

Good afternoon

On behalf of Kingsley Parish Council please find below our objection to the appeal which serves as our statement of case for the public enquiry. As I indicated in my earlier email the Council propose myself as advocate and Cllr James Aberley as witness if granted Rule 6 status.

Yours truly
John Steele

Appeal by Laver Leisure for the Moneystone development Reserved matters application
SMD/2019/0646. Ref APP/B3438/W/24/3344014

Kingsley Parish Council (KPC) completely agree with the decision by the Planning Application Committee decision of 26.10.2023 to refuse this application.
The reasons given for refusal are only part of the many objections raised by KPC on behalf of its Whiston parishioners and other residents of the Churnet Valley since this development first saw light as a part of the Churnet Valley Masterplan (CVMP). All our letters of objection can be found on the Planning Application Details for the various Moneystone applications:
-SMD/2014/0682 Outline Application which was refused.
-SMD/2016/0378 Outline Application which was granted despite, in our opinion, a clearly understated traffic and environmental impact in an unsuitable and unsustainable location, and in the face of the Council declared Climate Change Emergency.
-SMD/2019/0646 Reserved Matters, again refused.

Dealing first with the reasons for refusal given in the Decision notice.

It is considered that the proposed lodges, which are little more than caravans with cladding, fail to deliver the required high standard of design. Owing to the proposed materials and lack of any green roofs, lack of creativity and detailing the lodges could not be said to be of an appropriate high quality nor do they add value to the local area.

They have not been designed to respect this sensitive site or its surroundings, noting that it is in part adjacent to the Whiston Eaves SSSI

For these reasons the proposal fails to comply with Policies SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework including but not limited to Chapters 12 which says that good design is a key aspect of sustainable development and Chapter 15 which says that planning decisions should contribute to and enhance the natural and local environment by amongst other matters recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity

The lodges.....what did the CVMP envisage

What does an attractive eco lodge look like, courtesy of Centre Parcs

What Laver propose

The applicant includes in the appeal a paid for expert statement claiming that the caravans are « quality lodges ». The images speak for themselves.

Moving on to the Policy reasons for refusal we ask you to view the webcast of the PAC meeting of the 26th October 2023 https://staffsmoorlands.public-i.tv/core/portal/webcast_interactive/817069?force_language_code=en_GB

The essence of the speeches of the six speakers against the application are:

Councillor Mike Worthington – County Councillor

Councillors

Let's deal first with the freedom you have to refuse this application despite the fact that it is the reserved matters for a previously granted outline proposal. There are many precedents in English Planning including High Court judgements where reserved matters have been refused. The Planning Officer is at great pains to convince you that everything to do with access has been dealt with at outline. This is not true, there are too many material changes between the outline and these reserved matters.

We must start by looking at the history of this proposal. It first saw public light of day with the publication of the Churnet Valley Masterplan and the Core Strategy back in 2014. The thinking and indeed Laver Leisure's involvement in this go back to 2010. The world has changed since then...it's encouraging to see the current Administration of SMDC talking about updating the Local Plan. In a fast moving world we should not be basing our actions on long outdated ideas.

When the first Moneystone application SMD/2014/0682 came to this Committee it was quite correctly refused for several reasons summarised by this quote from the decision notice:
Overall, the benefits of this leisure scheme when considered together would not be sufficient in this case to significantly and demonstrably outweigh the harm identified above contrary to Policies DC2, DC3, SS7 and T1 of the Adopted Core Strategy; the Adopted Churnet Valley Masterplan and the National Planning Policy Framework.
It is considered that the proposals are unsustainable and do not conform with the provisions of the NPPF.

Strangely when the application reappeared as SMD/2016/0378 the major issue of unacceptable traffic impact T1 was no longer considered as a reason for refusal and with only minor tweaks to other matters this was given outline approval by the PAC on the 26th October 2019. Meanwhile the residents of Whiston had commissioned an independent traffic report by Paul Mews Associates which pointed to heavier traffic flows and greater danger on the highway network than the applicant's assertions.

I ask you to consider these arguments again because the applicant has made significant changes in the functioning of the development as now presented compared to the outline:

- the 190 "lodges" are being placed at higher density in only two Quarry zones instead of 250 units well spaced out in three zones.**
- there is no development in Quarry 2.**
- the extra lodges in Quarry 3 are to be placed on ground of uncertain stability.**
- the "lodges" turn out to be caravans.**
- the number of units to be sold has increased from 20% up to probably 60% and possibly more which invalidates all the assumptions about the hub facilities, the traffic flows and the potential employment used to justify the outline.**

You will hear more detail on these arguments and reasons for refusal inherent in the application before you. Please vote resoundingly to refuse this monstrous intrusion into the beautiful Churnet Valley.

Mr David Walters – On behalf of the Churnet Valley Conservation Society

Mr Chairman and councillors.

I want to talk about change as today you have the unenviable task of changing the lower Churnet valley for ever.

So many things have changed since this scheme's inception 15 years ago that even now you can change your mind for the right reasons....and save the Churnet Valley from a drastic change... for the worse.

Some things however, have not changed at all ; the same outright public opposition; over 1, 200 objections have been lodged on file, based on cogent and rational arguments compared with a mere half dozen or so in favour.

The same problematic road network ... same sole reliance on cars to access the site.

But one very important thing that this council did change was its decision over the access to the site itself, for in 2016 having passed the outline plans on condition of no right turn restriction at the exit from the site.....

it then changed its mind and refused the full application for that very same plan.

This means that condition 23 of the outline permission cannot be discharged and in effect there is no permitted access to the site.

As all three applications depend upon that access, that changes everything you will hear today.

And what else has changed? well lots, this plan before you differs in so many ways from the original luxury, center parks type scheme that was promised.

Too many lodges squeezed into too small an area, less hub facilities, the visibility issues of the hub building and its impact nearby listed buildings; insufficient screening and protecting the ancient woodlands; too much tarmac for internal roads and parking; light pollution and noise, all of which amounts to an intensive urbanising of what was supposed to be a greenfield restoration ,with quote 'sensitively spaced lodges in an idyllic woodland setting.'

There is now no longer a need for all those lodges . the Churnet valley has plentiful of supply of sites especially at Alton Towers 2 miles away where hundreds of them have been installed over the past ten years

Councillors, you must also remember Moneystone was always intended to be a dry floor, sand quarry but now Quarry 3 is now flooded to a depth of 30 metres and quarry 2 leaks contamination into it; ground water rebound and quicksands testify to an overall instability within it..

Government guidance states that safety and stability are planning matters that have to concern you.

These plans show a 60 plus lodge settlement located at water level, in a steep sided, soft sandstone quarry pit full of deep cold water that can kill even the best swimmers within minutes.Is that a risk this authority is prepared to allow?

Finally above all else please don't forget the biggest change looming large, is climate change.

So yes, we will all have to change our plans if we want a better futureand for this valley and its AONB status let's start now by refusing this application as it stands....or if you know your Bible parable , sinks.

Thank you.

Councillor Linda Malyon – Ward Councillor (on behalf of Councillor Fallows)

Thank you Mr Chairman and fellow councillors.

My concerns are about safety issues arising from the design and layout of this site.

With more lodges squeezed into only two areas within the site, unlike the original plan granted by the outline permission, and more for sale rather than to let, this scheme will rapidly become a huge residential settlement with an almost permanent population larger than the combined population of nearby villages, but with no doctors or additional medical facilities on site, thus stretching local resources.

But it is the nature of the site itself that is most alarming me . it is a quarry a massive silica sand quarry with lots of steep sides and an uncharted reservoir over 20 metres deep.

Silica sand particles are the second most killer after asbestos world wide .

Great concerns should be raised about the dangers of that quarry lake and the family lodges with balconies standing just inches above the water.

We have all heard of numerous accidental drownings in the cold waters of quarries lakes. Nationally we are continually told of the dangers of such places where cold water shock can kill in minutes even the best swimmers, and urged to avoid them.

Yet here there will be instant access, literally on the doorstep.

Also too areas of the quarry are clearly marked with signs warning of quicksand. Scrambling to get out of the water with steep drops below the surface would be a nightmare.

This quarry has never been inspected or approved by the Health and Safety Executive, the national body that oversees quarry safety, since it closed 12 years ago.

It is riddled with contamination from industrial tips and tailings are still seeping into quarry 3 from quarry 2 which the owners have not cleaned up.

Is it the sort of place you'd want your children to roam and be naturally inquisitive?

Imagine the fire risk in such a deep quarry heavily surrounded by woodland in a valley which has already suffered two major forest fires, the most recent of which took a week to control. Even a small fire amid hundreds of wooden lodges squeezed together in such a confined area, could quickly spread out of control with tragic results.

This site is remote and accessible only via narrow lanes.

When, and not if, there is an emergency, how easy will it be for emergency services to respond given the topography?

This site's only access route is fraught with natural hazards such as the dangers of Whiston bank on the A52, with its unsafe junction with Whiston Eaves Lane, and the 1 in 5 single track road that winds up Carr Bank from Oakamoor.

