

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

Response to Suffolk County Council's (SCC) Representations dated 8 & 20 June 2018 - on behalf of the Newmarket Horsemen's Group (NHG) – 21 June 2018

Response to SCC letter dated 8 June 2018

1. **SCC's SIR letter dated 8 June 2018** confirms that Aecom have been instructed by SCC to consider the effect on network performance of introducing signalised horse crossings. SCC say that Aecom's work is **only preliminary and high level and only considers Rayes Lane**. SCC originally stated that Aecom's assessment was only provided on 4 June so had not yet been reviewed by SCC and they were not in a position to endorse it. However, SCC subsequently provided a further updated statement by Aecom with amendments on 20 June 2018. A response is provided on the latest Aecom report dated 20 June later in this submission.
2. SCC state: *'As identified in the April 2018 AECOM Technical Note (page 25), the predicted traffic impact on horse crossings arising from the Local Plan is not considered to be severe. As such, whilst options exist for improvements to be delivered to the benefit of the local racing industry, there is not evidence to show that mitigation will be required at all 17 crossings in order to deliver the Local Plan.'* **However, since neither SCC nor Aecom have undertaken appropriate analysis there is insufficient evidence to draw such a conclusion.**
3. SCC have confirmed that their consideration of the needs of racehorses and their riders in Newmarket is based on a standardised approach that they would adopt in any other location for any other road user. Aecom have adopted a similarly standardised approach to risk assessment based on 'Guidelines for the Environmental Assessment of Road Traffic (1993)' paragraph 9.0 of the Aecom Technical Note – April 2018. **However, this standardised approach is considered wholly inappropriate to the particular circumstances in Newmarket where 3000 racehorses are stabled and with most out training and crossing roads every day to access the gallops. The conditions in Newmarket are not 'standard'.**
4. The particular needs of the Horse Racing Industry (HRI) require a different **non-standardised** approach to the consideration of risk assessment involving equine experts. SCC say there is no evidence to show mitigation is required at all 17 crossings to deliver the Local Plan but there has been no modelling of the interaction of the crossings (that are

acknowledged to be required at Rayes Lane / Bury Road / St Mary's Square) with existing junctions and with the Local Plan site traffic included. Therefore it is concluded that SCC have no reasonable grounds upon which to draw their conclusion. In their latest submissions Aecom claim at their paragraph 4.6 that: *'This [acceptable impact] would also be true at other locations within the town where signalisation is proposed.'* **However, Aecom have not examined the other crossing locations nor have they examined properly the interaction of those crossings with adjacent junctions. Their conclusions are not underpinned by appropriate evidence and are therefore unsound. The appropriate approach would be to prepare a Microsimulation model to examine queuing, delay and journey times through the network and compare these with existing conditions to determine whether there would be a severe impact. Severe impact would involve residual impacts such as additional queuing / delays on top of those occurring at the present time, and impedance to emergency vehicles (including those associated with the HRI) and public transport for example.**

5. SCC add that: *'at present collision records do not indicate a significant pre-existing safety issue.'* This is another example of SCC's standardised approach. However, as stated previously 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. Taking Rayes Lane as an example - since Fordham Road over its entire length is the focus for high levels of traffic at present and will be subject to all Hatchfield Farm (HF) traffic if approved, 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 30% plus more traffic to this route as a result of the Local Plan proposals.

6. SCC SALP letter dated 8 June 2018 - MM18 states:

'Proposed site SA6(g) appears deliverable, given the transport evidence set out in AECOM studies and the consideration which was given to previous applications at this site. Transport mitigation will be required, as set out in the policy, and the County Council does not have reason to believe that this cannot be delivered.'

It is not reasonable for SCC to draw these conclusions because the work has not been undertaken to model HF properly. Furthermore, the work undertaken by RPS for Lord Derby, and Aecom for FHDC is flawed for the reasons set out in the following paragraphs.

7. 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). **These figures are shown on plan 1531/11 attached and demonstrate that 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.

8. 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. Their work is not clear in this regard. 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 and from Fordham Road to the south.
9. 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 at HF driving to work.**
10. 400 residential units at HF 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.
11. 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.
12. 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.**

13. 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 added to a one third increase in traffic on key Newmarket roads.

