

Appendix 6 – Exmouth sites assessment of sustainability and suitability

The assessments below consider how the potential new sites around Exmouth meet or do not meet with relevant policies of the East Devon Local Plan (2013-31) and where relevant* the Lypstone Neighbourhood Plan. It should be noted that this is a *basic* sustainability and suitability assessment and does not prejudice the formal consideration of any submitted planning application taking into account the comments and views of any statutory consultees, interested third parties, policies of the Local Plan (and other policy guidance) or the views of the Service Lead – Planning, Development Management Committee or the chairman of DMC. It is intended to be a guide to help determine which are the most appropriate sites to deliver sports pitches on taking account of the main policy issues that exist.

Policies are only considered against sites where they are considered relevant / apply at this stage. Other policies and material considerations may also apply and just because this assessment does not refer to them does not mean that they would not apply. For instance, once more detailed plans are produced for any site, more detailed design policies such as D1 and D2 of the Local Plan will become more relevant and so are not considered at this stage.

At this stage it is not envisaged that this strategy would require a full Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) or Environmental Impact Assessment (EIA). This basic sustainability and suitability assessment is not intended to be a replacement for these processes, however, it clearly considers the most sustainable and least harmful way to deliver the required sports pitches for Exmouth. So long as the recommendations of this strategy conform with the policies of the Local Plan (and this assessment considers this for each site) then it is considered that they would effectively be covered by the SA for the Local Plan. It may be that individual site plans and projects would need to be subject to SEA/EIA at the planning application stage.

A basic sustainability and suitability assessment has not been carried out for existing sports pitch sites in the town as generally it is considered to be more sustainable and suitable to retain them for use as sports pitches than to provide replacement facilities elsewhere.

*Where sites are located within the Lypstone Parish Council administrative area the Lypstone Neighbourhood Plan forms part of the development plan alongside the Local Plan and material considerations.

St. John’s Road (E1)

Site ref	E1	Site name	St. John’s Road
Highways comments	The sites current existing access is pedestrians only. The bus stop and shelter would need to be relocated as both of these would cause an obstruction.		
Archaeology comments	No anticipated archaeological impact.		
Landscape comments	Due to its urban context, already existing playing pitch use and already established buffer planting the delivery of sport pitches on this site would have negligible adverse landscape and visual impact, with the only minor issues being relative to local amenity of residents close by. Careful consideration should be given to the siting of the pitches and the design of the boundaries with adjoining neighbours to limit the impact on these residents.		
Arboricultural and ecological comments	Floodlighting to negatively impact on bats would need to consult English Nature. Badgers will impact on any ground works within minimum 20m of set. Minimum 10m buffer zone around wooded area or mature crown spread plus 5m whichever is larger.		
Strategy 3 – Sustainable Development	<p><i>Conserving and enhancing the environment</i> – Site E1 is within the urban area of Exmouth and would therefore minimise harm to biodiversity and the quality and character of the landscape so long as the local impact on bats and badgers is considered. Sports pitch drainage would need to drain into the Withycombe Brook, presumably feeding in to any drainage system developed for the housing site which has permission immediately to the south of the site. The site is an existing playing field that is underutilised due to its condition and lack of facilities. Re-use of the site for formalised sports pitch use would reduce the burden for new Greenfield sites.</p>		
	<p><i>Prudent natural resource use</i> – The location of site E1 would discourage travel by vehicular transport (be that car or bus) and would encourage walking and cycling to the site thereby reducing reliance on fossil fuels and carbon emissions. There is a bus stop directly outside the site (which may need to be relocated to get access). Limited car parking would still need to be provided. New clubhouse/changing facilities would need to be provided for the site.</p>		
	<p><i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle within the fabric of the town could be considered to have better social wellbeing outcomes. The site is currently used for informal kickabouts and in this case this use would need to be allowed to continue in this location. The site is also used by dog walkers however there is a dog exclusion area in place already which means that technically they should not be. If formalised pitches were installed then that dog ban would need to be respected and enforced.</p>		
	<p><i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of rugby pitches on site E1 could enable all of Withycombe Raleigh’s natural grass pitches to be located in one place within the town and not too far from their existing home ground at Raleigh Park (assuming that is converted to a 3G AGP), minimising maintenance costs and transport costs and encouraging use of any social facilities provided as part of a new clubhouse.</p>		
	<p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the ease of access to any facilities delivered on this site would be preferable.</p>		
Strategy 4 – Balanced Communities	As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches		

	delivered in the heart of the community could have a better outcome in creating a balanced community.
Strategy 5B – Sustainable Transport	Site E1's location within the town enables users to access the site by foot, bike and public transport (bus stop directly adjacent to the site), reducing the need to travel by car. Some users will still need to access the site by car and provision of formalised sports pitches will inevitably lead to an increase in vehicle movements. Comments from the local highways authority state that the only issue here would be the need to relocate the existing bus stop immediately adjacent the site entrance.
Strategy 6 – Development within Built-up Area Boundaries	Provision of formalised sports pitches and associated facilities on this site would be compatible with the character of the site and its surroundings, would help to reduce unacceptable pressure on existing services (sports pitches), would not adversely affect flood risk or coastal erosion, would not impair highway safety or traffic flows and would not prejudice the development of an adjacent site. So long as pitches are designed and implemented appropriately then there would be no damage to wildlife, landscape, townscape or historical interests. Delivery of formalised pitches would not lead to a loss of recreational land but community use of the site for kickabouts and dog walking would need to be allowed to continue otherwise this loss might be a loss that would need to be mitigated.
Strategy 22 – Development at Exmouth	Sports pitch development in this location would go some way to meeting the needs for new social, community and leisure facilities and would avoid harming the Exe Estuary wildlife and habitats. Careful design and implementation of plans for the site would be needed to ensure no harm to existing bat and badger populations around the edges of the site and in the adjoining woodlands. Delivery of pitches here would not impact directly on the Exe Estuary as it is a good distance from the estuary. However, it is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site E1 is within the wider Sidmouth and Lyme Bay Coastal Plateau Landscape Character Area though shows little in the way of the distinctive characteristics associated with this character area. The site is located within the Urban Landscape Character Type for Exmouth which reflects the fact that the landscape is seen in the context of the town. Delivering additional sports pitches in this location would protect other more sensitive landscape areas (including but not limited to the AONB) from potentially inappropriate change.
Strategy 47 – Nature Conservation and Geology	Bat and badger presence on site and in the adjoining woodland will need to be respected in the design and implementation of any plans for this site. Floodlights would be unlikely to be approved due to the negative impact they would have on bats. That means that it is unlikely that this is a suitable site for a 3G AGP.
D3 – Trees and Development Sites	The adjoining woodlands to the east of the site are subject of an area TPO however this does not extend into the site itself. Consultation with the Council's arboricultural officers has highlighted the need for at least a 10m buffer area around the wooded area forming the southern and eastern boundaries of the site. The youth 9v9 pitch as shown on the STRI potential plans could have some potential impact on the woodlands to the immediate south of the pitch. This impact should be avoided or minimised as much as possible.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council's Historic Environment team has highlighted that there would be no anticipated archaeological impact.
EN13 – Development on High Quality Agricultural Land	Site E1 is designated as "urban" in terms of agricultural land grading. That being the case this policy is not directly relevant, though clearly delivery of sports pitches in this location could avoid the need to use high quality agricultural land.
EN14 – Control of	Sports pitches must be maintained and this may include occasional use of

Pollution	pesticides, however this would be in small doses perhaps once a year. The STRI Stage 1 report highlights that the site has a high concentration of weeds (clover,daisy and buttercup). This may mean that initially more weed control is required. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution. If the site is used for grass pitches then this is likely to be restricted to weekends and perhaps one or two nights per week, however if it is chosen for the location of a 3G AGP then it will likely be in use most days and evenings. As an existing playing field it is reasonable that it is used as such and potentially usage restrictions could be enforced on any planning permission should this be necessary to mitigate local amenity impacts. Floodlights would not be intended to be installed on the site if it were to host just natural grass pitches so usage would never extend too late into an evening in that situation, however, floodlights would be required for a 3G AGP and usage would likely be required to extend until around 10pm. The amenity impact of floodlights is likely to be able to be mitigated, however the impact on bats and other wildlife known to be present on or near the site would be difficult to mitigate.
EN16 – Contaminated Land	Site E1 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site E1 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.
RC2 – New Open Space, Sports Facilities and Parks	Site E1 is an existing playing field site and so technically Policy RC2 is not relevant, however, formal sports pitches would be a different open space use to that which currently exists so it is still useful to consider the site against the criteria in the policy. To protect the physical amenities enjoyed by adjoining residents the site would need to remain available to the local community as a publicly accessible playing field (rather than being closed off and available only to club users). Any built facilities would have to take account of the character and appearance of the area. The site would be easily accessible by public transport, bicycle and foot. Car (and cycle) parking would continue to be required despite the site’s location within the main urban area, not least to cater for away teams. Provided that the existing bus stop can be relocated then the existing site access would be suitable. Otherwise, there may be potential to gain access to the site via the proposed new housing development access in the south-west corner of the site but this could be explored through more detailed plans in the future if necessary. The local road network can safely accommodate the increase in traffic. Delivery of pitches here would negate the need to use high quality agricultural land, site more sensitive to natural, biodiversity or landscape change, or of archaeological or historic interest.
RC5 – Community Buildings	The site lies within the Built-up Area Boundary and as such this would be a suitable location for a new community facility.
RC6 – Local Community Facilities	Any clubhouse building will need to be designed compatible with the character of the site and its surroundings, located close to existing development most likely on the upper plateau adjacent the Humphries Park development. It will be accessible by a variety of transports types including public transport, walking and cycling and traffic could be accommodated on the local road network. The site is an existing playing field, sport associated noise will generally be acceptable during daylight hours. Usage of the clubhouse facility may need to be restricted to avoid detrimental impact through noise pollution.
RC7 – Shared Community Facilities	Any new clubhouse facility would need to be available for use by other community groups.
TC2 – Accessibility of	Site E1 is well located for access by public transport, bicycle and foot. It is

New Development	well related to the urban areas from which users will travel and so will minimise the need to travel by car as much as possible. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	The site is easily accessible by public footpaths along St. John’s Road and assuming the housing site immediately to the south is developed then this include a footbridge across the Withycombe Brook linking the site to more users on the southern side of the stream.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has raised the issue that the existing bus stop would need to be relocated if the site were accessed through its current field access. Alternatively access could be secured via the proposed new road for the housing site immediately to the south of this site. No concerns were raised over the adequacy of the local road network.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site is its location which should minimise travel by car there will inevitably be a need to accommodate some car parking. Guidance from Sport England and NGBs may help in this regard.

