

Sandown Park Racecourse

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Transport Proof of Evidence by
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MIHT CEng Draft
JCR5/2 Summary of Transport
Proof

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1 INTRODUCTION

1.1.1 My name is Michael Lewin. I am a Director of Transport Planning Practice and have over 30 years' experience in transport planning and traffic engineering.

1.1.2 Having been involved in the evolution of the proposals over a number of years, I can confirm that the proposed development is in a highly sustainable location and would have positive transport impacts when the measures to improve safety and sustainable transport are taken into account.

2 EXISTING SITUATION

2.1 Accessibility

- 2.1.1 The Racecourse is in a highly sustainable location as confirmed by Esher Borough Council (EBC) in the signed Planning Statement of Common Ground (SoCG) at paragraph 3.59.

"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 Walking

- 2.2.1 The development sites are located within reasonable walking distance of schools, shops, Esher town centre, bus stops, Esher Station and other amenities. They are therefore well located to encourage walking trips.

2.3 Cycling

- 2.3.1 The development sites are within easy cycling distance of Esher town centre, Esher Station, shops and schools. They are also within reasonable cycling distance of nearby towns offering employment, shopping and other services.

2.4 Bus Services

- 2.4.1 The development sites have access to a range of bus services that provide access to destinations across the area.

2.5 Rail Services

- 2.5.1 The development is within reasonable walking distance of Esher Station. The Station provides regular services towards London and Woking with opportunities to interchange with London Underground.

2.6 Local Highway Network

- 2.6.1 The main access to the Racecourse is from 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.

3 TRIP GENERATION AND TRANSPORT IMPACTS

3.1 Trip Generation

- 3.1.1 The planning application Transport Assessment was based on a “Worst Case” that significantly overestimated the number of road and rail trips. The “Worst Case” overestimated residential car driver trips by 157% in the morning and 64% in the evening peak. This is before making any allowance for the proposed sustainable transport improvements.
- 3.1.2 Surrey County Council (SCC) and EBC officers considered the development on this basis and concluded that it was acceptable.

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 number of cars at any particular location. Even the “Worst Case” analysis predicted traffic increases well within existing daily traffic variations, . In the “Worst Case” the development would add approximately 1 vehicle every 5 minutes in each direction at peak times on Portsmouth Road. These increases would not be noticeable.

3.3 Rail Network

- 3.3.1 EBC has provided information regarding train services at Esher Station. This demonstrates there is sufficient capacity on these services even at peak times. The development would add approximately one passenger per carriage at peak times.

4 SUSTAINABLE TRANSPORT IMPROVEMENTS

4.1.1 The development includes a wide range of measures to encourage sustainable transport including new pedestrian facilities, real time information at bus stops and improvements at Esher Station.

5 SAFETY BENEFITS

- 5.1.1 The development would bring a range of safety improvements including, new pedestrian crossings, level boarding at bus stops, new footways, natural surveillance on pedestrian routes and highway and pedestrian improvements on More Lane and Lower Green Road.

6 TRANSPORT REASONS FOR REFUSAL

6.1.1 Two of the reasons for refusal relate to transport matters as summarised below.

First reason for refusal

.....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.....

Fifth reason for refusal

6.1.2 This referred to the lack of a legal agreement for funding towards the transport improvements. The intention is to agree this before the public inquiry.

6.1.3 The Racecourse proposals were refused despite a recommendation to approve the application by officers of EBC and SCC having no objections.

6.1.4 Although the Council's Statement of Case contains limited information about their transport case it does clarify the reasons for refusal.

6.1.5 Paragraph 6.24.

"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".

6.1.6 Firstly it is clear that EBC accepts there would not be an unacceptable impact on highway safety or the road network that would normally justify refusal.

6.1.7 Paragraph 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".

6.1.8 No evidence is provided to support paragraph 6.26.

However as demonstrated in my evidence there would be no noticeable adverse impact and the transport measures associated with the development would bring material benefits by improving safety and conditions for walking, cycling, bus and rail users.

6.1.9 Paragraph 6.31.

"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".

6.1.10 No evidence has been provided to support paragraph 6.31.

6.1.11 Paragraph 6.32.

"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.....

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".

6.1.12 Firstly EBC were aware of the policies in the NPPF when they recommended approval of the application. Also the signed Planning SoCG confirms that the development sites have good accessibility and are in highly sustainable locations.

6.1.13 Further PTAL is not a suitable measure of relative sustainability. This is because it takes no account of walking and cycling and the proximity to important local services. PTAL only considers public transport accessibility and even then is not suitable for use in as Esher. This is because it has arbitrary cut off points that for instance assume Esher town centre gets no benefit from its proximity to Esher Station.

6.1.14 Paragraph 6.35.

"The Council will present evidence to demonstrate the level of congestion on the rail services stopping at Esher Station".

6.1.15 EBC has now provided this information and contrary to paragraph 6.35 this demonstrates there is sufficient capacity on rail services from Esher Station, even at peak times.

7 THIRD PARTY CONCERNS

7.1.1 There were a range of points raised by third parties as summarised below.

7.2 Increased traffic on race days

7.2.1 The proposals include measures to reduce race day traffic and improvements to the car parks and access that would improve traffic flow.

7.3 Car parking

7.3.1 Sufficient parking is provided to accommodate all of the demand on site.

7.4 Traffic Impact of proposed development

7.4.1 There will be no noticeable impact from the development.

7.5 Safety

7.5.1 The development includes measures to improve safety on the highway network.

7.6 Submitted Travel Plans are not sufficient

7.6.1 The Travel Plans will be worked up and agreed with the Council's.

8 CONCLUSIONS

- 8.1.1 The proposed development is in a highly sustainable location, as agreed with SCC and EBC officers.
- 8.1.2 It would have no noticeable adverse impact on transport.
- 8.1.3 Indeed with the proposed transport improvements it would have positive impacts by encouraging sustainable transport, providing improvements for walking, rail and bus users, improving safety and providing additional funds for transport improvements through CIL.
- 8.1.4 Therefore the development supports the policies of EBC, SCC and the NPPF and would have a beneficial impact on the local area.
- 8.1.5 It is for the above reasons we believe that transport should be considered as one of the positive benefits of the development.



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