



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

01 September 2021

SENT VIA EMAIL

Dear Policy Team,

RE: Broadway Neighbourhood Plan Submitted – Regulation 16 Consultation

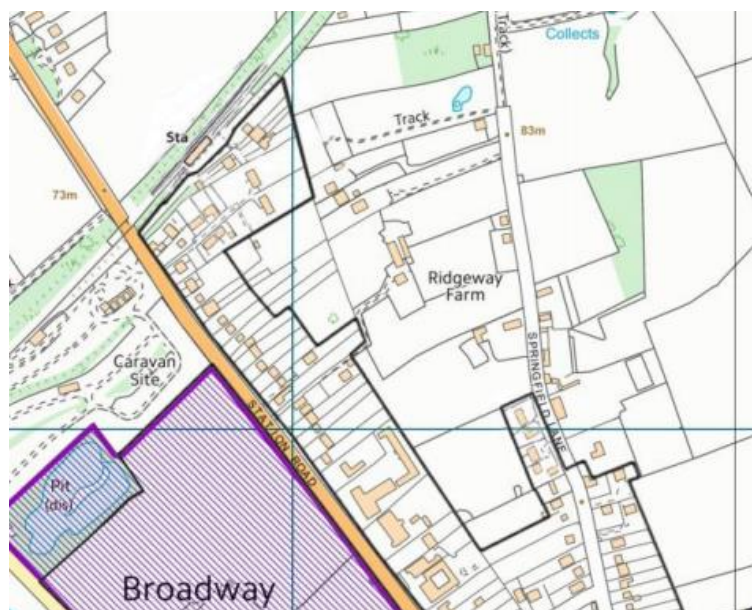
I write in relation to the above consultation to make a representation on behalf of our client, Limes Development, in respect of their site, Land at Melville, Station Road Broadway.

This letter follows on from previous submissions in respect of the same site submitted to the SWDPR (SHELAA Ref CFS0923) during late 2019 and further to the Broadway Neighbourhood Plan Pre-Submission Consultation in October 2020. We do not seek to repeat these submissions and anticipate they will be read alongside the rest of the evidence base.

We have considered the draft Neighbourhood Plan as it now stands and have also considered the policies being proposed. We do not respond to all sections of the plan, only those which we currently consider relevant to this particular site and our particular client. These views are without prejudice to future and parallel submissions.

Our predominant objections lie with the proposed development boundary, as highlighted in figure 3 (page 19) of the Submitted Neighbourhood Plan. We strongly object to the exclusion of the rear garden land of Melville as shown. This is particularly in light of the extension of the boundary around the land at Two Jays (which separately we support on behalf of another client). It would, in our view, make more sense to extend the boundary line from Two Jays, across the rear gardens of the remaining houses fronting Station Road, to the rear of Derby House.

These rear gardens do not constitute open countryside and are clearly utilised as garden space by their respective dwellings. Attached below is an extract taken from the submitted Neighbourhood Plan, which shows the current proposed extent of the development plan boundary.



There is no justifiable reason why the development boundary should be drawn the way it is, and there is clear scope to 'round off' this part of Broadway, as has happened elsewhere. It should be noted that:

- There are no physical site constraints that would hamper the development of this site: the site is located within Flood Zone 1; outside of any of the 'Footnote 6'¹ designations; nor falling within the 'setting' of such designations. Importantly, the land is not within the Area of Outstanding Natural Beauty (AONB) which covers the majority of Broadway.
- The site is not located within a conservation area, nor within the immediate setting of any listed buildings or heritage assets.
- The site presents an opportunity to improve what is currently limited housing choice within the village.
- The site is subject to a live application (21/01445/FUL) and the development of the site would contribute towards self-build / custom-build homes in the Parish, of which there is currently a need within the district².
- The development of the site will improve the biodiversity of the site by significant landscape planting to ensure that it is assimilated into the landscape and will not impact upon the adjoining Conservation Area boundary.

For reference, the site plan below shows the boundary for the land to the rear of Melville. All of the site (inside the red line plan) functions as private garden associated with Melville and has done so since the 1980s.



¹ *'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change'*

² In accordance with Wychavon District Self-Build and Custom Housebuilding Register Progress Report (November 2020) Wychavon currently has a total of 105 entries on the self-build register, within this, 48 respondents selected that they were interested in living in 'any area' and a further 13 respondents specified 'Broadway'.

<https://www.wychavon.gov.uk/component/fileman/file/Documents/Planning/Wychavon%20Self%20Build%20and%20Custom%20Housebuilding%20Register%20Progress%20Report%20November%202020.pdf?routed=1&container=fileman-files>

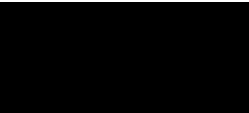
Paragraph 13 of the NPPF (2021) sets out that *'Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.'*

Clearly there is an obligation for local authorities, as set out in Footnote 28 of para 62 of the NPPF: *'Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.'* (our emphasis)

We therefore consider the Broadway Neighbourhood Plan has a role to play in this by facilitating small development plots for precisely this purpose. It is our view that amending the development boundary in this, the least sensitive part of Broadway would go some way in addressing this obligation.

We urge you to give consideration to the points raised in this letter and look to the land to the rear of Melville, Station Road, within the proposed Neighbourhood Plan development boundary.

Yours Faithfully,



Rob Wall BSc Hons, MA
Planning Consultant

