



## DEVON ARCHAEOLOGICAL SOCIETY

Planning Policy  
East Devon District Council  
Border Road  
Heathpark Industrial Estate  
Honiton  
Devon  
EX14 1EJ

25<sup>th</sup> January 2026

Dear East Devon Planning Policy Team,

### **East Devon Heritage Strategy Comments from the Devon Archaeological Society**

The Devon Archaeological Society (DAS) welcomes East Devon's commitment to protecting and celebrating its built historical and archaeological heritage, and its historic landscapes. The Society therefore welcomes the revised Strategy. However, the DAS would like to make the following suggestions that we feel would enhance the Strategy. These are listed by section, as numbered in the consultation document.

**General Comment:** Given East Devon's role in the management of Listed Buildings and Conservation Areas, we recall that the draft of the original strategy did, understandably, have a built historic environment focus. The final version, and this revision do contain much more on the district's rich archaeological heritage, and its historic landscapes, which the DAS welcomes. However, this has resulted in various different terms being used across the document, such as Heritage, Historic Environment, Built Historic Environment, Archaeology, and Historic Landscape. The strategy may therefore benefit from a short definition of these terms.

**1.Introduction:** Although referred to elsewhere, this could include historic landscapes, as most of East Devon's landscapes (excluding the coast) aren't entirely 'natural'.

**1.4:** Could mention that the National Landscapes are also valued for their archaeology and historic landscape value, although current DEFRA drivers focus on meeting biodiversity targets. The East Devon NL originated as the East Devon Heritage Coast, which remains as a non-statutory designation. Heritage Coasts were selected for their natural beauty, wildlife and heritage value, with conservation and access to be promoted. The Jurassic Coast also contains many sites of historic and archaeological interest related to its geology.

**1.51:** Should also mention the Levelling Up & Regeneration Act 2023.

**1.56 to 1.59:** This section on Devon County Council's role probably needs some re-working and additional relevant detail, from our understanding of it. However, we defer to DCC's own comments on this matter.

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Devon Archaeological Society

*Registered Charity No. 276865*



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**1.64:** We understand that the Jurassic Coast Trust folded last year.

**1.65:** The section on Local Societies should include the Devon Archaeological Society. The DAS:

- Promotes archaeological research and the instigation and execution of fieldwork.
- Seeks the preservation of archaeological sites and buildings.
- Publishes material relevant to the archaeology of Devon.
- Promotes archaeology through meetings, lectures and other forms of instruction and publicity.

The DAS recently purchased Hembury Hillfort, Payhembury, and is managing the site, including public access. The DAS has produced guides to the hillforts at Hembury, Woodbury, and Dumpdon. This section should also include the Devon Gardens Trust.

**1.69 – 1.70:** Should mention the Levelling Up & Regeneration Act 2023, as this has sections relevant to statutory duties, including maintaining or having access to Historic Environment Records.

**2.3 – 2.4:** Although more detail on East Devon's prehistory is included elsewhere in the document, this section could be a bit longer, to balance the Roman and medieval sections.

**2.4 or 2.5:** Should mention the extensive Roman iron mining and smelting in the District. Recent(ish) finds, such as the Seaton Down Roman coin hoard could also be mentioned.

**2.20 - 2.30:** Conservation Areas are also likely to have high archaeological potential.

**2.33 – 2.35:** Parks & Gardens. Should mention the Devon Gardens Trust and their Local List of Parks & Gardens of Historic Interest.

**2.36 – 2.38:** Archaeological heritage. This section should be expanded to explain a bit more about the diverse forms that the district's archaeology takes, including below ground archaeology and standing earthworks or ruins. Also, the range in scale, from individual findspots to extensive field systems.

**2.38 – 2.39:** Scheduled Monuments – formally designated or protected as Scheduled Monuments, rather than 'recorded as'.

**2.39:** This section should clarify that most of the 'castles' are actually hillforts, or large prehistoric enclosures. There is one Scheduled medieval motte and bailey castle. Also one Roman Fort (at Axminster), and two or three Roman villas (the buildings at Seaton may or may not be a villa).

