

BRIEFING REPORT TRANSPORT STRATEGY

SUBJECT:	Eye HGV Concerns
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DATE:	7 th July 2020
PURPOSE	Information

SUMMARY OF MAIN POINTS:

The County Council (the Council) has received numerous emails relating to heavy goods vehicles on a range of topics in the Eye area. This briefing note provides clarity on the following main themes that have arisen from the correspondence received recently, predominantly concerning heavy goods vehicles in the town and surrounding area.

- Babergh and Mid Suffolk Joint Local Plan
- Planning Applications
- Road Safety
- Lorry Watch and Enforcement of Breaches
- Public Health

Babergh and Mid Suffolk (BMSDC) Joint Local Plan

The Council is awaiting an update from Babergh & Mid Suffolk District Council on progress of the new Local Plan and the revised timetable. The most recent information received was that an amended timetable is to be presented to members in July. The Council will have the opportunity to respond to the detail of the plan at the next stage of consultation Reg 19. This will include responses relating to land use and highway impacts.

The SCC response to the Reg.18 local plan in September 2019, is provided below.

"Concerns have been raised by local communities and members of Suffolk County Council around the growth of poultry farming, processing and transport in the northern parts of Mid Suffolk. The impacts of which are affecting local communities, including towns and villages such as Eye and Stradbroke.

Whilst the resultant economic growth should be welcomed, the county council would welcome consideration to specific policies that could potentially manage the adverse impacts on a cumulative basis. It is appreciated that this is challenging, given that the economic activity supports rural employment and some of the development usually falls under permitted development. Potential routes for the councils to consider is the removal of permitted development rights in certain occasions and more detailed assessment (and resultant mitigation) of impacts on communities."

The Council was advised by the Corporate Manager for Strategic Planning at BMSDC on the 19th June that they are considering the responses made to the Joint Local Plan first stage consultation in 2019 in respect of concerns regarding the transport movements associated with poultry farming, as BMSDC develop the next iteration of the Joint Local Plan. Alongside this, BMSDC have set up a Poultry Panel, this met in January 2020 the notes of the meeting are attached separately.

Planning Applications

As a statutory consultee, the Council provides impartial professional advice to the Local Planning Authority (LPA) to help them make a balanced decision on planning applications. The LPA is not required to include the advice provided in the response and the final planning decision may be made without recommended highway mitigation.

It should be noted that many of the direct and related poultry industry development applications come forward as agricultural permitted development, ie the expansion of existing business use. As such it is not possible to assess the cumulative impact of these sites and they may not be identified specifically within the local plan. From the planning applications to date, the sites individually result in low levels of increase in HGVs, accepting that for delivery of chickens to the processing site at Eye, there are higher levels approximately seven times a year.

The Council, as the highway authority, when making a decision on the level of impact on the highway from new developments, will take into account a number of issues such as:

- the type of development
- types of vehicles and expected routes for HGVs
- hierarchy of road
- levels expected traffic volume and affect it has on existing
- extent of existing congestion (such as length of queues and period of time)
- consider road safety (vehicle speeds, accident data)
- history of complaints
- sustainable transport such as footways, cycle and public transport links

Development Management Engineers have to abide by the regulations and guidance set out in the National Planning Policy Framework (NPPF). This states that '*Decision-makers at every level should seek to approve applications for sustainable development where possible*'. Therefore, even if applications are unpopular with the public, unless there is detrimental effect on the highway which cannot be mitigated, there is no reason for SCC highways to object, however, the County Development Management Team are aware of sensitivities in the area and will take this into consideration in future responses.

The poultry processing site is on Eye airfield, this can be accessed from the A140 or via two routes through Eye. Therefore, although each development site has a relatively small number of additional HGV trips, some of the trips converge on Eye.

The A140 is the obvious choice for accessing the processing plant, one of the reasons that this site was chosen to replace the Weybread site. However, the Bedingfield and proposed Thorndon sites cannot reasonably access the A140 due to an existing environmental 7.5t weight restriction at Thorndon. Therefore, they use the local roads which route through Eye. There are existing environmental 7.5t weight limits within Eye limiting the routing of HGVs to the B1117 from the east and Lowgate St from the south.

The MLM report sent to Councillor Andrew Reid has been shared with the Development Management Team & County Planning Officers.

Many of the applications that members of the public are writing to SCC about are historical and therefore the council cannot retrospectively require mitigation for these. Going forward, the Development Management Team will ensure that further applications relating to the poultry industry, including issues such as routing, will be robustly considered as allowed for in the regulations and guidance.

Correspondence relating to new applications should be sent to planning@baberghmidsuffolk.gov.uk or planning@suffolk.gov.uk

Road Safety

Officers from the Safety and Speed Management Team have met with Councillor Guy McGregor and Eye Town Council. They are leading on the progression of potential new Traffic Regulation Orders (TROs) as requested by Councillor McGregor, the MLM report commissioned by Eye Town Council will be used as the basis of the information to support this work. Changes will be subject to the usual processes of design, consultation and funding must be sourced before any new TROs can be implemented. If funding is sourced and any objections received during the advertising stage of the proposed TRO process are not upheld, the timescales for implementation of the TRO and associated physical measures are between 6 and 12 months approximately.

