

Response to EDDC Local Plan

12th January 2023

Broadhembury

Please read both Attachment 1 (BNCLT's fully detailed report), and Attachment 2 (maps and illustrations) as a part of this response to the local plan.

1. Site BRHE_09

- a. As a resident of Broadhembury I am strongly against any proposals that allow open-market housing close to the historic core of the village but strongly support the provision of affordable housing for local people. I therefore want to see site BRHE_09 and the reintroduction of the village settlement boundary removed from the plan proposals.
- b. Broadhembury village is a unique historic gem dating from the 1200s. The core of the village is a Conservation Area with approximately 40 houses of cob with thatched roofs dating from the late 16th and early 17th centuries. Together these form a rare set piece of listed buildings of the same vernacular. The majority of the buildings are grade 2 listed, but 3 are grade 2* listed, and St Andrews church is grade 1 listed and dates from 1259.
- c. BRHE_09 would require the loss of a significant length of roadside hedgerow and significant ground re-modelling. Development of the site would result in the irreversible loss of the heritage vista at entrance to village. The intervisibility with and from the village heritage asset would also be irreversibly lost. The Broadhembury Neighbourhood Community Land Trust (BNCLT) also note that to achieve safe access may require the cooperation of a third-party landowner.
- d. Land to both immediately to the east (Memorial Hall) of BRHE_09 is nominated as a "Dark Sky Discovery Site". Additionally, other public and private land in the area is (including the Drewe Arms garden) is used in conjunction with the nominated site. The value of the nominated site and adjacent areas is two-fold:
 - The unique village setting with uninterrupted views – without artificial light pollution - of the night sky.
 - The night time wildlife (including but not limited to rare barbastelle bat species) that occupy areas adjacent to BRHE_09 (and likely within it as well) enabled by there being no artificial light pollution.
- e. The draft local plan provided for public consultation shows a site (BRHE_09) opposite the Memorial Hall in Broadhembury village as a "second choice" (amber) location for 10 homes
 - BRHE_09 was rejected by the local community in 2016. Broadhembury Parish Council (BPC) polled the local community, with a majority (60% of responses) rejecting the site.
 - BNCLT have subsequently (2021) polled its members, again the majority (85% of responses) rejected BRHE_09 – even for affordable homes.
 - A majority of attendees at a community meeting organised by BNCLT on 15th December 2022 again rejected BRHE_09.
 - A review of the comments made concerning BRHE_09 on the EDDC Commonplace website (13:00 on 12th January 2023), shows 19 responses have been recorded. All of these reject the use of BRHE_09. EDDC will also be aware that other objections have been made by paper postal means.
 - The reason why the community do not support BRHE_09 are documented on the EDDC Commonplace website and in Attachment 1, Appendix 1 and Appendix 2.

- Attachment 2 was developed by BNCLT in conjunction with the local community through a number of meetings and discussion throughout 2020, 2021, and 2022.
 - EDDC planners have constantly stressed to BNCLT that community support is needed for any proposed new development.
 - BRHE_09 does not have community support.
 - BRHE_09 should therefore be deleted from the EDDC local plan.
- f. The draft local plan also proposes that a “settlement boundary” is introduced around Broadhembury village, and that BRHE_09 is inside that boundary
- The inclusion of a settlement boundary would enable housing to be built upon BRHE_09 (or any other site within the boundary) without explicit community support.
 - Land within a settlement boundary could permit the building of market homes without the provision of affordable homes.
 - Without a settlement boundary, affordable homes are a pre-requisite for any building.
 - There is substantial community support for affordable homes, without market homes, on an appropriate site.
 - BNCLT have been established by the community to obtain an appropriate site for those affordable homes. We are in the process of doing that. The inclusion of BRHE_09 and the settlement boundary within the EDDC local plan frustrates the provision of those affordable homes that are needed and supported by the community.
 - The settlement boundary should therefore be deleted from the EDDC local plan.
- g. Since the draft local plan was provided by EDDC for public consultation, the Government have changed the policy on housing targets
- The countrywide annual target was 300,000 new homes. In early December 2022 the levelling-up and regeneration bill was pulled from the Commons when enough MPs backed an amendment scrapping the target. The prime minister has agreed that the number will instead be “advisory”, and that local authorities can discount it if constructions threaten to change the character of an area.
 - BECAUSE BRHE_09 is ranked as “second choice” (amber), which in itself recognises that EDDC have reservations with proposing the site...
 - ... AND because construction on BRHE_09 would change the character of the area (see points elsewhere in this document)...
 - ... AND because the local community has stated that it does not support BRHE_09 as it would change the character of the area...
 - ... THEN BRHE_09 should be discounted. That is, it should be removed from the local plan.
- h. In summary
- There is no central government requirement to meet what are now defined as “advisory” housing numbers through building on land that would change the character of the area.
 - BRHE_09 must not be built upon because it does not have community support (mainly because it would change the character of the area – see Attachment 1, appendix 1 and 2).
 - EDDC recognise the reservations with BRHE_09 as it is ranked as “second choice” (amber) within the draft local plan.

- Any additional future requirement for new homes should be met through continuing BNCLT activities – and be for affordable homes for local people.
- BNCLT have been established by the local community in order to obtain an appropriate site upon which those affordable homes that are needed by the local community can be built with the support of the local community. We are undertaking that task, but our efforts have become frustrated by the inclusion of BRHE_09 and a settlement boundary around Broadhembury village.
- Please remove BRHE_09 and the settlement boundary from the local plan.

2. BRHE_05 and BRHE_07

- a. The rejection of these sites by EDDC within the draft local plan is supported.
- b. Additionally, the sites are similar in nature to those described by planning refusals EDDC 21/0117/PIP and EDDC 82/P0325.
- c. Additionally, please see attachment 2 where the additional contribution to village flooding if these sites were utilized is illustrated.

3. BRHE_04

- a. This site – for affordable homes only, and without a settlement boundary – is worthy of further consideration.

4. Alternative solutions

- a. Broadhembury Community Land Trust (BNCLT)
 - Affordable homes.
 - The Trustees of BNCLT have approached EDDC with a plan to establish 4 affordable homes, supported by 2 market homes on a site at a location of which EDDC are aware.
 - Furthermore, the Trustees state they will continue consultation with other landowners who own land that is likely to gain community support for an 'exception site' allocation of affordable homes should further such homes be needed in the future.
- b. Permitted Development Part Q (PDQ)
 - Market homes.
 - Since approximately 2020, a number (probably greater than 10, but EDDC should publish the numbers) of homes have been established within Broadhembury Parish through the PDQ approval mechanism.
 - Currently (as of January 2023) there are a number (probably 5, but EDDC should publish the numbers) of homes within Broadhembury Parish that are either in the PDQ planning approval system, or recently approved.
 - It is highly probable that the trend of increasing housing numbers through the PDQ mechanism within Broadhembury Parish will continue.

