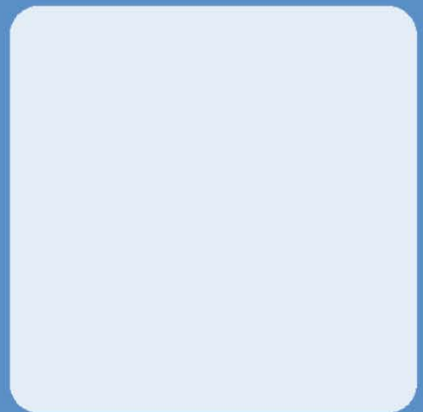
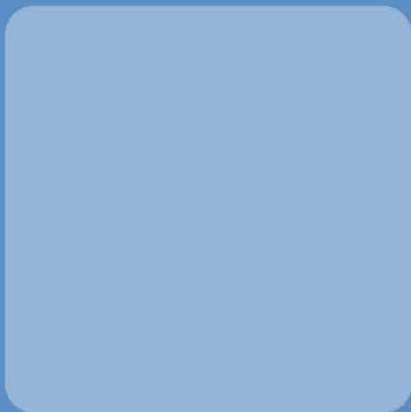
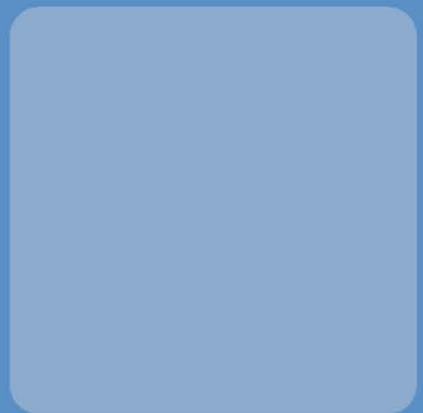
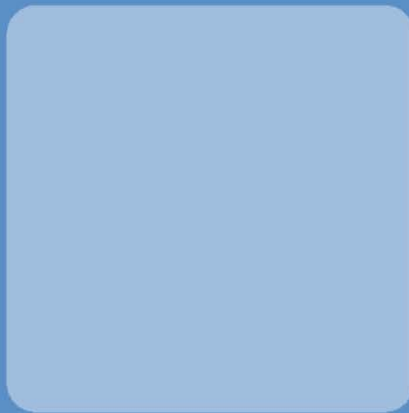


Examination of the Site Allocations  
Local Plan (SALP) –

Statement in response to Matters 2  
and 5 on behalf of Elveden Farms  
Limited



**EXAMINATION OF THE SITE  
ALLOCATIONS LOCAL PLAN (SALP) –**

**STATEMENT IN RESPONSE TO  
MATTERS 2 AND 5**

**STATEMENT BY RPS CGMS ON  
BEHALF OF ELVEDEN FARMS  
LIMITED**

October 2017

**Our Ref: JCG/5783/RT/KEG**

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# QUALITY MANAGEMENT

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# 1. INTRODUCTION

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- 1.1 This statement seeks to amplify the objections previously made by RPS CgMs on behalf of Elveden Farms Limited to the soundness of the proposed Site Allocations Local Plan (SALP) (representation numbers 24764, 24769, 24805); the Infrastructure Delivery Plan (representation number 24772); the SALP Sustainability Appraisal (representation number 24765); and the SALP Habitats Regulations (Screening) Assessment (representation number 24936).
- 1.2 It takes account of the representations made to the Single Issue Review (SIR) Policy CS7 Hearing, where we demonstrated that the submitted SIR is unsound because it provides insufficient housing to respond to market signals; nor provides an appropriate level of affordable housing; nor enables the development of infrastructure required to overcome the significant existing deficit at Lords Walk. It also relies on the Draft Infrastructure Delivery Plan that we consider will not meet the need generated by the planned additional development in the Lakenheath area.
- 1.3 This statement specifically responds to the following matters and issues raised by the Inspector as set out in the Schedule of Matters and Issues for the Examination (14<sup>th</sup> August 2017). These are:

## **Matter 2 – Basis for the Plan**

Issue 2.2 Are the locations identified for development the most appropriate locations when considered against all reasonable alternatives?

Issue 2.4 How have the transportation and infrastructure requirements of the site allocations been taken into account? Has it been demonstrated that there is a reasonable prospect that planned infrastructure will be delivered within the timeframe envisaged? Will this delivery of infrastructure be sufficient to support the anticipated rate of development?

## **Matter 5 – Housing in the Key Service Centres – Lakenheath and Red Lodge**

Issue 5.1 In relation to all of the proposed sites in the key service centres:

Are the criteria in the allocations policies necessary, relevant and deliverable?

Are all the allocated sites deliverable?

- 1.4 Our responses to the above issues and questions will be set out in the following sections.

## 2. MATTER 2 – BASIS FOR THE PLAN

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### Development Locations

2.1 We accept that the proposed locations for development have taken account of a comprehensive Sustainability Assessment (SA) and Habitats Regulations Assessment (HRA). However, as stated in our earlier representations, we consider that the selection process has been based on a number of significant flaws:

- It has not identified sufficient locations for development to meet the full requirements of the District;
- It has ignored the emergence of a large new settlement at Lord's Walk with a significant infrastructure deficit and capacity for a sustainable peripheral expansion to overcome that problem;
- It relies on the Draft Infrastructure Delivery Plan that makes inadequate provision for the road improvements required to support housing growth in the Lakenheath area (see Appendix 1);
- It gives too much weight to the claimed noise advantages of the north side of Lakenheath;
- It gives too much weight to the claimed risk of harm to stone curlew population from the location of development to the west of Lord's Walk (see Appendix 2);and
- It ignores the scope to achieve a small increase in housing on previously developed land at the south end of Icklingham village through a marginal change in the settlement boundary without harm to the adjoining open countryside or the character of the village (see Appendix 3).

2.2 As a result of these flaws we consider the submitted SALP to be unsound.

### Infrastructure Provision

2.3 As we have stated in our previous representations, we consider that the proposed housing target is insufficient to support the required affordable housing or associated infrastructure, and should therefore be increased even above the proposed 5% uplift.

