

**Statement of Objection to
Planning Application No. 13/01295 to
Cherwell District Council
For Part-Retrospective Change of Use of Land at
Grange Farm for Equestrian Training and
Competition Purposes and for the Construction of
Two All-Weather Sand Arenas Together with
Associated Access Improvements, Vehicle Parking
and Site Landscaping**

on behalf of
Mr and Mrs R Grimston, Mr and Mrs M Vandamme and
Mr and Mrs P Boycott
Neighbours of Grange Farm
Swalcliffe, Banbury, Oxfordshire OX15 5EY

**CRITIQUE OF
TRANSPORT STATEMENT
BY
ALAN DAVIES OF DTPC**

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Section 1

1. INTRODUCTION

Allen Rollings BSc (Hons) C.Eng MICE MCIHT has been appointed on behalf of the objectors of a Planning Application No. 13/01295 to Cherwell District Council for Part-Retrospective Change of Use of Land at Grange Farm for Equestrian Training and Competition Purposes and for the Construction of two All-Weather Sand Arenas Together with Associated Access Improvements, Vehicle Parking and Site Landscaping.

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;
- visited the site during a smaller event (approximately 90 entrants) on Saturday 5th October;
- commissioned 4 automatic traffic counts, which recorded the traffic from Friday 27th September to Sunday 6th October inclusive.

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.

Section 2

The Title and Their Introduction

“The proposals provide an improved area/warm up areas with associated parking adjacent to them to reflect the existing use on site but to provide a surface that can be used over the full season and be less weather dependant” (Underlining the writers)

The title of the application is misleading as it states that it is a part-retrospective application and the above statement in the introduction considers that the application reflects the existing use, however Section 3 of the application form states that none of the work has been carried out prior to the application being made and therefore it can only be assumed that this refers to the physical works with reference to the all-weather facilities. It is therefore not clear what the retrospective aspect of the proposal actually covers.

“The findings from the surveys indicate that the majority of users come and have training over the cross country course. These riders are largely eventers, therefore will be going to other venues to train in Show Jumping and Dressage. By introducing the new arena’s those riders would be able to train at Swalcliffe in all three disciplines for eventing thus reducing trips to other sites.”

This is basically true if referring to the site’s already existing customers but the new facilities will no doubt attract new customers to the site on the narrow and unsuitable roads leading to The Grange and thereby increasing the traffic generation to and from the site.

“The report shows that development in effect makes no material change to the way the site operates now but offers a less weather dependent service 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”.

Whilst the above can be generally true the statement provides no evidence of the existing traffic or predicted increase in it to allow a comparison to be made, but it is to be proved in this report that there is likely to be a significant traffic impact on unsuitable roads.

“2. NATIONAL AND LOCAL POLICY GUIDANCE”

Whilst reference is made to various policies, issue is taken with Policy 32 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 as 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**.

Also issue is taken with below:-

“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.”

But it is not agreed that the statement has proven that the traffic impact of the day to day activities of the development is insignificant and therefore has no such adverse impact.

The daily figure of 50 students equalling 100 trips attending with horseboxes 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 $100/291 \times 100\% = 34\%$ this assumes that the horseboxes approach from the northwest Main Street as this is the shortest route to the major highway network. There is an indication that a small number of vehicles approach from the south, Park Lane, during events and this could affect the above calculation slightly

“The 150 capped figure would equate to 20/hr split between the two routes, again below the threshold criteria and would have minimal impact on the local network.”

It is not clear why the above statement assumed that for the 40 events where it is capped at 150 entrants, this would equate to a 20 an hour split between two routes as this is obviously meant to refer to a large event such as took place on the 29th September where it is understood that the entry figure was between 50 and 150 and the overall increase in traffic on the local roads can be taken from the Table in **Appendix B** totalling $120 + 133 + 105 + 120 + 54 + 10 + 62 + 31 = 635$ and this is far in excess of $150 \times 2 = 300$ trips if one were to just count the entrants, this figure is higher because when the entries go up additional cars/ vendors arrive to assist the riders and/or to be a spectator, therefore the Transport Statement is very lacking and indeed misleading on these points.

