

Your Ref:DC/19/02090
Our Ref: SCC/CON/1784/19
Date: 7 January 2020



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
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IP1 2BX

For the attention of: Vincent Pearce

Dear Vincent,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/19/02090

PROPOSAL: Outline Planning Application (some matters reserved) - Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

LOCATION: Land East Of Ixworth Road, Thurston

Notice is hereby given that the County Council as Highway Authority make the following comments:

1. Background Information

Following the receipt of five major planning applications for Thurston received in 2017 totalling 827 dwellings, SCC and BMSDC commissioned AECOM to provide a cumulative impact assessment to determine any mitigation required due to the additional traffic generated from the sites. The assessment used the peak hours 8.00 to 9.00 and 17.00 to 18.00hrs (derived from traffic survey evidence). Junctions were modelled to calculate the capacity and queue lengths for future years with the developments and required mitigation measures regarding capacity are:

- Introduction of Traffic signals at A143 Bury Road/Thurston Road junction (locally known as Bunbury Arms Junction) with introduction of 30mph speed limit on commencement of works.
- Change in priorities on C692/C693 Thurston Roads (known as Fishwicks Corner) and introduction of a 40mph speed limit at the junction.

Other mitigation measures requested where safety was a consideration are:

- Improvements to footway network within the village
- Contributions to pedestrian crossings at key junctions and locations
- Extension of 30mph speed limits on Ixworth Road, Barton Road and Norton Road.
- Improvements to the PROW footpath network; contribution of £126,500

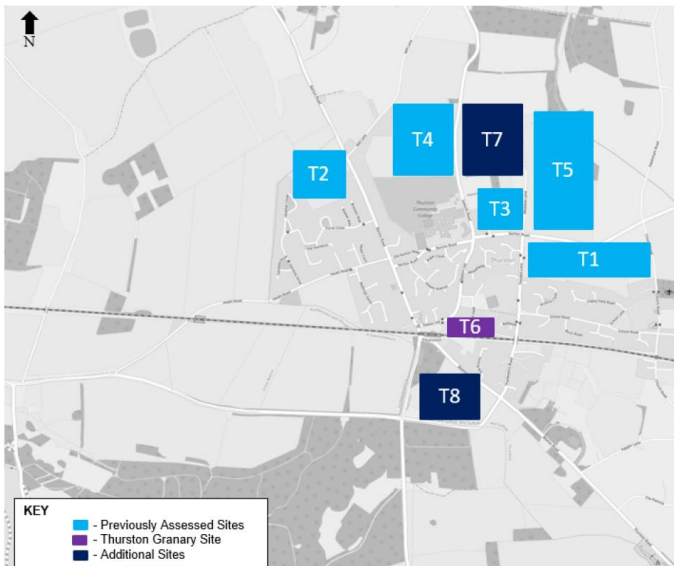
In our 2017 response we identified constraints at Bunbury Arms Junction, Fishwicks Corner, Pokeriage Corner and Barton Road under the Rail Bridge which needed to be addressed by any future

developer. Each location will need to be improved with regard to capacity and safety and we highlighted that future mitigation was limited by the restricted land available within highway boundary.

2. Highway Assessment of 2019 Applications

In 2019 a further 2 major applications for Thurston were received proposing upto 420 dwellings (210 for each site) bringing the total of 1247 dwellings for 7 sites. AECOM were commissioned by SCC to update the report on the cumulative impact from the 5 original sites (plus The Granary site) to include the 2 new sites for future year 2024. TEMPRO was used to derive the local growth factors for the area. The trip generation applied were those set out in the 2017 transport assessment 0.67 (two-way traffic) giving additional 846 trips in the AM peak and 832 trips in the PM peak from all 7 developments.

The indicative locations of all the development sites and the junctions assessed are shown below:



Locations of Developments



Junction Locations

The junctions assessed are as follows:

- Barton Road/Station Hill mini roundabout
- Pokeridge Corner
- Fishwick Corner
- Station Hill/Ixworth Road/Norton Road junction
- Barton Road/Norton Road junction
- Bunbury Arms junction

By applying the trips from the developments to the existing highway layout, the Ratio of Flow to Capacity (RFC) and Queue lengths (Q) were calculated on the key junctions for future year 2024. Note If the RFC value is 0.85 or less, this indicates the junction is nearing but operating within capacity; 1 being at capacity.

