

Broadhembury

Review of Allocation Sites in the context of Blackdown Hills National Landscape



Final Report

December 2025

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1.0 Introduction

1.1 Appointment

- 1.1.1 In March 2025 Alison Farmer Associates (AFA) was appointed by Broadhembury Parish Council (BPC) to undertake a review of the selection of potential housing sites associated with Broadhembury given its location within, and on the margins of the Blackdown Hills National Landscape. This work was commissioned in the context of the wording set out in Levelling Up and Regeneration Act (LURA 2023), which requires all relevant authorities (including Local Authorities) to further the purposes of National Landscapes when making decisions. In particular, it considers the special qualities of the Blackdown Hills National Landscape and that of the village of Broadhembury itself.

1.2 Purpose of the Study

- 1.2.1 The purpose of the study is to:
- Articulate the special qualities of Broadhembury and the Blackdown Hills National Landscape;
 - Review the site selection process undertaken by East Devon District Council (EDDC);
 - Consider the suitability of Brhe 09 for development in principle; and
 - Determine whether the duty to further the purposes of designation has been met.
- 1.2.2 The review has been based on desk study research, a site visit on the 18 October 2025, and a detailed review of the Site Selection Report undertaken by EDDC for Broadhembury. In October 2025 Broadhembury Parish Council made a Freedom of Information request for the survey pro formas used in the site selection process. No forms were provided on the basis information was accessible via other means (Site Selection Report) and therefore exempt.

1.3 Broadhembury – Location and Context

- 1.3.1 Broadhembury village is located in Broadhembury Parish in East Devon, on the southern fringes of the Blackdown Hills National Landscape. Other settlement within the parish includes Kerswell, Luton, Colliton and Dulford. Broadhembury village is located c.5 miles northwest of Honiton and has a population of c. 700. It has a pub (The Drewe Arms), a church, primary school and a local post office and tea room.
- 1.3.2 The village is a pretty estate village of cob and thatch cottages. The village Conservation Area (designated prior to 1974) covers the majority of the village with the exception of peripheral development at Lawrence and Western Closes, properties along Wood Lane, the village hall and isolated properties on the eastern fringes of the village (refer to Figure 1).
- 1.3.3 Broadhembury is a quintessential 'broad street' village. The sense of place of the village is defined by the historic built environment and its countryside setting.

2.0 East Devon Local Plan and Site Selection Process

2.1 Local Plan Background

- 2.1.1 East Devon District Council (EDDC) is preparing a new Local Plan for the period 2020-2042. The plan is well advanced and has reached Regulation 19 stage and EDDC has recently published its consultation analysis.
- 2.1.2 The stages which have led to this have included the identification of sites for development allocation in the Local Plan. Decisions relating to this are contained in a suite of documents, the chronology of which is set out in the table below.

Table 1: Chronology of Publications

Document	Date of Publication	Commentary
Blackdown Hills Management Plan (2019-2024)	2019	Sets out the special qualities of the National Landscape, policies and guidance for development proposals.
Call for sites and Housing and Economic Land Availability Assessment (HELAA)	2021	Sites Brhe 04, 05 and 07 were considered. Refer to HELAA Appendix D(ii). Sites 01, 02 and 03 are some distance from Broadhembury and not relevant to this review.
Site Selection Methodology Version 1	Nov 2022	Stages 1-4 site assessment. Includes landscape sensitivity, heritage and ecology and a final stage when site is considered in relation to housing requirement and strategy.
Call for Sites / HELAA	Nov 2022	Site Brhe 04, 05, 07 were again considered in more detail and an additional site Brhe 09 identified (map K).
Draft Local Plan (Reg 18) Consultation	Nov 22 – Jan 2023	Plan for Broadhembury shows all 4 sites considered in the HELAA with Brhe 09 shown as the second choice and all other sites rejected. Very broad brush write-ups are provided which do not appear to reflect the methodology (2022).
Draft Local Plan (Reg 18) Consultation Feedback Report	July 2023	Historic England raised concerns that a detailed and separate Historic Environment Site Assessment (HESA) for allocated site Brhe 09 was not provided.
Levelling-up and Regeneration Act 2023	Dec 2023	New 'duty to have regard' to the purposes of designation.
Site Selection Methodology Version 2	2024	Stage 3 site assessment refines previous method statement but does not pick up on the new 'duty' as a result of LURA. It is accompanied by a detailed landscape sensitivity assessment methodology (March 2023) which provides helpful

		sensitivity ratings and definitions. Heritage assessment indicates that detailed heritage impact will only be undertaken for a preferred allocation.
EDDC Site Selection Report Broadhembury Version 1	Sept 2024	Write up and analysis justifying selection of site Brhe 09. However no write up on detailed landscape sensitivity assessment only a summary provided. No clear evidence why site Brhe 09 selected over other sites.
EDDC Site Selection Report Broadhembury	Feb 2025	More detailed summary of landscape sensitivity, heritage and ecology assessments for each site. More detailed evidence justifying site selection although judgements not in accordance with the Landscape Sensitivity Methodology.
Regulation 19 Local Plan Consultation	Feb-March 2025	Site Brhe 09 identified as an allocated site in Broadhembury and associated with Policy SD12.
Comments on Reg 19 Consultation	9 Oct 2025	Local Plan Consultation Response and Feedback Report notes objection from Broadhembury Parish Council but fails to record a significant objection
Blackdown Hills Management Plan (2025-2030) adopted by DCC, EDDC, SC and MDDC	Oct 2025	Sets out special qualities, policies and guidance for development proposals as well as specific guidance on the actions required by 'relevant authorities' to comply with the LURA (23) provisions
EDDC Heritage Strategy updated	Consultation Dec 2025	Summary of heritage in East Devon and sets out objectives for the future. It considers the value of heritage as part of sustainable development

2.2 Site Selection Process

2.2.1 The Reg 19 Local Plan states in relation to Strategic Policy SD12:Development allocation at Broadhembury (Brhe_09) that:

'The site is allocated for 10 homes. This site is particularly sensitive in heritage and landscape terms and careful detailed assessment and design work will be needed to ensure that the design respects the special character of the area. The site should be landscaped to provide boundary screening appropriate to the edge of National Landscape location. There is an absence of a defined pedestrian access to bus stops/local amenities, so opportunities to enhance this should be addressed through development. Any application to develop the site must include a study of the impact of development on the setting of the Church, which is a Grade I listed building, and the Conservation Area. Proposals must show how adverse impacts will be avoided and where appropriate impact on these heritage assets will be mitigated' (Page 95).

2.2.2 Broadhembury Parish Council formally objected to the allocation of site Brhe 09 in the emerging Local Plan (letter dated March 2025). In particular it considered the assessment which led to

the identification of the allocation, was flawed and failed to meet the duty set out in LURA 2023. The Parish cited the following specific reasons for objecting to Brhe 09 including:

- Proposal constitutes 'major development'.
- Harm to the character and appearance of the Conservation Area
- Failure of EDDC to exercise its duty to further the purpose of designation of the Blackdown Hills National Landscape in its site selection process,

2.3 Duty to Further the Purposes of Designation

2.3.1 The Levelling Up and Regeneration Act (LURA 2023) requires all relevant authorities (including Local Authorities) to further the purposes of National Landscapes when making decisions. Guidance published by Defra '*Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes*' (Dec 2024) draws upon the earlier briefing publication by the National Landscape Association (November 2024).

2.3.2 The new wording in LURA 2023 strengthens the previous working in the Countryside and Rights of Way Act 2000 (section 85). Relevant Authorities now need to 'seek to further the purposes of designation' rather than simply 'have regard to'. The difference in wording makes it clear that it is something which must be done and is no longer discretionary and that it is an active duty not passive. This means that a relevant authority should:

- take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes;
- as far as reasonably practical, seek to avoid harm and contribute to the conservation and enhancement of natural beauty, special qualities and key characteristics of Protected Landscapes;
- there should be documented evidence to demonstrate the duty has been enacted.

