



By email:
LocalPlan@eastdevon.gov.uk

Our ref: PL00735903
PL00735662

30 March 2025

Dear Sir / Madam,

East Devon Local Plan Consultation - Regulation 19 Pre-Submission Local Plan, Sustainability Appraisal, Duty to Cooperate Statement and Infrastructure Delivery Plan

Thank you for consulting Historic England on the 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.

Paragraph 196 of the National Planning Policy Framework (NPPF), December 2023, explains that plans should 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. NPPF paragraph 16(d) states that plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. While we broadly welcome many of the policies and proposals in the East Devon Plan, in particular those policies relating to heritage, landscapes and design, it is important to note at this stage that we have major concerns about some of the proposed site allocations. In addition to this there are a number of general development management policies that we consider unsound, and many others that would benefit from adjustment.

Many of the site allocation policies contain criteria relating to heritage, which respond to the findings of the Historic Environment Site Assessment (within the site selection reports) and/or to our previous comments. We welcome these and have not commented on them all individually. Instead, we have focused our comments on those policies that we consider to be unsound at present, or where adjustments would help to ensure a sound plan and a positive strategy for heritage. Where

possible, we would be willing to work with East Devon District Council to try and resolve some of our concerns in advance of the Examination.

NPPF transitional arrangements

In accordance with the transitional arrangements contained in Annex 1 of the NPPF (December 2024) this response is made having regard to the plan-making policies contained in the NPPF (December 2023). However, as decision-making policies in the new NPPF are operative from the day of its publication, we have taken account of these where we consider this to be helpful.

Sustainability Appraisal

We do not wish to comment in detail on the Sustainability Appraisal at this stage. However, please note our comment on its findings in relation to landscape and heritage for Policy CC03.

Infrastructure Delivery Plan

We request that the Council considers adding to the IDP any heritage assets that have been identified as 'at risk' in East Devon, whether on a national or local register. There would be a particularly strong rationale for this, and greater potential for public benefits, in situations where the asset is close to potential areas of new development and population growth and where there are opportunities to secure or improve public access. Historic England's [Heritage at Risk Register](#) is available online. For East Devon the register includes [Poltimore House](#), as well as numerous churches and archaeological monuments. Poltimore house is a grade II* listed building, placing it amongst those assets "of the highest significance" according to the NPPF. The house, along with 13 acres of its grounds, is managed by a charitable trust.

Duty to Cooperate Statement

Within the Duty to Cooperate Statement, Table 1 provides a summary of strategic matters along with the Council's view on whether issues raised have been resolved. This correctly identifies that Historic England has raised the potential impact of wind farms on heritage assets (specifically in relation to the identified 'suitable areas') as an issue. However, we do not agree that this matter has been resolved and we therefore ask that this is amended. Please see our detailed response to Strategic Policy CC03. Paragraph 4.26 will also need to be amended.

Yours sincerely,

Kim Miller MRTPI IHBC
Historic Environment Planning Adviser (South West)
Development Advice Team Leader (Greater London – secondment)

Table 1. Historic England’s comments on Regulation 19 Pre-Submission Draft of the Exeter Plan

Page	Section	Sound/ Unsound	Comments	Suggested Modification
Chapter 2. Vision				
20-21	Our local plan vision	Clarification requested	<p>We are supportive of the Local Plan vision insofar as it relates to heritage and we welcome the reference at 2.5 to regenerated town centres, many of which include areas of historic character.</p> <p>We also welcome the reference at 2.9 to protecting and enhancing ‘built heritage assets’ but as not all heritage assets are buildings (for example Registered Historic Parks and Gardens and some Scheduled Monuments) we request that this is broadened to refer to the ‘historic environment’. This will ensure that the plan is consistent with relevant legislation and national planning policy.</p>	<p>“2.9. Our beautiful and diverse countryside, National Landscapes, world class Jurassic coast, nature reserves and <u>the historic environment including built heritage assets</u> will be protected and enhanced.”</p>
21-22	Table I. Plan Objectives	Sound	We are supportive of many of the Plan Objectives, in particular those relating to Promoting vibrant town centres, Our outstanding built heritage, and Supporting sustainable and thriving villages.	n/a
Chapter 3. The Spatial Strategy				
37-38	Strategic Policy SP04: Employment provision and distribution strategy	Comment	We note that the Plan proposes a large amount of employment land over and above the stated need. Where individual site allocations that include proposed employment land have potential to result in significant harm to heritage assets, this suggests that the allocation is unlikely to meet the soundness test of being ‘justified’.	In situations where there is no demonstrable need for employment land, and where development would result in harm to heritage assets, we recommend that the proposed site allocation (or the portion of it that contributes to employment provision), is removed from the Plan. Please refer to our comments on individual site allocations.
Chapter 4. Development at the West End				
50-54	Strategic Policy WS01: Development of a second new	Unsound – adjustment requested	At present we do not consider that Policy WS01 represents a positive strategy for the historic environment.	Suggested adjustments to policy text:

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	community east of Exeter		<p>This issue can be resolved through modest adjustments to the Plan.</p> <p>We support the requirement for development to follow a masterplan that will cover the whole new community. While we are also supportive of the requirement to build distinctive high quality design, this statement in itself does not help to secure the stated aspiration (in the vision) that design should be innovative and “draw inspiration from the local context, including the unique surrounding historic environment, to create a rich character”. To ensure that the policy framework is clear (consistent with NPPF paragraph 16d) and provides a clear design vision and expectations at an early stage (consistent with policies in NPPF Chapter 12) we request that the policy is adjusted to secure these aspirations as policy commitments.</p> <p>We welcome the commitment to minimum densities, with higher densities in centres. This is consistent with the NPPF aspiration to make effective use of land. This in turn can help to reduce pressure for development in other locations where there may be greater impacts on the environment, including heritage.</p> <p>However, we are concerned that at present the policy says nothing about how development will address heritage assets or historic landscapes within and around the site, responding to NPPF paragraph 196 and other policies in Chapter 16. We believe that this should include:</p> <ul style="list-style-type: none"> (i) a commitment to innovative design that responds to local character (as above), (ii) provisions to encourage identification of heritage assets and features – including listed buildings and wood pasture/parkland – that 	<p>“Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis. The new community will be built to distinctive high quality design standards, <u>drawing inspiration from the local context including the unique surrounding historic environment, to create rich character. Design should also be innovative, with an explicit focus on sustainable construction and building operation and renewable energy production and use...</u>”</p> <p>Amend policy to include appropriate heritage provisions, thus securing a positive strategy for conservation and enhancement of the historic environment consistent with NPPF para 196 and associated policies.</p>

