

**Chapel Road
Grundisburgh**

Transport Assessment Peer Review

EAST SUFFOLK COUNCIL

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1 Executive Summary

- 1.1** Brookbanks is appointed by East Suffolk Council to review the transportation evidence produced to support a residential development on Chapel Road, Grundisburgh. The purpose is to provide an non-bias and independent consideration of the evidence, to identify any shortcomings and to then suggest any additional details that would aid in determining the application.
- 1.2** The principal source of the transport evidence is presented within the transport assessment. The purpose of the transport assessment is to provide the necessary information to enable the local planning authority and highway authority to reach a decision on the acceptability of the development. The level of detail necessary to be provided within the transport assessment is related to the size of development and the nature of the application.
- 1.3** The planning application is a Full application, which will limit the need to submit reserved matters applications. On that basis, the level of detail should be pursuant to a full application.
- 1.4** The size of the development has been reduced from 80 to 70 units. The development quantum immediately suggests a low level of impact. However, the transport assessment will still need to include sufficient details to demonstrate the development will have a low level of impact.
- 1.5** Irrespective of the size of development, it would be expected the transport assessment to include as a minimum the following level of detail:
 - Demonstrate the development is policy compliant, rather than simply repeating relevant planning policy
 - Undertake a review of walking, cycling and public transport networks, to identify both positive and negative elements. This will facilitate the identification of walking, cycling, public transport movement strategies that will enable development
 - Undertake a thorough review of recent road accidents, to demonstrate that road safety is not a material consideration,
 - Provide traffic flows within the sensitive roads adjacent to the development, to demonstrate the development will not result in a severe impact
 - Provide a review of the operation of the site access and over sensitive locations, in order to confirm the development will not result in a severe impact
 - Provide refuge vehicle swept paths, to demonstrate that it is physically possible to service the development (being important for a full application)
 - Provide speed surveys at all relevant junctions, in order to confirm the design criteria that should be applied
 - Provide detailed drawings of all the relevant junctions, to either confirm design compliance to the relevant standards or to highlight departures from standard that can then be considered
 - Provide road safety audits to cover all highway interventions, to demonstrate the acceptability of the design
- 1.6** The information identified above is not requested in order to find fault, to then justify an objection to the development. The information has been requested to allow an informed judgement to be made. Only when all the necessary facts have been presented, can a 'sound' judgement be made. A departure from standard or lack of cycling facilities, would not automatically result in an objection, if a comprehensive consideration of the local environs was presented.

- 1.7 The final judgement is a balancing act, between the level of provision against likely impact. The purpose of this note is not to justify an objection, but to identify what other information would be helpful to enable East Suffolk Council to make an informed decision.
- 1.8 The Peer Review has identified nineteen areas where additional information would be useful. These have been categorised as:
- **Essential:** Being components of the current Transport Assessment that are either missing or incorrect and are deemed necessary in order to determine a full planning application.
 - **Desirable:** Being components which would be ideal to have awareness/knowledge of prior to determination but are not deemed essential.
 - **Moderately Beneficial:** Being components which would help to provide a more comprehensive and considered appreciation of the site and it's traffic impacts, but are not formally required or expected.
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2 Introduction

- 2.1** Brookbanks is appointed by East Suffolk Council (ESC) to review the transportation evidence produced to support a residential development on Chapel Road, Grundisburgh.
- 2.2** The planning application (DC/20/3284/FUL) seeks approval for the erection of 70 dwellings, including affordable dwellings, together with public open space, roads, accesses, parking, garages, drainage and associated infrastructure.
- 2.3** At the associated planning committee, it was agreed to defer the application to seek independent highway advice. The Highway Authority, Suffolk County Council (SCC), offered no objection. There has been strong local objections citing highways grounds.
- 2.4** The purpose of this report is to provide a comprehensive review of the highways and access proposals for the application. This review has included:
 - A site visit to review the site, local highway and public right of way network.
 - Consideration of the application submission in respect of all highway and public right of way proposals for access, connectivity, sustainable transport, traffic and highway.
 - Consider the deliverability and the soundness of the applicant's proposal.
 - Have regard to the Local Plan allocation and policies as the adopted development plan. Consideration will also be based on the NPPF and relevant Highways technical guidance.
 - Review and consider the application response from the Parish Council and other objectors.
 - Consider the responses from the County Highway Authority as the statutory consultee for determination of the application in respect of transport matters and consider the soundness of their response and recommended mitigation, obligations and conditions.
- 2.5** The remainder of the report is structured in the following way:
 - Chapter 2: Provides a short summary of the site and indicates the broad location of the site.
 - Chapter 3: This chapter reviews the Transport Assessment (TA) that was produced to support the initial planning application. This chapter is structured to mirror the chapter headings of the TA, summarising the information provided. Following the review of each chapter, the text highlighted in blue identify those areas that would benefit from further consideration.
 - Chapter 4: This chapter reviews any additional documentation associated with the planning application. Following the review of the additional documents, the text highlighted in blue identify those areas that would benefit from further consideration.
 - Chapter 5: this provides a summary of the areas that would benefit from further consideration.