In terms of the larger events which are limited in frequency by the GPDO it is obvious that it is intended to hold events which would attract traffic greater than the aforementioned 150 entries which would involve a larger area of the farms holding. It is however contended that events with up to 150 entrants, such as was held on the 29th September and 5th October, will need to use the overspill car-parking and alternative access points. It is therefore not understood why the area of the whole site is not being included within this application.

“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 which is not sustainable with regard to public transport and by its very admission relies on the car and horsebox transportation, either by 4 x 4 and trailer or large horseboxes often carrying more than one horse. 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, as 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. Then after 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 grassed area arena offer for shows and day to day training activities. It sits within a wider agricultural offer owned by the Park.”

From a site visit to the event on the 29th September and the 6th October it was noted that the events occupied only about 50% of the area coloured red and was stretched over the whole of the upper field (See Description in the

Planning Statement by Judith Norris). No use was seen to be made of the proposed lower field site which will become the centre for future events if the application is approved.

“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 characteristic 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.

There is no superimposing of the proposed 100 horsebox trips a day on the Volumetric Graphs in the Transport Statement which would then show a significant increase of traffic and with 85%ile speeds within the range of 32-35mph, where there is only one passing bay on the length of Grange Lane which is 0.95km, this would appear to create a serious safety hazard and for 40 times a year with an estimated increase of approximately 542 trips a day 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 and 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 indeed for even 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 (in the Transport statement) reinforce the total unsuitability of the road showing severe damage to the verge and dangerous muddy areas following wet weather. 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 also used by local equestrians accessing the local bridleway network.



View of the damage in Grange Lane



View of the damage in Grange Lane

With the use of an all-weather pitch at The Grange, 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 primarily the application is to allow all-weather use of the site and therefore this appears to be supporting the argument that damage will occur in winter.

“View to and from the junction with Park Lane”

The photos in the Transport Statement here illustrate well the narrowness of the approach lanes to The Grange which is to be the centre of the events and activities.

“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.”

Once again the description of the route is misleading as Park Lane connects in the north to the B3035 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 The Grange on its length. The verges are overrun in many places and once again its use in wet weather conditions will be treacherous (See Photos below).



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 has been admitted that the length of Park Lane from Swalcliffe is considered unsuitable for access to The Grange and during events it has a small sign erected at the junction of the B4035 directing traffic on towards Main Street, this route also has a 7.5T weight limit (see Photo below).



Weight Limit Signs at the Top of Park Lane

On the site visit on Saturday 5th October, the above route was driven along and due to the large number of residential cars parked; it was considered that a large horsebox would not be able to negotiate this route safely.

“View from south away from junction towards the Park”

This view (See Photo in the Transport Statement) illustrates well the sign clearly stating that there is a 7.5T limit and both photos show the narrowness of the lane with the muddied encroachments onto the verge.

“View left and right from Park Lane”

(See Photo in the Transport Statement) The condition of the road surfaces shown in these views clearly shows there is a considerable amount of mud that has been dragged onto the surface by vehicles having to mount the verge to pass each other and this makes the road very slippery and therefore extremely dangerous.

“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 matt strengthen track.”

The view photos (See Photos in the Transport Statement) show this access onto what has been classified as the 28 day field. This is a permanent feature for the equestrian activities on the farm and on the site visits on both the 29th September and the 5th October this was the ONLY entrance used for horseboxes and cars. Whilst the hedges in the photo are a winter scene, visibility photos shown below taken on the 5th October 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

It was reported to me that this was a small event although looking on the website there were 92 entrants registered on the day and therefore it is within the 50-150 entrants' band.

“Safety review along frontage”

It is noted that the Transport Statement addresses the historical accident records for the last 5 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 than 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 The Grange 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”

“.....As is common with seasonal based businesses, there are peaks in activity; the largest peak in 2012 was during March when the British Eventing Horse Trials took place over two days, with up to 500 riders taking part in the event over the two days. There is also a peak in training usage in August, which is linked directly to school holidays and pony club camps, something SPE is looking promote further in the future. SPE is also looking forward to hosting the British Riding Club National Championships in 2013, which will bring up to 600 riders to the venue to use all the facilities spread over 4 separate days.”

