assessment and be guided by a masterplan /Supplementary Planning Document. Proposals will also need to be informed by the Exeter Skyline Study'.
St Luke's University campus and heritage assets	EJ6: New transformational employment allocations	Unsound: To ensure a robust policy framework consistent with other strategic sites, and respond appropriately to the evidence base, we consider that additional provisions should be incorporated into the policy itself. Insert section into EJ6: <u>"St Luke's Campus Proposals for St Luke's Campus will focus on the eastern portion of the site</u>	The City Council recognises the heritage assets on the St Luke's site and in the local area and suggests making modifications to the supporting text at paragraph 7.31 to reflect the Historic England representations. It is not considered necessary to add this level of detail into the policy itself because this would change the strategic nature of EJ6. More	We welcome the additional supporting text, but as it contains some requirements / positive policy statements for the site that are not found elsewhere in the plan, we remain of the view that key criteria should preferably be incorporated into policy. This would be consistent with	Detailed discussions have not fully resolved this issue and any further consideration may be conducted through the Exeter Plan examination.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>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."</u>	detail is coming forward through a separate masterplan/SPD document for St Luke's campus. The City Council has sought to address this comment through paragraphs 7.31 and 7.32 above.	paragraph 16(d) of the NPPF which states that 'Plans should... (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'.	

6 Strategic matters: Retail and the future of our centres

Broad summary of chapter content

- 6.1 The function of the city, local and district centres is changing. Retail is likely to be just one part of their future; a greater variety of uses need to be included in the centres to widen their attractiveness and appeal. Great care will need to be taken to protect the city centre from competition from out of centre retail to ensure its ongoing health.
- 6.2 The retail and future of our centres policy includes two policies which will help to address the future challenges facing our centres:
- RFC1: The future of our centres; and
 - RFC2: Development in, and affecting, within our centres.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 6.3 Historic England provided supportive representations to both retail policies; policy RFC1: The future of our centres and policy RFC2: Development in, and affecting, our centres. Both the representations suggest that the policies are sound without suggesting amendments.
- 6.4 The detailed representations related to retail and the future of our centres are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Retail and the future of our centres	RFC1: The future of our centres	Sound: Historic England supports new Policy RFC1 which seeks to protect, enhance and diversity Exeter's centres and promotes enhancement of heritage assets.	Support welcomed.	N/A	No modification required.
Retail and the future of our centres	RFC2: Development in, and affecting, our centres	Sound: We support the requirement within RFC2 that development should 'c. Conserve and enhance the cultural, historic and natural environments of the centres'.	Support welcomed.	N/A	No modification required

7 Strategic matters: Sustainable transport and communications

Broad summary of chapter content

- 7.1 The way we travel will be vital to the success of Exeter. It will be central to achieving net zero carbon, growing prosperity, healthy lifestyles and making improvements to our natural and historic environments. In future, travel will not just be about whether we walk or drive, digital communications will also be vital. The Exeter Plan will help to ensure that the city is resilient to changes in travel, supporting innovative development in the right places, providing real options and promoting fresh approaches to transport.
- 7.2 The sustainable transport and communications chapter of the Exeter Plan includes nine policies which will help to inform evolving transport and communications in the city:
- STC1: Sustainable movement;
 - STC2: The transport hierarchy;
 - STC3: Supporting active travel;
 - STC4: Supporting public transport;
 - STC5: Supporting more sustainable forms of car use;
 - STC6: Travel plans;
 - STC7: Safeguarding transport infrastructure;
 - STC8: Motorway service area; and
 - STC9: Digital communications.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 7.3 Historic England provided supportive representations to three of the transportation policies; policy STC1: Sustainable movement, policy STC2: The transport hierarchy and policy STC3: Supporting active travel. All three representations suggest that the policies are sound without suggesting amendments.
- 7.4 The detailed representations related to sustainable transport and communications are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Function of the canal	STC1: Sustainable movement	Sound: We support the principle of 'i. Maintaining the transport function of the Exeter Ship Canal', which is part of the city's cultural heritage.	Support welcomed.	N/A	No modification required.
Highways and heritage impact	STC2: The transport hierarchy	Sound: We support the policy provision that 'Highway enhancements will only be supported when they do not cause unacceptable harm to the local natural, built or historic environments'	Support welcomed.	N/A	No modification required.
Active travel and heritage impact	STC3: Supporting active travel	Sound: We support a number of the provisions within Policy STC3 including the principle of addressing severance caused by the road network (which also impacts the experience of heritage assets such as the	Support welcomed.	N/A	No modification required.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		Old Exe Bridge), and of considering potential to reflect and reinstate historic street patterns in the design and provision of active travel routes.			

8 Strategic matters: Natural environment

Broad summary of chapter content

- 8.1 Exeter has a high quality natural environment, with Valley Parks and city parks, water bodies including the River Exe and the Exeter Ship Canal and many public rights of way. The hills surrounding the city give Exeter a distinctive landscape setting, whilst the city contains a rich variety of wildlife habitats. The Exeter Plan will be a key tool to accommodating appropriate development to meet the city's needs whilst protecting key natural environmental assets.
- 8.2 The natural environment chapter of the Exeter Plan includes seven policies which will help to accommodate development in a way which protects and enhances the natural environment:
- NE1: Landscape setting areas;
 - NE2: Valley Parks;
 - NE3: Biodiversity;
 - NE4: Green infrastructure;
 - NE5: Green circle;
 - NE6: Urban greening factor; and
 - NE7: Urban tree canopy cover.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 8.3 Historic England provided supportive representations to two of the natural environment policies; policy NE1: Landscape setting areas and policy NE7: Urban tree canopy cover. Both representations suggest that the policies are sound.
- 8.4 The detailed representations related to the natural environment are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Link between landscape and views in the Views, Density and Heights Study	NE1: Landscape setting areas	Sound – cross reference requested: Historic England is generally supportive of Policy NE1 although it would be preferable if the criteria at paragraph 10.9 were elevated to policy. We acknowledge that these are the 'distinctive characteristics, special features and qualities' referred to in the policy itself and Landscape Assessment and this is therefore unlikely to be a soundness issue. As the Exeter Skyline and Views Report contains a number of views of or from the landscape setting, we consider that the supporting text of Chapter 10 should refer to this important evidence. Add the following sentence to paragraph 10.5:	Support welcomed. The City Council recognises the relationship between views and the landscape setting areas and therefore suggests some revised text within paragraph 10.5: 'The open land also performs a variety of other roles, including maintaining identity, providing a green rural backdrop for key heritage assets (the Exeter Skyline Study identifies some views of particular importance), enabling informal recreation and providing tranquil areas.'	We are grateful for the additional proposed wording at 10.5 which highlights the relevance of the new evidence base to Policy NE1.	Include additional text in paragraph 10.5 to read: 'The open land also performs a variety of other roles, including maintaining identity, providing a green rural backdrop for key heritage assets (the Exeter Skyline Study identifies some views of particular importance), enabling informal recreation and providing tranquil areas.'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>"In addition to the Landscape Sensitivity Assessment, the Exeter Skyline and Views Report identifies some views of particular importance (see Chapter 11).</u>			
The potential impact of urban green factor measures on heritage assets	NE7: Urban tree canopy cover	Sound: We welcome the improved flexibility of Policy NE7 and the accompanying supporting text at paragraph 10.41 which highlights that there may be situations where trees would impact on heritage assets. This would be a particular consideration for sites close to the City Walls, Underground Tunnels and areas of highly significant archaeology.	Support welcomed.	N/A	No modification required.

