Site SEAT 08, Churston Rise, Seaton, Devon

We would like to support the conclusion in the 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (Page 22) that site SEAT_08 at the top of Churston Rise, Seaton, should NOT be allocated for future residential development. This Greenfield site on the western boundary of the town is sensitively located on the skyline and is a highly exposed site which can be seen from multiple viewpoints from the south and east, including an Area of Outstanding Natural Beauty (AONB), Axe Cliff Golf Club and the River Axe estuary. It can also be viewed from the seafront and mouth of the River Axe.

The adopted *Seaton Design Statement* (Page 46) states: "The land to the west and north rises towards the East Devon plateau. An important feature of the valley is the view above the developed area of a green, untouched, natural skyline." On Page 47 it states: "It is important that development does not encroach on the western slopes, in order to retain an undeveloped, natural skyline." Furthermore, Page 33 states: "Green boundaries and screening must be retained in perpetuity." Because of the rising character of this site, any attempt to build on it would erode the untouched natural skyline, which would not be acceptable.

SEAT_08's position on the Western boundary of the town is also between two agricultural fields to the north and south of it which are farmed for arable and grazing purposes on a mixed rotation. The neighbouring field to the north of SEAT_08 has similar topography characteristics in that it is also sensitively located on the skyline. Therefore, any proposal to develop SEAT_08 would potentially weaken the long term protection for neighbouring fields on the southern and northern boundaries and set a precedent to develop them, which would further conflict with the current ecological benefits provided and the untouched, natural skyline.

The site also provides a natural habitat for wildlife and enables their movement to and from the neighbouring Couchill Coppice. Site SEAT_08 is a well known site for wildlife such as adders, grass snakes, field mice, moles, foxes, badgers and various species of birds. The site is also a well known corridor used by bats, being in the Beer Quarry & Caves Special Area Conservation zone. The January 2022 bat count figures suggest there are 392 bats using the Beer Quarry Caves to hibernate, with 255 bats being of the rare Greater Horseshoe species (Source: http://www.beerquarrycaves.co.uk/bats/). Given the site's elevated location above existing dwellings in Churston Rise and Upper Churston Rise and there being no overspill of light pollution into it from this residential estate, this supports findings that SEAT_08 is an important corridor used by various species of bats.

This site also serves as a firebreak between the existing built environment and Couchill Coppice, the latter of which is recent years has seen a number of wildfires occurring. Vehicular access

into Couchill Coppice is limited to just one gateway located off Bunts Lane, while only those paths within Couchill Coppice which form part of the official Seaton Nature Trail route are maintained to be wide enough to accommodate off-road 4x4 vehicles. Therefore extending the current built up area boundary into SEAT_08 would reduce this open buffer as a protection from possible wildfires.

'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document (Page 22) states there are currently "private land - no public right of way" signs erected on some of the entrances into the site. These were erected in May 2022. The report correctly concludes that the site is well used for informal recreation, with documented evidence submitted by users of the field to the Rights of Way team at Devon County Council confirming it has been used for nearly sixty years, supporting the high amenity value it offers to users.

Allowing any development to take place on SEAT_08 would also place further strain on the current drainage system in Churston Rise and Upper Churston Rise which in the last five years has seen utility companies undertaking numerous major repairs at various locations because of collapsed pipework. This would suggest that building any further dwellings in the estate, such as on SEAT_08 would add further demand on an inadequate and failing drainage system.

In conclusion, this evidence demonstrates the impact any development on site SEAT_08 would have on eroding the skyline and special backdrop for Seaton on the Western boundary. It would also have an adverse impact on safeguarding wildlife habitats, including those that are protected species, the loss of a firebreak and also of a site where there is robust evidence that it has been used for amenity purposes for nearly sixty years.

Based on these reasons, we therefore support the recommendation in the 'Appendix 2: Site Selection – Interim findings at Tier One and Two Settlements' document that site SEAT_08 should NOT be allocated as a site for future residential development.

We trust our <u>opposition</u> to any attempt to build on this Greenfield site on the Western boundary will be considered as part of the East Devon Local Plan consultation process.

Mr and Mrs D. Kingdon