

WORKING PAPER 2

Appeal under section 78 of the Town and Country Planning Act 1990

Land adjacent to 34 Broom Road, Lakenheath, Suffolk
APP/H3510/W/16/3149242

Lakenheath Parish Council Rule 6 Party Statement of Case

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27 July 2016

1. Summary of position

Lakenheath Parish Council has been granted Rule 6 status in connection with this appeal. As set out in the letter requesting Rule 6 status, the Parish Council is seeking agreement with the developer on transport matters set out below.

At the time of submission of this statement of case these discussions are on-going. At present, subject to agreement with the developer on transport matters, the Parish Council does not intend to offer evidence on the matters other than in relation to transport impacts, and it may be that prior to the appeal hearing these matters are satisfactorily resolved. Despite the limited nature of the Parish Council's involvement in this appeal due to limited funding there are important issues that need to be addressed during the inquiry and the Parish Council provides brief comment on these points below.

2. History of Parish Council consultations

The Parish Council's formal consultation responses are appended to this statement as Appendix 1 (initial consultation 3/12/14) and Appendix 2 (re-consultation 25/11/15). The Parish Council originally opposed the application on the basis that 147 units would be too dense and therefore inappropriate growth for the village context. On the basis of the revised scheme for 120 units, the Parish Council gave qualified support for the application when the matter was before Forest Heath District Council.

3. Housing growth in Lakenheath

The Parish Council has consistently advocated for a low scale of growth in the parish due to important constraints. The District Council has consistently ignored these concerns and advocated for maximum housing growth in the parish and has formally proposed housing land allocations through the Local Plan process in the region of 800 houses, although curiously declined to allocate not the appeal site

The key constraints affecting housing growth in Lakenheath include: (1) the proximity to US Air Force (USAF) military jet operations at RAF Lakenheath and the planned acquisition by the USAF of new F-35 squadrons; (2) the lack of community facilities necessary to properly characterise Lakenheath as a key service centre; and (3) cumulative transport impacts arising from the appeal application and three other applications, which the District Council has resolved to approve but where decision notices are pending. Natural England has also identified proximity to EU-designated sites and SSSI, including Breckland SPA and Maidscomb Hill SSSI. These are dealt with below.

3.1 Transport Impacts

The Parish Council has consistently raised concerns about the level of bus services available for residents of the proposed development, the potential impact of the level of new traffic on local junctions and the cumulative impact of the level of new housing that is being promoted in and around Lakenheath through the Local Plan process and being approved through the development control process. Specifically in relation to cumulative impacts the District Council has resolved to approve three planning applications (Eriswell Road ref F/2013/0394/OUT, 140 dwellings; Rabbit Hill

Covert ref F/2013/0345/OUT, 81 dwellings; and Briscoe Way ref F/2013/0660/FUL, 67 dwellings). When the cumulative impact is considered along with the appeal site (120 dwellings), the overall level of growth exceeds 400 dwellings.

Further, the Station Road scheme would add a further 375 dwellings which would bring the total to in excess of 750 dwellings.

In relation to the appeal scheme, the District Council has identified two possible disbenefits relating to highways and transport matters. The first is the risk that the appellant will fail to make amendments to the scheme that are required to overcome issues identified by the Highway Authority. The second is a belief that the proposed development will undermine the SPA mitigation strategy if capacity constraints at junctions south of Lakenheath cannot be overcome.

The Parish Council retains a concern about the cumulative impact of developments in and around Lakenheath and has expressed these concerns through its submissions to the Single Issue Review Local Plan process. The Parish Council will liaise with the appellant's transport consultant to explore the feasibility of delivering suitable mitigation measures that will properly mitigate the cumulative highway impacts resulting from the appeal development and other committed developments in the area.

It is acknowledged that what is deemed cumulative development may change between now and the time of the Inquiry depending on the outcome of the Station Road scheme. The Parish Council reserves the right to respond to any such change in circumstances in its submissions to the Inquiry.