9 Strategic matters: History and heritage

Broad summary of chapter content

- 9.1 Exeter's rich historic environment makes the city unique and continues to shape the city's culture and identity today. New development can raise challenges for our historic environment but the Exeter Plan provides an opportunity to conserve and enhance Exeter's heritage assets whilst exploring cultural links and celebrating the contribution of heritage to the character of the city.
- 9.2 The history and heritage chapter of the Exeter Plan includes five policies which will help to accommodate development in a way which protects and enhances the historic environment:
- HH1: Conserving and enhancing heritage assets;
 - HH2: Conservation areas;
 - HH3: Archaeology;
 - HH4: Heritage assets and climate change; and
 - HH5: Conserving and enhancing Exeter City Walls.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 9.3 Historic England provided representations to all five heritage-related policies, suggesting four were unsound.
- 9.4 The detailed representations related to history and heritage are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Heritage impact assessment	Paragraph 11.2	Comment: Paragraph 11.2 refers to the HIA that informs the Regulation 19 Local Plan. We welcome this new piece of evidence but we do not consider that the response to it in Local Plan policies is currently adequate. As the non- strategic site allocations in the Plan are not accompanied by individual criteria-based policies, it will be important that the policies in this chapter are strengthened to respond to issues and recommendations in the HIA. This will help to ensure that the Plan is justified, effective and consistent with national policy. See requested changes to Policies HH1, HH2, HH3 and HH4 below.	The City Council recognises the comments made. Greater consideration is given to these points in relation to the subsequent, more detailed representations included below.	Noted	No modification required.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Role of the two stages of the Views, Density and Heights Study	Paragraph 11.3	While we welcome the preparation of the Views, Density and Heights Study, in the introduction to this response we have outlined the difference between the two reports and the need for clarity around their role, status and limitations. We have suggested amendments to address these issues. We suggest the following clarifications to address these issues, drawing on the purpose and limitations set out in the reports themselves: "11.3 In addition to the HIA, a Views, Density and Heights Study has been prepared involving two stages of assessment. This The Stage 1 Skyline and Views Report identifies important views that need to be protected or enhanced, including	The City Council recognises the comments made and suggests amendments to paragraph 11.3. This reflects a change in name to two documents as follows: Views, Density and Heights Study: Stage 1 Skyline and views report – Becomes 'Exeter skyline study: Identifying views and assessment methodology'. Views, Density and Heights Study: Stage 2 sites report – Becomes 'Exeter Plan strategic allocations: Views, heights and capacity – applied methodology report'. "11.3 In addition to the HIA, a Views, Density and Heights Study has been prepared involving two stages of assessment. This The Exeter Skyline	Agreed	Amend paragraph 11.3 and include additional paragraphs to read: '11.3 In addition to the HIA, a Views, Density and Heights Study has been prepared involving two stages of assessment. This The Exeter Skyline Study identifies key views, including views of and from heritage assets across the city and considers the potential development impact of the larger mixed-use brownfield allocations on these views and assets. This work relates to the capacity assessments for key allocations in the Plan, is referenced in the relevant allocation policies and should also be used to inform development proposals across the city, particularly major development proposals.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>views of and from some of Exeter's most prominent heritage assets. It is not a comprehensive study of all views, but will be an important resource for developers when drawing up potential schemes and assessing impacts. in the context of development key views of heritage assets across the city and Historic England was a key stakeholder on Stage 1, and a wider group of stakeholders contributed to the study through a workshop.</u> <u>The Stage 2 Sites Report contains an initial consideration of considers the potential development impact of the larger mixed use brownfield allocations on these views and assets. It is not a substitute for detailed HIA or Townscape and Visual</u>	Study identifies key views, including views of and from heritage assets across the city and considers the potential development impact of the larger mixed use brownfield allocations on these views and assets. This work relates to the capacity assessments for key allocations in the Plan, is referenced in the relevant allocation policies and should also be used to inform development proposals across the city, particularly major development proposals. Historic England have been a partner in producing this work. Exeter's most prominent heritage assets which are the priority for preservation and enhancement. It does not include all views but will be an important resource to inform development proposals and the assessment of		Historic England have been a partner in producing this work. Exeter's most prominent heritage assets which are the priority for preservation and enhancement. It does not include all views but will be an important resource to inform development proposals and the assessment of their potential impact. Historic England was a key stakeholder on the Exeter Skyline Study and a wider group of stakeholders also contributed to the study. 11.4 The Exeter Plan strategic allocations: Views, heights and capacity – applied methodology report has informed the capacity requirements for a series of the strategic allocations in the Exeter Plan in the context of the

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>Impact Assessment (TVIA) at application stage.</u> This work relates to the capacity assessments for key allocations in the Plan, and contains recommendations for height constraints and other development parameters that will be informative to prospective developers. is referenced in the relevant allocation policies and should also be used to inform development proposals across the city, particularly major development proposals. However, it is important to note that the <u>example layouts shown for each site are not proposals and do not represent the only way development could come forward at optimal density across the sites.</u> The layouts shown have <u>not been tested against all townscape, heritage,</u>	their potential impact. Historic England was a key stakeholder on the Exeter Skyline Study and a wider group of stakeholders also contributed to the study. New paragraph 11.4 The Exeter Plan strategic allocations: Views, heights and capacity – applied methodology report has informed the capacity requirements for a series of the strategic allocations in the Exeter Plan in the context of the views included in the Exeter Skyline Study. It considers example scenarios of how development could come forward. In doing so, the Exeter Plan strategic allocations: Views, heights and capacity – applied methodology' work is designed to demonstrate the results of a possible application of the		views included in the Exeter Skyline Study. It considers example scenarios of how development could come forward. In doing so, the Exeter Plan strategic allocations: Views, heights and capacity – applied methodology' work is designed to demonstrate the results of a possible application of the methodology and data gathering of the Exeter Skyline Study. The heights and density of any development proposal would be subject to all the provisions within the Exeter Plan including the preservation and enhancement of designated and non-designated heritage assets and townscape considerations. Detailed HIA or Townscape and Visual Impact Assessment (TVIA) will

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>archaeology or other planning constraints and considerations which would be subject to detailed design and assessment to inform masterplanning and future planning applications. Much additional work will be needed to secure high quality place shaping on strategic sites.</u> Historic England have been a partner in producing this work.	methodology and data gathering of the Exeter Skyline Study. The heights and density of any development proposal would be subject to all the provisions within the Exeter Plan including the preservation and enhancement of designated and non-designated heritage assets townscape considerations. Detailed HIA and/or Townscape Assessment (TVIA) will be required at masterplan or application stage depending on the scale and location of development. New paragraph 11.5 In order to strengthen the ongoing evidence-base and policy for the historic environment, the City Council will publish a new Historic Buildings, Sites and Monuments Record		be required at masterplan or application stage depending on the scale and location of development. 11.5 In order to strengthen the ongoing evidence-base and policy for the historic environment, the City Council will publish a new Historic Buildings, Sites and Monuments Record System (HBSMR) in 2025 together with starting an audit of the key Conservation Area Appraisals and Management Plans. This will start in 2025 with Southernhay and the Friars and then the Central area'.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
			System (HBSMR) in 2025 together with starting an audit of the key Conservation Area Appraisals and Management Plans. This will start in 2025 with Southernhay and the Friars and then the Central area'.		

