

# BROADHEMBURY PARISH COUNCIL

Colliton | Dulford | Kerswell | Luton

To: Edward Freeman,  
Service Lead and Assistant Director Planning, Strategy and Development  
Management,  
East Devon District Council,  
Blackdown House,  
Border Road,  
Honiton,  
EX141EJ

From: Chair – Broadhembury Parish Council  
Hayne Farm  
Dulford  
EX15 2ED

CC: Clerk – Broadhembury Parish Council  
15 Batts Lane,  
Ottery St Mary  
EX11 1EY

EAST DEVON DISTRICT COUNCIL ECONOMY			
17 DEC 2025			
ACK	CIRC	SEEN	FILE

Tuesday, 16<sup>th</sup> December 2025

*Dear Mr. Freeman,*

## **Submission by Broadhembury Parish Council to Regulation 19 Second Stage Consultation on EDDC Local Plan .**

We are writing to you personally because you may not have been briefed by your Officers on our concerns about the extent to which the proposals in your draft Local Plan for housing development in Broadhembury fail to comply with the law. Given the quantity and range of documents your department has produced and received, and the number of meetings required to get to this stage, any lack of detailed knowledge on your part is understandable .

Broadhembury Parish Council has commissioned an independent consulting report to determine whether your site selection process has been carried out in a systematic and consistent way, and whether you have complied with the law relating to Protected Landscapes. This report is attached and it forms the detail of our submission to the Planning Inspectorate. It elaborates on our submission to you in March 2025 in response to your first stage consultation and is consistent with our first comments to your department in 2023.

In summary the report documents that sites have been reviewed in an inconsistent and ‘apparently biased’ way and that your legal duty to further the purposes of a Protected Landscape as enacted in LURA (23) has not been observed and complied with. The Broadhembury Parish Council believes that these points go way beyond any questions of the Plan’s ‘soundness’; if found to be substantial at Inquiry then they risk placing your Authority in legal jeopardy.

I would emphasise that since the drafting of the various documents which contribute to your Plan, your department has approved for Outline permission, the alternative site which you discard in your Local Plan assessment. This is also the site preferred by the Parish Council. It is the one which will cause least harm to the Protected Landscape and where mitigation can be most effectively designed.

We would urge you to give personal and serious consideration to the points made in the report and reconsider the site allocation proposal in the Local Plan for Broadhembury as a result. If you are unable to do this we shall pursue our arguments at Public Inquiry and, since we believe a point of law is at stake, we shall pursue the argument beyond if unable to persuade the Inspector of the merits of our case.

On behalf of Broadhembury Parish Council,

Yours sincerely,



Jan Keeling  
Chair - BPC

# Broadhembury

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



## Contents

<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>1</b>
1.1	APPOINTMENT .....	1
1.2	PURPOSE OF THE STUDY .....	1
1.3	BROADHEMBURY – LOCATION AND CONTEXT .....	1
<b>2.0</b>	<b>EAST DEVON LOCAL PLAN AND SITE SELECTION PROCESS.....</b>	<b>2</b>
2.1	LOCAL PLAN BACKGROUND.....	2
2.2	SITE SELECTION PROCESS.....	3
2.3	DUTY TO FURTHER THE PURPOSES OF DESIGNATION .....	4
<b>3.0</b>	<b>SPECIAL QUALITIES OF BROADHEMBURY AND ITS ENVIRONS.....</b>	<b>7</b>
3.1	LANDSCAPE CHARACTER.....	7
3.2	BLACKDOWN HILLS SPECIAL QUALITIES.....	7
3.3	BROADHEMBURY VILLAGE .....	10
3.4	CONCLUSIONS .....	14
<b>4.0</b>	<b>GUIDANCE ON APPROPRIATE CHANGE .....</b>	<b>15</b>
4.1	PAST CHANGE .....	15
4.2	GUIDANCE FOR ACCOMMODATING CHANGE.....	15
4.3	CONCLUSIONS .....	17
<b>5.0</b>	<b>JUDGEMENTS WHICH LED TO IDENTIFICATION OF BRHE 09 .....</b>	<b>18</b>
5.1	APPROACH.....	18
5.2	SUSCEPTIBILITY .....	19
5.3	VALUE.....	20
5.4	SENSITIVITY.....	21
5.5	HERITAGE AND ECOLOGY.....	21
5.6	EXTENT TO WHICH LOCAL PLAN PROCESS FOLLOWS GUIDANCE FOR INTEGRATION OF NEW DEVELOPMENT	
5.7	EXTENT TO WHICH LOCAL PLAN PROCESS CONSIDERS DUTY TO HAVE REGARD.....	23
<b>6.0</b>	<b>CONCLUSIONS .....</b>	<b>24</b>
6.1	SHOULD SITE 09 BE AN ALLOCATION IN THE EAST DEVON LOCAL PLAN? .....	24