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			(iii) may be positively integrated into the scheme as focal points, for public access or to inform a distinct character for the community, provisions to ensure that proposals seek to conserve and enhance designated and non-designated heritage assets and their settings in a manner appropriate to their significance, including the potential for undiscovered archaeology.	
59	Strategic Policy WS05: Exeter Airport and its future operation and development	Unsound – adjustment requested	The airport area is close to the grade II* Church of St Michael and other designated heritage assets. There are also a range of non-designated heritage assets associated with the WWII airfield within and around the site. We therefore request additional provisions within this policy, consistent with the approach to other site allocation policies affecting heritage assets.	The policy should refer to the need to conserve and enhance designated and non-designated heritage assets and their settings, including the grade II* Church of St Michael and the WWII heritage of the airfield.
60-61	Strategic Policy WS06: Employment land east of airport	Comment	While we welcome the commitment to archaeological assessment and heritage impact assessment (HIA) on this site, the approach of requiring these explicitly within the site allocation policy is not used consistently throughout the Plan. In particular, HIA is not generally referred to for other site allocations. It may therefore be preferable that for all relevant sites these requirements are established by Strategic Policy HE01: Historic environment, and Policy HE04: Archaeology and Scheduled Monuments.	Review approach to requiring archaeological assessment and HIA as part of site allocation policies throughout the Plan, perhaps ensuring that the former is included on those sites where it is a critical pre-commencement requirement. To ensure that HIA is secured on all relevant sites, amend Strategic Policy HE01.
62-63	Strategic Policy WS07: Employment land north of the airport, adjoining Treasbeare	Unsound – adjustment requested	As with Strategic Policies WS05 and WS06, this site is in relatively close proximity to a range of designated and non-designated heritage asset. We request that an additional policy criterion consistent with those policies.	The policy should refer to the need to conserve and enhance designated and non-designated heritage assets and their settings, including grade II Treasbeare Farmhouse.
65-66	Strategic Policy WS09: Clyst Valley Regional Park	Clarification needed	The boundary of the Clyst Valley Regional Park contains many designated and non-designated heritage assets, including extensive areas of historic parkland. We note that specific policy criteria relating to heritage have been	Adjust policy: “Development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement

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			<p>removed since the Draft Plan. However, we acknowledge that the first paragraph of Policy WS09 requires development to support the objectives of the CVRP Management Plan. A minor adjustment is needed to clarify whether this refers to the 25 year masterplan, which itself contains a broad objective relating to heritage?</p> <p>With this in mind, it would also be helpful if the objectives of the masterplan were listed in supporting text, to ensure it is understood that green infrastructure is a broad concept which, in the context of Clyst Valley Regional Park, will focus on eight defined objectives.</p>	<p>of the objectives in the CVRP <u>25 Year Masterplan Management Plan.</u></p> <p>Supporting text paragraph 4.39: “A 25-year masterplan for the Regional Park, approved by EDDC in February 2021, won the 2021 RTPI South West Award for Planning Excellence and was a finalist in the national RTPI awards 2022. <u>The objectives contained in the masterplan come under the eight headings of: people, education, nature, climate, water and soil, landscape, heritage, and employment.</u>”</p>
70	Strategic Policy WS10: Development next to the M5 and north of Topsham	Adjustment requested	As site WS10 is contiguous with WS12 we request similar text in relation to the setting of Clyst St Mary Bridge.	Additional policy text: “Towards the north of the site <u>development should conserve the setting of Clyst St Mary Bridge, which is a Scheduled Monument.</u> ”
Chapter 5. Development in the Towns and Villages				
76-80 Strategic Policy SD01: Exmouth and its development allocations				
	Land west of Hulham Road (Exmo_47)	Unsound	The relative rural isolation and tranquillity of grade I The Point in View chapel (associated with Grade I A La Ronde cottage further west), adjacent grade I Manse and surrounding grade II Registered Park and Garden, contribute to the significance of these assets as an ornamental farm and religious complex within a wider pastoral setting. Site Exmo_47 forms part of a green buffer between this group of assets and the residential development to the east, which helps to maintain these qualities. Development would therefore result in harm to the significance that these assets derive from their settings.	<p>Hulham Road currently provides a strong eastern boundary to the remaining pastoral landscape around the group of heritage assets at A La Ronde. We recommend that this is maintained by removing Exmo_47 from the Plan.</p> <p>If the site is nevertheless to be considered for allocation, then the site capacity should be reconsidered on the basis of a more detailed understanding of potential impacts on the settings of heritage assets, and how this could be minimised and mitigated. This should accompany and inform a concept</p>

