

Dear Edward,

Many thanks for your note on the potential procedural issue relating to the Broadway Neighbourhood Plan and for allowing the Parish Council and District Council to provide a response; please find this email as the combined response of the Parish Council and District Council.

Point 1, Question to the District Council

I understand that the District Council is satisfied that the Regulation 14 consultation itself was completed appropriately and aligns with the Regulations. Is this presumption correct?

District Council response: Wychavon District Council can confirm that, to the best of its knowledge, it considers the Broadway Neighbourhood Plan Regulation 14 consultation was conducted in line with the Neighbourhood Plan Regulations.

Point 2, Questions to the Parish Council

First, can the Parish Council confirm that it did not consult Turley as part of the Regulation 14 consultation on the Neighbourhood Plan? Can the Parish Council also confirm that it did receive a duly made submission from Turley within the Regulation consultation period?

Parish Council response: The Regulation 14 consultation, which commenced on 4 September 2020 and ended on 16 October 2020, was a general public consultation on the draft Neighbourhood Plan and was advertised by way of press notice, public notices, website articles and posters and banners displayed locally in and around the village. No specific targeted or personalised consultation was undertaken other than with registered owners of proposed Local Green Spaces, sports organisations and two local bodies, in accordance with the NPPG. The Parish Council received a representation from Turley on behalf of Amber Retirement Living on 16 October 2020 (see attached as requested).

Secondly, can the Parish Council confirm that the main issues and concerns that were raised by Turley at the Regulation 14 stage were considered by the Parish Council? The Parish Council should set out the issues raised by Turley and direct me to their consideration in the Consultation Statement, and where relevant how they have been addressed. As I have said, I do not have access to Turley's Regulation 14 submission to address this point directly. It would be helpful for that to be submitted in response to this request.

Parish Council response: The main issue raised by Turley, i.e. the promotion of land at Cheltenham Road, Broadway for allocation in the Neighbourhood Plan, was previously communicated to the Parish Council outside of the Neighbourhood Plan process. The Parish Council were fully aware of this aspiration when forming the Regulation 14 and 16 versions of the Neighbourhood Plan. However, the Parish Council regrets that the Turley letter dated 16 October 2020 was omitted from the Consultation Statement in error and the Parish Council has written to Turley to highlight this and to apologise for this oversight (copy attached). The Parish Council has subsequently prepared an addendum to the Consultation Statement which details with the Turley submission and this has been provided to the District Council (copy attached). The Parish Council is firmly of the view that, despite the Turley letter being omitted from the Consultation Statement, Amber Retirement Living has not been prejudiced in any way and this oversight would not have altered the decision not to allocate the site at Cheltenham Road, Broadway.

The Parish Council and District Council hope this information is of use; please do not hesitate to contact us if there are any further queries on this matter.

Regards,

Reiss

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16 October 2020
Delivered by email

Broadway Parish Council
broadway.parish.council@unicombox.co.uk



Dear Sir/Madam,

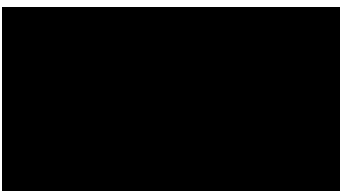
REPRESENTATION TO THE BROADWAY NEIGHBOURHOOD PLAN (2006-2030) PRE-SUBMISSION DOCUMENT

This response to the consultation on the Broadway Neighbourhood Plan Pre-submission Version Document ["BNP Pre-submission"] is submitted by Turley on behalf of Amber Retirement Living Limited ["Amber"]. This response makes specific representations in respect of future housing, pedestrian access/transport, design, and landscape and community matters with particular relevance to Amber's land interests at Cheltenham Road, Broadway (shown on the site location plan at **Appendix 1**).

AMBER RETIREMENT LIVING LIMITED

Amber Retirement Living Limited focuses specifically on Amber Infrastructure Group's investment in Assisted Living and Extra Care development. Through its work, Amber is seeking to provide solutions to the matters associated with ageing in the region, whilst enhancing the lives of residents and the local community. Amber believe the assisted living model can meet a range of needs and objectives for the area. This includes providing a range of accommodation types and allowing 'ageing in place' by ensuring people have access to all the facilities and levels of care required. It includes an active community which seeks to overcome loneliness and isolation. It removes the need for residents to move again.