## 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).
<b>Draft Local Plan (Reg 18) Consultation</b>	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).
<b>Draft Local Plan (Reg 18) Consultation Feedback Report</b>	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

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.

- 2.3.8 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.

*'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

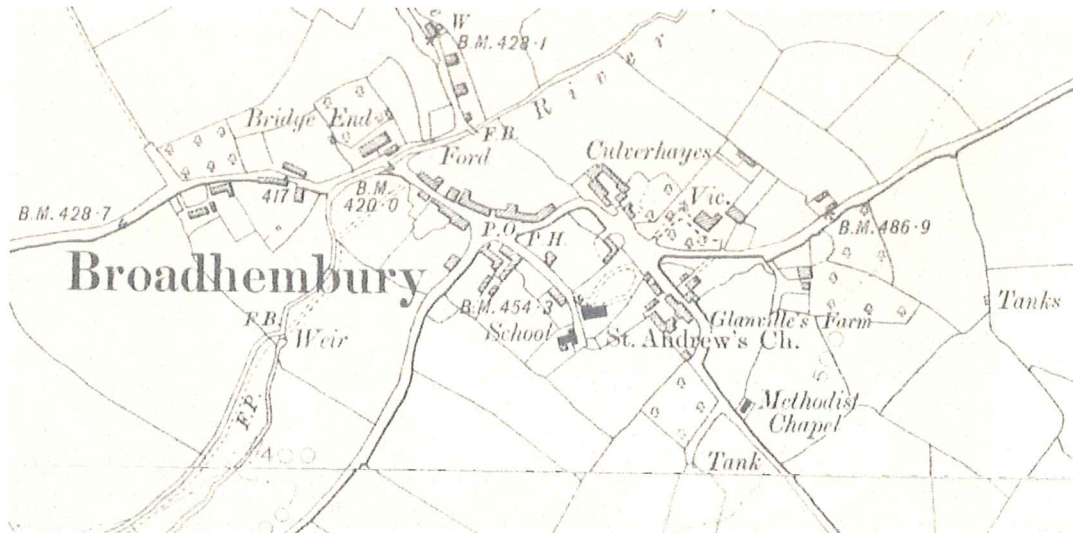
### 3.3 Broadhembury Village

- 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 15<sup>th</sup> century church house, and the parish church, consecrated in 1259

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*



## 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.

#### 4.2.3 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 proposals<sup>1</sup>. 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*

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

## 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				

- 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.

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]