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Correction regarding heritage legislation	Paragraph 11.7	Unsound - correction needed: A minor correction is required to paragraph 11.7 regarding heritage legislation and including some provisions in the Levelling Up and Regeneration Act which, at time of writing, are not yet in force. Designated heritage assets are protected by law under <u>legislation including the Planning (Listed Building & Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, provisions introduced by the Levelling Up and Regeneration Act (LURA) 2023 (when in force) and by Government policy in the NPPF.</u>	The City Council recognises the need to ensure the text appropriately legislation and therefore suggests a modification to supporting text at the end of paragraph 11.7 as follows: '...Registered Parks and g-Gardens are designated heritage assets. Designated heritage assets are protected by law under <u>legislation including the Planning (Listed Building & Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, provisions introduced by the Levelling Up and Regeneration Act (LURA) 2023 (when those are in force) and by Government policy in the NPPF.</u>	Agreed.	Amend paragraph 11.7 to read: '...Registered Parks and g-Gardens are designated heritage assets. Designated heritage assets are protected by law under <u>legislation including the Planning (Listed Building & Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, provisions introduced by the Levelling Up and Regeneration Act (LURA) 2023 (when those are in force) and by Government policy in the NPPF.</u>

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Greater strength of policy to manage development impacts on heritage assets	HH1: Conserving and enhancing heritage	Unsound: While we welcome Policy HH1, a number of changes are needed to ensure that it is consistent with national policy, in particular NPPF paragraphs 207 and 216, and responds to the evidence base. Firstly, the requirement for applicants to submit a Heritage Statement should be included in policy HH1. This both responds to NPPF para 207 which states that 'local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting'. It also reflects the expectation (which we support) contained in supporting text to HH1 that Heritage Statements should go beyond this by	The City Council recognises the need to include the requirement for a Heritage Statement to be submitted with relevant applications. On this basis, a minor amendment is suggested to paragraph 11.20 as follows: 11.20 'All planning applications affecting heritage assets or their settings must include a Heritage Statement / Heritage Impact Assessment proportionately describing the significance... Additional text is also suggested within policy HH1. A composite version of policy HH1: Conserving heritage assets is included in Appendix A.	Agreed	Include additional text in paragraph 11.20 to read: 11.20 'All planning applications affecting heritage assets or their settings must include a Heritage Statement / Heritage Impact Assessment proportionately describing the significance... Additional revisions to policy HH1 as suggested in Appendix A.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		also 'assessing the impacts of proposed development'. Insert into Policy HH1 the requirement for a Heritage Statement. This could form the first part of the final paragraph: <u>"All planning applications affecting heritage assets must include a Heritage Statement describing the significance of the heritage assets, including any contribution made by their setting, and assessing the impacts of the proposed development upon it. The level of detail should be proportionate to the asset's importance and the assessment should be used to inform and explain the design concept. Development proposals that would result in harm..."</u>			
Greater strength of policy to manage	HH1: Conserving and enhancing	Secondly, at present policy HH1 contains an	The City Council recognises the need to	Agreed	Amend policy HH1 as per Appendix A.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
development impacts on heritage assets	heritage	approach to non-designated heritage that only deals with 'substantial harm'. This is inconsistent with NPPF paragraph 216. It also fails to respond adequately to the Council's HIA which identifies many incidences where development of a site allocation has potential to impact on non-designated heritage assets. Plans should contain a positive strategy for conservation of heritage assets and we would hope that in a majority of cases harm would be less than substantial (although note that the NPPF does not make this distinction for non-designated heritage assets, other than in conservation areas). Insert text into Policy	protect non-designated heritage assets where appropriate. A composite version of policy HH1: Conserving heritage assets is included in Appendix A.		

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		HH1 to explain how the Council will deal with cases resulting in harm to non-designated heritage assets, where this does not amount to substantial harm or total loss.			
Greater strength of policy to manage development impacts on heritage assets	HH1: Conserving and enhancing heritage	HH1 should also respond to evidence contained in both the Skyline and Views Report, and the HIA, in relation to the need to conserve and enhance important views. Insert new paragraph into HH1: <u>"Proposals should seek to conserve and enhance important views according to their contribution to heritage significance and townscape value. When assessing the impacts of their schemes on important views, applicants should consult the Exeter Skyline and</u>	The City Council recognises the need to include reference to the Exeter Skyline Study. On this basis, additional text is suggested for inclusion in policy HH1. A composite version of policy HH1: Conserving heritage assets is included in Appendix A.	Agreed	Include additional text within Policy HH1: Conserving and enhancing heritage assets, as follows: 'Development proposals should seek to conserve and enhance important views according to their contribution to heritage significance and townscape value. Development proposals should be informed by the Exeter Skyline Study where appropriate'. As set out in Appendix A.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>Views Report.</u> "			
Greater strength of policy to manage development impacts on heritage assets	HH1: Conserving and enhancing heritage	HH1 does not currently address Heritage at Risk, as referred to in NPPF paragraph 203 and paragraphs 11.16-11.18 and 11.28 of supporting text. Insert new paragraph into HH1: <u>"The City Council will consider positively those appropriate development proposals that would ensure the repair and maintenance of heritage assets 'at risk', and will consider the use of planning obligations in appropriate circumstances."</u>	The City Council recognises the need to include reference to heritage at risk. On this basis, additional text is suggested for inclusion in Policy HH1. A composite version of policy HH1: Conserving heritage assets is included in Appendix A.	Agreed	Include additional text in Policy HH1 as set out in Appendix A. Excerpt as follows: 'Development proposals that would ensure the repair and maintenance of assets on the Heritage at Risk Register will be supported. Planning obligations may be used in these circumstances'.
Consistency of policy HH2 regarding Conservation	HH2: Conservation Areas	Unsound: We recommend adjustments to this policy	The City Council recognises the importance of Conservation Areas across the city. That said,	Agreed	Amend Policy HH2: Conservation areas, as follows:

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Areas with legislation and national policy		to ensure that it is consistent with legislation (Planning (Listed Buildings and Conservation Areas) Act 1990 s72) and national policy and that the Plan is internally consistent. Amend text: "Development proposals should will be required to conserve <u>and enhance</u> the distinctive character, <u>appearance</u>, special architectural value and historic significance of Conservation Areas. <u>In drawing up and assessing the impacts of their proposals, applicants should consult the Council's Conservation Area Appraisals and Management Plans.</u> Development proposals which would result in significant harm to a Conservation Area will <u>be considered according to</u>	it is important to note that the plan should be read as a whole and therefore it is not considered necessary to cross-reference between policies HH1 and HH2. On this basis, revisions are suggested to Policy HH2 as follows: 'Development proposals should will be required to conserve <u>and enhance</u> the distinctive character, <u>appearance</u>, special architectural value and historic significance of Conservation Areas <u>in accordance with the Council's Conservation Area Appraisals and Management Plans.</u> Development proposals which would result in significant harm to a Conservation Area will		'Development proposals should will be required to conserve <u>and enhance</u> the distinctive character, <u>appearance</u>, special architectural value and historic significance of Conservation Areas <u>in accordance with the Council's Conservation Area Appraisals and Management Plans.</u> Development proposals which would result in significant harm to a Conservation Area will only be supported if the public benefits clearly outweigh the harm.'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		the provisions in Policy HH1 only be supported if the public benefits clearly outweigh the harm.	only be supported if the public benefits clearly outweigh the harm.'		
Consistency of policy HH3 regarding archaeology with national policy	HH3: Archaeology	Unsound: While we welcome the strong resistance to harm to nationally significant archaeology contained in Policy HH3, to ensure this is consistent with national policy, this ought to encompass some flexibility. Alternative wording is proposed. "Development proposals which would cause harm to a site, monument or structure of national archaeological importance, whether scheduled or unscheduled, or which would cause harm to its setting, will not be permitted should be avoided. Development proposals will be required	The City Council recognises the importance of city's archaeology and the need for consistency with national policy. On this basis, minor additions are suggested to policy HH3 as follows: 'Harm Development proposals which would cause harm to a site, monument or structure of national archaeological importance, whether scheduled or unscheduled, including or which would cause harm to its setting, should be avoided. Development proposals will be required to preserve, and where practical,	Agreed	Include revised text within policy HH3 to read: 'Harm Development proposals which would cause harm to a site, monument or structure of national archaeological importance, whether scheduled or unscheduled, including or which would cause harm to its setting, should be avoided. Development proposals will be required to preserve, and where practical, improve access to and interpretation of nationally important archaeological remains, in situ'.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		to preserve, and where practical, improve access to and interpretation of nationally important archaeological remains, in situ."	improve access to and interpretation of nationally important archaeological remains, in situ'.		
Consistency of policy HH3 regarding archaeology with national policy	HH3: Archaeology	Unsound: NPPF paragraph 207 states that "Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation." The HIA identified many such instances on the proposed site allocations. It would therefore be appropriate for the Council to require this in Policy HH3.	The City Council recognises the importance of the city's archaeology and the need for consistency with national policy. On this basis, an additional paragraph as the third paragraph of the policy, is suggested for HH3 as follows: 'All development proposals on sites which include, or have the potential to include, archaeological interest, should be accompanied by a desk-based assessment and, where necessary, a field evaluation'.	Agreed	Include an additional paragraph within policy HH3 to read: '...if the benefits outweigh the impacts on the remains.... New paragraph: 'All development proposals on sites which include, or have the potential to include, archaeological interest, should be accompanied by a desk-based assessment and, where necessary, a field evaluation'.
Archaeology and	HH3: Archaeology	Unsound:	The City Council	Agreed.	Include additional text in

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
brownfield development		We also consider that the policy should respond to the HIA which notes that on some sites with significant archaeology, re-use of existing buildings or footings could help to achieve redevelopment with limited impact on archaeology (e.g. ref 51: 12-31 Sidwell Street, and ref 100: Fever and Boutique, Mary Arches Street). <u>"On sites where there is significant archaeology, particular consideration should be given to re-use of buildings or their foundations as a means of limiting impacts."</u>	recognises the importance of the city's archaeology and the interaction between archaeology and brownfield redevelopment. On this basis, additional supporting text is suggested for inclusion in paragraph 11.38 as follows: '...maintained within their original context. On sites where there is significant archaeology, consideration should also be given to the re-use of buildings or their foundations as a means of limiting impacts. However, when this preservation in situ is not feasible or appropriate...'		paragraph 11.38 as follows: '...maintained within their original context. On sites where there is significant archaeology, consideration should also be given to the re-use of buildings or their foundations as a means of limiting impacts. However, when this preservation in situ is not feasible or appropriate...'
Application of policy HH4 to historic buildings as well as heritage assets	HH4: Heritage assets and climate change Title of policy	Unsound: Historic England supports the aims of this policy, but we are concerned that at	The City Council recognises the importance of historic buildings and the role they play in creating the townscape of	Agreed	Include a revised name for policy HH4 to read: 'HH4: Heritage assets Historic buildings and

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		present it is not sufficiently broad or accurate to be justified, effective and consistent with national policy. When adapting and retrofitting historic buildings for climate change, a different approach is needed to buildings of modern construction to avoid maladaptation (e.g. unforeseen impacts on the buildings conservation and performance). This includes not only designated and non-designated heritage assets, but all buildings of traditional construction (generally those built before 1919 or with similar methods). These considerations would be relevant to a significant portion of Exeter's building stock, whether or not it meets the criteria to be considered a 'heritage asset'. We therefore consider the policy title needs to be adjusted.	Exeter. It is suggested that the name of the policy to be changed to 'HH4: Heritage assets Historic buildings and climate change'.		climate change'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		Change title of policy to: "HH4: <u>Historic buildings</u> Heritage assets and climate change" If necessary, references to this policy should also be adjusted elsewhere in the Plan to reflect the title.			
Application of policy HH4 to historic buildings as well as heritage assets	HH4: Heritage assets and climate change Paragraph 11.42	Unsound: While we welcome much of the supporting text, we consider this should be adjusted to include specific reference to the difference between modern and historic fabric, and to highlight that the 'whole building approach' should be taken. Amend paragraph 11.42 as follows: "11.42 Addressing and adapting to climate change may require alterations to historic buildings or	The City Council recognises the importance of historic buildings and the role they play in creating the townscape of Exeter. A small number of minor revisions are suggested in paragraph 11.41, 11.42 and 11.43 to clarify that the policy applies to historic buildings as opposed to all heritage assets and to make reference to a 'whole building approach.' 11.41 In order to safeguard our heritage assets historic buildings	Agreed	Include revisions to paragraphs 11.41, 11.42 and 11.43 to read: 11.41 In order to safeguard our heritage assets historic buildings and to sustain our cultural heritage...' '...the priority to conserve heritage assets them. Given the number of heritage assets historic buildings in Exeter it is vital that they play a role in both climate change mitigation and adaptation.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		development that affects heritage assets, including their settings. This could include development or retrofit to ensure the building's retention, energy generation, or protection from flooding. <u>It is important to be aware of the differences between modern and historic building fabric, as standardised methods (including a 'fabric first' approach) are often inappropriate for historic buildings and can impact on their character and reduce their performance.</u> A holistic view and a 'whole building' approach should be taken when considering such alterations..."	and to sustain our cultural heritage...' '...the priority to conserve heritage assets them. Given the number of heritage assets historic buildings in Exeter it is vital that they play a role in both climate change mitigation and adaptation. 11.42 Addressing and adapting to climate change may require alterations to historic buildings which affects the building fabric or development that affects heritage assets, including their settings... '...A holistic view, 'whole building' approach should be taken when considering such alterations. This should balance the need to safeguard the future of the asset historic building and its conservation...'		11.42 Addressing and adapting to climate change may require alterations to historic buildings which affects the building fabric or development that affects heritage assets, including their settings... '...A holistic view, 'whole building' approach should be taken when considering such alterations. This should balance the need to safeguard the future of the asset historic building and its conservation...' 11.43 When adapting and retrofitting historic buildings for climate change, different approaches are needed to those for buildings of modern construction. These specific approaches help to avoid maladaptation. Historic

