

RESPONSE TO FRESSINGFIELD CUMULATIVE TRAFFIC ASSESSMENT



Illustration 1: A typical day on Fressingfield's roads (outside village shop in New St. Conservation Area)

SUMMARY – in August 2017, Suffolk County Council (SCC) required the cumulative impact of the five planned Fressingfield developments to be assessed. The resulting Cumulative Traffic Assessment (CTA) produced by Create Consulting fails to meet a number of national and local requirements. It does not:

- provide the right information - omissions include village character, public transport, pedestrian and cyclist traffic, agricultural, heavy goods and emergency vehicle movements
- assess environmental impact – environmental impact is ignored
- use the right data - vehicle trip rates are used instead of person trip rates
- assess the right area - a fatal accident just outside the village in 2013 is not included
- assess the right period - an accident in 2017 at Jubilee Corner is not included.
- assess the right needs – the needs of disabled people and children are not assessed
- prioritise pedestrians - pedestrian traffic is not prioritised
- assess parking - the impact on parking in the village is ignored
- assess heritage - the impact on the heritage of the village is ignored

Bizarrely, the CTA concludes that because there were not many accidents in the past, the increase in pedestrian and vehicular traffic – which it acknowledges to be *'significant'* – will not cause any increase in accidents in the future. This is like saying that because it was not raining yesterday, it will not rain today.

SCC estimates an extra 584 residents, including 63 primary school children to result from the five developments, increasing the village population - and potentially the pedestrian and vehicular traffic - by 57%. This includes 105 new residents from the 46 houses approved so far. Figures used in the CTA for baseline and future vehicular traffic do not inspire confidence. There are none for pedestrian traffic. For example, pedestrian and vehicular traffic generated by the new scout hut is specifically excluded. SCC notes that Fressingfield's public transport *'is severely limited'* and *'of no use for commuting'*. It is impossible to see how these developments comply with the government's National Planning and Policy Framework (NPPF) requirement that *'developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes maximised.'*

No amount of mitigation can make what is clearly unsafe, safe, nor what is unsustainable, sustainable. No independent Road Safety Audit has been undertaken, despite the evidence in correspondence from SCC of the likelihood of increased road safety risks.

In its comments, SCC also required an understanding from MSDC of the level of growth it considers appropriate for Fressingfield. MSDC has only recently completed the first stage of its new Local Plan and does not expect to complete it before spring 2019, so this question cannot be answered. These developments pre-empt those strategic decisions, and are therefore premature.

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1. BACKGROUND – in addition to the two planning applications already approved for Fressingfield (Red House Farm and Land off School Lane), three further applications have been lodged. SCC originally recommended rejection of the Red House Farm (4410/16) proposal on safety grounds¹, although these concerns were apparently resolved as permission was later given. On the 14th August 2017, SCC issued a holding objection on the three pending developments requiring a further Joint Traffic Assessment of the cumulative impact of all five developments,² superseding the Transport Assessments and Statements originally provided with the applications, which only covered impact of the developments individually.

The CTA was produced by Create Consulting in response the holding objection. An additional Transport Note³ was also provided by consultants La Ronde Wright in October 2017, in relation to Post Mill Lane (1632/17).

The Table below sets out the estimates by SCC of the additional residents these developments will bring. There are many infrastructure implications of this cumulative development but the CTA was required by SCC's Highways Department to address those relating to the road network within the village and the consequent impact on access/from the A143.⁴

DEVELOPMENT	NO. OF HOUSES	NO. OF NEW RESIDENTS*	
		ALL	PRIMARY SCHOOL CHILDREN**
Land off School Lane (3872/16 Granted)	18	41	
Red House Farm (4410/16 Granted)	28	64	
John Shepherd Road (1432/17)	99	228	
Stradbroke Road (1449/17)	85	196	
Post Mill Lane (1648/17)	24	55	
SUB TOTALS	254	584	63
EXISTING	444	1012	140
TOTALS IF ALL PROPOSALS APPROVED	698	1596	203
PERCENTAGE INCREASE ON EXISTING	57%	57%	45%

* estimated by SCC in the relevant Strategic and Infrastructure comments for each proposal.

