

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: Constance A. McGovern & Stephen Previs

Organisation (if applicable): Kennel Lane Objection Group

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):

We vehemently object to the BNP for the Church Close/Church Mews road cut through to adjoin with Kennel Lane and the destruction of the associated greenfield site

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

[../Documents/KLOG Submission.pdf](#)

[Connie KLOG SubmissionOct 14 PM.pdf](#)

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

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.

Kennel Lane Objection Group

Comments on the Pre-Submission Consultation Draft of the Broadway Neighbourhood Plan published on 4 September 2020 by the Broadway Parish Council

Introduction

The Kennel Lane Objection Group (KLOG) has been formed to draw attention to what KLOG sees as unacceptable proposals contained in the draft Broadway Neighbourhood Plan (draft BNP). KLOG consists of residents of Broadway who strongly oppose these proposals. KLOG welcomes the fact that there is a public consultation and that the Parish Council has encouraged residents to “have their say” on the draft BNP. Contact details for KLOG are set out at the end of this memorandum.

Proposed Policy HD.4: Site Allocation – Land off Kennel Lane/Church Close (pages 30 to 33 of the draft BNP)

Objection 1 – no traffic access from Church Close

KLOG objects to the proposal to allow a road breakthrough from Church Close to the land off Kennel Lane (Policy HD4.2(a)). The development proposals in Policy HD.4 are all based on this breakthrough happening. The draft BNP fails to mention the traffic consequences of this proposal. It contains no analysis of the traffic consequences. This point appears to have been missed and should be addressed in a new draft of the BNP.

Community Projects 6 and 7 in Policy COM 1 (“Traffic” and “Report on Traffic” respectively: see pages 123 to 126) make no reference to Policy HD4.2(a), to Kennel Lane or to Church Close. If changes are to be evaluated for other roads in the village as per CP 6 and 7, why is Church Close not being given the same consideration? The traffic consequences of HD4.2(a) are considerable and permanent. A different solution needs to be found.

Objection 2 – no expansion of the Church Close car park

KLOG objects to the proposal to extend the existing Church Close public car park with approximately 50 additional spaces (Policy HD4.2(c)). In common with the road breakthrough proposal addressed in Objection 1, there is no mention or analysis of the traffic consequences of this proposal. According to the Wychavon District Council website the existing car park has 146 spaces. The draft BNP contains no justification for expanding the existing car park.

Policy HD4.2(c) is also utterly inconsistent with the parking focused Community Projects 4 and 5 in Policy COM 1 (see pages 120 to 125). CP 5 describes “A Full Survey of Parking in the Village” to be done in due course to assess car parking needs. Paragraph 5.5.21 on page 122 states that “It would be inadvisable to create

more parking near the village centre, which could be unsightly and create a perverse incentive for more car journeys.”

Why does Policy HD4.2(c) prejudge the outcome of CP 5?

How is HD4.2(c) to be reconciled with the view that the Parish Council has formed in Paragraph 5.5.21 as to the undesirability, on both aesthetic and environmental grounds, of “more parking near the village centre”?

Objection 3 – destruction of green space

Both the road breakthrough and the public car park expansion would result in the complete removal of an extensive and valued green space between the existing Church Close built environment and the Kennel Lane retail and car parking area. HD.4 pays no attention to this reality, failing to address it other than to wrongly claim that the area is brownfield – in the context of this extensive green space that label is absurd and should be withdrawn from the draft BNP. References elsewhere in the draft BNP to the value of green space look like lip service in this instance.

Paragraph 5.1.2 on page 18 refers to the Green Wedge. The green space wrongly described as brownfield in HD.4 is as much a part of the Green Wedge as any other part of the land identified as (to quote from 5.1.2): “areas of open green infrastructure which collectively form a Green Wedge” and are “much valued by residents and visitors alike” as they “play an important role in conserving the village’s rural ambience.” The green space in HD.4 should be accorded the same respect as other open green infrastructure, given that (to quote again from 5.1.2): “Protection of this wedge is also considered vital in maintaining the existing linear pattern of the village’s built-up areas and preventing merging of housing concentrations.”

The road breakthrough from Kennel Lane to Church Close, taken together with the destruction of the HD.4 green space to provide more public car parking, would create a merger of housing/building concentration - with a related parking concentration - on a scale that would be completely out of proportion to the existing linear pattern of the village’s built-up areas. It would do irreparable damage to what remains of the linear pattern of Broadway’s historic core.

Respected correctly, this green space will provide biodiversity and a valuable space close to the centre of the village for flora and fauna for centuries to come. The case for a nature reserve needs to be seriously considered. Nature reserves have been established in, for example, Lifford Gardens and the Sands. This green space needs similar protection.

Objection 4 – too much new traffic each day for Church Close and Church Street

A conservative estimate of the additional traffic movements each day for Church Close and Church Street is 350 additional journeys by cars, lorries and motorbikes forever. This calculation is based on (i) current parking practices in the vicinity of Kennel Lane and the Hunt premises and (ii) the additional 50 parking spaces proposed for the Church Close public car park. There are also the additional construction traffic movements over several years that would be necessitated by the

redevelopment of the land off Kennel Lane, the Hunt premises and the expansion of the public car park.

