

# **RAF Croughton SATCOM**

**Transport Statement** 

February 2016

Defence Infrastructure Organisation



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### Issue and revision record

<b>Revision</b> A	<b>Date</b> 14/08/2015	<b>Originator</b> G Moore	Checker M Taylor N Huntley S Vassiliou	<b>Approver</b> S Tilbrook	<b>Description</b> Draft for client review
В	19/02/2016	M Taylor	W Jebb	S Tilbrook	Updated draft for client review

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### **Executive Summary**

Mott MacDonald has been commissioned by the Defence Infrastructure Organisation (DIO) to prepare a Transport Statement (TS) for a proposed new Satellite Communications (SATCOM) facility at RAF Croughton.

The proposals involve the development of new a SATCOM building and an associated administrative building in the centre of the base to replace existing, out-dated facilities. The proposals will enable the relocation of employees from existing buildings at the base to the new SATCOM facility and do not involve a change in the number of staff employed at the base.

This Transport Statement provides information on the traffic and transportation planning aspects of the proposals and forms part of a planning application for the development.

The base is located in a rural location in South Northamptonshire but is served by a bus service that runs between the towns of Brackley and Banbury.

As the proposals involve the relocation of existing base employees only, there is no intensification of use or increase in vehicle movements anticipated. Therefore there will be no off-site highway or traffic impacts arising from the development.

It has been recommended that a Construction Traffic Management Plan (CTMP) should be produced that should confirm issues such as construction working hours, construction traffic routes and will identify an appropriate area for contractor staff to park. Such a CTMP should be discussed and agreed with the relevant highways authorities, in this case Northamptonshire County Council, Oxfordshire County Council and Highways England.

**Transport Statement** 



### 1 Introduction

#### 1.1 Introduction

Mott MacDonald has been commissioned by the Defence Infrastructure Organisation (DIO) to prepare a Transport Statement (TS) for a proposed new Satellite Communications (SATCOM) facility at RAF Croughton in Northamptonshire, close to the border with Oxfordshire.

The project involves the development of a new SATCOM facility and administrative communications control facility and will enable these existing functions to be consolidated into purpose-built facilities. The new buildings are required to replace the inadequate and inefficient communications facilities and to provide purpose-built space to fully enable current communications operations.

Ancillary plant buildings, up to five new satellite terminals, car parking, access roads and footways are also proposed as part of the development.

The proposals will enable the relocation of current SATCOM and administrative employees from existing buildings at the base to the new facilities. The existing buildings will remain vacant prior to demolition. The proposals do not involve a change in the number of staff employed at the base, or in the number of trips generated by staff.

This Transport Statement provides information on the traffic and transportation planning aspects of the proposals and forms part of a planning application for the development.

#### 1.2 Report Content

Following this introductory section, the report is structured as follows:

- Section 2 summarises the existing conditions at the site and the surrounding area, including a review
  of the local highway network and accessibility of the site by sustainable modes of travel;
- Section 3 provides a review of pertinent transport-related planning policies at both the local and national level;
- Section 4 presents additional details on the proposed development, including proposed car parking provision;
- Section 5 summarises the likely traffic and transportation impacts of the development; and
- Section 6 provides a summary and identifies the key conclusions of the report.



### 2 Existing Conditions

#### 2.1 Site Location

RAF Croughton is located in the South Northamptonshire District of the County of Northamptonshire, close to the border with Oxfordshire. The A43 trunk road runs along the eastern boundary of the site with the town of Brackley located around 4.5km to the north and the M40 motorway 5km to the south.

The site is bound to the north by the B4031, to the east by the A43 and by agricultural land to the south and west. The village of Croughton is around 1km to the west of the main entrance to the base. The location of RAF Croughton is shown in Figure 2.1.