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			Bearing in mind the limited contribution of the site to meeting East Devon's housing need, we question whether the proposed site allocation is justified and consistent with national policy. Furthermore, the proposed capacity of 15 dwellings appears too much to be supported by the site, when considering the need to restrict development to the southerly parts of the site (as specified by the policy) and provide access and gardens etc.	plan showing how any proposed development and mitigation would be located within the site. An associated policy would then need to incorporate these provisions, such as controls on development siting, height, materials and landscaping.
	Land at St John's (Exmo_20)	Unsound	<p>Exmo_20 currently covers a very large area to the east and northeast of Exmouth. Much of this falls within the setting of the grade II* listed Church of St John the Wilderness and its churchyard. Development could result in considerable harm to the setting of this building, which the NPPF identifies as an asset of the highest significance (paragraph 206(b)). Development may also result in some harm to the setting of the nearby grade II listed buildings Withycombe Barton (a mid-late 19th Century house) and Higher Lodge (an early 19th Century Cottage ornee).</p> <p>The church and its grounds enjoy a scenic and tranquil setting and extensive views across the surrounding pastoral landscape. The churchyard is enclosed by rising land in a broad arc from north to south, with land to the east forming a highly sensitive part of the setting. We are therefore in general agreement with the policy statement that 'development will need to be concentrated in the southern parts of the site'. However, restrictions on development in the setting of the church need to be more clearly defined.</p> <p>It appears that at modest densities it may be possible to accommodate the stated residential site capacity within less sensitive field parcels, entirely to the south of the church, between the water courses and areas of</p>	<p>Exmo_20 needs to be informed by a more detailed understanding of potential impacts on the settings of heritage assets, and how this could be minimised and mitigated. This should accompany and inform a concept masterplan showing how any proposed development and mitigation would be located within the site.</p> <p>Should this evidence demonstrate that the proposed development can be accommodated in less sensitive areas to the south, then the site boundary should be amended accordingly. If this is not possible then the range and quantum of proposed uses should be restricted to those which can be justified.</p> <p>Other options for site access should be explored. For example, could access be gained via a new road passing through Exmo_18 (Land east of Liverton Business Park) to the south?</p>

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			<p>plantation woodland. If adding further employment development to the mix would result in harm, then we question whether it can be justified on this site bearing in mind the significant oversupply of employment land proposed by the plan as a whole.</p> <p>Finally, we are concerned by the proposal to bring a long access road from the B3179 to the north. This could itself result in significant harm to the setting, while opening up the area to future pressure for development and associated harm. It is unclear whether this is the sole reason for including a large swathe of land to the north and east of the church within the site? Alternative access to the south of the site should be explored.</p> <p>Consequently, in its current form we consider Exmo_20 fails the NPPF tests of soundness as it is unjustified and inconsistent with national policy, including paragraph NPPF 16(d) and policies in Chapter 16.</p>	Overall, there needs to be greater clarity and assurance of the areas of the historic setting to be protected.
	Land to the South of Littleham (Exmo_17)	Unsound – adjustment requested	<p>Exmo_17 covers a large area located to the east of Littleham, with a cycle path (former railway) bisecting the landscape from east to west. Land to the south includes several fields and wooded water courses, which form a rural setting to the east of grade II* listed Parish Church of St Margaret and St Andrew within its churchyard – a heritage asset of the highest significance according to the NPPF. The southernmost field parcel adjacent to the church forms a particularly sensitive part of the setting. Any built development here has potential to result in considerable harm. This is acknowledged by the site selection report, which identifies a ‘major’ impact from development to the south, lessening to the north. Development may also result in some harm to the grade II lychgate and grade II Castle Cottages located further east.</p>	<p>Notwithstanding impacts on the National Landscape which will also require careful consideration, we request that the boundary of the site allocation is amended to remove the southern field parcel adjacent to the church along with all land south of Littleham Brook. This would also allow the Coastal Preservation Area to be retained over this land, and would negate the need to bridge the brook, which may be costly.</p> <p>We suggest that the policy text is also adjusted as follows:</p>

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			<p>It appears that at modest densities it may be possible to accommodate both the stated residential site capacity and proposed employment uses (if justified) without developing the southern parcel of land adjacent to the church. Furthermore, while we welcome the requirement for a masterplan, the policy would benefit from clear provisions to protect views of and from the church.</p> <p>Consequently, in its current form we consider Exmo_20 fails the NPPF tests of soundness as it is unjustified and inconsistent with national policy including paragraph 16(d) and policies in Chapter 16.</p> <p>We note that the whole site falls within the East Devon National Landscape, and adjacent to the Coastal Preservation Area, the boundary of which is proposed to be redrawn to exclude this development site. These issues will require careful consideration.</p>	<p>“This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The site is located in the East Devon National Landscape and particular sensitivity will need to be taken in respect of design and development approaches to minimise potential for adverse landscape impacts. Southerly parts of the site are particularly sensitive and considerable care will be needed in protecting to conserve and enhance the setting and ambience of St Margaret and St Andrews Church at Littleham, <u>including any important views of or from the church and its churchyard.</u>”</p>
	Littleham Fields (Exmo_08 and Exmo_16 combined)	Unsound	<p>This proposed site allocation is on visually prominent sloping land and would urbanise, and result in significant harm to, the setting of grade II Green Farmhouse in a way that would be difficult to mitigate owing to the topography. We therefore question whether this site is justified and consistent with national policy.</p>	<p>We recommend that the proposed allocation is removed from the plan.</p> <p>Should the site nevertheless be taken forward as a potential site allocation, a more detailed assessment would be needed of the potential impact of the scheme on the setting of Green Farmhouse. This should inform and accompany a concept plan to demonstrate whether the proposed site capacity can be achieved with a layout and landscaping to minimise and mitigate impacts.</p>

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	Exmouth town centre Police Station (Exmo_50)	Unsound – adjustment requested	We consider the reference to ‘skilful design’ unhelpful and suggest that this is replaced with more appropriate policy wording that considers character and responds to heritage policies in the NPPF.	“This site forms an urban redevelopment opportunity that will accommodate a new police station as well as at least 20 new homes, <u>with a design that responds sympathetically to the character and appearance of the conservation area, and conserves and enhances the settings of listed buildings around the site, Provided that it does not compromise the aims of this policy, conserves and</u> though with skilful design, noting the significance heritage interests around the site, a greater number of new homes will be actively encouraged.”
80-83	Strategic Policy SD02: Axminster and its development allocations			
	Land west of Musbury Road (Axmi_01a)	Unsound	While we welcome the reference to the two non-designated WWII pill boxes, the policy fails to acknowledge the close proximity of Newenham Abbey Scheduled Monument, and other archaeologically rich areas associated with a Roman Fort and Roman Road nearby to the east. When taken with other constraints such as flood risk, which isolates the site from the urban edge of Axminster, we query whether this site allocation is justified?	As there is an oversupply of employment land this site should be prioritised for removal from the Plan. If the site is nevertheless progressed as a potential site allocation, the policy would need to be strengthened to ensure that there is adequate consideration of the historic environment and to secure appropriate design.
	Land east of Musbury Road (Axmi_02, Axmi_08 and Axmi_09)	Unsound	Adjacent to Woodbury Lane and surrounded by the proposed allocation on two sides is the Scheduled Monument known as ‘Roman fort and later Romano-British settlement at Woodbury Farm’. This is a heritage asset of the highest significance according to the NPPF. Nearby to the west is the line of a Roman Road known as the Fosse Way (as well as WWII records on the HER). The site assessment report notes that associated archaeology may extend beyond the site, particularly to the west. There is therefore potential for significant	We recommend that this site allocation is removed from the Plan. Otherwise, as this is an area of high archaeological sensitivity, a desk-based assessment and potentially a site evaluation would be needed to justify a site allocation. Please refer to the Plan-making section of our guidance on Planning and Archaeology , in particular from p24.

