



## **Response to the SWDP Modifications for Evesham**

**Response Prepared by** – The Vale of Evesham Civic Society

**Date** - 19<sup>th</sup> November 2015

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### **Summary**

The Vale of Evesham Civic Society response mostly concerns SWDP 50/7 which we believe should be withdrawn from the plan, or if this not possible, kept at 200 dwellings. The reasons outlined are based upon Environmental, Historic and Infrastructure concerns.

We also have concerns about SWDP 51, based on infrastructure and the necessity of providing space for a future extension of the ring road around Evesham to connect to the A4084 Pershore Road. We believe this allocation should be kept at 400 dwellings.

We wish to clarify the shopping centre provision in Evesham which appears to have been described inaccurately.

We wish to retain in the plan the identification of individual infrastructure projects.

### **Our involvement**

We have been involved in the proposals for Abbey Road since March 2014, our thoughts were set out in a letter by past Chairman David Way to Jack Hegarty dated 14<sup>th</sup> July 2014, based on the information available.

We supported development at that time and suggested “it offers a unique opportunity to create a landmark development which combines housing, social, cultural and leisure amenities” but noted - *“Bearing in mind the many housing planning appeals won against the Council including the very recent decisions of the Secretary of State to allow the recovered housing appeals at Droitwich, we can expect no mercy ahead of the final approval of the South Worcestershire Development Plan. We are totally unprotected with the Secretary of State giving ‘little weight’ to either the out of date Wychavon District Local Plan or the emerging SWDP, the policies of both, ‘significantly outweighed by the inability of the Council to demonstrate a five-year housing land supply.’* We had previously sought to try and influence the architectural and aesthetic aspect of the site only, without being aware of the other factors now expressed in this submission

Our involvement on Cheltenham Road has been since proposals were presented at a public consultation in April 2015. We contacted the developer with our thoughts via email setting out some initial observations.

Proposals for the Employment Area adjacent to Vale Park have only been available since a public consultation this month and we have made as yet no comment to the developer.

With the publication of the outline planning application by Hallam Land for Abbey Road and by Bloor Homes for Cheltenham Road, public awareness of the proposals set out in the SWDP became confused and we decided to hold a public meeting on 12<sup>th</sup> November 2015. We believed the meeting would provide information on the Plan, the on-going applications and the consultations taking place. As a “Civic” society we considered it our responsibility to further investigate the implications all the proposals would have on the community and encourage local people to make their own responses to both the SWDP modifications and the planning applications.

The National Planning Policy Framework requires that planning should be genuinely plan-led, empowering local people to shape their surroundings and setting out a positive vision for the future of the area.

### **SWDP 50/7 Abbey Road – Allocation of 200 houses – Modification Proposed to 250 houses**

As a consequence of the Public Meeting and our investigations, much new information has become available showing that this development would bring with it a very significant detrimental impact to the historical importance of the site and that traffic flows from the site would exacerbate an already inadequate and congested local road network. We believe we can best represent local people and their wishes on the proposals, SWDP50/7 Land around new Leisure Centre, in this matter **by objecting to the proposals for the extra 50 houses and indeed by proposing the whole site is omitted from the Plan.**

The SWDP first included the Abbey Road site in the August 2012 revisions and deleted the Abbey Gardens site. When deleting Abbey Gardens (SOC 049), the SWDP claimed “To ensure that the SWDP demonstrates that it has been positively prepared, it needs to be amended. It is considered that progressing with this site would be detrimental to the existing views into the town and would impact on the setting of the historic Bell Tower, a scheduled ancient monument, and access to the highway i.e. Abbey Road is substandard. The site therefore requires deletion.”

The same reasons for excluding this site must apply to (SOC051, or SWDP50/7 as it is now referred to). Access is on to the same road and the views are similar. We acknowledge that brown field land under Wychavon District Council’s control has been used for the Leisure Centre and will be used for the new Fire Station but the views and land that remain are of great significance visually and historically. They also contribute economically to the prosperity of the Town through tourism, still providing views to the Churches and Bell Tower from the riverside walks, a feature that has helped tourism and provided much employment in the area.

### **Future Planning Consideration**

It is also noted that because land is included in the SWDP allocation it does not mean development is possible. There seems little point including land if it is subsequently not going to be approved by the Local Planning Authority because some, or all of the aforementioned points, would tend to rule it unsuitable for development. If the LPA are subsequently overruled by a higher authority even at appeal it still needs to meet the criteria set out in the SWDP.