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12th January 2023

Broadhembury

Attachment 1

Contents:

Broadhembury Neighbourhood Community Land Trust (BNCLT) document

The document accurately reports on the assessment of (primarily) BRHE_09, but also remarks upon
BRHE_04, _05, and _07

Please take the entire contents of this BNCLT document – including both appendix 1 and appendix 2
– as a part of my rejection of site BRHE_09, _05, and _07



Document:

Produced to enable discussion of the draft EDDC Local Plan release for public consultation with BNCLT members and parishioners.

Notes prepared for the public meeting of 15th December 2022 held in St Andrews Church, Broadhembury.

Prior to the meeting the input from members who apologised for not being able to attend, but also provided input, were incorporated within the notes.

The notes have been updated since the meeting to account for the discussion of members and parishioners.

Deadline:

EDDC require all responses to be submitted before Sunday 15th January 2023.

Section 7 below lets you know how to make your response.

Prepared by:

Trustees

Broadhembury Neighbourhood Community Land Trust

Broadhembury Neighbourhood Community Land Trust is a charitable Community Benefit Society registered under the Co-operative and Community Benefit Societies Act 2014, registration number 8495.

1. Purpose of meeting

- a. To discuss with BNCLT Members the impact that the draft EDDC Local Plan will have on the provision of four affordable homes in Broadhembury Parish.
- b. To assemble Members thoughts to enable BNCLT Trustees (us) to response to EDDC.
- c. To inform individual Members that they may respond to EDDC themselves.

2. Background (a potted history)

Around 2016

- It was proposed that a number of Market Homes, together with a small number of Affordable Homes, were to be built in the field opposite the Memorial Hall.
- This proposal did not gain community support – as demonstrated by a poll conducted by BPC.
- The proposed project did not continue.

2020

- A survey organised by BPC indicated a need for 4 affordable homes within the Parish.
- BNCLT was established with the aim of providing those homes.
- The constitution of BNCLT ensures that we can only provide affordable homes in a location that has community support.

2021

- BNCLT proposed a site that would contain only four affordable homes – no market homes.
- The proposal was rejected by the community as not being suitable.
- BNCLT surveyed members.
- Key outcome 1 – Affordable homes would be supported by the community if a suitable location could be found.
- Key outcome 2 – The site opposite the Memorial Hall does not have community support.
- BNCLT met with Members (November 2021) in order to establish criteria that would be required for a site to gain community support.
- Those criteria were added to the planning criteria laid down by EDDC.

2022

- A number of potential sites were assessed against those criteria.
- Confidential discussions have been held with a number of landowners concerning sites where community support is thought to be possible.
- Only one landowner indicated potential support.
- Other landowners have (confidentially) contacted us recently. We, of course, discuss and assess each potential opportunity as it arises.

Now

- EDDC recently issued their draft of the local plan which sets out how East Devon will change (housing and employment land) between now and 2040.
- The draft has been issued for public consultation.
- A number of Members who are unable to attend this meeting have written to us indicating their frustration with EDDCs proposals.

3. A few definitions

- a. Community support
 - The support of local people.
- b. Settlement Boundary
 - Also known as Development Boundary, and Built-up Area Boundary (BUAB).
 - A boundary drawn around a village to define the area within which future development is preferred by the planning authority.
 - Outside of the boundary, future development is only permitted by an “exception site”, “Part Q”, or “Agricultural reason”.
 - Currently, there are no Settlement Boundaries within Broadhembury Parish. However, the draft local plan seeks to add a boundary around Broadhembury village and some of the surrounding land.
- c. Affordable home
 - A home provided at lower-than-normal market prices or rents.
 - For a home provided in conjunction with a CLT, they are held in perpetuity for the benefit of the community, and usually rented at 80% of that typical for the district.
- d. Market home
 - A home built, sold, or rented at normal market values.
- e. Part Q
 - More correctly referred to as Permitted Development Part Q (PDQ).
 - The planning authority process that grants permission to convert agricultural buildings to homes.
- f. Exception site
 - A site outside of a Settlement Boundary upon which permission to build homes is sought.
- g. Red, Amber, and Green sites
 - The local plan defines “red” sites as those discarded by the EDDC process of developing the plan prior to the public consultation process.
 - “Green” sites are those found to be preferred by EDDC through the strategic planning process. There are no “green” sites identified within Broadhembury parish.
 - “Amber” sites have been identified by the EDDC strategic planning process as being of “second choice”.
 - The draft local plan provides the reason why each site has been categorised the way has.
- h. Government housing targets
 - Nationally, the Government has previously stated that 300,000 new homes are to be built every year.
 - Allocations have been flown down to local authorities.
 - To meet central Government housing targets for East Devon all Green and Amber sites within East Devon would need to be built upon.
 - However, the “targets” have now become “advisory” – so things have changed. In particular, local authorities can discount the number where developments threaten to change the character of an area.
- i. HELAA
 - Housing and Economic Land Availability Assessment.
 - Previously known as Strategic Housing Land Availability Assessment (SHLAA).
 - The process used to invite landowners to put land forward for assessment by EDDC.

4. What the draft plan means for the provision of affordable homes

- a. For Broadhembury it shows one site for 10 houses – a 5 acre section on the field opposite the Memorial Hall.
- b. It also shows EDDC intention to introduce a “Settlement Boundary”. That boundary has been drawn to include the site opposite the Hall.
- c. This paves the way for 10 market homes (possibly at 0.5 acres each) – with no affordable homes – to be built on a site that historically does not have community support.
- d. Because the site does not have community support, BNCLT have not, cannot, and have no intention to propose the use of this land for housing.

5. Site assessment criteria – and how it relates to the site opposite the Memorial Hall

- a. See appendix 1 and appendix 2 for summary.
- b. Each potential site was assessed against 24 criteria.
- c. BRHE_09 ranks 10th out of 12 sites studied.
- d. Two of the “red” sites in the draft local plan rank lower than BRHE_09.
- e. One of the “red” sites ranks higher.