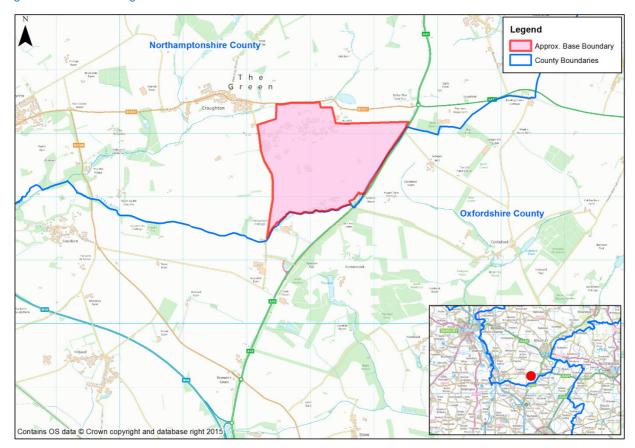


Figure 2.1: RAF Croughton Location

Source: Mott MacDonald

The existing SATCOM facility is located in the east of the site within a perimeter service road that loops around the base. The existing administrative communications control building, from which administrative staff will be relocated to the proposed new facility, is located in the north of the base. The approximate



locations of the existing SATCOM building and administrative communications control building is shown in Figure 2.2.



Figure 2.2: Existing SATCOM and Administrative Buildings Locations

Source: Mott MacDonald

#### 2.2 RAF Croughton

#### 2.2.1 Base Background

RAF Croughton operates as a United States Air Force (USAF) communications base and is home to the 422<sup>nd</sup> Air Base Group, a component of the 501<sup>st</sup> Combat Support Wing. The base operates one of Europe's largest military switchboards and processes approximately one-third of all U.S. military communications in Europe. The base is also home to the US Department of State's Regional Information Technical Center (RITC), which provides communications systems transmission and support services to U.S. embassy and consulate offices between Europe, Asia, Africa and the U.S.



The base is a 692-acre site that contains a mix of administrative, community services, housing, industrial, outdoor recreation and open space land use classifications. USAF housing for RAF Croughton is located on base and in Caversfield, around 9 miles south of the base.

Employees at the base are provided with many essential services and community facilities, including a medical and dental clinic, shop, fitness centre and a library. An elementary (primary) school, for children between the ages of 4 to 11, is also located at the base. The provision of such services on the base will help to reduce the need for employees to travel off-site either during the working day and, for those living at the base, outside working hours too.

The majority of buildings and facilities are located to the north of the perimeter service road. This includes the existing administrative communications control building, from which staff will be relocated to the proposed new facility.

The existing SATCOM facility and various antennae are located in the centre of the base within the perimeter service road. The existing SATCOM facility is within a separately fenced area.

#### 2.2.2 Existing SATCOM Operation

There are 84 people employed at the SATCOM facility, which is operational 24 hours a day, 7 days a week.

A further 111 employees are based at the existing administrative communications control building in the north of the base. Working hours for administrative employees are more akin to traditional office working hours, understood to be 07:00 to 17:00.

#### 2.2.3 Site Access

Vehicular traffic currently enters and exits the base via a priority controlled junction on the B4031, around 600m to the east of Croughton village and 2km to the west of the A43/B4031 roundabout.

Vehicles pass through the 'Village Gate', which comprises a guard point, a vehicle inspection area beneath a canopy, a small area of parking and a small outbuilding for processing non-pass-holders. The B4031 gate is manned 24 hours per day, 365 days a year and functions as the main Entry Control Point (ECP) for the base.

The site access junction with the B4031 is a three-arm priority controlled junction with the base access road forming the minor arm at the junction. There are two lanes on the exit to the base, with a separate lane each for left-turning and right-turning traffic.

An additional ECP/access is located on the A43 to the southeast of the base. The A43 ECP is an unmanned secure access and is only used by-appointment by oversize vehicles and for emergency use.



The access junction with the A43 is 'left-in, left-out' only with diverge and merge slip lanes provided on the A43 northbound carriageway.

Within the base, the existing SATCOM facility is accessed via a Controlled Access road, which connects with the base perimeter service road. Controlled Access roads at the base are not intended for use by privately owned vehicles and people employed at the SATCOM facility are required to park their vehicles outside the controlled area (see below).