By applying the committed sites, with growth and new trips from the proposed developments, the following table gave a summary of the Junction Capacity Assessments:

	Junction	2024 Base		2024 With Dev (T1 – T6)		2024 With Dev (T1 – T7)		2024 With Dev (T1 – T6 & T8)		2024 With Dev (T1 – T8)	
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
J1	C691 Barton Road / C562 Station Hill Three Arm Mini Roundabout	Green	Green	Green	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Green	Green	Yellow	Green	Green	Green	Yellow	Green
J2	C560 Beyton Road / C692 Thurston Road / U4920 Thedwastre Road Crossroads (Pokeridge Corner)	Green	Green	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Green
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green
J3	C693 Thurston Road / C692 Thurston Road Crossroads (Fishwick Corner)	Yellow	Green	Red	Green	Red	Green	Red	Green	Red	Green
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green
J4	C559 Norton Road / C562 Ixworth Road / C562 Station Hill staggered Crossroads	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
J5	C691 Barton Road / C559 Norton Road 'T' Junction	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
J6	A143 / C691 Thurston Road Crossroads	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Red	Green	Red	Green	Red	Green	Red	Green

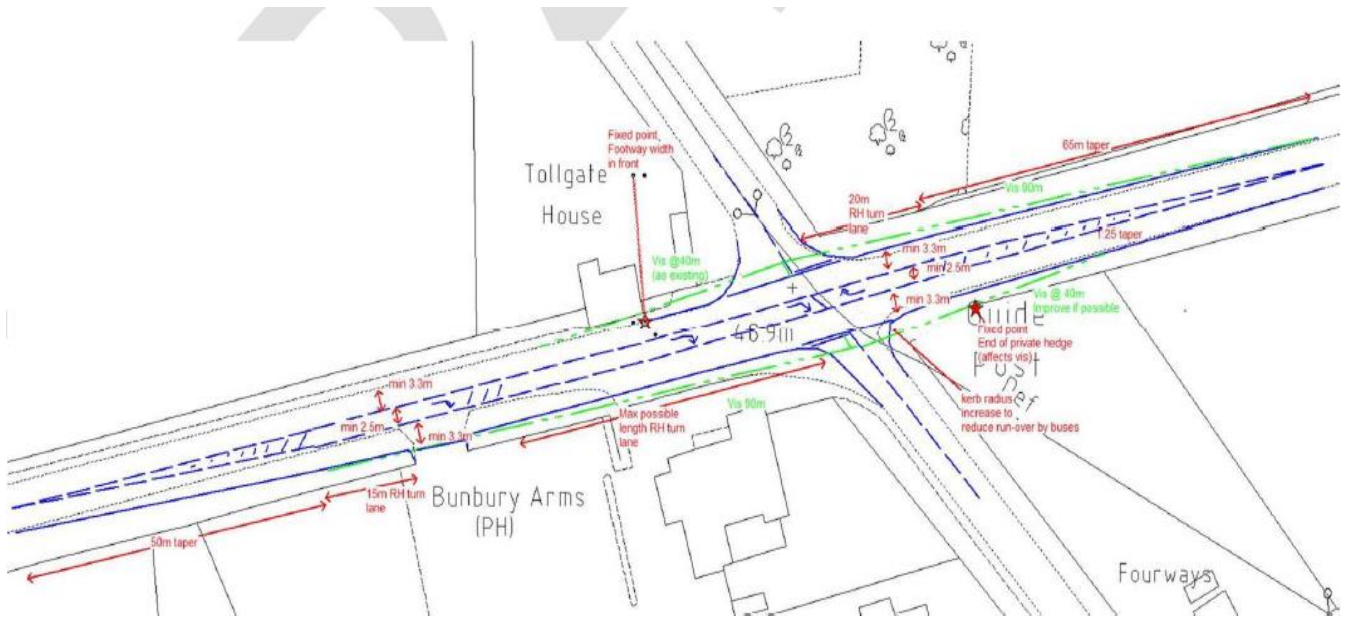
- within theoretical capacity – less than 0.85
- near capacity – between 0.85 and 1.00
- over capacity – over 1.00

The report concluded that the 2 developments shows Barton Road/Station Hill mini roundabout, Fishwick Corner and Pokeridge Corner junctions would all be close to or over capacity. With proposed mitigation from the Beyton Road Development, these junctions all operate within desired capacity limits for future year 2024.