3 Background

- 3.1** An initial Transport Assessment (document reference: CCE/ZA461/TA-02) was produced by Cannon Consulting Engineers (CCE) on behalf the Applicant, Hopkins Homes Ltd (HHL), in support of the planning application dated August 2020. At that time, the proposals comprised:

Full Application for erection of 80 dwellings, including affordable dwellings, together with public open space, roads, accesses, parking, garages, drainage and associated infrastructure.

- 3.2** The Application Site is located to the south of the centre of Grundisburgh, circa 5km west of Woodbridge and 10km east of Ipswich. The site is bound by Park Road to the south, Chapel Road to the east and the Recreation Ground to the west. The Public Right of Way (PROW) FP20, runs along the northern boundary of the site.
- 3.3** The location of the Application Site is indicated below.

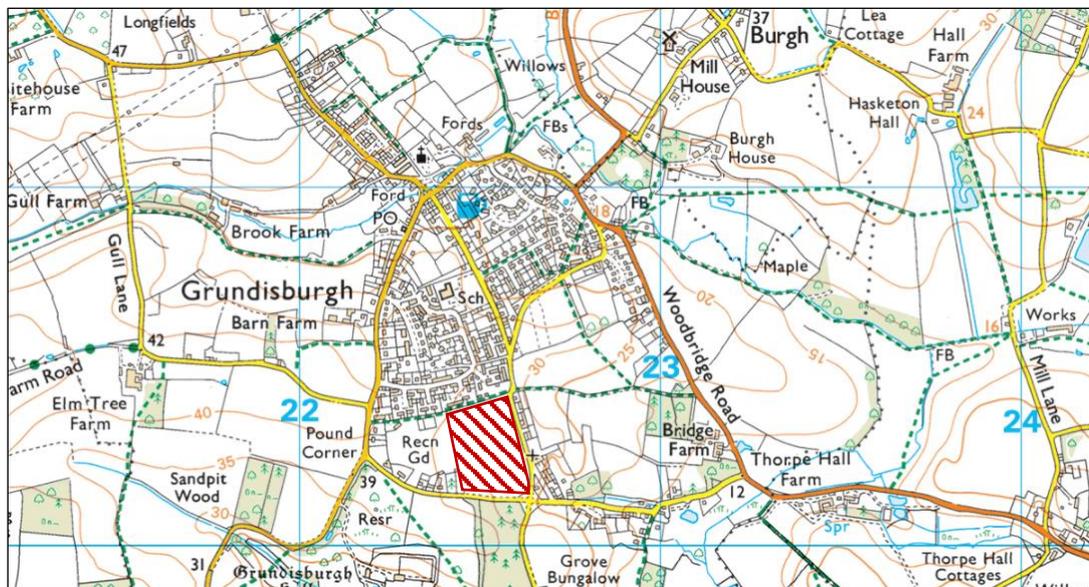


Figure 3-1: Application Site Location

- 3.4** In response to comments from statutory consultees to the application, the Applicant submitted revised proposals to reduce the number of dwellings from 80 to 70 and provided details of proposed improvements to the Public Right of Way (PROW) to the north of the site. These proposals were discussed in a transport assessment addendum (document reference: CCE/ZA461/TN-02) in February 2021.

4 Transport Assessment – August 2020

Chapter One: Introduction

4.1 The introduction to the transport assessment, confirms that at the time of the production of the document, the planning application sought the approval for 80 dwellings. This chapter confirms that the Application Site was identified in the Suffolk Coastal Local Plan (SCLP) - Final Draft as “Land west of Chapel Road, Grundisburgh” (reference SCPL12.52) for circa 70 residential dwellings.

4.2 Therefore, this demonstrates the planning application seeking approval for 80 dwellings was not compliant with the local plan.

4.3 The introduction provided details on the response from SCC, regarding the Application Site, in relation to the draft local plan:

In order to secure safe and suitable pedestrian access to the highway network, a way of connecting into the existing pedestrian network will need to be secured, perhaps by improving the existing footpath 20 and the link north, on to Post Mill Gardens in order to provide access to the primary school and bus stops on Ipswich Road.

4.4 As part of the production and examination of the SCLP, a Statement of Common Ground (SoCG) was reached between ESC, HHL and SCC regarding Policy SCLP12.52 (the Application Site) to allow the extension of the site boundary within the SCLP to the south to facilitate access onto Park Road (instead of Chapel Road). A copy of the SoCG is contained in Appendix A of the TA.

