

**Additional Statement of Objection to Planning
Application No. 14/01/762 to**

Cherwell District Council

**by Swalcliffe Park Equestrian, for a
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
Swalcliffe Banbury**

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 ASSESSMENT
BY
ALAN DAVIES OF DTPC**

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General Summary

It appears from a detailed analysis that the Transport Assessment carried out by Alan Davies of DTPC is very misleading and in some respects not comprehensive enough, the following are matters of serious concern:-

- The traffic figures for a main event on 21st September 2014 and the conclusions drawn from this relate only to weekend traffic. The intensions of the applicant are clearly stated that events will increase to 28 days a year, already this year on the 1st, 2nd and 3rd of August a National Event took place and on one of the days Friday 1st August the traffic impact was on a weekday and there is no assessment of this traffic and the impact it had on existing roads and junctions. The Assessment is therefore unrepresentative of what is likely to occur in the future if planning permission is granted;
- When considering the day to day training the assessment assumes that the traffic generation is based on purely the number of students or event entrants, as 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 up to 50 as 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 assessment. It should also be considered that the entrant may also have more than one horse which does confuse the numbers;
- The traffic counts commissioned by the Objectors during the event of 29th September, 5th October 2013 and 1st to the 3rd August 2014 showed there was a significant increase in traffic on the local approach roads to the site which in places disagrees with the assessments' traffic count carried out on the 21st September 2014;
- 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;

- 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 up to 50, vehicles will also be required to use the overspill parking with entry from Main Street. The background traffic in Main Street 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 2013 and illustrated in photographs forwarded previously and enclosed within this critique;
- The Transport Assessment appears to rely on standards quoted for “Homezones” and Traffic Calming Schemes with passing bays, neither of which are applicable to this site;
- The calculations of traffic generation shows that the proposal for events of up to 50 and up to 250 entrants using the suggested routing to the area coloured red is totally unacceptable on the current unsuitable roads.
- The sign diversion for the recorded events on the 21st September still resulted in considerable traffic using Park Lane South (Gated Road South) and Grange Lane. If this traffic was to be prevented then it would be diverted to the narrow roads of Sibford Ferris.
- The aforementioned increase in traffic would appear to conflict with the NPPF and the Cherwell Local Plan.

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. 14/01/762 to Cherwell District Council for a change of use of land at Grange Farm for mixed use comprising equestrian training/ competitions (Use Class D2) and agriculture together with the extension of existing vehicle parking area

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 objection I have:

- Relied on my previous visits;
- Discussed the application with the objectors;
- Read application documents, including the Transport Assessment;
- Relied on my visit and photographs taken on Tuesday 5th August 2014;
- Consulted with Judith Norris;
- Attempted to discuss the assessment with the Oxfordshire County Council's Highways Department

It is assumed that the application now seeks to achieve what I believe was the applicants original long-term intention ie:-

1. To have training for 7 days a week for up to 50 horses a day;
2. To have competitions with up to 50 entrants on 7 days a week;
3. To have larger events of up to 250 entrants a day on 28 days a year.

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

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

Section 2

CRITIQUE OF THE TRANSPORT ASSESSMENT BY ALAN DAVIES OF DTPC

National & Local Policy Guidance

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and ***support its health, social and cultural well-being***; and

Core Planning Policies

- take account of and support local strategies to improve health, social and cultural wellbeing for all, and ***deliver sufficient community and cultural facilities and services to meet local needs***.

The above policies which are emphasised by the writer are trying to suggest that the large equestrian facility serves a local need, there is however no information about where the clientele of the training facility and entrants to the minor and/or major events come from. It would appear that currently titles of some events containing the word “National” would strongly indicate that many of the competitors come from long distances.

In addition referring to the long term aims published documents of the applicant (if realised) the facilities at the site will grow bigger and eventually attract both National and International riders.

