

Appendix A –

Heritage Strategy (2024-42) Consultation: Response to Feedback

This document sets out the changes that have been made to the Heritage Strategy as a result of feedback gathered as part of the public consultation. The table below sets out the schedule of changes and the main reasons for the amendments (e.g. if text has been suggested for inclusion/deletion by a respondent). If any feedback has not been actioned, our response and justification can be found in the additional feedback table below the main table in this document.

All of the representations and feedback forms (redacted) received during the public consultation can be viewed in pdf format on the Heritage Strategy webpage: [Heritage Strategy 2024-2042 Public Consultation - East Devon](#)

Para or Section of updated strategy	Changes	Revised text	Reason for changes
1.2	Text amendments and additions	The government’s NPPF defines the ‘historic environment’ for planning purposes. The term heritage embraces history in all its forms, from buildings, spaces, art, artefacts and archaeological sites to the historic landscape such as the natural landscape, farm steads and hedgerows, flora and fauna and cultural heritage including place names, customs and traditions. The strategy will touch on many of these aspects but will focus on the role of the Council and how we can better work with partners and communities in the future, especially in respect of our built heritage. A glossary of key terms can be found in appendix 3 at the end of this document.	Suggested additions by Historic England (HE) and the Devon Historic Environment Team (DCC HET) and Devon Archaeological Society (DAS) for clarity around the Historic landscape. Signpost readers to the glossary appendix.
1.5	New paragraph added	The National Landscapes are also valued for their cultural landscape value (ie. Historic Landscape, built heritage, archaeology) and the East Devon NL and the Blackdown Hills NL contain some of East Devon’s	Suggested text from DCC HET and DAS

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>most important and distinctive historic landscapes and heritage assets. Overlapping the Jurassic Coast WHS and the East Devon NL, the East Devon Heritage Coast is a non-statutory designation that EDDC is responsible for. It is recognised for its natural beauty, wildlife, and heritage and designated to improve accessibility to the visitors.</p>	
Footnotes 1, 2, 16 and 17	Text amendments	<p>¹ MHCLG (2024) National Planning Policy Framework, para 203 ² MHCLG (2024) National Planning Policy Framework, Annexe 2: Glossary ¹⁶ MHCLG (2024), National Planning Policy Framework, paragraph 203 ¹⁷ MHCLG (2014), National Planning Practice Guidance, Paragraph: 003 Reference ID: 18a-003-20190723, Revision date: 23 07 2019</p>	Response to H.E feedback - NPPF was incorrectly listed as being prepared by DLUHC instead of MHCLG.
1.21	New paragraph and footnote links (3-7) added	<p>This strategy acknowledges that Heritage work programmes exist within other relevant Council Strategies; for example, the East Devon Cultural Strategy and East Devon Tourism Strategy¹ and aims to work towards these shared goals. The Arts & Culture Network² and Tourism Network³ are key district-wide groups with relevant work (such as the Cultural Tourism Map with heritage partner profiles⁴) and synergies with the priorities of the Heritage Strategy, and the potential for collaboration with these groups will be explored.</p>	To acknowledge that the strategy sits within, and links up with, the work conducted by multiple teams within the council to positively impact the districts built and living heritage.
1.29, 1.30, 1.44, 1.46, 1.47, 1.48 – What has been achieved since the	Text additions and amendments	<ul style="list-style-type: none"> Action: Promote strategy and web pages; develop a publicity plan to include press and social media <p>Completed: A publicity plan was considered by the Heritage Working Group and implemented with a series of press releases. Articles appeared on Facebook and Twitter and through the press, including the Exmouth Journal, promoting the heritage strategy and its initiatives. Heritage assets have been promoted through the new Cultural Tourism Map, launched in 2024.</p>	To include additional work completed by the Culture and Economy teams within the council since the last heritage strategy was produced.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
last strategy.		<ul style="list-style-type: none"> • Action: Support events such as the annual Heritage Open Days and the East Devon AONB Heritage Conference. Promote heritage strategy and website at heritage events. Arts and Culture East Devon and East Devon Tourism Network promoted heritage events. • Action: Increase attendance at meetings or events with partner organisations to work towards common goals <p>The Conservation Officer attended partner meetings including those organised by the East Devon AONB, Devon County Council and Historic England. The Cultural Producer attended partner meetings including those organised by Museum Development South West and invited the National Lottery Heritage Fund to speak at an Arts and Culture East Devon Network meeting.</p> <p>1.46 Action: Work with others to identify projects and sources of funding</p> <p>Members of the Heritage Working Group have been productive in identifying new projects and funding including</p> <ul style="list-style-type: none"> • Heritage Action Zone and town centres funding: exchange of information • Energy efficiency grants and loans, working with the Empty Homes Officer • Energy efficiency in older buildings training • Through the UK Shared Prosperity Fund the Creative East Devon Fund, the Culture, Leisure and Tourism Fund, the Carbon Action Fund were also set up benefitting multiple local museums. 	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<ul style="list-style-type: none"> • Action: Facilitate, or advise on, a range of training opportunities especially for neighbourhood planning / community groups with an interest in heritage. • Information on training opportunities from various sources have been gathered which communities can use. Links are provided on the East Devon Heritage and Local Assets webpage. • Arts and Culture East Devon have delivered a curated programme of free training attended by East Devon Museums. Topics have included: Fundraising, Marketing, Volunteer Recruitment and Retention, Carbon Literacy, Collections Care and Management, Governance, Accreditation, Care of Photography, Digital Accessibility and Natural History Collections Display. <p>1.48 Action: Produce a template to guide neighbourhood planning groups in site assessments to ensure that heritage matters are appropriately considered A template has been produced.</p>	
1.54 (Key orgs and sources of information) and 1.80 (Legislative Framework)	New paragraphs added	<p>1.54 Under the Levelling-Up and Regeneration Act (LURA) 2023, the council must have ‘special regard’ to the desirability of preserving or enhancing heritage assets and their setting. This includes preserving or enhancing any feature, quality or characteristic of the asset or its setting that contributes to its significance. ‘Relevant assets’ as described by the LURA include Ancient Monuments, Historic Parks and Gardens, Protected Wreck Sites and World Heritage Sites.</p> <p>1.80 The Levelling Up and Regeneration Act (LURA) 2023 proposed a number of changes and new provisions relating to the historic environment and the council’s duties with regards to heritage, some of which have not yet been fully implemented. Following the implementation of the act, the council must now have ‘special regard’ to the desirability of preserving or enhancing relevant</p>	As recommended by H.E, DCC HET and DAS. To reference and explain the council’s duties under the Levelling Up and Regeneration Act 2023 (LURA 2023).

