

Our ref: JBB8485

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Dear Mr Reed,

Tewkesbury Local Plan Examination – Bromford Housing Association Response to EXAM026

1.1 Bromford Housing Association (“BHA”) welcomes the opportunity to comment on EXAM026, published by the Council on 15 March 2021. This document sets out the Council’s reasoned justification for moving away from Policy WIN1 as drafted in the pre-submission plan [CD001], to include a secondary access to the emerging allocation which would connect to Orchard Road. For the Council to make this change, the implication is that the submitted policy would otherwise be unsound, albeit this is not inferred by the Council in their note. They instead note that this change is made as an ‘enhancement’ of the sustainability of the site (paragraph 1.2 refers). BHA would agree with this comment, as the change is not essential and not necessary to make the policy sound.

Principle of Policy Change

- 1.2 As part of paragraph 1.2 of EXAM26, the Council note the respective distance thresholds from various points of the site, noting the distance of 1.3km to the Winchcombe School and 1.4km to Winchcombe high street. For completeness, BHA recognise that whilst these figures are broadly correct, they are slightly higher than those recorded by transport consultants appointed by BHA. BHA does not consider these distances require a need for intervention in the current drafting of the policy, nor is it a ‘critical’ issue as suggested by the Council.
- 1.3 Coming to this view, BHA observe practice undertaken elsewhere in Winchcombe. In recent years, the Council has overseen developments at Gretton Road (Redrow Homes)¹ and Green Road (Bloor Homes)², consented, with input from the Gloucestershire County Council as the relevant Local Highways Authority (“LHA”). For the Inspector’s benefit, the location of these proposals, relative to WIN1 are outlined on the plan overleaf. Both of these edge of settlement developments were met, without objection on accessibility grounds, from the LHA.
- 1.4 More recently, it is noted that the LHA has commented on the proposed development to the north of WIN1, submitted by TATA for 35 dwellings to be taken from Kyderminster Road³. This application, is supported by a Transport Assessment which presents a broadly similar set of accessibility standards to WIN1 in respect of the proximity to the core services in the town. Though this application remains undecided, the LHA has provided a response to this application and, importantly, does not raise objection on accessibility grounds. BHA considers that these examples serve to highlight the expectations of the LHA in terms of their view on the relative accessibility of locations in Winchcombe.

¹ 12/00464/OUT. Outline application for residential development comprising up to 120 dwellings, vehicular access from Gretton Road

² 12/01078/FUL. Hybrid application comprised of a full application for 92 dwellings

³ 20/00892/OUT. The erection of up to 35 dwellings (Class C3), vehicular access from Clarendon Road and Whitmore Road, public open space and associated landscaping and engineering works. | Land Off Kyderminster Road Winchcombe

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1.5 The NPPF requires us to maximise sustainable transport opportunities (paragraph 103 refers), but this must be considered in the context of development constraints. BHA notes that the walking distances to facilities from the southern portion of the Site would still be within the recommended 2km walking distance. BHA has considered distances from both the centre and southern corner of the site, which is considered to be robust and takes into account gradient within the walking / cycling times.

1.6 BHA would agree that providing the link would be of benefit, however it is not essential. Therefore, even if it would be benefit for a second access, it would not be necessary based on usual assessments of walking distances to facilities.

Detailed Policy Considerations

1.7 If however the Inspector is minded to retain the new clause proposed by the Council as part of EXAM026, BHA would recommend that a few small but important refinements are made to ensure that the policy remains deliverable, which presently it is not.

1.8 In respect of the new clause (in blue text), the amended policy makes reference to the additional access as something of critical importance. The later text added by the Council (in green) highlights how this will be delivered, through the consideration of a secondary access which will be delivered unless not feasible or viable to do so. The Inspector already has BHA's views on the feasibility of the secondary access, and it is now noted the Council also do raise potential concerns in this regard.

1.9 At paragraph 4.6 of EXAM026, the Council note that the presence of a watercourse, mature trees and the presence of an existing residential development may provide technical difficulties, though there may be an unobstructed route for a pedestrian/cycle access. In reality, BHA observe that the smaller land parcel of WIN1 (promoted by Mr and Mrs Pursey) will not simply be looking to create a cycle route here but also look to include a housing contingent on the site, as supported through the SoCG between the Council and Mr & Mrs Pursey [SOCG16, paragraph 3.3 refers]. As such, BHA considers that it remains more likely that a demolition will be needed at this location, beyond other noted constraints to feasibility.

1.10 It is because of this uncertainty, that the inclusion of that first clause (in blue text) should be removed. The way in which it is worded, including the reference to 'critical importance' infers that the Site cannot be found sound unless this is provided. Yet, the wording proposed (in green text) provides ways in which this point can be circumvented. It stands that these two elements are not compatible and whilst the policy can seek to introduce a requirement for a secondary access to be considered, the reference to 'critical importance' makes the policy unsound. Beyond this, it is noted that the text

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in blue provides little to the way in which the policy will be delivered and if the Council were to look to retain it, in some guise, it should be relegated to the Reasoned Justification.

- 1.11 The new text at the rear of the policy (in green) should, in BHA's view, be easier to implement if necessary. The only change that BHA would recommend at this stage, is to remove the reference to 'Orchard Road' and change the direction of investigation from 'to the south-east' to 'south/south-east'. Whilst only small changes, this would allow BHA to properly consider alternative access points from the Site in a more flexible way, rather than being tied to the single access point onto Orchard Road. If it is the Council's wish to see a secondary access here, opportunities should not be restricted to this access only, as there may be other more suitable options, such as connections to Mercia Road which could achieve the same aim of a betterment in accessibility. Whilst BHA will clearly engage with Mr and Mrs Pursey when exploring alternative options, the policy should not be limited to this access point alone.

Yours sincerely,
for RPS Consulting Services Ltd

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