



Historic England

Forward Planning  
Mid Devon District Council

Our refs: PL00763922  
& PL00763944

*By email*

28 March 2022

Dear Sir or Madam

**Plan Mid Devon 22023-2043: Regulation 18 Issues Consultation and Sustainability Appraisal/Strategic Environment Assessment Scoping Report**

Thank you for consulting Historic England on the Plan Mid Devon 2023-2043: Regulation 18 Issues Consultation (2022) and Sustainability Appraisal (SA)/Strategic Environment Assessment (SEA) Scoping Report (2022).

As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the conservation, enhancement and enjoyment of the historic environment is taken into account at all stages and levels of the development planning process, given that heritage assets are an irreplaceable resource. This reflects national policy as set out in chapter 16 of the National Planning Policy Framework (NPPF) 2021, which requires heritage assets to be conserved in a manner appropriate to their significance and enjoyed for the benefit of existing and future generations.

Our response to this consultation has been informed by legislation, NPPF 2021 and relevant advice in:

- [GPA1: The Historic Environment in Local Plans](#) (2015);
- [HEAN 3: Site Allocations](#) (2015);
- [GPA3: The Setting of Heritage Assets](#) (2017); and
- [HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment](#) (2016).

It also takes into account our past involvement in plan-making and development advice in Mid Devon.



## Plan Mid Devon: Issues Paper (2022)

Mid Devon District Council is to be congratulated for preparing a comprehensive and user-friendly issues paper. We are pleased to see that protecting and enhancing Mid Devon's fine historic environment forms part of the top priorities for the new Local Plan. We also welcome the start of what will be the new Local Plan's positive strategy for the conservation and enjoyment of Mid Devon's distinctive heritage assets and varied townscape and rural landscape character, bearing in mind paragraphs 189 and 190 of the NPPF 2021.

Our detailed comments on the issues paper can be found in Appendix A to this letter. We would like to draw your particular attention to three matters raised in our detailed comments as follows:

- **Heritage Topic Paper:** we strongly recommend the preparation of a Heritage Topic Paper to set out:
  - key issues in terms of understanding, conserving, enhancing and enjoying Mid Devon's historic environment and the wider benefits that this can bring;
  - interrelationships between heritage assets, local character and distinctiveness and other key policy issues such as climate change, place-making/shaping and regeneration, and the natural environment;
  - how effective the adopted Local Plan has been at addressing these issues;
  - existing historic environment evidence base and the need for new evidence for support and justify the spatial strategy, policies and allocations in the new Local Plan;
  - likely impacts of the different options under consideration;
  - how the new Local Plan intends to positively respond to these issues across Mid Devon taking into account the NPPF and heritage legislative requirements.
- **Historic environment evidence base for route, site and allocation selections:** we strongly recommend that the Council undertakes heritage impact assessment (HIA) early in the plan-making process, as a first step to informing route, site and allocation selections, bearing in mind paragraphs 31, 35, 189 and 190 of the NPPF 2021.
- **Heritage strategy:** it may be useful to bring together all of the Council's projects and activities related to understanding, conserving, enhancing and enjoying the historic environment into a Mid Devon Heritage Strategy. This could include those actions related to the preparation of the new Local Plan as well as those that are complementary to this.



## SA/SEA Scoping Report (2022)

Historic England has considered the SA/SEA Scoping Report (2022) for the new Local Plan in light of paragraph 32 of the NPPF 2021 and [HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment](#) (2016).

Section 2 provides a review of **relevant plans, programmes and strategies**, supplemented by a table in Appendix 3. Paragraph 2.4 considers the natural and historic built environment, and respecting environmental limits; however it does not really address this historic environment and neither does the relevant part of Appendix 3. At international level, there are the conventions for landscape, architectural heritage and archaeological heritage. At national level, the Planning (Listed Buildings and Conservation Areas) 1990 and Ancient Monuments and Archaeological Areas Act 1979 are key. There are also many Council plans and policies that have not been acknowledged, including the adopted Local Plan, made and emerging Neighbourhood Plans, and adopted conservation area character appraisals and management plans for example. HEAN 8 contains examples at international, national and local levels that may assist.

We also note that some of the heritage content is out-of-date. The National Heritage Protection Plan (2012) was superseded by the [Heritage 2020 Framework](#) and now by the [Strategic Framework for Collaborative Action 2020-25](#) led by the Historic Environment Forum. The DCMS Heritage Statement (2017) was updated in [2018](#).

**Baseline information** is considered in section 3 and we are pleased to see the descriptions of Mid Devon's heritage assets (3.12-3.3.13). We would, however, urge some caution around stating a definitive number of non-designated heritage assets in 3.12 – has this maybe been confused with assets on the Council's [Local Heritage Assets Register](#)? We also wonder if the Devon Historic Environment Record (HER) also been consulted as a key source of baseline information, given paragraph 192 of the NPPF 2021?

We welcome mention of assets that are on Historic England's [Heritage at Risk Register 2021](#). However, the issues paper discusses other heritage assets and areas of the District where there are particular issues and sensitivities to development for the new Local Plan to address. These include the three main town centres, including providing a legacy for the Cullompton High Street Heritage Action Zone (HSHAZ); preventing and addressing underutilised, redundant and at risk historic farmsteads and farm buildings; and conserving the settings Grand Western Canal Conservation Area and heritage assets associated with Knighthayes Court. The settings of the Exmoor and Dartmoor National Parks can be added to this.

Examination of local plans and policies, including Neighbourhood Plans, conservation area character appraisals and management plans, and other supplementary planning documents may reveal other assets or locations where there are significant challenges or sensitivities, which will need to inform the approach of the new Local Plan.



At 3.13, we are concerned to see the discussion of potential conflicts between protecting heritage assets, mitigating climate change impacts and sustainability objectives. This text does not consider the important, positive contribution that the historic environment can make to [climate change mitigation and adaptation](#), especially through the retention, repair, retrofitting and reusing historic buildings in reducing greenhouse gas emissions. We believe that the goals of protecting heritage, addressing climate change and achieving sustainability are compatible. There is a wealth of information on our [website](#) to help with this, while improving energy efficiency and generating renewable energy.