Furthermore there is a potential funding gap to deliver the future infrastructure required by the SWDP (See Infrastructure Delivery item 99) as it will be reliant on private investment to achieve it.

### **Historic Environment**

SOC150 Suggests the SWDP should “*help sustain the historic character*” and “*enhance those aspects of the historic environment which are recognised as being of special historic, archaeological or townscape*”

*significance*". The submission made by Historic England, reproduced below, clearly identify these characteristics in this site. We endorse the objections raised by the Historic England submission.

### *"Historical Development*

*The historical development and current appreciation of Evesham is significantly determined by Evesham Abbey. Evesham Abbey was founded as an Anglo-Saxon minster in about 700AD and continued as one of the wealthiest, medieval, Benedictine abbeys in the country, through to its dissolution in 1540.*

*Throughout the medieval period, the loop of the river enclosed farmed land which provided food to the abbey. The area, an open landscape, has been preserved by its continued use for agriculture and horticulture.*

*The presence of the abbey and the outer precinct wall has directed the historical urban growth of Evesham to the area north of Merstow Green and in the settlements surrounding Evesham.*

*Urban development to the south of the precinct boundary has been very limited. Residential development is barely present in this area. Although there has been development, the experience in the area south of the wall preserves the openness of the historic character.*

*This is particularly apparent in the west of the loop, where excellent views incorporate this open, agricultural landscape with the visible remains of Abbot Chyryton Wall and its alignment with visible components of the abbey complex and the river. This area preserves the historic relationship of the abbey, the town, and the land; permitting the viewer to experience and understand the historic significance of Evesham and its Abbey.*

### *Evesham Conservation Area*

*The setting which includes the Evesham Conservation Area is within the loop of the river and the application site positively contributes to this setting. The special interests that underpin its significance as a conservation area include:*

- *Strong survival of the Saxon, medieval and post-medieval street pattern, urban form and buildings, including burgage plots.*
- *Strong visual and historic relationship between the town and its riverside*
- *The siting and prominence of the abbey.*
- *The significant contribution of trees and open space.*

*The conservation area appraisal recognised that:*

*'...the historic relationship of the town to its horticultural hinterland is largely lost. The exception is the remnant area of market garden to the south and west of the historic core within the loop of the river, where the former horticultural setting of the town is preserved. Here the historic relationship of the town with the river and surrounding land is still apparent in views on approach from the south and west. The approach from Pershore towards Waterside still retains a very pleasant green and leafy ambience from the dominant presence of green spaces, trees and the river. Preservation of these features and ambience of this area is important to the setting of this part of the conservation area'.*

*The setting of the Abbot Chyryton Wall with an open landscape to the south makes a positive contribution to the historic value of its significance by retaining this contrast. The openness of the loop in the river and the historic development of Evesham are fundamental to the character of the settlement. They have a strong communal value as they provide a focus for the local community.*

*This area provides aesthetic value and green infrastructure in close proximity to the town centre, which is a quiet, contemplative space that both permits the enjoyment of the historical character and is a direct link back to its use in the medieval period.*

*The open character of the site contributes greatly to the significance of the designated heritage assets: it reinforces the historic character, understanding and experience of these assets. Maintenance of the open character is important to maintaining the significance of the designated heritage assets.*

### Impact

*This large scale development on this sensitive location would result in the loss of the sense of contrast between this largely open, agricultural/horticultural landscape, the urban form of Evesham town centre and its relationship with surrounding suburbs that is fundamental to the historic character of Evesham.*

*The development would remove the horticultural hinterland that is important to the setting of the Conservation Area, would erode the communal value that the historic form gives to the community, would erode Evesham's strong historic character and cause serious harm to the significance of the Conservation Area. It would weaken the strong historic form of Evesham town centre and largely remove the strong historic relationship between the town and its hinterland.*

*This development would prevent the designated heritage assets being seen in their historic view. The development would undermine the sense of unity of this landscape and destroy its aesthetic qualities. These historical, evidential, aesthetic and communal values are critical to an understanding of the designated heritage assets and the loss would cause serious harm."*

### **Cheltenham Road Allocation (SWDP 51) Allocation 400 houses, Modification proposed to 500 houses**

(Comment made on Transport Infrastructure within this section highlights a specific impact as a consequence of this site being enlarged in the SWDP proposed amendments)