King George’s Field (E3)

Site ref	E3	Site name	King George’s Field
Highways comments	Not requested – no new access is required.		
Archaeology comments	No anticipated archaeological impact.		
Landscape comments	Not requested – existing open space with no built facilities proposed.		
Arboricultural and ecological comments	Not requested – existing open space with no plans that would impact on trees or wildlife.		
Strategy 3 – Sustainable Development	<i>Conserving and enhancing the environment</i> – Site E3 is within the urban area of Exmouth and would therefore minimise harm to biodiversity and the quality and character of the landscape. If sports pitch drainage were installed this could feed into the existing drainage system for Exmouth Town FC. The site is an existing playing field, formalising sports pitch use would reduce the burden for new Greenfield sites.		
	<i>Prudent natural resource use</i> – The location of site E3 would discourage travel by vehicular transport (be that car or bus) and would encourage walking and cycling to the site thereby reducing reliance on fossil fuels and carbon emissions. The site would be used by Exmouth Town FC who have existing car parking and clubhouse facilities that would be utilised.		
	<i>Promoting social well being</i> – Providing sports pitches on this site would promote social well being as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle within the fabric of the town could be considered to have better social wellbeing outcomes. The site is currently used for informal kickabouts and in this case this use would need to be allowed to continue in this location. The site is also used by dog walkers however there is a requirement for dogs to be kept on leads in place already. If a formalised pitch was laid out then this would need to be respected and enforced.		
	<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of a youth football pitch on site E3 could enable all of Exmouth Town FC’s natural grass pitch needs to be located in one place, minimising maintenance costs and encouraging use of any social facilities at the existing clubhouse.		
	<i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the ease of access to any facilities delivered on this site would be preferable.		
Strategy 4 – Balanced Communities	As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community.		
Strategy 5B – Sustainable Transport	Site E3’s location within the town enables users to access the site by foot, bike and public transport, reducing the need to travel by car. Some users will still need to access the site by car although it is anticipated that a pitch in this location would be to serve Exmouth Town FC and as such the existing car park would be used.		
Strategy 6 – Development within Built-up Area Boundaries	Provision of a formalised sports pitch on this site would be compatible with the character of the site and its surroundings, would help to reduce unacceptable pressure on existing services (sports pitches), would not impair highway safety or traffic flows would not prejudice the development of an adjacent site and would not damage wildlife, landscape, townscape or historical interests. Delivery of formalised pitches would not lead to a loss of recreational land but community use of the site for kickabouts and dog walking would need to be allowed to continue otherwise this loss might be a loss that would need to be mitigated. The site is located within the floodzone but it would not adversely affect flood risk or coastal erosion (especially if no		

	surface works were applied or drainage installed).
Strategy 22 – Development at Exmouth	Sports pitch development in this location would go a little way to meeting the needs for new social, community and leisure facilities and would avoid harming the Exe Estuary wildlife and habitats. Delivery of a formalised pitch here, whilst close to the Exe Estuary, would not impact directly on it as this would be an extension to the use of Exmouth Town FC with no new built facilities or floodlights. It is unlikely that any additional users of the site would impact on the estuary, however, the site is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site E3 is within the wider Sidmouth and Lyme Bay Coastal Plateau Landscape Character Area though shows little in the way of the distinctive characteristics associated with this character area. The site is located within the Urban Landscape Character Type for Exmouth which reflects the fact that the landscape is seen in the context of the town. Delivering additional sports pitches in this location would protect other more sensitive landscape areas (including but not limited to the AONB) from potentially inappropriate change.
Strategy 47 – Nature Conservation and Geology	Laying out a formalised youth football pitch on this existing playing field would likely have no detrimental impact on biodiversity or geodiversity. Whilst located close to the Exe Estuary, proposals would not impact upon it.
D3 – Trees and Development Sites	There would be no impact on trees for this site unless sports pitch drainage were installed in which case this would have to respect the existing trees at the southern end of the site.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that there would be no anticipated archaeological impact.
EN13 – Development on High Quality Agricultural Land	Site E3 is designated as “urban” in terms of agricultural land grading. That being the case this policy is not directly relevant, though clearly delivery of sports pitches in this location could avoid the need to use high quality agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would at most be in small doses perhaps once a year and considering this site is a public park it may be that such use would be unlikely anyway. In addition to this, sports pitch usage creates noise pollution. Usage is likely to be restricted to weekends and perhaps one or two nights per week and as an existing playing field it is reasonable that it is used as such. Potentially usage restrictions could be enforced on any planning permission should this be necessary to mitigate local amenity impacts. Floodlights would not be intended to be installed.
EN16 – Contaminated Land	Site E3 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site E3 is within floodzone 3 and therefore located on the floodplain. If a planning application were required (for installation of drainage etc) then a sequential test and flood risk assessment may be required, however if simply marking out a pitch on the field as it exists then no application would be necessary. Delivery of a youth football pitch here would provide wider sustainability benefits (less travel, sustainability of Exmouth Town FC, reduction in need for additional greenfield sites with more detrimental landscape impacts etc); it would be located on an existing playing field which whilst not technically previously developed land is essentially the same use as proposed; and delivery of a pitch here would not increase flood risk elsewhere.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, if sports drainage were installed then the implications of this drainage would need to be considered.
RC2 – New Open Space,	Site E3 is an existing playing field site and so technically Policy RC2 is not

Sports Facilities and Parks	relevant, however, a formal sports pitch would be a different open space use to that which currently exists so it is still useful to consider the site against the criteria in the policy. To protect the physical amenities enjoyed by adjoining residents the site would need to remain available to the local community as a publicly accessible playing field (rather than being closed off and available only to club users). The site would be easily accessible by public transport, bicycle and foot. Car (and cycle) parking and clubhouse/changing facilities would be accommodated at Exmouth Town FC immediately next door. The local road network can safely accommodate the increase in traffic which would be minimal. Delivery of a pitch here would negate the need to use high quality agricultural land, sites more sensitive to natural, biodiversity or landscape change, or of archaeological or historic interest.
TC2 – Accessibility of New Development	Site E3 is well located for access by public transport, bicycle and foot. It is well related to the urban areas from which users will travel and so will minimise the need to travel by car as much as possible. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	The site is easily accessible by public footpaths along Carter Avenue and the Exe Trail cycle path.
TC7 – Adequacy of Road Network and Site Access	There are no concerns over the adequacy of the local road network or access for the site.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site is its location which should minimise travel by car there will inevitably be a need to accommodate some car parking and it is assumed that the existing parking facilities at Exmouth Town FC will serve this site as well.

Littleham Primary School (E4)

Site ref	E4	Site name	Littleham Primary School
Highways comments	It is proposed to access the site through plumb park hosing allocation. The Local Highway Authority wouldn't have any objection to this. The visibility on to Cranford Ave and on to Salterton road are both acceptable.		
Archaeology comments	No anticipated archaeological impact.		
Landscape comments	Due to its urban edge context, the existing playing field use, the mature boundary hedgerows and the local topography the delivery of 2 youth pitches with a small scale changing room facility on this site would have low adverse landscape and visual impact.		
Arboricultural and ecological comments	Floodlighting would negatively impact on bats. 10 metre buffer zone around round boundary trees or mature crown spread plus 5m whichever is larger.		
Strategy 3 – Sustainable Development	<p><i>Conserving and enhancing the environment</i> – Site E4 is within the Built-up Area Boundary (BuAB) of Exmouth but essentially within the urban fringe. With careful design and implementation any potential harm to biodiversity and the quality and character of the landscape could be minimised. Any sports pitch drainage could potentially feed into SUDS provided as part of the proposed Plumb Park housing development next door. The site is an existing school playing field, formalising community sports pitch use would reduce the burden for new Greenfield sites.</p> <p><i>Prudent natural resource use</i> – Site E4 would be accessible by sustainable modes of transport thereby potentially reducing reliance on fossil fuels and carbon emissions though it's location on the edge of the urban area may mean that more users access the site by private car than if the site were more central. As a site for just younger junior teams there would be no need for a new clubhouse/changing facility, however an externally accessible toilet facility would need to be provided.</p> <p><i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle within the fabric of the town could be considered to have better social wellbeing outcomes. Enabling the school playing field to be used by the wider community can help to integrate the school and community.</p> <p><i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of just a youth 9v9 football pitch and mini 7v7 soccer pitch on site E4 would mean that clubs would have to use this in addition to other sites to fulfil their pitch demands which is not necessarily that sustainable for the long term viability of clubs. It would enable a potential income stream for the primary school though.</p> <p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the ease of access to any facilities delivered on this site would be preferable to some. With easily accessible, readily available flat land at a premium in the Exmouth area it is important to consider school playing field sites for dual use in the long term.</p>		
Strategy 4 – Balanced Communities	As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community.		
Strategy 5B – Sustainable Transport	Site E4's location within but on the edge of the town enables users to access the site by foot, bike and public transport, reducing the need to travel by car. Some users will still need to access the site by car although it is anticipated that the pitch would be to serve more local needs than anything else. A limited number of parking spaces might potentially be able to be located on		

