



Mr Christopher Cummings
Exeter City Council

Direct Dial: 0117 975 0725

Our ref: PL00794096
10 October 2023

Dear Mr Cummings

**Re: SOUTHGATE ENVIRONMENTAL IMPACT ASSESSMENT (EIA)
SCREENING REPORT**

Thank you for your letter of 26 September 2023 consulting us about the above EIA Screening Report.

It is for the local authority to determine whether an EIA should be prepared for the proposed development. However, from the information given, we are concerned that there may be a significant impact on the historic environment.

Some of these have been identified within the screening report, but in our view the scope of any potential heritage impact is likely to be much wider than identified. We felt it would be advantageous to highlight those key assets here but will expand on them in more detail as part of our pre-application response. Those assets that potentially will be affected are -

- Scheduled city walls and the relationship with the historic townscape and road networks,
- Exeter Cathedral and the impact of the scheme on the distinctive city skyline,
- The impact of the scheme on the conservation area in particular
 - the radial routes and historic access routes,
 - Scale and mass of the surrounding buildings, many of which are listed grade I, II* and II,
 - Relationship with the historic quay, the grade II* listed Colleton Crescent and the wider rural hinterland.
- Area of archaeological importance.

We would note this is not an exhaustive list and other assets may arise through the assessment process.

Consequently, we consider that the local authority should ask the applicant to carry out a full EIA in relation to the historic environment. We would expect the EIA to contain an examination of the potential impacts upon all heritage assets likely to be affected, including designated heritage assets and their settings together with potential impacts on non-designated features of historic, architectural, archaeological or artistic interest*, since these can also be of national importance and make an important contribution to



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the character and local distinctiveness of an area and its sense of place. This covers buildings, historic open spaces, historic features and the wider historic landscape including below-ground archaeology.

In terms of the assessment process the following guidance will be of use

- *Historic Environment Good Practice Advice in Planning Notes (GPA1-3):* [<https://historicengland.org.uk/advice/planning/planning-system/>](https://historicengland.org.uk/advice/planning/planning-system/) in particular GPA 3 on The Setting of Heritage Assets (2nd edition 2017);
- *Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019);*
- *Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment* (English Heritage, 2008) [<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>](https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/)

We advise that the local authority's conservation and archaeology advisers are closely involved throughout the preparation of the Environmental Statement. They are best placed to advise on: local historic environment issues and priorities (including access to data held in the Historic Environment Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

We would also highlight at this stage the importance of a close relationship between the Landscape and Visual Impact Assessment (LVIA) and the Heritage Assessments. Heritage Assets are key visual receptors and any impact upon them would need to be considered in depth with appropriate selection of viewpoints relevant to the significance of the assets in question and the likely impacts.

Given the number of important designated heritage assets within the area, we shall be provided a detailed pre-application response in due course. We would also welcome early discussions with you in conjunction with the council in order to agree the key sites and setting issues which will need to be addressed within the EIA.

If you have any queries about the above or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Rhiannon Rhys
Inspector of Historic Buildings and Areas
Rhiannon.Rhys@HistoricEngland.org.uk



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*A Designated Heritage Asset is defined in the National Planning Policy Framework as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.

cc Owen Cambridge, Exeter City



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