

Exeter Plan

Hearing statement

Matter 12:
Historic Environment, Culture
and Tourism

April 2026

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1. Introduction

- 1.1 This hearing statement provides Exeter City Council's (the City Council's) response to the Examination Inspectors' questions raised in relation to matter 12: Historic environment, culture and tourism.
- 1.2 The statement addresses each of the two issues within matter 12:
 - Issue 1: History and heritage – Policies HH1, HH2, HH3, HH4 and HH5; and
 - Issue 2: Culture and tourism – Policies C1 and C2

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

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

- 2.1 Yes, the Exeter Plan's heritage policies are consistent with the NPPF, in particular paragraphs 206–209. In addition, the policies provide a positive strategy for the conservation and enjoyment of the historic environment, consistent with paragraph 195.
- 2.2 Policy HH1 (subject to suggested modifications set out in SMM70: CSD-03: page 120) is a strategic policy which sets a framework for development and heritage assets, clearly stating that development proposals will be required to conserve and where appropriate, enhance Exeter's heritage and supporting development proposals which will positively affect designated or non-designated assets. This is consistent with NPPF paragraph 196. The policy is also consistent with paragraphs 206 and 207 of the NPPF in stating that proposals resulting in harm to designated assets will not be permitted unless they achieve public benefit and that proposals resulting in substantial harm will not be permitted unless they achieve substantial public benefit. The policy takes a proportionate approach to considering proposals which would cause harm to undesignated assets, consistent with paragraph 209 of the NPPF. Finally, Policy HH1 provides a positive strategy for the conservation and enjoyment of the historic environment by providing support for proposals which ensure the repair and maintenance of assets at risk and by securing associated planning obligations.
- 2.3 Policies HH2 – HH5 are more detailed development management policies which work together to conserve and enhance conservation areas, archaeology and the City Walls, whilst proactively enabling historic buildings to play their role in addressing climate change. These set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF: paragraph 196), support opportunities for development within Conservation Areas (NPPF: paragraph 212), ensure the necessary evaluation of archaeology (NPPF: paragraph 200) and enable historic buildings to play a role in climate change mitigation and adaptation (NPPF: paragraph 158).

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

- 2.4 Yes, policies HH1, HH2, HH3, HH4 and HH5 are positively prepared, justified, effective and consistent with national planning policy.
- 2.5 Policy HH1 is positively prepared because it is consistent with achieving sustainable development which conserves and enhances the historic environment. Policy HH1 is justified because it provides an appropriate strategy for the positive conservation and enjoyment of the historic environment and is considered appropriate through assessment in the Sustainability Appraisal (EXM-02a: paragraph 6.341 onwards, page 215) in the context of a reasonable alternative. Policy HH1 is effective because it has been developed, including the suggested modifications (CSD-03: SMM70, page 120), through discussions with Historic England as shown in the Statement of Common Ground (DTC-03h: page 48 onwards). Finally, policy HH1 is consistent with national policy, particularly paragraphs 205 to 209 of the NPPF.

- 2.6 Policy HH2 is positively prepared because it is consistent with achieving sustainable development which conserves and enhances conservation areas. Policy HH2 is justified because it is considered appropriate through assessment in the Sustainability Appraisal (EXM-02a: paragraph 6.346 onwards, page 216) in the context of reasonable alternatives. Policy HH2 is effective because it has been developed, including the suggested modification (CSD-03: SMM71, page 29), through discussions with Historic England as shown in the Statement of Common Ground (DTC-03h: pages 52 and 53). Finally, policy HH2 is consistent with national policy, particularly paragraphs 212 and 213 of the NPPF.
- 2.7 Policy HH3: is positively prepared because it is consistent with achieving sustainable development in terms of archaeological impact. Policy HH3 is justified because it is considered appropriate through assessment in the Sustainability Appraisal (EXM-02a: paragraph 6.352 onwards, page 217) in the context of reasonable alternatives. Policy HH3 is effective because it has been developed, including the suggested modifications (CSD-03: SMM72 and 73, page 30), through discussions with Historic England as shown in the Statement of Common Ground (DTC-03h: pages 54-56 onwards). Finally, Policy HH3 is consistent with national policy, including paragraphs 200 and 205 to 209 of the NPPF.
- 2.8 Policy HH4 is positively prepared because it is consistent with achieving sustainable development in terms of heritage and climate change. Policy HH4 is justified because it is considered appropriate through assessment in the Sustainability Appraisal (EXM-02a: paragraph 6.357 onwards, page 219) in the context of a reasonable alternative. Policy HH4 is effective because it has been developed, including the suggested modifications (CSD-03: SMM74 and 75, pages 30 and 31), through discussions with Historic England as shown in the Statement of Common Ground (DTC-03h: pages 56 to 62). Finally, Policy HH4 is consistent with chapter 16 of the NPPF and chapter 14, including paragraph 157. It is also consistent with the approach set out in Historic England Advice Note 18 Adapting Historic Buildings for Energy and Carbon Efficiency¹ which states that:
- ‘Our historic buildings must continue to change and evolve if they are to both contribute to a greener future and be fit for purpose for the people who live in, experience and care for them’ (page ii).’
- 2.9 Policy HH5 is positively prepared because it is consistent with achieving sustainable development which conserves and enhances the Exeter City Walls as a key asset within the historic environment. Policy HH5 is justified because it reflects the Scheduled status of the majority of the walls and is considered appropriate through assessment in the Sustainability Appraisal (EXM-02a: paragraph 6.362 onwards, page 220). Policy HH5 is effective because it has been developed, including the suggested modification (CSD-03: SMM76, , pages 31 and 32), through discussions with Historic England as shown in the Statement of Common Ground (DTC-03h: pages 62 to 65). Finally, Policy HH5 is consistent with chapter 16 of the NPPF, including paragraph 206b.