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
			11.43 When adapting and retrofitting historic buildings for climate change, different approaches are needed to those for buildings of modern construction. These specific approaches help to avoid maladaptation. Historic England offers information...		England offers information...
Application of policy HH4 to historic buildings as well as heritage assets	HH4: Heritage assets and climate change	Unsound: NPPF paragraph 161 states that the planning system should 'encourage the reuse of existing resources, including the conversion of existing buildings...'. This is a broad statement and we believe that this encouragement should be incorporated into Policy HH4. Currently the second paragraph of Policy HH4 focuses only on 'non-	The City Council recognises importance role that historic buildings play in creating the townscape of Exeter but also their potential role in climate change mitigation and adaptation. On this basis, revisions are suggested to the text in policy HH4 as follows: 'Development proposals that contribute to addressing climate change and affect heritage assets	Agreed	Include revised in text in policy HH4 to read: 'Development proposals that contribute to addressing climate change and affect heritage assets historic buildings will only be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the heritage asset building and its setting.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		designated heritage assets', a specific group likely to include locally listed buildings and positive buildings in conservation areas. We consider that this paragraph should be re-drafted and the policy preferably re-ordered to put this positive encouragement first, as part of the Plan's positive strategy for heritage (NPPF para 203). Redraft second paragraph of HH4 and place at start of policy: "Development proposals that contribute to addressing climate change and affect non-designated heritage assets will be supported where they The repair, retrofit and adaptively reuse <u>of historic buildings should be given priority over demolition, reflecting their significance and contribution to the</u>	historic buildings will only be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the heritage asset building and its setting. Development proposals that contribute to addressing climate change and affect non-designated heritage assets will be supported where they should avoid demolition and should prioritise repair, retrofit and adaptive reuse of historic buildings to minimise embodied carbon emissions, improve energy performance and adapt to climate change in accordance with appropriate British Standards and Historic England guidance'. A composite version of updated Policy HH4 is included in Appendix B.		Development proposals that contribute to addressing climate change and affect non-designated heritage assets will be supported where they should avoid demolition and should prioritise repair, retrofit and adaptive reuse of historic buildings to minimise embodied carbon emissions, improve energy performance and adapt to climate change in accordance with appropriate British Standards and Historic England guidance'. A composite version of updated Policy HH4 is included in Appendix B.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		<u>townscape, the need to minimise embodied carbon emissions, improve energy performance and adapt to climate change. Proposals should employ a 'whole building approach' and include measures appropriate to the age and fabric of the building, in accordance with appropriate guidance and British Standards."</u>			
Consistency of policy HH5 regarding the Exeter City Walls with national policy	HH5: Conserving and enhancing Exeter City Walls	While we are very supportive of Policy HH5, an adjustment is needed to ensure that it is consistent with national policy (as per our comments on HH3 Archaeology). Scheduled Monuments are covered by the Ancient Monuments and Archaeological Areas Act. We understand that the Exeter City Council Act 1987 contains additional provisions relating to the City Wall e.g. relating to its maintenance and repair	The City Council recognises the importance of local and national policy consistency. It is also necessary to strike the right balance between supporting text and policy. On this basis, the following revisions are suggested: '11.44. The Exeter City Walls are largely designated as a Scheduled Monument, legally protected due to their national historical importance by the Ancient	Agreed	Include additional text in paragraphs 11.44 – 11.47 to read: '11.44. The Exeter City Walls are largely designated as a Scheduled Monument, legally protected due to their national historical importance by the Ancient Monuments and Archaeological Areas Act. Parts of the Walls not designated as a Scheduled Monument are likely to have equal

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		and we suggest that these are outlined in supporting text to Policy HH5. Replace reference to Exeter City Wall Act in Policy with supporting text indicating how the Exeter City Council Act 1987 relates to the City Wall.	Monuments and Archaeological Areas Act. Parts of the Walls not designated as a Scheduled Monument are likely to have equal significance and will be treated as having equal importance as part of the greater asset. The Walls are also protected under the Exeter City Council Act 1987 which introduces powers to the Local Authority to survey and, if necessary, repair the fabric of the Walls outside its ownership which is in a poor state of repair, and to recover the costs of doing so. The Act also prohibits the placing of any structure within 2 meters of the Walls, unless this has gained consent as part of a Planning Application or is a necessary function of a statutory undertaker' 11.45 Around 70% of the circuit remains intact,		significance and will be treated as having equal importance as part of the greater asset. The Walls are also protected under the Exeter City Council Act 1987 which introduces powers to the Local Authority to survey and, if necessary, repair the fabric of the Walls outside its ownership which is in a poor state of repair, and to recover the costs of doing so. The Act also prohibits the placing of any structure within 2 meters of the Walls, unless this has gained consent as part of a Planning Application or is a necessary function of a statutory undertaker' 11.45 Around 70% of the circuit remains intact, delineating the origin of the city. The Walls became subsumed by modernity as the city expanded and faced

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
			delineating the origin of the city. The Walls became subsumed by modernity as the city expanded and faced twentieth century transport infrastructure and development demands. The challenge lies in re-energising and re-imagining the significance of the Walls and all they symbolise into a sustainable future city and to celebrate the individuality of the inherited city. The presence of the Walls on the national Heritage at Risk Register highlights their vulnerability and priority for safeguarding. The Scheduled Monument designation offers the Walls a high degree of protection, both through the planning process and the parallel consenting process for Scheduled Monuments.' 11.47 Policy HH35		twentieth century transport infrastructure and development demands. The challenge lies in re-energising and re-imagining the significance of the Walls and all they symbolise into a sustainable future city and to celebrate the individuality of the inherited city. The presence of the Walls on the national Heritage at Risk Register highlights their vulnerability and priority for safeguarding. The Scheduled Monument designation offers the Walls a high degree of protection, both through the planning process and the parallel consenting process for Scheduled Monuments.' 11.47 Policy HH35 recognises the importance of the Walls Scheduled Monument to Exeter and sets out how

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
			recognises the importance of the Walls Scheduled Monument to Exeter and sets out how development will be required to respond se-to this. A composite updated version of policy HH5 is included in Appendix C.		development will be required to respond se-to this. Policy HH5 also suggested for updating. A composite updated version of policy HH5 is included in Appendix C.

10 Strategic matters: Culture and tourism

Broad summary of chapter content

- 10.1 Exeter is a historic but modern city whose compact size and location means it offers a great balance between urban and rural life. Enhancing Exeter's cultural offering will be key to future success, building the sense of place and belonging in the city. Exeter is committed to being a healthy and active city with culture embedded as standard to enable people to live fulfilled lives. This will help to promote Exeter as a city of culture and further drive the identity and attraction of the city. The Exeter Plan seeks to protect existing culture and identity whilst supporting development to play its part in enhancing cultural provision.
- 10.2 The culture and tourism chapter of the Exeter Plan includes two policies which seek to explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination whilst specifying the role for development:
- C1: Protecting and enhancing cultural and tourism facilities; and
 - C2: Development and cultural provision.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 10.3 No representations were raised regarding culture and tourism by Historic England at Regulation 19 Publication stage.

