

Forest Heath District Council – Single Issue Review (SIR) and Site Allocations Local Plan (SALP) - Additional Matters

Response to Lord Derby's Representations on MM18 / RPS Technical Note dated 7 June 2018 - on behalf of the Newmarket Horsemen's Group (NHG) – 21 June 2018

Response to Sellwood Representation Section on MM18

1. The representation states: *'This [The RPS Technical Note] demonstrates that the A14 / A142 junction improvements and the Rayes Lane horse crossing improvement will mitigate concerns about traffic and the potential conflict between vehicles and horses.'* However, RPS has provided no evidence to confirm that the employment land traffic generation in addition to the 400 houses and school can be accommodated on the road network. There is no evidence of analysis having been undertaken.
2. The third bullet under Delivery of Hatchfield Farm (HF) – states that the A14 / A142 improvements are supported by Highways England. That was the case in 2015 but there is no evidence to show that the 20,000 sqm of employment land has been included in revised analysis and approved by Highways England.
3. The sixth bullet – states: *'whilst the current planning application does not include the development of 5 ha of employment land, it should be noted that the proposed northern access to the housing and its junction with the A142 have the capacity to accommodate the employment development.'* There is no evidence of this analysis having been undertaken. Furthermore, this statement cannot be right because Aecom have confirmed that the WSP scheme for HF exceeds capacity (B18 paragraph 8.2.9); and that conclusion was reached by Forest Heath District Council's (FHDC) consultant prior to the employment land being added to the HF scheme. The only logical conclusion is that the HF junction proposals will exceed capacity to a greater extent than Aecom have identified and the agreement Lord Derby reached with Highways England and Suffolk County Council (SCC) should be revisited. Aecom's flow diagrams at Appendix E Cumulative Impact Addendum March 2018 for the northern HF access show only residential trips therefore no account has been taken of the proposed HF employment traffic at the access points. It is considered that the analysis has not been undertaken, there is no evidence to support it and the proposals are therefore considered to be unsound.
4. The detailed evidence that the work is flawed can be found by examining the HF access points from Aecom's flow diagrams at Appendix E Cumulative Impact Addendum March 2018 Scenario 3 Figure 5 where only residential traffic flows have been included. This is confirmed from the

figures Aecom have allocated to those junctions i.e. 44 vehicle arrivals and 164 vehicle departures during the AM peak. This tallies with the trip rates 0.11 per unit arrivals ($0.11 \times 400 = 44$) and 0.41 per unit departures ($0.41 \times 400 = 164$) referred to at paragraph 5.2.1 of the August 2016 Aecom report (B18). Therefore no account has been taken of the employment and school uses at the points of access either by Aecom or RPS for Lord Derby. This means there is no evidence that these additional traffic flows can be accommodated on the road network. The work has simply not been undertaken. **Plan 1531/11 demonstrating that only residential traffic has been included in the Aecom / RPS work is attached.**

5. Aecom say they have included some allowance for employment use in their growth factors but there are no flows other than residential figures shown on their plans at the site access points – Cumulative Impact Addendum March 2018 Appendix E Figure 5; and as confirmed on **plan 1531/11** attached. The Trip Rate Information and Computer System (TRICS) database (used to determine traffic generation from development) indicates traffic flows for 20,000 sqm (based on 5 hectares and a plot ratio of 0.4 as set out in Aecom's Cumulative Impact Addendum March 2018 Appendix D) of employment floor space proposed at HF in the AM peak hour of 0.947 per 100 sqm or 190 vehicle movements. Whilst there may be some internal trips within the development it would be expected that the vast majority would be external trips from the A14 to the north or from Fordham Rd to the south.
6. Approaching the likely traffic generation for the employment use from first principles based on Aecom's 676 staff employed at HF (Aecom's Cumulative Impact Addendum March 2018 Appendix D) indicates that over 400 staff would drive to work based on 2011 Census data for Newmarket, which shows around 60% of the population drive to work (**plan 1531/4A attached**). This suggests that the TRICS figure of 190 vehicle movements in the AM peak hour could be substantially higher **with over 400 of the people at the employment site on HF driving to work.**
7. 400 residential units would generate around 208 movements in the AM peak. Even assuming traffic from the employment use at the lower end of the range (190 movements) would approximately double the traffic associated with HF on Fordham Road (passing through the A14 junction and on Fordham Road to the south) i.e. around 400 movements in the AM peak compared to that shown on the Aecom plans at the access points of 208 movements.
8. Furthermore, as regards the school, in Mr Plumb's 2015 evidence to the HF Inquiry Appendix C he referred to 80 additional vehicle movements at the southern access in the peak hours. There is no allowance for this in the Aecom modelling or Lord Derby's modelling.
9. **In summary, the traffic impacts of the new 2018 proposals by Lord Derby for HF to include large employment areas and a school in addition to the previous 400 houses has not been**

