

# Highways and Transportation Proof of Evidence

Site: land east of Ixworth Road Thurston Suffolk

PINS Ref: APP/W3520/W/23/3317494

LPA Ref: DC/19/02090

6<sup>th</sup> June 2023

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## 1. Personal Experience and Qualifications

- 1.1. I, Luke Barber, Strategic Transport and Policy Manager of Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX hereby state as follows:
- 1.2. I am employed by Suffolk County Council ("SCC") as the Strategic Transport and Policy Manager and have worked for SCC since 2004. I have been part of my current team since July 2015 and I am currently responsible for developing transport policy in Suffolk. I work within the Transport Strategy team which is responsible for overseeing the delivery of transport measures and infrastructure and responding to planning applications in Suffolk.
- 1.3. My role involves providing Statutory Consultation Responses and highways advice on strategic development consultations and providing expert advice at Planning Appeals.
- 1.4. I graduated with a Higher National Diploma in Mechanical Engineering from Kingston University in 1996, a BSc in Technology Management in 2005 and a Foundation Degree in Civil Engineering in 2008, the latter two from University College Suffolk. I have 18 years' experience working in Transportation and Highway Design in the public sector. I am a Road Safety Audit Team Leader with 10 years' experience of Road Safety Audit.
- 1.5. I present this Proof of Evidence to explain the Highway Authority's position in respect of the proposed development at land east of Ixworth Road Thurston Suffolk, (the "Site"), planning appeal reference APP/W3520/W/23/3317494, which is the subject of this appeal made by Gladman ("the Appellants") against Babergh Mid Suffolk District Council's ("BMSDC") decision to refuse planning permission.
- 1.6. SCC as Highway Authority is a Statutory Consultee to BMSDC's Planning Process. We provide highways advice and expertise in the form of Highways Consultation Response Letters during the Statutory Consultation period for a planning application.

- 1.7. I was not directly involved in the responses to the Planning Consultation on the application, however I have reviewed the file, the response letters provided and the appellants, Local Planning Authority's and other SCC team's evidence. My role includes leading on the Highways aspects of Planning Appeals for SCC. As stated below, the views and judgements contained within this proof of evidence are my own.
  
- 1.8. I have prepared Appeal Documentation, including Hearing Statements, Proofs of Evidence, Statements of Common Ground and CIL Compliance Statements for many appeals, including eight where I have attended in person. I have addressed Inspectors at appeal on behalf of SCC on several occasions and given Evidence in Chief and been Cross-Examined several times. In most of the previous appeals I have attended the SCC evidence has been considered at a Conditions and Obligations Round Table session.
  
- 1.9. Where the facts and matters set out in this statement are within my own knowledge, they are true and where they derive from other sources, they are true to the best of my knowledge and belief. I confirm that the opinions expressed are my true and professional opinions and are given to this inquiry as an objective and independent assessment.

## 2. Introduction:

2.1. SCC was consulted on the above reference application by BMSDC, and responded with the following letters, which are included in the appendices at the end of this document:

- SCC Highways Response dated 22 May 2019 (**CD 3.12**)
- SCC Highways Response dated 07 January 2020 (**CD 3.18**)
- SCC Highways Response dated 25 June 2020 (**CD 3.27**)

2.2. The May 2019 letter (CD 3.12) was a **recommendation of refusal** based on SCC concerns about Road Safety, cumulative impact on transport infrastructure, and issues identified with the transport assessment.

2.3. The January 2020 letter (CD 3.18) listed a number of residual issues and came to the conclusion that without significant mitigation the residual impact of the scheme would be severe. The mitigation package offered at the time was judged to be insufficient to address these impacts, therefore the recommendation was that **planning permission should be refused, on highways grounds**. However, a list of draft planning conditions and Section 106 obligations were provided, on a without prejudice basis, should the decision maker be minded to approve the scheme.

