

**Save Our
Rural Roads
Report**

October 2008

*“Reclaiming
Suffolk’s
Rural Roads”*

THE CAMPAIGN TO SAVE OUR RURAL ROADS (SORR)

“RECLAIMING SUFFOLK’S RURAL ROADS”

Representing:

The Parish Councils of:-

**Bredfield,
Clopton,
Coddensham,
Charsfield,
Grundisburgh & Culpho,
Hasketon,
Hemingstone,
Little Bealings,
Otley,
Witnesham & Swilland,
Wickham Market.**

The Parish/Village Meetings of:-

**Burgh
Debach**

SORR has been established for over ten years. It represents sixteen rural parishes, primarily in the east of Suffolk, and its aims are to:

- § Reduce the damage caused to the quality of life in rural communities by the ever increasing volume of HGV traffic along unsuitable country roads.
- § Improve the safety of our rural roads to ensure that they do not become “no-go” areas for walkers and cyclists.
- § Challenge the inordinate costs needed to repair the damage to our rural roads caused by unnecessary HGV traffic.

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Abbreviations used in this document

FTA	Freight Transport Association
LDF	Local Development Framework
LTP	The Suffolk Local Transport Plan
HGV	Heavy Goods Vehicle (over 7.5 tonne gross weight)
PDP	SCC's Policy Development Panel into Lorry Issues
PPG	Planning Policy Guideline
PPS	Planning Policy Statement
PSV	Public Service Vehicle
SCC	Suffolk County Council
SCDC	Suffolk Coastal District Council
SORR	The campaign to Save Our Rural Roads
TA	Transport Assessment
TS	Transport Statement
VOSA	Vehicle and Operator Services Agency

1. INTRODUCTION

SORR produced its first Report in October 2007. It was subtitled “Re-Arranging the Deck Chairs” to reflect the way in which this problem was being managed. Since then there have been some significant changes in policies and general awareness / recognition of the problems. This report re-states the issues, outlines the actions that have been taken and addresses the actions that are still required. The subtitle for this report is “Reclaiming Suffolk’s Rural Roads”

There is no dispute that lorries on unsuitable rural roads have a major detrimental impact on the communities through which they pass. Some will put forward the argument that we need to face reality and that increasing HGV traffic is the inevitable price we must pay for developing the rural economy.

SORR takes the view that we cannot accept the unfettered intensification of HGV traffic along these roads. There is a balance to be struck between developing a vibrant economy and maintaining the quality of life for rural communities. The Suffolk countryside is one of our major natural resources and is the basis of a flourishing tourist industry. It is also an asset to be enjoyed by people from our own local towns and urban areas. It is precious and ought to be cherished and protected.

In the main, the HGV problem results from:

- § The inappropriate location of commercial sites in rural areas accessible only by rural roads,
- § The growth in transport and haulage operations throughout the county coupled with the inadequacy of the trunk road network to support this growth.
- § The lack of recognition of the problems and the resultant lack of a co-ordinated and determined approach to protect rural roads and the communities that live alongside them.

Consequently, the solutions require an agreed stance and close collaboration between by district planning authorities, SCC as Transport Authority and the local communities affected.

SORR and its member parishes have challenged, and will continue to challenge, planning applications which would bring continued and increased HGV traffic along these roads with no resultant benefit to the rural economy. We have lobbied SCC over many issues and have worked closely with them to bring improvements.

We have seen, in the first Local Transport Plan, efforts to implement effective HGV traffic management schemes. Similar measures are proposed in the current LTP. However, these schemes are often ignored and the overall traffic levels on rural roads continues to increase. The major consequence is that people are expressing ever more concern about the safety on these roads and they are rapidly becoming “no-go” areas for pedestrians and cyclist.

In 2007, SORR commissioned three surveys to assess the safety of some of the roads included in the Lorry Routing Plan They were undertaken by the Freight Transport Association, who has represented the freight industry in the consultations for the preparation of the Local Transport Plans. The results of all three surveys conclude that

these roads are not suitable for HGV traffic. A summary of these conclusions are shown in Appendix 1.

The nature of the problem has long been acknowledged, for example in the Government White Paper on Rural Affairs produced in 2000. The problems in Suffolk are exacerbated by the poor quality of its "A" class. The first Suffolk Local Transport Plan (2001 –2006) contained the following statement regarding the rural road network in Suffolk:

*"The essential role that lorry movement has to play in the economy of the rural parts of Suffolk has to be recognised. The delivery of goods and services to and from individual farms, the widespread nature of industrial estates and need to service small towns and villages all rely on the movement of freight around the county by lorry. **However, much of the highway network in Suffolk comprises fairly weak, narrow and poorly aligned rural roads.** Increasing HGV weights and usage leads to break up and overrunning of the carriageway, both of which lead to ingress of water and deterioration of the road structure. Subsequent repairs result in further delays and interruption to business. The size and speed of vehicles means that communities can experience intimidation and a perceived, if not real, lack of safety."*

SORR considers that, despite this, there has been little evidence that the scale and nature of the problem (and its true impact on local communities) has been fully appreciated. Over ten years, SORR has gathered the experiences of local communities and the practical realities of sharing our rural roads with an ever-burgeoning flow of HGV traffic. We have also experienced the efforts required (and the frustrations) of trying to achieve some effective improvements. This report draws on these experiences, discusses the progress that has been made and the areas that still need to be addressed.

In particular, SCC has now completed its Policy Development Panel into lorry related issues and the SCC Cabinet has endorsed its recommendations. The Local Transport Plan has not been amended but these new policies will provide a new focus for the actions that are now required. They demonstrate that the problems have been recognised and that additional action is required.

2. UNDERSTANDING THE PROBLEM

The LTP claims to address “Quality of Life” issues relating to the rural road network. Until the Policy Development Panel was established, there was little evidence that this aspect of the Plan was being taken seriously.

Most rural roads have no footpaths or street lighting: they have tight bends with restricted visibility. HGVs are positively routed along not just along “A” and “B” class roads but also “C” class and unclassified roads. Many roads (including some on the Lorry Route network) are too narrow even to have a white line in the centre of the road. There are speed limits in most villages, but these are rarely enforced. On the remainder of the network, the national speed limit (60 m.p.h.) applies. A 40-tonne vehicle passing within inches, often at speed, is extremely threatening for pedestrians, cyclists and horse riders. HGV traffic on these roads is dangerous and residents are fearful for their safety and reluctant to use the roads even for short journeys to neighbours.

In our 2007 Report, we listed some of the common complaints from people using rural roads:

- § Car drivers being forced onto the verges,
- § Cyclists being forced into the verge or kerb,
- § Lorries exceeding the speed limits (particularly when negotiating bends),
- § Lorries ignoring weight restrictions,
- § Delays caused by blockages when lorries meet buses, large tractors or other lorries travelling in the wrong direction on advisory routes,
- § Vehicles falling into ditches,
- § Regular occurrence of scrapes and dents and “near misses”,
- § Reluctance to walk or cycle along the road because of the inherent dangers,
- § The need for residents to protect their front gardens with artificial bollards/rocks,
- § Excessive traffic noise from HGVs,
- § House shaking and vibration from HGVs.

This list is still valid. It has been reinforced by the results of the survey (undertaken by SORR in 2008) of 320 residents living on the road network around the Debach Enterprises’ site at Clopton. The full results are shown at Appendix 2. It presents a snap shot of people’s actual experiences on these roads. 75% of residents complained about the noise of HGVs.

Over 92% of motorists had been forced onto the verge by HGVs and almost 69% had suffered actual damage. However, the most disturbing statistic is that nearly 86% of people felt reluctant to walk or cycle along their roads.

The level of concern increases with the volume of traffic. Occasional HGVs create fear but this increases considerably as the volume of traffic multiplies because a walk or ride of any length almost certainly guarantees an encounter with an HGV. The end result is the breakdown in communications and interaction between people in the same village.

There can be no doubt that HGVs on rural roads have a considerable negative impact on the quality of life of those who use these roads and those who live in close proximity. If genuine emphasis were concentrated on achieving improvements to our quality of life, we could expect to see some positive and **radical** actions to regulate the traffic that is destroying that quality.

Conclusion.

There has been considerable progress in the recognition of the impact and scale of the problem and an acceptance that something more must be done. However, increasing the awareness and acceptance by all councils and the general public must remain one of SORR's main objectives because we still have a long way to go on the "hearts and minds" issues.

3 ROAD SAFETY ISSUES.

There is a belief that rural roads are safer places to drive – but they are wrong. More than half (53%) of all fatal crashes occur on rural roads. In 2004, 12,728 people were killed or seriously injured on these roads in Great Britain. Source: Freight Transport Association

We appreciate that SCC has to meet government targets on the “Killed and Serious Injury” (KSI) incidents and targeting these sites is a good way of directing scarce resources. Overall, SCC is meeting, or bettering its KSI targets. However, it seems that this is at the expense of other rural roads in Suffolk. For the purpose of the LTP, all the other types of accidents and incidents are categorised as slightly injured or “slights” (for definitions see Appendix 3). The current LTP is not having a material impact on these.