2.3.3 The duty applies to all aspects of the development management process as well as the plan-making process, including the identification and allocation of sites in a Local Plan. It also applies to decisions taken in association with land which forms the setting of a Protected Landscape. Defra Guidance makes clear that '*Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting, for example:*

- *a shared water catchment and management of water resources*
- *ecological connectivity where species are able to move across and between the designated and non-designated area*
- *Rights of Way, Open Access Land and other recreational links joining the designated area to the wider countryside.*

Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape.'

2.3.4 The Management Plan for a specific AONB is a statutory document. It is the principal vehicle for ensuring that the statutory purposes of the AONB are met, and is a material consideration in the planning process.

2.3.5 Conserving and enhancing the character components or special qualities identified in the Management Plan can be achieved through;

- supporting the Management Plan Objectives, Policies and/or Principles (as applicable) as set out for each of these; and
- following any Management Plan actions set out for each.

2.3.6 AONB Management Plans are often supported by additional guidance documents that provide more detailed advice and position statements relating to subjects such as design, dark skies, rural roads and public realm, renewable energy infrastructure, and the setting of the AONB, and these should also be considered in the decision-making process, as should any Landscape Character Assessments / Historic Character Assessments that inform Management Plans.

2.3.7 In particular the National Landscape Association briefing note states:

'For decisions relating to site allocations:

- *Assess what impact the proposed site allocation would have on the natural beauty of the AONB, considering its scale, location and landscape setting with reference to the character components/special qualities set out in the AONB Management Plan. (In this regard, consider including a specific criterion regarding 'natural beauty' within the Strategic Housing Land Availability Assessment (SHLAA)/Housing and Economic Land Availability Assessment (HELAA), and within the Sustainability Appraisal).*
- *Consider how the natural beauty of the AONB might be affected, were the site to be allocated for development. Remember to consider the holistic concept of natural beauty.*
- *Consider whether this would cause harm to the natural beauty of the AONB. Consider the objectives/principles/policies of the AONB Management Plan. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes.*
- *Ensure clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g., like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the AONB. Natural England have advised that measures that further the purposes are required in addition to mitigation.*
- *If the measures would have a neutral effect, consider what modifications would help further the purpose of conserving and enhancing the natural beauty.*
- *If promoting a site allocation would not align with the duty to seek to further the conservation and enhancement of natural beauty, then consider amending or deleting a site allocation such that you could confidently say the decision does seek to further the statutory purpose. (For example, choosing not to allocate a particular site within or close to the AONB boundary could demonstrate compliance, where this results in avoiding harm.)*
- *Evidence how the LPA has sought to further the purpose of conserving and enhancing the AONB in its decision, with reference to aligning with AONB Management Plan objectives/principles/policies.'*

[emphasis added]

- 2.3.8 This is highly relevant to the review and assessment of site options for a settlement within the National Landscape. It is therefore reasonable to expect some reference to the special qualities of the Blackdown Hills National Landscape and the objectives and principles in the Management Plan, when assessing and determining the most suitable site for allocation - especially for a settlement which falls within the designation, and for land which forms its immediate setting.

3.0 Special Qualities of Broadhembury and its Environs

3.1 Landscape Character

3.1.1 The East Devon and AONB Landscape Character Update (2019) classified the area of Broadhembury as 3A: Upper Farmed and Wooded Valley Slopes. The whole of the village and its immediate landscape setting fall within this character type.

3.1.2 The character assessment emphasises the importance of intervisibility between the landscape types but for the purposes of this assessment it is character type 3A: Upper Farmed and Wooded Valley Slopes which is most relevant. The landscape characteristics and qualities identified in the Landscape Character Assessment (LCA) which are particularly pertinent to this assessment/review include:

- Ancient and settled landscape, containing patchworks of irregular fields, woodland, winding lanes, scattered farms and small villages, often with square-towered churches.
- Timeless quality and strong sense of history.
- Attractive views within the landscape.
- Foreground to higher land above.
- Dark skies are characteristic at night.
- Estate landscapes associated with houses, parks and estate villages.

3.1.3 In terms of forces for change the LCA highlights:

- Linear growth of settlements along valleys.
- New housing.
- Damage to banks alongside narrow lanes.

3.1.4 Landscape aims/guidance in the LCA include:

- Impacts of any new buildings should be minimised.
- Identify and protect areas of tranquillity and dark skies.
- Retain the pattern of small-scale settlements constructed of local materials.
- Improve integration of new development into the wider landscape, specifically through characteristic landscape features such as hedges, earth banks and small woodlands.
- Where new dwellings are required, they should be carefully sited with regard to the traditional settlement form. For example, avoid linear development up the valley side above a nucleated village.

3.2 Blackdown Hills Special Qualities

3.2.1 The village of Broadhembury lies within the Blackdown Hills on its southern margins with the boundary of the National Landscape designation following its southern edge of the village (refer to Figure 1).

3.2.2 The recently published Blackdown Hills AONB Management Plan 2025-2030 summarises the special qualities of the National Landscape as follows:

'The Blackdown Hills Area of Outstanding Natural Beauty has a suite of special qualities that together make it unique and outstanding, underpinning its designation as a nationally important protected landscape. Special qualities may be considered as specific components of 'natural beauty', distilling out the key attributes that combine in particular ways to form the natural beauty of the AONB. These are the special qualities, individually and in combination, that we need to conserve and enhance for the future and they should be considered in all decisions affecting the AONB.'

3.2.3 It goes on to provide a statement of significance, stating that:

'From the dramatic, steep, wooded north-facing scarp, the area dips gently southwards as a flat-topped plateau deeply dissected by valleys. This is the northern part of the East Devon Plateau – one of the finest, most extensive in Britain. The tops are open and windswept; in the valleys villages and hamlets nestle among ancient patterns of small, enclosed fields and a maze of winding lanes lined with high hedgebanks. The steep valleys support a patchwork of woodland and heath, nationally and regionally important habitats which support a wealth of charismatic and priority species and interesting plant communities.....

Key to the Blackdown Hills designation as an AONB is the subtle combination of four aspects of the landscape (The Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989):

It is an isolated and unspoilt rural area and remains relatively undisturbed by modern development and so ancient landscape features, special habitats, historical and archaeological remains have survived intact. There is a sense of stepping back in time in the winding lanes, the hidden valleys and relatively remote villages. The traditional pattern of villages, hamlets, paths and roads remains largely unchanged and there is an identifiable and characteristic vernacular, pastoral landscape.

There is a diversity of landscape patterns and pictures. The visual quality of the landscape is high and is derived from the complex patterns and mosaics of landscapes. Although the scenery is immensely varied, particular features are repeated. Ancient, species-rich hedgerows delineate the fields and define the character of the landscape, enclosing narrow twisting lanes. There are long views over field-patterned landscapes. The high plateau is dissected by steep valleys, supporting a patchwork of woodland and heath, and there are fine avenues of beech along the ridge. The history of medieval and parliamentary enclosures has resulted in an individual, patchwork landscape of small fields in the valleys and larger fields with straight hedges on the plateau.

There is a unique geology. The composition of the underlying geology of the Blackdown Hills and the adjoining East Devon AONB is unique in Britain and is one of the area's strongest unifying features. It has given rise to the distinct topography of a flat-topped plateau, sharp ridges and spring-lined valleys. The springs have created the characteristic pattern of rough grassland, mire and woodland vegetation on the valley sides. The nature of the Greensand rock has meant that plant communities are particularly diverse. Moreover, the geology has provided a local building material, chert, which is uncommon elsewhere.

