

Feedback on potential development sites at Exmouth and Lympstone in respect of Coastal Preservation Area and Green Wedge designation as well as further potential development land

August 2024

In the Spring of 2024 we undertook further consultation on the East Devon Local Plan under Regulation 18 of the plan making regulations. This consultation ran from Thursday 16th May 2024 to Thursday 27th June 2024.

The consultation was centred around a series of topic matters, see [Further Draft Local Plan Consultation - East Devon](#) with three, in particular as noted below, specifically relevant to potential land allocations for development in areas covered by this report.

- Green wedge areas,
- Coastal Preservation areas, and
- New Housing and Mixed Use Site Allocations

We received consultation feedback through the Commonplace on-line consultation platform as well as receiving feedback in the form of emails and pdf documents that were sent in directly. This report primarily draws on information received through the consultation portal. We have used Artificial Intelligence (AI) to produce the summary comments contained in this report. We would stress, however, that the AI outputs have been reviewed and considered by officers alongside original submissions. The AI outputs are regarded as providing an accurate and very useful summation of matters raised in feedback and the strength of comment. All comments made through the online system can be viewed at: [Have Your Say Today - East Devon Local Plan Further Consultation - Commonplace](#)

To date we have not summarised non-on-line submitted comments that we received, though from officer review we would consider that those submitted by members of the public are in line with the sentiments and views expressed through the on-line route. There were, however, also some comments made by agents (typically acting for land owners promoting development) and by various bodies and organisations that did not come in through the portal. In these non-general-public submitted comments there were some differing views expressed (differing to the general public

feedback that tended to be opposed to development). We make some specific note in this report to some of the concerns raised.

We would highlight that this further round of Regulation 18 consultation should be considered alongside the first Regulation 18 consultation that we undertook and which ran from 7 November 2022 to 15 January 2023. Comments from the first round of consultation can be viewed at [Comments made during the Draft Local Plan Consultation and Feedback Report - East Devon](#)

To gain a full picture of feedback both sets of comments should be reviewed. It may well be that some individuals and organisations did not comment at the second round of consultation as they considered that they had raised all relevant matters that they wished to comment on at the first stage of consultation.

Green Wedge – non-site-specific comments for all locations in East Devon

We asked two questions in the further consultation that were relevant to Green Wedge matters in general, they are therefore applicable across the District. The questions asked and the summary feedback received are set out below.

Do you think that sites proposed for new housing or employment development should be included in the Green Wedges (would the development be appropriate inside a Green Wedge?) or should the Green Wedges be redrawn to exclude them?

Summary: The responses to this question overwhelmingly oppose including new housing or employment development within Green Wedges. Most respondents view Green Wedges as important areas that should be protected from development to maintain separation between settlements, preserve local character, and protect the environment. There is strong sentiment against redrawing Green Wedge boundaries to accommodate development, as many feel this would undermine the purpose and integrity of Green Wedges. A small minority support some limited development within Green Wedges or redrawing boundaries in certain circumstances.

Key points raised, in order of frequency:

1. Opposition to any development in Green Wedges
 - Green Wedges should be protected from all development
 - Development would undermine the purpose of Green Wedges
2. Opposition to redrawing Green Wedge boundaries

- Redrawing boundaries would set a precedent for future erosion
 - Changing boundaries undermines the integrity of Green Wedges
3. Environmental and landscape protection
 - Preserving wildlife habitats and biodiversity
 - Maintaining green spaces for wellbeing and climate reasons
 4. Preserving settlement identity and character
 - Preventing coalescence of settlements
 - Maintaining distinct local identities
 5. Support for excluding development from Green Wedges
 - Green Wedges should be redrawn to exclude proposed development sites
 6. Infrastructure and service concerns
 - Inadequate roads, schools, healthcare facilities
 - Concerns about increased traffic and congestion
 7. Limited support for some development in Green Wedges
 - Some respondents open to limited or carefully managed development
 8. Calls for expanding or strengthening Green Wedges
 - Suggestions to extend existing Green Wedges
 - Calls for stronger protections for Green Wedges
 9. Concerns about housing needs and affordability
 - Recognition of housing needs, but not at expense of Green Wedges
 - Suggestions to focus on brownfield sites or existing urban areas
 10. Confusion or disagreement with the question
 - Some respondents found the question unclear or disagreed with its premise

Do you think the wording of the Green Wedges policy is appropriate?