#### 2.2.4 Internal Road Network

The perimeter service road operates as a two-way road that provides access to various facilities and buildings around the base.

The internal network of roads within the RAF Croughton base have been classified as 'Arterials', 'Collectors', 'Local' and 'Controlled Access' roads with the perimeter road classed as being an 'arterial' road.

All arterial and collector roads within the base are paved and marked to show centrelines, turn arrows and pedestrian crossing points. Local roads are also paved but, unlike arterial and collector roads, they are generally unmarked and do not function as a through-route for traffic travelling around the base.

#### 2.2.5 Car Parking

There are over 1,100 parking spaces within the RAF Croughton base with approximately 1,000 designated for use by privately operated vehicles and some 90 spaces allocated for Government owned vehicles. Parking space is provided in numerous car parks of varying sizes throughout the base and in 'on-street' spaces adjacent to the base's internal roads. The vast majority of spaces are located in the north of the base in proximity to the majority of buildings.

Parking at the existing SATCOM facility is provided in the form of 30 spaces located next to the base perimeter road, around 200m from the building. A continuous pedestrian footway connects these parking spaces to the SATCOM facility. Some spaces are located within the SATCOM fenced compound area but it is understood that the spaces are not available for use by privately owned vehicles.

Employees at the existing administrative communications control building currently park within various existing car parks in the north of the site.

#### 2.3 External Highway Network

As outlined above, there is an internal network of roads that provide access to the various buildings and car parks within the base.



The north of RAF Croughton is bound by the B4031, from which vehicular access to the base is provided. The B4031 is a single-carriageway road that runs in an east-west direction, connecting the A43 in the east to the B4100 at Aynho in the west.

The speed limit on the B4301 in the vicinity of the base is 40mph, which increases to the National Speed Limit (60mph for cars on single-carriageway roads) around 200m to the east of the base access junction. The speed limit reduces to 30mph as the road passes through Croughton village. The road is also subject to a 7.5 tonne weight limit through Croughton village.

Around 2km to the east of the RAF Croughton access junction, the B4031 forms the western approach at a four-arm roundabout with the A43 and the A421. The A43 is a dual-carriageway trunk road, managed and maintained by Highways England and provides a strategic link from the M1 in the north to the M40 in the south. The A43 was used by approximately 35,000 vehicles on the stretch of road to the south of the B4031 roundabout in 2014<sup>1</sup>.

In this area the A421 is a single-carriageway road that runs in an east-west direction, connecting the A43 in the west to Buckingham, Milton Keynes and the M1 in the east. The A421 has an average daily flow of around 8,000 vehicles in the vicinity of the A43 junction<sup>2</sup>.

#### 2.4 Public Transport

A bus stop, which includes a shelter, is located on the base's main access road between the security check points and the B4031 junction.

Service 499 operates along the B4031 and calls at the RAF Croughton stop by turning into the site at the main access junction. The service runs between Brackley and Banbury, calling at the villages of Evenley, Croughton, Aynho, Charlton and King's Sutton along the route. It runs Monday to Saturday with a daytime frequency of around one service every two hours.

The earliest services call at RAF Croughton at 07:30 (services from Brackley) and at 11:05 (services from Banbury), while the last services leave the base at 16:49 (towards Banbury) and at 19:05 (towards Brackley).

<sup>&</sup>lt;sup>1</sup> DfT Traffic Counts: http://www.dft.gov.uk/traffic-counts/cp.php?la=Northamptonshire#73845

<sup>&</sup>lt;sup>2</sup> DfT Traffic Counts: http://www.dft.gov.uk/traffic-counts/cp.php?la=Northamptonshire#73846



### 3 Policy Review

#### 3.1 Introduction

This Section reviews transport-related national and local policies with particular relevance to the proposed SATCOM development at RAF Croughton.

