

Evidence against development of EXMO_17

Site 17 is a large, sloped site area of open space that is to the east of the historic Village of Littleham. The entire site is within the Area of Outstanding Natural Beauty (AONB) and sits outside of the built-up area boundary (BUAB). It contains a network of agricultural fields that are currently farmed and a well-established walkway and cycle path, as well as the Littleham Brook and multiple Historic Environment Records (HERS). In the current neighbourhood plan the AONB is a designation that recognises the protection of its special landscape as being of national importance, equal to landscapes of our national parks. It also states that development outside of BUAB will not be supported.

Photographs supporting the unique and special nature of the landscape are included at the end of this document.

Infrastructure

According to the draft plan there is no direct infrastructure concerns, but if developed there would be large scale infrastructure needs. The whole site currently does have direct infrastructure concerns. South of the site is Castle Lane, a single narrow country lane with no pavement which is in a high flood zone area (as per the current Environment Agency Flooding Plan) due to proximity to Littleham Brook and surface water run-off. West of the site is Capel Lane, a narrow road, which is sealed off to traffic 1/3 of the way up and is busy already with traffic accessing Littleham Village and the surrounding housing estate. Site 15 would have its access from Capel Lane, and this currently has a tall hedgerow across and is on one of the narrowest parts of the Lane, close to another road junction. Both Capel Lane and Castle Lane join Littleham Road which can be busy with traffic especially when Devon cliffs and World of Country life is open. Access through Littleham Village can be busy due to the bridge access near the Clinton Arms being for single traffic despite being widened in the 1930s. North of the site is B3178 (Salterton Road), a busy main road. The site access that would need to be created is opposite a very busy junction off Liverton Business Park. It is also where the local Ambulance and Fire Station is based. Recently the junction was extended to help ease traffic but has not been effective. Further down (Salterton Road) are traffic lights, but traffic lights here would be ineffective due to the increase in stationary traffic it would cause. There are no public pathways along the site's boundary with Salterton Road and it would be difficult to create a public crossing as Salterton road slopes downwards and vision would be poor for oncoming traffic.

North of the site is next to a very large underground water reservoir and there is evidence of underground piping going southwards through the site, possibly a private network. There is also Littleham ponds which are evidenced on the current OS maps. Littleham Brook runs east to west, south of the site with a pumping station further up.

Running east to west through the middle of the site is the former historic Exmouth to Budleigh railway line which is now a well valued cycle path and walkway. It forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole. This is a valued form of green infrastructure valued by not only the local community, but further afield as well. There are 9 design principles to be on the Sustrans including its attraction and enhanced ecological features as well as being safe and accessible traffic free paths. It is currently a free to use and safe path for cyclists and walkers of all ages and accessibility needs, with no risk of potential harm from vehicles. It also helps to support both health and wellbeing of the community, deliver wider benefits for nature and support efforts to address climate change (an issue raised in the NPPF, p27 paragraph 92c and p28 paragraph 98).

The site sits outside of the BUAB and is further away from local amenities and the town centre. The local historic Littleham village contains a pub, 2 community halls and a seasonal tearoom, but no shops. The closest supermarket and post office from the furthest part of the site would be more than 1600 metres. There is a small Primary School in Littleham but would be some distance from the furthest part of the site. Other primary schools and the only secondary school would not be within walking distance. The bus service is unreliable and the only bus directly to Exeter is at Littleham Cross (a 25-minute walk from the closest area of the site). The closest train station is on the outskirts of Exmouth town centre and therefore not local to the site. These issues alone would add to more burdening traffic and an increase in pollution and carbon emission.

Landscape

Site 17 is protected by the Countryside and Rights Of Way Act 2000 (CROW). It protects the land to conserve and enhance its natural beauty. AONB require good quality scenic landscape that is relative wild due to distance from housing or having few roads, where natural sounds is predominant. It can also include natural heritage features such as habitats and cultural heritage.

