Statement of Objection to Application 14/00801 made by Swalcliffe Park Equestrian, to develop parking and a Change of Use of Land from Agriculture to a mix of Agriculture and Equestrian Use

on behalf of
Mr and Mrs R Grimston
Mr and Mrs M Vandamme
and Mrs M Boycott

CRITIQUE OF

TRANSPORT STATEMENT

BY

ALAN DAVIES OF DTPC

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SUMMARY

- The proposal is vague and unclear as to numbers. Events will attract significantly more traffic from jump judges, trade stands, judges and so on and the impact of this is unclear.

- The impact of the use of "28 day" permitted development rights cannot be assessed accurately. The presence of the permanent jumps and other infrastructure allows more intensive use without the need for so much site preparation. The whole of the competition area is not within the red line and traffic counts taken for the British Eventing Competition on 15 and 16 March 2014 show a significant increase in traffic. These are attached at Appendix C. Obtusely, the applicants' counts relate to a week in February 2012.

- The unauthorised access from Main Street has insufficient turning space as vehicles wait on the highway while the gates are opened.

- The roads in the area are a network of small lanes and are not suitable for a substantial volume of horse trailers or lorries.

- The upper section of Grange Lane is badly overrun. There are no passing bays. The siting of the new car park close to Grange Farm means greatly increased use of this section of the lane which results in an unacceptable severe impact.

- The lower section of Grange Lane (the Gated Road) is also badly overrun. It is this access, however, that is the least damaging approach enabling Sibford Ferris, Swalcliffe and Tadmarton to be bypassed. The overrun brings mud on to the highway which is also hazardous.

- Policy criteria at national and local level is breached.

- There is no safe and suitable access and the cumulative impacts of the development are severe (policy 32 – NPPF).

- The development will regularly attract large commercial vehicles onto unsuitable minor roads (policy TR7 – Cherwell Local Plan).

- The reference to *"Homezone"* is inappropriate because it is not a residential area where speeds are restricted to below 20 miles per hour. It is not relevant in the context of this application.

- The application of the 30 two way trip threshold for an assessment is misquoted and the guidance from the "Design Manual for Roads and Bridges" (41/95) is appropriate. It clearly states that a material increase is "*considered to be if the turning traffic flows, are result of the new development, would increase by 5 per cent of more".*

- As the traffic counts indicates the likely impact will be well above this level and well in excess of 500 cited in the applicants' transport statement.

- The proposed car park is too small to cater for the likely use and does not provide a means of access to the red line area.

Section 1

1. INTRODUCTION

Allen Rollings BSc (Hons) C.Eng MICE MCIHT has been appointed on behalf of the objectors to a Planning Application No. Application 14/00801 made by Swalcliffe Park Equestrian, to develop parking and a Change of Use of Land from Agriculture to a mix of Agriculture and Equestrian Use

In order to object to the application, this report provides information on the scope of traffic and transport planning aspects of the development proposals to assist in the determination of the planning application. In preparation of this rebuttal I have:

- visited and discussed the application with the objectors;
- read application documents, including the Transport Statement;
- visited and photographed the site;
- consulted with Judith Norris, following her visit to a medium size event (approximately 150 entrants) on 29th September 2013;
- visited the site during a smaller event (approximately 90 entrants) on Saturday 5th October 2013;
- Commissioned 4 automatic traffic counts, which recorded the traffic from Friday 27th September to Sunday 6th October 2013 inclusive and repeated them on 10th to 21st March 2014 when there were 460 competitors over on 15th and 16th March 2014.

Section 2 of this statement specifically deals with the matters raised in the Transport Statement by Alan Davies of DTPC and uses in italics the statements contained therein followed by matters of concern. This document should be read in conjunction with Mr. Davies' Transport Statement.

Following this in Section 3 additional information is added along with a general summary and conclusion.

The Transport Statement submitted with this application is very similar to that submitted with the previous planning application 13/01295 and many of the paragraphs have just been restated where appropriate.

Section 2

Their Introduction

DTPC has been appointed on behalf of Swalcliffe Park Equestrian Ltd to progress a planning application for the change of use of land at Grange Farm for mixed use comprising equestrian training/competitions (Use Class D2) and agriculture, together with extension of existing vehicle parking area.

It is clear that the application is for training and competitions and therefore one would expect to see information that would allow the Planning Authority and Highway Authority to accurately assess the impact of the additional traffic to be imposed on the unsuitable roads in the vicinity of the application site for 7 days a week.

Competitions with up to 50 competitors generate additional traffic from spectators, officials and those involved in providing facilities such as first aiders and caterers.

I observed the above first hand when I attended a small competition on the 5th October 2013.

The Transport Statement supplied by Alan Davies dated 14th May 2014 does not address this. He refers to historic, incomplete data reliant on entries only, taken from a week's traffic count in February 2012.

"2. NATIONAL AND LOCAL POLICY GUIDANCE"

Whilst reference is made to various policies, issue is taken with paragraph 32 of the NPPF under the Heading "Promoting sustainable transport" as follows:-

- *"safe and suitable access to the site can be achieved for all people;"*
- *"improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.* ***Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe "***

It is considered that this Policy does prevent the proposal from being approved. The increase in traffic and unsuitable roads does not give safe and suitable access to the eventing site and results in the residual cumulative impact of the development being **very severe**.