Response to Aecom's Horse Crossing Assessment dated 20 June 2018:

1. Aecom say at paragraph 1.1 that they: *have been commissioned by SCC to assess whether the proposal to signalise a number of existing horse crossings within Newmarket will have an impact on the operation of the local road network as a result of traffic from the Forest Health District Council (FHDC) Local Plan growth. This work has been undertaken as a result of a query raised by Cottee Transport Planning, the transport consultants for the Horse Racing Industry.* **In fact Aecom have only undertaken a basic manual assessment at one crossing (Rayes Lane) and seek to extrapolate their conclusions to other locations within the town (paragraph 4.6).**
2. Aecom state at paragraph 2.1 that: *'SCC confirmed that they have not undertaken any detailed work on the operation of the proposed horse crossings within Newmarket.'* This confirms COTTEE Transport Planning's (CTP) knowledge of the work that has been undertaken for NHG in consultation with SCC over the past 18 months. The work has been a response to existing conditions not future SIR / SALP conditions, with two Pegasus crossings to be implemented later this year and others identified to be implemented if funds are available.
3. In their work Aecom use 2012 data and consider Rayes Lane only. Aecom use a 2-way flow of 1283 for Rayes Lane in 2031 which is **12% higher than the figures referred to in the Lord Derby submissions of 1142 with HF, which have been identified as being flawed. The Aecom figure confirms the flawed nature of Lord Derby's claims as regards traffic flows at Rayes Lane.**
4. **There are a number of flaws in Aecom's assessment as detailed in the paragraphs below.**

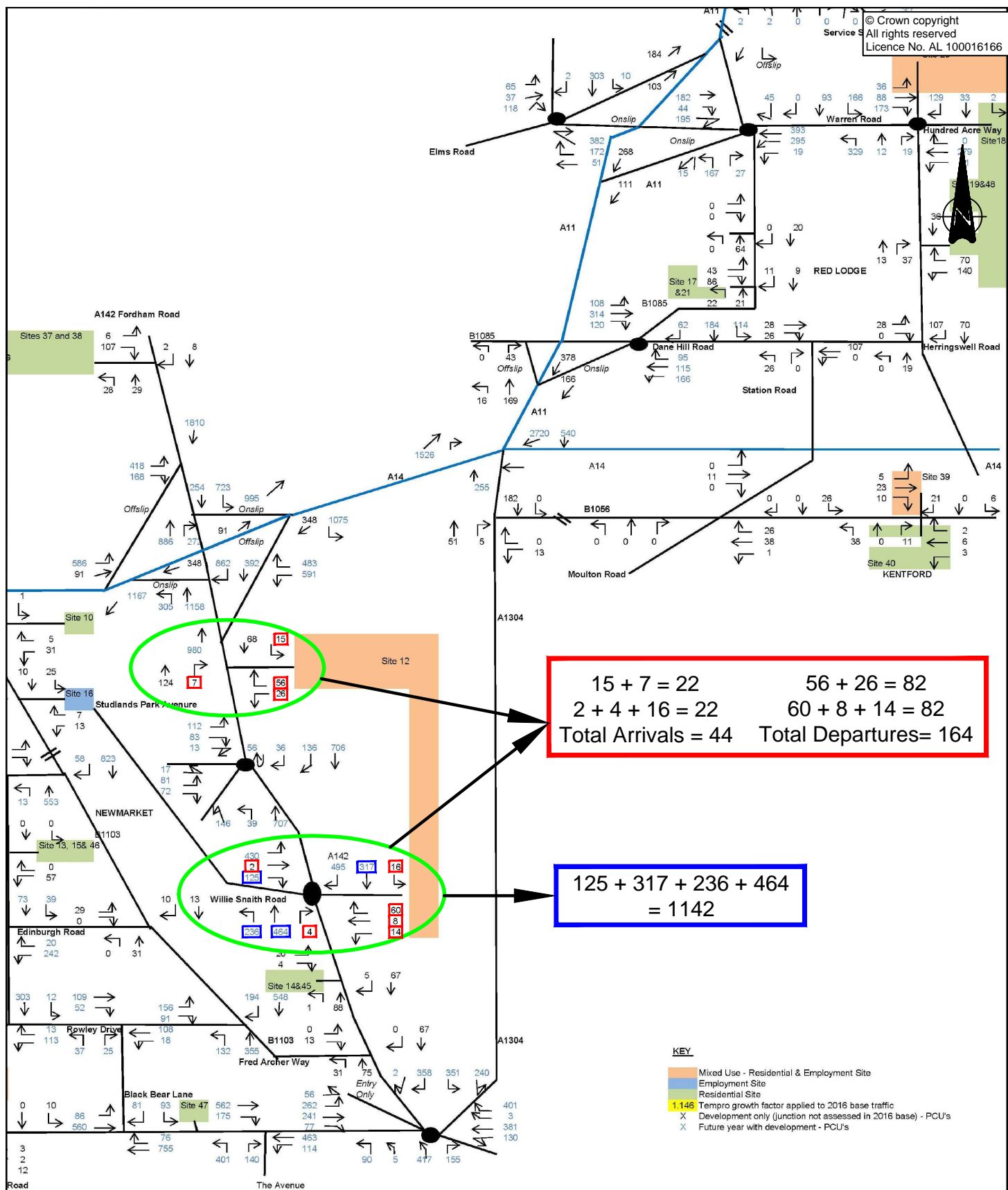
5. The 2012 data used by Aecom only includes queue lengths southbound and states at Appendix A that northbound queues **'cannot be observed'**. The omission of actual northbound queue measurements means that their manual assessment cannot be calibrated properly. This is a flaw in their assessment.
