

East Devon Local Plan 2020-2042

Site Selection report Addendum – Historic Environment Site Assessment Seaton



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Contents

1	Introduction.....	4
2	Site Reference Seat_13a	5

1 Introduction

- 1.1 East Devon District Council is preparing a Local Plan covering the period 2020 to 2042 that will allocate sites for development. The site selection process is a judgement that balances top-down strategic issues relating to the Local Plan district-wide housing and employment requirements and the spatial strategy for the distribution of development, with the specific factors in the site assessments. For each settlement, a Site Selection report¹ contains the assessment of sites and identifies those which will be allocated, alongside those that will not, with reasons why.
- 1.2 The Regulation 19 Publication Draft Local Plan consultation took place from February to March 2025. Historic England (HE) and Devon County Council (DCC) responses identified major concerns for some sites, relating to the impact upon the historic environment.
- 1.3 In summary, the Local Plan consultation response from HE states the proposed allocation Seat_13a has the potential to result in considerable harm to the significance of the Scheduled Monument 'Roman and earlier settlement at Honeyditches' which adjoins the site to the south. There is potential for associated archaeology to exist in the allocated site, and conservation of the remaining rural setting should also be a priority. HE therefore recommends that Seat_13a is removed from the Local Plan. Otherwise, a desk-based assessment and potentially a site evaluation, along with a more detailed understanding of the potential impact upon the setting, are needed to justify the allocation
- 1.4 DCCs Local Plan response objects to the allocation of Seat_13a until further archaeological work is undertaken. This is required as the site lies in an area of known high archaeological potential, being located adjacent to the site of a nationally important late Iron Age farmstead and Roman villa Scheduled Monument.
- 1.5 The landowner of Seat_13a (East Devon District Council) commissioned archaeological work in response to HE and DCC comments, comprising a Historic Environment Impact Assessment and an Archaeological magnetometer survey, October 2025.
- 1.6 This report is an addendum to the Historic Environment Site Assessment prepared for site Seat_13a, in response to Local Plan comments from Historic England and Devon County Council and informed by the further archaeological work and subsequent HE and DCC comments on this work.

¹ Site Selection reports are available at: [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

