

Sandown Park Racecourse

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Transport Proof of Evidence by
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JCR5/1 Transport Proof

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transport planning practice



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1 INTRODUCTION

1.1 Experience and Qualification

1.1.1 My name is Michael Lewin, I am a member of the Institution of Civil Engineers, a member of the Chartered Institute of Highways and Transport and a Chartered Engineer.

1.1.2 I am a Director of Transport Planning Practice and have over 30 years' experience in the UK and overseas. Prior to setting up Transport Planning Practice I worked for Ove Arup & Partners and Capita Symonds. I specialise in transport, highways and traffic issues, providing advice on schemes at all stages from identification of concepts to feasibility studies, planning applications and implementation.

1.2 Appointment

1.2.1 Transport Planning Practice (TPP) has been working with Jockey Club Racecourses Limited (JCR), on the proposed development at Sandown Park, since 2016. Therefore we are very familiar with the area and the Racecourse.

1.3 Structure of Evidence and Conclusions

1.3.1 My evidence concentrates on the proposed residential and hotel development, these being the items to which Esher Borough Council (EBC) members objected. Questions raised by third parties in relation to the Racecourse improvements are addressed in section 7.0. The evidence is structured as follows:

2.0 Existing Situation and Proposed Development; This demonstrates the development is in a highly sustainable location.

3.0 Trip Generation and Transport Impacts; Concludes that there will be no adverse transport impacts.

4.0 Sustainable Transport Improvements; Describes the sustainable transport improvements that would arise from the development.

5.0 Safety Benefits; Outlines the proposed safety improvements.

6.0 Transport Reasons for Refusal; Addresses the reasons for refusal concluding that the development would have no adverse transport impacts.

7.0 Third party Concerns; Considers concerns raised by members of the public.

8.0 Conclusion; The proposed development is in a highly sustainable location, would have positive transport impacts particularly in terms of safety and sustainable transport , would cause no harm in terms of its impact, is fully in accordance with transportation and highways policy and there are no valid reasons for refusal on transportation or highways grounds

1.4 Glossary

- JCR – Jockey Club Racecourses.
- EBC_ Esher Borough Council.
- SCC – Surrey County Council
- TPP – Transport Planning Practice.
- PSoCG - Planning Statement of Common Ground signed by EBC and JCR.
- SoC – Statement of Case
- TA - Transport Assessment prepared by TPP and submitted as part of the planning application.
- TSoC - Transport Statement of Case prepared by TPP and submitted on behalf of JCR.

1.5 Highways and Transportation Reasons for Refusal

First reason for refusal

The proposed development represents inappropriate development in the Green Belt which would result in definitional harm and actual harm to the openness of the Green Belt and it is not considered that the very special circumstances required to clearly outweigh the harm to the Green Belt and any other harm, including impact on transport (highway and public transport capacity), air quality and insufficient affordable housing provision, have been demonstrated in this case.

The First reason then refers to the requirements of the NPPF, Policies CS21 and CS25 of the Elmbridge Core Strategy 2011, Policies DM5, DM7 and DM17 of the Elmbridge Development Management Plan 2015.

Fifth reason for refusal

- 1.5.1 This referred to the lack of a legal agreement to secure funding towards the transport improvements. The intention is to agree this before the public inquiry as set out in the Councils SoC (paragraph 5.2).

2 EXISTING SITUATION AND PROPOSED DEVELOPMENT

2.1 Proposed Development

2.1.1 The development proposals broadly comprise:

- Enhancement of existing Racecourse facilities and car parking;
- Demolition of existing buildings and development of approximately 318 dwellings across five sites.
- Development of a 150 room hotel;
- An upgraded children's nursery;
- Improvements to Racecourse access.

2.1.2 The development proposals are described in Section 2.7 of the TSoC. . The Racecourse car parking layout and access arrangements would be significantly improved thereby reducing the impact of race and event day traffic on highways in the Esher area. There would also be a new pedestrian access from Portsmouth Road and significant upgrading of pedestrian routes and facilities on site and in the grandstand. Figures 1 and 2 show the location of the development sites and Racecourse which are close to Esher town centre and the Station.