Road traffic accidents regularly occur in this area because of Alton Towers. These accidents cause issues of congestion and access that inevitably delay emergency services' arrival.

The tragic example of the Smiler Ride crash at Alton Towers when attending emergency services took an extra half an hour to arrive because of the roads and traffic congestion, should be remembered.

And when the emergency services are called in ... Ipstones and Cheadle ambulance etc etc

Cllr Tony Loynes – On behalf of Oakamoor Parish Council

Members of the Planning Committee,

OPC would like to begin by challenging the concept of this being a “high quality leisure scheme” as per the Outline application.

- Media releases at that time made comparisons with Centre Parcs and the Bluestone Resort in Pembrokeshire.
- Both of these do have high quality lodges and extremely restricted vehicular access.
- What we have in this reserved matters application is caravans disguised as lodges, crammed together to achieve maximum density, with Quarry 1 now having over 50% more lodges than in the Outline application and parking at every lodge
- OPC would argue that, based on the lodge structures proposed, and their layout, a “high quality leisure scheme” is never going to happen.

Another area of concern is the development around Q3, which the Masterplan identified as an area for limited sensitive development.

- 68 lodges in this area, with the majority located at the water’s edge, is neither limited nor sensitive.
- It certainly does not correspond with the DAS vision of “pockets of lodges nestled into the landscape” and because all lodges now have parking spaces, there is a road running around the entire area.
- Additionally, In order to accommodate this road, a bridge is proposed which the Planning Officer describes as “an unfortunate addition to the layout” that “owing to its very size, span and purpose will be a substantial engineered structure”.
- As a result, we really cannot see how the design for Q3 can be considered limited or sensitive.

Finally, we’re sure you will agree that, as a prerequisite, a development of this enormity, requires a competent and trustworthy developer. In the 7 years since Outline approval, OPC feel the applicant has demonstrated neither! I’ll share a few examples of their approach:

- With the exception of a hastily prepared recent leaflet, dialogue with Parish Councils and local residents has been entirely absent.
- Site safety has been ignored with collapsed perimeter dry stone walls and fencing not repaired and danger warning signage allowed to disintegrate.
- Despite agreeing to provide annual reports on the restoration of the Quarry, the applicant has not provided one since 2016.
- No licence fees or safety checks have been paid for by the applicant as owners of the reservoir in quarry 3, instead, in a bid to avoid culpability, its engineering agents, destroyed the existing safety overflow system by an unauthorised excavation of the bund contrary to the wishes or permission of the Environment Agency’s reservoir enforcement team.
- In 2016 SCC had to issue a stopping order to prevent illicit dumping of waste in Q2 by the applicants’ agents.
- The applicant has permitted the illegal use of the quarry buildings as premises for an unauthorised scrap metal business despite continuous threats of enforcement by SCC.

I would ask you all please bear these examples and the points previously raised, in mind when considering this application.

Thank you

Cllr James Aberley – Ward Councillor

Colleagues, every one of you here will know that representing people in your ward means that you take up and get involved in the biggest issues that affect the area. Since I was elected in 2019, the issue of Moneystone Quarry has filled my inbox every single week with the volume of concern from residents through the adjacent Churnet villages of Whiston, Oakamoor, Kingsley, Cauldon Low and of course Moneystone itself.

The fact that this is one of the longest running, most complicated and expensive planning applications that this council has ever determined will already give you an idea about why the decision that you make today will affect generations of people who live in the Churnet Valley.

The case officer has of course told you that everything has been determined in the outline application and this is just going over the detail but it is not the case. Other speakers have been clear about where people who are far more expert than myself, have gone through these files with a fine tooth comb, and have long campaigned to stop this development blighting the churnet valley landscape , have identified discrepancies between the original application and the detail that is being put forwards to you today.

The fact that the planning officers recommendation cites no less than 25 conditions covering issues around safety, and construction, mitigation of environmental issues and many other things suggests that even determining the application is very much pass the buck to someone else to make sure everything works out fine.

Every Cllr who has had anything to do with SMDC for any amount of time will know very well that planning enforcement is a total joke and ineffectual at best, so I would ask you with all conscience would you trust that these planning conditions will be appropriately supervised, and monitored. Some of them are long term actions and the resourcing at SMDC is not capable of effective monitoring, or are we expecting to allow the developer to mark it's own homework and just tell the council things are all good.

This site has exception circumstances in geological, environmental, safety and sustainability concerns and I am very concerned that simply throwing a load of conditions at this hoping it'll be ok is passing blame and more about getting the application off the system than having real care for what is being passed here.

In my time as district councillor I am yet to meet a resident of my ward that when the development is explained to them, supports this. The impact on the residents of a potentially fully owned park home development on our doorstep that has the potential to be larger than either of the adjacent villages is huge. If this was a planning application for permanent homes of this quantity, layout and size at the same location it wouldn't even get near a committee as it would be thrown out as being

inappropriate development in green belt, yet this is exactly what the case officers are asking you today to approve.

Please respect the Churnet Valley, it's unique position in the Staffordshire Moorlands, it's residents, and the fact that this application is wholly inappropriate in size, scale, layout, safety and appropriateness for where it is.

Thank you

Cllr John Steele – On behalf of Kingsley Parish Council

Councillors

If this application had been any good it would not have taken 4 years to get from validation to determination. A Senior Planning Officer has laboured even longer than that with the applicant to assemble a possible planning balance recommending approval, but with a myriad of conditions, some of which are most unlikely to be respected and even less likely to be enforced.

Now I will add the voice of Kingsley Parish Council and its Whiston parishioners. This development will dwarf the Whiston Ward in its size and frequentation. It is out of scale and out of place in this rural location. The Planning Officer is at great pains to try to limit your deliberations to reserved matters only. She claims that the question of access has been decided. It has not been, because the applicant, as you have heard, has stepped outside the matters approved in the outline. This allows you to achieve a different planning balance and reject the application because:

- the increase of the lodges for sale demolishes the alleged employment numbers and creates new and different traffic flows. The applicant has not updated the traffic survey. In the case files you will find a more up to date expert report by Paul Mews Associates commissioned by Whiston residents. It states that the proposed junctions do not meet the regulatory safety requirements and that the traffic impact in the outline proposal was significantly understated.

This application does not actually set out the detail as required in reserved matters:

- this is allegedly a "high quality" leisure development but we find that the lodges are not the tasteful and varied solid structures implied in the outline, and previous publicity. They are, in fact, pretty much identical caravans, on wheels, variously bolted together. The caravans are more densely packed than previously shown with a negative impact on ecology.

- the hub facility appears quite inadequate part new and part squeezed into the old laboratory buildings.

- the use of substantial quantities of imported materials may yet be alleged necessary to stabilise large areas. Remember the unlawful dumping that immediately followed the approval of the outline application in 2016.

- unresolved safety issues are a material planning matter.

Finally consider that:

- this application depends upon the Churnet Valley Masterplan. A document which was approved in March 2014 but the plans within it for Moneystone Quarry were being evolved a decade ago. A lot has changed in 10 years. Not the least our appreciation of the threat of climate change and the need for action. Councillors, quite simply, this proposal is out of date and out of touch with the reality of today and the future. It is contrary to the Adopted Local Plan Spatial Objectives 2, 8, 9 and 11 together with its Policies SS1, SS11, DC1, DC3 and T1.

The applicant has expended time and money to get this far, but it is time to scale back this monster and consider more ecologically and nature friendly alternatives.

Say no; but let us ask Laver Leisure to rethink their plans and come back with something that will attract smaller numbers of true countryside admirers, or indeed come up with other less intensive uses for the quarry and then to implement the majority of the agreed restoration plan.

In these extracts there are particular references which need expansion:

The number of units for sale rather than holiday rental.

The likely 60% or even more of the units for sale invalidates the traffic surveys used to support the outline approval. These traffic flows and their impacts were in any case refuted by studies carried out on behalf of Whiston residents by Paul Mews and Associates.

The other concern is that neither the applicant nor SMDC have fully taken into account is Wardle Armstrong report in Quarry 3 safety and stability where it refers to the creation of roadways, lodge emplacements and bridge construction on the made up part of the quarry bund, and the lack of proper investigation of stability in Quarry 1.

4.2 Key Considerations not within the scope of the Peer Review

4.2.1 The site visit has identified a number of key considerations outside the scope of this report which are relevant to the proposed development, and which are recommended for further investigation and consideration. These are summarised below:

- *Regulations*

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From an initial review, the proposed development would not be subject to the requirements of the Quarry Regulations 1999, however while the construction and earthworks plan is being designed the relevant health and safety and environmental regulations for the site need to be adhered to. The applicability of the Mining Waste Directive and associated permitting to the proposed materials movement should also be considered.

- *Infrastructure*

o There is insufficient geotechnical data to design a bridge to cross between the southern and western lower benches.

o There is limited available information on the proposed foundation design for the lodges that extend over the lake water, where pile foundations are considered the interaction with the slope would need to be considered.

