

Bucklesham Parish Council

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Bucklesham Parish Council's supporting comments on Suffolk Highways' C375 Brightwell & Bucklesham 40mph Speed Limit Report

Purpose of Report

For many years, Bucklesham Parish Council (BPC) has requested a reduction of the speed limit on the C375 Brightwell Road, Bucklesham, from 60mph to 30mph as it passes from Bucklesham Primary School to the dwellings at Bucklesham Heath. The Council has now been contacted by Keith Sampson, Suffolk Highways Traffic Regulation Officer, asking for our comments on their 'Speed Limit Report' for a 40mph speed limit on the C375. This document will serve as Bucklesham Parish Council's comments.

Identifying the Need

Bucklesham Parish Council has repeatedly requested that the County Council reduce the speed limit to 30mph on the C375 Brightwell Road. We are therefore very disappointed to see that, following Highway's discussion with Suffolk County Councillor Patti Mulcahy, the proposal is for a reduction to 40mph only. The Highways report states that we have requested a 40mph reduction. However, we need to make it clear that we have always requested the speed limit to be 30mph, and will continue to do so. The Council strongly believes that 40mph is still way too high a speed for vehicles to be travelling as they pass Bucklesham Primary School. The Parish Council believes that Bucklesham is the only primary school in the county where there is a 60mph speed limit on a road that passes a school. Many other local schools are afforded a '20's Plenty' zone, ensuring their children are protected from the dangers of speeding traffic.

We are also extremely disappointed that the proposal only covers a 1.1km stretch of the C375 and stops well shy of the dwellings and businesses on Bucklesham Heath.

Unbelievably, the section of the C375 to be considered is the stretch commencing just south of its junction with Main Road (at the school) to a point where it joins the current 30mph speed limit at Brightwell. Therefore the majority of this section has no buildings or access points, while the stretch of C375 that continues south of the school (with significantly more junctions and dwellings) has been excluded from the proposal. We are incredulous as to why a section of the road also in need of speed reduction has been ignored.

Bucklesham Parish Councillors, as residents of the village, are all acutely aware of the dangers of a 60mph speed limit on the road that passes Bucklesham Primary School. While the report has only identified two reported incidents, over the years there have been many near misses and several minor incidents which have not been reported. These have involved children and parents from the school, walkers, joggers and cyclists. The Parish Council strongly believes that the reduction in speed should seriously be considered without there needing to be numerous serious incidents first. The Parish Council feel that it is possible to act *before* collisions occur and prevent them, rather than waiting for them to happen, apologise and then 'learn lessons' afterwards.

There is no footpath for residents of Bucklesham Heath walking along the C375 from the south to the Primary School, or to get to the centre of the village, or for pupils from Brightwell who attend the school walking along that road from the north. With no footpath and a 60mph speed limit, the conditions are extremely dangerous. Two village footpaths and one bridlepath exit directly onto the C375, all of which are used daily by residents. There are a huge number of cyclists that use the road to access the Twisted Oaks Cycle Park and Trails and who commute along this route from Felixstowe and Woodbridge to avoid the duel carriageway.

There is no off-road parking on the C375 for the school, with parents having to park on the edge of the road. There is a staff car park for 6 vehicles, for a workforce of 25. Additionally, the School has 91 pupils on role, only 14 of whom are Bucklesham children. Therefore, 77 children travel in by car each day and their parents have to park on the road outside the school. The school sits on a blind bend of the C375, and on approach to the T-junction with Main Road there is no visibility to see oncoming traffic. Therefore, cars overtake the parked vehicles on the side of the C375, and are often travelling at 60mph towards oncoming traffic coming around a blind bend. There have been several cars that have ended up in the field alongside the C375 as they were travelling too fast and had misjudged the bends in the road.

The volume of traffic on the C375 is likely to increase considerably with the extensive developments in Felixstowe, Walton and Trimley, coupled with the development at Brightwell Lakes. The Parish Council is aware of more and more vehicles using this road as the scenic route to and from Felixstowe and Martlesham, and it is often used as a 'rat run' to avoid congestion on the A14/A12 Seven Hills roundabout. Increased traffic means increased risk.

The expansion of caravan sites and camping sites in Bucklesham, whilst welcome, just serves to increase the volume of traffic (usually towing caravans). Visitors and residents of these sites are also pedestrians who walk along the C375 as it is the only route off of the site into the village. The recent approval of the planning application for the Bucklesham Solar Farm, with access onto the C375, will also increase construction traffic within yards of the Primary School, all currently permitted to travel at 60mph. Also located on this road immediately opposite the school, is a Bus Stop, which is within just a few meters of the junction. Further along the C375 at Bucklesham Heath is a much used Post Box, one of only two in the village.