The detailed designs of the junctions will be designed to current specifications and standards. A Stage 2 Safety Audit has also been completed on the junctions with the proposed mitigation measures. The audit did not identify major problems and minor items raised can be detailed during the s278 process during our technical approval process.

3. Junction Analysis and Evaluation of the Proposed Mitigation

A143/C691 Bunbury Arms junction



Existing situation	Proposed mitigation
<p>The mitigation from the 2017 developments included signalling the junction. The junction will be at capacity on two arms in the AM peak hour for the granted applications. This was accepted as the developments had mitigated their impact, but it was not possible to fully mitigate the background growth due to space constraints.</p>	<p>The proposed mitigation with contributions from the previous 5 applications, the 2019 AECOM indicates that the one arm of the junction will be over capacity during the AM peak hour and at capacity on two arms. On further assessment of the model data, we believe there is scope to improve the proposed preliminary design of the signals using better software and monitoring systems to improve capacity. However, no further mitigation, in terms of highway layout, is considered possible within the highway boundary.</p>

The signals capacity can be improved by installing Microprocessor Optimised Vehicle Actuation (MOVA). This operational method assesses the traffic flows approaching on each arm of the junction and then calculates which arm should be allocated what green time and alters signal timings to maximise capacity of the junction. This programme will improve the signals to 'at capacity level'. The developer has indicated that they are prepared to pay contribution for MOVA to be installed at this junction.

We also believe that the provision of a signal junction at the A143 junction will potentially result in a redistribution of traffic due to the additional delay for left turn out movements. The signals could also increase the right turn movements from Thurston, as it becomes more attractive manoeuvre no longer being directly opposed.

Barton Road Mini Roundabout and Rail Bridge/Beyton Road junction

Existing situation	Proposed mitigation
<p>Barton Road under the railway bridge has sufficient carriageway width to allow 2 cars to pass. However, with the arch of the bridge, high-sided vehicles have to use the centre of the carriageway to use the maximum height of the bridge, therefore no other vehicles can pass large vehicles except cyclists. Due to the height restriction of the bridge, use by high sided vehicles is restricted (single deck buses can use this route). The footways under the bridge are narrow; where the west footway terminates adjacent to the south-west bridge abutment 490mm wide and the other has a pinch point of 750mm.</p> <p>The carriageway is not parallel with the bridge abutments which restricts the forward visibility from Beyton Road junction under the bridge to 24.5m.</p>	<p>This application is not suggesting any mitigation for the traffic impact at this junction.</p>

C693 Thurston Road/C692 Thurston Road junction (Fishwicks Corner)

Existing situation	Proposed mitigation
<p>At Fishwicks Corner the primary cause for congestion is due to limited visibility at the junction. Being a crossroads with four-way movements also reduces capacity and adds to delays. The junction is an accident cluster site with 13 recorded injury accidents; 11 of which were drivers failing to look properly on the minor arms of the crossroads due to poor forward visibility. As part of the mitigation for the 2017 developments, a 40mph speed limit is being introduced with a change in the junction priority and altering the give-way scenario to Stop lines on the side roads. The predicted RFC with the 2017 developments following the revised layout of the junction was calculated as 0.93 in the PM peak.</p>	<p>This application is not suggesting any further mitigation for the traffic impact at this junction other than the previous 5 applications.</p> <p>It is not considered possible to deliver any additional mitigation to that proposed in 2017 within the current highway boundary,</p>

C560 Beyton Road/C692 Thurston Road/U4920 Thedwastre Road Crossroads (Pokeridge Corner)