#### 3.2 National Planning Policy Framework, March 2012

The National Planning Policy Framework was published in March 2012 and sets out the Government's planning policies for England and how they should be applied.

This document discusses how a Transport Statement or Transport Assessment needs to be produced to support any developments which could generate significant amounts of movements and should take into account the following (para 32):

- "The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that costs effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of the development are severe."

The document reiterates that the planning system is 'plan-led' and that applications must be determined in accordance with relevant local development plans.

#### 3.3 South Northamptonshire Local Plan

The new Local Plan is currently being prepared and is replacing the previous system of Local and Structure plans. The new Local Plan will consist of a range of documents that, taken together, will provide a spatial strategy for South Northamptonshire District.

Local Plan documents are being prepared by the West Northamptonshire Joint Planning United, which is formed by a team of officers that report to the West Northamptonshire Joint Strategic Planning Committee. This committee comprises Councillors from Northampton Borough and Daventry and South Northamptonshire District Councils as well as Northamptonshire Council.

#### 3.3.1 West Northamptonshire Joint Core Strategy, December 2014

The West Northamptonshire Joint Strategic Planning Committee adopted the West Northamptonshire Joint Core Strategy Local Plan in December 2014. The Joint Core Strategy document forms part of the new Local Plan.



The Joint Core Strategy document sets out the long-term vision and objective for the West Northamptonshire area (Daventry District, Northampton Borough and South Northamptonshire District) for the plan period up to 2029. The document includes strategic policies that are intended to 'steer and shape' development.

Section 6.0 ('Connections') of the Joint Core Strategy document identifies that a change in travel behaviour is required "in order to achieve wider sustainability goals and meet future travel needs of visitors and residents".

Section 6.0 also identifies that "the location of housing, employment, retail, education, health and other facilities" is an important influence on how people choose to travel. It goes on to state that "the design, density and location of services within new developments should maximise the opportunity for trips by non-car modes."

'Policy C2 – New Developments' of the Joint Core Strategy identifies that "development will be required to mitigate its effects on the highway network and be supported by a transport assessment and travel plan".

#### 3.4 Northamptonshire Transportation Plan

The Northamptonshire Transportation Plan, which forms the County's current Local Transport Plan (LTP), sets out the transport policies, objectives and vision for the period to 2026. It is made up of several separate documents, the first of which is titled the Northamptonshire Transportation Plan and is discussed below.

#### 3.4.1 Northamptonshire Transportation Plan, March 2012

The overall aim of the plan is "fit for purpose", which means creating a transport "network that delivers what Northamptonshire needs to be able to function plus what it needs to be able to grow". This aim is broken down into the six following objectives, which guide the Transportation Plan:

- "Fit for... the Future creating a transport system that supports and encourages growth and plans for the future impacts of growth, whilst successfully providing benefits for the County.
- For... the Community through the transport system help to maintain and create safe, successful, strong, cohesive and sustainable communities where people are actively involved in shaping the places where they live.
- **For to... Choose** ensuring that the people of Northamptonshire have the information and the options available to them to be able to choose the best form of transport for each journey that they make.
- **Fit for... Economic Growth** creating a transport system that supports economic growth, regeneration and a thriving local economy and successfully provides for population and business growth.
- **Fit for... the Environment** to deliver a transport system that minimises and wherever possible reduces the effect of travel on the build, natural and historic environment.



• **Fit for... Best Value** – being clear about our priorities for investment and focusing on value for money by prioritising what we spend money on and how it can be beneficial for the county as a whole and search for alternative sources of funding."

Strategic policy 3 states that the County will "ensure that all new developments are well connected by public transport and walking, cycling and motor vehicle routes, to the existing transport network" in order to "allow ease of movement... and provide access to employment and key services".

## 3.4.2 Northamptonshire Highway Development Management Strategy, December 2013

The Northamptonshire Highway Development Management Strategy document, approved and adopted in December 2013, forms one of the 'daughter documents' to the overarching Northamptonshire Transportation Plan.