It is a landscape with architectural appeal. The landscape pattern is punctuated by a wealth of small villages, hamlets and isolated farmsteads of architectural value and distinctive character. Devon and Somerset are recognised nationally for their fine rural architecture, but the Blackdown Hills contain a special concentration of buildings where the vernacular character is particularly well preserved. Predominant materials are chert and cob with thatch, often now

replaced by corrugated iron, or clay-tiled roofs. The appeal lies in the way in which the buildings fit so naturally into their surroundings.'

- 3.2.4 **Policy PL16** of the Management Plan states *'All development affecting the Blackdown Hills National Landscape should conserve and enhance natural beauty and special qualities by:*
- *Respecting landscape character, settlement patterns and local character of the built environment.*
 - *Being sensitively sited and of appropriate scale.*
 - *Reinforcing local distinctiveness.*
 - *Seeking to protect and enhance natural features and biodiversity.'*
- 3.2.5 The management plan also makes specific reference to setting stating *'The setting of a National Landscape is the surroundings in which the influence of the area is experienced. Put another way, it is the area within which development and land management proposals (by virtue of their nature, size, scale, siting, materials or design) may have an impact, be it positive or negative, on the natural beauty and special qualities of the protected landscape. If the quality of the setting declines, then the appreciation and enjoyment of the National Landscape diminishes. Large scale development, the construction of high or expansive structures, or a change generating movement, noise, intrusion from artificial lighting, or other disturbance will adversely affect the setting. Views are one element of setting, associated with the visual experience and aesthetic appreciation. Views are particularly important to the Blackdown Hills. This is because of the juxtaposition of high and low ground and the fact that recreational users value them. Without husbandry and management, views within, across, from and to the National Landscape may be lost or degraded.'*
- 3.2.6 In relation to planning and development the Management Plan states *'Villages, hamlets, farmsteads, individual buildings and their settings form a vital element of the character of the Blackdown Hills. The planning and design of any development, large and small, both within the National Landscape and around it, is of key importance in maintaining the landscape and scenic beauty of the area.'*
- 3.2.7 In relation to considering natural beauty in planning proposals it states: *'The Management Plan and supporting documents should help planning authorities, developers and land/homeowners understand the landscape's capacity for change and assess impact. Mitigation is a response to harm, a way of ameliorating but not eliminating impact, and should not be a justification for allowing inappropriate development. A clear understanding of the National Landscape's special qualities and distinctive characteristics will help to develop proposals which avoid or minimise harm.'* It goes on to state *'Location and context are important considerations and development should:*
- *Respect the importance of the setting of the National Landscape,*
 - *Respect the importance of the setting of individual settlements, hamlets and historic farmsteads,*
 - *Maintain the existing pattern of fields and lanes,*
 - *Maintain the integrity of the hedgerows and irreplaceable habitats, including ancient woodland, and ancient and veteran trees, as well as open agricultural vistas, and*
 - *Enhance the sense of place.'*

3.3 Broadhembury Village

- 3.3.1 The special qualities of the National Landscape can be manifest at the local level in particular ways. This is considered further through reference to other publications relating to landscape and to Broadhembury itself.
- 3.3.2 The village of Broadhembury is nestled in the rolling countryside of Devon. It is located on the headwaters of River Tale and embraced by a horseshoe of steep scarp hills to the north and east including North Hill to the north and Hembury Hill to the southeast. The combination of the river valley and the steeply rising scarp hills creates a sheltered context for the village.
- 3.3.3 Although the village is located below the scarp it is nestled in the landscape such that few buildings are visible from the surrounding area, save for the village church tower which is a local landmark and key feature, marking the approach to the village along the historic lanes.
- 3.3.4 Broadhembury has been studied and written about in many different publications. Those that are considered most relevant to this review include:
- East Devon and AONB Landscape Character Update (2019)
 - Blackdown Hills Management Plan (2025-2030)
 - The Blackdown Hills landscape: A landscape assessment. Countryside Commission, (1989)
 - Broadhembury Conservation Appraisal (1999)
- 3.3.5 Each of these assessments records qualities and characteristics relevant to Broadhembury and its landscape setting. They help to paint a picture of what is valued locally and how the special qualities of the Blackdown Hills National Landscape are expressed in this particular location. The following headings have been identified to capture these qualities and are explored in turn below:
- Historical interest and integrity
 - Intactness of settlement form
 - Harmonious relationship with surrounding rural landscape
 - Unity of vernacular style
 - Primacy of church landmark

Historical interest and integrity

- 3.3.6 Evidence which supports the historic interest and integrity of Broadhembury and its landscape setting can be found in the **Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989**. This report specifically mentions that *'The valley settlement pattern, together with its fields and hedgerows, is largely a legacy of the medieval period.'* It goes on to state *'The AONB has a distinctive local style of architecture. Local materials such as chert, cob, thatch and clay tiles are used extensively, as well as limestone and Beer stone. The large number of surviving late medieval houses is exceptional. Many are Grade II* Listed Buildings and contain particularly fine woodwork screens, ceilings and jetties; there are fine examples in Broadhembury.'*
- 3.3.7 Most of the cream-washed cob cottages in the centre of Broadhembury village have been dated to the seventeenth century. Some, like Theydon Cottages and the public house are thought to be medieval in origin and Churchgate has been identified as one of the oldest properties, noted as probably being a 15th century church house, and the parish church, consecrated in 1259

dates mostly from the second half of the 15th century. These buildings demonstrate the time depth and continuity of the settlement.

Intactness of Settlement Form

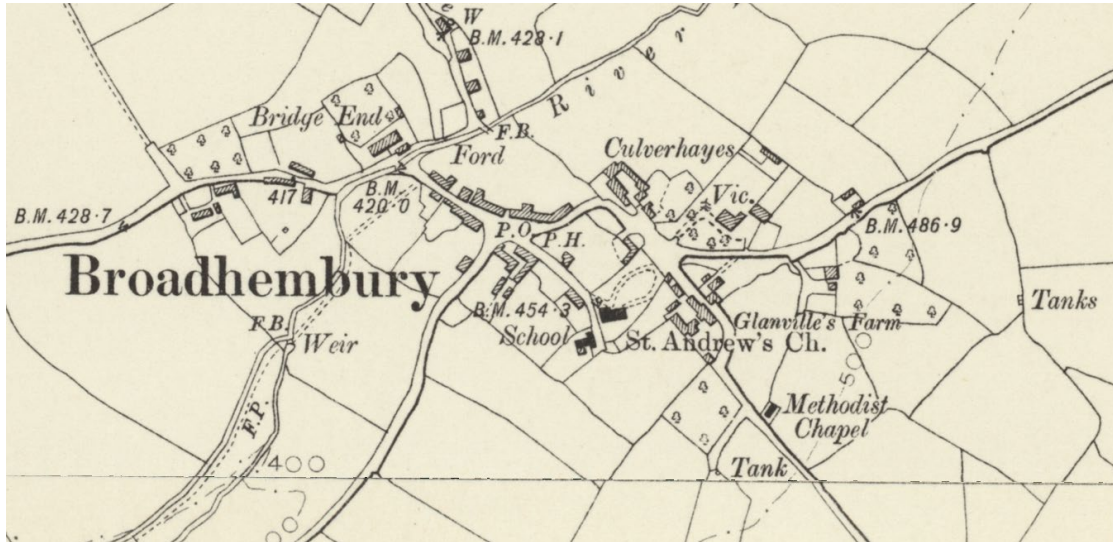
- 3.3.8 **The Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989** specifically mentions the historical layout of settlements has not been unduly influenced by modern development. It also notes that *'Broadhembury.... is believed to be the most complete sixteenth century village in Devon.'*
- 3.3.9 **The Conservation Appraisal (1999)** states that *'There is little doubt that it [Broadhembury] has few equals within East Devon, indeed, within the county as a whole.'* It goes on to state *'Broadhembury is possibly one of the most perfectly complete villages in Devon in terms of the use of traditional materials.'* Elsewhere it notes the *'particularly cohesive quality in terms of the scale of the buildings, and use of building materials; especially thatch with swept eaves, and plastered cob on rubble stone footings with traditional tar band'* as well as *'an unusual spaciousness, yet the varying alignment of the streets also ensures well enclosed vistas from many different points within the village'*.
- 3.3.10 **The Conservation Appraisal** also notes that the centre of the village is *'exceptionally spacious even though the cottages front almost directly into the carriageway with narrow plant beds between.* It goes on to state that *'the layout of the village is completely informal but with a compact grouping at the village centre where a narrowing of the carriageway at either end of the main street and curving alignment of frontages provides a strong sense of enclosure and an intricate and varying sequence of viewpoints. Elsewhere buildings are interspersed with gardens and paddocks in a much more scattered pattern of development woven into landscape features'* (page 4).
- 3.3.11 **The Broadhembury Village Design Statement** highlights the shape of the settlement noting that *'the prominence and visual importance of the farmed and wooded slopes, the green spaces within the village and the predominately linear nature of the layout of the properties provides the essential character of the settlement'* (page 13).

