

Report to: **Strategic Planning Committee**



Date of Meeting: 25 November 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

---

## **Heritage Strategy 2024-2042**

### **Report summary:**

To agree an updated Heritage Strategy for public consultation to run from 2024-2042. This will replace the existing strategy (2018 – 2031). The strategy brings together information on the heritage of East Devon and identifies the issues, challenges and opportunities for the future with a plan of recommended actions. It informs and supports the heritage policies of the new Local Plan.

### **Is the proposed decision in accordance with:**

Budget                      Yes ☒ No ☐

Policy Framework    Yes ☒ No ☐

### **Recommendation:**

**That Strategic Planning Committee agree the draft Heritage Strategy for public consultation to align with the second Reg 19 Local Plan consultation.**

### **Reason for recommendation:**

The NPPF (para.203) states 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.” The Local Plan outlines its policies for the district’s heritage, whilst the Heritage Strategy sets out more detailed aims, objectives and a plan of recommended actions. As the original Strategy has been subject to a ‘light touch’ update, an extensive public consultation is not considered to be necessary, however we are keen to receive feedback on our proposals and ensure our approach is undertaken in an open and transparent way and informs and is beneficial to the policies of the second Reg 19 Local Plan.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management,  
e-mail – [efreeman@eastdevon.gov.uk](mailto:efreeman@eastdevon.gov.uk), Tel 01395 517519

---

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☒ Council, Corporate and External Engagement
- ☒ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate

- ☐ Environment - Operational
- ☐ Finance
- ☒ Place, Infrastructure and Strategic Planning
- ☐ Sustainable Homes and Communities

**Equalities impact** Low Impact

**Climate change** Low Impact

**Risk:** Low Risk; The publication of a heritage strategy will help to protect, manage and enhance our historic environment and heritage assets, whilst encouraging social, economic and environmental benefits.

### **Links to background information**

Links to background documents are contained in the body of this report.

---

### **Link to Council Plan**

Priorities (check which apply)

- ☒ A supported and engaged community
- ☐ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☐ Financially secure and improving quality of services

---

### **Report in full**

#### **1. Introduction**

- 1.1 This report introduces a light touch review of the heritage strategy for East Devon and recommends that public consultation is undertaken to run alongside the second Regulation 19 Local Plan consultation. To comply with the Statement of Community Involvement [SCI January 2021](#) consultation should last for a minimum 4 weeks. On conclusion of the consultation a feedback report on comments made will be presented to this committee with recommendation for amendment to the strategy, where appropriate.
- 1.2 The strategy, in full, that is recommended for consultation is appended to this committee report.

#### **2. What is Heritage and why is a strategy necessary?**

- 2.1 The term heritage embraces history in all its forms, from buildings, spaces, art and artefacts to natural heritage such as landscape, flora and fauna and cultural heritage including place names, customs and traditions.

**The Historic Environment** is described in the NPPF (2024) as “all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”

**A Heritage Asset** is described in the NPPF (2024) as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”

- 2.2 The National Planning Policy Framework ([National Planning Policy Framework](#) p.203) states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This was reiterated in the comments received from Historic England in response to consultations on the Issues and Options and Draft versions of the emerging Local Plan. East Devon has a rich historic environment and an abundance of heritage assets that provide very significant environmental, social and economic benefits for the district. As an irreplaceable resource the strategy will help to ensure that they are protected, maintained and enhanced to the advantage of future generations.
- 2.3 The existing [Heritage Strategy](#) covers the period 2013-2031 and, as more than 5 years have passed since its adoption and many of the short term actions have been achieved, it is considered an appropriate time to refresh and update it so that it can support the policies in the new Local Plan.
- 2.4 The new strategy follows the same format as the original and presents a summary of the historic environment of the district, its significance and its benefits. It also identifies the heritage issues in East Devon and develops objectives for the future with an action plan for the delivery of our recommendations. In more detail:

### **Section 1:**

Following an introduction, this sets out the purpose of the strategy, provides information on the role of the Council and other organisations, sources of information and a background of legislation and policy. It also discusses the implementation of the actions in the original strategy and highlights the very significant progress made on these.

### **Section 2:**

The overall strategy for the future of our heritage is met through a range of aims and objectives. These are addressed in the three themes of:

#### **A: Understanding and appreciating our historic environment**

This section provides an overview of the historic environment, detailing significant designated heritage assets such as Conservation Areas, Listed Buildings, Parks and Gardens, Scheduled Monuments, and the World Heritage Site coastline and landscape. It also briefly covers undesignated assets, including archaeological findings.