Given this, we would welcome some more nuanced discussion of how the potential for any negative impacts can be avoided, minimised and mitigated in the new Local Plan, supported by supplementary planning documents and signposts to information and advice as necessary. Perhaps this could be done in section 4, which considers **likely future changes without implementation** of the new Local Plan?

**Key sustainability issues and challenges** for the new Local Plan are summarised in section 5. We broadly agree with these and welcome the inclusion of climate change; impacts on the built environment from development; rich historic environment with some heritage assets at risk; and town centre challenges. While we are pleased to see the need to consider climate change and historic environment, we do not agree it being described as a ‘conflict’ – see above. You have already identified in the issues paper that the settings of the Grand Western Canal Conservation Area and heritage assets associated with Knighthayes Court need special consideration in the new Local Plan. There may be other locations and/or assets that warrant including when you have considered all relevant baseline historic environment information. Your local authority conservation and archaeology advisers can also assist with this.

Section 6 sets out the **SA/SEA Framework** to be used to assess the sustainability effects of the new Local Plan as it is developed. We welcome the inclusion of Sustainability objective B given the elements it covers. However, we would prefer it to be worded as ‘Conserving and enhancing the historic environment and delivering a quality built environment’ bearing in mind the terms used in the NPPF 2021. We would also like the elements covered to mention non-designated heritage assets, settings, heritage risk, and local character and distinctiveness.

We will wait to see what indicators are proposed in relation to this objective. However, relevant advice is available in HEAN 8 and we also draw your attention to the [Heritage Counts indicator data](#).

**Appendix 4** sets out site appraisal guidance for use in assessing site options. In relation to sustainability objective B, we have the same comments in respect of the wording of this objective and the elements covered. We consider that the Pre-mitigation column needs further consideration so that it can provide helpful guidance for the assessment of site options. The impact examples should cover all asset types



(including landscape scale and area-based heritage assets), settings, heritage risk as well as the local character and distinctiveness.

Your local authority conservation and archaeology advisers would be well-placed help you address our comments on the SA/SEA Scoping Report.

We would welcome a meeting with the Council to discuss our concerns and comments as a statutory consultee and a prescribed body under the Duty to Co-operate, especially in relation to the Heritage Topic Paper and HIA. This work will also help with later stages of the SA/SEA for the new Local Plan.

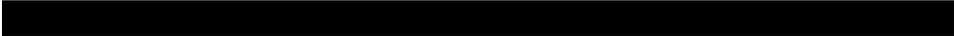
Please do not hesitate to contact me to arrange a suitable time or if I can otherwise be of assistance. We look forward to working with you to help achieve a 'sound' new Local Plan.

Yours faithfully

Rebecca

**Rebecca Harfield**

Historic Environment Planning Adviser (South West)



Historic England, 1<sup>st</sup> Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ  
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## Appendix A: Historic England’s Detailed Comments on the Plan Mid Devon Issues Paper (January 2022)

Section	Support/Object/Comment	Comments
2. Plan Mid Devon sustainable development and six top priorities	Support in part/ Comment	<p>Historic England welcomes the identification of responding to the climate emergency as the overarching top priority for the new Local Plan. <a href="#">Climate change</a> is one of the most significant and fastest growing threats to people and their cultural heritage. Historic England’s <a href="#">website</a> has a wealth of information on how the historic environment can contribute positively to the delivery of this priority. We recently published a <a href="#">Climate Change Strategy</a> (2022). New advice on climate change and the historic environment is anticipated to be produced this year including the role of local plans.</p> <p>We are also pleased to see priority 4: Protecting and enhancing the natural and built environment, and respecting environmental limits. This includes welcome reference to Mid Devon’s many heritage assets and its distinctive urban and rural townscape/landscape character. This reflects chapter 16 of the National Planning Policy Framework (NPPF 2021), especially paragraphs 189 and 190.</p>
3. Our Mid Devon - vision and objectives	Support in part/ Comment	<p>Historic England welcomes the references to addressing climate change and delivering high-quality development in the current Local Plan vision.</p> <p>However, we would like to see the need to conserve, enhance and enjoy Mid Devon’s historic environment within the new vision, bearing in mind the irreplaceable nature of heritage assets and the need for the new Local Plan to set out a positive strategy for the historic environment. This reflects paragraphs 189 and 190 of the NPPF 2021.</p> <p>We also would welcome an associated key objective that includes references to:</p>



Historic England, 1<sup>st</sup> Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ  
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		<ul style="list-style-type: none"> <li>• addressing heritage at risk (Mid Devon has 22 heritage assets on Historic England’s <a href="#">Heritage at Risk Register</a> 2021); and</li> <li>• the positive contribution that heritage assets can make to local character and distinctiveness, place-making/shaping and regeneration, which will build on the Council’s work on the Mid Devon Design Guide SPD (2020) and the design code pilot.</li> </ul>
4. Responding to the climate emergency and moving to net-zero carbon	Support/ Object in part/ Comment	<p>Historic England strongly supports the intent of the new Local Plan to respond to the challenges of climate and biodiversity emergencies. <a href="#">Climate change</a> is one of the most significant and fastest growing threats to people and their cultural heritage. Although responding to climate change requires action, our view is that this does not need to be at the expense of the historic environment.</p> <p>Historic England considers that caring for and learning from the historic environment contributes positively to <a href="#">overall sustainability</a> and can help with <a href="#">climate change mitigation and adaptation</a>. We believe that energy efficiency, sustainable technology and reducing carbon emissions are compatible with the conservation of our heritage.</p> <p>For example, <a href="#">research</a> by Historic England has found that reusing, refurbishing and retrofitting existing buildings should be a priority for meeting the Government’s net zero carbon target by 2050, taking into account their embodied carbon. It concluded that we can reduce the carbon emissions of historic buildings by over 60% by 2050 if we take a whole of life carbon approach. More recent <a href="#">research</a> highlighted that carefully retrofitting historic homes could reduce carbon emissions by up to 84% and the power of small repairs, maintenance and behavioural changes. This is important as buildings are the third largest producers of carbon emissions in the UK today. Homes</p>