This is supported by policy TR7

"Development Plan: Cherwell Local Plan (1996)

Policy TR7 'Development attracting traffic on minor roads'

DEVELOPMENT THAT WOULD REGULARLY ATTRACT LARGE COMMERCIAL VEHICLES OR LARGE NUMBERS OF CARS ONTO UNSUITABLE MINOR ROADS WILL NOT NORMALLY BE PERMITTED.

In order to protect the amenities of the plan area, and in the interests of highway safety, development likely to create significant traffic flows will normally, subject to consideration of the other policies in this Plan, be expected to have good access to the major through routes or County inter-town routes identified in the Structure Plan or other principal roads".

It is correct for the Transport Statement to state:-

"Policy TR7 is intended to safeguard against an adverse impact from excessive or inappropriate vehicles using minor country roads as a result of new development proposals."

It is not agreed that the Transport Statement has proved the traffic impact of the day to day activities of the development is insignificant and therefore has no adverse impact.

The daily figure of 50 students equalling 100 trips will have a significant impact on the weekday/weekend average use of Grange Lane which has a daily weekday average of 291 thereby giving a significant increase of 100/291 x 100% = 34% this assumes that the horseboxes approach from the northwest Main Street as this is the shortest route to the major highway network.

"Summary

The overriding theme of national policy is that developments should be accessible by sustainable means of transport and accessible to all members of the ***local community relative to the location*** *of the attraction.*

The proposed development will promote sustainability by shared trips or multi occupancy vehicle use to help reducing the number of car trips to the site."

The application refers to a site in the countryside and relies on the car and horsebox transportation, either by 4 x 4 and trailer or horseboxes. It is not clear how the proposed development will promote sustainability by shared trips or multi-occupancy as events of this nature usually attract entrants from locations over a large area and each entrant usually requires their own transport.

2. "SITE DESCRIPTION

Site location context

The proposed development site is located to the west of Banbury (approximately 5 miles from the town centre). The site is located to the north east of the A361, east of the A3400 and south of the A422 which links the area to the wider network"

The description above makes no mention of the local approach roads. The nearest classified road is the B4035 which requires access either through the Village of Swalcliffe and Tadmarton from the east or through several other villages from the west and north. Ater passing through relatively minor roads that link Sibford Ferris and Swalcliffe the route has to pass along an unclassified and narrow road known as Grange Lane which is a 2.5m wide country lane from Main Street in the north to the site (a length of .94km) with only one passing bay and to Wigginton Heath in the south via Park Lane once again with only one hardened passing bay on the whole of its length of 2.15km.

The plans of the site location in the Transport Statement clearly identify that it is remote from the major highway network.

The larger aerial photograph gives a misleading demarked area of the site and claims in the following statement:-

"The site forms the existing field and parking area which will be used for shows and day to day training activities. It sits within a wider agricultural offer owned by the Park.."

The area coloured red in this application only covers less than 50% of the area used for the Cross Country Course. It therefore raises the question of the actual size of the operation being proposed and the accuracy of traffic predictions.

Additionally the new proposed lorry parking area where horses will be unloaded is not connected to the larger upper field site, therefore requiring horses to use Grange Lane or indeed the Upper Gated Road to reach the site which is dangerous.

"Local Highway Provision

All the roads in the area are of a standard carriageway width appropriate for their limited usage/access provision and locally all are national limit applies i.e. 60mph.

The area based on an ATC survey on Grange Lane and from observation has a typical trafficflow and speed charateristic associated with an uncongested rural area i.e. distinct AM and PM flow periods."

It is not clear what is meant by a "standard" carriageway width as an A road is normally 7.3m wide and a B road 6.1m wide, the unclassified Grange Lane and Park Lane are only generally 2.5m wide thus not allowing any passing of cars let alone horseboxes or commercial vehicles.

The applicants' transport statement does not superimpose the proposed 100 horsebox trips a day and associated additional support cars for training or spectators, officials and those involved in providing facilities such as first aiders and caterers at events on the Volumetric Graphs in the Transport Statement. These would show a significant increase of traffic and with 85%ile speeds within the range of 32-35mph. There is only one passing bay on the length of Grange Lane which is 0.95km, and this would appear to create a serious safety hazard. For unrestricted daily use this would surely create a **very** severe safety hazard on these narrow and unsuitable minor roads.

"Clearly the flows are low and the speeds significantly less than the posted speed limit."

There is no posted speed limit only a sign stating the road is unsuitable for heavy vehicles (such as large horseboxes). The National Speed Limit being 60mph cannot be reached on this narrow road due to its poor condition and lack of forward visibility. Speeds of over 30mph could well be considered

inappropriate and even dangerous as approaching large horseboxes cannot be seen in several places.

"Grange Lane access route"

The photos of this junction in the Transport Statement illustrate quite clearly that Grange Lane is unsuitable for large horseboxes and for cars to pass one another. The verges have been severely overrun beyond the 2.5m tarmac road and the Highway Authority have reinforced this issue by imposing a 7.5T limit on the road, See photo below.

North End of Grange Lane Showing 7.5T Weight Limit Sign

The views left and right from the current field access part-way down Grange Lane are also insufficient. The photos below illustrate that the whole lane is subject to verge encroachment and damage to the edge of the carriageway. It is also contended that this road is well used by local equestrians and walkers accessing the local bridleway and footpath network.

