

Your Ref:
Our Ref:
Date: 31st July 2018



All planning enquiries should be sent to the Local Planning Authority.

Email: planningadmin@baberghmidsuffolk.gov.uk

The Planning Officer
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For the Attention of: Vincent Pearce

Dear Vincent

TOWN AND COUNTRY PLANNING ACT 1990 -

PROPOSAL: Various Planning Applications in Fressingfield

LOCATION:

- **1648/17 Land off Post Mill Lane, 24 dwellings**
- **1449/17 Land off Stradbroke Road, 85 dwellings**
- **1432/17 Land off Shepherd Road, 99 dwellings**
- **3872/16 Land off School Lane, 18 dwellings**
- **4410/16 Red House Farm, 28 dwellings**

Introduction

Planning applications had been submitted to develop a number sites around the village of Fressingfield totalling 250 dwellings. The cumulative highway impact of these developments has been of concern to the Local Planning Authority and local residents. This letter sets out the reasons for the Highway Authority's response. The three aspects of highway impact are considered namely, congestion (capacity) sustainability and highway safety.

Policy and Guidance

Underpinning the Highways Authority's response to any planning application are national and local planning policy and guidance. The relevant local policies in this case are the Mid Suffolk District Council's Local Plan and supporting documents.

National Guidance is the National Planning Policy Framework (NPPF) supported by Planning Policy Guidance (PPG). The NPPF places great emphasis on a presumption in favour of sustainable development.

Paragraph 11 of the NPPF states that where the development plan is absent, silent or the relevant policies are out of date, granting permission unless:

- Any adverse impacts of doing so would significantly outweigh the benefits, when addressed against policies in this Framework taken as a whole or
- Specific policies in the Framework indicates development should be restricted.

When considering recent planning applications and planning appeals, the Local Plan has been considered out-of-date. Therefore less weight can be put on these policies and NPPF guidance will dominate.

In transport terms NPPF paragraph 32 states that decisions should take account of:

- Any opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce 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 cost effectively limit the significant impacts of the development. Development should only be prevented or refused on highway grounds where the residual cumulative impacts of developments are severe.

Paragraph 35 Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore developments should be located and designed where practical to:

- Accommodate the efficient delivery of goods and supplies
- Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities
- Create safe secure layouts that minimise conflicts between cyclists or pedestrians, avoiding street clutter and where appropriate, establish home zones
- Incorporate facilities for charging plug in and other ultra-low emission vehicles; and
- Consider the needs of people with disabilities by all modes of transport

Paragraph 187 directs local authorities to look for solutions rather than problems and decision takers at every level should seek to approve applications for sustainable development where possible.

MSDC Core strategy

Fressingfield is regarded by MSDC in its Local Plan Core Strategy as a Primary Village where small scale housing growth to meet local needs will be appropriate. Development Control Policies will identify the criteria for determining the size and scale of development in these primary settlements.

Road Safety

The safety of road users is the most important factor when considering the impact of developments. The consideration is based on the past history of a location, the likely impact of traffic arising from the development and the degree which any harm can be mitigated.

As noted above, the NPPF directs that the transport impact would have to be demonstrated as severe otherwise development should not be refused. Crash data from Fressingfield shows that there are few recorded crashes in the area over the past ten years (usually 5 year records are considered) and only one in the central core of the village. In its initial response, the Highways Authority expressed concern regarding the increase in vehicles and pedestrian movements in the central core of the village where footways are narrow or absent. As a result of these concerns the developers have proposed mitigation work to reduce speeds and hence the risks to pedestrians. On balance considering the low frequency of crashes and the proposed mitigation measures the Highway Authority's opinion was that these are not considered to be severe.

Transport Assessment

Suffolk County Council as the Highway Authority, requested a traffic assessment to be completed to assess the cumulative impact on the highway network from the sites.

Analysis of the five proposed developments in Fressingfield (Create Consulting Engineers Fressingfield Cumulative Traffic Assessment LT MA/P16-1151 October 2017) indicates that the additional traffic will not result in junctions exceeding theoretical capacity. Thus it is considered that the impact of the developments, in terms of congestion, is of low significance.

We have reviewed the Transport Assessment and the data supplied with these applications, the summary of our findings are as follows:

. The traffic assessment shows:

- The B1116/C515/New Street, B1123/B1116 and B1116/C504 Low Road junctions' are within future capacities therefore future queue lengths are acceptable,
- With the trip rates (with TEMPRO plus 25% growth rate) applied to PICADY model gave minimal delays and all the junctions and they will continue to work within capacity in the future with the introduction of the developments.

