

## Site SEAT\_08

I 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. On the eastern boundary the site can be seen nearly two miles away from viewing points such as from the B3172 Waterside road linking Seaton and Axmouth, the Area of Outstanding Natural Beauty (AONB), Axe Cliff Golf Club, the Wetlands nature reserve and the River Axe estuary. It can also be viewed from the seafront and mouth of the River Axe on the southern boundary, as well as from various locations within the town.

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." Moreover, 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." Page 33 states: "Green boundaries and screening must be retained in perpetuity." Because of the rising character of this site towards the western and northern boundaries, any attempt to build on it would erode the untouched natural skyline.

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. As with site SEAT\_08, the neighbouring field on the northern boundary predominantly shares a Landscape Character Type (LCT) 2A which "comprises the steepest land below the plateaux, and forms a series of narrow 'ribbons' which wrap around the tops of the valleys and form their backdrops," (*East Devon Land Character Assessment, 2019, page 42*). It states that the 'Landscape Aims' are to: "retain the distinctive and attractive pattern of irregular fields which provide a dramatic but soft backdrop for the valleys below," (*East Devon Land Character Assessment, 2019, Page 44*). The 'Plan' is: "Retain the overall undeveloped character of the LCT. Retain undeveloped horizons at the top of the scarp. These often form the skyline in views from below, and any development here would be very prominent," (*East Devon Land Character Assessment, 2019, Page 45*). 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, various species of birds (including barn owls) and also deer. The site is also a well known corridor used by bats (for foraging and commuting), being in the Beer Quarry & Caves Special Area Conservation zone, with the January 2022 bat count figures suggesting 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.

A further consideration is the fact this site also serves as a firebreak between the existing built environment and Couchill Coppice, the latter of which in 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. There is no vehicular access across SEAT\_08 or the adjacent fields to the north and south of it to provide entry for fire response 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. The *'Appendix 1: Site Selection Methodology'* document does not consider as part of its methodology issues of existing inadequate or maintenance needy drainage systems as 'Other known site constraints', through checking with utility company records when assessing

potential new development sites as part of the Strategic Housing and Allocation Assessment's (SHLAA) Stage B assessment criteria.

The current *2013 – 2031 East Devon Local Plan* (adopted 28<sup>th</sup> January 2016) states under Strategy 25 for 'Seaton: The Future' that: "We will enhance Seaton's role as an attractive place to live, work and visit by: "b) Ensuring the conservation and enhancement of the world-class natural environment, understanding of its value, and non-damaging access to it as well as recognising Seaton and surrounding important built heritage assets. e) Restricting any further significant housing developments beyond the existing Built-up Area boundary by locating the majority of the required 150 houses within the existing town," (Paragraph 13. 6, Page 82).

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 which are protected species, and their foraging and commuting support systems, 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. In addition, current site appraisal methodology has not identified the current problems existing residents are facing with an inadequate and failing drainage system.

Based on these reasons, I 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.