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Dear Sirs,

Planning Application DM/21/014/04/FPA

Address: Leamside Equestrian Limited Stud and Equestrian Centre, White House Farm, Pit House Lane, Leamside, Houghton the Spring.

Proposal: Engineering operations to create a football centre incorporating the creation of 20 no grass pitches (Use class F"), demolition of existing stable block, creation of new building to provide changing facilities, creation of car parking and widening of existing access track.

Response: The Parish Council has already submitted 3 letters of objection to this proposal in June 21, then again in January 22 and March 22 when further information was provided by the applicant.

On review of the amendment to the application and further supporting information submitted, the Parish Council remains strongly opposed to this proposal and makes the following additional comments.

Transport Assessment Addendum

1. A timescale for the implementation of the proposed signalling of the A690 Lambton View junction has still not been determined. Even when it does eventually become operational this will not reduce the demand at this junction, just manage it more safely. It is not acceptable that determination of this application be considered before the signalisation is operational. Even when the signalisation is in place on the A690 it will not reduce residents existing concerns about traffic volumes and speeding down Station Road and along Pit House Lane, which is already set to increase due to existing planned developments in the village. If this development were to proceed this would further exacerbate residents' concerns.

2. There has been no assessment carried out of the impact the significant increase in traffic will have on the 2 main roads through West Rainton which run parallel to the A690 and lead on to Station Road. This significant omission is of concern given existing volume and speeding concerns. (Some speeding data gathered by Durham Police had been included in our response dated June 21.) The increase in vehicles that will enter West Rainton from the other 2 junctions off the A690 will have a significant impact on the road safety of these 2 roads and a consequential impact on Station Road that has not been properly addressed.
3. Outdated or incomplete data has still been used in arriving at conclusions regarding the impact on the local road network and road safety in that:
 - a. 2011 Census data has been used to predict traffic distribution.
 - b. The latest crash data is from 2019. Whilst it is noted Highways England advised that collision data should cover the most recently available complete 5-year period, excluding 2020/21 date due to the impact of Covid. Surely data relating to at least the first 8 months of 2022 could have been included to provide some more meaningful up to date information.
 - c. Data used to determine the trip generation associated with the proposed development at Leamside is still based on 2017 survey undertaken at the existing site. This data is not based on actual usage of the Newbottle site operating with 12 pitches. It is based on a survey undertaken 8/7/2017, based on 6 pitches being in operation, to support a planning application submitted to Sunderland City Council in 2017 to extend from 6 to 12 pitches in operation at any time.
 - d. The applicant had advised in their original submission in April 21 that *“due to the Covid-19 situation and its impact on trip generation, activity and vehicle activity, new surveys which would represent a ‘normal scenario’ could not be provided”*. It is not accepted that this is the best data available to demonstrate how the proposed development at Leamside will operate. Surely now 18 months after the initial submission, and after a 5-year period of operating with 12 pitches at the existing site, actual data could and should have been provided by the applicant and used as a basis of the predicted trip generation for Leamside.
 - e. It is also important to note that the Newbottle site and the Leamside site are not comparable in terms of transport sustainability. As a result, more car journeys can be expected at Leamside. This has not been reflected in the trip generation predictions for Leamside.
 - f. The 2017 survey only covered operations on one Saturday and appears to only cover the period 9am until 2pm. It is not known if this day was representative of a competition fixture and there seems to be a lack of certainty about how many staff were on site at the time. The weekend operating hours of the Leamside proposal are 9am to 4pm.

