



By email:  
[LocalPlan@eastdevon.gov.uk](mailto:LocalPlan@eastdevon.gov.uk)

Our ref: PL00735903  
PL00735662

23 January 2026

Dear Sir / Madam,

**East Devon Local Plan – Second Regulation 19 Pre-Submission Local Plan and Sustainability Appraisal**

Thank you for consulting Historic England on this second consultation on a revised pre-submission (Regulation 19) East Devon Local Plan, Sustainability Appraisal and associated evidence base documents. As the Government’s adviser for the historic environment, we are keen to ensure that conservation and enhancement of heritage assets are taken into account in the preparation of this important Plan.

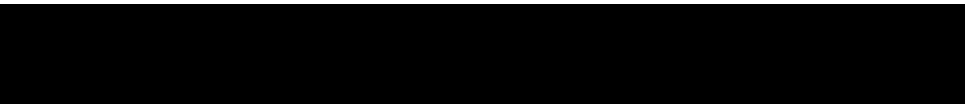
These comments should be read alongside our response to the Regulation 19 consultation, dated 30 March 2025. The comments and issues raised by that response remain our position, unless it is expressly stated in this response that those have changed or been resolved.

**Sustainability Appraisal**

We do not wish to comment in detail on the Sustainability Appraisal at this stage.

Yours sincerely,

Kim Miller MRTPI IHBC  
Historic Environment Planning Adviser (South West)



**Table 1. Historic England’s comments on 2<sup>nd</sup> Regulation 19 Pre-Submission Draft of the East Devon Local Plan**

Page	Section	Sound/ Unsound	Comments	Suggested Modification
<b>Chapter 2. Vision</b>				
22-23	Table I. Plan Objectives	Sound	We support the proposed adjustment to the terminology of Objective 7 to refer broadly to the ‘historic environment’ rather than only ‘built’ heritage.	n/a
<b>Chapter 4. Development at the West End</b>				
51-52	4.6 Marlecombe Vision	Comment	We broadly welcome adjustments to the Vision to now refer to the setting of historic farmsteads, traditional field patterns and country lanes as a factor in forming a rich character for the new settlement. We also welcome the steer towards local materials such as stone and render finishes, with labour supported by local skills and educational programmes.	n/a
52-	Strategic Policy WS01: Development of Marlecombe new community east of Exeter	Partly sound, partly unsound	<p>We support the adjustment to the policy on p53 to state that the development should draw inspiration from the local context and historic environment to create rich local character. This goes some way to addressing our comments on the previous version of the plan.</p> <p>Nevertheless, we continue to suggest that the policy should state how development will address heritage assets or historic landscapes within and around the site, including:</p> <ul style="list-style-type: none"> <li>- provisions to encourage identification of heritage assets and features – including listed buildings and wood pasture/parkland – that may be positively integrated into the scheme as focal points, for public access or to inform a distinct character for the community,</li> <li>- provisions to ensure that proposals seek to conserve and enhance designated and non-designated heritage assets and their settings in a</li> </ul>	<p>n/a</p> <p>Amend policy to include appropriate heritage provisions, thus securing a positive strategy for the conservation and enhancement of the historic environment consistent with NPPF para 196 and associated policies.</p>

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			manner appropriate to their significance, including the potential for undiscovered archaeology.  We note and broadly support the raising of proposed densities in the town centre, to make effective use of land, subject to the detailed design of future proposals being sensitive to the local context.	n/a
70	Strategic Policy WS07: Employment land north of the airport, adjoining Treasbeare	Sound	We welcome the additional policy text requiring heritage impact assessment and mitigation, with careful consideration of design.	n/a
73-74	Strategic Policy WS09: Clyst Valley Regional Park	Comment	We note that the policy has been updated in response to our previous comments to refer to a 'Masterplan' rather than a 'Management Plan', which is helpful. Our requested clarification to the supporting text has not been incorporated.	n/a
78	Strategic Policy WS12: Employment land at Sandygate, between M5 and Clyst Road	Comment	We note the addition of the word 'Ancient' in policy WS12, however this clarification is not needed as the correct term is 'Scheduled Monument' <a href="https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/">https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/</a> .	Delete word: 'Ancient'
<b>Chapter 5. Development in the Towns and Villages</b>				
<b>Strategic Policy SD01: Exmouth and its development allocations</b>				
85-88	Land at St John's (Exmo_20)	Unsound	While we welcome the additional text within this policy requiring that any overarching planning application is accompanied by a detailed HIA, and that through masterplanning an 'extensive area' must be established around the church in which built development will not be allowed, we are nevertheless concerned that a swathe of land north and east of the church is included in the proposed site allocation.  We note and wish to query the additional information contained in the evidence base. While the policy itself	To minimise harm to heritage assets, we suggest that development is restricted to the southern part of the site, and that the quantum of development and proposed range of uses is restricted to that which can be accommodated there.  If employment land, which is not justified by the needs of the district, would result in harm to the significance of heritage assets,

