



Comments made on application W/25/02787/FUL by David Lloyd Leisure for permission for *Erection of health, fitness and racquets club, including three outdoor tennis courts within an enclosed air dome structure, three outdoor padel courts enclosed within a canopy, padel court social, indoor and outdoor swimming pools, outdoor multi use court, outdoor battle box exercise facility, external spa garden, child activity area, lounge facilities including a business hub and terrace, together with ancillary facilities, car parking, servicing, landscaping and associated works.*

On land at Evesham Country Park.

"On behalf of the Vale of Evesham Civic Society, please find attached a document setting out our serious concerns regarding the impact of this development on traffic to the locality, difficulties of travelling to the site by means other than vehicle and impact on the landscape.

We urge the Local Planning Authority to engage with the applicant to re-work the Transport Assessment to take account of the realities of the issues relating to this site, as it is apparent from the submitted document that the consultants had not visited the site and its surroundings.

We also request that the Landscape Impact Assessment is modified by the addition of some images showing the outline of the proposed built structures on the various views of the site, so that it we are better able to assess the visual impact."

18 January 2026



Planning Application by David Lloyd Leisure – W/25/02787/FUL
The Valley, Twyford Gardens, Evesham WR11 4DS
Proposed Health, Fitness and Racquets Club

Response by Vale of Evesham Civic Society

Comments on two of the submitted technical reports

Comments on the Landscape and Visual Impact Assessment:

- 1 Appendix 2 includes photographs taken at the identified viewpoints, with the extent of the development indicated on each photograph. It would be much more helpful in understanding the visual impact of the proposed development if the outline of the development were to be added to the close landscape views. This is easily done using a computer-generated model of the scheme and should be requested from the developer and an updated, revised document be made available for public consultation. At the moment it is VERY difficult to understand the extent and degree of the impact and it is not enough to rely on the written interpretation by the consultants.
- 2 It would also be helpful for the report to include some cross-section drawings, based on the topography, to be able to better understand the siting of the scheme.

Comments on the Transport, Access and Parking Assessment

1. **Multi-User Route.** In paragraph 3.14 it states that
The site will benefit from measures that form part of a s106 agreement for planning permission W/10/01376/OU (country park extension) including the construction of a Multi-User Route (MUR) to facilitate better connections to Evesham town centre. The s106 agreement allows for a two-part contribution for the MUR with the first contribution having been made by the owner(s) of The Valley Evesham and the second contribution yet to be made as circumstances which would trigger its payment are yet to occur

To be able to understand how the proposed development can be accessed safely by cyclists and pedestrians, it would be helpful if the extent and purpose of the s106 funds are explained. Where is the MUR due to go? How much is it likely to cost now? How much money is already in the kitty? In other words, how realistic is it to state that the site will benefit from this MUR?

No expenditure has yet been made from the s106 fund on improvements to create an MUR. It is likely that the arrangements made some years ago for s106 payments in conjunction with the permission for The Valley, would have been based on the cost of the scheme then. There will almost certainly be a shortfall if the MUR scheme were to go ahead now, due to inflation.



Conclusion: In the event that planning permission is to be granted, it should be made subject to a separate s106 agreement, to make available the necessary additional funding to allow the MUR to be constructed prior to the opening of the Leisure Club.

2 **Active Travel.** In paragraph 3.15 it states that

As such, it is considered that the existing and committed developments to support active travel within the vicinity of the site is sufficient to support the proposed development.

It is very difficult to understand how the consultants can come to this conclusion. There is no early prospect of the MUR (see comments above) and at present safe access to the whole area at Twyford Gardens for cyclists and pedestrians depends upon the use of very busy roads and their pavements and more specifically relies upon an 'informal' crossing of the very busy A46 dual carriageway where it joins the roundabout. Even for confident adults this is a daunting prospect, but for young people it is considered to be unsafe. We have to assume that the Club will want to attract young people as members, and many of them either do not drive or are too young to drive. A separate report on the footpath connection from town to the site is included in Appendix 1. It highlights the problems of using the only existing footpath connection and the lack of any provision for cyclists.

