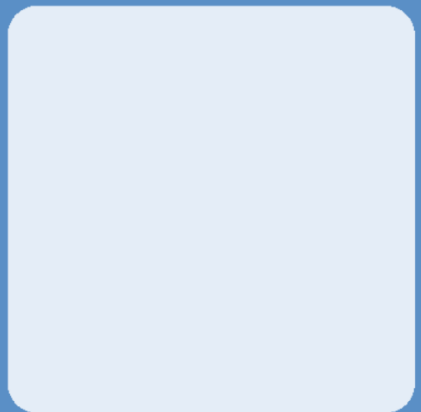


Examination of the Single Issue
Review (SIR) of Core Strategy
Policy CS7 –

Statement in response to Matters 2,
4 and 5



**EXAMINATION OF THE SINGLE ISSUE
REVIEW (SIR) OF CORE STRATEGY
POLICY CS7–**

**STATEMENT IN RESPONSE TO
MATTERS 2, 4 AND 5**

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

September 2017

Our Ref: JCG/5783/RT/KEG

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1. INTRODUCTION

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 Single Issue Review (SIR) of Core Strategy Policy CS7 (representation number 24799) and the Infrastructure Delivery Plan (representation number 24772).

1.2 The 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 (24th July 2017). These are:

Matter 2 – The objectively assessed need for housing and the housing requirement set out in Policy CS7 of the SIR

Issue : The objectively assessed need for housing

2.2 The Council considers the objectively assessed need for housing ('the OAN') to be 6,800 homes for the period 2011-2031. This is an annual average of 340 dwellings.

- c) A 5% uplift has been applied to the OAN to reflect market signals. What is the reason for this?
- d) Why has 5% been selected (rather than a different percentage), and what is the justification for this specific figure?

Issue : The housing requirement set out in Policy CS7

2.3 Policy CS7 says that "provision is made for at least 6,800 new dwellings and associated infrastructure to be delivered in the period 2011 to 2031".

- b) What infrastructure is provided for and how has this provision been made?

2.4 Paragraph 3.8.2 of the adopted Core Strategy says "The 2005 Housing Needs Assessment identifies that in Forest Heath the affordable need is for 259 new dwellings per annum".

- c) Will the housing requirement in Policy CS7 ensure that the need for affordable housing will be met? If not, should the housing requirement be increased?

Matter 4 – The spatial distribution of housing

4.1 How has the distribution of housing set out in policy CS7b been arrived at? In particular:

- a) What factors have influenced the distribution proposed?
- b) What role has the Sustainability Appraisal had in influencing the distribution?

c) Has the distribution of housing been based on a sound process of sustainability appraisal and testing of reasonable alternatives, and is the Sustainability Appraisal adequate in this regard?

4.2 Is the broad distribution of housing set out in Policy CS7 consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy?

Matter 5 – Deliverability (the housing trajectory, infrastructure and viability)

5.2 Is the level and distribution of housing based on a sound assessment of infrastructure requirements and their deliverability, including expected sources of funding? In particular:

a) What are the key infrastructure requirements for the successful delivery of the housing planned?

b) What reassurances are there that these elements can and will be delivered when and where they are needed?

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

2. MATTER 2 – HOUSING REQUIREMENT

- 2.1 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.
- 2.2 We note that whilst the Forest Heath District Market Signals and Objectively Assessed Housing Need (OAHN) (February 2016) recommends an overall housing figure of 6,800 dwellings, it also states at Paragraph 5.7 that FHDC “*should consider if it ought to lift its provision target above 6,800 dwellings*” if it could help deliver required affordable homes. As FHDC have subsequently chosen to accept this figure without any increase, we are concerned that it is insufficient to support the delivery of sufficient affordable housing in the District.
- 2.3 To this end, the proposed uplift figure of 5% appears surprisingly low given the examples listed within Chapter 6 of the OAHN, where Inspectors advised in favour of an uplift in overall housing numbers of 10-30% in order to take account of market signals and also affordable housing need. As such, we wish to raise concern that the proposed uplift figure is insufficient to take into account the affordable housing needs of the District based on the market signals and past trends.
- 2.4 The Council has estimated that the most likely delivery from planned allocations made through the Site Allocations Local Plan is expected to be 27% affordable provision (paragraph 5.5 of the OAHN). However this is not a reasonable assumption. The table in paragraph 2.5 of the FHDC Technical Paper to support the overall housing requirement and distribution for the District (August 2015) confirms that the average affordable housing provision per annum 2007-2014 is 17% of total completions. Between 2011 and 2014, the figure is 22% (paragraph 2.6). These figures are significantly less than the 27% figure which has been adopted by the Council in assessing its needs. The figure of 25% assumes that all allocated sites are capable of achieving the full 30% policy-compliant affordable housing provision making no allowances for viability considerations. This is not a realistic assumption to make. Therefore, and unless the overall housing target is increased, it will not help to deliver the number of affordable homes needed in the District.
- 2.5 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.
- 2.6 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 Site Allocations Local Plan (SALP). This issue has been identified in our representation on the SALP (representation number 24785).
- 2.7 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).

2.8 We set out in the next section of this Statement our comments on how this should affect proposed distribution of housing across the District.

3. MATTER 4 – SPATIAL DISTRIBUTION OF HOUSING

- 3.1 As stated in Section 2, 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.
- 3.2 The proposed site is adjacent to an area of housing that has recently been released from 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.
- 3.3 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.
- 3.4 No specific level has been defined for this settlement within the Settlement Hierarchy, thus we proposed an additional 550 houses should be assigned to the “Other” category within the Policy CS7 distribution table (please refer to Section 6).

4. MATTER 5 – INFRASTRUCTURE

- 4.1 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.
- 4.2 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 allow 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'.
- 4.3 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).
- 4.4 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 design.
- 4.5 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 21st April 2017 are appended to this representation. 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.
- 4.6 The WSP note was reviewed by independent consultants Railton TPC Ltd on behalf of Lakenheath Parish Council and the following conclusion was drawn (letter 7th 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”

- 4.7 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.
- 4.8 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.
- 4.9 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.
- 4.10 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.
- 4.11 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.
- 4.12 WSP requested a meeting with SCC and AECOM to discuss these concerns. The meeting took place on 1st 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 8th September 2017, this work had not been made available by SCC.
- 4.13 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.
- 4.14 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.

5. TEST OF SOUNDNESS

- 5.1 We therefore consider proposed Policy CS7 to be unsound on the basis of the overall net housing provision of 6,800 units over the plan period 2011-31, for the following reasons:
- **Not positively prepared:** the proposed housing target and uplift figure are less likely to enable the affordable housing and infrastructure needed than a higher target and figure;
 - **Not justified:** the proposed housing target and uplift figure are unjustifiably low based on market trends and past housing delivery trends in the District. The proposed amount of housing will not deliver the affordable housing that is required or justify the infrastructure needed; and
 - **Not effective:** the proposed housing target and uplift figure will not enable sustainable development in line with the NPPF, or with the Council's vision and objectives elsewhere within the adopted Core Strategy.
- 5.2 We also consider that the Local Plan is rendered unsound because of the reliance that has been place on the draft Infrastructure Delivery Plan, which gives weight to the flawed AECOM Cumulative Traffic Impact Study (2016). On this basis, it is not positively prepared, justified, or effective.

6. PROPOSED AMENDMENT TO POLICY CS7

- 6.1 We believe provision for a higher overall number of dwellings should be made over the plan period in order to meet affordable housing needs and to meet the general growing housing needs of the District. A higher housing target would also facilitate development that would underpin the provision of new infrastructure and community facilities that would enhance the sustainability of the settlements, where there is the environmental capacity to accommodate such growth.
- 6.2 The following suggested amendments to Policy CS7 are hereby set out for the Inspector's consideration:

Policy CS7 Overall housing provision and distribution			
<u>Provision</u>			
To meet Forest Heath's full and objectively assessed need for housing, provision is made for at least 7,425 new dwellings and associated infrastructure to be delivered in the period 2011 to 2031.			
<u>Broad Distribution</u>			
Development will be brought forward in line with the broad distribution of housing as set out below:			
Settlement	Existing completions and commitments (2011-2016)	Additional provision	Totals
Brandon	59	71	130
Mildenhall	185	1412	1597
Newmarket	291	321	612
Lakenheath	95	828	923
Red Lodge	699	1129	1828
Primary Villages	953	454	1407
Other*	155	550	705
Windfall		225 (25 a year x 9 years)	225
TOTALS	2437	4990	7427
*Other includes completions and commitments within rural areas, secondary villages and small settlements.			
To deliver the broad distribution outlined above, sites will be identified through the Site Allocations Local Plan and/or neighbourhood plans.			

7. ANNEXE – WSP TECHNICAL NOTE (APRIL 2017)

Lakenheath

TECHNICAL NOTE: LAKENHEATH CUMULATIVE SITE TRAFFIC STUDIES: FINDINGS OF NEW TRAFFIC COUNTS AT B1112/ERISWELL ROAD JUNCTION ON BEHALF OF ELVEDEN FARMS LTD

QM

Job Number	Date	Author	Checked	Authorised
50400821	21 April 2017	DAB	ID	DAB

INTRODUCTION

The Lakenheath Cumulative Site Traffic Studies undertaken by Aecom in 2016 concluded that, with regard to the B1112/Eriswell Road junction, the reduced traffic signal improvement confined to within the existing highway boundary would accommodate traffic arising from an additional 850 new houses in the vicinity of Lakenheath.