- *Access:*

o The constructability of the proposed access roads, including the delivery of construction materials to build the new roads.

o The design of proposed road structure including edge protection bunds, requires sufficient road width, passing places and turning circles.

- *Q1:*

o Prior to development on tailings and infilled lagoons, sufficient

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geotechnical investigation and risk assessments should be carried out.

o Settlement calculations should be carried out for the proposed structures and utilities and demonstrate minimal and tolerable settlement performance.

o Considerable earthworks are required for the proposed development of Q1. From the three documents reviewed there is insufficient evidence of settlement assessments and the associated conclusions in respect of ground movement.

KPC also take issue with elements of the appellant's documentation

*Appendix 11: Assessment Against Third Party Comments
Public Responses*

11.1 The table below summarises public reasons for objection to the Planning Application and the Appellant's response:

KPC. Recycled Materials Concerns over the nature and quantity of the recycled building materials which will be brought to site. Specifically, concerns are that the site may become a waste disposal operation that is detrimental to the environment.

Appellant. The lodges will be constructed off site and transported to site on a low loader. This method of construction has sustainability benefits when compared to on site construction.

This answer first of all makes an unquantified assertion on sustainability, but far more importantly ignores KPC's concerns about waste importation.

These concerns arise from the fact that the day after gaining approval for the outline approval SMD/2016/0378 on 15.09.2016 the appellant began an unlawful dumping operation in Quarries 1&2. This continued over a number of days with materials of diverse and unidentified nature coming from a number sources until stopped by Staffordshire County Council and the Environment Agency. Some materials were delivered in tipper wagons but others in closed roller bed wagons.

In this respect if the appeal were to be allowed then KPC would ask for a condition specifically forbidding importation of materials to the site. The applicant has indicated that sufficient materials should be found on site for landscaping and general groundworks.

In order for our views to be fully and properly taken into account KPC would wish to be granted Rule 6 status and participate in the enquiry.



PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS

PAUL HOUSIAUX ESQ / WHISTON ACTION GROUP

PROPOSED DEVELOPMENT AT MONEYSTONE QUARRY,
EAVES LANE, WHISTON, STAFFORDSHIRE, ST10 2DZ
(PLANNING REF: SMD/ 2019/0646)

HIGHWAYS ASSESSMENT REVIEW

December 2019

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I.0 INTRODUCTION

- I.1 This highways assessment review relates to the Reserved Matters planning application made to Staffordshire Moorlands District Council Planning Ref: SMD/2019/0646 by Laver Leisure (Oakamoor) Limited as detailed below;

Reserved matters application proposing details for the appearance, scale, layout and landscaping for phase 1 of the leisure development comprising 190 lodges; erection of a new central hub building (providing farm shop, gym, swimming pool, spa, restaurant, cafe, games room, visitor centre, hub management and plant areas); reuse and external alterations to the existing office building to provide housekeeping and maintenance accommodation (including meeting rooms, offices, storage, staff areas and workshop); children's play areas; multi use games area; quarry park; car parking; refuse and lighting arrangements; and managed footpaths, cycleways and bridleways set in attractive hard and soft landscaping.

- I.2 These reserved matters relate to outline planning permission SMD/2016/0378 granted on 26th October 2016. The description of development granted under SMD/2016/0378 was for;

Outline application with some matters reserved for the erection of a high quality leisure development comprising holiday lodges; a new central hub building (providing swimming pool, restaurant, bowling alley, spa, gym, informal screen/cinema room, children's soft play area, cafe, shop and sports hall); cafe; visitor centre with farm shop; administration building; maintenance building; archery centre; watersports centre; equipped play areas; multi-sports area; ropewalks; car parking; and managed footpaths, cycleways and bridleways set in attractive landscaping and ecological enhancements (re-submission of Planning Application SMD/2014/0682

- I.3 The key point here is that consented scheme SMD/2016/0378 was a re-submission of SMD/2014/0682, which was refused planning consent by Staffordshire Moorlands District Council (SMDC) on 2nd December 2015. The applicant subsequently appealed the refusal decision for SMD/2016/0378 but withdrew the appeal request following a High Court judicial review finding in the applicant's favour for SMD/2016/0378.

- I.4 It is noted that Para's 3.4 and 3.5 of the Supporting Planning Statement (dated October 2019) that has been submitted as part of the current reserved matters application (SMD/2019/0646) states that:

The outline planning permission includes a total of 48 conditions, 8 of which require discharging through the submission of the subsequent reserved matters application at the site. These conditions are as follows:

- i. Condition 1: Approval of Reserved Matters;*
- ii. Condition 4: Conformity with Consented Outline Plans;*
- iii. Condition 9: Ecological and Arboricultural Assessment in respect of Footpaths, Cycleways Bridleways and Outdoor Activities in "Areas of Retained Landscape";*
- iv. Condition 11: Details of Existing and Proposed Levels and Engineering Works;*

- v. Condition 14: Conformity with Design and Access Statement and Mitigation Measures;
- vi. Condition 27: Statement of General Principles for the Disposal of Foul and Surface Water;
- vii. Condition 41: Arboricultural Impact Assessment; and
- viii. Condition 44: Structural Landscape Strategy.

Condition 1 of the outline planning permission requires details of the access (other than principal means of access), appearance, landscaping, layout and scale to be submitted and approved in writing by the Local Planning Authority.

- 1.5 With regards to the reserved matters procedure, Article 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out that;

Reserved matters applications deal with some or all of the outstanding details of the outline application proposals including... Means of access and covers accessibility of all routes to and within the site as well as the way they link up to the roads and pathways outside of the site...

- 1.6 Clearly there are issues to address in relation to access, which have not been dealt with in the current reserved matters application. For example, Para 7.3 of the Supporting Planning Statement sets out that;

Access into the development site was approved as part of the outline planning permission. The permitted access arrangements are for access from the existing access from Eaves Lane. A "no right turn" junction has been designed to prevent visitors from exiting the development onto Carr Bank. This would then ensure that traffic leaving the development would be directed to and from the site via the A52 to the north. The detail of these approved access arrangements can be seen on the following plans, approved and assessed by the outline planning permission: Eaves Lane Access Plan (PB5196-0100 rev C); and Proposed Layout of A52/Whiston Eaves Lane Junction (PB1608/SK001 rev C).

- 1.7 It is questioned as to how the statement that a 'no right turn' junction was approved as part of the outline consent is valid, when application ref: SMD/2016/0388 for the formation of a no right turn vehicular access on to Eaves Lane at Moneystone Park, Whiston was refused planning permission on 01/11/16. The layout of the proposed 'no right turn' junction submitted as part of SMD/2016/0388 is the same as that submitted as part of SMD/2016/0378 (both applications contain the same Plan PB5196 - 0100), and as such how can the same layout be both consented and refused planning consent? It should be noted that the one reason for refusal for SMD/2016/0388 stated that the proposal in isolation would be likely to lead to unsafe manoeuvres on the public highways and worsen highway safety. It is contended that the same reason should have been grounds for refusal of SMD/2016/0378.

- 1.8 Returning to fact that the current reserved matters application in effect a resubmission of SMD/2014/0682, the applicant for the current reserved matters application has not submitted any new supporting highways reports (Transport

Assessment, Travel Plan, Construction Management Plan, Delivery & Servicing Plan). This should raise concerns as it is clear that the current reserved matters application SMD/2019/0646 and SMD/2014/0682 are materially different. For example, the current reserved matters application would provide 190 lodges, and has increased the proportion of these that would be for sale to individuals - and the impact that such use would bring in terms of trip generation. It is noted that an earlier version of the scheme from 2012 proposed 660 lodges and a 120 bedroom hotel, while these are not part of the consented scheme, it does give an indication of potential future aspirations of the applicant.

- 1.9 As previously mentioned planning consent for SMD/2014/0682 was refused. A copy of the planning decision refusing consent for SMD/2014/0682 is attached at Appendix A of which reason 2 related to traffic any highway issues. For ease of reference, reason for refusal 2 is reproduced below;

'The traffic generated from the proposed leisure development comprising up to 250 holiday lodges together with traffic generated from day visitors to the proposed leisure facilities would result in a significant increase in the amount of traffic accessing the surrounding rural road network and particularly Eaves Lane/ Carr Bank to the east of the site access which would provide a direct route from the development to Alton Towers and Farley Lane which links Oakamoor and Farley. It is considered that the increase in traffic would lead to unacceptable congestion on these narrow country roads. Carr Bank, for example is largely single track with limited passing places and a steep gradient as the road enters the village of Oakamoor. Although there is an offer to agree a signage scheme, an intention to run a shuttle bus to Alton Towers as part of a Travel Plan to be secured by way of planning obligation and improve the A52/Whiston Eaves junction, these measures would not prevent guests using the aforementioned rural routes. Furthermore, guests from Black Plantation will be heavily reliant upon the car to access all facilities within the Hub area via the wider rural highway network given that it is physically detached and remote from the main venue with no pedestrian connectivity provided due to the change in levels in this area. It is for these reasons that it is considered that traffic from the proposal will not be satisfactorily accommodated on the highway network and that the proposal fails to provide and /or encourage satisfactorily the use of sustainable travel modes contrary to Policy T1 of the Adopted Core Strategy Development Plan Document.'