The document identifies how it ties in with the six over-arching Northamptonshire Transportation Plan objectives, as follows:

- "Fit for... the Future these policies aim to minimise the impact of development on the transport and highway network and secure appropriate levels of funding.
- For... the Community these policies aim to minimise the impact of development on surrounding communities.
- For to... Choose these policies seek to ensure that a wide range of travel choices are available for all new developments.
- Fit for... Economic Growth the policies will encompass all new employment sites in the county.
- **Fit for... the Environment** the policies will encourage the development of travel plans that encourage less environmentally damaging travel.
- Fit for... Best Value the policies encourage appropriate levels of developer funding to deliver value for money solutions to mitigate transport and highway impacts."

The document identifies the following factors will be considered when Northamptonshire County Council review planning applications:

- Impact on highway safety;
- National and local planning policies;
- Relevant planning history of the site;
- Existing and future capacity of the local highway network;
- Design of any new access or road layouts:
- Impact on the quality of streetscape and place;
- Environmental issues;
- Convenience to users of the highway and of the development; and
- Published design standards.



Impacts of development should be appropriately assessed by the preparation of Transport Assessments, Transport Statements and Travel Plans. All developments are required to demonstrate that their likely impacts are fully mitigated and that there is a 'nil-detriment' impact. The County Council will consider that any development that has demonstrated that it has 'nil-detriment' will have met the National Planning Policy Framework's requirement for there to not be a "significant residual cumulative impact".

#### 3.4.3 Northamptonshire Parking Strategy, January 2013

The Northamptonshire Parking Strategy is a further 'daughter document' to the overarching Northamptonshire Transportation Plan.

Parking Policy 5 within the strategy identifies that the County Council's policy for non-residential developments is found within the Parking - Supplementary Planning Guidance (March 2003) and that all non-residential developments should be assessed against this document to determine the maximum parking requirement.

#### 3.4.4 Northamptonshire – Parking Supplementary Planning Guidance, March 2003

As identified above, the County Council's policy for parking provision at non-residential developments is set out within this document.

The document identifies maximum car parking provision for various land uses. However, the specialist nature of the proposed development at RAF Croughton is not included within the document that instead states that parking provision for other land uses should be considered on their merits. As is discussed in the following Section, the proposed parking provision for the new SATCOM facility is based on guidance published by the USAF.



### 4 Development Proposals

#### 4.1 Overview of Development Proposals

The proposals involve the development of a new SATCOM 'Priority Level 1' building (PL1) within a fenced compound and a new administrative building. Both new buildings will be located in the centre of the base, within the base's perimeter service road, a short distance to the west of the existing SATCOM facility.

Ancillary plant buildings, up to five new satellite terminals, car parking, access roads and footways are also proposed as part of the development. Additional detail on the car parking proposals is set out in Section 4.2.

The development proposals are shown in plans included in Appendix A.

The PL1 building will accommodate a total of 84 employees and will operate 24 hours per day, 7 days a week. Some personnel will work on a shift basis however the building is designed to accommodate all 84 employees in the event of a recall. The administrative building will accommodate 111 employees, who will work more typical office working hours on a single shift basis (understood to be between 07:00 and 17:00).

The proposed new facilities will enable the relocation of employees from the existing SATCOM and administrative buildings to the new facility. All employees at the new facility are existing employees at the base and the proposed development does not involve an increase in staff at the base.

The existing SATCOM and administrative buildings will become vacant prior to their planned demolition some 24 months later. The demolition of these existing buildings, totalling around 6,200m<sup>2</sup> of property space, will be subject to a separate planning application(s).

#### 4.2 Proposed Parking Provision

It is proposed to provide a temporary car park in the proximity of the new facility, which will be used prior to the demolition of the existing SATCOM building. The temporary car park will provide a total of 117 parking spaces, of which six will be for disabled users. As shown on the proposed site layout, the temporary car park will be located between the existing SATCOM building and the proposed new facility and will be accessed from the new access road.