¹ Available at:

<https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency-feb26/>

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

2.10 The following main modifications have been suggested to Policies HH1 – HH5 in the Schedule of Suggested Modifications (CSD-03):

- SMM70 (CSD-03, p29)
- SMM71 (CSD-03, p 29)
- SMM72 (CSD-03, p30)
- SMM73 (CSD-03, p30)
- SMM74 (CSD-03, p30)
- SMM75 (CSD-03 p31) and
- SMM76 (CSD-03, p31).

2.11 These suggested main modifications derive from discussions with Historic England following their representation (B-03) and are documented in the Statement of Common Ground (DTC-03h). They are required for soundness.

2.12 The modifications will ensure that the policies are positively prepared by providing a positive strategy for the historic environment and will help to achieve sustainable development.

2.13 The modifications are justified by significant discussions with Historic England as evidenced in the Statement of Common Ground (DTC-03h).

2.14 The modifications are effective and will provide greater clarity to facilitate policy delivery through the development management process.

2.15 The modifications are consistent with national policy, particularly paragraphs 195 and 196 and paragraphs 205 – 212 of the NPPF.

2.16 A series of additional / minor modifications are suggested:

- SAMM83 (CSD-03, p89)
- SAMM84 (CSD-03, p92)
- SAMM85 (CSD-03, p93)
- SAMM86 (CSD-03, p93)
- SAMM87 (CSD-03, p94)
- SAMM88 (CSD-03, p95) and
- SAMM89 (CSD-03, p97).

2.17 Depending on the nature of the discussion at the examination hearing, it may be that some of the additional, minor modifications suggested may be considered to be main modifications.

3. Issue 2 – Culture and Tourism – Policies C1 and C2

Q1. What is the difference between development that would have ‘unacceptable impacts on local amenity’ and development that would ‘not significantly harm local amenity’ in Policy C1? Is the policy sufficiently clear in these regards to be effective?

- 3.1 The Council would like to suggest a main modification to clarify the wording of this policy and to ensure that is sufficiently clear and effective (this suggested modification is not included CSD-03). The modification means that the policy would only refer to ‘unacceptable impacts on local amenity’ and therefore for end of the final paragraph of policy C1 to read:

‘... will be supported where they will not ~~significantly harm local amenity~~ have unacceptable impacts on local amenity.’

- 3.2 This revision will be effective in ensuring the impact upon local amenity is given proper consideration in the decision-making process alongside enhancing Exeter’s cultural offering.

Q2. Is it sufficiently clear what is meant by ‘large scale development’ for the purposes of Policy C2? How will the policy be implemented and how will it be effective?