	the new Plumb Park housing development adjacent to the field.
Strategy 6 – Development within Built-up Area Boundaries	Provision of formalised sports pitches on this site would be compatible with the character of the site and its surroundings, would help to reduce unacceptable pressure on existing services (sports pitches), would not impair highway safety or traffic flows would not prejudice the development of an adjacent site and would not damage wildlife, landscape, townscape or historical interests. Delivery of formalised pitches would not lead to a loss of recreational land. The site is not located within the floodplain and would not adversely affect flood risk or coastal erosion.
Strategy 22 – Development at Exmouth	Sports pitch development in this location would go a little way to meeting the needs for new social, community and leisure facilities and would avoid harming the Exe Estuary wildlife and habitats. Delivery of a formalised pitch here would not impact on the Exe Estuary, however, the site is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site E4 is within the wider Sidmouth and Lyme Bay Coastal Plateau Landscape Character Area though shows relatively little in the way of the distinctive characteristics associated with this character area. The site is partly located within the Urban Landscape Character Type for Exmouth which reflects the fact that the landscape is seen in the context of the town, and partly in the Open Coastal Plateaux Landscape Character Type which it does tend to share some characteristics with. Delivering additional sports pitches in this location would protect other more sensitive landscape areas (including but not limited to the AONB) from potentially inappropriate change. However, the more distinctive characteristics of the Open Coastal Plateaux LCT including dense low hedges should be retained and enhanced as much as possible. Having said that, previously approved plans for the adjacent Plumb Park housing development indicated a possible access through to the primary school breaking the hedgeline in the south-west corner of this field and that access would be integral to bringing this site forward for use as community sports pitches.
Strategy 47 – Nature Conservation and Geology	Delivering sports pitches on this site would require a reasonable amount of re-profiling of the land. Careful design and implementation would be required to ensure that tree root protection zones for large mature trees within the site boundary were respected. The presence of bats would make floodlights unlikely to be acceptable in this location but none are proposed.
D3 – Trees and Development Sites	As advised above, any re-profiling of the land to create platforms for pitch development would need to respect the tree root protection zones of mature trees in the site boundary. Hedgerows forming the site boundary are an important landscape feature and should be retained as much as possible, though noting the intended access to the school from the new housing site in the south-west corner which would be integral to bringing this site forwards for community sports pitches.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that there would be no anticipated archaeological impact.
EN13 – Development on High Quality Agricultural Land	Site E4 is designated as “urban” in terms of agricultural land grading. That being the case this policy is not directly relevant, though clearly delivery of sports pitches in this location could avoid the need to use high quality agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would at most be in small doses perhaps once a year and considering this site is a primary school it may be that such use would be unlikely anyway. In addition to this, sports pitch usage creates noise pollution. Usage is likely to be restricted to weekends and perhaps one or two nights per week in addition to usage during the school day. Potentially usage restrictions could be enforced on any planning permission should this be necessary to mitigate local amenity impacts. Floodlights would not be

	intended to be installed.
EN16 – Contaminated Land	Site E4 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site E4 is in floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are likely to be required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered. Potentially drainage systems could feed into any SUDS provided for the adjacent housing site.
RC2 – New Open Space, Sports Facilities and Parks	Site E4 is an existing school playing field site and so technically Policy RC2 is not relevant, however, enabling community use of the formalised sports pitches would be a different open space use to that which currently exists so it is still useful to consider the site against the criteria in the policy. Levelling and laying out formalised pitches on this site would not unduly affect the character or appearance of the area or the visual or physical amenities enjoyed by adjoining residential areas with the exception of potentially increasing the noise impact for neighbours which could potentially be mitigated through usage restrictions. The site (assuming access via the proposed Plumb Park housing development) would be accessible by public transport, bike and foot. A small amount of car parking and cycle parking could potentially be provided adjacent the access from the new housing site. Providing access is gained through the housing development then the local road network would safely accommodate the traffic and access would be appropriate. Delivering pitches here would avoid the need to use high quality agricultural land, areas of greater nature and landscape sensitivity, and land with scientific, archaeological or historic interest.
TC2 – Accessibility of New Development	Site E4 is well located for access by public transport, bicycle and foot assuming that access is gained through the adjacent Plumb Park housing development. If this cannot be achieved for whatever reason then the site will not be accessible and therefore could not be made available for community use. It is well related to the urban areas from which users will travel and so will minimise the need to travel by car as much as possible. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	The site will be easily accessible by public footpaths along roads within the Plumb Park housing development assuming that is built out. Otherwise, the site is currently not accessible by any footpaths, bridleways or cycleways.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has raised no concerns over the adequacy of the local road network or access assuming that it is gained via the Plumb Park development.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site is its location which should minimise travel by car there will inevitably be a need to accommodate some car parking. Guidance from Sport England and NGBs may help in this regard.

Brixington Primary School (E7)

Site ref	E7	Site name	Brixington Primary School
Highways comments	Not requested – existing site and no new access required.		
Archaeology comments	Not requested – existing flat site with no re-profiling required.		
Landscape comments	Not requested – existing site with no new clubhouse required.		
Arboricultural and ecological comments	Floodlighting would negatively impact on bats. 10 metre buffer zone around round boundary trees or mature crown spread plus 5m whichever is larger.		
Strategy 3 – Sustainable Development	<i>Conserving and enhancing the environment</i> – Site E7 is within the Built-up Area Boundary (BuAB) of Exmouth. Laying out pitches here would minimise harm to biodiversity and landscape quality and character. The sports pitch drainage outfalls would need to feed into a suitable system or soakaway. Pitches would not add to potential issues of surface water flooding and in fact should reduce the risk on-site through installation of sports pitch drainage. The site is an existing school playing field, formalising community sports pitch use would reduce the burden for new Greenfield sites.		
	<i>Prudent natural resource use</i> – Site E7 is central located within a large residential area of Exmouth and would be accessible by sustainable modes of transport thereby potentially reducing reliance on fossil fuels and carbon emissions. As a site for just younger junior teams there would be no need for a new clubhouse/changing facility, however an externally accessible toilet facility would need to be provided.		
	<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle within the fabric of the town could be considered to have better social wellbeing outcomes. Enabling the school playing field to be used by the wider community can help to integrate the school and community.		
	<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of just 1x mini 7v7 and 1x mini 5v5 soccer pitches on site E7 would mean that clubs would have to use this in addition to other sites to fulfil their pitch demands which is not necessarily that sustainable for the long term viability of clubs. It would enable a potential income stream for the primary school though.		
	<i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the ease of access to any facilities delivered on this site would be preferable to some. With easily accessible, readily available flat land at a premium in the Exmouth area it is important to consider school playing field sites for dual use in the long term.		
Strategy 4 – Balanced Communities	As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community.		
Strategy 5B – Sustainable Transport	Site E7's location within the town and in particular within a large residential area of the town would enable users to access the site by foot, bike and public transport, reducing the need to travel by car. Some users will still need to access the site by car although it is anticipated that the pitch would be to serve more local needs than anything else. A limited number of parking spaces already exist to serve the primary school and it is assumed that these could be utilised by community users of the pitch.		
Strategy 6 – Development within Built-up Area Boundaries	Provision of a formalised sports pitch on this site would be compatible with the character of the site and its surroundings, would help to reduce unacceptable pressure on existing services (sports pitches), would not impair highway safety or traffic flows would not prejudice the development of an		

	adjacent site and would not damage wildlife, landscape, townscape or historical interests. Delivery of formalised pitches would not lead to a loss of recreational land. The site is not located within the floodplain and would not adversely affect flood risk or coastal erosion.
Strategy 7 – Development in the Countryside	Site E7 is located within the Built-up Area Boundary for Exmouth and therefore this policy does not apply.
Strategy 22 – Development at Exmouth	Sports pitch development in this location would go a little way to meeting the needs for new social, community and leisure facilities and would avoid harming the Exe Estuary wildlife and habitats. Delivery of a formalised pitch here would not impact on the Exe Estuary, however, the site is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site E7 is within the wider Sidmouth and Lyme Bay Coastal Plateau Landscape Character Area though shows little in the way of the distinctive characteristics associated with this character area. The site is located within the Urban Landscape Character Type for Exmouth which reflects the fact that the landscape is seen in the context of the town. Delivering sports pitches in this location would protect other more sensitive landscape areas (including but not limited to the AONB) from potentially inappropriate change.
Strategy 47 – Nature Conservation and Geology	This site is flat and would require no re-profiling of the land in order to deliver sports pitches. Careful design and implementation would be required to ensure that tree root protection zones for large mature trees within the site boundary were respected. The presence of bats would make floodlights unlikely to be acceptable in this location but none are proposed.
D3 – Trees and Development Sites	If sports pitch drainage were required then this would need to respect the tree root protection zones of mature trees in the site boundary.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	As no re-profiling is required on this site it is not anticipated to be any archaeological impact with delivering pitches here.
EN13 – Development on High Quality Agricultural Land	The majority of site E7 is technically designated as Grade 3 agricultural land as is most of the land which forms the Brixington and Bystock housing estates. However it is within the urban area and part of the site is designated as “urban” in terms of agricultural land grading. That being the case this policy is not directly relevant, though clearly delivery of sports pitches in this location could avoid the need to use higher quality agricultural land capable of being used as such.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would at most be in small doses perhaps once a year and considering this site is a primary school it may be that such use would be unlikely anyway. In addition to this, sports pitch usage creates noise pollution. Usage is likely to be restricted to weekends and perhaps one or two nights per week in addition to usage during the school day. Potentially usage restrictions could be enforced on any planning permission should this be necessary to mitigate local amenity impacts. Floodlights would not be intended to be installed.
EN16 – Contaminated Land	Site E7 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site E7 is in floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are likely to be required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.
RC2 – New Open Space, Sports Facilities and Parks	Site E7 is an existing school playing field site and so technically Policy RC2 is not relevant, however, enabling community use of the formalised sports pitches would be a different open space use to that which currently exists so it is still useful to consider the site against the criteria in the policy. Laying out formalised pitches on this site would not unduly affect the character or