Promoting Sustainable Transport

32 All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- ***the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure***;
- ***safe and suitable access to the site can be achieved for all people***; and
- 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 without footways and very little public transport 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 contended that the majority of the roads are unclassified or C Roads surrounding the site and parts of the B-roads are narrow and unsafe and therefore this policy is not met with this application.

Policy TR7 is also 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 contended that the Transport Assessment has proven that the traffic impact of the day to day activities of the development is significant and becomes even worse when considering the large events carried out on 28 days of the year.

“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.”

This application is for a site in the countryside which is not sustainable with regard to public transport and pedestrians. By its very admission the application relies on the car and horsebox transportation, either by 4 x 4's 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. It is therefore certainly not a **local** facility

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 the north such as Brailes. 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 Assessment 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 2013 it was noted that the events occupied all the site of the area coloured red and was stretched over the whole of the upper field (See Description in the

Planning Statement by Judith Norris). The plan is therefore unclear as to what the hatched area red really applies to as there is no parking for additional supporters for the training and it cannot possibly apply to the events for up to 50 entrants as spectators and horseboxes will not fit in to the small carpark proposed at Grange Farm so it does appear to be misleading.

“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. Two inspections have been carried and the following show the roads in the spring and late summer period.

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. Dimensions of the local roads should have been included in the Transport Assessment.

There is only one passing bay on the length of Grange Lane which is 0.95km, this would appear to create a **very severe** safety hazard as the road is very narrow and unsuitable for the increased use by horseboxes and additional traffic travelling to and from minor and major events.

The photos of all the routes on pages 6 -10 (of the Assessment) show that the local roads have been severely damaged by the unapproved use of the equestrian centre to date and it is very surprising that the Highway Authority have not taken action to prevent this ongoing damage as they do have powers under the Highways Act.

“Main Street 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.”

Main Street is insufficiently wide for 2 large horseboxes to pass, without being very careful albeit no measurements are shown in the Transport Assessment.

Main Street is the main access road into Sibford Ferris from the East.

It is used by school buses, public buses, refuse wagons, delivery vehicles to shop, oil tankers etc

The view photos (See Photos in the Transport Assessment) show this access onto what has been classified as the 28 day field(top 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 2013 this was the ONLY entrance used for horseboxes and cars. Whilst the hedges in the photo are a winter scene, visibility photos shown below are an autumn scene taken on the 5th October 2013 and show there is restricted visibility for those exiting the site.



Visibility to the right from the Northern Field Access on to Main Street



Visibility to the left from the northern Field Access on to Main Street

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

50-250 entrants' band but this is therefore close to the 50 rider a day limit that is being sought by the planning application for permission for 365 days a year.

It is also very confusing as to what entrance is being proposed to be used as the photographs in the Transport Assessment and indeed mine too, refers to an entrance near Partway House whereas the Events carried out this year appear to have used an entrance further west closer to Elm Farm which has recently been constructed without planning approval and was pointed out to the Planning Officer at a meeting on site about the previous planning application.



New Gate position



Resulting layout when using new gate position.

The above photos taken in August 2014 during the 3-day National Event appear to be at odds with those taken on site on the 21st September under the Section 6 of the Transport Assessment “The Event Internal Arrangements,” so once again misleading or confusing information is being presented.

“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. Surveys”

It is very much appreciated that the traffic flows on Sunday 21st September appear to have been well documented and it appears that a full diversion signing scheme was in place, so we can judge the possible effectiveness of a Traffic Management Scheme which is proposed to be carried out on 28 days of the year.

The current application puts forward a routing proposal to avoid the use of the gated road south, Park Lane and Grange Lane and does so by suggesting that all traffic be diverted onto the B4035 and then onto Main Street to use the recently constructed access onto fields close to Elm Farm.

As I see it, my concerns and indeed the concerns of the Highway Authority should now be:

1. Firstly, whether the additional traffic should be allowed through the Villages of Tadmarton, Swalcliffe after a considerably long diversion. More importantly whether a large amount of additional traffic should be allowed to divert through the narrow and often single lane track of Sibford Ferris.