Historic England, 1<sup>st</sup> Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ  
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		<p>alone account for 13% of all the UK's carbon emissions and England has one of the oldest building stocks in Europe, with a fifth of all homes being over a century old.</p> <p>Historic England offers a lot of advice on <a href="#">saving energy</a>, energy efficiency measures and retrofitting in relation to historic and listed buildings in ways that are sympathetic to their fabric and historic character. We also recently published <a href="#">HEAN 14: Energy Efficiency and Traditional Homes</a> (2020).</p> <p>To this end, it is disappointing to see that this issue does not mention the positive contribution that the historic environment can make to tackling climate change, especially the retaining, repairing, retrofitting and reusing historic buildings, bearing in mind NPPF 2021 paragraphs 189 and 190. We would like to see this matter addressed in the new Local Plan and most likely with related supplementary planning document(s).</p> <p>Historic England also offers information and advice on renewable energy generation at <a href="#">micro</a> and <a href="#">commercial scales</a>, including the recently published <a href="#">HEAN 15: Commercial Renewable Energy Development and the Historic Environment</a> (2021). This is intended to help ensure any negative impacts from renewable energy generation projects on the significance and settings of heritage assets are avoided and minimised.</p> <p>We note that the Council is considering policy options for encouraging the provision of renewable and low carbon energy and heat. Options include allocating sites, identifying areas that are broadly suitable and the use of policy criteria (either in addition to suitable areas or on a case-by-case basis).</p>



Historic England, 1<sup>st</sup> Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ  
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		<p>We are keen to ensure that impacts on heritage assets will be considered as part of the evidence base needed to inform this policy approach in addition to historic landscape/townscape character. Please refer to HEAN 15 as this contains advice on the methodology for assessing significance and harm in plan-making for commercial renewable energy development.</p> <p>Please note that Historic England recently published a <a href="#">Climate Change Strategy</a> (2022) and is intending to publish a new draft HEAN on climate change later this year, which should be of assistance for the new Local Plan.</p>
6. Meeting housing needs	Comment	<p>Historic England notes that the Council is undertaking work to understand the availability and suitability of land for residential development of different types. We also note that an Urban Capacity Study is underway to examine opportunities for reusing brownfield land. This work is to be used to inform options for site allocations in the new Local Plan.</p> <p>Historic England would welcome early discussions with the Council about the historic environment evidence needed to support and justify site allocations, bearing in mind paragraphs 31, 35, 189 and 190 of the NPPF 2021. In our view, heritage impact assessment (HIA) should be undertaken to understand the potential impacts (positive and negative) of the site options on Mid Devon's special and unique historic environment.</p> <p>The HIA should consider the suitability and capacity of proposed site allocations for development (and existing allocations if development of greater densities and/or heights are proposed) in relation to the historic environment. It should also recommend measures necessary to avoid, minimise or mitigate harm to</p>



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		<p>the significance and settings of heritage assets and wider historic townscapes and landscapes, as well as measures to maximise enhancements.</p> <p>This work help support and justify site selections and assist in informing the content of associated policies, including site-specific policy criteria or the need for masterplans, by way of example.</p> <p>Further advice is available in <a href="#">GPA1: The Historic Environment in Local Plans (2015)</a>, <a href="#">HEAN 3: Site Allocations (2015)</a>, <a href="#">HEAN 12: Statements of Heritage Significance (2019)</a> and <a href="#">GPA3: The Setting of Heritage Assets (2017)</a>.</p> <p>Historic England has also recently published advice on increasing density in historic environments that may assist you with this work including:</p> <ul style="list-style-type: none"> <li>• <a href="#">Increasing residential density in historic environments (2018)</a></li> <li>• <a href="#">Design in the historic environment: Promoting a Contextual Approach to new Housing in Historic Places (2021)</a>.</li> </ul>
7. Supporting our business and jobs	Support in part/ Comment	<p>Historic England has commented in response to section 6 about the need for historic evidence to inform site selections for allocations. The same comments apply if new employment site allocations are proposed in the new Local Plan.</p> <p>In addition to renewable energy (discussed in response to section 4 so not repeated here), we would also generally support policies that encourage:</p> <ul style="list-style-type: none"> <li>• Farm diversification where this can assist with preventing the decay or loss of historic farmsteads and farm buildings (heritage assets) and associated changes to landscape character. Historic England has</li> </ul>



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		<p>published advice on maintaining, repairing and the adaptive reuse of <a href="#">traditional farm buildings</a>.</p> <ul style="list-style-type: none"> <li>• Refurbishing and retrofitting properties - our website contains a wealth of information on improving the <a href="#">energy efficiency</a> of historic and traditionally constructed buildings, so as to avoid harm to their significance and fabric. See also <a href="#">HEAN 14: Energy Efficiency and Traditional Homes</a> (2020).</li> <li>• Training opportunities, which should also include <a href="#">heritage construction training</a> as these traditional trades and craft skills are in short supply and are at risk of being lost to the detriment of conserving heritage assets. This is also important given that the <a href="#">repair and maintenance</a> of historic and traditionally constructed buildings is an important part of an overall low carbon strategy as this increases their lifespans and the effectiveness of retrofit measures.</li> </ul> <p>These comments illustrate the holistic nature of the historic environment and the many interrelationships it has with other policy issues. Given the irreplaceable nature of heritage assets, it will be important for the new Local Plan to recognise and provide for this, as part of its overall positive strategy for the historic environment (as per NPPF 2021 paragraphs 189 and 190).</p>
8. Infrastructure and how we travel	Comment	<p>The provision of new or improved infrastructure and facilities can have negative impacts on the significance of heritage assets, either directly or indirectly through changes in their settings, or to wider historic townscapes and landscapes. However they can also deliver positive impacts, e.g. the Cullompton town centre relief road is intended to improve the experience of being in this conservation area. Public realm improvements often accompany larger infrastructure and transport projects (or may be undertaken in their own right). If</p>