** estimated by SCC in their 28th June 2017 Strategic Comments on Stradbroke Rd (1449/17)

These assumptions are merely estimates. Final numbers could be greater, especially given that the figures are derived from outline applications. These figures of course ignore the additional residents (and therefore traffic) which will be generated by the many developments in the surrounding area, such as in the 110 new houses proposed in the village of Weybread just over 2 miles away.



Illustration 2: Ordinance Survey Map of Fressingfield

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2. STRATEGIC PLANNING AND TRANSPORT POLICY AND LEGISLATION - There are a range of transport requirements that cannot be met in respect of these developments, calling into question their location in the small village of Fressingfield.

2.1 The National Planning Policy Framework (NPPF)

- states that *'plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.'* The location of these developments in Fressingfield will not minimise travel – the reverse, as there are few if any employment opportunities in the village. Sustainable transport will not be maximised because of the difficulties created for all classes of pedestrian, as detailed below, and the lack of public transport.
- requires authorities to *'focus significant development in locations which are or can be made sustainable⁵,* with Transport Assessments required *'to establish whether the residual transport impacts of a proposed development are likely to be "severe", which may be a reason for refusal, in accordance with the NPPF.'*⁶ It is very hard to see how expanding the village by 57% without expanding its infrastructure can be described as sustainable in transport terms. The residual impacts have yet to be evidenced because the CTA is inadequate in so many respects, as described below.

2.2 Prematurity - SCC stated in their responses to 1648/17 and 1432/17 that: *"the cumulative development from other proposals will need to be taken into account and SCC expects to have further discussions with the District Council about what level of growth it considers appropriate for this settlement."*

The village have not been party to any such discussions about what level of growth is appropriate for Fressingfield, and the draft joint local plan is only at consultation stage. It includes relevant discussion about spatial distribution and rural growth. In the section of the Draft Local Plan⁷ on Infrastructure, MSDC stated: *'All new developments should be supported by and have good access to all necessary infrastructure Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all necessary requirements arising from the proposed development.'* Considerations of cumulative impacts for more than one development are also to be required.

Government guidance on planning⁸ clearly states that development applications may be deemed premature *'where a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the Development Plan Document by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the Development Plan Document.'*

As the level of growth for Fressingfield has yet to be determined by the Local Plan and as its requirements on infrastructure are clearly not met, this set of proposals leading to a very substantial cumulative effect, are premature.

2.3 Traffic Management and Road Safety - Under Section 16 of The Traffic Management Act 2004, SCC has a duty *'to secure the expeditious movement of traffic'* on its road network, or that of other authorities. There are national intervention powers for failure to fulfill this duty.

Under S39 of the Road Traffic Act 1988, SCC has a general duty *'to promote road safety.'* It is therefore very surprising that no Road Safety Audit appears yet to have been required. National guidance⁹ requires local authorities to inspect the site and require road safety audits *'where appropriate'*. It seems unwise not to have required this, especially given the clear evidence of SCC's concerns about road safety as discussed below.



Illustration 3: Traffic congestion, adj. to the shop, New St.

The casual conclusion of the CTA that the cumulative effect of the development will be *'significant'* extra traffic of all types and *'increased accident risk'* clearly fits the circumstances in which a Road Safety Audit

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is required – where *motorised traffic volumes and speeds, and the degree of potential conflict between different user-groups* are going to be significant¹⁰.

It is *'a fundamental principle'*¹¹ that a Road Safety Audit Team is independent from the Design Team, unlike the CTA which was conducted by Create Consulting who produced the transport documents relating to 1449/17 and 1432/17, for one of the developers.

National guidance¹² advises authorities to *'put procedures in place that allow rational decisions to be made with the minimum of bureaucracy, and that create an audit trail that could subsequently be used as evidence in court.'* In the absence of an independent Road Safety Audit, there appears to be no such audit trail.

2.4 Mid Suffolk District Council (MSDC) Policies - MSDC has not met its five-year housing supply, which has important consequences for its housing policies. Under paragraph 14 of the NPPF, permission should be granted in these circumstances unless *'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework, taken as a whole.'* Evidence is presented below on the adverse impacts that the cumulative effects of the developments would generate in transport terms.

