

# Lakenheath Parish Council

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West Suffolk Council  
Strategic Planning Team  
West Suffolk House  
Western Way  
Bury St Edmunds  
Suffolk  
IP33 3YU

21<sup>st</sup> June 2019

Dear Sirs,

## **Single Issue Review and SALP Summary June 2019**

1. Lakenheath Parish Council wish to confirm that we are in favour of planned sustainable development for our village which is needed for it to grow and prosper. We understand that our response must be limited to the specific amendments, but delays have meant that what may have been extant and pertinent has changed fundamentally.
2. The merging of Forest Heath and St Edmundsbury is a relevant development in that the Cambridge need (a major premise in the original Forest Heath HMA work) If West Suffolk is taken as a whole then isochronic mapping of road and rail links on the A14 corridor clearly mitigate against developments in the more remote settlements of the District. The Forest Heath Objectively Assessed Housing Assessment produced for Cambridgeshire County Council (2016) indicates that 43% of the population will be from migration. Without employment, infrastructure or facilities it cannot be robust planning to put such a large proportion in Lakenheath.
3. Forest Heath originally discounted the Beck Row housing currently used by USAFE as there was no certainty around USAF intentions and protracted decontamination work would be required. However, since then the USAF have announced the closure of RAF Mildenhall in 2027, and indeed 1000 personnel have already redeployed to Gloucestershire. None of the accommodation 'outside the wire' in Beck Row and very little of that at the North end of the main site will require decontamination providing an instant housing stock in the West of the county.
4. Similarly - but inconsistently - Forest Heath District Council have included as already extant the Lord's Walk housing at RAF Lakenheath which has subsequently been made available to, and taken up in the main by, non-USAF families. As a Parish Council we struggle to understand why, if the issue is about housing provision, Forest Heath should interpret this as exclusively about new construction. In numerical terms these two sites alone will have generated at least a third of the total number of new homes required in the area by 2031.

5. We still confirm that the allocation – although slightly improved for Lakenheath by the proposed removal of site SA8(d) as a share of the total - is disproportionate. Our reasoning is the fact that the Local Planning authority are discounting:

- Environment including noise
- Employment
- Traffic management
- Lack of infrastructure
- Medical care
- Public transport

6. The 4 major planning applications included within the SALP (omitting that proposed to be removed as SA8(d)) were returned to the Development and Control Committee in September 2018 in the light of the material changes in circumstances in 2017. In particular, these changes were in relation to the ruling by the Court of Justice of the European Union which changed how decision makers must interpret and apply the specific provisions of the 'Habitats Regulations' (Case C323/17 - People over Wind, Peter Sweetman v Coillte Teoranta).

7. Lakenheath Parish Council is surprised that this was discussed at length within the Planning Officer's report for that meeting in September 2018 yet the detail has not been included within the current consultation material! At the time it was described as a 'most comprehensive and stand-alone Committee report specifically prepared in the light of the decision of the European Court of Justice'. In fact, the Planning Officer made the specific note that NO regard should be given to previous reports provided. Is Strategic Planning aware of the day to day activity of their operational Planning Officers?

8. In the Air Quality Management Report (2015 p26 item 4) FHDC states that there are no airports in the area. Logic and the 2018 NPPF draw no distinction between 'airports' and 'airfields' so the assessment is simply wrong.

9. The noise situation in Lakenheath has moved on from the previous deliberations by the Inquiry with more data and a greater depth of understanding to these very real issues which will effect Lakenheath. New evidence, including that submitted to the Local Plan examinations by email 7th March 2019, require noise safety issues in Lakenheath to be considered afresh. The data (actual rather than computer modelled) was submitted to the Development and Control Committee in September 2018, yet was dismissed in correspondence with Inspectors as only pertinent to the Judicial Review; it must be a key consideration in the development of the village.

10. The Planning Officer for the District Council has asserted that the noise disturbance will reduce with the introduction of the F35s when they arrive. This is untrue and somewhat bizarre, as i) there are now no immediate plans to remove the F15s and noise will increase simply because there will be more aircraft, each requiring at least the same flying time, and ii) the F35 is a much noisier aircraft. It should also be noted that all the submitted noise data (including modelling) was premised upon the use of east-west runways; when this reverses noise levels in the village increase very substantially. No data collection for west-east activity has been provided. The one common assertion of all the technical acoustics experts is that there is no way whatsoever of mitigating noise in external spaces, whether for the school or amenity areas for housing. This has been acknowledged by the Planning Officers for both the District and the County Councils. The District Council's response of 22nd March 2019 shows a lack of concern for accuracy.

They stated that the data we provided to you was published for the sole purpose of the Legal Appeal brought by Lakenheath Parish Council. On the contrary, the data was presented to and discussed at the Forest Heath Development and Control meeting September 2018 but (incorrectly) discounted by the Planning Authority. This represents a breakdown of communication or understanding between Strategic and other Planning Officers.

11. Employment is fundamental to the prosperity of Lakenheath. Since being designated a Key Service Centre (2010), Lakenheath has lost a large proportion of its already diminished employment opportunities with the closure of the Bank, Care Home, Garden Centre and others. In practical terms the only sources of employment in the village are a handful of smaller retail shops and one mini supermarket.

12. With good transport links, employment could be less of an issue. Traffic will become a huge problem particularly if the proposed traffic signalling project at Sparkes Farm Barn become a reality. Further, with the growth and intensification at RAF Lakenheath, this will be exacerbated through the village (November 2021) as personnel travel between Lakenheath, Mildenhall (USAF) and Feltwell (RAF). Public transport is very limited, and like the road the one bus service we have only travels north and south. The railway station some 3 miles from the village has no car park and trains only stop at weekends.

13. Within the proposed developments there is still no known proposal for additional medical facilities which will be required to service the current ageing community yet alone cater for the burgeoning of the population.

14. It is stated page 71 Of the HRA of Forest Heath SALP that a substantial buffer next to the Cut Off Channel, as shown on the Policies Map, providing semi-natural habitat adjacent to the water course should be provided where possible in relation to current or future applications". How can this now be brought about when with 3 of the current major cases where approval is now granted, the developers are paying towards the provision of a cycle route adjacent to the cut off channel. The Section106 agreements state for Eriswell Road "To use the Strategic Green Infrastructure Contribution to secure public access along the Cut-off Channel for recreational purposes and as part of the strategic mitigation for the settlement and also footpath provision and improvements to the south of the village (to the south of Undley Road). For Briscoe Way " to use the Strategic Green Infrastructure Contribution to secure public access along the Cut-off Channel by providing a bridge for recreational purposes and as part of the strategic mitigation for the settlement". For Rabbithill Covert "To use the Strategic Green Infrastructure Contribution to secure public access along the cut-off channel by providing a bridge for recreational purposes and as part of the strategic mitigation for the settlement."

Yours faithfully,

Lakenheath Parish Council