

## TRAFFIC REGULATION ORDER DECISION REPORT

<b>Report Title:</b>	B1117 including Cranley Green Rd/The Rookery, Eye - 7.5T weight restriction, ETRO
<b>Report Date:</b>	1 <sup>st</sup> May 2024
<b>Lead County Councillor</b>	Cllr Richard Smith MVO
<b>Local Councillor(s):</b>	Cllr Peter Gould
<b>Report Author:</b>	Andrew Bramwell, Senior Strategic Transport Planner

### Brief summary of report

1. To consider the advertised experimental traffic regulation order (ETRO) to prohibit a 7.5T weight restriction along the B1117 including Cranley Green Rd/The Rookery, Eye. See **Appendix A**. This includes the feedback from the public consultation including questionnaire responses and supplementary emails received.
2. The evidence included traffic data as part of the monitoring plan which captured vehicle classes, including HGVs at fifteen separate locations before and after implementation of the experimental weight restriction. Also, public feedback from an online questionnaire via the Suffolk County Council website and supplementary emails from residents and businesses to the [lorry.routes@suffolk.gov.uk](mailto:lorry.routes@suffolk.gov.uk) mailbox.
3. **Action recommended**

That the Cabinet member for Economic Development, Transport Strategy and Waste & the Head of Transport Strategy to abandon the current ETRO, due to harmful impacts and negative feedback from neighbouring communities.

## Reason for recommendation

4. Traffic flow data does support the view of neighbouring parishes, predominantly Debenham and Hoxne and to a lesser extent in Stradbroke, that significant increases of HGVs have occurred along alternative routes through neighbouring parishes. See **Appendix B**.
5. Due to the complexity of the issues and the statutory ERTO time constraints, there is not the option of making changes to current ETRO.

## Who will be affected by this decision?

6. All other highway users in Eye are anticipated to be negatively affected by the re-introduction of HGVs over 7.5T (not with exemptions) using the B1117 including Cranley Green Rd/The Rookery in Eye.
7. Surrounding communities which have seen increases of HGV volume travelling along alternative routes will see positive affects from anticipated reduced HGV volumes.
8. Hauliers and HGV Operators, who had previously used this section of highway prior to the weight restriction, will benefit from using this route having the opportunity to be more direct to their origins and destinations saving time and fuel.

## Consultation

9. The consultation period for the experimental weight restriction traffic order was from the 16<sup>th</sup> of May 2023 until the 31<sup>st</sup> of January 2024. As well as receiving 178 individual written responses objecting to the ETRO in Eye, a separate questionnaire which was shared with interested parties received 371 responses. This included the following responses to the suggested questions –

***What impact do you think this Experimental Traffic Regulation Order (ETRO) will have on the centre of Eye and its residents / businesses?***

Response	Positive	Not sure	Negative	None	-
Total	144	107	67	36	17

***What impact do you think this ETRO will have on neighbouring parishes and the road network?***

Response	Positive	Not sure	Negative	None	-
Total	33	45	270	6	17

10. Responses from businesses to the questionnaire, who the majority travelled to and through Eye daily, were shared between the impact on the centre Eye but, concluded that there would be a negative impact on neighbouring parishes and road network if the weight restriction became permanent.

