

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: Ms Jadine Havill

Organisation (if applicable): Turley (on behalf of Amber Retirement Living Limited)

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):

Policy Ref HD.1, NE.2, NE.10, BE.1, HD.8, COM.2, COM.1.

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

Please refer to accompany covering letter which sets out representations in relation to the aforementioned policies and the Neighbourhood Plan Submission Version.

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.

3 September 2021

Delivered by email (policy.plans@wychavon.gov.uk)

Wychavon District Council
Civic Centre
Queen Elizabeth Drive
Persore
WR10 1PT

Dear Sir/Madam,

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

This response to the consultation on the Broadway Neighbourhood Plan Submission Version Document ["BNP 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**).

Given the omission of any reference to Amber's previous representation in the Consultation Statement prepared for the BNP Submission, this response also seeks to clarify whether our previous response has been acknowledged in accordance with Regulation 15 of the Neighbourhood Planning Regulations 2012 (as amended).

THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)

Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) sets out the requirements where a qualifying body submits a plan proposal including under 15 (1) (b) a consultation statement. Regulation 15 (2) sets out that in this regulation "consultation statement" means a document which includes the following:

- a) Contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan [or neighbourhood development plan as proposed to be modified.];*
- b) Explains how they were consulted;*
- c) Summarises the main issues and concerns raised by the persons consulted; and*

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- d) *Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan [or neighbourhood development plan as proposed to be modified.]*

The BNP Submission is supported by a Consultation Statement which provides details of the consultation activities conducted prior to the submission of the plan and provides details of the responses received during the Pre-Submission (Regulation 14) Consultation conducted in October 2020.

Appendix 18 of the Consultation Statement sets out details of the responses received from Landowners, Developers and Other Bodies made to the Pre-Submission Consultation and the BNP Steering Group's response to each of these. Appendix 19 summarises the details of residents' responses to the Pre-Submission Consultation. The representation submitted on behalf of Amber is not referenced in either of these Appendices nor in any other part of the Consultation Statement.

Initial contact has been made with Broadway Parish Council to clarify whether our previous representation was considered in relation to the BNP Submission. The Parish Council confirmed that our response had been received however confirmation could not be provided as to whether Amber's previous representation had been addressed in the BNP Submission and whether it been omitted from the Consultation Statement in error.

Noting the requirements of parts c and d of Regulation 15 (2) of The Neighbourhood Planning (General) Regulations 2012 (as amended), we would therefore request that the BNP Submission documentation is reviewed to ensure that all representations made at the Regulation 14 consultation stage have been acknowledged and, where relevant, addressed prior to the BNP progressing to examination.

The remaining parts of this response reiterate our specific representations (as set out at Regulation 14 stage) in respect of the BNP Submission in relation to future housing, pedestrian access/transport, design, and landscape and community matters.

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 Submission Version and associated evidence base. This reiterates the points raised in our October 2020 response. 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 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.

Housing Need

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

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.

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 drafting of the BNP 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 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 Submission 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 (Tranquillity 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 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 Submission on pedestrian access and highway safety. The supporting text within the BNP 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 121). 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. The Submission Version introduces additional wording requiring design to assist a shift from vehicle use to sustainable modes of transport.

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 and new bus infrastructure.. 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:

- New bus stops adjacent to the site. It has been agreed that the 606 service will stop here.
- Improved pedestrian route to / from Broadway village.
- Access to Community Transport via Evesham Community Car Scheme.
- Provision of an electric car club vehicle for residents.
- Access to parking and charging for cycles, electric cycles and electric buggies.

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

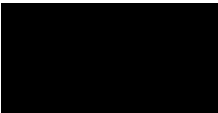
The foregoing analysis demonstrates that some amendments and further considerations are required to the identified BNP Submission policies to ensure they are appropriate and in accordance with local planning policy and the demonstrable accommodation needs of Broadway.

The representations to the BNP Submission broadly reflect the previous response submitted on behalf of Amber to the Pre-Submission (Regulation 14) Consultation in October 2020. Our review of the BNP Submission suggests that these points remain outstanding and have not been factored into the submission policy wording. Noting that this previous response appears to have been omitted within the Consultation Statement, we request that clarification is provided to confirm whether the issues raised in our previous representations have been considered and, where relevant, addressed as part of the BNP Submission.

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.

We trust this response is useful. If you would like to discuss our comments or require any further clarification, please do not hesitate to contact us.

Yours sincerely



Jadine Havill
Associate Director



Appendix 1: Site Location Plan

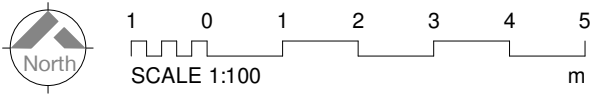


Notes
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Always refer to figured dimensions. All dimensions are to be checked on site. Discrepancies and/or ambiguities between this drawing and information given elsewhere must be reported immediately to this office for clarification before proceeding. All drawings are to be used in conjunction with the specification and all works to be carried out in accordance with latest British Standards / Codes of Practice.

Red Line Boundary

P2 16.07.20 LI Planning Issue - revised mix DP
P1 20.12.19 LI Planning Issue DP

Rev Date Init Notes CHkd



Client

Amber Retirement Living Limited

Drawing Originator

AWW inspired environments
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Bristol - Rivergate House, Bristol, BS1 4LS 0117 923 2535
Plymouth - East Quay House, Plymouth, PL4 0HX 01752 261 282
RIBA Chartered Practice www.aww-uk.com

Project Title
Broadway
Assisted Living Development

Drawing Title
Site Location Plan

Scale	Sheet	Drawn	Checked	Date
1 : 1250	A1	WM	LI	20.12.19
Status	Project No.			
PLANNING	4272			
Drawing Reference	Drawing No.	Revision		
	100	P2		