4.5 The SOCG confirmed that a suitable access arrangement can be achieved with passing places on Chapel Road and the widening of Park Road. This report does not review the process of reaching carried out over the local plan process where the Inspector found the Local Plan and its allocation policies sound.

4.6 Pre-application scoping discussions were undertaken with SCC ahead of the Transport Consultant producing the supporting information for a planning application on transport matters. The following summarises what was agreed.

- Vehicular access to be taken from Park Road as per the agreed SoCG.
- Localised carriageway widening on Park Road between the site access and the junction with Ipswich Road.
- A vehicular passing place is required on Chapel Lane.
- A pedestrian connection to the existing PROW to the north of the site is essential to the acceptability of the site.
- The vehicle trip generation should be calculated using SCC “rural trip rates”, supplied by SCC.
- It was agreed that off-site capacity modelling would not be required.
- The proposals should consider local safety improvements at the junction of Ipswich Road/Park Road and Lower Road/Grundisburgh Road (B1079).

4.7 **It is noted that no evidence was presented within the TA to demonstrate SCC agreement to the above. As part of the Peer Review, emails between CCE and SCC have reviewed, this confirmed that SCC felt it was unnecessary to produce a TA.**

4.8 **Ministry of Housing, Communities & Local Government advice suggests that Transport Assessments are thorough assessments of the transport implications of development, and Transport Statements are a**

'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (ie in the case of developments with anticipated limited transport impacts).

- 4.9 Policy SCLP7.1 identifies indicative thresholds for the production of transport statements and transport assessments. The Policy identifies that a transport statement will be required for developments of 50 to 80 dwellings and a transport assessment is required for developments of over 80 dwellings.
- 4.10 A TA was produced and the document should reflect the nature / type of assessment required.

Chapter 2: Existing Conditions

- 4.11 This chapter of the report outlines the existing local conditions, including the provision for walking, cycling, public transport and the local highway network in the vicinity of the site. Connectivity to local amenities and facilities is also reviewed.

Local road network

- 4.12 Park Road run east-west to the south of Grundisburgh. It is a rural road serving eight residential properties. There is no street lighting and the road is signed as unsuitable for HGV traffic.
- 4.13 Park Road meets Ipswich Road at a priority T junction. Ipswich Road is subject to 30mph and 60mph speed limit to the north and south respectively.
- 4.14 To the south-east of the site Park Road forms a crossroads with Lower Road and Chapel Road. Chapel Road to the north provides a direct route into the centre of Grundisburgh. Lower Road is a narrow, rural carriageway providing access to a number of properties.

Walking and cycling

- 4.15 The TA identified that along the northern boundary of the Application Site there is a Public Right of Way (PROW), FP20. The PROW is unsurfaced and undefined. There is a hedge/fence line on the northern side of the PROW but there is no border or boundary on the southern side of the footpath.
- 4.16 Within this chapter, Table 2.2 presents distances to various local amenities.
- 4.17 **These distances have been checked and they cannot be verified. The route followed should be confirmed. The distances should be measured from an identifiable dwelling.**
- 4.18 **No consideration has been given within the TA towards safe routes to schools, with access to the primary school (circa 900m to the north) predicated on FP20.**
- 4.19 **The TA, in this section of the report, does not identify that Park Road and Chapel Road does not have any footways.**

Bus Services

- 4.20 The TA indicates that there is a local bus service operating along Ipswich Road to the west of the site. This can be accessed from the bus stops adjacent and opposite Park Road which are served by a shelter on the eastern side of the carriageway,
- 4.21 On average these services provide a service every two hours Monday-Saturday. The journey on the 70/70A service to Woodbridge takes approximately 40 minutes, where the first bus is at 08:56 and the
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last bus at 18:20. The journey on the 70/70A service to Ipswich takes approximately 20 minutes where the first bus is at 07:50 and the last bus at 17:16.

Rail Services

4.22 The closest Railway Station is located in Woodbridge, approximately 6.5km southeast of the site.

Personal Injury Accident Review

4.23 An analysis has been undertaken of Personal Injury Accident (PIA) data for the 5-year period between 01/09/2014 – 01/09/2019.

4.24 **The time period is outdated and does not include any accidents that would have occurred recently.**

Traffic flow data summary

4.25 An Automated Traffic Counts (ATC) survey was undertaken for a 7 day period from 19/01/2020. The ATC was located approximately 70m east of the Pine Grove/Lower Road junction, to gather information of traffic volume and speed. This data was collected before lockdown measures were implemented in response to COVID-19.

4.26 **January is not considered a neutral month in relation to typical travel patterns / habits, as indicated within the guidance provided by the DfT, Transport Analysis Guidance (TAG), which provides information on the role of transport modelling and appraisal. Therefore, the traffic flows are not considered representative.**

4.27 Further ATCs were carried out at the following locations for a 7 days period from 09/06/2020:-

- Ipswich Road, either side of the junction with Park Road
- Grundisburgh Road, either side of the junction with Lower Road.