	appearance of the area or the visual or physical amenities enjoyed by adjoining residential areas with the exception of potentially increasing the noise impact for neighbours which could potentially be mitigated through usage restrictions. The site would be accessible by public transport, bike and foot. A small amount of car parking and cycle parking is already provided for the primary school and it is assumed that this could be utilised by any community users of the pitch. The local road network would safely accommodate the traffic and access would be appropriate. Delivering pitches here would avoid the need to use higher quality agricultural land, areas of greater nature and landscape sensitivity, and land with scientific, archaeological or historic interest.
TC2 – Accessibility of New Development	Site E7 is well located for access by public transport, bicycle and foot and well related to the urban areas from which users will travel and so will minimise the need to travel by car as much as possible. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	The site is easily accessible by public footpaths along Brixington Lane and Spider’s Lane.
TC7 – Adequacy of Road Network and Site Access	There are no concerns over the adequacy of the local road network or existing primary school access as usage will be much reduced in comparison to usage for the school.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site is its location which should minimise travel by car there will inevitably be a need to accommodate some car parking. It is assumed that existing parking for the school could be utilised. Guidance from Sport England and NGBs may help in this regard.

Salterton Road (E9 and E16)

Site ref	E9 and E16	Site name	Salterton Road
Highways comments	The creation of a new access off of Salterton road would a less preferable option. The Local Highway Authority would accept the use of the existing access off of Mountain Farm. A new access off of Caple lane would also be acceptable.		
Archaeology comments	No anticipated archaeological impact.		
Landscape comments	Due to its location within the East Devon AONB and the Coastal preservation Area as designated within the new local plan, the delivery of two adult pitches and one junior pitch including ancillary facilities (e.g. parking and clubhouse) on this site would have result in a major adverse landscape and visual impact.		
Arboricultural and ecological comments	Potential for bat foraging and bird nesting Floodlighting, noise, disturbance. Loss of habitat Nature. 10m buffer zone around Devon hedgebanks. Mature crown spread plus 5m buffer zone around hedgerow standard trees.		
Strategy 3 – Sustainable Development	<i>Conserving and enhancing the environment</i> – Site E9/16 is within the open countryside but immediately adjacent the urban area of Exmouth. Its AONB location in a particularly visible point in the landscape means that the quality and character of the landscape could be detrimentally impacted upon through the delivery of pitches in this location. In addition to this, there is potential for biodiversity loss and disturbance depending on the layout and design of pitches and ancillary facilities. Sports pitch drainage would likely need to drain a small pond to the south of the site. This is a Greenfield site but there is little scope for strategic additional pitch provision on previously developed land in the Exmouth area.		
	<i>Prudent natural resource use</i> – The location of site E9/16 on the edge of the urban area but on a main road would hopefully encourage travel by sustainable modes (walking, cycling, bus) and discourage travel by private car thereby reducing reliance on fossil fuels and carbon emissions in comparison to some options, however the site is still a great distance from much of the town’s population and so many people would drive to the site. There is a bus stop directly adjacent the site on Salterton Road. Limited car parking would still need to be provided. New clubhouse/changing facilities would need to be provided for the site.		
	<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle could be considered to have better social wellbeing outcomes than if that were not possible. Having said that, the site is on the edge of the town and would not necessarily feel like it was part of the community in the same way as a site integral to the town.		
	<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. The STRI potential plans show that a number of pitches could be accommodated on site which could help to minimise maintenance costs and transport costs and encourage use of any social facilities provided as part of a new clubhouse.		
	<i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the potential ease of access to any facilities delivered on this site would be beneficial.		
Strategy 4 – Balanced Communities	As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches that are delivered in the heart of the community could have a better outcome in		

	<p>creating a balanced community. Pitches in this location would be on the fringe of the urban area so less suitable than those within it in that respect. However, the site is located adjacent within one of the more deprived areas of Exmouth and as so could help to address access to such facilities.</p>
Strategy 5B – Sustainable Transport	<p>Site E9/16 is located on Salterton Road, which forms the main access route through the eastern part of Exmouth into the town centre. Multiple bus routes extend along Salterton Road and stop outside the site for access to the Liverton Business Park. In addition to this, the site would be easily capable of being walked and cycled to with very minor improvements. Therefore, the site would contribute towards the objectives of promoting and securing sustainable modes of travel and transport.</p>
Strategy 7 – Development in the Countryside	<p>Site E9/16 is located directly adjacent to the Exmouth Built-up Area Boundary and therefore within the open countryside. In this location development will only be permitted where it is in accordance with a specific policy and it meets certain other criteria. Delivery of pitches here would require significant land re-profiling to create flat platforms. This could well cause significant harm to the land form which forms part of the distinctive landscape. Having said that, the site could potentially be seen as an extension of the historical pattern of the settlement in extending along Salterton Road. The re-profiling of the land that would be required could cause significant harm to the AONB, local landscape character, topography and traditional field boundaries. The site would be seen from Castle Lane on the southern side of the Littleham Brook valley, and whilst potentially it could be seen in the context of the existing development at Liverton Business Park, it could be a visual intrusion into the rolling hills of the AONB.</p>
Strategy 22 – Development at Exmouth	<p>Sports pitch development in this location would go some way to meeting the needs for new social, community and leisure facilities and would avoid harming the Exe Estuary wildlife and habitats. Careful design and implementation of plans for the site would be needed to ensure no harm to the existing hedgebanks and mature oak tree on site which as well as being important landscape features could have potential for bat foraging and bird nesting. Delivery of pitches here would not impact directly on the Exe Estuary as it is a good distance from the estuary. However, it is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.</p>
Strategy 44 – Undeveloped Coast and Coastal Preservation Area	<p>Site E9/16 is located within the Coastal Preservation Area. The site has intervisibility with the sea and is defined by its visual openness, even if it is to an extent framed by the Liverton Business Park immediately to the north. Delivery of pitches on this site would require significant cut and fill and potentially as a result screening planting which would detract substantially from that visual openness.</p>
Strategy 46 – Landscape Conservation and Enhancement and AONBs	<p>Site E9/16 is within the wider Sidmouth and Lyme Bay Coastal Plateau Landscape Character Area and shares some distinctive characteristics associated with this character area. The site is located within the Open Coastal Plateaux Landscape Character Type and shares a number of distinctive characteristics with this character type. The site is within the East Devon AONB and due to the significant amount of cut and fill re-profiling that would be necessary here could have a significant detrimental impact on the landscape character and quality. The amount of pitches identified that could be delivered on this site could reasonably be delivered on other sites outside of the AONB.</p>
Strategy 47 – Nature Conservation and Geology	<p>The potential presence of bats and nesting birds on site plus the existence of established hedgebanks and a mature oak tree within the eastern most field mean that any pitches on this site would have to be carefully designed so as to have minimal/any negative impact on these. Some impacts may be possible to be mitigated through replacement/strengthening of existing hedgerows, but the biodiversity value of the mature oak tree could not easily be replaced/mitigated if lost. The plans produced by STRI show the adult pitch in the eastern-most field avoiding the oak tree, but its presence would restrict any further provision in this part of the site.</p>

D3 – Trees and Development Sites	Consultation with the Council’s arboricultural officers has highlighted the need for at least a 10m buffer area around hedgebanks which form the borders to each field. In addition to this, a mature oak tree is located in the centre of the eastern most field. STRI potential plans show that football or rugby pitches could be delivered on this site without the loss of this tree, however careful design would be required to avoid any impacts on the tree root protection zones.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that there would be no anticipated archaeological impact.
EN13 – Development on High Quality Agricultural Land	Site E9/16 is located on Grade 1 agricultural land which means that it is some of the best, most versatile agricultural land around Exmouth. In comparison, sites E12 and E19 are on Grade 3 which is of lower (though still high) quality agricultural land, and E11 is also on Grade 1 land. Use of such land would only be possible/suitable if there were clear benefits of using this site in comparison to others being considered on lower quality land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. The STRI Stage 1 report highlights that the site has a moderate concentration of weeds. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution. The site has few residential neighbours that would be affected by any increased noise from the site, however, noise may potentially carry across the valley within the AONB, which should be a tranquil and natural landscape. Floodlights would not be intended to be installed on the site so usage would never extend too late into an evening.
EN16 – Contaminated Land	The site is located adjacent to the water works accessed off Salterton Court and opposite Liverton business Park. These are not likely to have an impact in terms of contaminated land and it would be unlikely that an assessment would be required.
EN21 – River and Coastal Flooding	Site E9/16 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.
RC2 – New Open Space, Sports Facilities and Parks	Site E9/16 is located directly adjacent to the Exmouth Built-up Area Boundary. However the delivery of sports pitches in this location would likely unduly affect the character and appearance of the area which is within the AONB. Any pitches in this location would be easily accessible by public transport, bicycle and foot but would require appropriate car and cycle parking provision. Traffic generated by the site could be accommodated on the local road network and use of the existing driveway for Mountain Farm would provide a safe and suitable access. However, locating pitches here would be at the detriment of the best and most versatile agricultural land and landscape.
RC5 – Community Buildings	The site lies adjacent to the Built-up Area Boundary (BuAB) and as such this would be a suitable location for a new community facility.
RC6 – Local Community Facilities	Any clubhouse building delivered on this site would need to be designed to be compatible with the surrounding landscape and not detract from the openness of the site. Ideally the clubhouse would be located at the western end of the site either adjacent to the water works on Salterton Road or on the part of the site that borders Capel Lane. Plans produced by STRI show the facility located off the access at Mountain Farm. This might be the best solution for access, however is less favourable for any built facilities as they would appear detached from the urban area and contribute towards sporadic development. The facilities on the site would be easily accessible by a variety