It is obvious that events of this size have been and will be carried out on land outside the application area albeit incorporating the application area for part of the events. It is assumed that these were and intend to be carried out as part of the 28 day allowance in the GDO. It is evident from the smaller events witnessed on both the 29th September and 6th October that the whole site ie including the land outside the area coloured red (the application site), is and will be used for all events. This use will increase with the installation of the all-weather facilities. Judith Norris will prove that this exceeds the 28 day rule and will contend that the application area should be increased to include the whole site.

“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.”

Although the information provided is interesting it doesn't predict the future use, if the proposal with all-weather and permanent facilities were to be allowed. The application seeks for everyday use by 50 entrants and 40 events of up to 150 entrants. The historical record shows by far the majority of the events have lower entry numbers although the numbers of many events are missing from the list. This information therefore is misleading and not applicable for the future use.

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

Although this information was used, in actual fact the information contained applies to “Home Zone” the definition of which is seen below from Wikipedia.

Home zone - Wikipedia, the free encyclopedia

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Home zone

From Wikipedia, the free encyclopedia
(Redirected from Home Zone)

A **home zone** is a living street (or group of streets) as implemented in the United Kingdom, which are designed primarily to meet the needs of pedestrians, cyclists, children and residents and where the speeds and dominance of the cars is reduced.

History

Background

Legislation was introduced by the Highway Act 1835 which banned the playing of football and games on the highway^[1] with a maximum penalty of up to forty shillings (£166.76 as of 2013^[2]).^[3] In 1860 Taverner John Miller, MP for Colchester reported to the House of



Entrance to a Home zone in Wonford

It is clear that the “Homezone” advice only 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.

TAL2/04 cover shown below is produced to advise on the implementation of a Traffic Calming Scheme where physical features are to be introduced such as “build outs,” appropriate signing and street furniture.

From the extract also shown below, it is clear that “passing bays are to be provided with spacings no greater than 60m and have a minimum length of 3 cars.” 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.



Rural traffic calming: Bird Lane, Essex



INTRODUCTION

Many rural communities are concerned about traffic growth and high vehicle speeds. Local authorities have to balance the need for traffic management against the desire to maintain rural character. Where roads have low traffic speeds and flows, they may be suitable for designation as Quiet Lanes to maintain these conditions. In Bird Lane designation as a Quiet Lane was considered. However, the high levels of traffic, the speed of vehicles, the perceived and actual risks to non-motorised users, and the lack of other roads to make into a Quiet Lanes network, meant designation was not considered a suitable option. A more interventionist approach was decided upon and a single-track with passing places scheme was implemented.

CONSIDERATIONS WHEN PLANNING A SINGLE TRACK WITH PASSING PLACES SCHEME

- To prevent excessive delay to vehicles, it is recommended that maximum two-way flow should not exceed 300 vehicles per hour. A certain equality of flow is important in order to achieve speed reductions and help prevent vehicles travelling in one direction forcing all others to give way.
- Passing places should have a minimum length of 3 cars. Ideally each passing place should be clearly visible from the last, with spacing no greater than 60m (research shows this is sufficient for vehicle flows of up to 300 vehicles per hour).

“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

This facility would allow SPE to provide good consistent ‘going’ all year round, which will enable SPE to maintain its position as a premier facility and retaining existing clients. The strategy for the business is to offer equestrian training facilities for the varying disciplines (dressage, show jumping, eventing) and be able to host training and smaller events throughout an extended part of the year and with fewer cancellations due to weather.”

The above statement reinforces the intention to hold all-weather events which will no doubt mean that the unsuitable narrow approach roads will be subject to all year round verge encroachment by vehicles wishing to pass each other resulting in severe wet weather damage to the verges and slippery road surfaces due to the wet soil being dragged onto the road.