Inconsistencies with the Speed Limit on the Whole of the C375

The speed limit on the C375 is reduced to 30mph after entering Brightwell village. There are only 6 houses on the roadside in Brightwell, with 7 further dwellings whose driveways exit onto this road. In comparison, in Bucklesham the speed limit is increased to 60mph despite the road passing a primary school, 8 houses directly on the roadside and 11 further dwellings with driveways that exit onto the road. There is no answer given as to why the same road has a 30mph speed limit through Brightwell village, but has a 60mph once in Bucklesham.

At the north end of the C375 is the A12, a dual carriageway with a speed limit there of 50mph. It seems incredulous that this new stretch of road (a straight, wide, well-lit road with a cycle path) as it passes the Brightwell Lakes development has been assigned 50mph, but the C375 (a narrow, bendy road, with no lighting and no footpath, passing a primary school through a quiet village) is deemed acceptable to remain at 60mph.

The Traffic Survey

The Traffic Survey advises that there are roughly 2,500 vehicle movements in a 24-hour period. If this were broken down into hourly movements we would see that a higher percentage of those movements occur during school hours and this is obviously the high risk time. If we add the data from our own Speed Indicator Device installed in the village we can see that there are on average 400 vehicular movements going through the junction at the Primary School, during school drop-off and pick-up times.

While the mean speeds both north bound and south bound average out at 37 mph, which suggests that there may be a high compliance with a reduced speed limit of 40mph, the 85th percentile speeds clearly indicate that a considerable number of vehicles are travelling much faster. Even 37mph is far too high a speed to be travelling past a primary school and passing through a residential area. It is still way too high a speed to be pulling out from a junction with such limited visibility is next to the primary school.

Collision Data

This section of the Report is very misleading. There may have only been two reported collisions in the last 5 years, however this cannot include near misses, damage-only RTCs, minor incidents, and all the sorts of incidents that people do not report because they feel there is no need.

Both reported collisions were at the Primary School which shows that it is a particularly dangerous junction, making it all the more vital that the speed limit is reduced from the current 60mph. A reduction to 40mph speed limit would be an improvement; a reduction to 30mph would be even better; even better than that would be a '20's Plenty' zone.

Photographs of the C375 Brightwell Road Approaching Bucklesham Primary School from the South



Shows the view for traffic approaching the T-junction from the south. Vehicles need to overtake parked cars on a junction with oncoming traffic (possibly travelling at 60mph) not visible.



Overtaking vehicle has had to cross the white lines into oncoming traffic, with the approaching vehicle travelling at a possible 60mph.

Also shows how the view of the traffic pulling onto the C375 is obscured.



Clearly shows the blind bend with approaching vehicles possibly travelling at 60mph.

You can see a vehicle coming around the bend towards the traffic that is overtaking a parked car close to the junction. You can also see the car pulling onto the Brightwell Road has their view obscured by that parked car.

The Police Report

The Parish Council feels that Police report sits on the fence and adds very little to the conversation since, as admitted by the author, they have very little knowledge of the C375 and are “*uncertain*” of many of the facts. Their report states:

“The entrance for the school is within the existing 30mph limit so am uncertain to what extent walking is conducted on the C375”.

There is **an** entrance on Main Road, but there is also **another** entrance on the C375 that is used by numerous children and parents entering the school grounds on a twice daily basis. This is also the entrance for children cycling to school and using the cycle sheds or walking from Bucklesham Heath.

The police report references the fact that there have only been two incidents, and therefore seems to imply that the road is not dangerous. Non-injury RTCs and near misses are not required to be reported to the Police and are often settled privately or through insurance, so there would be no Police data on this.

The Report also highlights the concern of too many changes in speed limit in a short stretch of road. The Parish Council would like to point out that if the proposal was for 30mph, to extend all the way from Brightwell to the southern edge of the village as you pass Tenth Road, there would be no change in speed because it would be 30mph for the entire section.

The report also states that if the need for this speed limit is an attempt to solve a problem associated with a single hazard, other measures should be considered. We would like to know what these other measures would be. We have been requesting proper enforcement of existing parking restrictions for years with no success. Measures already in place are being ignored. What other suggestions are there that would have a successful outcome?

With regards to this report as a whole, the Parish Council sincerely hopes that more credence is given to those with confirmed local knowledge, specifically the Parish Council, the School and local residents.