	<p>of transport modes and the additional traffic could be accommodated on the local road network. The proposals would likely not be detrimental to the amenity of many neighbouring residents as the site has very few, though the impacts on those that do exist should be fully understood at a more detailed stage. As the site is outside the BuAB permission may only be granted if there is a proven need for the facility. There would be a need for a clubhouse/changing facility as part of any pitches in this location, but whether other sites would be more appropriate would impact on whether there was a proven need for these to be delivered in this location or not.</p>
RC7 – Shared Community Facilities	<p>Any new clubhouse facility would need to be available for use by other community groups.</p>
TC2 – Accessibility of New Development	<p>Site E9/16 is well located for access by public transport, bicycle and foot. It is reasonably well related to the urban areas from which users will travel and so could minimise the need to travel by car as much as possible in comparison to other strategic Greenfield sites. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.</p>
TC4 – Footpaths, Bridleways and Cycleways	<p>A footpath extends along Salterton Road on the northern side of the carriageway, but a pedestrian crossing would likely be required in order to link the site in to this network. A footpath also exists along Capel Lane. A public right of way also crosses the site at the eastern end of the western field. More detailed plans for the site would have to take this into consideration and ensure that the route was accommodated.</p>
TC7 – Adequacy of Road Network and Site Access	<p>Consultation with the local highways authority has highlighted that the local road network could accommodate the increase in traffic that might be created by delivery of pitches on this site and suggested that access be gained either off the Mountain Farm driveway on Salterton Road or via Capel Lane.</p>
TC9 – Parking Provision in New Development	<p>Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site in comparison to other strategic Greenfield sites is its location which should minimise travel by car to an extent there will inevitably be a need to accommodate some car parking. Guidance from Sport England and NGBs may help in this regard.</p>

Land north-west of Courtland’s Cross (E11)

Site ref	E11	Site name	Land north-west of Courtland’s Cross
Highways comments	Courtland’s lane is a narrow roads with very few passing places. Most of the passing places are residents driveways, most of these have poor intervisibility. There are a five slight collisions at Courtland’s Cross. The hedge row will need to be move back or removed to allow for visibility along Courtland’s Lane. It may be possible to link the access to the Dinan Way extension, It is proposed to be a 3 arm roundabout it may be possible to modified this to be a 4 arm roundabout. This would be a safer option than having an access off of Courtland’s Lane.		
Archaeology comments	This site is within an area of archaeological potential, adjacent to a possible prehistoric route way that follows the Lymptone/Withycombe Raleigh parish boundary. It is possible that groundworks for the development of this this greenfield location may reveal archaeological evidence associated with the prehistoric activity in this area. Depending on the scope of works required the Historic Environment Team may recommend that any consent should be conditional upon a programme of archaeological work being undertaken in mitigation for any impact on the historic environment.		
Landscape comments	Due to its proximity to nationally and regionally designated areas and its location near an important heritage asset the delivery of sport pitches on this site would have moderate to major adverse landscape and visual impact. Careful consideration should be given to the siting of the pitches and the provision of ancillary infrastructure should be kept to a minimum, sited appropriately and be of outstanding architectural design taking account of the local vernacular and the intervisibility between the site, the Exe Estuary and A La Ronde.		
Arboricultural and ecological comments	Potential for bat foraging along hedgebanks. Floodlighting and noise likely to negatively impact on bats.		
Strategy 3 – Sustainable Development	<i>Conserving and enhancing the environment</i> – Site E11 is within the open countryside but adjacent the urban area of Exmouth. Its hill top location makes it particularly visible particularly from across the Exe Estuary and from the National Trust property A La Ronde and this means that the quality and character of the landscape could be detrimentally impacted upon through the delivery of pitches in this location unless carefully designed and implemented. In addition to this, there is potential for bat foraging in the hedgebanks which delineate the various fields which should be respected with harm being avoided. Sports pitch drainage would likely need to drain the small pond in the western field. This is a Greenfield site but there is little scope for strategic additional pitch provision on previously developed land in the Exmouth area. Indeed this is the only site capable of taking all of the additional rugby pitch requirements for the town in one place.		
	<i>Prudent natural resource use</i> – The location of site E11 on the edge of the urban area but on a main road would hopefully encourage travel by sustainable modes (walking, cycling, bus) and discourage travel by private car thereby reducing reliance on fossil fuels and carbon emissions in comparison to some options, however the site is still a great distance from much of the town’s population and so many people would drive to the site. Limited car parking would still need to be provided. New clubhouse/changing facilities would need to be provided for the site, whilst still taking account of the particularly sensitive location in the landscape.		
	<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle could be considered to have better social wellbeing outcomes than if that were not possible. Having said that, the site is on the edge of the town and would not necessarily feel like it was part of the community in the same way as a site integral to the town.		
	<i>Encouraging sustainable economic development</i> – Whilst sports pitches are		

	<p>not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. This site provides the only opportunity to deliver all of the additional rugby pitches required for the town in one location which could help to minimise maintenance costs and transport costs and encourage use of any social facilities provided as part of a new clubhouse.</p> <p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. Other sites may be easier to access, however the long term needs of rugby in the town can only realistically be met on this site.</p>
Strategy 5B – Sustainable Transport	Site E11's location on the edge of the town would enable users to access the site by foot, bike and public transport, however, many would likely still choose to access the site by car.
Strategy 7 – Development in the Countryside	Site E11 is located adjacent the Built-up Area Boundary for Exmouth in the open countryside. Policy RC4 allows for new sports development in the open countryside where certain criteria are met and these are considered against that policy. The delivery of sports pitches on this site would be a departure from the traditional and form and settlement pattern for Exmouth which is typically located below the ridgeline. This site is part of a local area of higher land which forms the natural buffer between the settlements of Exmouth and Lympstone hence the designation of the area as a Green Wedge in the Local Plan (Strategy 8). In addition to this, development of the site could potentially have a detrimental impact on the setting of the Grade 1 listed National Trust property "A La Ronde" unless particularly carefully designed and implemented. The site is also in close proximity to the Exe Estuary with its various national and international designations for conservation and protection which would rule out floodlights in this location. Unless carefully designed any built facilities in this location would be detrimental to the landscape and cause adverse disruption to public views.
Strategy 8 – Development in Green Wedges	Delivery of sports pitches themselves would not necessarily be in conflict with the designation of a green wedge between Exmouth and Lympstone. However, any ancillary facilities including clubhouse, car parking, covered stands or floodlights would be in conflict with the policy. To reduce conflict any clubhouse/car parking would best be located immediately adjacent to the BuAB, however this would reduce the capacity of the site in terms of the pitches themselves considerably. The potential site plans produced by STRI propose the clubhouse and car parking in the northern most field which is detached and isolated from any other development. In principle this is in direct conflict with this policy, however, if designed to a very high specification including potentially a landscaped green roof and grasscrete parking area then it could potentially be acceptable and then pitches and ancillary facilities in this location could then actually reinforce the green wedge.
Strategy 22 – Development at Exmouth	Sports pitch development in this location would be the only location capable of taking all of the additional natural grass rugby pitch needs for Exmouth in one location. This would go a long way towards meeting the needs for new social, community and leisure facilities but unless it was very carefully designed, built facilities were minimal and floodlights were ruled out then it could potentially cause significant harm to the Exe Estuary landscape, wildlife and habitats and the setting of A La Ronde. Delivery of pitches here would not encourage additional visitors to the Exe Estuary as it is a good distance from the estuary and located above it. However, it is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.
Strategy 44 – Undeveloped Coast and Coastal Preservation Area	Site E11 is located within the Coastal Preservation Area. This protects land under its designation from development or change of use where it would damage the undeveloped/open status of the area and is defined by its visual openness and views to and from the sea. Sports pitches themselves could potentially reinforce the open nature of the site and protect it from being lost,

