



Historic England

Planning Policy
East Devon District Council

Our refs: PL00735402,
PL00735662 &
PL00735903

By email

15 March 2021

Dear Sir or Madam

East Devon Local Plan (2021-2040) Issues and Options Consultation, Sustainability Appraisal Scoping Report and Duty to Co-operate

Thank you for consulting Historic England on the East Devon Local Plan (2021-2040) Issues and Options Consultation, Sustainability Appraisal Scoping Report and Duty to Co-operate.

As the Government's adviser for the historic environment, Historic England is keen to ensure that the conservation of the historic environment is fully taken into account at all stages and levels of the development planning process.

Our general views on the Options Consultation in this covering letter are supplemented by more detailed comments in the attached appendices. Our response has been informed by legislation, National Planning Policy Framework 2019 (NPPF) and relevant advice, in particular [GPA 1: The Historic Environment in Local Plans](#) [Historic Environment Good Practice Advice in Planning: Note 1 \(2015\)](#), [HEAN 3: The Historic Environment and Site Allocations in Local Plans \(2015\)](#), [GPA 3: The Setting of Heritage Assets \(2017\)](#) and [HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment \(2016\)](#).

East Devon Local Plan (2021-2040) Issues and Options Consultation

East Devon has a rich historic environment with a wide range of designated and non-designated heritage assets from prehistoric to 21st century. These include part of the Jurassic Coast World Heritage Site, scheduled monuments, listed buildings, conservation areas and registered parks and gardens. There are also many locally important historic buildings and structures, archaeological sites and parks and gardens some of which are identified in the List of Local Heritage Assets or in other sources such as the Devon Historic Environment Record and the Devon Gazetteer of Parks and Gardens of Local Historic Interest. East Devon also benefits from extensive areas of Area of Outstanding Natural Beauty and rural, estuarine and coastal landscapes of importance in their own right as well as providing the settings for individual heritage assets.

As you will see from our responses to the questions in the Issues and Options Consultation document in Appendix 1 to this letter, we have found much to welcome in this document. However, there are some matters that we would like to draw to the Council's attention.

- **Holistic nature of the historic environment:** the conservation and enhancement of East Devon's heritage assets and their positive contribution to local character and



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distinctiveness cannot be not confined to one issue or policy. We have pointed out some key inter-relationships between different issues, including tackling climate and biodiversity emergencies for example. We encourage the Council to understand and positively respond to the potential implications and opportunities for its heritage assets in integrated manner across all relevant objectives, strategies, policies and explanatory texts as part of its positive strategy for the historic environment, e.g. objective 6 in relation to the historic environment's contribution to local character and distinctiveness.

- **Consider and provide for the conservation, enhancement and enjoyment of all heritage assets:** we would encourage the new local plan to not focus on built heritage assets and designated heritage assets but cover all heritage asset categories and types, including heritage at risk. This affects the wording objective 7 but will also be relevant in the new local plan's approach to historic environment strategy, policies and supporting text, as well as where the historic environment is cross-referenced in other strategies, policies and supporting text where appropriate.
- **Evidence base for allocations and designations:** the new local plan will be developing a spatial strategy and allocating future residential and employment development to specific settlements and sites. It may also identify suitable locations for large-scale infrastructure, facilities and utilities, including larger-scale wind farms and designating Coastal Change Management Areas. These have the potential to negatively impact on the historic environment and must be informed by up-to-date and relevant historic environment evidence to inform decisions about their suitability for allocation/identification/designation, their capacity for development and the need for any specific mitigation, management or enhancement measures and/or policy criteria. We would welcome early discussions on this matter bearing in mind NPPF 2019 paragraphs 31, 35, 184 and 185 and draw your attention to advice in [HEAN 3: Site Allocations](#) (2015).
- **Heritage topic paper and positive strategy for the historic environment:** we strongly recommend the preparation of a Heritage Topic Paper as part of the Council's evidence base for the new local plan. This should consider:
 - current state of East Devon's historic environment;
 - key issues in terms of understanding, conserving, enhancing and enjoying East Devon's historic environment as well as the wider benefits this brings including for local character and distinctiveness;
 - how effective the adopted local plan has performed in relation to these issues, the delivery of a positive strategy for the historic environment (as in NPPF paragraph 185) and against its own objectives for delivering sustainable development in respect of the historic environment; and
 - how the new local plan intends to positively respond to these matters.

Your Council's conservation and archaeology advisers would be well-placed to advise you on these matters and we would also welcome a meeting to discuss this further.

Sustainability Appraisal Scoping Report

Historic England has not had the capacity to consider the Sustainability Appraisal Scoping Report in the consultation period. We apologise for this and will provide our comments as soon as we can in what will be Appendix 2 to this letter.



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Duty to Co-operate

Historic England responded to Duty to Co-operate email regarding the new local plan in December 2020 and we are pleased to see our comments captured in the Duty to Co-operate Report (January 2021). We note your subsequent email of 19 January 2021 seeking our views on additional substantive matters relating to cross boundary, strategic issues for consideration in preparing the new local plan. We note that no historic environment issues are identified in the table and have the following suggestions for your consideration:

- The Jurassic Coast World Heritage Site is a designated heritage asset that extends into Dorset Council's area and as such, we consider its conservation should be identified as an issue.
- Given East Devon's coastline, we might expect to see matters of seascape and the marine-terrestrial planning overlap identified as strategic matters.
- The Blackdown Hills Areas of Outstanding Natural Beauty extend beyond East Devon District Council's boundaries while the settings of the East Devon and Dorset AONBs could cross boundaries. This may be what is already captured under the Landscape strategic matter?
- Unfortunately our GIS is down at the time of writing this letter and as such I am unable to check if there are any designated heritage assets (including heritage at risk) that straddle or are close to the boundaries between East Devon District Council and neighbouring local authorities where cross-boundary co-operation may be required to achieve a consistent approach to their conservation and/or enhancement, e.g. the setting of Dolbury Hillfort scheduled monument, grade II* listed Killerton House and grade II* Registered Park and Garden; and the setting of Lambert's Castle scheduled monument. However, this is something your conservation and archaeological advisers should easily be able to advise you on.
- Devon Historic Environment – the use and management of the Devon HER may also be a matter that you wish to identify given the NPPF's direction on its role in the planning system as per paragraphs 187, 189 and 199.

Most of these issues are likely to be addressed through the plan preparation process to which Historic England is statutory consultee as well as being prescribed body under the Duty to Co-operate.

Thank you once again for consulting Historic England on the new East Devon Local Plan. We look forward to working with you on the matters raised in our response, especially the historic environment evidence base for allocations/designations and a Heritage Topic Paper.

Yours faithfully

Rebecca

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Appendix 1: Historic England Comments on East Devon Local Plan (2021-2040) Issues and Options Consultation (Regulation 18) – January 2021

Question Section	Support/ Object/ Comment	Comments
Question 1 - Local Plan Objectives	Support/ Comment	<p>Historic England strongly supports the inclusion of the following objectives for the new local plan:</p> <ul style="list-style-type: none"> • Objective 2: Tackling the climate emergency • Objective 5: Promoting vibrant town centres • Objective 6: Designing beautiful and healthy spaces and buildings • Objective 7: Our outstanding built heritage <p>However, we wish to see changes to the wording of objectives 6 and 7 so that they:</p> <ul style="list-style-type: none"> • recognise the positive contribution that the historic environment can make to local character and distinctiveness and high quality, beautiful development in East Devon; and • seek to conserve and enhance all types of heritage assets in East Devon, not just built heritage and all levels of significance as per chapter 16 of the NPPF 2019. <p>Our suggested wording is as follows:</p> <ul style="list-style-type: none"> • Objective 6: To promote high quality beautiful development that sustains and enhances local character and distinctiveness and is designed and constructed to meet 21st century needs. • Objective 7: To conserve and enhance our outstanding built heritage historic environment.
Question 3 - Neighbourhood Plans and the new Local Plan	Comment	<p>Historic England would like to draw your attention to HEAN 11: Neighbourhood Planning and the Historic Environment (2018) for when existing neighbourhood plans are being reviewed and/or new neighbourhood plans are being prepared. Based on our experience of neighbourhood planning, we would like to highlight the need to consider the resourcing and support necessary to provide an up-to-date and proportionate historic environment evidence base for neighbourhood plans, especially where they allocate land for development.</p>
Question 4 - Planning for health and wellbeing	Comment	<p>Historic England would welcome recognition that the historic environment can make a positive contribution to health and wellbeing. Historic England has published research that demonstrates that interaction with heritage or the historic environment can be a positive factor in supporting individual and community health and wellbeing. Improvements public realm, parks and the provision of cycling and walking infrastructure can also offer ways of improving people's understanding, enjoyment and access to heritage assets, e.g. provision of interpretation. Along with better air quality, they can also offer as well as opportunities for their conservation and enhancement of heritage assets and their settings. Relevant guidance can be found in Streets for All (2018) and the South West version (2018) and GPA 3: The Settings of Heritage Assets (2017).</p>



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Question 6 – Provision of solar arrays/farms and windfarms	Comment	<p>Historic England would welcome acknowledgement that the historic environment (an irreplaceable resource) is vulnerable to climate change. We consider that climate change is one of the most significant and fastest growing threats to people and their cultural heritage. We recognise the need for positive action and are committed to achieving net zero carbon emissions by 2050 as a signatory to the Joint Heritage Sector Statement on Climate Change and member of Climate Heritage Network.</p> <p>Historic England considers that looking after and learning from the historic environment contributes positively to overall sustainability and can help with climate change mitigation and adaptation. We believe that energy efficiency, sustainable technology and reducing carbon emissions are compatible with the conservation of our heritage.</p> <p>Historic England has recently published HEAN 15: Commercial Renewable Energy Development (2021), which contains relevant advice in relation to options 1 and 2. It includes advice on the assessment of significance and harm in plan-making in relation to preparing policies and maps. It lists useful information sources and recommends the involvement of the local authority's archaeological and conservation advisers. It also advises on how to approach the assessment of large-scale development proposals for wind power, solar photovoltaics (PV) and biomass and energy and waste (EfW) on cultural heritage and avoid and reduce harm to significance.</p> <p>If option 1 is chosen, we would welcome early engagement with East Devon District Council on the historic environment evidence base needed to identify suitable areas for renewable energy developments and in particular the methodology for the heritage impact assessment work that would be necessary to support any allocations.</p>
Question 7 - Carbon saving measures	Support/ Comment	<p>Historic England notes the various issues and policies that may be included to work towards carbon neutrality as listed in 4.8. However, we consider that the positive contribution of East Devon's historic environment has been missed in reducing carbon emissions. Research by Historic England has found that retaining, reusing, refurbishing and retrofitting existing buildings should be a priority for meeting the Government's net zero carbon target by 2050, taking into account their embodied carbon. We can reduce the carbon emissions of historic buildings by over 60% by 2050 if we take whole building and whole of life carbon approaches.</p> <p>We offer information on many related topics including the installation of renewable energy generation, saving energy and energy efficiency and historic buildings, to help advise on how this can be undertaken while minimising negative impacts on the historic environment. We have also recently published HEAN 14: Energy Efficiency and Traditional Homes (2020). We would strongly encourage the Council to consider how policies in the new local plan can achieve the compatible goals of conserving the historic environment, achieving sustainability, and adapting and mitigating for climate change.</p> <p>We note the intention to encourage tree planting. We would like to highlight that actions for nature recovery and enhanced biodiversity, including identifying sites for nature-based solutions to address climate change and ecological emergencies, can</p>



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		<p>also affect the historic environment. We consider that proportionate heritage impact assessments should be undertaken for all potential sites to identify affected heritage assets and their settings, and to consider how alternative options could first avoid, then minimise and mitigate any negative impacts on their significance. There may also be opportunities for new habitats to be created that would also enhance the significance of heritage assets and their settings.</p> <p>With tree planting, for example, care needs to be taken in the choice of places, species and sizes to avoid and/or minimise any negative impacts on the significance of heritage assets, either directly (e.g. damage or destroy buried heritage assets or affect foundations of buildings or other structures) or indirectly (e.g. affect the setting of historic buildings or the character of wider landscapes and seascapes). In planning new tree and hedgerow planting, there may also be important opportunities to gather valuable archaeological and palaeoecological information in terms of understanding past woodland landscapes and traditional tree planting and management (e.g. coppiced woodland and osier beds) to make informed decisions about the location and type of planting.</p> <p>In wetland areas, changes to hydrology will have a potential impact on the buried archaeological and palaeoecological resource. This may be positive if desiccation of sensitive sites or erosion of vulnerable buildings or archaeology is prevented, but in the case of already compromised resources, rewetting may be highly destructive. Programmes of base level recording and on-going monitoring may be needed where proposals affect wetland areas, mires and peat.</p> <p>If peatland restoration is proposed as a form of carbon capture and storage, it should be noted that we do not yet fully understand the impact on sensitive archaeology. Historic England is actively considering how heritage can be integrated in proposals for peatland works/management in advance of publication of the England Peat Strategy later this year. Appropriate methods for peatland restoration would need to be devised with input from historic environment specialists from the outset.</p> <p>Further information and advice can be found on preserving archaeological remains in situ in Preserving Archaeological Remains (2016), particularly Appendix 3 on Water Environment Assessment Techniques and Appendix 4 on Water Monitoring for Archaeological Sites and in the following draft scientific review on Peatlands and the Historic Environment (2010).</p> <p>Coastal erosion and flooding can also adversely affect the historic environment and again, we would welcome acknowledgement of this given the density of designated and non-designated heritage assets located on East Devon's coastline as well as wider areas of important, historic townscape, landscape and seascapes. Coastal archaeological sites can include intertidal and coastal peat, which can be recorded on a national database. Some heritage assets at threat of flooding and erosion are on Historic England's Heritage at Risk Register. Infrastructure and management schemes, including the designation of coastal change management areas and use of Sustainable Drainage Systems (SuDs), intended to address erosion and flooding can also impact on the historic environment. Historic England offers a lot of relevant advice on flooding, resilience and recovery, flood remediation measures and coastal change.</p>



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		We would encourage the Council to consider both the implications and opportunities for the historic environment – an irreplaceable resource - in the new local plan's policy responses to both climate and ecology/biodiversity emergencies.
Question 11 – Additional housing policy objectives, Question 12 - Preference for location for future job provision & Question 14 – Additional economic policy objectives	Comment	<p>When it comes to allocating or identifying land for housing development (including accommodation for gypsies and travellers) and employment growth, Historic England is keen to ensure that this process is informed by an up-to-date and robust historic environment evidence base bearing in mind NPPF 2019 paragraphs 31, 35, 184 and 185. Further information on site allocations in local plans can be found in HEAN 3. This includes a site selection methodology to help ensure that land is not allocated that will harm the significance of heritage assets, including their settings, and that site allocation policies contain appropriate criteria to ensure harm to the historic environment is avoided and minimised, while enhancements are maximised.</p> <p>We would also ask you to consider how allocations and standards that housing and employment policies in the new local plan can be used to promote addressing heritage at risk as part of a positive strategy for the historic environment. For example, there may be opportunities to allow residential and/or business uses in the countryside if this would bring redundant, underutilised or 'at risk' historic farm buildings back into active use. Flexibility with standards can also contribute to the same outcome.</p> <p>We would welcome early discussions with the Council about its evidence base for the new local plan including for allocations.</p>
Question 16 – Additional town centre policy objectives	Support/ Comment	<p>Historic England welcomes the recognition of the challenges facing historic town centres and high streets, including responding to COVID-19 and the impacts of Use Classes Order changes. We strongly support the intention to promote the vitality and viability and welcome mention of encouraging a diverse range of retail, commercial, community and leisure uses as well as encouraging greater use of vacant upper floors. Many of these town centres and high streets are conservation areas and/or contain heritage assets. This approach could help reduce the number of historic buildings becoming redundant, underutilised or 'at risk' as well as bringing those that are back into active use.</p> <p>While we would welcome the greater use of masterplans for town centres, especially if these seek to promote heritage-led regeneration, there could also be a useful role for preparing and/or updating conservation area appraisals and management areas in identifying opportunities for development that would better conserve and enhance conservation areas. This may include the positive contribution that appropriately designed public realm improvements can make to streetscape and townscape. Further information and advice on protecting vitality and historic character of town centres and high streets can be found on our website.</p>
Question 17 – Designing beautiful spaces and	Support/ Comment	Historic England welcomes the intent for the new local plan to address the emerging 'beauty' agenda and deliver high-quality, well-designed and sustainable development, places and spaces using the National Design Code, local design guidance and



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buildings & Question 18 – Additional design policy objectives		<p>codes, masterplanning as well as policies in the new local plan.</p> <p>While we are pleased to see that landscape character assessment will be used to help inform site selections and development parameters, we draw your attention to our responses to Questions 11, 12 and 14 and the need for an up-to-date and robust historic environment evidence base, such as heritage impact assessments, to inform site selection. Seascape assessment should also be considered in East Devon's coastal areas. Further information on site allocations in local plans can be found in HEAN 3 (2015).</p> <p>That said, we welcome the intent to use masterplanning as part of the local plan instead of later on in the development process. Where it is informed by appropriate historic environment evidence, masterplanning can help understand the suitability of sites for allocation and identify their capacity and the need for site-specific mitigation and/or enhancement measures and allocation policy criteria.</p> <p>Finally, we would encourage the Council to give greater consideration in the plan preparation process to:</p> <ul style="list-style-type: none"> • promoting the inter-relationships between issues of beauty, design and the positive contribution that the conservation of the historic environment can make to local character and distinctiveness of East Devon's places and spaces; • the role of urban characterisation, historic area assessments and conservation area character appraisals and management plans as ways of better understanding the contribution of heritage assets to local character and distinctiveness and opportunities for improved understanding, conservation, enhancement and enjoyment; and • how local plan allocations/identifications and policies could be used to encourage heritage-led development and/or regeneration for successful place-shaping and achieving high quality, sustainable design in sensitive historic environments. <p>Further information about place-making and design can be found on our website.</p>
Question 19 - The importance of conserving and enhancing heritage assets	Support/ Comment	<p>Please see our comments on the wording of chapter 9 and objective 7 in response to Question 1.</p> <p>Historic England strongly supports the intention of the new local plan to focus on the conservation and enhancement of East Devon's rich historic environment. Given the heritage assets are an irreplaceable resource, the statutory duties in Planning (Listed Buildings and Conservation Areas) Act 1990 and national policy in chapter 16 of the NPPF 2019, we consider it is 'absolutely essential' that the new local plan and the work of the Council should conserve and enhance the historic environment. We also welcome mention of:</p> <ul style="list-style-type: none"> • that heritage assets are an irreplaceable resource



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		<ul style="list-style-type: none"> • that heritage assets should be conserved, enhanced and enjoyed for their contribution to the quality of life for existing and future generations • the importance of maintenance and management of heritage assets to sustain and enhance their significance • the contribution of heritage assets to regeneration and high-quality design • the relationship between health and wellbeing and the historic environment • that the historic environment contributes to wider social, economic and environmental benefits • mention of the East Devon List of Local Heritage Assets • highlighting the Council's Heritage Strategy. <p>However, we have several comments about the information presented in chapter 9:</p> <ul style="list-style-type: none"> • the text should better highlight the full range of East Devon's designated and non-designated heritage assets as paragraphs 9.1-2 focus almost entirely on built heritage, including listed buildings and conservation areas (please note in 9.7 that 'non-designated' should be used as per the terminology in NPPF 2019 instead of 'undesignated'). • Given the extent of East Devon's countryside and coastline, we would expect to see greater mention of historic landscapes and seascapes alongside streetscape and townscape • Heritage at risk should be mentioned – East Devon has 41 designated heritage assets on Historic England's Heritage at Risk Register 2020. However, this does not cover all designated heritage assets or any non-designated heritage assets. How will the new local plan promote development that secures the long-term conservation and enhancement of heritage at risk? • We might expect to a more comprehensive summary of key NPPF requirements from chapter 16, including the role of the Devon Historic Environment Record; the need to understand significance of affected heritage assets, including their settings; the great weight to be afforded to the conservation of designated heritage assets; how harm to, or loss of, heritage assets should be avoided or minimised; how harm/loss should be weight against public benefits (or other tests); and how opportunities for development that enhances or better reveals the significance of heritage assets and their settings should be encouraged. • The text could usefully cover the role of conservation area character appraisals and management plans, supplementary planning documents and guidance in conserving and enhancing the historic environment in support of local plan policies. • We would expect to see an explanation of the relationship between the adopted Heritage Strategy (2019) and the requirement of the NPPF 2019 for plans to 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 (paragraph 185). How will the new local plan contribute to the delivery of the aims, themes and actions identified in this Strategy? <p>In response to the above and in terms of identifying other matters that the new local plan should address, we strongly</p>



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		<p>recommend the preparation of a Heritage Topic Paper as part of the Council's evidence base. This should consider:</p> <ul style="list-style-type: none"> • current state of East Devon's historic environment; • key issues in terms of understanding, conserving, enhancing and enjoying East Devon's historic environment as well as the wider benefits this brings including for local character and distinctiveness; • how effective the adopted local plan has performed in relation to these issues, the delivery of a positive strategy for the historic environment (as in NPPF paragraph 185) and against its own objectives for delivering sustainable development in respect of the historic environment; and • how the new local plan intends to positively respond to these matters <p>We would welcome early discussions on this matter.</p>
Question 20 - Development in protected landscapes	Comment	<p>Historic England welcomes mention of the World Heritage Site in chapter 10. However, it should be noted that it is a designated heritage asset and should also be acknowledged in chapter 9.</p> <p>In relation to Areas of Outstanding Natural Beauty, Historic England is keen to ensure that the positive contribution of cultural heritage to the charm and character of Areas of Outstanding Natural Beauty (AONBs) is recognised. The National Planning Policy Framework (NPPF) 2019 states that the conservation and enhancement of cultural heritage is an important consideration in AONBs. We also note that the Landscapes Review (2019) included a proposal to make the purpose of AONBs explicitly include cultural heritage. This may be a matter for the Council to consider in the new local plan.</p> <p>We would also like to see the text acknowledge other inter-relationships between landscape and the historic environment. For example, registered parks and gardens are areas of protected, designed landscape and designated heritage assets, wider historic townscapes, landscapes and/or seascapes often provide the settings for, and hence contribute to the significance of heritage assets. How does the new local plan intend to address these matters?</p>
Question 21 – Net gains in biodiversity	Comment	Please see our comments in response to Question 7 in respect of the issues and opportunities for the historic environment in relation to on and off-site net biodiversity gains.
Question 22 – Additional natural environment policy objectives	Comment	<p>Historic England notes the various issues and potential policies that may be considered. Some of these have implications – positive as well as negative - for the conservation and enhancement of East Devon's historic environment. For example:</p> <ul style="list-style-type: none"> • open space/green wedges between settlements may help conserve the settings of conservation areas or particular heritage assets • the expansion of the Clyst Valley Park may offer opportunities for improved understanding, conservation, enhancement



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		<p>and enjoyment of the area's heritage assets, including heritage at risk</p> <ul style="list-style-type: none"> encouraging less manicured green spaces may negatively impact on the significance of some heritage assets or their settings coastal erosion can cause damage to and/or the loss of heritage assets and the designation of coastal change management areas can also affect the historic environment in various ways, e.g. how heritage assets are conserved, used or managed within CCMAs, the potential for creating future 'at risk' heritage assets in CCMAs and how relocated existing uses may affect the setting and significance of heritage assets. See also our response to Question 7. <p>These and other matters will need to be considered and supported by an appropriate evidence base, potentially including appropriate historic environment assessments, to inform allocations/identifications/designations and associated policy provisions related to the conservation and enhancement of the historic environment.</p> <p>Finally, we would highlight the potential for greater use of urban characterisation, historic area assessments, conservation area appraisals and management plans, and seascape assessment in addition to landscape character assessment.</p>
Question 24 - Additional sustainable transport policy objectives & Question 26 – Additional infrastructure and service provision policy objectives	Comment	<p>Historic England would like to draw the Council's attention to the potential impacts that transport, infrastructure, facilities and utilities development can have on the historic environment. The construction of transport-related development and other infrastructure can result in harm to or loss of heritage assets and their settings. However, the provision of walking and cycling infrastructure, for example, can also play a role in conserving and enhancing the historic environment by improving the settings of heritage assets (sometimes in combination with the provision of blue green infrastructure), improving access to heritage assets and creating a sense of place and tangible links with local history. Public realm improvements associated with transport projects (or undertaken in their own right) can, if carefully designed, integrate well with and enhance the historic environment and local distinctiveness.</p> <p>We are concerned to ensure that the site/route selection process is informed by proportionate heritage impact assessments to understand their suitability and capacity for allocation and identify opportunities for conservation and enhancement of heritage assets, as well as the need for any site-specific mitigation and enhancement policy criteria.</p> <p>Further information can be found on the need for an up-to-date and robust evidence base and site selection methodology in GPA1: The Historic Environment in Local Plans (2015) and HEAN 3: Site Allocations (2015). Relevant guidance can be found in Streets for All (2018) and the South West version (2018), which also includes the contribution that reducing street clutter and street lighting can make to improving the character and appearance of historic streets and public open spaces. Historic England also provides advice on The Settings of Heritage Assets (2017) in which it is explained that the way in which we experience a heritage asset in its setting can be affected by visual impacts and also by other environmental factors.</p>