6. In Aecom's Table 2 it is noted that they have altered the southbound traffic queue length figures from 10 on four occasions to 10+ in the latest document. It is not clear whether the queue beyond 10 vehicles could be seen from SCC's video surveys they refer to. It must be concluded that the absence of northbound queue data and uncertainties in the southbound data renders **Aecom base data not fit for purpose**; and this is confirmed by the results of May 2018 data referred to below.
7. NHG instructed CTP to undertake queue length surveys in early May this year 2018 (**see attached plans 1531/9 and 1531/10 for Rayes Lane and Bury Road respectively**). The surveys showed there to be significantly longer queues than Aecom's 2012 surveys (Aecom's work showed southbound queues of between zero and 10+ vehicles or around 0m to 60m+). The May 2018 surveys showed queues varying between 20m and 400m southbound and 20m to 90m northbound (Aecom provide no data for northbound queues).
8. In 2015 NHG instructed JCT Consultants to model a Pegasus crossing at Rayes Lane. The full JCT report is attached at Appendix MC9 of the CTP evidence to the 2015 Inquiry. However, this work was based on circumstances in 2015, which have changed significantly with: the SALP allocations; the new 2018 HF scheme expanded to include 20,000 sqm of employment development; and the proposed Pegasus crossings in Newmarket. Aecom have undertaken no equivalent appropriate assessment to that provided by NHG at the 2015 Inquiry; and as stated in submissions the significant changes in circumstances now warrant Microsimulation modelling to examine the interaction of junctions and crossings. **The basic Aecom 'high level' manual calculations based on 2012 data, which has been shown to be out of date by reference to the latest May 2018 queue length comparison data, does not provide a sound basis upon which to draw important conclusions on the SIR / SALP, nor does it provide any basis upon which to verify the latest proposals at HF.**
9. **The changes in circumstances referred to above have been acknowledged by the Secretary of State in his letter dated 19 June 2018 which states at point 4:**