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>assets and their settings, such as Scheduled Monuments, Registered Parks and Gardens, Protected Wreck Sites and World Heritage Sites, alongside the statutory duty already in place for listed buildings and conservation areas. Other provisions introduced by LURA include the removal of compensation rights and mandatory consultation with Historic England for Building Preservation Notices (BPNs) used to assess buildings for listing, empowering the council to issue temporary stop notices for works being undertaken on a listed building without an LBC or without complying with the conditions of an LBC, and the potential for urgent works to be undertaken to all parts of a listed building if necessary. Finally, the act has raised the statutory status of Historic Environment Records (HERs) with relevant authorities' duty to maintain these lists, as Devon County Council does on behalf of the Devon Districts including East Devon.</p>	
1.56 – 1.59	Text amendments and new paragraphs	<p>Historic England is the public body that helps people care for, enjoy and celebrate England's spectacular environment, see: https://historicengland.org.uk/about/what-we-do/</p> <p>The role of Historic England includes advising government on the designation of Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Battlefields and Protected Wreck Sites identified by them or put forward by individual request, and managing the list of designated assets, as well as advising the government on matters of World Heritage. They primarily provide advice on Grade I and Grade II* heritage assets and deal with Scheduled Monument consents. Information is available on designated assets in East Devon including those categorized as 'at risk'.</p>	In line with suggestions by H.E to better explain the role of HE in the planning process and beyond.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Historic England has a formal role in the planning process, including being a consultee on Local Plans and on certain applications for planning permission and listed building consent</p> <p>The organisation also carries out extensive research and monitoring of heritage assets and their value, and provides information on funding, with a comprehensive range of guides through their website. 'Heritage Counts' is an annual audit of England's Heritage, monitoring 'heritage indicators' for each region with information collected by the Historic Environment Forum and reported on by Historic England.</p>	
1.62 – 1.66	Text amendments/additions	<p>The County Council maintains the Devon Historic Environment Record (HER) as a public record and on behalf of Devon's local planning authorities. The HER contains information about designated, locally listed and other undesignated heritage assets, including archaeological sites, historic buildings, landscapes and findspots, from the Palaeolithic (Old Stone Age) to the mid-20th Century.</p> <p>The HER holds source material such as historic tithe and Ordnance Survey maps, RAF aerial photos from the 1940's, other archaeological aerial and ground photographs, published and unpublished material, available to view in person or online.</p> <p>The HER contains links to reports and studies, such as Historic Landscape Character Mapping, revealing the evolution of East Devon's field patterns through the ages. Also, the Devon Historic Market & Coastal Towns Survey, which includes Exmouth, Honiton and Seaton.</p> <p>The HER contains the results of systematic archaeological analysis and interpretation of aerial surveys, including conventional aerial photography from the 1930s to the present day, and recent remote sensed data</p>	Suggested text provided by DCC HET.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>(LiDAR – Light Detection and Range) revealing a wealth of evidence on the history of East Devon. These Aerial Investigation & Mapping Projects, funded by Historic England, have covered the South Devon Coast (including East Devon), the Blackdown Hills, and East and Mid Devon River Catchments.</p> <p>Information held in the HER underpins the County Historic Environment Teams role in advising East Devon District Council on spatial planning and development management casework, and the County Council as the minerals and waste planning authority and highway authority. Also advising statutory undertakers for pipeline and cabling operations (such as water, gas and electricity companies), and conservation bodies, farmers and land managers for national and local environmental stewardship schemes, tree-planting, and biodiversity habitat enhancement initiatives.</p> <p>=</p>	
1.67	New Paragraph	<p>Devon County Council As the Highways Authority, Devon County Council is responsible for maintaining heritage assets such as historic bridges, milestones, traditional waymarkers, and its role in managing the public realm in East Devon’s historic towns/villages</p>	Suggested text provided by DCC HET.
1.72	Text amendments	<p>The Jurassic Coast World Heritage Site The Jurassic Coast Trust closed in January 2025. Responsibility for the World Heritage Site now sits with Dorset Council and Devon County Council with East Devon District Council staff participating in site governance.</p> <p>.</p>	The Jurassic Coast WHS Trust ceased operations in January 2025, this paragraph has been rewritten to address the responsibility of Dorset Council, DCC and EDDC for the WHS. Feedback from multiple respondents.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
1.73	Text addition	There are many local historic societies and associations, heritage centres and museums providing more detailed information on the historic environment in their area, which are listed in Appendix 3. Information may also be available in libraries and online, with publications and guides by societies such as the Proceedings of the Devon Archaeological Society.	Recommendation from DAS.
1.74	New paragraph added	<p>Museum Development South West</p> <p>MDSW exists to support museums and heritage organisations to develop and improve across all areas of their operation. They provide trusted, local and relevant development services to support museum and heritage organisations to improve, innovate, collaborate and celebrate. The Museum Development Officer for Devon works closely with the Arts and Culture East Devon Network, creating opportunities which build confidence and skills, encourage innovation, and celebrate our heritage and Culture.</p>	Recommendation from internal feedback (Culture & Economy teams).
1.76	Text additions	As it is periodically updated, it is important to note that when drawing up proposals, reference should be made to the most recent version of the NPPF.	Recommendation by H.E to ensure the most recent NPPF is referred to in planning proposals.
1.82	Text amendments	The emerging Plan will contain a suite of policies of particular relevance to the historic environment. These will be strategic policies and will include an overarching policy and then specific policies relating to listed buildings, conservation areas, Archaeology and Scheduled Monuments and historic landscapes, parks and gardens. The full Local Plan is available to view on the Council's website.	Missed capitalisation of 'Scheduled Monument' as highlighted by DCC HET/DAS
2.3 – 2.12	Text additions	Our district has a unique historic environment and range of heritage assets, which can be understood better by looking at what has gone	Recommendation from DCC HET and DAS for further information on East Devons rich history