	<p>however, any built facilities could have a significant detrimental impact on this aspect unless very carefully designed and implanted for example using a landscaped green roof for the clubhouse and grasscrete for the car parking. Some screening planting would be required to mitigate any impact on the setting of A La Ronde, however too much might impact on the visual openness of the site so this is a fine balance that must be struck.</p>
Strategy 46 – Landscape Conservation and Enhancement and AONBs	<p>Site E11 is within the wider Exe Estuary and Farmlands Landscape Character Area with which the site shares some distinctive characteristics. The site is located within the Lower Rolling Farmed and Settled Slopes Landscape Character Type with which again a number of distinctive characteristics are shared. Whilst not designated as AONB, there is a clear landscape sensitivity to this location and it would be important to respect the distinctive characteristics of the wider landscape reflected within the site.</p>
Strategy 47 – Nature Conservation and Geology	<p>Potential presence of bats would mean that floodlights would be unlikely to be approved in this location, and landscape impacts would compound that concern. Hedgebanks should be retained as much as possible throughout the site.</p>
D3 – Trees and Development Sites	<p>Consultation with arboricultural officers at the Council has not highlighted any particular concerns regarding protection and retention of existing trees on the site, however clearly they and hedgebanks should be conserved as much as possible. New tree planting may be required as screening to mitigate the impact of any built facilities on the setting of A La Ronde or views of the Exe Estuary.</p>
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	<p>Consultation with the County Council’s Historic Environment team has highlighted that there could be significant archaeological potential on this site relating to prehistoric routes along the Lypstone/Withycombe Raleigh parish boundary and other prehistoric activity. A programme of archaeological work would likely be required in mitigation for any potential impact on the historic environment.</p>
EN9 – Development Affecting a Designated Heritage Asset	<p>Delivery of sports pitches (and more specifically associated built facilities) may have a detrimental affect on the setting of A La Ronde which is a designated heritage asset (Grade 1).Harm would likely be less than substantial if carefully designed and screened. Policy allows for less than substantial harm caused by proposals to be weighed up against the public benefits of the proposal. In this case, provision of rugby pitches on the only land capable of accommodating the volume required may be considered a significant public benefit.</p>
EN13 – Development on High Quality Agricultural Land	<p>Site E11 is designated as Grade 1 agricultural land and is therefore considered to be some of the best and most versatile agricultural land available. Use of such land for anything other than agriculture or forestry is only permitted where there is an overriding need for the development, lower grades of land are not available or is more sensitive in other ways, or the benefits of the development justify the loss. As no other site is capable of taking significant numbers of rugby pitches there is an overriding need for the use of this site, there is no land of lower agricultural grade and the benefits of the proposal would justify the loss. The alternative would be to provide pitches on multiple different sites around the town which would be less sustainable and viable and would necessitate use of sites either within (E9/16) or in close proximity and forming the setting of the AONB (E19). Site E9/16 is also Grade 1 agricultural land, whilst E19 is Grade 3.</p>
EN14 – Control of Pollution	<p>Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year, however, the STRI Stage 1 report highlights that the site only has a limited weed content. This may mean that less pesticide use is needed here than on some other sites. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses, and being in such close proximity to the sensitive Exe Estuary this will be of key importance. In addition to this, sports pitch usage creates noise pollution. If the site is used for grass pitches then this is likely to be restricted to weekends and perhaps one or two</p>

	<p>evenings per week within daylight hours. The site is not in the AONB but noise impact on a countryside location will still be relevant. The site is not especially tranquil being in such close proximity to Exmouth and the A376 but if necessary noise impact could be controlled through usage restrictions. Floodlights would not be suitable in this location due to landscape and potential presence of bats so usage would never extend too late into an evening.</p>
EN16 – Contaminated Land	<p>Site E11 is not on or in such close proximity to any contaminated land for this policy to apply.</p>
EN21 – River and Coastal Flooding	<p>Site E11 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.</p>
EN22 – Surface Run-off Implications of New Development	<p>Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.</p>
RC2 – New Open Space, Sports Facilities and Parks	<p>Site E11, whilst being in the open countryside adjoins the Exmouth BuAB and so policy RC2 is relevant. Careful design would be required to ensure that the built facilities required to accompany any pitches in this location did not unduly affect the character and appearance of the area. The physical and visual amenities of neighbouring residents along Courtland's Lane would also need to be considered. The site would be easily accessible by public transport, bicycle and foot. With potential for the site to link in to the Valley Parks which aim to connect the north of Exmouth through to the town centre by footpath/cycleway. Appropriate car parking and cycle parking could be provided on site though it would have to be carefully designed to minimise impacts on the landscape. There is currently no suitable access for a site hosting so many sports pitches as Courtland's Lane is too narrow. However, intention is for the completion of the Dinan Way distributor road to connect with the A376 immediately adjacent to this site and access could be taken from that roundabout. As explained above, the site is Grade 1 agricultural land, is particularly sensitive in landscape and nature conservation terms and there is likely to be significant archaeological interest in the site but it is the only site capable of taking all of the additional grass pitches required for Exmouth.</p>
RC5 – Community Buildings	<p>A new clubhouse/changing facility will be required for sports pitches of this volume in this location. The site is adjacent to the BuAB, however, the only part of the site suitable for delivery of the building is the furthest from the BuAB boundary.</p>
RC6 – Local Community Facilities	<p>Any clubhouse building will need to be designed compatible with the character of the site and its surroundings which is a particularly sensitive landscape. Ideally the building should be located close to existing development along Courtland's Lane but this would significantly compromise the delivery of pitches on this site. That being the case a clubhouse has been shown on the proposed plans drawn up by STRI as being delivered in the northern most field which is removed from the urban area. To be acceptable in that location design would have to be of the highest quality and it would need to integrate into the landscape through the use of green roof technology etc. The site is accessible by a variety of transport modes including walking and cycling, and so long as access is gained from the proposed new roundabout on the A376 then traffic generated by the proposal could be accommodated on the local road network. Usage of the clubhouse facility may need to be restricted to avoid detrimental impact through noise pollution.</p>
RC7 – Shared Community Facilities	<p>Any new clubhouse facility would need to be available for use by other community groups and in this accessible location it is likely that it would be well used.</p>
TC2 – Accessibility of New Development	<p>Site E11 is well located for access by public transport and would be accessible by bicycle and foot. It is reasonably well related to the urban areas from which users will travel and has potential to be linked in to the Valley Parks footpath and cycle network that is being developed. It has the potential</p>

	therefore to minimise the need to travel by car as much as possible, however many users will still travel to the site by car. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	Public footpaths currently exist along Exeter Road but not along Courtland’s Lane. The Exeter Road footpath could easily be extended as part of the plans to provide a roundabout on the A376 (Exeter Road) to serve Dinan Way. The East Devon Way footpath also crosses the site. The pitches and ancillary facilities would need to respect this route and ensure that it does not need to be diverted. Retention of the footpath through the site may result in a slightly diminished attractiveness of the route but it would not block views out to the wider countryside. If necessary alternative routes of greater attractiveness could be sought.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has identified that Courtland’s Lane is not suitable as an access road for sports pitches of this magnitude due to its narrow nature and lack of passing points. It is suggested that access is taken off the proposed new roundabout on the A376 being provided as part of the completion of the Dinan Way distributor road. This would enable suitable site access, without which the site could probably not come forwards.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Inevitably some car parking will need to be accommodated and landscape requirements may dictate that this is provided as a grasscrete or similar surface. Guidance from Sport England and NGBs may help in this regard.
Lympstone Neighbourhood Plan – vision	Unless designed carefully and appropriately, delivery of pitches (and more specifically built facilities) at Courtland’s Cross could add towards actual or perceived settlement coalescence. However, the demand for enhanced provision of amenities, activities and facilities could be met through use of this site, and if designed appropriately could secure/preserve the green wedge from other, more detrimental development.
Lympstone Neighbourhood Plan – Policy 3	Delivery of sports pitches on site E11 would potentially be acceptable as it would be providing a community facility, however, the pitches and ancillary built development would have to be designed so as to cause no harm to the character and purpose of the Green Wedge and Coastal Preservation Area. This assessment provides justification for use of the site on sustainability grounds.

Land north of Hulham Road (E12)

Site ref	E12	Site name	Land north of Hulham Road
Highways comments	The existing access is few metres away from the junction on to Hulham Road. The access could be improved from a safety point of view if it was moved on to Hullham Road.		
Archaeology comments	Prehistoric activity is recorded in the wider landscape here and there is the potential for groundworks to expose archaeological deposits. Depending on the scope of works required the Historic Environment Team may recommend that any consent should be conditional upon a programme of archaeological work being undertaken in mitigation for any impact on the historic environment.		
Landscape comments	Due to site's enclosed nature the delivery of sport pitches on this site would have negligible adverse landscape and visual impact on the wider setting. The impact on the site's landscape character should be considered moderate adverse due to the loss of agricultural fields and their locally important pastoral character. If the site were to be selected for the delivery of sport pitches careful consideration should be given to the siting of pitches, club house and car park to limit their impact on the existing hedgerows and tree cover and the adjoining neighbours. Due to its countryside setting and potential wildlife value it would be inappropriate to use floodlighting on this site, however the site context is likely to change in the near due to the allocation of land for a mixed use development to the south of the site.		
Arboricultural and ecological comments	Floodlighting would negatively impact on bats and dormouse, would need to consult English Nature. Above and below ground constraints of oaks trees (shade across half the site, tree root protection areas run out in to field. 10m buffer zone around Devon hedgebanks. Mature crown spread plus 5m buffer zone around hedgerow standard trees.		
Strategy 3 – Sustainable Development	<i>Conserving and enhancing the environment</i> – Site E12 is within the open countryside but will be adjacent the urban area of Exmouth once the Goodmore's Farm housing and employment allocation is built out. Its enclosed nature makes it relatively well screened and so impact on the wider landscape would not be so severe as with other options. However that enclosed nature is produced by strong hedgebanks with interspersed mature oak trees forming the majority of the field boundaries and woodlands to the north making the site particularly sensitive to biodiversity and habitat harm and loss for bats and dormice. Sports pitch drainage would be required and suitable outfalls for that drainage system would need to be identified. This is a greenfield site but there is little scope for strategic additional pitch provision on previously developed land in the Exmouth area.		
	<i>Prudent natural resource use</i> – The location of site E12 on the edge of the urban area but on a relatively main road and immediately adjacent to an area of housing growth for Exmouth would encourage travel by sustainable modes (walking, cycling, bus) and discourage travel by private car thereby reducing reliance on fossil fuels and carbon emissions. Limited car parking would still need to be provided as inevitably some people will drive to the site. New clubhouse/changing facilities would need to be provided for the site.		
	<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to the facilities by foot/cycle could be considered to have better social wellbeing outcomes than if that were not possible. As the site is directly adjacent to the Goodmore's Farm housing allocation provision alongside this development could help to promote social well being in the new communities.		
	<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. This site provides the opportunity to a provide a number of football pitches with a good range of		

