

**Wild Ken Hill**  
**carl TONKS consulting**

**The Wild Ken Hill Experience**

**Highways Position Statement**

**Summary**

The Wild Ken Hill proposals were considered by Planning Committee on 3<sup>rd</sup> April 2023. The committee deferred a decision to seek more information from NCC on a feasibility assessment of the A149 / Lamsey Lane junction. The Local Highway Authority (LHA) had recommended approval of the proposals following detailed review of the Transport Assessment (TA) and further Technical Note 2 TA Addendum from **cTc**.

Planning Committee did not request any additional highways information or analysis from the applicant (only a request from NCC on its strategic work). However, a representative of the Parish Council had queried the highways data collected as part of the TA and on that basis, notwithstanding that the applicant, LHA and LPA are in agreement in relation to this, additional information has been procured by way of Automatic Traffic Count (ATC) in April 2023.

The ATC data has been assessed in relation to the original (TA) and the data presented therein, in addition to the update in Technical Note 2. The comparisons shown below confirm that the results published in the TA/Technical Note 2 and those produced from the 2023 ATC result indicate only minor and insignificant differences. Typically, variance in the traffic flows and capacity analyses are within what one would normally anticipate in daily variation and show a reduction in RFC and queuing from the 2023 ATC figures compared to those published in the TA/Technical Note 2, from the MCC. The only deleterious result in this comparison is an increase of only 0.01 in RFC for one movement. Only minor increases in queuing are seen when the 2023 ATC results are factored in and, again, these are within what one would normally anticipate by way of daily variation. Hence, this validates the original traffic survey data used in the TA. Further sensitivity tests factoring to the high tourist season (August) during the peak hours therein confirm spare capacity and low levels of queueing post development.

On that basis, it is clear that the Transport Assessment which has in any case been approved by the LHA, which therefore has no objection to the proposals provides a robust and sound basis for a positive decision on the application.

### **Statement**

1. **cTc** has produced a substantial quantity of analyses on behalf of Wild Ken Hill and examining key traffic and highway matters in regard to their proposed development, at Heacham Bottom and associated camping facilities at Mount Pleasant. The proposals were considered by Planning Committee on 3<sup>rd</sup> April, at which the decision was deferred in order to seek an update from NCC on a feasibility assessment of the strategic junction improvements, which the LHA has been seeking for some time. This was despite the Application being subject to no objection from Norfolk County Council, as Local Highway Authority (LHA) who, following detailed technical discussions and submission of additional information by the Applicants, were supportive of the proposal.

2. Since the Committee, correspondence from Heacham Parish Council has further emphasised their concerns in regard to the traffic analyses and identified detail points previously touched upon only in passing. This Position Statement will address the issues raised in that additional correspondence, and will demonstrate that the analyses submitted in the Transport Assessment were and remain fit for purpose and appropriate for the decision-making process. This notwithstanding, additional data collection has been undertaken, in order to provide additional confidence in the conclusions reached. This is also described below.
3. The latest correspondence from Heacham Parish Council refers to discussion within the Committee Meeting, at which it claims that the Highways Officer suggested a “**...data disparity...regarding COVID 19...had been added to the outcome of the dataset.**” This is a misunderstanding, in that what was agreed with Highways Officers was that the data collected was entirely appropriate in its basic form, however and this notwithstanding, further adjustments had been made in order to reflect periods of peak traffic demand and these adjustments had been agreed with Highways Officers as appropriate to permit a decision to be made in regard to the Application. The adjustments resulted in an onerous analysis scenario.
4. In regard to impact of COVID 19; the surveys were undertaken at the following periods;
  - Automatic Traffic Counts (ATCs) at two locations on Lamsey Lane
    - 2 weeks spanning 15<sup>th</sup> July to 28<sup>th</sup> July 2021; and
  - Manual Classified Count (MCC) – 24<sup>th</sup> July 2021.

5. In regard to the lifting of COVID 19 restrictions; on 22<sup>nd</sup> February 2021, then Prime Minister Boris Johnson published “...***the government’s roadmap to cautiously ease lockdown restrictions in England.***” This set out a four-stage approach to releasing constraints on travel and activity, each stage as broadly summarised below;

- Step 1 – Children and students return to face-to-face education.  
March 8<sup>th</sup>

“Wraparound childcare” and other supervised children’s activities recommence.

Care home residents permitted one regular visitor.

People permitted to leave home for outdoor recreation with their family or support bubble.