6. Key principles that we are drafting into BNCLTs response to EDDC

- a. The draft local plan provided for public consultation shows a site (BRHE_09) opposite the Memorial Hall in Broadhembury village as a “second choice” (amber) location for 10 homes
 - BRHE_09 was rejected by the local community in 2016. Broadhembury Parish Council (BPC) polled the local community, with a majority (60% of responses) rejecting the site.
 - BNCLT have subsequently (2021) polled its members, again the majority (85% of responses) rejected BRHE_09 – even for affordable homes.
 - The reason why the community do not support BRHE_09 are summarised in Appendix 1 and Appendix 2.
 - EDDC planners have constantly stressed to BNCLT that community support is needed for any proposed new development.
 - BRHE_09 does not have community support.
 - BRHE_09 should therefore be deleted from the EDDC local plan.
- b. The draft local plan also proposes that a “settlement boundary” is introduced around Broadhembury village, and that BRHE_09 is inside that boundary
 - The inclusion of a settlement boundary would enable housing to be built upon BRHE_09 (or any other site within the boundary) without explicit community support.
 - Land within a settlement boundary could permit the building of market homes without the provision of affordable homes.
 - Without a settlement boundary, affordable homes are a pre-requisite for any building.
 - There is substantial community support for affordable homes, without market homes, on an appropriate site.
 - BNCLT have been established by the community to obtain an appropriate site for those affordable homes. We are in the process of doing that. The inclusion of BRHE_09 and the settlement boundary within the EDDC local plan frustrates the provision of those affordable homes that are needed and supported by the community.
 - The settlement boundary should therefore be deleted from the EDDC local plan.

- c. Since the draft local plan was provided by EDDC for public consultation, the Government have changed the policy on housing targets
- The countrywide annual target was 300,000 new homes. In early December 2022 the levelling-up and regeneration bill was pulled from the Commons when enough MPs backed an amendment scrapping the target. The prime minister has agreed that the number will instead be “advisory”, and that local authorities can discount it if constructions threaten to change the character of an area.
 - BECAUSE BRHE_09 is ranked as “second choice” (amber), which in itself recognises that EDDC have reservations with proposing the site...
 - ... AND because construction on BRHE_09 would change the character of the area (see points elsewhere in this document)...
 - ... AND because the local community has stated that it does not support BRHE_09 as it would change the character of the area...
 - ... THEN BRHE_09 should be discounted. That is, it should be removed from the local plan.
- d. In summary
- There is no central government requirement to meet what are now defined as “advisory” housing numbers through building on land that would change the character of the area.
 - BRHE_09 must not be built upon because it does not have community support (mainly because it would change the character of the area).
 - EDDC recognise the reservations with BRHE_09 as it is ranked as “second choice” (amber) within the draft local plan.
 - Any additional future requirement for new homes should be met through continuing BNCLT activities – and be for affordable homes for local people.
 - BNCLT have been established by the local community in order to obtain an appropriate site upon which those affordable homes that are needed by the local community can be built with the support of the local community. We are undertaking that task, but our efforts have become frustrated by the inclusion of BRHE_09 and a settlement boundary around Broadhembury village.
 - Please remove BRHE_09 and the settlement boundary from the local plan.

7. How to respond to EDDC yourself

- a. Please - Don't just leave it to BNCLT. It's better if more people respond. Don't just leave it to others in your household. Provide a response of your own.
- b. You do not need to be a Member of BNCLT to respond to EDDC.
- c. We will send all BNCLT Members our notes from this meeting. You are welcome to use those notes to assist in writing your own responses to EDDC – but please personalise your response as that is more effective.
- d. Here is how you let EDDC know what you think
 - Read the entire plan text version
[commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf)
 - Respond by letter
Planning Team/Local Plan consultation
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ
 - Or respond online
EDDC engagement platform which provides a summary of Local Plan content only
[Have Your Say Today - East Devon Local Plan - Commonplace](#)
Top level questionnaire
[Have Your Say Today - Quick Survey - East Devon Local Plan \(commonplace.is\)](#)
Plan details for Broadhembury
[Have Your Say Today - Proposed housing & mixed use site allocations - details - East Devon Local Plan \(commonplace.is\)](#)
Plan details and response form for BRHE_09 (the site opposite the Memorial Hall)
[Have Your Say Today - Broadhembury - LP Brhe 09 - East Devon Local Plan \(commonplace.is\)](#)
To add an attachment (photo, map, pdf, or similar) to supplement your response
[Have Your Say Today - Document Submission - East Devon Local Plan \(commonplace.is\)](#)
- e. EDDC require all responses to be submitted before Sunday 15th January 2023.

Appendix 1 - EDDC Site Selection Factors

Extracted from EDDC - Edge of Settlement Site Methodology - Final Draft Aug 2020

EDDC factor:

Biodiversity and wildlife value

EDDC guidance:

Sites which directly affect nationally and internationally important nature and geology sites will have already been discounted, however, housing sites that are within 250m of an international, national or local designated conservation site still have the potential to affect the biodiversity or geodiversity of those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. It may be possible to mitigate (or even improve) effects, however at this strategic level of assessment this cannot be determined, more specific proposals would need to be developed and submitted as part of a planning application.

Since the likely impact decreases with distance, the effect of sites that are more than 1km from any designated biodiversity or geodiversity sites are likely to be negligible.

Rating system:

1 = Significant negative impact

Paddocks, or fields, that have not been used for intensive agriculture, and have hedgerows or adjacent land that support species of interest.

2 = Minor negative impact

Sites that contain buildings that may be suitable for re-purposing. Those buildings or adjacent land may contain species of interest. Also, potential sites (fields) adjacent to such land or buildings.

3 = Negligible negative impact

Potential sites (fields) that have recently been used for intensive agriculture and are not adjacent to land that contains species of interest.

Finding summary:

Minor negative impact – but part of the site should be rated “significant”.

- BRHE_09 has been rated “minor” – however a part of the site should be rated as “Significant”. Areas adjacent to BRHE_09 contain bat roosts. It is known that the (rare) barbastelle bat species has roosts in land adjacent to BRHE_09. There is a disused building on BRHE_09 that is highly likely to be a roost for barbastelle bats. That building is less than 30 m from the nearest known roost.
- Land to both immediately to the east (Memorial Hall) of BRHE_09 is nominated as a “Dark Sky Discovery Site”. Additionally, other public and private land in the area is (including the Drewe Arms garden) is used in conjunction with the nominated site. The value of the nominated site and adjacent areas is two-fold:
 - The unique village setting with uninterrupted views – without artificial light pollution - of the night sky.
 - The night time wildlife (including but not limited to rare bat species) that occupy areas adjacent to BRHE_09 (and likely within it as well) enabled by there being no artificial light pollution.

EDDC factor:

The historic and built environment

EDDC guidance:

Housing sites that are within 250m of designated heritage assets have the potential to have significant negative effects on those assets and their settings, while more distant housing development is likely to be capable of only minor effects and over 1km the effect is likely to be negligible.