4.28 **These were carried out when COVID-19 travel restrictions were in operation and therefore not representative, as highlighted in the TA.**

4.29 **Limited traffic data was presented for the local roads, to indicate traffic levels, data provided only for Lower Road.**

Current Travel Patterns

4.30 The 2011 Census data for journey to work has been reviewed within the TA to get an understanding of where current residents of the Grundisburgh area are travelling to work.

Chapter 3: Review of Current Land Use and Transport Planning Policy

4.31 This section of the report considers the transport policy background against which the planning application will be assessed. This includes National and Local Policy. The main policy documents setting the context within which the assessment will be undertaken are:

- National Planning Policy Framework (February 2019)
 - Planning Practice Guidance (2014)
 - Suffolk County Council Local Transport Plan 2011-2031
 - Suffolk County Council Parking Standards (November 2009, updated May 2019)
-

- Suffolk Coastal District Local Plan (Core Strategy & Development Management Policies July 2013)
- Suffolk Coastal Local Plan (Draft 2018-2036)

4.32 Some of Policy documentation is out of date and needs to be reconsidered. This chapter repeats policy statements without making any attempt to identify policy compliance.

Chapter 4: Development Proposals and Transport Strategy

Proposed Access Arrangements

- 4.33** It is proposed to access the site from Park Road, as shown on Drawing 1812-293-278 General Arrangement. The site access arrangement comprises a priority T junction including:
- 2.4m x 59m visibility splays in accordance with SCC guidance for visibility splays on C and U class roads.
 - 5.5m wide carriageway
 - Footway provision on the western side of the carriageway

4.34 The design of the junction is based on SCC guidance. However, no information has been provided to confirm the 85th percentile speeds at the location of the site access. Therefore, the design cannot be approved until the 85th percentile speeds are identified.

4.35 The footway provision stops at Park Road suggesting pedestrians will then have to walk in the road or within another route through the site to travel east or west, although the majority of the local facilities are located to the north, accessed via FP20. A road safety audit has not been provided. On this basis, it is considered that the access arrangements should be considered further.

Pedestrian & Cycling

4.36 The TA suggests that the site access will accommodate all modes. However, the TA states:

Pedestrian connections will therefore be provided to the north of the site with links to the existing PROW FP20 which runs from Chapel Road (to the east) along the northern boundary of the site, and through the recreation Ground (to the west). This will cater for the majority of pedestrian movements from the site to typical destinations in the village.

4.37 The TA does not include any infrastructure schemes to encourage cycling, appearing to disregard this mode of travel.

Servicing

4.38 The TA advises that the design and layout will adhere to the guidance set in MfS. The access point has been designed to accommodate a refuse vehicle with turning heads for refuse vehicles to circulate the site.

4.39 The report does not include any evidence, for example vehicle swept path analysis, to corroborate the suggestion that service vehicles can safely negotiate the development.

Off-site Highway Improvements

4.40 The TA confirms that Park Road will be widened to achieve a width of 4.8m from the junction with Chapel Road/Lower Road (to the east) and the junction with Ipswich Road (to the west).

- 4.41 In addition, a vehicle passing bay is proposed on Chapel Road.
- 4.42 **The provision of a passing bay acknowledges the road width along Chapel Road is substandard. The length of Chapel Road is in excess of 300m and it is considered that a solitary passing bay is insufficient. The passing bay is located circa 200m to the south of bend in the road along Chapel Road, which is likely to result in oncoming vehicles still needing vehicles to negotiate past each other.**
- 4.43 As indicated earlier, 85th percentile speeds have not been provided at the site entrance, however a drawing is provided that indicates the visibility splay at the Ipswich Road/ Park Road junction. The TA states that
- The existing achievable visibility splay from the junction. 2.4 x 90m can be achieved to the north. 2.4 x 40m can be achieved to the south. This is below the 2.4 x 90m required in accordance with the speed limit the recorded 85th percentile speed.*
- 4.44 **This demonstrates that the junction is not compliant to the relevant design standards.**
- 4.45 The TA also discusses the Lower Road/ Grundisburgh Road (B1079) junction, confirming the visibility splays have been based on a 2.4m set back, the visibility splays have been measured to the centre of the road and suggesting a traffic calming scheme will need to be implemented.
- 4.46 **The visibility splays are therefore contrary to DMRB, Figure 3.4 CD 123 Geometric design of at-grade priority and signal-controlled junctions. This identifies that the visibility splays should be drawn to the edge of the carriage way and not to the centre of the road, which artificially increases the measured distance.**