Summary: The responses to the question about the appropriateness of the Green Wedges policy wording show mixed opinions, with a slight majority expressing support for the policy as written. However, many respondents, even those who generally agree with the policy, suggest that the wording could be strengthened to provide more robust protection for Green Wedges. There are also concerns about potential loopholes in the current wording and calls for clearer, more definitive language prohibiting development in these areas.

Key points raised, in order of frequency:

1. Support for the policy wording as is
 - Many find it clear and appropriate
 - Seen as important for maintaining settlement identity
2. Calls for stronger, more definitive language
 - Suggestions to prohibit all development in Green Wedges
 - Concerns about potential loopholes in current wording
3. Need for clearer definitions and less ambiguity
 - Some find the wording confusing or open to interpretation
 - Calls for more specific criteria for what constitutes a Green Wedge
4. Requests to reinstate or add environmental protection aspects
 - Mentions of wildlife corridors, biodiversity, and ecological importance

- Desire to include health and wellbeing benefits of green spaces
- 5. Concerns about policy implementation and enforcement
 - Questions about how strictly the policy will be applied
 - Worries about potential overrides by developers or planners
- 6. Suggestions for policy expansion
 - Proposals to include more areas as Green Wedges
 - Calls for broader protection of rural character
- 7. Criticisms of the policy concept
 - Some view it as too restrictive for necessary development
 - Concerns about hindering economic growth
- 8. Support for the principle, but doubts about effectiveness
 - Agreement with the intent, but skepticism about practical application
 - Worries about gradual erosion of Green Wedges over time
- 9. Requests for simpler language
 - Some find the wording too complex or technical
 - Calls for more accessible phrasing for non-experts
- 10. Concerns about consistency with other planning policies
 - Questions about how Green Wedges relate to other designations
 - Calls for better integration with overall planning strategy

Non-on-line submitted comments in respect of Green Wedge and Coastal Preservation Area proposals

We would highlight, however, that there were challenges to establishing Green Wedge and Coastal Preservation Area proposal in general and to specific designated locations.

There was concern raised that the way that Green Wedge and Coastal Preservation Area designations were consulted on was not in line with the requirement of a local plan to address all relevant issues. It was suggested that with potential designations falling over proposed development sites they would adversely impact on ability to secure appropriate levels of development. These designations and the way they were consulted on was also seen as potentially inappropriately distorting development site allocation choices.

There was a challenge that Coastal Preservation Area boundaries were not justified and the blanket approach applied was too restrictive and not appropriate.

There was also a challenge to the role and relevance of Green Wedge designation. The view was also expressed that there was a lack of methodology or coherent process followed to define areas that should be included. With comment that designation, if appropriate, should apply to areas where development would genuinely undermine separation and not be a blanket approach.

Natural England, however, highlighted positive opportunities that could be provided by Green Wedge designation for Local Nature Recovery Networks and biodiversity gain.

Feedback specifically relevant to Exmouth and the southern side of Lympstone

In respect of the Green Wedge area that we consulted on, in this part of the District, and noting that a number of proposed development allocations sites fall in this area, the feedback received in respect of the question asked is set out below.

How satisfied are you with the proposed Green Wedge between Exmouth and Lympstone? Why do you feel this way and do you have any other comments?

Summary: The responses to the question about the proposed Green Wedge between Exmouth and Lympstone overwhelmingly express strong support for maintaining and even expanding the current Green Wedge. Many respondents emphasize the importance of preserving the separation between Lympstone and Exmouth, protecting the village character of Lympstone, and maintaining environmental and recreational benefits. There is significant opposition to any development within the Green Wedge, particularly regarding the proposed sites Lymp_07 and Lymp_08. Concerns about infrastructure capacity, loss of agricultural land, and the impact on wildlife are also frequently mentioned.