Comments from Rachael Rudge, Head Teacher of Bucklesham Primary:

*'The Police comments in this report state that the entrance to the school is in the 30mph section on Main Road. **This is incorrect** as the children also access through the car park on the C375. There is a lot of traffic at the beginning and end of the day and the school has had reported numerous incidents where children and adults have had their feet run over by cars. There have been many 'near misses' where children are trying to get in their cars parked on that road. Some prospective parents will not send their children to our school because of the dangers of that 60mph road. If any of our children left the school unaccompanied they would be straight onto a 60mph road. We have no warning signs that there are pedestrians or that there is a school there. We believe strongly that the speed limit should be reduced.'* RR

Comment from the Bucklesham School Association:

'Bucklesham Primary School is one of only a handful of schools in the whole of England that is adjacent to a road with a national speed limit and this is frankly dangerous and unacceptable. As parents we want this changed immediately, especially after the horrifying incident in Wimbledon when a car ploughed into school children having a tea party at school, causing numerous fatalities. We should not have to wait for the potential death or injury of a child before action is taken and we ask that the limit is reduced and enforced as soon as possible. We would like this to be 30mph - indeed many schools are now implementing 20mph around the school zone, so 40mph is still unacceptable.'

AW, JW, FM, LW, HS, HT, HA, EF, JH, RC, AM

Parents of Bucklesham Primary School children have started a petition to reduce the speed limit on this road to 30mph. The petition can be found [here](#). To date there are 334 signatures.

Comment from Twisted Oaks Cycle Park and Trails whose business exits onto the Brightwell Road:

'I would like to give my support to the proposed 40mph speed limit. I have lived locally all my life and used the Rd past the school most days . Over the years I have seen many accidents and near misses as the Rd curves round near the school and am amazed the speed limit has not been reduced before.' JP

BPC consulted residents of the village through the Bucklesham Bugle Newsletter and Bugle Bulletin Email Alert System, and received the following comments from residents of Bucklesham in support of this campaign:

'I am mum to a 7 year old girl at Bucklesham primary school and would like to raise my concerns of the 60mph limit past the school. I can not see how any school in any location can have cars going at 60mph pass it, it is absolutely crazy. As we have seen today and although we don't know the full circumstances - accidents happen. My concern is an accident of a car doing 60mph is far worse than 30mph. It will also decrease the risk of accidents of cars turning out of the junction. I know there are reasons behind the 60mph but none of those can be greater than the safety of our children.' FS

'I think a reduction in the speed limit on the Brightwell Road at the school is excellent there, especially because of the parking in the mornings - if you are trying to pull out at the junction it'll be comforting to know the oncoming traffic is not travelling at 60mph (because most of the time you cannot see what is coming...!)' KZ

'I am completely supporting the petition to reduce the speed limit on the Brightwell Road close to the Bucklesham primary school to 30mph to protect children and parents when taking and collecting children from the school.' SW

'We are pleased to hear that Suffolk Highways has finally agreed to consider the parish council request to reduce the speed limit on Brightwell Road where it passes Bucklesham Primary school. Whilst we are pleased to hear the proposal is being considered, and any reduction in speed as Brightwell Road passes our primary school would of course be welcomed, we are disappointed that the proposal is only to reduce to 40mph and not 30mph.'

'It is said that the surrounding area is "mostly countryside", which we accept but a little further up the road the speed limit reduces from 60mph to 30mph as the road meanders through Brightwell, where there are not many houses. Surely a school where 100 children are outside playing should warrant the same speed limit?'

Comments from District Councillors Lee Reeves and Mike Ninnmey:

'We would like to confirm our support for reduction of the speed limit around Bucklesham School. There must be very few schools in England without a reduced speed limit and I think 30mph is not an unreasonable limit'

Suffolk Speed Limit Policy

We understand that Suffolk Speed Limit Policy gives guidance on where speed limits less than the national levels should be considered. We feel the C375 Brightwell Road clearly meets the criteria. Please see below where BPC answers Suffolk Highways' comments:

1. Settlement has shop(s), school(s), public house, filling station etc.

Suffolk Highways comment:

The section being considered has Bucklesham Primary School within the section but no shop, public house, or filling station. Officers are unsure if this is sufficient to satisfy this criterion

BPC reply:

The section being considered contains Bucklesham Primary School. This is surely the **most** important consideration. Parish Councillors believe this is more than sufficient to satisfy this criterion.

2. Significant development on both sides of the road, but not necessarily continuous, with some development in depth, overall frontage exceeds 500m in length

Suffolk Highways comment:

Although there are residential and business properties along the route, along with a school all with significant frontages, officers are unsure if these would satisfy this criterion.

BPC reply:

There are a total of 19 residential properties along the full route that BPC have requested is reduced, as well as Bucklesham Primary School, and businesses including Twisted Oaks Cycle Park and Trails, Buggy's Autos, Suffolk Lavendar Farm, Bucklesham Park Holiday Homes and Westwood Caravan Park. Parish Councillors believe this is more than sufficient to satisfy this criterion.

