



A Response Objecting to Outline Planning Application by Hallam Land Ltd.

Off Abbey Road, Evesham – Ref 15/02325

Response Prepared by – The Vale of Evesham Civic Society

Date - 27th November 2015

Our involvement

With the publication of the outline application by Hallam Land for Abbey Road, public awareness of the proposals set out in the SWDP became confused and we decided to hold a public meeting on 12th November 2015 to provide information on the application. As a “Civic” society we considered it our responsibility to express those opinions and further investigate the implications all the proposals would have on the community.

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.

As a consequence of the Public Meeting and our investigations, information has become available showing that this development would bring with it a detrimental impact to the historical significance 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 Hallam Land’s outline application in this matter **by objecting to the proposals**

The views and lands 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.

We endorse the objections raised by the Historic England submission and have reproduced their objections in full and **we object to the proposals on historical, evidential, aesthetic and communal grounds.**

Accordance with the emerging SWDP

The SWDP has just completed a consultation exercise where recent people were asked their views on certain modifications. In the case of Abbey Road, the modification was to increase the housing allocation from 200 to 250 dwellings. The Civic Society in responding to the consultation and has said that 250 dwellings are unacceptable. In addition because of various factors described below such as the forthcoming Waitrose store scheme, then it would be best if the Abbey Road allocation were reduced to zero. The application is for 380 dwellings and office space. This does not accord in anyway with the SWDP.

“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."

The spine road to the proposed development will pass through Abbot Chryton's Wall, a scheduled ancient monument. We understand that much of the remains of this wall are underground the new road will damage what is left. Boat Lane currently serves Raphaels Restaurant, the riverside leisure area, car park and a large holiday park. Hampton residents and holiday makers regularly cross the river by the rare rope pulled ferry, especially in the summer months. The impact to allow access to these long enjoyed facilities can only be achieved by taking down part of the protected Abbot Chryton's Wall.

Transport Submission - The Civic Society objects to the Application on Transport Grounds

(Reference is made to the guiding principles of the South Worcestershire Development Plan (SWDP)

The WCC Local Transport Plan 3, 2011-2026 which has the 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.

This cannot be achieved by this application

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.'

Role of the Highway Authority

The Worcestershire County 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. We are concerned that Worcestershire County Council as a Statutory Consultee has not (as of 27 November 2015) made any comment on Planning Application 15/2325 for Abbey Road.

It is appreciated that the Highway Authority does have difficulty in making expert comment. This is because there is no current Transport Model that can be used as a sensitivity test for the modelling required to provide a Transport Assessment. The County Council when judging the implications of large developments and providing information to the Planning Departments 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 object to this planning application due to the detrimental effect on traffic levels in Evesham, and especially on the roads leading to new Abbey Road bridge. We do not feel confident that they can be relied upon in advising on the traffic levels generated by the proposed application; at least until the VISSIM model is available.

Evesham's current traffic situation and factors which will affect the future 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. We are confident that the traffic situation will continue to deteriorate due to the factors outlines below:

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.

3. Waitrose Store Development

The Planning Application for the Waitrose Store in Merstow Green was approved in February 2015. The store will attract considerable number car 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 with and 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 store 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. Increased popularity of the Leisure Centre. The Leisure Centre has been a success and additional car parking provided. The Leisure Centre now generates additional traffic.

Implications arising from proposed Abbey Road Development

If this development goes ahead there will be additional traffic movements loaded onto the local network at Abbey Road. This will have a knock on affect on the whole town road network and particularly on the Abbey Road/Waterside junction which is described by the Highway Authority as 'Over Capacity'.

The access proposed is via the existing Abbey Lane junction, a priority junction. Due to the constant queuing in Abbey Road, we feel that this junction will be unable to work efficiently and cause further delay in Abbey Road.

We note the Transport Assessment that has been carried out which attempts to show that the development will not have a detrimental affect on the town's traffic system. The assessment uses old traffic figures and we are not satisfied that the assessment takes into account the factors outlined above which all have a detrimental affect on the traffic system and add to congestion and delay.

Cycling

In the Application's Transport Submission, Abbey Road is described as a National Cycle Route NCN 41. This is not so. Abbey Road has no current cycle facilities along its length (apart from a very short section of cycle lane outside the Almonry) and it is understood the Highway Authority does not attend to provide any.

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.

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 have also been advised that on the 19th 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 planning 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.

Part of James Powell's (Environmental Health Consultant) submission refers to the old drainage systems. 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 Abbey Road.

The opportunity for pollution occurring in our watercourses and rivers is considerable with this proposed development and will raise issues in the future for public health.

Objection Based on Local Authority Requirements

The Outline Planning Application is for a mixed use development to provide up to 380 dwellings, employment uses (up to 2,500 sq metres of B1 business uses). **Without acknowledgement of the exclusion of development contained in our SWDP submission, dated 19th November 2015, the current SWDP proposes that either 200 or 250 are recommended for this site and on that basis alone this application should be refused.**

Prepared by John Goodwin, Richard Thomson and Collin Tether, on behalf of the Vale of Evesham Civic Society, November 2015