It would appear from the survey summary information on page 31 that on the Event days **656** vehicles passed through Sibford Ferris of which 37 were horseboxes.

It is estimated that from the figures entering or passing the site entrance that approximately half of the traffic was travelling to and from the event on 21st September.

This is a considerable increase in traffic through the narrow unsuitable roads in the village centre.

The traffic is likely to increase if strict measures are in place on the gated road south (Park Lane), where vehicles appear to approach the site despite the weight limit and signing onto the diversion route, as it is recorded on the event day that approximately 368 movements took place of which 57 were horsebox movements.

2. Secondly, whether the temporary diversions and even an improved signage scheme could enforce the long diversion for traffic approaching from the southwest along Oatley Hill Road.

From the figures in the previous paragraph the diversion appears not to have worked resulting in a large amount of traffic using the gated road south(Park Lane).

The probability is that if gated road south was closed to traffic on the events days by effective signage at the minimum then all the traffic may well enter and exit through the narrow roads in Sibford Ferris despite being signed to use the long diversion along Ushercombe Road onto the B4035 and through Tadmarton.

3. Thirdly, the traffic on Main Street on an event Sunday dramatically increases, the traffic count included in the Transport Assessment by Alan Davies under "Vehicle Movements on Sunday 21st September 2014 6am to 8pm", shows that the traffic east of the entrance to the site carried 757 vehicles and on the west of the site 733 vehicles. For a normal Sunday on the 28th September taken from their traffic count on pages 27 and 28 of the same Traffic Assessment it would appear to show a two way flow in the region of 323 vehicles which in the worst case scenario shows an increase of 434 vehicles on an event day, an increase of 134% which in my opinion is considered to be very significant and likely now to occur on 28 days a year including some weekdays.

Surely this cannot be acceptable in a rural location with unsuitable roads

4. Fourthly, No information is given on the likely number of, and traffic generation from, the events that have up to 50 entrants, these events are proposed to be allowed 7 days a week throughout the year. There is no proposal to accommodate the parking for spectators and other facilitators and therefore it must be assumed that parking on the upper field similar to that used at the larger events will take place albeit to a lesser degree. I witnessed an event with 90 entrants last year and reported on the traffic and parking (see previous critique) and this is precisely what happened.

The above figure does not take into account the approximate 240 trips counted on the gated road south using Grange Lane which may or may not find alternative routes to the site. The inclusion of these figures will no doubt make the traffic increase even higher.

From surveys carried out on Grange Lane both north and south of the stables ie in the gated road south, there appears to be an increase in traffic looking only at the 12hr flow on the 21st September (event day) especially highlighted in the table on page 23 where the traffic was 143 eastbound and 131 westbound, the following weekend on a normal Sunday it was 80 vehicles eastbound and 70 westbound. These figures show a much higher use of the unsuitable and narrow roads during event days despite the diversion signs being in use.

Turning to the gated road south or the link road from the Grange Road to the junction 2 on page 26, there is a strange anomaly where the vehicles on the Event day westbound are apparently only 34 and eastbound 34 whereas the following Sunday on a normal Sunday they are recorded to be 93 & 97, there appears to be a great conflict between these figures and the summary figures shown on page 31 where it shows 174 vehicles westbound and 192 eastbound on an event day, so clearly some explanation is required!

“Vehicle Splits for Events and Occupation”

The table on page 30 states that the number of vehicles attending the site was 274 however the summary shown on page 31 indicates that there were $158 + 210 = 368$ vehicles entering the site with $58 + 125 = 183$ horseboxes there is obviously some difference between this table and the summary sheet which requires a lot of explanation as it is very hard to understand and appears to be giving a misleading view.