*“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 150 in any one day. It is seeking to accommodate the existing use and the anticipated increase in use by providing a wider offer on an all weather basis. In this respect, the records kept by the business demonstrate that the 75 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 150 riders for the 40 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 where entries are assumed to be within the 50 – 150 band, the whole of the 28 day field was used for both eventing and parking, see photos below:-



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

Once again, proving the point that the planning applications “area coloured red” would appear to be incorrect for events attracting up to 150 entrants.

However to provide an element of control on the day to day operation a cap of 50 is set out for the day to day events, less than the recorded max set out. This level of usage, contained within the application site, will help to ensure that the impact of the development is limited and in fact though the changes now proposed, is reduced from the present.

It is proposed to provide a cap of 40 days on which events that exceed the 50 day to day and up to 150 in number can take place. This level has clearly been accommodated on site with the large scale of events undertaken.

It is accepted that events with 50 – 150 in number have taken place on the farm and these have been accommodated on the site but it is contended that all of these have occupied land outside the area coloured red contained within the application and have had to use unsuitable roads for access where there are no passing places and this is likely to have exacerbated the damage to the verges and carriageway surfaces. There is also a sharp increase in the traffic usage of the rural lanes during the events (See Summary in **Appendix B**).

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 above statement is challenged by Judith Norris as it appears that perhaps more than the 28 days will be used for events on land outside the area coloured red.

The surveys indicate that the majority of users come and have training over the cross country course. These riders are largely eventers, therefore will be going to other venues to train in Show Jumping and Dressage. By introducing the new arena's those riders would be able to train at Swalcliffe in all three disciplines for eventing

Whilst the above statement is in part true, the existing customers will make the same number of trips to the site using unsuitable roads and will no doubt stay longer on site, however the new facilities will also attract new customers thereby increasing the number of trips to site along these unsuitable roads.

“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 the south of the new arenas to provide increased semi-permanent parking which can be utilised during the larger events, thereby limiting the need for overspill grass parking.

The proposals appear to be offering 4000sq.m of car-parking at The Grange site to cater for events between 50 to 150 entrants, however 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 to be extended to cover the 28 day field for parking which will obviously be needed for the planned 40 events within this bracket of entry numbers.

Internal Access Road : in order to ensure the free movement of vehicles onto and off the site for riders attending events and training schools, it is proposed to construct a new single ‘track’ running from the junction of Park Lane and Grange Lane (the access to the existing car parking) through the new car park and continuing through the hedgerow, leading to a new access onto Grange Lane. This will ensure that vehicle movements are contained close to the existing Grange Farm complex and further away from other third party residential properties.

This proposal will have little effect on improving the environment of third party residential properties as by far the majority of traffic visiting the site in order to use these car-parks will be travelling down Grange Lane and there will therefore still be conflict with vehicles entering and leaving the site and on the normal users of the road. Vehicles will also be tempted to park on the verges of the lane as was photographed below on the 5th October visit even though the entrance into Grange Lane was not used on that day.



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 hold a smaller 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.”

This part of the statement is challenged separately by Judith Norris.

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

These references have been shown not to apply in the rebuttal to “Section 4 of the Transport Statement” above.

“There is anecdotal evidence that similar routes can achieve 500 two way flow per day without causing undue stress where there are passing bays. Furthermore, TAL guidance suggests that 300 vehicles per hour are acceptable. These flows are accommodated by two routes i.e. assuming 500 per day as a worst case divided by 2 give 250 per direction. These are below the capacity levels assuming they occur in one peak hour, they are spread across the morning period and are thus reduced.”

The traffic statement assuming that a 500 two way flow a day as a worst case scenario is probably a large underestimate as 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 between 50 and 150 using the suggested routing within 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

“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 4 traffic counts organised by the writer of this report, indicate that the generated traffic for events of between 50 and 150 are far greater than assumed in the Traffic Statement. It has therefore been shown that 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 100 trips made by the extra proposed horseboxes 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.

Section 3

This section just summarises the situation:-

It appears from a detailed analysis that the Transport Statement by Alan Davies of DTPC is very misleading.