MSDC approved Transport policies within its Local Plan in September 1998. In June 2016, it specifically retained as valid policies T1, T2, T4-T14. In their June 2017 judgement,¹³ the Supreme Court ruled that it is only *'policies for the supply of housing'* that are deemed out of date under the NPPF where an authority cannot demonstrate a five-year supply of housing. Other policies, including transport, remain valid despite the lack of the five-year housing supply, so the CTA must be measured against MSDC's transport policies.

MSDC's Transport Policy notes¹⁴ the intention to *'direct most new developments to settlements that are served by public transport and there is an option for using bus or rail services for journeys to work.'* Fressingfield does not meet any of these criteria.

There is a limit to the mitigation that can be provided to make what is unsafe, safe and what is unsustainable, sustainable. MSDC's transport policy is absolutely clear on this limit: *In no circumstances will MSDC view the offer of infrastructure improvements or other benefits as reasons to permit a planning application for development which is clearly contrary to planning policy or otherwise unacceptable for land use or environmental reasons*¹⁵

3. Shortcomings of the CTA - Three levels of requirements apply to the CTA:

- **National** - the NPPF and associated guidance, the Department of Transport *Guidance on Transport Assessments (TAs)* and its *Manual for the Streets*.
- **County** – SCC specific concerns about the cumulative impact on Fressingfield
- **District**– MSDC's relevant policies (transport and parking)

The CTA has serious failings on all levels, as described below.



Illustration 4: New St Conservation Area

The most serious flaw running through the CTA is to use the Crashmap data from 2011 to 2016, where there was a lack of accidents, as a justification for the conclusion that the increase in traffic – which the CTA itself acknowledges to be *'significant'* – will not cause any increase in accidents. This is like saying as it was not raining yesterday, it is unlikely to rain today even though there are clouds today but there were none yesterday. It is nonsense.

The flaws in the CTA mean that any decisions made on the basis of the document would be vulnerable to challenge.

3.1 Flawed information - The following information is prescribed by the NPPF¹⁶ for TAs, but missing from the CTA:

- **Character** - neighbouring uses, amenity and character
- **Public transport** - public transport, including provision/ frequency of services
- **Movement** – movements by *all* modes of transport resulting from the development and vicinity
- **Different types of traffic** - current traffic flows including different modes and *type* of vehicles

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- **Environmental** - likely environmental impacts of transport related to the development

More specifically, the NPPF¹⁷ requires that *'all developments that will generate significant amounts of traffic' provide 'the forecast level of trips by all modes of transport likely to be associated with the development.'* The CTA includes no assessment of different types of traffic, such as agricultural or heavy goods vehicles, not to mention emergency vehicles. One could expect the level of emergencies of all types (medical, fire or police) to increase proportionately with the increase in population. The assessment of access for emergency vehicles is therefore a serious omission.

No reference is made to construction traffic during the building of an extra 254 houses in this small village, nor of the hazards to pedestrians of heavy goods vehicles during this period.

Department of Transport guidance¹⁸ states that to understand fully the context of a development, data should include— *'as a minimum' - 'the quantification of the person trips generated from the existing site and their modal distribution, or, where the site is vacant or partially vacant, the person trips which might realistically be generated.'* The only information provided in the CTA relates to vehicular trip rates, not person trip rates, so there is no actual assessment of the pedestrian or cyclist traffic.

3.2 Flawed assessments: The assessments contained in the CTA contain many serious flaws, which would undermine any decisions based upon its conclusions. These flaws are grouped into seven themes below.

a) Safe access for all - At national level, the NPPF requires TAs to ensure *'safe and suitable access to the site can be achieved for all people'*¹⁹, and to include an assessment of walking and cycling and the capacity of the footpath network²⁰. It must also ensure that developments do not *'create barriers to access within the local community'*²¹ by making the road or footpaths less safe particularly for children and older or disabled people, leading to more use of the car for safety reasons, even for short distances.