2.4 For this same reason, we also express concern that the proposed uplift figure and housing requirement are insufficient to ensure the critical mass required to enable the development of necessary infrastructure, including social infrastructure.

2.5 No development is proposed to fund investment needed to overcome the infrastructure deficit in the existing settlements. The primary example of this which we have identified is the absence of education, open space, and community facilities accessible to the residents of Little Eriswell which the Council proposed to identify as a separate settlement through the SALP. This issue has been identified in our representation on the SALP (representation number 24785).

2.6 We therefore recommend allocation of the Land to the West of the B1112, Little Eriswell for 550 dwellings, which will secure a primary school and a retail unit, along with associated open and play space, allotments, landscaping and infrastructure works that will serve the residents of Little

Eriswell. Thus we recommended an increase in the overall District housing figure of 550 units to underpin this proposal (please refer to Section 6 for proposed policy change).

### 3. MATTER 5 – HOUSING IN THE KEY SERVICE CENTRES

---

3.1 This section responds to Matter 5 – Housing in the Key Service Centres – Lakenheath and Red Lodge. In relation to deliverability, Site SA7(b) (Land West of Eriswell Road) is supported as a deliverable site within Lakenheath. Furthermore, Land to the West of the B1112, Little Eriswell is identified as an additional deliverable site in the Lakenheath area which is not currently included in the SALP and should be allocated. This section also discusses issues which affect the criteria included in the allocations policy; impact on the SPA, transport infrastructure (specifically the B1112/Eriswell Road Junction) and noise.

#### **SA7(b) – Land West of Eriswell Road**

3.2 RPS CgMs, on behalf of Elveden Farms Limited, support the site allocation of SA7(b), previously identified as L26 within the SALP Further Issues and Options document. This site lies to the south west of Lakenheath, adjacent to the settlement, and comprises an area of 5.35 hectares.

3.3 Lakenheath is designated as a Key Service Centre and is considered in the FHDC Core Strategy to be the only Key Service Centre containing all of the following services: a convenience shop, public transport, health care, primary school and access to employment opportunities. As such, Lakenheath is considered a sustainable location for new housing development. SA7(b) is considered to be the most appropriate location for residential development given its proximity to the services mentioned above.

3.4 There is also potential for the site to form part of a wider scheme to accommodate longer term growth within the Lakenheath area. This would provide residential development alongside the provision of additional community facilities such as allotments, play spaces, sports facilities and green spaces. It is considered that the allocation of this site would provide the opportunity to enable the District to meet the five year land supply targets and deliver a community through the creation of a place that is economically, socially and environmentally sustainable.

3.5 To conclude, the extension to the west of Eriswell Road is supported to reflect the allocation of SA7(b). This site is in a sustainable edge of settlement location, within a reasonable distance of the GP surgery and the existing primary school and is not subject to any specific ecological, landscape or heritage designations. An appropriate layout and design quality will be able to mitigate the limited flood risk issues at the north-west corner of the site and address noise considerations.

#### **Land to the West of the B1112, Little Eriswell**

3.6 As discussed in Section 2, RPS CgMs on behalf of Elveden Farms Limited, recommend allocation of the Land to the West of the B1112, Little Eriswell for residential led mixed use development. An application has been submitted with regard to the site, demonstrating that the proposed residential development is deliverable. The application (LPA Ref: DC/16/1360/OUT) is currently pending a decision. The application proposes 550 dwellings, a primary school and a retail unit, including associated open and play space, allotments, landscaping and infrastructure works in Little Eriswell.

3.7 The review of the sustainability of this site, in relative terms compared to other locations in the Lakenheath area, concludes that the site has a good level of sustainability and can be made to be



more sustainable, both for future residents and the existing residents of Little Eriswell and for the existing Balmcrest site (See Balmcrest/ Lords Walk section of Appendix 1).

#### *Habitats Regulations Assessment*

- 3.8 In connection with the above and as noted in Appendix 2, RPS CgMs on behalf of Elveden Farms Limited object to the Habitats Regulations Assessment of the Site Allocations Local Plan on the basis that the material included within it makes little or no reference to the development being considered at Little Eriswell (ref. DC/16/1360/FUL).
- 3.9 We also wish to address comments raised by the RSPB in opposition to our proposed allocation of Land to the West of the B1112, Little Eriswell. While the RSPB's comments were originally made in relation to the SIR Policy CS7 examination, it was agreed to consider these matters under the discussion of the Little Eriswell site at the SALP hearing.
- 3.10 We consider that there are several flaws in RSPB's representation which we would like to point out to the Inspector. Firstly, there is case law to show that the Local Planning Authority should take the advice of Natural England, unless there is a good justification why Natural England's advice should not be followed; we do not believe that the RSPB's representation provides such justification.
- 3.11 Examples in the RSPB's representation are:
- *“Peer-reviewed research has identified that new housing within 1500m of the SPA leads to reduced stone-curlew nesting densities”* – The research quoted did not study new housing, but studied existing housing and predicted, not identified, reduced densities. As far as we know there have been no studies of stone-curlew nest densities before and after housing development nearby. The report identifies a reduction in nest density only on arable land and not on grassland near to existing housing.
  - *“The impact of housing is to reduce the capacity of the SPA to support the species”* – The HRA submitted with the planning application DC/16/1360/FUL (Land at Little Eriswell) clearly showed that the capacity of the SPA to support stone-curlew would be increased through the habitat quality improvement proposed to mitigate for impacts on nest sites primarily outside the SPA. Natural England's computer model, based on the research quoted by RSPB in its representation, was used to predict impacts and therefore the amount of habitat quality improvement needed in the SPA could be calculated; it was shown that mitigation would be over provided. There is no doubt that the Little Eriswell scheme would increase the capacity of the SPA to support stone-curlew, not to reduce it.
  - Natural England's recommendation that provision of improved habitat within the SPA can be considered as mitigation for the adverse effect is flawed, as this does nothing to avoid the permanent damage still occurring. As mentioned above, stone-curlew nests which might be displaced by the Little Eriswell scheme are outside the SPA so no permanent damage would occur to the SPA.
  - If mitigation as discussed above was a satisfactory solution to avoiding the adverse effect on the SPA, there is no evidence that the SPA has the capacity to provide this. Evidence for how the Little Eriswell development could increase the capacity of the SPA was included in the ecological information submitted with the planning application.