2 Site Reference Seat_13a

Site details

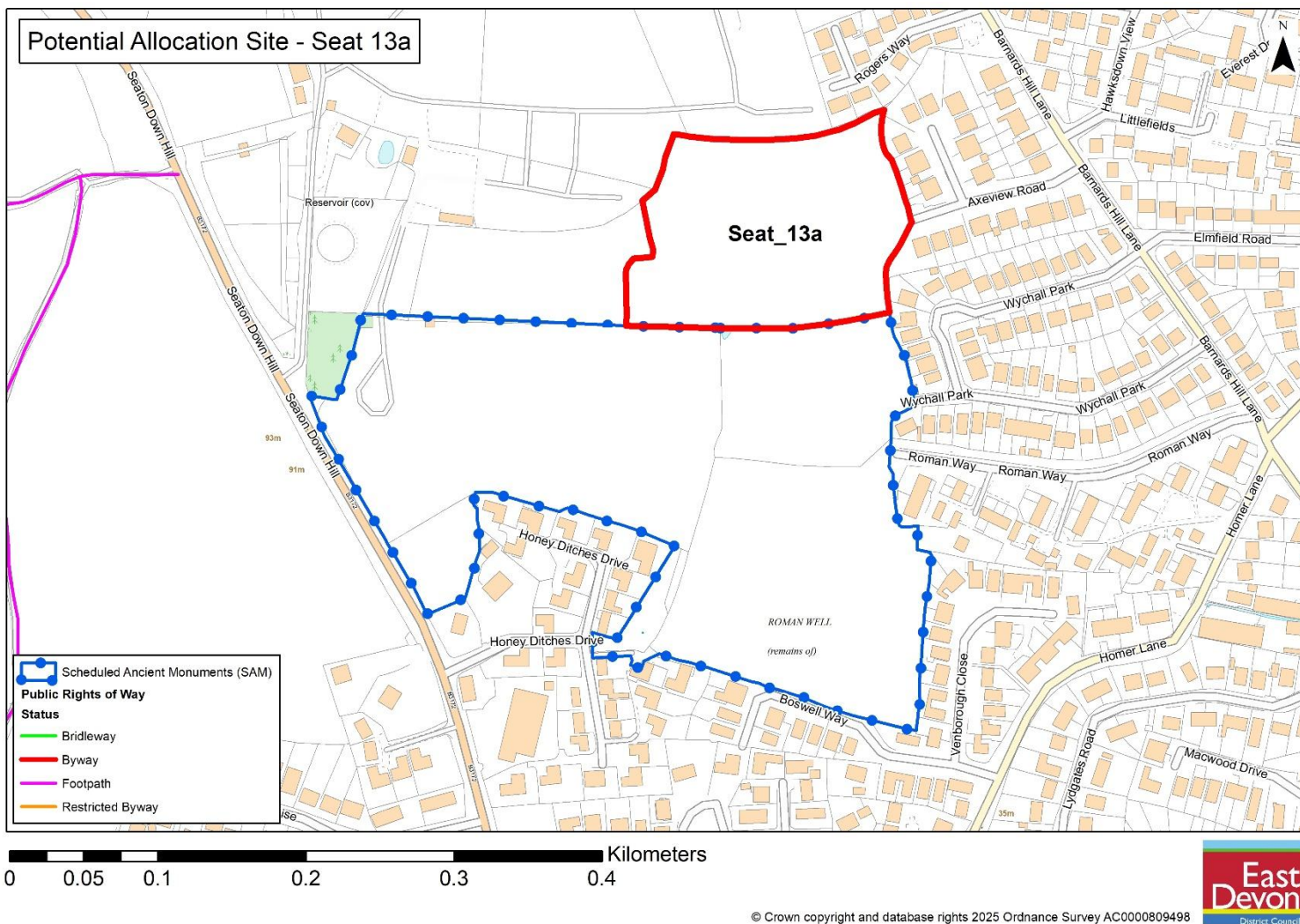
Settlement: Seaton

Reference number: Seat_13a

Site area (ha): 2.17

Address: Land adjacent to Axe View Road, Axe View Road, Seaton, EX12 2JT

Proposed use: Residential



Photos



View looking south west towards the site from B3172 Axmouth Road, 2.4km away. Seat_13a is beneath the arrow, the Scheduled Monument comprises the fields to the left



View looking west towards the site from B3172 Axmouth Road, 1.6km away. Seat_13a is beneath the arrow, the Scheduled Monument comprises the fields to the left



On-site view, looking east across the site



View from southern edge of site at the boundary with the Scheduled Monument, looking north



On-site view looking north west across the site



The NE field of the Scheduled Monument is in the foreground, with Seat_13a beyond the hedgerow in mid-distance.



View from centre of Seat_13a, looking SE. The Scheduled Monument is located beyond the hedgerow in the foreground

Historic Environment Site Assessment

Notes on history of area

Seaton is a rural seaside town whose history is strongly influenced by the sea and River Axe estuary. Archaeological finds indicate people living in the area for over 6000 years. In Roman times, Seaton was an important port and harbour with a significant Roman villa at Honeyditches to the west. Seaton became known for producing salt in the 18th century. The arrival of the railway in Victorian times meant that Seaton changed quickly from being a small fishing village to a tourist town, with an accompanying building boom of hotels, guest houses and large houses/apartments. These buildings are often finished outside with brick and flint, with low walls covered in pebbles reminiscent of the "Devon bank". One of first holiday camps in the country opened in Seaton just before the Second World War, and the town remained a popular tourist destination into the 1940s and 50s. However, the loss of the train station in the 1960s saw tourism decline, when many hotels and guest houses gradually turned into nursing homes. The 1960s/70s saw some unsympathetic architecture along the seafront, and estates with little character built to the north of the town, including many bungalows. The development of uniform housing estates in the north continued in the latter part of the 20th century. Since the year 2000 there has been greater emphasis on developing brownfield and infill sites across the town, including in gardens of large properties and by demolishing small industrial units or older homes.

Overall conclusion

Medium: no significant effects which cannot be mitigated. An impact is predicted, but would not compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable. The overall significance of the asset would not therefore be materially changed.