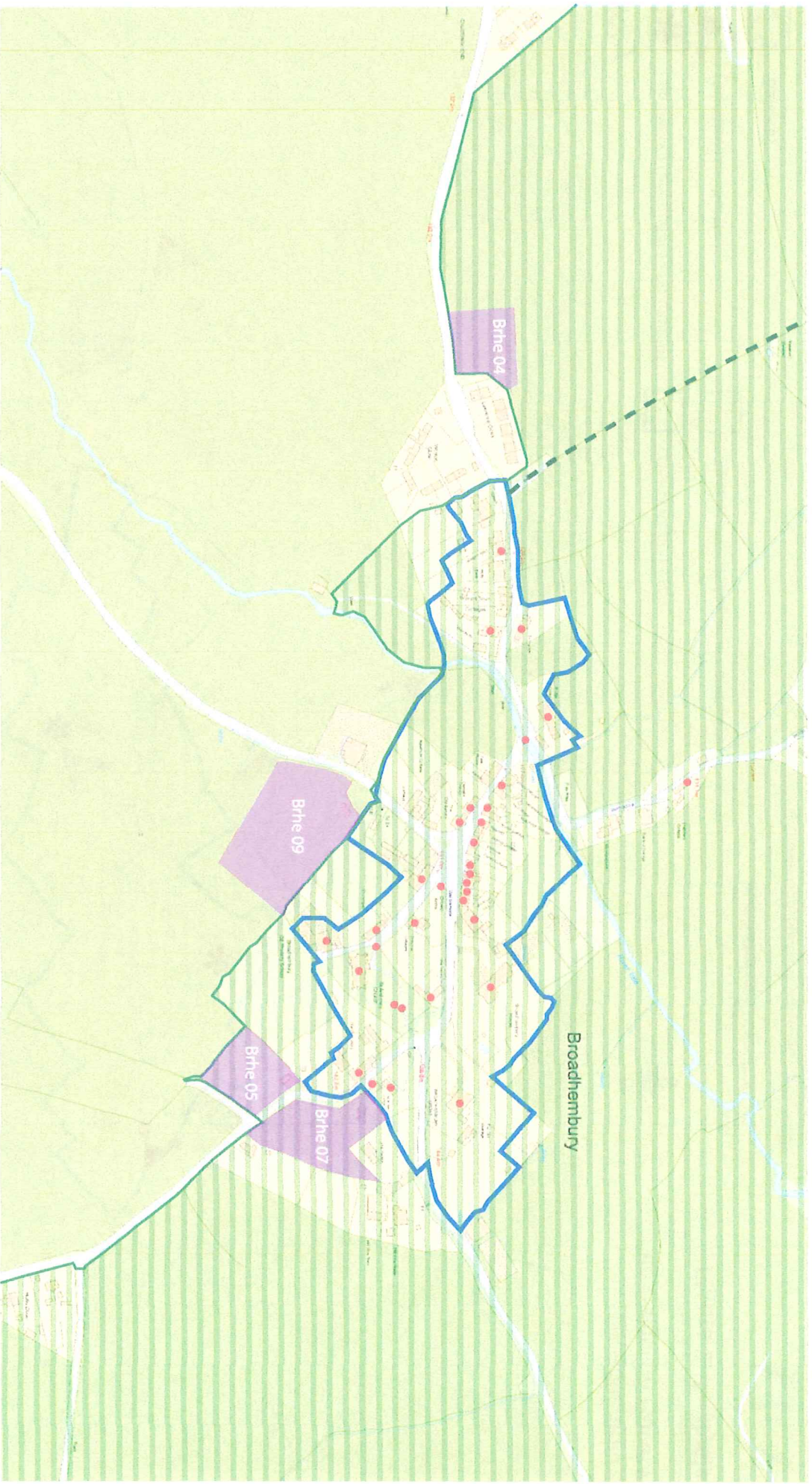
- 5.6.2 Guidance set out in section 4 and specifically the Blackdown Hills Management Plan, highlights the importance of conserving and enhancing the special qualities of Broadhembury and notes particular concern regarding development on the margins of the settlement.
- 5.6.3 Taking each of the requirements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

## 6.0 Conclusions

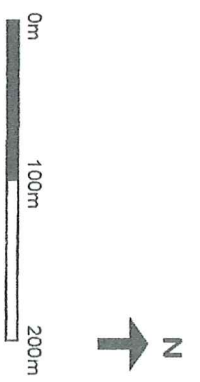
### 6.1 Should site 09 be an allocation in the East Devon Local Plan?

- 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.