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		<p>carefully designed, these developments can integrate well with and enhance the historic environment as well as local character and distinctiveness.</p> <p>Where routes and sites for infrastructure and facilities development are intended to be identified or allocated in the new Local Plan, it is important that proportionate heritage impact assessment (HIA) are undertaken, bearing mind paragraphs 31, 35, 189 and 190 of the NPPF 2021. The HIA should assess the impacts on the significance of affected heritage assets, and wider townscapes and landscapes. It should consider how any harm can be avoided, minimised and mitigated, and enhancements maximised, including greater public access and enjoyment to heritage assets. This will also help in drafting associated policies in the new Local Plan, including criteria.</p> <p>However, infrastructure and facilities can be or contain heritage assets, e.g. historic parks and gardens. Growth and development can also place additional demands on heritage assets and contribute to accelerated decay and damage. Given this, we encourage the Council to consider how funding from developer contributions (Community Infrastructure Levy or s.106 agreements) can contribute to the conservation, enhancement, maintenance and management of heritage assets, as part of the overall positive strategy for the conservation and enjoyment of the historic environment as per paragraphs 189 and 190 of the NPPF 2021.</p> <p>Relevant information can be found on our <a href="#">website</a> and guidance can be found in <a href="#">Streets for All (2018)</a> and the <a href="#">South West version (2018)</a>, as well as in <a href="#">GPA3: The Settings of Heritage Assets (2017)</a>.</p>



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9. Our natural environment	Support in part/ Comment	<p><b>Landscape and local green space:</b></p> <p>Historic England welcomes the recognition of the need to conserve Mid Devon’s special landscapes, including the Areas of Outstanding Natural Beauty (AONBs), the settings of the Dartmoor and Exmoor National Parks, Grand Western Canal, and other historic parks and open spaces, in the new Local Plan.</p> <p>It should be noted that there are strong interrelationship between the natural environment and the historic environment, some of which are explored in <a href="#">Heritage and the Environment</a> (2020). Both National Parks and AONBs owe part of their special value to cultural heritage, as can local open spaces. Historic landscapes (and townscape) often forms the settings for individually designated heritage assets. In the case of historic parks and gardens, landscapes can be heritage assets in their own right, e.g. grade II* Knighthayes Court Registered Park and Garden. The Grand Western Canal is also a heritage asset (conservation area).</p> <p>Given the irreplaceable nature of heritage assets, it will be important for the new Local Plan to recognise and provide these interrelationships, as part of its overall positive strategy for the historic environment (as per NPPF 2021 paragraphs 189 and 190).</p> <p>We welcome the proposed update to the Mid Devon Landscape Character Assessment and the intention to use this in the preparation of the new Local Plan. Our website contains a wealth of information on <a href="#">historic characterisation</a> for landscapes and urban areas, which may assist with this work. In our view, this assessment work should be used to inform the HIA work that we consider</p>



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		<p>necessary to support and justify site and allocation selections in the new Local Plan, taking into account paragraphs 31, 35, 189 and 190 of the NPPF.</p> <p>The new Local Plan could also mention the use of Landscape and Visual Impact Assessment as a useful tool that can feed into setting assessments as part of Statements of Heritage Significance (see <a href="#">GPA3: The Setting of Heritage Assets</a> (2017) and <a href="#">HEAN 12: Statements of Heritage Significance</a> (2019)).</p> <p><b>Biodiversity, habitats and trees:</b></p> <p>Historic England welcomes the references to some of the interrelationships between trees and hedgerows, and the historic environment (e.g. to conservation areas) in the issues paper, as well as recognition of how Local Plan policy and supplementary planning documents help prevent their loss and guide new works.</p> <p>We note that the new Local Plan intends to have policy to help delivery biodiversity net gains with preference for on-site delivery. We also note the intention to find land for the delivery of strategic habitat creation or enhancement, increase tree and woodland planting, create habitats for carbon sequestration, biodiversity and other purposes.</p> <p>Proposals for the restoration, enhancement, mitigation, compensation and/or off-setting for biodiversity can have negative and positive impacts on the significance of heritage assets, including their settings, as well as on wider historic landscapes. Given the irreplaceable nature of heritage assets (see NPPF 2021 paragraph 189), we are concerned to ensure that appropriate consideration is given to avoiding and minimising negative impacts on the</p>



Historic England, 1<sup>st</sup> Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ  
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		<p>historic environment in designing and delivering works aimed at conserving and enhancing the natural environment, e.g. biodiversity net gains, habitat creation and tree planting.</p> <p>For example, wetlands can be found in a wide range of places including uplands, lowlands, rivers, peatland and man-made features in designated landscapes and moats. They can contain archaeological, environmental and landscape evidence of the past, and enable research into long-term climate change. Changes to their hydrology have a potential impact on the buried and waterlogged archaeological and palaeoecological resources. This may be positive if the desiccation of sensitive sites or erosion of vulnerable buildings or archaeology is prevented, but in the case of already compromised resources, rewetting may be highly destructive. Programmes of base level recording and on-going monitoring may be needed where proposals affect wetland areas, mires and peat. Peatland restoration may also affect sensitive archaeology. Historic England has recently published <a href="#">Peatlands and the Historic Environment</a> (2022) to provide advice on their importance and protection.</p> <p>With tree planting, care needs to be taken in the choice of places, species and sizes to avoid and/or minimise any negative impacts on the significance of heritage assets, either directly (e.g. damage or destroy buried heritage assets or affect foundations of buildings or other structures) or indirectly (e.g. affect the setting of historic buildings or the character of wider townscapes and landscapes). Careful choices for new tree planting may, however, enhance the setting of a listed building or a part of a registered park and garden, while the reinstatement of historic hedgerows may enhance an historic farmed landscape. Valuable archaeological and palaeoecological information can be gathered in terms of understanding past woodland landscapes and traditional</p>