modelled by either RPS or Aecom in their submissions. This is a major flaw in their work and the reason why SCC cannot reasonably draw their conclusions and why the current submissions cannot be relied upon to provide a sound basis for decisions on the SIR / SALP. There is insufficient evidence to determine whether there is a severe impact arising from the SIR / SALP traffic increases, which would inevitably involve additional queuing and delays on top of those occurring at the present time; with the attendant added impedance to emergency vehicles (including those associated with the HRI) and buses on Fordham Road, Bury Road and High Street.

10. In COTTEE Transport Planning's (CTP) representations to the September / October 2017 hearings concerns were raised as regards the A14 junction and impact on Fordham Road. These concerns remain and are reinforced by the latest addition of 20,000sqm of employment development at HF.

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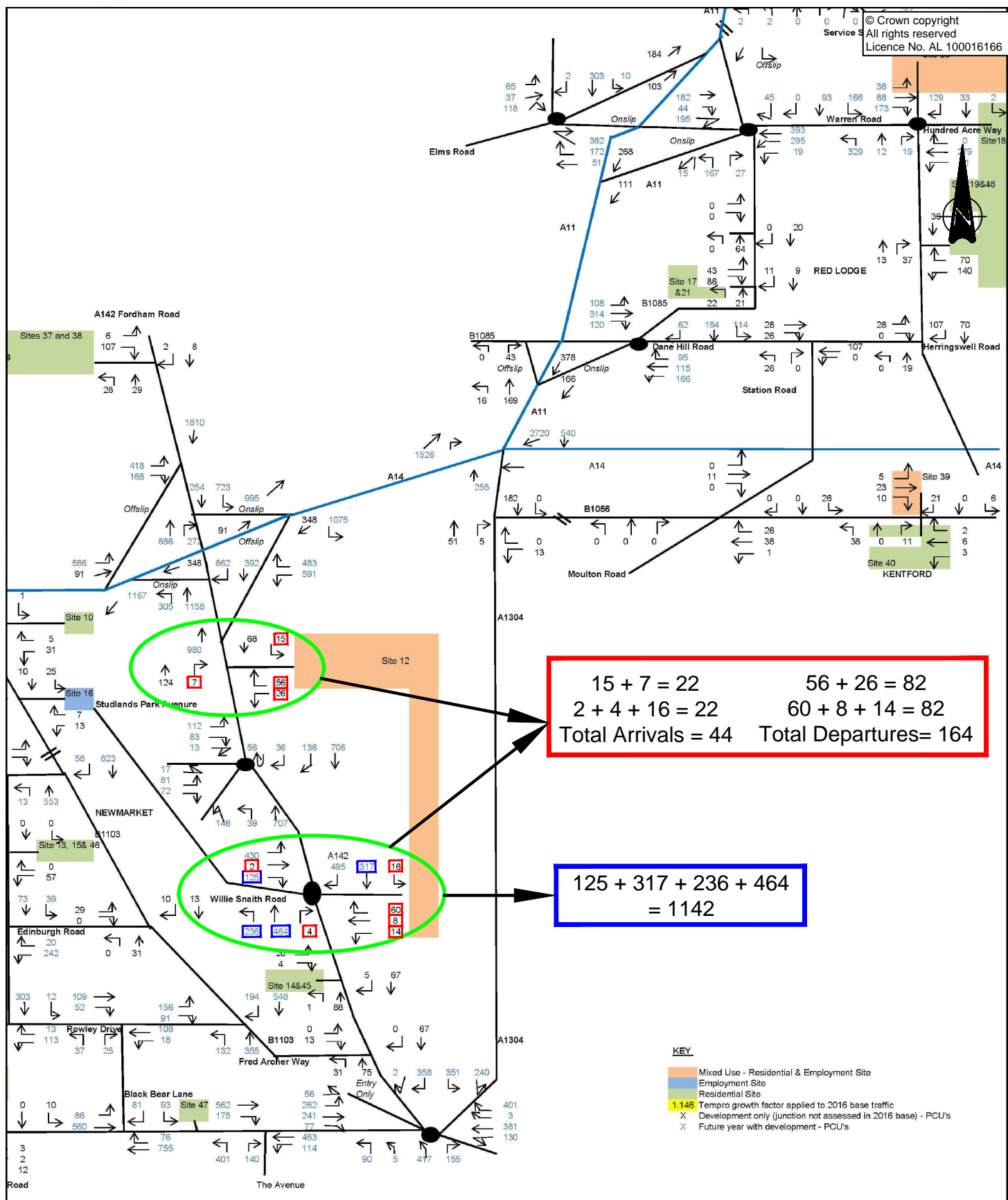
1. **Paragraph 4** – Policy Framework to allow each specific development to address impacts on horse movements. However, there are few developments that could contribute and there is a large funding gap of around £900k.
2. **Paragraphs 11 and 53** – RPS's Table 1 has been calculated from Aecom's Cumulative Impact Addendum March 2018 document Appendix E. Aecom's work was based on 'high level' predicted flows from the Willie Snaith Rd (Tesco) roundabout 1.5km north of Rayes Lane (representations were made in this regard to the SIR / SALP hearings