	<p>sizes for different age groups in one location which could help to encourage progression through age groups, spread usage out over the weekend, minimise maintenance costs and transport costs and encourage use of any social facilities provided as part of a new clubhouse.</p> <p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. Location directly adjacent to one of the key housing sites for Exmouth over the next 15 years has clear benefits.</p>
Strategy 5B – Sustainable Transport	<p>Site E12's location on the edge of the town adjacent to the Goodmore's Farm housing and employment allocation would enable users to access the site by foot, bike and public transport. There would be some improvements required for pedestrian access as part of both the Goodmore's Farm development and the development of this site. Comments from the Local Highways Authority suggest that it would be better if the site access could be relocated onto Hulham Road (currently on Exe View Road), however this would necessitate removal of a hedgebank and potentially trees which are protected by an area TPO.</p>
Strategy 7 – Development in the Countryside	<p>Site E12 is located adjacent the Built-up Area Boundary for Exmouth in the open countryside. Policy RC4 allows for new sports development in the open countryside where certain criteria are met and these are considered against that policy. The delivery of sports pitches on this site would not necessarily be in keeping with the traditional form and settlement pattern for Exmouth which has extended up the valleys of the various brooks which drain into the Exe Estuary and the sea. However over the last 30 years Exmouth has expanded significantly to the north through Brixington and Bystock and the Goodmore's Farm allocation and this development would essentially be an extension of that pattern. The enclosed nature of the site means that there would be little in the way of wider landscape impacts arising from development of sports pitches in this location. Local impacts are more significant in terms of retention of hedgebanks and mature trees with the potential for biodiversity harm and loss if removed. Floodlights would be unlikely to be appropriate in this location due to the biodiversity protection more so than landscape. The site is also in relatively close proximity to the East Devon Pebblebed Heaths with its various national and international designations for conservation and protection which would also rule out floodlights in this location. No public views would likely be disrupted through sports pitch development on this site.</p>
Strategy 22 – Development at Exmouth	<p>Sports pitch development in this location would be directly adjacent to one of the key housing sites for the town for the next 15 years and as such would go a long way towards meeting the needs for new social, community and leisure facilities for these new neighbourhoods. Delivery of pitches here would not encourage additional visitors to the Exe Estuary or East Devon Pebblebed Heaths. However, it is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.</p>
Strategy 46 – Landscape Conservation and Enhancement and AONBs	<p>Site E12 is within the wider Pebblebed Heaths and Farmland Landscape Character Area with which the site shares some distinctive characteristics. The site is located within the Lower Rolling Farmed and Settled Slopes Landscape Character Type with which again some distinctive characteristics are shared. Whilst not designated as AONB, there is a clear landscape sensitivity to this location, in particular the established hedgebanks and mature oak trees that form the boundaries of the site which must be retained and respected.</p>
Strategy 47 – Nature Conservation and Geology	<p>Bat and dormouse presence on site would mean that floodlights would be unlikely to be acceptable in this location and the hedgebanks and mature oaks should be retained and respected.</p>
D3 – Trees and Development Sites	<p>Consultation with arboricultural officers at the Council has highlighted the importance of retaining and respecting the existing hedgebanks and trees. In particular the tree root protection zones were mentioned as extending into the field. STRI's proposed plans show separate platforms developed for pitches</p>

	<p>in the eastern and western fields, both of which could potentially impact detrimentally on these root protection zones and hedgebanks as shown. More detailed plans would be required to show limited/no harm. The STRI Stage 2 Report identifies that potentially in the western field the U15/16 youth 11v11 football pitches could be reduced to U13/14 youth 11v11 size and this would reduce that impact. In addition, potentially, if Sport England/FA compliant crossfalls were exceeded slightly then the impact may be lessened by a need to have less severe cut and fill.</p>
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	<p>Consultation with the County Council’s Historic Environment team has highlighted that a programme of archaeological work may be required in this location in mitigation for any potential impact on the historic environment.</p>
EN13 – Development on High Quality Agricultural Land	<p>Site E12 is designated as Grade 3 agricultural land though it is not clear whether it falls into category 3a or 3b. As Grade 3, the site is not of the best quality but clearly has some quality and if less high quality agricultural land existed then this should be considered first, however out of the strategic Greenfield sites in question it has the lowest quality (tied with site E19, with sites E11 and E9/16 being on Grade 1 agricultural land).</p>
EN14 – Control of Pollution	<p>Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year, however, the STRI Stage 1 report highlights that the site only has moderate weed content. This may mean that less pesticide use is needed here than on some other sites. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses, and being in such close proximity to the sensitive East Devon Pebblebed Heaths and in the drainage basin for the Bapton Brook which drains into the Exe Estuary this will be of key importance. In addition to this, sports pitch usage creates noise pollution. Usage would likely be restricted to weekends and perhaps one or two evenings per week within daylight hours. The site is not in the AONB but noise impact on a countryside location will still be relevant, especially considering the adjacent woodland and presence of bats and dormice on site. The site is not especially tranquil being in such close proximity to Exmouth and Hulham Road but if necessary noise impact could be controlled through usage restrictions. Floodlights would not be suitable in this location due to the presence of bats and dormice and landscape impacts so usage would never extend too late into an evening.</p>
EN16 – Contaminated Land	<p>Site E12 is not on or in such close proximity to any contaminated land for this policy to apply.</p>
EN21 – River and Coastal Flooding	<p>Site E12 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.</p>
EN22 – Surface Run-off Implications of New Development	<p>Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.</p>
RC2 – New Open Space, Sports Facilities and Parks	<p>Site E12, whilst being in the open countryside adjoins the Exmouth BuAB and so policy RC2 is relevant. Careful design would be required to ensure that the built facilities required to accompany any pitches in this location did not unduly affect the character and appearance of the area. The physical and visual amenities of neighbouring residents along Hulham Road would also need to be considered. The site would be easily accessible by bicycle and foot once the Goodmore’s Farm development has been built out. The closest bus stop at present is on Dinan Way close to the junction with Hulham Road, but this is a relatively short walk and there may be improvements to bus services as part of the Goodmore’s Farm development. These developments could easily link in to the Valley Parks which aim to connect the north of Exmouth through to the town centre by footpath/cycleway along the Bapton Brook valley. Appropriate car parking and cycle parking could be provided on site. The existing access off Exe View Road would be suitable. Whilst ideally it</p>

	would be relocated onto Hulham Road this would not be acceptable in nature conservation and landscape terms as it would necessitate the removal of hedgebank and potentially mature oak trees. As explained above, the site is Grade 3 agricultural land, is particularly sensitive in landscape and nature conservation terms with regards to retention of hedgebanks and boundary trees and there may be archaeological interest in the site but it is the least harmful of all the potentially suitable strategic Greenfield sites.
RC5 – Community Buildings	A new clubhouse/changing facility will be required for sports pitches of this volume in this location. The site is adjacent to the BuAB.
RC6 – Local Community Facilities	Any clubhouse building will need to be designed compatible with the character of the site and its surroundings. Ideally the building should be located close to the proposed entrance off Exe View Road as possible to ensure it is not too detached from the town. The site will be accessible by a variety of transport modes including walking and cycling once the Goodmore's Farm development is completed. Traffic generated by the proposal could be accommodated on the local road network. Usage of the clubhouse facility may need to be restricted to avoid detrimental impact through noise pollution.
RC7 – Shared Community Facilities	Any new clubhouse facility would need to be available for use by other community groups and in this accessible location it is likely that it would be well used.
TC2 – Accessibility of New Development	Site E12 is well located in terms of access for new residents of the Goodmore's Farm housing site and with small improvements would be easily accessible by public transport, bicycle and foot. It is well related to the urban areas from which users will travel and has potential to be linked in to the Valley Parks footpath and cycle network that is being developed. It has the potential therefore to minimise the need to travel by car as much as possible, however many users will still travel to the site by car. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	Public footpaths currently exist along Hulham Road and Dinan Way to their junction, however no footpath extends north of that junction along Hulham Road towards site E12. As such this footpath would need to be extended and presumably would be as part of the proposed Goodmore's Farm housing and employment development. No other public rights of way access the site. There would be potential to link in to the proposed Valley Parks cycle network therefore linking the site into the town centre.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has identified that ideally the access would be moved from Exe View Road onto Hulham Road, however this would likely not be appropriate due to the loss of hedgebanks and trees and associated biodiversity. It is assumed that the current access would be acceptable and that movement of the access would just be a best case scenario.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Inevitably some car parking will need to be accommodated and landscape requirements may dictate that this is provided as a grasscrete or similar surface. Guidance from Sport England and NGBs may help in this regard.