We object to the proposed increase of 100 houses to 500 houses proposed in the SWDP for the following reasons:

- There is currently an outline planning application on part of this area of the SWDP for 460 houses. There is no provision in the SWDP or the application for the possibility of any form of relief road off the A46 trunk road roundabout.
- It is considered that this link is now needed, both to cater for the additional traffic generated by new housing off Cheltenham Road and the new housing being built and planned off the B4084 Pershore Road in Hampton.
- It is accepted that such a "link" may have weight and width restrictions because of any possible heavy goods traffic impact on Pershore. It should be noted that this link is shown in the Evesham Town Plan, page 35. In 'Traffic Priority areas for action', action 3 reads, 'Make provision for and safeguard an extension of the Evesham ring road around the south west side of the town to connect the A46 and the B4084.'
- To accommodate this future need any such link should not have housing directly off it to prevent hazard and congestion and as a consequence will lead to overdevelopment on the proposed site that remains.
- There is already a proposal for 49 houses in this area that is pending consideration and outline proposals for the 460 houses, both on the SWDP proposed development site. Within 150 metres there will be numerous junctions on to Cheltenham Road, three leading to the developments

mentioned and two to the existing Thistledown opposite. There is also the main junction proposed with the A46 Trunk Road Roundabout by the Football Ground leading to the Employment Land mentioned below.

### **The Employment Land off Vale Park (SOC 046)**

This is commented on to ensure the necessary infrastructure especially Highways, Pedestrian and Cycle way provision are in place prior to development commencing, as noted in the SWDP

- Again the problems of Highways still exist, as mentioned subsequently, and it will directly impact on a National Highways trunk road.
- The site access is off the A46 roundabout and shares that with A 46, two junctions, Cheltenham Road, Football Club and the proposed SWDP housing development land as previously mentioned.
- The infrastructure work needed to upgrade this junction will be considerable and only a few years since the Club at their own expense were obliged to reconstruct it.
- This road is often blocked by sheer volume of traffic, it has only two lanes and acts as a relief road to the residents to try and avoid the congestion in Evesham.
- There have been occasions when the M5 motorway is closed or delayed and the A46 is used to divert or escape the congestion.
- There have been numerous accidents on one or other of the six roundabouts around Evesham causing complete gridlock.
- There is an Archaeological site at the entrance to the proposed development.

### **SWDP Transport Submission**

The Civic Society objects to the SWDP Modifications on Transport Grounds. It further considers that the proposed Abbey Road allocation SWDP 50/7 should be removed from the proposal. The reason for this is several important changes have occurred since 2011/12 when the earlier 'Preferred Options' were put forward and consulted upon.

We consider that the Cheltenham Road allocation should remain at 400 houses.

### **SWDP Strategy**

SWDP1 Development Strategy and Settlement Hierarchy paragraph 4 says: - Development will be infrastructure led where new development is infrastructure dependent. At SWDP3, Sustainable Development Principles, development proposals must:

*'Ensure both the strategic and local road network will be capable of safely, without undue environmental consequences, accommodating the type and volume of traffic likely to be generated.'*

### **SWDP Infrastructure Development Plan**

It is stated in the plan that all necessary infrastructure will need to be in place before the appropriate stage of development is commenced.

In the case of Evesham's transport infrastructure, we do not think it would be possible to provide the transport infrastructure necessary to cater for existing and future transport needs without new roads and

bridges. Such provision would be disruptive, expensive and would probably need to involve demolition of some houses.

### The Role and Capability of Worcestershire County Council

The Council as Highway Authority for the local road network is expected to provide reliable and expert advice on any changes including traffic generation due to new developments. The WCC Local Transport Plan 3, 2011-2026 has the stated aim of, 'delivering a transport strategy that is of greater efficiency and makes better use of resources to meet economic, environmental and social challenges'.

The Local Transport Plan has nine over-arching objectives, two of which are:

- The reduction of congestion;
- The securing of infrastructure and services to support development.

It is noted that Worcestershire County Council raised no objection to the proposed SWDP on traffic grounds.