WSP, and other parties, had identified that the traffic counts undertaken by Aecom which formed the basis of the studies was unreliable and that when representative traffic counts were used the reduced traffic signal improvement would not even accommodate existing traffic flows, let alone any new development.

It was recommended in the WSP Technical Note dated 27 February 2017 that, given the unreliability of the Aecom traffic survey, new traffic data should be collected for the B1112/Eriswell Road junction and the adequacy of the reduced traffic signal improvement assessed based on the new data.

TRAFFIC COUNT DATA

WSP had commissioned an independent traffic count specialist to install automatic traffic count equipment at the B1112/Eriswell Road junction and collect data for a two week period from Tuesday 14 March until Monday 27 March 2017. In the guidance referred to by Aecom (Aecom TN dated 26 January 2017) late March is considered a neutral or average month for traffic flows, which means that on 50% of occasions traffic volumes will be higher. The traffic count results are shown in appendix A.

The results of the traffic counts are shown in figure 1 below for the total traffic movements passing through the B1112/Eriswell Road junction for the following hours:

- 0700 - 0800
- 0800 - 0900
- 1700 - 1800

Weekends, Mondays and Fridays have been excluded.

Lakenheath

TECHNICAL NOTE: LAKENHEATH CUMULATIVE SITE TRAFFIC STUDIES: FINDINGS OF NEW TRAFFIC COUNTS AT B1112/ERISWELL ROAD JUNCTION ON BEHALF OF ELVEDEN FARMS LTD

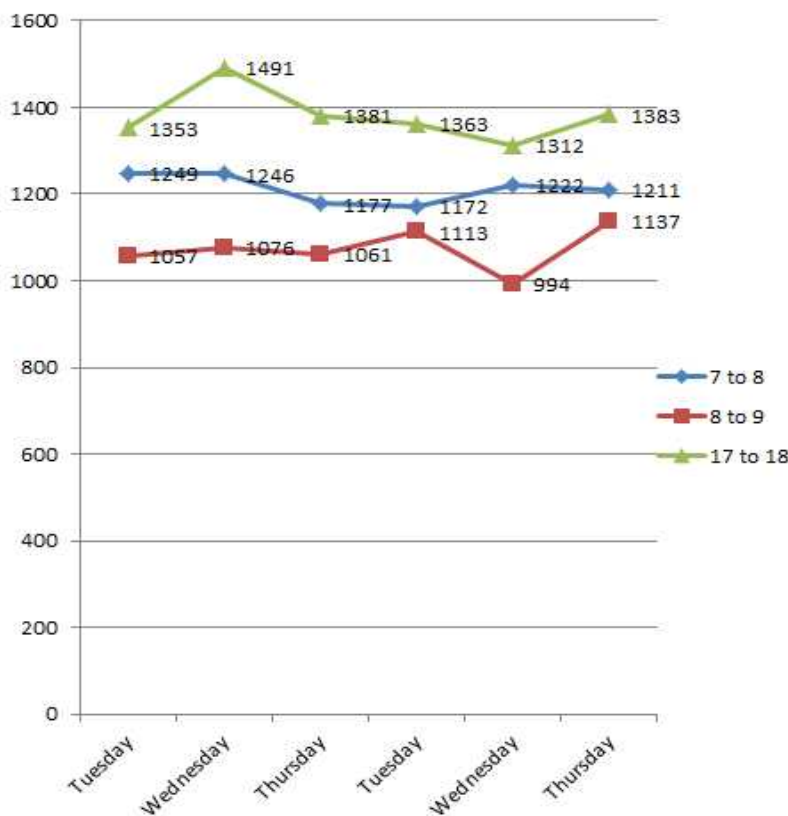


Figure 1 Total Traffic Flows Passing Through B1112/Eriswell Road Junction Late March 2017

The first issue with the Aecom count was raised in the WSP Technical Note as follows:-

“The morning peak hour traffic flows used in the Aecom study is the Monday 0800-0900 with total traffic movements through the junction of 989 vehicles; however, the total movements through the junction the day after on the Tuesday 0700-0800 were 1276 vehicles. That is 29% higher than the traffic flows used in the Aecom Technical Note. The text of the Technical Note at paragraph 3.2 states that the counts were taken during the period 0700-0900 to establish the peak hours. On that basis the peak hour selected should have been 0700-0800 given that traffic flows were 29% higher at on the Tuesday at 1276 vehicles compared to 989 vehicles on the Monday.”

The above graph clearly confirms that the morning peak hour at this junction is 0700-0800 and the traffic flows from this hour should have been selected as the am peak hour for use in the Aecom studies which have significantly underestimated the traffic flows that the junction needs to accommodate.

Given that the new surveys were undertaken in a neutral or average month then the busiest hour of the 6 days should be selected to add some allowance for the 50% of occasions when traffic volumes are higher. Therefore the traffic flows for the morning peak hour should be 1249 veh/hr and 1491 veh/hr for the evening peak hour. The March 2017 data is compared to the Aecom counts in table 1 below.

Lakenheath

TECHNICAL NOTE: LAKENHEATH CUMULATIVE SITE TRAFFIC STUDIES: FINDINGS OF NEW TRAFFIC COUNTS AT B1112/ERISWELL ROAD JUNCTION ON BEHALF OF ELVEDEN FARMS LTD

Peak Hour	Aecom Count September 2016	WSP Count March 2017	Percentage Increase in traffic
Morning Peak Hour	989	1249	+29%
Evening Peak Hour	1330	1491	+12%

Table 1 Comparison of Total Observed Peak Hour Traffic Passing Through Eriswell Road/B1112 Junction Between Aecom Sept 2016 and WSP March 2017 Counts (Veh/hr)

In the WSP Technical Note (dated 5 January 2017) it was identified that the percentage increase in flows from the Aecom Sept 2016 count to the WSP December count was +24% and +9% for the morning and evening peak hours respectively. It can be seen from table 1 above that by using the WSP March 2017 counts the shortfall is even worse at +29% and +12% for the morning and evening peak hours respectively.

It is self-evident from the table above that the counts used by Aecom in their November 2016 Technical Note as a basis for all their conclusions are significantly below the flows that should have been used and will have significantly underestimated the impact of traffic arising from new development on the Eriswell Road/B1112 junction.

In the WSP Technical Note dated 5 January 2017 the Linsig models of the reduced traffic signal junction were run using the WSP December count data and the results were compared to the Aecom models and were set out in Table 2 of the 5 January WSP note which are reproduced below.

	Aecom Traffic Count as Basis		WSP Traffic Counts as Basis	
	Observed Traffic	Year 2020 Plus Station Road North	Observed Traffic	Year 2020 Plus Station Road North
Morning Peak	-	34%	8.9%	-2.7%
Evening Peak	-	2.6%	-5.0%	-15.6%

Table 2 Traffic Capacity of Reduced Traffic Signal Improvement Confined to Public Highway (Practical Reserve Capacity %)

The WSP Technical Note (5 January 2017) concluded:-

*“It is quite clear from the WSP Linsig model results that the reduced traffic signal improvement confined to within the Highway Boundary cannot even accommodate the existing traffic flows with a Practical Reserve Capacity of **negative 5.0%**. With the addition of Station Road North development the Practical Reserve Capacity significantly worsens to **negative 15.6%**”*

The Linsig models of the reduced traffic signal junction have not been re-run using the March 2017 flows as a basis because given that the March 2017 traffic flows are higher than the December flows used as a basis for the results in Table 2 above then the over capacity as identified in the Table 2 will be even worse when using the March 2017 traffic flows as a basis.

CONCLUSION

New traffic counts were collected at the B1112/Eriswell Road junction in late March 2017 which show that the traffic counts undertaken by Aecom in September 2016 and used as a basis for assessment of the

Lakenheath

TECHNICAL NOTE: LAKENHEATH CUMULATIVE SITE TRAFFIC STUDIES: FINDINGS OF NEW TRAFFIC COUNTS AT B1112/ERISWELL ROAD JUNCTION ON BEHALF OF ELVEDEN FARMS LTD

reduced traffic signal improvement are unrepresentative and should be disregarded. As such the conclusion that the reduced traffic signal junction could accommodate an additional 850 houses in Lakenheath should also be disregarded.

It is quite clear from this Technical Note that when using the March 2017 traffic counts that the reduced traffic signal junction cannot even accommodate the existing traffic flows let alone any additional traffic arising from new development without creating a severe traffic impact.

The implication of these conclusions is that any new development in Lakenheath is not deliverable without land beyond the highway boundary needed for the larger traffic signal improvement at the B1112/Eriswell Road junction and this should be understood before any planning consent is granted for new development.