Harmonious Relationship with Surrounding Rural Landscape

- 3.3.12 **The Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989** notes that *'in the valleys nestle villages and hamlets, surrounded by an intricate pattern of small-scale fields, and linked by a maze of high-hedged lanes'* (page 7). It goes on *'In the south and west cob and thatch more typical of south Devon is found, for instance at Broadhembury...'* (page 22). It notes on page 30 that in places *'there has been consolidation of agricultural holdings and field amalgamation with resultant loss of hedgerows and hedgerow trees'* (page 30).

The **Historic Landscape Character Assessment** identified the fields around Broadhembury village as largely post-medieval or modern enclosed farmland, but with some medieval enclosures to the northwest, between Broadhembury and Kerswell. The historic map extract below illustrates the hedgerow pattern in the early 1900s and highlights some loss of enclosure to the south and east of the village. It also highlights the intactness of the small-scale pastures around the village. These adjoining pasture enclosures and orchards form an important part of the village's immediate setting, while the wooded scarp slope of the Blackdown Hills, forms a horseshoe-shaped bowl around the northwest, north, east and southeast of the village and

provides a green backdrop to views along the streets, making an important contribution to the wider aesthetic setting of the village. The River Tale is a further defining element of the village setting. This watercourse passes through the village, influencing its form and providing a lower lying setting to the west and southwest. This is commented on in the Conservation Area Appraisal which states that *'the small bridge and adjoining ford over a stream, providing a strong visual feature at the western end of the village'* and is the image used on the front cover of the East Devon District Council Heritage Strategy 2024-2042.



Historic map of Broadhembury from 1906 showing the pattern of enclosures and illustrating some field boundary loss but also the retention of small enclosures within the fabric of the village.

3.3.13 The **Conservation Area Appraisal** notes at para 4.1 that *'Broadhembury has a particularly rich landscape setting both within and beyond the village'*.

3.3.14 The **1997 Survey of Condition by Caroe and Partners** summarises the outstanding character of the village, creating a sense of spaciousness and loose structure:

'The importance of the village of Broadhembury lies not only in the quality of the individual buildings but also in the unspoiled nature of their setting. The essential factors in this is that the village has remained an estate village, occupied by tenancies....; less affected by dictates of fashion....' It goes on to note the absence of radical recent modernisations of the cottages, and in the retention of transitional features but also in the relationship of each cottage with its neighbours, the street and the land around. This survey makes three important observations:

- at its outskirts, buildings sit back from the road;
- nowhere is there more than a single depth of building;
- each dwelling has a direct relationship with the fields behind it.

Unity of Vernacular Style

3.3.15 Broadhembury is well known for the unified appearance of the cottages, with their cream-washed cob walls, dark coloured window frames and thatched roofs which give rise to the fundamental and defining characteristics of the village.

3.3.16 The **Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989** notes that *'The traditional appearance of most of the settlements has not been unduly affected by modern development: they retain quiet rural charm, their historical layout and their*

harmonious relationship with the surrounding rural landscape’ (page 22). It goes on to note that the love of the rustic and vernacular attracted many artists who painted rural scenes of village and cottages noting that *‘Membury and Broadhembury are two villages in the area that were regularly depicted in paintings and drawings’* (page 27).

- 3.3.17 An example is the painting below by Edward Wesson who captured the primacy of the church in the village, its edge of settlement location and the rising hills which form the backdrop to the village. This painting is taken from the southwest of the church. Although the exact location is not known, it reflects a valued view of the tower which is afforded from the southern approach road across the site Brhe_09.



Edward Wesson – view of church at Broadhembury across Brhe 09.

- 3.3.18 The **Conservation Area Appraisal** notes that its distinctive vernacular stating that *‘the overall effect is unusually complete and timeless’* (page 4).
- 3.3.19 The **Broadhembury Village Design Statement** notes *‘Most of the houses in the centre of the village are still tenanted and in the ownership of the Drewe Estate, a major contributing factors in the preservation of the homogenous character of the village’* (page 7).

Primacy of Church Landmark

- 3.3.20 The **Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989** notes that although peaceful villages nestle in the valleys it is *‘their church spires [which] are prominent features in the tranquil pastoral setting.’* (page 15).
- 3.3.21 The **Conservation Area Appraisal** notes at para 8.2 that *‘St Andrew’s Church stands on an eminence overlooking the village and is late 14th to 15th century with a fine west tower, almost 100 feet in height.’*
- 3.3.22 The **Broadhembury Village Design Statement** (2010) notes that *‘the whole [village is] commanded by the Church.’*

3.4 Conclusions

- 3.4.1 The existing assessments relating to Broadhembury and its landscape context highlight that the settlement is small in scale and deeply historic, where buildings are clustered yet where there is a sense of spaciousness and an unstructured organic form and character. Buildings sit low in the landscape save for the church tower which dominates the village. It remains visible from the wider landscape as a local landmark, building anticipation when approaching the village along rural lanes or public rights of way. These qualities and characteristics are annotated on Figures 2 and 3.
- 3.4.2 In particular the above analysis enables the following conclusions to be reached:
- Broadhembury is held in special regard within the Blackdown Hills National Landscape as one of its settlement jewels.
 - The qualities of the village are reflected in the Conservation Area Appraisal and include the unity of local vernacular materials and styles, the organic arrangement of buildings and spaciousness.
 - The church tower is the key built feature visible from the surrounding landscape, the soft vegetated and indented edge of the village largely screens views to dwellings.
 - The special qualities of the village are reliant on the historic approaches along winding rural lanes with hedgebanks and no footpaths/lighting, key views to the church tower mark the approach and the narrowing of the lane with the start of built form marks the threshold/gateway to the village.
- 3.4.3 Inserting new development into such a context can give rise to potential conflict with established qualities, including the pattern, form and character of the settlement and its position in the landscape. This is considered in more detail in section 4 below.

4.0 Guidance on Appropriate Change

4.1 Past Change

4.1.1 The Conservation Area Appraisal commented on very few changes in the village since the first appraisal in 1999. It did note the more recent housing development which has occurred in the western part of the village and concluded that this did not meet the criteria for inclusion within the Conservation Area.

4.1.2 The Broadhembury Village Design Statement (2010) notes *'steady infill development has occurred in the last century in the village'* (page 8). It goes on to highlight the type of change to avoid stating:

- *'large cluster single design development should be avoided'*
- *New development should be of small scale...*
- *Generic off the peg designs should be resisted....*
- *Protection, enhancement and creation of traditional landscape features including lanes, walls and boundaries, including Devon banks, to form an integral part of any future development proposals'* (page 8).