Key points raised, in order of frequency:

1. Strong support for maintaining or expanding the Green Wedge
 - Prevent coalescence between Lympstone and Exmouth
 - Preserve Lympstone's village character and identity
2. Opposition to development within the Green Wedge
 - Particularly strong opposition to Lymp_07 and Lymp_08
 - Concerns about setting precedents for future development
3. Environmental and landscape protection
 - Preservation of wildlife habitats and biodiversity
 - Importance of maintaining the area's natural beauty
4. Infrastructure concerns
 - Inadequate roads, schools, healthcare facilities, and sewage systems
 - Inability of current infrastructure to support additional housing
5. Recreational value and public access
 - Importance of green spaces for community well-being and mental health
6. Traffic and congestion issues
 - Worries about increased traffic on local roads
 - Existing congestion problems
7. Suggestions for alternative development approaches

- Proposals for focusing development in urban areas or creating new towns
- 8. Confusion about the proposal or question
 - Some respondents found the question unclear or lacked information
- 9. Support for limited development in specific areas
 - Some acceptance of small-scale development in certain locations

Proposed Development sites in the Coastal Preservation Area

We also showed a Coastal Preservation Area that fell across parts of this Green Wedge area and also included land to the east of it. We consulted on specific proposed development allocations sites that fell in this Coastal Preservation Area. Specific comments on sites we consulted on area set out below.

Lymp_07 – Land at Courtland Cross, Exeter Road, Lympstone

We asked the question below and received the feedback summarised.

Do you have any comments on Lymp_07 being within the proposed CPA?

Summary:

The responses to the question about Lymp_07 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development in this area. Respondents emphasize the importance of preserving the natural beauty, wildlife habitats, and the distinct identity of Lympstone as a village separate from Exmouth. Many raise concerns about the inability of the current infrastructure, particularly roads, to support additional development in this area. There is a strong sentiment that this site should be included in the CPA to prevent further encroachment on the green wedge between Exmouth and Lympstone.

Key points raised, in order of frequency:

1. Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lympstone as a village separate from Exmouth
 - Protect the rural character and biodiversity of the area
2. Infrastructure concerns
 - Inability of the road network, particularly the A376, to handle additional traffic
 - Overloading of existing public services and utilities
3. Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
4. Recreational and community value

- Importance of preserving the green wedge and views for local residents and visitors
- Impact on the East Devon Way walking route
- 5. Previous planning decisions
 - Reminder that this site was previously rejected for development
 - Lack of changed circumstances to justify a different outcome
- 6. Separation of Lympstone and Exmouth
 - Concern about the merging of the two settlements
 - Importance of maintaining a clear boundary between the town and village

Exmo_23 – Courtlands Barn, Courtlands Lane (Note that this site overlaps with Exmo_11 and in other local plan work this other site reference is used)

We asked the question below and received the feedback summarised.

Do you have any comments on Exmo_23 being within the proposed CPA?

Initial Summary: The responses to the question about Exmo_23 being within the proposed Coastal Preservation Area (CPA) predominantly reveal strong opposition to development in this area. Most respondents express concerns about environmental impact, coastal preservation, and traffic issues. There is a notable emphasis on the importance of maintaining the coastal character and addressing existing infrastructure problems before considering new developments.

Key points raised, in order of frequency:

1. Environmental and coastal protection
 - Concerns about damage to the environment, coastal zones, and wildlife
 - Visual impact on the estuary and coast
2. Opposition to further development
 - Calls to stop building houses in the area
 - Concerns about traffic and infrastructure capacity
3. Visibility and landscape impact
 - Site's visibility from the coast
 - Importance of maintaining separation between areas
4. Affordable housing and local needs
 - Call for more council houses instead of unaffordable housing
5. Confusion or lack of information
 - Some respondents expressed confusion about the question or lack of information
6. Mixed views on development
 - One respondent viewed the site as sensible infill
 - Suggestion that including the site in the CPA would be more honest

Lymp_08 - Land off Summer Lane, Exmouth

We asked the question below and received the feedback summarised.

Do you have any comments on Lymp_08 being within the proposed CPA?