Appendix A

B1112/ERISWELL ROAD TRAFFIC COUNT DATA

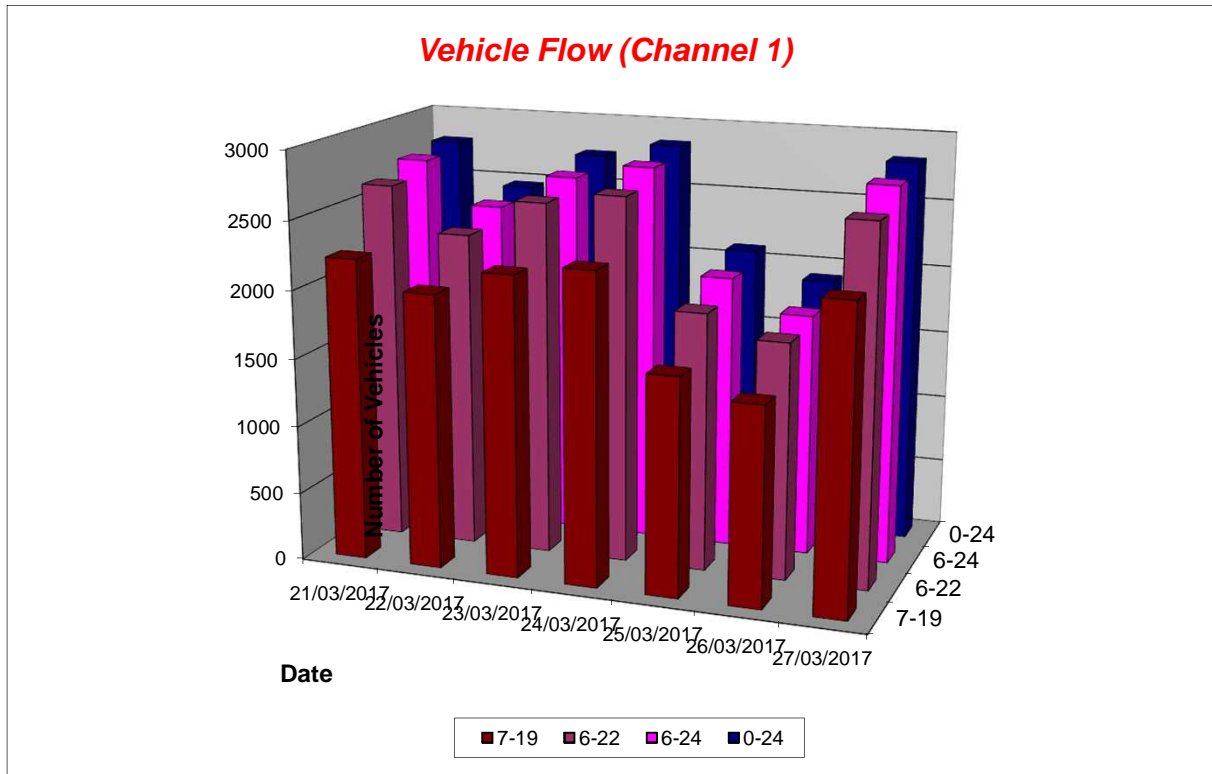
Lakenheath ATC 3, B1112 Southern Site (Week 2)

Channel 1 - Northbound

Vehicle Flow

Week 2

Hr Ending	21/03/2017 Tuesday	22/03/2017 Wednesday	23/03/2017 Thursday	24/03/2017 Friday	25/03/2017 Saturday	26/03/2017 Sunday	27/03/2017 Monday	5 Day Ave	7 Day Ave
1	17	22	11	13	38	55	16	16	25
2	3	1	6	5	17	0	8	5	6
3	2	2	13	4	8	25	3	5	8
4	2	3	5	6	3	25	1	3	6
5	13	4	8	13	8	13	12	10	10
6	14	16	26	27	6	5	24	21	17
7	107	66	73	99	10	20	83	86	65
8	274	260	304	276	33	20	267	276	205
9	191	150	176	171	51	54	161	170	136
10	137	117	123	170	79	57	132	136	116
11	131	88	116	127	122	111	136	120	119
12	107	104	136	114	123	123	111	114	117
13	142	111	132	121	173	145	138	129	137
14	122	134	144	167	195	192	152	144	158
15	175	173	168	166	175	159	178	172	171
16	163	140	155	178	145	150	196	166	161
17	202	192	203	218	166	164	221	207	195
18	314	326	294	317	168	150	302	311	267
19	262	218	246	249	160	125	216	238	211
20	126	108	121	148	109	105	130	127	121
21	97	78	108	74	104	95	90	89	92
22	91	53	91	80	76	62	109	85	80
23	63	57	45	69	77	27	77	62	59
24	31	44	39	39	47	25	61	43	41
7-19	2220	2013	2197	2274	1590	1450	2210	2183	1993
6-22	2641	2318	2590	2675	1889	1732	2622	2569	2352
6-24	2735	2419	2674	2783	2013	1784	2760	2674	2453
0-24	2786	2467	2743	2851	2093	1907	2824	2734	2524



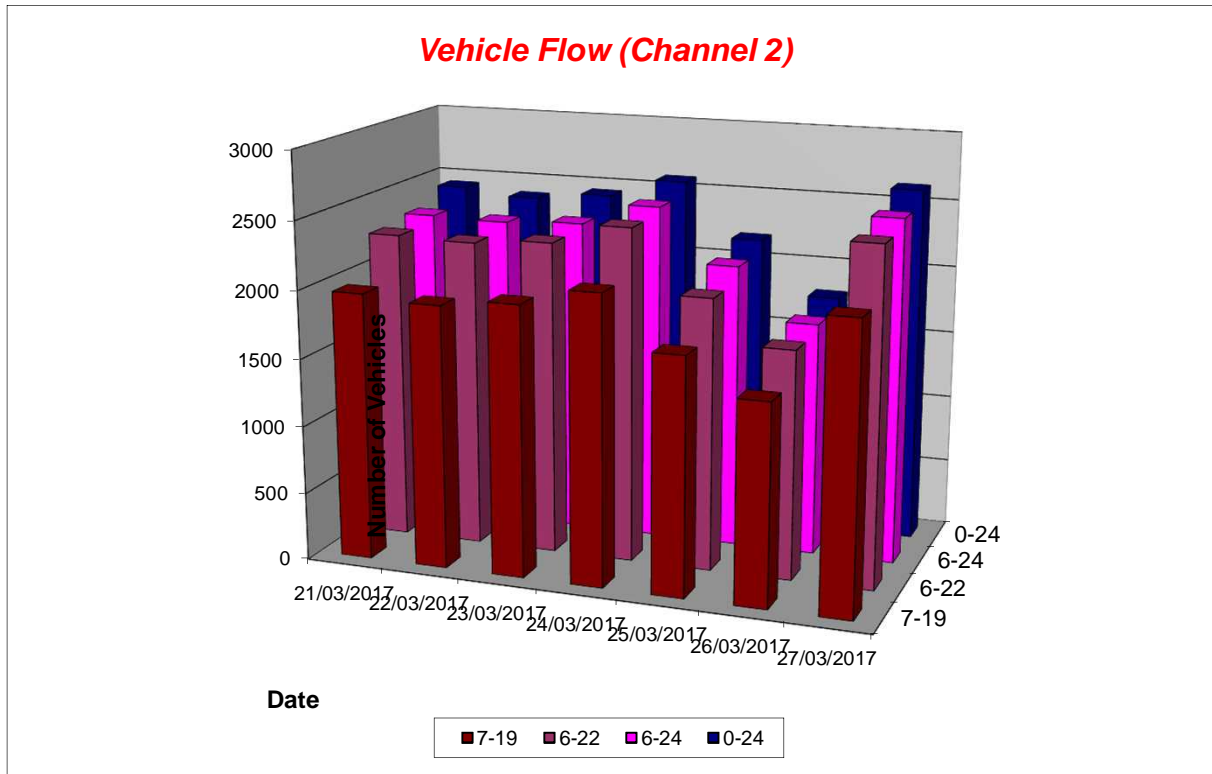
Lakenheath ATC 3, B1112 Southern Site (Week 2)

Channel 2 - Southbound

Vehicle Flow

Week 2

Hr Ending	21/03/2017 Tuesday	22/03/2017 Wednesday	23/03/2017 Thursday	24/03/2017 Friday	25/03/2017 Saturday	26/03/2017 Sunday	27/03/2017 Monday	5 Day Ave	7 Day Ave
1	14	4	12	12	11	13	11	11	11
2	11	4	2	3	25	0	3	5	7
3	3	4	6	8	9	18	1	4	7
4	6	4	2	7	5	5	4	5	5
5	25	18	15	13	10	6	24	19	16
6	58	45	71	44	17	20	53	54	44
7	124	142	125	130	68	34	133	131	108
8	231	241	231	261	87	39	256	244	192
9	219	227	293	232	121	86	227	240	201
10	177	141	153	200	183	122	177	170	165
11	140	162	143	130	198	177	137	142	155
12	142	147	146	133	171	157	164	146	151
13	137	134	132	151	155	193	161	143	152
14	119	121	119	117	166	151	134	122	132
15	125	122	121	151	165	139	145	133	138
16	142	132	154	180	126	111	158	153	143
17	215	178	188	226	113	128	189	199	177
18	183	196	152	174	148	84	175	176	159
19	141	133	158	164	104	86	172	154	137
20	91	108	81	103	95	97	125	102	100
21	54	41	48	67	44	62	71	56	55
22	37	38	60	36	54	14	43	43	40
23	24	31	14	22	55	27	38	26	30
24	17	12	15	19	48	15	26	18	22
7-19	1971	1934	1990	2119	1737	1473	2095	2022	1903
6-22	2277	2263	2304	2455	1998	1680	2467	2353	2206
6-24	2318	2306	2333	2496	2101	1722	2531	2397	2258
0-24	2435	2385	2441	2583	2178	1784	2627	2494	2348