I agree that site 17 is very sensitive in landscape terms due to its location and visual prominence. The whole site sits within the AONB and sits above the local built-up area. The fields are currently used for agricultural use by the local farms and is rated as good to moderate. The site slopes north to south which offers extensive views into and out of site including from looking into and out of the AONB and the Southwest Coast Path. The whole site is also in the Coastal Preservation Area and borders onto the Jurassic Coastline which is part of the UNESCO World Heritage Site. I disagree that the higher northerly parts are starker, as further north of the site offers some of the best views in Exmouth of the far-reaching views of the AONB, Maer Valley and coastline. The whole site has a particular tranquillity of peace away from traffic and the built-up areas of Exmouth and a distinctive rural countryside feel, that over the years, other areas of Exmouth has lost to development. The site is also intimate in nature with mature hedgerows and trees, including 2 trees with a TPO. Littleham Brook south of the site, also supports the local natural habitat. The site boarder's local woodland areas, private gardens, and the local churchyard. Currently the churchyard west of the site is an established biodiversity for the local flora and fauna. The whole site offers a habitat as well as a wildlife corridor for local wildlife including Bats, Birds, Hedgehogs, Deer, and Badgers.

Looking at the Valley Parks and working draft plan for Exmouth, site 17 is a suggested area of land of local amenity importance due to being outside of the BUAP and in the AONB and could easily join up to the Maer Valley Park, a supposed greenspace for the community to access and enjoy.

The site would also make a wonderful Dark Night at Skies protected area due to having very little light pollution facing eastwards and the only light comes from the odd farmhouse. The dark skies also help to support the local nocturnal wildlife.

Paragraph 84 of the NPPF supports the need of open space.

Exmouth Site 10, land to the North of B3178 (Salterton Road) was rejected for similar reasons that site 17 has. Site 10 consists of improved grassland fields that are open and exposed in landscape terms and large parts have a rural rather than urban fringe character. There are some hedgerow boundaries with some mature trees. The views from the site are open and exposed, including long distance views. Easterly parts of site are remote from services and facilities and if developed would form a quite large 'tongue of development' projecting into open countryside with visual impacts on areas of open countryside and designated AONB. The site itself is not in the AONB. If site 10 can be

rejected for development for these reasons, then so should site 17, which is in the AONB, has better views and quality land, and can be seen from the South West Coast Path.

Historic

Littleham has a long significant history and is older than Exmouth. It was a Saxon subdivision with its own court and was retained by the Kings of Wessex until the 11th Century when it was given by Edward the Confessor to his Master Ordgar, who then passed it onto the Monastery (Horton in Dorset 970 AD) who held it until the Dissolution of the Monasteries, before descending into the Rolle Family and Lord Clinton. The area has historically been forested and agricultural and used by local Farms including Liverton and Woodlands, once part of the Manor of the Wade in the 1300s. The Drake family are also well linked to the area, having lived at the now Prattshayes in the village, funded the Drake Aisle in the church and being buried there. It's mentioned in the Domesday record of 1086. Over the years the Village has grown and changed. The only area that has relatively unchanged (apart from some former buildings and railway line) is the area that borders Littleham including site 17 with its long agricultural history.

On the proposed plan, very little detail is given regarding the local listed church compared to other sites that have been rejected such as site 07 in Exmouth, Bystock Court, which is grade 2 listed. St Margaret's and St Andrews Church, which borders the site is grade 2* which carries much more of a historical significance. Nowhere does the plan mention its grade 2* status. All the plan states is that there is a listed Church to west of site and is of prominence in views and setting for southerly parts of the site as much of the site is remote from church. The site is not remote from the church. The church forms part of the special distinctive village and rural country feel of the whole site and is a significant heritage asset and has a direct impact on potential scope for accommodating residential development. To have an intensification of urban activity and vehicle movements, could adversely impact on heritage value as could other aspects of urbanisation. One example would be the potential over use of the public access through the churchyard, from site 17 to Littleham Road, south of the site.