2.4. The June 2020 letter (CD 3.27) was an update to the previous letters, taking into account additional information provided by the applicant on the potential highways mitigation package. This letter came to the conclusion that planning permission should not be refused on highway grounds, as the NPPF paragraph 111 test was not breached, but there would still be some **negative highway impacts of the scheme**, that would need to be feed into the planning balance.

2.5. Suffolk County Council (SCC) as Local Highway Authority has produced this note to inform the Inspector of the Council's position regarding highway matters. It intends to cover baseline conditions within the area, the impacts associated with the appeal site and the anticipated impacts should the Inspector be minded to dismiss the appeal.

### **3. Proposed Development Mitigation:**

- 3.1. As outlined within Section 2.1.39 of the Highways Technical Note produce by Odyssey dated May 2022 (CD 2.7), Gladman have agreed to funding a Microprocessor Optimised Vehicle Actuation (MOVA) control system for an improvement scheme to signalise the A143 / C691 Thurston Road Crossroads junction (junction 6 on fig. 2 of the Aecom report – CD 10.14) which was assessed as part of a 2017 report prepared by AECOM which assessed the cumulative transport impact of five proposed residential developments within Thurston (referred to as the Thurston 5).
- 3.2. For clarity, Gladman only proposes to fund the MOVA traffic signal control system, not the junction signalisation scheme. The junction signalisation scheme is to be delivered through pooled contributions from several other developments within Thurston.
- 3.3. Additional highway mitigation measures include the creation of a shared walking and cycling facility on the east side of Ixworth Road, a toucan crossing adjacent to the site on Ixworth Road, tabletop traffic calming at the Ixworth Road / Norton Road / Station Hill junction including zebra crossings on Norton Road and Station Hill, and a controlled pedestrian crossing on Barton Road near the junction with Heath Road.

#### 4. Benefits of the Proposed Development Mitigation:

- 4.1. In terms of the A143 / C691 Thurston Road Crossroads junction (junction 6 on fig. 2 of the Aecom report – CD 10.14), results presented within the Odyssey Technical Note at Table 2.6 (CD 2.7) demonstrate that it would operate close to theoretical capacity with the vehicle trips associated with wider development within Thurston and the appeal site included. It is considered that this junction would operate more efficiently without needing to cater for the traffic resulting from this proposed development.
- 4.2. Paragraph 2.3.2 of the Odyssey Technical Note states that *“Gladman remain committed to offer to improve the signalised option for the Bunbury Arms junction by the addition of the MOVA element to the junction installation, which Odyssey considers would mitigate the minor additional vehicular movements from both the Bloor Homes and Gladman schemes, as well as some of the vehicles from the ‘Thurston 5’”*.
- 4.3. I agree that the inclusion of MOVA as part of the junction installation is necessary to mitigate the additional vehicular movements from the appeal development. However, were the appeal development not to go ahead, the delivery of the signalisation works will be delivered through pooled contributions from the other developments within Thurston (sites T1-5 on fig. 1 of the Aecom report – CD 10.14) in any event. Even if it were not delivered through a contribution from the appeal scheme when the junction is signalised, MOVA signal control could be added at a later date, if needed, and it is not considered that the development offers a unique benefit in terms of upgrading the A143 / C691 Thurston Road Crossroads junction. Thus, while the financial contribution is required to mitigate the site-specific impacts of the appeal development, that contribution does not in my view provide any wider strategic benefit.
- 4.4. In terms of the proposed shared walking and cycling facility on Ixworth Road, there is an existing shared walking and cycling facility on the west of Ixworth Road, beginning at the junction with Norton Road and terminating near the entrance to the rugby club. The proposed shared walking and cycling facility on the east side of Ixworth Road extends the length of the appeal site and does not provide a route on the east side of Ixworth Road thereafter.