Following the demolition of the SATCOM building it is proposed that a permanent 117 space car park is constructed on the site of the existing building. However, the demolition of the existing buildings, including the SATCOM facility, will be covered by a separate planning application.

Guidelines for parking provision at USAF bases are identified within a 'facility requirements' document of the Air Force Manual (AFMAN 32-1084 Facility Requirements). This document specifies that development of the nature of the proposed SATCOM facility be provided with parking at a level of at least 60% of assigned personnel. With 195 personnel at the new facility, this equates to 117 parking spaces (at 60% provision). The proposed level of car parking is designed to accommodate shift change over periods and an element of increased usage during training events or emergency periods (as is currently the case).

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It is noted that parking is already available at the base for the existing employees, including parking in the north of the base for administrative employees. However, given the nature of the activities at the base, it is necessary to provide parking in close proximity to the facilities.

Parking provision across the whole base will be reviewed as part of longer term proposals at the base that will see employees transfer to RAF Croughton from other bases. These proposals will form part of a separate planning application at a later date.

As part of the development proposals, a total of 24 secure and covered cycle parking spaces will be provided. This provision is based on guidance set out in Northamptonshire County Council's Supplementary Planning Guidance – Parking document, which identifies required levels of cycle parking provision for various land uses. The most similar land use in the guidance to the proposed facility at RAF Croughton is considered to be B1 Office, which should be provided cycle parking at a ratio of one space per 200m² of gross floor area (GFA). With a total combined proposed GFA of approximately 4,800m², this equates to a total cycle parking provision of 24 spaces. Given the distances between the two buildings and between the buildings and the car park, it is proposed to provide some spaces at the proposed admin building and some spaces within the car park, which is the closest the spaces can be located to the PL1 building due to security restrictions. The proportion of spaces to be provided in each location will be based on the number of staff employed at each building.

#### 4.3 Proposed Access

Vehicular access to RAF Croughton will remain unchanged with vehicles continuing to access the base from the B4031 and the A43 providing access for emergencies and for oversized vehicles.

As shown in the proposed layout plan, access to the new temporary car park will be taken from a new access road, which will connect into base's internal road network on the existing SATCOM building access road.

As explained above, it is proposed to construct a new permanent 117 space car park following the demolition of the existing SATCOM building. However, the demolition of the existing buildings, including the SATCOM facility, will be covered by a separate planning application.

New service roads will be constructed to provide direct access to the new buildings. However, these will not be available for use by privately owned vehicles.



## 5 Development Impact

#### 5.1 Traffic Impact

As explained above, the proposed development will enable the relocation of current SATCOM and administrative employees from existing buildings at the base to the new facility. The existing buildings will remain vacant prior to demolition.

No additional permanent employees will be employed at the base following the completion of the proposed development.

As the proposals involve the relocation of existing base employees only, there is no intensification of use or increase in vehicle movements anticipated. Therefore there will be no off site highway or traffic impacts arising from the development.

#### **5.2** Construction Impact

It is anticipated that the construction phase of the development will last approximately 18 months. This allows for the construction of the new buildings, new service roads and pedestrian walkways.

Throughout the construction period it is anticipated that regular construction working hours will be Monday to Friday, between 07:30 and 17:30 hours.

An initial estimate has been prepared of the number of HGV movements to be generated by construction activities. This has been based on a number of assumptions related to the building activities and quantities. Over the 18 month construction period it is expected that there will be an average of just under 30 one-way HGV movements per week which equates to 6 one-way movements per day. The number of movements will peak at around 80 one-way movements per week (just over 15 per day) albeit this quantum of traffic is only expected to be generated over a short period of time.

The profile of weekly HGV movements is shown in Figure 5.1 below.