3. Collision History

Suffolk Highways comment:

There have been two slight injury accidents along this section in the last 5-years of available data. Officers believe that this may satisfy this criterion

BPC reply:

There may have only been two collisions **reported** along this section in the last five years, but there have been numerous incidents and near misses that have gone unreported. Bucklesham Parish Council strongly believe that proactive measures should be taken to prevent accidents **before** they happen. Parish Councillors believe this is more than sufficient to satisfy this criterion.

4. Existing traffic speeds

Suffolk Highways comment:

The 85th percentile speeds north bound being 45mph, mean speeds 37mph and south bound 43mph, mean speeds 37mph, it suggests that drivers have already identified the appropriate speed for this section of road. If a 40mph speed limit is introduced, the current speeds suggest that there may be a reasonable compliance with the speed limit. With obviously limited development visible to drivers along the route, any reduced speed limit would need to be backed by low-cost speed reduction measures to give drivers additional clues to the appropriate speed.

BPC reply:

Isn't the point of a speed limit to take into account those who do not judge the road correctly? Also, it removes the burden of personal responsibility and forces compliance; speed limits are not for the average sensible driver. Parish Councillors believe this is more than sufficient to satisfy this criterion.

5. Many junctions, bends, and accesses

Suffolk Highways comment:

With four bends, 13 accesses and only one junction, Officers are unsure if this is sufficient for this criterion to be met.

BPC reply:

There are four bends, 13 accesses and **two** junctions (Main Rd and Tenth Rd) on our proposed section. This is more bends, accesses and junctions than in Brightwell. If this does not meet the criterion for Bucklesham, why does it in Brightwell? Even if there were no other junctions, BPC would argue that the mere fact that there is a junction with a primary school should warrant a reduction in the speed limit. Parish Councillors believe this is more than sufficient to satisfy this criterion.

6. Some pedestrian/cycle activity throughout the day with possible peaks associated with schools and community facilities.

Suffolk Highways comment:

There are no footways within this section so any pedestrians would be forced to walk on the carriageway. There are two public footpaths that exit onto C375 suggesting that there will be pedestrian movements. It is also likely that leisure cyclists will use this route. Officers believe this criterion can be met.

BPC reply:

It is not just *likely* that cyclists use this route, it is a *fact*. Twisted Oaks Cycle Park is on this road, with numerous cycles using this route daily. The road is also used daily by pedestrians; dog walkers, joggers, people with children in pushchairs etc. Parish Councillors believe this is more than sufficient to satisfy this criterion.

7. Some provision of pedestrian/cyclists or acknowledged need and possible warning signs.

Suffolk Highways comment:

Apart from the public footpaths, there are no provision for pedestrians within the route. There are no warning signs to advise drivers to expect pedestrians in the carriageway or to meet cyclists.

BPC reply:

We have requested warning signs previously. There are ‘School’ warning signs but the flashing lights no longer work (despite numerous reports), one sign is broken and two are twisted so not visible by oncoming traffic. This surely speaks in our favour. Highways have not put up enough signage, meaning drivers have not been advised well enough, all of which reduces the likelihood of vehicles slowing down, hence the risk. Parish Councillors believe this is more than sufficient to satisfy this criterion.

8. Lengths of road that more closely fit the conditions for a 50mph limit but where the standard of road / forward visibility is more appropriate to 40mph.

Suffolk Highways comment:

Officers do not believe that with the forward visibility and nature of the C375, that this criterion will be met.

BPC reply:

Without the possibility of a car park for parents dropping off children to school, regardless of where they should or should not be parking, the fact is they do park on the C375 alongside the school, obscuring the view from the south. It is not good enough to say road users should not be doing this. They are. And there is no enforcement. Therefore, we must surely recognise the harsh reality and not the wishful thinking that this road has forward visibility. The visibility of the road is severely hampered by vehicles parking when dropping off and collecting children from school.

The school itself sits on a bend in the road. Even without parents parking dangerously and inconsiderately there would still be the issue of the school being sited on a blind bend with a 60mph speed limit. Parish Councillors believe this is more than sufficient to satisfy this criterion.

In Conclusion

Bucklesham Parish Council request that Suffolk Highways reduce the speed limit on the C375 Brightwell Road to 30mph as it passes through our village, including Bucklesham Primary School and the houses and business on Bucklesham Heath.

Our objective with this campaign is to try and reduce the risk of a serious collision and, while we would hope that this never happens, as representatives of local residents we feel that it would be remiss of us not to do all in our power to minimise this risk. Bucklesham Parish Council has no desire to wait until the worst happens and then have to say 'we told you so'.

We invite all members of the Highways Committee to meet with us on site to discuss this matter, in order for those making the decision to fully appreciate the implications of any inaction.

Ruth Johnson

10th January 2024