SCC cannot continue to assess safety issues on accident statistics alone. As our three FTA safety surveys demonstrate there are real and genuine safety issues involved in routing lorries over these roads. These are not just “perceived” or imaginary dangers. Exposure to dangerous situations and the potential for serious accidents is a daily fact of life for many rural communities.

Losing Our Roads for Walking and Cycling

Although these very roads are dangerous for pedestrians and cyclists there is little or no money in the kitty to do anything about them. The LTP places a strong emphasis on schemes to encourage cycling and walking. Considerable effort and expenditure is being directed towards such schemes. Unfortunately, as little or no effort is being directed towards the bulk of our rural roads, these are fast becoming too dangerous for these user groups. Since the issue of our first paper, we have received considerable support from groups and individuals around the county on this aspect.

The schemes that are implemented are predominantly concentrated on urban areas and we are reaching the state where it is now safer to cycle on congested urban roads than on rural country lanes. We can no longer accept the situation that, through good fortune, nobody has been killed and therefore nothing can be done to improve the safety of our roads. SCC did lead other councils in the 1990s with the blanket introduction of 30mph limits in all villages, but now they are rarely enforced.

The serious accident rate is kept down largely by the increased vigilance of non-lorry road users, for it is mainly down to them to take evasive action. The consequences of a collision for car drivers or cyclists are markedly greater than for the driver of the lorry. Also, since fewer people are using these roads for walking and cycling because they are dangerous the accident statistics are kept down.

The Role of The Local Planning Authority For Road Safety.

Our efforts to date have been directed towards the Transport Authority since they have a defined responsibility for road safety. LPAs have, in the past, tended to deny or minimise their responsibilities in this area.

SORR maintains that the LPAs also have a major role in highway safety and this is confirmed by paragraph 29 of PPG13:

*“The Government places great emphasis on people being able to travel safely whatever their chosen mode. The planning system has a substantial influence on the safety of pedestrians, cyclists and occupants of vehicles through the design and layout of footpaths, cycleways and roads. **Planning can also influence road safety through its control of new development. When thinking about new development, and in adapting existing development, the needs and safety of all in the community should be considered from the outset, and addressed in the Transport Assessment accompanying development proposals, taking account of the importance of good design.**”*

Width of Vehicle

It is self-evident that, if the width of a vehicle (of any weight) is equal to or greater than half the width of the road, it will cause safety issues for other road users. It requires total control and concentration by HGV drivers to ensure that their vehicle is maintained close to the side of the road. This is seldom achieved for very practical reasons. To quote one director of a local company “they drive to avoid the hedges to protect their curtain sides and their mirrors whenever possible.” The danger increases considerably when the road has acute or blind bends. Where wide vehicles driving in opposite directions cannot pass, one must reverse, creating further safety issues and serious delays.

Left-Hand drive vehicles

An increasing number of vehicles are foreign with left-hand drive. On even shallow bends it is impossible for the drivers of these vehicles to see what is coming in the opposite direction. Many of the “near misses” reported involve left-hand drive vehicles. Following an accident between Spanish lorry and local car on BI079 at Grundisburgh, the Police decided not to take action against the driver of the lorry. They concluded that, as lorry had a left-hand drive and because the road was so narrow on that corner, “he could not have managed any better”.

Excessive Speeds

Speed data collected by the Transport Research Laboratory (TRL) for a large sample of rural single-carriageway roads shows that current average speeds vary from between 35mph on the lowest quality roads to 51mph on the highest.

MEAN SPEEDS ON RURAL ROADS		
Road Quality Group	Key features	mean speeds (mph)
1 – low quality,	Low speed, hilly, many bends	35
2 – lower than average	Below average speeds many bends & accesses	41
3 – higher than average	Above average speeds; many junctions; relatively straight & flat	47
4 – high quality	Above average traffic speeds; few bends, accesses & junctions.	51

Source: Taylor, Baruya and Kennedy (2002) The relationship between speed and accidents on rural single-carriageway roads, TRL Report TRL511

For most sections of these roads, the national speed limit applies. In response to the concerns of the community, however, there have been an increasing number of speed restrictions. We have now reached the situation where it is deemed counter-productive to create many further speed restrictions. With this increase ought to come increased enforcement, but it must be recognised that funding for the police does not enable this. It is not unusual for there to be no speed checks at all on some roads. If residents complain sufficiently, it is possible to achieve an occasional speed check for half a day every two years or thereabouts. In reality, the restrictions currently have little or no impact on the speed of vehicles, including HGVs. Results from the “SID” or “Smiley Face” schemes show that some improvements can be achieved. Also, many villages are about to join the Community Speed Watch programme that provides “Do It Yourself” monitoring and reporting opportunities. It is to be hoped that these will also bring about improvements, particularly if it is used in conjunction with the HGV Incident Reporting Procedure.

Conclusions.

1. We need to start a process whereby the roads can be made safer for all users with minimum demands on the SCC budget and to coerce SCC into finding more money for footpath/cycling schemes and “quite lanes” initiatives.
2. A significant step would be to achieve a reduction in the volume of HGV traffic on these roads. It is simply not acceptable to continue to allow more and more lorries along these dangerous routes with little regard to the actual (not perceived) safety of the roads involved.
3. We need to reduce the cost of road maintenance necessitated by the HGV traffic and divert some of the cash into more useful safety schemes.
4. SORR could forge links with other campaigning groups who are promoting cycling and walking.
5. It is valid that we should challenge planning applications on the grounds that consent could be detrimental to road safety in the surrounding network.

4. DEGRADATION AND LOSS OF AMENITY

Residents who live along roads carrying this inappropriate HGV traffic suffer greatly from loss of amenity. This includes such effects as noise, vibration, damage to property, visual intrusion, and air quality.

Virtually all rural roads do not have the basic foundations designed to carry 40-tonne vehicles. Many have the cheaper large grade granite topping that creates a very noisy road surface. There are many householders in close proximity to these roads who have to tolerate not just the noise but also the vibration and consequential damage to their houses. In extreme cases, such as the village of Coddendam, the HGVs are damaging very precious Grade 2 listed buildings that have stood for centuries.

5. ROAD DAMAGE, REPAIR/MAINTENANCE COSTS

This relates to the damage for which SCC has responsibility to repair and includes damage to road foundations, road surface, verges, kerbs and street furniture.

Such damage makes these roads even more dangerous and unsafe for drivers, cyclists and pedestrians alike.

§ *A 40 tonne, five-axle lorry causes tens of thousands of times more damage than an average car.* Source: Highways Agency

§ *Between 2000 and 2005, £1.1million was spent on repairing just three rural roads-the B1078, B1079 and C309.* Source: Suffolk Highways Dept.

Already in 2008 the cost of repairs to roads around the Clopton Commercial site have cost in excess of £300,000. The equation is simple - the greater the volume of HGV traffic, the greater the repair costs.

This must be a key issue for any transport policy. The damage directly attributable to HGV traffic on unsuitable roads is substantial and incontrovertible.

The extent of this damage and the cost of the consequential repairs are well known to SCC. The funding of repair work for such damage constitutes a major demand on the annual maintenance and repair budget. This is not expenditure on new roads or highway improvement schemes. It is simply money to undo the results of vehicles travelling on roads that were never constructed to take them. Even so, not all damage is corrected. Much of the verge damage is left to correct itself.

Given the forecast growth in HGV traffic, serious consideration must be given to the inevitable increases in costs just to undertake essential repairs. What level of increase is it reasonable to expect the council taxpayer to meet? Unless expenditure continues to increase at its current rate, we could have to accept a reduction in the quality of our rural road network.

It is our view that all costs and the nature of the repairs must be made fully transparent. We cannot continue to divert vast sums onto this work unless we can be sure that every effort has been made to reduce the damage to our roads (i.e. by ensuring that HGV traffic along them is kept to an absolute minimum).

Conclusions

1. SORR must press for much greater visibility of the costs involved in the maintenance of whole rural network across the county and establish a data base to show:

§ The detailed analysis of the costs of repairs caused by HGV traffic on roads that do not have the foundations to carry such traffic

§ Projected costs that are likely to result from the forecast traffic increases.

2. This analysis is essential to show the potential for real cost savings that could be achieved with a strategy aimed at reducing the HGV usage on rural roads.

3. Every opportunity should be made to divert any savings made towards the improvement of safety on rural roads.

6 TRAFFIC GROWTH FACTORS

“Nationally, articulated lorry traffic is expected to grow by 23 per cent by 2010, 33 per cent by 2015 and 45 per cent by 2025.” Source: Department for Transport 2004

With the expansion of operations in the Haven Gateway, the forecast increase in Suffolk is much higher. This growth will bring severe problems to the overall network. We have few good-quality “A” class roads. The main trunk routes (A12 and A14) are already over-stretched. Inevitably this limits the scope for routing lorries across the county. Congestion at peak times and following accidents, puts pressure on the alternative rural routes. Increasingly, drivers will attempt to find alternative, quicker routes through the county.

This road network is also desperately short of HGV overnight parking and rest facilities. There is already evidence that HGV drivers are leaving the main routes in order to find places where they can stop to meet the legal rest requirements.