Proposed public footpath exit to New St from Post Mill Lane 1648/17



Looking west

Looking east

Illustration 5: Proposed Public Footpath Exit to New St from Post Mill Lane 1648/17



Illustration 6: Parking on Church St. adj. 14th c. church

In its strategy document on play spaces²², SCC required that *'routes to children's play spaces are safe, and accessible for all children and young people.'* One of the objectives of MSDC's Transport Policy²³ is *'to ensure that proper account is taken of all modes of transport.'*

Not assessed: the CTA does not differentiate between types of pedestrians, ignoring the different needs of children (in a village with a primary school) and older people (in a village already having an older population above average²⁴). Nor is there any assessment of the cumulative impact of the developments on the pedestrian routes to the play space adjacent to the sports club, from each of the new

developments, nor to and from the proposed additional play space within the John Shepherd Rd development (1432/17). More children will also be walking to school, to the school bus pick up points and to the new scout hut, but the impact on them has not been assessed.

b) Safe and secure layouts, prioritising pedestrians - The NPPF requires developments to *'create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.'* and *'give priority to pedestrian and cycle movements, and have access to high quality public transport facilities'*²⁵.

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In relation to 1449/17 and 1432/17, SCC has pointed out²⁶ the lack of a footway along part of New Street and the narrow and discontinuous footways in Laxfield Road and Stradbroke Road. It notes: *'Our specific concern would be the effects of additional vehicular and pedestrian traffic in the area of New Street / B1116 Laxfield Road/ Stradbroke Road/Church Road where there is an absence of footways, noting the need to understand any 'detrimental impact on residents walking or cycling.'* It also notes the true position on public transport in the village: *'sustainable transport options are highly constrained. Currently there is only a severely limited bus service that serves the village and it is of no use for commuting. It is not practical to enhance this service'²⁷* and *'Fressingfield is currently very poorly served by scheduled bus services.'²⁸* Assessment was also required by SCC of *'the safety impacts of numerous minor accesses across the proposed footway east of Stradbroke Rd'²⁹*

MSDC's Transport Policy sets out the matters to which it will have regard in planning decisions, including *'whether the needs of pedestrians and cyclists have been met.'³⁰* The same policy requires assessment of *'the suitability of existing roads giving access to the development in terms of the safe and free flow of traffic and pedestrian safety.'*



Illustration 7: Exit footpath to New St, adj. twin T-junction

pedestrian casualties in rural areas are more likely to occur when children are walking along the road rather than crossing it.'³² With the arrival of an estimated 63 new primary school children, this is very relevant.

Not assessed: although the CTA considers traffic and queuing at junctions, it only assesses traffic congestion. It does not properly assess the impact on cyclists or different types of pedestrians. This is because it only uses vehicular trip rates not person trip rates as required. Traffic of all types along the specified roads themselves as well as at junctions is not assessed, even though only 26% of casualties occur within 20 metres of a junction³¹. ROSPA notes: *'rural roads are narrow and often have no pavement or crossing facilities. Child*

Crashmap data used in the report only relates to reported accidents where there has been an injury. It is not known how many accidents occurred which were not reported or where there was no injury. Furthermore, by limiting the data to 2011-2016, the CTA misses an accident reported in 2017 involving an injury at the twin T-junction shown in the photo above, which has an existing blind footpath exit within metres of it. The map below shows all accidents for all 19 years available, and tells a very different story.