4.1.3 It concludes that any new development should be *'of a scale and design that complements, not dominates, its surroundings'* (page 13).

4.1.4 The Blackdown Hills landscape: A landscape assessment. Countryside Commission, 1989 highlighted a number of areas where the landscape and settlement are vulnerable to changes. In the context of Broadhembury, the following are relevant:

- *'The removal of hedgerows, especially where it affects the ancient field patterns of the combes and valleys;*
- *Any large-scale housing and other built development;*
- *Road widening and/or realignment schemes.'*

4.1.5 It went on to highlight that *'among the issues that will need to be addressed are:*

- *How to accommodate new development into the villages and hamlets without damaging their traditional architectural character....'* (page 34).

4.2 Guidance for Accommodating Change

4.2.1 The landscape character assessment for East Devon, the Broadhembury Village Design Statement, as well as the Blackdown Hills Management Plan (2025-2030), all set out guidance and advice on how to consider natural beauty in planning proposals and how best to integrate new development.

4.2.2 Broadhembury Village Design Statement provided guidance on the nature of any new development in the village stating that where is deemed necessary it *'should follow the linear layout within the village boundary, avoiding larger blocks of buildings set within a plot or striking off into the surrounding countryside. Any such infill development should maintain adequate breaks between properties to maintain the essential 'glimpses; of the farmland beyond'* (page 13).

4.2.3 The Blackdown Hills National Landscape Management Plan states that:

'The layout, form and density of all new developments needs to reflect the historic rural grain of the National Landscape. It is important that all new development, especially housing development, is of a scale and layout that conserves and enhances the distinctive pattern of built form found across the Blackdown Hills, specifically a low density, dispersed pattern of development. Location and context are important considerations and development should:

- *Respect the importance of the setting of the National Landscape,*
- *Respect the importance of the setting of individual settlements, hamlets and historic farmsteads,*
- *Maintain the existing pattern of fields and lanes,*
- *Maintain the integrity of the hedgerows and irreplaceable habitats, including ancient woodland, and ancient and veteran trees, as well as open agricultural vistas, and*
- *Enhance the sense of place.*

Development proposals in or affecting the Blackdown Hills should avoid sensitive locations that will impact on the special qualities of the National Landscape – notably views – including prominent locations on the northern scarp slope, on skylines and hilltops, the open plateaux and ridgelines, and undeveloped valley slopes. Attention should be given to noise and activity arising from developments together with lighting to avoid having an adverse impact on the area's tranquillity and dark skies. This may apply to development some distance from the National Landscape as well as within.

The sense of place is easily lost; suburbanisation and the cumulative effect of 'permitted development' break down local distinctiveness; replacing small-scale, locally distinct features with ones of a standard design erodes local character – for example the choice and style of gate, fence, wall or hedge around a house, or pavements, kerbs and driveways in new development.'

4.2.4 It goes on in Appendix 2 Part A to set out general principles for development proposals¹. These include:

'All applicants of development proposals in the Blackdown Hills National Landscape should consider the following and where possible demonstrate, through the planning application process how the development has responded positively to the Area of Outstanding Natural Beauty designation:

- **Focus on special qualities** – *explain how the development will impact on the special qualities of the Blackdown Hills National Landscape and what actions you are taking both to conserve and to enhance the landscape, scenic beauty, and other factors of natural beauty;*
- **Aim for enhancement** – *positively set out to 'enhance' the natural beauty of the National Landscape with your development proposal – be proud of your contribution to this special place;*
- **Think about location** – *avoid development that creates incongruous features in prominent and highly visible locations that detract from the long views and open character of the Greensand plateau and views from or to the ridge lines, undeveloped*

¹ These principles were also part of the earlier published Blackdown Hills Management Plan (2019-2025)

valley sides and scarps of the National Landscape. Fit development into the landscape, not on top of it;

- **Consider scale and massing** – *again this will help reduce harmful impact on the prevailing character of the National Landscape;*
- **Reflect vernacular** – *consider how the development relates to the vernacular style of local building materials and styles;*
- **Protect biodiversity** – *explain how the development impacts on the biodiversity assets of the National Landscape and how you will avoid, mitigate, or as a last resort compensate for any residual impacts;*
- **Preserve dark skies** – *consider the need for and impact of artificial lighting. Dark skies are recognised as important elements of tranquillity and contribute to the sense of wildness and remoteness as well as being culturally important;*
- **Safeguard geology, soil, air and water** – *explain how the development impacts on these natural capital assets of the National Landscape and how you will avoid, mitigate, or as a last resort compensate for any residual impacts;*
- **Assess cumulative effects** – *identify, describe and evaluate whether there are cumulative effects on the different natural beauty criteria which although alone may appear to be insignificant when considered together have a greater impact on the National Landscape. Identify and describe whether there are cumulative impacts from your development in combination with development already in place, or that which is reasonably foreseeable (such as allocated sites and sites with planning permission)'.*

- 4.2.5 The general design principles set out in the Blackdown Hills Design Guide reiterate these objectives. For example it states on page 12 that '*Locations for new buildings and development should follow the traditional settlement pattern and respect the integrity of historical settlement forms*' and '*Sensitive design of the spaces around buildings is essential to preserve local character. The most harmoniously designed building can look 'out of place' if it is not properly integrated into its setting.*'

4.3 Conclusions

- 4.3.1 The qualities identified in section 3 above are susceptible to development on the periphery or within the village and development which is not of an appropriate density or scale.
- 4.3.2 Past studies of the Blackdown Landscape and more specifically of Broadhembury highlight that new development runs the risk of extending built form into the wider countryside, altering the sequence of views and qualities on approaching the village and altering the perceptions of the village having an organic form and comprising predominately historic buildings which express a strong degree on visual unity. Development which has a higher density or semi-urban arrangement of dwellings is also likely to disrupt the settlement form and unique arrangement of higher density cottages in the centre of the village, with individual dwellings set in generous grounds elsewhere contributing to the village's organic character and sense of spaciousness.

5.0 Judgements which led to Identification of Brhe 09

5.1 Approach

- 5.1.1 The Site Selection Report for Broadhembury (February 2025) provides the evidence base and justification for the identification of site Brhe 09 in the Reg 19 Local Plan. This assessment was carried out in accordance with the detailed Landscape Sensitivity Assessment Methodology (March 2023).
- 5.1.2 The Landscape Sensitivity Assessment methodology (March 2023) sets out the approach adopted to reviewing potential sites. It states that the assessment was informed by the East Devon and Blackdown Hills Landscape Character Assessment (2019) and by the National Landscape Management Plan (page 1). It states on page 2 that *'the baseline assessment enables judgements to be formed regarding landscape value, and the likely effect of the proposed development from which judgements of susceptibility and sensitivity can be made'*.
- 5.1.3 It goes on in para 4.3 to list key attributes of development likely to affect identified key landscape characterises and values. These are summarised in the table below against each of the sites considered in Broadhembury.