'.....the Secretary of State notes that over 3 years have now passed since the inquiry was held in April 2015. He considers that there have been significant changes in circumstances since the inquiry which are material to the redetermination of the proposal, including the publication for consultation of the Single Issues Review and Site Allocations Local Plan Main Modifications on 25 April 2018. A large volume of updated technical material has also been received from parties since the inquiry on complex issues. The Secretary of State

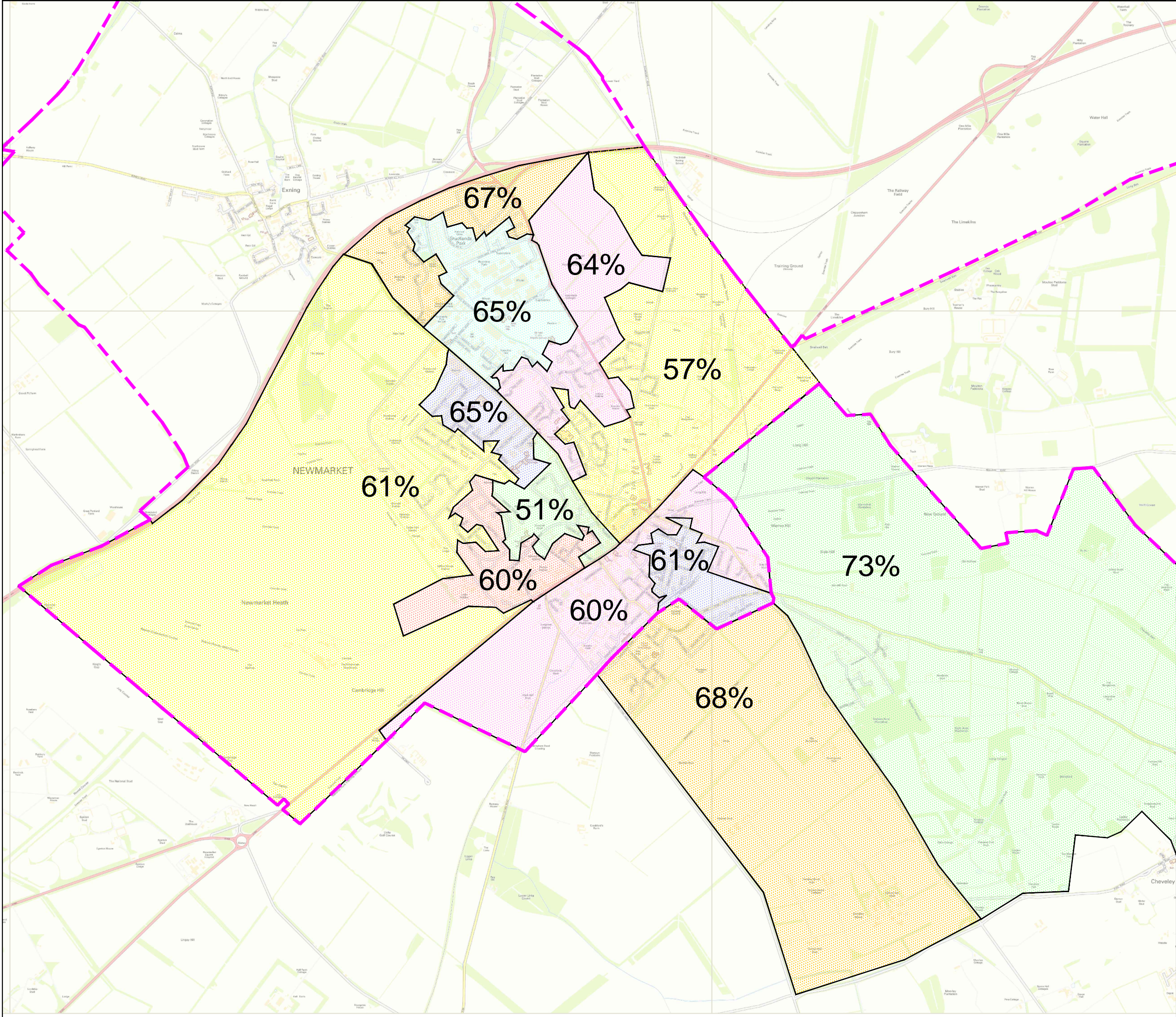
considers that re-opening the inquiry would give all parties an opportunity to thoroughly test this updated evidence, including by cross-examination if necessary.'

10. Aecom's 'high level' manual calculation for a Pegasus crossing indicates queues of 95m northbound and 108m southbound. This has changed from their earlier 1 June version which stated 123m northbound and 80m southbound. However, the comprehensive analysis undertaken for the 2015 Inquiry indicated queues with a crossing in place of up to 140m northbound and 270m southbound (based on lower traffic figures than used by Aecom). A 140m queue could start to interfere with the operation of the adjacent signal junction. Furthermore, the 2015 Inquiry figures from JCT's analysis did not include the latest SALP / HF proposals therefore adding the extra traffic from that would increase the queue lengths with the likelihood for blocking back to other junctions; and increasing queuing and delay to greater levels than at present. This outcome would thereby restrict the movement of all traffic and in particular the ability of all emergency vehicles, HRI key personnel (emergency doctors / vets; trainers and owners), and public transport to move around Newmarket. **The conclusion is that the Aecom high level manual calculation work cannot be relied upon and the evidence has not been provided to meet the soundness test. The extent of additional queuing and delay needs to be properly assessed and compared to existing using appropriate modelling such as Microsimulation. It can then be determined whether the residual impacts are severe in the context of NPPF.**

11. Aecom have not examined the impact of a Pegasus Crossing on Bury Road. The existing 2018 queue length surveys are attached on **plan 1531/10**. Adding 33% more traffic to Bury Road as predicted in Aecom's assessments and a Pegasus crossing should be examined using Microsimulation modelling to determine the interaction of the crossing and the adjacent Clocktower Roundabout / the Fordham Road. Aecom simply dismiss this location as being the same as Rayes Lane with no attempt to model the effects. It can be seen from the 2018 queue length surveys that queues already extend to in excess of 150m. Adding a third more traffic to Bury Road and a Pegasus Crossing is considered very likely to increase queuing and delay with the potential of blocking back to the already constrained Clocktower roundabout, which in turn would impact on Fordham Road and the High Street. No work has been undertaken by AECOM in this regard therefore the addition of 33% traffic to Bury Road has not been properly assessed and the SIR/ SALP is not therefore underpinned by the necessary evidence.