- 1.10 Paul Mew Associates were first instructed by Paul Housiaux Esq / Whiston Action Group to carry out an assessment of the proposed development for the original planning application in 2014 under SMDC Ref: SMD/2014/0682. Specifically, we advised on the visibility assessment for Whiston Eaves Lane at the junction with the A52 Ashbourne Road. A copy of the technical note which we prepared is attached at Appendix B.
- 1.11 The issue of sightlines at the junction of Whiston Eaves Lane with the A52 Ashbourne Road is examined in further detail in Chapter 4 of this report.
- 1.12 The remainder of this Highways Assessment Review examines issues relating to the development; accessibility, traffic generation and impact, the junction of the A52 with Whiston Eaves Lane and traffic management. These are considered to

be equally valid for the current reserved matters application SMD/2019/0646 as they were for SMD/2014/0682.

- I.13 Paul Mew Associates reserves the right to add additional comments if and when responses to outstanding Freedom of Information Application requests are received.

2.0 ACCESSIBILITY

2.1 The issue of accessibility is a key consideration of any planning development proposal.

2.2 The Churnet Valley Masterplan (Staffordshire Moorlands District Council – March 2014) sets out in relation to Sustainable Tourism that;

'The National Planning Policy Framework (NPPF) identifies that "There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
- a social role - supporting strong, vibrant and healthy communities; by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving a low carbon economy.'*

2.3 Each of the three roles identified have transport accessibility elements; land in the right places, accessible local services and addressing climate change / the low carbon economy.

2.4 Section 8.4 of the Churnet Valley Masterplan goes on to set out that:

'All proposals should aim to support more sustainable means of transport within and into the Churnet Valley and seek to change visitor perceptions of how they can travel around the Churnet Valley by increasing transport choices for those wishing to visit attractions and facilities and, where appropriate, providing facilities to enable visitors to park up and travel from key points by more sustainable travel means, and through measures to manage access and movement and encourage off-site exploration by non-motorised means.'

2.5 The key policy however, as cited in the reasons for refusal for the original application is Policy T1 - Development and Sustainable Transport of Staffordshire Moorlands District Council's Core Strategy (March 2014) which sets out that:

'The Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and helps deliver the priorities of the Staffordshire Local Transport Plans, where this is consistent with other policies. This will be achieved by:

1. *Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development.*
2. *Ensuring that major development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal.*
3. *Referring to appropriate parking standards as laid out in national guidance, or any parking standards that may be produced locally.*
4. *Where appropriate all new development shall facilitate walking and cycling within neighbourhoods and town centres, and link with or extend identified walking or cycling routes.*

Development which generates significant demand for travel or is likely to have significant transport implications (as identified within a Transport Assessment) will, where appropriate:

- *Contribute to improved public transport provision Provide proactive facilities and measures to support sustainable transport modes including on-site features to encourage sustainable travel methods e.g. cycle path links, cycle storage facilities, bus stops etc*
 - *Provide and actively promote travel plans'*
- 2.6 On a practical level, this relates to how well served a site is by transport modes other than the private car. With regard the proposed development at Moneystone Quarry, the Transport Assessment prepared in October 2014 by Royal Haskoning DHV that accompanied the original SMD/2014/0682 application (and which is equally valid for the current reserved matters application), sets out at Chapter 3 how the site is connected by sustainable modes of transport.
- 2.7 Sections 3.3 and 3.4 of the original application Transport Assessment set out the existing pedestrian and cycle infrastructure in the area of the site. While there are a number of local public rights of way, these tend to cross fields / follow field boundaries which are more suited for a leisure walks than for traveling to / from the site for guests or staff.
- 2.8 Similarly cycle links are more suited to leisure rides rather than traveling to / from the site for guests or staff. The Chumet Valley Cycleway in the area runs from Cheddleton to Froghall and then from Oakamoor to Denstone – missing out the section from Froghall to Oakamoor that would pass to the south of the site. The nearest National Cycle Route 550 comes to the proposed development site is Shaw Wall Lane / Tebblers Bank which is approximately 3.6km from the site via the A52 and Whiston Eaves Lane.
- 2.9 Appendix B of the original application Transport Assessment shows a series of potential cycle routes identified by the applicant and their consultants. These are largely leisure routes, rather than commuter routes, and follow existing footpaths which have no designation for use by cyclists or other existing tracks. Land ownership issues are also identified as areas where further work would be required. As such there is no guarantee that the potential cycle routes shown would be provided.

- 2.10 Direct access to the site on foot or by bicycle would be via Whiston Eaves Lane which beyond Whiston village does not feature footways or street lighting. Eaves Lane to the east of the site towards Oakamoor is narrow and steep in places and also does not feature footways or street lighting. Neither approach route is particularly suited to pedestrian or inexperienced / child cyclist access.
- 2.11 Section 3.6.5 of the original application Transport Assessment sets out that the proposed development site is '*exceptionally well located in context with... footpaths, cycle routes and equestrian routes.*' On the basis of the observations detailed above, this may be an over exaggeration of the site's pedestrian and cycle connectivity.
- 2.12 Section 3.6 of the original application Transport Assessment from October 2014 detailed public transport accessibility that were available at that time and set out that there were 4 regular public transport services from bus stops in either Oakamoor or Whiston. These included:
- 10 services per day on Route 32A from Oakamoor (1.5km from the site),
 - 2 services per day on Route X39 from Cotton (2.0km from the site),
 - 17 services per day on Route 32 from Kingsley Holt (4.2km from the site), and
 - 7 services per day on Route 235 from Cheadle (2.0km from the site).
- 2.13 It must be noted that the nearest of the access locations detailed in 2014 is 1.5km from the site meaning that anyone using these services would have to complete their journey on foot. As noted above, the approach route to the site via the local road network is not particularly suited to pedestrian access due to the lack of footways and street lighting.
- 2.14 A review of current bus services (December 2019) shows that the bus routes detailed above no longer operate or no longer serve Whiston or Oakamoor. The nearest current bus route serves stops at Kinglsey, some 3 miles from the Moneystone Quarry site. Hence, any guests would have to walk (with suitcases, etc) from Kingsley on the A52 which has no footways, is hilly and has steep gradients with blind bends.
- 2.15 As such, the site is inaccessible by bus without passengers having to complete their journey on foot. In periods of poor weather and during hours of darkness, the walk to the site from bus stops some 3 miles away is considered to be completely impractical and unsafe. It is therefore not surprising that the word 'bus' does not appear anywhere in the current reserved matters application Supporting Planning Statement.
- 2.16 Para 3.6.2 of the original application Transport Assessment set out that:
- 'They key to successful integration of the site into the public transport network will be to connect services to the site hub, which acts as the main point of arrival and departure for the site'*
- 2.17 Para 9.4.1 of the original application Transport Assessment went on to set out that:

'The proposals would require physical bus stop infrastructure to enable the site to be connected to services linking the site with other local destinations, such as Alton Towers, or potentially public bus services. The detailed design of such infrastructure would be dependent upon the level of utilisation of the existing bus service and hence, available capacity'

2.18 No further mention was made in the original application Transport Assessment or the Transport Plan Framework (Travel Plan) prepared in August 2014 by Royal Haskoning DHV of the measures taken to secure public transport service provision at the site, and no further information is provided as part of the current reserved matters application. As such, it cannot be assumed that local public transport operators would serve the site and as such the suggestion that the site would be linked to other destinations by public transport services is an aspiration rather than guaranteed by a formal agreement.

2.19 The original application Transport Assessment at Para 3.6.3 set out that;

'Alton Towers has confirmed that they would operate a bus service between the site and the leisure park for lodge residents wishing to visit Alton Towers for the day.'

2.20 Again, while this may have been an aspiration of the proposed operator, there is no evidence of a formal agreement between the operator and Alton Towers to provide such a service. Indeed, presented below is an extract from the Proof of Evidence of Cllr M. Worthington (SCC and SMDC Councillor) who is Chairman of the Alton Towers Transport Liaison Group. The group consists of both county and district councillors and officials as well as representatives of bus companies and Alton Towers. In his proof of evidence, Cllr Worthington sets out that:

'Although Alton Towers was approached by the promoters of Moneystone Park about the possibility of providing a shuttle bus service between the two sites, I can confirm that Alton Towers replied to the request that they were unwilling to provide such a shuttle bus service. This remains the case to this today.'

2.21 The original application Transport Assessment at Para 3.6.6 set out that;

'The site also has a highly significant opportunity to connect the site to the prospective Churnet Valley Railway. The consequential support that linkage of the site to that rail service would provide, as a feature of the local tourist industry in its own right, would be a further material benefit of the proposals.'

2.22 Again, this is an aspiration of the operator and no formal agreement has been entered into for such an extension of services to Oakamoor. It is also questionable where funding for such an extension would be sourced. The Churnet Valley Railway has recently been extended to Leekbrook, but there are no current plans to extend services to Oakamoor.