- g. No 11x11 pitch usage was in operation on the day of the traffic survey. It is stated in the Very Special Circumstances Statement submitted in December 21 that, "*pitches can be configured to provide 9 x 9 and 11x11 pitches as they are at Newbottle*". Trip generation predictions should therefore include provision for a worse case scenario when pitches are configured in this way.
- h. No actual midweek evening data was captured through the 2017 survey to demonstrate a "normal scenario" trip generation at other times of operation.
- i. The proposed planning conditions to limit the use of the site, stated at paragraph 7.5 on page 36 of the addendum appear to relate to outdoor pitches only. No consideration appears to have given to limit the use of the indoor facility on a weekend so 15 pitches could be in operation at any one time. This 25% increase is not reflected in the trip generation predictions. The use of the hall for other sports/activities may well generate more trips than the 3 pitches, but again no attempt to predict the impact this may have on trip generation has been made.
- j. No evidence has been provided to support the *expectation* that a maximum of 20 spectators will attend per pitch and no proposals have been made as to how numbers would be monitored and controlled.
- k. No details have been provided of expected usage for the use of the centre during school holidays. Surely a youth football centre of this size will be seeking to provide facilities for young people during school holidays.
- l. No details have been provided of staff numbers/coaches employed, their shift patterns or the number of officials required to be on site to manage fixtures and vehicle movements associated with servicing the facility. This information must be readily available from the operation of the existing site.
- m. This lack of actual and proposed operational data provides little assurance that the predicted trip generation for the Leamside centre, and the impact that this will have on the local highways network, road safety and the local community, is accurate.
- n. It is noted that parking provision of 259 visitor parking spaces, 11 dedicated staff/coach/manager parking spaces, 10 disabled parking spaces and 3 coach spaces is the same as in the original submission, with the exception that 10 staff/coaches spaces were originally proposed not 11. However, it is interesting to note that the basis on which these numbers have been determined has now changed. No explanation has been provided by the applicant as to why this change has been made.

Parking Provision

- a. The original planning supporting statement, paragraph 6.96 states that, "*parking provision has been carefully considered through detailed*

knowledge and experience of the car parking demand at the existing Russell Foster Football Centre at Newbottle". As the Leamside site is not served by a bus route and also includes 3 additional indoor pitches, there is a greater need for parking provision than at the existing site and consequently parking proposals are considered to be inadequate.

- b. The original transport assessment states, the existing Newbottle Centre has *"a central informal parking area of approximately 350 spaces"*. It therefore appears that the existing site demand exceeds provision by 71 spaces, providing overspill parking if needed. Again, this indicates that proposed parking provision at Leamside is inadequate.
- c. The Transport Assessment Addendum has now attempted to demonstrate that parking provision for the Leamside site is more than adequate and provides a similar amount of overspill parking to that at the existing site. It is now stated that, *"parking provisions have been designed to accommodate the predicted weekend vehicular trip generation per hour of 208, whilst providing some element of overspill in the case the number of vehicles is above the expected amount."* Proposed parking provision based on 208 represents a reduction of 72 spaces (35%) from the carefully considered detailed knowledge and experience of the car parking demand referred to in the original statement. This differential is now being portrayed as uplift on expected demand to provide overspill parking should trip generation be more than expected. This would appear to explain why the applicant has changed the basis on which car parking provisions have been determined.
- d. As trip generation for the Leamside site is based on predicted data but the original assessment of parking demand was based on actual data from the existing site, the original determination is considered the more appropriate. Any uplift for overspill parking should therefore be added to the proposed parking provision increasing parking to 350 spaces, as available at the existing site.
- e. A further uplift should then be made to reflect the increased demand for parking from the 3 additional indoor pitches and for the lack of a bus route. Parking provision of around 400 spaces would seem more appropriate. Existing provision is therefore still considered to be significantly understated.
- f. It is also noted from the 2017 survey that reference is made to the inclusion of "drop offs". Whilst vehicles making drop offs have been included in the survey this reference demonstrates that not all users of the facility park on site. Consequently, there will be congestion around the site access, and it is highly likely that cars will seek temporary parking on nearby grass verges.
- g. As mentioned in our letter of objection March 22, it is stated in the letter from Fairhurst, on behalf of the applicant in March 2022, that *one of the objectives of the relocation was to increase parking provision on site*. This implies the provision of 350 spaces at the existing site is

inadequate. Clearly this objective will not be achieved by the parking provision proposed for Leamside.

- h. It is also considered that, in the absence of an updated traffic survey of the existing site, the same uplift should be applied to the predicted trip generation figures to enable a more realistic assessment of the potential impact.

Football Hazard to Road Traffic

- a. It is noted the ball trajectory analysis report prepared by Labosport only covers the risk of a ball landing on the A1(M). Labosport state that *“at the instruction of the client potential risks to Cocken Road on the south side of the site have not been considered in the report.”* Why not?
- b. Six (6) pitches run adjacent to Cocken Road and are much closer to the highway than those covered in the report relating to the A1(M). Furthermore, the assessment totally ignores the potential impact on Pit House Lane. Whilst these are not major roads, the same potential for traffic accidents still applies and that likelihood is potentially higher given their closer proximity to pitches.
- c. Given the very close proximity of pitches to homes along Carr Row there is also a risk of damage to properties, e.g., broken windows and injury to residents. The absence of any acknowledgement or consideration of these potential risks by the applicant is of serious concern.
- d. It is also noted that, the A1(M) trajectory analysis is based on the kicks of 13 years old. The centre is for use for more mature young people up to the age of 18, so predictions of the risk may not be accurate.