Rating system:

1 = Significant negative impact

Adjacent to a listed building, or within the conservation area.

2 = Minor negative impact

Within 250 m of a listed building, or within 250 m of the conservation area.

3 = Negligible negative impact

Greater than 250 m of a listed building or conservation area.

Finding summary:

Significant negative impact

- BRHE_09 is only 50 m from the Drewe Arms which is a grade 2* listed building. The open vista enjoyed by many people from the Drewe Arms garden would be permanently obscured by buildings upon BRHE_09.
- BRHE_09 is also only 100 m from two Grade 2* listed buildings (Theydon Cottages, Church Gate).
- BRHE_09 is only 100 m from a grade 1 listed building (St Andrews Church). The historic view of the Church from the entrance to the village would be permanently lost by building upon BRHE_09.
- BRHE_09 is also adjacent to the Conservation Area boundary.
- BRHE_09 is less than 250 m from about 30 grade 2 listed buildings - some much closer.
- The building of 10 new homes on BRHE_09 would significantly and permanently alter the setting of the listed buildings and the conservation area.
- The vista available from homes (including listed builds) in the western village (towards Causeway End and at about 250 m) would be permanently degraded.

EDDC Factor:

Landscape including AONBs and their settings

EDDC guidance:

Impacts on landscape character

Sites of any size within an AONB, are likely to have a significant negative effect on this objective.

Sites of any size within 250m of an AONB are likely to have a minor negative effect on this objective.

Impact on the setting of the AONB will depend on intervisibility and number of/significance of views from public vantage points.

Rating system:

1 = Significant negative impact

Within the AONB, or prominently visible from the AONB

2 = Minor negative impact

Within 250 m of the AONB, or re-purposed building within the AONB, or adjacent to other non-listed buildings within the AONB

3 = Negligible negative impact

Greater than 250 m from the AONB, and not prominently visible from the AONB

Finding summary:

Significant negative impact

- BRHE_09 shares a boundary with both the Blackdown Hills AONB
- BRHE_09 also shares a boundary with the Conservation Area of Broadhembury village.
- BRHE_09 is less than 250 m from about 30 grade 2 listed buildings - some much closer.
- BRHE_09 is less than 100 m from three grade 2* listed buildings.
- BRHE_09 is only 100 m from a grade 1 listed building (St Andrews Church). The historic view of the Church from the entrance to the village would be permanently lost by building upon BRHE_09.
- All of the above listed buildings are within the Conservation area, they are also within the AONB.
- The Memorial Hall together with its outside area – which is adjacent to BRHE_09 - are public spaces used for enjoyment by visitors to the area, the Conservation Area, and the AONB.
- The Drewe Arms (one of the grade 2* listed buildings) garden is also a space used for enjoyment by visitors to the area, the Conservation Area, and the AONB.
- The intervisibility of BRHE_09 with all of the above is significant and would be permanently damaged by building upon BRHE_09.

EDDC Factor:

Soil quality/agricultural land classification

EDDC Guidance:

Where sites would involve housing development on high quality (grade 1, 2 or 3a) agricultural land there will be a negative effect on preserving soil quality.

Sites that are on grade 1 or 2 agricultural land are likely to have a significant negative effect with the impact decreasing as the quality decreases.

Rating system:

- 1 = Significant negative impact
Land assessed as being grade 3a or better
- 2 = Minor negative impact
Land assessed as being 3b or lower
- 3 = Negligible negative impact
Re-purposed existing buildings

Finding summary:

Minor negative impact

- BRHE_09 is estimated by BNCLT to be grade 3b agricultural land.
- All agricultural land within the parish is estimated to be grade 3b.

EDDC Factor:

Water Source Protection Zones

EDDC Guidance:

These zones are defined by the Environment Agency and extend to 250m or 500m from the source of water to be protected. Development within the zone is likely to have a negative effect if it could pollute the water source.

Rating system:

- 1 = Significant negative impact
Not applicable to any sites
- 2 = Minor negative impact
Not applicable to any sites
- 3 = Negligible negative impact
Not within zone

Finding summary:

Negligible negative impact

- BRHE_09 is not within a water source protection zone.
- No site within the parish is within a water source protection zone.

EDDC Factor:

Access to services and facilities (in particular employment, schools, cultural, leisure, health and community facilities and recreation space)

EDDC Guidance:

Where housing sites are within walking distance (600m) of community services and facilities, residents will be more easily able to access these facilities. Good public transport links will also be beneficial as they will enable residents to reach services and facilities that are further away without having to rely on the use of private cars.

The effects of housing development on education, will depend on the availability of school and college places to serve the growing population, but for the purposes of the assessment it should be based on proximity to existing schools and assumed there will be capacity to accommodate new pupils.

- Sites that are within 600m of three or more community services/facilities as well as one or more public transport nodes, will have a significant positive effect.
- Sites that are within 600m of two or more community services/facilities (regardless of proximity to public transport nodes) will have a minor positive effect.
- Sites that are within 600m of one community service/facility and/or one public transport node will have a negligible effect.
- Sites that are more than 600m from any community services/facilities or public transport nodes will have a significant negative effect.

Rating system:

- 1 = Significant negative impact
More than 1200 m from services
- 2 = Minor negative impact
Between 600 and 1200 m of services
- 3 = Negligible negative impact
Less than 600 m to services

Finding summary:

Significant negative impact

- If the rating system is naively used at face value, then a finding of “negligible negative impact” would result. However, a significant number of journeys by every parishioner are made on a daily basis to nearby towns. In real terms there is “Significant negative impact”.
- Note that access to employment, cultural, leisure, health facilities, or secondary schools are not available anywhere in the parish. Thus, the rating is based upon distance to what is available within the parish. If distance to facilities outside of the parish is measured the rating would change.
- It should also be noted that parishioners (including those within Broadhembury village) need to make regular journeys to nearby town (usually Cullompton or Honiton – but often further afield to Taunton or Exeter) to access many services and facilities. It is typical to travel for employment, schools, cultural, leisure, health, community facilities, and shops).
- It is true that Broadhembury village does have some facilities. However, despite this, essential regular journeys (typically every working day) are made by residents to the nearby towns. For this reason, the overall finding should be one of “significant negative impact”.

EDDC Factor:

Designation as open space and recreation facilities, including Local Green Space

EDDC Guidance:

Sites of any size within a designated open space, recreation facility or local green space are likely to result in a significant negative effect.

Development adjacent to an open space, recreation facility or local green space may impact negatively on its use or setting, eg by overlooking or noise, but this may be offset by proximity for users and increased security.