2.23 With regards internal roads, footpaths and cycleways, Article 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out that;

Reserved matters applications deal with some or all of the outstanding details of the outline application proposals including... Means of access and covers accessibility of all routes to and within the site as well as the way they link up to the roads and pathways outside of the site...

2.24 Apart from the proposed vehicle access on Eaves Lane and the current public right of way that passes through the site, none of the other proposed on-site roads, footpaths or cycleways connect to routes outside of the site. It has been stated that access arrangements have been resolved, but it is clear from the above that this issues should be revisited.

2.25 As set out in the Supporting Planning Statement for the current reserved matters application, a new Local Plan is current being consulted on by SMDC. Although not yet adopted, it is considered relevant that policies in the new plan should be assessed.

2.26 Policy Policy T1. Development and Sustainable Transport sets out that:

The Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and accommodates residual development traffic in line with the Integrated Transport Strategy. This will be achieved by:

- 1. Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development.*
- 2. Ensuring that major development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal...*

2.27 It is suggested that the current reserved matters application and the previous applications on which it is based, do not meet these crucial requirements in terms of sustainable transport

2.28 The Evidence Base used in preparing the draft new Local Plan includes the Churnet Valley Accessibility and Connectivity Study (January 2011) which at Table 3.2 in relation to constraints of the Moneystone Quarry site sets out that;

- *Road links to the site are very constrained*
- *Current site access is problematic*
- *Topography of the area is challenging for development*

2.29 Table 4.3 of the Churnet Valley Accessibility and Connectivity Study sets out that;

Bus access to Moneystone Quarry would be particularly problematic due to the constrained highway links (i.e. Eaves Lane)

2.30 In summary, the proposed development site is not easily accessible by modes of transport other than the private car. Local public rights of way do not provide direct access to the site or follow likely desire lines for journeys to work by staff, or access / egress routes for guests. There are no local bus routes that serve the site or anywhere within a reasonable walk distance, rather calling at bus stops at

around 3 miles from the site with onward connection to the site being required on foot. Aspirations for a dedicated bus serves between the site and Alton Towers and the reopening of a disused railway line are not supported by any formal agreements.

- 2.31 While the Supporting Planning Statement for the current reserved matters application references 'select' requirements from the National Planning Policy Framework (February 2019, Ministry of Housing, Communities and Local Government), it makes no mention of Paragraph 110 which sets out that;

...applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- 2.32 The current reserved matters application makes no mention of sustainable travel to the site, relying instead on the outdated information submitted as part of the original application made under SMD/2014/0682 and does not meet the requirements of the National Planning Policy Framework.

3.0 TRAFFIC GENERATION & IMPACT

- 3.1 The issues of traffic generation and impact have been raised in a number of documents relating to both the original and current reserved matters applications. Furthermore, based on comments from various parties, it is apparent that information on traffic generation has not been dealt with by the applicant to a sufficient level of detail, or indeed been made available to the public by the local planning and highways authorities.
- 3.2 Trip generations would relate to a range of users; day visitors who come to the development to make use of the leisure facilities provided but who do not stay on-site overnight, guests staying in the proposed lodges arriving and leaving at the start / end of their stay as well as trips made out to local attractions / destinations made during their stay, staff trips to and from work and servicing trips to deliver goods / linen and collect refuse / linen. While the current reserved matters application details provision of 190 lodges as part of Phase 1, Phase 2 would provide a total of 253 lodges - which is contrary to the 'maximum of 250 lodges' permitted under Condition 8 of consent SMD/2016/0378. The figure of 253 is taken from NBDA Architects' Drawing Ref 733/MS-021 of 14/10.19 which shows a total of 190 lodges for Phases 1a to 1d and 63 lodges for Phase 2.
- 3.3 As previously mentioned, an earlier version of the scheme from 2012 proposed 660 lodges and a 120 bedroom hotel. Following a recent Freedom of Information Application by members of the Whiston Action Group, there are additional traffic concerns about what proposals the developers intends to bring forward in later Phases of the Reserved Matters. There seems to have been no / inadequate consideration of the likely cumulative effects of future phasing.
- 3.4 This chapter sets out a review of the traffic generation assessment carried out by the applicant as part of SMD/2014/0682, comments from various parties and an alternative assessment carried out by Paul Mew Associates based on comparable publicly available data.

Applicant Traffic Generation Assessment

- 3.5 Section 5.6 of the Transport Assessment that accompanied the original application set out that vehicle trip generations for day-visitors and lodge guests had been provided by Christie & Co 'based on assumptions supported by evidence of comparable parks elsewhere'. Vehicle trips relating to staff and servicing of the site had been assessed on a first principles basis.
- 3.6 The assessment prepared by Christie & Co is included as an appendix of the Transport Assessment and is reproduced at Appendix C of this document. It should be noted that Christie & Co provide 'business intelligence' services relating to the buying and selling of businesses across a range of sectors including hotels, pubs, restaurants, childcare, healthcare, convenience retail, leisure and medical. They are not a specialist traffic consultancy who would normally be charged with the preparation of trip generation assessments for development proposals.

- 3.7 With regards to lodge guests, the assessment prepared by Christie & Co was examined and appeared to suggest occupancy levels for the proposed 250 lodges for various combinations of 3-night weekend stays, 4-night midweek stays and 7-day weekly stays. By year 5, they suggested occupancy levels of 67% equating to 61,137 occupied lodge nights per year and 245,348 lodge guests per year.
- 3.8 Under a Freedom of Information Application members of the Whiston Action Group (WAG) have been supplied with documentation that shows that the intended formula used to calculate the number of guests visiting each night (bed nights) will be 3.5 persons x number of lodges + hotel beds x 97% occupancy. This was then grossed up to produce an annual figure (application is for 365 days p.a.) Members of WAG has estimated this will amount to over 484,000 visitors per year. This figure does not take in to account the up to 100,000 day visitors per year plus staff (Christies figures) that will visit the site, and the annual number equates over 485,000 people per year. In contrast the population of local communities (Moneystone, Whiston, Oakamoor, Cheadle and Leek) has a population of around 107,000 - some 5 times smaller in terms of numbers of people than the proposed development.
- 3.9 Under another Freedom of Information Application, it has been found that it is the intention that 40% of 60% of the lodges are intended to become privately owned. WAG feel inevitably these will turn into permanent homes with daily commutes and probably by two car families, further increasing vehicle trips to / from the site.
- 3.10 Paul Mew Associates carry out a considerable amount of work for UK budget hotel operators who generally aim to achieve overnight occupancy of around 85% in their hotels. The occupancy levels for the proposed lodges at Moneystone Quarry of 67% at year 5 suggested by Christie & Co appear to be significantly lower than might be expected. This could have the effect of underestimating the number of visits and hence vehicle trips made to / from the development.
- 3.11 The Christie & Co assessment went on to suggest lodge occupancy levels for each week of an illustrative year, peaking during the school summer and Christmas holiday periods at 96% occupancy and that each lodge relates to 1.16 cars. At these periods on changeover days with 96% occupancy Christie & Co suggested that $(0.96 \text{ occupancy} \times 250 \text{ lodges} \times 1.16 \text{ cars} =)$ 278 cars would leave the site and 278 cars would arrive at the site, totalling 556 cars. They expressed this over Saturday and Sunday, such that on an average weekend day during peak periods there could be 278 cars arriving or leaving. This assumed an equal split of trips over the two weekend days, but if all changeovers were to take place on a Saturday the total number of car trips would be 556.
- 3.12 While these car trips relate to guests arriving at the start of the stay and leaving at the end of their stay, it does not make any consideration of other car trips made by guests on these days such as visits to local attractions / destinations. For example, once checked-in, guests may visit a local supermarket to buy food / drink to take back to their lodge, or may go out of the site to a local public house / restaurant for a meal. If each lodge made such a visit it could lead to a total of $(556 \times 2 =)$ 1,112 car trips per day.

