

East Devon Local Plan Historic Environment Service (HES) comments

The HES welcomes the inclusion and wording of Policies EN7 and EN8. As general comments:

- i) ‘*Scheduled Ancient Monument(s)*’ should be changed to ‘*Scheduled Monument(s)*’ throughout,
- ii) ‘*Sites and Monuments Register*’ should be changed to ‘*Historic Environment Record*’ throughout, and
- iii) ‘*County Archaeological Service*’ should be changed to ‘*Historic Environment Service*’ throughout.

<i>Chapter or Strategy no.</i>	<i>Paragraph, section no. etc.</i>	<i>Comment</i>
Ch 3. Vision for East Devon to 3031	Section 3.11	Should also reflect the historic environment, or refer to the wider environmental quality of East Devon rather than focussing on the natural environment (and referring to human created environments as ‘natural’) and ecological networks.
Ch 4. Key Issues and Objectives	Section 4.1	PPS5 Policy HE 3.1 requires LDFs to set out positive proactive strategies for the conservation and enjoyment of the historic environment. Section 4.1 should also include archaeological assets under a new heading or by either widening the section on ‘built heritage’. This should cross-reference to (g) Green Infrastructure and (h) Landscape and AONBs. After all, Biodiversity gets its own section – f.
Ch 6. Spatial Strategy	Section 6.1	Section 6.1 Refers only to the District’s outstanding ‘natural environment’. Should be natural and historic, or just outstanding environment.
	Section 6.20	Section 6.20 should refer to the historic environment.
	Section 6.23	Section 6.23 Critically should also refer to the historic and built environment as a key economic benefit. Visitor surveys tend to show that more people visit the SW for wider environmental and landscape interest, not the purely natural or ecological interest. Towns and villages are a particular draw.

Draft Strategy 5 Environment		PPS5 Policy HE 3.1 requires LDFs to set out positive proactive strategies for the conservation and enjoyment of the historic environment. This strategy should be broadened to include archaeological and built environment – or ‘historic environment’. The numbered points should reflect PPS5 Policy HE3.1.
	Section 6.24	Section 6.24 refers more generally to ‘environment’ which is welcome, but confusing given earlier use of ‘natural’ and ‘built’.
Ch 7. Green Infrastructure		PPS5 Policy HE 3.1 requires LDFs to set out positive proactive strategies for the conservation and enjoyment of the historic environment. This is probably the best section of the LDF in which to achieve this – which the draft only partly addresses.
	Section 7.11	Section 7.11 – welcome reference to GI including heritage assets. Consideration should be given to including the major prehistoric enclosure site at Redhayes as open space within the Clyst Valley Green Park.
Draft Strategy 7		Draft Strategy 7 - does not include heritage assets and should.
Draft Strategy 10		Draft Strategy 10 (and supporting text) - Consideration should be given to including the major prehistoric enclosure site at Redhayes as open space within the Clyst Valley Green Park.
Draft Strategy 13 & 14		Draft Strategy 13 & 14 – For development at Exeter Airport to be considered ‘sustainable’ it should also consider impacts on the military heritage of this important wartime site. Design solutions including potential for GI and other forms of public open space need to be mentioned.
Ch 8. Axminster		The historic character of the town centre is mentioned but not to key heritage assets in its immediate environs – a Roman fort and roads; Newenham Abbey; the Taunton Stop Line.
Draft Strategy 15		‘Environment’ only seems to refer to wildlife and habitats. Axminster contains heritage assets of national importance. With significant Green Infrastructure potential.

Ch 11 Honiton		Concentration of heritage assets in the medieval planned town, Roman Road, Roman fort at Pomeroy Wood, as well as prehistoric sites at Hayne Lane
Ch 12 Ottery St Mary		As part of the built heritage of the town there are industrial mill buildings, a medieval core to the settlement and a collegiate church. In the landscape to the west and south of the town there is evidence of prehistoric activity.
Ch 13 Seaton	Section 13.6	Section 13.6 only refers to natural environment and buildings. There is a Roman villa at Honeyditches - protected as a Scheduled Monument for which there is scope for inclusion in Green Infrastructure. The site has a lot of community interest. The Axe flood plain preserves a lot of archaeological and palaeoenvironmental material, in the form of waterlogged environmental deposits, salt pans and timber boats, as well as structures associated with the WWII Taunton Stop Line.
Strategy 20 – Point 5 Environment		The text uses the general word 'environment' but there is a bias towards the 'natural' when there is so much historic being missed.
Ch 17 Renewable etc. energy Draft Strategy 33		Welcome reference to taking account of environmental sensitivity including heritage.
Ch 18 Natural & Built Environment	Heading	Should be Historic Environment rather than Built – thereby including archaeology and historic landscape.
Ch 18	18.1	Welcome and agree with pride in the ED environment, but the text should refer to nationally and internationally important archaeological and historic landscape heritage as well as built – or combined as historic environment.
Ch 18	18.2	Welcome mention of heritage assets as part of GI. However, not just protection of these assets, GI offers the opportunity for proactive management, access and enjoyment of these assets (as required under PPS5 Policy HE 3.1).
Ch 18	18.6	Welcome reference to multi-functional networks. However, Axe Estuary text is not multi-functional as it excludes reference to significant known historic environment (former harbour, ship archaeology, salt works, Taunton Stop Line, etc.) and palaeoenvironmental evidence and

		potential.
Draft Strategy 36 - GI		Welcome commitment to GI Provision and Strategy – but note above concerns regarding its scope (e.g. narrowing of focus in the Axe Wetlands).
Ch 18	18.36	Welcome mention of Historic Landscape Characterisation.
Ch 18	18.52 to 18.56	Welcome commitment to promotion of locally distinctive design and materials. There should be reference to working with Devon County Council (Mineral Core Strategy) on the provision of such local building materials.
Draft Strategy 42		As above.
Ch 18 & Draft Strategy 43	18.58 to 18.61	Much welcome content. However, in the absence of a separate section dealing with designated and non-designated archaeology and historic landscape, there is confusion here with the various usage of ‘built environment’, Listed Buildings, Scheduled Monuments, ‘historic environment’ and heritage assets.
Ch 18		As above – there should be a short section on archaeology and historic landscapes as heritage assets (Cross-reference to Section 21.24 in the Development Management Policy section). A brief description of the range of archaeological sites and the number recorded on the Devon Historic Environment Record would be appropriate.
Ch 21 Development Management Policies	Sections 54 & 55 & Policy D1	Welcome.
Ch 21	21.24	See above comments on Ch 18. There should be earlier reference to the character of East Devon’s archaeological heritage assets and the number recorded on the Devon Historic Environment Record (not Sites & Monuments Register).
Ch 21	21.25	Should refer to the County Historic Environment Service.
Ch 21 & Policy EN13	21.32 to 21.33	A Local List of Parks & Gardens is maintained by the Devon Gardens Trust and recorded on the Devon Historic Environment Record. These should be a material consideration in planning decisions.
Ch 21	Policy LSE 1	Should include measures to retain and promote understanding of the historic environment. This could include contributions to the interpretation of the maritime archaeology of the Axe Estuary and Wetlands.