- 1) It assumes that the traffic generation is based on purely the number of students or event entrants, while this may be correct for the day to day training activities where a student may well turn up in a horsebox or trailer it certainly does not appear to be the case when dealing with events with entrants of between 50 and 150, and certainly not when considering the larger National Events. Many additional vehicles for spectators, Marshalls, along with commercial vans bolster this number considerably. No mention can be found of the impact of these within the statement;
- 2) The aforementioned increase in traffic would appear to conflict with the NPPF and the Cherwell Local Plan;

- 3) The traffic counts taken during the event of 29th September and 5th October showed there was a significant increase in traffic on the local approach roads to the site;
- 4) Grange Lane and Park Lane are the only access roads to the site and these are narrow with considerable verge damage and are subject to a 7.5T weight limit thereby they are considered unsuitable by the Highway Authority for heavy vehicles. Many modern horseboxes are over 10T unladen weight;
- 5) The use of all weather facilities on the site will result in these unsuitable roads suffering further damage to the verges in wet and wintry weather, the mud etc will no doubt be dragged onto the road making it slippery and with the recorded speeds referred to in the Transport Statement of around 30mph it will make the roads very dangerous;
- 6) The calculation of the areas for the proposed car-park adjacent to the arenas appears to be woefully too small to cater for the observed horsebox use for the events. It would therefore appear that for the range of events with entrants between 50 and 150 a large area of the 28 day field will be required to be used as overspill parking with entry from Main Road. The background traffic in Main Road is already quite high and the obstructions caused by entry and exiting the site would be hazardous as evidenced by the site visit on the 5th October;
- 7) The Transport statement appears to rely on standards quoted for “Homezones” and Traffic Calming Schemes with passing bays, neither of which is applicable to this site;
- 8) The calculations of traffic generation shows that the proposal for events of between 50 and 150 entrants using the suggested routing to the area coloured red is totally unacceptable on the current unsuitable roads.

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 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.

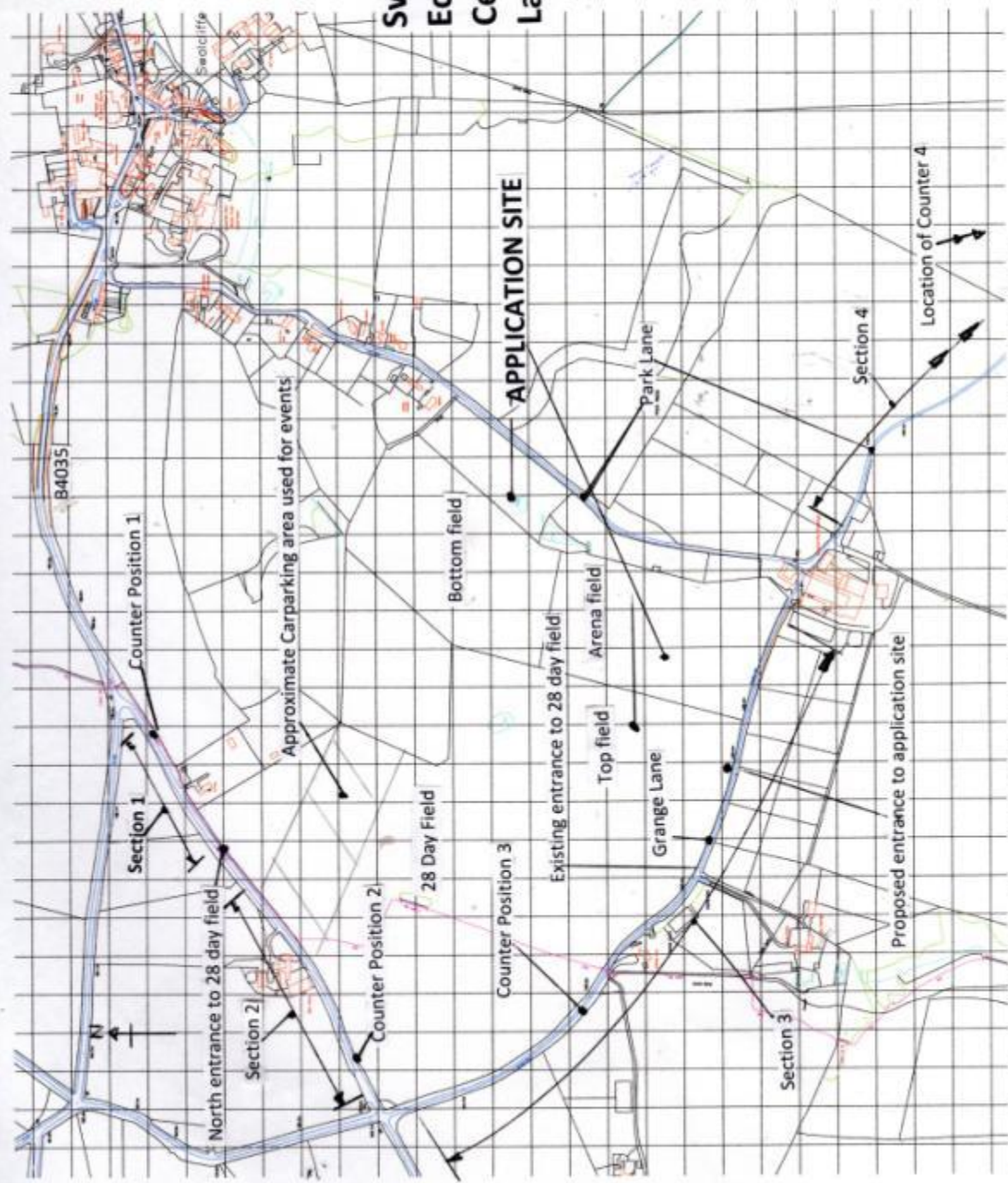
There appears to be some considerable confusion over the application area as it appears that for the 40 events where up to 150 entrants are to be expected the whole of the equestrian site outside the area coloured red would be used and therefore requiring a larger scale assessment of the entrances, parking areas and access roads.