in September 2017). These flows were not measured at Rayes Lane itself. Despite RPS's Table 1 stating Rayes Lane as a column heading the flows are in fact predicted flows from 1.5km north on Fordham Road at the 'Tesco' roundabout and are not from Rayes Lane at all. There are many other junctions and access points over that 1.5km section between the 'Tesco' roundabout and Rayes Lane where traffic flows to and from those junctions therefore using flows at a junction 1.5km away as a proxy is flawed.
3. The **1142** figure from RPS's Table 1, which they calculated from Aecom's Cumulative Impact Addendum March 2018 document Appendix E Figure 5 is again based on 'high level' predicted flows from the 'Tesco' roundabout 1.5 km north of Rayes Lane. The flows are not from Rayes Lane at all despite RPS's Table 1 heading stating Rayes Lane. This approach is also flawed. **Plan 1531/11 attached shows how RPS have calculated the 1142 figure from Aecom's diagram. It can be seen that this does not include residential traffic from HF and there is no clear evidence of employment / school traffic being included either.**
4. RPS's assertions at Paragraph 53 that CTP have analysed the crossing for flows 6% higher than those contained in the Aecom report **are incorrect because RPS flows are wrong for the**

reasons stated above. This is confirmed from Aecom's Horse Crossing Assessment Report dated 20 June 2018 Table 1 where they state flows at Rayes Lane of 1283 associated with the SALP (not the 1142 in RPS's Table 1 nor the 1208 analysed by CTP in 2015 for the Inquiry).