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			<p>states that 'Built development will need to be concentrated in the southern parts of the site', the map and housing figures in the <a href="#">Site Selection report Addendum – Historic Environment Site Assessment Exmouth</a> (p38 onwards) suggest that the proposed development would comprise of isolated parcels on all sides (north, east and south) of the church, off-set by a buffer area. The impact assessment primarily relies on 'visual connectivity' and does not represent a robust assessment of the potential impact on the significance the church derives from its setting, critically failing to consider impact on tranquillity. This is a major concern.</p> <p>We note that the proposal for vehicle access from the B3179 to the north across this land is retained. Please refer to our detailed comments on this matter in our letter dated 30 March 2025. We are concerned that the new policy text relating to the road commences with the words 'The only exception to this constraint will be provision of an access road...'. While this may be intended to relate to the Minerals Safeguarding Area referred to in preceding paragraphs this is not clear. This should be clarified. As an aside, it is also unclear whether housing could be delivered immediately adjacent to a Minerals Safeguarding Area without jeopardising potential future operations?</p> <p>While the indication that street lighting should be avoided on the access road is to be welcomed, as is potentially the requirement for 'screening', the effectiveness of this in mitigating heritage impacts would depend on the location and design of both the road and any associated planting. The noise that this road would generate within the tranquil setting of the grade II* listed Church of St John the</p>	<p>then this should be removed from the allocation.</p> <p>Access arrangements to the south or east of this area should also be sought. For example, could access be gained via a new road passing through Exmo_18 (Land east of Liverton Business Park) to the south, or from the housing estate to the west?</p> <p>Impact assessments should follow appropriate published guidance, which includes <a href="#">The Historic Environment and Site Allocations in Local Plans</a>, and <a href="#">The Setting of Heritage Assets</a>.</p>

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			Wilderness is also a concern that planting would not address.	
89-90	Exmouth town centre Police Station (Exmo_50)	Sound	We welcome the proposed wording changes to this policy which address the issues raised in our Regulation 19 consultation response.	n/a
<b>Strategic Policy SD02: Axminster and its development allocations</b>				
91	Land west of Musbury Road (Axmi_01a)	n/a	We welcome the removal of this site from the plan as there are known areas of archaeology in the vicinity.	n/a
91-93	Land east of Musbury Road (Axmi_02, Axmi_08 and Axmi_09)	Unsound	<p>Please refer to our comments on the Regulation 19 Local Plan consultation, which outline the significance of Roman archaeology in this location and potential impacts on it. We wish to reiterate the potential for considerable harm, both to non-designated archaeology potentially of equivalent significance to Scheduled Monuments, and to the setting of the adjacent Scheduled Monument, which may render this site unsuitable for development.</p> <p>The revised site allocation policy includes a number of commitments which we broadly welcome, including:</p> <ul style="list-style-type: none"> <li>- for archaeological field evaluation prior to the submission of a planning application</li> <li>- that a masterplan for the site should be informed by this</li> <li>- that development should conserve the setting of the Scheduled [Ancient] Monument and associated archaeological remains and address how adverse effects can be minimised and made acceptable and heritage-related public benefits realised;</li> </ul> <p>However, it has not yet been demonstrated that the aims of the policy are achievable. We are aware of ongoing field evaluation on land within the proposed site allocation. Until the conclusions of this work are published and used</p>	<p>This site allocation should be prioritised for removal from the plan, unless it can be demonstrated that the policy is justified and effective, on the basis of proportionate evidence.</p> <p>When adequate information is available, consider whether the site should be removed from the plan, or whether adjustments to the proposed use, mix, or quantum of development can be made to secure an appropriate form of development.</p> <p>We strongly question whether any employment land can be justified in this location, given the potential harm to heritage in the context of over-allocation of employment land within the plan generally.</p>