Land opposite the Archery Club (E19)

Site ref	E19	Site name	Land opposite the Archery Club
Highways comments	The current access position would be acceptable, however it may need to be widened to allow cars to pass one another when accessing and existing the site.		
Archaeology comments	No anticipated archaeological impact.		
Landscape comments	Due to its proximity to nationally and regionally designated areas and its visually prominent location the delivery of sport pitches on this site would have moderate to major adverse landscape and visual impact. Careful consideration should be given to the siting of the pitches and the provision of ancillary infrastructure should be kept to a minimum and be of outstanding architectural design, be in keeping with the local vernacular and take account of the panoramic views.		
Arboricultural and ecological comments	Potential for bat foraging along hedgebanks. Floodlighting and noise likely to negatively impact on bats, dormouse and badgers. 10m buffer zone around Devon hedgebanks. Mature crown spread plus 5m buffer zone around hedgerow standard trees.		
Strategy 3 – Sustainable Development	<i>Conserving and enhancing the environment</i> – Site E19 is within the open countryside and in a location well removed from the urban area on the edge of the AONB and Withercombe Raleigh Common which forms part of the East Devon Pebblebed Heaths. Whilst the site itself is not inside the AONB or the Pebblebed Heaths there would be some sensitivity with locating pitches so close to them as there would be potential for biodiversity harm (particularly for bats and dormice) and detrimental landscape impact. Having said that the site is located directly opposite an existing sport pitch hub and there could be some sustainability credentials in providing pitches in the same location. Sports pitch drainage would be required and suitable outfalls for that drainage system would need to be identified. This is a greenfield site but there is little scope for strategic additional pitch provision on previously developed land in the Exmouth area.		
	<i>Prudent natural resource use</i> – The location of site E19 in the open countryside, removed from the urban area of Exmouth would discourage travel by sustainable modes (walking, cycling, bus) and encourage travel by private car thereby retaining and increasing reliance on fossil fuels and carbon emissions. Having said that, the site is directly opposite an existing sports pitch hub and many users may potentially be able to car share. Car parking is already an issue at the existing site and as such additional parking capacity would need to be provided as inevitably everyone will have to drive to the site. Similarly, additional clubhouse/changing facilities would need to be provided. STRI have shown how potentially the capacity of existing facilities on the Withercombe Common pitches site (EA) could be increased through extensions and improvements. However, if this were not possible then more facilities would have to be provided on site E19.		
	<i>Promoting social well being</i> – Providing sports pitches on this site would to an extent promote social wellbeing as it would on any of the sites, however, clearly the lack of easy access to the facilities by foot/cycle could be considered to be a barrier to social wellbeing as the site would only be accessible by car.		
	<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. This site provides the opportunity to provide up to two senior rugby pitches or a number of football pitches with a range of sizes for different age groups in one location. In combination with existing facilities at Withercombe Common pitches (EA) this could help to encourage progression through age groups, spread usage out over the weekend, minimise maintenance costs and encourage use of any social facilities provided in the clubhouse.		
	<i>Taking a long term view of our actions</i> – As with delivery of sports facilities		

	on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. Location out of town would not be the best location to meet current and future generations.
Strategy 5B – Sustainable Transport	Site E19's location detached from the urban area by some distance means that it would not be accessible by or therefore contribute to the objectives of promoting and securing sustainable modes of travel and transport. The site could not be accessed by foot or bicycle easily or public transport.
Strategy 7 – Development in the Countryside	Site E19 is located far beyond the Built-up Area Boundary for Exmouth in the open countryside. Policy RC4 allows for new sports development in the open countryside where certain criteria are met and these are considered against that policy. The delivery of sports pitches on this site would not be in keeping with the traditional form and settlement pattern for Exmouth. However, the site is located adjacent to the existing Withycombe Common pitches site (EA) and so delivery of pitches on this site could follow that pattern and in fact produce an extended sports hub. The exposed nature of the site means that there could significantly harmful landscape impacts arising from development of sports pitches (but especially built facilities) in this location which forms an important setting for the AONB. Location so close to the East Devon Pebblebed Heaths which are designated as a Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest plus potential local impacts on bat foraging and dormice means that there is potential for significant biodiversity impact. Floodlights would be inappropriate in this location due to both the biodiversity protection and landscape impact. The site is clearly visible from the local area including from the Imperial Recreation Ground in the centre of Exmouth. Significant re-profiling of the land or poorly located or designed built facilities could have a significant detrimental impact on views up to the AONB, which site E19 sits immediately adjacent to.
Strategy 22 – Development at Exmouth	Sports pitch development in this location could go a long way towards meeting the needs for new social, community and leisure facilities for these new neighbourhoods. Delivery of pitches here would probably not encourage additional visitors to the Exe Estuary or East Devon Pebblebed Heaths as people are coming to play sport, however potentially people may go on from the site to walk on the heaths as they are in such close proximity. However, it is not covered by the Habitat Regulations Assessment of the Exmouth Town Centre and Seafront Masterplan.
Strategy 44 – Undeveloped Coast and Coastal Preservation Area	Site E19 is not within the designated Coastal Preservation Area, although the site does share some characteristics in terms of visual openness and views to and from the sea.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site E19 is within the wider Pebblebed Heaths and Farmland Landscape Character Area with which the site shares some distinctive characteristics. The site is located within the Pebblebed Heaths Landscape Character Type with which again some distinctive characteristics are shared. Whilst not designated as such, the site immediately abuts the AONB and therefore provides context and setting for the AONB especially in terms of views to the AONB from Exmouth. The level of re-profiling proposed in the STRI plan for the site would have a significant detrimental landscape impact. The provision of sports pitches in this location is not appropriate to the economic, social or wellbeing of the area. As use of the site would affect the AONB it is important to understand whether the proposals could be accommodated elsewhere outside / not affecting the AONB. In this case, rugby pitches or football pitches could be delivered on less sensitive sites that do not impact on the AONB within the town and on sites E11 and E12.
Strategy 47 – Nature Conservation and Geology	Likely bat and dormouse presence on site would mean that floodlights would be unlikely to be acceptable in this location from a biodiversity perspective, as well as from a landscape perspective. STRI's proposed plans show extensive cut and fill banking although it does not affect the established hedgebanks forming borders to the site in the proposed layout. However, if an alternative layout of football pitches were provided at a perpendicular angle to the proposed rugby pitches then this could have a significant effect on the

	hedgebanks and biodiversity.
D3 – Trees and Development Sites	Consultation with arboricultural officers at the Council has highlighted the potential presence of bats and dormice and the relationship they have with the existing hedgebanks. That being the case these should be retained. The STRI proposed plans show no impact on the hedgebanks as they are but if alternative layouts were considered that detrimentally impacted on the hedgebanks then this would not be appropriate.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that there would be no anticipated archaeological impact if this site were developed for sports pitches.
EN13 – Development on High Quality Agricultural Land	Site E19 is designated as Grade 3 agricultural land though it is not clear whether it falls into category 3a or 3b. As Grade 3, the site is not of the best quality but clearly has some quality and if less high quality agricultural land existed then this should be considered first, however out of the strategic Greenfield sites in question it has the lowest quality (tied with site E12), with sites E11 and E9/16 being on Grade 1 agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year, however, the STRI Stage 1 report highlights that the site has low weed content. This may mean that less pesticide use is needed here than on some other sites. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses, and being in such close proximity to the sensitive East Devon Pebblebed Heaths and in the drainage basin for the Withycombe Brook which drains into the Exe Estuary this will be of key importance. In addition to this, sports pitch usage creates noise pollution Usage would likely be restricted to weekends and perhaps one or two evenings per week within daylight hours. The site is not in the AONB but is directly abutting it and noise impact on the AONB could be important. Having said that, the site is adjacent to an existing sports pitch site and would generally be in use at similar times. Floodlights would not be suitable in this location due to the landscape impact but also potential presence of bats and dormice so usage would never extend too late into an evening.
EN16 – Contaminated Land	Site E19 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site E19 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.
RC4 – Recreation Facilities in the Countryside and on the Coast	Policy RC4 allows for the provision of sports facilities in the countryside where a countryside location is required and certain criteria are met. Generally speaking sports pitches do not require a countryside location, however, if no more suitable sites existed within the urban area or directly adjoining then it may then create that requirement. Potential issues with facilities and cut/fill landscape impact would need to be resolved. A safe site access already exists, though pedestrian access from the existing facilities at the Withycombe Common pitches site (EA) would not be particularly safe without installation of a pedestrian crossing. If additional parking arrangements can be accommodated on site EA then discreet parking arrangements could be provided, however if they are required to be delivered on site E19 then screening planting may be required. There would be no impacts on existing public rights of way. If possible no new buildings would be accommodated on site E19, with enhancement/extension of existing buildings on site EA being the preference, but if it were necessary then facilities would need to be of minimal size and be located at the north-western end of the site so as to group it with the neighbouring buildings as

	much as possible.
RC5 – Community Buildings	It would be hoped that no new community building would be required, rather an extension to the existing building on site EA. However, if a new building were required then the site is located well outside the BuAB and as such would not necessarily be supported by this policy.
RC6 – Local Community Facilities	Any clubhouse building will need to be designed compatible with the character of the site and its surroundings and in this prominent location of landscape sensitivity then outstanding design would be important. If a new building is required it should be located close to the existing buildings that front Outer Ting Tong as much as possible to avoid sporadic development as much as possible. The site would only really be accessible by private car and as such this criterion would not be met. The traffic generated by the proposal could be accommodated on the local road network. Usage of the clubhouse facility may need to be restricted to avoid detrimental impact through noise pollution. If this site were to be chosen then it would be because no other sites were more suitable. If a new clubhouse were required then that would be because the existing clubhouse could not be suitably extended to accommodate the additional demands of this site. That being the case the need for the facility would have been proven.
RC7 – Shared Community Facilities	Any new clubhouse facility would need to be available for use by other community groups, however, in this location it is unlikely that it would be well used.
TC2 – Accessibility of New Development	Site E19 is poorly located in terms of access by public transport, bicycle and foot and would subsequently only be accessed by private car. As such it is poorly related to the urban areas from which users will travel. It would however be well related to compatible land uses in that the site is directly opposite the existing Withycombe Common pitches site. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	There are no public footpaths, bridleways or cycleways that access or cross the site. To be compliant with this policy adequate footpaths may need to be provided, however the distance from town would mean it would be still unlikely for users to access the site in this manner even if a path existed.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has raised no issues with the adequacy of the local road network for this site to be developed. However, it was suggested that the current access may need to be widened in order to allow cars to pass one another.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Inevitably as an out of town site car parking will need to be accommodated. If additional capacity cannot be delivered on site EA then it would be required on site E19 and landscape requirements may dictate that this is provided as a grasscrete or similar surface. Guidance from Sport England and NGBs may help in this regard.
Lympstone Neighbourhood Plan – vision	Site E12 is could provide enhanced provision of amenities, activities and facilities for the residents of the Goodmore’s Farm housing site, part of which falls within Lympstone parish. Delivery of pitches in this location would not add to settlement coalescence between Exmouth and Lympstone.