Your Ref: Our Ref:

Date: 2nd November 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

Following the July 2018 revisions to the National Planning Policy Framework (NPPF) Suffolk Country Council has reviewed its position regarding planning applications 1648/17, 1449/17 and 1432/17. The significant change in the NPPF is para 109 that states that development should only be prevented or refused on highway grounds if there would be an *unacceptable impact on highway safety*, or the residual cumulative impacts on the road network would be severe. This revises the previous guidance that stated that development should only be refused where the residual cumulative impacts are severe.

In our previous response we stated that the impact of the proposed development was at the high level of significance in terms of road safety, but that no single road safety issue was considered severe as no significant numbers of crashes had been recorded in the area and hence we could not recommend refusal of these applications based on the 2012 version of the NPPF.

Recent planning appeal decisions¹ have clarified the Planning Inspectorates views on road safety and we have considered these in our response. In summary the Planning Inspectors have viewed each site as unique and that the absence of a history of crashes should be balanced against observed road safety issues when deciding if there is an unacceptable impact on highway safety.

Due to concerns raised by residents during the planning process additional site visits were undertaken involving both driven and walked inspections. I personally visited the area on the morning of the 12th October 2018.

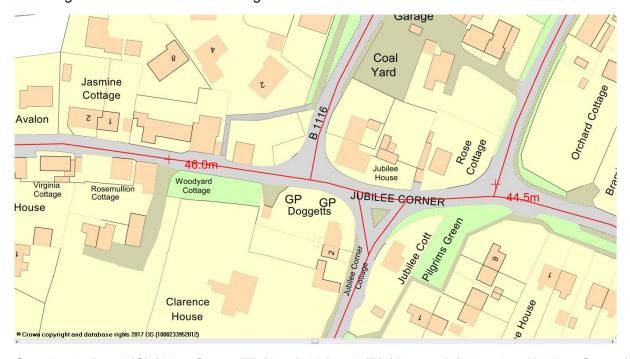
I make the following observations;

General

The layout of the village means that most motorised and non-motorised traffic has to pass through the 'core' of the village represented by the junction of Stradbroke Road / New Street / Laxfield Road / B1116 known as Jubilee Corner as:

- The primary school is located to the south off Stradbroke Road
- The village shop is located to the west on New Street
- The two public houses, Church and Baptist Chapel are located to the north
- The Sports and Social Club to the east off Laxfield Road

Residential developments are generally equally spread around the core which results in trips to much of the village infrastructure will be through the 'core'.



Stradbroke Road (S) / New Street (E) / Laxfield Road (E) / B1116 (N) Junction (Jubilee Corner)

There is a narrow footway on west side of Stradbroke Road leading to New Street. This footway is currently not wide enough for more than one person. It was observed that when used by groups of pedestrians some walked in the road. A driven survey identified an elderly pedestrian walking on the road on the inside of the bend on the B1116. The highway boundary is the fence to the rear of the path and any widening would be into the carriageway.

The island at the junction of Stradbroke Road and the B1116 does not provide a safe crossing point for pedestrians due to the limited visibility. Currently no dropped crossings are provided at this junction. No footway is present on the east side of Stradbroke Road although a verge is available for use by fit pedestrians.

Although vehicle speeds through this area appear low this does not prevent occasional conflict between vehicles. Large vehicles turning south into Stradbroke Road are required to use both lanes so that any northbound vehicle is required to stop. This was observed at the time of the site visit. Several vehicles were also observed turning around in the entrance of New Street, a manoeuvre which requires use of the full width of carriageway in an area without footway. Both manoeuvres increase risks for pedestrians.

Stradbroke Road / Laxfield Road

Access from Laxfield Road to Stradbroke Road is via a narrow concrete footpath across Pilgrims Green which is not public highway. While passible the width of the path does not allow an adult to walk side by side with a child. Two right angle bends plus the narrowness makes access for those with pushchairs, wheelchairs or mobility scooters difficult. The alternative is to use the verge to access Stradbroke Road and cross at the island described above.

New Street

Pedestrians exiting from the footway north of Woodyard Cottage have poor visibility to either side and step straight onto the carriageway. Pedestrian barriers are present to restrain pedestrian but constrain the footway for those with pushchairs, wheelchairs or mobility scooters.

No footways are present on New Street resulting in pedestrians walking in the road. During the site visit a number of pedestrians, some elderly, were observed walking to the local shop. When vehicles approach there was a tendency for pedestrians to step into private driveways when possible. Where parked cars were present pedestrians often must walk into the road around them. When two cars meet one must stop if a pedestrian is in the road and no driveway is present.

Having examined the site, it is difficult to see how significant lengths of footway could be provided without reducing road widths and relocating on street parking. The presence of buildings abutting the road places further limitations as existing thresholds will need to be maintained.

Travel Modes

While not considered a scientific survey, it was noted that in the morning site visit only 3 children accompanied by two adults walked to school from north of Jubilee Corner, but a significant number of school children were in cars travelling through the junction. It is possible that concerns about safety discourage pedestrians particularly in the core of the village.

Conclusion

There are hazards to non-motorised users travelling on New Street or through Jubilee Corner. The layout of the village means that this is the desirable route to reach many services. The proposed developments will result in increased vehicle and pedestrian movements through this core area.

While it is appreciated that all three developers have contributed in finding ways to improve road safety the constraints imposed by the existing highway network severely restrict the practical options. The measures proposed are the best solution available within the existing constrains they fall short of making the highway safe for pedestrians.

While it is noted the few crashes have been recorded in this part of Fressingfield recent planning appeals have determined that weight should be given to observed conflicts between pedestrians and vehicles. It is the Highway Authority's opinion that this is the case on New Street and Jubilee Corner if further development were approved which increased pedestrian and / or vehicle movement through the core of the village without the provision of safe, practical alternatives.

It is the Highway Authorities opinion that further traffic passing along New Street and / or through Jubilee Corner would result in an unacceptable impact on highway safety particularly for vulnerable pedestrians.

For this reason, the Highways Authority recommends that permission is refused for these applications.

Yours sincerely,

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

1: Planning Appeal References APP/D3505/W/18/3197391 Land off Darking Road, Boxford APP/W3520/W/18/3196561 Derry Brook Lane / Little London Hill, Debenham