# Examination Preliminary Finding Broadway's Response to the 15 November 2021 Note, Point 4

### **Background**

On 15 November 2021, Wychavon District Council and Broadway Parish Council received a note from Edward Cousins, the independent examiner tasked with considering the Broadway Neighbourhood Plan.

Point 4 of Mr Cousins' Note states:

"The reference documents included within the Broadway Neighbourhood Plan do not provide me with insight into how the sites evaluation and assessment process was completed, nor provide me with a clear and logical narrative as to how and why the identified site has been included for the particular mix of development proposed."

This document seeks to provide the necessary assurance that a robust site evaluation and assessment process was undertaken and give the reasons why the Kennel Lane site has been included for the mix of development.

#### **Site Evaluation and Assessment Process**

Potential sites for development in and around Broadway were identified in Wychavon District Council's comprehensive Strategic Housing and Employment Land Availability Assessment (SHELAA) in 2018. This relevant and robust piece of evidence was deemed sufficient to form the basis of site selection criteria for the Neighbourhood Plan. Additional work to identify potential sites, such as a local 'call for sites' exercise, was not deemed unnecessary, as it would be time consuming, costly and most of all would simply duplicate the up-to-date evidence already obtained. There is also no regulatory requirement to undertake a separate local call for sites exercise.

As part of the Strategic Environmental Assessment (SEA) an 'Assessment of Reasonable Alternatives' was carried out by Lepus Consulting in close consultation with the Qualifying Body, who assisted Lepus during this process. The SHELAA and the Reasonable Alternatives Assessment formed the evidence base for the site selection process.

The SHELAA covered a total of 22 sites. 18 of these sites were 'ruled out' by Wychavon District Council for legitimate planning reasons but nevertheless these were still considered by the Qualifying Body.

Based on evidence contained within the SHELAA and using local knowledge, the Qualifying Body concluded that only one site (Kennel Lane 0472) offered the potential for development that would benefit the village and have minimal environmental effects on the AONB (a significant constraint affecting the village).

The Kennel Lane site (Policy HD.4 in the emerging Neighbourhood Plan) had the distinct advantage of providing an opportunity for mixed use development including employment and retail on brownfield land (seen as a priority by the government), inclusion of green

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space, and would, unlike many of the other sites being promoted, prevent ribbon development beyond the physical confines of the village on greenfield sites.

The Reasonable Alternatives Assessment also evaluated the existing allocation (SWDP 59/19 - Station Road) already selected by Wychavon for development for potential increase in development capacity.

Both SWDP 59/19 and HD.4 were selected as preferred options in the response to the Reasonable Alternatives Assessment.

Broadway has been in continual dialogue with Wychavon District Council about the suitability and deliverability of development of the selected sites and is currently engaged with Wychavon's Urban Design Team in drawing up plans to maximise the benefits of these sites to the Village community.

### **Kennel Lane Site Allocation**

The Kennel Lane site was selected for inclusion as a mixed use development opportunity in the Neighbourhood Plan for the following reasons:

- a) It is predominantly within the existing defined Development Boundary for the village and within its physical confines. Development on this site would avoid unnecessary creep into the open countryside;
- b) It would assist in meeting the housing needs identified within the Neighbourhood Plan surveys (see Consultation Statement appendices: Mood Card Survey, Village Survey, Housing Needs Survey);
- It is located in the heart of the village and is the most accessible and therefore sustainable site available for selection. The site is seen as a natural expansion of the High Street for suitable retail and employment uses;
- d) A considerable part of the site is classed as brownfield land and is unsightly, underused or disused. Allocation of the site was seen as a priority for redevelopment in order to improve its character and appearance and that of its heritage surroundings by creating a high quality sensitive development.
- e) Development of the site has been approved in a letter of intent by the relevant landowners and is considered to be viable and deliverable".
- f) Surveys carried out as part of the Neighbourhood Plan process have emphasised the need for smaller, affordable homes in the village, particularly for younger families The proposed development of this site would help provide suitable and accessible accommodation for this demographic A preference has also been expressed for smaller scale developments eg. "housing in clusters of 10". The nature of this site would facilitate this.

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- g Wychavon District Council supports the allocation of the site for mixed use redevelopment;
- h) Part of the site contains occupied business premises. The Business Survey made clear the importance of protecting existing employment sites within the village and creating new employment opportunities in suitable locations. The proposed mixed use development of the site would achieve this objective;
- i) In accordance with the emerging Development Brief, redevelopment of the site would be carried out in such a way that views and access to the AONB would not be affected and there would be no adverse effect on Broadway's heritage assets including the conservation area and nearby listed buildings.