2.1.3 The proposals also include numerous measures to encourage sustainable transport and improve safety as summarised in Sections 4 and 5 Figure 3 illustrates some of these improvements.

2.2 Existing Situation

2.2.1 The Racecourse and proposed development sites have good accessibility and are in highly sustainable locations. This is confirmed by EBC in the signed PSoCG at paragraph 3.59 which states.

"The majority of the Appeal Site is previously developed land or adjacent to existing development. All proposal sites have good accessibility being in close proximity to Esher District centre and Esher Railway Station. As such, they are highly sustainable locations for the Proposed Development."

2.2.2 The existing transport situation is described below and in section 2.0 of the TSoC.

2.3 Walking

- 2.3.1 The development is located within reasonable walking distance of schools, shops, Esher town centre, bus stops, Esher Station and other amenities. It is therefore well located to encourage walking trips. Figure 2 shows some of the nearby amenities. Section 2.0 of the TSoC provides further details.

2.4 Cycling

- 2.4.1 The development sites are within easy cycling distance of Esher town centre, Esher Station, shops and schools. They are also within cycling distance of nearby towns offering employment, shopping and other services. This is shown in Figure 4 with further details in Section 2.3 of the TSoC. The Bicycle2Work website has been referred to with regard to acceptable cycling distances.

2.5 Bus Services

- 2.5.1 The development sites are well located to encourage travel by bus. There are a range of bus services available to residents that provide access to destinations across the area. The bus services also provide interchange with railway stations and other bus routes, further increasing the destinations that can be reached and providing alternative routes. The local bus network is shown on Figure 5. Section 2.4 of the TSoC provides further details with regard to bus accessibility.

2.6 Rail Services

- 2.6.1 The development is well located to encourage rail travel being within walking distance of Esher Station. The Station is served by South Western Railway with regular services eastbound towards London Waterloo and Clapham Junction and westbound towards Woking. There are also opportunities to interchange with other services, including London Underground, significantly broadening the destinations served.
- 2.6.2 The local rail network is shown on Figure 6. Section 2.5 of the TSoC provides further details with regard to rail accessibility.

2.7 Local Highway Network

- 2.7.1 The main access to the Racecourse is located on the A307 Portsmouth Road. The other roads adjoining the Racecourse and providing access to the development

sites are More Lane, Lower Green Road and Station Road. Figure 7 shows the local highway network and Section 2.6 of the TSoC provides further details.

2.8 Existing Situation Conclusions

- 2.8.1 The proposed development is in a highly sustainable location that will encourage trips by walking, cycling, bus and train. In addition the proposals include numerous measures to encourage sustainable transport, improve safety and reduce the impact of traffic on race and event days.

3 TRIP GENERATION AND TRANSPORT IMPACTS

3.1 Trip Generation

- 3.1.1 The planning application Transport Assessment (TA) was based on “Worst Case” trip rates that significantly overestimated the impact on the road and rail networks. SCC and EBC considered the development on this basis and concluded that it was acceptable. This was in full knowledge of the Council’s policies and those in the NPPF.
- 3.1.2 The “Worst Case” significantly overestimates the number of residential car driver and rail trips in the morning and evening peaks. The reason for this is that the mode split from Census data was used. This only takes account of work trips and misses many of the more local trips to schools and shops which are generally shorter and less likely to be by train and car and more likely to be walking trips and use local bus services. This is considered further in Section 3 of the TSoC.
- 3.1.3 The “Worst Case” overestimates the number of residential car trips by around 160% in the morning and 60% in the evening. The number of rail trips are overestimated by approximately 140% in the morning peak. This is before making any allowance for the proposed sustainable transport improvements.
- 3.1.4 The Worst Case also overestimates the number of car trips to the hotel. The reasons for this are that no allowance was made for removal of the existing Sandown Lodge hotel and also a number of hotels in less sustainable locations and with high peak hour car trips were included in the TRICS data that was used.