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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			COTTEE Transport Planning Fir Lodge Threshelfords Business Park Feering Essex CO5 9SE Tel : 01376 573400 Fax : 01376 573480 email : info@cottee-tp.co.uk www.cotteetransportplanning.co.uk		



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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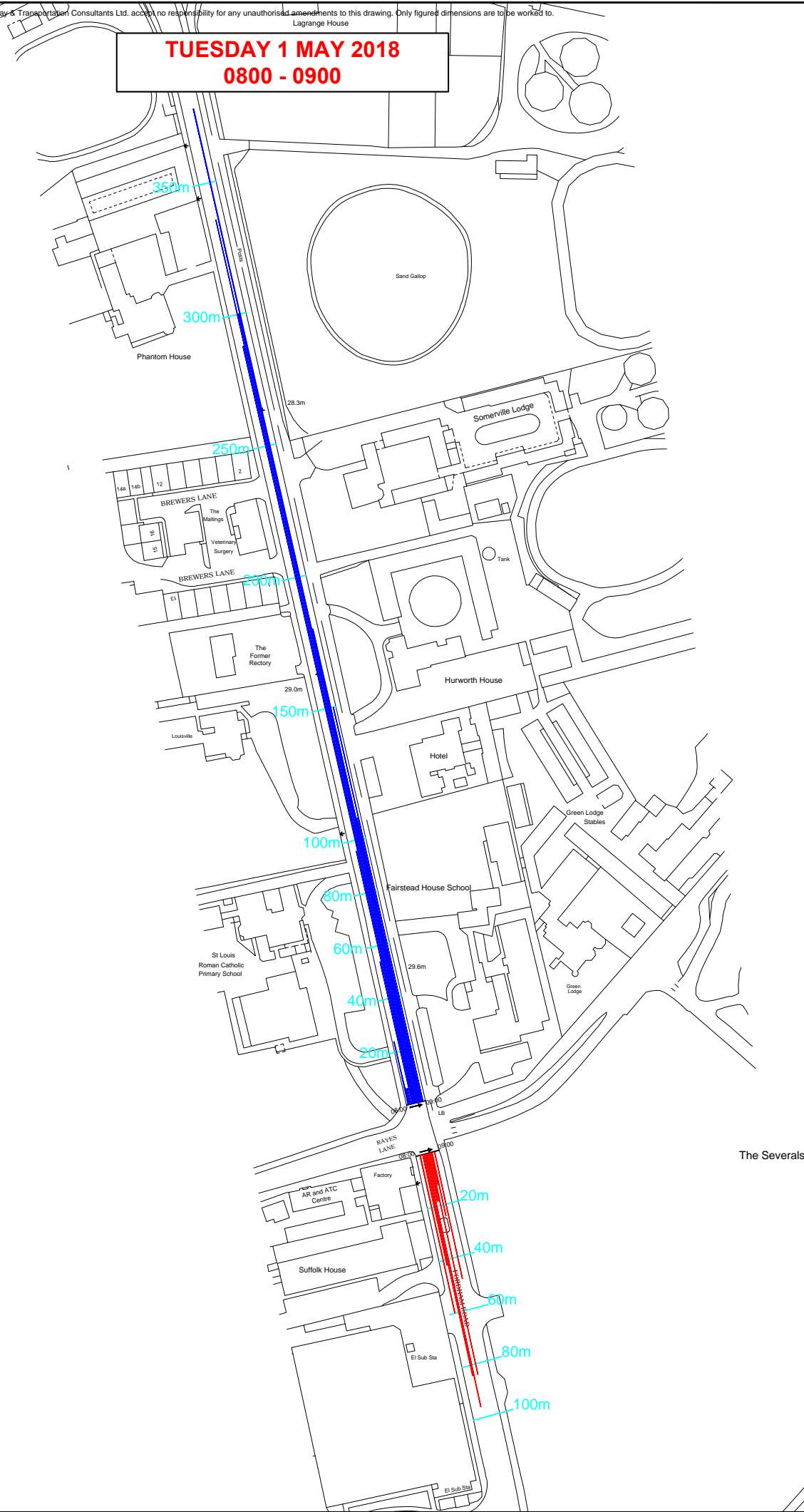
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JCE / NHG