Conclusion: The existing access arrangements for walkers and cyclists is NOT sufficient to support this development.

3 **Buses.** In section 3.17 it refers to a bus stop on Greenhill, at the Abbotswood Road junction.

As stated, this is 1350m from the development site (0.84 miles) taking 16 minutes. The route to achieve this distance is not via off-road public footpaths, but on pavements beside busy highways. Not only does the route have to navigate the roundabout on the A46, (see comments in 2 above) but also the roundabout with the A44. See attached report in Appendix 1 on the feasibility and safety of this route.

Table 3.1 in the Transport Assessment itemises the bus services that the report puts forward as suitable for access by public transport to the application site. Only the No 28 has the potential to assist with access to the site; nobody booking use of the facilities by the hour at the Club is likely to be able to rely on a single daily service as provided by LMS Travel, especially when the service does not stop on Greenhill! Nor are they likely to use the Hedgehog Community Bus, with such a limited availability. It is therefore misleading to refer to any service other than the No 28.

Conclusion: Access by bus is severely limited due to the lack of facilities and the distance from a bus stop to the application site is a long walk.



In light of points 1 - 3 above, the Transport Assessment should be reworked taking into account the serious misrepresentation of the ability of the proposed site to be accessed by pedestrians and cyclists.

- 4 **Trains.** In paragraph 3.20 it refers to the existence of the railway station, which is even further away from the site, at 2.6km (1.8 miles).

This would take half an hour to walk. Not only would it not be feasible for pedestrians, but it certainly would not be feasible for those with impaired abilities. Not as stated in the paragraph, '*may not be feasible for those with impaired abilities.*

It is difficult to understand why any reference is made to services from London or Worcester Shrub Hill as anyone wanting to use the new Club facilities living along these routes would almost certainly drive, due to the difficulty of getting from Evesham Station to the Club.

In light of point 4 above, the Transport Assessment should be reworked taking into account the serious misrepresentation of the role of the rail service in providing access to the proposed site.

- 5 **Non-car customers.** In paragraph 5.7 it refers to an expected 25% of all arrivals at the site will be by means other than cars. It then goes on to assess the impact of the 75% of visitors who arrive by car. This information is based on visitors to other David Lloyd Clubs.

The applicant should be asked to supply information on the location of those clubs that have provided the data for this analysis. It is my experience that existing, well-established Clubs are in large towns, with good access by means other than a car. In this case, for a site proposed on the outskirts of a small town, it is far too generous to assume that a quarter of nearly 1500 visitors a day will arrive by anything other than a car. Also, the possibility of accessing the site by existing footpaths is negligible, as explained in the separate report in Appendix 1.

Conclusion: the calculations relating to impact of the traffic on the existing flows is likely to be a serious under-estimate. It is best practice in assessing traffic impacts to assume worst case. In this case all of the calculations in the report should be re-done based on 100% of visitors arriving by vehicle.

6. **Local Highway Network.** Detailed figures as calculated by the consultants are included in Tables 5.9 and 5.10. The traffic impact (table 5.10) is based on the traffic generation figures that in turn are based on the wildly ambitious assumption that 25% of all visits will be by non-car modes.

It has been shown in comments above that this is unrealistic for a facility in this location.

Conclusion: The traffic impact figures should be re-calculated based on 100% of all visits being by car, as this would give a worst case impact calculation.



In light of points 5 and 6 above, the Transport Assessment should be reworked using only data from Clubs that are located OUTSIDE a small town and assuming NO users travelling by foot or bicycle.

7. Holiday Complex. The report acknowledges the existence of outline planning permission (W/10/01376/OU).

Development comprising 60 lodges providing holiday accommodation with re-designed lake, additional Class A1 and A3 retail uses, plus Class D2 and sui generis uses, a new landing stage, environmental and landscaping improvements, additional car parking and associated infrastructure.