“Road Capacities”

Mr Davies gives a Table from TA 4697 which has no relevance on the size of the local highway network affected by this proposal. The Design Manual for Roads and Bridges does give a procedure for working out the capacity of existing roads from 6m and above however the Transport Assessment has not quoted road widths or visibilities as is normal in a Transport Assessment so there is no way that the Assessment can state “the links have no capacity issues which is the real test of traffic volume not just the change”.

The summary of vehicle movements in diagram page 31 gives a clear picture of the distribution of traffic on an Event Day and my comments made above largely refer to this diagram.

The overall comments made on pages 31 & 32 are general but there is every reason to believe the dramatic increase in traffic movements at the junctions would necessitate an investigation by PICADY to ascertain the impact of this increased traffic largely on substandard roads. This is very important when a large event takes place on a weekday with possible conflicts with peak hour flows.

“5 Event Signage”

The Assessment illustrates the diversion signage attempted on the Event day, signage of this nature is of an unapproved standard and should be considered by the Highway Authority as an obstruction and is normally removed by them. It is however accepted that an approved signage scheme could be implemented but this would have to go through a stringent approval procedure with the Highway Authority and it is not known whether this would be acceptable by them. As mentioned throughout this critique the current scheme appears to have had no effect on the traffic travelling to and from the

event using Sibford Ferris, Park Lane (gated road south), or indeed Grange Lane.

“6 Event Internal Arrangements”

This section does not really have any effect on highway matters other than the obstruction to Main Street for vehicles entering and leaving the site. However it does illustrate precisely the environmental impact on the adjoining neighbours.

“7. Event And Training Operation”

This element of the planning application has been rebutted on the previous application but it is sufficed to comment on the below:

Day to Day training 2012

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.

It shows most activities are less than the proposed 50 user cap except for 8 events which would be covered by the 28 days per year allowance.

Firstly it must be stated that there are **no approved uses** of the existing site other than agriculture.

Although the information provided is interesting it doesn't predict the future use. The application seeks for everyday use by 50 entrants and 28 events of up to 250 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.

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.

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 Assessment refers to the 2007 GTA and to 30 two way trips as being the level of impact, below which a formal assessment may not be needed. It is however interesting to note that for the Event days including those allowing 50 entrants no formal assessments on the junctions have been carried out thus calling into question the validity of the Transport Assessment presented with this application.

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

In addition to the normal events and training the school also host a number of larger events across the year.

Whilst it is accepted on the wider local network it would have a limited affect it would have a drastic affect on the single track roads with minimal passing bays immediately serving the site. This would be further proven by the “normal larger events” that the school hosts across the year.

All events use the two routes described and capacity of such routes is given below but focussed on the approved day to day normal activities.

I am not sure that the two routes *are* described but it is obvious it is referring to Grange Lane and Park Lane south (the gated road). My previous critiques clearly discredit the use of these roads as no passing bays have been proposed.

“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

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.

“Day to Day Events 2013”

As mentioned before all historical training and events listed here were carried out without planning permission and therefore there is every likelihood that they will increase in the future once planning permission is granted.

Events

The surveys undertaken for the 230 attendees is consider representative of the maximum events applied for and previously promoted under the 28 day rule and have thus been accommodated on the network previously with no recorded safety issues.

Whilst it is accepted that surveys taken on Sunday 21st September represents a “large event” that was previously promoted under the 28 day rule and now sought to increase by way of a planning approval, the surveys do not take into account the events that have in the past and are likely to take place more frequently in the future on a weekday.

This was apparent when a 3-day event occurred on the 1st, 2nd and 3rd of August 2014 where a British Riding Club Event was held and there were approximately 650 entrants. The traffic figures for this day have already been submitted previously.

8. THE PROPOSALS AND LAYOUT

Development Proposals

In terms of the day to day training, the vast majority of users of facilities at SPE are training over the cross country course. These riders are largely eventers, therefore will need to be travelling to other venues to train in show jumping and dressage.