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		<p>tree planting and management (e.g. coppiced woodland and osier beds) to help make informed decisions about the location and types of plantings.</p> <p>The new Local Plan (and associated SPD) can play a useful role in encouraging synergistic development that not only conserves and enhances heritage assets and their settings, and wider townscape and landscape character, but that also addresses biodiversity and climate change emergencies. The aims for the Grand Western Canal Country Park in the Management Plan illustrate this point.</p> <p>In our view, proportionate heritage impact assessments should be undertaken for all potential sites to identify affected heritage assets and their settings, and to consider how alternative options could first avoid, then minimise and mitigate any negative impacts on their significance. This would help form part of the new Local Plan's positive strategy for the conservation and enjoyment of the historic environment bearing mind paragraphs 189 and 190 of the NPPF 2021.</p> <p><b>Green and blue infrastructure:</b></p> <p>Historic England would also welcome recognition of the interrelationships between the historic environment, and green and blue infrastructure in the new Local Plan. Green and blue infrastructure may be heritage assets, or contain heritage assets or historic landscape features, or form part of their settings.</p> <p>While the creation of new green and blue infrastructure should seek to avoid harm to the significance and settings of heritage assets, it should also be noted that their creation and management may help to conserve heritage assets, such as registered parks and gardens, and archaeological sites, and their settings.</p>



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		<p>Blue and green infrastructure may also offer opportunities for enhancing and improving public access, understanding and enjoyment of heritage assets within them or nearby, e.g. signposting, interpretation. This should also be borne in mind in terms of seeking developer contributions.</p> <p>Historic England is intending to publish a new draft HEAN on climate change that may also be of assistance here.</p>
9 Our historic built environment	Support/Object in part/ Comment	<p><b>Heritage assets:</b></p> <p>Historic England strongly supports the identification of the historic environment a key issue for the new Local Plan. This reflects the fact that heritage assets are an irreplaceable resource and that plans should set out as positive strategy for the conservation and enjoyment of the historic environment (see NPPF 2021 paragraph 189 and 190). NPPF paragraph 8 also states that the protection and enhancement of the historic environment is part of achieving sustainable development with subsequent paragraphs going onto explain how local plans should contain strategic and non-strategic policies for the historic environment. This also takes account of the statutory requirements under the Planning (Listed Buildings and Conservation Areas Act) 1990.</p> <p>There is much to welcome in this section of the issues paper and we are pleased to see the following:</p> <ul style="list-style-type: none"> <li>• recognition of the range of heritage asset types in Mid Devon, although it would be good to see non-designated heritage assets also considered including archaeological potential;</li> </ul>



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		<ul style="list-style-type: none"> <li>• mention of the grade II* Knighthayes Court Registered Park and Garden as needing special consideration in terms of conserving its significance and setting in the new Local Plan;</li> <li>• focus on the Grand Western Canal Conservation Area as needing a sensitivity study and conservation character appraisal update to help conserve and enhance its special interest and setting; and</li> <li>• preparation of the new Cullompton Conservation Area Assessment and Management Plan (2022) and commitment to undertake reviews of existing and prepare new appraisals (presumably as resource allow).</li> </ul> <p>However, there are a number of additional matters that we would have expected to see discussed in the issues paper as part of developing the overall positive strategy for the historic environment in the new Local Plan. These are:</p> <ul style="list-style-type: none"> <li>• Role of the Devon HER in relation to the plan-making and decision-taking (see NPPF paragraphs 192, 193, 194 and 205).</li> <li>• Historic environment evidence for the spatial strategy and key policies in the new Local Plan – you might like to consider preparing a Heritage Topic Paper to form part of the evidence base for the new Local Plan that considers: <ul style="list-style-type: none"> <li>- key issues related to understanding, conserving, enhancing and enjoying Mid Devon’s historic environment and the wider benefits that this can bring;</li> <li>- interrelationships between heritage assets, local character and distinctiveness, and other key policy issues, such as climate change,</li> </ul> </li> </ul>



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		<p>high-quality design, place-making/shaping and heritage-led regeneration;</p> <ul style="list-style-type: none"> <li>- how effective existing plans have been at addressing these issues;</li> <li>- existing historic environment evidence base and the need for new evidence to support and justify the policies and allocations in the new Local Plan;</li> <li>- the likely impacts of different options under consideration;</li> <li>- how the new Local Plan intends to positively respond to these issues across Mid Devon taking into account the NPPF and legislative requirements.</li> </ul> <ul style="list-style-type: none"> <li>• Historic environment evidence base for new routes, sites and allocations <ul style="list-style-type: none"> <li>- we strongly recommend that the Council undertakes heritage impact assessment (HIA) early in the plan-making process as a first step to informing route, site and allocation selections, bearing in mind paragraphs 31, 35, 189 and 190 of the NPPF 2021. The HIA should: <ul style="list-style-type: none"> <li>- consider the suitability and capacity of new sites and allocations for development (or existing allocations if greater densities and/or heights are proposed) in relation to the historic environment; and</li> <li>- recommend measures to avoid, minimise or mitigate harm to the significance and settings of heritage assets and wider historic townscapes and landscapes, and to maximise enhancements.</li> </ul> </li> </ul> </li> </ul> <p>This work will help support and justify route/site selections and assist in informing the content of associated policies, including site-specific policy criteria or the need for masterplans, by way of example. It would build on existing and new baseline information, such as conservation area</p>



