



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

FAO Gillian McDermott

Dear Gillian

Planning Application Ref 20/00938 and 20/00939 Reserved Matters, Land off Boat Lane, Abbey Road, Evesham

We wish to register our comments on the details submitted for the reserved matters relating to highway and drainage design.

The response from the Agents, David Lock Associates to my email comments of 22 May is appreciated and has helped to inform this formal submission.

It would have been very helpful if the Framework Plan, which forms part of the documentation submitted with the 2018 Outline application had been submitted with these two separate applications, as it provides the context for the layout of the highway and drainage schemes.

Despite the outline permission for this site and its indicative road layout, there is considerable concern about accessing the land north of Boat Lane all of the way from Abbey Road. Boat Lane is one of the historic routes of the town, aligned alongside Abbot Chyryton's wall. This wall was the northern boundary of the outer Abbey precinct and is a Scheduled Ancient Monument. There is an opportunity, now that the detailed highway scheme has been designed, to reconsider this aspect of the layout. By introducing a higher proportion of apartments and sheltered accommodation on the land to the north of Boat Lane, it would be possible to limit the number of cars associated with this block of housing and thus rely solely on access from Bewdley Street to the north. This would reduce the length of carriageway to be constructed and enable Boat Lane to remain open; this would allow the leisure traffic, especially for walkers and cyclists (including caravans – see below) to have easy access from the town centre. The proposed revision would also allow Abbot Chyryton's wall to be retained without risk to its integrity. The wall needs to be repaired and where it has been reduced to ground level a proper boundary feature designed to mark its alignment. The developer may not be prepared to commit to this repair and enhancement work, but if the line of the wall is preserved, it could then be taken on in the future by a local charity or community group.

The highway layout as proposed does not provide an adequate turn west into Boat Lane to accommodate the articulated traffic that will be forced to use this route if Boat Lane is closed. This traffic largely comprises cars towing caravans, to gain access to the riverside caravan site, but is also used by cars and trailers with boats/canoes etc. A plan has been submitted showing the swept paths for a rigid bus of 12m in length but it does not show a swept path around the corner into Boat Lane for a car and large caravan. This additional information should be submitted prior to any decision to allow



the submitted scheme to be approved, notwithstanding the comments in the paragraph above about retaining Boat Lane.

The drainage scheme, although referred to as a Sustainable Urban Drainage Scheme (SUDS) is the most basic version of such a scheme, relying on what appear to be pipes to connect the houses to three run-off lagoons. These run-off lagoons will provide very little landscape or ecology benefit, as they will need to be fenced off to prevent the risk of children falling into them and thus the risk of drowning. The fencing details must be requested at this stage, so that visual impact of this scheme can be fully considered.

The Flood Risk Assessment submitted with the outline application, prepared by Brookbanks, includes at paragraph 5.9 (a) the following:

*As source control measures generally rely upon the infiltration of surface water to ground, it is a prerequisite that the ground conditions are appropriate for such. **Site ground investigations specific to flood risk have yet to be completed** however published geology suggests the presence of potentially impermeable formations within the site. While the ground formations may not be possible for a wholesale infiltration based drainage strategy, where subsequent investigations show infiltration is viable locally to work, this may be incorporated into the design.*

The original investigations should have been followed by more ground investigations, so that the final design could incorporate infiltration elements, if the ground is suitable. Such elements enable vegetated soakaway channels to be incorporated into the housing layout, as the developers of the new housing estate to the west of Offenham Road have done. Such a solution is visually and ecologically better. Until it has been proven that the scheme submitted is the only option, the details should not be approved.

I have double checked the fees paid for each of these two applications and when entering the relevant information into the Planning Fee Calculator on the Planning Portal, the figure quoted is £462 per application. Perhaps this matter can be looked into again.

It is disappointing that these applications were not accompanied by any plans showing the development context for the details, leaving it up to respondents to search through to try to find the relevant information from the outline application documents.

I can be contacted on 07801 846049 or gillandken@pawsons.co.uk if any further information is required.

Yours sincerely

Gill Pawson
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