3.2 Highway Impacts

- 3.2.1 The development will access the road network at six different points over a wide area which distributes and thereby reduces the impact at any particular location on the highway network.
- 3.2.2 The TA “Worst Case” analysis, which was considered acceptable by EBC, predicted traffic increases of 1.7% to 3.0% in the morning peak and 2.4% to 3.2% in the evening before any allowance for the proposed sustainable transport measures. This is well within daily variations on the local road network which are typically between 5% and 10% and would not be noticeable. Further details are provided in section 3.3 of the TSoC.

- 3.2.3 The “Worst Case” increases in traffic on Portsmouth Road in the morning peak, when the development generates most traffic, would be 53 vehicles per hour two way or less than 1 vehicle every 2 minutes in each direction. There are approximately 1,800 vehicles two way at present on Portsmouth Road. The increase on other roads would be lower, for instance around 1 vehicle every 6 minutes each way on Lower Green Road which has approximately 800 vehicles per hour two way at present.. These increases would be imperceptible.
- 3.2.4 With regard to race and event days there are significant measures proposed as part of the development to improve conditions on the local highway network. These include improving the car park layout and accesses to get cars into the Racecourse site as efficiently as possible and reduce queuing on the external highway network. In addition the Travel Plan will include measures to encourage sustainable modes in place of car travel and the proposed Event Management Plans will contain further measures such as managing the traffic signals in Esher town centre and additional marshals on the road network to direct the flow of traffic.

3.3 Rail Network

- 3.3.1 Following the Case Management Conference, EBC provided further information regarding train services at Esher Station. This information demonstrates there is sufficient capacity on these services even at peak times (and assuming a pre-Covid19 situation is resumed in the future).
- 3.3.2 The “Worst Case” increase in passengers from the development would be approximately than 1 passenger per carriage at peak times. This would not be noticeable. Section 3.7 of the TSoC and Appendix 1 provide further details on rail capacity.
- 3.3.3 I am not aware of any policy to restrict housing or other development in Elmbridge or elsewhere in Surrey due to potential impact on the rail network.

4 SUSTAINABLE TRANSPORT IMPROVEMENTS

4.1.1 The proposed development includes a wide range of measures to encourage sustainable transport. These are described in Section 4.0 of the TSoC and summarised below.

	Location	Measure
1	Lower Green Road	Highway improvements
2	More Lane, Esher Green, Portsmouth Road, Lower Green Road	Bus stop improvements including Real Time Passenger Information, access for all kerbing, shelters, lighting and power
3	Esher Station	Improved pedestrian access from Lower Green Road
4	Portsmouth Road	Three new pedestrian crossings
5	Esher Station	New pedestrian crossing on Station Road
6	More Lane	Footway improvements
7	Station Road/ Portsmouth Road	Footway improvements
8	£300,000 contribution	To release match funding of £3 million for improvements at Esher Station.
9	Travel Plan	Audit contribution
10	Construction Management Plan	Measures to minimise construction impacts
11	Travel Plans for residential, hotel and Racecourse	Measures to reduce car use
11	Car parking and Event Management Plans	Measures to reduce the impact of race days and events on the local area
12	Residential and Racecourse	Electric vehicle charging
13	Local area	CIL contribution £4,553,176.34 that EBC could use to fund additional improvements for pedestrians, public transport and cycling
14	Station Road/ Portsmouth Road	Development designed to provide natural surveillance
15	Portsmouth Road	Landscaped Racecourse entrance would provide a point of interest and improve the pedestrian environment
16	Racecourse	Significant improvements for pedestrians and the mobility impaired
17	Racecourse	Cycle parking for employees, visitors and spectators

4.2 Conclusion

- 4.2.1 The development provides extensive measures to encourage sustainable transport. In addition to encouraging new residents to make fewer car trips these could also reduce the number of car journeys made by existing residents. This supports the NPPF and EBC transport policies.

5 SAFETY BENEFITS

5.1.1 The development would bring a range of safety improvements. These are summarised below and described further in Appendix 2 which has been prepared to address issues raised by third parties but should be taken into account in relation to safety benefits.