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			to inform a concept masterplan, we do not consider it has been demonstrated that the site allocation policy, range of uses and quantum of development are justified or effective.	
94	Websters Garage, 9 Lyme Street (Axmi_23)	Sound	We support the changes to the wording of this policy to ensure that the character and appearance of the conservation area is conserved and enhanced.	n/a
<b>Strategic Policy SD03: Honiton and its development allocations</b>				
96	Land adjacent to St Michaels Church (Honi_07)	Unsound	<p>We note that Honi_12 has been removed from the site allocation. However, our principal concerns were with Honi_07 close to the grade II* church and lychgate, and grade II Former Sextons House.</p> <p>While adjustments to the policy in relation to the location of open space within the site, and to manage scale, design, lighting and materials are welcome, we suggest that these are adjusted to ensure that all aspects of design respond to both the designated heritage assets and National Landscape.</p> <p>It is unclear whether the stated capacity of 30 homes is achievable on this site with the recommended mitigation and we therefore request that a concept plan is provided to justify the site allocation and that, if necessary, the site capacity is reduced accordingly.</p> <p>It is also important that the Local Plan recognises the 'at risk' status of the Church of St Michael and All Angels (a church in the process of closure) and takes steps to address this. This is consistent with the 'positive strategy for the conservation and enjoyment of the historic environment' required by the NPPF.</p>	<p>We request a concept plan to justify the proposed capacity for the site allocation and that, if necessary, the capacity is reduced accordingly.</p> <p>We suggest the following adjustments to the policy, taking the amended text as a starting point:</p> <p>"... Therefore a high-quality development scheme is required for the site, <u>which is appropriate to the Blackdown Hills NL and conserves the setting of nearby listed buildings with carefully located</u> <del>with areas of open space and landscaping, being located to reduce the impact of development on the setting of adjacent listed buildings and the</del> <u>appropriate</u> scale, design, lighting and materials of new development <del>being appropriate to the Blackdown Hills NL.</del>"</p> <p>"The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. To secure public</p>

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				benefits that offset harm to heritage assets, contributions will be sought <u>to secure the beneficial use and public access to the Church of St Michael and All Angels.</u>
96-97	Land at Middle Hill, Church Hill (Honi_13)	Unsound	<p>We note the additional policy text stating that “Areas of open space should be located to reduce the impact of development on the setting of adjacent listed building and the scale, design, lighting and materials of new development should be appropriate to the Blackdown Hills National Landscape”.</p> <p>However, we continue to have significant concerns given the location and scale of development proposed on a site immediately adjacent to the grade II* Church of St Michael and All Angels and its graveyard, with potential for very significant setting impacts.</p> <p>At the time of our site visit, it appeared that a single storey dwelling was being constructed on the site of a former outbuilding.</p>	We continue to recommend that Honi_13 is removed from the plan.
97	Land at Kings Road (Honi_18)	Comment	While we welcome the additional policy text to assist in conserving the setting of grade II listed Copper Castle former toll house, the land immediately north of the road should also preferably be kept open, or the policy amended to ensure that the boundary hedgerow is retained and enhanced with tree planting.	<p>Suggested additional policy text:</p> <p><u>“New homes adjacent to Axminster Road should be set back from the road, with the boundary hedgerow retained and enhanced with new tree planting.”</u></p>
<b>Strategic Policy SD04: Ottery St Mary and its development allocations</b>				
99	Land south of Strawberry Lane (GH/ED/27)	Sound	We welcome the additional policy text to clarify that archaeological assessment will be required prior to development commencing. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
<b>Strategic Policy SD05: Seaton and its development allocations</b>				
101-102	Land west of Axeview Road (Seat_13a)	Unsound	The site is north of, and immediately adjacent to, a sizeable Scheduled Monument: Roman and earlier	We recommend that this site allocation is removed from the Plan.