On the proposed plan it also states that there are no other identified designated heritage features that would impact on site. However, when looking the Historic Environment Records (HERS) there are multiple HER Monuments. The first being that Littleham is the bounds of the original Saxon Manor (MDV41872). The current parish boundaries are unchanged since Edward the Confessor or possibly earlier and the site has always been rural. Others include the 19th Century churchyard (MDV112441); the Exmouth to Budleigh Salterton Branch line Railway (MDV22498); Pond to the East of Capel Lane shown on previous maps including the Littleham Tithe Map of 1844 and is on current OS and Google maps (MDV111969); Extraction Pits on northern part of the site, of probable Post Medieval to Modern Earthwork Pit on aerial photos of 1950 onwards and LiDAR 1998-2012 (MDV106427 and MDV106428); Extraction Pit to the South East of probable Post Medieval to Modern and is visible as an earthwork pit on aerial photos 1946 onwards and on digital LiDAR images 1998-2012 (MDV196331); Pond to the South of Salterton Road on Tithe Map of 1844 and OS Maps (MDV111967); Extraction Pit to the Northwest (MDV106423); possible field boundary to south of Liverton Business Park. Potential Medieval to Post Medieval and visible as a two Cropmark Bank on aerial photos in 1969 (MDV106429); possible Early Medieval to Post Medieval field boundary to the south. Visible as a cropmark ditch on aerial photos in 1969; Orchard Banks to the North of St

Margaret's and St Andrew's Church, Littleham. Orchard is likely Post Medieval to Modern. Linear earthwork banks on aerial photos 1946 onwards and digital images taken in 2010 (MDV106422); Earthwork Pit to the north of St Margaret and St Andrews Church, Littleham. Probable Medieval to Post Medieval in origin and is visible on aerial photographs 1950 onwards and LiDAR images 1998-2012. This could possibly be the former Manor House built in the 15th Century and known as The Lords House; and Buildings to the East of Capel Lane (MDV111334).

Local to the site are several other listed buildings. These are the Lichfield Gate to the churchyard (grade 2) near the bottom of Littleham road and 1-5 Castle Cottages (grade 2 and HER Monument MDV51057) which are visible from the site and near potential access to the site. Further away in the village are, Littleham Tithe Barn (grade 2), Mundy's Farm and cottage (grade 2), Green Farm (grade 2) Prattshayes Farm (grade 2) and 2 sets of Gate piers and iron gates at Prattshayes.

The churchyard which borders the site contains several prominent resting places including the tomb of Lady Nelson as well as war graves.

Littleham Village on the current neighbourhood plan is a potential site for a new conservation area, which it deserves to be.

Ecological

In the NPPF paragraph 174, planning policies, and decisions should contribute to and enhance natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity; recognise intrinsic character and beauty of the countryside and its wider benefits. The site is seen as being favourable from an ecological perspective on the proposed plan. However, many ecological considerations have not been considered. AONB positively enhance their beneficial use, provide access and opportunities for recreation, as well as retain and enhance the landscapes visual amenity and biodiversity. The site may not be part of the Pebblebed Heaths on Woodbury Common, but the site does act as a wildlife corridor towards this and is in the AONB. From site 17, you can access Woodbury Common, which is not far away for wildlife. Site 17 is also near World of Country life, that promotes the local habitat for bees and other insects. Also at night site 17, does not suffer from artificial light pollution, which helps to support our nocturnal wildlife.

Paragraph 176 in the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONB which have the highest level of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and are given great weight to avoid or minimise adverse impacts on designated areas. There are many local features of interest, notably mature hedgerows, and trees, including Oak trees, which help support the local wildlife. The site is near local woodland and the bordering churchyard offers a biodiversity of local flora and fauna including a habitat for butterflies, birds, bats, and other insects. In certain parts of the churchyard, the grass is not cut to help provide biodiversity. The churchyard also contains a natural burial ground which backs onto site 17. On first looks of site 17, agricultural fields are seen, but on further inspection, the site offers a well-known wildlife habitat for various species including bats, various birds including Green Woodpeckers, badgers, deer, dormice, adders, rare wood crickets, butterflies, dragonflies, and plants. This is signposted on the information boards along the cycle path and walkway that runs through site 17. To develop this site would have a vast detrimental affect on the local wildlife that would permanently destroy their habitats. NPPF paragraph 180 when determining planning applications consider if significant harm to a biodiversity resulting from development cannot be avoided, adequately mitigated, or compensated for it should be refused. This is further

supported by the Governments 25-year Environment Plan which sets out goals for improving the environment within a generation and leaving it in a better state. Also, the current landowner of site 17, Devon Clinton Estates on their website states the following: “Doing today what is right for tomorrow”; “By handing on the land to future generations in a better condition”; “By investing in the local community” and “Everything we do is with tomorrow in Mind”. To continue these principles, site 17 should not be developed. The site should be protected from development and the local wildlife habitats and landscape saved for future generations. It is also important to recognise that (P35 paragraph 120b of the NPPF) when making effective use of land, some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation, carbon storage and food production.

The East Devon AONB Support farming in the AONB to help protect habitats, species and support local communities in sustainable farming. Over 90 percent of the UK population live in areas where local government has declared a climate emergency. With native species and habitats in decline like never before, AONB partnerships have made a formal commitment of their own to increase scale and pace of delivery of nature in form of the Colchester declaration.

Accessibility

On the proposed plan it is stated that parts of site fall within 1600m of facilities; parts of the site are close to a frequent bus service and that Littleham village is to the south of the site with an industrial estate to the north, though it is across a busy main road. There is no mention that site 17 is outside the town boundary and is one of the furthest sites away from the town centre. The closest bus service predominantly only covers Exmouth. Buses to Sidmouth are infrequent and to go to Exeter, the best option is to catch the 57 buses from Littleham Cross, which is at least a 25-minute walk away from the closest part of the site. The closest supermarket would more than 1600 metres from the mid to furthest part of the site. There are no shops in Littleham Village and the only amenities are the pub and tearoom. The local primary school on the furthest part of the site would unlikely be in walking distance. The only secondary school is most definitely not in walking distance and the local bus does not go near the secondary school. The secondary school is in cycle distance along the cycle path after Littleham Cross but may not be suitable after dark due to it backing onto gardens from both sides with limited street lighting. The local train station is in the town centre, which is a lot further than 1600 metres from the closest site and would be at least a 60-minute walk. There is no pathway along Castle Lane and no pathway directly outside the site on Salterton Road. The main accessibility along the site is from the cycle path and walkway. Traffic through Littleham can be busy when Devon Cliffs and World of Country life are open. Most employment opportunities are in Exeter, and there are only 2 main roads out of Exmouth due to its location, which are already struggling with excess traffic and will only worsen with more development.

Site Constraints

On the proposed plan it states that there are no significant site constraints, but there would be expected local constraining within the site due to its size. I disagree with this. This site does have significant site constraints. Firstly, the sites ecological value to the local habitat and wildlife which would be permanently destroyed if development was to go ahead. Secondly the green infrastructure of the former railway line which is now part of the well-established cycle path and walkway. It forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole. This is a valued form of green infrastructure valued by not only the local community, but further afield as well. There are 9 design principles to be on the Sustrans including its attraction and enhanced ecological features as well as being safe and

accessible traffic free paths. Its currently a free to use and safe path for cyclists and walkers of all ages and accessibility needs, with no risk of potential harm from vehicles. It also helps to support both health and wellbeing of the community, deliver wider benefits for nature and support efforts to address climate change (an issue raised in the NPPF, p27 paragraph 92c and p28 paragraph 98). This could easily be lost through development due to having to meet set criteria. Paragraph 100 p29 of the NPPF, discusses that planning policies and decisions should protect and enhance public rights of way including current access links to national trails.

The site is boarded by both a busy road and 2 lanes, which would struggle to cope with increased traffic as well as adding to increase both environment and noise pollution. There are very limited foot pathways with none on Castle Lane (and unlikely to be) and none outside the site on the busy B3178 (Salterton Road). The only lane that has footpaths is Capel Lane, although not along its full length. The site sits within the local AONB and is outside the BUAB which is on the neighbourhood plan. Within site 17 there are mature hedgerows and trees including Oak, with 2 trees having a TPO. North of the site is the SWW underground reservoir with evidence of possible private piping near this on the site. Devon Air Ambulance are also known to use part of the site to land the helicopter in an emergency for this side of Exmouth. The site also contains multiple HERs and borders the local grade 2* church and its surrounding 12-acre churchyard.