- 3.13 The assessment by Christie & Co also suggested the number of cars per day for off-peak periods of the year for stays shorter than one-week. It is unclear how they reach their conclusions on these assessments. For example, from stays arriving on Sunday and departing on Thursday, the assessment suggested the number of cars would range from 31.91 cars for the week commencing 31st December to 53.66 for the week commencing 11th February. At the foot of the table on Page 2 of the assessment, they stated that the average for the year would be just 28.58 cars per day – a figure which is lower than the lowest level of car trips for any of the week periods detailed. The reason the average figure does not equate to what might be expected is that **no car trips are included on weekdays during the peak summer / Christmas holiday period. To re-iterate, the Christie & Co assessment appears to suggest that on weekdays during peak periods the lodges will not generate any car trips, which is clearly incorrect for the reasons given above.**
- 3.14 Turning to the Christie & Co assessment of day visitors, during weekends at peak summer / Christmas holiday periods, they suggested there could be 200 cars visiting the site per day. Each of these would make an 'inbound' and an 'outbound' trip resulting in total two-way trips of 400 car trips per day.
- 3.15 The figures used in the day visitor assessment were stated to come from assumptions supported by evidence of comparable parks elsewhere, but no further details are provided of which comparable parks have been used.
- 3.16 With regards staff trips, the original application Transport Assessment suggested the development would provide around 375 jobs of which 125 would be full-time and 250 part-time and that staff would be encouraged to travel by sustainable modes. It was also noted that a proportion of staff were expected to live on-site, although no details of numbers were provided to date. **The development proposed under SMD/2016/0378 would provide just 36 staff car parking spaces. In contrast the Supporting Planning Statement for the current reserved matters application sets out at Para 7.18 that 67 staff parking spaces will be proposed. There is no explanation as to the increase in staff parking requirements / provision.**
- 3.17 For sake of example, at any given time on a given day all 125 full-time staff and 125 part-time staff may be working. To assess how these staff may travel to work, 'Method of Travel to Work' data from the 2011 Census for the local output area E00151821 (which covers Whiston and the Moneystone Quarry site) has been examined. Census data is shown in Appendix D of this document.
- 3.18 Table I shows the number of people and mode splits for Journeys to Work for those who travel to work in the local output area from the 2011 Census. In addition, it shows how the Census mode splits would relate to staff at the proposed development on the assumed any given day detailed above. The mode splits suggest that car use is high as there are few public transport / sustainable travel alternatives.

Table 1. Method of Journey to Work

Method of Travel to Work	Census Return (No. People)	Census Mode Split	Proposed Development (No. People)
Underground, metro, light rail, tram	0	0%	0
Train	0	0%	0
Bus, minibus or coach	0	0%	0
Taxi	0	0%	0
Motorcycle, scooter or moped	0	0%	0
Driving a car or van	132	90%	226
Passenger in a car or van	10	7%	17
Bicycle	2	1%	3
On foot	2	1%	3
Other method of travel to work	0	0%	0
Total	146	100%	250

Source: Nomis Table QS703EW Output Area E00151821

- 3.19 The Census data suggests that of 250 people travelling to work at the proposed development, 226 of them would drive to work. This would suggest that there are few if any alternatives to driving – an assumption based on the fact that the nearest bus stop is 3 miles away and the nearest National Rail station is at Blythe Bridge 8 miles to the south west of the site which is not considered to be sufficiently close to the application site to offer a realistic ‘sustainable’ alternative to car based trip making.
- 3.20 The Travel Plan submitted as part of the original planning application aims to reduce reliance on the private car for staff. Para 7.2.1 of the Travel Plan sets out that;
- ‘25% of employees would drive to work, with 25% travelling as car share passengers*
- 3.21 On the basis of this statement and with an assumed staff on any given day of 250, 63 staff (25% of 250) would drive to work.
- 3.22 The provision of 36 staff car parking spaces as part of SMD/2016/0378 or 67 for the current reserved matters application would appear to represent a significant level of under provision as the Census data suggests 226 staff would drive to work. If these numbers of staff did drive to work, the proposed level of provision would not be able to accommodate demand. As such staff could end up parking their cars in guest parking areas (which would impact on guest parking availability) or on internal site roads or on-street on Eaves Lane or in Whiston village – all of which could have road safety implications.
- 3.23 In summary the trip generation assessments prepared for lodge occupants, day visitors and staff detailed in the original application Transport Assessment are considered to be not fully explained and significantly lower than might be expected. This sentiment was also expressed by the Inspector at the pre-inquiry meeting held on 27th July 2017 for SMD/2014/0682 at which he set out that he considered the traffic levels as expressed by Royal Haskoning both for visitors and staff to be of concern and inadequate. These points are reported in Para 5.4 of the meeting minutes, a copy of which is presented in Appendix E of this

document. For ease of reference Para 5.4 of the meeting minutes is presented below:

"I am afraid that I have some doubts about the traffic generation estimates (the trip rates) used in the Transport Assessment. First, I do not understand how they relate to the feasibility study; this may be explained in some document that I have not yet managed to see. Second, I fail to see how the parking arrangements for staff are going to work. Third, the resulting generation rates seem low in comparison with anything that I currently know about. It would be helpful if a reference could be made and evidence pulled together that might justify these estimates. It would be particularly helpful if comparative evidence can be found to allay my doubts. Such matters should be addressed in the appellant's highways and traffic proof of evidence. Very helpfully it was suggested that a note might be prepared in advance of exchanging the proofs of evidence; that would be most welcome"

- 3.24 To date, no such note has been submitted by the applicant.
- 3.25 In lieu of this and to further address this point, Paul Mew Associated carried out research in to the levels of trip generation the proposed development might generate.
- 3.26 While the applicant has maintained that the proposed development will not be a 'Centre Parcs' style development, from a land use point of view and indeed a trip generation assessment point of view, it is considered that both the proposed development and Centre Parcs are developments which offer overnight guest holiday accommodation in rural / countryside locations with the provision of on-site leisure facilities and access to local leisure facilities.
- 3.27 As such, it is considered valid to examine trip generation assessments relating to existing Centre Parc sites in order to gain an indication of the levels of trip generation the proposed development might result in. To this end, the planning applications for all five existing Centre Parcs locations have been examined.
- 3.28 The most recently opened Centre Parcs site is at Warren Wood near Flitwick, Bedfordshire having opened to the public in 2014. This development was consented under Central Bedfordshire Council Planning Ref: MB/05/01066/OUT in 2007.
- 3.29 The Transport Assessment that accompanied the Warren Wood application makes use of traffic survey data from the company's Elveden Forest site in Suffolk which has 822 units (with no on-site staff accommodation) and where traffic surveys were carried out on two days in August 2004. This showed that the 822 unit Elveden Forest Centre Parcs site generated a total of 3,301 vehicle trips on a changeover day and 1,613 vehicle trips on a non-changeover day. The relevant extract from the Warren Wood application Transport Assessment detailing traffic surveys at the Elveden site are included at Appendix F of this report).

- 3.30 On a pro-rata basis the proposed development at Moneystone Quarry (250 lodges) would generate 1,004 vehicle trips on a changeover day and 491 vehicle trips on a non-changeover day.
- 3.31 In contrast, Para 5.6.11 of the original application Transport Assessment suggested that on the busiest weekend day (assumed to be a changeover day) the development could generate 750 vehicle trips, while on the busiest weekday (assumed to be a non-changeover day) the development could generate 370 vehicle trips.
- 3.32 The traffic flow levels suggested in the Warren Wood application Transport Assessment are 33% greater than those suggested in the original application Transport Assessment. It is acknowledged that the Centre Parcs data is taken from a site where no on-site staff accommodation is provided, whereas Para 7.2.1 the Travel Plan that was submitted as part of the original Moneystone Quarry application suggests that some staff might live on-site. No details of the numbers of staff that might live on-site were given, as such any reduction in the forecasts set out above cannot be made.
- 3.33 It is also noted that when the applicant's traffic consultant had distributed total Saturday site traffic to the local road network, the total number of additional vehicle trips did not match what they suggested in Para 5.6.11 of the original Transport Assessment. Specifically, Para 5.6.11 stated that on the busiest weekend day the development would generate 750 vehicle trips. In contrast Figure 32 showed that there would be 554 additional vehicle trips per day on the A52 west of Whiston Eaves Lane, 229 additional vehicle trips per day on the A52 east of Whiston Eaves Lane (which totals 783 rather than 577 as shown on Figure 32) plus 126 additional vehicle trips per day on Carr Bank. This totals 909 additional vehicle trips per day – a figure 159 greater than the 750 as set out in Para 5.6.11.
- 3.34 In summary, the traffic generation assessment set out in the original application Transport Assessment failed to adequately assess vehicle trips made by guests during their stay, explain where day visitor vehicle trip information has been sourced or assess staff parking demand and hence staff vehicle trip generations. There was also inconsistency in the vehicle trip generation data within the text and figures of the report.
- 3.35 The findings of this chapter and the preceding chapter, have demonstrated that the proposed development site is not in a sustainable location and that the proposed development would lead to a significant increase in vehicle trips.
- 3.36 To illustrate this further, and to act as precedence for refusal of planning permission in the area, Staffordshire Moorlands District Council issued a refusal of planning permission for a single residential dwelling on land between Brook Cottage and the Sneyd Arms on the A52 adjacent to its junction with Whiston Eaves Lane. The application, under SMDC Ref SMD/2017/0148 was refused planning permission on 24/07/17. Reason 1 for refusal set out that:

'...the site is not considered to be in a sustainable location and would therefore lead to a significant increase in car journeys and therefore emissions to the

detriment of the environment. The proposal would therefore not be in line with para 49 or Section 10 'Meeting the Challenge of Climate Change...' of the National Planning Policy Framework (NPPF).'