## Councillor's Comments (Cllr Peter Gould)

11. Currently, not available for comment.

## Officer Comments

12. The experimental weight restriction in Eye was implemented due to reported building strikes between the junctions of Magdalen Street and Castle Street and Castle Street and Lowgate Street. This also included reports of HGVs using the pedestrian walkway to negotiate the junctions at the pre mentioned locations and in one case striking a member of the public along the walkway.
13. During the formal advertising period, approximately 178 individual written responses were received objecting to the ETRO in Eye which included, a joint petition ("Stop the Lorry Ban in Eye to Support Stradbroke and Debenham petition" – **Appendix B**) and joint objection submission (**Appendix C**) from neighbouring parishes which included Brome & Oakley, Debenham, Denham, Horham & Athelington (stated their support for the submission) Hoxne, Stradbroke and Thornham.
14. Many of the supplementary responses to the public consultation have specified many incidents of HGVs using the public walkway in other parishes which have seen increases in HGV volume. This has also included references to pinch points in their parishes where HGVs have found it difficult to pass each other.
15. Feedback from Trading Standard officials for the Lorry Watch scheme / 7.5T weight restriction along The Street in the village of Thorndon, just south of Eye and an alternative route to the A140, has seen 39 reports resulting in written advice within the last ten months since the ETRO was implemented in Eye. This compares to 24 reports resulting in written advice within the last seven months prior to the ETRO in Eye being implemented. Whilst the average total volume of HGVs between 2022 and 2023 has shown a 25% increase along this route, reported HGVs which has resulted in written advice has only increased slightly per month indicating a small impact from the restriction in Eye being implemented.

## Public Sector Equality Duty

16. Depending on the decision for the next steps of the scheme, any restriction must be considered in the context of the Equality Act 2010, having due regard to the need to –
  - a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
  - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
  - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

17. The option to abandon the ETRO will reverse the feelings of improved safety which has been commented through public feedback via residents who live along the restricted route. Whilst pedestrians, cyclists and wheelers still have the option to use this route as before, a safer alternative along Church Street could be seen as an option which has a current weight restriction to HGVs over 7.5T.
18. The option to revoke the ETRO will have an expected positive effect on alternative routes through neighbouring parishes. As evidence has been suggested through the public consultation and the analysis from traffic data from multiple locations, safety to road users including pedestrians, cyclists, and wheelers will improve to a similar level before the experimental weight restriction was implemented.

## **Human Rights Act**

19. The objections need to be considered in the context of the Human Rights Act 1998 which prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights. Some specific convention rights have relevance.
20.
  - a) Article 8 identifies that 'everyone has the right to respect for his private and family life, his home and his correspondence.' However, through the process of consultation, individuals affected by any proposed change can express their opinions and thereby ensure appropriate participation 'in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others'; and
  - b) Peaceful enjoyment of possessions (including property), subject to the State's right to enforce such laws as it deems necessary to control the use of property in the public's wider interest (First Protocol Article 1).
21. Other rights may also be affected including individuals' rights to respect for private and family life and home.
22. Regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole. Both public and private interests are to be taken into account in the exercise of the Council's powers and duties as a traffic authority. Any interference with a Convention Right must be necessary and proportionate.
23. In this case, officers consider that any interference with an individual's Convention Rights is justified in order to secure the significant benefits in improving access and road safety.

## **Appendices**

- A Weight restriction extent map (existing and proposed)
- B Traffic survey data – October 2022 vs October 2023.
- C Confirmation of Joint Petition – “Stop the Lorry ban in Eye to support Debenham and Stradbroke petition”.
- D Joint submission from Brome & Oakley, Debenham, Denham, Hoxne, Stradbroke and Thornham.

# FORMAL DECISION OF THE CABINET MEMBER FOR ECONOMIC DEVELOPMENT, TRANSPORT STRATEGY, WASTE AND THE HEAD OF TRANSPORT STRATEGY

Councillor Richard Smith MVO and Graeme Mateer reviewed the report and made the decision set out below:

**Decision made:**

- Abandon current ETRO, due to harmful impacts and negative feedback from neighbouring communities.

Signature of the Cabinet Member for Economic Development, Transport Strategy and Waste.



