

Broadhembury Parish Council, c/o Grange Lodge, BROADHEMBURY, EX14 3LJ

Dear Sir,

VILLAGES BUILT UP AREA BOUNDARY CONSULTATION

Broadhembury Parish Council welcomes the opportunity to comment on EDDC's proposals for the built-up area boundaries of East Devon. This response should be read in conjunction with our response to an earlier invitation to submit comments about the draft , which was submitted in March 2015.

Under the proposals contained in the document now open for consultation Broadhembury village will lose its built-up area boundary, and none of the other settlements which make up the parish of Broadhembury will be allocated development boundaries. This decision has been based on the application of 'sustainability' criteria outlined in the draft Local plan.

Broadhembury Parish Council wishes to retain the existing development boundary and over the life of our emerging Neighbourhood plan we wish to carry out work to redraw the boundary . Furthermore we wish to create small-scale sensitive developments of affordable/low cost housing in the other settlements subject to local consultation in order to ensure that we retain a sustainable community.

We base this view on evidence collected for our Neighbourhood plan and the consultations that have taken place. We also believe that people prefer to live in small communities with which they can identify and to which they can contribute.

We believe that the 'sustainability' argument that you have deployed to support your intentions is specious. The village of Broadhembury already has a shop and Post Office, a school judged to be outstanding, a church, a pub and a new Memorial Hall (community centre) as well as a children's play area. There is an intermittent bus service. This range of community services is apparently inadequate because of the absence of a Doctor's surgery, which is the one remaining criterion in your list of sustainability criteria. This criterion effectively rules out any habitation with a population of less than 5000 residents.

A village is not sustainable without some development, and the provision of services is not economic without residents, so the application of these criteria effectively condemns Broadhembury and many other communities to atrophy slowly. As we lose

facilities due to lack of growth, residents will have to travel further to access needs and the village becomes even less sustainable. We also lose any benefit from tourist trade. Furthermore, in National Planning Policy Guidelines there is a presumption in favour of thriving rural communities. Your draft Local Plan which condemns the Parish to be classed as 'open countryside' (and thus ineligible for any housing except in a few highly technical exceptions) is contrary to this guideline because we cannot 'thrive' without services and services need growth. It also contradicts the Government's desire for rural productivity and its support for rural housing.

We do not believe that your criteria, with which we strongly disagree, have been applied consistently in your plan. For example we are not aware that Dunkeswell, where you intend to draw a new Development boundary, has a school. The resultant new building in Dunkeswell will eventually lead to a local school and the closure of Broadhembury Primary School with the consequential waste of resources.

In conclusion, and to re-iterate our earlier comments, we wish to proceed with the identified SHLAA development in Broadhembury village, identified in our Neighbourhood plan. This development will have an element of 'affordable/low-cost' housing, which is supported by the evidence of recent surveys. This will at least guarantee the provision of some affordable/low cost housing. Additionally, and during the life of our emerging Neighbourhood plan we will carry out work to identify sites for development in neighbouring hamlets, which comprise the Parish.

Although East Devon comprises some former market towns, and small seaports, rural villages and hamlets are very significant. This is the pattern of habitation, which gives East Devon its distinctive character. Your plan condemns small rural communities to a slow slide into ghost dormitory hamlets with the inability to house young people or retain older people in the community because of the declining provision of services.

Broadhembury Parish Council does not believe that the logical outcome of your plan serves the needs of local people for a sense of place and social cohesion and we would ask you to reconsider it.

Yours faithfully,,

Broadhembury Parish Council

Replies should be addressed to The Clerk .