



Examination of the Exeter Plan

Matter 6 – Energy, Climate Change and Flooding

Questions 8 and 9

Historic England, Hearing Statement

February 2026

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

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

Historic England Hearing Statement

1 Introduction

- 1.1. This statement addresses the Inspector's questions with regard to Matter 6 of the Exeter Plan Examination: Matters, Issues and Questions.
- 1.2. This hearing statement should be read alongside Historic England's comments submitted during the Regulation 19 consultation on the Local Plan, along with our [Statement of Common Ground](#) (SoCG) with Exeter City Council, dated September 2025.

2 Matter 6 – Energy, Climate Change and Flooding

Issue 1 – Net Zero, Low Carbon Energy, Renewable Energy and Local Energy Networks – Policies CC1, CC2, CC3, CC4, CC5 and CC6

Q8. How has the potential impact of any necessary underground infrastructure on archaeology been considered in the formulation of policies CC3 and CC4?

2.1 Exeter contains highly significant archaeology in areas of the City Centre and at South Gate. In our response to the Regulation 19 Local Plan consultation, we therefore raised the issue that the heat network evidence relates mainly to technical feasibility. We queried whether archaeological potential had been considered as part of the evidence for proposed locations. To address this issue we proposed the following wording to be inserted into the policy or supporting text:

“Potential impacts on archaeology will need to be considered when establishing the feasibility of a heat network.”

2.2 Subsequently, through discussions with the Council under the duty to cooperate, the Council has raised the fact that a Local Development Order (LDO) has been adopted that allows local energy networks and associated infrastructure within large parts of the Exeter administrative area.

2.3 Responding to both the point we have raised, and to the existence of the LDO, we have agreed additional supporting text with the Council as part of our [SoCG](#) (p10) which is reflected in the Council’s proposed modifications ([CSD-03](#)) SAMM4.

2.4 Nevertheless, we are concerned that this LDO may facilitate works that could impact on below ground archaeology of national significance. When considered as part of a planning application, such archaeology would be considered subject to the policies for designated heritage assets (NPPF December 2024, footnote 75). It would therefore be helpful if a further modification were made to the plan, to signal a commitment by the Council to an early review of the LDO in consultation with Historic England, to ensure sufficient safeguards are in place.

Q9. Criterion e) of Policy CC4 requires the protection of the setting of heritage assets. Is this approach consistent with national planning policy in particular paragraph 207 of the Framework?

- 2.5 In Historic England's response to the Regulation 19 Local Plan consultation, we identified that criterion e) is not consistent with national policy as it does not protect the heritage asset itself, only its setting. We have suggested the following amended wording that is reflected in our [SoCG](#) on p11 and in the Council's proposed modification ([CSD-03](#)) SAMM5.

"e. Protect heritage assets and their settings ~~of heritage assets~~;"

- 2.6 Should the Inspectors consider that this wording should be more fully expressed to align with national planning policy then we can offer the following alternative:

"e. Protect the significance of heritage assets including any contribution made by their settings ~~of heritage assets~~;"