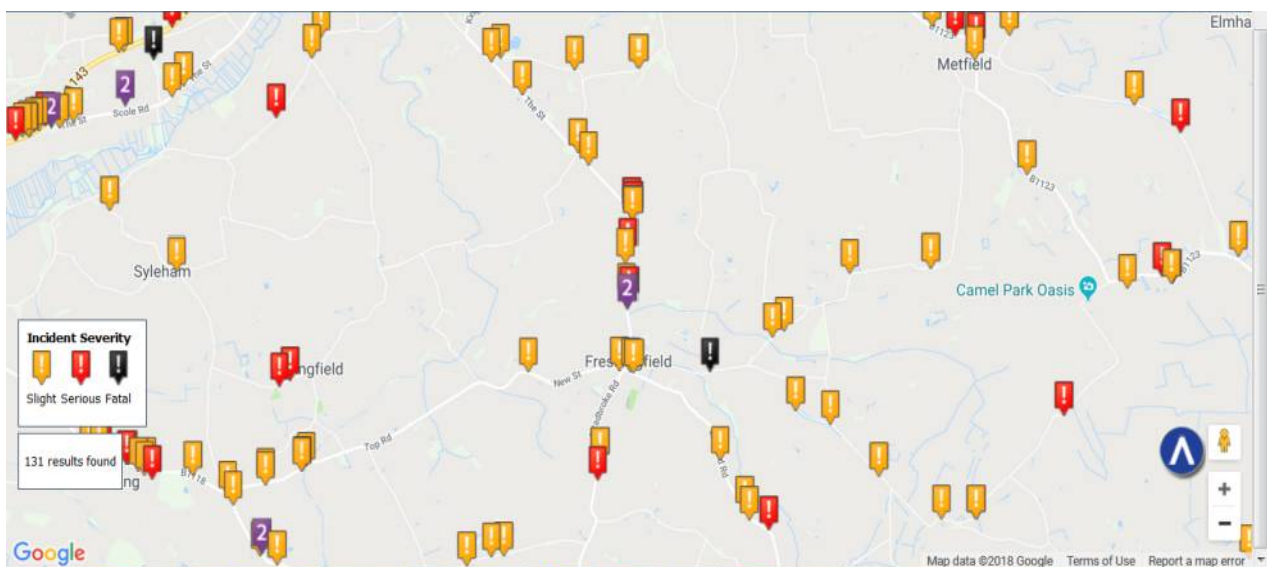


Illustration 8: Crashmap data for Fressingfield and environs, 1999-2017

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By limiting the area of the search to the junctions within the village, a fatal accident in 2013 at the junction of Gules Green Lane and Buckingham's Hill has been excluded.

Even after analysis of a very selective data set, *'some increased accident risk,'* is casually acknowledged in the CTA, but no attempt is made to prioritise the movements of pedestrians and cyclists who will be exposed to such risks. Although *'there will be significant levels of additional pedestrian and vehicular movements,'* the remarkable conclusion is offered that, because the current levels have not generated many accidents (which is false), higher levels will not do so either.

The CTA does not mention public transport, let alone assess whether it is of high quality.

The pedestrian experience – whether generically or stratified by type of pedestrian – is not assessed for any of the developments nor their access routes to village amenities such as Sancroft Hall, the shop, school and medical centre, with some feeble analysis only of the presence of footways to bus stops. As there is only one bus a week anyway, it is not clear why this route is particularly relevant. The photographs of the West and East views at the exit from the footway proposed onto New St from Post Mill Lane, offer just one example of how unsafe this proposed layout will be, particularly for older people and children going to the primary school, emerging onto a bend on a narrow road with no pavement and no street lighting. So far from being prioritised, the needs of pedestrians are actually ignored in the CTA.

c) Disabled people - The NPPF requires consideration of *'the needs of people with disabilities by all modes of transport'*

MSDC's Policy T11³³ requires *'highway schemes including roads, footways, parking and pedestrian priority areas to be designed to accommodate the needs of people with disabilities.'*

Both MSDC and SCC will be at risk of a claim for breach of their disability equality duty under the Disability Discrimination Act 2005 if assessments are not required of the needs of disabled people in relation to the increased traffic and greater hazards for disabled pedestrians.

Not assessed: CTA does not even mention people with disabilities.

d) Parking and deliveries

Both the NPPF and national guidance require proposals to *'accommodate the efficient delivery of goods and supplies'*³⁴ and TAs to assess *'the available parking facilities in the vicinity of the site and the impact that development could have upon them.'*³⁵ *'The vicinity'* of all permitted and proposed developments in this small village include the village shop and medical centre on New Street, the school on Stradbroke Road and two pubs on Laxfield Road.



Illustration 9: Medical Centre Car Park



Illustration 10: Reduced roadwidth during shop delivery, New St

MSDC notes: *'vehicles parked on the street can easily disrupt the free flow and safety of traffic, create a hazard for pedestrians particularly if no foot way exists and in environmentally sensitive locations can detract from the appearance of surroundings especially in conservation areas.'*³⁶ Policy T7 notes the need to design parking taking account of *'the character and appearance of its surroundings the effects of environmental and residential amenity and the likely benefits for traffic safety.'*

Not Assessed: The CTA is silent on parking. The photos of current parking arrangements outside the shop and medical centre on a typical day, with current population, traffic flow and delivery levels is illustrative of how hazardous any increase in housing in the village would be.