Rating system:

1 = Significant negative impact

Proposed site within a designated green space

2 = Minor negative impact

Proposed site adjacent to a designated green space

3 = Negligible negative impact

Proposed site neither in, nor adjacent to, a designated green space

Finding summary:

Negligible negative impact

- BRHE_09 is not a designated open space or recreation facility.
- No potential site in the parish is a designated open space or recreation facility.

EDDC Factor:

Employment land supply

EDDC Guidance:

Taking out the considerations around new housing increasing the number of economically active residents and the suitability of the employment on offer, the assessment should consider the ability of residents to easily access the existing employment opportunities in those areas.

Sites that are within 600m of an employment site will have a significant positive effect as residents are potentially able to walk to work. Sites that are further than 600m from an employment site, but which are within 600m of public transport links may have a positive effect although this is uncertain depending on whether those links will provide convenient access to employment sites.

Sites that are further than 600m from an employment site and any public transport links should be considered as significantly negative.

Housing sites of any size within an employment site should also be viewed as significantly negative due to reducing land available for employment use and limitations imposed on the type of business activity which can then take place.

Rating system:

1 = Significant negative impact

Proposed site further than 600m from an employment site or an appropriate public transport link. Alternatively proposed site is within an employment site

2 = Minor negative impact

Proposed site within 1200 m of an employment site

3 = Negligible negative impact

Proposed site within 600 m of an employment site

Finding summary:

Significant negative impact

- BRHE_09 is a significant distance from employment sites. The nearest recognized sites are in Cullompton or Honiton. Many residents travel further afield to Taunton or Exeter.
- There are no useful public transport links to employment sites. One bus service to Honiton exists – but this is only twice weekly and even then, not at useful times.

EDDC Factor:

Access to public transport

EDDC Guidance:

This will be assessed in conjunction with accessing facilities. As a stand-alone consideration, where housing sites are within close proximity of public transport links there will be better opportunities for residents of the new housing to make use of non-car-based modes of transport for other journeys too, especially when travelling further afield for work. This means that sites that are within 600m of public transport links will have a positive effect, and this is reversed where sites are more than 600m from public transport links.

Rating system:

1 = Significant negative impact

Proposed site further than 600m from a public transport link

2 = Minor negative impact

Proposed site within 600 m of a public transport link that runs infrequently (twice per day or less)

3 = Negligible negative impact

Proposed site within 600 m of a public transport link

Finding summary:

Significant negative impact

- BRHE_09 is less than 600 m from a bus route. However, the bus service (to Honiton only) is only twice weekly and even then, not at useful times for employment purposes.
- If the rating system is naively used at face value, then a finding of “minor negative impact” would result. However, a significant number of journeys by every parishioner are made on a daily basis to nearby towns. In real terms there is “Significant negative impact”.

EDDC Factor:

Highway access, pedestrian and cycle links

EDDC Guidance:

This will need the safety and suitability of the highway access to be assessed and will require a judgement (possibly with input from a technical expert) as to whether an appropriate vehicular and or pedestrian access can be achieved.

It may be necessary to consider a larger site if major infrastructure improvements are required or if access can best be achieved using land outside the immediate site.

At a minimum, a safe and suitable vehicular and pedestrian access must be achievable. Proximity to community facilities and services via continuous pedestrian and cycle routes should be a positive, accorded greater weight the more facilities and services are available.

If additional land or major infrastructure is required this should be assessed in further detail.

There is also a wider consideration concerning whether access between the town and the main road network is safe, suitable and has capacity to accommodate further traffic. All access should be assessed on their merits but it is likely that where roads leading from a town to the main highway network are class 3 or 4, large housing development is likely to result in a negative effect.

Rating system:

1 = Significant negative impact

Proposed site has poor or unsafe access to highway

2 = Minor negative impact

3 = Negligible negative impact

Proposed site has good access to highway

Finding summary:

Significant negative impact

- BRHE_09 is located in a rural setting on the edge of Broadhembury village. The western edge of the site is adjacent to a single lane road on a bend.
- A large visibility splay would be required. Such a splay would mean the removal of an established "Devon bank hedge".
- The access to this BRHE_09 has previously been considered by EDDC as part of a SHLAA assessment process, and found to be only possible with the cooperation of an adjacent landowner. That landowner has been approached by BNCLT as a part of this evaluation – that land is not, and will not be, available.

EDDC Factor:

Flood risk

EDDC Guidance:

While it is recognized that new development in any location may offer good opportunities to incorporate SuDS, development of new housing on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are large in size or are within high risk flood zones.

Sites that are entirely or mainly on greenfield land that is within flood zones 2, 3a or 3b are likely to have a significant negative effect but this reduces as the flood risk category diminishes and will be lower on brownfield sites, especially outside flood zones 2, 3a or 3b.

Rating system:

1 = Significant negative impact

Proposed site known to flood.

Proposed site would increase area of impermeable surface uphill from existing housing areas known to flood.

2 = Minor negative impact

Proposed site would increase area of impermeable surface uphill from non-housing areas known to flood.

3 = Negligible negative impact

Proposed site known not to flood.

Proposed site does not increase impermeable surface uphill from existing housing areas known to flood.

Proposed site re-purposes existing buildings.

Finding summary:

Minor negative impact

- BRHE_09 in itself does not flood. However, it is raised ground above a flood risk area. In periods of heavy rain substantial quantities of water flow across BRHE_09.
- The water that runs off of BRHE_09 is partly the cause of the damage that occurs to the lane between Grange Cross and Broadhembury Village.
- The water retention – that prevents even more road damage and flooding downstream - value of BRHE_09 is likely to be significant.

EDDC Factor:

Noise impact

EDDC Guidance:

Residents of housing sites that are within close proximity of the strategic road network could experience adverse noise impacts from vehicle traffic, particularly where roads lead to and from the major development areas at East Devon's West End. The development of the new housing sites themselves could also result in increased noise levels in the surrounding area, both during development and in the longer-term as a result of increased vehicle traffic. Negative effects in this sense are particularly likely where sites are large in size or are located adjacent to a high number of sensitive receptors such as existing residential properties, schools or workplaces.

Rating system:

1 = Significant negative impact

Proposed site close to strategic road network. (There is no strategic road network in the parish).