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>before. Throughout the district there is much evidence of human occupation from the past in the present, from significant finds of Stone Age hand axes, particularly at Broom Quarry, and concentrations of Bronze Age Barrows at Farway and Brampford Speke, prominent Iron Age hill forts on the Greensand Ridges, spurs and outliers of the Blackdowns and coastal and inland promontory forts such as Berry Camp, to Saxon settlements and Roman roads, from medieval places of worship to Georgian, Victorian and Edwardian residences, from factories of the industrial revolution to World War II airfields, to name just a few.</p> <p>In rural areas the history of both farming and extractive industries are evident in the vast number of marl pits used for improving soil, clay pits used for pottery industries, and in the distinctive medieval strip fields which may be glimpsed in places, beyond the high 'Devon' banks and hedgerows defining many of our country lanes. The post-industrial landscape of the district includes deliberate planting of trees within former mineral extraction pits (marl, clay, sand/gravel) across the Blackdown and East Devon National Landscapes, that has created a now highly characteristic pattern of dispersed woodland.</p> <p>The district contains much evidence of the Roman conquest in its army camps and forts, and later some villas or highly Romanised farmsteads and enclosed settlements. Parts of the Imperial road system still survive, including what was the Dorchester to Exeter Road and 'Fosse Way.' Alongside this, evidence of extensive opencast iron mining and iron smelting can be found around the Blackdown hills, with a probable iron</p>	<p>(particularly Roman and medieval) and important heritage assets and landscape features.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>industry link to the Seaton Down Hoard, one of the largest Roman coin hoards ever found in the UK.</p> <p>East Devon has a rich heritage of urban centres, varying greatly in nature and character. Ottery St Mary's Saxon origins can be seen in the characteristic 'star' shaped pattern of its central routes, whilst this and the market towns of Honiton and Axminster were centres of the textile industry from medieval times. Honiton is a classic example of a planned town by the local lord, whilst Axminster originated as a Roman fort and small roadside town, with a Saxon royal and ecclesiastical centre at the heart of the modern town. Many of these urban centres, with the valuable historic built and archaeological asserts they may contain, are protected by the 34 conservation areas across the district.</p> <p>Farmstead groupings are also an important local feature, especially those of medieval origin or planned as a part of land estates, including those seen at Broadclyst, Gittisham and Broadhembury, and the Rolle Estate in the Otter Valley, whilst some fine manor houses and ecclesiastical residences remain, such as the Bishop's Court at Clyst St Mary.</p> <p>The quarrying of stone, such as that at Beer, and pottery making were other important industries at this time and local building materials and traditions including cob and thatch all contribute to distinctive local styles.</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Many of East Devon’s villages predate the 10th and 11th centuries, often centred around a parish church. As Christianity has been the main religion for more than 1500 years, churches form some of the most visible parts of our heritage, and the remains of an Abbey have survived at both Dunkeswell and at Axminster (Newenham Abbey). Historic non-conformist architecture can also be found across East Devon, including Methodist and Baptist chapels (e.g the Grad II* Loughwood Chapel) Reading Rooms, Sunday Schools and Quaker meetings houses.</p> <p>East Devon is also rich in toll houses and coaching inns, roadside features such as water pumps and troughs, Milestones, traditional finger posts/way markers, and in assets linked to water power, such as mills, factories and hydraulic rams.</p> <p>The Regency town of Sidmouth and other seaside resorts at Exmouth, Budleigh Salterton and Seaton all tell a story of their history through time, expanding with the development of railways. Good examples of the ‘Cottage Orne’ picturesque rustic buildings and later, fine Victorian terraces, Edwardian architecture and the Arts and Crafts style all contribute to distinctive town landscapes.</p> <p>Meanwhile, villages along the coast retain a local character that has been largely unspoilt by the expansion of tourism. The Second World War has also left many traces including pill boxes, radar stations and airfields telling the story of key events linked to the area, such as the Battle of</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		Britain (RAF Exeter), Battle of the Atlantic (Dunkeswell) and D-Day (RAF Upottery, Dunkeswell and training structures in the Pebblebed Heaths).	
2.16	Text amendments	Designation of an asset recognises the value(s) of its significance and gives it protection by law or policy for its management and enjoyment, now and in the future. The setting of an asset, although not designated in its own right, is also afforded protection when it makes a contribution to the significance of the asset, although not designated, may also be offered a degree of protection.	Suggested text provided by H.E.
2.17	Text amendments	Designated heritage assets may be Listed Buildings, Scheduled Monuments, World Heritage Sites, Conservation Areas, Registered Parks and Gardens, Battlefields or Protected Wreck Sites.	Recommendation by H.E to include WHS on the list of designed heritage assets
2.18	Text amendments	The most important heritage assets are formally recognised at a national or international level for their importance. In 2024, East Devon had 3,088 Listed Buildings, comprising nearly 4,500 individual buildings and structures (an asset may contain more than one individual building or structure), 8 designated parks and gardens and 112 scheduled monuments that are formally listed by Historic England.	Recommendation by H.E.
2.19 and footnote 24	Text additions	The number of listed buildings changes over time and up to date information can be viewed through the Historic England website. The District also has a World Heritage Site inscribed by UNESCO under criterion viii (Natural) ²⁴ , and 34 Conservation Areas that have been designated by East Devon District Council.	Suggested text provided by H.E.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>²⁴ Criterion viii(Natural) - 'to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features'</p>	
2.28	New paragraph	<p>It is important to note that Conservation Areas may also contain high archaeological potential, as the historic cores of many settlements could have origins stretching back to at least the medieval period.</p>	Recommendation by DCC HET and DAS
2.30, 2.31, inclusion of Colyton in Appendix 1 and reordering of Appendix 2.	Reclassification of Colyton as a Town rather than 'large village', alteration of conservation area statistics and addition of Colyton town centre profile	<p>2.30 Of the larger villages: there are eight Conservation Areas within the villages of Beer, Broadclyst,, East Budleigh, Lymptone, Otterton, Sidbury, Whimble and Woodbury and are often located around the centre of the village. Three are entirely within a National Landscape (see appendix 2) whilst Broadclyst Conservation Area is partly within and surrounded by National Trust property.</p> <p>Towns There is a concentration of five Conservation Areas in Sidmouth including the town centre, Elysian Fields, Bickwell Valley, Sid Vale and Sidford, and three in Exmouth at Albion Street, Bicton Street and Louisa Terrace. There also is one Conservation Area in each of the towns of Axminster, Budleigh Salterton, Colyton, Honiton, Seaton and Ottery St Mary.</p> <p>2.31 Six of the Conservation Areas, in Axminster, Budleigh Salterton, Colyton, Honiton, Ottery St Mary and Sidmouth incorporate the historic town centre. These are described in more detail in Appendix 1.</p>	Recommendation by Joseph Watson. Previous listing as a 'large village' was in-line with hierarchy of settlements rather than historic status of Colyton as a town.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Appendix 1</p> <p>Colyton Also known as “the most rebellious town in Devon” due to its links with the Monmouth Rebellions of 1685, Colyton is a small market town with Saxon origins and a history dating back to the 8th Century. Being a local centre, the town features a range of facilities including pubs, shops, cafes and a library, many within the town centre area that is located completely within the conservation area.</p> <p>The town has a range of richly detailed historic buildings, including the medieval church with lantern tower and a number of good 16th and 17th century houses, and a tightly knit built form with local and vernacular materials that has been largely undisturbed by 20th century developments.</p> <p>The local plan has is supportive of some development at Colyton that meets the neds of the immediate surroundings, whilst conserving and enhancing the quality of the historic built form. The nearby Beer Quarry Cave SAC will be protected, along with bat pinch points and semi-natural landscape between Colyford and Colyton</p>	
2.36	Text addition	The Devon Gardens Trust hold research and information on all of Devons Parks and Gardens and maintain a local list. Through the National Historic Gardens Trust, they are a statutory consultee on planning proposals affecting all registered Parks and Gardens.	Recommendation by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.38 and 2.39	Text amendments and new paragraph	<p>Archaeological heritage can take many forms, including earthworks, ruined buildings and structures, artefact scatters, individual findspots, below ground archaeological features and deposits (sometimes manifesting as archaeological cropmarks), as well as ancient field patterns and ancient environmental evidence preserved in waterlogged conditions. This heritage ranges from the Palaeolithic (Old Stone Age) to the Cold War of the 20th Century including the early prehistoric feature, significant Romano-British, medieval and post-medieval heritage, as well as modern industrial and military archaeology. This heritage is found across East Devon's towns and villages, as well as in the countryside and on the coast.</p> <p>Human activity in the district became frequent from 250,000 BCE and has left its mark with, for example, hand axes and other tools from the Lower Palaeolithic (Old Stone Age) found in the Axminster area.</p>	Recommendation by DCC HET and DAS.
2.42	Formatting issue	The most important archaeological remains are formally designated as Scheduled Monuments. Historic England carries out a programme of scheduling these nationally important archaeological sites, but anyone can make a nomination to Historic England.	To ensure consistency throughout.
2.43, 2.44, 2.46, 2.47, 2.48	Text amendments and additions	In 2024, East Devon had 112 Scheduled Monuments, notably its prehistoric Bronze Age bowl barrows and Iron Age hill forts. It has a diverse range including many Hillforts or prehistoric enclosures (many with 'castle' or 'fort' in their names) 1 Motte and Bailey castle, 1 Roman	Recommendation by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>fort , at least 2 Roman Villas, 2 abbeys, 6 bridges, 8 crosses, a holy well, a prehistoric field system, a manorial settlement, and an 'Ice House'.</p> <p>However, more than 60 of the district's Scheduled Monuments are 'barrows', which are particularly abundant around Farway Hill, Gittisham, Woodbury Common and in the Rewe, Upton Pyne and Bramford Speke area. Barrows are a type of burial mound where earth, and / or stone is used to cover a tomb and 'bowl barrows' are named due to their appearance of an upturned bowl. They were created during the late Neolithic period to middle Bronze Age (roughly 2500-1500 BCE) and provide important information on beliefs and customs as they served a ceremonial or ritual purpose. Barrows are often isolated but many occur in groups and are described as barrow cemeteries, three of which are in East Devon.</p> <p>Roman villas: Evidence of Romanised buildings or 'villas' at Membury and Holcombe, a possible Roman post station or 'Mansio' at Seaton, and the Roman Fort at Axminster with a Romano-British roadside settlement indicate that people eventually accommodated to Roman rule in this area. There has also been evidence of Roman military inside the Scheduled hillfort at Hembury.</p> <p>Castles: Many structures across the district called 'castles' are actually prehistoric Hillforts. Locally there is one genuine medieval motte and bailey castle at Castle Hill in Kilmington, and a moated (ditched defences) manor site at Cowley.</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Concentrations of Scheduled Monuments can be found in many locations (see map 1) near Brampford Speke, , Farway Common, Woodbury Common, and monuments from multiple periods at Killerton Park (from the Iron Age to the 18th Century). .</p>	
2.50	Text additions	<p>The Dorset and East Devon Coast World Heritage Site (also known as the ‘Jurassic Coast’) was the first natural environment designated World Heritage Site in England, and is one of only 17 in England and 31 in the UK. Its 95 mile coastline extends from the River Exe in East Devon to Studland Bay in Dorset. Most of the East Devon part also falls within the East Devon National Landscape. The coast’s exposed sedimentary rocks give a unique insight into 185 million years from the Triassic, Jurassic and Cretaceous periods. The town of Seaton has the unique position of being the only place on the Jurassic Coast where you can view rocks from all three geological periods in their natural environment, with fossil rich rocks to the east, vibrant red Triassic cliffs near the harbour, and white cretaceous chalk at Beer. Further, there are heritage assets present as a consequence of the geology and a result of human interaction with it, for example Exeter Cathedral’s quarries at Dunscombe and Beer, with Beer stone first being exploited in the Roman period for works such as the decorative stonework at Holcombe Roman villa.</p>	<p>Recommendations by Seaton Town Council to celebrate Seaton’s unique position along the Jurassic Coast.</p> <p>Recommendation by DCC HET and DAS to cover East Devons Roman history and use of materials.</p>
Living and Literary Heritage (2.51-2.53)	New Paragraphs	<p>Although not directly relevant to East Devon’s physical heritage, two additional UNESCO designations are important to note, these include the UNESCO City of Literature and the 2003 UNESCO Convention of Intangible Cultural Heritage.</p>	<p>Incorporates recommendations around UNESCO cultural designations, intangible heritage, literature, and heritage crafts and skills provided by Simon Timms and Joseph Watson.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>The City of Exeter was designated a City of Literature in 2019, recognising the significance of the literary heritage in the city and across the county. East Devon has associations with many celebrated literary figures, such as Dame Hillary Mantel and Coleridge, as can be seen in Literary Map of Devon.³¹</p> <p>Living Heritage (also known as Intangible Cultural Heritage (ICH)) is practised and living traditions, knowledge and skills, that can range from boatbuilding to singing, carnivals, dancing and dry-stone walling. As part of the UK’s commitment to the 2003 UNESCO Convention for the Safeguarding of Intangible Cultural Heritage, an inventory of living heritage from across the UK is being set up, with submissions being accepted online³² by organisation and individuals. East Devon has a rich history of cultural heritage, from the Ottery Tar Barrels and Sidmouth Folk Festival to crafts such as Oak Bark Tanning in Colyton, to Lace making and the Hot Pennies ceremony in Honiton. Future community engagement could investigate gaining recognition and inclusion on the list for the living heritage of East Devon.</p> <p>³¹ Literary Map of Devon (Exeter UNESCO City of Literature): 2025+literary+map+web.pdf ³² Welcome Inventories of Living Heritage in the UK</p>	
2.56 and 2.57	Text amendments	In addition to the eight parks and gardens included in the Historic England Register, thirty-one sites are included in the Devon Gardens Trust Local List of Parks and Gardens as important designed landscapes in the local context of Devon. Records are maintained by	Suggested amendments and additions by DCC HET and DAS

