



**Devon**  
Wildlife Trust

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6 January 2026

Planning Policy Team  
East Devon District Council

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

Dear Sir/Madam,

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

Please find attached comments in relation to biodiversity in the context of the above strategy. A summary of relevant planning guidance is provided in Appendix A.

Yours sincerely,

Devon Wildlife Trust  
[planning@devonwildlifetrust.org](mailto:planning@devonwildlifetrust.org)

Devon Wildlife Trust provides comments or objections to planning applications focused on biodiversity or environmental issues only. Devon Wildlife Trust does not withdraw objections once remedial action has been carried out. Whilst we are happy to be reconsulted for any further comments, it is for the Local Planning Authority to determine if objections have been satisfactorily addressed.

[devonwildlifetrust.org](http://devonwildlifetrust.org)



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Ref	Comment	Information/Action required
<b>1.</b>	<b>National and International Biodiversity and Geodiversity Designations</b>	
	<p>Within this section, the strategy states:</p> <p><i>Special areas of conservation: These are strictly protected sites designated under the EC Habitats Directive relating to species other than birds.</i></p> <p>This statement is incomplete. Special Areas of Conservations (SAC) are also designated to protect habitats.</p>	<p>Text should be rephrased to state '<i>Special Areas of Conservation are highly protected sites designated under the EU Habitats Directive to conserve important natural habitats and species other than birds.</i>'</p>
<b>2.</b>	<b>Theme A Summary</b>	
	<p>Reference to national and international biodiversity and geodiversity designations is made in the document in the form of bullet points. This is followed by '<i>Theme A Summary</i>'. However, no explicit reference to wildlife or biodiversity is included within this section. Sites designated for wildlife, biodiversity and ecological enhancement should be explicitly embedded into Theme A Objectives and Actions, rather than limiting consideration to background contextual information. Ideally, this would be achieved through the inclusion of an additional objective which states:</p> <p><i>'To conserve, enhance and integrate biodiversity and ecological networks within heritage assets and their settings'</i></p> <p>If the inclusion of a new objective is not considered appropriate, a new action should be included within Objective 1:</p> <p><i>'Conserve, enhance and integrate biodiversity and ecological networks within heritage assets and their settings through informed management and guidance'</i></p> <p>Limiting reference to ecological designations alone is a reactive and compliance-led approach. The strategy does not currently recognise that species and habitats are frequently associated with heritage assets, for example bat roosts within historic buildings, veteran trees and traditional grasslands. These features are integral components of the cultural significance and character of heritage assets and their settings. The inclusion of reference to biodiversity within Objectives and Actions would demonstrate strategic alignment with nature recovery agendas and supports integrated landscape-scale conservation. The reflects modern best practice in heritage management.</p>	<p>Amend <i>Theme A Summary</i> to include consideration of biodiversity.</p>
<b>3.</b>	<b>General Comments</b>	
3a.	<p>One of the stated aims of the Strategy is to '<i>involve the community and develop partnerships to make the most of the social, economic and environmental benefits that heritage can bring</i>', however, this aim is not clearly supported by corresponding Objectives and Actions that deliver environmental outcomes. While the Objectives and Actions effectively support social and educational benefits, they do not explicitly reference biodiversity, habitat management ecological enhancement or nature recovery.</p> <p>Overall, the Strategy presents an opportunity to more fully integrate biodiversity considerations into heritage management. Addressing the point above would strengthen the document, reduce ecological risk and ensure that heritage assets contribute positively to nature recovery and integrated, landscape-scale conservation over the lifetime of the Strategy</p>	<p>Include explicit reference to biodiversity, habitat management, ecological enhancement and nature recovery throughout the document.</p>
3b.	<p>References to County Wildlife Sites within the document are not consistently capitalised. As County Wildlife Sites is a defined non-statutory designation, consistent use of capitalisation would improve clarity and accuracy and help distinguish designated sites from general references to wildlife sites.</p>	<p>Updated reference to County Wildlife Sites, using capitalisation throughout.</p>

## **Appendix A: Summary of Legislation & Planning Guidance**

### **NPPF para. 174**

*"Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"*