The use of the cross-country course would appear to take it outside the hatched area where it is stated the day to day activities would be confined. It is interesting to note that the show jumping and dressage areas are included in this application and the idea that they would be travelling to other venues for this appears to be false resulting in more vehicles being attracted to the site.

This will help to secure the business' long term future and ensure that the facility remains available as a vital resource to the equestrian community in this part of north Oxfordshire and beyond

This statement clearly shows that it is not a *local* facility

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 not understood how this planning application would reduce the impact of the development from the present in fact it is evident it will considerably *increase* its impact.

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 50 in any single day, the applicants previously relied on 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, this is now applied for hence the survey detail provided.

Historically the events allowed under the Permitted Development Order would include the setting up and taking down of the jumps and facilities of such an event thus reducing the ability to legally have no more than 5 or 6 events a year.

If approval is given for smaller events on any day of the year this permission will be used to set up for the major event thus enabling 28 large events a year, whether under this permission or indeed using Permitted Development Rights.

Layout

The layout is illustrated on below (see architect drawing for full details) and included in the figures section.

Details of the gate are shown but the location of the proposed entrance is not shown. There are 2 new entrances onto Main Street as mentioned previously both of which have planning issues. The location of all entrances should be clearly shown on the drawing.

The access will be used for events only and remove the need to use the other two existing access points, it will be 14m wide and gated, these access points have been used historically for events of a similar size. The sight lines are similar in nature to the existing access points which have not given rise to a recorded safety issue.

As mentioned previously all accesses should be shown. Most importantly the visibility splays to and from the access shown on Drawing No. J251 Access Fig 1 shows visibility splays of 2.4m x 107m to the right and 2.4m x 53m to the left but to the opposite side of the road, **(this is a serious safety issue)** it is accepted by the assessment that the speed limit on Main Street is 60mph and without a speed survey and accompanying calculations it is normal for the Highway Authority to request a visibility splay of 2.4m x 250m to the nearside edge, this is obviously not available at the proposed access which will be used 28 times a year for major events and on any day for minor events as the enlarged carpark at Grange Farm cannot accommodate all those wishing to attend a smaller event.

9. MITIGATION AND SUMMARY

The events management plan with improved signage is still to be assessed as to its effectiveness. The junction shown on Drawing No. J251 Swalcliffe Access Fig 1 appears to be unsafe and requires justification as regards proposed visibility splays.

Although the traffic flows have been for up-to-date levels they have not been overlaid onto the weekday traffic including peak periods as historically large events have been held during this time and will no doubt increase in the future.

It is therefore contended that the statements that “there are no capacity issues” or “no impact on the local network” cannot be made without further information and surveys being carried out.

SECTION 3 ADDITIONAL POINTS, SUMMARY AND CONCLUSION.

It appears from a detailed analysis, that the Transport Assessment carried out by Alan Davies of DTTC is very misleading and in some respects not comprehensive enough.

- The traffic figures for a main event on 21st September 2014 and the conclusions drawn from this, relate only to *weekend* traffic. The intentions of the applicant are clearly stated that events will increase to 28 days a year, already this year on the 1st, 2nd and 3rd of August a National Event took place and on one of the days Friday 1st August the traffic impact was on a weekday and there is no assessment of this traffic and the impact it had on existing roads and junctions. The Assessment is therefore unrepresentative of what is likely to occur in the future if planning permission is granted;
- The increased traffic at all local junctions and beyond that are subjected to increased traffic volumes should be assessed properly and the safety of them confirmed, this is especially so at the junction of Tyne Hill and the B4035 which in my opinion is unsuitable for heavy traffic flows.
- When considering the day to day training the Assessment assumes that the traffic generation is based on purely the number of students or event entrants, as 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 up to 50 as 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 Assessment. It should also be considered that the entrant may also have more than one horse which does confuse the numbers;
- The traffic counts taken during the event of 29th September, 5th October 2013 and 1st to the 3rd August 2014 showed there was a significant increase in traffic on the local approach roads to the site which in places disagrees with the assessments' traffic count carried out on the 21st September 2014;