**2.40:** Barrows are late Neolithic, and early to mid-Bronze Age.

**2.42:** There are Roman military sites at Woodbury Farm (Axminster), where there is the later roadside settlement, and inside Hembury Hillfort. Villas at Membury and Holcombe. Seaton may be a 'Mansio' (Post station) rather than a villa.



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**2.43:** See comments on forts and castles under 2.39 above). There is a scheduled, medieval motte and bailey castle at Castle Hill, Kilmington. High Peak is particularly interesting, having a Neolithic defensive circuit, as well as an early medieval (Dark Age) one.

**2.46:** The Romans used Beerstone.

**2.48:** The Prayerbook Rebellion (1549) battle sites at Fenny Meadow, Windmill Hill (Woodbury) and Clyst St Mary could be considered important enough to be Registered Historic Battlefields. At least they could be treated as of equivalent status.

**2.49:** Should refer to the Devon Gardens Trust Local List of Parks and Gardens.

**2.50:** Establishing and managing a list of undesignated assets. Isn't this the Devon Historic Environment Record?

**2.54:** ED NL. Originated as the East Devon Heritage Coast. Has a particularly rich prehistoric archaeological heritage.

**2.55:** Blackdowns NL. Has prominent Iron Age hillforts, such as Hembury and Dumpdon, and Roman into medieval iron mining and later whetstone mining. Linked to geology and topography.

**2.56:** Green Infrastructure includes archaeological and historic features, including field systems, green lanes, and disused railway lines.

**2.76:** There could be more emphasis on the public benefit that can arise from archaeological or historic building conditions (NPPF 218). The DAS publishes some of the most important developer-funded archaeological work in the *Proceedings of the Devon Archaeological Society*. But public benefit can also include information panels and open days during excavations, as well as web-based information and educational outputs.

**2.78 – 2.80:** Listed Building Consent. Overlap with archaeology. Conditions can be applied regarding recording of any archaeological and historic building interest.

**2.86 – 2.87:** Preservation in situ also applies to important undesignated archaeological and built heritage assets.

**2.88:** Should refer to the Gardens Trust and Historic England as consultees.

**2.90:** Features of local interest can be buildings, structures, parks and gardens, open space with historic associations, above and below ground archaeological remains – from prehistoric flint scatters to Second World war pillboxes.

**2.89 – 2.92:** This section should clarify the relationship between the Local List and the Historic Environment Record. The HER was created by the DAS in 1975 to identify sites of all levels of importance, to guide planning, land management and research. It was passed to the County in



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1979. Sites on the HER may be of lesser, equal, or greater significance than sites that are on the Local List.

**2.92:** This should refer to consideration of historic landscapes, such as parks and gardens, and archaeological sites in the local list, not just built structures

**2.92:** Adoption of Devon Gardens Trust Local List of Parks & Gardens of Historic Interest should be considered as an Action.

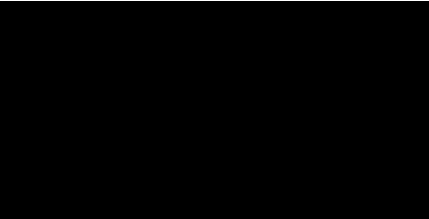
**2.132:** Heritage & tourism. Archaeological sites and historic landscapes also make a significant contribution here.

**2.206:** DEFRA fund conservation of and access to the historic environment – through various farming and forestry grants. DAS has been able to undertake management and access works at Hembury Hillfort through DEFRA's Farming in Protected Landscapes fund (via the Blackdowns National Landscape).

**Appendix 3:** Partners etc. – should include the Devon Archaeological Society.

The DAS hopes that you will consider the above as constructive comments that, if accepted, will enhance the Strategy. We will be happy to discuss any of the above further with you.

Yours faithfully,



Trustee & Vice President  
On behalf of the Executive Committee of the Devon Archaeological Society

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