Existing situation	Proposed mitigation
<p>Pokeridge Corner is also a crossroads where the primary cause of congestion is the lack of visibility from the side arms of the junction. It was considered the traffic impacts of the 2017 applications did not affect this junction to a point where mitigation was required. There were 3 accidents at this junction where drivers failed to look properly and overshoot the give way lines.</p>	<p>This application is not suggesting any mitigation for the traffic impact at this junction</p> <p>Limited improvements may be possible within the highway boundary but without proposal this cannot be confirmed.</p>
<p>The bridge over the rail track on Thedwastre Road has a vehicle priority system with a single lane road and a painted footway. The parish council has raised concerns on the pedestrian safety at the bridge due to the increase in traffic and pedestrian movements associated with this development. There has been no recorded crashes resulting in injury at this location and the visibility is good for all road users.</p>	<p>This application is not suggesting any mitigation for the impact of this development.</p>

4. Sustainable access to and from the Development

Proposed Cycling and Pedestrian Improvements

The developer is proposing a number of pedestrian and cycle improvements in Thurston:

- A new shared cycleway on the east side of Ixworth Road linking with footways at the junction with Norton Road.
- Tabletop traffic calming at Norton Road/Ixworth Road junction with zebra crossings
- Controlled pedestrian crossing on Barton Road near junction with Heath Road to provide a safe link for pedestrians and for cyclists for the NCR51 to the village.

To promote, encourage and support the principles of sustainable transport as outlined in the National Planning Policy Framework, safe and suitable access is required for bus services, pedestrians and cyclists to and from the site:

- The rail station is within the village and is approx 900m from the centre of the site
- The closest bus stop is 550m from the centre of the site with good bus service
- The primary school is 1000m (15 minute walk) and the secondary school is 450m from the site both schools are within walking distance.
- proposals to improve the cycling and pedestrian links to the schools and NCR51.
- National Rail, BMSDC and SCC and in talks regarding the existing pedestrian safety and accessibility within the station.

In terms of sustainable transport, the development has adequate access to public transport. Pedestrian links including those to the PRow network are adequate but good quality cycling facilities are limited.

5. Discussion

When considering this application, we have been careful to balance the negative impacts of the development against the positive impacts of some of the mitigation to provide an overall weighted conclusion to inform the Planning Authority when making their decision.

Capacity - An additional 210 dwellings from this specific development will place additional strain on the road network around Thurston, specifically in the Bunbury Arms, Fishwick Corner and Pokeridge junctions and the road under the rail bridge. An additional 210 dwellings on the site off Beyton Road will add to the cumulative traffic impacts on Thurston. The mitigation proposed for the 2017 was acceptable for that level of development but did not allow headroom for future development. Overall we consider that the impact of both developments would place an unacceptable strain on the highway network within Thurston with increased que lengths, delays and junctions at or approaching their theoretical capacity. Little mitigation is proposed to offset the impact of this development and therefore the impacts are considered to be severe.

Road Safety - In 2017 we expressed concerns regarding the impact of development in terms of road safety at the same junctions. The mitigations proposed for the 2017 applications were sufficient to mitigate their harm but not that of other future developments. One of the key concerns is Fishwick Corner where the 2017 mitigation was considered suitable for the impacts of the 5 developments and the best achievable with existing constraints. Therefore the

Sustainability: Existing Pedestrian and Cycle Links - The site has good links south to the village although there is a lack of formalised crossing points.

Without mitigation we consider that the impacts of this development would be severe in terms of capacity, road safety and sustainability (pedestrian and cycle access). The mitigation proposed by this development is considered to have a positive benefit in isolation.

School Transport - concerns have been raised by the Parish Council and residents regarding the removal of subsidised places on school buses and the impact on travel patterns. Pupils from the proposed development could reasonably be expected to walk or cycle to both the primary and secondary schools and the applicant is expected to provide high quality footways and cycleways to

enable this. However, Thurston Academy has a large, predominately rural catchment area the changes to school transport are likely to generate additional car trips from these areas for non-eligible pupils. As the policy is phased in and only started in September 2019 it is difficult at this point to assess the transport impact. It is clear that any impacts will be greatest (but not exclusively) at the Ixworth Road / Norton Road and Norton Road / Barton Road junctions. We are aware that Thurston Community College (TCC) are keen to continue to support bus travel to school and each year survey families of potential new year 7 students to see if there is enough demand to make a school-led bus option financially viable. The Highway Authority's main concern is the impact on road safety although congestion and inconsiderate parking also have to be considered. While it is not reasonable in planning terms to expect this development to mitigate the additional school traffic it is a matter that we consider should be included in the Planning Authorities weighing up of the application. We would also work with the developer to ensure that any mitigation proposed for their development, if permitted, should consider these impacts within the design process.