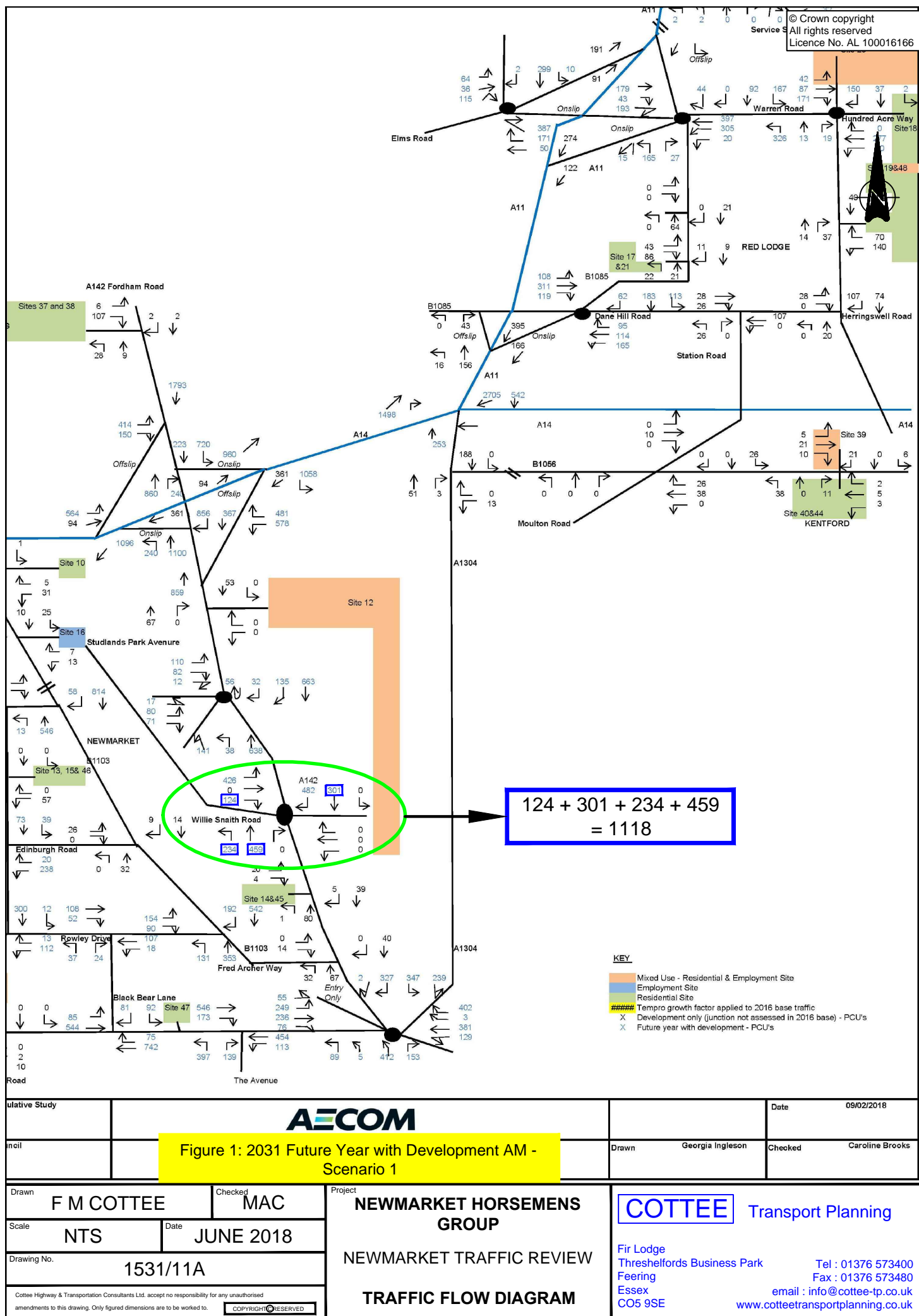
5. The only logical conclusion is that the latest 2018 Lord Derby scheme at HF should be properly modelled to include the employment site, school, latest SALP proposals and proposed horse crossings interaction with existing junctions. As stated previously a Microsimulation model should be undertaken to provide a proper assessment.
6. RPS's claim that the difference in the figures of their Table 1 is the HF impact i.e. $1142 - 1118 = 24$ (2.8% increase due to HF). RPS rely heavily on the 2.8% figure quoted throughout their statement at Table 1, and at Paragraphs 12, 15, 66 and 68; and they base their conclusions on the 2.8% figure. **However, this figure is incorrect because neither RPS nor Aecom have allowed for appropriate levels of employment and school traffic; and furthermore the figure of 24 excludes the residential traffic at that access point as shown on plan 1531/11 attached.**
7. The 1142 and 1118 figures in RPS's Table 1 are simply Aecom's traffic predictions for the southern arm of the 'Tesco' roundabout **but exclude HF residential traffic. RPS's figure of 24 vehicles at Rayes Lane is therefore incorrect and should be disregarded.** Plan 1531/11A attached shows how RPS have derived the 1118 figure from the Aecom diagrams, a figure for flows 1.5km north of Rayes Lane not at Rayes Lane itself. The agreed figure for traffic at the Rayes Lane crossing of 48 vehicles from 400 houses at the 2015 Inquiry will increase as a result of the employment and school uses on the site. RPS's other figures in Table 1 relating to changes in traffic from Aecom data at two other horse crossings should also be reviewed.
8. **Paragraphs 16 and 18** – The RPS statements cannot be right because Aecom have confirmed that the WSP scheme for HF exceeds capacity (B18 Paragraph 8.2.9); and that conclusion was reached by FHDC's consultant prior to the employment land being added to the HF scheme. The only reasonable conclusion is that the HF junction proposals will exceed capacity to a greater extent than before and the agreement Lord Derby reached with Highways England and SCC should be revisited. Aecom's flow diagrams for the northern HF access show only residential trips therefore no account has been taken of the proposed HF employment traffic at the access points. It is therefore considered that the analysis has not been undertaken, there is no evidence to support the current proposals, and the previous analysis / agreements are therefore unsound.
9. **Paragraph 31** – There is no evidence to support this position from FHDC / SCC / RPS because traffic from the SALP / HF employment land has not been analysed properly with the proposed crossings in place. The work undertaken by NHG / SCC has been undertaken as a response to

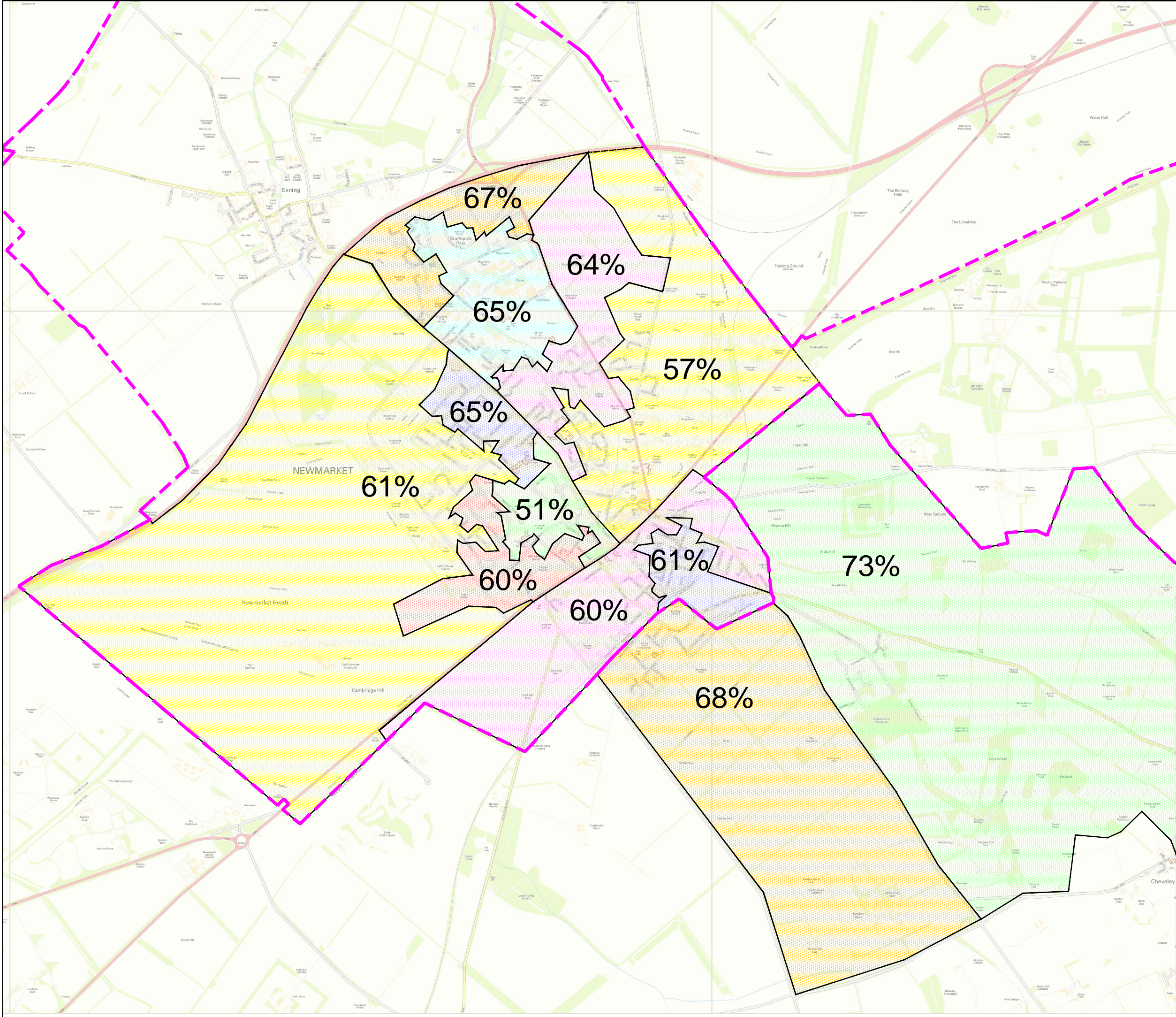
existing traffic issues but no analysis has been undertaken with SALP growth / HF employment land.