- 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;
- 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 up to 50, vehicles will also be required to use the overspill parking with entry from Main Street. The background traffic in Main Street 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 2013 and illustrated in photographs forwarded previously and enclosed within this critique;
- The Transport Assessment appears to rely on standards quoted for “Homezones” and Traffic Calming Schemes with passing bays, neither of which are applicable to this site;
- The calculations of traffic generation shows that the proposal for events of up to 50 and up to 250 entrants using the suggested routing to the area coloured red is totally unacceptable on the current unsuitable roads.
- The sign diversion for the recorded events on the 21st September still resulted in considerable traffic using Park Lane South (Gated Road South) and Grange Lane. If this traffic was to be prevented then it would be diverted to the narrow roads of Sibford Ferris.
- The aforementioned increase in traffic would appear to conflict with the NPPF and the Cherwell Local Plan.

MATTERS RAISED WITH THE HIGHWAY AUTHORITY

A very disconcerting fact is that I do not believe that the Highway Authority has given due consideration to the highway impact of this planning application.

In order to ascertain the Highways position especially as they previously objected to Application No. 14/00801 containing provision for competitions up to 50 entrants, I tried several times to contact Mr Geoffrey Arnold in week commencing 24th November requesting a return call. I finally got through to his office on Friday 28th November and was told that he had not as yet looked at the application but would do so in week commencing 1st December and he would then ring me.

I had been through this similar process with him before in 2013 and I therefore decided to email him on Monday 1st December (See Appendix A) and remind him that he had only withdrew his objection to the training proposal contained in Application 14/00801 following the removal of the competition elements (See Appendix B).

I was totally taken aback when on Tuesday 2nd December Mr Arnolds formal response to the application appeared on the Web with the date of 28th November, the same day I was informed that he had not yet looked at the application.

I therefore believe that half a day would not have been sufficient time to fully appreciate the implications of the application

In addition I notice from the Web that the Swalcliffe Parish Council, who made their response *after* Geoffrey Arnold had made his response, made a request that the Highways Department look at the increased traffic through Swalcliffe and Tadmarton and I also notice that Sibford Parish Council made request of the Highways Department to consider the improvements to Grange Lane but obviously both of these requests would have fallen on deaf ears as the response had already been made.

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 access and actual proposed use of the site.

The Highway Authority should consider in detail the missing elements in the Transport Assessment and I would have expected that a Holding Objection should have been made by the Highway Authority until mitigation for the increased traffic is proposed.

...End of Critique...

**APPENDIX A EMAIL SENT TO OXFORDSHIRE COUNTY COUNCILS HIGHWAYS DEPARTMENT
ON MONDAY 1ST DECEMBER 2014**

Dear Mr Arnold,

Your response to Planning Application No 14/01762.

I am sorry you were unable to talk to me last week when I telephoned your office, I understand that you have not as yet looked in detail at the highway implications of the above planning application.

In summary the application now seeks to achieve what I believe was their original long-term intention ie:-

4. To have training for 7 days a week for up to 50 horses a day;
5. To have competitions with up to 50 entrants on 7 days a week;
6. To have larger events of up to 250 entrants a day on 28 days a year.

The applicant is obviously aware of your previous response to application No 14/00801 (copy attached where you supported the use of substandard roads for the day to day training but objected to any events being carried out.

This current application puts forward a routeing proposal to avoid the use of the gated road south, Park Lane and Grange Lane and does so by suggesting that all traffic be diverted onto the B4035 and then onto Main Street to use the recently constructed access onto fields close to Elm Farm. The applicants Highway Consultant has rightly criticised the illegal and substandard signage use on the 21st September to achieve this.