- 3.12 Please note that our comments relate to the Little Eriswell development which is subject to planning application DC/16/1360/FUL and no comments are made regarding RSPB's representation regarding the Brandon development.
- 3.13 We also note that Elveden Farms has applied for planning permission for other developments within the Breckland SPA where the views of the RSPB appear not to be consistent with its current representation. For example, RSPB responded with an offer to contribute to the ecological mitigation process for a solar farm on arable land within the SPA (DC/13/0801) to benefit stone-curlew. RSPB also strongly supported proposals for the creation of grass heath habitat that is suitable for nesting and foraging by stone-curlew, as part of restoration of a gravel pit in the SPA (SE/2012/0782/CR3) thus demonstrating that this type of mitigation can be successfully carried out to benefit the SPA.

#### **B1112/Eriswell Road Junction**

- 3.14 The Highway Authority considers that the existing B1112/Eriswell Road junction (also known as the Sparks Farm junction) is already at capacity and must be improved prior to allowing any development to proceed in Lakenheath. Suffolk County Council has selected one of two junction improvement options, based on the AECOM Cumulative Impact Study (2016).
- 3.15 Work undertaken by WSP on behalf of Elveden Farms Limited shows the AECOM assessment to be flawed, and the selected junction design to be inadequate and unsafe. Therefore any reliance upon the AECOM assessment renders this element of the Local Plan unsound (please refer to Appendix 1).
- 3.16 No new land in Lakenheath to support growth is deliverable without the appropriate highway improvements. Such improvements could be delivered through the alternative junction design which requires land beyond the existing highway boundary, in the ownership of Elveden Farms Limited. This alternative junction design is considered to be essential infrastructure to enable any development to proceed in the Lakenheath area (please refer to Appendix 1).
- 3.17 At the SIR Policy CS7 hearing session on 28<sup>th</sup> September 2017, the issue of the B1112/Eriswell Road junction was discussed in terms of the safety and capacity of the Option B reduced traffic signal junction (confined within the existing Highway Boundary). Suffolk County Council (SCC)/AECOM referred to new traffic assessment work they had undertaken; however, this evidence had not been made available for review as originally promised. At the hearing session on 28<sup>th</sup> September, SCC/AECOM agreed to make the new work available and circulate it as soon as possible such that it could be reviewed prior to the SALP hearing sessions beginning on 16<sup>th</sup> October 2017.
- 3.18 To date, this new work has not been made available, and we therefore maintain our view that the Option B traffic signal improvement for the B1112/Eriswell Road junction is severely compromised in terms of traffic capacity and road safety. There is insufficient land within the existing highway boundary and hence, it is considerably short of being adequate to deliver the Local Plan allocations in Lakenheath and development in neighbouring settlements including Little Eriswell.

3.19 In terms of traffic capacity, WSP's view is in accordance with the evidence submitted by FHDC in the Site Allocation Plan Cumulative Impact Study (Core Document B18, August 2016) which, in relation to the Option B scheme states (paragraph 8.9.6, page 59):

*"8.9.6 The results illustrate that mitigation option B would be ineffective at facilitating the level of proposed growth, with a PRC (Practical Reserve Capacity) of -21.5 in the AM peak hour and -54.7 in the PM peak hour illustrating that the junction would be predicted to operate over capacity in the future year".*

3.20 It should be noted that a Practical Reserve Capacity of -54.7 is not on the margins of failure but is predicted to fail by a very significant margin.

3.21 Reference was also made at the SIR Policy CS7 hearing session on 28<sup>th</sup> September to a Road Safety Audit having been undertaken by AECOM on the Option B scheme. The Road Safety Audit was appended to the AECOM Technical Note concerning the B1112/Eriswell Road junction improvements dated 21 November 2016; however, this document appears to be omitted from the Core Document list therefore relevant extracts of this document are located at Appendix 4.

3.22 The Road Safety Audit (RSA) process comprises an audit by highway safety professionals of a highway improvement design and potential road safety issues are identified. The RSA is then passed back to the designer for a response to the issues raised.

3.23 The RSA (dated October 2016) for the Option B scheme (drawing 60445024-002-SKE-001 Rev D) is located at Appendix C of the 21<sup>st</sup> November 2016 AECOM Technical Note. The RSA identified a number of problems. Notably, under problem D1 it states:-

*"During Stage 1 of the traffic signal control both B1112 arms are given green simultaneously and therefore drivers turning right into Eriswell Road will need to gap-see to make the turn. Although an early cut off for the B1112 southern arm is proposed in Stage 2 of the signals the existing and proposed flow data in the junction modelling suggests that large numbers of drivers turn right at the junction, which is likely to result in ahead (southbound) traffic being forced to wait behind these gap-seeking right turners. This will result in lengthy queueing on the northern arm which is supported by the modelling data. This layout could result in rear end shunts occurring at the back of the northern arm queue and/or potentially driver frustration and subsequently gap-seeking drivers feeling pressured to turn dangerously where they may collide head-on with straight ahead northbound traffic.*

*RECOMMENDATION Investigate whether a right turn storage area could be provided on the northern arm of the junction."*

3.24 The designer's response (dated October 2016) was undertaken by AECOM and is located at Appendix D of the AECOM Technical Note. In response to the RSA problem D1 above it states:-

*"Due to constraints imposed by 3<sup>d</sup> party land adjacent to the junction, it is not possible to provide additional storage to accommodate right turning vehicles."*

- 3.25 The evidence from the AECOM documents alone is quite clear that the Option B scheme confined within the existing highway boundary is not only totally inadequate to accommodate the traffic arising from local plan allocations but also inadequate in terms of road safety.