Project
NEWMARKET

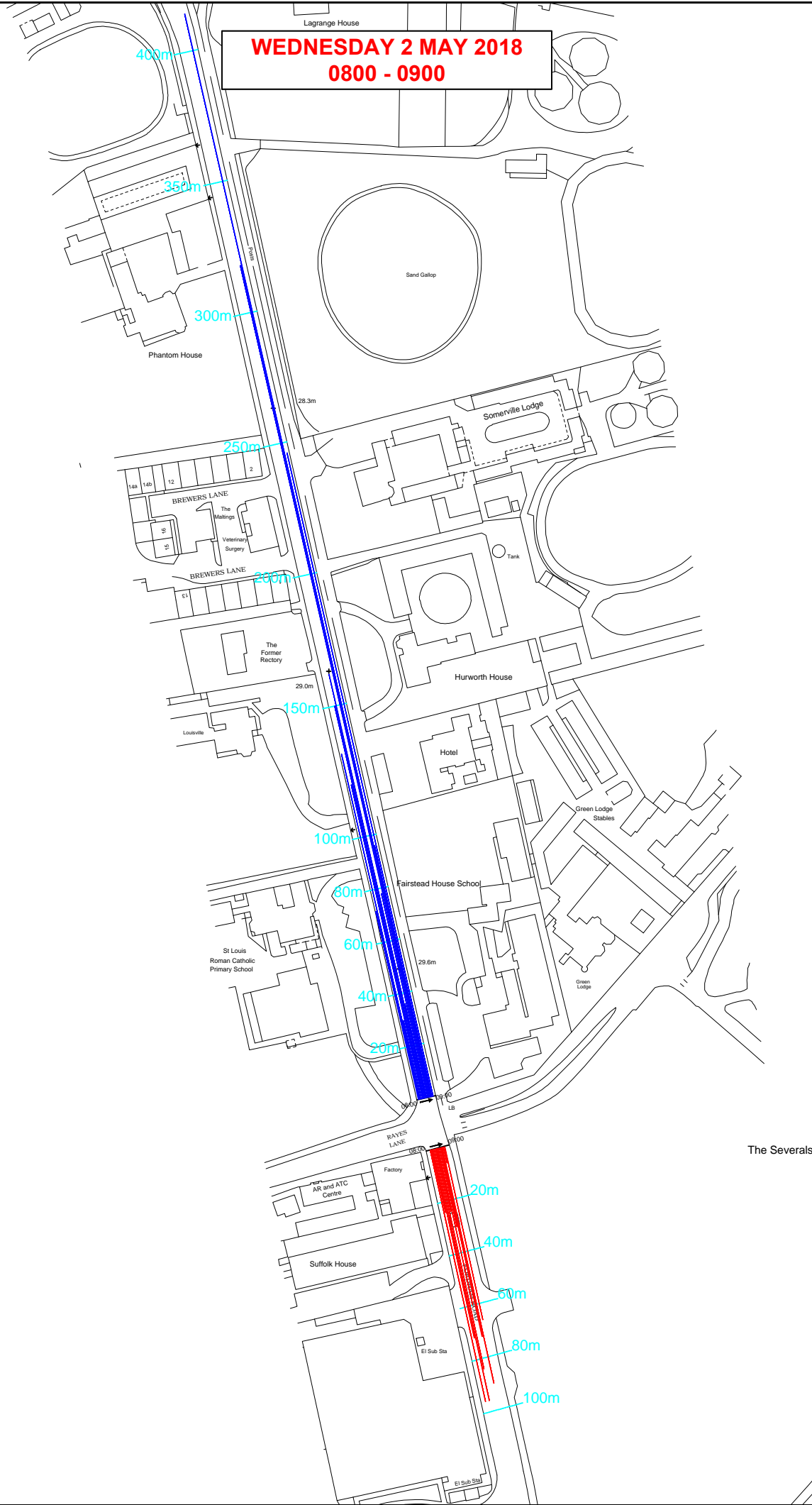
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NEWMARKET TOWN
ZONE MAP (2011 Census Data)

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Scale	NTS	Date	AUGUST 2015
Drawing No.	1531/04A		

TUESDAY 1 MAY 2018
0800 - 0900



WEDNESDAY 2 MAY 2018
0800 - 0900



KEY:

Each line details the maximum queue length observed during each 5 minute period.