The problems that face the main trunk routes are recognised. There is little evidence that the impact of increases on this scale on the rural network has been considered in the formulation of our Transport Plans.

The Department for Transport is currently reviewing whether to allow trials of longer and heavier lorries on UK roads. The lorries are up to 30 metres long, and weigh between 60 and 84 tonnes. The 60 tonner is 50% longer and over a third heavier than the 44 tonne lorries that already use our roads. They are totally unsuited to our roads on economic, environmental and especially safety grounds.

Should the decision be made to allow any increase in gross weight it is essential that SCC has considered the implications in advance and is prepared to implement a blanket 44 tonne weight restriction on all roads except the main A class trunk roads. They must never be allowed to venture onto rural B and C class roads.

7. INCIDENT REPORTING SCHEME

It has been accepted that few people are aware of the Incident Reporting Scheme and, consequently, it has not been widely used. Accurate data is of paramount importance for a number of reasons:

The need for radical change.

SCC uses this data in their assessment of the problem areas. Since public usage of the scheme has been spasmodic (and in many areas, non-existent) it is hardly surprising that our Transport Authority do not have an accurate measure of the conditions on our rural roads. This base data is needed to provide a measure of the scale and extent of the problems.

Optimum uses of resources.

The LTP has targets set for the Effectiveness of Lorry Intervention Schemes (L3) -

§ L3(a) - 10% reduction in HGV traffic in the areas impacted by the intervention schemes

§ L3(b) - 15 communities per year benefiting from intervention schemes.

This is not over-generous, but we must be realistic. With the current funding plans this is probably the best we could expect. It is therefore vitally important that these scarce resources are directed towards the most deserving causes. The Incident Reporting Scheme, if implemented properly and used to its full effect, should be at the heart of this decision making process.

Feedback on the effectiveness of the measures taken

The effectiveness of the measures taken in the Lorry Intervention Schemes is to be assessed using the Incident Reporting Scheme:

“The recording and follow up action of notified incidents using a publicly available incident reporting form. The number of reported incidents, which have resulted in action taken, will be recorded to measure the number of communities benefiting from L3b.”

The 10% reduction should be reflected in changes in before and after traffic counts and the number of communities benefiting from the actions should be apparent. These should, logically, bring some improvements to the communities but it is difficult to assess the impact of such interventions on a community. The real benefits to the quality of life of the communities affected should be evident from the number and nature of the incident reports.

For the above reasons, SORR has lobbied hard to bring about improvements to the scheme. SCC has now introduced an interactive, on-line reporting form accessible through their main web site. This will be launched across the county in the near future and SCC has assured us that it will be given substantial publicity. In addition, we are expecting the site to be developed such that we can have visibility of the incidents and the actions taken as a result.

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The effective formulation and implementation of the Local Transport Plan therefore depends in good part on the involvement and input from the community.

Conclusion.

SORR must ensure that people use the improved on-line scheme across the whole county. We need to develop the process for achieving this within the resources available to us.

8. ADVISORY ROUTES

SCC has directed considerable effort into discussions with freight operators to persuade them to use advisory routes. This has achieved mixed results. Some change in operators' behaviour has been detected. A number of operators have issued instructions to their drivers and displayed notices showing the preferred routes.

Overall, however, it has been our experience that the advisory routes are routinely ignored. There are obvious reasons for this.

Sub-Contracted Freight Operators.

Much of the transport is sub-contracted to other freight companies. Although local businesses might genuinely wish to adhere to the advisory routes, the sub-contractors do not have the same concerns about the local environment and community.

Foreign Drivers

Many vehicles using these routes are foreign-owned and operated. In addition, the operators and their sub-contractors are using an increasing number of foreign drivers. Many of these either do not understand the concept of advisory routes or they pretend not to.

Operational Costs.

The pressures on the time and costs of freight movements ensure that a driver will take the quickest or cheapest route if there is no form of penalty for so doing. For example, the advisory route from Debach Enterprises to the A14/Midlands is via the A12 around Ipswich. This adds about 20 minutes to the trip and around an extra £15 to the cost compared with running through the B1078.

Satellite Navigation

These currently route vehicles along shortest routes and do not recognise advisory schemes.

Conclusions

- § Schemes use voluntary, advisory routes, as an essential element in the management of HGV traffic. They have played a major part in lorry management plans over many years. However, they have substantial limitations and cannot be regarded as the long-term solution to the problem.
- § To be effective, routing has to be compulsory (except for legitimate access) and SORR should lobby to have advisory routes made mandatory.

9. WEIGHT RESTRICTIONS

SCC consider 7.5 tonne weight restrictions to be a major control for alleviating problems on narrow country roads. Very often, these involve one-way weight restrictions. These do have an effect, but they do not provide the complete cessation of two-way heavy traffic along narrow roads.

- § Commonly, very large tractors and trailers are used in lieu of HGVs because they avoid HGV weight restrictions (even though they are of a similar size).
- § PSVs are also exempt from the weight restrictions as are HGV tractor units without their trailers.
- § We have noted that foreign drivers, in particular, pay little heed to the advisory routing or weight restrictions for there are no real sanctions applied to those who violate the restrictions.
- § Local access is often used as an excuse for violation even when it is patently obvious that the vehicle had no reason whatsoever to visit a local farm or business.

Enforcement of the weight restrictions is almost non-existent and we cannot reasonably expect the Police to increase the effort on this type of enforcement. Again, it is for the local residents to report violations but there is no simple, quick process available that will achieve any results. Those who try give up after a short while because their efforts achieve no improvements.

Again, the Incident Reporting Scheme could form a major enforcement tool.

10. SATELLITE NAVIGATION SYSTEMS

Few (if any) sat-nav systems have details programmed into them advising HGV drivers of preferred routes, weight restrictions or simply obstructions that make it impossible for them to use a particular road. There have been numerous high profile incidents.

SCC has acknowledged the problems caused by the use of inappropriate sat-nav systems by HGV drivers. Currently, they are working with Somerset CC on a scheme to input relevant data into systems designed specifically for drivers of heavy vehicles.

When implemented, this should result in significant improvements, but it cannot solve the problem entirely.

- § Many of the routes will be advisory, and there is no compulsion to follow them. For the first time visit, sat-nav would route vehicles along the preferred roads. With familiarity, drivers will ignore their sat-nav and seek out the quickest and most economical routes.
- § With the lack of good quality “A” class roads in Suffolk, it has become necessary to designate many “B”, “C” class (and even unclassified) roads as part of the Lorry Routing Scheme. Residents along these roads will see no improvements and could even experience a worsening of their situation.
- § There is an increasing number of foreign vehicles and drivers on our roads and they rely heavily on their sat-nav systems. If this scheme is to succeed, it is essential that their systems also contain the HGV specific information.

Conclusion.

1. We understand that SCC has been at the forefront of developing a sat-nav system for HGV drivers. We recognise that this is a complicated area to regulate. With no relevant laws, achieving effective control over sat-nav routings has the potential to drift into the next century. SORR has not been particularly active on this issue and must now support SCC in its efforts to achieve some early results.
2. Given that this is a national issue, we ought to be lobbying our MPs and appropriate government

11. EXAMPLES FROM OTHER COUNTIES

SCC has concentrated its effort on actions to manage and control specific problems in particular locations.

Although there will always be a requirement for such actions, the inescapable conclusion is that our rural roads and communities are paying an unacceptably high price trying to cope with the current levels of HGV traffic, let alone the projected increases. The crucial focus must be directed towards reducing the scale of the problems caused by HGVs on our rural roads.

These problems are not unique to Suffolk. Other Transport Authorities are addressing the underlying causes and lessons can be learned from those authorities. The direction being taken in Leicestershire and Gloucestershire provides good examples of what can be achieved. Both of these counties have severely restricted use of rural roads by HGVs.

The measures taken in the Gloucestershire Local Transport Plan include:

- § Introduce area-wide lorry restrictions,
- § Close liaison with parish councils and other community groups in the formulation of plans,
- § Introduce “Lorry Watch”, a scheme whereby parish councils monitor the lorries in their communities and can report abuses in the knowledge that action will be taken.

Leicestershire has the advantage in that they have a good network of “A” class roads. They have been able to re-classify roads, radically improve signage and have had area lorry bans in place across the county for some time. This has been hailed by local residents and haulage operators as a success, and it has substantially reduced the repair costs on their minor roads.

The important issue with such bans is enforcement. It can be seen from Appendix 4 that Leicestershire are utilising camera technology and are actually taking action against lorry abuse.

Clearly, the situation with the Suffolk road network is different, and these ideas might not be applicable to our conditions in all cases across the county.

Conclusion

SCC has proposed to undertake a trial of the “Leicestershire” model in our area in the near future. SORR must strive to ensure that this happens and to support it in any way it can.

12. THE SOURCE OF HGV TRAFFIC.

Legitimate Users.