**Noise**

- 3.26 RPS CgMs object to the Sustainability Appraisal that has been produced by AECOM in support of the proposed Local Plan documents. We consider that the heavy reliance of the Sustainability Appraisal on this single criterion (noise) to justify concentrating the majority of new development in the northern part of Lakenheath village, is flawed. This approach is not consistent with Draft Policy SA8 (Focus of Growth – North Lakenheath) which correctly includes the criteria that any development must include noise mitigation measures.
- 3.27 It is important to note that an Article 31 Holding Direction was issued by the Secretary of State on four planning applications allocated under Policy SA8 North Lakenheath and SA7 Lakenheath in July 2017 on the grounds of noise impacts. The Article 31 Direction was subsequently withdrawn on 18th September 2017 after it was determined that all allocated sites can meet World Health Organisation noise criteria with agreed mitigation measures in place.

## 4. TEST OF SOUNDNESS

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4.1 We therefore consider the Site Allocations Local Plan to be unsound on the basis that the development locations in the Lakenheath areas have been based on a number of flaws as follows:

### **Not positively prepared:**

- Insufficient housing and locations identified to meet requirements of the District;
- Failure to acknowledge the need and capacity for sustainable expansion of existing settlements;
- The proposed housing target and uplift figure are less likely to enable the affordable housing and infrastructure needed than a higher target and figure;
- Reliance placed on the draft Infrastructure Delivery Plan which gives weight to the flawed AECOM Cumulative Traffic Impact Study (2016);
- Reliance placed on the flawed Sustainability Appraisal produced in support of the Local Plan which gives too much weight to noise when justifying development in the Lakenheath area; and
- Reliance on the Habitats Regulation Assessment of the SALP which fails to incorporate vital up-to-date information submitted with recent planning applications.

### **Not justified:**

- An unjustifiably low housing target and uplift figure which will not deliver the affordable housing that is required or justify the infrastructure needed;
- Too much weight is given to noise advantages and claimed risk of harm to stone curlew population in order to justify the location of development;
- Reliance placed on the draft Infrastructure Delivery Plan which gives weight to the flawed AECOM Cumulative Traffic Impact Study (2016);
- Reliance placed on the flawed Sustainability Appraisal produced in support of the Local Plan which gives too much weight to noise when justifying development in the Lakenheath area; and
- Reliance on the Habitats Regulation Assessment of the SALP which fails to incorporate vital up-to-date information submitted with recent planning applications.

### **Not effective:**

- The proposed housing target and uplift figure in addition to the failure to identify infrastructure deficits in existing settlements will not enable sustainable development in line with the NPPF, or with the Council's vision and objectives elsewhere within the Local Plan;
- Reliance placed on the draft Infrastructure Delivery Plan which gives weight to the flawed AECOM Cumulative Traffic Impact Study (2016);
- Reliance placed on the flawed Sustainability Appraisal produced in support of the Local Plan which gives too much weight to noise when justifying development in the Lakenheath area; and
- Reliance on the Habitats Regulation Assessment of the SALP which fails to incorporate vital up-to-date information submitted with recent planning applications.

## 5. PROPOSED AMENDMENTS TO POLICY

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### **New Policy: Land to the West of B112, Little Eriswell**

- 5.1 We believe Land to the West of the B1112, Little Eriswell should be allocated for residential led mixed use development. This development would provide a sustainable development for future residents and enhance the sustainability of the existing settlements of Little Eriswell and Lords Walk.
- 5.2 The following new policy is hereby suggested for the Inspector's consideration:

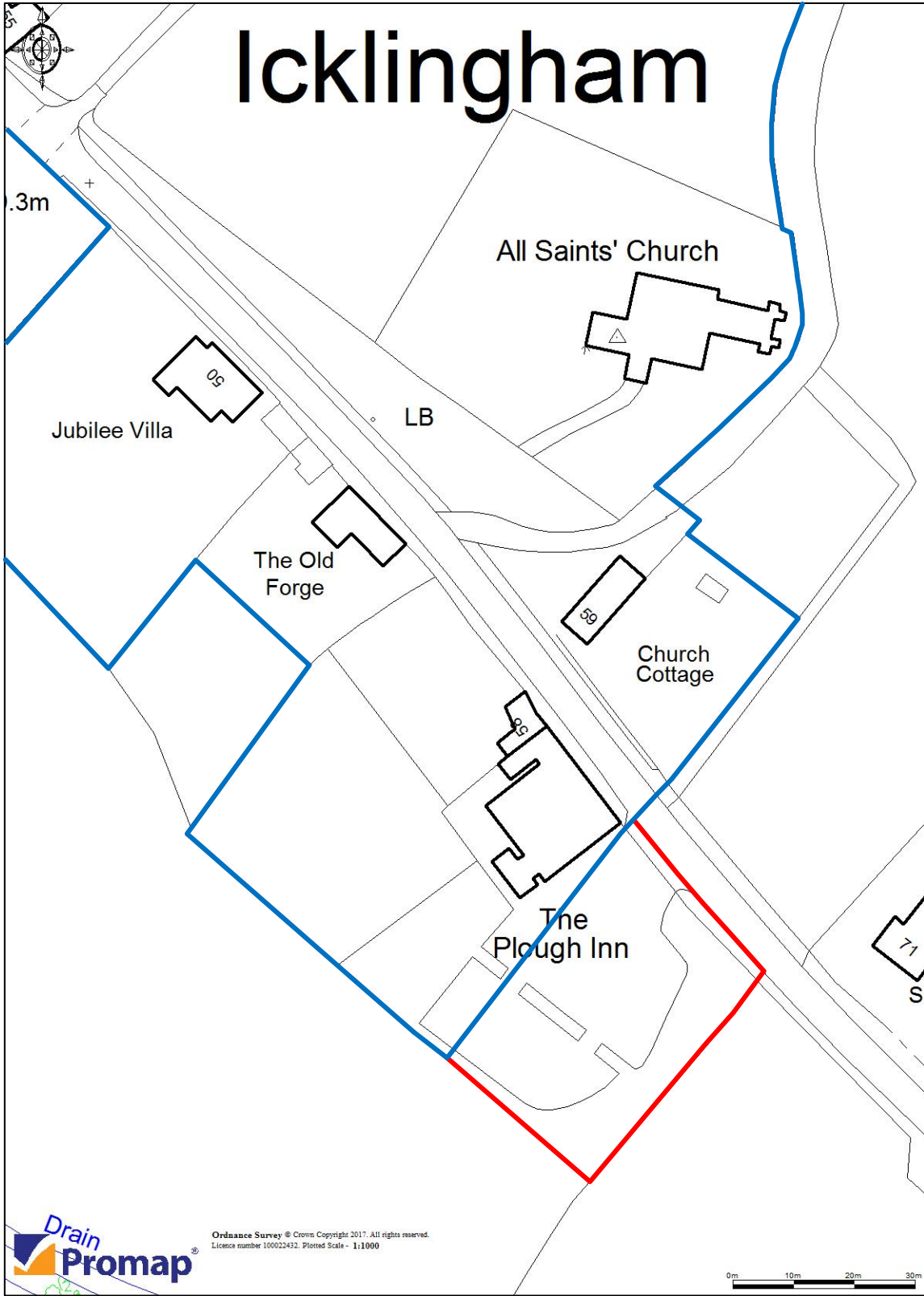
<b>Policy X: Housing and mixed use allocations in Eriswell</b>			
<b>The following sites are allocated for residential and mixed use development in Eriswell</b>			
<b>Reference</b>	<b>Location</b>	<b>Area (hectares)</b>	<b>Indicative Capacity</b>
XX	Land to the West of the B112, Little Eriswell	42.5	Mixed use to include 550 dwellings, a primary school, retail unit and associated open space
<p>The following specific requirements should be met on all sites:</p> <ul style="list-style-type: none"> <li>A) Any development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Maidscross Hill SSSI and Breckland SPA. Measures should include the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development and/or other agreed measures;</li> <li>B) Strategic landscaping and open space must be provided on all sites to address the individual sites requirements and location;</li> <li>C) A substantial buffer next to the Cut-Off Channel, providing semi-natural habitat adjacent to the water course, should be provided where possible in relation to current or future applications;</li> <li>D) Given the proximity to RAF Lakenheath, any proposals for development must incorporate appropriate noise mitigation measures;</li> <li>E) Permission will only be granted where applicants can demonstrate that satisfactory measures to mitigate the cumulative and individual highway impacts of development on the site(s) including specifically on the B1112/Eriswell Road junction can be formally secured and are deliverable.</li> </ul> <p>In addition: Provision will be made for a new primary school on Site X;</p>			

### **Policy SA(7) and Policy SA(8)**

- 5.3 Criterion (E) in Policy SA(7) and Policy SA(8) should be amended to reflect the wording set out in Criterion (E) in the table at paragraph 5.2 above. The additional criterion for a new primary school should also be added.

### **Boundary Changes to Icklingham**

- 5.4 In addition, we request that a marginal amendment be made to the settlement boundary of Icklingham village to include a previously developed site. The site is located to the south of Icklingham and previously formed the car park to a former public house which has been closed for several years. Appendix 3 provides further information.
- 5.5 The plan below shows the suggested amendment to the Icklingham settlement boundary for the Inspector's consideration:



Existing Settlement Boundary —————

Proposed Settlement Boundary Extension —————



## APPENDIX 1 – INFRASTRUCTURE

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### **Balmcrest/Lords Walk**

- A1.1 As stated in Section 2 of this statement, we consider the proposed housing figure insufficient to overcome infrastructure deficit, in particular the significant deficit at Little Eriswell as described in SALP representation number 24785.
- A1.2 Land to the West of the B1112, Little Eriswell, is adjacent to an area of housing that has recently been released from US Air Force (USAF) use into private housing. This area, known as Balmcrest or Lord's Walk, has approximately 600 dwellings and has plans for further infill. This should be considered against the existing Lakenheath village which has around 1700 dwellings (from 2011 Census). It is comparable in size to the Primary Villages of Kentford, West Row and Exning designated in the Core Strategy 2010. In contrast to the designated primary villages, the Balmcrest Estate lacks any significant community facilities or major open spaces.
- A1.3 The Balmcrest area is existing housing that is being taken up by non-USAF residents and therefore is generating a demand for local services. The nearest services cannot be accessed as they are within the US airbase. It is therefore considered that the Little Eriswell proposed development could create a critical mass of housing in the same area as the existing housing to help support the services already there, and provide additional services to be used by new residents and the existing residents of the Balmcrest site.

### **Transport Infrastructure**

- A1.4 RPS CgMs, on behalf of Elveden Farms Ltd, also seek to object to the Draft Infrastructure Delivery Plan, which forms part of the Local Plan for the District. The Draft Infrastructure Delivery Plan seeks to give weight to the AECOM Cumulative Traffic Impact Study (2016) which we consider to be flawed, and therefore any reliance upon it renders this element of the Local Plan unsound.
- A1.5 As background, the Draft Infrastructure Delivery Plan makes reference to and gives significant weight to the highway improvements and mitigation measures as suggested in the AECOM Cumulative Impact Study (2016). The Highway Authority considers that the existing B1112/Eriswell Road junction (also known as the Sparks Farm junction) is at capacity and must be improved prior to allowing any development to proceed in Lakenheath. The AECOM study identifies two traffic signal improvement options for the B1112/Eriswell Road junction, referred to as Option 'A' and Option 'B'.
- A1.6 The proposed Option A is the larger traffic signal improvement and is preferred by the Highway Authority given that it provides significant additional traffic capacity, but it requires land beyond the existing highway boundary which is not deliverable without the agreement of the landowner (Elveden Farms Ltd).
- A1.7 Alternatively, the proposed Option B improvement requires no additional third party land but has much reduced traffic capacity compared to Option A. On the basis of the AECOM study, Suffolk County Council (SCC) have claimed that the reduced traffic signal scheme in Option B can accommodate the traffic arising from around 850 new dwellings in the Lakenheath area. However,

work subsequently undertaken by WSP on behalf of Elveden Farms Limited, concludes that the AECOM study is flawed and that the Option B scheme cannot even accommodate the existing traffic flows, let alone any additional traffic arising from new development. Furthermore, trying to squeeze the improvement within the existing highway boundary has led to an unsafe highways design.