View of the damage on Grange Lane

View of the damage i

on Grange Lane

With the use of an enlarged park for Lorries at Grange Farm, this route will be used by large horseboxes during wet and indeed wintry weather conditions when these verges will become slippery and even more dangerous especially as speeds have been recorded over 30mph.

"The route has evidence of haunch over run into the verge, there are significant areas that have been strengthened by stone and during the summer months the overrun is lessened as the weather has an impact on the effects of overrunning"

The above statement is misleading as the application is to allow all-year all-weather use of the site.

"View to and from the junction with Park Lane"

The photos in the Transport Statement illustrate the narrowness of the approach lanes to Grange Farm which is to be the site parking area for day to day use.

"Park Lane route

This route extends from the Park south eastwards to the Wigginton Heath junction where the connecting route runs east west from the A361 in the east to the A3400 in the west.
It is again a narrow route with widened areas and passing bays. It has a 7.5t weight limit order on it restricting the size of vehicle to the road layout."

First of all this route is known as the Gated Road South and once again the description of the route is misleading as Park Lane connects in the north to the B4035 and not to the A-road network (the A361 mentioned is at least 3 miles to the east) and to the south it connects to a C/ Unclassified-road network around Wigginton before reaching the A3400 which is at least 7 miles to the west.

It is true that this route is also classified by the Highway Authority as unsuitable for heavy vehicles as at each end there is a 7.5T weight limit. (See the Photos in the Transport Statement) The road is 2.5m wide generally with only one sub-standard tarmac passing place south of Grange Farm on its length. Nevertheless, with its relatively undeveloped status and space next to arable fields with no hedges, passing bays could be provided in this section of road.

Mid-Way down Park Lane

(Some maps refer to this as a continuation of Grange Lane)

Close to the Southern End of Park Lane

It is accepted the other option using Park Lane from Swalcliffe is unsuitable.

Weight Limit Signs at the Top of Park Lane

"Main Street secondary access route

Main Street along the north of the land ownership has a field access that gives access to the top fields for secondary parking needs using a mat strengthen track."

The photos in the Transport Statement show this access onto what has been previously called the" 28 Day Field" but is now the application site. This has gateway has been developed without planning permission and provides insufficient turning space so vehicles straddle the highway to gain access to the fields. It is the main entrance used for horseboxes and cars for the competitions. Whilst the hedges in the photo contained in the Transport Statement were taken in the winter, the photos on 5th October 2013 shows there is restricted visibility for those exiting the site.

Visibility to the right from the 28 day Field Access

Visibility to the left from the 28 day Field Access

During the day it was observed that there was no traffic management on the gate and the drivers or passengers of the horseboxes and cars entering and leaving the site had to alight and open and close the gate themselves and the photos below show the obstruction that was occasionally caused by this operation. This would obviously be exacerbated during larger events.

Vehicles approaching from the East along Main Street Blocking the Highway whilst the Passenger opens Gate

Vehicles exiting to the West along Main Street Blocking the Highway whilst the Passenger closes the Gate

"Safety review along frontage"

It is noted that the Transport Statement addresses the historic accident records for the last 3 years however this application seeks permission to have a significant increase in the number and frequency of events on the site and there is no estimation of how this might affect the accident rate.

"Summary
The local network is rural in nature, has few recorded accidents but none in the area of the site access and speeds observed much less than the posted limit. There are no link capacity issues."

It is accepted that the local network is rural in nature and has few recorded accidents but whilst the speeds recorded are less that the 60mph National Speed Limit, due to the narrow nature of the road and lack of visibility, speeds of 30mph are considered to be excessive.

It is challenged that there are no link capacity issues as all the roads approaching Grange Farm are suitable for one-way traffic only with no intervisible passing places and the proposal intends to increase traffic by a significant percentage.

"4. EXISTING EVENT AND TRAINING OPERATION"
"……Within the space set out there were a number of recognisable areas of land which would almost be exclusively to equestrian use.

The facility at SPE will consists of the cross country course comprising of a number of portable jumps, two separate water complexes, an 80m x 80m grass 'arena' as well as a number of grass dressage arenas. The site will also provide a modest area

of car parking on land immediately to the north of the Grange Farm complex and for any larger events / rallies, overspill temporary car parking would be provided on the free draining grass. The grassland is able to host cross country courses up to 2,500m in length.

It is obvious that some areas of the land are already set aside for equestrian use without Planning Permission. The use of the land coloured red will facilitate many more 28 day events within a year, perhaps enabling one every two weeks and possibly every week in the summer period which will generate an excessive amount of traffic on the local roads as illustrated in my previous Transport Statement to be found in Appendices B and C.

"Day to Day training
To aid in the appreciation of the existing approved uses of the number of attendees over the 2012 period has been recorded and provided overleaf."

"During a normal month the area has an average of 16 attendees per event with a minimum of 2 and maximum of 77.
The day to day schooling activities across the same time period had some 338 attendees over 11 months averaging 30 per month or 1 per day with a maximum of 68 in one month.
The activities are accessed by the two designated routes, assuming a 50/50 split for direction the busiest day would be 77/2 or 38 attendees per route and the average 16/2 or 8 per route. Most attendees are via a horse box or trailer which can accommodate more than one pony/horse however to be robust they are treated as individuals.
These flows are over a day period for in/out and across an AM period for the actual movements in a peak.
All these activities, including all necessary vehicle parking occurs within the core area used by SPE to the north of Grange Farm"

The information does not predict the future use if the proposal with permanent facilities were to be allowed. The application seeks everyday use by 50 participants but does not take into account the spectators, officials and those involved in providing facilities such as first aiders and caterers etc required for competitions.

"March 2007 GTA sets out that: *"For the avoidance of doubt, the 1994 Guidance regarding the assessment thresholds of 10 percent and 5 percent levels of development traffic relative to background traffic is no longer an acceptable mechanism...."*.
However, GTA does suggest that a threshold of 30 two-way trips may be appropriate for identifying the level of impact below which the need for a formal assessment may not be needed. Indeed, it is generally the HA's approach to apply the 30 two-way trips threshold as that below which operational assessments are not required for the

trunk road network. It is concluded that, in the specific case of this TS, and the absence of any other guidance, the '30 two-way trip threshold' should be adopted as the basis of a materiality test of traffic impact for the study junctions."

Mr Davies is misquoting the GTA as the 32 way trips threshold relates only to the starting point for discussion on whether the Transport Assessment is required (See Below)

2.11 Appendix B provides suggested thresholds below which a formal assessment may not be needed, and above which the preparation of a TS or a TA would be appropriate. The thresholds in Appendix B are based upon scenarios which would typically generate 30 two-way peak hour vehicle trips. Whilst there is no suggestion that 30 two-way peak hour vehicle trips would, in themselves, cause a detrimental impact, it is a useful point of reference from which to commence discussions.

Mr Davis States:

"The two way trips from the existing use are on average well below the threshold and only occasionally at the threshold. This would be lessened as the max figure would be capped at 50.
The proposal would therefore have little or no discernible impact on the local network other than the roads are single track roads with passing bays"

It is disputed that the 2-way trip threshold can be applied in this case as a 5% significancy level is retained in the "Design Manual for Roads & Bridges" and this is more appropriate as set out below:

Extract from the Design Manual for Roads and Bridges

Vehicular Access to All-Purpose

Trunk Roads TD 41/95

2.10 Any application which results in a material increase in the volume of traffic or a material change in the type of traffic entering or leaving a trunk road shall be carefully considered. **Generally, a material increase is considered to be if the turning traffic flows, as a result of the new development, would increase by 5% or more**, although there may be cases when it is important to consider smaller increases. For England, this is discussed more fully in Annex B of **Planning Policy Guidance Note 13**

(1994), and for Wales in Appendix A of **Planning Policy Guidance Note 13 (1988).**

It is considered that the level of additional traffic will be well above this level. It is therefore challenged that the additional traffic will have "little or no discernible impact on the local network".

"Reference to Manual for Streets (MFS), Traffic Advisory Leaflet 2/04 and homezone guidance for narrow sections with passing bays is provided below."

"Homezone" advice applies to a residential area where speeds are to be restricted to below 20mph. The application site is in a rural area with no provision for cyclists or pedestrians and speeds have been recorded to be in excess of 30mph. This advice then should be completely disregarded.

The Department of Transport Traffic Advisory Leaflet 2/04 states that passing bays should be provided with spacings no greater than 60m and have a minimum length of 3 cars. In order to prevent excessive delays the two way flow should not exceed 300 vehicles per hour.

Both Grange Lane and Park Lane do not meet this criterion and in fact are dramatically deficient in passing places as is evident by the damage to nearly all the verges along the route. The proposals do not include a scheme to mitigate this situation and therefore the roads must be considered to be extremely unsuitable for the proposed use. If it is proposed to access the site from Main Street and Grange Lane the conclusion in my 2013 Traffic Report concluded that the levels of traffic could only be accommodated if the lane was widened.

My alternative suggestion of an access near Lodge Farm and use of the Southern Gated Road with passing bays could be a way round the unattractive proposal to widen the northern section of Grange Lane.

The Transport Statement says:

"There is anecdotal evidence that similar routes can achieve 500 two way flow per day without causing undue stress where there are intermittent passing bays. Furthermore, TAL guidance suggests that 300 vehicles per hour are acceptable with a well designed system.
The layout of routes and flows they accommodate suggests they are capable of safely accommodating much higher flows of traffic than might be generated by the existing flows.
Clearly the day to day flows are significantly less than the above i.e. maximum in peak of 38 per hour 13% of the possible capacity for a single track road or 38% using the homezone assessment.
It is considered that there are no capacity issues arising from the volume of vehicles surveyed."

It is not sure why this statement applies as **there is no proposal** to implement a comprehensive scheme/system of passing bays and as a consequence it is considered that there is a large capacity issue arising from the volume of vehicles surveyed.

"5. THE PROPOSALS AND LAYOUT

Development Proposals

*"The planning application does **not** seek consent for the use of any land outside of the application boundary, nor does it seek consent for any of the limited larger events, where the maximum number of riders exceed 50 in any one day. It is seeking to accommodate the expected use and the anticipated increase. In this respect, the records kept by the business demonstrate that the 50 riders/day cut off point covers the vast majority of the activities at SPE and the application site covers the land required to cater for the day to day usage."*

It is evident from the above statement that for 50 riders for the every day events it is intended that the operations will be kept within the area coloured red. From observations made on the site visits of both the 29th September and the 5th October 2013 where entries are assumed to be over the 50 level, the whole of the "28 day field" and Top Field used for the competition and parking. The photos below show part of the area of this application, however the whole event used land to the east and northeast which is outside the area coloured red and will potentially generate more activity:-

Parking on 28 day field

Parking on 28 day field

Commercial Element using 28 day field

View of Loud Speaker Box at Top of 28 day Field

The Transport Statement comments:

This level of usage, contained within the application site, will help to ensure that the impact of the development is limited and in fact through the changes now proposed, is reduced from the present.

This is a bold statement and there is no evidence in the Transport Statement to support it. It goes on to say:

For the very large events, where areas outside of the application boundary are to be used for equestrian purposes and/or where the number of riders exceeds 150 in any single day, the applicants / operators will rely upon the rights afforded by the Town and Country Planning (General Permitted Development) Order 1995 Schedule 2 Part 4 Class B which permits the use of the land for any purpose for up to 28 days in any calendar year.

The traffic counts in March 2014 show the increase in traffic to be significant. These are shown on the table at Appendix C.

Layout

The larger scale plan shows clearly that the area coloured red encroaches close to the neighbouring properties on the north, west and south of the site and therefore the daily activities of events and training will utilise this area and

bring the carparking and lorry movements unacceptably close to their properties

"Access and car parking

Vehicle Parking *: For the daily training needs the existing car park to the side of the livery yard will be utilised as now to cater for the smaller number of horse boxes etc. For the minor events held across the year which do not need the 28 day rule process i.e. the current event situation an additional area of parking is proposed to the west.*

The area set out equates to approximately 10 horse boxes per side, 20 in total. This in addition to the existing area here where around10 boxes can be parked.
The extended parking areas will be surfaced in blinded road planings, a common method of providing a permeable hard surface in countryside locations. The proposed parking area is of a scale consistent with the anticipated maximum parking demand for the larger regular events taking into account the size of the vehicles involved and the need for adequate space to open doors / ramps and manoeuvre horses within the area

This proposal is for a site with a significant change of level. It is estimated that on the 5th October for a relatively small event 37000sq m of the 28 day field was used for parking (See photos above). It is therefore once again contended that the application site would need a larger area to accommodate the necessary parking required for small events. The environmental impact upon the neighbours of parking for all events on the application site must be taken into consideration.

Internal Access Road *:*

In the previous application there was the intention to build an internal access road linking the two areas coloured red in this application. It appears that this has been overlooked with its obvious safety issues of taking horses/ vehicles onto the road. Vehicles will also be tempted to park on the verges of the lane as was photographed below on the 5th October visit.

Impact during Construction

The delivery of materials to and from the site will form a large component of the traffic generated by the construction process. A routeing strategy will be developed closer to the time of construction, based upon the principle of using appropriate roads.

This critique/ rebuttal has highlighted the problem that there are **no** appropriate roads to approach the site.

"6. LARGER EVENTS

In addition to the normal events and training, the school also holds a number of larger shows and events. These occur across a wider area of the land owned by the applicants and as such are restricted by the operation of the planning system and the "28 day rule."

Although this application does not specifically address the 28 day traffic figure impact the evidence compiled to object to the previous application is still considered to be relevant, The traffic counts were taken at locations in plan in Appendix A and a summary of the results are shown in Appendix B in my previous critique against the Transport Statement contained in Application No 13/01295. At Appendix C are the counts for the 10-21 March 2014.

The traffic figures summary shown in **Appendix B** for a medium size event on the 29th September shows an overall increase in traffic on all 4 sites as being 657 trips ie 2-way traffic. In the aforementioned summary, the additional traffic on section 4 ie approaching from the south on Park Lane was 62 + 47 = 109 trips and therefore the percentage of overall traffic coming from the south is only 109/657 = 17%. Although not strictly accurate, it would appear

that the planning application proposes that on event days such as that held on Sunday 29th September, all this additional traffic would enter the new entrance in Grange Lane or via the entrance in the southeast corner of the yard, all requiring the use of Grange Lane and Park Lane, and this would then mean that 657 – 109 = 548 vehicles would use this lane over and above the normal Sunday traffic.
The non-event day traffic on Section 3 (Grange Lane) on a Sunday was recorded on the following Sunday 6th October when no events were taking place and it was recorded that the two way traffic was 130 + 138 = 268 vehicles using that road. Therefore the additional traffic on an event day using Grange Lane would be the above plus the calculated traffic attending the event recorded as 548 vehicles.

The total two-way flow on Grange Lane north of the proposed access would therefore be 268 + 548 = 816; this is far in excess of the 500 two-way traffic flows mentioned in the TAL and this level assumes a passing bay scheme in operation, which of course there is not one proposed.

This calculation shows that the proposal for events for around 50 and above using the suggested routing around the area coloured red is totally unacceptable on the current unsuitable roads and would also need a larger improvement in Grange Lane than just a passing bay scheme.

*"**7. SUMMARY***
The scheme accords with local and national policy to ensure safe access is provided and that any residual impacts are not deemed severe following the use of the events management plan."

This is challenged as the roads are unsuitable and the resulting residual impacts will be severe.

"The layout accords with good practice."

This is challenged as the proposed car-park does not appear to be large enough and the operation of entry and exiting will result in an unacceptable level of traffic using Grange Lane and Main Street

"Traffic flows have been assessed for up to date levels, the location has no capacity issues based on a robust view of the flows and no capacity issues are expected to arise."

It is challenged that the traffic flows have been assessed correctly as the traffic counts organised by the writer of this report, indicate that the generated

traffic for the up to 50 entrants along with spectators, officials and those involved in providing facilities such as first aiders and caterers etc will have a significant effect on the normal day to day flows. The impact of larger events, ie in excess of 50 these are not addressed within the Transport Statement. There **are** capacity issues that need to be addressed

"As such the scheme would have little or no impact on the local network for the day to day approved uses"

It is also in doubt that the 50 day to day limit could be accommodated on the unsuitable access roads as there is already an average normal weekday two-way traffic flow of 145 + 148 = 293 on Grange Lane and the additional approximate say 250 trips made by the extra proposed horseboxes along with spectators, officials and those involved in providing facilities such as first aiders and caterers etc would be a ***very*** significant increase. A calculation carried out at the weekend, using weekend traffic would produce a similar result albeit the recorded weekend traffic flows shown in **Appendix B** appeared to be affected by the additional set-up or clear up traffic from the events.

"As such it is considered that there are no reasons why the scheme should not be approved from a transportation point of view, the residual impacts are not considered severe as per policy but low level/minor in nature."

This is obviously challenged by this report and it is expected that the Highway Authority will at the very least raise a holding objection once this information is considered by them.

CONCLUSION

There are serious problems with the existing local highway network as all approach roads to the site are sub-standard and have suffered severe damage which could possibly have been exacerbated by the equestrian use of the application site.

The additional traffic generated by events and training of up to 50 entrants a day would in my opinion generate many more trips a day on the local roads far in excess of a 5%increase considered by the DoT as "significant". This increase can only be accommodated by highway improvements on these rural lanes which would also, in turn have an environmental impact which needs to be considered.

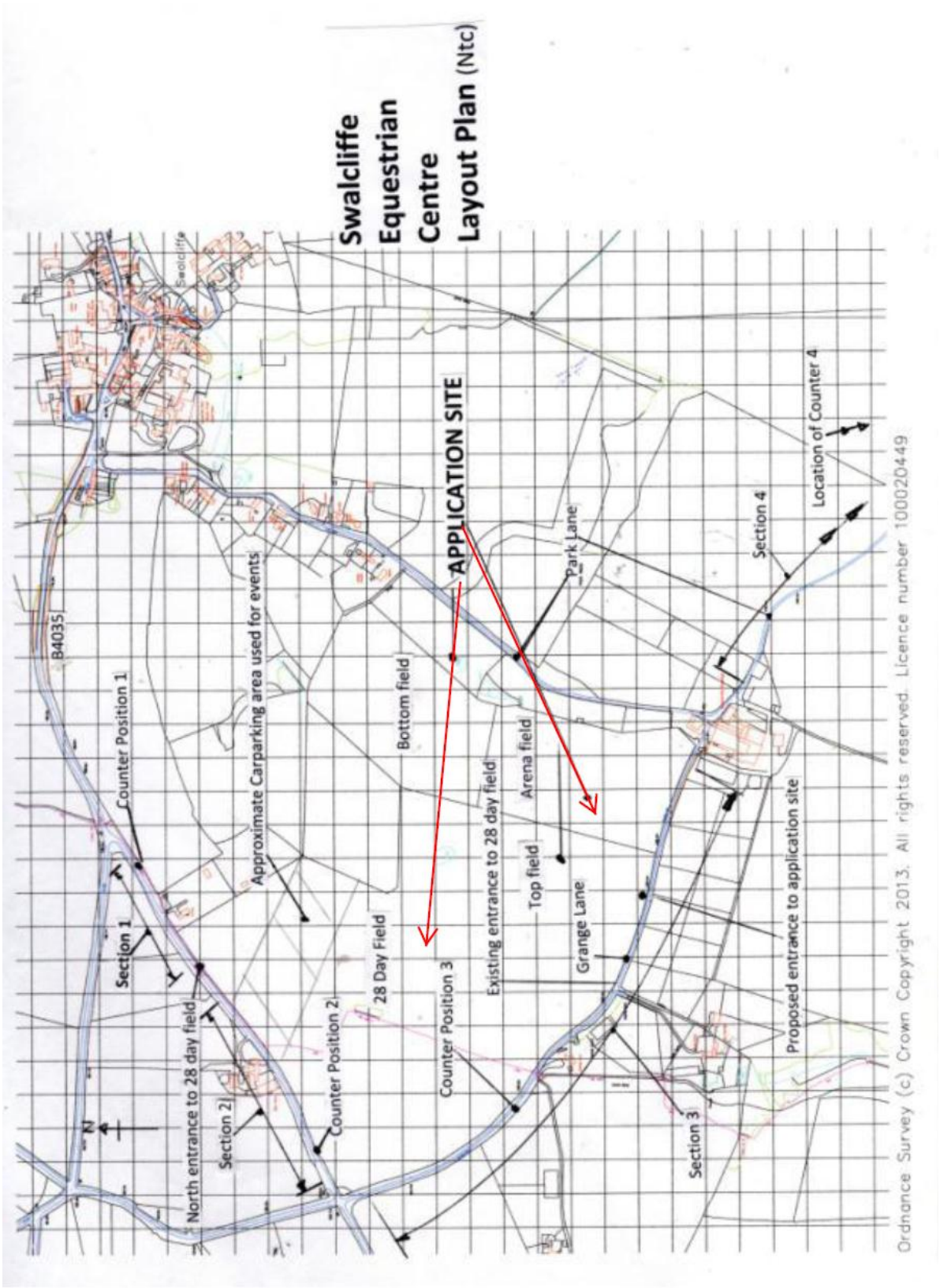
There appears to be some considerable confusion over the application area as it appears that for the events where up to 50 entrants are to be expected the whole of the equestrian site outside the area coloured red would be used and therefore requiring a larger scale assessment of the entrances, parking areas and access roads.

The Highway Authority would need to consider in detail the missing elements in the Transport Statement by Alan Davies.

I would therefore recommend that a Holding Objection be made until mitigation for the increased traffic is proposed as I believe that the residual cumulative impacts of development are severe.

…End of Critique…

APPENDIX A LAYOUT PLAN



APPENDIX B TRAFFIC COUNT SUMMARY AND CALCULATIONS

Traffic count summary between 27th September & 6th October inclusive

And calculations of additional traffic on event days

Day & Date	Section 1 SW-Bound	Section 1 NE-Bound	Section 2 SW-Bound	Section 2 NE-Bound	Section 3 NW-Bound	Section 3 SE-Bound	Section 4 NW-Bound	Section 4 SE-Bound
Fri. 27th Sept	371	388	374	383	137	129	151	159
Sat. 28th Sept	318	313	313	304	130	131	141	142
Sun.29th Sept EVENT DAY	**376**	**362**	**355**	**342**	**184**	**154**	**192**	**177**
Mon.30th Sept	351	368	358	360	153	148	152	161
Tues 1st Oct	393	399	399	398	167	152	173	162
Wed.2nd Oct	426	420	438	419	138	168	150	175
Thurs 3rd Oct	399	429	404	404	125	141	133	156
Fri. 4th Oct	416	495	439	428	154	152	158	159
Sat 5th Oct EVENT DAY	**343**	**348**	**379**	**372**	**147**	**137**	**131**	**128**
Sun 6th Oct	256	229	250	222	130	138	130	130
Sat 5th Oct EVENT DAY	343	348	379	372	147	137	131	128
Non Event Day Sat. 28th Sept	318	313	313	304	130	131	141	142
Increase traffic	**25**	**35**	**66**	**68**	**17**	**6**	**-10**	**-14**
Sun.29th Sept EVENT DAY	376	362	355	342	184	154	192	177
Non Event Day Sun 6th Oct	256	229	250	222	130	138	130	130
Increased traffic	**120**	**133**	**105**	**120**	**54**	**16**	**62**	**47**

Section 1 - 4 represents the traffic figures in each direction shown on plan in Appendix A and counted at Positions 1 – 4.

Worst increase in traffic generation is shown on Sunday 6th October and calculated as follows:-

120 + 133 + 105 + 120 + 54 + 16 +62 + 47 = 657

Traffic count summary between 27th September & 4th October inclusive

In order to work out weekly daily average on all sites

Day & Date	Section 1 SW-Bound	Section 1 NE-Bound	Section 2 SW-Bound	Section 2 NE-Bound	Section 3 NW-Bound	Section 3 SE-Bound	Section 4 NW-Bound	Section 4 SE-Bound
Fri. 27th Sept	371	388	374	383	137	129	151	159
Mon.30th Sept	351	368	358	360	153	148	152	161
Tues 1st Oct	393	399	399	398	167	152	173	162
Wed.2nd Oct	426	420	438	419	138	168	150	175
Thurs 3rd Oct	399	429	404	404	125	141	133	156
Fri. 4th Oct	416	495	439	428	154	152	158	159
6 day totoal	2356	2499	2412	2392	874	890	917	972
Ave Weekday	**392**	**416**	**402**	**398**	**145**	**148**	**153**	**162**

APPENDIX C TRAFFIC COUNTS FOR THE BRITISH EVENTING COMPETITION 15 AND 16 MARCH

COUNTER POSITION 1
COMPARISON OF 2013 2014 EVENTS

Day & Date 2013	Day & Date 2014	Section 1 SW-Bound	Section 1 SW-Bound	Section 1 NE-Bound	Section 1 NE-Bound
	Mon 10th Mar		360		371
	Tues11th Mar		388		394
	Wed 12th Mar		402		426
	Thurs13th Mar		450		432
Fri. 27th Sept	Fri 14th Mar	371	455	388	430
Sat. 28th Sept	Sat 15th Mar	318	629	313	589
Sun.29th Sept EVENT DAY	Sun 16th Mar	**376**	**491**	**362**	484
Mon.30th Sept	Mon 17th Mar	351	394	368	405
Tues 1st Oct	Tues 18th Mar	393	400	399	408
Wed.2nd Oct	Wed 19th Mar	426	412	420	427
Thurs 3rd Oct	Thurs 20th Mar	399	427	429	440
Fri. 4th Oct	Fri 21st Mar	416	419	495	742
Sat 5th Oct EVENT DAY		**343**		**348**	
Sun 6th Oct		256		229	
Sat 5th Oct EVENT DAY	Sat 15th Mar	343	629	348	589
Non Event Day Sat. 28th Sept		318	-318	313	-313
Increase traffic		**25**	**311**	**35**	**276**
Sun.29th Sept EVENT DAY	Sun 16th Mar	376	491	362	484
Non Event Day Sun 6th Oct		256	-256	229	-229
Increased traffic		**120**	**235**	**133**	**255**

COUNTER POSITION 2

COMPARISON OF 2013 - 2014 EVENTS

Day & Date 2013	Day & Date2014	Section 2 SW-Bound	Section 2 SW-Bound	Section 2 NE-Bound	Section 2 NE-Bound
	Mon 10th Mar		376		357
	Tues11th Mar		390		384
	Wed 12th Mar		400		407
	Thurs13th Mar		445		424
Fri. 27th Sept	Fri 14th Mar	374	448	383	416
Sat. 28th Sept	Sat 15th Mar	313	535	304	502
Sun.29th Sept EVENT DAY	Sun 16th Mar	**355**	**459**	**342**	446
Mon.30th Sept	Mon 17th Mar	358	385	360	396
Tues 1st Oct	Tues 18th Mar	399	391	398	378
Wed.2nd Oct	Wed 19th Mar	438	414	419	423
Thurs 3rd Oct	Thurs 20th Mar	404	420	404	426
Fri. 4th Oct	Fri 21st Mar	439	416	428	547
Sat 5th Oct EVENT DAY		379		**372**	
Sun 6th Oct		250		222	
Sat 5th Oct EVENT DAY	Sat 15th Mar	379	535	372	502
Non Event Day Sat. 28th Sept		313	-313	304	-304
Increase traffic		**66**	**222**	**68**	**198**
Sun.29th Sept EVENT DAY	Sun 16th Mar	355	459	342	446
Non Event Day Sun 6th Oct		250	-250	222	-222
Increased traffic		**105**	**209**	**120**	**224**

COUNTER POSITION 3

COMPARISON OF 2013 - 2014 EVENTS

Day & Date	Day & Date2014	Section 3 NW-Bound	Section 3 NW-Bound	Section 3 SE-Bound	Section 3 SE-Bound
	Mon 10th Mar		111		123
	Tues11th Mar		128		130
	Wed 12th Mar		121		128
	Thurs13th Mar		131		132
Fri. 27th Sept	Fri 14th Mar	137	147	129	149
Sat. 28th Sept	Sat 15th Mar	130	199	131	205
Sun.29th Sept EVENT DAY	Sun 16th Mar	**184**	**186**	**154**	**214**
Mon.30th Sept	Mon 17th Mar	153	147	148	162
Tues 1st Oct	Tues 18th Mar	167	146	152	141
Wed.2nd Oct	Wed 19th Mar	138	173	168	173
Thurs 3rd Oct	Thurs 20th Mar	125	129	141	171
Fri. 4th Oct	Fri 21st Mar	154	153	152	164
Sat 5th Oct EVENT DAY		**147**		**137**	
Sun 6th Oct		130		138	
Sat 5th Oct EVENT DAY	Sat 15th Mar	147	199	137	205
Non Event Day Sat. 28th Sept		130	-130	131	-131
Increase traffic		**17**	**69**	**6**	**74**
Sun.29th Sept EVENT DAY	Sun 16th Mar	184	186	154	214
Non Event Day Sun 6th Oct		130	-130	138	-138
Increased traffic		**54**	**56**	**16**	**76**

COUNTER POSIITON 4

COMPARISON OF 2013 - 2014 EVENTS

Day & Date 2013	Day & Date 2014	Section 4 NW-Bound	Section 4 NW-Bound	Section 4 SE-Bound	Section 4 SE-Bound
	Mon 10th Mar		128		137
	Tues11th Mar		149		146
	Wed 12th Mar		133		148
	Thurs13th Mar		133		127
Fri. 27th Sept	Fri 14th Mar	151	155	159	144
Sat. 28th Sept	Sat 15th Mar	141	181	142	186
Sun.29th Sept EVENT DAY	Sun 16th Mar	**192**	**164**	**177**	197
Mon.30th Sept	Mon 17th Mar	152	153	161	157
Tues 1st Oct	Tues 18th Mar	173	162	162	178
Wed.2nd Oct	Wed 19th Mar	150	160	175	177
Thurs 3rd Oct	Thurs 20th Mar	133	132	156	154
Fri. 4th Oct	Fri 21st Mar	158	169	159	196
Sat 5th Oct EVENT DAY		**131**		**128**	
Sun 6th Oct		130		130	
Sat 5th Oct EVENT DAY	Sat 15th Mar	131	181	128	186
Non Event Day Sat. 28th Sept		141	-141	142	-142
Increase traffic		**-10**	**40**	**-14**	**44**
Sun.29th Sept EVENT DAY	Sun 16th Mar	192	164	177	197
Non Event Day Sun 6th Oct		130	-130	130	-130
Increased traffic		**62**	**34**	**47**	**67**