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Devon County Council's Historic Environment Team. East Devon does not currently have any Registered Historic Battlefields, although the sites of the Western Rising (or Prayerbook Rebellion) of 1549 at Fenny Meadow, Woodbury and Clyst St Mary relate to events of national importance and so arguably merit consideration.</p> <p>In Theme B the strategy sets out proposals, working with local communities, for the means of establishing and managing a local list of undesignated assets.</p>	
2.61, 2.62 and 2.63	Text additions	<p>This area lies totally within East Devon and mainly in the southern third of the district (see map 1). It was designated in 1963, originating from the East Devon Heritage Coast (non-statutory designation) that can still be found in the south, and covers 103 square miles (32%). The south includes part of the dramatic 'Jurassic Coast' World Heritage site. Inland, large expanses of heathland provide a contrast to woodlands and river valleys in the predominately pastoral landscape. The East Devon Pebble Beds at Woodbury and other commons form the largest single block of lowland heathland west of the New Forest. Steep sided Devon hedge-banks border fields and narrow country lanes, leading to the many villages and hamlets, with many houses and cottages built of local stone, pebbles, thatch and cob. The EDNL has a rich prehistoric archaeological heritage, with the heathland containing numerous funerary and ceremonial monuments.</p> <p>Blackdown Hills National Landscape</p>	Recommendation by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>This area includes land in both Devon and Somerset and covers mainly the north eastern third of East Devon (see map 1). Designated in 1991, the National Landscape is a relatively unspoilt, diverse rural landscape. Stretching from a prominent steep scarp in the north, the area dips gently southward as a flat-topped plateau to Honiton in the South, dissected by spring-lined valleys. Prominent Iron Age hillforts can be found across the National Landscape, including Hembury and Dumpdon. The traditional pattern of villages and hamlets along the valleys remain largely unchanged among some medieval patterns of small enclosed fields and narrow lanes with high hedge banks. Villages, hamlets, individual buildings and their settings form a vital element of the character of the Blackdown Hills, particularly because of the widespread use of chert, a local stone, and the area's well preserved, distinctive architecture. The areas mining and quarrying heritage (iron, whetstones, clay and agricultural marl) has also left a significant legacy, with deliberate planting and natural regeneration of woodland over former extraction sites visible today.</p> <p>Natural Landscapes and Green Infrastructure</p> <p>There are many environments in East Devon that are also protected on account of their biodiversity or geological interest. Whilst typically, heritage considerations or assets would not form part of the reason for their designation, it may be that human management and activity has 'created' the biodiversity or geological interest. There can therefore be heritage interests that overlap the more formal biodiversity or geological interests of their designation. Heritage assets can often form a key part of</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		Green Infrastructure provision, such as green lanes, disused railway lines, field patterns/systems, parks and gardens, churchyards and cemeteries, orchards, and former quarries.	
2.64	Text amendments	<u>Special areas of conservation:</u> These are highly protected sites designated under the EU Habitats Directive to conserve important natural habitats and species other than birds.	Suggested text provided by Devon Wildlife Trust (DWT)
Theme A Objective 3 and Action Plan	Text additions to action	<i>Support and develop a calendar of local heritage events and anniversaries across the district, promote the strategy and website at events</i>	Further development of Action 2 following a recommendation by Joseph Watson.
Theme A Objective 4 and Action Plan	Additional Objective with Actions	<p>4 To integrate environmental and heritage enhancement. Actions:</p> <ul style="list-style-type: none"> • <i>Promote the inclusion of biodiversity considerations, nature recovery and ecological enhancement in heritage management</i> • <i>Conserve, enhance and integrate biodiversity and ecological networks within heritage assets and their settings where appropriate, through informed management and guidance.</i> 	Recommendation by DWT for consideration and integration of biodiversity and nature recovery within heritage protection and conservation actions.
2.72	Text additions	The Council places considerable weight on the importance of protecting the built heritage of East Devon, but it does so with limited resources. As a consequence, the emphasis in Council work has been to undertake regulatory tasks that it is required by law to do (specifically determining planning applications and listed building consent applications), rather than the more proactive aspects of conservation. The council conducts	Recommendation by DCC HET.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		this work, in partnership with Devon County Council regarding access to the Historic Environment Record, and for the provision of archaeological planning advice.	
2.83	Text additions	In addition to this, the Local Plan allocates development sites. Site assessments are undertaken as part of the allocation process to ensure that, in principle, development will not harm important interests including by negatively impacting upon heritage assets or their setting. In some cases development may actually enable better revealing of an asset or better understanding or access to it, particularly if archaeological assessment is required prior to development taking place. Where sites are allocated, development will still need to accord with the policies of the Local Plan and will still require planning permission. In line with national policy ¹ , further archaeological and/or historic building recording, in mitigation for the development's impact, may be required through planning conditions applied to any consent granted. These conditions can lead to additional public and conservation benefits, with evidence and any archives being made publicly accessible, potentially through web-based educational outputs, information panels and excavation open days.	Recommendation by DCC HET.
2.85	Text amendments	. Under section 8 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ² , Listed Building Consent is required for works to demolish, alter or extend a listed building in a way that would affect its	Suggested text provided by H.E.