Site Lighting

- a. No details of the proposed lighting of the site have been provided or assessed. Paragraph 3.1.4 of the Transport Assessment Addendum states, *“Given the existing facility is not floodlit, the site is limited in terms of offering evening pitch availability and there is currently no indoor facility on the site.”* It is understood flood lighting proposals have always been refused at the existing site by Sunderland City Council.
- b. Whilst it is acknowledged that there are no proposals at present to install floodlighting, this comment clearly demonstrates the applicants desire to be able to offer this facility. This comment increases concerns that if this application was approved, it would only be a matter of time before flood lighting was proposed; especially if the centre followed the national trend to move mini football provision away from turf pitches to artificial pitches.

Compliance Enforcement

- a. There remains no assurance that actual operations in practice at Newbottle adhere to the planning condition of the maximum 12 pitches in operation at any one time. The original transport assessment stated that, "*the site will only operate close to capacity for very limited periods.*" This implies many more than 12 pitches will be in use at any one time.
- b. Planning conditions to limit pitch usage to mitigate the adverse impacts of this proposal are likely to be ineffective in practice. How can compliance with such conditions be effectively monitored by DCC monitoring and compliance officers throughout the entire life expectancy of the operation of the centre? What would be the redress if a breach could be evidenced? The harm will have been done and cannot be retrospectively rectified by any corrective action. The practical difficulty of effective monitoring compliance is highly likely to lead to breaches and more pitches being used than expected increasing all the adverse impacts of this proposal.
- c. Likewise, the Travel Plan is unlikely to reduce the use of cars to any significant or sustainable level given the nature and age of visitors accessing the site and the distances from which they will be travelling.

Conclusions

1. The new information provided has not addressed the issues raised in our previous letters of objections and reinforces the Parish Council's believe of how inappropriate the Leamside site is for this proposed development.
2. Compliance with planning polices relating to development in the Countryside has still not been demonstrated by the additional information provided and this alone should be sufficient grounds for this application to be refused.
3. The continued use of out of date, inaccurate, inconsistent and incomplete information on which assessments and conclusions made by the applicant is a real concern.
4. The timing of the development and submission of this proposal during Covid lockdowns and restrictions in place during 2020/21, would appear to have given an unfair advantage to the applicant to the detriment of the concerns of the local community insofar as:
 - Pre-planning consultation by the applicant with the local community was extremely limited and consisted of leaflet delivery to a few neighbouring properties and the attendance of a representative of the applicants planning consultant at a Parish Council Zoom meeting in October 20. Many questions raised at this meeting could not be answered and requests for further information was not provided in any further pre-planning consultation.

- This relocation proposal of an existing centre which has been in operation for 5 years is predominately based on predictions and expectations when up to date actual information could and should now be provided by the applicant.
 - The transport assessment element is such a key element for consideration given that so many residents, who know the area better than anyone, have expressed such strong concerns about this proposal. This assessment has been restricted by 2 years of more recent data being excluded.
5. The applicant has submitted further information in response to issues raised by National Highways and Durham's Highways Officers but has made no attempt to engage with the local community to listen to their concerns, answer any questions and consider actions to help mitigate those concerns.
 6. Instructions given to consultants to restrict the scope of surveys to only address those issues raised by statutory consultees and the applicant's failure to acknowledge and consider other genuine concerns of the local community, pre-determination of this planning application, provides no confidence that should this proposal be successful any concerns raised once operational will be listened to and appropriately considered and addressed.
 7. It must be stressed that there are no timing issues or other factors that have necessitated this proposed relocation at this particular time to this particular site.
 8. The applicant is choosing to relocate to a totally inappropriate site that will:
 - Not achieve all of the stated objectives for relocating.
 - Be of no benefit to the local community.
 - Result in numerous significant adverse impacts on the local community and amenity.

Signed:



Mark Ramshaw, Parish Clerk, West Rainton Parish Council