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



**Broadhembury  
Site Selection Review**

**Figure 1: Context**

© Crown Copyright and database rights 2025  
Ordnance Survey AC0000808122

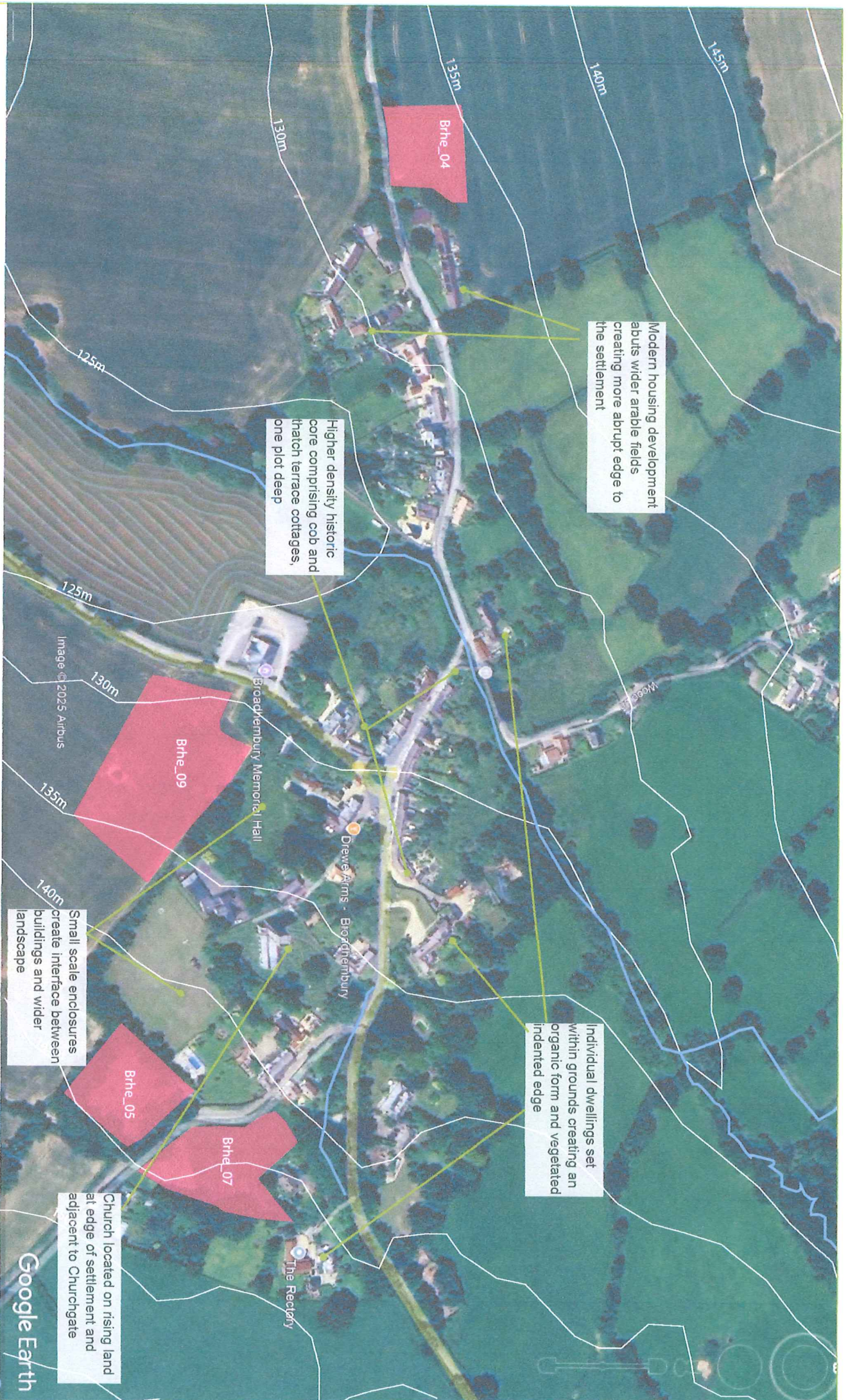


Figure 3: Settlement Form and Character