



By email:
planning.policy@exeter.gov.uk

Our ref: PL00791123
PL00794430

06 February 2025

Dear Sir / Madam,

The Exeter Plan 2021-2041: Publication Plan (Regulation 19) and evidence base

Thank you for consulting Historic England on the pre-submission (Regulation 19) Exeter Plan, Sustainability Appraisal and associated evidence base documents. As the Government's adviser for the historic environment, we are keen to ensure that conservation and enhancement of heritage assets are taken into account in the preparation of this important Plan.

Paragraph 203 of the National Planning Policy Framework (NPPF) explains that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. NPPF paragraph 16(d) states that plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. 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 heritage issues through a Statement of Common Ground and/or attendance at the Local Plan Examination if necessary.

Evidence base

In response to the previous consultation on a Full Draft Exeter Plan, Historic England requested further evidence to support strategic site allocation policies. We therefore welcome the preparation of a Views, Density and Heights Study in support of the Plan, along with a Heritage Impact Assessment for all site allocations. This has formed a key part of the evidence on which we have made a balanced judgement about the soundness of proposed site allocations and associated policies.

The Views, Density and Heights Study comprises two parts. We were a key stakeholder and adviser to the Council and its consultants on the Stage 1 Skyline and Views Report and we hope that this rich analysis will help the Council to secure forms of development that respond to, conserve and enhance some of the city's most important strategic views over the next two decades or more. Accordingly, we are keen that the policy framework within the Local Plan responds to this work and any future update or supplementary evidence on views.

In relation to the Stage 2 Sites Report, we were less involved, and our support is qualified. We recognise that this evidence goes some way to demonstrating that site capacities are likely to be achievable. When read alongside the Heritage Impact Assessment (HIA) it informs our position on whether general and site-specific policies in the Plan are, or can be made, sound, in relation to heritage considerations. However, it is a broadbrush analysis and the massings illustrated in the report are unlikely to represent an optimal solution for the strategic sites. For example, in our comments we have identified some (non exhaustive) examples of potential for harm to the settings of heritage assets that have not been adequately assessed within the Stage 2 report.

In view of these issues, it is important that the Plan is clear about some of the limitations of Stage 2. Much more work will be needed to develop effective masterplans for each site, preferably pursuing a place-shaping approach informed by detailed context appraisal and community engagement. We therefore believe that the Stage 2 report should be treated as evidence to inform the Plan and should not be given equal status to the more robust analysis in Stage 1, which we hope will also be a key consideration for future planning applications.

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.

Sustainability Appraisal

We do not wish to comment in detail on the Sustainability Appraisal at this stage.

Yours sincerely,

Kim Miller MRTPI IHBC

Historic Environment Planning Adviser (South West)

Mobile: [REDACTED]

Table of Historic England's comments on Regulation 19 Pre-Submission Draft of the Exeter Plan

Page	Section	Sound/ Unsound	Comments	Suggested Modification
4. Spatial Strategy				
16-17	S1: Spatial strategy (Strategic policy)	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.	n/a
18-21	S2: Liveable Exeter Principles (Strategic policy)	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 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 is amended as follows: "Ensure buildings are energy efficient, adopt a fabric-first approach and apply high performance standards such as Passivhaus (or appropriate standards for historic buildings under Policy HH4) and whole-life carbon assessment."

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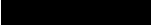
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5. Climate Change				
26	CC3: Local energy networks (Strategic policy)	Unsound – clarification requested	Historic England has previously raised the issue that the <i>Heat network evidence</i> seems to relate mainly to technical feasibility. We highlighted 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 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.	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>
27	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 consistent with national policy.	e. Protect <u>heritage assets and their settings</u> of heritage assets ;
6. Homes				
35-36	H2: Housing allocations and windfalls (Strategic policy) Strategic mixed use brownfield sites Other site allocations	Comment Comment	Please note that our comments on strategic site allocations for housing are provided against the site specific policies in Chapter 16. 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	See responses to policies in Chapter 16. Site Allocations. See responses to general development management policies.