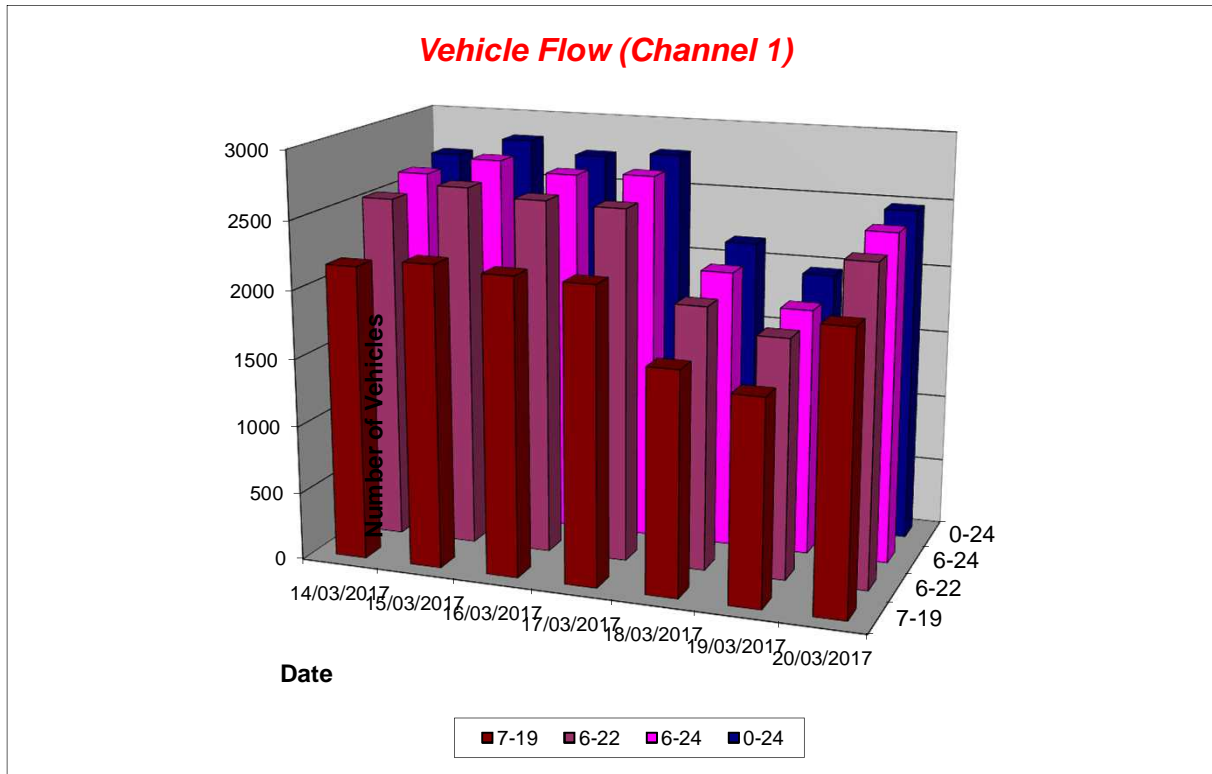
Lakenheath ATC 3, B1112 Southern Site (Week 1)

Channel 1 - Northbound

Vehicle Flow

Week 1

Hr Ending	14/03/2017 Tuesday	15/03/2017 Wednesday	16/03/2017 Thursday	17/03/2017 Friday	18/03/2017 Saturday	19/03/2017 Sunday	20/03/2017 Monday	5 Day Ave	7 Day Ave
1	8	11	6	16	39	44	15	11	20
2	7	6	5	5	21	17	4	5	9
3	7	3	3	2	12	23	3	4	8
4	4	6	4	3	4	23	3	4	7
5	9	11	10	11	12	15	3	9	10
6	22	25	18	23	8	7	18	21	17
7	84	98	106	93	17	16	86	93	71
8	287	280	268	259	28	24	262	271	201
9	168	181	179	159	62	43	147	167	134
10	124	146	142	132	84	60	120	133	115
11	104	132	121	114	129	118	97	114	116
12	134	127	127	103	132	126	108	120	122
13	143	128	130	137	177	154	114	130	140
14	118	144	128	160	203	192	145	139	156
15	173	157	164	176	166	173	172	168	169
16	145	182	155	193	151	162	146	164	162
17	223	197	206	221	174	182	203	210	201
18	304	310	331	315	178	145	318	316	272
19	244	243	239	208	155	127	203	227	203
20	134	146	124	132	114	105	96	126	122
21	83	93	90	88	96	83	69	85	86
22	76	100	98	99	73	54	56	86	79
23	56	65	53	77	68	36	59	62	59
24	35	38	34	54	48	26	29	38	38
7-19	2167	2227	2190	2177	1639	1506	2035	2159	1992
6-22	2544	2664	2608	2589	1939	1764	2342	2549	2350
6-24	2635	2767	2695	2720	2055	1826	2430	2649	2447
0-24	2692	2829	2741	2780	2151	1955	2476	2704	2518



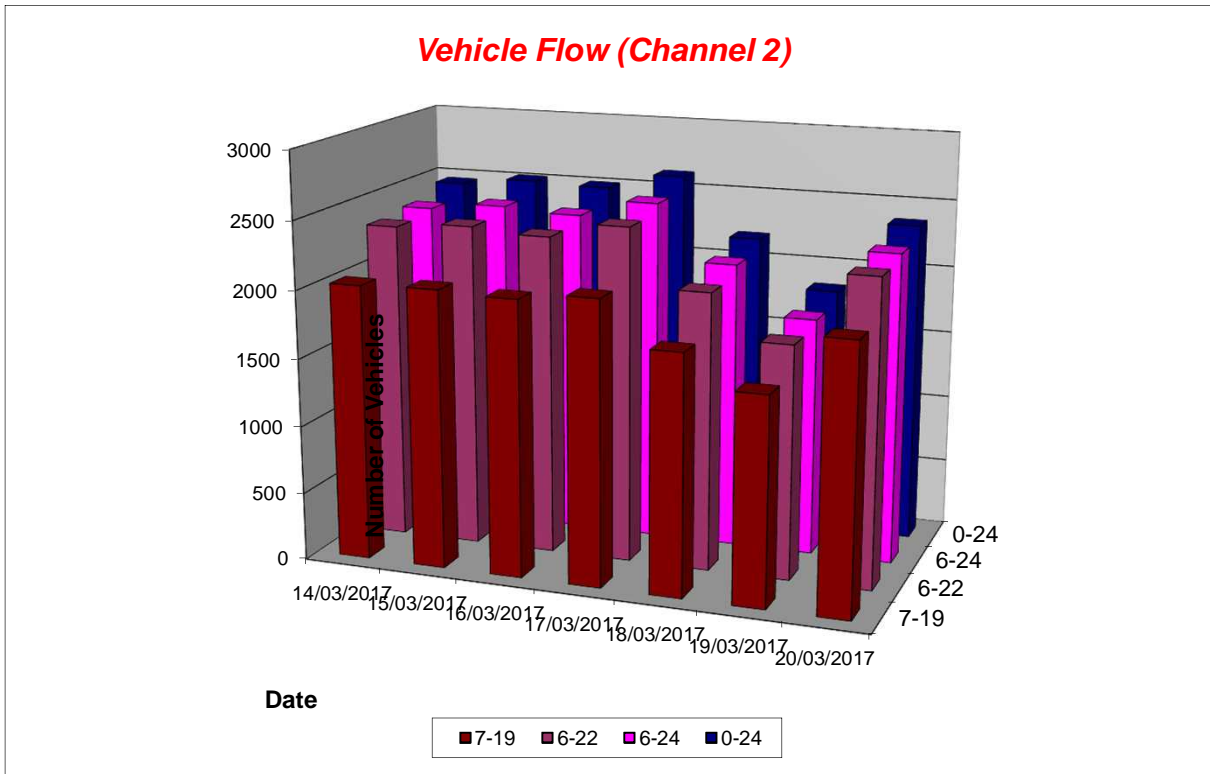
Lakenheath ATC 3, B1112 Southern Site (Week 1)

Channel 2 - Southbound

Vehicle Flow

Week 1

Hr Ending	14/03/2017 Tuesday	15/03/2017 Wednesday	16/03/2017 Thursday	17/03/2017 Friday	18/03/2017 Saturday	19/03/2017 Sunday	20/03/2017 Monday	5 Day Ave	7 Day Ave
1	9	11	9	12	12	14	4	9	10
2	3	3	8	6	23	11	5	5	8
3	6	5	3	1	8	15	5	4	6
4	2	6	7	4	4	10	3	4	5
5	17	17	27	21	8	8	22	21	17
6	53	50	51	55	20	20	46	51	42
7	129	125	130	128	66	31	133	129	106
8	250	242	235	225	83	48	243	239	189
9	273	223	234	212	127	78	245	237	199
10	164	182	173	164	183	139	135	164	163
11	141	146	134	153	226	183	159	147	163
12	143	131	160	170	179	168	138	148	156
13	120	142	137	162	156	200	133	139	150
14	126	135	130	129	163	159	113	127	136
15	129	143	136	156	152	138	125	138	140
16	156	167	143	173	122	116	144	157	146
17	184	208	225	174	119	106	187	196	172
18	181	180	173	167	140	92	172	175	158
19	163	148	147	195	108	94	154	161	144
20	85	110	100	120	99	93	91	101	100
21	46	57	49	69	58	55	44	53	54
22	51	43	42	63	57	18	27	45	43
23	15	29	29	35	45	28	27	27	30
24	16	14	19	27	30	11	11	17	18
7-19	2030	2047	2027	2080	1758	1521	1948	2026	1916
6-22	2341	2382	2348	2460	2038	1718	2243	2355	2219
6-24	2372	2425	2396	2522	2113	1757	2281	2399	2267
0-24	2462	2517	2501	2621	2188	1835	2366	2493	2356