Date:

03/05/2024

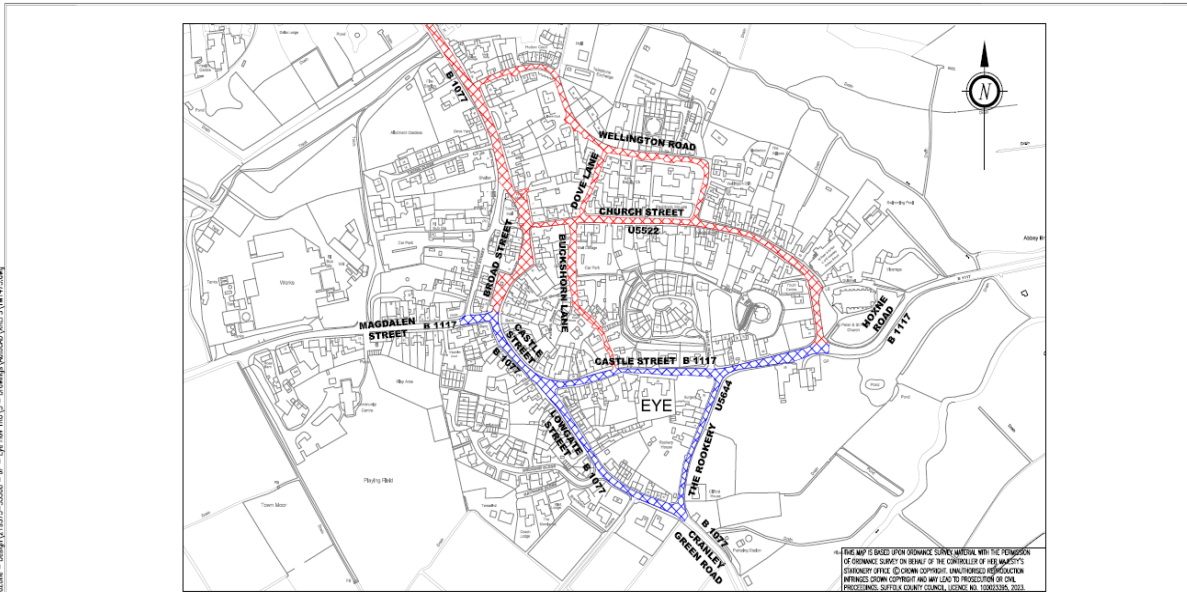
Signature of the Head of Transport Strategy





Date:

03/05/2024.....

# Appendix A



-  Existing 7.5t weight limit (except for access).
-  Proposed new 7.5t weight limit (except for loading).

The map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. SUFFOLK COUNTY COUNCIL, LEICESTER, MK. 10102309, 2019.

**Suffolk Highways**  
your roads, our business

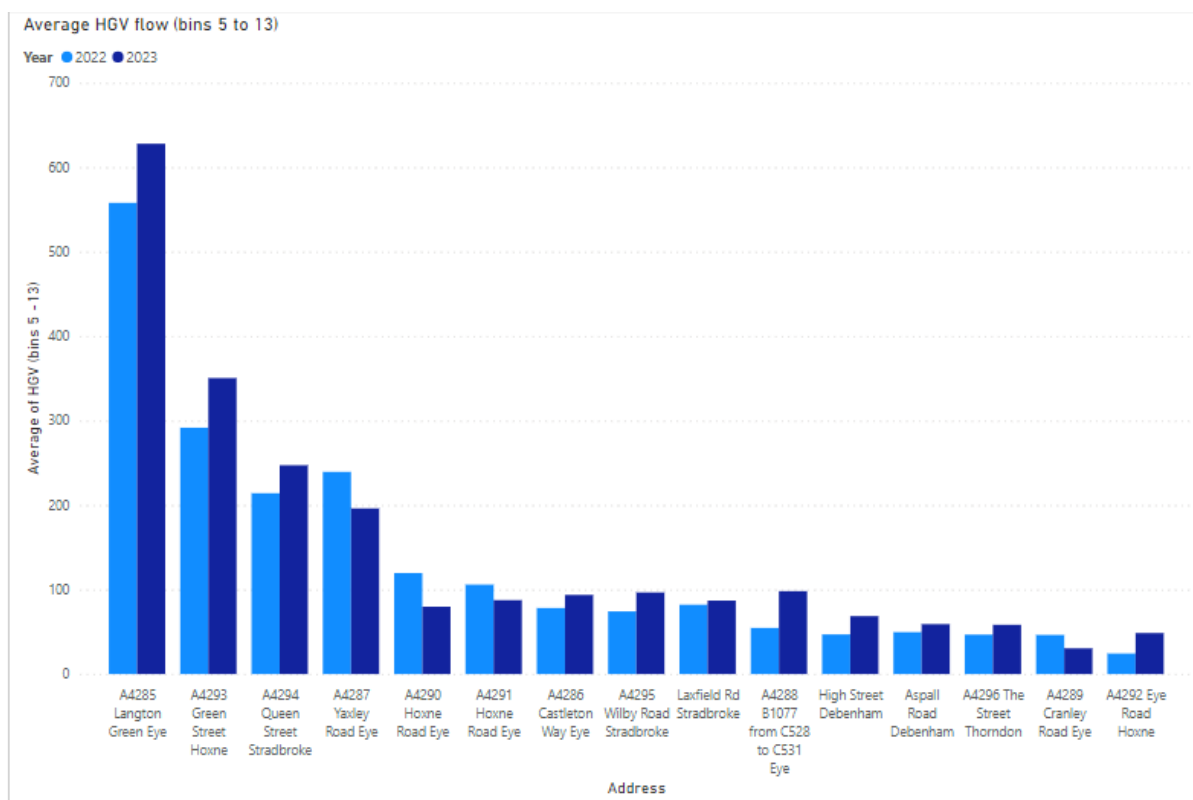
Phoenix House, 3 Gosford Road, Ipswich, Suffolk IP1 5NP.  
Highways enquiries: 0344 808 8111 www.suffolk.gov.uk/highways