- 3.3 It is clear what is meant by large scale development; it is defined in the glossary, which includes separate entries for large scale residential and large-scale commercial development (SUP-02, page 7).
- 3.4 However, for completeness, the Council would like to suggest an additional minor modification to the Exeter Plan glossary (SUP-02). The modification would involve combining the glossary’s currently separate definitions into one overall definition of ‘large scale development’. This modification would ensure further clarity.
- 3.5 The policy will be implemented through the development management process. The wording in policy C2 allows planning officers to take a proportionate, flexible and pragmatic approach to implementation, based on the type and scale of the application together with the opportunities available for cultural provision. Cultural Plans, proportionate to the proposed development, will come forward as part of the evidence in support of the application. Cultural Plans, together with support from development management officers and the City Council’s cultural team, will guide the implementation and effectiveness of the policy.
- 3.6 The policy will be effective in ensuring that opportunities for, and the benefits of, place making and cultural provision for social and cultural wellbeing are given proper consideration in the decision-making process for planning applications for large scale development.

Q3. What is a Cultural Plan and what is the justification for the requirement for one to be submitted with a qualifying development proposal in Policy C2? Could a Cultural Plan ever be required for other scales of development? Is the policy effective?

- 3.7 A Cultural Plan will set out how cultural wellbeing and cultural opportunities and provision will be integrated, proportionately, at relevant development sites. A Cultural Plan is also expected to reflect the outcomes of community engagement. It should outline deliverable actions, such as support for creative workspaces, cultural programming, or high-quality public spaces, proportionate to the development and secured through the planning process. The requirement should be applied proportionately based on the scale and context of the development, and proximity to or potential impact on cultural assets. To provide clarity regarding the requirement for, and the content of, a Cultural Plan, additional minor modification SAMM90 (CSM-03: page 97) is suggested.
- 3.8 The justification for requiring a Cultural Plan lies in the NPPF's overarching sustainable development objective which includes social and cultural wellbeing as part of strong and vibrant communities and communities, its requirement for plans to provide for the provision of cultural facilities and services and its commitment to placemaking and place shaping (paragraphs 8, 96, 97, 131, and 135 of the NPPF).
- 3.9 The evidence to justify the requirement for a Cultural Plan can be found in Exeter – A Place-based Cultural Strategy (EVB-C-01) and the wider cultural evidence base: A Public Art Strategy for Exeter (EXM-02r) and Connected Culture Cultural Placemaking Study (EVB-C-03).
- 3.10 The City Council has strong ambitions for the role of culture in Exeter and is currently working to update its Cultural Strategy (EVB-C-01). The emerging Cultural Strategy sets out a strategic approach to facilitating and delivering a cultural city and ensuring that culture runs is theme throughout whole Council. Policies C1 and C2 seek to align with and support these ambitions. A draft of the updated Cultural Strategy is to be presented to Executive Committee in April 2026², with a request to take it to consultation.
- 3.11 The policy is justified because it provides an appropriate strategy to help enhance local culture and is considered appropriate through assessment in the Sustainability Appraisal (EXM-02a: paragraph 6.367 onwards, page 223) in the context of a reasonable alternative. The Sustainability Appraisal Report (EXM-02a: p223, paragraphs 6.367 and 6.368) outlines that Policy C2 is expected to have the following effects against SA Objectives:
- SA Objective 3: Economic Growth: significant positive effect
 - SA Objective 12: Cultural Heritage: minor positive effect
 - SA Objective 4: Health: minor positive effect and
 - All remaining SA objectives: negligible effects.
- 3.12 The requirements of policy C2 are also justified by the overall strategy of the Plan to deliver high quality development, health and wellbeing and heritage and cultural diversity, the Exeter Vision 2040 (in particular the outcome to become a city of culture).

² Available here:

<https://committees.exeter.gov.uk/documents/s104543/Report%20Exeter%20Cultural%20Strategy%202026-31.pdf>

The requirements also flow from Policy S1: Spatial strategy and Policy S2: Liveable Exeter, Principle 7: Connected Culture.

- 3.13 In terms of when a Cultural Plan is required, it is not considered necessary to extend the requirement to development which is large scale because it is not considered to be proportionate.
- 3.14 Subject to suggested modification SMM90, the policy is considered deliverable and therefore effective:
- Forms of cultural provision can be provided as an integral part of development by reflecting local identity, through consultation and the provision of public space. It can also be provided as part of provision required in a Section 106 agreement. The policy therefore provides sufficient flexibility to be deliverable and effective.
 - Exeter City Council and the Connected Culture Group will be consulted regarding Cultural Plans during the development management process. (The Connected Culture Group is a sub-group of the Exeter Partnership. The Partnership operates independently of the City Council, bringing together key stakeholders to focus on opportunities for Exeter's future. The Connected Culture Group focusses on embedding cultural opportunities and represents a broad range of organisations who are involved in culture and heritage in Exeter. They have been a consultee on the Exeter Plan).
 - The requirement for a Cultural Plan as part of relevant applications will be included in an updated validation list.
 - The Connected Cultural Group will also facilitate liaison between developers and local communities for community engagements, which will be expected as part of a Cultural Plan.
- 3.15 One example of the use of Cultural Plans is the London City Plan's requirement for developers of major schemes to provide Cultural Plans as part of their planning applications. The submission draft of the City Plan 2040³ (paragraph 7.3.1) outlines that a review of planning applications following the introduction of this requirement in the previous Plan has shown that major developments are already making significant on-site contributions to the creation of cultural spaces.