2 = Minor negative impact

3 = Negligible negative impact

Proposed site not close to strategic road network

Finding summary:

Negligible negative impact

- BRHE_09 is not in the proximity of any high noise source.
- The village of Broadhembury is rural and tranquil. Any development within the area would need to be of small scale and incorporate measures that eliminate noise generation. Wildlife, especially night wildlife, should not be put under the strain of noise.
- Areas adjacent to BRHE_09 contain bat roosts. It is known that the (rare) barbastelle bat species has roosts in land adjacent to BRHE_09. There is a disused building on BRHE_09 that is highly likely to be a roost for barbastelle bats. That building is less than 30 m from the nearest known roost.

EDDC Factor:

Infrastructure capacity

EDDC Guidance:

Infrastructure availability and requirements will vary between settlements but should include mains sewers and water supply, electricity, gas, broadband and other telecommunications and (if available at that settlement or required by the scale of development) district heating network.

Sites that are able to achieve all services without requiring access to third party land are considered to have a significant positive impact.

Sites that are able to achieve all services within 250m of the site are considered to have a neutral impact.

Sites that do not have services in close proximity, or where provision will cause harm to the landscape or heritage assets are considered to have a negative impact.

Rating system:

Mains gas, and district heating are not available in the parish. Hence these are not accounted for.

1 = Significant negative impact

Site does not have services in close proximity, or provision will cause harm to landscape or heritage assets

2 = Minor negative impact

Site able to achieve all services within 250m

3 = Negligible negative impact

Sites able to achieve all services without requiring access to third party land

Finding summary:

Significant negative impact

- From minutes of Broadhembury Parish Council (BPC) meeting 9th August 2022: “The Chair made a request for information in relation to the number of times SWW have discharged raw sewage into the River Tale and the length of time this went on for.” “The volume of sewage is not accounted, but for the period March 2020 - May 2022, a recorded 602 occasions where South West Water pumped untreated sewage into the River Tale”.
- The sewage capacity of the pumping station located in Broadhembury village is already exceeded without the addition of any new homes.
- Connection to the mains sewage system from BRHE_09 would require access to (crossing) third party land.

EDDC Factor:

Compatibility with existing and/or proposed surrounding uses/impact on local amenity

EDDC Guidance:

New housing development could have adverse impacts on local amenity as a result of increased vehicle traffic in the surrounding area, and on the character of the local environment if large-scale development takes place on greenfield land.

However, the effects of new housing development on this assessment will depend largely on factors which are not influenced by the location of the development, such as the design of the housing and the incorporation of open space/green infrastructure within the new development, which are uncertain at this stage (as they will be determined through the detailed proposals for each site at the planning application stage).

Housing sites that are mainly or entirely on brownfield land are expected to have a negligible effect.

Rating system:

1 = Significant negative impact

Greenfield site adjacent to other housing.

2 = Minor negative impact

Brownfield site or re-purposed buildings adjacent to other housing.

Greenfield site not adjacent to other housing.

3 = Negligible negative impact

Brownfield site or re-purposed buildings distant from other housing.

Finding summary:

Significant negative impact

- BRHE_09 is a greenfield site adjacent to both the Conservation Area and the AONB.
- Building upon BRHE_09 would permanently obstruct the visual setting of Broadhembury village from the entrance lane from Colliton Cross.
- Building upon BRHE_09 would permanently damage the setting and vistas from a number of vantage points both within and outside of the AONB and Conservation Area.
- The consequential increase in vehicle movement brought about by building upon BRHE_09 would degrade the Conservation Area and AONB setting of Broadhembury village.

EDDC Factor:

Other constraints to development

EDDC Guidance:

Site specific constraints to development will need to be assessed and protected individually, with development free zones as appropriate. They will include matters such as

Topography- especially where part or all of a site is very steep

Tree Preservation Orders

Ancient woodland

Traditional orchards

High voltage powerlines

Communication masts

Major gas pipeline safety zones

Hazardous waste safety zones

Air quality (Air quality management areas)

Water quality

Marine Conservation Zones (parts of the rivers Axe and Otter)

Minerals Safeguarding

BNCLT Notes:

Traditional paddocks and ancient field types added to list

Rating system:

1 = Significant negative impact

Site in close proximity a listed aspect

2 = Minor negative impact

Site is adjacent to a listed aspect

3 = Negligible negative impact

Site is not, nor adjacent to, a listed aspect

Finding summary:

Significant negative impact

- BRHE_09 is adjacent to both the Conservation Area and the AONB.
- Building upon BRHE_09 would cause the intervisibility of a numbers of heritage assets – including grade 2, 2* and grade 1 listed buildings – to be adversely affected.

Appendix 2 – Additional BNCLT Site Selection Factors

Collected from parishioners and BNCLT members at the public meeting in Broadhembury Memorial Hall November 2021

BNCLT Factor:

Anticipated neighbourhood opposition.

Rating system:

1 = Significant negative impact

Site could reasonably be expected to draw significant opposition from immediate neighbourhood

2 = Minor negative impact

Site could be reasonably expected to draw some opposition from immediate neighbourhood

3 = Negligible negative impact

Site could reasonably be expected to draw no opposition from immediate neighbourhood

Finding summary:

Significant negative impact

- BRHE_09 was rejected by the local community in 2016. Broadhembury Parish Council (BPC) polled the local community, with a majority (60% of responses) rejecting the site.
- BNCLT have subsequently (2021) polled its members, again the majority (85% of responses) rejected BRHE_09 – even for affordable homes. The poll was analysed by post code. The 85% of respondents opposed to BRHE_09 were spread across the full parish of Broadhembury. Those postcodes from the village of Broadhembury were also opposed to BRHE_09.
- A summary of the reasons for rejection by the community in 2016 and 2021 is provided throughout this document.
- The method outlined in this document was used for 12 other potential sites (including, but not limited to, the HELAA sites)
- Each of the 12 potential sites were assessed against the 24 criteria detailed throughout this document – in the same manner as described herein for BRHE_09.
- BRHE_09 ranks 10th out of the 12 sites studied.
- Two of the “red” sites in the draft local plan rank worse than BRHE_09.
- One of the “red” sites ranks much better than BRHE_09.
- Details of the analysis for all sites has been provided to Middlemarch Community Led Housing (advisors to BNCLT). Middlemarch have reviewed and endorse our methods and conclusion. The analysis for the other sites, and the detail behind the summary herein, remains confidential between BNCLT and the landowners. Should EDDC require further insight into the analysis, please contact BNCLT Trustees at the address provided at the top of this report.

BNCLT Factor:

A Green Space: such as a Green Wedge (eg paddock or traditional field type within settlement) or a Green belt

Rating system:

1 = Significant negative impact

Site is in a Green Space

2 = Minor negative impact

Site is adjacent to a Green Space

3 = Negligible negative impact

Site is not in, or adjacent to, a Green Space

Finding summary:

Significant negative impact

- BRHE_09 is a green field site adjacent to the AONB, and the Conservation Area.