Inappropriate development in green belt land including AONBs is treated as being harmful and in paragraph 144 of the National Planning Policy Framework (NPPF) paragraph 172, is a reason for refusal in general development control in AONBs.

The Exmouth Neighbourhood Plan argues against any development outside the current BUAB due to the amount of housing development within Exmouth without any provision to improve local infrastructure and does not support any development outside of the BUAB.

According to the National Flood and Coastal Erosion Risk Management strategy for England and the South West River Basin Direct Flood Risk Management Plan 2021 to 2027 (December 2022 by the Environment Agency), Littleham is in a flood risk area (FRA). Due to its location, Littleham and parts of site 17 are at risk of fluvial flooding from the Littleham Brook, surface water flooding from runoff and flooding from the drainage network due to the inability of the sewage network to cope during high rainfall and tidal locking. All forms of flooding impact on the local area including the environment, listed buildings, homes and businesses. Littleham, as per the government website, is currently a high-risk area of surface water flooding. Littleham and part of site 17 is in a high-risk fluvial flood zone, which is greater than 3.3% Annual Exceedance Probability (AEP) and not flood zone 2 which is 0.1% AEP on the current draft plan. Within Littleham village there is a history of flooding from the Littleham Brook and surface water runoff from Castle Lane and the Devon Cliffs access road to the south. Replacement of the road culvert has alleviated much of this flooding, but there is still surface flooding in Maer Lane. Due to the area becoming more urbanised, resulting in more surface water runoff and the aging drainage infrastructure there is an increase in risk level. This will only worsen with more development and climate change. Rainfall intensity is expected to increase in the future and cause higher river flows and levels with rapid run off from upper catchments and more flooding. The middle part of Littleham Brook flows through an urban area which will see an increase in flood frequency and impacts. This is also partly due to the limited scope to increase the capacity of the structures that cross the Littleham Brook which may further constrict flow. Tide locking of the outfall of Littleham Brook into the sea will also occur more frequently due to sea level rise. It is also expected to frequently overload the aging sewage network, placing a greater reliance on pumped systems to disperse the drainage and an increase in pollution. Flooding is also discussed in the NPPF chapter 14 that inappropriate development in areas at risk of

flooding should be avoided by directing development from higher risk areas, so as not to increase flood risk elsewhere. All plans should apply a sequential risk-based approach to location of development and consider all sources of flood risk both now and in the future and to safeguard land from development that may be required for future flood management.

Site Opportunities

Site 17 on the proposed plan is stated as being a large-scale site, that if it is allocated for development as a whole or just parts, it would be expected that a mixed-use development could deliver a range of positive outcomes. I disagree with this. The site is currently used for farming, which is vital if we are to become sustainable. Also, with the closer proximity to Exeter, most employment opportunities are in Exeter, which has better links to other areas of the country compared to Exmouth. The site sits outside of the BUAP and is further away from the town centre. Site 18 in Exmouth, which is land directly to east of Liverton Business Park and is close to site 17, is for employment allocation. Liverton business park tends to have smaller businesses that have lower employment numbers of staff required locally except for 3 businesses. There is currently no need for the site 17 to be developed for other employment uses and would be far better to be kept for farming, where there is a need.

Paragraph 177 in the NPPF states when considering applications for development within National Parks, the Broads and AONB permissions should be refused for major development, other than in exceptional circumstances where it can be demonstrated that the development is in the best public interest. Consideration of the following (a) need for development including in terms of any national considerations and the impact of permitting it or refusing it upon local economy; (b) cost of and scope for developing outside designated area, or meeting need for it in some other way; (c) any detrimental effect on environment, landscape and recreational opportunities and extent to which it could be mandated. Footnote 60 p51. For the purposes of paragraphs 176 and 177, whether a proposal is a 'major development' is a matter for the decision maker, considering its natural scale and setting and whether it could have a significant adverse impact in the purposes for which the areas has been designated or defined. There is no clear definition of a major development, but in the NPPF glossary, it is described as a site of more than 10 houses or a site bigger than 0.5 hectares. For site 17, I would consider this as being a major development in the AONB.