Summary:

The responses to the question about Lymp_08 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development on this site. Respondents emphasize the importance of preserving the natural landscape, views, and wildlife habitats in this area. Many are concerned about the inadequate infrastructure, particularly the narrow roads and lack of public transport, to support additional development. There is a strong sentiment that this site should be included within the CPA to prevent further encroachment on the green wedge between Exmouth and Lympstone.

Key points raised, in order of frequency:

1. Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lympstone as a village separate from Exmouth
 - Protect the rural character and biodiversity of the area
2. Infrastructure concerns
 - Inability of the narrow, rural roads to handle additional traffic
 - Lack of public transport options for this isolated site
3. Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
4. Flooding and drainage issues
 - Potential for increased runoff and flood risks
5. Unsuitability of the site for development
 - Concerns about the site's isolation, narrow access roads, and proximity to listed properties
6. Separation of Lympstone and Exmouth
 - Importance of maintaining a clear boundary between the town and village

Lymp_09 - Land fronting Hulham Road

We asked the question below and received the feedback summarised.

Do you have any comments on Lymp_09 being within the proposed CPA?

Summary:

The responses to the question about Lymp_09 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development on this site. Respondents emphasise the importance of preserving the open countryside, wildlife habitats, and the distinct separation between Lympstone and Exmouth. Many are concerned about the inadequate infrastructure, particularly the narrow roads and lack of public transport, to support additional development in this area. There is a strong sentiment that this site should be included within the CPA to prevent further encroachment on the green wedge and the sensitive Woodbury Common area.

Key points raised, in order of frequency:

1. Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lympstone as a village separate from Exmouth
 - Protect the rural character, biodiversity, and ecological sensitivity of the area near Woodbury Common
2. Infrastructure concerns
 - Inability of the narrow, rural roads to handle additional traffic
 - Lack of public transport options for this isolated site
3. Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
4. Flooding and drainage issues
 - Potential for increased runoff and flood risks due to the site's location
5. Separation of Lympstone and Exmouth
 - Importance of maintaining a clear boundary between the town and village
6. Unsuitability of the site for development
 - Concerns about the site's isolation, proximity to Woodbury Common, and lack of integration with existing homes
7. Landscape and visual impacts
 - Detrimental impacts on views from the Exe Estuary

Lymp_10a - Land off Hulham Road

We asked the question below and received the feedback summarised.

Do you have any comments on Lymp_10a being within the proposed CPA?

Summary:

The responses to the question about Lymp_10A being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development on this site. Respondents emphasize the importance of preserving the open countryside, wildlife habitats, and the distinct separation between Lympstone and Exmouth, especially in relation to the ecologically sensitive Woodbury Common

area. Many are concerned about the inadequate infrastructure, particularly the narrow roads and lack of public transport, to support additional development in this remote location. There is a strong sentiment that this site should be included within the CPA to prevent further encroachment on the green wedge and protected landscapes.

Key points raised, in order of frequency:

1. Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lymptone as a village separate from Exmouth
 - Protect the rural character, biodiversity, and ecological sensitivity of the area near Woodbury Common
2. Infrastructure concerns
 - Inability of the narrow, rural roads to handle additional traffic
 - Lack of public transport options for this isolated site
3. Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
4. Flooding and drainage issues
 - Potential for increased runoff and flood risks due to the site's location
5. Separation of Lymptone and Exmouth
 - Importance of maintaining a clear boundary between the town and village
6. Unsuitability of the site for development
 - Concerns about the site's isolation, proximity to Woodbury Common, and lack of integration with existing homes
7. Landscape and visual impacts
 - Detrimental impacts on views from the Exe Estuary
8. Proximity to Woodbury Common
 - Concerns about encroachment on this ecologically sensitive area

Exmo_17 - Land to the South of Littleham

We asked the question below and received the feedback summarised.

Do you have any comments on Exmo_17 being within the proposed CPA?