Amber also seek to promote community and intergenerational links through their model and design approach. This seeks to encourage engagement with existing residents and across all ages in safe environments. This has benefits for all involved. The above approach is of increasing importance in the context of the COVID-19 pandemic, whereby promoting independent living and sustainable communities is ever more vital to people's health and wellbeing.



LAND AT CHELTENHAM ROAD, BROADWAY

Amber's land interest is outlined in red in **Appendix 1**. The site is located to the south west of Broadway and to the north of Cheltenham Road. The 1.9ha site is not subject to any environmental designations. It is situated outside of the Broadway Conservation Area and Area of Outstanding Natural Beauty (AONB).

The site is subject to an existing live planning application for an Assisted Living development (Use Class C2) (application ref. 20/01565/FUL). The full description of development comprises:

"Demolition of outbuilding and construction of a new assisted living (Use Class C2) development comprising bungalows and apartments, communal facilities, hard and soft landscaping, parking, new access and bus stop provision and associated works."

Detailed pre-application discussions and consultation with local stakeholders and residents was undertaken in advance of this planning application. The scheme has been carefully designed to respond to the setting, context and objectively assessed needs of Broadway (and Wychavon as a whole) in the later living sector.

We set out below responses to the BNP Pre-submission Version and associated evidence base. The representations aim to contribute to the scope and content of the Neighbourhood Plan, notably on the policy approach to housing, design, transport, landscape and community. We have responded to the proposed policy approaches considered relevant to the client's proposal at Cheltenham Road, Broadway. It is evident that the scheme will provide much-needed, high quality assisted living facilities for residents.

DEVELOPMENT BOUNDARY AND HOUSING MATTERS

Policy HD.1 focuses on the development boundary and infill proposals. HD1.2 states that all areas outside the development boundary are classed as countryside. Development in these areas should be limited to rural worker dwellings, replacement dwellings, re-use of existing buildings, construction of houses with exceptional design and new dwellings according with the proposed Rural Exception Policy.

The proposed policy wording is not consistent with the overarching position set out in the South Worcestershire Development Plan (SWDP)¹. The SWDP states that other forms of development (beyond simply Use Class C3 housing) may be acceptable outside of the development boundary where permitted by other SWDP policies. This allows proposals such as for Use Class C2 development to come forward in such locations whereby specific policy criteria are achieved².

This policy approach is proposed to be carried forward in the SWDP Review (SWDPR). Whilst Neighbourhood Plans are not obliged to contain policies addressing all forms of development, it is important that policies are not contrary to, or inconsistent with local planning policy. Given the nature of Broadway's population, the objectively assessed need for³, and relevance of Use Class C2 developments in Broadway, this should be reflected in any forthcoming Neighbourhood Plan proposals.

¹ See Adopted Policy SWDP 2 and Footnote 4 of [South Worcestershire Development Plan \(2016\)](#)

² See Adopted Policy SWDP 20 and SWDPR 22.

³ See Worcestershire Extra Care Housing Strategy and Turley Needs Assessment submitted under 20/01565/FUL.

Housing Need

A Housing Needs Survey and Analysis (November 2017) has been undertaken to support the BNP Pre-submission policies. The results identify a clear need for bungalows in Broadway and this is identified within paragraph 5.1.3 of the BNP Pre-submission which states:

“One consequence of the housing pressure and the numbers of older residents is a shortage of affordable homes for local people and of smaller homes (eg bungalows) for older residents wishing to down-size...”

The supporting commentary then goes on to recognise that such need may have an impact on local infrastructure and services, including health and social care.

The current drafting of the BNP Pre-submission policies contradicts this evidence and precludes such necessary and important development from coming forward in the village. Greater recognition and support should be given in the Neighbourhood Plan to development required for older residents wishing to downsize. This includes high quality assisted living / extra care (Use Class C2) developments of exceptional design.

The substantial community benefits for Broadway and its identified needs from such developments can include:

- Smaller homes such as bungalows to facilitate downsizing and free-up larger homes.
- Support for independent living whilst providing access to ranging levels of care, alleviating pressure on NHS services in the area. This safe and sustainable community environment is extremely important in light of the constraints faced by COVID-19.
- Support wider infrastructure improvements through on-site and off-site improvements and financial contributions.

The draft Neighbourhood Plan policy evidence base on housing need corresponds closely with the objectively assessed need for later living accommodation in Wychavon. Amber has instructed an updated needs assessment as part of its application, which draws the same conclusion. There is an important opportunity for the BNP to be positively prepared in meeting this need by providing for such appropriate development in the plan area of Broadway.

DESIGN AND LANDSCAPE

The BNP Pre-submission Version sets out a range of proposed policies to address the sensitive design and landscape context of Broadway. We support the pragmatic approach taken to conserving and, where appropriate, enhancing the landscape character in draft Policy NE.2 (Valued Landscapes, Vistas and Skylines) and Policy NE.10 (Tranquility and Dark Skies).

These policies are intrinsically linked to Policy BE.1, which sets out the Design Principles for development with reference to respecting the local settlement pattern, building styles and materials discussed in the Village Design Statement. Whilst our client is supportive of the policy and context surrounding this, design policy should also recognise that providing a high quality design comes directly from the development itself, as well as its context. Policy should seek to promote high quality design and facilitate appropriate development in sustainable locations. This is recognised within the adopted SWDP Policy 21, which refers to expecting development to be of a high design quality within itself.

Broadway is recognised in the SWDP as a Category 1 village. It has a good range of services and facilities and some access to public transport. Such villages have a role in meeting locally identified housing and

employment needs. The settlement is a wholly appropriate location for high quality development to meet the demonstrable need for assisted living.

Where Policy BE.1 requires new development to be compatible with the local character and respect the settlement pattern, it is important to note that compatibility, respect and maintaining should not preclude high quality design. The BNP Pre-submission recognises that Cheltenham Road has developed over a number of decades to include a variety of styles which are unified by materials, trees and scale. The Village Design Statement also identified that the settlement pattern is nucleated but with an east to west linear character along a number of streets. This reflects the original linear pattern of the settlement, which has become more nucleated over time. The predominance of the High Street and ribbons of development along main routes into the settlement illustrate this pattern.

Developments can have their own identity whilst still complementing and reflecting the local character and context. Broadway can evolve through high quality development in a manner that is consistent with its history and overriding characteristics. This is identified in the adopted SWDP and emerging SWDPR, where policies support new, high quality development that is innovative and where they also enhance the overall built environment. This approach should be clearly considered and positively replicated in the Neighbourhood Plan policy to avoid any conflict with local planning policy.

PEDESTRIAN ACCESS AND SUSTAINABLE TRANSPORT

A number of concerns are raised in the BNP Pre-submission Version on pedestrian access and highway safety. The supporting text within the BNP Pre-submission Version identifies a number of traffic and highway constraints in the village. Of particular note is concern over speeding on Cheltenham Road, which is referenced as having been a problem for years and a concern in both directions (page 124). This concern is reflected in the proposed policy wording.

Policy HD.8 seeks for new housing to be designed to ensure it connects safely to the village's amenities and existing pavement network within the village of Broadway.

Our client is supportive of this policy and the importance of pedestrian permeability and safety. To be as effective as possible, Policy HD.8 should be applicable to all forms of new development (not simply new housing). This will be of growing importance in supporting safe travel and movement during and following the COVID-19 pandemic.

Policy COM.2 requires new developments to demonstrate how walking and cycling have been prioritised and connections made to existing routes. Those adversely affecting existing walking and cycling routes or which do not encourage such will not be supported. The aim of the policy is supported. However, further policy consideration is required as to how highway improvements and mitigation measures can play a role in pedestrian safety in Broadway as a whole. In addition to measures to directly improve pedestrian access, traffic and highway improvements are also an effective way of facilitating the sustainable movement within and growth of existing communities.

The NP undertaking a settlement wide review of traffic is supported. This could be expanded to wider access and highway improvements as a means of promoting sustainable movement by alternative modes of transport. Appropriate new development is likely to be an integral element in delivering such an aspiration.

This is recognised in Amber's proposed scheme, which provides for an extension to the existing pavement network along Cheltenham Road, new bus infrastructure and traffic calming. The aim of this provision is to encourage and promote safe pedestrian access into the settlement of Broadway. New

footway, footway widening and informal pedestrian crossings are proposed to enhance the safety and desirability of pedestrian routes into the town centre.

This provision demonstrates how design improvements can be incorporated into new development to benefit the wider community. This will allow for future residents to safely access amenities. It will ensure safe access into the site for the wider community when community or intergenerational events are held at the site. The provision will promote alternative and sustainable active travel.

Amber's proposals at Cheltenham Road, Broadway include for:

- Pedestrian footway improvements, as identified above.
- Additional bus stops along Cheltenham Road, including shelters and seating, to be served by the 606 Service.
- Traffic calming to reduce speeds entering into Broadway.

The above improvements represent an integral part of the process in promoting sustainable transport options and safety at this gateway into Broadway. It is our view that such methods should be recognised in policy as contributing to an environment where walking, cycling and public transport are encouraged.

The above demonstrates the overall public benefits that appropriate growth in the right direction can achieve. These benefits can support the aspirations for a sustainable settlement and its community. They accord with the priorities and objectives of the Neighbourhood Plan. Supporting these objectives and safe movement is of increasing importance in light of the current health pandemic.

COMMUNITY ASSETS

Our client supports the approach to enhancing and improving community assets, as well as providing new community assets set out within Policy COM.1. Figure 36 recognises a range of existing community assets, including sports clubs, churches, schools, retail, and parks.

It is also important to note that community assets can be provided through community uses facilitated on private developments, such as opportunities for intergenerational events that utilise communal space within assisted living developments.

These spaces can bring important community value for existing and future residents of all ages, including reducing isolation and loneliness. Amber's proposals seek to encourage and incorporate intergenerational events between local stakeholders (such as schools) and future residents.

SUMMARY AND CONCLUSION

The foregoing analysis demonstrates that some amendments and further considerations are required to the identified BNP Pre-submission policies to ensure they are appropriate and in accordance with local planning policy and the demonstrable accommodation needs of Broadway.

The proposed development at Cheltenham Road, Broadway is an opportunity to provide high quality development which will address a wide range of policy needs and objectives for the neighbourhood. We would be pleased to discuss the site and relevant policy wording further with Broadway Parish Council as part of any future consultations.

We trust this response is of use and look forward to participating in future stages of the Neighbourhood Plan. In the meantime, please contact us with any queries.

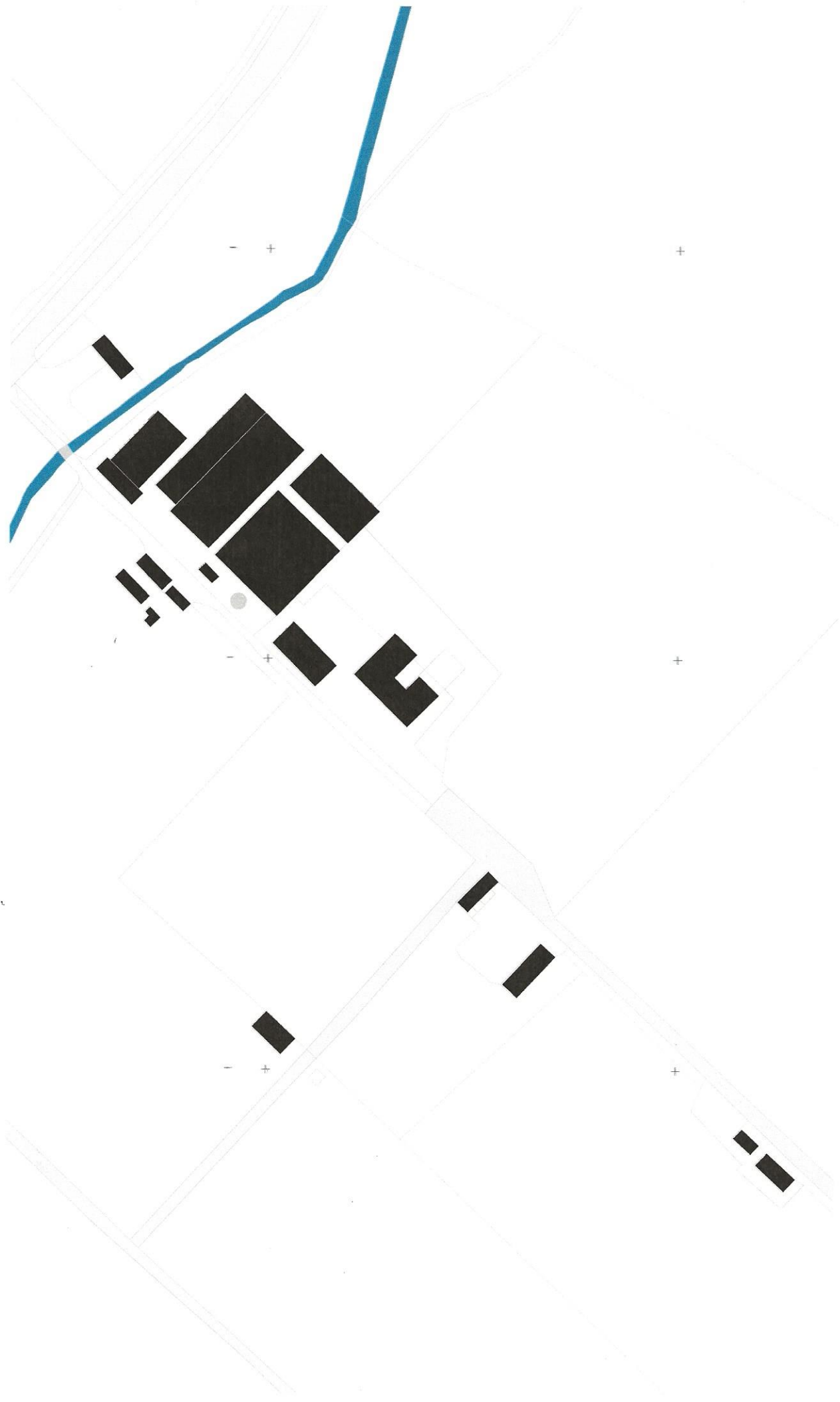
Yours sincerely



Jadine Havill
Senior Planner



Appendix 1: Site Location Plan



[REDACTED]

[REDACTED]

[REDACTED]

Dear Laura,

Further to our telephone conversation regarding the Broadway NDP, I confirm that the comments submitted on behalf of your client, Amber Retirement Living Limited, were received as part of the Regulation 14 process.

However, there was a clerical error and the comments were not included in the Consultation Statement appendices. This was not intentional and I do apologise for this oversight.

As you are aware the Parish Council has objected to the current planning application (20/01565/FUL) for the site in question. For the reasons set out in these objections, the site was not deemed to be appropriate in the emerging NDP.

The site was also assessed by Wychavon District Council under the SHELA process and the independent Strategic Environmental Assessment (SEA) carried out by Lepus Consulting

I can assure you that the Parish Council and the Neighbourhood Plan Steering Group were very aware of your clients aspirations to develop the site off Cheltenham Road whilst preparing the NDP. Consequently your clients interests have clearly not been prejudiced by this oversight. Your clients submissions to Wychavon District Council under Regulation 16 will be considered by the Independent Examiner in due course.

Unfortunately, your clients proposals, like many other speculative requests for allocation of land for development, was not supported by the NDP process.

Again, please accept my apologies for any misunderstanding this may have caused.

Yours sincerely

Gordon Franks

[REDACTED]

SUMMARY	RESPONSE
Amber Retirement Living propose need for assisted living, extra care development and the promotion of community and intergenerational links.	See below
Claim to provide much needed, high quality assisted living facilities for residents	outside the development boundary
Propose to build outside the development boundary.	See below
	NDP does not support new building outside the Development boundary
Policy HD1 Wording not consistent with overarching position set out in SWDP	There is no obligation to allocate housing on the NDP. We are aware of a number of land owners who wish to develop land in the NDP area..Based on local evidence there is no need to allocate more land than is allocated in the NDP. The QB, in consultation with Wychavon District Council, believe that the proposed allocations in the SWDP and NDP meet current needs.
Housing Needs Survey identified a shortage of affordable homes for local people and smaller homes (bungalows) for older residents to downsize.	Housing needs survey, shows needs met by proposed Allocations. Downsizing by older people will not meet housing need of young residents with families.
Design and Landscape policies NE2, NE10, BE1 supported	Noted
Pedestrian access Policy HD8 supported	Noted

New developments to demonstrate how walking and cycling have been prioritised Policy COM 2 supported	Noted
Policy COM 1 Community assets, support and improve community assets/facilities supported	Noted