The housing that is needed in Exmouth is affordable housing for the local community, rather than new houses on the open market (this is supported by NPPF paragraph 78 p21). Brown field sites not allocated for housing, could be used as Entry level exception sites for first time buyers and those looking to rent their first home. Entry level exception sites are not permitted in AONB and green belt areas (p19 paragraph 72b of the National Planning Policy Framework, 2021).

As large-scale developments tend to have very little affordable housing, I can only imagine developers using this to their advantage and limiting the number of affordable homes and instead build unwanted expensive houses that the community does not need and cause a major destruction of the AONB.

Paragraph 73 p20 of the NPPF, describes larger scale development as significant extensions to existing villages and towns, that need to be well allocated and designed and supported by necessary infrastructure and facilities including a genuine choice of transport modes, economic potential, and

scope for net environmental gains. Also, when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre (NPPF paragraph 88 p25). Site 17 sits outside of the BUAB with poor road infrastructure both locally and outside of Exmouth. Public transport is poor in this area and the site is not well served by local amenities. In the healthcare sector, emergency health care and Gp practices are struggling and there are long waiting lists to join an NHS dentist. There is only 1 local Acute Hospital in Exeter.

Due to location of site 17 in the AONB, the opportunity is there for further environmental net gains, provided it is kept free of development such as building on the current biodiversity and habitat protection the site offers. An economic potential is to retain the cycle path and walkway, which also supports green tourism and maintain the rest of the site for agricultural use. This helps to support sustainability and the health and wellbeing of the community.

Brief Summary

I agree that the whole, the site would be a poor choice for allocation of development, even if only a part of it was developed. Even sites 9 and 15 are considered major development within the AONB, as in appendix 2 in the NPPF a development of more than 10 houses or the site is 0.5 hectares, or more is seen as a major development. Also, the chances are high that any potential housing would be unaffordable for the local community. With the government housing target numbers relaxing and considering the existing character and density of Exmouth, it is a great time to review the housing requirements for Exmouth.

The site sits within open countryside inside the AONB and is outside of the BUAB. The site offers far reaching views and feels separate from the urban sprawl of Exmouth. The site has a local intrinsic value that is enjoyed by both the local community and those from further afield. The site has an already established green infrastructure that is enjoyed by those of all ages and abilities and is part of the well-known National Cycle Network and is a viable habitat for the various local wildlife and not of low ecological value as stated in the proposed plan. This would be permanently destroyed with development.

The site also borders the grade 2* village church, which is a significant heritage asset and development of the site could have a significant detrimental effect on both the church and the surrounding graveyard and its biodiversity. There are also other grade 2 listed buildings near by as well as HERs.

For employment reasons, the site is currently used as agricultural land, which it has been for many years. To be sustainable, we need our farmland, so we can try to be more carbon neutral and support local farm businesses. If this site was developed, this would be lost forever.

The site if developed, would raise significant issues about suitability and desirability of accommodating a major large-scale development in the AONB. The NPPF discusses sustainable development for plan making, and the application of policies in this framework seek to protect areas or assets of particular importance and provides strong reason for restricting overall scale or type of development or destruction of landscape in AONB. The effects of pollution on health, living conditions, natural environment as well as the potential sensitivity of the site that could occur from development should be identified. This includes both air quality, light pollution, and excess noise from traffic. Rejecting site 17 for development will help to protect this tranquil area which has remained relatively undisturbed by noise and pollution. The site is currently prized for its

recreational and amenity value including the current habitat and biodiversity; the dark landscape at night, which can aid nature conservation and the cycle path and walkway. To develop site 17 would only lead to increase in noise, pollution and destruction of the local wildlife habitats and amenity value including the health and wellbeing of the community. Also, the site prevents the urban sprawl of Exmouth encroaching further into the much-needed countryside.