e) Road Safety Overall - National guidance³⁷ requires that *'Site inspections should be conducted to determine if the proposed location and design of access roads (including visibility/sight distance restrictions) would create an increased potential for accidents.'*

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SCC commented, in relation to the approved 4410/16, that that development alone (28 houses – a little over a tenth of what is now proposed) would generate an increase in pedestrians walking along New Street, which *'will be detrimental to highway safety and contrary to the objectives of the NPPF'*. Building on this, their holding objection to 1449/17 and 1432/17³⁸ mandated assessment of the cumulative impact of the developments, and how to *'allow safe interaction of vehicles and pedestrians.'* SCC's estimate of 63 extra primary school children walking to and from the school from all the developments should be the context for such an assessment, along with the impact of more older people likely to be walking to the shop and surgery, including in the dark during the winter months.

In their initial recommendation for refusal of 4410/16, SCC³⁹ also noted that traffic speeds along New Street *'frequently exceed the 30mph limit.'*

MSDC notes the safety shortcomings of rural roads and the particular hazards of heavy agricultural traffic. *'The majority of rural roads are proving inadequate for the traffic now carried [this in 1998]. Inevitably rural roads follow ancient field boundaries characterised by numerous right angle bends.'*⁴⁰ They also note the high incidence of agricultural heavy goods vehicle on rural roads (a considerable number of which pass through the village) and the problem of speeding which villages experience.⁴¹

Not assessed: The CTA does not meet the NPPF requirements on traffic flow as it only considers traffic congestion and does not cover, for example, the visibility of traffic to pedestrians at the junctions of roads or footpaths.

'Safe interaction' between traffic and pedestrians is not assessed. Passing comment is made on *'pedestrian traffic'*, but no attempt is made to stratify the needs of different pedestrian groups, as the NPPF requires (see para 3.2 above). The CTA is somewhat selective in the traffic flow that it does analyse, with pedestrian and vehicular traffic generated by the new scout hut, which is in a different location to the old one and will involve children walking to it, specifically excluded



Illustration 11: Fressingfield 14th c. church, with vicarage in rear

The CTA does not assess speed at all - does not mention the word in fact. It focuses only on volume of traffic at junctions without differentiating between types of vehicle. Any such assessment would have been incomplete anyway as it has not provided person trip rates, as required.

f) Heritage - National Guidance⁴² requires assessment of *the 'heritage of historic resources where they interact with development-generated transport'*⁴³

MSDC's policy on conservation and heritage states: *'Priority will be given to protecting the character and appearance of conservation areas and the district planning authority will expect new building, alterations or other forms of development to conserve or enhance their surroundings. Similar care will be taken when considering proposed*

*development on land, which lies adjacent to a conservation area....'*⁴⁴

Under Section 72 of the Listed Buildings and Conservation areas) Act 1990, planning authorities have a duty to pay *'special attention .. to the desirability of preserving or enhancing the character or appearance of that area'*, when exercising their planning functions. They also have a duty *'from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.'*⁴⁵ The most recent conservation area appraisal is ten years old, so this work is long overdue especially in areas such as Fressingfield where conservation areas and local character are at risk.

There is no sign of either duty being fulfilled in relation to the developments in Fressingfield.



Illustration 12: Fressingfield 14th c. church. Guildhall(Fox and Goose restaurant) in rear (1509)

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Not Assessed: the CTA makes no mention of Fressingfield's heritage, nor the need to preserve its conservation area, and provides no information to assist MSDC in their work on the conservation area.

g) Cumulative increase in traffic - The NPPF acknowledges that it is permissible to refuse planning permission *'on transport grounds where the residual [after any improvements] cumulative impacts of development are severe.'*⁴⁶ National Guidance⁴⁷ requires that *'the cumulative effects of multiple potential developments should be assessed, so as to ensure that interaction effects of different combinations of sites on the highway network are fully understood'*.