A1.8 In the March 2017 representations submitted by RPS CgMs for Elveden Farms Limited, it was recommended that new comprehensive and representative traffic count data is collected for the B1112/Eriswell Junction and the junction re-assessed with revised traffic capacity modelling to determine if the proposed Option B scheme has sufficient capacity to accommodate traffic arising from new development in Lakenheath. New traffic counts at the junction were undertaken in March 2017 and the results set out in the WSP note dated 21<sup>st</sup> April 2017. The note concludes that even when using the latest March 2017 traffic counts, that the Option B scheme cannot accommodate the existing traffic flows let alone any additional traffic arising from new development without creating a severe traffic impact.

A1.9 The WSP note was reviewed by independent consultants Railton TPC Ltd on behalf of Lakenheath Parish Council and the following conclusion was drawn (letter 7<sup>th</sup> June 2017):

*"I consider that the work undertaken previously by Aecom to be unreliable both in terms of the predictions that have been made of the capacity of the proposed Sparks Farm junction and in terms of its safety. The work undertaken by WSP presents the most up-to-date and reliable basis for assessing the ability of the junction to accommodate new development. I would concur with the general conclusion of the WSP report that traffic flows at the junction are significantly higher than those assumed in the Aecom work and that the proposed improvement will not accommodate traffic associated with any significant new development in Lakenheath".*

A1.10 By utilising the December 2016 observed flows in the Option B junction model, the WSP assessment of the Option B scheme produces a Practical Reserve Capacity of minus 5% in the PM peak, i.e. the proposed reduced traffic signal junction could not even accommodate the December 2016 observed traffic flows. The observed March 2017 flows now show this situation is even worse, in that the PM peak traffic flows that were used by AECOM demonstrate an even greater shortfall of 12% lower than the observed March 2017 traffic flows.

A1.11 When the Station Road development (LPA ref. DC/14/2096/HYB, circa 300 dwellings) traffic flows were added and run through the Option B model (WSP Technical Note, 5th January 2017) the Practical Reserve Capacity of the reduced traffic signal junction was a substantial minus 15.6% with an average queue of 260m southbound on the B1112 and 210m on Eriswell Road.

A1.12 This compares to the equivalent queue lengths for the existing junction of 47m southbound on the B1112 and 150m on Eriswell Road (AECOM Technical Note, 21st November 2016), i.e. the queue lengths on completion of the reduced traffic signal junction and Station Road development will be significantly longer than the existing junction with no improvement. Furthermore, these queue lengths will be even worse using the higher March 2017 PM peak traffic flows.

- A1.13 In terms of road safety, AECOM's own Safety Audit identified that the absence of right turn storage area may result in rear end shunts/side swipe collisions. The junction layout as it stands will give a green light to southbound traffic but without sufficient space for right-turners to wait. This layout is very unusual and will not be expected by the majority of drivers who would usually expect the straight through movement to be clear, further exacerbated by the presence of significant numbers of large cars imported from the US and used by US airbase staff travelling between the two local airbases.
- A1.14 The AECOM Designers Response to the AECOM Safety Audit stated that due to third party constraints at the junction it is not possible to provide storage room to accommodate right turning vehicles. This further highlights that the Option B junction design is compromised in safety terms.
- A1.15 WSP requested a meeting with SCC and AECOM to discuss these concerns. The meeting took place on 1<sup>st</sup> August 2017 and SCC agreed that AECOM would review their previous work in the light of the new traffic data and the concerns raised in terms of capacity and safety. By the SIR CS7 Examination representations submission deadline of 8<sup>th</sup> September 2017, this work had not been made available by SCC.
- A1.16 Notwithstanding the awaited SCC/AECOM review, there is substantial evidence to show that the reduced traffic signal scheme (Option B) confined within the existing highway boundary will result in severe traffic conditions and an unsafe design. The larger Option A improvement using land beyond the highway boundary is therefore essential infrastructure to enable any development to proceed in the Lakenheath area, the absence of which will render the Local Plan unsound.
- A1.17 In summary, current policy fails to address the need to provide the highway improvements that are necessary to accommodate any development in the Lakenheath area. Therefore, no new land in Lakenheath to support growth is deliverable without the appropriate highway improvements which would require land beyond the existing highway boundary.

## APPENDIX 2 – HABITATS REGULATIONS ASSESSMENT

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A2.1 RPS CgMs on behalf of Elveden Farms Limited, seek to object to the Habitats Regulations Assessment of the Site Allocations Local Plan. This objection is formed on the basis of the following points:

- With reference to paragraphs 5.11, 5.12, 6.9, and 6.13 we consider it incorrect to state that the allocation of site SA7(b) could have a potential effect upon Breckland SPA. There has been an application submitted for this site in which the effects of development upon the Breckland SPA have been considered. FHDC resolved to grant planning permission subject to a S106 agreement. This therefore demonstrates that FHDC considers that there would be no likely significant impact of the development on the SPA. On this basis, we consider it wrong for the SALP HRA to ignore this vital information;
- We consider paragraph 6.30 and the adjacent box to be contradictory and we would require more clarification. We would also require confirmation that developers are not asked to fund the ANGST plan implementation as impacts are provided equally by residents of existing and proposed housing.
- With reference to Table 7.2, we agree and support the conclusion that SA7(b) has no adverse effect upon the integrity of the Breckland SPA.

A2.2 To conclude, RPS CgMs on behalf of Elveden Farms Limited, seek to object to the Habitats Regulations Assessment of the Site Allocations Local Plan on the basis that the material included within it makes little or no reference to the development being considered at Little Eriswell (REF. DC/16/1360/FUL). As part of this application, the impacts of development on the Breckland SPA were discussed with Natural England and they expressed satisfaction with the mitigation measures proposed.

A2.3 As a result it is considered that development on this site will have no adverse impact upon the integrity of the Breckland SPA, and so it is recommended that the site should be allocated within the Site Allocations Local Plan.

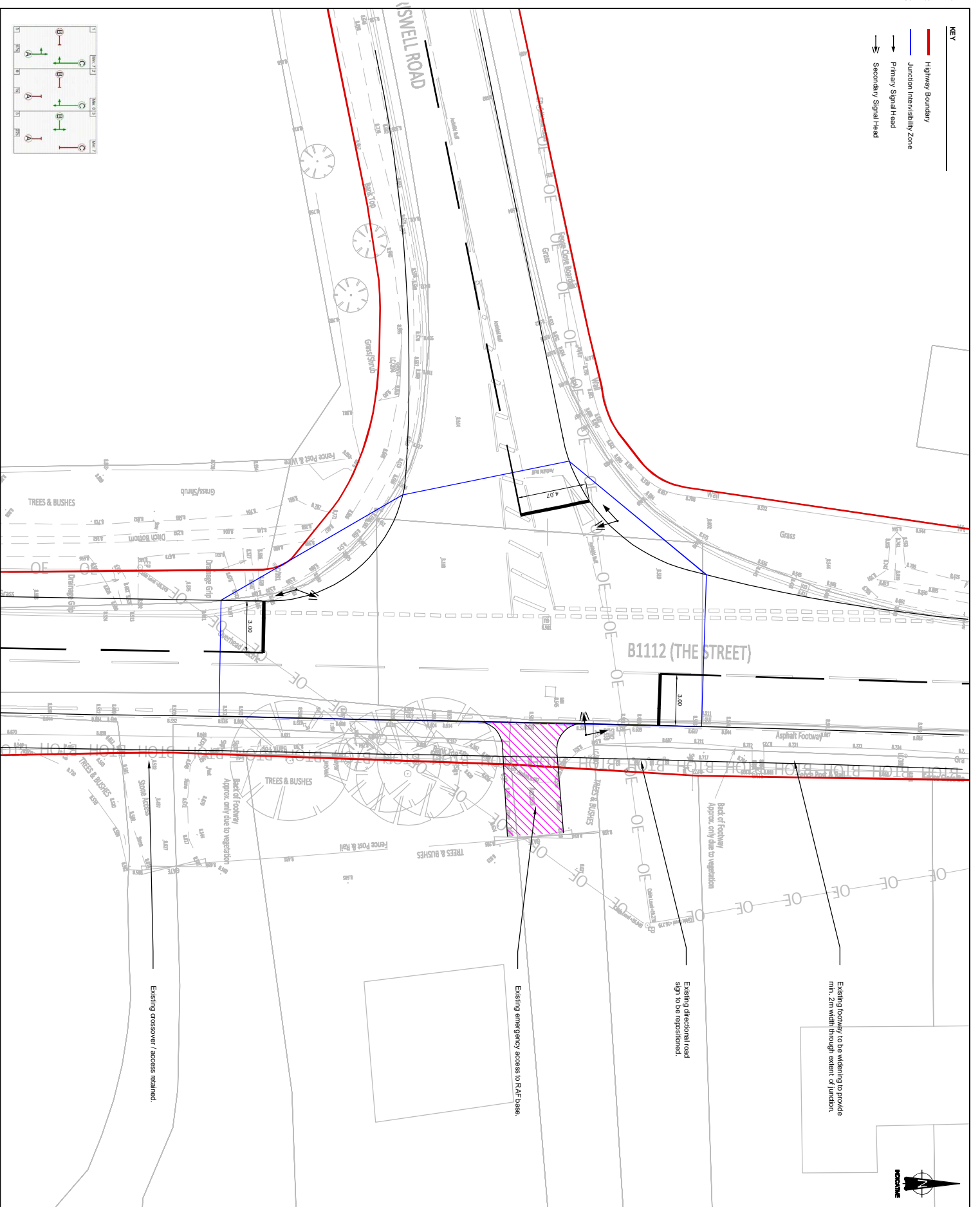
## APPENDIX 3 – ICKLINGHAM SETTLEMENT BOUNDARY

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- A3.1 There is scope for amendments to the settlement boundaries of additional secondary villages, both to address minor anomalies in the existing boundaries and major changes to facilitate development that would underpin the provision of new infrastructure and community facilities that would enhance the sustainability of these settlements.
- A3.2 A minor change should be made to the settlement boundary of Icklingham by extending it to the south east to incorporate land which currently forms the car park for The Plough public house. This small area of previously developed land is in a sustainable, edge of settlement location within a reasonable distance of local services.

**APPENDIX 4 - EXTRACTS FROM AECOM TECHNICAL NOTE  
ON B1112/ERISWELL ROAD JUNCTION IMPROVEMENT**

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**PROJECT**  
 Lakenheath  
 Cumulative Site  
 Traffic Study

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**NOTES**

- The drawing provides a preliminary layout and is subject to Stage 1 Road Safety Audit.
- The drawing is based on topographical survey by Kier Highways dated 06/09/16. Ref: LA13107/ER/LH/TP/001.
- The position of the highway boundary is based on recent information provided by Suffolk County Council.

**ISSUE/REVISION**

ID	DATE	DESCRIPTION
D	02/10/16	REVISED JUNCTION LABELLING
C	28/09/16	REVISED SIGNAL STAGE PLAN
B	14/09/16	CHECKED VERSION
A	07/09/16	FIRST ISSUE
J/R	DATE	DESCRIPTION

**KEY PLAN**

<b>PROJECT NUMBER</b>	60445024
<b>SHEET TITLE</b>	B1112 / Eriswell Road Proposed Signalised Layout Scale 1:100 @ A1
<b>SHEET NUMBER</b>	60445024-002-SKE-0001

# B1112/ Eriswell Road Junction Signalisation, Lakenheath, Suffolk: Stage 1 Road Safety Audit

October 2016



## **B2 PROBLEM**

Location: Southern approach to junction

Drawing No: 60445024-002-SKE-0001 Rev B

Summary: Vegetation and existing sign may obscure forward visibility to nearside signal head

Forward visibility to the proposed location of the nearside signal head may be compromised by future vegetation growth on the nearside verge and/ or by the existing yellow backed sign (to TSRGD 513). This could result in rear end shunt, loss of control or failure to stop collisions occurring as drivers unaware of the traffic signal control ahead fail to brake in time for the signals. As with B1 above, although this approach is subject to a 30mph speed limit vehicle speeds appeared higher on the B1112 and this should be considered in any mitigating measures.

## **RECOMMENDATION**

Relocate the sign and maintain vegetation growth through the life of the scheme to ensure adequate forward visibility in accordance with the 85<sup>th</sup> percentile speeds on this approach; a speed survey is likely to be required to determine this.

## **B3 PROBLEM**

Location: Western approach to junction

Drawing No: 60445024-002-SKE-0001 Rev B

Summary: Vegetation growth on northern side of approach may obstruct forward visibility to nearside signal head

There is substantial vegetation growth on the northern side of the western arm of the junction. This vegetation may obstruct forward visibility to the nearside signal head on this approach. This could result in rear end shunt, loss of control or failure to stop collisions occurring as drivers unaware of the traffic signal control ahead fail to brake in time for the signals. There are a number of existing traffic calming measures on this arm of the junction which suggest that there has been a history of inappropriate approach speeds and potentially collisions etc. on this arm of the existing junction which exacerbate this concern.

## **RECOMMENDATION**

Ensure that sufficient forward visibility to the nearside signal head is achievable on this arm. As with B1 and B2 85<sup>th</sup> percentile speeds at the junction should dictate visibility splays.

## **C NON-MOTORISED USER PROVISION**

No comments.

## **D JUNCTIONS**

### **D1 PROBLEM**

Location: Proposed northern arm stop-line

Drawing No: 60445024-002-SKE-0001 Rev B

Summary: Absence of right turn storage area may result in rear end shunts/ side swipe collisions

During Stage 1 of the traffic signal control both B1112 arms are given green simultaneously and therefore drivers turning right into Eriswell Road will need to gap-peek to make the turn. Although an early cut off for the B1112 southern arm is proposed in stage 2 of the signals the existing and proposed traffic flow data in the junction modelling suggests that large

numbers of drivers turn right at the junction, which is likely to result in ahead (southbound) traffic being forced to wait behind these gap-seeking right turners. This will result in lengthy queuing on the northern arm which is supported by the modelling data. This layout could result in rear end shunts occurring at the back of the northern arm queue and/ or potentially driver frustration and subsequently gap-seeking drivers feeling pressured to turn dangerously where they may collide head-on with straight ahead northbound traffic. See also B1.

## **RECOMMENDATION**

Investigate whether a right turn storage area could be provided on the northern arm of the junction.

## **D2 PROBLEM**

Location: South west corner of proposed junction

Drawing No: 60445024-002-SKE-0001 Rev B

Summary: Junction inter-visibility appears to be compromised

The junction inter-visibility splay in this area appears to overlap, or pass extremely close to, the highway boundary line. As such, the final splay may pass into third party land, which will result in insufficient levels of junction inter-visibility at the junction. This could result in collisions between road users at the junction particularly should the traffic signals fail.

## **RECOMMENDATION**

Amend the layout at detailed design stage to ensure that junction inter-visibility is sufficient around the entire junction.

## **E ROAD SIGNS, CARRIAGEWAY MARKINGS & LIGHTING**

No comments.

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stop collisions. Any vegetation that may encroach on the visibility splays would be cut back during the junction works and would require ongoing maintenance by the Highway Authority.

## **B2 Problem**

Location: Southern approach to junction

Drawing No: 60445024-002-SKE-0001 Rev D (attached in **Appendix B**)

Summary: Vegetation and existing sign may obscure forward visibility to nearside signal head

## **Designers Response**

Refer to AECOM drawing 60445024-002-SKE-0003, attached at **Appendix C**, which illustrates that forward visibility 90m to the proposed location of the primary signal head is achievable within the public highway. Secondary signal heads have are provided in order to reduce the likelihood of failure to stop collisions. Any vegetation that may encroach on the visibility splays would be cut back during the junction works and would require ongoing maintenance by the Highway Authority.

## **B3 Problem**

Location: Western approach to junction

Drawing No: 60445024-002-SKE-0001 Rev D (attached in **Appendix B**)

Summary: Vegetation growth on northern side of approach may obstruct forward visibility to nearside signal head

## **C - Non-motorised User Provision**

No comments.

## **D- Junctions**

### **D1 Problem**

Location: Proposed northern arm stop-line

Drawing No: 60445024-002-SKE-0001 Rev D (attached in **Appendix B**)

Summary: Absence of right turn storage area may result in rear end shunts/ side swipe collisions

### **Designers Response**

Due to constraints imposed by 3rd party land adjacent the junction it is not possible to provide additional storage to accommodate right-turning vehicles. An early cut-off for the B1112 southern arm has been incorporated in order to allow queuing on the B1112 northern arm to clear. It is suggested that the traffic signals are installed with a MOVA control system in order to optimise signal timings and reduce queuing and delay.

Advanced warning signage indicating the presence of the traffic signals and potential vehicle queues will be incorporated on all junction arms. The appropriate position for advanced warning signage would be identified at the detailed design stage following determination of 85th percentile approach speeds.

### **D2 Problem**

Location: South west corner of proposed junction

Drawing No: 60445024-002-SKE-0001 Rev D (attached in **Appendix B**)

Summary: Junction inter-visibility appears to be compromised

### **Designers Response**

The required junction inter-visibility can be accommodated entirely within the public highway. Any vegetation that may encroach on the visibility splays would be cut back during the junction works and would require ongoing maintenance by the Highway Authority.

## **E - Road Signs, carriageway, Markings and Lighting**

No comments.