

By email:

East Devon District Council, Planning Policy  
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Date: 02/01/2026

Dear Sir/Madam

### **Consultation on East Devon Heritage Strategy (2024-2042)**

Thank you for consulting Historic England on East Devon's second Heritage Strategy. 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 at all stages and levels of the planning process. We offer the following advice on the emerging strategy.

Please note that these comments are provided without prejudice to our response to the ongoing second Regulation 19 consultation on East Devon's Local Plan.

#### **Overview**

We very much support East Devon District Council in employing a Heritage Strategy to provide an overview of the rich heritage of the district, along with tangible actions to secure the benefits that heritage can bring to local communities, place shaping and regeneration. Overall, the Strategy appears to represent a positive approach, and builds on the success of the previous iteration, where many of the original actions have already delivered a solid foundation for the new strategy to build upon. The three overarching themes continue to be a helpful way to frame the Strategy and facilitate the discharge of the authority's various legal and policy obligations. However, there are a number of areas the Strategy would benefit from updates and corrections which we have outlined below. Our comments are provided against the sections and paragraphs of the Strategy to best assist you in adjusting the document.

We are pleased to see that the innovative approach of engaging the community, to help co-deliver the authority's programme of work, is continued from the previous Strategy. It is also good to hear that a cohort of community volunteers have been trained to support the Council in undertaking appraisals and other forms of assessments, including the review of your conservation areas, by capitalising on neighbourhood plan communities.

Historic England has previously provided comments on an early draft and we are pleased to note that those comments have led to a number of adjustments to the full consultation draft.

## Introduction to Heritage Strategy

Section	Comment
1.2 What is heritage? P2	While we note that the NPPF definition of the historic environment is provided on p17, it may nevertheless be helpful to state here that: <i>The government's NPPF defines the 'historic environment' for planning purposes.</i>
Footnotes 1 and 2, p3	The current NPPF is prepared by the Ministry for Housing, Communities and Local Government (MHCLG) rather than DLUHC.
1.17 onwards, p4	We welcome the commitment to the participation of local communities in understanding, enhancing and positively managing heritage. The Council's work to date in prioritising, funding and drawing up templates for reviews of conservation areas is particularly noteworthy.
1.38, p8	We welcome the commitment to maintaining a list of non-designated heritage assets.  Our recent consultation (closed 2 January 2026) on a revised Historic England Advice Note 7 (third edition) on local listing, and the subsequent guidance when published, may assist the Council in further refining its procedures: <a href="https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/">https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/</a>
1.53, role of Historic England, p11	Historic England has a broader role in relation to the historic environment than that stated in the draft Strategy, although it is often necessary to prioritise our involvement.  We therefore suggest a new introductory sentence to paragraph 1.53 as follows:  <i>Historic England is the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, see: <a href="https://historicengland.org.uk/about/what-we-do/">https://historicengland.org.uk/about/what-we-do/</a></i>  The subsequent paragraph could then be amended as follows: <i>The role of Historic England includes advising government on...</i>

	We also think it is important to highlight that: <i>Historic England has a formal role in the planning process, including being a consultee on Local Plans and on certain applications for planning permission and listed building consent.</i>
1.67, NPPF, p14	As the NPPF is currently undergoing a significant review, it would be helpful to highlight here that the NPPF is periodically updated and that it is important to refer to the latest version when drawing up proposals.
Footnotes 10 and 11, p14	These should again refer to MHCLG rather than DLHUC
Legislative Framework, p14	We suggest that this section is reviewed to incorporate recent Acts of parliament introducing new provisions for the historic environment, some of which have not yet been brought into force. For example, the Levelling Up and Regeneration Act.

## Section 2: Heritage Themes

### Theme A - Understanding and appreciating our historic environment

Overall it seems that the first theme has been thoroughly explored, and the understanding and dissemination of the local heritage appears to be the focus of the authority's ongoing work. We offer the following specific comments:

Section	Comment
2.16, p20	We suggest that the following phrase is adjusted as follows:  <i>The setting of an asset, <u>although not designated in its own right, is also afforded protection when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection.</u></i>
2.17, p20	World Heritage Sites should be added to the list of designated heritage assets.
2.18, p20	We suggest that this is adjusted to say that the most important assets are recognised at national <i>or international</i> level.
2.19, p20	It may be helpful to identify here that East Devon's World Heritage Site is inscribed under Criterion viii (natural) 'to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features'.

**Theme B - Positively Managing Our Historic Environment**

<b>Section</b>	<b>Comment</b>
Working with communities, p35	The local authority's innovative strategy to mobilise community volunteers to help with the management of the historic environment is a bold and potentially effective way to respond to current financial strictures. We support East Devon's agenda that maximises community engagement and promotes the community's ownership of their heritage. Clearly there will remain a role for local authority heritage experts and other conservation professionals to guide, review and validate the outputs of this work.
2.76, p36	We note the suggestion that Local Plan site allocations are supported by site assessments to ensure that they do not harm heritage assets. While we would stress that avoiding and minimising harm should be the starting point, unfortunately there are a number of site allocations in the emerging East Devon Local Plan that could result in considerable harm.
2.78 Listed building consent, p37	<p>We suggest that the first sentence of this paragraph is omitted as it is likely to result in confusion, i.e. 'Heritage Assets (Listed Building Consent is something of a misnomer, as it relates to heritage assets and is not restricted to buildings) and their settings are an important element of East Devon's character that the Council wishes to preserve.'</p> <p>We suggest that this is replaced with a sentence summarising when listed building consent is required under the Act, i.e. for works to demolish, alter or extend a listed building in a way that would affect its character or appearance as a building of special architectural or historic interest.</p> <p><a href="https://historicengland.org.uk/advice/planning/consents/lbc/">https://historicengland.org.uk/advice/planning/consents/lbc/</a></p>
2.87 Protecting scheduled monuments, p38	We suggest that this section is adjusted to state that applications for Scheduled Monument Consent are made to the Secretary of State for Culture, Media and Sport and that the consenting process is administered by Historic England.
Local list of undesignated assets, p39	<p>We welcome the Council's commitment to maintaining a list of non-designated heritage assets.</p> <p>Our recent consultation (closed 2 January 2026) on a revised Historic England Advice Note 7 (third edition) on local listing, and the subsequent guidance when published, may assist the Council in further refining its procedures:</p> <p><a href="https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/">https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/</a></p>

2.94, 2.95, Tables 3 and 4, 2.97, Heritage assets at risk, p39-41	Note that the Heritage at Risk Register 2025 is now available and would assist the Council in updating this section. <a href="https://historicengland.org.uk/listing/heritage-at-risk/findings/">https://historicengland.org.uk/listing/heritage-at-risk/findings/</a>
2.99, Grade II Listed Building Condition Survey, p41	It is not clear whether the grade II listed building condition survey training/support referred to here is a current programme. We suggest that this section is reviewed and if necessary updated.
2.111, Reviewing conservation areas, p43	We welcome the commitment to a programme of review of Conservation Areas as it appears from the preceding paragraph that many have not been updated for 15-20 years.
2.118, p44	Chapter 12 of the NPPF Achieving well-designed places, paragraphs 133-134, promotes the use of design guides and codes to provide a 'local framework for creating beautiful and distinctive places'.  We therefore suggest that the Council reconsiders its decision not to prepare an East Devon Design Guide (or guides and codes for local areas). National guidance does not provide the level of local nuance and specificity that is desirable to steer development and provide clarity to developers on the local context and design preferences.

### Theme C – Enhancing And Benefiting From Our Heritage

We welcome much of the content of Theme C, which offers a broad and helpful guide to a range of measures that may be undertaken to heritage assets to harness their benefits to the environment and society, including the sensitive retrofit of historic buildings. The identification of potential benefits of linking heritage enhancements with policy areas such as economic development and regeneration is also helpful.

Section	Comment
2.158 Design and the built heritage, p54	As stated above, Chapter 12 of the NPPF promotes the use of design guides and codes to provide a 'local framework for creating beautiful and distinctive places'.  We therefore suggest that the Council reconsiders its decision not to prepare an East Devon Design Guide (or guides and codes for local areas).
Case studies from p55	It appears that the Heritage at Risk case studies from p55 need to be updated to outline the current status of these assets. For example, Dunkeswell Abbey is described as being at risk with future actions for 2018-19 being discussed. However, the site was removed from the Heritage at Risk Register in 2021.

2.175 Training and capacity building, p57	We suggest that this section is reviewed and where necessary updated having regard to the assessment tools outlined here: <a href="https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/information-sources/">https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/information-sources/</a>
Town centres and high streets, p61	It may be helpful here to identify more recent initiatives and evaluations such as the High Streets Heritage Action Zones <a href="https://historicengland.org.uk/whats-new/news/heritage-regeneration-value-revealed/">https://historicengland.org.uk/whats-new/news/heritage-regeneration-value-revealed/</a>
2.200-2.202 Sources of funding, Historic England, p63	We suggest that this section is reviewed and where necessary updated to reflect Historic England's current approach to funding which has recently been reviewed. See: <a href="https://historicengland.org.uk/advice/grants/">https://historicengland.org.uk/advice/grants/</a>

## Conclusion

Thanks again for consulting Historic England on this revised Heritage Strategy. If you have any questions or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

  
Historic England  