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			<p>impacts on archaeology, of a magnitude as yet unknown, which the site selection report acknowledges 'may constrain or prohibit any development on parts of the site'.</p> <p>In addition to this, the potential harm to the setting of the asset is considerable. Built development across the site would remove or fundamentally alter the physical and visual relationship between the Scheduled Monument, the route of the nearby Roman Road and the landscape over which the fort would have had surveillance, falling to the River Axe before rising to the hills beyond.</p> <p>This site allocation is therefore unsound as it is not justified (based on proportionate evidence relating to archaeology and setting impacts), it is inconsistent with national policy, and it is not effective as there are questions around deliverability.</p>	A more detailed understanding is also needed of potential impacts on the settings of heritage assets, and whether this could be minimised and mitigated.
	Websters Garage, 9 Lyme Street (Axmi_23)	Adjustment requested	Given the sensitive town centre location including multiple designated heritage assets, an adjustment to the wording of this policy is requested to better align with legislation and national policy.	"Very careful design will be needed to <u>reflect conserve and enhance the character and appearance of the Conservation Area location</u> and the setting of surrounding heritage assets.
83-85	Strategic Policy SD03: Honiton and its development allocations			
	Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12)	Unsound – adjustment requested	<p>Sites Honi_07, Honi_12 and adjacent site allocation Honi_13 surround the grade II* Church of St Michael and All Angels and lych gate, and its associated grounds, on three sides. Its prominent position on higher ground at the edge of the settlement contributes to its significance. Close to the church is the associated grade II listed Former Sextons House. The church is now closed and seeking a new use; it is on the Heritage at Risk Register.</p> <p>Depending on its location and scale there is potential for development of land around the church to result in harm</p>	<p>Amend the policy text as follows:</p> <p>"The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. <u>This should include limits on building heights, retention of field boundaries and creation of landscaping buffers. Land within the northern field parcel should be retained</u></p>

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			<p>to the significance that the church derives from its setting. Please see our separate comments on Honi_13 below, which we recommend should be removed from the Plan. We are also concerned about the potential for built development in Honi_07 to result in considerable harm to the immediate setting of the Lych Gate and Sexton's House, and potentially the church itself. It appears that at modest densities, the land within Honi_12 would be adequate to accommodate the stated residential capacity. We therefore request that clear wording is included in the policy to restrict future use of Honi_07 to open space, and potentially the site access, provided this can be located and designed to limit harmful impacts.</p> <p>Further clarity around key requirements for the remainder of the site (Honi_12) is also needed, consistent with NPPF paragraph 16(d). In particular, limits on building heights to conserve views of the church tower, and retention and strengthening of field boundaries as landscaping buffers.</p> <p>Bearing in mind the closed and 'at risk' status of the church, consideration should be given to ways in which development of the site could assist in securing the future of the church, e.g. as a community asset and through use of developer contributions.</p>	<p><u>as an open green space with no built development, other than potentially a vehicle access, provided that the impacts of this can be appropriately mitigated.</u></p> <p>The policy should require/promote (as appropriate) a linkage between development of the site and securing the future of the church, e.g. through developer contributions.</p>
	Land at Middle Hill, Church Hill (Honi_13)	Unsound	Honi_13 is immediately adjacent to the grade II* Church of St Michael and All Angels with clear intervisibility between the site and the graveyard. Historic England has formerly raised significant concerns about an application for five dwellings on this site. These are set out in our response to application 16/0145/FUL, which was subsequently withdrawn. It now appears that a single storey dwelling has been approved and is being constructed on the site in place of a former outbuilding.	We recommend that Honi_13 is removed from the Plan.

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	Land at Kings Road (Honi_18)	Unsound – adjustment requested	The grade II listed Copper Castle former toll house and associated grade II listed gates form a legible entry point to Honiton. Development should seek to conserve and enhance the significance of these assets consistent with policies in the NPPF. This could be achieved by excluding development from the field parcel between Axminster Road and the drive to Hale Close Farm and ensuring that the proposed junction is carefully located and designed.	Additional text for Honi_18 “Development should conserve the settings of the listed Copper Castle and gates, by keeping the eastern side of Axminster Road clear of built development, and through sensitive siting and design of the proposed access.”
86-87	Strategic Policy SD04: Ottery St Mary and its development allocations			
	Land south of Strawberry Lane (GH/ED/27)	Comment	Consistent with the recommendations of the Site selection report, and as for site Otry_10, should pre-commencement archaeological survey be required at this site?	Consider introducing requirement as per adjacent site Otry_10.
87-89	Strategic Policy SD05: Seaton and its development allocations			
	Land to the south of Harepath Hill (Seat_03)	Comment	Consistent with the recommendations of the Site selection report, should pre-commencement archaeological survey be required at this site?	Consider introducing requirement for pre-commencement archaeological survey
	Land off Harepath Road (Seat_05)	Comment	Consistent with the recommendations of the Site selection report, should pre-commencement archaeological survey be required at this site?	Consider introducing requirement for pre-commencement archaeological survey
	Land west of Axeview Road (Seat_13a)	Unsound	The site is north of, and immediately adjacent to, a sizeable Scheduled Monument: Roman and earlier settlement at Honeyditches – a heritage asset of the highest significance according to the NPPF. The list entry states that the monument survives as below ground remains and slight earthworks which have been recorded by way of excavation and ground survey. Romano-British villas were extensive rural estates and consideration should therefore be given to the potential for associated archaeology to exist within the surrounding areas. Conservation of the remaining rural setting should also be a priority.	We recommend that this site allocation is removed from the Plan. Otherwise, as this site may contain significant archaeology, a desk-based assessment and potentially a site evaluation would be needed to justify a site allocation. Please refer to the Plan-making section of our guidance on Planning and Archaeology , in particular from p24. A more detailed understanding is also needed of potential impacts on the settings

