
East Devon Local Plan Regulation 19 (Phase 1)

Strategic Policy HE02: Listed Buildings

Representation by Savills on behalf of Mac Mic Strategic
Land

March 2025

Introduction

1. This representation is submitted by Savills on behalf of Mac Mic Strategic Land (from hereon referred to as 'Mac Mic'). Mac Mic is a strategic land promoter with a strong reputation for delivering planning permissions that lead to high-quality development.
2. Mac Mic has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy.

Policy HE02

3. There is an internal inconsistency in the tests set out within Policy HE02 which must be addressed prior to Local Plan adoption.
4. The opening paragraph and Criterion A of the policy states at all proposals *"will be expected to: ... Conserve, enhance or better reveal those elements which contribute to the heritage significance and/or it's setting"*. This sets a binary no loss or no harm test for proposed development which, in itself is incompatible with heritage policy in the Framework (2024).
5. The policy approach in the Framework however is an integrated into the subsequent two sections of the Policy which relate to circumstances where development would cause substantial, or less substantial, harm to a heritage asset or its setting.
6. At present therefore the policy both states that there will be in effect no harm permitted but then recognises that harm could exist and explains how development proposals should respond in those circumstances.
7. Due to it in compatibility with the Framework, we recommend that the first section of Policy HE02 is deleted.