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		<p>character appraisals, landscape character assessment, town and village character assessment (2012).</p> <ul style="list-style-type: none"> <li>• Non-designated heritage assets and the Local Heritage Assets Register – consideration of how this Register can be updated and how best to integrate the criteria used to identify locally heritage assets (and other types of non-designated heritage assets) into the new Local Plan as well as the need for associated policy to conserve their significance and their settings. Further guidance can be found in <a href="#">HEAN 7: Local Heritage Listing: Identifying and Conserving Local Heritage</a> (2021).</li> <li>• Heritage at risk – how the new Local Plan will seek to prevent and address heritage at risk, including the conservation areas at risk, potentially alongside other complementary actions.</li> <li>• Legacy for the Cullompton High Street Heritage Action Zone (HSHAZ) – how will the new Local Plan help to provide a legacy for the HSHAZ?</li> <li>• What the relationship of the new Local Plan will be to: <ul style="list-style-type: none"> <li>- neighbourhood plans with heritage policies, e.g. Tiverton, Cullompton, Crediton;</li> <li>- supplementary planning documents, e.g. Mid Devon Design Guide (2020), Tiverton Eastern Urban Extension Masterplan SPD (2014), Northwest Cullompton Urban Extension Masterplan SPD (2016), Solar PV Developments in the Landscape SPD (2016); and</li> </ul> </li> </ul>



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		<ul style="list-style-type: none"> <li>- other guidance, such as conservation area character appraisals and management plans (including the new Cullompton Conservation Area Assessment and Management Plan (2022), and design guidance (windows and doors &amp; roofs and chimneys) and the emerging Mid Devon Shopfront Design Guide.</li> <li>• Developer funding – how funding from developer contributions (Community Infrastructure Levy or s.106 agreements) can contribute to the conservation, enhancement, maintenance and management of heritage assets.</li> <li>• Enhancement schemes – how might these be used to improve Mid Devon’s historic environment as the Council’s website refers to current shop front facelift schemes in Cullompton and Tiverton, and a war memorial project in Angel Hill Tiverton?</li> </ul> <p>You may wish to consider bringing together all of the Council’s projects and activities related to understanding, conserving, enhancing and enjoying the historic environment, including the approach proposed for the new Local Plan and complementary work that sits outside it, into a Mid Devon Heritage Strategy.</p> <p>Historic England would welcome discussions with the Council about the new Local Plan’s positive strategy for the historic environment, its evidence base and the policy for heritage assets.</p> <p>Further information can be found in <a href="#">GPA1: The Historic Environment in Local Plans</a> (2015), <a href="#">HEAN 3: Site Allocations</a> (2015), <a href="#">HEAN 12: Statements of</a></p>



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		<p><a href="#">Heritage Significance</a> (2019) and <a href="#">HEAN 1: Conservation Areas: Designation, Appraisal and Review</a> (February 2019). Historic England has published a draft HEAN on <a href="#">Planning and Archaeology</a>, which should be of assistance.</p>
10. Improving our health and wellbeing	Comment	<p>Historic England would welcome recognition that the historic environment can also make a positive contribution to health and wellbeing. Historic England has published research that demonstrates that interaction with heritage or the historic environment can be a positive factor in supporting individual and community <a href="#">health and wellbeing</a>.</p>
11. How are places look and are used	Support/ Comment	<p>Historic England welcomes discussion of the greater focus on beauty, high-quality development and place-making for the New Local Plan, following changes to the NPPF 2021 and the publications of the National Design Guide and the National Model Design Code. The Council is well-placed to move forward with this agenda, given the recent adoption of the Mid Devon Design Guide and the outputs from the design code pilot programme.</p> <p>The National Design Guide’s ten characteristics of well-designed places include understanding and positively responding to local context, including the significance and settings of heritage assets, landscape character, and local vernacular, character and identity. Given this, and paragraphs 189 and 190 of the NPPF 2021, we are keen to see the new Local Plan acknowledge the interrelationships between the design of buildings, streets and spaces and the historic environment, by focusing on building in context and place-shaping.</p> <p>Historic England also has a wealth of information and advice related to <a href="#">place-making</a>, <a href="#">design in the historic environment</a>, research on the use of <a href="#">design</a></p>



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		<p><a href="#">codes</a>, and <a href="#">Streets for All (2018)</a> and the <a href="#">South West version (2018)</a>, which may assist the Council in relation to this issue.</p> <p>We have also recently published advice on increasing density in historic environments that may also be relevant to this this work including:</p> <ul style="list-style-type: none"> <li>• <a href="#">Design in the historic environment: Promoting a Contextual Approach to new Housing in Historic Places</a> (2021) and <a href="#">case studies</a>;</li> <li>• <a href="#">historic characterisation</a></li> <li>• <a href="#">Increasing residential density in historic environments</a> (2018);</li> <li>• <a href="#">HEAN 4: Tall Buildings</a> (March 2022).</li> </ul>
12. Our towns	Support in part/ Comment	<p><b>Town centres:</b></p> <p>Historic England welcomes the recognition of the challenges facing Mid Devon’s town centres (and historic high streets) and supports the exploration of different policy approaches to maintaining their vitality and viability. We are also pleased to see mention of the historic character of Mid Devon’s town centres. Tiverton, Cullompton and Crediton town centres are in conservation areas and also contain many individually designated heritage assets (primarily listed buildings). We further note that both Cullompton and Tiverton conservation areas are on Historic England’s <a href="#">Heritage at Risk Register</a>.</p> <p>While we are generally supportive of policy approaches that enable town centres to adapt to changing trends and communities’ needs, proposed changes to the planning and management of town centres (e.g. primary shopping areas and frontages, and the use of Article 4 Directions) need to be</p>



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		<p>balanced with conserving the historic character of these places. Advice on this can be found on our <a href="#">website</a>.</p> <p>Given this, we consider that historic environment evidence will be needed to inform decisions about the policy options. For example, could you investigate those particular buildings or parts of the town centre conservation areas where ground floor changes of use to residential would be detrimental to their character and/or sustainability if Article 4 Directions are to be considered? In cases of Cullompton and Tiverton, how would such policy changes affect the issues that contribute to them being at risk and/or help deliver heritage-led regeneration? For Cullompton, how would such changes help or hinder the legacy of the High Street Heritage Action Zone (HSHAZ)?</p> <p>You may also need to consider the combined effects of these changes alongside any proposed or recommended in existing and proposed strategies, policies and plans for these three main centres, including:</p> <ul style="list-style-type: none"> <li>• ‘made’ Cullompton Neighbourhood Plan (2021);</li> <li>• updated and adopted Cullompton Conservation Area Appraisal and Management Plan (2022);</li> <li>• emerging Cullompton Town Centre Masterplan SPD;</li> <li>• adopted Tiverton Conservation Area Appraisal and Management Plan (2005);</li> <li>• emerging Tiverton Neighbourhood Plan (2021);</li> <li>• emerging Tiverton Town Centre Regeneration Masterplan SPD;</li> <li>• adopted Crediton Conservation Appraisal (2003); and</li> <li>• emerging Crediton Neighbourhood Plan (2021).</li> </ul>



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		<p>We welcome the intention to prepare a masterplan for Crediton Town Centre.</p> <p>The outcome of this work may lend itself to updating the Tiverton and Crediton conservation area character appraisals and/or management plans. Further information can be found in <a href="#">HEAN 1: Conservation Areas: Designation, Appraisal and Review</a> (2019).</p> <p>Such an approach to these town centres would help the new Local Plan have a positive strategy for the conservation and enjoyment of the historic environment informed by an appropriate evidence base (see paragraphs 31, 35, 189 and 190 of the NPPF 2021).</p> <p><b>Tiverton, Cullompton &amp; Crediton – growth options:</b></p> <p>For Tiverton, we welcome recognition of the need to conserve the settings and significance of the Grand Western Canal Conservation Area and various heritage assets associated with Knighthayes Court. We look forward to hearing how the new Local Plan intends to do this.</p> <p>Historic England has previously been concerned about the impacts of the growth and expansion of Junction 27 of the M5, Cullompton and Crediton on the historic environment and some associated allocations in the adopted Local Plan. We will be looking for proportionate and up-to-date historic environment evidence (e.g. heritage impact assessment) to inform site selections where there are changes to existing allocations (e.g. increased densities/heights) and proposed new allocations in the new Local Plan, as per paragraphs 31, 35, 189 and 190 of the NPPF 2021.</p>



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		<p>The HIA should consider the suitability and capacity of the site allocations in relation to the historic environment. It should also recommend measures necessary to avoid, minimise or mitigate harm to the significance and settings of heritage assets, and wider historic townscapes and landscapes, and measures to maximise enhancements. This work help support and justify site selections and assist in informing the content of associated policies, including site-specific policy criteria or the need for masterplans, by way of example.</p> <p>Further advice in also available in <a href="#">GPA1: The Historic Environment in Local Plans</a> (2015), <a href="#">HEAN 3: Site Allocations</a> (2015), <a href="#">HEAN 12: Statements of Heritage Significance</a> (2019) and <a href="#">GPA3: The Setting of Heritage Assets</a> (2017). Historic England has also recently published advice on increasing density in historic environments that may assist you with this work including:</p> <ul style="list-style-type: none"> <li>• <a href="#">Increasing residential density in historic environments</a> (2018)</li> <li>• <a href="#">Design in the historic environment: Promoting a Contextual Approach to new Housing in Historic Places</a> (2021).</li> </ul>
13. Our rural areas and villages	Support in part/ Comment	<p><b>Rural vitality:</b></p> <p>Historic England welcomes the intention to continue to have policy in the new Local Plan that seeks to prevent the loss of community facilities. Sometimes these facilities are accommodated within heritage assets and their use positively contributes to the significance of the heritage asset and character of the hamlet, village or wider rural area/landscape. This may be mentioned in conservation area character appraisals, neighbourhood plans or supplementary planning documents.</p>



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		<p><b>Small scale housing potential:</b></p> <p>Historic England note that small scale housing may be allocated within villages and smaller settlements. Historic England had concerns about some existing allocations in more rural parts of Mid Devon. We would welcome early discussions with the Council about the historic environment evidence needed to support and justify site allocations, bearing in mind paragraphs 31, 35, 189 and 190 of the NPPF 2021.</p> <p>In our view, heritage impact assessment (HIA) should be undertaken to understand the potential impacts (positive and negative) of the site options on Mid Devon's special and unique historic environment. The HIA should consider the suitability and capacity of proposed site allocations for development (and existing allocations if development of greater densities and/or heights are proposed) in relation to the historic environment. It should also recommend measures necessary to avoid, minimise or mitigate harm to the significance and settings of heritage assets, and wider historic townscapes and landscapes, as well as measures to maximise enhancements.</p> <p>This work help support and justify site selections and assist in informing the content of associated policies, including site-specific policy criteria or the need for masterplans, by way of example.</p> <p>Further advice in also available in <a href="#">GPA1: The Historic Environment in Local Plans</a> (2015), <a href="#">HEAN 3: Site Allocations</a> (2015), <a href="#">HEAN 12: Statements of Heritage Significance</a> (2019) and <a href="#">GPA3: The Setting of Heritage Assets</a> (2017).</p>



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		<p><b>Rural economy and farm diversification:</b></p> <p>Historic England welcomes consideration of how the rural economy, including farming and farm diversification, the conversion of new existing buildings and new buildings, including associated traffic and pollution, can impact on the significance and settings of heritage assets, traditional landscape features and wider landscape character.</p> <p>Of relevance to this, Historic England has published <a href="#">guidance</a> on how to understand, maintain and convert traditional farm buildings and farmsteads in addition to <a href="#">HEAN 9: The Adaptive Reuse of Traditional Farm Buildings</a> (2017). Our website offers information and advice on caring for <a href="#">rural heritage</a>.</p> <p>Given this, we support the exploration of what types of employment development may be appropriate in rural locations, including the consideration of the cumulative impacts on rural character. In our view, this should also consider the impacts on the historic environment.</p> <p>We consider that some flexibility can help prevent and address heritage at risk, especially for underutilised or redundant historic farm buildings if carefully managed. We would like to see the associated policy incorporate appropriate criteria in respect of impacts on the significance and settings of heritage assets, and historic landscape, to enable that flexibility to be applied appropriately, as part of the new Local Plan's positive strategy for the historic environment (see NPPF 2021 paragraphs 189 and 190).</p> <p>We also welcome the mention of the positive role of <a href="#">grant schemes</a> in helping with land management, including the preservation of heritage assets, and</p>



