

18 February 2022  
Broadway Neighbourhood Plan Consultation



Mr Reiss Sadler  
Planning Policy  
Wychavon District Council  
Civic Centre  
Queen Elizabeth Drive  
Pershore  
WR10 1PT



Dear Mr Sadler

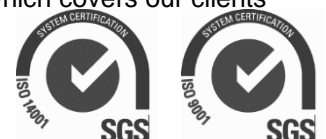
### **Broadway Neighbourhood Plan Consultation**

Thank you for the opportunity to put forward an representations in relation to the current Broadway Neighbourhood Plan consultation process.

We have significant concerns about the consultation process that has been carried out to-date for the Neighbourhood Plan. In particular our client Mr John Robbins, landowner of the site shown in the attached plan, was not aware of the Neighbourhood Plan proposals and has not been consulted at any stage of its development. As such they were not aware of the proposals to designated the northern section of their land as part of a wider Local Gap between Broadway and Willersey (Policy HD.6 Local Gaps and figure 15).

Furthermore, the following sets out our wider response to the Neighbourhood Plan Consultation:

1. As set out in Part 5 Section 14 of The Neighbourhood Planning (General) Regulations 2012, the Parish Council should publicise the Neighbourhood Plan *'in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area'*. The landowner of this site clearly falls into this group but had no knowledge of the Neighbourhood Plan proposals. As such it is maintained that the plan process has failed to meet the regulatory requirements.
2. It is noted that the Broadway Consultation Statement (Revised 17 December 2021) refers to letters being sent out to the owners of land proposed as Local Green Spaces. This should also happen for owners of land in the proposed local gaps, as Policy HD.6 is a strategic designation which seeks to restrict development.
3. In the consultation responses from the Pre-Submission version of the Neighbourhood Plan, it can be seen that planning policy officers at Wychavon Council consider that *'whilst the principle of Local Gaps and the purpose of this protection with respect to Broadway, Childswickham and Willersey is noted, the Local Gaps proposed are overly extensive and should be revised accordingly'*. The Neighbourhood Plan Steering Group response to this clear concern from the Council simply states *'NOTED Local Gap is a separate issue from development boundary'* (Appendix 18 response code 011). This does not provide any rationale for disregarding the Council's advice on the extent of the local gaps.
4. As set out in Planning Practice Guidance, *'proportionate, robust evidence should support the choices made and the approach taken'* when producing a Neighbourhood Plan (Paragraph: 040 Reference ID: 41-040-20160211). In terms of designating a Local Gap between the existing development boundary to the north of Sands Croft Avenue and the A44, it is unclear how the need for this has been evidenced.
5. The background information on the Neighbourhood Plan section of the Broadway Parish Council website does not contain any assessment work which considers the need for local gaps, particularly in terms of the proposed aim of Policy HD.6, which states the Local Gap which covers our clients



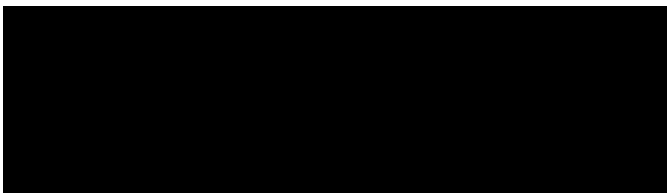
land 'is required to prevent ribbon development within the village between existing housing and the settlement around Smallbrook Road, and to emphasize the separation of Broadway and Willersey...'. An assessment should have been carried out to demonstrate that such a restrictive policy is required, as this is in essence a quasi-Green Belt designation.

If you have any questions relation to this submission and the points raised above, please contact me in the first instance.

We look forward to receiving confirmation of the receipt of these representations in due course.

Yours sincerely

**For and on behalf of Savills (UK) Ltd**



Chris Torbett MRICS  
**Associate Director**

**Encl**

- Aerial boundary plan

Aerial boundary plan