	Site allocations ref 163 and 100	Comment	allocations, in order to secure the appropriate 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. As well as being covered by Policy H2 and the general development management policies, we 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.	See response to Policy H3 below.
36-37	H3: Regeneration opportunity areas (Strategic policy) <u>North Gate</u> HIA p108	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 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	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,

			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 requesting this soundness issue could be resolved.	12 Mary Arches Street (ref 100) is bought under Policy H3 bearing in mind the close proximity and related 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 Policy SBA5 - South Gate. 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 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
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				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 fortress. The site is within Exeter's Area of Archaeological Importance and also in the Central Conservation Area.
36-37	H3: Regeneration opportunity areas (Strategic policy) <u>Marsh Barton</u>	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 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.	In relation to Marsh Barton, we request an additional policy criterion as follows: <u>"Ensure that height and massing are appropriate to conserve strategic views and the relationship between the historic city and its landscape setting."</u>
54	H15: Housing density and size mix (Strategic policy)	Partly 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	This issue could be resolved by amending part b of the policy as follows: <u>"b. Local context, including important strategic and local views according to their contribution to the significance of heritage assets, landscape/townscape value and visual amenity."</u>

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			that the Plan contains a robust policy framework that is justified and consistent with national policy.	
7. Economy and jobs				
63-64	New transformational employment allocations	Unsound	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 contains a robust policy framework to ensure that it is effective and consistent with national policy. 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 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	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 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."</u>
	7.30 and 7.31			

	EJ6: New transformational employment allocations (Strategic policy)		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. 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</u> <u>Proposals for St Luke’s Campus will focus on the eastern portion of the site and will be informed by archaeological and heritage assessment and be guided by a masterplan/Supplementary Planning Document. Proposals should be of high quality, should consider and respond to the environmental and heritage assets on and around the site and important strategic and local views, and should be appropriate within the context of surrounding residential development.”</u>
8. Retail and the future of our centres				
66	RFC1: The future of our centres (Strategic policy)	Sound	Historic England supports new Policy RFC1 which seeks to protect, enhance and diversity Exeter’s centres and promotes enhancement of heritage assets.	n/a
70	RFC2: Development in, and affecting, our centres (Strategic policy)	Sound	We support the requirement within RFC2 that development should ‘c. Conserve and enhance the cultural, historic and natural environments of the centres’.	n/a
9. Sustainable transport and communications				
73	STC1: Sustainable movement (Strategic policy)	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.	n/a
74	STC2: The transport hierarchy (Strategic policy)	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’	n/a

76-77	STC3: Supporting active travel (Strategic policy)	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 Old Exe Bridge), and of considering potential to reflect and reinstate historic street patterns in the design and provision of active travel routes.	n/a
10. Natural environment				
86-87	NE1: Landscape setting areas (Strategic policy)	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: <u>"In addition to the Landscape Sensitivity Assessment, the Exeter Skyline and Views Report identifies some views of particular importance (see Chapter 11).</u>
95-96	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.	n/a
11. History and heritage				
97	Introduction 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	See requested changes to Policies HH1, HH2, HH3 and HH4 below.

			will help to ensure that the Plan is justified, effective and consistent with national policy.	
97	Introduction 11.3	Unsound / clarification s needed	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. <u>This The Stage 1 Skyline and Views Report identifies important views that need to be protected or enhanced, including 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 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

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				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 <u>important to note that the 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. The layouts shown have not been tested against all townscape, heritage, 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.
98	Introduction 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>
101	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,	

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	assets (Strategic 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 also ‘assessing the impacts of proposed development’. Secondly, at present policy HH1 contains an 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). 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 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.</u> Development proposals that would result in harm...” Insert text into Policy 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. 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</u>
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			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.	<u>impacts of their schemes on important views, applicants should consult the Exeter Skyline and Views Report.</u>" 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>
102	HH2: Conservation Areas	Unsound	We recommend adjustments to this 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.	<u>"Development proposals should will be required to conserve and enhance the distinctive character, appearance, special architectural value and historic significance of Conservation Areas. 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 the provisions in Policy HH1</u> only be supported if the public benefits clearly outweigh the harm."
104	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 <u>should be avoided</u>. Development proposals will be required to preserve, and where practical, improve access to and interpretation of,

			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. 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).	nationally important archaeological remains, in situ.” Insert new paragraph into Policy HH3: <u>“Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, developers should submit a desk-based assessment and, where necessary, a field evaluation.”</u> <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>
105	HH4: Heritage assets and climate change Title	Unsound	Historic England supports the aims of this policy, but we are concerned that at 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.	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.