Objection 5 – existing traffic problems will be made worse

Both Church Close and Church Street suffer from speeding and parking problems, notwithstanding the 30 mph limit and double yellow lines. The frontage of properties on Church Close is very near to the road. The road itself is narrow. Noise and pollution levels are already an issue, and would be aggravated severely by the proposed increase of volume in traffic. Residents of Church Close already have to close windows to shut out the traffic noise and exhaust pollution when there is traffic congestion.

The junction of Church Close with Church Street is too narrow to cope with existing traffic. Two cars are frequently unable simultaneously to enter and leave Church Close. The position with vans and lorries is worse. The junction is further stressed by lorries, vans and some cars using it to make three point turns to return to the High Street/Station Road. Articulated lorries have a particular challenge undertaking such three point turns. Banning these three point turns would be counter-productive as there is nowhere else further along Snowhill Road for such manoeuvres to be performed.

The current configuration of Church Close allows for pedestrians to cross the road in relative safety when moving to and from the car park. The road breakthrough (Objection 1) would change this, turning this section of Church Close into a thoroughfare rather than a cul-de-sac. With pedestrian movements between 600 and 1,000 on many days, pedestrian safety will be compromised. Installing a controlled crossing would be largely ineffective because the road is narrow enough to tempt people to cross without waiting.

KLOG supporters have said that they have to calculate travel times from their off-street parking to allow for the difficulty of getting on to Church Close at busy times and for negotiating the junction of Church Close and Church Street. Taxis called to houses in Church Close are delayed at busy times, causing residents to miss appointments and train departures. The congestion is such that there are concerns about emergency vehicles reaching call-out destinations as quickly as we all would wish.

Church Street is the route of the Cotswold Way, a National Trail. The pedestrian traffic across the junction of Church Close and Church Street is a material consideration, which is not considered in the draft BNP. In fact, the draft BNP appears to have a map of Broadway's Public Rights of Way (page 128), which fails to show the route of the Cotswold Way along Church Street. Church Street is also a popular route for cyclists and horse riders, in both directions.

Adding the demands of the traffic contemplated by Policy HD.4 to the current load will result in too many conflicting, and ultimately incompatible, uses of Church Street and Church Close. There is no recognition of these realities in the draft BNP.

The congestion suffered today will be compounded by Policy HD.4. Broadway's enduring appeal for visitors will be damaged by increased traffic congestion. As

framed in the draft BNP, Policy HD.4 will result in Broadway's tourist image being permanently altered for the worse.

Observation 1 – the GWSR car park on Station Road

This car park is barely used at present. It should be utilised for Broadway's first Park and Ride facility. There is no justification for expanding the Church Close car park when other car parks sit empty.

Observation 2 – changes to the access regime for the Church Close car park

Instead of expanding the Church Close car park, there is a strong case for enhancing long stay car park provision and encouraging visitors to walk or cycle into the centre of Broadway. The Church Close car park could be reserved for use by blue badge holders and the drivers of electric vehicles. The car park might even be reduced in size.

The length of stay and pricing regimes for Broadway's council car parks should be re-examined. Why not consider higher prices for shorter stays in the Church Close car park and offer better value for the longer stay car parks?

Observation 3 – the parallel with Back Lane

It is widely recognised that Back Lane has serious traffic problems. Church Close has serious traffic problems already too. Do not compound those problems by allowing the planning process to be used to squeeze the last drop of property development out of the core of Broadway's historic central area. The Parish Council should aspire to better solutions.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Comments on the Pre-Submission Consultation Draft of the Broadway Neighbourhood Plan of 4 September, 2020 by the Broadway Parish Council.

I applaud the Broadway parish council's efforts over the years to foster Broadway's original and unique features and preserve its history. As a 16 year on a resident in Broadway, however, I strongly object to the Kennel Lane/Church Close plan (HD.4). I am supporting the Kennel Lane Objection Group (KLOG). My concerns are interlinked and, it has to be noted, the proposal *down to the letter* is in direct contradiction to the pre-submission plan's vision for A GREEN AND HARMONIOUS NEIGHBOURHOOD.

The proposed changes to Kennel Lane/Church Close are

- Bad for the health and well-being of the taxpayer and residents in this area of Broadway
- Bad for the environment, flora and fauna (NE.1-4)
- Bad for protecting the character of the village
- Bad for maintaining tranquility (ie, car alarms, horn honking, loud music/radios, motorcycle and engine revving.)
- Defies the established trend of retail's move online (several shops have closed recently)
- Defies the tourist's expectation for an authentic experience of this historic village
- Ignores the real potential for economic downturns due to Covid knock on effects
- Creates huge potential for rat runs and congestion during business hours, speeding at night and early morning (already an issue)
- Blind to the slippery slope leading to demise of our village, its charm and unique selling position, endangering the very reason tourists visit Broadway and support our economy.

Noise pollution (10.5, 5.3.85), air pollution, the character of the village (HD.1.3), safety, and protection of the environment, are all negatively affected by this proposal. Acceptance further encourages more withering away of that which makes Broadway the jewel of the Cotswolds.

Let's not have the taxpaying residents and homeowners bear the brunt of such a development. Let's prevent that. There is currently a proportionate balance of shops to people, there is already an underused car park available for visitors. Some might say, *it's just a little walk path; pave it*, and *it's just a bit of unused soil and shrub; pave it*. But who benefits and who must day-to-day deal with the consequences? Please don't let the many tax paying homeowners and residents lose their quality of life, financial wellbeing (due to a drop in house prices), and physical and mental health in a trade off for the financial benefit of a few.

Regards,

Connie McGovern