- There is only one recorded injury accident in the area
- The proposed carriageway and footway improvements on Stradbroke Road/New Street junction improves access to village amenities for pedestrians in this area.

In your email dated 5th June 2018 you asked a number of questions regarding highway issues. These are answered below:

Change of Road Surface Colour (Questions 1,,2, and 3)

DfT Traffic Advisory Leaflet 11/00 states that schemes with physical measures such as build-outs are most effective but coloured surfacings when associated with gateways, have some speed reduction value. In the case of Fressingfield, hard physical measures such as ramps or build outs have limited potential due to the poor forward visibility in the core of the village, proximity of buildings and heritage issues. Also the existing layout with junctions and sharp bend in the centre of the village act as physical restraints to speed. On New Road, the restricted road widths, limited forward visibility, parked cars and proximity of buildings to the road have a similar effect on speed; although the developer has proposed a ramp at the eastern end of New Road in addition to these.

With such forms of mainly visual traffic calming there is a risk that regular drivers become 'immune' to these features. However, these same drivers are familiar with the area and should be aware of the road layout with the likelihood of pedestrians using the road where footways are absent.

Additional Signage (Question 4)

There are some hazard warning signs already in place to make drivers aware of the features of the road (eg bend warning and give-way signs). The current proposals are indicative and additional signing would be considered if appropriate. The proposals include additional SLOW markings on the approaches to the B1116 / Stradbroke Road junction but a balance will need to be made to avoiding creating additional clutter, particularly in conservation areas.

Road Safety (Questions 5 and 6)

At the request of the Planning Officer, the collision records over the past 10 years were examined. Usually, the Highway Authority would examine such data over the latest 5 years. This data is compiled by Suffolk Constabulary using a set format. Only crashes resulting in injury are recorded and data recording the residency of the driver or other occupants is not recorded.

There is no accepted method of calculating the increased frequency of collisions with rising vehicle, pedestrian and cycle movements. However, the latest statistics are that in the UK there are 531 injuries per billion vehicle miles. In terms of statistical likelihood of a collision this is low. Generally as the volume of traffic increases the speed of the vehicles reduces and this, in turn, results in less serious injuries.

The data indicates that there have been 8 crashes in Fressingfield over the past ten years. Of these, 1 involved a cyclist emerging onto the road. Two crashes resulted in fatalities, the assessment concluding that speed was likely to be a contributory factor in both. Most crashes involved loss of control due to a variety of factors; speed, weather, inexperience, illness and avoidance of an animal in the road. Only two crashes occurred in the centre of the village, the remainder being at the fringes of or out of the built-up area of the village. In summary the number of crashes is low with no concentration at a specific location and no consistent cause.