11 Strategic matters: High quality places and design

Broad summary of chapter content

- 11.1 The quality of the places in which we live and work and that we visit is fundamental for so many reasons, including to support our health and wellbeing, attract investment, generate pride in our city and help achieve our net zero ambitions. Development offers opportunities to create high quality places that respond to Exeter's distinct characteristics, reflect local culture and the historic environment, provide appropriate green space and integrate with existing communities, promoting social cohesion and healthy lifestyles.
- 11.2 The high quality places and design chapter of the Exeter Plan includes three policies which seek to deliver the development we need in high quality, liveable, connected places:
- D1: Design principles;
 - D2: Designing-out crime; and
 - D3: Advertisements.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 11.3 Historic England provided representations to policy D1: Design principles and D3: Advertisements together with some of the supporting text. These representations suggested that the content is variously sound and partially unsound.
- 11.4 The detailed representations related to high quality and design are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Design and reference to the Views, Density and Heights Study	Paragraph 13.9	Adjustment needs for consistency. Consistent with our comments elsewhere in this response, we suggest that paragraph 13.9 refers to the Stage 1 Skyline and Views report only. Suggested revision: 13.9 ... The Viewpoints, Density and Heights Study Exeter Skyline and Views Report should be referred to in preparing proposals for development.	The City Council recognises the need to clarify the reference to the Views, Density and Heights Study so it focuses on the Stage 1 report which is now referred to as the Exeter Skyline Study. On this basis, the following minor revisions are suggested: '13.9. The Viewpoints, Density and Heights Study Exeter Skyline Study should be referred to in preparing proposals for development'.	Agreed	Amend paragraph 13.9 as follows: '13.9. The Viewpoints, Density and Heights Study Exeter Skyline Study should be referred to in preparing proposals for development'.
Reference to historic value in design principles	D1: Design principles	Partly unsound. We welcome Part e of Policy D1 but request a minor adjustment to ensure that buildings are conserved according to their level of heritage significance or townscape value, and not only if this is considered to be 'high'. This will help to	The City Council recognises the need to provide a more nuanced approach to considering heritage value in development proposal design. On this basis, the following minor revision is suggested:	Agreed	Amend Policy D1: Design principles as follows: 'e. Respect the historic environment and retain and refurbish existing buildings according to their of high townscape and historic value, enhancing their setting wherever possible'.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		ensure the policy is consistent with national policy.	'e. Respect the historic environment and retain and refurbish existing buildings according to their of high townscape and historic value, enhancing their setting wherever possible'.		
Reference to the historic environment within the advertisement policy	D3: Advertisements	Sound. We welcome the explicit recognition of the historic environment within this policy as an aspect of amenity.	Support welcomed.	Agreed	No modification required.

12 Strategic matters: Health and wellbeing

Broad summary of chapter content

- 12.1 The Exeter Plan will play a part in improving health and wellbeing by providing high quality housing, supporting job creation, enabling increases in physical activity, supporting active travel, enhancing nature, supporting improvements in air quality and supporting the delivery of the health infrastructure we need.
- 12.2 The health and wellbeing chapter of the Exeter Plan includes two policies which promote inclusive development which supports communities in becoming healthier and more active:
- HW1: Health and wellbeing; and
 - HW2: Environmental quality, pollution and contaminated land.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 12.3 No representations were raised regarding health and wellbeing by Historic England at Regulation 19 Publication stage.

13 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

- 13.1 The Exeter Plan is vital in identifying the infrastructure that we need, ensuring it is provided in the right way, at the right time and in the right place. Working with key infrastructure partners will be essential to ensure that infrastructure needs can be met in this way. The City Council will continue discussions relating to cross-boundary infrastructure provision in the context of the development planned in Exeter but also close to the city in East Devon and Teignbridge and also Mid Devon.
- 13.2 The infrastructure and facilities chapter of the Exeter Plan includes five policies which will support the provision of appropriate infrastructure, address development viability and support the provision of community facilities, open space, play areas, allotments and sport:
- IF1: Delivery of infrastructure;
 - IF2: Viability;
 - IF3: Community facilities;
 - IF4: Open space, play areas, allotments and sport; and
 - IF5: New cemetery provision.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 13.3 Historic England provided a single supportive representation to policy IF5: New cemetery provision.
- 13.4 The detailed representation is discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Cemetery provision and the reference to heritage considerations	IF5: New cemetery provision	Sound. We welcome the adjustment to IF5(a) to ensure there are no unacceptable impacts on heritage assets including archaeology.	Support welcomed.	Agreed	No modification required.

14. Site allocations

Broad summary of chapter content

- 14.1 The Exeter Plan allocates a series of sites for development. The site allocations (included in Policies H2 and EJ6) have been selected in accordance with the spatial strategy for the city set out in Policy S1.
- 14.2 The majority of site allocation development will take place on five strategic mixed use brownfield sites that are located close to the city centre or key public transport hubs. The sites are identified in Policy H2 and were part of the original Liveable Exeter work.
- 14.3 Thirty-three sites are allocated for predominantly residential or residential development in Policy H2. These make up the balance of our housing requirement and provide for choice and competition in the market. The majority of the sites are brownfield in line with the spatial strategy. Some of the sites are greenfield, these sites helping to provide a mix of development opportunities to enable housing 135 delivery throughout the Plan period.
- 14.4 Three employment sites are allocated in Policy EJ6. These sites will help play an important role in meeting employment needs and supporting the growth of the city.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 14.5 Historic England provided representations to each of the five strategic mixed use brownfield allocations (Water Lane, East Gate, Red Cow, Exe Bridges Retail Park and South Gate), covered by policies SBA1-5. Each representation suggested that the policy was partly unsound.
- 14.6 The detailed representations are discussed in the following table.

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
Water Lane allocation: Heights, massing and impact on views of heritage assets	Strategic mixed use brownfield allocation: SBA1 - Water Lane	Partly unsound. Historic England supports the principle of brownfield regeneration at Water Lane and we welcome the adjustments to Policy SBA1 part J to strengthen heritage considerations following consultation on the Full Draft Plan. This is a large area located between the historic city centre and the western hills that form part of the landscape setting of Exeter. The height and massing of any new development therefore has the potential to impact adversely on views into, or out of, the historic city. Consistent with our comments elsewhere in the Plan, we request an adjustment to part J(i) to ensure an appropriate response to the evidence base. Proposed amendment:	Comment noted. The City Council recognises the strategic importance of Water Lane as a proposed development allocation and the potential impact it could have on heritage assets and strategic views as set out in the evidence for the Exeter Plan. On this basis, the following revision is suggested:	Agreed	Amend Policy SBA1: Water Lane as follows: '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.'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		"J. Conservation and enhancement of the historic environment: i. A layout and built form that seeks to <u>conserve and enhance important strategic and local views and is informed by the Exeter Views, Density and Heights Study</u> and archaeological and heritage assessment, evaluation and mitigation;" We also request confirmation that the stated capacity of 1,861 homes is consistent with the parameters contained in the adopted Liveable Water Lane SPD, as tested by the Exeter Water Lane Views Analysis.	'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.' The City Council confirms that site capacity is consistent with the parameters included in the adopted Liveable Water Lane SPD.		