In their response to 1648/17, 1432/17 SCC required that the cumulative impact of that development be assessed including access to/from the A143. In their holding objection, SCC reiterated this requirement to assess *'the cumulative impact of all the developments on the highway network.'*⁴⁸

MSDC's Transport Policy T10 sets out that in considering planning applications, it will have regard inter alia to:

- *'the provision of safe access to and egress from the site*
- *the suitability of existing roads giving access to the development, in terms of the safe and free flow of traffic and pedestrian safety;*
- *whether the amount and type of traffic generated by the proposal will be acceptable in relation to the capacity of the road network in the locality of the site'*

Not Assessed: Given that the wrong type of trip rates have been used in the CTA (as explained in paragraph 3.1 above) it is hard to see how the cumulative traffic impact can be assessed at all. The CTA does not refer to access to and from the A143 and does not provide the data needed for MSDC to assess these applications against T10 policies.

The Transport Note from La Ronde Wright used the same limited Crashmap data as the CTA and did not properly assess cyclist or pedestrian traffic or differentiate between types of pedestrians including disabled people.

4. CONCLUSION - The CTA is a seriously flawed document and does not serve the purpose of assessing the cumulative impact of the five proposed developments on Fressingfield.

It is hard to see how the cumulative impact of these proposed developments – and their impact individually in some cases – on transport and road safety in the village can be other than highly detrimental, rendering the developments unsustainable and generating demonstrable significant adverse impacts.

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SAFE (Supporters Against Fressingfield Expansion)

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1 SCC to MSDC letter 06.03.17
2 Sam Harvey Senior Development Management Engineer to MSDC 14.08.17
3 *Post Mill Lane Fressingfield Transport Note* October 2017 La Ronde Wright
4 Ibid
5 Para 17 NPPF Core Planning Principles
6 *Guidance: Travel Plans, Transport Assessments and Statements*
7 6th March 2014 [Ministry of Housing, Communities & Local Government](#)
8 *MSDC Draft Joint Local Plan Consultation August 2017*
9 *The Planning System: General Principles* Office of the Deputy Prime Minister 2005
10 *Guidance on Transport Assessments* Department of Transport 03.07 para 4.25
11 *Manual for the Streets* para 3.7.6 Department of Transport 2007
12 *Manual for the Streets* para 3.7.6 Department of Transport 2007
13 *Manual for the Streets* para 2.6.9 Department of Transport 2007
14 Suffolk Coastal District Council v. Hopkins Homes and Richborough Estates v. Chester East
15 Borough Council 10th May 2017
16 MSDC Transport Policy adopted 09.98 and retained 06.16 para 2.7.38 and T13
17 MSDC Transport Policy adopted 09.98 and retained 06.16 T4
18 <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>
19 NPPF para 32
20 *Guidance on Transport Assessments* Department of Transport 03.07 paras 4.7 and 4.57
21 NPPF para 32
22 *Guidance on Transport Assessments* Department of Transport 03.07 para 4.14
23 *Guidance on Transport Assessments* Department of Transport 03.07 para 4.3.3
24 *Play Matters: A Strategy for Suffolk* SCC 16.0310
25 Transport Policy MSDC adopted September 1998 retained June 2016, para 2.7.3
26 Fressingfield Village Profile
27 NPPF para 35
28 Sam Harvey Senior Development Management Engineer Email to MSDC 14.08.17
29 SCC Letter to MSDC re 1432/17 dated 23rd May 2017
30 SCC to MSDC re 1432/17 23.05.17
31 Sam Harvey Senior Development Management Engineer email to MSDC 14.08.17
32 MSDC Transport Policy adopted 09.98 and retained 06.16, T10
33 *Rural Road Safety Factsheet* Royal Society for the Prevention of Accidents February 2017
34 Ibid.
35 MSDC Transport Policy adopted 09.98 and retained 06.16, para 2.7.3
36 NPPF para 35
37 *Guidance on Transport Assessments* Department of Transport 03.07 para 4.16
38 MSDC Transport Policy adopted 09.98 and retained 06.16, T11
39 Ibid 4.25
40 Sam Harvey Senior Development Management Engineer Email to MSDC 14.08.17
41 SCC to MSDC re 4410/16 06.03.17e
42 MSDC Transport Policy adopted 09.98 and retained 06.16, para 2.7.14
43 Ibid 2.7.15
44 Ibid
45 Ibid 4.38
46 MSDC Transport Policy adopted 09.98 and retained 06.16, T11
47 *S 71 Planning (Listed Buildings and Conservation Areas) Act 1990*
48 *NPPF for Para 3*
Guidance on Transport Assessments Department of Transport 03.07 para 5.12
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