We challenge the ability of the Council to provide proper advice. This is based on two pieces of evidence

- The County Council has failed to respond as required to many major Planning Applications in recent years. Often there is no comment at all or just a comment requiring a Travel Plan to be provided. It is understood that the County Council staffing levels in the appropriate department have been cut making proper assessment difficult for the staff that remain. It is noted that the County Council has not made any comment on Planning Application 15/2325 for Abbey Road.
- There is no Evesham Transport Model that can be used as a sensitivity test for the modelling required to provide a Transport Assessment. Despite the non-appearance of the County's model for the town, the SWDP has drawn conclusions that are unfounded. The County Council when judging the implications of large developments and providing information to the Inspector have had to rely on the 'Evesham Transport Model' which is spreadsheet based. We understand that this is not fit for purpose, it is difficult to use and has been unavailable at times. We now understand that the County Council are considering the commissioning of a VISSIM Micro Simulation model for Evesham.

We therefore feel that the County Council should have objected to previous planning applications due to the detrimental effect on traffic levels in Evesham, and especially on the roads leading to the two bridges. We feel sure that they cannot be relied upon in advising on future traffic levels which would be generated by the proposed SWDP developments, at least until the VISSIM model is available.

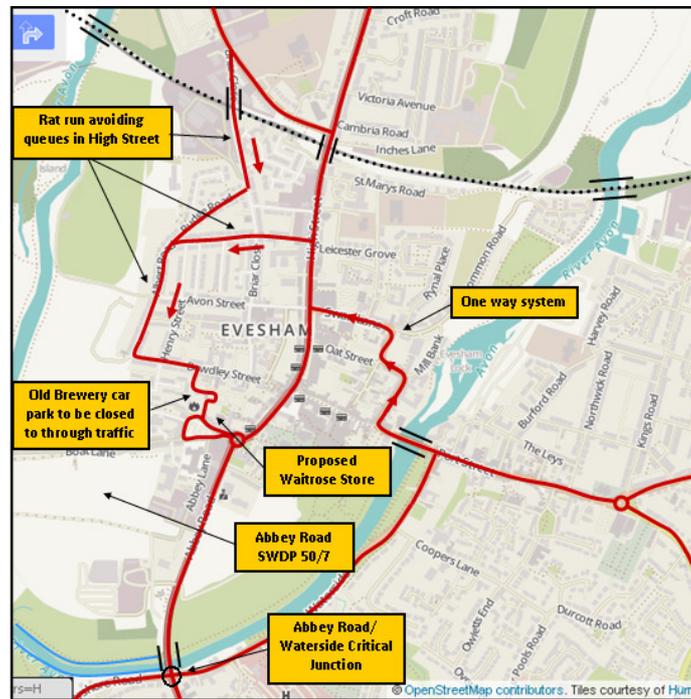
We therefore have no trust in the County Council's comments (or lack of them) with regard to the ability of the road system to cope with future needs.

### Evesham Highway Network

Evesham's highway network has been much criticised over the years and this was shown in the Town Plan consultation where easily the most negative aspect of Transport was considered to '*Traffic congestion and system*' (page 32 of the Appendix).

The system is constrained by the river Avon and the narrow streets between Workman Bridge and the High Street. Workman Bridge is effectively one way and this means that Abbey Bridge takes all of the traffic from the Town Centre towards Hampton and Bengeworth. The critical junction in the town is at Abbey Road/Waterside/Pershore Road/Cheltenham Road and this has been stated to be over capacity by Worcestershire County Council Highway Officers. There is also a very well used 'Rat Run' extending from

Worcester Road through Briar Close, Albert Road, the Old Brewery car park and Merstow Green. The main features of the town centre traffic system are shown on the figure below.



### Evesham's current traffic situation

Day to day evidence shows that the queues and delays are a daily occurrence and this often occurs throughout the working day. At the present time late afternoon/evening traffic travelling south on High Street/ Vine Street / Abbey Road is frequently backed up along its entire length to Greenhill. In the northbound direction, there are queues reaching back to the A46 along Cheltenham Road. In the westbound direction queues extend back along Port Street and into Broadway Road and Elm Road. In the eastbound direction queues extend back into Hampton along Pershore Road.

It is the opinion of local people that the traffic situation has got much worse this year.

### Factors which affect the traffic situation.

#### 1. Abbey Bridge and Abbey Road/Waterside junction

Abbey Bridge reopened in March 2014. The bridge carriageways have been widened, but the main change affecting traffic flow was the change to the Abbey Road/Waterside junction. The junction had much needed pedestrian facilities included and this has restricted the capacity of the junction.

#### 2. Continued Housing Development

Evesham has seen continual housing development over the past few years. This has put increasing pressure on the road system which will continue to increase as the new houses are completed and occupied.