11.42	Policy HH4		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. 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-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).	Amend paragraph 11.42 as follows: "11.42 Addressing and adapting to climate change may require alterations to historic buildings or 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 <u>'whole building' approach</u> should be taken when considering such alterations..." 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 <u>The repair, retrofit and adaptively reuse of historic buildings should be given priority over demolition, reflecting their significance and contribution to the 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>
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106	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 and we suggest that these are outlined in supporting text to Policy HH5.	“The Exeter City Walls play an important role in defining the historic city, contribute to the social, cultural and economic life of the city, and as a Scheduled Monument covered by the <u>Exeter City Wall Ancient Monuments and Archaeological Areas Act</u>, are legally protected due to their national historic importance. Development proposals that cause harm or restrict public access, to the Exeter City Walls <u>should be avoided</u> will not be permitted.” 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.
13. High quality places and design				
113	Supporting text 13.9	Adjustment needed 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.	13.9 ... The Viewpoints, Density and Heights Study <u>Exeter Skyline and Views Report</u> should be referred to in preparing proposals for development.
114	D1: Design principles (Strategic policy)	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 ensure the policy is consistent with national policy.	“e. Respect the historic environment and retain and refurbish existing buildings <u>according to their</u> of high townscape and historic value, enhancing their setting wherever possible;”
116	D3: Advertisements	Sound	We welcome the explicit recognition of the historic environment within this policy as an aspect of amenity.	n/a
15. Infrastructure and facilities				
133	IF5: New cemetery provision	Sound	We welcome the adjustment to IF5(a) to ensure there are no unacceptable impacts on heritage assets including archaeology.	n/a

16. Site Allocations				
137-140	Strategic mixed use brownfield allocation: SBA1 - Water Lane (Strategic policy)	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. 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 <u>that seeks to conserve and enhance important strategic and local views and is</u> informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;”
141-143	Strategic mixed use brownfield allocation: SBA2 - East Gate (Strategic policy)	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 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	“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 and is</u> informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;”

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			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 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.	
144-146	Strategic mixed use brownfield allocation: SBA3 - Red Cow (Strategic policy)	Partly unsound	We acknowledge that priority should be given to high density development in sustainable locations including close to public transport interchanges. We also welcome the testing of potential site capacity, heights and massing as part of the Exeter Views, Density and Heights Study. As with other sites, appropriate massings would require further testing at planning application stage. While we have no in principle objection to brownfield regeneration at Red Cow, we do not consider that the policy criteria for heritage at SBA3 part H (which have not 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.	"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 Area, <u>conserves and enhances listed buildings and their settings</u> and retains sight lines of locally listed St David's station."
147-149	Strategic mixed use brownfield allocation: SBA4 - Exe Bridges	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	"I. Conservation and enhancement of the historic environment:

	Retail Park (Strategic policy)		introduction of a specific site allocation policy for Exe Bridges Retail Park, including part I 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. 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.	i. A layout and built form <u>that seeks to conserve and enhance important strategic and local views and is</u> informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;”
150-152	Strategic mixed use brownfield allocation: SBA5 - South Gate (Strategic policy)	Partly unsound	Historic England recognises the considerable opportunity to enhance the South Gate area through brownfield regeneration and highway realignment. This is an area of high historic significance and sensitivity. We therefore welcome the adjustments to Policy SCA5 part H and the supporting text to better reflect this. There is potential for development at South Gate to have adverse impacts on highly significant views of the Cathedral and city skyline and we therefore welcome the more detailed testing of potential heights and massing within the Exeter Views, Density 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	“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</u> informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;”

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			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 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.	
17. Monitoring and implementation				
163	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.
	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 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.
	HH1: Conserving and enhancing heritage assets	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	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.

	H15: Housing density and size mix (Strategic policy) Site Allocation policies		impact of approved schemes on identified important views is monitored and reported on.	
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