- 4.5. While the proposed shared walking and cycling facility would be required to mitigate the impact from this proposed development, it is considered that it would primarily serve the development itself, given the existing shared walking and cycling facility on the west side of Ixworth Road which provides ongoing connectivity south of the site and direct access to residents of the development west of Ixworth Road. The benefit of the proposed shared walking and cycling facility, beyond mitigating the impacts from the development, would be limited and it is not considered that non-delivery of the additional shared walking and cycling facility would have a detrimental impact in terms of highway safety.
- 4.6. The proposed toucan crossing on Ixworth Road is also considered a measure which would primarily serve the development itself as its purpose is to provide a suitable crossing facility between the appeal site and the shared walking and cycling facility on the west of Ixworth Road. Therefore, the wider benefit of the proposed crossing would be limited, and it is not considered that non-delivery of the shared walking and cycling facility would have a detrimental impact in terms of highway safety.
- 4.7. While the developer has agreed to deliver a scheme to improve the Ixworth Road / Norton Road / Station Hill junction, financial contributions are included within the Section 106 Agreements associated with land to the west of Meadow Lane [T3], land west of Ixworth Road [T4] and land north of Norton Road [T5] to fund a crossing facility at this junction (see figure 1 of the Aecom report CD 10.14). The developer's scheme goes further than the previously secured improvements, as this site is likely to generate significant pedestrian movements in this area, and additional improvement work is needed to mitigate for the road safety impacts of these additional pedestrian movements. This developer's scheme would enhance the original scheme, in a proportionate basis to the additional demand generated.
- 4.8. As outlined within its response dated 07 January 2020 (CD 3.18), SCC considers that pupils from the proposed development could reasonably be expected to walk or cycle to both the primary and secondary schools in Thurston, generating demand for crossing at the Ixworth Road / Norton Road / Station Hill junction. Furthermore, it was considered that concerns raised by the Parish Council in its response dated 23 May 2019 relating to the removal of subsidised places on school busses could generate additional car trips above those associated with the appeal site between Thurston Academy and surrounding areas where



non-eligible students reside. It was considered that the Ixworth Road / Norton Road / Station Hill junction (junction 4 on fig. 2 of the Aecom report CD 10.14) would experience some of the greatest impacts resulting from additional car trips.

4.9. Considering the concerns outlined above, SCC supports the proposed enhanced improvement scheme for the Ixworth Road / Norton Road / Station Hill junction. However, as previously outlined, financial contributions to improve this junction (to a more limited extent) have been secured through other developments within Thurston. No additional land is required from the appeal site to accommodate the enhanced scheme. Therefore, it is not considered that the delivery of a highway improvement scheme is dependent on the appeal site. But this site will provide an enhanced scheme for this location, to mitigate the increase in pedestrian and traffic flow, resulting directly from this development.

4.10. It was considered that the alterations to subsidised places on school buses would increase car trips on Barton Road and Norton Road and consequently, a toucan crossing is proposed on Norton Road between its junctions with Heath Road and Norton Road. This is to mitigate the direct impacts in terms of increased pedestrian and traffic flows at this location.

4.11. SCC supports the proposed toucan crossing on Barton Road. However, this scheme is deliverable within land under the control of SCC (as highway authority). Therefore, if the appeal site was not permitted and did not facilitate this improvement and it was considered necessary to provide walking and cycling benefits to the wider area, SCC could deliver a scheme at this location through multiple alternative funding mechanisms. SCC anticipates that the greatest impact on Barton Road will be associated with development on the land west of Barton Road [T2] (see figure 1 of the Aecom report CD 10.14).

## 5. Comparison with the Highway Benefits associated with Land southwest of Beyton Road:

5.1. Previously an additional site in Thurston, outside of the original five sites was permitted.

This site is known as 'Land southwest of Beyton Road – Ref: DC/19/03486', to the south of Thurston (see site ref T8 on fig. 1 of the Aecom report CD 10.14). The appellants are drawing a comparison between this site and theirs. However, there are key differences between the highway benefits of the permitted site and the site subject to this appeal.