Some practical courses at University permitted to restart face-to-face teaching.

From 29th March “Stay at Home” Order ended, although some restrictions remained, including Work From Home where possible.

- Step 2 – Non-essential retail, personal care and public buildings re-open.  
April 12<sup>th</sup>

Most outdoor attractions re-open, although indoor mixing remained prohibited.

Indoor facilities (e.g. gyms, swimming pools) re-open, although mixing of family groups remains controlled.

Hospitality venues open outdoors only.

Self-contained accommodation (e.g. holiday lets) re-open.

Funerals permitted with up to 30 people and weddings/commemorative events with up to 15 people.

- Step 3 – Most social contact rules (outdoors) lifted, but gatherings May 17<sup>th</sup> to be no more than 30 people.

Outdoor performance venues re-open, although limits remain controlling inter-group contact.

Larger performances and sporting events permitted up to 1,000 people (indoor) and 4,000 people (outdoor).

Up to 10,000 people permitted in the larger outdoor venues.

Up to 30 people permitted to attend weddings.

- Step 4 – All legal limits on social contact removed. June 21<sup>st</sup>

Nightclubs re-open and no restrictions on large events.

6. In fact, implementation of the final Stage (Stage 4) of the Roadmap described above was delayed from June 21<sup>st</sup>, as planned, to July 19<sup>th</sup>. This resulted in the first four days of the pre-school holiday ATC being undertaken under Stage 3 of Lockdown Easing, whilst the remaining survey days were under Stage 4, which saw only minimal constraint. Those remaining constraints most notably included international travel, which was only permitted under specific circumstances or for specific reasons, which did not include family holidays. Consequently, the summer of 2021 saw a significant shift away from British families holidaying abroad and instead, remaining in the UK. This is likely to have resulted in additional demand for holidays in north Norfolk's holiday areas, with consequent impact on traffic flows on the A149, Lynn Road. On this basis, it was agreed with Highways Officers that the traffic surveys undertaken under Stage 4 of the Lockdown easing, as described above, would produce reliable results. Each week of the ATC was analysed independently; hence the second week was entirely within Stage 4 easing and the MCC was also under Stage 4 easing.
7. The reference to traffic flows having been factored to reflect increased demand is discussed in Section 5.2 of the Transport Assessment, which details the factoring of traffic surveyed flows, to reflect "peak of the peak" demand during August. The only data source available at the time of compiling these analyses enabled a comparison of March to August traffic demand and this was adopted in the capacity calculations presented. Notwithstanding this it is evident that the traffic survey undertaken in July and within the early stages of the school holiday period will have identified traffic demand much closer to the August holiday peak than would be the case in March of a "normal year" (ie non-COVID) and consequently, the application of a March to August factor to July surveyed flows clearly adds in a substantial and onerous safety margin to the analyses. This is the factoring to which the Highways Officer referred at Committee and clearly results in a forecast on which one can reasonably rely as over-stating the likely traffic demand.

8. Reference was made in the Parish Council submission to DfT summary figures for the years of 2020 and 2021, however, these include agglomerated traffic flows for periods spanning different Steps of the Lockdown easing, hence offer little, if any, insight into what was happening on the specific dates of the surveys.
9. It is clear, as stated above, that the Authority with technical competence to adequately review and comment on the analyses undertaken (ie. the Local Highway Authority) is in agreement with the data collected and the results of the subsequent calculations. It is agreed that those calculations appropriately reflect the observed levels of junction operation and that;
  - The junction is not currently operating typically in breach of its capacity;
  - The junction models and the conclusions drawn therefrom are appropriate, accurately reflect observations and are fit for purpose in determining the Application; and consequently,
  - There are no valid grounds for refusal of permission on highway or traffic impact.
10. Two key points feed into the above;
  1. Was the data collected at an appropriate time and therefore fit for purpose?  
And,
  2. Are the analyses undertaken using those data appropriate, hence adequate to rely on in determining the level of traffic impact of the proposals.