Key Attribute	Brhe 04	Brhe 05	Brhe 07	Brhe 09
Introduction of built form and associated infrastructure	✓	✓	✓	✓
Impact on topography – steep slopes likely to require significant earthworks/ retaining structures				
Impact of light spill from street lighting or windows on areas noted for dark skies	✓	✓	✓	✓
Impact on tranquillity through increased levels of site activity and increased traffic movement on surrounding roads	✓	✓	✓	✓
Site access requirements- consider if existing arrangements are satisfactory or can be improved by minor modification or if major alteration/ new access provision required	✓	✓	✓	✓
Typical access works- grading to accommodate level differences, visibility splays, highway infrastructure, tree/ hedgerow loss	✓	✓	✓	✓
Loss of trees/ hedgerow/ other noteworthy habitats	✓	✓	✓	✓
Impact on watercourses/ waterbodies				
Impact on boundaries –tree and hedgerow root protection areas		✓	✓	✓
Impact on other notable site features				

Key Attribute	Brhe 04	Brhe 05	Brhe 07	Brhe 09
Impact on designated assets within and in vicinity of site	✓	✓	✓	
Offsite access to services – eg need for extended footways/ cycleways/ bus stops	✓	✓	✓	✓
Construction phase impacts including potential off site impacts eg large delivery vehicles/ construction plant accessing narrow winding lanes.	✓	✓	✓	✓

5.1.4 The comparison of sites indicates that the key attributes of development are likely to affect landscape characteristics and values on all of the sites. The only differences are that development on site Brhe 04 is not expected to impact trees and hedgerow, which is questionable, and that Brhe 09 would not impact designated assets within and in the vicinity of the site (despite intervisibility with the church). It is curious that sites 04, 05 and 07 may impact a County Wildlife Site - it is not clear which site this is or where it is located. It is also curious that proposed development is not expected to affect topography on each of the sites, particularly given that Brhe 09 sits above the lane which would provide access, and site Brhe 07 shows greatest topographic variation.

5.2 Susceptibility

5.2.1 The Landscape Sensitivity Assessment methodology considered the following susceptibility criteria:

1. Physical and natural character
2. Cultural and historic associations
3. Relationship to existing settlement edge
4. Experiential landscape character (Perceptual qualities)
5. Visual sensitivities and inter-visibility (Views).

5.2.2 Table 1 set out the susceptibility assessment criteria and Table 2 the susceptibility ratings. The criteria considered follow best practice and are helpful. The sensitivity ratings are also helpful in providing transparency.

5.2.3 In reviewing the judgements reached in the Site Selection Report for site Brhe 09, no reference is made under cultural and historic associations to views of the landmark church and the role of the site in providing a rural foreground, nor the cultural association with the artist Edward Wesson as noted in section 3 above. Taking this into account, the susceptibility rating for Cultural and historical associations is considered to be **high**.

5.2.4 Under the 'Relationship to the Settlement Edge' no reference is made to the current settlement form, the importance of small enclosures on the edge of the settlement, or the position of the church at the settlement edge. Reference is made to development creating a '*strong settlement edge*' but there is no reference to the fact that the settlement edge is already very strong. It is considered that development of Brhe 09 would have a poor relationship with the existing settlement pattern and would adversely affect the existing settlement edge. Development would adversely impact views to key features in the settlement eg church tower. On this basis it is considered the susceptibility rating for 'relationship to the existing settlement edge' should be **high**.

- 5.2.5 Under the 'Experiential qualities' reference is made to background noise from the hall, school and adjoining road. These influences are very minor and transient and are not regarded as sufficient to reduce the rating to medium. Rather the site is considered to be part of a landscape which has high scenic quality and a rural character and a high degree of tranquillity with few modern influences and dark night skies – i.e. a **high** rating.
- 5.2.6 Under the 'Views' Brhe 09 is noted as being visible above the roadside and siting above the road. It refers to impact on the setting of the church and potential visibility in long range views. On this basis it is considered the susceptibility rating for 'views' should be **high** i.e. the landscape is open and has a high degree of visibility from surrounding landscapes and the settlement. It forms a visually distinctive and important undeveloped foreground when approaching the village from the south.
- 5.2.7 Based on the above analysis the susceptibility rating for site Brhe 09 is considered to be high. It is notable that this concurs with the judgment which is reached in the Site Section Report (page 46). This means that the key characteristics and qualities of the landscape are highly susceptible to change from the development proposed, or put another way, the landscape has little or no ability to accommodate the type of development proposed without fundamental alternation of its key characteristics and those of the village of Broadhembury.
- 5.2.8 Importantly, the Site Selection Report considered Brhe 09 to be the most susceptible of all four sites, to the type of development being proposed.

5.3 Value

- 5.3.1 The Landscape Sensitivity Assessment methodology makes reference to the published Landscape Institute Guidance on assessing valued landscape outside of National Designations. However no such assessment is included in the Site Selection Report.
- 5.3.2 The assessment awards a value of very high for land within the National Landscape (sites Brhe 04, 05 and 07) and high for site Brhe 09. The only justification for this difference appears to be the fact that Site Brhe 09 lies outside of the National Landscape boundary. Page 4 of the Site Selection Report makes reference to this when discussing site Brhe 04 – it concludes that Site Brhe 09 is preferable simply because it lies outside of the National Landscape designation.
- 5.3.3 The approach and method adopted raises issues regarding the 'value' rating given to landscapes which lie beyond the boundary of a National Landscape but immediately adjacent. It is well know that the natural beauty of a landscape rarely changes abruptly and that boundaries to National Landscapes are frequently drawn within areas of transition. Therefore awarding a value rating simply based on whether a site falls within or outside the National Designation does not reflect more subtle changes on the ground. Given the qualities of the landscape comprising Brhe 09: its unspoilt rural qualities forming the lower slopes of the wooded ridges; its proximity to the Blackdown Hills National Landscape boundary forming its immediate setting; and its role as part of the setting to Broadhembury village and landmark church; the value of Brhe 09 could reasonably be regarded as the same as other sites within the village i.e. Very High.

5.4 Sensitivity

5.4.1 The Landscape Sensitivity Assessment methodology helpfully provides Table 5 Landscape Sensitivity Matrix (page 10). This provides transparency regarding value and susceptibility of different sites resulting in an overall landscape sensitivity rating. The fourth column of the table below summarises the ratings given to each of the sites in Broadhembury as set out in the Site Selection Report and the final column provides a sensitivity rating with reference to Table 5 of the methodology.

Table xx:

Site	Value	Susceptibility	Sensitivity in Site Assessment Report	Actual Sensitivity in accordance with Landscape Sensitivity Matrix Table 5
04	Very high	Medium	Medium-high	High-medium
05	Very high	High-medium	Very High	High
07	Very high	High-medium	High	High
09	High	High	Medium	High

5.4.2 This analysis demonstrates that the sensitivity rating for Brhe 05 is not in accordance with the Landscape Sensitivity Matrix. A very high value site and high-medium susceptibility would give rise to a high sensitivity as is the case for Brhe 07. No explanation for the very high sensitivity rating is given.

5.4.3 Significantly, the sensitivity rating for Brhe 09 has been underestimated and according to the Landscape Sensitivity Matrix it should be high, given it is high value and has high susceptibility.

5.4.4 The recalibration of sensitivity in accordance with the Landscape Sensitivity Matrix indicates that:

- All sites within Broadhembury are sensitive.
- Brhe 04 is the least sensitive²
- Brhe 09 has a high sensitivity and is the most susceptible to proposed development.

5.5 Heritage and Ecology

5.5.1 Other issues become apparent when considering heritage and ecology. For example, the reasons given for not allocating Brhe 05 include heritage impacts which cannot be satisfactorily overcome (page 15). However, under the conclusion of the Historic Environment Site Assessment (page 18) it states '*no significant effects which cannot be mitigated. An impact is predicted, but would not compromise the asset(s) cultural heritage value to the extent that the attributes led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable. The overall significance of the asset would not therefore be materially changed*'. This demonstrates an inconsistency in judgements.