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			<p>The proposed site allocation has the potential to result in considerable harm to the significance of this heritage asset. It would break the clearly defined urban edge of Seaton, projecting out into land adjacent to the Scheduled Monument and impacting on views of the wider landscape. While we recognise that some land to the north contains caravans at present, these have an ephemeral quality in the view and are low rise, such that the landscape beyond remains readily visible. Furthermore, the presence of development that harms the setting does not justify further cumulative harm.</p> <p>As information on the archaeological potential of the land has not been provided in support of the site allocation, it is unclear whether a proposed capacity of 39 dwellings would be achievable.</p> <p>This site allocation is therefore unsound as it is not justified (based on proportionate evidence relating to archaeology and setting impacts), it is inconsistent with national policy, and it is not effective as there are questions around deliverability.</p>	of heritage assets, and whether this could be minimised and mitigated.
90-91	Strategic Policy SD07: Development allocations at Broadclyst			
	Land west of Whimple Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29)	Unsound – adjustment requested	Due to a number of grade II listed buildings and a conservation area in close proximity to the site allocation, we consider it important that development is sympathetic to local character and conserves and enhances the settings of designated heritage assets.	Suggested additional policy text: <u>“Through its layout, design and landscaping, development should respond sympathetically to the rural and historic character of the village, and should conserve and enhance the settings of designated heritage assets.”</u>

92-93	Strategic Policy SD10: Development allocations at Lympstone			
	GH/ED/73 - Land north west of Strawberry Hill, Lympstone	Unsound – adjustment requested	The Site selection report notes the close proximity and potential impacts on two grade II listed assets to the north, including the Gulliford Meeting Burial Ground – a heritage asset for which remoteness and tranquillity are a contributor to significance. We therefore request that the policy responds to address these issues, including by requiring a generous landscaping buffer to the northern boundaries of the site to mitigate impacts on these assets and their rural settings. This will ensure the policy is justified and consistent with national policy.	Suggested additional policy wording “ <u>Development should be appropriate to the rural setting and should conserve and enhance the settings of nearby designated heritage assets, including through a generous landscaping buffer to the northern boundary of the site</u> ”.
93-94	Strategic Policy SD11: Development allocations at Woodbury			
	Land Off Globe Hill, Woodbury (Wood_09)	Unsound – adjustment requested	This site allocation proposal has potential to harm the settings of grade II Oakhayes House, the grade I Church of St Swithun and an open green space that contributes to the character and appearance of the Woodbury Conservation Area. We acknowledge that there is now a resolution to grant outline consent, and we welcome parameters within the policy that respond to both the church and conservation area. However, we consider that development should also seek to conserve the setting of Oakhayes House, consistent with the site selection report and policies in the NPPF.	“Development should include public open space and Green Infrastructure links (including the areas of flood zone 3) through the site to provide opportunities for the public to appreciate a key local landmark (Grade I listed Parish Church of St Swithun) and <u>to conserve the setting of grade II Oakhayes House and the character and appearance of</u> Woodbury Conservation Area.”
	Land at Gilbrook (Wood_10)	Unsound – adjustment requested	This site allocation has potential to harm the settings of grade II listed Gilbrook House to the north and Higher Venmore to the southwest. The policy should include provisions to conserve the settings of these heritage assets, consistent with the site selection report and policies in the NPPF.	“The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north <u>and incorporate landscaping buffers to conserve the settings of grade II listed Gilbrook House and Higher Venmore.</u> ”
	Land south of Broadway (Wood_16)	Comment	Given that this site is also adjacent to the Conservation Area, should it contain the same provision as sites Wood_09 and Wood_10?	“ <u>The design and layout of development should reflect the key characteristics of Woodbury Conservation Area to the north.</u> ”

97-98	Strategic Policy SD17: Development allocations at Exton			
	Land north and east of Exton Farm (Wood_28)	Unsound	<p>The proposed site allocation is located immediately to the east of the farmstead associated with grade II* listed Exton Farmhouse and forms the remaining rural/agricultural setting to this heritage asset (nb. It appears likely that remaining vernacular farm buildings may be considered curtilage listed). Development of the whole site would sever much of the remaining link and would therefore harm the significance that Exton Farmhouse derives from its setting. We note that rising land to the northeast of the farmstead also enjoys views over the Exe Estuary and towards The Belvedere tower (grade II*) at Powderham.</p> <p>As a minimum we would expect development to seek to conserve and enhance the setting of the designated heritage asset through careful consideration of layout, design, building height and landscaping. It may be possible to mitigate impacts by restricting development to the southern part of the site and retaining the northern section as green open space with visual links to the historic farmstead.</p>	We request a more detailed HIA including assessment of the potential for development to impact on the remaining rural setting of grade II* Exton Farmhouse, including views into and out of the historic farmstead from rising land to the northeast, and proposed mitigation measures. This should inform a concept plan to evidence whether the proposed site capacity can be achieved without unacceptable harm to this highly graded heritage asset. The site boundary, capacity and/or policy wording should then be adjusted to reflect this evidence.
98	Strategic Policy SD18: Development allocations at Feniton			
	Land to the south east of Bridge Cottages (Otry_20)	Unsound – adjustment requested	The development has potential to result in harm to the rural settings of several nearby listed buildings. The site selection report fails to acknowledge the intervisibility with grade II listed Sweethams. Nevertheless, we acknowledge the statement that low level development and mitigation could address these concerns and we consider that this should be reflected in the policy, to ensure that it is consistent with both the NPPF and evidence base.	<u>“The development should seek to conserve the rural settings of nearby listed buildings, through careful consideration of building height, design and boundary planting.”</u>
99-100	Strategic Policy SD20: Development allocations at Kilmington			
	Land to the west and south west of the Old Inn (Kilm_10)	Unsound – adjustment requested	We welcome the recognition in policy SD20 that a sensitively designed scheme will be essential to avoid potential adverse impacts on the grade II listed Old Inn.	Remove pub car park from site boundary and amend policy to refer to boundary planting, or insert following text:

			<p>However, at present the site boundary includes the car park to the public house. Loss of the car park would be unacceptable as it would compromise the sustainable future of this historic building, and would therefore be incompatible with NPPF paragraph 196. As the southern part of the site appears adequate to accommodate 5 homes, loss of the pub car park would also be unjustified.</p> <p>To address this issue, we request that either the car park is excluded from the boundary of the site allocation, or that specific provision is made for retention of parking. Boundary planting should also be retained/enhanced on the roadside (consistent with site Kilm_09b), and between the pub and the proposed development site to retain a visual buffer and a sense of enclosure.</p>	<p><u>“The existing car park must be retained for the use of the Old Inn public house, with built development restricted to the southern part of the site. Boundary planting should be retained/enhanced on the northern site boundary (along the A35), and to separate the car park from the southern development area.”</u></p>
100	Strategic Policy SD21: Development allocation at Musbury			
	Land at Baxter’s Farm (Musb_01a)	Unsound – adjustment requested	<p>While we would welcome a sensitive scheme for this site, Policy SD21 needs to be adjusted to respond to the site selection report and ensure that it is consistent with the NPPF.</p>	<p>Suggested additional wording: “A high quality scheme is required at this site which is likely to require some conversions and some new build. <u>Development should conserve and enhance the conservation area, listed buildings and their settings, incorporating the historic farmhouse and vernacular farm buildings (which are considered non-designated heritage assets) into a sympathetically designed scheme.</u>”</p>
101	Strategic Policy SD23: Development allocation at Otterton			
	Land north of Behind Hayes (Otto_01)	Adjustment requested	<p>While the policy for Otto_01 helpfully identifies, and goes some way to addressing, the heritage issues at this site, we consider that it would be helpful if there were greater clarity around some of the key parameters that developers will need to consider.</p>	<p>Suggested adjustment to policy text: “... Development should be very carefully designed to ensure that it is compatible with the National Landscape and adequately mitigates any impact on the surrounding heritage assets <u>through its layout, design, landscaping and limits on</u></p>

				building heights. This should include identification of any key views to be conserved and enhanced. Vehicular access needs to be to the east/Orchard Drive.
102	Strategic Policy SD25: Development allocation at Plymtree			
	Land north of the School (Plym_03)	Unsound – adjustment requested	<p>There are a number of designated heritage assets in close proximity to this site allocation including the grade I listed Church of St John the Baptist – a heritage asset of the highest significance according to the NPPF. Development of Plym_03 could result in considerable harm to this asset by urbanising its setting, eroding the relationship with its wider rural landscape to the northeast, and through impacts on views of or from the church and its grounds.</p> <p>We are aware of a current planning application for 30 dwellings on this site. We have outstanding concerns about this proposal and therefore, while we acknowledge that it may be possible to accommodate some new housing in this location, we suggest that the site capacity is further reduced to mitigate impacts.</p> <p>We request that policy SD25 is amended to better reflect these issues and to improve consistency with both the NPPF and evidence base.</p>	<p>We suggest that the site capacity is reduced, or amended to state “up to 30 new homes” along with the following additional policy text: “This site is particularly sensitive in heritage terms and detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage assets around the site. Careful consideration will need to be given to layout, building heights, design and landscaping. Development should conserve views of and from the grade I listed church and retain an open green space linking the church and its wider rural setting.”</p>
103	Strategic Policy SD26: Development allocation at Sidbury			
	Land south of Furzehill (Sidm_34)	Unsound – adjustment requested	<p>While we do not object in principle to the provision of housing in this location, greater care is needed to identify the potential heritage impacts and to ensure that these will be minimised and mitigated through the policy framework.</p> <p>Most importantly, the policy and evidence do not currently identify Sidbury Castle Scheduled Monument – an Iron Age hill fort of massive proportions, located to the west of the site and overlooking it. While we appreciate that at present there are plantations on much of the eastern flank</p>	<p>“.. The site is within the East Devon National Landscape and particular care will be needed to avoid adverse impacts. It is also located due east of Sidbury Castle, an Iron Age hill fort designated as a Scheduled Monument, the setting of which should be conserved and enhanced, especially on the higher westerly site parts of the site should therefore remain undeveloped and field boundaries should</p>

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			<p>of the monument, there are also clearings that may be expanded in future years.</p> <p>The proposed site allocation would have the effect of connecting a string of housing development to the south of Sidbury. We note that existing development is a more obtrusive presence in the landscape and long views where it occupies an exposed location and employs materials such as white render. Controls on building heights and materials, as well as appropriate landscaping, will therefore be important to ensuring that harm is minimised.</p> <p>The site also encircles grade II listed Furzehill Farmhouse and associated buildings, and forms the rural/agricultural setting on their western side. While the farmstead appears to be somewhat enclosed by vegetation, it would nevertheless be beneficial to retain a linkage between the historic buildings and their rural setting by retaining a broad green corridor between the northern and southern sections of the site.</p>	<p><u>be reinforced with appropriate planting.</u> where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets, <u>and where possible to secure enhancements. This should include controls on building heights and materials, and the retention of a broad green corridor connecting Furzehill Farm with the wider rural setting.</u>”</p>
104-105	Strategic Policy: SD29: Development allocations at Whimble			
	Land at Station Road (Whim_11)	Adjustment requested	We request an adjustment to this policy for clarity and to ensure it is consistent with national policies for the conservation of heritage assets.	“Careful attention should be paid to <u>conserving and enhancing</u> the setting of Slewton House, a Grade II listed building, <u>including through appropriate building heights, layout and landscaping.</u> ”
	Land west of Bramley Gardens (Whim_08a)	Comment	The Historic Environment Record also identifies a structure of unknown date and function within the site that is not discussed by the site assessment report. Should pre-commencement archaeological assessment therefore be specified for site Whim_08?	Consider introducing requirement for pre-commencement archaeological assessment

Chapter 6. Mitigating Climate Change				
108-109	Strategic Policy CC02: Net-zero carbon development	Unsound – adjustment requested	<p>As Policy CC02 applies to conversions, as well as to new build housing, it is important that the policy recognises that buildings of traditional construction (generally those built prior to 1919) perform differently to modern buildings. This may mean that it is not possible or appropriate to retrofit them in the same way, or to apply the same energy efficiency standards. It is not yet known how the Future Buildings and Homes Standard will apply to these buildings.</p> <p>Where a building is also of historic interest, any alterations to the building would need to be balanced with the need to conserve and enhance the significance of the building, in line with national planning policy.</p> <p>Historic England has a range of technical guidance in this area and has recently published a new Advice Note on Adapting Historic Buildings for Energy and Carbon Efficiency.</p>	<p>We request that new provisions are added to the policy to recognise that a different approach may be needed for buildings of traditional construction and for heritage assets.</p> <p>The supporting text could helpfully refer to Historic England guidance for further advice on this topic.</p>
110-111	Strategic Policy CC03: Promoting low carbon and renewable energy	Unsound – adjustment requested	<p>Historic England recognises that climate change is one of the most challenging issues of our time, with potential negative consequences for both people and heritage. While we support the promotion of renewable energy, we have significant concerns regarding the lack of historic environment evidence underpinning the proposed 'Areas Considered Suitable for Wind Energy'.</p> <p>NPPF paragraph 160 states that plans should 'b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development'. However, we note that under the new NPPF decision-making framework introduced in 2024, the fact that suitable areas have not been identified would not prevent schemes from gaining consent. This is because footnote 58 of the NPPF</p>	<p>We request that the proposed suitable areas are removed from the Policies Map and that the policy wording is amended to require robust assessment on a case by case basis of landscape and heritage impacts.</p> <p>The policy could be amended as follows:</p> <p>"A. There are no significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative <u>harm to designated and non-designated heritage assets including from impacts on their</u></p>

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			<p>December 2023, which had the effect of restricting new wind proposals to areas identified as suitable, has been removed.</p> <p>Given that the locations identified in East Devon would require developers to consider schemes on small, discrete areas, not unlike a site allocation, we are concerned that the plan is not accompanied by adequate evidence to demonstrate that these sites are suitable for wind energy. Planning Practice Guidance for Renewable and low carbon energy states that when considering locations, local planning authorities will need to consider (amongst other things) 'the potential impacts on the local environment, including from cumulative impacts'. However, the identified areas in East Devon are not supported by any evidence of potential setting impacts. For example, considering only those locations in the far northwest of the plan area, there appears to be potential for significant adverse impacts on the settings of highly graded assets including grade II* Pynes House and grade II* Poltimore House.</p> <p>The Sustainability Appraisal suggests Policy CC03 would result in positive effects on topics such as landscape and the historic environment. This is likely to be incorrect in a majority of cases.</p>	<p><u>settings, landscape and visual impacts, as well as the character of wider historic townscapes, landscapes and seascapes; protected species and sites of ecological/geological importance;</u>"</p> <p>...</p> <p>"Proposals for wind farms <u>should be accompanied by a Heritage Impact Assessment and a Landscape and Visual Impact Assessment supported by visualisations will only be allowed in defined areas as shown on the Policies Map.</u> Domestic and other small-scale wind turbines will be preferred..."</p>
115-116	Strategic Policy CC06: Embodied carbon	Unsound – adjustment requested	As Policy CC06 suggests circumstances in which an existing buildings may not need to be retained, it is important that the policy or supporting text highlighted that where the building is a heritage asset, national and local policies for the conservation and enhancement of heritage assets will also need to be met.	Add policy or supporting text identifying that when considering heritage assets, heritage policies in the Local Plan and NPPF will also need to be met.
Chapter 7. Adapting to Climate Change				
124-125	Policy AR05: Development affecting coastal erosion	Comment	It would be helpful if the supporting text drew attention to the complementary policy requirements contained in	Add supporting text highlighting that in cases that may affect the World Heritage

			Policy PB10: Protection and enhancement of the Jurassic Coast World Heritage Site.	Site, the specific requirements of Policy PB10 will also apply.
Chapter 8. Meeting Housing Needs				
139-140	Policy HN07: Householder annexes, extensions, alterations or outbuildings outside settlement boundaries	Unsound – adjustment requested	The supporting text to this policy notes the need to maintain the character of existing dwellings, and to respond positively to the ‘context and character’ of existing areas. These important requirements should be part of the policy itself, consistent with policies in Chapters 12 (design) and 16 (heritage) of the NPPF. For example paragraph 135(c) states that planning policies and decisions should ensure that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change..”.	Adjust policy to ensure that proposals respond appropriately to the character of the building and area. A cross reference to heritage policies elsewhere in the Plan would also be helpful, as this will deal with proposals that may impact the significance of heritage assets.
Chapter 9. Supporting the Economy and Town Centres				
160	Policy SE07: Town centre development, sequential approach and impact assessment	Sound	We are supportive of Policy SE07 insofar as it promotes vibrant town centres while protecting historic shop frontages in cases where the ground floor may be converted to another use.	N/A
Chapter 10. High Quality Design				
174-176	Strategic Policy DS01: Design and local distinctiveness	Adjustment requested	Historic England broadly supports Policy DS01 insofar as it relates to our remit. However, part 11 promotes a ‘fabric first approach’ which will not always be appropriate to apply to historic buildings. An adjustment to the text is therefore requested.	Suggested adjustment to policy text: “Measures that minimise risks associated with climate change, including a fabric first approach <u>(or an alternative approach for historic buildings under policy CC02)</u> , the use of appropriate materials, techniques, and technologies to reduce carbon emissions over the lifetime of the development;”
177	Policy DS02: Housing density and efficient use of land	Sound	We support the requirement in Policy DS02 to optimise residential density while conserving and enhancing the character of the area.	N/A

Chapter 12. Our Outstanding Landscape				
196-197	Strategic Policy OL01: Landscape features	Sound	We welcome inclusion of a policy protect the character of rural landscapes.	N/A
199-200	Strategic Policy OL02: National Landscapes (Areas of Outstanding Natural Beauty)	Sound	We welcome the inclusion of a policy to protect National Landscapes including their identified special qualities.	N/A
201-202	Policy OL04: Areas of strategic visual importance	Sound	We welcome Policy OL04 which protects important views of and from heritage assets, amongst other things. These would also be protected for their contribution to the significance of the heritage asset, in line with Historic England's Good Practice Advice in Planning 3: The Setting of Heritage Assets .	It would be helpful for the supporting text to highlight that views relating to heritage assets are also protected for their contribute to the 'significance' of the asset, perhaps with a cross reference to the Plan's heritage policies.
Chapter 13. Our Outstanding Biodiversity and Geodiversity				
236	Policy PB10: Protection and enhancement of the Jurassic Coast World Heritage Site	Adjustment requested	The policy and supporting text should draw the attention of applicants and decision makers to UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context . This should be used to assess any proposals that may impact on the World Heritage Site.	Add text to draw attention to the UNESCO Guidance and Toolkit for Impact Assessments, and to require this to be used in cases affecting the World Heritage Site.
Chapter 14. Open Space and Sports and Recreation				
247-248	Policy OS05: Leisure and recreation developments in the countryside	Comment	It would be helpful if part A also referred to heritage impacts as the East Devon Coast and countryside contain designated and non-designated heritage assets including listed buildings, scheduled monuments and registered parks and gardens.	We suggest that the policy is adjusted as follows: "A. The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature, <u>heritage</u> or landscape policies, nor detract from the amenities of the area"
Chapter 15. Our Outstanding Historic Environment				
251	Strategic Policy HE01: Historic environment	Clarification needed	Historic England supports Strategic Policy HE01. However, there are a number of areas where the policy would benefit from clarification. Firstly, paragraphs 15.8 and 15.9 refer to 'Heritage Impact Assessments', 'Heritage Statements' and 'Impact	"Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's

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			<p>Assessments'. By contrast the policy only requires a description of the 'significance of any heritage assets affected...'. While the policy requirement is not inconsistent with the NPPF, it is common, and helpful, to require applicants to conduct an impact assessment. We therefore suggest that the impact assessments referred to at 15.8 and 15.9 are reflected in the policy and that the supporting text is clarified.</p>	<p>importance. <u>Applications should also assess the impact of proposals on that significance.</u> In some circumstances a planning condition will require further survey, analysis and/or recording." "15.8. Applicants should use resources like the Devon Historic Environment Record and local Heritage Impact Assessments, <u>National Heritage List and Conservation Area Appraisals</u> to understand the significance of affected heritage assets. Proposals should align with the Heritage Strategy and relevant guidance." "15.9. Further surveys and analysis may be required for some applications. Heritage Statements and Impact Assessments should follow best practice and national guidance, such as Historic England's advice notes. <u>Further surveys and analysis may be required for some applications.</u>"</p>
252-253	Policy HE02: Listed buildings	Unsound - clarification needed	<p>While we welcome Policy HE02, as elements of the policy are similar to the text of the NPPF, it is important to avoid any potential policy conflicts that may lead to issues of interpretation. In particular, we think it is important to adjust clause B of the third section of the policy to clarify that the 'public benefits' referred to should be weighed against any identified harm, in accordance with NPPF paragraph 208. The reference to 'setting' in supporting text paragraph 15.12 should also be expanded and clarified.</p>	<p>"B. Identify any demonstrable public benefits <u>that would outweigh any remaining harm or exceptional circumstances</u> in relation to the development proposed;" "The <u>setting of a heritage asset is also protected insofar as it contributes to the significance of the asset. The NPPF defines a setting as the surroundings in which a heritage asset is experienced.</u>"</p>

				Occasionally, land distant from the building may also be considered part of its setting due to <u>particular visual</u> , historical or functional associations.”
254-255	Policy HE03: Conservation Areas	Sound	Historic England supports Policy HE03	n/a
255-256	Policy HE04: Archaeology and Scheduled Monuments	Clarification needed	While Historic England supports Policy HE04, we suggest that the word ‘exceptional’ is removed from the first sentence of the penultimate paragraph. This is because the requirement for exceptional circumstances will not apply to archaeology of lesser significance, as distinguished by the previous paragraphs.	“In exceptional cases, where harm to or loss of significance to the asset is considered to be justified...”
257-258	Policy HE05: Historic Landscapes, Parks and Gardens	Clarification needed	Historic England supports Policy HE05. However, we suggest that the first sentence is adjusted to refer to historic interest, character <i>and</i> setting. As the penultimate paragraph of the policy duplicates a requirement to describe the significance of affected heritage assets that is also included in Strategic Policy HE01, this paragraph can be removed. Otherwise we suggest that this paragraph is amended to also require an impact assessment, in line with our comments on HE01.	“Proposals should conserve or enhance the special historic interest, character <u>and</u> or setting of a park or garden on the Historic England Register of Historic Parks and Gardens of Special Historic Interest in England.” Remove or amend penultimate paragraph
17. Implementation and monitoring				
265	Monitoring, paragraph 17.2	Comment	We note that rather than including any specific monitoring indicators for heritage, paragraph 17.2 refers in general terms to monitoring of the heritage strategy. We have received a draft of this document and hope to provide comments in due course.	Consider including specific monitoring indicators for heritage such as number of assets on the heritage at risk register, and applications granted contrary to heritage policies.