

Filtered Data Export

**Full name:** Michael Canham

**Organisation (where relevant):** Blackdown Hills Parish Network

**Other party name (if relevant):**

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD12

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**

Brhe\_09

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Response to Consultation by email (localplan@eastdevon.gov.uk) from: Blackdown Hills Parish Network Green Pastures Bishopswood Somerset TA203RS

Submitted on 26th January 2026 by: \*\*\* Personal details have been removed \*\*\*

REPRESENTATION: The Blackdown Hills Parish Network is an association of 49 parishes wholly or partially within, or adjacent to, the National Landscape. The Network supports the comments made by Broadhembury Parish Council in response to both the first and second invitations to comment on the draft Local Plan. In particular: 1: the site allocation process has not been positively prepared or justified. Consistent criteria have not been applied to all sites both within and adjacent to the National Landscape - since the preparation of the Plan a rejected site has been granted outline permission. 2: Proper consideration has not been given to the Broadhembury Conservation Area. 3: The District Council has not discharged its statutory duty under LURA24 to 'seek to

further the purposes of a Protected Landscape' as a 'responsible Authority'. This qualified active duty has been helpfully defined by Mr Justice Mould (New Forest National Park v Secretary of State 2025). The duty means that a local planning authority has to decide if development 'promotes' the conservation and enhancement of natural beauty and the Network has seen no evidence that the District Council has engaged in this active process. We believe you have to consider: + if there are viable alternatives (there are because you have approved an alternative rejected site), + what mitigation to the harm caused could be made (your suggestion of a hedge is clearly not adequate mitigation) + how natural beauty could be enhanced by approval (we have seen no evidence that you have engaged in an active process to do this. In fact in response to your own question 'effect on National Landscape?' you have recorded 'none'. For clarity: it is important you understand that the LURA24 statutory duty applies to Plan- making and to actions by 'relevant authorities' which affect the setting of a Protected Landscape.

\*\*\* Personal details have been removed \*\*\*

Chairman

Blackdown Hills Parish Network (sent from my personal email account because of problems this morning with my official .gov account)

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The Network would urge the District Council to withdraw from consideration all sites in Broadhembury parish, both within or adjacent to the National Landscape.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** I can confirm the Network wishes to be represented at Public Enquiry.