5.5.2 Another example is evident when comparing the text for Brhe 05 and Brhe 09 in relation to the contribution of the sites to the significance of St Andrews Church. The analysis for Brhe 05 is

² This site has been approved for outline planning as part of a wider development site (application 23/2538/OUT).

set out on page 34 and the site is regarded as significantly contributing to the setting of the church. For Brhe 09 the assessment of the significance of the asset and relationship of the site to the heritage asset lacks detail. Similar text to that for Brhe 05 can be found under Further Assessment required?. Reference is made to 'see notes' but no notes are provided. The assessment goes on to correctly identify that *'the purpose of the Church was to be seen as a dominant feature from the approaches to the village and visibility from surrounding houses'* but nevertheless concludes that *'Given the topography, intervisibility with new housing is not considered to detract from the setting of the Church provided a suitable design can be achieved'* It is not clear why this conclusion would not also apply to Brhe 05 and why suitable design makes it acceptable at Brhe 09 and not Brhe 05. This demonstrates a clear lack of transparency between analysis and judgements and also an inconsistency in judgements between each of the individual sites.

- 5.5.3 In conclusion the EDDC assessment of sites at Broadhembury appears flawed and the application of the Landscape Sensitivity Assessment approach would indicate that Brhe 04 is the least sensitive from a landscape perspective.

5.6 Extent to which Local Plan Process follows Guidance for Integration of New Development

- 5.6.1 The Reg 19 Local Plan states in relation to Strategic Policy SD12:Development allocation at Broadhembury (Brhe_09) that:

'The site is allocated for 10 homes. This site is particularly sensitive in heritage and landscape terms and careful detailed assessment and design work will be needed to ensure that the design respects the special character of the area. The site should be landscaped to provide boundary screening appropriate to the edge of National Landscape location. There is an absence of a defined pedestrian access to bus stops/local amenities, so opportunities to enhance this should be addressed through development. Any application to develop the site must include a study of the impact of development on the setting of the Church, which is a Grade I listed building, and the Conservation Area. Proposals must show how adverse impacts will be avoided and where appropriate impact on these heritage assets will be mitigated' (Page 95).

[emphasis added]

- 5.6.2 Guidance set out in section 4 and specifically the Blackdown Hills Management Plan, highlights the importance of conserving and enhancing the special qualities of Broadhembury and notes particular concern regarding development on the margins of the settlement.
- 5.6.3 Taking each of the requirements in Strategic Policy SD12 in turn:

- A landscape boundary to provide screening appropriate to the edge of a National Landscape whilst important, misses the important consideration of the setting of Broadhembury village. The qualities of the village - its form and sense of spaciousness, the primacy of the church and lack of visibility of dwellings – would in reality make effective mitigation difficult to achieve. It would need to maintain the characteristic indented and vegetated village edge, retain small scale enclosure patterns and sense of spaciousness, preserve key views to the church and protect rural lanes and approaches to settlements. Given the scale of development proposed (up to 10 dwellings) this is highly unlikely to be achieved.

- Provision of pedestrian access to local amenities is also problematic given the need to retain the rural character of lanes which have no footpaths and are unlit.
- The impact on the setting of the church is also likely to be significant. At the very least the effects of development on this important building and on the conservation area should be determined prior to the site being allocated in the Local Plan.

5.6.4 This raises considerable doubt that development of the scale proposed could reasonably be accommodated on site Brhe 09 without giving rise to adverse landscape and heritage effects which are not possible to satisfactorily mitigate.

5.6.5 This matters because of the very special qualities of Broadhembury and because of the special value placed on it in the context of the National Landscape as a whole.

5.7 Extent to which Local Plan Process considers Duty to have Regard

5.7.1 There is no mention of the duty to have regard to the special qualities of a Protected Landscape in the Site Selection Methodology (2024) despite it postdating enactment of the Levelling up and Regeneration Act.(23)

5.7.2 There is no specific consideration of the special qualities of the National Landscape in the assessment of sites at Broadhembury or of the special qualities of Broadhembury and its local environment.

5.7.3 A number of important observations are recorded in the Site Selection Report analysis such as:

- ‘green gaps’ between buildings are a notable feature;
- No pavements or street lighting in the village;
- The church tower physically dominates;
- Setting is quiet and pastoral;
- Narrow quiet country lanes;

Nevertheless, this understanding does not follow through into the judgements reached in terms of the acceptability of development on individual sites within the village.

5.7.4 There is no clear consideration of how development might further the purpose of designation and to what extent proposed measures simply mitigate harm.

5.7.5 There is no evidence regarding how development of site Brhe 09 would align with the AONB management plan objectives/principles and policies.

5.7.6 Overall, this raises doubt as to whether developing site Brhe 09 could seek to further the statutory purpose and leads to the question - should it be allocated at all?