This involves in part, land now shown as the Country Park. However, no allowance has been made in the Transport Assessment for the DLL scheme for the likely traffic that the implementation of this complex could generate.

The transport report submitted with the outline application contained calculations of likely trip generation from the complex. On a weekday the generation was expected to be 2,996 two-way car trips i.e. 5,992 car movements and on a Saturday 5,192 two-way car trips or 10,384 car movements.

The traffic mitigation measures were based on improved pedestrian access upgrading existing public rights of way that avoid the need to cross or traverse the A46/A44, with upgrading of some for use by cyclists. The measures also include the potential to provide a bus service to the site. Despite the fact that this permission was implemented many years ago, none of the mitigation measures have been implemented.

Conclusion. As this outline planning permission has been implemented, this development could take place at any time, therefore these figures must be added to the calculations for the total impact of traffic onto the A46/A44 routes.

8. Parking at Peak times. Table 4.1 in the Transport Assessment shows the calculated arrivals and departures throughout the day, based on the calculations set out in section 5 of their report. Section 5 calculated traffic movements having first assumed that 25% of visitors would arrive by non-car modes.

Comments 2,3 and 5 and Appendix 1 seriously question this assumption for the site due to the severe lack of routes for walkers, cyclists and bus users.

Conclusion. Following the re-calculation of traffic based on 100% arriving by vehicle, the revised figures should then be used to re-calculate the parking requirements and the figures in table 4.1 on which the requirements are based.



Mitigation of the impacts of the proposed development.

1. The mitigation measures put forward in the outline application of 2010 for developments at The Valley must now be made a legal requirement of any permission for the proposed development.
 - a. Provision of a multi-user (walkers and cyclists) route from Evesham to The Valley and on to the application site, avoiding the use of paths within the highway corridors.
 - b. Provision of a bus service to and from Evesham into the The Valley.
2. A bridge over the A46 on the A46 on the north side of the A46/A44 roundabout

In addition, the suggestion made by one of the Civic Society's members for a bridge over the A46 should be considered. It would of course need a ramp access rather than steps to allow use by cyclists as well as pedestrians. It would improve access for those on the north side of Evesham, who would still need to use the rights of way alongside the highway access.



3. Improvement to the route through The Valley from the southern barrier to the north car park.

This stretch of road was not designed for use by heavy levels of car traffic. It is narrow and now has pot holes. The landowners, in conjunction with the developers must show a commitment to improving both the width and condition of this stretch of road.



A survey of the link to the town was undertaken on January 1st 2026 and photographs and text explain the problems of the existing infrastructure for walkers. There is very little provision for cyclists, who have to take their chance on the highway carriageway.

The following photographs illustrate the quality of the footpaths that would have to be used by walkers and cyclists accessing the site from town, the railway station and those arriving by bus to a bus stop on Greenhill near its junction with Abbotswood.

1. A typical view of the footpath on the west side of Twyford Bank as it slopes down to the roundabout with the A44. It would have been much wider in the past, but vegetation has become established, thus reducing the width.



2. On the approach to the A44 roundabout, there is a short stretch of path linking to the carriageway, to allow cyclists to access the footpath link to the crossing over the A44.



3. The crossing over the A44 is a formal arrangement of barriers and paving.



4. On the north side of the A44 a well surfaced path follows the B4088 on its west side. However, a no point is provision made for access from the footpath to link with a footpath on the east side of the B4088. It is therefore necessary to exit the footpath at the point shown on the image below and then walk south on the grass verge to a point opposite the crossing point.