- 3.37 The significantly larger Moneystone Quarry development proposal is positioned in an even less sustainable location than that of SMDC Application Ref SMD/2017/0148, and would generate significantly more car journeys and therefore emissions than SMDC Application Ref SMD/2017/0148 and as such should be refused consent for the same reason.
- 3.38 On the issue of vehicle emissions, members of the Whiston Action Group had requested details of forecast emission levels for the proposed development from Staffordshire County Council Highways and South Moorlands District Council. Whiston Action Group members reported that this information request had been refused.

4.0 A52 / WHISTON EAVES LANE JUNCTION

4.1 This chapter sets out an assessment of the proposed mitigation measures suggested by the applicant for the junction of the A52 with Whiston Eaves Lane as part of SMD/2014/0682.

4.2 Para 2.3.12 of the original Transport Statement set out that;

'Further to discussions with the SCC, it is proposed to implement improvements at the existing junction of Whiston Eaves Lane and the A52. Two options have been considered;

Option 1 - The provision of gateway traffic calming features on the A52 approaches to Whiston in each direction to slow traffic down and to raise awareness of drivers to the presence of the village and traffic turning into and out of Whiston Eaves Lane; The provision of a 'ghost island' layout at the junction of Whiston Eaves Lane and the A52, in order to provide a right turn waiting area for inbound vehicles from the west.

Option 2 - Introduce local narrowing along the A52 in the vicinity of the junction in order to improve lateral visibility.'

4.3 With regards to Option 1, the proposed layout is shown in Plan 8 of the original application Transport Assessment. It is unclear from this plan how the proposed facility would be provided within the existing junction layout.

4.4 Site visits carried out in August and September 2017 measured the width of the A52 opposite Whiston Eaves Lane as 8.0m (kerb to kerb) which provides a westbound lane of width 4.2m and an eastbound lane of 3.8m width.

4.5 The proposed layout would provide east and westbound through lanes of 3.0m width with a right turn lane of 2.5m giving a total junction width of 8.5m and would result in the reduction of width of the existing westbound through lane by 1.2m and the eastbound through lane by 0.8m.

4.6 The design of right turn lane / ghost island facilities is set out in Design Manual for Roads and Bridges, Volume 6: Road Geometry, Section 2: Junctions, Part 6, TD 42/95: Geometric Design of Major/Minor Priority Junctions (Dept. for Transport, January 1995). This details at Para 7.20 that

'At ghost island junctions, the through lane in each direction shall not be greater than 3.65m wide, exclusive of hardstrips, but shall not be less than 3.0m wide.'

4.7 TD 42/95 goes on to state at Para's 7.35 and 7.36 that:

'For new junctions, the desirable width of a ghost island turning lane shall be 3.5m, but a Relaxation to 3.0m is permissible. At urban and suburban junctions it can sometimes be advantageous to use a greater width not exceeding 5.0m to allow a degree of shelter in the centre of the road for large goods vehicles turning right from the minor road to execute the turn in two separate manoeuvres. On rural

roads, with design speeds above 85kph or where hardstrips are present, widths greater than 3.65m are inadvisable because wide ghost islands in these situations create a sense of space that could encourage hazardous overtaking at junctions.

For improvements to existing junctions where space is very limited a reduced width may be unavoidable. The width of ghost islands shall not be less than 2.5m.'

4.8 The proposed layout of the 'ghost island' facility would therefore comply with the through lane width requirement, and the absolute minimum turning lane width set out in TD 42/95. It is noted though that the recommended turning lane width for new junctions is 3.5m – considerably wider than the absolute minimum for existing junctions where space is very limited.

4.9 It is also worth noting that goods vehicles such as refuse vehicles and buses can have widths of around 2.5m. It is possible that such a vehicle may need to wait in the 'ghost island' area, taking up the full width of the 'ghost island' waiting area, while two other goods vehicles pass in opposite directions either side. In such a case, there could be as little as 0.25m clearance between vehicles which for passing traffic at speed leaves little room for manoeuvre. Figure JFRI shows an extract from Google Streetview to illustrate the width of the road at this location. The scale of the junction can be assessed by reference to the width of the bus stopped partially off road on the northside of the carriageway.

Figure JFRI. A52 / Whiston Eaves Lane Junction (looking east)



Source: Google Streetview Nov 2015

4.10 Para's 9.5.6, 9.6.4 and 9.6.5 of Royal Haskoning's original Transport Statement sets out that, due to comments from residents, and the findings of Road Safety Audit and Quality Audit carried out by Royal Haskoning, Option 1 (the introduction of a right turn lane ghost island facility) would not be pursued in preference for Option 2 which would introduce local narrowing along the A52 in the vicinity of

the junction. This however is in contrast to details contained with an e-mail from Jim Long of Staffordshire County Council Highways to Mark Lynch (Planning Officer) at Staffordshire Moorlands District Council dated 10/02/15 – a copy of which is presented at Appendix G. Within this e-mail Jim Long sets out that;

'As part of the application, the preferred option is to introduce a ghost island right turn on the A52, but it is also proposed that a Traffic Regulation Order (TRO) could be implemented by the Highway Authority, funded by the developer, to introduce a 30mph speed limit on the A52 in the vicinity of the Whiston Eaves Lane junction'

- 4.11 The issue of the proposed 30mph speed limit is discussed later in this chapter.
- 4.12 On the point relating to the original application Transport Assessment setting out a preference to not pursue the right turn lane option (Option 1), it must be noted that TD 42/95 at Para 2.16 states that:

'At existing rural, and at urban junctions the cost of upgrading a simple junction to provide a right turning facility will vary from site to site. However, upgrading should always be considered where the minor road flow exceeds 500 vehicles 2-way AADT, a right turning accident problem is evident, or where vehicles waiting on the major road to turn right inhibit the through flow and create a hazard.'

- 4.13 Figure 32 of the original Transport Statement showed that there would be 755 additional vehicle movements per day on Whiston Eaves Lane as a result of the development. Adding in existing traffic (as shown on Figure 33) would take the total number of vehicles on Whiston Eaves Lane to 1,258. This figure is 2.5 times the volume of traffic where the provision of a right turn lane is recommended by TD 42/95. The decision not to pursue the right turn lane option with flow levels of this volume questions how the junction without a right turn lane facility would operate.

- 4.14 Para's 6.4.13 to 6.4.15 of the original Transport Statement summarises the junction capacity assessment by means of TRL's PICADY assessment tool. Para 6.4.13 concluded by stating;

'For each potential layout the junction is forecast to operate in the With-Development scenario with demand is significantly less than the existing capacity during the assessed peak hours'

- 4.15 While the syntax of this sentence is ambiguous, the summary of capacity assessments set out in Appendix E of the original Transport Statement shows that demand (ratio of flow to capacity or RFC) for each 'with development' option is greater than existing. In this respect, the concluding sentence of Para 6.4.13 is misleading.

- 4.16 Additionally, it must be pointed out that the capacity assessments carried out as part of the original Transport Statement are based on trip generations which both Paul Mew Associates and the Inspector for the appeal of SMD/2014/0682 have

questioned as being lower than expected. With more realistic trip generations, the impact on junction capacity would be greater.

4.17 Turning to the proposed changes to the junction of the A52 with Whiston Eaves Lane set out in Option 2, the stop line on Whiston Eaves Lane would be moved to the north by means of kerb build-outs on the A52 both sides of Whiston Eaves Lane. The issue of sightlines is examined later in this chapter, but it is clear that the kerb build-outs would lead to a narrowing of through traffic lanes on the A52 along with a decrease in the kerb radii for vehicles turning left into Whiston Eaves Lane from the A52.

4.18 We can find no evidence that swept path analysis has been carried out to demonstrate how the revised junction layout would be able to accommodate vehicles. This point relates to both Option 1 and Option 2 and is also made by the Safety Audit Team in Section A3.1.1. of the Safety Audit presented at Appendix G of the original Transport Assessment which states that:

'Swept path analysis has not been provided to demonstrate that vehicles including HGVs / refuse vehicles, can adequately manoeuvre into / out of the revised junction without coming into conflict with opposing traffic. There is a risk of head-on collision should vehicles exiting the junction cross onto the opposing carriageway.'

4.19 With regards to sightlines, Section A2.1.1. of the Safety Audit presented at Appendix G of the original Transport Assessment states that for both options (Option 1 and Option 2):

'The proposed junction improvement option provides visibility splays based upon available visibility which is well below the standards required by DMRB TD 42/95 or Manual for Streets 2. Visibility at the junction is limited due to existing landscaping and walls.'

'On site observation suggests that vehicles may be travelling in excess of 40mph. Failure to provide adequate visibility may result in conflict as vehicles enter the main carriageway into the path of oncoming traffic.'

4.20 The recommendation in response to the above problem is identified in the Safety Audit as to;

'Carry out speed surveys in the vicinity of the proposed access to determine 85th percentile speed of vehicles on the A52 and provide amended visibility splay if required.'

4.21 There is no evidence that the applicant carried out speed surveys. As such, and as part of the preparation of this Highways Assessment Review, Paul Mew Associates carried out speed surveys in line with prescribed standards.