¹ MHCLG (Dec 2024) National Planning Policy Framework Paragraph 218

² [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>character or appearance as a building of special architectural or historic interest. Alterations must be carried out with the greatest skill and care to ensure that changes are not detrimental to the special architectural and historic interest of the building.</p>	
2.88	New paragraph	<p>As with all planning applications, applicants for Listed Building Consent will need to submit sufficient information for a decision to be made. This may include an assessment of the history and historic fabric of the Listed building or structure and details of the proposed works. Conditions may be applied regarding the recording of any archaeological and historic building interest. Historic England, and other potential organisations such as amenity societies (e.g. Victorian Society, Georgian Group, Twentieth Century Society etc.) as statutory consultees may provide comments depending on the nature of the heritage asset.</p>	Suggested text provided by DCC HET and DAS.
2.94	Text additions	<p>Archaeological heritage is often vulnerable and easily damaged. Development won't be permitted if it would harm nationally designated sites, and that which would harm locally important sites or their settings will only be permitted if the need for development outweighs the damage to the archaeological interest of the site and its setting. Preservation in situ is considered to be the most appropriate means to ensure protection.</p>	Suggested text provided by DCC HET and DAS.
2.95	Text amendments	<p>Any work to a designated monument requires Scheduled Monument Consent, for which applications are made to the Secretary of State for Culture, Media and Sport, with the consulting process administered by Historic England. Preservation in situ is considered to be the most appropriate means to ensure protection.</p>	Suggested text provided by H.E.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.96	Text additions	For any proposed development, the impact on the special character of a registered park or garden must be considered and is a material consideration in the planning process. The setting of a Registered Park and Garden is also a key consideration, with designed landscape views of particular importance. The Gardens Trust is the statutory consultee for works affecting all Registered parks and gardens, whilst Historic England will be consulted for all that are Grade I and II* listed.	Recommendation by DCC HET and DAS.
2.98	Text amendments	A feature of local interest can take the form of a building that that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more criteria, such as age, rarity, historic association or aesthetic value. This also applies to parks and gardens of high local importance, and to significant archaeological sites, such as flint scatters, historic field systems and settlement sites that may be visible above ground, or may only survive below ground, such as sites recorded as archaeological cropmarks.	Suggested text provided by DCC HET.
2.101 and 2.102	New paragraphs	It is important to note that the local list is not an exhaustive list of all undesignated heritage assets. Many more assets, such as those found on the Historic Environment Record (HER), are also protected by national planning policy and Local Plan policies. The Local List is a dynamic subset that have been identified as being of particular importance to the community and will likely grow as awareness of the list grows and individuals, groups and organisations submit additional assets.	Suggested text provided by DCC HET and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>The HER was created by the Devon Archaeological Society (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 1979. Sites on the HER may be of lesser, equal, or greater significance than sites that are on the Local List.</p>	
2.103	Text amendment	<p>Designated heritage assets may be classified as 'at risk' due to negative changes through neglect, inappropriate development, agricultural and forestry activity, crime or damage and can reflect or impact on an area's social and economic decline.</p>	Recommendation by DCC HET.
2.104, 2.105, Table 3 and 4	Text amendments (updated using most recent Historic England data)	<p>Whilst most designated heritage assets of East Devon are in good or reasonable condition, a small proportion are classed as 'at risk.' There were no Conservation Areas at risk as of January 2026, in comparison with 6% across England in 2017.</p> <p>From the Historic England Heritage at Risk register 2025, which includes Grade I, Grade II*, Grade II Places of Worship and Scheduled Monuments there are 25 listed items defined as being at risk, an improvement on the 46 recorded in 2018 and considerably better than the national picture:</p>	H.E. provided a link to the most recent Heritage at Risk register data (2025).

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>45 are Grade I: 2 Listed Buildings, 13 listed Places of Worship and 1 Registered Park</p> <p>2 are Grade II*: 1 Listed Building and 1 listed Place of Worship</p> <p>1 is Grade II: 1 Place of Worship</p> <p>18 are Scheduled Monuments</p> <p><i>Table 3: East Devon Heritage Assets at Risk Grading, 2023-2025 (Historic England Website⁴¹, March 2024/January 2026)</i></p> <p>2 are category A: Immediate risk of further rapid deterioration or loss of fabric; no solution agreed: Church of St Lawrence (Grade I) and Poltimore House (Grade II*); the former is owned by a religious organisation, the latter is not in use and is owned by a heritage charity.</p> <p>4 are category C: Slow decay; no solution agreed: 2 are the Tithe barn and stable at Bishop's Court, Clyst St Mary (Grade I) and privately owned, the other 2 are Grade II* and Grade II churches</p> <p>1 is category D: Slow decay; solution agreed but not yet implemented: This is a Grade II* church</p> <p>The remaining 10 assets at risk do not have a priority grading</p> <p>Of the 25 assets at risk, 2 are noted as improving in condition, with 4 recorded as stable. Overall the situation has improved but a number of scheduled ancient monuments remain at risk of deterioration due to factors outside the planning system, such as coastal erosion and faring practices, with barrows being at particular risk from agricultural intensification and plant growth. Historic England do not monitor Grande II listed buildings at risk unless they are ecclesiastical buildings.</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.109	Text amendments (and removal of most of the previously numbered 2.100 paragraph)	<p>.</p> <p>Historic England does not monitor Grade II listed buildings, unless they are places of worship., however, a programme of monitoring buildings at risk in East Devon could help to identify patterns or trends and would be a valuable resource to help the council manage the most vulnerable assets. A programme could be established for communities to help assess the condition of Grade II buildings in their local area, setting priorities within conservation areas, for example.</p>	Recommendation by H.E. due to lack of evidence over the condition survey being a current programme.
2.111	Text amendment	The National Landscape Partnerships have been actively involved in managing Scheduled Monuments at risk. East Devon National Landscape has been working on improving the condition of six at-risk assets with the help of volunteers.	Recommendation by DCC HET to remove out-of-date reference.
2.113	New paragraph	Under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the council has a statutory duty when managing conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising planning functions.	Recommendation by DCC HET.
2.131	Text additions and links in footnotes 41 and 42	<p>Design guides and other advice can be made more widely available and accessible to developers, residents, local businesses and local communities in general (including the Strategic Stone Study⁴² and Historic England’s Buildings Stones of England: Devon⁴³).</p> <p>⁴² Strategic Stone Study: A Building Stone Atlas of Devon</p> <p>⁴³ Devon. Building Stones of England</p>	Recommendations by DCC HET and the Jurassic Coast WHS (Hosted by Dorset CC).
2.132	New paragraph	The Devon RIGS group may also be able to help with identifying stone quarries in the area. It should be noted that some old stone quarries are	Suggested text provided by the Jurassic Coast WHS (hosted by Dorset Council).