#### Housing now being built and occupied

- Offenham Road. Over 500 houses, now being occupied
- Lavender Fields and Poppy Fields. 300 houses, now being occupied
- Broadway Road 36 houses – Now being occupied
- Bewdley Street 59 houses, now being occupied.

- Extra care, apartments and sheltered occupation – High Street, Cheltenham Road, Offenham Road
- Pershore Road – 27 houses being built.
- Martin Avenue – 60 affordable houses and apartments built
- Waterside - 60 apartments built

Yet to be started are developments in:

- Pershore Road 400 houses
- Pershore Road 120 houses (at appeal)
- Cheltenham Road – (SWDP) 400 or 500 houses
- Abbey Road – (SWDP) 200 or 250 houses
- Offenham Road – Two developments with 90 houses
- Kings Road 100 houses

The Plan also assumes that it will be a programme of development for the next 15 years, but it is more likely that employment land off Vale Park (SOC046 - added in 2012), 400 homes off Cheltenham Road and 200 houses off Abbey Road (SWDP50/7- added in 2012) will progress within the next 5 years. The Wychavon District Local Plan says that development may be permitted so long as it does not have an adverse impact on particular issues including, 'the efficient operation of the transport network'

### 3. Waitrose Store Development

The Planning Application for the Waitrose Store in Merstow Green was approved in February 2015. The store will attract considerable numbers of cars and some HGV trips which will put further pressure on the Town Centre road system.

### 4. Closure of Old Brewery car park to through traffic

To enable the Waitrose development to take place the Old Brewery car park is to be closed to through traffic which currently uses it as part of a route to avoid queues in the High Street. The volume of traffic using this route is considerable with an evening peak hour flow (recently surveyed) of over 400 vehicles. The closure of this route will further delay the High Street traffic and the queuing traffic will block up the important Swan Lane junction.

It should be noted that the use of the rat run has risen with the occupancy of the new stores in Worcester Road such as Marks and Spencer in November 2013. A new D & M store is also planned which will further add to pressure to use this route.

### 5. Category 1, 2 & 3 Villages and the SWDP

Many of these villages are within a 5 mile radius of Evesham. They are dependent on the town for goods and services. They also are being greatly developed and in some cases fall within the SWDP proposals. Traffic generated and increased demands on essential services by these villages, impact initially on the A46 trunk road roundabouts and then within the town.

## **Pollution**

Concern has been expressed in the past about pollution from traffic in Port Street. With frequent queuing throughout the town, this now affects the whole town centre.

Pollution caused by inadequate drainage is covered later.

## **Commercial Viability of the Town Centre**

We consider that the town centre's commercial viability is already affected by the difficulties people experience in driving to the town centre. VECTA, the Vale of Evesham Commerce and Tourist Association recently wrote to John Smith, Cabinet Member for Transport, Worcestershire County Council on this matter, particularly relating to the delays approaching the Abbey Road/Waterside junction.

In particular the commercial viability of the substantial investment by Wychavon in the building of the Waitrose store could be put in jeopardy by the difficulty of access created by the traffic situation along Abbey Rd and the High Street.

The additional housing development, the new stores in Worcester Road, the proposed Waitrose store and the closure of the Old Brewery car park to through traffic will further increase traffic congestion and reduce the overall viability of the town centre.

## **Other infrastructure issues**

### **Doctors' Surgeries**

In response to our enquiries we received one reply highlighting the current position

*"As you will be aware there has been a tremendous increase in housing throughout Evesham and surrounding villages. It was always my belief that building on this scale would generate / trigger section 106 money to help deal with the increase in costs associated with infrastructure; Schools, Health etc. Not one penny has been allocated to primary care to my knowledge, and when we questioned this a couple of years ago the District Council informed us that it had already been allocated."*

We note there is provision in the SWDP for a Development Levy and, as with many of the terms and phrases used, it is confusing to the reader. We assume this is part 106 agreement and it seems no information is provided on how it is distributed, it is essential this is seen to be used for community benefit when attached to increased development.

We have also been advised that on the 19<sup>th</sup> November there is to be a Joint Practice meeting, representing all the Surgeries in the area, to respond to the issues raised in the SWDP and current planning applications. If their opinions are available after completion of our response, but before the SWDP deadline, we will add it as an addendum.