Notwithstanding the Parish Council's concerns about the cumulative transport impact of development, the Parish Council will express support for the amendments to the scheme that have been recommended by the Highway Authority. Further, the Parish Council will liaise with the appellant's transport consultant to explore how the accessibility transport sustainability of the site can be further enhanced through additional commitments from the appellant to improve pedestrian routes between the site and key local facilities, such as open space, local shops and the primary school.

3.2 RAF operations

The MMO has recently (11 July 2016) lodged a holding objection in relation to development to the north of Lakenheath known as Land North of Station Road (ref DC/14/2096/HYB – "the Station Road scheme") in relation to military jet overflights and has requested a full noise impact assessment.

As a matter of principle the Parish Council has consistently objected to housing growth on the basis that military operations will give rise to unacceptable noise impacts which simply cannot be mitigated.

They are in no doubt that Broom Road will be affected by noise impacts for the reasons summarised by the Defence Infrastructure Organisation (DIO) consultation responses when the matter was before the District Council. Plainly the issue of noise impacts needs to be addressed by the Inquiry.

3.3 Lack of Key Service Centre facilities

In 2009-2010 during the period when the District Council was advancing its Core Strategy (quashed by the High Court in 2010), District Council officers identified Lakenheath as a Key Service Centre and

on this basis justified a substantial degree of housing growth in the district. However since 2010, the parish has lost many of the facilities that are recognised as essential Key Service Centre facilities.

The developers for the Broom Road scheme have agreed in principle to contributions to support community facilities including £30,000 toward extension of the existing Pavilion on the playing field, contributions to the Children's Play Area and civic amenity facilities as detailed in section 5 of the appellant's statement of case. Whilst welcome, these improvements are insufficient to justify the village being classified as a Key Service Centre as they do not replace facilities which have been lost.

3.4 Adverse biodiversity impacts

Natural England, statutory consultee, and others including Suffolk Wildlife Trust, have raised concerns with the proximity of the Broom Road application and other proposed development in the village because of EU and domestic designated sites important for their high biodiversity value. These include the Breckland Special Protection Area (SPA), Lakenheath Special Area of Conservation (SAC) and Maidsclough Hill SSSI and Local Nature Reserve. The Breckland SPA and SSSI are considered vulnerable to impacts arising from increased recreational use, in particular Maidsclough Hill given the close proximity.¹ The District Council considers that the development would exacerbate the impacts. Plainly these issues need to be addressed by the Inquiry.

The site is also constrained by a line of protected Pine trees on the eastern boundary which are subject to a TPO. According to internal consultation responses, the Pine trees "make up a distinctive pine line of land to the east of Lakenheath [and] are an important landscape feature characteristic of the area and of the Breckland landscape character site. The trees are of high visual amenity value." The Parish Council is in dialogue with the developers on ways to address this particular concern.

4. Conclusion

The Parish Council's participation in the Inquiry will be limited to evidence on transport impacts and it is anticipated that by the time of the Inquiry it will have agreement on a range of mitigation measures deemed essential to enable the development to proceed without severe adverse impacts. If that is the case it will not call a transport witness. If agreement has not been reached it will call a transport witness to give evidence on the impacts arising from the appeal scheme and the cumulative impacts arising from overall growth in the village.

5. Documents to be referred to in evidence or at the appeal

- Proposed Residential Development off Broom Road, Lakenheath: Transport Assessment, Kingdom TP, July 2014;
- Proposed Residential Development off Broom Road, Lakenheath: Transport Assessment Addendum, Kingdom TP, September 2015;
- Proposed Residential Development off Broom Road, Lakenheath: Interim Travel Plan, Kingdom TP, October 2015;
- Forest Heath LDF Transport Impacts, Aecom, 2009;

¹ The Lakenheath SAC is not accessible to the public as it is on MOD land. (verify I am right about that?)

- Technical Note: Forest Heath District Council Transport Study – Rev. 2, Aecom, May 2016;
- Lakenheath Cumulative Site Traffic Study, Aecom, November 2015.