



ENGLISH HERITAGE

SOUTH WEST



Liz Pickering
Planning Services
Forward Planning and Conservation
Phoenix House
Phoenix Lane Tiverton
Devon
EX16 6PP

Our ref: HDP 5182

Your ref:

Telephone

24 March 2015

Dear Ms Pickering

Local Plan Review – Local Plan Review Options Stage Consultation

Thank you for the opportunity to comment upon the Local Plan Review Options Consultation. At this stage we have highlighted some headline comments which we would like to follow up with Mid Devon in order to ensure a sound Local Plan.

This is a broadly a positive document and we welcome the identification of the historic environment in the Vision and the aim to conserve and enhance it. Within the Spatial Strategy for Market Towns and Villages we welcome then intention to protect and enhance environmental assets including heritage and their settings.

We also support the identification of heritage at risk and adoption of a local heritage assets register. Though we would be interested to know how will this information be used by the Local Plan to inform a positive strategy for their protection and enhancement?

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At the section on Neighbourhood Plans it would be useful to reference at this point that English Heritage has produced guidance to assist local communities, this would assist in providing a positive plan.

As you have identified, one of the core dimensions of sustainable development is the protection and enhancement of the historic environment (NPPF para7). We welcome the policies S2 and S10 but suggest between the two policies there is considerable overlap and the distinction and purpose is somewhat blurred. There are a number of changes needed in order to provide a Sound Local Plan that is NPPF compliant.

The overarching principle of protecting and enhance Mid Devon's historic environment is an important one that needs to be clearly defined in a strategic policy such as S2 sustainable development. In its current wording it implies that identification and assessment is all that is required, but it must surely be about the decision. An amended positive wording could for example say:

“Protect and enhance Mid Devon’s historic environment, This includes both designated and non-designated heritage assets, such as scheduled monuments, listed buildings, conservation areas, historic parks and gardens, landscape and townscapes of importance and archaeology. Development affecting a designated or non-designated heritage asset and its setting will be expected to make a positive contribution to its character, appearance and significance.”

In addition there are clear positive overlaps for the historic environment to be considered with other policy sectors, particularly the good design policy. Sustainable Development Priorities Policy S2 and S10 both talk about good design and should better incorporate the historic environment. For example:

“Good sustainable design that respects local surroundings and materials, creates safe and accessible environments, designs out crime and establishes a strong sense of place and which helps to secure the conservation of heritage assets and integrates new development in to the historic environment will be encouraged.”

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be carefully considered against diverting the emphasis away from town centres and further undermining their vitality and viability.

Cullompton, Tiverton and Crediton

We broadly welcome policies S11 Tiverton, S12 Cullompton and S13 Crediton for the recognition of the role of the historic environment in achieving sustainable regeneration and development and maintaining vital and viable towns. We believe this starts to take on board our points from August 2013, that a key component of sustainable development is protecting and enhancing the historic environment and that this should not be undertaken as an isolated activity.

For both Cullompton and Tiverton, place shaping (or master planning) around the urban extensions has to play an important part and thought must be given to the character, at all levels, of the place to be created, its relationship with the existing town. It is important to optimise on mutual and complementary benefits, and how the whole will come together as a coherent entity which builds upon, reinforces and enhances existing identity and local character. A failure to properly integrate the development proposals will do nothing to enhance the character of the historic towns or their vitality and viability.

We note that you have identified that there are 22 heritage assets at risk and 3 conservation areas (Bow, Cullompton and Tiverton). What will Mid Devon's strategy be for addressing these?

Site Allocations

Turning to the Site Allocations we would like to draw your attention to some areas of concern. At this stage these are only indicative of areas of concern and should not be viewed as a thorough assessment of the assets in your area. We note that several sites make reference to archaeological investigation and appropriate mitigation. While we are supportive of the identification of the this issue the wording tends to assume that mitigation is all that is required to resolve harm. We advise, if you have not already done so, that you contact the Devon County Archaeologist and your own Conservation Team to ensure your evidence of impact upon the Historic environment is fully understood and that you can start to make considered decision that do not harm the historic environment.

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TIV2 Careful consideration should be given to wider landscape and townscape issues, possibly extending to Halberton in the east. There are a number of listed buildings around the area and how these and their settings will be incorporated should be carefully considered. This being some considerable distance from the town centre will development here positively contribute to the town centres vitality viability or detract from it if new retail is proposed out of town?

TIV13 We have strong concerns about the implications for this site upon the setting of Cranmore Castle to the south.

CU11 Careful consideration should be given to wider landscape and townscape issues.

CRE15 We have considerable concerns about the allocation of these sites on setting of Downes House. These should be withdrawn.

Willand /Junction 27 What are the implications on the setting of Bridwell Registered Park and Garden and wider landscape issues from this site?

Villages

A number of the villages have options for significant development sites, many are identified as conservation areas and some benefit from highly graded listed structures. . While these historic assets don't necessarily prevent the opportunities for homes and jobs, care is needed to ensure there is no harm to the historic environment. This is not intended to be an exhaustive list all sites should be properly assessed for impacts and harm upon the historic environment.

Bow – Land adjacent to Bow Mill Lane and land adjacent to Jackman car park, what are the impacts upon the conservation area and its setting?

Burlescombe – churchyard Field, adjacent the Grade 1 Church of St Mary the Virgin?

Chawleigh - Tower Meadow and Barton appear to impact upon the Grade 1 St James Church?

Cheriton Bishop – a number of sites appear to impact upon the setting of the conservation area?

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Cheriton Fitzpaine - a number of sites appear to impact upon the setting of the conservation area?

Culmstock - Culmstock, Glebe and Rackfields could impact upon the Grade II* All Saints Church and the conservation area?

Halberton - Land at Blundells Road could impact upon the Grade II* cottages and the conservation area and its setting?

Morchard Bishop – Church Street appears to affect the conservation area and the Grade 1 St Mary's Church and their settings?

Sampford Peverell – Morrells farm and Land off Mountain Oak farm appear to impact upon the conservation area?

Silverton - What is the implication of Glebe upon and the Grade 1 St Mary the virgin and the conservation area and its setting?

Uffculme - What are the implications of land off chapel hill and land adjacent to Sunnysdene upon the conservation area and the settings of a number of listed buildings?

Yeoford - Land off Lower Road and the implications for the conservation area and its setting?

I hope that you find the headline issues I have raised useful. English Heritage would appreciate an on-going discussion as the local plan emerges.

Yours sincerely

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Principal Planning Adviser

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