Q4. Is it clear to users of the Plan how all development proposals would be 'sensitive and sympathetic to local identity and cultural practices' under Policy C2? Is the policy effective in this regard?

- 3.16 The ways in which a development proposal is sensitive and sympathetic to local identity and cultural practices will need to be considered on a case-by-case basis, dependent upon factors such as location, design and the uses proposed. This will be investigated through the development of the Cultural Plan, which will be supported by the City Council and Connected Culture Group who can facilitate liaison with local communities. Community engagement will be an expected part of the Cultural Plan process and is encouraged in the Exeter Plan for all large-scale development. Community engagement will help develop an understanding of the local area and local identity and therefore support an understanding of appropriate and proportionate

³ <https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf>

deliverable actions that are sensitive and sympathetic to local identity and cultural practices.

- 3.17 The wider cultural evidence base to support an understanding of local identity and cultural practices, and therefore the development of Cultural Plans, is the existing Place-Based Cultural Strategy (EVB-C-01), currently being updated, the Public Art Strategy for Exeter (EXM-02r) and Connected Culture Cultural Placemaking Study (EVB-C-03).

Q5. Are policies C1 and C2 positively prepared, justified, effective and consistent with national planning policy?

- 3.18 Yes, policies C1 and C2 are positively prepared, justified, effective and consistent with national planning policy.
- 3.19 Policies C1 and C2 are positively prepared because they are consistent with achieving sustainable development and delivering cultural well being. They have been prepared working in conjunction and consultation with cultural partners preparing the emerging new Cultural Strategy for Exeter and associated evidence documents.
- 3.20 Policies C1 and C2 are justified in evidence outlining the key role that development needs to play in supporting Exeter's ambitions and vision to be a city of culture and delivering the social, economic and wellbeing benefits associated with protecting and enhancing Exeter's cultural provision. These are evidenced in the Sustainability Appraisal (EXM-02a, table 6.10, page 221) and wider cultural evidence base including the Place-Based Cultural Strategy (EVB-C-01), Connected Culture - Cultural Placemaking Study (EVB-C-03) and the Public Art Strategy for Exeter (EXM-02r).
- 3.21 Policies C1 and C2 are effective as they have been developed in discussion with cultural partners. The policies will be implemented through the development management process and will provide a proportionate and flexible approach to protecting and enhancing the cultural offering of Exeter. Cultural Plans will be a validation requirement for qualifying development which, together with proportionality and pragmatism, will help to ensure the policies are effective in their delivery.
- 3.22 Policies C1 and C2 are consistent with national planning policy and themes fundamental to what the planning process should achieve. They support the delivery of:
- Sustainable development's social objective to support strong, vibrant, healthy communities... by fostering well-designed, beautiful and safe places, with accessible services and open spaces that ... support communities' health, social and cultural well-being (NPPF: paragraph 8).
 - Placemaking and the promotion of healthy, inclusive and safe communities and places which promote social interaction and include provision for health and wellbeing needs (NPPF: paragraph 96).
 - Cultural facilities and services the community needs, taking into account and supporting the delivery of local strategies to improve health, social and cultural well-being for all sections of the community (NPPF: paragraph 98).
 - The creation of high quality beautiful and sustainable buildings and places and engagement between applicants and communities (NPPF: paragraph 131).

Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 3.23 The Schedule to Suggested Modifications (CSD-03) does not include any main modifications to policies C1 and C2, but does include one additional / minor modification: SAMM90 (CSD-03: p97). This adds clarity and detail in the supporting text for Policy C2 regarding the requirement for Cultural Plans.
- 3.24 One additional minor modification is proposed in paragraphs 3.1 of this statement.

4. Summary

- 4.1 This hearing statement has been prepared by the City Council in response to questions asked in relation to Matter 12 of the Exeter Plan Examination.
- 4.2 All questions associated with Matter 12 have been answered.