- 10. Paragraph 36** - The issue is not only about recorded accidents it is about the risk of injury to high value thoroughbred racehorses (and therefore threat to the HRI) as a result of increased traffic. Since Fordham Road over its entire length is the focus for all HF traffic because the two access points take access directly from it, a route that is considered by FHDC's consultant as 'highly likely to experience accidents' and 'accidents are more likely to result in death or serious injury' casts serious doubt over the appropriateness of adding more traffic to this route be it from HF or anywhere else. The addition traffic from a large employment area comprising 20,000 sqm, in addition to 400 houses, on Fordham Road will exacerbate the problems already identified.
- 11. Paragraph 48** – RPS is incorrect in their assertions, since the horse crossing designs have been undertaken as a response to existing traffic conditions and have not allowed for traffic growth associated with the SALP and the proposed 2018 changes in the HF scheme to include large areas of employment.
- 12. Paragraphs 52, 54 and 56** – The CTP analysis and Professor Warran's assessments for the 2015 Inquiry were applicable to the situation under consideration at the 2015 Inquiry. Circumstances have changed significantly since then with 30% SALP traffic increases and employment land proposals at HF. These changes need to be modelled to assess the interaction of the proposed crossings and increased traffic.



ulative Study		AECOM		Date	09/02/2018
ncil		Figure 5: 2031 Future Year with Development AM - Scenario 3		Drawn	Georgia Ingleson
				Checked	Caroline Brooks
Drawn	F M COTTEE	Checked	MAC	Project	NEWMARKET HORSEMENS GROUP
Scale	NTS	Date	JUNE 2018		NEWMARKET TRAFFIC REVIEW
Drawing No.	1531/11				TRAFFIC FLOW DIAGRAM
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METHOD OF TRAVEL TO WORK :

Newmarket (Parish) 2011 Census Data

Total Population (employed)	9,412	
Car Driver	5,723	61%
Walk	1,633	17%
Car Passenger	550	6%
Cycle	560	6%
Work from home	421	4%
Bus / Coach	254	3%
Train	106	1%
Other	165	1%

DISTANCE TRAVEL TO WORK (2001) :

Newmarket (Parish) 2001 Census Data

Total Population (employed)	7,968	
Less than 5 km (Newmarket)	46%	
10 - 20 km (Ely, Cambridge, Bury St Edmunds)	23%	
20+ km (Norwich, Chelmsford, Peterborough London)	18%	
Work at home	8%	
Other	5%	

Key:
Driving a Car / Van to work (%)

DRAFT

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Client
JCE / NHG

Project
NEWMARKET

Title
NEWMARKET TOWN
ZONE MAP (2011 Census Data)

Drawn A FIRMIN	Checked MAC
Scale NTS	Date AUGUST 2015

Drawing No.
1531/04A

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