BNCLT Factor:

Ribbon development

Development of land along an existing road, and extending the perimeter of a settlement, that already has housing along that road. This is typical of, and therefore in keeping with, existing housing within the parish.

Rating system:

1 = Significant negative impact

Site would require access road construction

2 = Minor negative impact

Site is repurposed building that does not meet definition

3 = Negligible negative impact

Site meets definition

Finding summary:

Significant negative impact

- Broadhembury village is an excellent example of housing built in a “ribbon” manner with individual access to the existing rural lane network.
- The siting of 10 homes on BRHE_09 would require access road construction (a cul-de-sac or similar). Thus, it does not fit with the heritage characteristic design of Broadhembury village.
- Additionally, the access road would be sited at a bend of the existing lane from Colliton Cross to the village. Because of the bend, a significant visibility splay would be required. Such a design would not fit with the heritage characteristic design of Broadhembury village.

BNCLT Factor:

Infill development

Development of land along an existing road, but not extending the perimeter of a settlement, that already has housing along that road. This is not typical of, and therefore not in keeping with, existing housing within the parish.

Rating system:

1 = Significant negative impact

Site would occupy existing positive aspect such as traditional style field within settlement

2 = Minor negative impact

Site would occupy an existing aspect such as a low yield agricultural field

3 = Negligible negative impact

Site would occupy a brownfield site, or be a repurposed existing building

Finding summary:

Significant negative impact

- Building upon BRHE_09 would extend the existing built boundary of Broadhembury village.

BNCLT Factor:

Outside built-up boundary (all land in the parish is outside)

Rating system:

- 1 = Significant negative impact
Land is outside boundary
- 2 = Minor negative impact

- 3 = Negligible negative impact
Land is inside boundary

Finding summary:

Significant negative impact

- There are no Built-up Area Boundaries (BUAB) within Broadhembury parish. Hence all potential sites within the parish – including the village of Broadhembury – are outside of a BUAB.
- Note: The term BUAB and the term Settlement Boundary as used in the EDDC draft local plan have the same meaning.
- The EDDC draft local plan released for public consultation introduces a Settlement Boundary around Broadhembury village. That Settlement Boundary has been drafted to include BRHE_09.
- The inclusion of a settlement boundary would enable housing to be built upon BRHE_09 (or any other site within the boundary) without explicit community support.
- The inclusion of a settlement boundary within the EDDC draft local plan negates the principles of community support for housing.
- The inclusion of a settlement boundary within the EDDC draft local plan that is drawn around BRHE_09 – a site that explicitly does not have community support – completely negates the principles of local community support for housing.

BNCLT Factor:

Building re-purpose

Site would be a re-purposed existing dwelling or other structure

Rating system:

1 = Significant negative impact

Site would not be an existing building

2 = Minor negative impact

3 = Negligible negative impact

Site would be an existing building

Finding summary:

Significant negative impact

- BRHE_09 is a greenfield site. No existing buildings would be re-purposed.

BNCLT Factor:

On bus route

There are two bus routes serving the parish, both are infrequent (twice per day).

- One serves Honiton, Colliton Cross, Causeway End, Broadhembury Village.
- The other serves Honiton, Luton, Colliton Cross, Colliton, Dulford, Cullompton.

Rating system:

1 = Significant negative impact

Site is more than 600m from service route

2 = Minor negative impact

Site is between 100 and 600 m of service route

3 = Negligible negative impact

Site is within 100 m of service route

Finding summary:

Negligible negative impact

- BRHE_09 is on an existing bus route.
- That bus route connects with Honiton only.
- The service runs twice weekly
- A school bus service connects with Honiton community college on school days and at school times.
- It should be noted that the doctor surgeries that admit patients from Broadhembury parish are the practices in Cullompton and Dunkeswell (Blackdown Hills practice). There are no bus connections to Dunkeswell. Bus connections with Cullompton are not available from Broadhembury village – they are from other hamlets in the parish. It is unusual for the Honiton practice to admit patients from Broadhembury parish – if they do, they are classed as “out of area patients”.

BNCLT Factor:

Provides potential for improving ecology

That is, the potential for increasing – without removing existing - wildlife habitat, native tree species, or native plant species. The potential for adverse effects of existing ecology on adjacent land must be accounted for.

Rating system:

- 1 = Significant negative impact
Existing ecology would be reduced.
- 2 = Minor negative impact
Ecology would not be affected.
- 3 = Negligible negative impact
Ecology would be improved.

Finding summary:

Significant negative impact

- Building upon BRHE_09 would reduce existing ecology. Barbastelle bats (rare) are known to roost in disused buildings less than 30 m from BRHE_09.
- BRHE_09 itself contains a disused building that is highly likely to be a bat roost.

Response to EDDC Local Plan

12th January 2023

Broadhembury

Attachment 2

Contents:

Illustrations showing irreversible loss of vista and intervisibility at BRHE_09.

Map illustrating how BRHE_09, _05, _07 would contribute to increased flooding.

Maps showing the Conservation Area boundary appears to be moved without consultation.

Please take the entire contents of this attachment as a part of my rejection of site BRHE_09,
BRHE_05, and BRHE_07



View from entrance to Broadhembury village.
Grade 1 listed church in background.
Grade 2* listed buildings adjacent to church.
Site BRHE_09 is in the foreground.



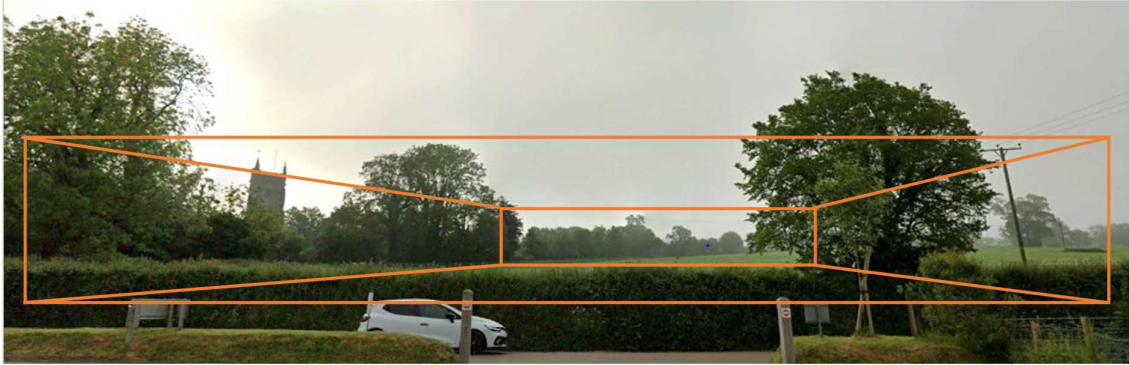
View from entrance to Broadhembury village.
Grade 1 listed church in background.
Grade 2* listed buildings adjacent to church.
Orange box shows footprint of BRHE_09.
Height of orange box is that of a typical house.