5.1.2 The safety benefits of the proposals include.

- New pedestrian crossings.
- Improvements to bus stops.
- New footways.
- Natural surveillance on existing pedestrian routes.
- Improved visibility on More Lane and Lower Green Road.
- Improvements to existing access junctions.
- Contributions to CIL which are able to be used for highway safety improvements in the area.

6 TRANSPORT REASONS FOR REFUSAL

6.1 Introduction

- 6.1.1 This section considers the Council's transport reasons for refusal as set out in the committee report and clarified in their SoC.

6.2 Reasons for Refusal

- 6.2.1 The transport reasons for refusal are set out in the introduction above.
- 6.2.2 The Racecourse proposals were refused by the EBC planning committee in October 2019 despite:
- A recommendation to approve the application by officers of EBC; and
 - The SCC having no objections to the proposals.

6.3 Council's Statement of Case

- 6.3.1 Although the Council's SoC contains limited information about their transport case it does clarify the transport reasons for refusal as considered below.

Policy

- 6.3.2 The Council's SoC at 6.24 and 6.25 states:

"The Council will demonstrate that there will be an adverse, residual, cumulative transport impact albeit not of a "severe" level, but material nonetheless, such that it must be considered in the planning balance at paragraphs 143-144 NPPF".

"The NPPF at paragraph 109 advises that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." However, when considering development within the Green Belt the NPPF is clear that "any other harm" (in addition to harm to the Green Belt) arising from the development must be weighed in the overall balance".

- 6.3.3 Firstly it is clear that EBC accepts there would not be an unacceptable impact on highway safety or impacts on the road network that would normally justify

refusal. However they argue there could be some adverse residual transport impacts that would justify the first reason for refusal. This is despite officers recommending approval at committee in the clear knowledge of the policies in the NPPF and the Development Plan.

Highway capacity

6.3.4 The Councils SoC states at 6.26.

"the Council will show that, even accounting for the proposed mitigation, there would be a residual negative impact on highway capacity arising from the development".

6.3.5 No evidence is provided by the Council to support paragraph 6.26.

6.3.6 However as demonstrated in this Proof, the appendices, the TA and TSoC there would be no noticeable adverse impact on the transport network. Indeed the transport measures associated with development would bring material benefits by improving conditions for walking cycling, bus and rail users. Also there would be safety benefits particularly for pedestrians and vulnerable road users.

6.3.7 The Council's SoC states at 6.31.

"The Council will demonstrate with reference to studies undertaken by the Local Highway Authority therefore that there is congestion in the Local Network. As a network becomes more congested, it becomes more vulnerable to the impacts of minor changes in traffic. The Council will provide evidence with reference to desk top studies to show that some harm to the local network could occur bearing in mind its existing congested state".

6.3.8 No evidence has been provided by EBC to support paragraph 6.31. Indeed at the Case Management Meeting EBC Counsel stated that no further information, except in relation to train services, would be submitted. Therefore, as none has been received, we assume that such studies will not now be referred to.

Sustainable Location

6.3.9 At 6.32 the Council's SoC states.

"The Council will then provide evidence to show that the sustainability of the appeal site has been considered in the context of addressing whether or not severe harm will occur. It is noted that in its response to the application, SCC stated in relation to the location of the site 'In this respect it is considered Sandown Park is a very sustainable location'. However, it is noted that SCC does not have an index to calculate the relative sustainability of an area, and therefore the sustainability is based upon judgement and knowledge of an area. The Council will argue that, given the proximity of the site to a London Borough (approximately 3km) the TfL PTAL calculation provides a suitable indicator of the relative sustainability of the site to understand whether there is likely to be a material change in travel behaviour".

6.3.10 Firstly EBC were aware of the policies in the NPPF when they recommended approval of the application. In addition the Planning SoCG, signed by EBC, at paragraph 3.59 states

"All proposal sites have good accessibility being in close proximity to Esher District centre and Esher Railway Station. As such, they are highly sustainable locations for the Proposed Development".