The key issue is whether the HGVs are essential or contributing to the local economy and could not, reasonably, be located elsewhere. Clearly, activities associated with agriculture are an integral part of the local community. However, there are caveats:

- § Often the justification for manufacturing or warehousing activities is that it would create local employment opportunities, e.g. the re-use of redundant farm buildings. This category can be regarded as contributing to the local economy, but serious considerations must be given to such applications. Very rarely does such a use result in employees walking or cycling to work. If they have to use a car, then there is little intrinsic benefit. There would be little difference to the rural economy if such operations were sited adjacent to the main road network rather than at the end of a country lane.
- § Secondly, there needs to be strict conditions on planning consents to protect against future expansion and intensification. Traditionally, animal rearing has been regarded as agricultural. However, Suffolk is the centre of high-intensity poultry rearing and processing units. The characteristics of these are more akin to an industrial process involving animals. They use the largest road-legal vehicles, and generate considerable levels of traffic - movement of birds, waste, straw, feedstuff. Again, serious consideration must be given to the effects of this traffic on the surrounding road network and the potential for future expansions.

Rat Runners.

Despite advisory lorry routes and attempts to coerce transport operators to use them, economic pressures will still prevail. If there are no regulatory weight or width restrictions drivers have a legitimate right to use any road in Great Britain. The general consensus is that if a lorry route is properly signed and does not incur untoward extra distance, drivers will follow advisory routes. Transport operators acknowledge that the use of rural roads can lead to increased overheads in terms of fuel costs and time. The problems arise when the preferred routes become congested, or involve considerable extra mileage. These create the cross-country short cuts and rat runs designed to reduce operational costs.

Avoidable Users.

Predominantly, these are operations that do not need to be located in the countryside and which have no natural affinity with the local communities. It must be recognised that purpose built facilities for warehousing and industrial usage, located at appropriate centres are comparatively expensive. There are clear financial incentives for businesses to build new, or re-use existing, units in rural areas. Not only does this reduce initial outlay, it provides an ongoing reduction in operating costs. District councils therefore face constant pressure for planning consent for this type of development.

13 PLANNING ISSUES

SORR raised the issue of the inappropriate siting of operations that generate HGVs as long ago as 2001. Peter Thompson (Director of Environment and Transport) at a meeting between SCC, SCDC and SORR agreed the following form of words:

- § To restrict such operations to sites on, or adjacent to, the primary route network.

This condition would be applied to all planning applications for sites requiring access by HGVs across the county. In our previous report, we concluded that this had achieved little impact on decision making at the planning determination stage. Our experience indicated:

- § The HGV issue still remains a low priority for the planning authorities when determining planning. By contrast, one their prime considerations is the provision of opportunities for local employment.
- § There is no evidence that planning committees give any serious consideration to traffic implications beyond the immediate site referenced in the applications. As a general rule, planning authorities leave traffic issues to the Transport Authority. However, the Transport Authority can only provide an opinion or recommendation and can be overruled by other considerations. The final decision rests with the Planning Authority.
- § Planning applications consistently underestimate the number of HGVs that will use a site. Applicants and their agents know that checks of these estimates are not commonly carried out and the true impact is rarely assessed. The traffic levels quoted in the estimates are seldom made a condition of the planning consent. Consequently, once planning consent is granted, there are no restrictions on the number of vehicles that can use that site. As one-man businesses expand, so does the level of traffic.

Our conclusion is that communities need to be vigilant regarding planning applications that could result in increased HGV traffic. To do this we need to know:

- § about them in good time,
- § the type and potential volume of the HGV traffic involved,
- § traffic estimates are consistent with the type and scale of the operations proposed,
- § the planning policies and guidelines applying to each particular application.

13.1 Getting the Details

Notification of Planning Applications.

Planning Authorities have an obligation to provide wide publicity for planning applications. Apart from notifying immediate neighbours and press advertisements, full details should be provided to parish councils for their consideration. This process

usually works. It is not always the case that the application contains the full details of the traffic implications, but there are guidelines that should be followed.

Transport Assessments and Transport Statements.

The Department for Transport document “Guidance on Transport Assessment” gives advice to Transport Authorities and LPAs as to when a transport assessment is required. The following is an extract from that guidance document:

1.1 *Planning Policy Guidance Note 13: Transport (PPG13)* states that where a new development is likely to have significant transport implications, a Transport Assessment (TA) should be prepared and submitted with a planning application for the development. It will then be used to determine whether the impact of the development on transport is acceptable. TAs are normally produced by developers and are used by decision makers in the planning process.

1.2 A TA is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

1.3 In some cases, the transport issues arising out of development proposals may not require a full TA to inform the process adequately and identify suitable mitigation. In these instances, it has become common practice to produce a simplified report in the form of a Transport Statement (TS). There will also be situations where the transport issues relating to a development proposal are limited, and no formal assessment is necessary.

In addition, for major developments, a Travel Plan (TP) could be required to show the routes and means of travel for all people and vehicles using the site.

Furthermore, DfT give a useful table showing when Transport Assessments or Transport Statements are required:

Thresholds based on size or scale of land use

Land use	Use/description of development	Size	No assessment	TS	TA/TP
B2 General industrial	General industry (other than classified as in B1). The former ‘special industrial’ use classes, B3 – B7, are now all encompassed in the B2 use class.	Gross Floor Area (m ²)	<2500	>2500 <4000	>4000
B8 Storage or distribution	Storage or distribution centres – wholesale warehouses, distribution centres and repositories.	Gross Floor Area (m ²)	<3000	>3000 <5000	>5000

Thresholds based on other considerations

	Other considerations	TS	TA	TA/TP
1	Any development that is not in conformity with the adopted development plan			*
2	Any development generating 30 or more two-way vehicle movements in any hour		*	
3	Any development generating 100 or more two-way vehicle movements per day.		*	
4	Any development proposing 100 or more parking spaces.		*	
5	Any development that is likely to increase accidents or conflicts among motorised users and non-motorised users, particularly vulnerable road users such as children, disabled and elderly people.			*
6	Any development generating significant freight or HGV movements per day, or significant abnormal loads per year.		*	
7	Any development proposed in a location where the local transport infrastructure is inadequate. – for example, substandard roads, poor pedestrian/cyclist facilities and inadequate public transport provisions.		*	
8	Any development proposed in a location within or adjacent to an Air Quality Management Area (AQMA).		*	

Consequently, any LPA is open to challenge if it does not insist on a TA or TS for any application fitting the above criteria.

For further information see **DfT Guidance on Transport Assessment (March 2007)**

Traffic data On Planning Applications

There was a significant change to the planning application procedure that came into force in April this year. The new process is referred to as 1 APP. For further details refer **The Validation of Planning Applications, Guidance for local planning authorities December 2007, Department for Communities and Local Government.**

The new system has established a core, mandatory, national list of information required for a valid planning application and provided the ability for a local planning authority (LPA) to define its own list of mandatory, additional information.

There is a set of Validation Checklists for all types of Planning Application with which the applicant must conform. The stated purpose of these checklists is to clarify the information required by the Council in order for an application to be valid on submission and enable it to make a clear assessment of any type of planning proposal.

These lists include the mandatory additional information required by each individual LPA.

Prior to the introduction of 1APP most LPAs used form SP 101 for planning applications. Section 20 of this required an estimate of traffic implications for all commercial applications. This requirement was not carried forward into the new mandatory national list, but it has been left to individual LPAs to set their own, as they deem necessary. Only one (SCDC) has put into place policies that we would assess as adequate. Paragraph 23 of the local list includes the requirement:

“For developments likely to generate HGV traffic, details of likely numbers of vehicles and likely routes to the primary route network should be included.”

Requirements now differ between the LPAs across the county, and a check on the local application procedure is needed to ensure that the base data on HGVs is being collected.

The new planning procedure also puts much greater emphasis on the need for local consultation prior to the submission of an application. It is for the applicant to show the steps that have been taken to include the local communities in discussions about the proposals. No planning application should come out of the blue as a surprise to us in the future.

13.2 PLANNING POLICY STATEMENTS AND GUIDELINES

National Planning Policy Statements and Guidelines

The protection offered by these guidelines covers two aspects:

- § The decision whether to grant or refuse consent,
- § The conditions that need to be applied to any consent.

The most important guidance is contained in Planning Policy Statement (PPG)7: Sustainable Development in Rural Areas. Paragraph 15 states:

*“Planning policies should provide a positive framework for facilitating sustainable development that supports traditional land-based activities and makes the most of new leisure and recreational opportunities that require a countryside location. **Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced.** They should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.”*

Very clearly this puts a responsibility on a LPA to ensure that our environment (whether in areas of Outstanding Natural Beauty or not) is protected from the desecration by HGVs.

SORR has lobbied over many years for planning conditions to be applied to consents that would limit the future intensification of operations. The justification for this is contained in paragraph 17 of Planning Policy Guidance (PPG) 4:

*“Where they are disposed to permit industrial or commercial developments in residential and rural areas, planning authorities should bear in mind that subsequent intensification of the use may become unacceptably intrusive. Unless it amounts to a material change in the character of the use, **intensification cannot be controlled if unconditional planning permission has been granted.** Planning authorities should, therefore, consider the use of planning conditions or planning obligations to safeguard local amenity, where they would be an appropriate means of preventing foreseeable harm.”*

This guideline can only be interpreted to mean that such conditions **can and should** be imposed to ensure that the vital controls are provided against the adverse affects of subsequent intensification. In fact, it goes further and mentions the possibility of planning obligations in this context.

