



Historic England

Planning Policy, East Devon District Council

3 January 2023

Response provided by email:

[PlanningPolicy@eastdevon.gov.uk](mailto:PlanningPolicy@eastdevon.gov.uk)

Dear Sirs,

## East Devon Local Plan 2020 to 2040 (Reg 18) consultation

Thank you for providing Historic England with a further opportunity to consider your emerging Local Plan. I hope this correspondence, and our previous submission of [15 March 2022](#) are useful.

In due course, it will be helpful to appreciate how you have considered these comments within the spirit of paragraph 26 of the NPPF and the need for effective and on-going joint working to ensure a positively prepared and justified Plan. This may in turn inform any future Statement of Common Ground.

The following comments are made within the context of the national planning framework, its associated advice and guidance, and relevant legislation such as the Planning (Listed Buildings and Conservation Areas) Act 1990.

We note, and commend, your appreciation of the value of East Devon's heritage in shaping the Plan's strategy, ambition and portfolio of policies, including those relating directly and indirectly to the historic environment.

### **Chapter 15. Our outstanding historic environment**

This chapter is welcomed, although there may be an opportunity for minor adjustment to enhance clarity and effectiveness. To accord with the national planning framework (Policy 20 (d)), shouldn't these be presented as Strategic Policy?

### **Site allocations**

We note that in the *East Devon Local Plan Site Selection Methodology* (May 2022), the impact on heritage assets and their setting has been considered through a separate **Historic Environment Site Assessment (HESA)**, which reflects Historic England guidance for selecting sites, based around a five-step process of assessment.

Unfortunately, this evidence doesn't appear to be available to consider. We are instead referred to a synopsis of the heritage assessments in the **Site Selection Reports for Tier 1- 4 Settlements**. Whilst these summaries are helpful, and in most respects this is a reasonable and proportionate level of evidence sharing, in those cases (highlighted below) where there will clearly be an impact on the significance of designated heritage assets, and their setting, then we need to see the HESA and its 5 step heritage assessment that you have undertaken (the evidence base) in full to appreciate how you have come to your conclusions. We need to see what is the relevant significance of affected assets in relation to the proposal; how that significance of the affected assets, and their setting, has



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been considered; how 'great weight' to their conservation (protection and enhancement) has been applied; and how development should respond to that significance to avoid harm. Hopefully the HESA has annotated maps/illustrations.

Without access to such evidence we are unable to appreciate how the heritage conclusions have been derived. For example in relation to the proposed allocation at **Brcl\_12, land west of Whimple Road, Broadclyst**, the summary of the heritage assessment describes the impact as "Overall, moderate - Change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed". Does this mean that the harm to the affected heritage assets will be significant and therefore the site should not be allocated? Are there measures that would minimise harm, optimise improvements? At present the evidence presented is insufficient to help come to an informed conclusion.

Further to our initial assessment of your proposed sites it would be helpful to see the full HESA of the following 34 proposed allocations to enable one to determine whether it can be reasonably demonstrated that they are likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

**Axminster** 01, 08, 09, 82, 83 (82, and 83 appear particularly challenging mindful that you, and the SA, consider development would cause considerable harm to the significance of the Weycroft heritage assets; which questions their suitability in principle).

**Exmouth** 08 (rising land and impact on LB setting), 17 (setting of II\* church; concern), 20.

**Lympstone** 07, 08, 10.

**Honiton** 05 (it would be interesting to appreciate why you consider this would be unacceptable for heritage reasons), 07, 13 (potential impact on grade II\* church)

**Ottery St Mary** 27, 29

**Seaton** 03, 05

**Sidmouth** 06 (setting of Sidbury Castle and LBs), 17

**Broadclyst** 12, 29 (inc setting of Lake House)

**Budleigh Salterton** 02, 03 (key views from principle elevation of Tidwell grade II\* house)

**Lympstone** 72 (setting of Nutwell Court and registered park)

**Woodbury** 10, 16 (CA and LB setting)

**Broadhembury** 09 (impact on Grade 1 LB)

**Kilmington** 11 (proximity of II\* church)

**Musbury** 01 (opportunity for retention of farmstead buildings that contribute to the character and appearance of the CA)



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**Offerton** 01, 02 (you acknowledge that further assessment is required. It will be helpful to consider this when available)

**Sidbury** 34 (setting of scheduled monument and LB)

**Whimble** 11 (you acknowledge that further assessment is required. It will be helpful to consider this when available)

### **Strategic Policy – Development of a second new town east of Exeter**

You accept that all 3 options would have an effect on the significance of certain designated heritage assets, and the envisaged level of change will no doubt considerably alter their wider setting and one's experience of the rural landscape. Nevertheless, you consider that with further assessment and master planning, there is scope to minimise that impact, and we assume, take the opportunity where appropriate to improve matters. We look forward to such further information/evidence during the preparation of this Plan.

We also anticipate that you will include, within the policy, key design principles to ensure development positively responds to historic landscape character, heritage assets and their settings.

### **Strategic policy – High quality employment north of Sowton village**

The Sustainability Appraisal indicates that a proposed allocation would have an impact on the adjacent heritage assets including the Sowton Conservation Area. It would be helpful to appreciate whether a Heritage Impact Assessment has been undertaken to inform the principle, location and form of development.

### **Illustrating a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.**

The preparation of the Local Plan involves more than just allocating sites; it can, and should, also set out how it will consider and positively respond to the heritage challenges and opportunities faced by East Devon's historic towns and villages, landscapes and townscapes, and their relative condition (NPPF para 190). In June 2021 we were pleased to receive notification of your intention to produce a Heritage Topic Paper as evidence to accompany and inform the Local Plan's preparation. We look forward to seeing this in due course.

I hope that our response has been helpful. We wish you well with your on-going work and look forward to further involvement and appreciating how our comments have been considered.

Yours sincerely

Rohan Torkildsen BaHons DipUD MRTPI  
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