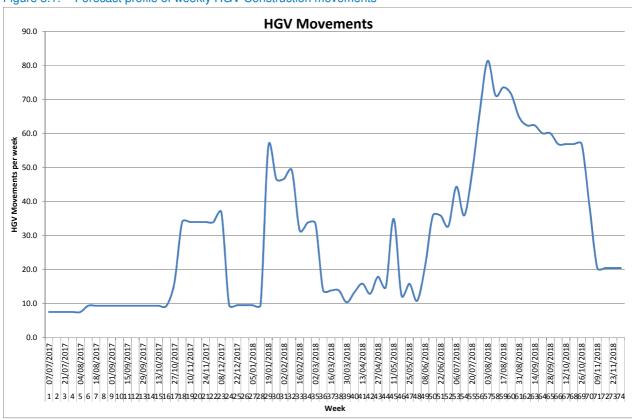


Figure 5.1: Forecast profile of weekly HGV Construction movements

Source: Mott MacDonald

It is envisaged that the B4031 access will be used by most construction-related traffic. The B4031 is the most appropriate access for smaller vehicles, such as contractors' cars and light goods vehicles, and the Village Gate is the best place for the necessary security checks to take place.

It is anticipated that the A43 access would be more suitable for occasional oversized vehicles. This would reduce the potential for larger vehicles conflicting with local traffic on the B4031. In addition, the base's internal road network, which is narrow in places and with some sharp bends, is generally not suitable for accommodating oversized vehicles.

It is recommended that, prior to commencement of construction work at the site, the appointed contractor should produce a Construction Traffic Management Plan (CTMP), which will confirm issues such as working hours, construction traffic routes and will identify an appropriate area for contractor staff to park and further details regarding construction traffic. Such a CTMP should be discussed and agreed with the relevant highways authorities, in this case Northamptonshire County Council, Oxfordshire County Council and Highways England.

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It is also recommended that appropriate measures to reduce the impact of construction vehicles and particularly HGVs, are implemented. This should include measures such as the provision of wheel-washing facilities on-site and dust-covers on vehicles reduce the spread of mud and dust onto the surrounding highways. The contractors will also be provided with instructions to ensure, for example, that they travel to/from the site safely and drive in an appropriate and considerate manner.



### 6 Summary and Conclusions

#### 6.1 Summary

Mott MacDonald has been commissioned by the Defence Infrastructure Organisation (DIO) to prepare a Transport Statement (TS) for a proposed new Satellite Communications (SATCOM) facility at RAF Croughton.

The proposals involve the development of a new SATCOM building and an associated administrative building in the centre of the base. The new facility is required to replace inadequate and inefficient communications facilities and to provide purpose-built space to fully enable current communications operations.

The proposals will enable the relocation of current SATCOM and administrative employees from existing buildings at the base to the new SATCOM facility. Following the relocation of staff, the existing buildings will remain vacant prior to demolition. The proposals do not involve a change in the number of staff employed at the base, or in the number of trips generated by staff.

This Transport Statement provides information on the traffic and transportation planning aspects of the proposals and forms part of a planning application for the development.

#### 6.2 Conclusions

The proposals involve the relocation of existing base employees only and therefore there is no intensification of use or increase in vehicle movements anticipated on the external highway network.

In light of the above, the Transport Statement has concluded that there will be no additional traffic movements outside the base and therefore there will be no off-site highway or traffic impacts arising from the proposed development.

This shows that the proposed development will have 'nil-detriment' and it can be concluded that the proposals meet the National Planning Policy Framework's requirement for there to not be a "significant residual cumulative impact". Therefore, in accordance with Northamptonshire County Council's policy on considering development proposals, there are no transport-related grounds for the application to be refused consent.

It has been recommended that a Construction Traffic Management Plan (CTMP) should be produced that should confirm issues such as construction working hours, construction traffic routes and will identify an appropriate area for contractor staff to park. Such a CTMP should be discussed and agreed with the relevant highways authorities, in this case Northamptonshire County Council, Oxfordshire County Council and Highways England.

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## **Appendices**

Appendix A. Proposed Site Plan \_\_\_\_\_\_\_18



# Appendix A. Proposed Site Plan

Please refer to drawings MMD-354717-C-DR-00-XX-9001 and MMD-354717-C-DR-00-XX-9003.