**Suffolk County Council**

<p><b>STATUS : FOR LEGAL ORDER</b> <b>ISSUE : DETAILED DESIGN</b></p>
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<p><b>PROJECT TITLE</b> Eye Town HGV Extension of 7.5t weight limit</p>	<p><b>ORIGINATOR</b> DC</p>	<p><b>CHECKER</b> NTS</p>	<p><b>DESIGNER</b> JP</p>	<p><b>DATE</b> NOV 2022</p>
<p><b>DRAWING TITLE</b> 7.5t Weight Restriction Extents</p>	<p><b>DRAWING NUMBER</b> 219537-HGV-00001</p>	<p><b>REVISION</b></p>		

## Appendix B



**Y axis = Average total HGV Classes**

**X axis = Address (location of survey point)**

**2022 value =**

**2023 value =**

The above chart shows the comparison of average 5-day HGV totals over the duration of the surveys (each year) at every location which was monitored pre and post implementation of the experimental weight restriction. Locations which saw an increase after the experimental weight restriction was implemented included the High Street, Debenham (46% increase), the B1118 at Green Street, Hoxne (20% increase) and Queen Street, Stradbroke (15%). Locations closer to Eye, including Cranley Road, Hoxne Road (east of Eye) and Yaxley Road saw a 34%, 33% and 18% respectively. Notably, locations just north of Eye including ones on the boundary of the pre-existing permanent 7.5T weight restriction saw increases to average HGV volume between 2022 and 2023. These included Castleton Way (20%) and Langton Green (13%).



## Appendix C

Our Ref: 00069  
Date: 2 February 2024  
Enquiries to: Councillor Services  
Tel: 01473 265119  
Email: [councillor.services@suffolk.gov.uk](mailto:councillor.services@suffolk.gov.uk)



James Hargrave



Dear James

### **Petition**

At Suffolk County Council the Democratic Services Team is responsible for holding any petitions which are received. On Friday 2 February 2024 your petition Stop the Lorry Ban in Eye to Support Stradbroke and Debenham was passed to Democratic Services by Councillor Richard Smith.

We can confirm that the petition contains approximately 414 signatures. Please be aware that in accordance with the Suffolk County Council constitution signatures of persons who live, work or study in the County Council area will be valid. However, we have not included in the count, signatures where there is no address/postcode, live outside of Suffolk's neighbouring counties or the UK.

As a result, we can confirm that the petition contains approximately 294 signatures.

You will receive a response to the petition on behalf of the Council in due course.