### **Storm and Foul Drainage**

The drainage systems in Evesham are largely a product of the Victorian era, often a combined system and in some cases in the older parts of the town reliant on brick culverts to carry sewage. The town is very liable to flooding and as a consequence pollution can be caused to residential areas, Port Street, Waterside, Pershore Road to Hampton and along the flood plain of the Avon and Isbourne Rivers. This will impact on both the proposals for Abbey Road and Evesham and in both instances form a major part within the open space proposals for any development. These areas will be by definition open to the public and as such pose a potential health risk when accessed after periods of flooding.

James Powell (Environmental Health Consultant) has submitted an objection to the revised SWDP: part of his submission refers to the old drainage systems. The Civic Society supports his submission.

Two large syphons from east and west pass under the River Avon to Sewage Works on Corporation Meadow. 50 years ago a treatment plant was constructed west of Evesham to meet the increased demands of the town, since then very little has been done to improve the system.

New developments are constructing large holding tanks and pumping chambers to pump effluent via a small diameter pipe into the old drainage systems. The new developments are experiencing many problems with this system, residents experiencing blockages on a regular basis (Persimmon Homes 150 new homes off Cheltenham Road).

The other means of disposal of surface water is via storm drains to lagoons and filter beds, these are rendered ineffective at times of flooding as will be the case on Cheltenham Road and Abbey Road.

The opportunity for pollution occurring in our watercourses and rivers is considerable with these new developments and will raise issues in the future for public health.

### **Housing Supply**

The Inspector's strategy for the SWDP in his recent Main Modifications features an increase of 5170 in the number of properties required in Wychavon. Developments and significant applications have been submitted since the SWDP process started in 2010. In Evesham alone approximately 1500 new homes have been built or are proposed, excluding the applications at Abbey Road & Cheltenham Road. We have not been advised how these increases have been calculated in the Inspector's Main Modifications if at all.

The projected housing requirement which the Inspector recommended in March 2014 is 9,950 dwellings. This was contrary to the South Worcestershire Councils, where the housing requirement for Wychavon is 10,600 dwellings and applying a "headroom" percentage addition which varies between 5 and 20%, but assuming, 5% gives a total of 11,130. Assuming this "headroom" is applied to the Inspector's figures it gives a total of 10,500 which is closer to the 10,600 quoted in the SWDP.

### **Conclusion – Housing Supply relating to SWDP50/7 & 51**

There is a considerable difference between the numbers quoted above and it leads us to the very clear view that the housing requirement is sufficient, based on the Council's numbers without inclusion of the Abbey Road Site (250 houses) or the increase in numbers on Cheltenham Road (100 houses).

Wychavon is one of only four Local Authorities in the whole of the West Midlands to exceed their annual house building quota for the last year. There is no valid reason to allow such an increase in housing when it seems they are easily on target to complete their part of the SWDP.

For this reason, while we are supportive of the SWDP, we believe that the proposed Abbey Road housing development should be removed completely from the Plan, and that the additional houses proposed for Cheltenham Road should also be removed.

### **SWDP9 Shopping Centres in Evesham**

Within SWDP9, Creating and sustaining vibrant centres

Table X sets out the four categories of shopping centre in the Worcestershire hierarchy. These are: City and Town Centres, District Centres, Local Centres and Neighbourhood Centres. However there is no explanation in the case of the latter two types to explain their difference. In Evesham, Davies Road and Fairfield are Local Centres, whilst Hampton and Cheltenham Road are both Neighbourhood Centres. We do not understand the separate categories because they are of a similar size and each serves its immediate hinterland.

More seriously, Port Street in Bengeworth and The Link which has several large stores and are both substantial shopping areas with large catchments, fail to be mentioned, or included in Table X.

We therefore feel that the following changes should be made:

1. Explain the difference between Local and Neighbourhood centres or amalgamate them if there is no justifiable or substantive difference.
2. Include Port Street and The Link as District or Local Centres.

### **SWDP7. Identification of Transport Infrastructure Measures**

Prior to the current modifications now being consulted upon, certain major infrastructure measures were identified, for example '*A new pedestrian and cycle bridge to connect Offenham Road with the High Street*' and '*Improved parking provision at Evesham Railway Station.*'

In the modified document, most of these measures have been become unnamed and are collected together as necessary measures within the Infrastructure Section SWDP7.

We feel that the measures should still be individually identified within the appropriate SWDP section.

End of document

Vale of Evesham Civic Society Nov 2015