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		<p>conservation and enhancing landscape character. It is worth noting that Historic England can offer <a href="#">funding</a> to improve the management of scheduled monuments at risk and that we work closely with Natural England on an agri-environmental funding scheme (Environmental Stewardship), which is the primary source of funding for landscape management. The new <a href="#">Environmental Land Management scheme</a> will also offer opportunities for improving heritage. We would be pleased to see the new Local Plan signpost plan readers to grants information like this.</p>
<p>15. Proposals at Junction 27, M5 Motorway</p>	<p>Object in part/ Comment</p>	<p>Historic England raised concerns about development here in the existing Local Plan and whether there was adequate historic environment evidence to support and justify its allocation. Of particular concern to us were the potential impacts on the settings and significance of the grade II Registered Park and Garden of Bridwell, Uffculme Conservation Area and a number of highly graded heritage assets that sit within both designations.</p> <p>We are aware that the Council subsequently undertook a Historic Environment Appraisal of Proposed Allocations (2016) including for this site. This confirmed that development would have a detrimental impact on the setting of the grade II listed Leonard Moor Cottages, some degree of negative impact on the setting of the Registered Park and Garden at Bridwell and limited impact on the settings of the Sampford Peverell and Grand Western Canal Conservation Areas. However, the Appraisal considered it likely that these setting impacts could adequately mitigated with advice on how this might be achieved, as was the case for impacts on assets of archaeological interest. Despite this, Policy J27 in the adopted Local Plan and its supporting text make no reference to the need to conserve affected heritage assets.</p>



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		<p>We note that the new Local Plan offers the opportunity to reconsider this allocation. Assuming some form of allocation is taken forward here, we would like to see updated HIA and the opportunity to revisit the policy criteria and supporting text to ensure they address this matter, bearing in mind paragraphs 31, 35, 189 and 190 of the NPPF 2021.</p>
<p>16. A sustainable distribution of development across Mid Devon</p>	<p>Support in part/ Comment</p>	<p><b>Overall strategy:</b></p> <p>Historic England strongly supports the intention for the overall strategy for the new Local Plan to include the conservation and enhancement of the historic environment including landscapes.</p> <p>This intention is supported by the NPPF 2021. We note that paragraph 8 of the NPPF 2021 states that the protection and enhancement of the historic environment is part of achieving sustainable development with subsequent paragraphs going onto explain how local plans should contain strategic and non-strategic policies for the historic environment. This reflects the fact that heritage assets are an irreplaceable resource and that plans should set out as positive strategy for the conservation and enjoyment of the historic environment (see NPPF 2021 paragraph 189 and 190). This also takes account for the statutory requirements under the Planning (Listed Buildings and Conservation Areas Act) 1990.</p> <p><b>Historic environment evidence for spatial strategy, allocations and settlement limits:</b></p> <p>We welcome that technical evidence is to be prepared to inform the new Local Plan's strategy and we expect this to include historic environment evidence. We</p>



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		<p>have commented in response to other issues on the need for an historic environment evidence base to support and justify allocations and the same applies to the overall spatial strategy and any changes to settlement limits.</p> <p>We will be looking for proportionate and up-to-date historic environment evidence (e.g. heritage impact assessment) to inform changes to the spatial strategy for growth and development, changes to existing allocations (e.g. increased densities/heights) and proposed new allocations, as well as changes to the boundaries of settlement limits in the new Local Plan, as per paragraphs 31, 35, 189 and 190 of the NPPF 2021.</p> <p>The HIA should consider the impacts on the historic environment, including the suitability and capacity of site allocations. It should also recommend measures necessary to avoid, minimise or mitigate harm to the significance and settings of heritage assets, and wider historic townscapes and landscapes, and measures to maximise enhancements.</p> <p>This work will help support and justify preferred policy approaches, site selections and boundary changes. It will also assist in informing the content of associated policies, including site-specific policy criteria or the need for masterplans for allocations, by way of example.</p> <p>Further advice is also available in <a href="#">GPA1: The Historic Environment in Local Plans</a> (2015), <a href="#">HEAN 3: Site Allocations</a> (2015), <a href="#">HEAN 12: Statements of Heritage Significance</a> (2019) and <a href="#">GPA3: The Setting of Heritage Assets</a> (2017). Historic England has also recently published advice on increasing density in historic environments that may assist you with this work including:</p>



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		<ul style="list-style-type: none"> <li>• <a href="#">Increasing residential density in historic environments</a> (2018)</li> <li>• <a href="#">Design in the historic environment: Promoting a Contextual Approach to new Housing in Historic Places</a> (2021).</li> </ul> <p><b>Rural exceptions sites and new homes in the countryside:</b></p> <p>Historic England notes that some housing is allowed on rural exception sites and in other cases, subject to certain criteria. Although this type of development may harm the settings and significance of heritage assets, or historic landscape character, we recognise that this has to be balanced with opportunities to both prevent and address some types of rural heritage at risk, including underutilised or redundant historic farmsteads and farm buildings. We are pleased to see this mentioned in the issues paper.</p> <p>We are, therefore, comfortable with policies in the new Local Plan that allow some flexibility to allow limited residential development in more rural locations, provided this includes criteria to address this matter. This would be part of the new Local Plan’s positive strategy for the historic environment, as per NPPF 2021 paragraphs 189 and 190.</p> <p>Of relevance to this, Historic England has published <a href="#">guidance</a> on how to understand, maintain and convert traditional farm buildings and farmsteads in addition to <a href="#">HEAN 9: The Adaptive Reuse of Traditional Farm Buildings</a> (2017).</p>



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