6.3.11 The comments on sustainability in the EBC SoC have therefore been superseded. Nevertheless, I shall address the points in the EBC SoC. Public Transport Accessibility Level (PTAL)

6.3.12 The SoC is the first time that EBC has suggested PTAL could be used to measure sustainability.

6.3.13 As far as I am aware, PTAL is not found as a measure of sustainability in any EBC or SCC policy document or report to committee nor adopted as a measure for development control purposes. It therefore has no legitimate foundation for use in Surrey.

6.3.14 I add the following:

- PTAL takes no account of walking and the proximity to important local services such as schools, shops, community facilities and employment. PTAL is not therefore a measure of relative sustainability.
- As with walking, cycling is not included in PTAL.
- PTAL only considers public transport accessibility in London areas and has arbitrary cut off points that make no allowance for stations beyond 960m walking distance and bus stops beyond 640m. On this basis Esher town centre and much of the surrounding area are deemed not to benefit from their proximity to Esher Station which is clearly wrong. PTAL is not therefore suitable for use in areas such as Esher or in Surrey. The PTAL “cliff edge” effect is considered further in Appendix 3
- PTAL takes no account of the destinations public transport services serve.

Rail

6.3.15 At 6.35 EBC state that.

"The Council would welcome improvements to the accessibility of Esher Station. However, these proposals seek to address the accessibility of the rail station and not the capacity of the railway services. The Council will present evidence to demonstrate the level of congestion on the rail services stopping at Esher Station".

6.3.16 EBC has now provided this information and contrary to what was said in their SoC this demonstrates that there is capacity on the rail services from Esher Station even at peak times. This is considered in Appendix 1 which has been prepared in response to the Council's SoC.

6.4 Conclusion

6.4.1 The development would not have any adverse transport impacts. Indeed with the proposed transport improvements it would have a positive impact by encouraging sustainable transport, improving conditions for walking, bus and rail passengers, improving safety and providing additional funds for transport

improvements through CIL. Therefore the development supports the policies of EBC and the NPPF and would have a beneficial impact on the existing Racecourse development as well as on the wider local area.

7 THIRD PARTY CONCERNS

7.1.1 There were a range of transport points raised by third parties. These are considered in Appendix 4 with a summary below.

7.2 Increased traffic on race days

7.2.1 JCR do not anticipate any material change in traffic on race days. However, benefits will arise from the proposed development.

7.2.2 The improved facilities and the new family zone could encourage some racegoers to stay longer arriving earlier and leaving later, which would reduce the peak traffic by spreading this over a longer time period.

7.2.3 As a result of the proposed Travel Plans we would expect to see some reductions in traffic.

7.2.4 The proposals include measures to improve the flow of traffic by substantially improving the layout of and accesses to the car parks and the Car Parking and Event Management Plans will include measures to reduce the impact of this traffic on the local highway network.

7.3 Car parking

7.3.1 The proposed car parking accords with the Council's standards and provides sufficient spaces to accommodate all of the demand on site.

7.4 Traffic Impact of proposed development on local highway network

7.4.1 There will be no noticeable impact from the development as demonstrated in my Proof.

7.5 Safety

7.5.1 The development proposals include measures that would improve safety on the highway network as described in appendix 2.

7.6 Capacity of Trains

7.6.1 EBC has provided additional information that demonstrates there is sufficient capacity on rail services and the impact of the proposed development will be negligible.