However, LPAs have consistently advised us that they are unable to apply this guideline to intensification that results in increased HGV traffic. They consider that such conditions would be unenforceable and would contravene **Circular 11/95**, in that the LPA does not have the means to apply meaningful enforcement. However, Paragraph 27 of this Circular does make specific reference to the role of the local communities in enforcement:

“where a condition is intended to prevent harm to the amenities of an area which is clearly likely to result from the development..., it will not usually be difficult to monitor, as those affected by the contravention of its requirements are likely to be able to provide clear evidence of any breaches.”

In the case of HGV traffic, local residents or parish councils are able to provide the initial anecdotal evidence to the effect that traffic levels have increased. Should a material increase in traffic levels be detected, parish councils could undertake the work required to provide a detailed record of traffic movements. This is of particular relevance in the current environment in which local councils are being encouraged to work more closely with local communities and to increase the empowerment of parish councils.

In addition, the operators can be obliged to present records of traffic accessing their site. If those records show that HGV are materially in excess of the levels stipulated on its planning consent, then a breach of condition notice could be applied. If the "bona fide" operator truly cannot correct the change in circumstance then it should apply for a change in the condition. If the balance between amenity and development is in its favour, then the number of HGV visits can be increased.

Local Planning Policies

The policies contained within the Local Plans have been (or will shortly be) thoroughly reviewed by district councils as part of the development of the Local Development Framework. The intention is that they should be rationalised and amalgamated with the national and regional policies. As an example, SCDC has completed its review and the resultant set of policies provides for stronger controls over the spread of HGVs into the countryside (see Appendix5). They cover:

- § Warehousing and storage
- § Expansion and Intensification of Employment Sites

- § Conversion and re-use of redundant buildings in the countryside
- § Farm Diversification
- § Large Agricultural Buildings and Structures

They contain conditions such as:

“...the District Council will grant permission if the following criteria are satisfied:

The ability of the local rural road network to accommodate the amount and type of traffic generated by the proposed development without seriously having an adverse affect on the highway safety and the amenity of local residents”.

It is important that when other LPAs in the county review their policies that they ensure that they too provide adequate protection for our rural roads.

A considerable part of SORR’s activities over the years has been to challenge inappropriate applications and follow up unlawful usage. We have had only limited success. However, it is clear that we are beginning to get the support of strong planning policy and guidelines to help us in the future.

Conclusions.

1. SORR must continue to present vigorous opposition to any application that would bring further unnecessary HGVs onto rural roads.
2. We have established that we have the policy guidelines to support us with this objective.
3. In the case of SCDC, we have some strong local policies and requirements for planning applications. SORR must now lobby the other LPAs to recognise the problems caused by HGVs and to adopt similar policies. Ideally, these should be standardised across the county.
4. However, these are only policies and guidelines. It is for SORR to ensure that they are taken into consideration and applied to planning applications.

14. Goods Vehicle Operator's Licences

We have attempted to persuade district and County Councils to object on our behalf to the granting of Operator's Licences in inappropriate locations. We have tried to convince central government that parish councils should be added to the list of those empowered to object. All with little success.

Despite one of their stated objectives being "protection of the environment", VOSA are not required to consider the road network around a site when deciding on an application for an Operator's Licence. More disturbingly, VOSA are not required to consider whether the site has appropriate planning consent to become an operating centre. This has to be a major anomaly since it provides no controls over the location of operating centres. We acknowledge that this can only be corrected by central government and is outside the control of SCC.

There is recourse to appeal against decisions made by VOSA to the Traffic Commissioner, and this would appear to be a more effective method for bringing some control. Unfortunately, it is only "after the event".

Conclusions

- § We should lobby SCC to make representation to central government to highlight the anomalies in the Operator's Licence process and to stress the lack of protection provided to the public by the current procedures.
- § SORR and individuals need to use the Traffic Commissioner appeal process more vigorously.

15. THE SUFFOLK LOCAL TRANSPORT PLAN, 2006 -2011

The introduction to the second Suffolk LTP expresses the approach by SCC to the lorry problems:

“On average between 2000 and 2005 we introduced three environmental weight restrictions each year. Whilst these measures have dealt with many of the pressing issues, during 2006 to 2011 we will continue to implement such measures where considered necessary. This should achieve, on average, a 10% reduction of heavy lorries. In some years, however, we may not implement any restrictions. It is not always possible to introduce traffic restriction or management schemes to deal with local concerns regarding the volume of lorries.

We will take other actions including liaison with hauliers, local businesses and parish councils. Past experience shows that this approach can reduce the number of lorries or generate data on lorry movements. Local councils have benefited from a greater understanding of local haulier journeys.

During 2006 to 2011 we expect to benefit on average 15 communities a year, depending on the level of complaint. Delivering our target will depend on good liaison with local businesses and other organisations. Planning authorities also have a key role in taking account of the affect of heavy goods vehicle traffic when considering new developments.

Risks to meeting this target include:

- § *poorly sited industrial developments may adversely affect communities. We will work with planning authorities and the business community to reduce the risk of this occurring.*
- § *non-adherence to weight restrictions and the designated lorry route network may have adverse affects. To reduce these risks we will liase closely with the Police on enforcement and the industry on lorry routing.”*

15.1 Quality of Life issues

- § *“The size and speed of vehicles means that communities can experience intimidation and a perceived, if not real, lack of safety*
- § *“People living in Suffolk place a high value on their quality of life and want to see it maintained and improved. People living in rural communities are very concerned about the effect of speeding traffic and the high numbers of lorries. The absence of pavements alongside roads in many of these communities is an important issue.”*

It is clear from theses two extracts that SCC considers the problems to be primarily “quality of life” issues rather than matters of safety. As discussed in Section 3, effort is concentrated on the “Killed and Seriously Injured” sites.

It is our experience that SCC is made aware of only a very small percentage of accidents on rural roads. SCC does simply not record data on the very numerous minor accidents (sometimes involving injury). Consequently, they do not have measures and base data on which to formulate their decisions. The HGV Incident Reporting procedure must be used to correct this.

Although the main emphasis is on KSIs, the LTP gives token recognition to some need for some general safety improvements:

“Our consultation shows that there is a big demand for minor schemes across the county to deal with low accident sites or near-miss sites. We have allocated £758,000 in 2006/07 for schemes that meet quality of life issues which includes alleviating community concerns about safety.”

This is not a recognition that these roads are dangerous. The wording is significant: “alleviating community concerns about safety”. Also, this sum is for all quality of life issues, not just safety. For the number of roads affected this is a totally inadequate amount and as traffic increases in line with forecasts, the concern regarding safety will also increase. The budget will not be available to alleviate more than a handful of the genuine safety problems. We do not know whether this sum was spent or what sums have been allocated in subsequent years.

The LTP does recognise the need to improve the provision of rural pavements:

“By 2011 we aim to provide 7.5km of new rural pavements connecting communities.”

Unfortunately, the majority of the roads affected by lorries are too narrow for the construction of footpaths and it would need considerably more than 7.5km of footpaths to mitigate these problems.

15.2 Lorry Intervention Schemes

The major thrust of the first LTP was directed at lorry intervention schemes. That plan did see the introduction of a number of routing and weight restriction initiatives. There is no feedback on the effectiveness of these initiatives.

The section of the second plan relating to HGV traffic in rural areas states:

“Suffolk is primarily a county whose economy has a strong rural base, including agriculture which has to be serviced largely by commercial vehicles. Heavy goods vehicles and light van traffic volumes have increased in the last five years. More lorries can cause a number of quality of life concerns particularly around noise, vibration, safety, air quality and highway damage in rural communities.”

We plan to monitor increases in volumes of heavy lorries. This will help us decide where to introduce schemes to reduce their impact.

Two specific actions are proposed:

§ *Environmental weight restriction schemes, which restrict lorry access. The number of these will be recorded and used to measure reduction in number of heavy goods vehicles for Target L3a.*

§ *The recording and follow up action of notified incidents using a publicly available incident reporting form. The number of reported incidents, which have resulted in action taken, will be recorded to measure the number of communities benefiting for L3b.*

The targets set for the effectiveness of lorry intervention schemes undertaken are:

“Target: L3a

An average of 10% reduction in heavy goods vehicles as a result of schemes which restrict access where implemented in that year.

Target L3b

15 communities a year benefiting from action taken to reduce the effect of lorry traffic.”

Conclusion

- § Both LTPs have concentrated efforts on the management of problems and, in the longer term, this is cannot solve the problems. There are only so many times that we can “spread the misery”.
- § We welcome any money being directed towards minor schemes across the county to improve safety, but we need a clearer picture of how much is being spent and where.
- § We also welcome the proposals for closer working with local communities on these issues. The solutions can only result from a co-ordinated campaign that bring together councils, freight operators, the local communities and campaigning groups.
- § The Policy Development Panel (see Section 16) has proposed additional and strengthened the policies relating to HGV traffic. These represent a move to tackling the root causes of the problem rather than the symptoms.