As I see it, my concerns and indeed hopefully your concerns should now be:

1. Firstly, whether the additional traffic should be allowed through the Villages of Tadmarton, Swalcliffe and more importantly Sibford Ferris.
2. Secondly, whether the temporary diversions and even an improved signage scheme could enforce the long diversion for traffic approaching from the southwest along Oatley Hill Road. A summary of the traffic surveys carried out on the 21st September shows that at least 145 vehicles including 26 horseboxes chose to use the gated road south on that day (an event day), it also shows that from Sibford Ferris via Main Street there were 204 vehicles plus 19 horseboxes. The probability is that if gated road south was closed to traffic on the events days by effective signage at the minimum, then all the traffic may well enter and exit through the narrow roads in Sibford Ferris despite being signed to use the long diversion along Ushercombe Road onto the B4035 and through Tadmarton.
3. Thirdly, the traffic on Main Road on an event Sunday dramatically increases, the traffic count included in the Transport Assessment by Alan Davies under “Vehicle Movements on Sunday 21st September 2014 6am to 8pm”, shows that the traffic east of the entrance to the site carried 757 vehicles and on the west of the site 733 vehicles. For a normal Sunday on the 28th September taken from their traffic count on pages 27 and 28 of the same Traffic Assessment it would appear to show a two way flow in the

region of 323 vehicles which in the worst case scenario shows an increase of 434 vehicles on an event day, an increase of 134% which in my opinion is considered to be *very* significant and likely now to occur on 28 days a year.

4. Fourthly, No information is given on the likely number of, and traffic generation from, the events that have up to 50 entrants, these events are proposed to be allowed 7 days a week throughout the year. There is no proposal to accommodate the parking for spectators and other facilitators and therefore it must be assumed that parking on the upper field similar to that used at the larger events will take place albeit to a lesser degree. I witnessed an event with 90 entrants last year and reported on the traffic and parking (see attached critique) and this is precisely what happened.

The above figure does not take into account the approximate 240 trips counted on the gated road south using Grange Lane which may or may not find alternative routes to the site. The inclusion of these figures will no doubt make the traffic increase even higher.

Please find attached copies of my previous critiques and I have been asked to carry out a more detailed critique of the current highway report in objection.

My main reason for contacting you last week was to ascertain your current feeling on the revised routing and impact on the local highway network of the new application.

The policy TR7 of the Local Plan states that “development that would regularly attract large commercial vehicles or large numbers of users onto unsuitable minor roads will not normally be permitted”. The Transport Assessment clearly shows that this policy is breached. With this policy in mind and the large increase in traffic proposed on unsuitable and minor roads a conclusion must be reached in line with Para 32 of the NPPF that the “residual cumulative impacts of development **are severe**”

I would therefore still appreciate discussing the complex highway report provided by the applicant with you once you have had time to assess it along with the above.

Kind regards,

Allen

Allen Rollings
BSc (Hons) C.Eng MICE MCIHT

Consultant

From: Arnold, Geoffrey - Environment & Economy [<mailto:Geoffrey.Arnold@Oxfordshire.gov.uk>]
Sent: 19 August 2014 16:13
To: Bob Neville
Subject: RE: Swalcliffe Park Equestrian - 14/00801/F

Dear Bob

RE: Swalcliffe Park Equestrian - 14/00801/F

Thank you for the additional information that has been submitted. This has helped to provide a better understanding of the proposal and its impact upon the local highway network. Following consideration of the addendum and the applicants undertaking, *'restriction to the planning consent that the 50 riders per day maximum relates only to schooling and training/clinics, with no competitive events permissible under this permission'*, I confirm I do not wish to object to the application for planning permission subject to the following conditions being imposed:

D29 – Parking & Manoeuvring Areas as Plan

E2 – Surface Water Drainage

Please contact me if you would like any further comments or clarification regarding this application.

Kind regards

Geoffrey Arnold

Senior Engineer – Transport Development Control

Oxfordshire County Council

Speedwell House Oxford OX1 1NE

DD: 01865 328 797