Step 1. Identify any heritage assets potentially affected	
Is the site within 100 metres of a designated heritage asset?	Yes. Roman And Earlier Settlement At Honeyditches Scheduled Monument adjoins to the south, along the southern boundary of the site.
Could development of the site affect any heritage asset (designated or non-designated) or its setting?	Yes. Scheduled Monument adjacent to southern boundary.
List any heritage assets potentially affected.	1 - 'Roman And Earlier Settlement At Honeyditches Scheduled Monument'.

Step 2. Existing contribution of site to significance of heritage asset	
Heritage asset 1	
Description of asset	Roman And Earlier Settlement At Honeyditches Scheduled Monument (SM). Includes a Roman villa which overlays the site of a pre-Roman Iron Age/Romano-British farmstead. Survives as below ground remains and slight earthworks.
Significance of asset and setting	Medium. The Scheduled Monument survives as below ground remains and slight earthworks, with limited above ground presence of the asset. Dwellings adjoin the eastern and southern boundaries of the SM, with a road to the west, and caravan park beyond Seat_13a to the north. Views of the urban form of Seaton particularly prominent to the east. In any case, the setting only forms a small element of the significance of the SM which is mainly represented by its below ground archaeological evidence. No deliberate views in the direction of Seat_13a from the archaeology within the SM have been identified (Land West of Axeview Road, Seaton, allocation ref. Seat_13a, Historic Environment Impact Assessment, October 2025)
Relationship of site with heritage asset	Site can clearly be seen from the Scheduled Monument, adjacent to the south. The SM is positioned on an east-facing slope on the western side of the Axe Estuary, buildings have been shown by excavation to be orientated north east-south west and north west-south east. 1888-1890 map shows the Roman Villa located in the southern part of western field of the SM. A geophysical survey has identified a small number of anomalies that may be contemporary with, but not as extensive or potentially significant as, the remains found at Honeyditches (Land West of Axeview Road, Seaton, allocation ref. Seat_13a, Historic Environment Impact Assessment, October 2025).
Level of contribution (site to heritage asset)	Moderate
Further assessment required?	Intrusive archaeological investigations, through an excavation of a series of evaluative trenches to test the anomalies identified in the geophysical survey and remaining parts of the site.

Step 3. Identifying potential impact on significance of heritage asset	
Heritage asset 1	
What impact would development have on the heritage asset and its setting?	Moderate. Close proximity means a moderate impact on the asset and its setting, given the potential for archaeology finds on the site. A geophysical survey has identified a small number of anomalies that may be contemporary with, but not as extensive or potentially significant as, the remains found at Honeyditches. The main interpreted anomalies present could represent a ring ditch, a small terrace and slight rectilinear enclosure (Land West of Axeview Road, Seaton, allocation ref. Seat_13a, Historic Environment Impact Assessment, October 2025). The setting is already compromised by modern development on most sides. In any case, the setting only forms a small element of the significance of the heritage asset.
Could the site be developed in a way that minimised potential impact?	Undertake intrusive archaeological investigations prior to developing the site. Potentially restrict development in area closest to SM.
Would the development affect the heritage asset in other ways?	Yes. Change in landscape context.

Step 4. How to maximise enhancements and avoid harm	
Heritage asset 1 maximising enhancement	
Could the development improve public access to and interpretation of the heritage asset?	Yes
Would development enable further research and recording of the heritage asset?	Yes
Would development enable better revealing of the significance of the heritage asset?	Yes
Would development enable the asset to be removed from the at risk register?	No
Heritage asset 1 avoiding harm	
Are there reasonable alternative sites?	See notes
Could the site boundary be changed to avoid harm?	No
Could the amount of development be reduced to avoid harm?	No
Would a different type of development (use) avoid harm?	No
Could design avoid harm?	Yes
Notes	If intrusive archaeological investigations identifies particularly valuable findings, these can be excavated and/or development of these areas could be avoided, if necessary. Could retain a green open buffer in the south of the site, closest to the SM. Interpretation boards could be installed to explain archaeological records and the SM. Alternative sites are proposed at Seaton, consistent with the Local Plan Spatial Strategy.

- 2.1 As previously noted, in response to comments on the Local Plan, the landowner of Seat_13a commissioned consultants ('AC Archaeology') to undertake archaeological work, comprising a Historic Environment Impact Assessment and an Archaeological magnetometer survey.² This report was sent to Devon County Council and Historic England in October 2025 – a summary of the comments from these organisations are set out below, along with a response from AC Archaeology.