16. SCC POLICY DEVELOPMENT PANEL ON LORRY RELATED ISSUES.

In October 2007, SCC undertook a fundamental review of its policy relating to lorry traffic in the form of a Policy Review Panel. SORR gave evidence to this Panel at two meetings and provided copies of the 2007 report. The Panel's recommendations were adopted by SCC Cabinet on 7th October this year.

It was decided that the second LTP would not be amended but, instead, there would be a package of additional guidance and initiatives to supplement the Plan. These address many of the points raised in this report.

1. Drive up Awareness of the Lorry Route Network

Contact trade bodies and hauliers to raise awareness of the Suffolk Lorry Route Network.

2. Incident Reporting Procedure.

Re-launch the HGV Incident Reporting Procedure in liaison with SALC and offer new on-line facilities for using the Procedure.

3. Incident Reporting Procedure – Feedback

Provide information on the Council's website about action taken in response to reported HGV incidents, including:

- § number of hauliers contacted,
- § enforcement of weight restrictions
- § number of hauliers prosecuted.

4. Zonal Lorry Management.

Carry out a review of the implications of zonal lorry management and reclassifying county roads taking into account:

- § government grant funding,
- § the impact on the surrounding road network,
- § access to and effectiveness of, routing HGVs onto strategic road network.

This review should take the form of a pilot study within the A140, A1120 and A12.

5. Jointly Funded Traffic Management Schemes.

Write to parish councils, through SALC, advising them that they can apply for consideration of jointly funded traffic management schemes to mitigate the effect of lorry movements on communities

6. Overnight HGV Parking Facilities.

Continue to work in relation to the HGV Parking Action Plan, recognise its importance in encouraging the establishment of overnight parking facilities, and ensure that resources are adequately allocated to this work.

7. **Planning Policies**

Work with District Councils in Suffolk on the development of suitable policies within their Local Development Frameworks. Such policies should acknowledge the need to take into account:

- § the adequacy of the road network,
- § other commercial traffic
- § incremental increases in HGV traffic

when considering any new applications or applications for expansion for non-agricultural uses in rural locations.

8. **Planning Conditions.**

Review the types of conditions it recommends to planning authorities, particularly in respect of intensification of use which generates increased HGV movements.

9. **Goods Vehicle Operators Licences.**

Include a link on its website to the VOSA website to provide an easy way for parish councils to access information about new applications for, and decisions on, Goods Vehicle Operators Licences.

10. **Restricting HGVs to the Near Side on Dual Carriageways.**

Liase with the Highways Agency on its trial of restricting HGVs to the near side at the western end of the A14, due for completion later this year. Based on the outcomes of this trial, the council should review the situation in Suffolk.

11. To improve the impact of national policy or current legislation, the PDP recommends that the Council should:

a) **Satellite Navigation Systems**

Lobby the Government and write to the relevant regional and national agencies in support of the development of a UK freight satellite navigation map.

b) **Goods Vehicle Operators Licences.**

Lobby the Government for a change in responsibilities for granting Goods Vehicle Operators' licences, for example, to enable planning authorities to become Goods Vehicle Operator licensing offices with the ability to refuse an application if there is inadequate planning consent for use of the site as commercial premises;

c) **Regional Assembly's Freight Strategy.**

Request the East of England Regional Transport Forum to forward to the East of England Regional Assembly the recommendations in paragraphs a and b and the issues identified by the PDP so that they can be incorporated in Regional Assembly's emerging freight strategy.

12 **Review of Progress**

So that the Cabinet can review the effectiveness of these actions and progress in implementing them, the PDP recommends that the actions are monitored and that a further report is submitted to the Cabinet in October 2009.

Conclusion

1. These initiatives represent a critical change to policy. It is for SORR and the communities affected by HGV traffic to give their full support to these.
2. The implementation and effectiveness will be reported back to Cabinet. This should mean that:
 - § effort will directed towards achieving these proposals,
 - § we will have feedback,
 - § we will have the opportunity to have our say

17. SUMMARY

It is very pleasing to record that since our last report, substantial progress has been made on many aspects.

1. In our 2007 report, we criticised the LTP for concentrating effort onto the management of the problems as they arose at the expense of tackling the root causes. There are now some positive measures that address this criticism.
2. Similarly, we were critical of Local Planning Authorities and their reluctance to give due consideration to the impact of HGVs on the surrounding road network. We have seen some change in attitudes and strengthening of policies. We need to see whether the words in policies are converted into actions.
3. We reported that there appeared to be little evidence of the essential co-operation and close working between councils at District or County level required to tackle the HGV problems successfully. We recommended that a fundamental change was required in the ownership of the problem. It could not continue to be categorised as a problem belonging solely to the Transport Authority but was a problem to be jointly owned and addressed by SCC and the Districts. A change to shared ownership would encourage the inter-council dialogue that has been absent to date. It is to be hoped that the work on the PDP has addressed this.
4. The anomalies regarding Operator's Licences has been recognised and pressure will be brought to bear on central government to correct these.
5. We will have an effective, user-friendly incident reporting procedure. It is vitally important that people across the county use this to its full effect. With the right publicity, usage of the procedure will increase across the county. It is also hoped that SCC has realised the amount of extra work that will result from this improvement and will support it accordingly.
6. We are pleased to note that some very positive action is being taken on the sat-nav problems, but recognise that there are no quick solutions.

There remain a number of areas that have not been addressed satisfactorily:

Safety Issues

Safety on these roads (and in particular, initiatives to make them safe for pedestrians and cyclists) still needs a higher profile and more positive action to bring about improvements. At present, the money is not there to do much. Working with parish councils to develop joint schemes will bring some benefits and this aspect should be strongly promoted. In the longer term, we would hope that money saved elsewhere could be diverted into these schemes.

Maintenance Costs

There are no proposals to tackle the inordinate cost of maintaining our rural roads. We need complete visibility of the reasons for the repairs and the real costs so that the full impact of HGV traffic can be quantified. There is growing dissatisfaction

throughout the county that large sums are being spent on road repairs when little is being done to stop the source of that damage.

Enforcement.

There are no radical proposals regarding enforcement. With no effective means of enforcement, a scheme of advisory routes and weight restrictions cannot, realistically, be effective in the reduction of lorries on rural roads. The Incident Reporting Scheme could result in improved enforcement, if complaints were followed up vigorously. It is noted that the charging scheme in Central London appears to operate without any great difficulties. It does not seem that great a leap to requiring permits to use rural roads and enforcing this measure through either GPS tracking or cameras that can record transgressors' registration numbers, feeding into a computerised compliance programme that automatically issues citations.

APPENDIX 1

**SAFETY SURVEYS –
CONCLUSIONS & RECOMMENDATIONS**

Appendix 1.1	Coddenham (B1078)
Appendix 1.2	Debach (C309)
Appendix 1.3	Grundisburgh (B1079)

APPENDIX 1.1 Coddenham (B1078)

CONCLUSION

The current situation is dangerous to **all** concerned. There can be few worse situations anywhere in the country.

Volumes of PSV LGV and HGV traffic were lower than anticipated and in fact represented only 3.29% of traffic surveyed, however, these are the vehicles, by the very nature of their size that cause the majority of problems.

A radical solution must be found, which undoubtedly will have financial implications, but failure to react will sooner or later result in somebody being seriously injured or killed. In addition, the current situation is becoming intolerable for the residents and the village is slowly dying as more and more people leave for quieter and safer environments.

Those within the SCC with the capability of solving the current situation must ensure that positive changes occur sooner rather than later.

RECOMMENDATIONS / SUGGESTIONS FOR IMPROVEMENT

SHORT TERM

- Village entrances to be “gated” with improved large signage emphasising speed limits.
- Speed limits to be displayed throughout the village – electronic flashing signage to be considered, together with the use of red road marking material, to highlight entering a controlled zone.
- Installation of Speed cameras.
- Additional / improved signage to indicate and warn drivers of the Western Route for HGVs.
- Speed limits to be enforced.
- Higher police profile / presence.
- Enforcement of the Western route for HGVs.
- Regular hauliers using the route to be identified contacted and invited to see first hand the problems their drivers face.
- Local “users“ of LGVs, HGVs e.g. Debach Enterprises, Gressingham Ducks, to be asked to distribute to all drivers visiting their sites, a leaflet advising of the correct lorry routes through the area.
- All Suffolk based hauliers to be advised of the difficulties of travelling through Coddenham – have they risk assessed the route?

MEDIUM TERM

- 7.5 tonne Weight restriction to be applied to village from eastern side.

LONG TERM

- All non-village heavy goods vehicle traffic should not be permitted through the village of Coddenham. The Suffolk County Council preferred ferry route network using the A12 and A14 must be enforced.

APPENDIX 1.2 Debach (C309)

CONCLUSION

Debach Enterprises, primarily through the storage of the polyethylene beads and associated activities of the other industrial units certainly generate significant volumes of HGV and LGV traffic both from the NW route through Debach and from other directions which adversely impacts on many of the surrounding villages. The outgoing HGV traffic flow is essentially stable, with distribution to plastic extrusion plants in bulk chemical containers. The volume of incoming HGV traffic (basically containers) is more variable, peaking when the containers of polyethylene beads arrive at Felixstowe docks.