5.2. The above referenced permitted site proposed highway mitigation at Fishwick Corner (junction 3 on fig. 2 of the Aecom report CD 10.14) and the Beyton Road / Thurston Road / Thedwastre Road junction (junction 2 on fig. 2 of the Aecom report CD 10.14). These highway improvement schemes require additional land which was within the applicant's control. Therefore, the proposed improvements at these junctions are entirely dependent on land associated with the planning permission. This was a unique benefit of this site, and opened up options to improve highway safety that would not otherwise be available to SCC or other developments in the area to carry out. Without this additional third-party land, the improvement options for these two junctions would have relied on land that is current adopted highway. These, more limited, highway improvement schemes would have been sufficient to avoid serious highway safety impacts arising from the original 'Thurston Five' applications but would not have been sufficient to allow for further intensification of use of the highway network without unacceptable impacts on highway safety, which would have been contrary to P111 of the NPPF.

5.3. While the proposed shared walking and cycling facility on the east side of Ixworth Road and the toucan crossing adjacent to the site on Ixworth Road does require some of the land associated with the appeal site to be provided in their entirety, these improvements are considered to primarily serve the development itself. SCC considers that the existing shared walking and cycling facility on the west of Ixworth Road provides an acceptable walking and cycling facility along this section of Ixworth Road and that dismissal of the appeal would not present an unacceptable impact on highway safety.

No highway improvements associated with the appeal site – other than those outlined within paragraph 5.2 of this note – rely on land associated with the appeal site. Therefore, it

is considered that these improvements can be constructed in the future by SCC, if required, should the appeal be dismissed.

## 6. Summary of Highway Impact upon Dismissal of the Appeal:

- 6.1. SCC has considered the highway mitigation proposed with the appeal site and considers that the development offers no unique benefit to the A143 / C691 Thurston Road Crossroads junction, given that signalisation of this junction will be delivered through pooled contributions from several other developments and the committed MOVA signal control would only be needed to mitigate the additional traffic generated by the appeal site. Therefore, SCC considers that non-delivery of the proposed MOVA system following dismissal of the appeal would not present an unacceptable impact in terms of highway safety.
- 6.2. SCC considers that there is suitable existing walking and cycling provision on the west of Ixworth Road and that the proposed shared walking and cycling facility on the east of Ixworth Road and the toucan crossing on Ixworth Road, that would be secured from this site, would primarily serve the pedestrians and cyclists generated by this development site itself. Therefore, SCC considers that non-delivery of these additional highway improvements following dismissal of the appeal would not present an unacceptable impact in terms of highway safety.
- 6.3. While it is acknowledged that a crossing facility at the Ixworth Road / Norton Road / Station Hill junction would provide a benefit to the wider community, financial contributions have been secured from other developments within Thurston which can be used to fund a crossing at this location. Furthermore, no additional land is required from the appeal site to facilitate a crossing at this location. Therefore, SCC considers that non-delivery of a crossing facility at the Ixworth Road / Norton Road / Station Hill junction following dismissal of the appeal would not present an unacceptable impact in terms of highway safety.
- 6.4. While it is acknowledged that a crossing facility on Barton Road would provide a benefit to the wider community, no additional land is required from the appeal site to facilitate this improvement. Therefore, SCC maintains the ability to provide a crossing at this location should it be necessary and considers that non-delivery of a crossing facility on Barton Road following dismissal of the appeal would not present an unacceptable impact in terms of highway safety.

6.5. Overall SCC did not object to this application, subject to adequate highways mitigation being secured through Planning Obligations and Conditions. Subject to the above improvements being secured from this site SCC has confirmed that there would be no severe cumulative impacts and no unacceptable impacts on highway safety resulting from this site being permitted. This is common ground between the parties.

6.6. However, there is also no 'special benefit' arising from permitting this site and securing these highway improvements. They simply mitigate for the highway impacts directly arising from the appeal site. Unlike the Fishwick Corner and the Beyton Road / Thurston Road / Thedwastre Road junction improvements secured from 'Land southwest of Beyton Road', which did provide for wider benefits to the highway network as additional land for improved mitigation options was made available through the application process.

Therefore, there is no conflict with P111 of the NPPF arising from allowing this appeal, but equally no conflict arising, in highways terms, from dismissing the appeal either.