The Highway Authority would need to consider in detail the missing elements in the Transport Statement and I would therefore recommend that a Holding Objection be made until mitigation for the increased traffic is proposed.

...End of Critique...

APPENDIX A LAYOUT PLAN

Swalcliffe Equestrian Centre Layout Plan (Ntc)



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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
<u>Sun.29th Sept EVENT DAY</u>	<u>376</u>	<u>362</u>	<u>355</u>	<u>342</u>	<u>184</u>	<u>154</u>	<u>192</u>	<u>177</u>
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
<u>Sat 5th Oct EVENT DAY</u>	<u>343</u>	<u>348</u>	<u>379</u>	<u>372</u>	<u>147</u>	<u>137</u>	<u>131</u>	<u>128</u>
Sun 6th Oct	256	229	250	222	130	138	130	130
<u>Sat 5th Oct EVENT DAY</u>	<u>343</u>	<u>348</u>	<u>379</u>	<u>372</u>	<u>147</u>	<u>137</u>	<u>131</u>	<u>128</u>
Non Event Day Sat. 28th Sept	318	313	313	304	130	131	141	142
<u>Increase traffic</u>	<u>25</u>	<u>35</u>	<u>66</u>	<u>68</u>	<u>17</u>	<u>6</u>	<u>-10</u>	<u>-14</u>
<u>Sun.29th Sept EVENT DAY</u>	<u>376</u>	<u>362</u>	<u>355</u>	<u>342</u>	<u>184</u>	<u>154</u>	<u>192</u>	<u>177</u>
Non Event Day Sun 6th Oct	256	229	250	222	130	138	130	130
<u>Increased traffic</u>	<u>120</u>	<u>133</u>	<u>105</u>	<u>120</u>	<u>54</u>	<u>16</u>	<u>62</u>	<u>47</u>

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	<u>392</u>	<u>416</u>	<u>402</u>	<u>398</u>	<u>145</u>	<u>148</u>	<u>153</u>	<u>162</u>