Our (Freight Transport Association) survey was undertaken on a day when the majority of traffic to the Debach Enterprises' site comprised bulk chemical containers. Whilst it was previously considered that the majority of the HGV traffic was attributable to the storage activity at Debach Enterprises, on the day of the survey, the majority of the traffic was generated by the activities of Gressingham Foods.

The survey indicates that commercial vehicles accounted for 11.58% of the total traffic flows through the village between the hours of 07.15 and 17.15. This is an exceptionally high percentage given that Debach is a rural village serviced by minor rural roads, which were not designed/built to sustain that level of commercial traffic.

Our research indicates that in 2003, the C309 was designated part of the lorry routing scheme by the Suffolk County Transport Authority. This was a direct consequence of the increase in HGV traffic generated by the operations of Debach Enterprises and Gressingham Foods. The previous recognised route had been the B1079, through the village of Grundisburgh which permitted two-way movement of HGV traffic. The volume of HGV movements increased to a level where regular blockages were occurring on the pinch points along this road and were causing serious problems for local residents. Accordingly, it was decided to introduce a one-way circulatory system with lorries from the A12 being directed along the C309. It was accepted that this was a compromise solution since the road was not ideal for the purpose.

Some sections of the road are straight and of sufficient width to allow HGV traffic to pass in one direction. There are, however, numerous sections that are narrow with several very sharp bends. In particular it was noted that the section from the A12 up to the Bredfield Pump has four almost right-angle bends and the section outside Woods Cottage in Debach has a sharp "dogs leg" bend. At each of these points the road is just adequate for a HGV and car to pass. Visibility is severely restricted or completely blocked on these bends. In addition, there are other sections that just allow sufficient width for a HGV and car to pass safely, provided that both vehicles keep very close to the verges and travel at an appropriate speed.

There is a 7.5 tonne weight restriction from the junction with Looms Lane and the A12 that prohibits HGV travel in an easterly direction. Buses are exempt from this restriction, these regularly use this road in both directions.

We understand that the weight restriction also does not apply to the large JCB tractors (width 2.5 metres) and trailers, we are advised that these are used by Gressingham

Foods to transport duck waste from the many duck rearing units in the area to their site in Looms Lane.

In addition, the road is used regularly in both directions by the local farming community for the movement of agricultural equipment. It would be impossible for many of these vehicles to pass an oncoming HGV without using the verges or the frontage of the houses that abut this road.

Thirty m.p.h. speed restrictions are in place through some of Bredfield village and some of Debach. The remainder is national speed limit. Crucially, there is no restriction on part of the road to the West of Looms Lane on which two-way HGV traffic is permissible.

None of the roads have footpaths or cycle tracks adjacent to the road, nor, practically, is there adequate space for them to be installed.

The timescale for the investigation stage of this survey did not allow us to monitor, in detail, the perceived danger points. However, there is extensive evidence that the roads/verges are not being maintained as the damage being caused by two way vehicle conflict is clear for all to see. Erosion of the natural barrier between the carriageway and hedgerows/premises is in evidence along vast stretches of the C309.

The identified pinch points give rise to significant concern as often dangerous reversing manoeuvring have to be undertaken by drivers of maximum length vehicles, this practice is unsafe for pedestrians, other road users and extremely stressful for the drivers themselves, and must be avoided at all costs.

There is also a substantial pool of anecdotal evidence from the residents of the local villages that provides a clear insight into the problems being encountered on a daily basis. These include:

- Car drivers being forced onto the verges,
- Lorries exceeding the speed limits (particularly when negotiating bends),
- Lorries ignoring the one-way restriction,
- Delays caused by blockages when lorries meet buses, large tractors or other lorries travelling in the wrong direction.
- Vehicles falling into ditches,
- Reluctance to walk or cycle along the road because of the inherent dangers.
- Regular occurrence of scrapes and dents and “near misses”.
- Local drivers have become aware of the hazards and the particular danger spots. They therefore drive with due caution in these areas. Even so, they have the constant fear of meeting lorries on the wrong side of the road
- The more serious accidents usually occur when drivers who are unfamiliar with this road and who do not expect to meet oncoming lorries.

Although anecdotal evidence, for which hard proof cannot be provided, it is consistent with the findings of our survey.

Note

There is a belief that rural roads are safer places to drive – but they are wrong. More than half (53%) of all fatal crashes occur on rural roads. In 2004, 12,728 people were killed or seriously injured on these roads in Great Britain. To date, there has been one fatality on this road. It is not acceptable to allow an ever-increasing volume of HGV

traffic to use a totally unsuitable road simply for the sake of expediency. Unless serious consideration is given to the consequences of the decision to route HGVs along the C309, with its intrinsic dangers, the fatality statistics will increase.

RECOMMENDATIONS /SUGGESTIONS FOR IMPROVEMENT

SHORT TERM

Every effort must be made to reduce the volume of HGV traffic along this road. This must include taking measures to ensure that Debach Enterprises cease their unauthorised usage of the airfield site for the storage and distribution of polymer beads as quickly as possible. A further significant improvement could be achieved if Gressingham Foods were to find alternative and more appropriate sites for the storage of the waste from the numerous duck rearing plants around the area.

- The road should have a one-way, 7.5 tonne weight restriction for its entire length (i.e. the current restriction should be extended up to the junction with the B1078.)
- The thirty m.p.h. restriction should apply throughout the villages of Bredfield and Debach.
- Serious consideration should be given to the introduction of width restrictions to supplement or replace the weight restrictions.
- The Planning Authority (Suffolk Coastal District Council) should ensure that there are no further extensions or enlargements of existing operations, nor the creation of any new operations, that will generate increased traffic along this road.
- Police to have a higher presence in the area and to enforce both the speed and weight limit restrictions.
- Installation of Electronic flashing signage to help enforce speed limit.
- The installation of traffic calming measures to reduce the speed of cars and other smaller vehicles. This could be as an integrated part of the “Quiet Lane” proposals currently being developed by the Debach Village Meeting

MEDIUM TERM

- The decision to route HGVs along the C309 to ease problems elsewhere must be regarded as a less than ideal solution, particularly in view of the characteristics of this road. The Suffolk County Transport Authority should undertake a thorough, public review of the impact of this routing decision in the light of four years’ experience and act on its findings.

LONG TERM

- The aim must be to encourage the relocation of operations that generate high volumes of HGV traffic to sites adjacent to the main trunk network. This would not remove all HGV traffic from the C309 since local access would still be required for activities essential to the maintenance of the rural economy. However, it would ensure that the safety of the road was restored to a level to which the local residents are entitled to enjoy.

APPENDIX 1.3 Grundisburgh (B1079)

CONCLUSION

The B1079 is (as with all of the adjoining B/C roads in the area) unsuitable for the volumes of traffic they are currently carrying. Problems occur with goods vehicles, particularly hgv's because of their size and the difficulty experienced of physically passing each other on the narrow road, particularly at the pinch points.

There is significant evidence that attempts have been made to address the safety issues along this road in terms of signage, road markings and raised kerbs, however it appears inherently unsafe for lorry traffic and cannot be realistically regarded as an acceptable lorry route.

Throughout its length there are clear indications of damage to verges and kerbs and of skid marks caused by emergency stops.

It is difficult to see how the road can be improved without incurring an unjustifiable amount of work and expense.

There are no solutions to the problem in terms of routing or weight restrictions and the road should not be carrying two way hgv traffic. To make the Lorry Route restrictions mandatory rather than advisory would result in increasing traffic along the C309.

The only possible way of easing, but not solving the problem is to reduce the traffic generated by the business sites.