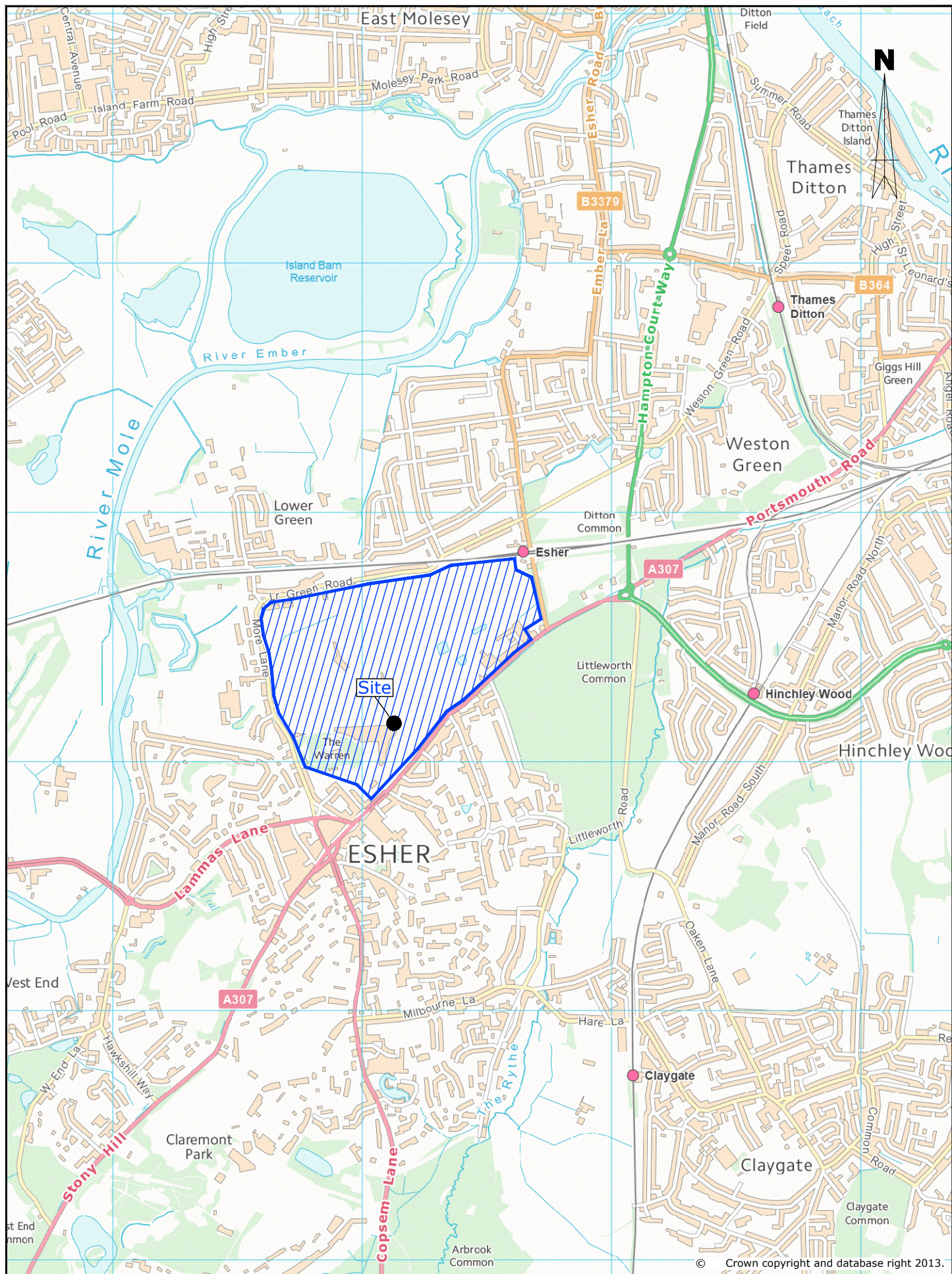
7.7 Submitted Travel Plans are not sufficient

- 7.7.1 The Travel Plans will be worked up with the local authorities as part of the reserved matters for the development.

8 SUMMARY AND CONCLUSIONS

- 8.1.1 The proposed development would not have any noticeable adverse impact on transportation and highways.
- 8.1.2 Indeed with the proposed transport improvements it would have a positive impact by encouraging sustainable transport, providing improvements for walking, rail and bus users, improving safety and providing additional funds for transport improvements through CIL.
- 8.1.3 Therefore the development supports the policies of EBC, SCC and the NPPF and would have a beneficial impact on the local area.
- 8.1.4 It is for the above reasons we believe the transport impacts should be considered as one of the reasons in favour of allowing the development.

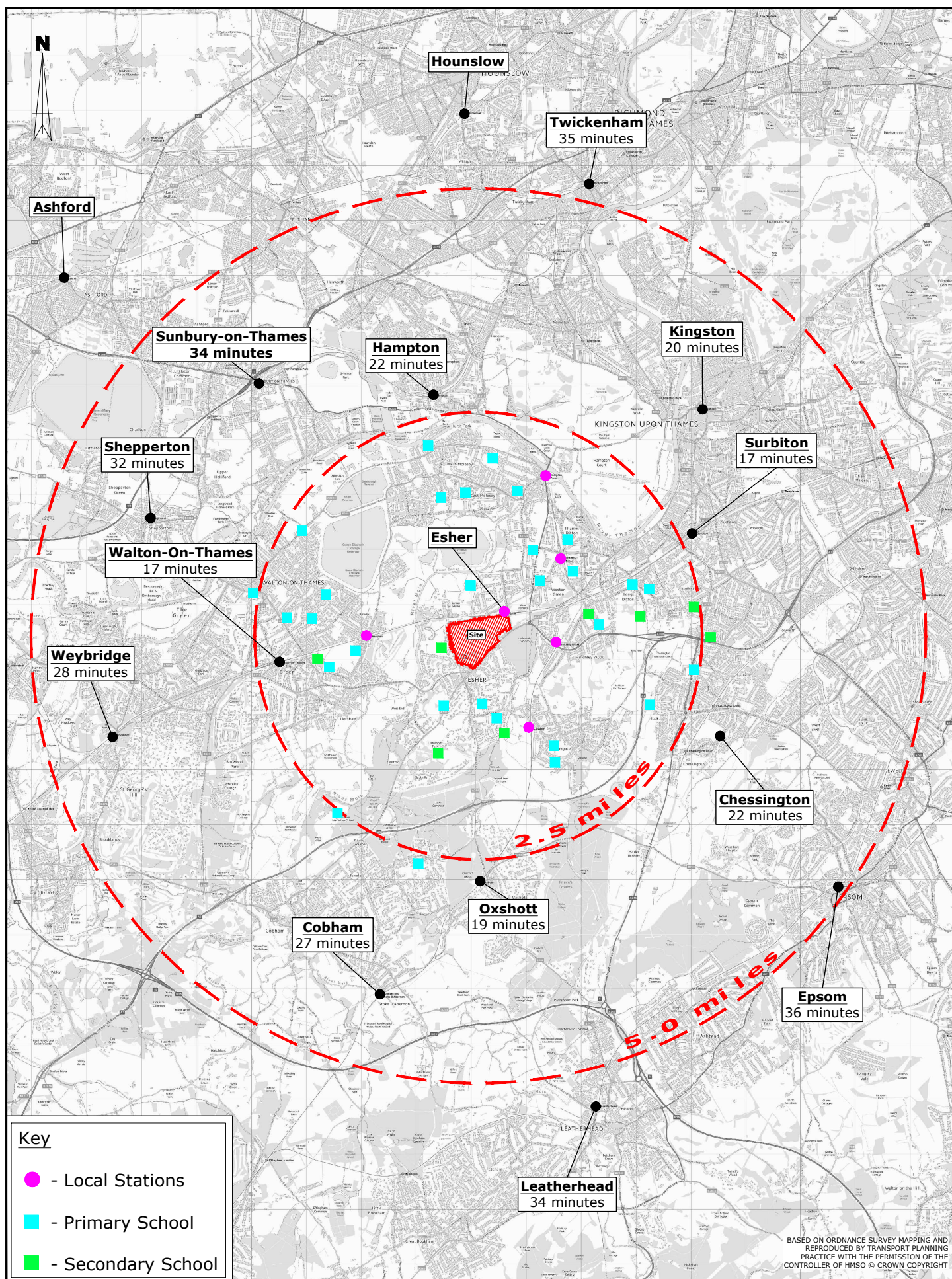
Figures



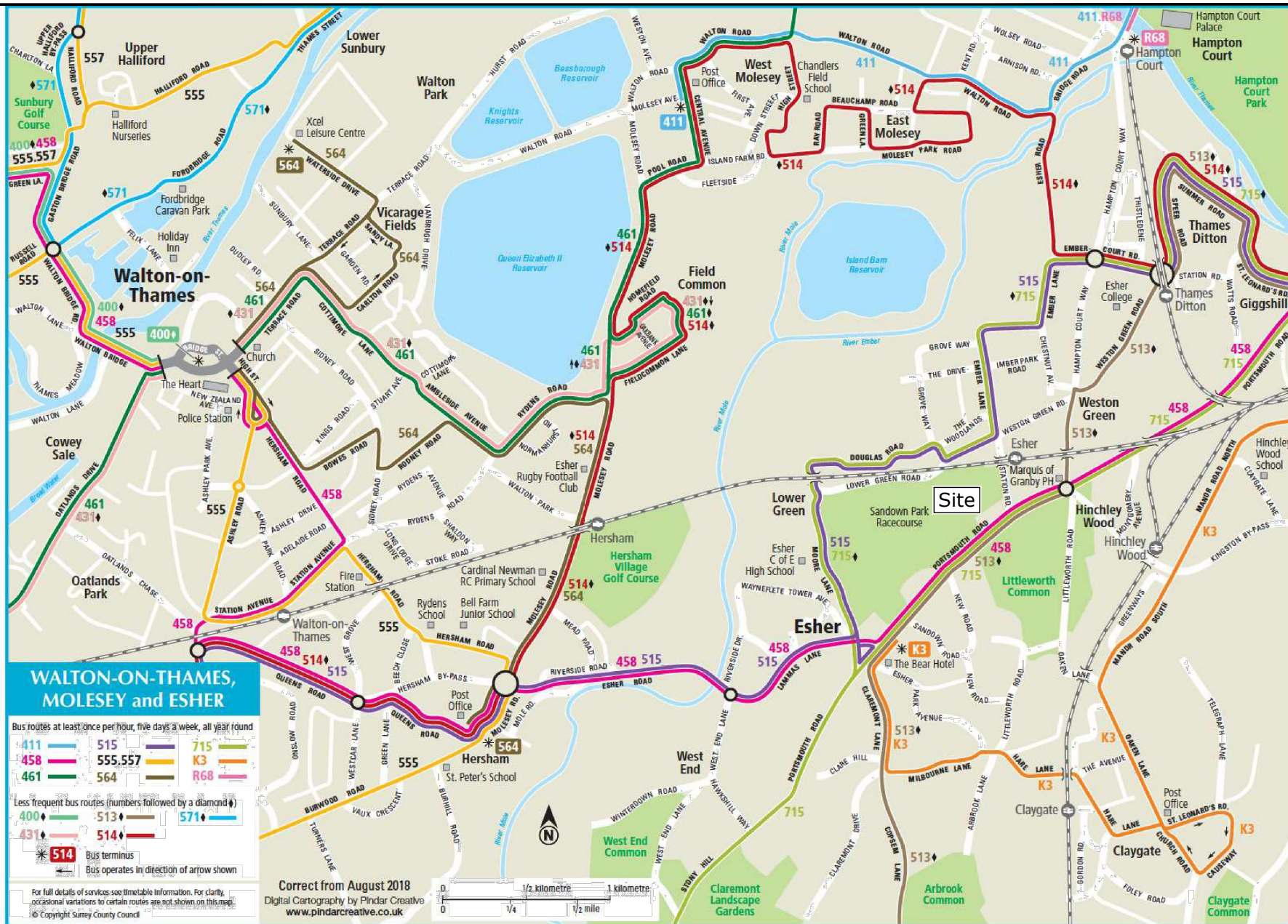
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Site location plan

Figure 1



Sample cycle times to nearby towns



Local bus network

Figure 5

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Local highway network

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