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Project
NEWMARKET

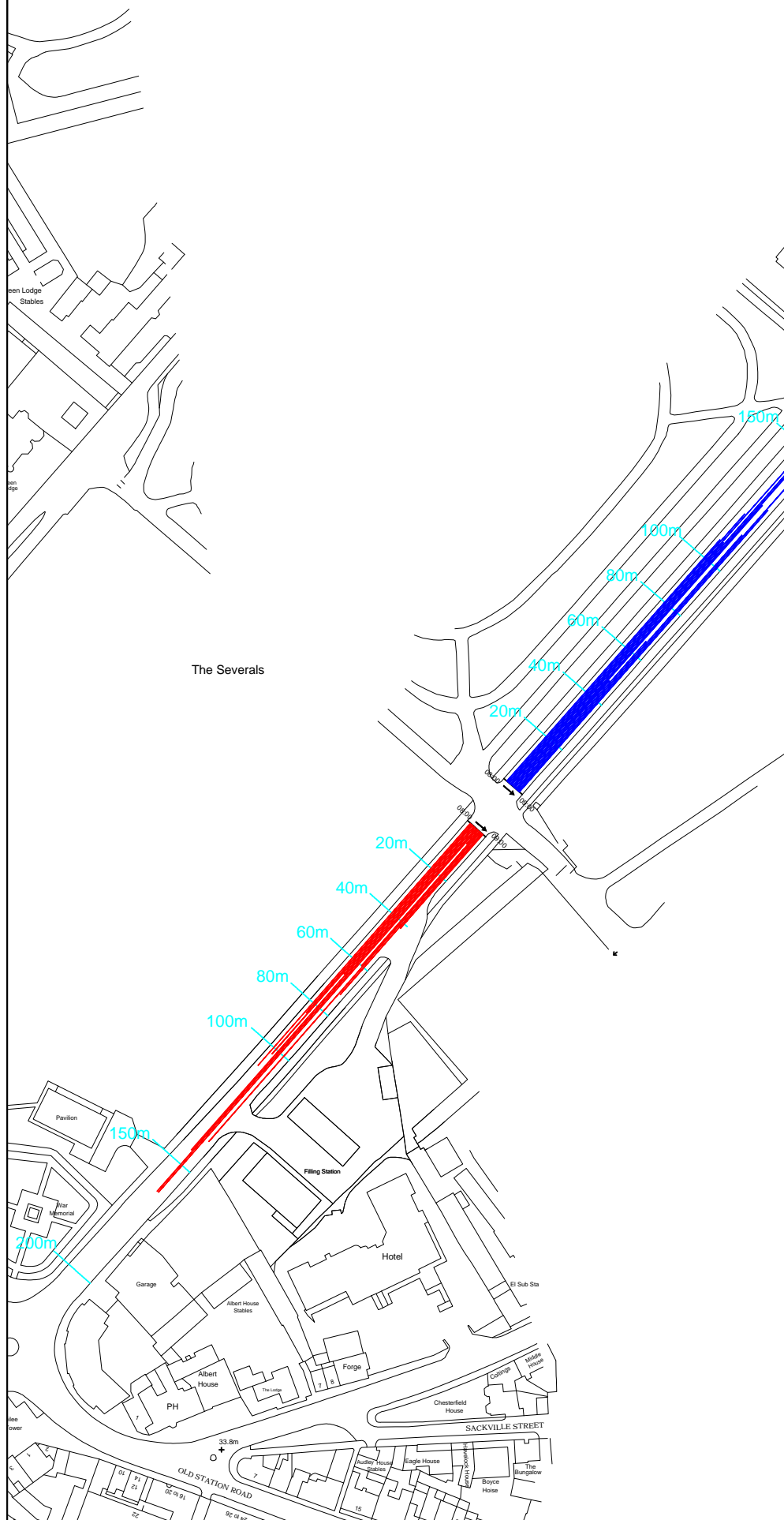
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QUEUE LENGTH RAYES LANE
TUESDAY 1 MAY & WEDNESDAY 2 MAY 2018
0800 - 0900