Initial Summary: The responses to the question about Exmo_17 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development in this area. Respondents emphasise the importance of preserving the natural beauty, wildlife habitats, and recreational value of the site. Many raise concerns about infrastructure capacity, particularly regarding roads, sewage systems, and local services. There is a strong sentiment that the area's current designations as an Area of Outstanding Natural Beauty (AONB) and part of the CPA should be respected and maintained.

Key points raised, in order of frequency:

1. Environmental and landscape protection
 - Preservation of wildlife habitats and biodiversity
 - Importance of maintaining the area's natural beauty
2. Infrastructure concerns
 - Inadequate roads, schools, healthcare facilities, and sewage systems
 - Inability of current infrastructure to support additional housing
3. Recreational value and public access
 - Importance of the cycle path and walking routes
 - Area's contribution to community well-being and mental health
4. Opposition to development in CPA/AONB
 - Criticism of considering development in protected areas
 - Concern about setting a precedent for future development
5. Local character and identity
 - Preservation of Littleham village character
 - Concern about Exmouth becoming overdeveloped
6. Traffic and congestion issues
 - Worries about increased traffic on local roads
 - Existing congestion problems
7. Flooding and drainage concerns
 - Site being on a flood plain
 - Potential impact on water management
8. Support for inclusion in CPA
 - Calls for the site to be included or remain within the CPA
9. Affordable housing needs
 - Preference for affordable or council housing if development occurs
10. Confusion about the question or proposal
 - Some respondents found the question unclear or lacked information

Exmo_50 - Exmouth Police Station – Additional potential land allocation

We consulted on this site as a redevelopment opportunity with the question and feedback received set out below.

How do you feel about the option to allocate site Exmo_50? Why do you feel this way and do you have any other comments?

Initial Summary: The responses to the question about allocating site Exmo_50 (the disused police station in Exmouth) show strong support for redevelopment, with a focus on housing. Most respondents view this as a positive use of a brownfield site within the town center. However, there are concerns about infrastructure, especially sewage systems, and the type of housing to be provided. Many emphasize the need for affordable or social housing, and stress the importance of sensitive design given the site's location near historic buildings.

Key points raised, in order of frequency:

1. Support for brownfield development
 - Preference for using brownfield sites over greenfield
 - Seen as sustainable and efficient use of urban land
 2. Housing type and affordability
 - Strong emphasis on need for affordable or social housing
 - Some calls for housing suitable for younger generations
 3. Design considerations
 - Need for sensitive development respecting nearby historic buildings
 - Current police station described as an "eyesore" by some
 4. Infrastructure concerns
 - Sewage system capacity issues mentioned frequently
 - Road network and other infrastructure (schools, healthcare) also noted
 5. Location benefits
 - Proximity to town center and facilities viewed positively
 - Seen as more sustainable than rural development options
 6. Alternative uses suggested
 - Some preference for retaining police presence or station
 - Suggestion for car park use
 7. General support for redevelopment
 - Site viewed as currently underutilized or run-down
 - Redevelopment seen as part of town improvement
 8. Concerns about overdevelopment
 - Some worry about impact on existing residents
 - Calls for infrastructure improvements before further development
 9. Environmental considerations
 - Mentions of need for sustainable features (solar panels, grey water storage)
 - Preservation of countryside by developing in town
 10. Scale and mix of development
 - Some comments on need for appropriate scale
 - Calls for varied housing types
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Feedback specifically relevant to the northern side of Lymptstone and around Exton

Proposed Development sites in the Coastal Preservation Area

We also showed a Coastal Preservation Area to the north of Lymptstone and around Exton. We consulted on specific proposed development allocations sites that fell in this Coastal Preservation Area. Specific comments on sites we consulted on area set out below.

GH/ED/72

We asked the question below and received the feedback summarised.

Do you have any comments on GH/ED/72 being within the proposed CPA?

Summary:

The responses to the question about site GH/ED/72 being within the proposed Coastal Preservation Area (CPA) express strong opposition to the inclusion of this site for potential development. Respondents emphasize the importance of preserving the site's environmental and scenic value, as well as concerns about the site's impact on the sensitive ecosystems of the Exe Estuary. There are also widespread concerns about the already strained infrastructure and services in the Lymptstone and Exmouth areas, which would be further stressed by additional development.