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		geological SSSIs but this does not bar future extraction of stone for building conservation use, as it can be of benefit to the SSSI.	
2.133	Text additions	The development of agricultural buildings in remote areas, where the need for large scale storage facilities is increasing, needs to be handled sensitively due to possible visual impacts on an historic landscape. The re-use of redundant farm buildings also needs to consider and safeguard the existing character of the historic environment. It is likely that renovations and works on farmstead will encounter archaeology within or adjacent to it, as although some farmsteads may not be outwardly ancient, they may have originated from the medieval or post-medieval period, with historic fabric possibly contained within un-listed buildings.	Suggested text provided by the DCC HET.
Theme B Summary and Action Plan (Theme B – local list action 3)	New action	<p><i>Local list:</i></p> <ul style="list-style-type: none"> ■ <i>Publicise the Local List Guide for East Devon,</i> ■ <i>Receive and consider local list submissions</i> ■ <i>Work with the Devon Gardens Trust to adopt assets from their Local List of Parks and Gardens of Historic Interest into the East Devon Local List of Undesignated Assets.</i> 	A currently ongoing action within the planning and conservation teams, also recommended by DCC HET.
2.143	Text addition	In East Devon, tourism and the visitor economy are important contributors to the vitality and vibrancy of the district's coastal and market towns and our rural communities. In turn, the traditional buildings, historic landscapes, and accessible archaeological monuments of East Devon form a vital part the tourist appeal.	Suggested text provided by the DCC HET.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.145	Text amendments	It is estimated that in 2022 the total value of tourism to East Devon local economy was £311.784 million, nearly 64 million more than the previous year, indicating a positive trend. Whilst more recent East Devon figures are not available, national trends would suggest that this positive trend has continued, with 7 out of 10 of the most popular paid visitor attractions in England being heritage attractions, 35% of UK citizens holiday destinations being influenced by the presence of cultural heritage and spending per trip on day trips now almost doubling pre-pandemic levels.	More recent data around tourism in East Devon provided by the Economy team to update the statics quoted in the strategy.
2.153	New paragraph	In addition to the built fabric of historic buildings, working with the historic landscape should be an important part of Local Nature Recovery (see: Natural England Guidance - Nature recovery and the historic environment) and will be one of the wider benefits of the forthcoming Devon Local Nature Recovery Strategy. Tree planting – for climate and biodiversity, can work with heritage, to restore historic landscapes (e.g. historic parks and gardens), restore traditional orchards, enhance the setting of Listed Buildings, while avoiding un-necessary harm to archaeological sites.	Suggested text provided by the DCC HET.
2.173	New paragraph	The ambitions of the Heritage Strategy and Local Plan run in parallel to and in collaboration with the councils Tourism Strategy to build on the cultural tourism opportunities across the district.	Recommended by the Culture and Economy teams to recognise the importance of heritage and the historic environment in the council's wider strategy for tourism.
2.180 (Discovering Dunkeswell Abbey)	Text amendments	Example: Discovering Dunkeswell Abbey (2018-19) .The Scheduled Monument of Dunkeswell Abbey is an historic ruin that was previously on the Heritage at Risk Register but has since been removed from this list. A series of activities has been completed, with	H.E noted that the previous case study was out of date, with Dunkeswell Abbey now no longer on the Heritage At Risk register. The paragraph has been rewritten, covering the work that has

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>stabilisation works in 2016, along with earthwork and river surveys, excavations, community engagement and tours run as part of the 'Discovering Dunkeswell Abbey' Project by Heritage Arts People CIC in partnership with the Blackdown Hills AONB from 2019-2020. This project was funded through the National Lottery Heritage Fund, with additional funding from Devon County Council and the Blackdown Hills AONB, with support from Historic England and the Dunkeswell Abbey Preservation Trust.</p>	<p>been completed by many teams and partners to achieve this.</p>
2.187	Text addition	<p>Some Neighbourhood Plans will also allocate sites for development and it is essential that local heritage assets, and their setting, are properly taken into account in this process. Early conversations with the Council's Neighbourhood Planning Officer and Historic England can help to raise the awareness of sensitivities regarding heritage assets and guidance will be produced to assist in identifying, and taking account of, the significance of heritage assets when allocating sites for housing development. Devon County Councils Historic Environment Team are also actively supporting Neighbourhood Plan groups, providing Historic Environment Record information, guidance and commenting on draft plans.</p>	<p>Recommendation by DCC HET.</p>
2.188	Text amendment	<p>There are many sources of information available and training for groups and individuals to participate in managing their local heritage. Publications such as 'The Building in Context Toolkit', 'Placecheck' and 'Understanding Historic Places' provide useful guidance from Historic England, whilst the Oxford Toolkit is a recommended guide on how to undertake a conservation area character appraisal. A Smartphone App</p>	<p>Recommendation by H.E to refer to the most up-to-date guidance and toolkits available.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>'Rate My View' is currently available for communities to record local points of interest. Devon County Council's Historic Environment Viewer and Heritage Gateway provide much information.</p>	
2.196	Text addition	<p>Working with this department we can help to identify heritage-led regeneration projects that will have social, economic and environmental benefits through, for example, improving tourist and town centre sites that are run down. Heritage has an important role to play in place-making and this may be part of a much wider programme working with other partners in the public and private sector. The Economic Development Strategy looks at the wider benefits to local communities and businesses where Heritage projects can play a part.</p>	<p>Recommendation by the Economy team, showing the link between the goals and objectives of the Heritage and Economic Development strategies.</p>
2.209	New paragraph	<p>Although no East Devon towns were included in the project, Historic England's 'High Streets Heritage Action Zones' (running from 2020-2024) is a recent example of the power of community engagement, cultural events and smart reuse of derelict and heritage assets to boost the economy and vitality of our high streets.</p>	<p>Recommendation by H.E to identify recent initiatives.</p>
2.213	New paragraph	<p>The towns of Exmouth, Honiton and Seaton have had Historic England/Devon County Council historic character surveys carried out between 2012 and 2016 as part of the Devon Historic Market & Coastal Towns survey.</p>	<p>Suggested text provided by the DCC HET.</p>
2.222	New paragraph	<p>Other potential sources of funding through DEFRA include the environmental stewardship schemes, natures recovery schemes and woodland grants, as these can all contain heritage components.</p>	<p>Suggested text provided by the DCC HET.</p>

Para or Section of updated strategy	Changes	Revised text	Reason for changes
2.223 (Arts Council England)	New paragraph	<p>Arts Council England Arts Council England are the national development agency for museums in England. Arts Council England champion, develop and invest public money from the government and the National Lottery to help develop museums for as many people as possible across the country.</p>	Additional source suggested by the Economy and Culture teams within the council.
Action Plan Theme A – Partners	Text additions	Policy staff to circulate information, Help from partner organisations such as DCC HE Team	Suggested by the DCC HET team to ensure partners work with the HET, especially around the Historic Environment Record.
Appendix 3	Further partners and organisations added	<p>Partners East Devon National Landscape Blackdown Hills National Landscape Devon and Cornwall Police Devon County Council Devon Tourism Destination Marketing Organisations (DMOs) Historic England Jurassic Coast WHS – Dorset Council and Devon County Council Museum Development South West (MDSW) National Churches Trust National Trust East Devon Neighbourhood Planning Groups & Parish Councils Pebblebed Heaths Trust (Clinton Devon Estates)</p> <p>Local History Organisations Axminster Historical Society Axe Vale and District Conservation Society Axe Valley Heritage Association</p>	Recommendations for amendments and additional organisations from multiple respondents.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Branscombe Project Broadclyst Local History Society Chardstock Historical Record Group Colyton Parish History Society Devon Archaeological Society Devonshire Association Devon Gardens Trust and Devon Gazeteer Devon Historic Buildings Trust Devon Historic Churches Trust Exmouth Civic Society Exmouth Historical and Archaeological Society Feniton History Group Hawkchurch History Society Honiton History Society Lympstone History Society Membury History Society Newton Poppleford Local History Group Otter Valley Association Ottery St. Mary Heritage Society Sidmouth Local History Group Sid Vale Association The Devonshire Association Whimble History Society Woodbury Local History Society</p> <p>East Devon Museums and Heritage Centres include: Allhallows Museum, Honiton Axminster Heritage Centre Axe Valley Heritage Museum, Seaton Colyton Heritage Centre</p>	