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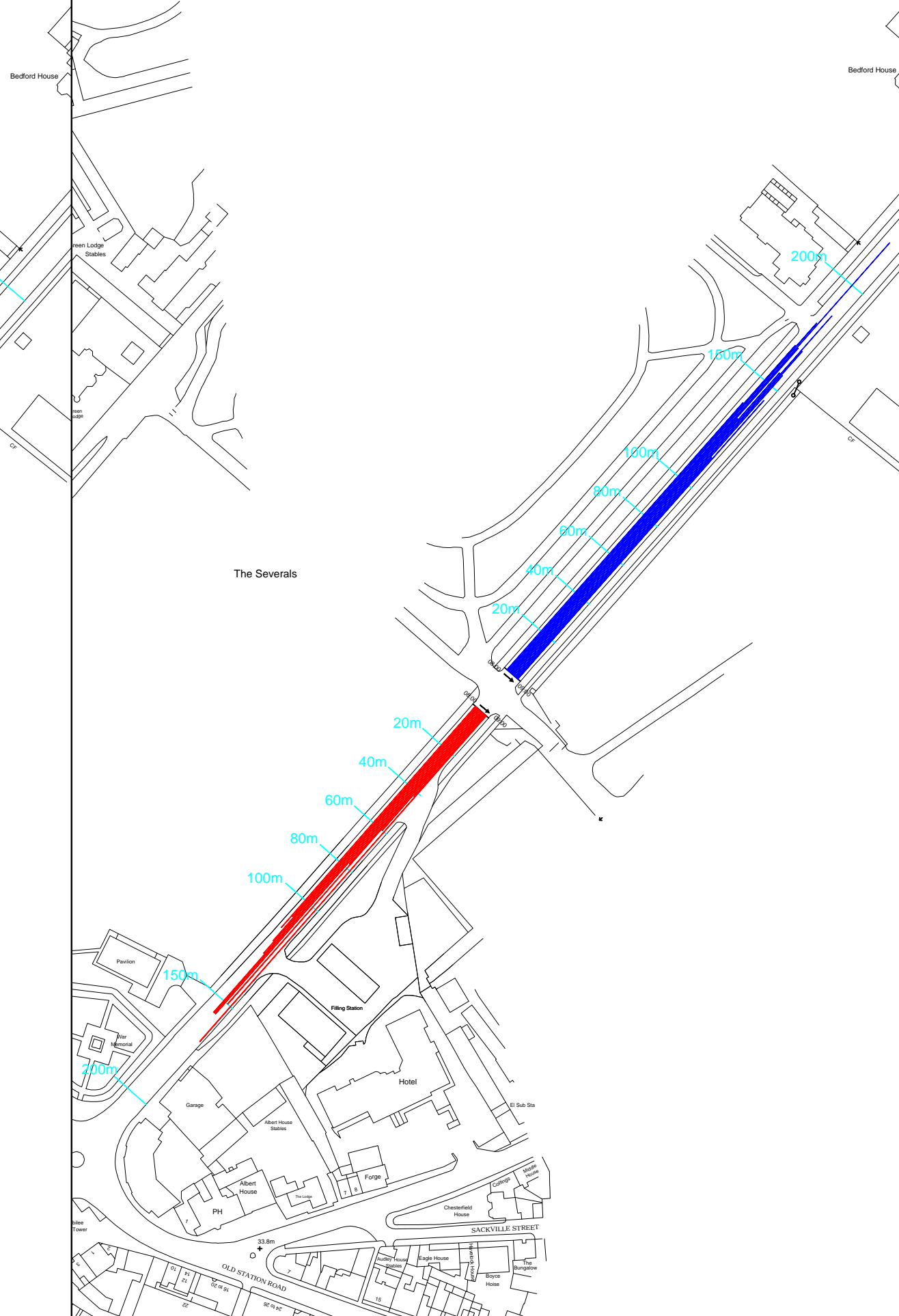
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MAY 2018

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1531/09

TUESDAY 1 MAY 2018
0800 - 0900



WEDNESDAY 2 MAY 2018
0800 - 0900



KEY:

Each line details the maximum queue length observed during each 5 minute period.

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Client

**THE JOCKEY CLUB ESTATES
LIMITED**

Project **NEWMARKET**

Title **QUEUE LENGTH BURY ROAD**
TUESDAY 1 MAY & WEDNESDAY 2 MAY 2018
0800 - 0900

Drawn	A FIRMIN	Checked	MAC
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Scale	1:2000 @ A3	Date	MAY 2018
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