

**Additional 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 M Vandamme
and Mrs M Boycott**

**CRITIQUE OF
HIGHWAY NOTE
BY
ALAN DAVIES OF DTPC**

**CONSULTING ENGINEER
A. C. ROLLINGS B.Sc. (Hons) C.Eng.
M.I.C.E. M.C.I.H.T.
CIVIL ENGINEER, DEVELOPMENT
CONSULTANT, HIGHWAY ENGINEER.
17 BRAMBLETYNE AVE. SALTDEAN
E.SUSSEX BN2 8EL**

INDEX

Section 1 **INTRODUCTION**

Section 2 **CRITIQUE OF THE HIGHWAY NOTE BY ALAN DAVIES OF DTPC**

Section 3 **ADDITIONAL INFORMATION**

Section 4 **GENERAL SUMMARY AND CONCLUSION.**

APPENDIX A: **LAYOUT PLAN**

APPENDIX B: **TRAFFIC COUNT SUMMARY AND CALCULATIONS**

ISSUE	DATE	COMPILED	CHECKED
First Issue	19 June 2014	AR	SR
Second Issue	08 August 2014	AR	SR
Final Issue	12 August 2014	AR	JN

Section 1

INTRODUCTION

The application details have now been amended to remove “Events” from the everyday activities resulting in an application for up to 50 riders per day for training and schooling.

This change in application has been supported by a “Highway Note” from DTPC dated July 2014 and this rebuttal addresses this “Highway Note.”

In preparation of this rebuttal I have:

- visited and discussed the application with the objectors;
- read application documents, including the Transport Statement and Highway Note;
- visited and photographed the site on Tuesday 5th August 2014;
- consulted with Judith Norris, and met with the Planning Officers on that day;
- Driven around local roads;
- Commissioned 4 automatic traffic counts, which recorded the traffic from Thursday 31st July to Wednesday 6th August inclusive which recorded the traffic during a large equestrian Event at the site and 3 relatively normal workdays of Monday 4th to Wednesday 6th August.

Section 2 of this statement specifically deals with the matters raised in the Highway Note 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’ Highway Note.

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

Section 2

CRITIQUE OF THE HIGHWAY NOTE BY ALAN DAVIES OF DTPC

2013 Data

It has been established that no Planning Application exists for the commercial use of either the land enclosed in the red application area line or indeed other

adjacent land which appears to have been used for horse riding, therefore the Data for 2013 must include activities which form part of “Permitted Development” under the 28 day rule and the “Highway Note” does not admit this fact.

The data does not appear to include the larger Events which did take advantage of the 28 day rule and has been previously referred to by the objectors to both the application in 2013 and the Objection to the current Planning Application 14/00801. It is therefore contended that the Planning Authority have not been given accurate information on this matter and the figures quoted are misleading.

Capacity Review

The “Highway Note” states historical maximum of 33riders per day based on annual figures. It also states that only 15 riders can use the course at one time, it is not clear whether this is the existing course, or a combination of the new area coloured red and the existing course. In any case using the *“most people will school for 1hr – 1.5hrs per course”* the possibility is for 15riders x 8hrs a day which could equal a maximum of 120 riders using the course a day. It is not clear how the applicant is going to control the number of riders to the cap of 50 and how the Planning Authority could monitor this cap effectively

The figures quoted in the “Highway Note” are historical and based on activities carried out without Planning Permission and would probably be kept at low-key to avoid enforcement action being taken.

The historical data and any future predictions refer to horses and their riders with some reduction being claimed for some horseboxes bringing more than one horse.

However having discussed the operation of schooling, rallies, pony club camps, and training by professionals with people involved in the equestrian business, whilst they accept that some reduction in the number of horseboxes can occur where multiple horses are brought to the site, they have confirmed that additional traffic arrives at many of these activities such as;

- parents and spectators who would arrive separately in their own vehicles;

- professional trainers who often arrive with their assistants separately.

It is possible that the number of daily trips could rise to 250 trips a day, albeit a detailed analysis of the future business plan would need to be analysed to verify this.

Some acknowledgement of the above extra people involved is made in the “Highway Note” by stating on page 10 *“the use of cars or utility vehicles does occur on occasions and these are accommodated along the west side of the stables.”*

It is not clear what the real meaning of this application has for the site whilst it might be assumed by reading the document it is to regularise the existing business use of the farm however the stated view of the owners from previously publicised literature (supplied to me by the objectors) ie the “Swalcliffe Park Equestrian Ltd An Overview” published by themselves states under “Aims of the Business”

- *“to provide top class cross country schooling facilities all year round;*
- *attract a wide range of clients from professional riders to pony clubs and riding schools;*
- *be recognised as a training venue by British Governing Bodies (British Evening, British Riding Clubs, NSEA, Pony Clubs etc);*
- *Run competitions as a shop window for the training facilities;*
- *Provide a good standard of facilities for our livery clients.”*

The above is a clear indication that historical traffic data cannot be used to justify this Planning Application and that any business plan for the future should be used to predict accurate traffic generation figures. It is contended that some reference should be made to the cumulative impact of the recent development of the anaerobic digester on Grange Farm which is very unlikely to have sufficient crop to keep it going without imported material.

