



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

### **Off Abbey Road, Evesham – Ref 16/02814**

**Response Prepared by** – The Vale of Evesham Civic Society **CT amendments in red**

**Date** - 16<sup>th</sup> January 2017

#### **Our involvement**

With the publication of the outline application Ref. 15/02325 by Hallam Land for Boat Lane / Abbey Road, public awareness of the **modification** proposals set out in the SWDP became confused and we were persuaded to hold a public meeting on 12<sup>th</sup> November 2015 to provide information on the SWDP and that application. As a “Civic” society we considered it our responsibility to express those opinions and further investigate the implications that this revised application 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 at that time and on receipt of the revised application, information has become available showing that this development would bring with it a detrimental impact to the historical significance of the site. That traffic flows from the site would exacerbate an already inadequate and congested local road network and the proposals overload an already inadequate infrastructure. 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 **are currently** unable to access the “new” Wychavon Website to confirm that Historic England’s objections had be lodged. We endorse the objections raised by the Historic England submission for Application 15/02325 as being relevant to Application 16/02814 and have reproduced their objections in full. and **we object to the proposals on historical, evidential, aesthetic and communal grounds.**

#### **Nature of Application**

The application is an ‘Outline Application’ and as so will not contain the detail to be contained in a further application dealing with ‘reserved matters’. We feel that some more information should have been provided as it is difficult to comment on the application. For example, no real information has been provided on maintaining views from within the site to the river, nor any information on providing a link to Hampton via a

new pedestrian/cycle bridge, for which we understand funding has been allocated. It is fundamental to the design of the development, even at outline stage that these matters are included. .

### “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 and will cut Boat Lane, preventing access to the 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 accommodate these long enjoyed facilities can only be achieved by taking down part of the protected Abbot Chryton's Wall which is a significant ancient monument.

### Transport Submission

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

### The Civic Society objects to the Application on Transport Grounds

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. 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. '*

We now understand that Worcestershire County Council had made comment on the original Planning Application 15/2325 for Abbey Road, objecting to the proposals. This information was obtained by David Ashley under "freedom of information" and is no doubt noted in his own objections. This lack of transparency by Wychavon will cause a lack of confidence in the fairness of the local planning system. There is no Evesham 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. The County Council commissioned a traffic survey in September 2016 and a VISSIM Micro Simulation model for Evesham and that the results of this are expected in late Spring 2017.

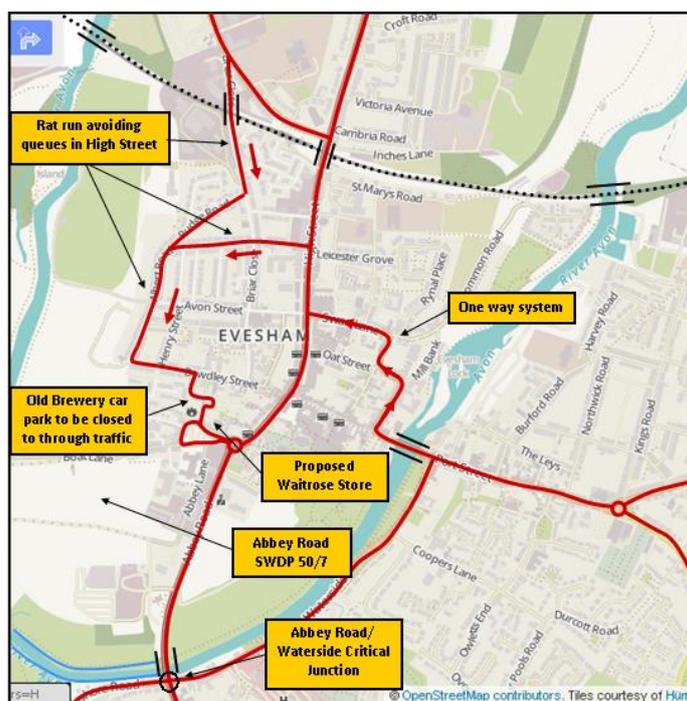
We therefore feel that the County Council should again object to this planning application due to the detrimental effect on traffic levels in Evesham, and especially on the roads leading to new Abbey Road bridge. We do not feel reasonable assessment can be made by the proposed application until the VISSIM model is available and until its conclusions are implemented

#### 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 construction of a "priority junction" on Abbey Road would therefore exacerbate congestion into town and out to Abbey Bridge. This is the critical junction in the town, joining 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. A46 Congestion.