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		<p>The provision of facilities and utilities can impact on the significance and settings of heritage assets as well as seascape. For example, the provision of community facilities could re-purpose a redundant historic building while the provision of underground services can affect archaeological sites while the installation of masts and other telecommunication equipment and cabling can affect the fabric of listed and historic buildings (depending on their location) as well as the settings of heritage assets.</p> <p>Historic England would like to encourage the Council to consider the relationships between some community infrastructure and the historic environment and how the Infrastructure Delivery Plan, planning obligations and Community Infrastructure Levy (CIL) could be used to conserve and enhance heritage assets as part of a positive strategy for the conservation and enjoyment of the historic environment as per NPPF paragraph 185.</p> <p>For example, new development may directly or indirectly affect heritage assets and/or may depend on historic places and/or spaces to provide required infrastructure and facilities. These heritage assets may have increased demands placed on them and CIL could be used to contribute to their repair as well as any improvements. Enhancement schemes may be identified in Conservation Area Management Plans and Neighbourhood Plans, for example.</p> <p>Planning obligations could be used (where appropriate) to secure improvements to, and the mitigation of, adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of heritage at risk buildings or other heritage assets, for example.</p>
Question 27 - Retaining and refining the existing settlement hierarchy, Question 28 – Broad distribution of housing development & Question 29 - Future options for the type and location of development	Comment	<p>Historic England notes the need to develop a strategy for the distribution of housing development and that the Council is producing evidence to inform which settlements go into each settlement tier and the form of future development.</p> <p>We would generally support the Council's efforts to identify and allocate brownfield sites, big and small, to help reinforce the form and pattern of East Devon's historic settlements, their character and identity in an appropriate response to context. In turn, this can help to limit the coalescence of historic settlements, sprawl into the countryside and less accessible and sustainable forms of development. This approach may also help with the heritage-led regeneration of rundown historic areas and opportunities to address detracting features in conservation areas as identified in conservation area character appraisals and management plans, and/or potentially some heritage at risk.</p> <p>In terms of the preparation of the overall spatial strategy and the options for other development forms, including expanding existing towns and villages and the creation of new towns or villages, our key concern is how the Council will approach establishing the capacity for every settlement in the existing hierarchy to meet the spatial strategy commitments and levels of growth envisaged without causing significant harm to the historic environment. This would be inconsistent with legislation, national policy, guidance and advice, rendering the spatial strategy relatively unsustainable and the new local plan potentially unsound.</p>



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Question Section	Support/ Object/ Comment	Comments
		<p>National policy requires that significant adverse impacts on heritage assets be avoided and, wherever possible, alternative options employed that reduce or eliminate such effects. Consequently, we would welcome the Council's clarification that the development of the spatial strategy will not predetermine the capacity of every settlement and that further evidence (e.g. assessment of the heritage and landscape capacity and more detailed heritage impact assessments where necessary) will inform the numbers and site selections for each settlement. Again we would welcome further discussions with the Council on this and the historic environment evidence base for the new local plan.</p>



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