Summary of Devon County Council comments on the Land West of Axeview Road, Seaton, allocation ref. Seat_13a Historic Environment Impact Assessment and associated Archaeological magnetometer survey

- The geophysical survey identified anomalies likely linked to below-ground archaeological features, possibly associated with a Roman villa and late prehistoric farmstead to the

² These reports are available at [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

south. These anomalies suggest the presence of ditches and potentially a prehistoric or Romano-British roundhouse.

- The villa and earlier settlement are nationally important designated heritage assets (scheduled monument).
- Any below-ground archaeological deposits extending into the proposed allocation area should be considered potentially of national importance unless proven otherwise.
- Paragraph 213 of the National Planning Policy Framework (2024) requires clear and convincing justification for any harm to designated heritage assets:
 - Substantial harm to assets of the highest significance (which include scheduled monuments) should be wholly exceptional.
 - Footnote 75: Non-designated heritage assets of archaeological interest equivalent to scheduled monuments should be treated under designated asset policies.
- Remote sensing alone cannot determine the significance of archaeological deposits; intrusive investigations (evaluative trenches) are required.
- Excavations will confirm the nature of anomalies and assess the accuracy of the geophysical survey – without this information, decisions on site allocation or development deliverability cannot be made.
- Historic Environment Team advises against allocating the site for development until investigations clarify the significance of archaeological remains.
- Current proposed policy wording assumes development is acceptable and mitigation possible, but this cannot be confirmed without understanding the extent and significance of remains.

Summary of AC Archaeology response to Devon County Council comments

- Geophysical survey identified anomalies interpreted as potential archaeological features, possibly linked to the Honeyditches scheduled monument.
- Anomalies are unclear and may relate to geological variations rather than archaeology. No evidence suggests another Roman stone building is present.
- DCC request for trenching is considered reasonable under the circumstances.
- The second aspect is the potential impact of Seat_13a development on the scheduled monument's setting, which is Historic England's main concern – a decision on carrying out trenching should be informed by HE comments.

Summary of Historic England comments on the Land West of Axeview Road, Seaton, allocation ref. Seat_13a Historic Environment Impact Assessment and associated Archaeological magnetometer survey

- No convincing evidence found to contradict advice that the site is unsuitable for development due to its impact on the significance of the Honeyditches Scheduled Monument (NHLE 1017819).

- Geophysical survey indicates potential survival of possibly nationally important archaeology beyond the scheduled area.
- Heritage Impact Assessment (HIA) did not consider the contribution of the setting to the significance of affected assets—an important omission.
- Roman villas were central to large agricultural estates, which supported their wealth and daily needs.
- Honeyditches villa historically sat within an agricultural hinterland, now eroded by Seaton's growth and modern development to the south and east, to the west by the B3172, and north by caravan park expansion. The north remains visually permeable partly due to the temporary nature of the caravan park.
- Proposed allocation field lies between the monument and caravan park, acting as a buffer that preserves a semblance of the villa's agricultural setting for visitors.
- Consistent advice: land is not suitable for development or inclusion in the local plan.

Summary of AC Archaeology response to Historic England comments

- Historic England are unlikely to change its advice and likely will continue to object to land allocation and oppose any development applications.
- HE's interpretation of Honeyditches as a Roman villa contrasts with an alternative academic interpretation as a mansio (Roman inn/hotel), where the landscape setting is less clear.
- Points to highlight:
 - Regardless of interpretation (villa or mansio), there is no surviving Roman landscape setting; surrounding land is historic or modern, and the agricultural landscape HE considers important to its setting does not exist.
 - Geophysics results do not show any clear nationally significant remains; anomalies could be geological and are not confirmed archaeology without trenching.
 - Newly found records from Devon County Council show former ditches containing Bronze Age pottery in Seat_13a, some 1,500-2,000 years earlier than the Roman building at Honeyditches, and therefore not associated with the Roman site.
- Even if trenching addresses below-ground archaeology concerns, HE are unlikely to change their advice on setting/significance issue.
- Archaeology is likely not nationally significant, but there is a small chance that it could be.
- HE objects to development generally in this field; likely that no mitigation through scale, design, or layout would address their concerns.

- Consider whether public benefit of development could outweigh the harm on the impact on the significance of the scheduled monument.