Updated Parking Proposals

The revised proposals show 22 parking spaces for horseboxes based on shared horses but it is not necessarily enough if the course was to be fully utilised and this amount of spaces would need to be proven as adequate.

In addition it is not accepted that the car-parking alongside the west side of the stables would accommodate the additional traffic that would be generated by the expansion of the training and schooling facilities.

Impact during Construction

The “Highway Note” states *“a routing strategy will be developed closer to the time of construction based upon the principle of using appropriate roads”*

It is contended that locally to the site there are **NO** appropriate roads and any use of these substandard roads will have a severe effect on the highway network

“Summary

The “Highway Note” states that *“The scheme accords with local and national policy to ensure safe access is provided and that any residual impacts are not deemed severe following use of the events management plan*

It is contended that both national and local policy is not adhered to by the proposal to increase the day to day traffic use or legal use of the site for equestrian use from a base level of zero to a possible projected level of say 250 trips a day on local substandard roads.

It is apparent that the application no longer seeks permission for Events and therefore reference to the Events Management Plan is misleading.

The “Highway Note” states that *“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. As such the scheme would have little or no impact on the local network for the day to day approved uses. 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.”*

The historical data has been calculated purely on the number of horses/entries and not on the actual traffic generation which is expected to vary considerably for the type of operation being conducted on the site at any one time. It is clearly the intension of the owners of the site to expand the training and schooling on the site for everyday use and therefore an accurate prediction of

traffic for this future use should be made available. Then and only then can a proper appraisal be made as to whether this increased traffic use would have a severe impact on the local substandard roads and the environment.

Section 3

ADDITIONAL INFORMATION

Whilst it is accepted that this application has been reduced to “schooling and training” on the site, it is contended that it will have a significant effect on the Permitted Development Rights which will enable larger “Events” to take place on 28 days of the year. The setting up and taking down of the course and facilities could be carried out during the weekdays and covered by the “Approved Uses” of the site. In keeping with the applicants stated objective to expand the facilities and events, the number of larger events held over weekends will have the opportunity to increase.

To illustrate the impact of traffic on locally unsuitable roads the traffic counts at the original designated positions (See **Appendix A**) were carried out over the weekend of the 1st – 3rd August 2014 when a large Event took place and a new comparison table is shown **Appendix B**.

It can be seen that on Friday 1st August, on the first day of the Event there was a 139% increase in traffic over the average daily flow approaching along Main Road from the east and 113% increase in traffic approaching along Main Road from the west. This traffic was approaching the newly formed entrance in Main Road close to its junction with Grange Lane (See Photos 1 & 2 below)

In addition there was an 81% increase in traffic in Grange Road at the upper portion of the Gated Road and a 33% increase in traffic on the Gated Road to the south. This additional traffic would be more biased toward the HGV range which creates noise and fumes to the annoyance of local residents and of course local villages.



Photo 1 Lorries approaching from the east and using the new entrance in Main Road (no traffic management being used).



Photo 2 View into 28 day Event through new entrance in Main Road showing a large amount of vehicles attending Event

Although the above refers directly to the 28 day Event the traffic figures can be used to assess the impact of the additional trips on an average weekday. The distribution of traffic to the Event indicates clearly that nearly all the traffic approaches the site either from the east or from the west along Main Road and therefore if the schooling and training attracts existing and new clientele in a similar traffic distribution way then the majority of the traffic will turn and approach down Grange Lane (upper section of Gated Road).

Using the average weekday traffic generation on Grange Lane (Section 3 of the table in **Appendix B**), the 2-way existing daily flow is $150 + 141 = 291$. Using say a lower generation of traffic of 100 trips a day (2 x 50 riders) then this would give a percentage increase of **34%**. However using a more realistic figure of 250 trips a day this would give an increase of **86%**. A large percentage of this traffic would be HGVs and it is considered that this is an unacceptable increase in the daily traffic on the very substandard roads that can only accommodate single file traffic.

Section 4

GENERAL SUMMARY AND CONCLUSION.

The Transport Statement and Highway Note does not reflect the true traffic generation likely to occur if Planning Permission is granted.

It has not been proven that the local substandard roads can accommodate any further traffic on them especially as a large number of them would be HGVs.