Chapter 5: Trip Generation, Distribution and Impact

- 4.47 This chapter presents information regarding the total trip generation which is based on trip rates provided by SCC and also provides information regarding the distribution based on travel to work statistics.
- 4.48 **The trip rates were provided by SCC, although the report does not contain evidence to support this. The distribution has been checked and is considered appropriate. The chapter title suggests impact is considered, which is not the case.**

Chapter 6: Local Highway Impact Appraisal

- 4.49 The chapter largely considers the impact on Lower Road and references local concern regarding HGVs attempting to use Lower Road.
- 4.50 The report identifies that a Residential Travel Information Packs (RTIPs) will be provided to each household upon first occupation. The RTIP would include the following: -
- Local Area - map to show local amenities and travelling distance.
 - Cycling and walking
 - Local Facilities and Amenities
 - Bus Travel
 - Rail Travel
 - Car Sharing
 - Other ways to get around
 - Useful Contacts
-

4.51 The report does not include any qualitative assessment of the road network so it cannot be confirmed if the development will not result in a severe impact. Furthermore, the RTIP does not contain any measures to encourage modal shift.

Summary of TA

4.52 The TA has been reviewed on its own merit. It is considered that there are areas of the that would benefit from additional consideration.

- It is noted that no evidence was presented within the TA to demonstrate SCC agreement to the assessment methodology
 - The distances between the site and local amenities cannot be verified. The route followed should be confirmed.
 - No consideration has been given towards safe routes to schools.
 - The TA does not identify that Park Road and Chapel Road does not have any footways.
 - No improvement to bus services has been recommended.
 - The accident data is outdated.
 - January is not considered a neutral month and as such the traffic flows are not considered representative.
 - Surveys were carried out when COVID-19 travel restrictions were in operation and therefore not representative.
 - No traffic data was presented for any local roads to indicate traffic levels.
 - Some of Policy documentation is out of date and there is no attempt to identify policy compliance.
 - No information has been provided to confirm the 85th percentile speeds at the location of the site access. Therefore, the design cannot be approved.
 - A road safety audit has not been provided and on this basis, it is considered that the access arrangements should be considered further.
 - That TA does not include any infrastructure schemes to encourage cycling.
 - The report does not include any evidence to corroborate the suggestion that service vehicles can safely negotiate the development.
 - The provision of a single passing bay is insufficient.
 - The visibility splays need further clarification.
 - Details of the traffic calming scheme have not been provided.
 - The report does not include any qualitative assessment of the road network.
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5 Additional Evidence

SCC Response to Application - October 2020

Highway Comments

- 5.1 The SCC response identifies that this location was assessed for approximately 70 dwellings during the Local Plan allocation process, resulting in the allocation of site SCLP12.51. The principle of development was only deemed acceptable for 70 dwellings by the Highway Authority subject to a number of measures including provision of a metalled pedestrian route from the development to the village amenities, widening of Park Road in order to achieve two traffic flow from the site access to the wider road network, improvements to Chapel Road and local junctions, and a suitably surfaced pedestrian route within the site to remove the need for pedestrians to walk on Chapel Road and the length of Park Road that the site fronts. Furthermore, it was established that a right exists for the developer to surface an existing Public Right of Way via a Section 278 Agreement.
- 5.2 The response confirms that the above assessment was made for 70 dwellings rather than the 80 proposed in the original application. Subsequently, SCC objected to the submitted proposal on this basis as it provides a greater impact on the highway network than can be mitigated.
- 5.3 **The SCC objection to the increase in flows is noted. However, the TA does not provide information relating to traffic levels without this information, this development could prejudice the quiet lane process.**
- 5.4 The response highlighted that the submitted layout plans are not acceptable to the Highway Authority because they do not provide the necessary pedestrian connectivity. The key to the acceptance of this site location was the provision of a metalled pedestrian route from the development to the existing village footway network. It was identified that Footpath 20, that runs along
- 5.5 **Comments relate to pedestrian connectivity, there is a lack of consideration regarding cyclists.**

SCC Travel Plan Officer Comments

- 5.6 The response suggests that the development being too small to justify a Travel Plan in accordance with national planning guidance.
- 5.7 **The development is such a size that a travel plan would not be expected. However, it might be advantageous to include a scheme to encourage mode shift, to minimise the potential increases in traffic. For example, two three month bus tickets per household.**

SCC Public Rights of Way Team Comments

- 5.8 This highlights agreement to the principle of the FP20 route being surfaced to enable pedestrian access. In order to do the legal work to widen FP20 to at least 1.5m all the way along we would need £9,000 under a s106 agreement. That assumes that the developer will deal with surfacing the route under a s278 agreement.
- 5.9 **This provides pedestrian access but not cyclists. This response highlights the need for 1.5m on the entirety, £9,000 under a s106 agreement and with surfacing the route under a s278 agreement. The development is predicated on this route.**