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			<p>settlement at Honeyditches – a heritage asset of the highest significance according to the NPPF. Please refer to our comments on the Regulation 19 Local Plan.</p> <p>Proposed amendments to the wording of the policy relate to habitats and do not address any of the issues we have previously raised. We are aware that geophysical assessment and an HIA have been carried out. However, our view remains that that this site is unsuitable for development due to its impact on the significance of the Scheduled Monument as a result of development physically and visually separating the monument from its agricultural setting. Impacts on non-designated archaeology are also likely.</p>	
<b>Strategic Policy SD07: Development allocations at Broadclyst</b>				
104	Land west of Whimble Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
<b>Strategic Policy SD11: Development allocations at Woodbury</b>				
107	Land Off Globe Hill, Woodbury (Wood_09)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
107-108	Land at Gilbrook (Wood_10)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
108	Land south of Broadway (Wood_16)	Sound	We welcome the additional policy text in relation to Woodbury Conservation Area. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a

<b>Strategic Policy SD17: Development allocations at Exton</b>				
112-113	Land north and east of Exton Farm (Wood_28)		<p>We welcome the additional policy text requiring that the design and layout of development should conserve and enhance the rural setting of grade II* listed Exton Farmhouse, including through the provision of public open space in the northern part of the site.</p> <p>However, it is unclear whether the stated capacity of 39 homes is achievable on this site with the recommended mitigation and we therefore request that a concept plan is provided to justify the site allocation and that, if necessary, the site capacity is reduced accordingly.</p>	We request a concept plan to justify the proposed capacity for the site allocation and that, if necessary, the capacity is reduced accordingly.
<b>Strategic Policy SD20: Development allocations at Kilmington</b>				
114-115	Land east of George Lane (Kilm_09b)	Comment	<p>We welcome the additional text to this policy, both to ensure retention of adequate parking for the listed pub and in relation to its setting.</p> <p>However we recommend additional adjustments to ensure that this is clear, justified and consistent with national policy.</p>	<p>This suggested adjustment to the policy working takes the amended text as a starting point:</p> <p>“A sensitively designed scheme will also be essential to avoid potential for adverse impacts on the listed adjoining public house as both a heritage asset and a locally valued community facility, including through the retention of appropriate car parking (sufficient to meet at least the needs of the public house as a going concern), <del>and</del> <u>careful consideration conservation of the significance that it derives from its setting and retention/enhancement of appropriate boundary planting.</u></p>
<b>Strategic Policy SD21: Development allocation at Musbury</b>				
115-116	Land at Baxter's Farm (Musb_01a)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a

<b>Strategic Policy SD23: Development allocation at Otterton</b>				
118	Land north of Behind Hayes (Otto_01)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
<b>Strategic Policy SD25: Development allocation at Plymtree</b>				
119	Land north of the School (Plym_03)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
<b>Strategic Policy SD26: Development allocation at Sidbury</b>				
119-120	Land south of Furzehill (Sidm_34)	Sound	We welcome the additional policy text, highlighting the presence of Sidbury Castle Scheduled Monument and clarifying design requirements to conserve and enhance the settings of heritage assets. This resolves the issues we raised in our response to the Regulation 19 Plan.	n/a
<b>Strategic Policy: SD29: Development allocations at Whimble</b>				
122	Land at Station Road (Whim_11)	Sound	We welcome the additional policy text to clarify design requirements to conserve and enhance the settings of heritage assets. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
122-123	Land west of Bramley Gardens (Whim_08a)	Sound	We welcome the additional policy text to clarify that archaeological assessment will be required prior to development commencing. This resolves the issue we raised in our response to the Regulation 19 Plan.	n/a
<b>Chapter 6. Mitigating Climate Change</b>				
128-130	Strategic Policy CC03: Promoting low carbon and renewable energy	Unsound	<p>We note that the policy no longer restricts wind farm development to defined areas shown on the Policies Map. We do not object to this due to concerns that the evidence base did not adequately consider potential heritage impacts and led to the identification of sites likely to result in significant harm.</p> <p>However, we also note a move away from a preference to smaller scale turbines. This further increases the importance that changes are made to the policy criteria to</p>	<p>We request the following changes to CC03, which takes the amended text as a starting point:</p> <p>““A. There are no significant adverse impacts on the environment that cannot be satisfactorily mitigated, including individual and cumulative <u>harm to designated and non-designated heritage assets including from impacts on their settings, landscape</u></p>

			ensure adequate consideration of impacts on the significance of heritage impacts. We therefore re-iterate proposed wording changes to the policy.	and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species controlled waters/the water environment and sites of ecological/geological importance;"  New clause:  "Proposals for wind farms should be accompanied by a Heritage Impact Assessment and a Landscape and Visual Impact Assessment supported by visualisations."
<b>Chapter 7. Adapting to Climate Change</b>				
144	Policy AR05: Development affecting coastal erosion	Sound	We note and welcome the additional text at paragraph 7.13 highlighting that in cases that may affect the Jurassic Coast World Heritage Site will also need to meet the requirements of Policy PB10. This addresses our comment on the Regulation 19 Local Plan.	n/a
<b>Chapter 8. Meeting Housing Needs</b>				
162	Policy HN07: Householder annexes, extensions, alterations or outbuildings outside settlement boundaries	Sound	We welcome the addition of policy text to ensure that proposals respond appropriately to the character of the building and area. This addresses the matter raised in our Regulation 19 consultation response.	n/a
<b>Chapter 9. Supporting the Economy and Town Centres</b>				
175-177	Policy SE02: Employment development in the countryside	Unsound – adjustment requested	Policy SE02 includes a new section on New Agricultural Buildings. While this appears a helpful addition to the plan, we request that clause A is amended to ensure that heritage is taken into account, particularly bearing in mind that many rural farmsteads are historic.	Requested adjustment to policy:  "A. It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, <u>heritage</u> , biodiversity and landscape of the rural area particularly within the NLs."

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<b>Chapter 10. High Quality Design</b>				
202	Strategic Policy DS01: Design and local distinctiveness	Sound	We welcome the additional text in clause 11 to highlight that alternative approaches to 'fabric first' are often desirable when dealing with historic buildings. This addressed the issue raised in our response to the Regulation 19 Local Plan.	n/a
203	Policy DS02: Housing density and efficient use of land	Unsound	We object to the replacement of a reference to 'optimising density' with a reference to 'maximising the number of new homes and density'. This is inconsistent with both the NPPF 2024 and new draft NPPF 2025, and indeed internally inconsistent with the statement that development should be 'compatible with the site setting and characteristics' (a statement which we support).	Remove the word maximise and refer to 'optimising' density, consistent with the NPPF.
<b>Chapter 12. Our Outstanding Landscape</b>				
230	Policy OL04: Areas of strategic visual importance	Unsound	While we appreciate the intension of the additional text at 12.13 which suggests that the policy '...ensures that views relating to heritage assets are protected for their contribution to the asset's significance', the text in Policy OL04 does not achieve this aim. We suggest that the supporting text is further adjusted, better reflecting the change requested in our response to the Regulation 19 Local Plan.	The suggested wording below takes the amended text as a starting point:  'It ensures development does not detract from the visual integrity, identity, and scenic quality characteristic of East Devon, <del>and ensures</del> <u>It should be noted that views relating to heritage assets are protected for their can be a feature of the setting that makes a contribution to the asset's significance, which in turn is protected by heritage policies in the NPPF and Local Plan</u> '.
<b>Chapter 13. Our Outstanding Biodiversity and Geodiversity</b>				
271	Policy PB10: Protection and enhancement of the Dorset and East Devon / Jurassic Coast World Heritage Site	Comment	We welcome the additional text at paragraph 13.48 to ensure that applicants and decision makers refer to UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context. This addresses the issue we raised in our Regulation 19 Local Plan response.	n/a

<b>Chapter 14. Open Space and Sports and Recreation</b>				
282	Policy OS05: Leisure and recreation developments in the countryside	Sound	We welcome the addition of 'heritage' within matters for consideration within Part A of the policy. This responds to the issue we raised in our Regulation 19 response.	n/a
<b>Chapter 15. Our Outstanding Historic Environment</b>				
286	Strategic Policy HE01: Historic environment	Sound	We welcome the addition of text to Policy HE01 to ensure it is clear that applicants must assess the impact of their proposals on significance.  We also welcome the adjustments to paragraphs 15.8 and 15.9 which broadly align with the changes requested in our response to the Regulation 19 Local Plan.	n/a
287-289	Policy HE02: Listed buildings	Sound	We welcome changes to the third part B of this policy and to paragraph 15.12 which respond to matters raised in our Regulation 19 response.	n/a
291	Policy HE04: Archaeology and Scheduled Monuments	Sound	We welcome the removal of the reference to 'exceptional cases' in this policy as a point of clarification. This responds to an issue raised in our Regulation 19 response.	n/a
292-293	Policy HE05: Historic Landscapes, Parks and Gardens	Sound	We support the adjustments to this policy which address issues raised in our Regulation 19 response.	n/a

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