
East Devon Local Plan Regulation 19 (Phase 1)

Strategic Policy HE04: Archaeology and Scheduled Monuments

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 HE04

3. For the same reasons as we object to Policy HE02, we also object to Policy HE04.
4. The opening sentence a Policy HE04 establishes a requirement to "*protect*" schedule monuments and other archaeological artefacts whether designated or not. If this policy statement is to be complied with then there could be no harm arising from development, however, the policy later goes on to state that:

"Where a development proposal will lead to less than substantial harm to the significance of such remains, this harm will be weighed against the public benefits of the proposed development."
5. The policy approach is therefore inconsistent as it is setting two separate and incompatible tests for development proposals. To remove this incompatibility in the Policy and the inconsistency with the Framework, the opening sentence of Policy HE04 should be deleted.