SCC Passenger Transport Team

- 5.10** The response identifies the need to provide a hardstanding area opposite and refurbish the existing brick shelter and to include bus stops at the Village Hall. Therefore, requiring a s106 element for £20,000. Furthermore, a request for a contribution of £100,000 to enable to improve the frequency.
- 5.11** *These suggestions will improve the attractiveness of public transport which will encourage mode shift and should be supported.*

Transport Assessment Addendum – February 2021

- 5.12** A transport assessment addendum has been produced in response to the reduction of dwellings on the site from 80 to 70. This report does not provide any additional evidence.
- 5.13** *The suggestions made in relation to the TA and the additional information remain outstanding.*

Grundisburgh & Culpho Parish Council's Response – March 2021

- 5.14** In response to the planning applications, Grundisburgh and Culpho Parish Councils produced a note to outline their objections.
- 5.15** The preamble to the note makes reference to a Housing Update Statement, made by the Rt Hon Robert Jenrick, Secretary of State for the Ministry of Housing, Communities and Local Government. An extract was included:
- "There is widespread support for ensuring enough homes are built across England to ensure the needs of our communities are met. We heard clearly through the consultation that the building of these homes should not come at the expense of harming our precious green spaces."
- 5.16** *This statement does not suggest that developments in rural areas should not be allowed, more that the local environment should not be compromised. Suggesting perhaps the development quantum is not in keeping with the local area.*

Public Interest

- 5.17** This section highlights the volume and tone of responses to this development and to illustrate this point, provides an excerpt from planning refusal E/8779 from 1964 [Proposed residential development opposite the Baptist Chapel, Grundisburgh]:
- "The development would appear as an intrusion on to open land away from the main part of the village. There are also road safety objections in that the roads adjoining and near the site are narrow, the junctions are unsatisfactory and the levels of the land give rise to additional difficulties."
- 5.18** *This again suggest that the development quantum is not in keeping with the local area.*

Highway Access and Safety

- 5.19** The note identifies that the applications does not address the current or resulting highway conditions along Lower Road and Park Road. It is highlighted that these routes are currently in the process of being designated 'Quiet Lanes'. The note acknowledges that highway improvements are proposed along Park
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Road. These do not provide any provisions for pedestrians in the form of footways, level verges or other refuges.

5.20 The note provides two additional planning references.

Planning refusal C8815 [Use of land for the erection of one dwelling, Lower Rd Grundisburgh] 1986: “The proposal is not in the interests of highway safety, being approached along a fairly narrow road, close to a completely blind double bend and without footways or level verges.” - Director of Planning Services, District Council

Planning refusal C6126 [Residential development on land off Meeting Lane] 1981: “The proposal is premature pending the improvement of Meeting Lane, which is a narrow unclassified road which in its present form does not represent a satisfactory means of access for additional development.”

5.21 This identifies that the proposal for development has been considered and refused. This suggests that the development quantum is not in keeping with the local area and additional mitigation might need to be considered. The development cannot be accessed from the north via cycling, relying on the ‘quiet roads’ to the south. But no assessment of the traffic levels along these roads has not been provided.

5.22 Within Appendix A of note reference is made to the Suffolk Design Guide, which stipulates road widths where no direct access to dwellings: -

- Between 50 and 300 dwellings – 5.5 metres;
- Between 25 and 50 dwellings – 4.8 metres;
- Up to 25 dwellings – 4.1 metres.

5.23 The guidance relates to the provision of new roads, rather than an assessment tool for existing roads, however, this suggests there is a dis-connect between the designation of quiet lanes, the development quantum and projected traffic volumes in the local road network.

Pedestrian Access to Village Services

5.24 The note identifies the reliance on FP20 and questions the deliverability.

5.25 The development access is predicated on the delivery of the improvement to FP20. On that basis, the improvement works should be conditioned such that the no occupation should occur prior to the completion of the works. Consideration should be given in relation to conversion of the footpath into a bridleway to provide cycling access.

Brief from the community

5.26 This document summarises the combined input from a number of Grundisburgh residents who object to the proposed development in its present form and wish to see an independent transport assessment conducted before any decision is reached by the Planning Committee. A list of 13 items was identified, which are summarised below.

- The safety and suitability of the identified highway interventions and the availability of highway land
 - The usefulness of the proposed passing place on Chapel Road
 - The safety and suitability of walking routes specified in the Habitats Regulation Assessment, including Ipswich Road, Park Road and Lower Road.
 - The reliance on a section 278 Highway Agreement to provide footpath improvements
 - The safety and suitability of FP20 as the pedestrian access to the development
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- The lack of footway on Park Road / Lower Road
- Whether the lack of cycling provisions accords with local and national planning policy.