Key points raised, in order of frequency:

1. Objections to Development within the CPA
 - Questioning the rationale for considering development in a protected coastal area
 - Calls to maintain the established CPA boundaries and restrictions
2. Concerns about Environmental and Landscape Impacts
 - Preserving the natural habitats and ecosystems surrounding the Exe Estuary
 - Maintaining the scenic character and views of the coastal landscape
3. Infrastructure and Service Capacity Issues
 - Existing roads, schools, healthcare facilities, and other services already at capacity
 - Doubts about the ability to support additional development
4. Impacts on the Character and Identity of Lymptstone
 - Concerns about the scale of development overwhelming the rural character of the village
 - Potential conflicts with the adopted Lymptstone Neighbourhood Plan
5. Flooding and Drainage Concerns
 - Increased risk of flooding and runoff into the Exe Estuary due to additional development
6. Preference for Protecting Farmland and Open Spaces
 - Objections to the loss of valuable agricultural land and undeveloped areas
7. Acknowledgment of the Site's Sustainable Location
 - Recognition of the site's accessibility and proximity to public transport options

GH/ED/73

We asked the question below and received the feedback summarised.

Do you have any comments on GH/ED/73 being within the proposed CPA?

Summary:

The responses to the question about site GH/ED/73 being within the proposed Coastal Preservation Area (CPA) express similar concerns to those raised about GH/ED/72. There is strong opposition to including this site for potential development, with respondents emphasizing the importance of preserving the environmental and scenic value of the area, as well as doubts about the ability of the local infrastructure and services to accommodate additional housing.

Key points raised, in order of frequency:

1. Objections to Development within the CPA
 - Questioning the rationale for considering development in a protected coastal area
 - Calls to maintain the established CPA boundaries and restrictions
2. Concerns about Environmental and Landscape Impacts
 - Preserving the natural habitats and ecosystems surrounding the Exe Estuary
 - Maintaining the scenic character and views of the coastal landscape
3. Infrastructure and Service Capacity Issues
 - Existing roads, schools, healthcare facilities, and other services already at capacity
 - Doubts about the ability to support additional development
4. Impacts on the Character and Identity of Lympstone
 - Concerns about the scale of development overwhelming the rural character of the village
 - Potential conflicts with the adopted Lympstone Neighbourhood Plan
5. Flooding and Drainage Concerns
 - Increased risk of flooding and runoff into the Exe Estuary due to additional development
6. Preference for Protecting Farmland and Open Spaces
 - Objections to the loss of valuable agricultural land and undeveloped areas
7. Acknowledgment of the Site's Sustainable Location
 - Recognition of the site's accessibility and proximity to public transport options

Wood_28

We asked the question below and received the feedback summarised.

Do you have any comments on Wood_28 being within the proposed CPA?

Summary:

The responses to the question about site Wood_28 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development of this site. Respondents emphasize the importance of preserving the natural environment, wildlife habitats, and scenic value of the area, as well as concerns about the already strained infrastructure and services in the Exmouth and Lympstone region. There is a strong sentiment that the CPA designation should be respected and maintained, with several calls to remove the site from consideration for development.

Key points raised, in order of frequency:

1. Importance of Environmental and Landscape Protection
 - Preserving the natural habitats and ecosystems of the coastal area
 - Maintaining the scenic beauty and character of the landscape
2. Concerns about Infrastructure and Service Capacity
 - Roads already experiencing heavy congestion
 - Overstretched schools, healthcare facilities, and other local services
3. Objections to Development within the CPA
 - Questioning the rationale for considering development in a protected area
 - Calls to respect the established CPA boundaries and restrictions
4. Preference for Prioritizing Brownfield and Infill Development
 - Suggestions to focus new housing on underutilized sites within urban areas
 - Concerns about the loss of valuable farmland and open spaces
5. Concerns about Impacts on Wildlife and Biodiversity
 - Potential negative effects on the Exe Estuary's sensitive ecosystems and migratory birds
6. Acknowledgment of the Site's Sustainable Location
 - Recognition of the site's accessibility and proximity to public transport options