11. The data was collected at a time agreed with officers of the LHA as neutral and unlikely to be subject to any suppression due to the previous COVID lockdowns. As described in some detail above, at the time of survey, Britain was coming out of lockdown and the only remaining relevant constraint was on international travel. Consequently, British holiday-makers who may ordinarily have ventured abroad remained in the UK for their holiday.
12. As made clear to the Planning Committee, the data relied upon by objectors in fact confirms that over the month of the surveys, overall traffic demand was slightly below pre-COVID, however, that the beginning of the month was more severely constrained by COVID lockdown (Step 3), and consequently logic suggests that the latter part of the month (Step 4) actually saw traffic flows at, or above “normal” levels, in order at least in part to offset the impact of the early part of the month in lockdown. Consequently it is agreed with officers of the highway authority that the traffic surveys reflected traffic at, at least the level which could be expected under “normal” demand levels and potentially above.
13. The operating calculations confirmed that the junction operates significantly within its ultimate operating capacity in all forecast scenarios and will continue to do so into the future. The Ratio of Flow to Capacity (RFC) remains comfortably within design parameters for all scenarios examined and queue lengths remain small.
14. The capacity for traffic movements from Lamsey Lane on to Lynn Road is determined by the gaps between passing traffic on Lynn Road, which is predominantly a function of through-traffic volume, not traffic turning into, or out of Lamsey Lane and consequently when forecast generated traffic is added into the surveyed traffic flow, the junction continues to exhibit spare operational capacity and the additional turning traffic has little impact on junction operation.



15. This conclusion of the analyses reflects junction operation as witnessed on-site and is agreed by officers of the County Council, as competent technical authority with remit to control traffic and highway matters. It is clear from the above that the analyses confirm there is no defensible highway or traffic reason for refusal of Planning Permission in this instance.
16. Further to the above points, and these notwithstanding, **cTc** has commissioned further traffic surveys in the form of ATCs on both Lamsey Lane and Lynn Road. These were undertaken by Paul Castle Associates from 24<sup>th</sup> April 2023 to 3<sup>rd</sup> May 2023. This was done in response to criticisms from Heacham Parish Council, that the survey data agreed with Officers and used in the previously submitted TA and subsequent TA Addendum reports were not representative of typical traffic characteristics. Notwithstanding the above confirmation of the direct relevance of the data collected and in order to remove any potential criticism of the analyses, these additional surveys were commissioned. The full ATC reports are included as Appendix A.
17. The previous analyses from the MCC identified the following Saturday Peak Hours:
  - AM Peak Hour: 11:00 to 12:00
  - PM Peak Hour: 14:30 to 15:30
18. As the MCC records data in 15 minute time segments, a more precise peak hour is identified. The ATCs record hourly data and therefore identify peak hours to the nearest whole hour. Therefore, to ensure an accurate comparison and analysis, two PM hours from the ATC have been used, either side of the PM Peak Hour from the MCC. These details and comparisons are shown in Table 1, below.

**Table 1: MCC and ATC Comparisons**

Period	Location	Direction	MCC	ATC	Difference	Relevant Turning Movement	MCC to ATC Factor
11:00 – 12:00	Lamsey Lane	Eastbound	96	90	-6	Lamsey Lane to Lynn Road Left and Right	0.9375
		Westbound	214	196	-18	Not Used	N/A
	Lynn Road	Northbound	737	793	+56	Lynn Road S Left and Ahead	1.0760
		Southbound	581	586	+5	Lynn Road N Right and Ahead	1.0086
14:00 – 15:00	Lamsey Lane	Eastbound	79	92	+13	Lamsey Lane to Lynn Road Left and Right (14:30 – 15:00)	1.1646
		Westbound	223	208	-15	Not Used	N/A
	Lynn Road	Northbound	685	781	+96	Lynn Road S Left and Ahead (14:30 – 15:00)	1.1401
		Southbound	603	639	+36	Lynn Road N Right and Ahead (14:30 – 15:00)	1.0597
15:00 – 16:00	Lamsey Lane	Eastbound	103	85	-18	Lamsey Lane to Lynn Road Left and Right (15:00 – 15:30)	0.8252
		Westbound	210	205	-5	Not Used	N/A
	Lynn Road	Northbound	637	738	+101	Lynn Road S Left and Ahead (15:00 – 15:30)	1.1401
		Southbound	688	670	-18	Lynn Road N Right and Ahead (15:00 – 15:30)	0.9738

19. The above table demonstrates that, typically, traffic flow on Lamsey Lane is slightly lower in the 2023 ATC than the 2021 MCC; and slightly higher on Lynn Road. These are not vastly significant differences, and clearly any two traffic surveys conducted on different days would show a degree of variance. The differences observed are within the bounds of what one would normally expect by means of daily variation, especially once one allows for the passage of almost two years, during which normal traffic growth has occurred. Nonetheless, and in order to establish whether the variance has a bearing on the conclusions drawn previously regarding the Lynn Road / Lamsey Lane junction, further PICADY capacity analyses have been conducted using the factored base flows.
  