5.27 These points have also been identified through this Peer Review.

SCC Response to Application - April 2021

- 5.28** This response provides a list of conditions that should be attached to the consent. Those that may benefit from further consideration are discussed.
- 5.29** Condition: No part of the development shall be commenced until details of the proposed surfacing improvements and links to Footpath 20 as indicatively shown on Drawing Nos. 1812-296 305 Rev C and GRU5 003 Rev F have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to occupation.
- 5.30 This does not respond to the need for a 1.5m wide path nor provide access rights for cyclists.**
- 5.31** Condition: No part of the development shall be commenced until details of the proposed road widening of Park Road, local junction improvements and Chapel Road passing place indicatively shown on Drawing Nos. 1812-296 279 Rev B; 1812-296 008 Rev A and; 1812-296 009 have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to occupation.
- 5.32 The Chapel Road single passing place may be insufficient.**
- 5.33** Condition: The areas to be provided for storage of Refuse/Recycling bins as shown on drawing number GRU5 002 Rev G shall be provided in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.
- 5.34 No evidence has been presented that a refuse vehicle can safely negotiate the development.**
- 5.35** Condition: The new estate road junction(s) with Park Road inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials.
- 5.36 The design speed of all the roads have not been provided and the extent of the visibility splays need to be confirmed.**
- 5.37** Condition: Before the access onto Park Road is first used visibility splays shall be provided as shown on Drawing No. 1812-296 278 Rev A with an X dimension of 2.4m and a Y dimension of 59m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.
- 5.38 The design speed of all the roads have not been provided and the extent of the visibility splays need to be confirmed.**
- 5.39** Condition: Before the access onto Chapel Road is first used visibility splays shall be provided as shown on Drawing No. 1812-296 295 with an X dimension of 2.4m and a Y dimension of 59m and 52.8m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.
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- 5.40 The design speed of all the roads have not been provided and the extent of the visibility splays need to be confirmed.

Hopkins Homes Planning Committee Briefing Note – July 2021

- 5.41 A briefing note was prepared in July 2021 to set out Hopkins Homes position with respect to a number of highway related matters that were discussed at the East Suffolk Council's Planning Committee South on 29th June 2021.

Footpath FP20

- 5.42 Sections of FP20 run through 3rd party / unregistered land. The briefing note suggests that this does not affect the deliverability of the footpath improvements as a right exists to improve FP20 via a Section 278 Agreement. SCC has requested that the Applicant enter into a legal agreement under which the LHA can authorise a developer to carry out works on an existing public right of way.
- 5.43 The legibility of the development is predicated on the improvement of FP20, it would be beneficial that these works are conditioned such that no houses can be occupied until these works have been completed
- 5.44 A 1.5m wide surfaced footpath is deliverable along the length of FP20 with the exception of the first 14m from Chapel Lane which is limited to 1.2m.
- 5.45 it should be demonstrated that a safe route to the primary school can be delivered.
- 5.46 The briefing note highlights that FP20 will not be street lit. The note confirms that the footpath will be overlooked by the development for only half its length.
- 5.47 The footpath will be the only pedestrian link between the site and the wider area and will be used by a range of different users that will have individual needs. This includes access to the primary school. The Applicant confirmed that there will be areas of the footpath that will be raised.
- 5.48 It is considered that a comprehensive review of the design off the FP20 should be undertaken to ensure the needs of the future users off the footpath are fully addressed as part of the pre-commencement condition process.
- 5.49 The briefing note confirms that cyclists will need to use the local highway network.
- 5.50 The use of the highway for confident cyclists could be considered acceptable. However, there may be cyclists where travelling on the highway would not be attractive and could dissuade users. Consideration should be given two converting the footpath into a bridleway. Again, if necessary this could be a planning condition to secure the conversion prior to occupation of any dwelling.

Traffic Impact

- 5.51 The briefing note discusses the potential traffic impact on local roads but does not provide any quantifiable traffic count data.
- 5.52 Without an understanding of the existing traffic flows, it cannot be determined that the development will not result in a severe impact.
- 5.53 The briefing note confirm that a financial contribution of £72,300 and £100,000 will also be secured through the S106 to fund school transport and the provision of a new bus service for Grundisburgh respectively.

- 5.54 It is recommended that details of the new bus service, indicating times of operation and frequency, should be confirmed to identify what the contribution will secure. As an alternative, this level of service can be conditioned to ensure adequate public transport services are provided.

Discussions between Applicant and SCC

- 5.55 As part of the peer review process, the Applicant was requested to provide communication with SCC that related to the scoping discussions. Email exchanges between SCC and CCE were provided. The following are excerpts from the emails provided:

CCE email to SCC 12TH March 2020

“In terms of off-site highway impact and modelling, we hadn’t intended to undertake any junction modelling due to the relative small scale of the proposals. Is there a junction in particular you would like us to assess? If so, I will get the counts carried out ASAP. We have got ATC data for Lower Road as we knew this was of concern locally.”