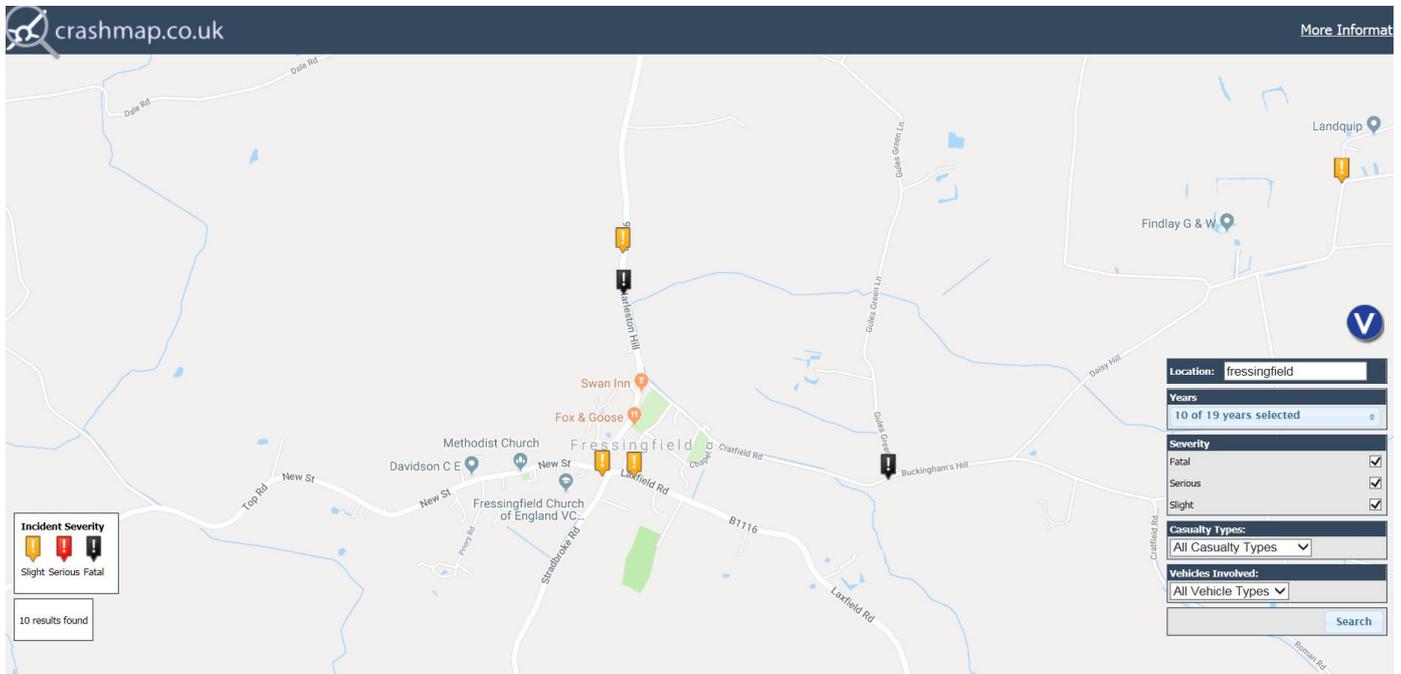


Fig 1: Crashmap plan of Fressingfield showing recorded crashes 2008-2017 (10 years)

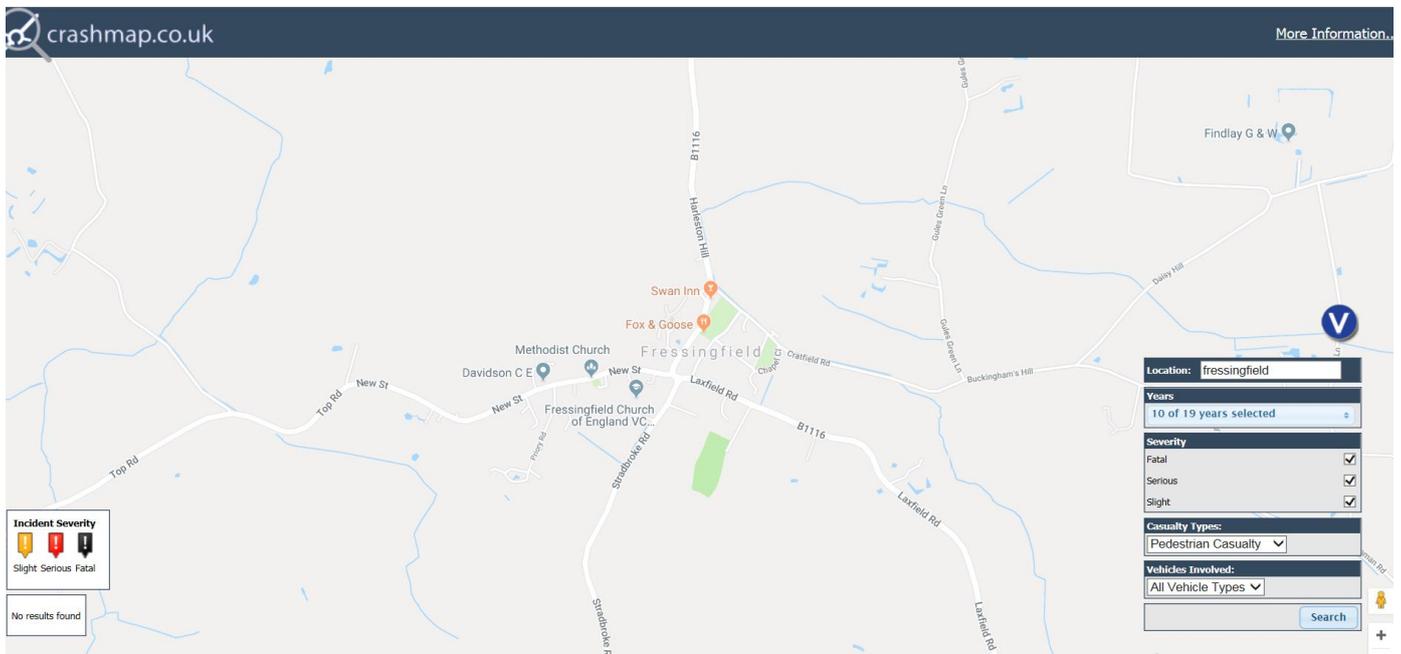


Fig 2: Crashmap plan of Fressingfield showing recorded crashes involving pedestrians 2008-2017 (10 years)