#### **B: Positively managing our historic environment**

This theme sets out our current policies and programmes relating to development management, Conservation Areas and heritage assets at risk. It identifies issues and looks at the future programme of managing these designated assets and the potential for a local list of undesignated assets, whilst providing further guidance on local distinctiveness. A significant new section relates to carbon reduction and climate change

mitigation and how this can be achieved, particularly in listed buildings, without damaging their intrinsic character.

### C: Enhancing and benefitting from our heritage

This theme looks at the value of our heritage as a part of sustainable development, and the social, economic and environmental benefits it provides for East Devon. It identifies how we can work better with partners and communities to enhance our heritage and make the most of these benefits, particularly in terms of working with Neighbourhood Planning groups and informing their policy production. It also considers the wider policy context.

#### **Section 3:**

Implementation of the strategy is considered including resources, benefits and monitoring. The objectives raised from each theme are developed into a plan of recommended actions, detailed initially for the next three years. Many of these actions follow on from the original strategy, and are maintenance tasks or updating of information.

#### **Section 4:**

Appendices include a summary description of the Conservation Areas of East Devon, information and maps for each of our historic town centres, details of partners and local history organisations. This has been updated to reflect the new Local Plan policies and latest guidance.

### **3. Resource Implications**

- 3.1 The actions recommended in the strategy have been carefully considered in the light of resource implications. They are either a priority as they are needed to fulfil a statutory duty, or are expected to produce significant beneficial outcomes whilst minimising resources in the long term.
- 3.2 A significant number of short-term priorities identified in the original strategy have been wholly or partially achieved and many of the actions in this, updated, strategy involve further or ongoing work building on these achievements whilst minimising the resources required. An example is the establishment of a heritage section on the Council's website as an action in the original strategy, which will continue to be monitored and updated in this one.
- 3.3 The strategy continues to utilise the enthusiasm and expertise of East Devon communities, many of whom have taken on ownership and accountability of their local area through neighbourhood plans, with volunteers driving the process forward. Along with specialist historic groups, volunteers will continue to be encouraged to identify non-designated heritage assets locally. Specific support will be provided to Neighbourhood Planning groups who wish to protect heritage assets through designation and/or producing policies and continues to encourage resourceful ways for communities to help manage assets in their local areas. A number of pilot schemes were implemented

following the original strategy and these have informed the actions in the current strategy.

- 3.4 The original strategy required a considerable investment of staff time facilitating and advising on training, but this has built capacity within local communities to help manage their own assets and further training is likely to be delivered via support for Neighbourhood Planning. It also required provision of a more comprehensive website to provide a base for the exchange of information and links to other organisations, guides and training in heritage issues. The new strategy proposes that the improved webpages be maintained and added, recognising that the majority of Officer input has already been undertaken.
- 3.5 It should be noted that the devolution proposals are likely to have an impact on the availability of staff and other resources to implement the action plan. Details are not yet known, but this could offer the opportunity to work collaboratively with staff from other Devon authorities and could increase the scope of future projects. Recognising the uncertainties, and the potential need to review the strategy within a few years to ensure a consistent approach across authorities, the majority of short term actions focus on existing processes and projects rather than committing to major new initiatives.

#### **4. Historic England feedback**

- 4.1 Historic England were informally asked to comment on a draft version of the strategy and fed back very positively and usefully:

*Overall, the Strategy appears to be sound and comprehensive, 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 on. The three themes continue to be a helpful way to frame the Strategy and facilitate the discharge of the authority's various policy obligations:*

##### **Theme A - Understanding and Appreciating Our Historic Environment**

*It seems that the first theme has been thoroughly explored, and the understanding and dissemination of the local heritage appears to be the main thrust of the authority's ongoing work.*

*We are pleased to see that the innovative approach of engaging the community, to help co-deliver the authority's heritage 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 undertake appraisals and other forms of assessments, including the review of the remaining conservation areas, by capitalising on neighbourhood plan communities.*

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

*The new strategy recognises the limited available resources. This clearly necessitates the prioritisation of core, regulatory tasks over more proactive management of the local heritage.*

*Given this challenge, 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 the current financial strictures. Furthermore, such an approach has intrinsic benefits that align well with Historic England's core values of: Active*

*Participation and Connecting Communities. We fully support East Devon's agenda that maximises community engagement and promotes the community's ownership of their heritage.*

*It is encouraging to see that clearly defined actions have been identified, and a monitoring regime is also in place to ensure that the strategy is indeed delivered. However, it might help to further refine "what success might look like" for each identified action, whether this is explicitly expressed in the strategy document itself, or as part of a complimentary project plan that guides the delivery of the Strategy.*

*It might help to have a more concrete series of actions that support each of the more broadly aspirational actions. For example:*

*Proposed Action: "Update and publish shopfront guides and any other relevant guides relating to heritage".*

*In this case, it might help to undertake an audit of existing local heritage guidance. Are there any gaps in the existing suite of guidance? Do some guides require updating? Could carefully targeted, new, local guidance help ward-off any imminent threats, or embrace emerging opportunities? ... or, perhaps some targeted new guidance might even streamline the authority's heritage management process and free-up resource for other tasks? Once this wish-list is identified, it could become a series of goals that would go towards delivering the headline, more-aspirational Action that is published in the Strategy.*

*It is good to see that Historic England's Heritage at Risk initiative has been highlighted, and that the authority recognises that any Conservation Areas potentially at Risk ought to be flagged and added to the register. We would be willing to discuss the Risk Register and happy to visit to review any potential candidates.*

*It would help to formulate a strategy and project plan that prioritises the council's review of its Conservation Areas. This might bring forward the review of Conservation Areas: where a Neighbourhood Plan is being proposed.*

*or where a timely review of the Conservation Area might help evidence housing allocations through the Local Plan process.*

*or where regeneration or other initiatives/investments might be planned;*

*or generally significant interventions are anticipated (eg major planning applications, transport infrastructure proposals etc).*

### **Theme C - Enhancing And Benefiting From Our Heritage**

*Understandably, this is potentially the most resource-heavy and challenging theme. The proposed range of strategies and actions all make perfect sense. However, as yet these strategies and actions seem like broadly aspirational themes, rather than fully thought-through, actionable programmes of work.*

*Inevitably, regeneration opportunities come forward in unforeseen ways, often emerging through the work of other departments, such as Economic Regeneration. However, it may be possible to be more proactive with this programme of work.*

*It could be wise to learn from other Local Authorities who are successfully delivering heritage-led regeneration elsewhere in the South-west. For example, Weston super Mare has been very successful at attracting government and lottery funding, by presenting a clear and attractive vision for the future of the place. Producing a vision; employing a destination / branding consultant; or commissioning Place Plans or Masterplans can repay*

*the investment many times over. Perhaps there is an opportunity to include some of this thinking about Heritage-led Regeneration in the new Strategy?*

*However, without commissioning any new initiatives, simply linking ongoing Conservation Area work to social or economic objectives/activities is likely to attract opportunistic funding, especially from non-heritage or mainstream sources. Historic England's own grant funding criteria now require particular benefits, such as civic and community related outcomes to ensure eligibility. So, taking a community-led approach is particularly timely.*

- 4.2 Historic England's comments have been taken into account in finalising the draft strategy for consultation. This is a high level, strategic document and some of their suggestions will be of most relevance when preparing more detailed documents leading on from the actions in the strategy, such as masterplans and new guidance.
- 4.3 Historic England's willingness to engage in this work, and in the wider local plan site assessment work, is welcomed and will be very useful in implementing the strategy actions.

## **5. Recommendations**

- 5.1 The new Local Plan contains a number of heritage policies and proposed allocations with heritage implications. To comply with the NPPF and address the matters raised by Historic England and other representors during consultation on the Draft and Reg 19 Plans, it is proposed that the existing Heritage Strategy be updated to cover the remainder of the new Plan period. The Strategy will form the basis of the evidence to support the heritage policies in the Local Plan and, through the action plan, demonstrate the Councils commitment to protecting and enhancing the historic environment.
- 5.2 It is recommended that the Heritage Strategy (2024-2042) is approved for the purpose of a public consultation, running alongside the second Regulation 19 Local Plan consultation. This will be hosted on the Council's website and advertised in conformity with the SCI. Following the consultation, it is recommended that, informed by feedback, the Strategy is updated and used to support the policies of the Local Plan.

### **Financial implications:**

There are no direct financial implications identified within the report. (AB/11/11/2025)

### **Legal implications:**

The legal implications are covered in this report (002533/14 November 2025/DH)