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>Dunkeswell Airfield Heritage Centre Exmouth Museum Fairlynch Museum, Budleigh Salterton Sidmouth Museum Upottery Airfield Heritage Centre Whimble Heritage Centre</p>	
Appendix 4 Glossary	New appendix added to provide an explanation of terminology used throughout the document.	<p>This glossary is intended to assist readers by explaining how specific terms have been applied in the context of this Heritage Strategy. The glossary does not provide a definitive legal definition of terms, and readers should refer to legislation and national planning guidance for a full picture.</p> <p style="text-align: center;">Archaeology</p> <p>The NPPF (dec 2024) notes that a heritage asset is of archaeological interest “<i>if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point</i>”. Historic England applies the term to built, buried, waterlogged and dispersed assets, whether designed or not, informed by the NPPF definition⁶¹.</p> <p style="text-align: center;">Built Historic Environment</p> <p>As distinguished from natural landscape features, the built historic environment refers to man-made aspects of our surroundings. This can refer to a range of features including, but not limited to, buildings and structures, pathways, monuments and ruins, industrial and post-industrial landscapes etc.</p> <p style="text-align: center;">Cultural Landscape</p> <p>As defined by UNESCO, Cultural Landscapes represent a combination of both natural and built features, being illustrative of the evolution of human society</p>	Recommendation by DCC HT and DAS.

Para or Section of updated strategy	Changes	Revised text	Reason for changes
		<p>and settlement over time under the influence of the physical constraints and/or opportunities presented by their natural environment and social, economic and cultural forces. Three types have been identified; landscapes designed or created by man, organically evolved landscapes, and finally associative cultural landscapes.⁶²</p> <p style="text-align: center;">Heritage</p> <p>A heritage asset is defined 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.</p> <p style="text-align: center;">Historic Environment</p> <p>The historic environment results 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. The Historic Environment Record is a collection of information that provides the public with comprehensive and dynamic resources relating to the historic environment of East Devon.</p> <p>⁶¹ Definition within paragraph 2 (p.1) of: HEAN 17 Planning and Archaeology</p> <p>⁶² World Heritage Centre - Cultural Landscapes</p>	

Additional Feedback

Some of the feedback we received was either not directly related to the Heritage Strategy or did not result in any changes being made to the strategy document. The following table lists the comments that are relevant for the Committee, and our response or recommendations if required.

Respondent	Para or section of strategy	Additional Feedback	Response <i>(if appropriate)</i>
Historic England	p.4	We welcome the commitment to the participation of local communities in understanding, enhancing and positively managing heritage. The Council's work to date in prioritising, funding and drawing up templates for reviews of conservation areas is particularly noteworthy.	
Historic England	Local list of undesignated assets	We welcome the commitment to maintaining a list of non-designated heritage assets. Our recent consultation (closed 2 January 2026) on a revised Historic England Advice Note 7 (third edition) on local listing, and the subsequent guidance when published, may assist the Council in further refining its procedures: https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/	The local listing process may be reviewed and revised following the publication of the finalised guidance.
Historic England	Working with communities	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 current financial strictures. We support East Devon's agenda that maximises community engagement and promotes the community's ownership of their heritage. Clearly there will remain a role for local authority heritage experts and other conservation professionals to guide, review and validate the outputs of this work.	
Historic England	p.36	We note the suggestion that Local Plan site allocations are supported by site assessments to ensure that they do not harm heritage assets. While we would stress that avoiding and minimising harm should be the starting point, unfortunately there are a number of site allocations in the emerging East Devon Local Plan that could result in considerable harm.	Local plan work is out of scope of this document. All feedback received during the first and second Regulation 19 consultations will be considered for allocation within the LP.

Historic England	p.43 Reviewing conservation areas	We welcome the commitment to a programme of review of Conservation Areas as it appears from the preceding paragraph that many have not been updated for 15-20 years.	Work currently ongoing.
Historic England	Design and the built heritage	Chapter 12 of the NPPF Achieving well-designed places, paragraphs 133-134, promotes the use of design guides and codes to provide a 'local framework for creating beautiful and distinctive places'. We therefore suggest that the Council reconsiders its decision not to prepare an East Devon Design Guide (or guides and codes for local areas). National guidance does not provide the level of local nuance and specificity that is desirable to steer development and provide clarity to developers on the local context and design preferences.	Detailed master planning and design guidance will be prepared for Marcombe, with other design codes/guides likely to be produced for local areas or to cover specific matters where it is deemed necessary and resources permit. Neighbourhood Plans may focus on design where they consider it to be particularly important. When the updated NPPF comes into force, it may be necessary to produce further local design guidance to ensure particularly important characteristics or areas of East Devon are adequately protected (within National Landscapes for example).
Historic England	Theme C	We welcome much of the content of Theme C, which offers a broad and helpful guide to a range of measures that may be undertaken to heritage assets to harness their benefits to the environment and society, including the sensitive retrofit of historic buildings. The identification of potential benefits of linking heritage enhancements with policy areas such as economic development and regeneration is also helpful.	
Devon County Council Historic Environment Team	2.115-2.121	Proposed Actions and Theme B Summary – Could include action to work with DCC as Mineral Planning Authority to identify and permit sustainable sources of local building stone.	Links to useful sources such as the Strategic Stone Study and Devon Buildings stones have been added under 2.131. We note the potential to work with DCC for the permitting of sustainable sources of building stone in the future.

<p>K Williams (<i>Norman Lockyer Observatory Society</i>)</p>	<p>N/A</p>	<p>I am not sure where my comments would sit as the Norman Lockyer Observatory does not appear on any of your heritage lists, nor indeed on a map of sites of interest in East Devon. As a private individual I am horrified and worried about the future of the Observatory. As a director of the NLO I am uneasy about the proposed Community Asset Transfer for which we are currently preparing a business plan.</p> <p>Sir Norman Lockyer, discoverer of helium in the sun, and founder of the journal 'Nature' retired to Sidmouth in 1912 to land belonging to his second wife Mary Browne - her sister is remembered by a bridge in the Byes. Both Mary and her sister were renowned suffragettes, with much information held in the Sidmouth Museum. The archives at the NLO contain a wealth of lantern slides, documents, and other artefacts relating to Sir Norman, the Maclean family, and a complete set of 'Nature'. Running the site as an active resource in the manner in which it was intended would bring in many more visitors and revenue to the area. The historic telescopes, one of which belonging to Sir Norman, are working - so it is definitely not a museum, but a living resource. Visitors and students are particularly taken with the working Victorian telescopes, which could be used for current observations. Prof Tim Naylor and his team of astrophysicists at the University of Exeter are keen to look at the historic observations with a view to understanding how historic telescopes were used, as well as using historic data relating to gamma Cassiopeia which is still being studied for its unusual variability. I very much hope that the Norman Lockyer Observatory along with recognition of Sir Norman Lockyer and Mary Browne will be included as part of your long term vision for the area before heading down the CAT route which is unpredictable and dependent upon sufficient volunteers to run it. The site is worthy and would quickly repay, of paid staff who would have time and</p>	<p>This issue is out of the scope of the Heritage Strategy. Further discussion will be required with the respondent and potentially others involved with the NLO to better understand the situation and to consider what actions can be taken to resolve this matter.</p>
---	------------	---	---