During 2016 there have been numerous occasions when the A46 has been closed because of accidents or roadworks. On these occasions traffic has been diverted through the town causing gridlock. Similarly when the A46 is busy at holiday time or when the M5 motorway is closed or delayed, through traffic seek an alternative route through the Town. Again these circumstances result in serious delays through Evesham

#### 3. 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.

#### 4. Fire Station and Waitrose Store Development

The relocating of the Fire Station to Abbey Road and Planning Application for the Waitrose Store in Merstow Green was approved in February 2015. These changes were not considered at the time the SWDP were developed and did not form part on the traffic model for Evesham. The store will attract considerable number car and some HGV trips which will put further pressure on the Town Centre road system.

#### 5. 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 **in April 2017** 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 now under construction** which will further add to pressure to use this route.

### **Traffic 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 and approaches.

Recent studies have also indicated the dangers to health of diesel emissions and to people living within 10 M (**10 metres???**) of a busy road especially when traffic is stationary.

### **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 wrote to John Smith, the then 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 and Health Centres**

In general comments from Doctors Surgeries and Health Centres ,NHS Hospitals and Schools could not be obtained due to concerns over politicising the present demands placed on services but we were advised by one practice that

*...the increase in housing throughout Evesham and surrounding villages has resulted in extra pressure being placed on the services provided. The closure of the last village satellite surgery means that the all patients travel into the town surgeries increasing pressure on the practice, the local and the area infrastructure.*

#### **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 Application inaccuracies**

#### Outdated Plans

These drawings do not show the location of the new Fire Station and Practice Facility to the southern end of the site. This is important because the fire training facility will have an impact on any development within a 10 M radius or up to 50 M at times of a prevailing wind. The application shows 10.5M high buildings along the length of the Fire Station and Leisure Centre boundary, many of these buildings will be affected by the Fire Training facility.

#### Planning Statement

**1.21.** This statement is in error. It states that "In March 2014 works to the Abbey Bridge were completed which has increased capacity from 2 to 3 lanes improving access to and from Evesham."

This work did not increase the capacity of the bridge as we well know. It previously had 3 lanes to allow for the Hampton traffic turning right on exiting the town. **New pedestrian crossing facilities were installed at the junction when the new bridge was completed and it is probable that the capacity of the junction has now decreased.**

#### Outdated Environmental Statements

The Environment Agency disagrees with the applicants, concluding that the application is not accompanied by a suitable current FRA and therefore the applicant has failed to demonstrate that the proposals are in accordance with paragraph 103 of the current NPPF. They require the FRA to be updated to include consideration of the updated climate change allowances and confirmation of what information (i.e. flood levels) have been used to inform the FRA.

With regard to Foul Drainage they further state that the Council must ensure that the existing public mains sewerage system has adequate capacity to accommodate this proposal, in consultation with the relevant Sewerage Utility Company.

### **Objection Based on Local Authority Requirements**

The Outline Planning Application is for a mixed use development to provide up to 220 dwellings, 60 Care Units and employment uses (up to 2,490 sq metres of B1 business uses). **The adopted SWDP states that residential development of 200 units are recommended for this site and on that basis alone this application should be refused.**

It should be noted that there was a consultation in 2015 within the SWDP process to increase the allocation of this site from 200 dwellings to 250 dwellings. It was decided that the allocation should remain at 200 dwellings and we see no reason that this should be increased to 220 dwellings, together with the additional element of the Care Home and the business units.

Vale of Evesham Civic Society Jan 2017