Date	Ref	Location	Vehicles	Casualties	Comments
30/09/2008	L00016123	B1116 S Nunnery Farm	1 car	1 slight	Single vehicle of loss control
16/10/2009	L00017430	B1116 Harleston Hill	1 car	1 fatal	Loss control, speed, impairment
05/07/2010	L00018226	B1116 Laxfield Road, Elm Cottage	1 cycle 1 car	1 slight	Cyclist entering road from property
08/02/2012	0052112	B1116 300m N C504	1 Van 1 Car	1 slight	Loss control (weather)
20/05/2013	SCEA7149113	Cratfield Road	1 HGV 1 Motorcycle	1 fatal	Collision, possible speeding
03/11/2013	SCEA7550613	B1116 Laxfield Road, Nunnery Farm	1 motorcycle	1 serious	Inexperience
03/02/2016	1645562	B1116 Nunnery Farm	1 car	1 slight	Loss of control due to animal in road
16/05/2017	17202802	B1116 / B1117 junction	1 car	1 slight	Loss of control, illness.

Table 1: Summary of crashes resulting in injury that have occurred in Fressingfield over the past 10 years

As Highways Authority, SCC has to assess whether the cumulative development will increase the risk of road users to the degree it is considered severe. In the case of Fressingfield, there has been a single crash that has resulted in injury in the core of the village in the past ten years. Compared to other similar locations, this is a low frequency. Regarding reporting of crashes, failure to report a crash to the police involving an injury is a criminal offence therefore this data should be considered robust.

I am not aware of data that shows any relationship between vehicle numbers and crashes. There has been research on changes of speed relating to crashes (DfT Traffic Advisory Leaflet 11/00). This report summarises the findings as a 1mph reduction in mean speed results in a 4.3% reduction in all-injury collisions, and a 10% reduction in KSI collisions.

Forecasting the potential of additional traffic from these developments is finely balanced. The increase numbers of vehicles and pedestrians is likely to increase the frequency of the risk but in balance, the proposed mitigation and additional traffic flows are likely to decrease speeds, hence decrease the degree of harm.

On balance it is our opinion that while there will be a significant impact, not severe, hence why we have not recommended refusal in this case.

Pedestrian Access (Question 7)

The proposed pedestrian access for the Stradbroke Road site will be construction of a new footway along the frontage and footpath linking the north of the site to the highway with a crossing point linking to the existing footway on the west side of the road. This would provide adequate visibility for pedestrians at this point to cross.

The existing pedestrian access from the proposed Shepherd Road development onto New Road does not currently have good visibility to either side at the point of exit. The highway boundary is located at the edge of the carriageway and thus the applicant does not control the land necessary to control this visibility in perpetuity. This is a similar issue to that at Ash Tree Close opposite this location.

Details of proposed mitigation works (Question 8)

Details are shown on Create Consulting Engineers Ltd drawing 03/500 that forms part of both the Stradbroke Road and Shepherd Road applications. It is, in principle, accepted by the Highway Authority that these measures can be delivered. Where it is possible to do so, the design parameters such as road and footway widths given in Manual for Streets will be used.

Summary

In terms of cumulative impact of these developments on the highway network and users in Fressingfield we have considered congestion, sustainability and road safety. Based on the available data, the knowledge we have gained ourselves and from submissions by local residents we consider that;

- **Congestion:** There will be an impact but as the baseline traffic is low and the numbers of additional vehicles is not of excessive scale we consider this will be at the lower end of significance in planning terms
- **Sustainability:** The lack of footways and cycleways creates barriers to sustainable travel to and from the developments to local services. Strategically, Fressingfield lacks some of the facilities necessary to encourage widespread sustainable transport. In planning terms, the combined impact is to the moderate to high degree of significance.
- **Road Safety:** The fact that pedestrians and cyclists have to share the road with vehicles including a small number of HGV's and agricultural vehicles causes the Highway Authority some concern. However, as planning guidance states that decisions should be made based on factual evidence such as crash data and that a degree of mitigation is possible we have to conclude that the cumulative impact of development will be at the higher level of significance but not severe.

Yours sincerely,

Steve Merry
Transport Policy and Development Manager
Growth, Highways and Infrastructure