In November 2022 Historic England and AONB signed joint statement to manage, conserve and celebrate our iconic historic environment. This helps set a precedent on the value that AONB can offer not only the local community, but nationally as well. Too much land designated in the AONB has been lost to development nationally and now the government would like to increase the number of AONBs. Site 17 location carries a significantly high amenity value compared to sites that are not in the AONB or near conservation areas. It is a both wildlife corridor for this side of Exmouth and a link to the proposed Mear Valley Park.

With the policies regarding the AONB and the NPPF, development should not be considered if in conflict with neighbourhood plans. Site 17 being outside of the BUAB is not supported on the neighbourhood plan.

Many sites with similar characteristics to site 17 have been rejected, with the issues raised considered significant enough to reject other sites given less weighting for site Exmouth 17. For example, Exmouth site 07 has been rejected due to its proximity to a Grade 2 listed building, but this reasoning has not been applied to Exmouth site 17 which borders the more significant higher graded Grade 2* Church in Littleham. Other examples are as follows:

Broadhembury 07, reasons for rejection include high landscape value as it lies within the AONB, and impact on local listed buildings, reasons which are also true for Exmouth 17.

Budleigh Salterton 05, reasons for rejection include the existing field forms being an attractive feature and development could affect the setting of designated and non-designated heritage assets. These reasons equally apply to Exmouth site 17 but have not been included in the plan.

Chardstock 01, reasons for rejection include being in an AONB and having high landscape sensitivity. Both reasons apply to Exmouth site 17. Confusingly, another reason for rejection is that the site is bordered by agricultural fields despite local residential development providing some context of built form. Whereas this reasoning is turned upside down for Exmouth 17, where the local residential development providing some context for development is used as a benefit for development. The argument can not be used both ways.

Clyst St Mary – Sowton 01, reasons for rejection include development affecting the special character of local listed heritage assets. A reason which holds true for Exmouth site 17.

Clyst St Mary – Sowton 02, reasons for rejection include having a high landscape sensitivity to new development, a reason which holds true for Exmouth site 17.

East Budleigh 01, reasons for rejection include location of the site within the AONB and the effect of development on local heritage assets. Reasons which are also true for Exmouth site 17.

Exmouth 10, reasons for rejection include the open and exposed nature of the site in terms of landscape and its rural rather than urban fringe character. This site is particularly noteworthy since it is located on the opposite side of the B3178 (Salterton Road) from Exmouth site 17. These characteristics apply equally to Exmouth site 17, therefore Exmouth site 17 should be rejected since in addition to its open landscape and rural character, also lies within the AONB.

Hawkchurch 02, reason for rejection being the rural, agricultural character of the site, a characteristic shared with Exmouth site 17, despite Hawk 01 being outside the AONB.

Honiton 04, reason for rejection being development would have a high landscape impact and the site being within the AONB. Both being reasons against development within Exmouth site 17.

Honiton 09, reason for rejection being the site falling within the AONB and having a high impact on the landscape. Despite the site being located next to a major A30 junction and sandwiched between the A30 and Langford Road. Surely the landscape impact of development within Exmouth site 17 must be greater.

Honiton 12, reason for rejection being the impact of development on landscape and heritage due its location within the AONB and the adjoining grade 2* church. This is the same situation as Exmouth site 17. Therefore, surely Exmouth site 17 must be rejected for the same reason.

There are many other examples of this inconsistent approach to assessing the development potential of Exmouth site 17, which are too numerous to detail here. It is apparent that only the benefits of the development of Exmouth site 17 have been considered any negative impacts glossed over by the plan as it stands. Prior to adoption of the plan, Exmouth 17 must be reassessed as it does not appear that a full assessment of the site has been conducted. A full assessment of the benefits and negative impacts of development within Exmouth site 17 could only conclude that the site be rejected for development within the East Devon Local Plan.



Photograph 1: view looking south towards Littleham Village from old railwayline.



Photograph 2: view looking east through EXMO_17



Photograph 3: looking north west from old railway line towards northern part of Capel Lane



Photograph 4: looking north from old railway line towards Mountain Farm.



Photograph 5: Looking south east from old railway line over EXMO_17



Photograph 6: Looking south east towards Littleham church



Photograph 7: view looking east through EXMO_17 back towards Littleham.