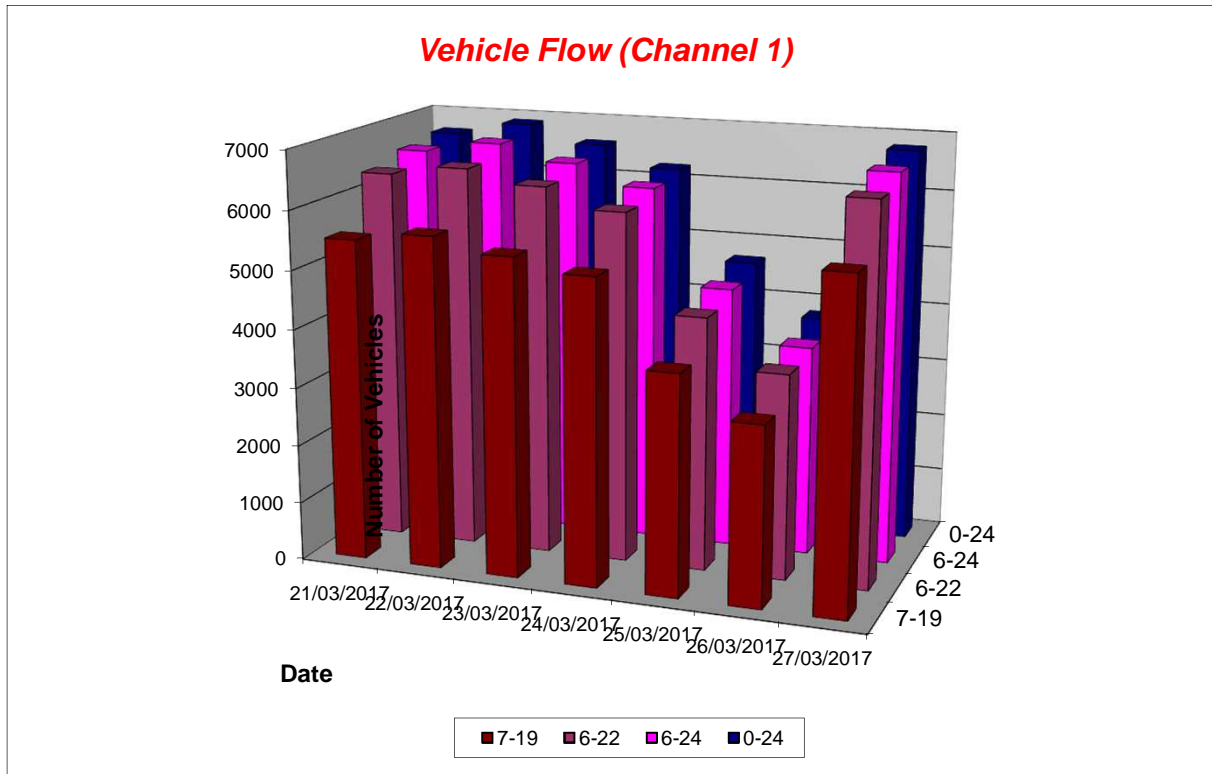
Lakenheath ATC 2, B1112 Northern Site (Week 2)

Channel 1 - Northbound

Vehicle Flow

Week 2

Hr Ending	21/03/2017 Tuesday	22/03/2017 Wednesday	23/03/2017 Thursday	24/03/2017 Friday	25/03/2017 Saturday	26/03/2017 Sunday	27/03/2017 Monday	5 Day Ave	7 Day Ave
1	27	34	17	13	79	78	33	25	40
2	11	16	14	14	40	0	18	15	16
3	10	10	9	4	11	28	7	8	11
4	8	4	7	4	16	28	9	6	11
5	23	17	29	24	14	21	26	24	22
6	36	62	30	39	10	13	42	42	33
7	253	237	265	250	29	26	230	247	184
8	547	558	566	556	78	52	550	555	415
9	389	341	360	341	132	88	387	364	291
10	391	446	362	361	185	116	390	390	322
11	338	320	275	318	291	261	327	316	304
12	393	347	378	308	335	307	328	351	342
13	378	411	443	377	423	369	417	405	403
14	385	440	367	383	407	380	398	395	394
15	440	491	437	459	401	322	411	448	423
16	442	486	423	412	335	307	487	450	413
17	581	591	609	525	419	304	582	578	516
18	747	723	730	732	415	312	838	754	642
19	467	501	471	433	341	246	465	467	418
20	286	287	285	207	233	193	317	276	258
21	168	197	182	179	197	139	186	182	178
22	160	158	162	140	116	92	150	154	140
23	114	135	108	101	103	56	117	115	105
24	69	78	61	60	65	45	79	69	65
7-19	5498	5655	5421	5205	3762	3064	5580	5472	4884
6-22	6365	6534	6315	5981	4337	3514	6463	6332	5644
6-24	6548	6747	6484	6142	4505	3615	6659	6516	5814
0-24	6663	6890	6590	6240	4675	3783	6794	6635	5948



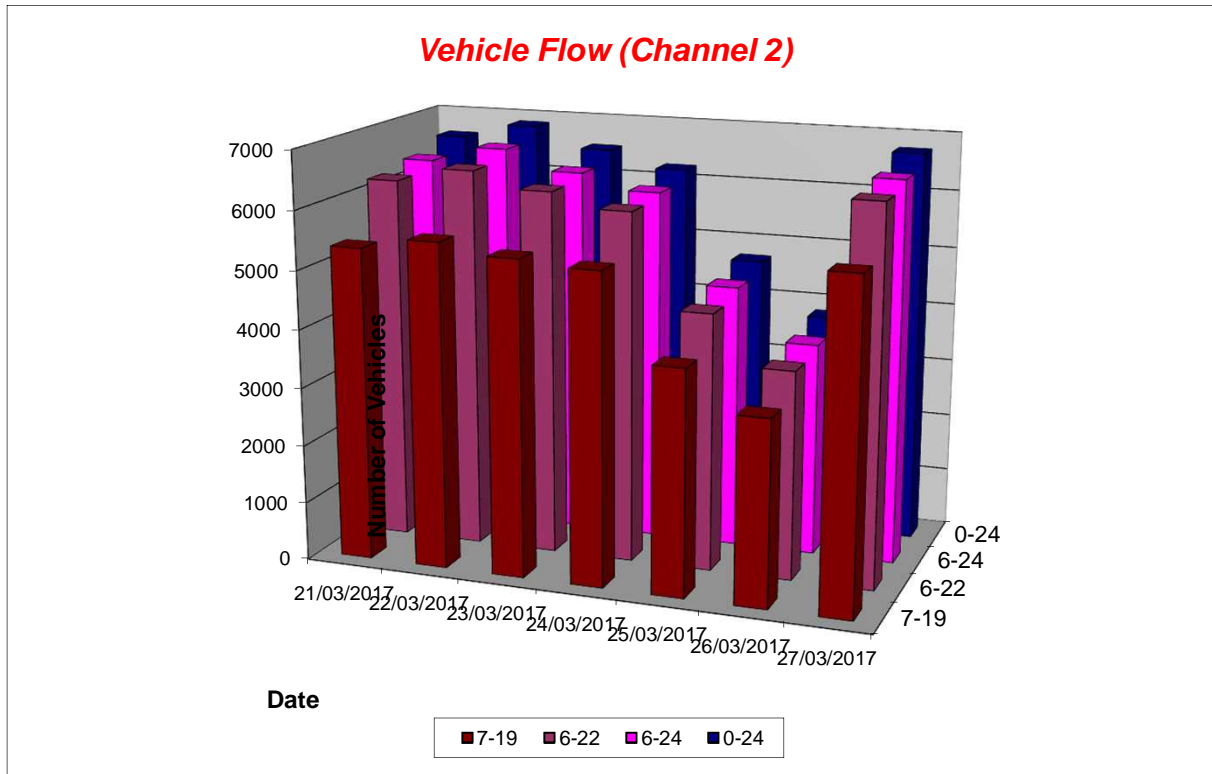
Lakenheath ATC 2, B1112 Northern Site (Week 2)

Channel 2 - Southbound

Vehicle Flow

Week 2

Hr Ending	21/03/2017 Tuesday	22/03/2017 Wednesday	23/03/2017 Thursday	24/03/2017 Friday	25/03/2017 Saturday	26/03/2017 Sunday	27/03/2017 Monday	5 Day Ave	7 Day Ave
1	18	21	13	4	43	35	24	16	23
2	15	14	9	5	25	0	7	10	11
3	8	4	5	6	12	24	11	7	10
4	5	9	6	9	19	15	15	9	11
5	37	29	46	45	29	16	28	37	33
6	137	127	106	92	34	43	124	117	95
7	337	325	353	303	102	58	315	327	256
8	523	594	570	560	129	85	571	564	433
9	651	596	688	623	221	133	599	631	502
10	382	416	389	376	321	253	432	399	367
11	350	361	338	349	413	334	339	347	355
12	394	401	416	353	379	377	416	396	391
13	392	457	381	419	398	384	419	414	407
14	359	379	343	333	334	345	389	361	355
15	381	417	365	393	348	357	385	388	378
16	462	541	478	494	304	243	505	496	432
17	613	527	509	528	349	239	509	537	468
18	515	454	508	479	352	194	632	518	448
19	342	417	404	395	298	224	375	387	351
20	264	256	244	194	199	183	268	245	230
21	185	202	139	124	125	105	156	161	148
22	100	158	110	71	132	57	115	111	106
23	95	98	56	51	78	67	73	75	74
24	37	56	31	24	56	27	40	38	39
7-19	5364	5560	5389	5302	3846	3168	5571	5437	4886
6-22	6250	6501	6235	5994	4404	3571	6425	6281	5626
6-24	6382	6655	6322	6069	4538	3665	6538	6393	5738
0-24	6602	6859	6507	6230	4700	3798	6747	6589	5920



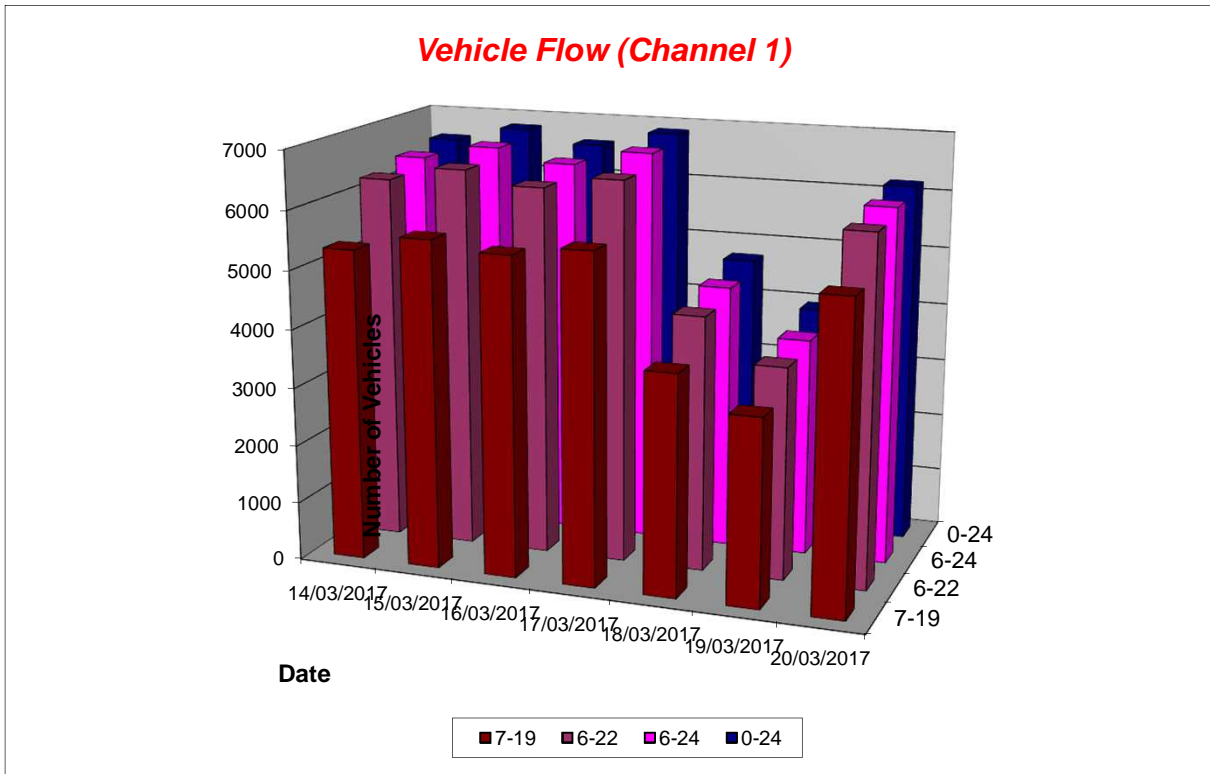
Lakenheath ATC 2, B1112 Northern Site (Week 1)

Channel 1 - Northbound

Vehicle Flow

Week 1

Hr Ending	14/03/2017 Tuesday	15/03/2017 Wednesday	16/03/2017 Thursday	17/03/2017 Friday	18/03/2017 Saturday	19/03/2017 Sunday	20/03/2017 Monday	5 Day Ave	7 Day Ave
1	29	23	28	30	80	70	17	25	40
2	12	15	15	10	39	31	10	12	19
3	12	5	9	9	20	33	7	8	14
4	8	9	10	8	12	24	3	8	11
5	20	24	18	22	17	25	23	21	21
6	35	46	38	46	12	14	45	42	34
7	245	249	264	239	35	28	243	248	186
8	575	551	545	566	81	42	557	559	417
9	333	343	363	354	133	78	309	340	273
10	357	397	381	401	204	117	370	381	318
11	272	314	324	320	293	272	307	307	300
12	344	356	393	346	361	324	337	355	352
13	425	417	361	416	393	394	340	392	392
14	375	387	383	431	424	373	417	399	399
15	425	410	440	477	409	342	444	439	421
16	438	482	434	514	345	340	423	458	425
17	570	611	564	593	393	328	538	575	514
18	770	807	780	721	396	329	745	765	650
19	450	528	480	477	328	247	433	474	420
20	280	315	269	292	240	195	221	275	259
21	219	170	167	207	192	136	153	183	178
22	191	177	150	154	130	86	106	156	142
23	102	103	100	136	101	60	88	106	99
24	61	62	72	90	77	51	53	68	67
7-19	5334	5603	5448	5616	3760	3186	5220	5444	4881
6-22	6269	6514	6298	6508	4357	3631	5943	6306	5646
6-24	6432	6679	6470	6734	4535	3742	6084	6480	5811
0-24	6548	6801	6588	6859	4715	3939	6189	6597	5948



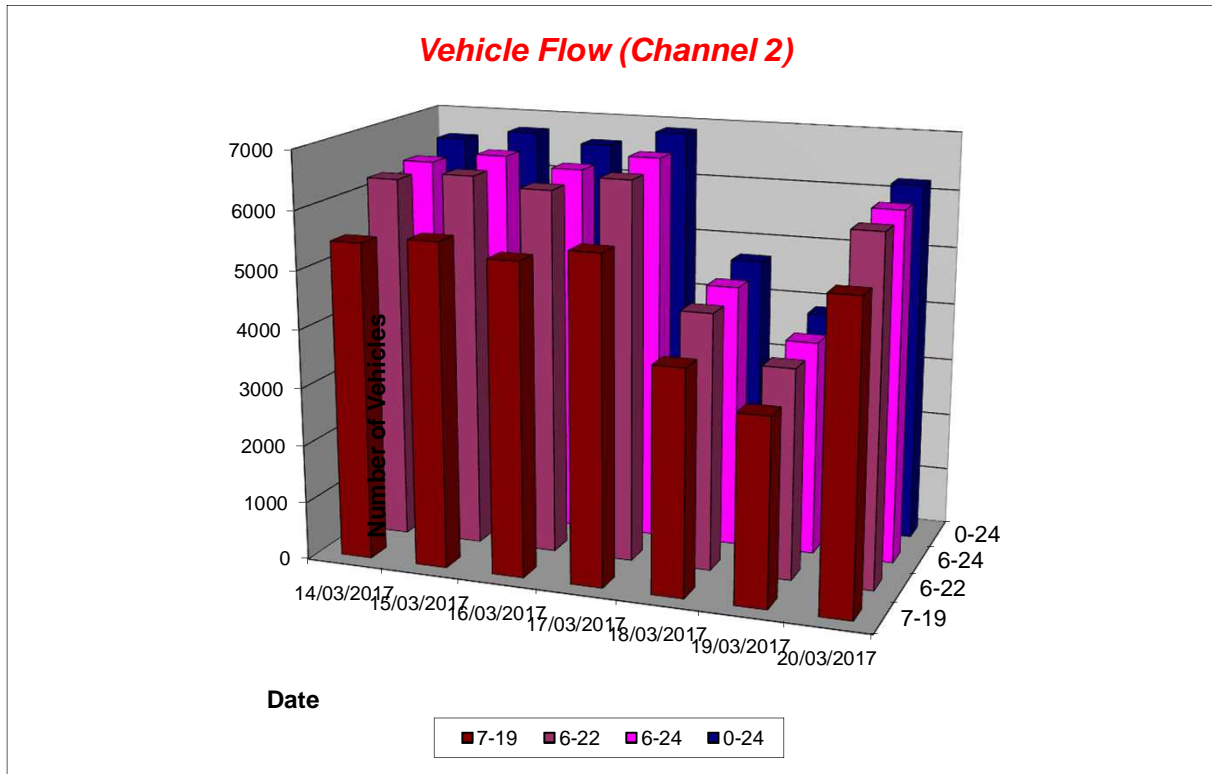
Lakenheath ATC 2, B1112 Northern Site (Week 1)

Channel 2 - Southbound

Vehicle Flow

Week 1

Hr Ending	14/03/2017 Tuesday	15/03/2017 Wednesday	16/03/2017 Thursday	17/03/2017 Friday	18/03/2017 Saturday	19/03/2017 Sunday	20/03/2017 Monday	5 Day Ave	7 Day Ave
1	14	24	19	19	37	36	10	17	23
2	7	9	16	11	29	20	7	10	14
3	9	13	8	8	12	25	6	9	12
4	11	15	10	10	15	19	7	11	12
5	46	33	39	36	24	12	36	38	32
6	116	111	123	134	38	40	103	117	95
7	329	315	362	333	95	48	292	326	253
8	576	586	549	534	142	82	559	561	433
9	645	636	611	594	219	133	620	621	494
10	387	399	390	415	327	255	337	386	359
11	367	355	346	390	412	355	368	365	370
12	403	416	417	423	401	360	351	402	396
13	372	385	403	417	394	389	411	398	396
14	350	384	348	390	351	335	334	361	356
15	386	381	367	446	349	342	372	390	378
16	504	518	456	553	323	259	481	502	442
17	528	534	599	532	315	236	542	547	469
18	500	599	510	487	338	232	472	514	448
19	432	377	355	403	281	228	384	390	351
20	263	268	252	252	209	188	203	248	234
21	122	163	186	173	129	111	141	157	146
22	109	97	106	171	126	61	82	113	107
23	51	81	77	86	82	60	57	70	71
24	30	41	43	56	50	29	35	41	41
7-19	5450	5570	5351	5584	3852	3206	5231	5437	4892
6-22	6273	6413	6257	6513	4411	3614	5949	6281	5633
6-24	6354	6535	6377	6655	4543	3703	6041	6392	5744
0-24	6557	6740	6592	6873	4698	3855	6210	6594	5932



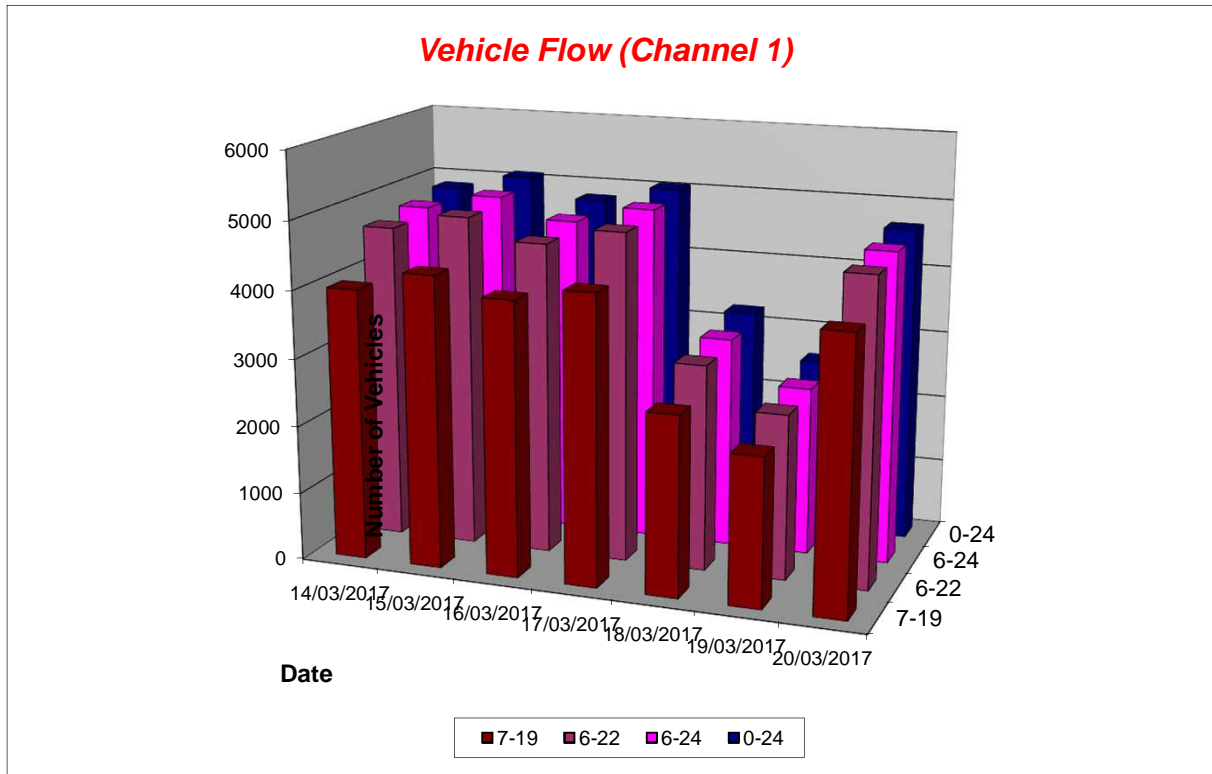
Lakenheath ATC 1, Eriswell Road (Week 1)

Channel 1 - Eastbound

Vehicle Flow

Week 1

Hr Ending	14/03/2017 Tuesday	15/03/2017 Wednesday	16/03/2017 Thursday	17/03/2017 Friday	18/03/2017 Saturday	19/03/2017 Sunday	20/03/2017 Monday	5 Day Ave	7 Day Ave
1	25	15	26	20	47	28	7	19	24
2	8	11	15	11	32	18	8	11	15
3	9	6	8	6	10	12	5	7	8
4	6	10	9	8	10	5	2	7	7
5	20	24	18	16	10	14	24	20	18
6	30	35	30	34	11	10	36	33	27
7	204	193	196	192	31	19	200	197	148
8	386	380	360	388	63	24	385	380	284
9	244	259	271	268	95	51	241	257	204
10	281	339	303	331	167	88	306	312	259
11	218	242	248	254	229	206	270	246	238
12	269	281	328	287	263	264	285	290	282
13	341	370	295	334	282	302	276	323	314
14	307	305	297	335	289	244	325	314	300
15	331	329	322	374	288	227	350	341	317
16	349	373	349	384	235	225	329	357	321
17	446	502	433	457	265	185	439	455	390
18	549	582	540	493	262	220	512	535	451
19	278	335	293	332	205	148	279	303	267
20	179	207	195	202	161	117	154	187	174
21	150	104	92	135	117	69	102	117	110
22	129	97	71	78	79	43	60	87	80
23	56	60	59	69	49	31	50	59	53
24	38	30	45	39	38	28	28	36	35
7-19	3999	4297	4039	4237	2643	2184	3997	4114	3628
6-22	4661	4898	4593	4844	3031	2432	4513	4702	4139
6-24	4755	4988	4697	4952	3118	2491	4591	4797	4227
0-24	4853	5089	4803	5047	3238	2578	4673	4893	4326



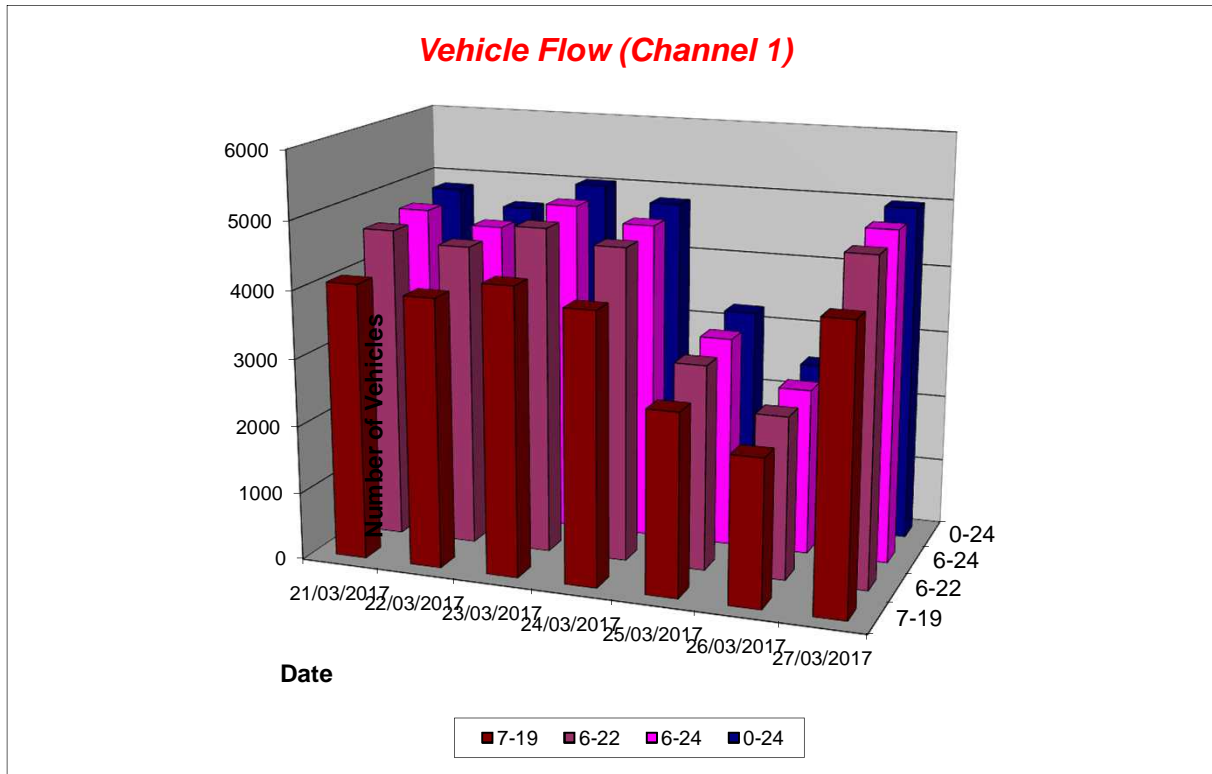
Lakenheath ATC 1, Eriswell Road (Week 2)

Channel 1 - Eastbound

Vehicle Flow

Week 2

Hr Ending	21/03/2017 Tuesday	22/03/2017 Wednesday	23/03/2017 Thursday	24/03/2017 Friday	25/03/2017 Saturday	26/03/2017 Sunday	27/03/2017 Monday	5 Day Ave	7 Day Ave
1	25	9	18	24	44	25	19	19	23
2	19	9	7	12	38	0	11	12	14
3	8	8	3	7	6	9	3	6	6
4	13	1	12	5	12	3	7	8	8
5	23	17	17	16	9	6	24	19	16
6	32	32	43	36	8	7	29	34	27
7	197	193	193	194	26	12	189	193	143
8	375	368	337	389	66	24	359	366	274
9	271	248	273	234	83	50	276	260	205
10	338	291	324	272	157	83	321	309	255
11	241	288	220	220	226	226	258	245	240
12	332	260	290	275	285	235	254	282	276
13	308	287	396	322	281	292	338	330	318
14	298	329	307	300	306	244	328	312	302
15	311	329	341	347	301	230	392	344	322
16	354	315	356	344	225	232	401	354	318
17	421	457	496	476	271	195	453	461	396
18	534	532	581	533	273	214	452	526	446
19	297	270	321	284	211	141	335	301	266
20	182	166	190	187	146	124	211	187	172
21	84	82	100	145	105	72	125	107	102
22	82	50	95	105	70	33	92	85	75
23	51	50	73	50	55	32	69	59	54
24	38	19	37	41	40	31	47	36	36
7-19	4080	3974	4242	3996	2685	2166	4167	4092	3616
6-22	4625	4465	4820	4627	3032	2407	4784	4664	4109
6-24	4714	4534	4930	4718	3127	2470	4900	4759	4199
0-24	4834	4610	5030	4818	3244	2520	4993	4857	4293



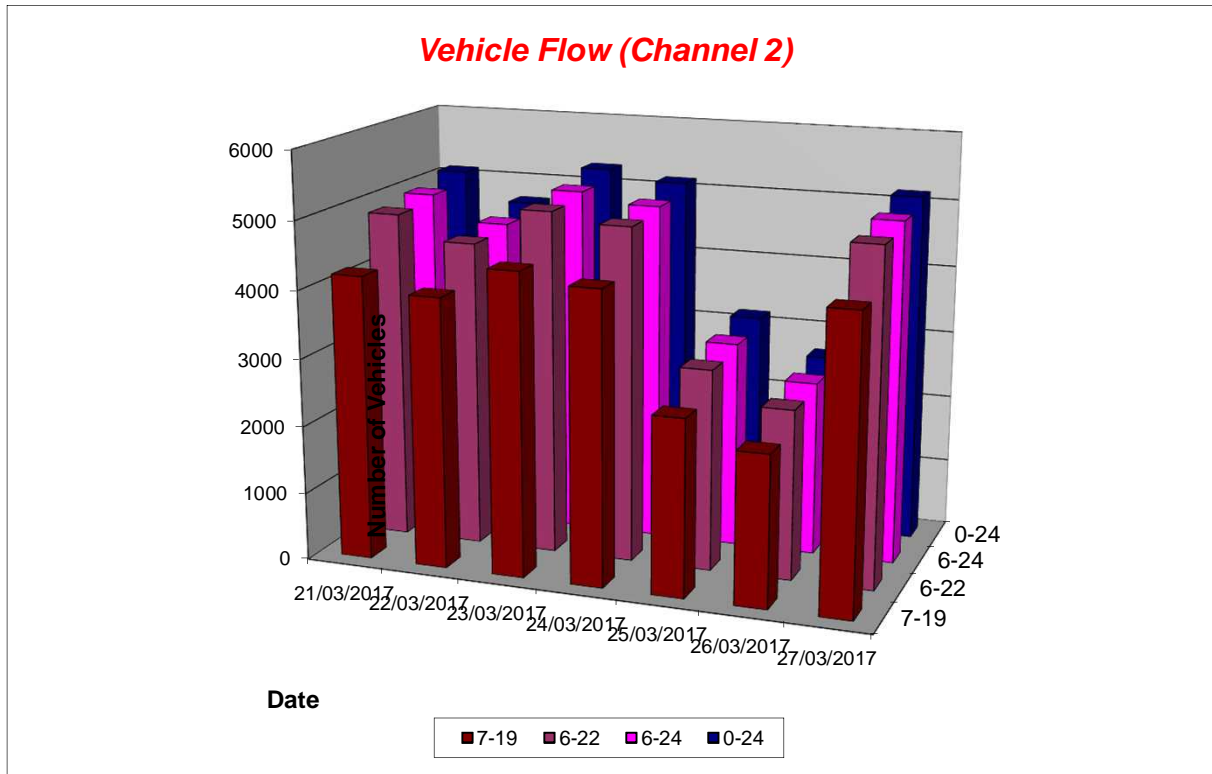
Lakenheath ATC 1, Eriswell Road (Week 2)

Channel 2 - Westbound

Vehicle Flow

Week 2

Hr Ending	21/03/2017 Tuesday	22/03/2017 Wednesday	23/03/2017 Thursday	24/03/2017 Friday	25/03/2017 Saturday	26/03/2017 Sunday	27/03/2017 Monday	5 Day Ave	7 Day Ave
1	18	13	13	16	32	24	15	15	19
2	16	6	7	2	18	0	5	7	8
3	3	1	6	5	7	14	8	5	6
4	6	6	13	10	14	10	10	9	10
5	25	14	28	35	23	6	12	23	20
6	89	71	72	73	22	22	80	77	61
7	255	201	235	222	41	30	221	227	172
8	402	417	424	422	64	38	403	414	310
9	513	438	473	466	107	65	433	465	356
10	294	246	311	272	181	155	325	290	255
11	238	248	262	253	271	224	277	256	253
12	288	281	327	308	280	264	292	299	291
13	322	303	326	344	282	250	306	320	305
14	270	271	314	293	249	245	330	296	282
15	290	313	321	305	249	278	387	323	306
16	392	384	405	416	209	202	450	409	351
17	452	419	421	459	248	173	422	435	371
18	446	382	512	437	224	159	384	432	363
19	286	280	351	321	232	166	282	304	274
20	198	142	186	225	130	128	170	184	168
21	137	118	120	100	96	74	120	119	109
22	78	69	73	81	103	52	121	84	82
23	69	38	50	48	54	45	61	53	52
24	21	29	32	28	29	23	42	30	29
7-19	4193	3982	4447	4296	2596	2219	4291	4242	3718
6-22	4861	4512	5061	4924	2966	2503	4923	4856	4250
6-24	4951	4579	5143	5000	3049	2571	5026	4940	4331
0-24	5108	4690	5282	5141	3165	2647	5156	5075	4456



Lakenheath ATC 1, Eriswell Road (Week 1)

Channel 2 - Westbound

Vehicle Flow

Week 1

Hr Ending	14/03/2017 Tuesday	15/03/2017 Wednesday	16/03/2017 Thursday	17/03/2017 Friday	18/03/2017 Saturday	19/03/2017 Sunday	20/03/2017 Monday	5 Day Ave	7 Day Ave
1	10	16	14	12	29	25	10	12	17
2	6	8	11	10	18	13	4	8	10
3	7	12	7	7	6	12	2	7	8
4	10	16	6	7	13	14	5	9	10
5	37	27	22	21	21	8	19	25	22
6	83	72	78	89	27	23	65	77	62
7	238	236	273	245	41	25	197	238	179
8	416	442	409	400	71	39	396	413	310
9	460	497	475	443	121	69	446	464	359
10	278	303	292	321	193	145	262	291	256
11	273	278	263	292	258	234	262	274	266
12	315	347	309	308	263	267	276	311	298
13	319	317	324	301	296	244	334	319	305
14	284	305	255	331	247	246	282	291	279
15	342	323	281	356	251	269	315	323	305
16	416	413	373	458	235	196	396	411	355
17	432	424	465	435	247	174	448	441	375
18	415	487	439	394	236	171	401	427	363
19	350	291	269	283	210	167	286	296	265
20	214	202	197	180	141	128	145	188	172
21	85	131	157	124	88	72	118	123	111
22	73	79	88	132	88	55	64	87	83
23	46	69	64	64	56	39	47	58	55
24	25	33	31	33	29	20	28	30	28
7-19	4300	4427	4154	4322	2628	2221	4104	4261	3737
6-22	4910	5075	4869	5003	2986	2501	4628	4897	4282
6-24	4981	5177	4964	5100	3071	2560	4703	4985	4365
0-24	5134	5328	5102	5246	3185	2655	4808	5124	4494