SCC email to CCE 12th March 2020

“I have consulted colleagues on the need for a TA and we do not require one for this site as the impact on junctions where we are aware of congestion is very likely to be minimal, even with higher trip rates.

However, the impact on the roads and junctions immediately to the south of the site, notably Lower Road and its junction with the B1079, and Park Road junction with the C323 Ipswich Rd and the crossroads between them are likely to come under scrutiny as the impact on those roads and junctions is fairly significant, given the existing very low flows and very narrow nature of Lower Road. Accepted it is unlikely that passing places can be provided on Lower Road, due to the lack of highway verge, but I would strongly recommend either ensuring the visibility splays at the junctions are adequate, or improving them if not.”

CCE email to SCC 12TH March 2020

We are going to collect ATC data for Chapel Lane, Park Road and Ipswich Road as we know impact it is likely be contentious.

We will have a look at visibility at each of the junctions and if there are any improvements that can be made

- 5.56 The initial response from SCC suggests that a TA is not required. However, they continue to advise that the impact on Lower Road and its junction with the B1079, and Park Road junction with the C323 Ipswich Road and the crossroads between them is fairly significant. Furthermore, the SCC strongly recommend ensuring the visibility splays at the junctions are adequate, or improving them if not.
- 5.57 ESC provides a list of documents that is necessary to validate planning applications. in relation to TA, the validation list identifies that a transport statement or assessment is required to validate an application on all developments that are likely to generate significant levels of movements to and from the site.
- 5.58 The response from SCC suggest that the impact of the development could be fairly significant, suggesting a TA is required. As indicated earlier, the TA does not assess the identified locations. The TA does consider the visibilities splays, but these should be drawn in accordance with the relevant design standards.

6 Summary

- 6.1** The purpose of this technical assessment is to review the transport evidence submitted in support of the planning application that seeks the approval for 70 dwellings.
- 6.2** It is considered that there is insufficient information provided to confirm that development will not result in a severe impact. Furthermore, the development does not provide any facilities to encourage cycling, relying on the quiet lanes to the south. This in itself is contrary to the access strategy that increases vehicles along the identified lanes.
- 6.3** A summary of the additional information that would be helpful in order to identify the development will not result in a severe impact is listed below. These have been categorised as **Essential**, **Desirable** or **Moderately Beneficial**.
- 6.4** **ACTION 1: provide traffic flow data for the roads adjacent to the development in order to identify the potential impact. it is considered appropriate to include the following scenarios:**
- Base year, taking into COVID-19 impacts
 - Future year, to assume background growth in compliance with NTEM
 - future year plus development
- 6.5** **ACTION 2: present evidence of the 85th percentile of vehicle speeds at the site access.**
- 6.6** **ACTION 3: since the application is not an outline, provide stage two road safety audits for all highway improvement works.**
- 6.7** **ACTION 4: evidence should be provided to demonstrate that a refuge vehicle can safely negotiate the development and also enter and leave the development using a forward gear.**
- 6.8** **ACTION 5: provide visibility splays in compliance to design standards.**
- 6.9** **ACTION 6: An assessment should be carried out to demonstrate a safe route to the primary school can be delivered for both pedestrians and cyclists.**
- 6.10** **ACTION 7: A walking and cycling assessment should be carried out to identify if there were any gaps in provision that would create a barrier for safe movement.**
- 6.11** **ACTION 8: the accident review should be repeated to ensure there have been no additional accidents recently.**
- 6.12** **ACTION 9: the applicant is requested to consider the conversion of the footpath into a bridleway or confirm the street furniture necessary to protect pedestrians along the footpath.**
- 6.13** **ACTION 10; The provision of an additional passing bay along Chapel Road.**
- 6.1** **ACTION 11: FP20 should be widened to 1.5m on the entirety.**
- 6.2** **ACTION 12: include £9,000 under a s106 agreement for SCC legal costs in relation to the footpath.**
- 6.3** **ACTION 13: consideration to be given towards the provision of 2 three month bus passes for every dwelling.**
- 6.4** **ACTION 14: if that development relies on reduce speeds to achieve the necessary visibility splays, scheme drawings of any traffic calming measures should be submitted together with stage two road safety audits.**

- 6.5 ACTION 15: the parameters of 'quiet lanes' should be confirmed to ensure the development does not prejudice the application.
 - 6.6 ACTION 16: consider the development quantum, against the impact likely to result within the local road network together with the parameters for quiet lanes.
 - 6.7 ACTION 17; provide detailed plans of the distances between the site and the local facilities that are presented in table 2.2. This should be based on the latest layout of the development with the distances measured from the property furthest away from the local facility.
 - 6.8 ACTION 18: update policy section and provide evidence of compliance.
 - 6.9 ACTION 19; if the footpath is not going to be converted into a bridleway, the applicant should submit details on safe routes the cyclists between the site and all local facilities identified within table 2.2 of the TA.
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