Google Earth Image

End of central
barrier

End of Footpath

Crossing point

Footpath on east
side



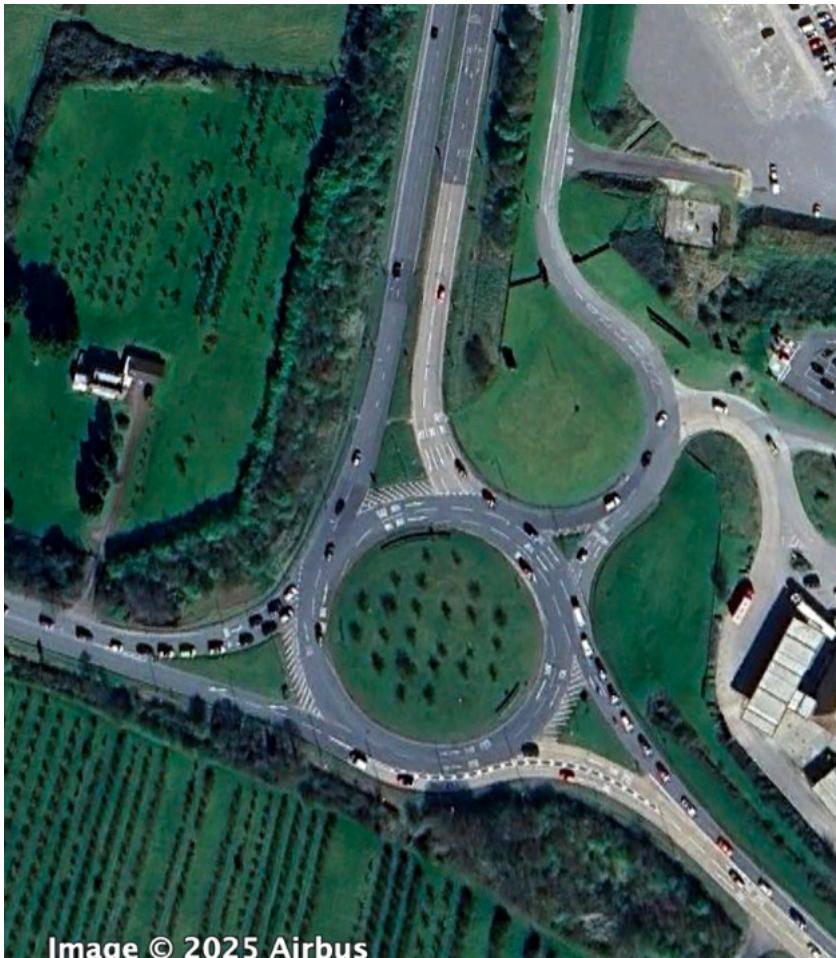
5. View looking south on the B4088, showing the grass verge area that has to be walked down before reaching the crossing point. The crossing is where the pedestrian is.



6. Having reached the east side of the B088 there is a path that follows the edge of the carriageway round to the dual carriageway A46; the following photographs show the path. On the approach to the roundabout, they show where vehicles have worn down where the verge, encroaching very close to the path. This is a major hazard to anyone walking on this path.



It must be recognised that the A46 is usually VERY busy. The photographs were taken on January 1st when there was very little traffic about. To cross over the northbound carriageway would have been very dangerous, as traffic swings around the roundabout at speed and is not expecting to find a pedestrian in the middle of the carriageway. On the southbound carriageway, at the crossing point, the carriageway widens to allow three lanes accessing the roundabout. At the crossing point, the traffic, although slowing down, has generally been travelling fast downhill and is not expecting to find a pedestrian in the middle of the carriageway.



Google Earth image

7. To avoid the problem of the lack of connection to the crossing on the B4088, pedestrians that are accessing The Valley and associated commercial outlets have worn a path on the south side of the A46 roundabout and in the verge along the A44 and along the east side of the B4184, as shown in the following photographs.



In conclusion, it is unreasonable to rely on the existing active travel infrastructure for 25% of the visitors to the proposed leisure facility arriving by means other than by car, for the following reasons:

- There is NO recognised and safe connection between the footpath on the west side of the B4088 and the short section on the east side.
- There is NO SAFE crossing point on the A46 dual-carriageway.
- The footpath in the north verge between the B4088 and A46 gets very close to the carriageway which in some places has been driven over by vehicles accessing the roundabout; this is a major hazard to anyone walking or cycling on this path.
- There is no cyclepath thus cyclists must use the main carriageway of the A44 and A46 which are very busy stretches of highway.