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
East Gate allocation: Heritage considerations	Strategic mixed use brownfield allocation: SBA2 – East Gate	Partly unsound. While not as sensitive as North Gate and South Gate, parts of East Gate are located within conservation areas, are archaeologically sensitive, or include buildings which contribute to the townscape. The site is also in close proximity to other heritage assets and development here has the potential to impact on key strategic views. We therefore welcome the adjustments to Policy SBA2 part H following consultation on the Full Draft Local Plan, which strengthen heritage considerations. We also welcome the testing of potential site capacity, heights and massing as part of the Exeter Views, Density and Heights Study. We note that the stage 2 report	Comment noted. Comment noted.	Agreed	Amend Policy SBA: East Gate as follows: '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.'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		retains scope for retrofit and upward extension. This is positive as while the current buildings in the area are of mixed quality and condition, they do include buildings of townscape merit where exploring the scope for retention and refurbishment should be a priority in accordance with Policy D1(e). It should be noted that we would not necessarily support all of the example heights / massings for East Gate (figure 6) shown in the Stage 2 Sites Report. Our position at planning application stage would be dependent on further assessment of views and heritage impacts associated with detailed proposals (including, for example, the long view of the Cathedral from Dunsford Road). However, we consider there to be adequate			

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		flexibility around building heights and densities having regard to the site allocation capacity in relation to the example layout. Accordingly, and consistent with our comments elsewhere in this response, we request an adjustment to part H(i) to ensure an appropriate response to the evidence base. Suggested adjustment: "H. Conservation and enhancement of the historic environment: i. A layout and built form <u>that seeks to conserve and enhance important strategic and local views</u> and is informed by the Exeter Views, Density and Heights Study and	The City Council recognises the strategic importance of East Gate as a proposed development allocation and the potential impact it could have on heritage assets and strategic views as set out in the evidence for the Exeter Plan. On this basis, the following revision is suggested: 'H. Conservation and enhancement of the historic environment: i. A layout and built form <u>that seeks to conserve and enhance important strategic and local views</u> and is informed by the Exeter Views, Density and Heights Study: Exeter Skyline Study and archaeological and		

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Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		changed following the Full Draft Plan consultation) respond adequately to the new evidence base. This includes the Local Plan HIA and the Skyline and Views Report. This issue could be addressed by amending Part H of Policy SBA3. Suggested adjustment: "H. Conservation and enhancement of the historic environment: i. A layout <u>and built form that seeks to conserve and enhance important strategic and local views and is</u> informed by archaeological and heritage assessment, evaluation and mitigation; ii. A built form that enhances the character and appearance of St David's Conservation	The City Council recognises the strategic importance of Red Cow as a proposed development allocation and the potential impact it could have on heritage assets and strategic views as set out in the evidence for the Exeter Plan. On this basis, the following revision is suggested: '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		buildings and their settings and retains sight lines of locally listed St David's station.'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		Area, <u>conserves and enhances listed buildings and their settings</u> and retains sight lines of locally listed St David's station."	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.'		
Exe Bridges Retail Park allocation: Heritage considerations	Strategic mixed use brownfield allocation: SBA4 - Exe Bridges Retail Park	Partly unsound We acknowledge that priority should be given to high density development in sustainable locations including close to public transport interchanges. We welcome the introduction of a specific site allocation policy for Exe Bridges Retail Park, including part I	Comment noted	Agreed	Amend Policy SBA4: Exe Bridges Retail Park as follows: '1. Conservation and enhancement of the historic environment: i. A layout and built form that seeks to conserve and enhance important strategic and local views

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		to secure conservation and enhancement of the historic environment. We also welcome the testing of site capacity within the Exeter Views, Density and Heights Study. It should be noted that we would not necessarily support all of the example heights/massings contained in this report. For example, we have concerns that monolithic blocks and buildings of potentially 8 storeys may impact adversely on the relationship between the historic city and its landscape setting (see for example View CO4 from Bartholomew Terrace). However, we consider there to be reasonable flexibility within the range of heights across the site shown in the stage 2 report to allow for impacts to be reduced and key views better respected.	Comment noted		and is informed by the Exeter Views, Density and Heights Study: Exeter Skyline Study, and archaeological and heritage assessment, evaluation and mitigation.'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		Consistent with our comments elsewhere in this response we request an adjustment to Part I(i) to ensure an appropriate response to the evidence base. Suggested adjustment: i. A layout and built form <u>that seeks to conserve and enhance important strategic and local views</u> and is informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;”	The City Council recognises the strategic importance of Red Cow as a proposed development allocation and the potential impact it could have on heritage assets and strategic views as set out in the evidence for the Exeter Plan. On this basis, the following revision is suggested: ‘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.’		

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Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		and Heights Study. This has resulted in a reduction in the capacity of the proposed site allocation to 81 homes and we consider that there is sufficient evidence to demonstrate that this is achievable without undue impacts on the historic environment. However, 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. The Stage 2 report recommends that this opportunity is maximised, but unfortunately does not reflect this in the example massings. It may be possible to achieve the	The City Council recognises the strategic importance of South Gate as a proposed development allocation and the potential impact it could have on heritage assets and strategic views as set out in the evidence for the Exeter Plan. Significant work has been undertaken to consider the massing, density and yield on the site. Historic England have suggested that the evidence is sufficient to demonstrate that the		mitigation;'

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		stated capacity on the basis of low to mid rise buildings, in line with the 'urban neighbourhood' typology illustrated on p14 of the National Model Design Code. Therefore, consistent with our comments elsewhere in this response we request an adjustment to Part I(i) to ensure an appropriate response to the evidence base. Suggested adjustment: "H. Conservation and enhancement of the historic environment: A layout and built form <u>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 and archaeological and heritage assessment,</u>	proposed quantum of development can be accommodated without inappropriate impacts on the historic environment. On this basis, although it may be desirable in some respects to seek a finer grain of development, this is not considered to be a policy requirement, particularly as this is likely to affect scale of development and viability. In addition, the policy already requires a dense network of active travel routes. It is considered appropriate however to update the reference to the Exeter Skyline Study. In terms of the policy, the following revision is suggested: 'H. Conservation and enhancement of the historic environment: i. A layout and built form that seeks to conserve		

Issue	Element of the plan	Historic England's representation	ECC comment	Historic England's comment	Final position and suggested plan modification
		evaluation and mitigation;”	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;’		

15 Monitoring and implementation

Broad summary of monitoring framework

- 15.1 The Exeter Plan includes a monitoring framework which covers statutory and additional indicators. These are arranged according to each chapter of the plan. Not all policies include monitoring indicators.
- 15.2 The monitoring framework will form the basis of the Authority Monitoring Report.

Addressing the response of Historic England to the Regulation 19 Exeter Plan

- 15.3 Historic England provided a small number of representations regarding the monitoring and implementation chapter in the Exeter Plan in relation to the monitoring indicators for policy HH1 regarding heritage assets. These are considered in the table below. Neither issues of soundness nor legal compliance were not identified in the representations to this chapter.

Issue	Element of the plan	Historic England representation	ECC comment	Historic England comment	Final position
Conservation of heritage assets - monitoring	Monitoring framework: HH1: Conserving and enhancing heritage assets	Clarification needed. We support the inclusion of an indicator relating to the number of applications permitted contrary to the advice of Historic England. However, it is unclear whether this refers to all concerns raised, or only to objections? To ensure that the indicator is measurable, we suggest that it clarified whether this refers only to objections (which will be rare) or also to concerns raised by Historic England.	Comment noted. The City Council recognises the need for further clarity regarding this indicator. On this basis, the following minor amendment is suggested: 'Indicator: Number of applications permitted contrary to Historic England objections'. 'Target: No applications permitted contrary to Historic England advice. Zero'.	Agreed	Amend indicator HH1 as follows: 'Indicator: Number of applications permitted contrary to Historic England advice objections'. 'Target: No applications permitted contrary to Historic England advice. Zero'.
Conservation of heritage assets - monitoring	Monitoring framework: HH1: Conserving and enhancing heritage assets	Additional indicator requested. We request an additional indicator relating to the number of heritage assets in the city on the Heritage at Risk Register along with any equivalent local register. This will assist in tracking the Plan against	Comment noted. However, there are a range of factors which determine the number of assets on the Heritage at Risk Register; planning is only one part of this picture. On this basis it is not considered necessary to monitor this through the	Response noted – Historic England retains a preference that monitoring and reporting of Heritage at Risk should be incorporated as an indicator	Detailed discussions have not fully resolved this issue and any further consideration may be conducted through the Exeter Plan examination.

Issue	Element of the plan	Historic England representation	ECC comment	Historic England comment	Final position
		the statement at NPPF 203 that the positive strategy for heritage in a plan should include 'heritage assets most at risk through neglect, decay or other threats'. Insert new indicator to reflect the number of assets in Exeter on Historic England's Heritage at Risk Register along with any local register.	Exeter Plan.		
Conservation of heritage assets - monitoring	Monitoring framework: HH1: Conserving and enhancing heritage assets H15: Housing density and size mix Site allocation policies	Additional indicator requested. The Exeter Skyline and Views Assessment represents a step change in the understanding of important views across the city, to inform future development. To help provide a framework that secures the implementation of the report's recommendations, it will be beneficial if the impact of approved schemes on identified important views	Comment noted. The City Council recognises the importance of heritage assets and key views and considers the Exeter Skyline Study as important evidence to be used to inform the determination of planning applications. However, it would challenging to monitor quantitatively the number of proposals which would have a significant impact on views identified in the study. On this basis,	Noted	No modification required.

Issue	Element of the plan	Historic England representation	ECC comment	Historic England comment	Final position
		is monitored and reported on. Insert new indicator for the number of schemes approved that would result in a significant impact on an important view identified in the Exeter Skyline and Views Assessment.	an amendment is not suggested.		

16 Sustainability Appraisal and Habitat Regulations Assessment

Explanation of the SA and HRA

- 16.1 To accompany the Exeter Plan, SA and HRA have been undertaken at various stages of the plan-preparation process.
- 16.2 SA and HRA reports were provided for consultation alongside the Publication Regulation 19 draft of the Exeter Plan. Representors were able to provide representations on both these documents.

Addressing the response of Historic to the Regulation 19 Exeter Plan

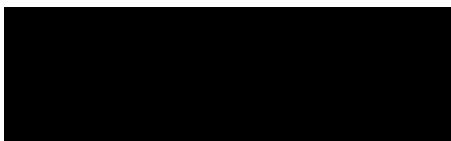
- 16.3 No representations were provided regarding the Sustainability Appraisal or the Habitat Regulations Assessment by Historic England at the Regulation 19 stage of the Exeter Plan.

17 Governance, review and signoff

- 17.1 The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon, or where there are areas of disagreement, this statement documents the issue, and that both parties confirm their respective position.
- 17.2 It is agreed that these discussions will inform the Examination of the Exeter Plan (the local plan). Both parties will continue to work collaboratively to meet the Duty to Cooperate obligations and will both continue to work proactively on the key strategic cross boundary issues identified in this document.

Date: 25.09.2025

Signed:

A black rectangular box redacting the signature of Roger Clotworthy.

Name: Roger Clotworthy

Position: Head of City Development, Exeter City Council

Date: 24/09/2025

Name: Kim Miller

Position: Development Advice Team Leader / Historic Environment Planning Adviser, Historic England

Appendix A:

Composite version of Policy HH1: Conserving heritage assets

~~Exeter's iconic and ancient heritage will continue to make an essential contribution to the liveability, culture, economy and tourism offer of the city.~~ Development proposals will be required to conserve and where appropriate enhance Exeter's rich heritage and ~~to ensure that development makes a positive contribution to the historic environment and the cultural offering and identity of the city.~~ All large scale development proposals will be required to improve access to, and interpretation of, the historic environment.

Development proposals that ~~would~~ affect designated ~~or non-designated~~ heritage assets and/or their settings will ~~only~~ be supported when they conserve and, where appropriate, enhance or reveal, the significance of the asset in the form of fabric, settings, character or appearance, and any features of special architectural, historic or archaeological interest.

Development proposals that would result in ~~substantial harm to, or loss of,~~ a designated heritage asset, ~~including Listed Buildings~~ will not be permitted unless there is clear and demonstrable justification that they are necessary to achieve ~~substantial~~ public benefits that outweigh the harm. ~~or loss.~~ Where ~~they development proposals~~ would result in ~~substantial harm to, or loss of,~~ a designated asset, they will not be permitted unless there is clear and demonstrable justification that they are essential to achieve substantial public benefits that outweigh the harm ~~less than substantial harm to the significance of a designated heritage asset, the public benefits must demonstrably justify and outweigh the harm or loss.~~

Development proposals should avoid or minimise harm to the significance of non-designated heritage assets including those on the List of Buildings of Local Importance. ~~Development proposals that~~ Where they would result in substantial harm to ~~the significance of~~ a non-designated heritage asset, including those on the List Of Buildings of Local Importance, ~~they~~ will only be supported if the public benefits ~~clearly~~ outweigh the harm.

Development proposals should seek to conserve and enhance important views according to their contribution to heritage significance and townscape value and should be informed by the Exeter Skyline Study where appropriate.

Development proposals that would ensure the repair and maintenance of assets on the Heritage at Risk Register will be supported. Planning obligations may be used in these circumstances.

Development proposals ~~that would result in harm to~~ affecting heritage assets ~~must be accompanied by a Heritage Statement / Heritage Impact Assessment. Where they development proposals~~ would result in harm to heritage assets ~~they~~ will be required to be accompanied by an appropriate mitigation strategy agreed upon by the City Council.

Appendix B:

Composite version of Policy HH4: Heritage assets and climate change (amended to historic buildings and climate change)

HH4: ~~Heritage assets~~ Historic buildings and climate change

Development proposals that contribute to addressing climate change and affect ~~heritage assets~~ historic buildings will ~~only~~ be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the ~~heritage asset~~ building and its setting. Development proposals ~~that contribute to addressing climate change and affect non-designated heritage assets will be supported where they~~ should avoid demolition and should prioritise repair, retrofit and adaptively reuse of historic buildings to minimise embodied carbon emissions, improve energy performance and adapt to climate change in accordance with appropriate British Standards and Historic England guidance.

Appendix C:

Composite version of Policy HH5: Conserving and enhancing the Exeter City Walls

The Exeter City Walls play an important role in defining the historic city, and contribute to the social, cultural and economic life of Exeter. ~~the city, and a~~ As a Scheduled Monument covered by the ~~Exeter City Wall Act~~ Scheduled Monuments and Archaeological Areas Act, are legally protected due to their national historic importance. ~~Development proposals that cause harm or restrict public access, to the Exeter City Walls will not be permitted.~~

Development proposals will be required to conserve and enhance the fabric and settings of the Exeter City Walls and to demonstrate, where feasible, that they improve public access, understanding and visibility of the Exeter City Walls. ~~Development proposals should avoid harm to the Exeter City Walls, and should not restrict public access.~~

Contributions to the repair, maintenance, enhancement and interpretation of the Exeter City Walls will be required where appropriate.