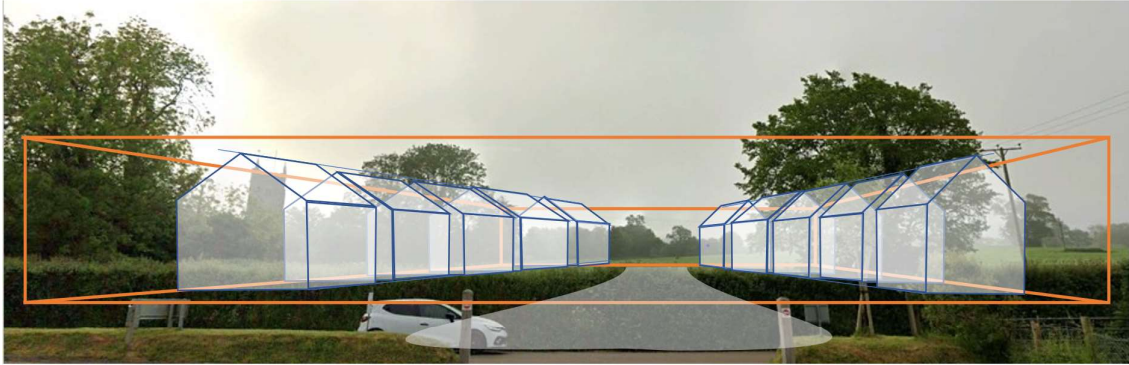
View from entrance to Broadhembury village.
Grade 1 listed church in background.
Grade 2* listed buildings adjacent to church.
An arrangement of housing on BRHE_09.
Heritage vista at entrance to village irreversibly lost.
Intervisibility with and from heritage asset irreversibly lost.



View at entrance to Broadhembury village.
Grade 1 listed church in background.
Grade 2* listed buildings adjacent to church.
Site BRHE_09 is in the foreground.



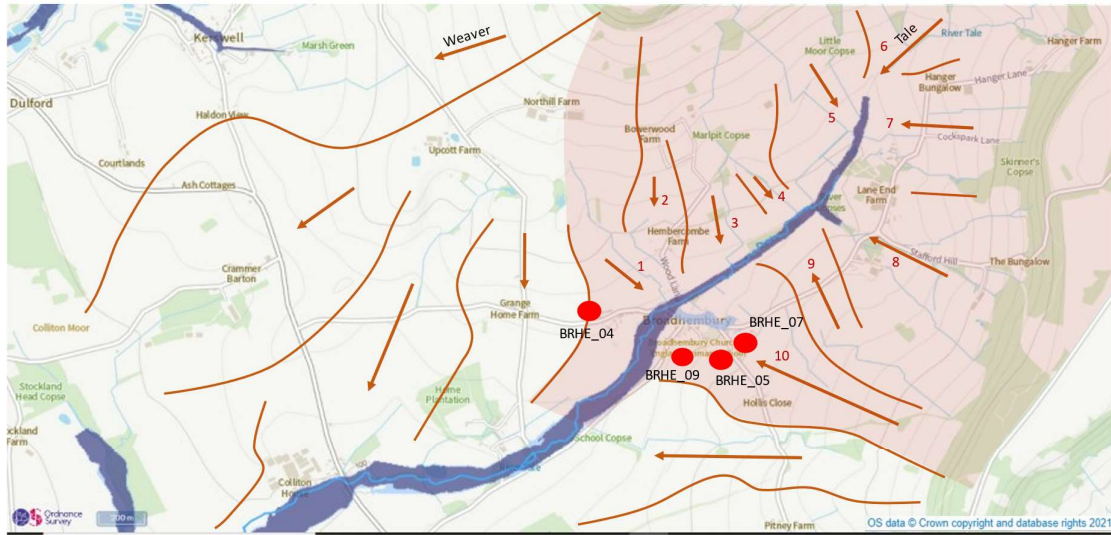
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View at entrance to Broadhembury village.
Grade 1 listed church in background.
Grade 2* listed buildings adjacent to church.
An arrangement of housing on BRHE_09.
Heritage vista at entrance to village irreversibly lost.
Intervisibility with and from heritage asset irreversibly lost.

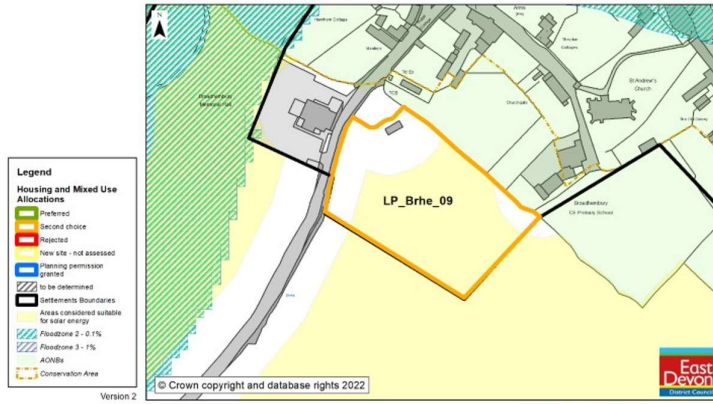
Broadhembury village flooding

[Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://flood-map-for-planning.service.gov.uk/)



Upper Tale Floodplain and Watershed

- Broadhembury village frequently floods – with homes frequently flooded.
- Flood risk zones shown in blue (see key).
- Red lines show ridge lines (constructed from contour lines). Red arrows show flow direction.
- Improvement of land permeability in areas feeding flood zones (pink shading) upstream of villages or hamlets should be encouraged.
- New building (which creates impermeable land) in areas that feed flood zones upstream of the village must be avoided.
- Red circles show sites BRHE_04, _05, _07, _09. All sites are inside the area of concern, although BRHE_04 is marginal.



Top left - Conservation area boundary in vicinity of BRHE_09 and School taken from EDDC draft local plan.

Bottom right – Conservation area boundary taken from 1999 EDDC document at broadhemca.pdf (eastdevon.gov.uk)

Note that the Conservation area boundary has been relocated – or proposed to be relocated - away from BRHE_09 and School.

Please reinstate original (1999) location of Conservation area boundary.