20. The factors stated above show the degree of variance between specific turning movements at the quoted times between the 2021 MCC and 2023 ATC. As such, they also act as temporal growth factors. Hence, once applied to the 2021 MCC base turning movements these are automatically growthed to 2023 turning movements; and are, therefore, directly comparable with the “2023 with Development” capacity analyses quoted in the TA. Figure 1 shows the factored turning movements with proposed development traffic as flow diagrams. Table 2, below, summarises the PICADY results, with the full PICADY report provided as Appendix B.

**Table 2: PICADY Results for the Lamsey Lane / Lynn Road junction.**

Scenario	Movement	From TA		Factored from 2023 ATC		Difference	
		Max RFC	Max Q	Max RFC	Max Q	Max RFC	Max Q
2023 + Dev AM Peak	Lamsey Lane to Lynn Road North	0.17	0.2	0.16	0.2	-0.01	0.0
	Lamsey Lane to Lynn Road South	0.16	0.2	0.15	0.2	-0.01	0.0
	Lynn Road to Lamsey Lane	0.13	0.1	0.13	0.1	0.00	0.0
2023 + Dev PM Peak	Lamsey Lane to Lynn Road North	0.40	0.6	0.34	0.5	-0.06	-0.1
	Lamsey Lane to Lynn Road South	0.32	0.5	0.27	0.4	-0.05	-0.1
	Lynn Road to Lamsey Lane	0.09	0.1	0.10	0.1	+0.01	0.0

21. The comparisons shown above confirm that the results published in the TA and those produced from the factors obtained from the 2023 ATC result in only minor and insignificant differences. Typically, variance in the capacity analyses show a reduction in RFC and queuing from the 2023 ATC figures compared to those published in the TA from the MCC. Hence, this validates the original traffic survey data used in the.

22. To further ensure a thorough and robust validation of the MCC survey data a seasonal uplift has been applied to the above analyses. As previously noted, the 2023 ATC from which the MCC has been factored was undertaken from 24<sup>th</sup> April 2023 to 3<sup>rd</sup> May 2023; as such the data has been further factored to August levels of base traffic flow. Norfolk County Council has provided additional seasonal monthly variation factors for the A149 at Heacham. This data confirmed the following AADF monthly variation factors (from the annual average month):
- April: 0.98
  - May: 1.08
  - April and May Average: 1.03
  - August: 1.37
23. The factor from April/May to August is, therefore:
- $1.37 / 1.03 = \mathbf{1.33}$
24. The summer uplift factor has been applied to the base flows; these are shown as flow diagrams in Figure 2, and with development in Figure 3. PICADY capacity analyses have been undertaken for these scenarios, and this is summarised in Table 3, below, with the full PICADY report presented as Appendix A.

**Table 3: PICADY Results for the Lamsey Lane / Lynn Road junction (August 2023).**

Scenario	Movement	Max RFC	Max Q
August 2023 No Dev. AM Peak	Lamsey Lane to Lynn Road North	0.25	0.3
	Lamsey Lane to Lynn Road South	0.35	0.5
	Lynn Road to Lamsey Lane	0.13	0.2
August 2023 With Dev. AM Peak	Lamsey Lane to Lynn Road North	0.25	0.3
	Lamsey Lane to Lynn Road South	0.40	0.6
	Lynn Road to Lamsey Lane	0.20	0.2
August 2023 No Dev. PM Peak	Lamsey Lane to Lynn Road North	0.25	0.3
	Lamsey Lane to Lynn Road South	0.29	0.4
	Lynn Road to Lamsey Lane	0.16	0.2
August 2023 With Dev. PM Peak	Lamsey Lane to Lynn Road North	0.61	1.4
	Lamsey Lane to Lynn Road South	0.65	1.4
	Lynn Road to Lamsey Lane	0.16	0.2

25. The capacity analyses quoted in the above table confirm that the junction operates within capacity, and with minimal queuing, both before and after the proposed development, even under this scenario of the peak hour within the peak month.
26. In conclusion, the 2021 MCC has been validated by the 2023 ATC data; and this supports the view of NCC Officers that accepted the TA and all of its' analyses. Furthermore, capacity analyses under peak hour in high season conditions show spare capacity remains at the Lamsey Lane / Lynn Road junction.

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