We will inform your local county councillor, Councillor Peter Gould, that the petition has been received. We will also ensure that the Suffolk Highways are aware of the petition who will consider the issues raised and respond on behalf of the Cabinet Member in due course.

Yours sincerely

Sue Mitchell  
Democratic Services  
Corporate Services Directorate

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX  
[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

## Appendix D



14<sup>th</sup> December 2023

### Joint submission regarding the 7.5t limit ETRO in Eye

1. The Parishes note that the Introduction on page 4 of Suffolk County Council's Feasibility Study, dated July 2021, describes the town of Eye but could easily be describing many of the parishes contributing to this submission.
2. There is no publicly available evidence that local businesses and haulage companies were consulted prior to the ETRO being introduced.
3. The design considerations on page 5 of the Feasibility Study include the following statement: "*Consideration also needs to be given to the impact of any measures on the wider network and surrounding communities*". The following comment in an email from July 2023 would suggest that an impact assessment was undertaken, as the email clearly highlights that negative impacts for neighbouring areas were "*expected*".

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**From:** [redacted]  
**Sent:** 04 July 2023 08:58  
**To:** Suffolk Lorry Route review  
**Cc:** [redacted]  
**Subject:** RE: Eye ETRO restrictions - feedback so far  
**Attachments:** 2023-07-04 Eye ETRO consultation results as at 4th July.docx; 2023-07-04 Eye ETRO consultation results as at 4th July.xlsx

Hi [redacted]

Here are the latest results from the consultation, as before in two formats.

There are 46 completed responses so far and largely positive for Eye, although, as expected, less so for the impact on neighbouring areas. Good to see the majority of responses are from those travelling through Eye on a daily basis who will certainly be aware of the impact.

Regards

However, the outcome of any assessment is not included in the Feasibility Study neither is a copy readily available on Suffolk County Council's website. The Parishes would welcome sight of any impact assessments undertaken prior to the ETRO being introduced.

4. Page 31 of the Feasibility Study states: "*... a route may seem inappropriate for HGV use but there may be no other realistic alternatives. If there are no alternative routes, introducing a weight restriction will only displace problems on to similarly inappropriate roads*". The Parishes would draw attention to the aforementioned similarities between Eye and surrounding parishes and one particular difference of note; the roads in Eye already benefit from 20mph speed limits which are proving difficult and complicated for other parishes to obtain.

5. Page 17 of the Feasibility Study states that: "Although the number of personal injuries is low the fear of injury within the town is high and increases as the number of large vehicles in the town increases year on year." The Parishes would request that when reviewing the impact on the surrounding areas, Officers and Councillors bear in mind that the fear of injury has greatly increased in all areas, and especially those areas where existing, and now redirected, traffic is passing directly in front of primary schools.
6. It is not clear from correspondence with Suffolk Highways whether or not the ETRO is currently being fully enforced, and given that Suffolk Highway's pre- and post- survey data has not yet been provided to the Parishes to enable a full review to be made ahead of the preparation of this submission, it is difficult for the Parishes to fully evaluate the current impacts. The Parishes do note that there has been an increase in large vehicles within their areas, and note that this may increase significantly if the ETRO is made permanent and fully enforced.
7. In addition, the large survey of the road network undertaken by WSP modelling on behalf of Suffolk County Council highlighted that the two junctions on the A140 which are most impacted by the ETRO were already experiencing significant issues and if the 7.5t limit is permanently introduced it will only serve to increase these issues.
8. The potential impacts of the proposed ETRO could also have been evaluated as part of the Suffolk Lorry Route review undertaken in July 2022 ahead of the ETRO being introduced.
9. The Feasibility Study indicates on pages 34-35 that to monitor and enforce the weight limit, should it become permanent, a CCTV system may be required at considerable costs. There is no indication how this would be funded given the already stretched budget of Suffolk County Council.
10. The Parishes are, separate to this submission, seeking information on how the ETRO has been funded to date, particularly noting that some of the funding appears to be coming from "corporate funding" and Mid Suffolk District Council:

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**From:** [REDACTED]  
**Sent:** 28 June 2022 14:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Eye HGV restrictions

Hi [REDACTED]

I think that after the design stage would be a good point to review. We have the following funding allocations confirmed:

- [REDACTED] Highways Locality Fund - £5k
- Eye Town Council - £5k (note different to your funding!)
- MSDC - £15k
- SCC (Corporate funding) - £25-30k

So I'm fairly confident there will be enough, but shouldn't take that for granted!

Thanks,  
 [REDACTED]

[REDACTED]  
 Head of Transport Strategy  
 Growth, Highways and Infrastructure  
 Suffolk County Council

11. The Parishes note that the existing 7.5t limit through the centre of the town forces large vehicles to turn into/from Magdalen Road, if the vehicles were able to access Broad Street from either end, there would be fewer building strikes and the large vehicles would be able to access the new large roundabout on the A140 at Brome.
12. The Feasibility Study Introduction refers to a turn restricting forward visibility for drivers causing issues when confronted by other large vehicles travelling in the opposite direction, vehicles 'inevitably' mounting pavements causing building strikes and putting pedestrians at risk. The Parishes note that there are no parking restrictions here and, on most occasions, there are multiple vehicles parked on the West to East carriageway causing vehicles to travel on the wrong side of the road.
13. The Parishes note the comments made in the following submission which concisely highlights the environmental issues of this ETRO and the concern of Eye residents themselves :

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From: [REDACTED]  
Sent: Friday, May 26, 2023 5:03 PM  
To: [REDACTED]  
Subject: ETRO IN EYE TOWN CENTRE

**EXTERNAL EMAIL:** Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT

The idea of banning lorries etc driving through Eye is ludicrous, as we are supposed to be supporting businesses, not making their haulage costs increase, which will probably show in more price rises for their products, not really helping the cost of living crisis!  
The people moaning are residents who live on the suggested lorry route, they all knew when purchasing the properties that there's lorries driving past their houses, so why buy the property!  
More worrying is that the town Councillor, who is the main instigator for this ridiculous idea is a well known Green political group supporter, which i find very hypocritical because making the lorries take a several miles detour is not only time and cost consuming, but just think of the carbon footprint this extra travelling by big diesel lorries is creating, not very Green at all is it!, or is she putting herself before the environment, once again, not very Green!  
Another ridiculous suggestion in the experiment is that some businesses will be given a exemption to drive through Eye, so the lorry in front can't come through, but the one behind can, what sort of arguments will that cause.  
Leave things as they are, and those that don't like it, move, or stop parking your cars on the narrow roads so the traffic can get through effortlessly.

Kind regards  
[REDACTED]  
Eye resident

14. The summary on page 16 of the Feasibility Study ends with the following statement: *"The aim of the Town Council is that any future measures in Eye Town keep large vehicles on the A140 to reach their destinations rather than picking their way through the small towns and villages and prevent traffic travelling east to west through the town to access the A140. This report considers the options to remove and reduce HGV traffic flows through Eye."* However, the outcome of the ETRO has been to push the vehicles in to the surrounding areas, which were already experiencing significant issues of their own, not onto the A140.

15. In summary, the Parishes submit that permanently introducing the 7.5t limit will have a significant adverse impact on the wider network and surrounding areas. This is supported by the County Council's own Feasibility Study which indicates that a weight limit is not the solution. The Feasibility Study provides many alternatives which do not appear to have been explored, some of which would not have affected the neighbouring parishes. Suffolk County Council's responsibility is to provide solutions for all areas not just one, especially when that one solution is to the detriment of the other areas. The ETRO should be ended immediately and the other options laid out in the Feasibility Study further investigated to seek a solution suitable for all areas.

Submitted by:

Odile Wladon

Clerk to: Stradbroke Parish Council & Thorndon Parish Council

On behalf of:

Brome & Oakley Parish Council

Debenham Parish Council

Denham Parish Council

Hoxne Parish Council

Stradbroke Parish Council

Thorndon Parish Council