RECOMMENDATIONS/SUGGESTIONS FOR IMPROVEMENT

Possible actions could be:-

- Restrict the nature of operations at Debach Enterprises [SCDC to enforce its recommended action published in its report dated March 2006]
- Limit the activities at Gressingham Foods [as detailed in the Debach report] together with ceasing the movement of duck waste from surrounding rearing units, for storage at Looms Lane
- Enforcement of the Official Lorry Route
- Strict control to prevent further activities which would lead to the introduction of additional HGV/LGV traffic

APPENDIX 2

**Summary of the SORR Survey Undertaken in Connection
With Debach Enterprises Complaint to the Ombudsman**

Suffolk Coastal District Council Ombudsman Complaint	
Schedule of Complainants	
Table of Results:	
Total number of Complainants:	320
Total number of Households:	186
Average Years in Residence	16.60
Geographical distribution:	
Grundisburgh & Culpho	54
Hasketon	30
Debach	47
Clopton	27
Otley	15
Hemingstone & Coddenham	62
Bredfield	37
Burgh	23
Others:	25
(Playford, Cretingham, Melton, Great Bealings, Woodbridge, Wickham Market)	

APPENDIX 2 (cont)
Analysis of Complaints

		No.:	%-age
Property*:			
	Devalued**	105	56.45%
	Structural Damage**	44	23.66%
Loss of Amenity:			
	Noise	240	75.00%
	Vibration	182	56.88%
	Visual Intrusion	174	54.38%
	Air Pollution	185	57.81%
Negative Effect on Community and Enjoyment of Rural Life			
		266	83.13%
Safety (car driver):			
	Forced onto Verge	296	92.50%
	Vehicle Damage	220	68.75%
	Near Misses	236	73.75%
	Delays caused by HGVs	293	91.56%
	HGVs Exceeding Speed Limits	191	59.69%
Safety (pedestrian/cyclist):			
	Taken evasive action	233	72.81%
	Reluctant to walk or cycle	274	85.63%
	Threatened/intimidated/frightened	224	70.00%
Damage to Road Network:			
	Affected by road surface damage	149	46.56%
	Adversely affected by road repairs	163	50.94%
	Your roadside damaged	246	76.88%
	Measures to protect your property	87	27.19%
NOTES			
*Only one property devaluation or damage recorded per household			
**As a per cent of households			

APPENDIX 3

ACCIDENT AND SAFETY DEFINITIONS

Road Use Classifications

Road users are classified as pedestrians, pedal cyclists, users of powered 2-wheelers (which may be further separated into mopeds and motor cycles), car drivers, car passengers, bus drivers and passengers, goods vehicle drivers and passengers, and others (horse riders, drivers of farm tractors, etc).

Accidents

In Great Britain this is defined as an incident which involves personal injury occurring on the public highway (including footways) in which at least one road vehicle or a vehicle in collision with a pedestrian becomes known to the police within 30 days of its occurrence.

Fatalities

Defined in Great Britain as human casualties who sustain injuries which cause death in less than 30 days (before 1954, about two months) after the accident. Confirmed suicides are excluded.

Injuries

Defined in Great Britain as an accident involving human injury or death. Serious injury is an injury for which a person is detained in hospital as an "in-patient", or various defined injuries whether or not detained in hospital, and slight injury as an injury of a minor character such as a sprain, bruise or cut which are not judged to be severe. This includes injuries not requiring medical treatment.

Safety: Data Definitions and Caveats

Casualties of road accidents are classified by severity as killed, seriously injured and slightly injured. These are often grouped as;

- § KSI (killed and seriously injured),
- § All casualties (killed, severely injured and slightly injured),
- § All injuries (excluding fatalities)
- § Slightly Injured

APPENDIX 4

THE LORRY BAN IN LEICESTERSHIRE

Press release from Leicestershire County Council in 2005.

Leicestershire County Council - Getting heavy with lorries

LORRIES have now been banned from minor roads across the County.

In the first move of its kind in the country we have completed a programme of blanket weight restrictions on minor rural routes – so that lorries can only use A and B roads, unless they are making a delivery.

In other areas, bans of this kind have been introduced piecemeal, but we have introduced a County-wide network of routes. We have also down-graded some B-roads in the west of the County and improved signs to help lorries keep on appropriate routes.

Nicholas Rushton, Deputy Leader and Cabinet Member for Highways said: “This is proving a great relief for many residents in the County by keeping lorries away from their streets and villages. The move also has environmental benefits and will help to cut the costs of maintaining and repairing minor rural roads.”

The police are using modern camera technology to help track down and pursue offenders. In addition, we are working with the suppliers of satellite navigation systems to help give lorry drivers high quality information about the restrictions. Forty-two per cent of people in the UK believe lorries should be restricted to trunk roads except for access. Sixty per cent believe high street retailers should be encouraged to use smaller lorries for deliveries.

Press release from Leicestershire County Council in 2006:

Relief for minor roads

MODERN camera technology is being used to help track down lorry drivers using unsuitable roads in the County.

Until the end of October, action was taken against 34 lorry drivers following reports by members of the public.

This is helping to enforce our lorry control strategy, which keeps A and B roads available for all traffic, but has restricted most other roads in rural areas. There are still some instances where minor roads may be used by heavy lorries. The 7.5 tonne weight restriction does not apply if lorries are making a delivery into an affected area.

To report problems, e-mail: weight.restricted@leicestershire.pnn.police.uk or call: 0116 222 2222.

APPENDIX 5

Suffolk Coastal's Planning Policies Relevant to HGV Traffic

DC Policy 10 - Warehousing and storage

Proposals for warehouses and storage depots, except where required for local distribution purposes, and for container compounds and handling areas, will be restricted to sites identified in the LDF as being suitable for the use. Outside these sites, such uses will not be normally permitted.

Specific provision will be made for land required to support the needs of the Port and its users

Policy context

National: PPS4

Local: Saved policy AP53

DC Policy 11 - Expansion and Intensification of Employment Sites

When considering proposals to expand and/or intensify existing employment sites consideration will be given to:

- § Whether the scale of the development would cause overriding problems for transport, housing, provision of services, impact on neighbouring residential uses, or the conservation of the environment
- § **The material harm to living conditions of local residents as a result of increased traffic movements generated by the development**

Where sites are in primarily residential areas and proposals would cause overriding problem, the District Council will seek to assist in identifying more appropriate locations.

Policy Context

National: PPG4 & PPS7

Local: Saved policies AP48 & AP49 Rural Economy.

DC Policy 12 - Conversion and re-use of redundant buildings in the countryside

In considering proposals for the re-use and conversion of buildings in the countryside, the District Council will grant permission if the following criteria are satisfied:

- § The design aspects, particularly the scale and character, are suitable for its particular rural location and setting
- § Any alterations would respect the character of existing buildings particularly where they are of traditional design
- § **The ability of the local rural road network to accommodate the amount and type of traffic generated by the proposed development without seriously having an adverse affect on the highway safety and the amenity of local residents**
- § Evidence in the form of survey work is carried out where required by the Suffolk Wildlife Trust to safeguard legally protected wildlife species and

their habitats and adequate provision is made for any which might be found.

- § In the case of an employment use, the business should be small, and preferably provide jobs and /or services for the local community. Where the buildings to be converted are adjacent or closely related to a settlement identified under the settlement hierarchy as having a physical limit boundary, such proposals will be looked upon more favourably.

Policy context

National: PPS7

Local: Saved Policies AP71, AP72, AP73, AP74 & AP75,
SPG1: The future use of redundant buildings in the countryside

DC Policy 13 - Farm Diversification

The District Council will support the diversification of farm enterprises, subject to the following criteria:

- § The proposal should be a use and of a scale which relates well to the settlement hierarchy;
- § **The use proposed should have regard to the immediate road network and accessibility to the primary road network, and should not lead to traffic movements that would prejudice highway safety, or the free flow of traffic, or materially harm the living conditions of local residents;**
- § The application should include details to show how the diversification scheme contributes to the viability of the farm as a whole, and / or its continued operation;
- § Where relevant, the proposal retains existing, or provides additional or alternative employment and / or is for community purposes;
- § It does not involve the provision of new residential development unless consistent with other policies in the Local Development Strategy.

Policy Context

National: PPS7

Local: Saved policy AP70
SPG1: The future use of redundant buildings in the countryside

DC Policy 14 - Large Agricultural Buildings and Structures

Proposals for large agricultural buildings and structures for livestock and buildings for bulk storage will need to ensure that:

- § **it can be demonstrated that the local road system is adequate and the site is well related to the primary road network and does not compromise highway safety or the free flow of traffic;**
- § in the case of buildings for livestock, proposals includes appropriate measures for the disposal of effluent;

- § in the case of new structures to accommodate large scale crop-based industrial activity, it will only be considered in the Countryside when it can be demonstrated that locations within General Employment Areas or other existing employment sites within defined settlement centres would have a greater visual or traffic generating impact. New structures to accommodate food preparation will only be considered in the Countryside where it relates to the agricultural unit on which it is grown.
- § In exceptional circumstances, buildings for large buildings for food production units and bulk storage may be permitted in the Area of Outstanding Natural Beauty and Special Landscape Areas where careful siting, design, and use of materials result in no adverse impact on the landscape.

Appendix 6

SCDC's Local Requirements for Planning Applications.

Transport Assessment

23 Where developments will have significant transport implications, Transport Assessments should be prepared. The coverage and detail of the Transport Assessment should reflect the scale of development and the extent of the transport implications of the proposal.

For small schemes, the Transport Assessment should simply outline the transport aspects of the application.

For development likely to generate HGV traffic details of likely numbers of vehicles and likely routes to the primary route network should be included.

For major proposals, the assessment should illustrate accessibility to the site by all modes and the likely split of types of journey to and from the site. It should also give details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.

These assessments enable local planning authorities better to assess the application and provide a basis for discussion on details of the scheme, such as the level of parking, the siting of buildings and entrances, and the need for further measures to improve access arrangements to the site.

Details of any firm proposals to improve the access to a site (particularly where included in the local transport plan) should be taken into consideration when assessing the suitability of a site for development. DfT and DCLG are in the process of preparing guidance on the preparation of Transport Assessments.

There is also a specific reference to traffic implications included in the section on the re-use of redundant barns:

4.5 Barn conversions

An estimate of the number of vehicles (cars, vans and lorries) which will be using the site and details of access and parking arrangements