It should be noted that further HGV restrictions in Eye will result in additional mileage for HGVs from those businesses to the south and east of the town and may result in increased HGVs through other local villages, moving the problem, not solving the problem. Therefore, whilst considering new restrictions, engineers will need to consider the local and wider impacts of where displaced HGV's will travel on the network.

An order has been raised with Suffolk Highways to provide a cost estimate to undertake the design and consultation.

Lorry Watch and Enforcement of Breaches

Eye is a Lorry Watch area, one of eight currently in place in Suffolk. Lorry Watch zones can only be considered where there is a weight restriction already in place, parts of Eye have existing 7.5t weight limits, except for access.

A Lorry Watch scheme operates in the following way:

1. Local trained observers note details of vehicles that may be misusing a restricted route
2. A report is sent to Suffolk Trading Standards
3. Suffolk Trading Standards confirm the vehicle weight and registered keepers of the vehicle
4. Investigations are made with the registered keeper and driver of the vehicle
5. Action is taken in accordance with the [Enforcement Policy](#)*
6. Feedback is provided on a quarterly basis to Lorry Watch zones.

*Appendix 1 of the Enforcement Policy outlines how and when enforcement of breaches can be carried out.

Trading Standards can only respond to reports of breaches that are submitted using the official Lorry Watch reporting process. Concerns about speeding must be raised with the Eye Safer Neighbourhood Team at Suffolk Police Eye.SNT@suffolk.pnn.police.uk

We have consulted with Suffolk Constabulary, who have no further comments or feedback about HGV movements in the town at the time of writing this report.

Trading Standards received four reports in 2015 after which the scheme lapsed. Further training

for new volunteers was delivered in December 2019 at the request of Eye Town Council. There is one new observer with further training packs sent to those who could not attend but wish to register as a volunteer. Without sufficient volunteers the scheme is unlikely to operate successfully.

Suffolk Highways has received 12 HGV incident reports in the Eye area since 2017, primarily regarding HGV's traversing Church Street/Broad Street. Some have noted damage to lamp columns and mounting footways. Responses to these reported incidents have directed the public to report these to the Lorry Watch scheme, run by Trading Standards for potential enforcement of vehicles breaching the current restrictions.

It is recommended that, rather than revert to use of local community social media channels to discuss these concerns, which are not actionable by the County Council, it is strongly advised that all concerns are reported using the correct channels. This can be done by using the pages on the Council website <https://www.suffolk.gov.uk/roads-and-transport/lorry-management/report-a-heavy-goods-vehicle-incident/> or to the local Lorry Watch group. We would also advise the public to ensure that their concerns are presented to their town or parish council so that they are included in the community review planned for 2021.

Safer Spaces

Some correspondents have included concerns for safe space for pedestrians in the town centre, due the narrow footways. With social distancing an ongoing requirement across the country, there may be a need for additional work to be carried out to enable this.

To ensure appropriate safety measures can be put in place for communities across Suffolk, the County Council is working closely with its local Authority partners, Town Councils and the business community to develop guidance and advice on how safe, social distancing measures can be maintained as shops and businesses begin to re-open and current lockdown restrictions are relaxed over time.

This includes empowering Local Councils and the business community to make small-scale temporary changes to enable safe, social distancing, without the need to seek consent from the Council.

Further details are available on this webpage and are updated in line with current Government guidance.

<https://www.suffolk.gov.uk/coronavirus-covid-19/guidance-for-safer-places-in-the-highway/>

Public Health

The Director for Public Health and Planning Officers have provided the following response to comments that have been received regarding the public health impacts of poultry farming.

Animal welfare and disease prevention is very highly regulated in the UK. For example, an environmental permit is required if poultry is reared intensively in an installation with more than 40,000 places for poultry under the Environmental Permitting Regulations 2016 and for flocks greater than 50, producers are legally required to register with Defra, whilst commercial keepers need to comply with their Biosecurity best practice advice dated 2020 <https://www.gov.uk/guidance/avian-influenza-bird-flu#biosecurity-advice>

The main similarity between Avian flu and Coronavirus is that they are Zoonotic e.g. they originate from animals. We believe the current strain of Coronavirus may have originated from bats and was related to potential poor food practices in a market.

Avian flu in the UK is transmitted from wild birds to captive stock, the nature of the farming process does mean it spreads quickly amongst the stock, however as outlined above this is why it is a regulated process and there are clear guidance and protocols in place from Public Health England, Defra and Animal Health agencies in order to monitor and manage any outbreaks.

There is nothing in law that would justify a planning application to be refused based on the known and managed approaches to such operations.

Public Health England/DEFRA have not issued any advice that would require us to deal with these businesses any different to the norm.

The Council is currently following all guidance coming out of Public Health England and there have not been any discussions about farming practice with regards to Coronavirus.

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