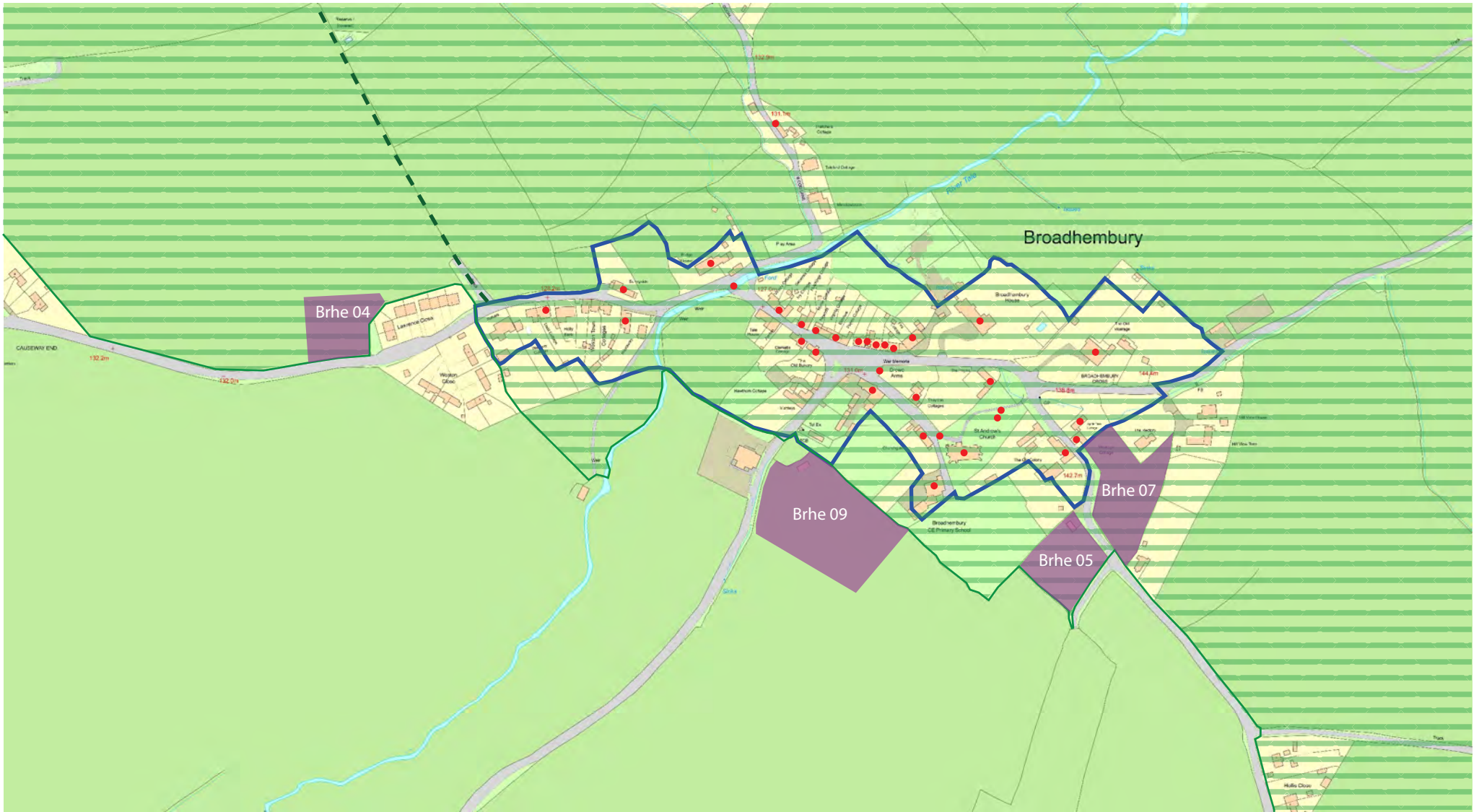
6.0 Conclusions

6.1 Should site 09 be an allocation in the East Devon Local Plan?






- 6.1.1 This review has highlighted the exceptional qualities of Broadhembury and its distinctive contribution to the Blackdown Hills National Landscape, despite its peripheral location. The village's character, form, and setting are integral to the area's special qualities and sense of place.
- 6.1.2 The review has also identified inconsistencies in the assessment of sites around Broadhembury during the East Devon Local Plan site-selection process, and the apparent bias that has led to the identification of site Brhe 09 as the preferred allocation.
- 6.1.3 The detailed analysis demonstrates that development of Brhe 09 would likely cause significant adverse effects on the special qualities of both the village and the National Landscape. This sensitivity is acknowledged in the Regulation 19 Local Plan Policy SD12 wording, which itself notes that *"this site is particularly sensitive in heritage and landscape terms..."*.
- 6.1.4 The evidence indicates that all of the sites assessed in Broadhembury are highly constrained and sensitive to development of the scale proposed. The approach of identifying a single housing allocation is therefore questionable, and unlikely to represent a justified or effective strategy for such a sensitive settlement.
- 6.1.5 The Local Plan's proposed mitigation measures for Brhe 09, including landscape screening and careful design, are conceptually appropriate but in practice problematic. Effective mitigation would need to maintain the characteristic indented and vegetated village edge, retain small-scale enclosure patterns and spaciousness, and preserve key views such as the primacy of the church tower and approaches to the village as well as protecting dark skies — objectives that are unlikely to be achieved.
- 6.1.6 Similarly, the Local Plan's reference to providing new pedestrian links conflicts with the established character of Broadhembury's rural lanes, which, as identified in the Village Design Statement, are valued for their informal, unlit and path-less character. It is unclear how such "enhancements" could be achieved without eroding those defining qualities.
- 6.1.7 Policy SD12 requires a heritage impact study to accompany any application for Brhe 09. However, this further underscores the sensitivity of the site. Yet the Site-Selection Assessment rejected similar sites (e.g. Brhe 05) on the basis of comparable heritage harm, indicating inconsistency in decision-making and reinforcing concern over the robustness of the allocation.
- 6.1.8 This review therefore concludes that development in principle on site Brhe 09 would be contrary to the Blackdown Hills Management Plan policy and guidance set out in section 4 above and would likely give rise to unacceptable landscape and heritage impacts. Even with the proposed SD12 policy safeguards, the site is unlikely to be deliverable and its allocation risks undermining the Local Plan's soundness by creating a misleading expectation of developability.

This review and analysis strongly suggests that the most appropriate approach for accommodating limited growth in Broadhembury would be a bespoke, dispersed strategy based on identifying small-scale opportunities consistent with village form and character.

Development which comes forward as individual, windfall proposals supported by detailed heritage and landscape assessment is likely to achieve a better degree of fit. This would enable the Local Planning Authority, in reviewing an application, to exercise its statutory duties — including having regard to the purposes of National Landscape designation — and to ensure that any change sustains and enhances the special qualities of Broadhembury and its landscape.



Key

-  Blackdown Hills National Landscape
-  Listed Buildings
-  Public Rights of Way
-  Conservation Area
-  Sites



0m 100m 200m

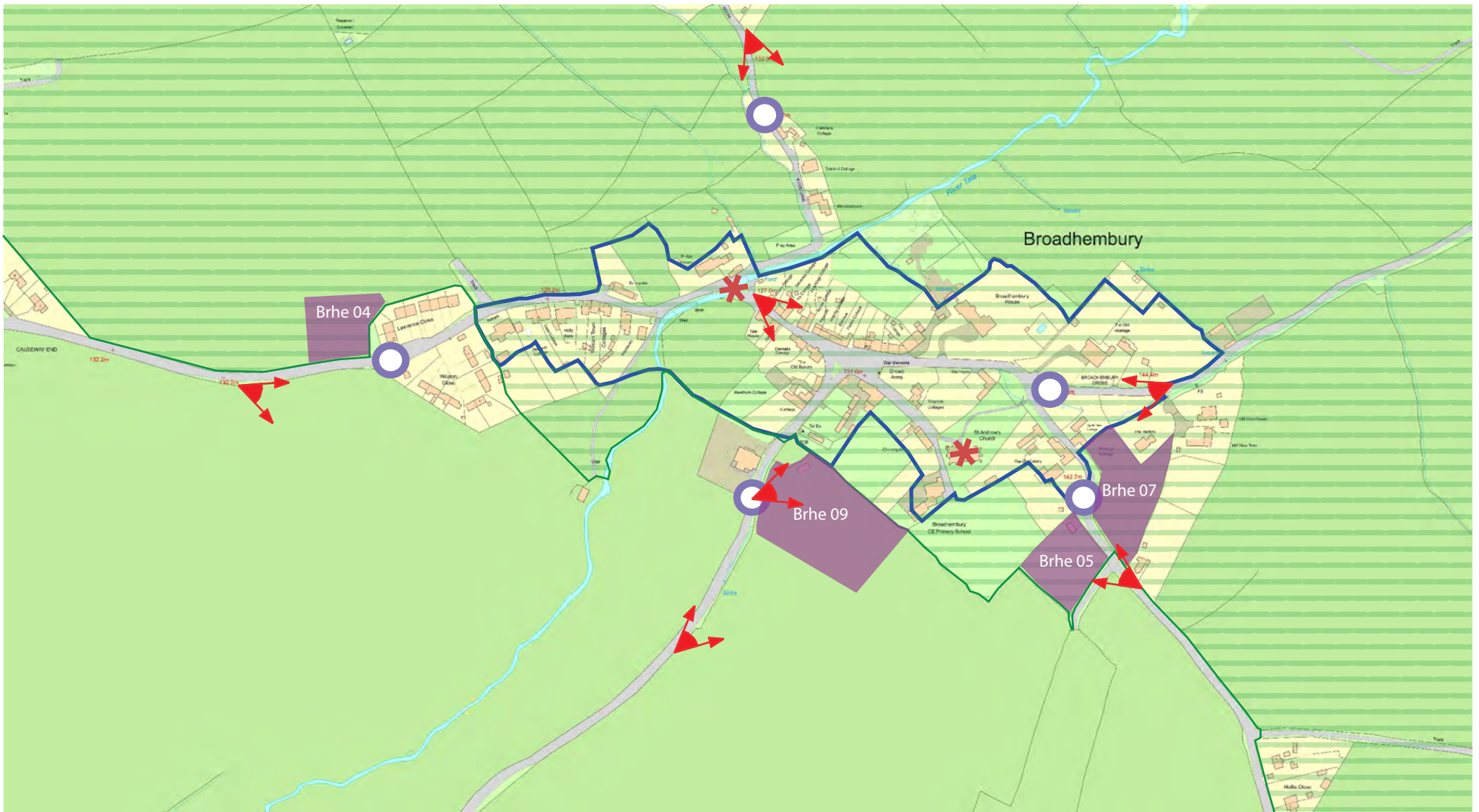


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Broadhembury
Site Selection Review

Figure 1: Context





Key

-  Landmarks (bridge/ford and church)
-  Key views to church
-  Gateway
-  Conservation Area
-  Blackdown Hills National Landscape



Broadhembury
Site Selection Review

Figure 2: Analysis



Figure 3: Settlement Form and Character