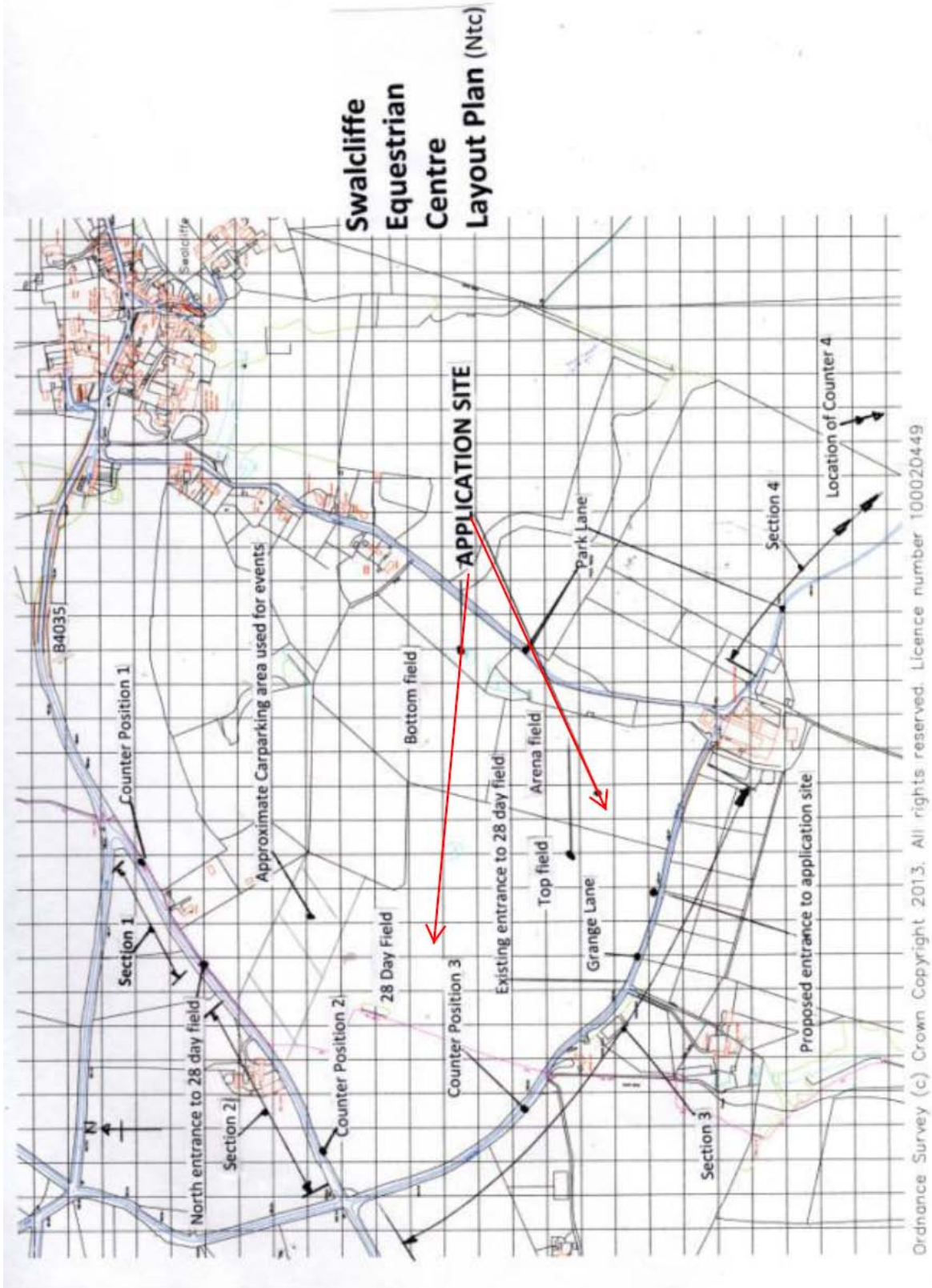
It is also noted that the number of large events will likely increase causing noise, fumes and disruption to local residents and indeed villages.

Even if the day to day traffic were to be capped it is not clear how the Planning Authority could effectively monitor this.

It is therefore contended that the Planning Authority should not grant this Planning Permission

...End of Critique...

APPENDIX A LAYOUT PLAN



APPENDIX B

TRAFFIC COUNT SUMMARY AND CALCULATIONS

Day & Date	Section 1	Section 2		Section 3		Section 4		
	SW-Bound	Section 1 NE-Bound	SW-Bound	Section 2 NE-Bound	NW-Bound	Section 3 SE-Bound	NW-Bound	Section 4 SE-Bound
Thurs 31st Jul 14	590	358	340	347	191	214	211	192
Fri 1st Aug 14	618	597	429	464	272	213	217	173
Sat 2nd Aug 14	550	537	431	376	240	196	202	146
Sun 3rd Aug 14	352	600	312	296	171	166	114	123
Mon 4th Aug	247	266	228	207	155	146	168	156
Tues 5th Aug	277	309	263	247	147	133	156	147
Weds 6th Aug	249	277	234	196	148	143	164	164
	<u>773</u>	<u>852</u>	<u>725</u>	<u>650</u>	<u>450</u>	<u>422</u>	<u>488</u>	<u>467</u>
Average weekday	258	284	242	217	150	141	163	156
Additional Traffic								
Thurs 31st Jul 14	332	74	98	130	41	73	48	36
Fri 1st Aug 14	360	313	187	247	122	72	54	17
Sat 2nd Aug 14	292	253	189	159	90	55	39	-10
Sun 3rd Aug 14	94	316	70	79	21	25	-49	-33
% Increase								
Fri 1st Aug 14	139	110	77	113	81	51	33	11

Traffic count summary between 31st July 2014 & 6th August inclusive

Also calculations of additional traffic on event days and % increase over normal working weekday