		expertise to source funding and to open the site more often to visitors.	
East Devon Excellence	Theme: Widen Knowledge of the heritage of East Devon and its assets	What is the strategy to do this? East Devon Excellence has a website encouraging visitors and local to make the most of the region, it would make sense to promote places of interest on this site and via our social media channels	Potential work to be carried out in partnership with other teams within the council.
Otter Valley Association	Section 1 and 3 and Action Plan	This is a well written and useful document. We benefitted from the 2019 pilot held in East Budleigh, which helped produce the Conservation Area Appraisal. More of this work should be done, using the community. In times of local government cutbacks the area of conservation work is very under funded. Innovative ways of addressing heritage at risk and other heritage issues is required. Working with and harnessing the enthusiasm of local communities is one way of helping with this situation, and the lack of resources.	
Otter Valley Association	General	The Otter Valley Association considers this strategy to be a very useful document, building and improving on the previous strategy. East Devon is rightly famous for its fine heritage, which is of great importance, and must be preserved. Any document that helps with the understanding of our heritage, and how to preserve it is of great value to both heritage owners, builders and professionals, the community and the general public	
Seaton Town Council	General	It is disappointing to see that no celebrations are so far planned to celebrate the 25th anniversary of the inscription of the Jurassic Coast as a World Heritage Site being that it is the only Natural World Heritage Site in England and Seaton being the only place on the Jurassic Coast where you can see rocks from all three of the World Heritage Site's geological periods.	The council has been made aware of the 25 th anniversary. Events are out of the scope of this document and the planning team.

<p>Exmouth Town Council</p>	<p>General</p>	<p>However, to realise the Strategy’s aims fully, it is important that this community-led heritage evidence is consistently reflected in the emerging Local Plan, especially in relation to:</p> <ul style="list-style-type: none"> • Landscape protection policies Neighbourhood Plans often contain fine-grained, locally informed assessments of natural landscape character, tranquillity, views and settlement pattern. These should directly inform (and not be overridden by) district-level policies designed to protect valued landscapes, heritage settings and rural edges. Where Local Plan proposals—such as settlement boundary amendments or site allocations—affect sensitive landscapes identified in Neighbourhood Plans, the Strategy should reinforce the need for early dialogue, shared evidence and the protection of distinctive local character. • Housing targets and growth pressures While the Local Plan must accommodate housing need, the Strategy should clarify that heritage and landscape sensitivity must be a fundamental constraint in shaping growth options. Community-generated evidence in Neighbourhood Plans can help ensure that housing distribution respects historic settlement form, avoids erosion of important landscapes, and prevents cumulative harm to heritage setting. Aligning the Strategy with the Local Plan’s growth strategy will help maintain the balance between meeting housing requirements and safeguarding East Devon’s unique heritage and landscape qualities. 	<p>Local plan work is out of scope of this document. All feedback received during the first and second Regulation 19 consultations will be considered.</p>
<p><i>Joseph Watson</i></p>	<p>Section: various Paragraph: 2.9 and throughout Theme: B – Positively</p>	<p>Church buildings as community heritage assets</p> <p>Comment: Historic church buildings are often among the most significant heritage assets in East Devon’s towns and villages and frequently hold irreplaceable community histories and act as the largest community gathering space within their contexts.</p>	<p>Minor changes made to strategy document. Work with at risk heritage assets and conserving listed and non-listed heritage assets is a continual process, and mechanisms exist such as ‘Community Asset Transfer’ and ‘Assets of Community</p>

	<p><i>managing our historic environment</i> <i>Action: various</i></p>	<p>The strategy does not adequately reflect the risks to these buildings within the plan period. Demographic trends suggest these buildings will face acute pressures relating to maintenance, capacity for upkeep, and long-term viability, with some 5% of churches facing possible closure in the period 2026 to 2030 (ref. https://www.nationalchurchestrust.org/survey). Unmanaged decline could lead to closure, loss of access, or disposal in ways that reduce public benefit and community connection irretrievably, and impact East Devon’s tourism economy.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Work with relevant partners including the National Churches Trust, Devon Historic Churches Trust, Church of England (Diocese of Exeter) and other denominational representatives, to develop an early warning and prioritisation approach, supporting better visibility of vulnerable buildings and the likely timescales of risk. Support the development of partnership frameworks and community support groups (ref. Friends of St Andrew’s Colyton (FoStA)) for sustainable use, recognising the importance of continued community access and appropriate new or shared uses where needed. • Provide clear signposting to funding routes, expertise and good practice, and support coordination where this helps prevent avoidable deterioration and loss of heritage value. • Ensure that consideration of church buildings as heritage assets is appropriately reflected in EDDC’s approach to heritage at risk, planning and community wellbeing, noting that the importance of these buildings is often not adequately reflected through the Listing process. 	<p>Value’ to provide communities with additional powers. However, the complex church ownership and funding models will make this work difficult to achieve with limited resources.</p>
--	--	---	--

<p>Joseph Watson</p>	<p>Section: Various Paragraph: 1.8, 3.15, 2.196, 2.197 Themes: A and C Action: Various</p>	<p>Heritage crafts and traditional skills are a distinctive part of East Devon’s living</p> <p>Recommendations:</p> <ul style="list-style-type: none"> ☑ Work with partners including the Crafts Council and Heritage Crafts to develop a clearer picture of heritage crafts and skills present within EDDC, including the risks and opportunities associated with sustaining them as viable livelihoods. ☑ Support place-based pilot activity that improves understanding of craft-as business and its role in local economies, including low-cost interpretation, trails and coordinated “open” moments that can increase dwell time and local spend. ☑ Encourage partnerships that connect craftspeople with education, volunteering and learning pathways, where feasible, in order to strengthen visibility and intergenerational transfer of skills. ☑ Ensure that practical barriers to the sustainability of small craft enterprises are understood and, where possible, reduced through signposting, brokerage and alignment with town centre and economic development priorities. 	<p>The recommendations are considered to fall under the remit of the Cultural strategy, rather than the planning policy team. Crafts, skills and intangible heritage have now been noted within the Heritage Strategy at multiple points, including the ‘<i>living and literary heritage</i>’ paragraph, and the links to the Cultural strategy have been explained. However, it is not considered appropriate to insert these actions within the Heritage Strategy action plan produced by the Planning Policy team.</p>
<p>Simon Timms</p>		<p>Your updated Strategy is very much to be welcomed. It highlights the richness and diversity of East Devon’s heritage and will be beneficial in ensuring that this heritage is recognised in future deliberations about establishing unitary local government in Devon. very much support the Strategy’s</p>	

		aims as set out in para 1.48, particularly its focus on taking a partnership approach and involving communities.	
Simon Timms	Historic Churches:	I suggest that greater emphasis is placed on the outstanding heritage represented by the District's historic places of worship. Churches are shown in some of the illustrations and get some mentions (eg in para 2.9) but I feel they deserve more recognition for their heritage significance. A high proportion of East Devon's 240 Grade I and Grade II* listed buildings are churches/chapels and they have a key role in community life. I suggest that the Church of England, as the owner responsible for so many historic churches across East Devon's 70 + parishes, should be included alongside the National Trust and others in your listing of Key Organisations in paras 1.50 - 1.65. Perhaps it could replace the Jurassic Coast Trust in para 1.64 and Appendix 3 as that organisation no longer exists to manage the WHS.	Diocese of Exeter (C of E in Devon) added to appendix 3. As explained in our response to Joseph Watson's ' <i>Church buildings as community heritage assets</i> ' feedback above, further work will be difficult to achieve.