6. Conclusion

As the Highways Authority we have examined this application and the supporting information in detail. The additional development will lead to more vehicles, pedestrians and cyclists using the highway network around Thurston in addition to that from previously permitted development. Without mitigation we consider that the cumulative impacts are severe in highway terms. The mitigation proposed from this site does have some significant benefits for pedestrians and cyclists within the north of the village but when balanced against the lack of mitigation elsewhere we conclude that there is a cumulative severe impact and that there are unacceptable impacts on road safety.

Mitigation for Fishwicks Corner, Pokeridge Corner, and improvements to the highway at the rail bridge and required to reduce the severe impact for this site, therefore, we recommend this application is refused unless these issues are addressed to our satisfaction.

CONDITIONS

Should the Planning Authority be minded to grant planning approval the Highway Authority in Suffolk would recommend they include the following conditions and obligations:

V 1 - Condition: Before the access into the site is first used, visibility splays shall be provided as drawing No 18366-003B 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.

HW 1 - Condition: Prior to commencement of any works (save for site clearance and technical investigations) details of the highway improvements and mitigation (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing to the Local Planning Authority in consultation with Local Highway Authority. The details as agreed shall be delivered in accordance with a timetable for improvement which shall have been submitted to and agreed in writing by the LPA concurrent with the said details.

Reason: To ensure that design highway improvements/footways are constructed to an acceptable standard.

ER 1 - Condition: Prior to commencement of any works, (save for site clearance and technical investigations) details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

ER 2 - Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority in consultation with Local Highway Authority.

L1 - Condition: Before the development hereby permitted is commenced a Lighting design shall have been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interest of highway safety to avoid the hazard caused by disability or discomfort glare for motorists.

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging units and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

B 2 - Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

TP1 - Condition: Prior to the occupation of any dwelling details of the travel arrangements to and from the site for residents of the dwellings, in the form of a Travel Plan in accordance with the mitigation measures identified in the submitted Transport Assessment shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority. No dwelling within the site shall be occupied until the Travel Plan has been agreed. The approved Travel Plan measures shall be implemented in accordance with a timetable that shall be included in the Travel Plan and shall thereafter adhered to in accordance with the approved Travel Plan.

Reason: In the interest of sustainable development as set out in the NPPF, policies CS7 and CS8 of the St Edmundsbury Core Strategy and Strategic Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

TP2 - Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised Travel Planning and a multi-modal travel voucher.

Reason: In the interest of sustainable development as set out in the NPPF, and Strategic Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

HGV CONSTRUCTION - Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

S106 CONTRIBUTION

Travel Plan

As Suffolk County Council (as Highway Authority) have been identified as a key stakeholder in the Travel Plan process, a £1,000 per annum Travel Plan Evaluation and Support Contribution payable prior to occupation of the 100th dwelling to provide Suffolk County Council suitable resource to engage with the Travel Plan Coordinator appointed by the applicant. As this is a discretionary function of the County Council, this is chargeable under Section 93 of the 2003 Local Government Act and Section 3 of the 2011 Localism Act. This will need to be secured through a Section 106 Agreement or separate Unilateral Undertaking. If the contribution is not secured Suffolk County Council are unlikely to have the resource to provide the assistance which is identified in the Travel Plan, which is likely to result in the Travel Plan failing. Further guidance and justification of this contribution can be found in the Suffolk County Council Travel Plan Guidance (www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/26444-Suffolk-Travel-Plan-Guidance-V5-Printable-Version-LR.pdf).

Alternatively, Suffolk County Council can produce the Resident Travel Packs and deliver the Travel Plan on behalf of the developer if a suitable contribution can be agreed and secured through a Section 106 Agreement or separate Unilateral Undertaking prior to the determination of this application. If this is of interest to the developer, they can contact the Suffolk County Council Travel Plan Team at travelplans@suffolk.gov.uk to obtain a quote. Further information on this service can be found on www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Travel-Plan-Delivery-offer-to-LPAs-and-developers-2.pdf.

NOTES

The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure