

Broadway Submitted Neighbourhood Plan Consultation

RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Broadway Parish Council has submitted its Neighbourhood Plan to Wychavon District Council. In accordance with Regulation 16, Wychavon District Council would like to invite comments from individuals and organisations on the submitted Neighbourhood Plan.

This consultation runs from Friday 23 July to 5pm on Friday 3 September 2021.

All comments will be made publicly available and identifiable by name and organisation (where applicable). The personal information you provide on this form will be held and processed in accordance with the requirements of Data Protection Legislation. More information on how we will hold your data can be found at:

<https://www.wychavon.gov.uk/privacy-policy>

Please fill in your details in the boxes below:

Full Name: Kay Hughes

Organisation (if applicable): Herefordshire and Worcestershire Earth Heritage Trust

Address (including postcode):

████████████████████
██████████████████
██████████
██████

Telephone number: ██████████

Email address: ██████████

Please state which part of the Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Section 5.3 Natural Environment, specifically

Policy NE.6: Protect and Enhance Biodiversity and the Natural Environment

Please use the space below to make comments on this part of the Neighbourhood Plan.

It is disappointing that none of the detail contained in our previous comments has been included in this version of the plan. Although it is good to see that the geological interest of the Broadway area is now recognised in general, we note in particular that the two Local Geological Sites are not named specifically or included on any of the maps. Since NPPF calls explicitly for planning policy to protect sites of geological interest, including locally designated sites (see paras 170, 171), we think this omission should be rectified.

The Broadway Cambered Gulls Local Geological Site is of particular concern. The local geological interest of this site is in the unusual landforms, known as Cambered Gulls, formed as the Cotswolds escarpment was breaking up due to major freeze and thaw effects of the last ice age. They are particularly well shown in this area and can be viewed from Broadway Tower, making them very valuable for educational purposes. The site is part of the Broadway Hill SSSI, which is designated for its grassland biology but not for its geology. This geomorphological interest needs to be recognised independently, as it could easily be disturbed or concealed by inappropriate land management. (Note that it is not clear from the plan whether or not this part of the SSSI is managed by the Worcestershire Wildlife Trust as part of their Hills Meadows and Happyland Quarry reserve.)

The Broadway Quarry Local Geological Site is also designated as a Local Wildlife Site and receives much mention in the Plan for that reason. The site cuts through several Jurassic rock formations, and the potential remains to expose them for scientific and/or educational purposes.

We strongly recommend that the Local Geological Sites are mentioned in the plan, so that their geological value is recognised in any future land management decisions and to comply with NPPF. In the absence of a specific map showing the locations of these sites, their locations should be indicated with reference to the corresponding wildlife designations, for example:

The Happylands Quarry Local Wildlife Site is also designated as a Local Geological Site, as several different Jurassic rock formations are represented within it.

The upper part of the Broadway Hill SSSI is also designated as the Broadway Cambered Gulls Local Geological Site. The landforms show the presence of "cambered gulls", unusual geological features that can readily be viewed from Broadway Tower. Any land management in this area should ensure that the landforms are undisturbed.

Please use a separate form for each representation.

Please state whether you would like to be notified of the Council's decision on the Neighbourhood Plan proposal:

Yes

 Y

No

Please email this form to policy.plans@wychavon.gov.uk or post it to Planning Policy, Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, WR10 1PT.