4.22 The speed surveys were carried out by means of a radar speed gun on Thursday 28th September 2017 in dry weather conditions during the off-peak period (10:00 to 16:00). A total of 200 speed readings of vehicles on the A52 approaching the

junction with Whiston Eaves Lane were recorded in each direction in free flow conditions.

4.23 The 85th percentile speed of traffic approaching the junction on the A52 from the east was found to be 42mph. The 85th percentile speed of traffic approaching the junction on the A52 from the west was found to be 36mph. Full results of the speed survey are presented at Appendix H of this report.

4.24 As part of the assessment of sightlines, the gradient of the approach has to be taken in to consideration. Paragraph 3.6 of TD 42/95 sets out that:

'The best locations for junctions are on level ground, or where the gradient of the approaches does not exceed 2% either uphill or downhill. Downhill approaches in excess of this figure, particularly on high speed roads, can induce traffic speeds above those desirable through the junction, and lead to a misjudgement of the approach speed by drivers entering from the minor road...'

4.25 Para 10.1.5 of Manual for Streets 2 (CIHT Sept 2010) goes further by setting out how road gradient data is incorporated in to the calculation of stopping site distance (SSD);

'The basic formula for calculating SSD (in metres) is:

$$SSD = vt + v^2/2(d+0.1a)$$

Where;

v = speed (m/s)

t = driver perception-reaction time (seconds)

d = deceleration (m/s²)

a = longitudinal gradient (5) + for up grades, - for down grades'

4.26 Appendix I shows an assessment of gradients along a section of the A52 from Froghall to a point north east of Whiston based on Ordnance Survey spot height information and the distance between successive spot heights. The gradient of the A52 on the immediate approaches of the A52 to the junction with Whiston Eaves Lane show that in both directions the A52 descends at a gradient of 6%.

4.27 To determine sightlines, an online sightline assessment tool has been utilised which permits the gradient of a road to be included in the calculation. The online tool assesses sightlines based on input criteria and if the 85th percentile speed is within the scope of Manual for Streets sightlines assessment (up to and including 37mph), the stopping sight distances prescribed in Manual for Streets are prescribed. If the 85th percentile speed is outside the scope of Manual for Streets sightlines assessment (more than 37mph), the stopping sight distances prescribed in TD 42/95 are prescribed.

4.28 Based on the surveyed 85th percentile speeds and road gradient, the sightline assessment tool suggests that visibility to the east from Whiston Eaves Lane should be 120m in dry conditions and 133m in wet conditions. To the west, the sightline assessment tool suggests that visibility should be 54m in dry conditions and 60m in wet conditions for light vehicles, and 61m in dry conditions and 69m in wet conditions for HGVs.

4.29 Appendix J shows these sightlines plotted on the existing junction layout. In all cases, sightlines over sail third party land and as such cannot be achieved.

4.30 The importance of meeting sightline requirements in the area, is illustrated in the planning consent notice for Staffordshire Moorlands District Council's planning consent SMD/2014/0676 for the 'part demolition of existing single storey extension, alterations to elevations and conversion of public house to training centre for dogs including office and living accommodation' at the former Sneyd Arms, Ashbourne Road, Whiston, Staffordshire ST10 2HZ which is located directly opposite Whiston Eaves Lane at its junction with the A52. Condition 6 of the planning consent notice sets out that:

'The development hereby permitted shall not be commenced until details of the 2.4m x 120m visibility splays in both directions from the western access and to the west from the eastern access have been submitted to and approved in writing by the Local Planning Authority. The visibility splays shall thereafter be kept free of all obstructions to visibility over a height of 900 mm above the adjacent carriageway level and be provided in accordance with the approved plan prior to the development being brought into use. Reason: - To comply with NPPF policies; to comply with SMDC policies; in the interests of highway safety. To safeguard visibility splays in the interests of highway safety.'

4.31 In this case the sightline requirement by the highways officer was 120m in each direction and while this related to the current 40mph speed limit, this site is on the outside of a bend in the A52 and as such it will enjoy longer sight lines than is afforded to traffic emerging from Whiston Eaves Lane which is on the inside of a bend of the A52.

4.32 Option 2, as proposed by the applicant would move the give way line on Whiston Eaves Lane north by a distance of approximately 2.2m. Appendix J also shows the sightline assessment with the kerb build-out. Again, in all cases, sightlines over sail third party land and as such cannot be achieved.

4.33 On a related matter, within the highways officer's recommendations prepared by Jim Long of Staffordshire County Council for the original 2014 application dated 03/02/15 (shown in Appendix K) it is stated that;

'The development hereby permitted shall not be commenced until an off-site traffic management scheme comprising, a 30mph speed limit on the A52 at the junction with the C0165, Whiston Eaves Lane'

4.34 There is no mention of the change of speed limit to 30mph in the original application Transport Assessment, but as mentioned above at Para 4.10 the 30mph speed limit change is detailed in an e-mail from Jim Long of Staffordshire County Council Highways to Mark Lynch (Planning Officer) at Staffordshire Moorlands District Council dated 10/02/15 – a copy of which is presented at Appendix G. This also references the preferred Option 1 (ghost island facility).

4.35 Assuming Option I and a 30mph speed limit, Paul Mew Associates have carried out a sightline assessment. As the section of road is currently subject to a 40mph speed limit it is not possible to obtain 85th percentile speeds for a 30mph speed limit at this location. As such it has been taken that the 85th percentile speed would be 30mph. Using the online sightline assessment tool referenced previously and the -6% gradient approach from both directions, the required stopping sight distances in each direction would vary from 41m for light vehicles in dry weather conditions to 52m for HGVs in wet weather conditions. Appendix J shows these sightlines plotted on the Option I layout. Even at this lower speed, none of the required sightlines can be achieved. It should be noted that the actual 85th percentile speed for a 30mph speed limit could be higher than 30mph which would result in greater sightline requirements. As such, reducing the speed limit in the area would not help the required sightlines to be achieved.

4.36 On this point, the e-mail from Jim Long (Appendix G) detailed above and his recommendations (Appendix K) both mention the change to 30mph. Informative 2 of his recommendations details that

'The proposed traffic management scheme referred to in condition 4 above requires an essential Traffic Regulation Order, to introduce a 30mph speed limit, for road safety mitigating works. This recommendation of approval should not be construed as though the County Council is prejudging of the Order making process. The developers should note that the Order will be made on behalf of the developer by Staffordshire County Council at the developer's expense and has to be secured before development commences as it is an 'ESSENTIAL' component of the required mitigating measures associated with the proposed development. In case the Order is not already being processed the developer is requested to contact Dale Arthur/Jim Long with immediate effect to enable the Order to be secured at the earliest convenience to avoid delays to implementation of the planning consent. Please note that there are no guarantees that the Order will be successful. Condition 4 also requires the implementation of a signage strategy to advise the permitted routeing for traffic accessing the Park will require the approval of the Highway Authority. The applicant is therefore requested to contact Network Management Unit at Staffordshire County Council, Staffordshire Place 1, Wedgwood Building, Tipping Street, Stafford, ST16 2DH (or email to nmu@staffordshire.gov.uk, to gain the relevant approvals.'

4.37 Whether the 'road safety mitigating works' referred to as the reason a 30mph speed limit should be introduced relate to reducing vehicle speeds such that improvements in sightlines are achieved, is not explicitly stated in the officer's recommendations but it should be noted that the Department for Transport's Circular 01/2013, 'Setting Local Speed Limits' (shown in Appendix L) sets out at Para 40:

'Speed limits should not be used to attempt to solve the problem of isolated hazards, for example a single road junction or reduced forward visibility such as at a bend...'

4.38 It should also be noted that any change to a speed limit is subject to a Traffic Regulation Order amendment process which consults relevant parties with the

final decision being taken by a cabinet meeting. As such there is no guarantee that the current speed limit of 40mph would be reduced to 30mph. The officer notes that there are no guarantees that the order will be successful.

- 4.39 In summary, the current layout of the junction of the A52 with Whiston Eaves Lane provides substandard sightlines. Neither of the layout options proposed by the applicant would improve sightlines sufficiently to meet the required distances. In addition, with the intensification in use of the junction relating to the proposed development, the issue of sightline provision is even more important. In terms of road safety, the options proposed by the applicant could increase the risk of collision as identified in the Road Safety audit.

5.0 TRAFFIC MANAGEMENT & PARKING LAYOUT

- 5.1 This chapter sets out and discusses various traffic management issues which are related to the proposed development or which are considered relevant to the proposed development, including access from Eaves Lane and parking layout

Access from Eaves Lane

- 5.2 The first of these relates to the junction of the proposed development site on Eaves Lane. As was highlighted in the refusal of planning consent for the original application (shown in Appendix A), officers were concerned about traffic from the proposed development using Eaves Lane towards Carr Bank / Alton Towers due to fact that it is a narrow and steep route with multiple bends.

- 5.3 In order to address this, the Section 106 Agreement that was prepared for the consented scheme sets out at Para 4, Section 1 that the applicant would:

'Not to Commence Development until a detailed design for physical measures to discourage vehicles turning right out of the access and on to Eaves Lane broadly in accordance with the Eaves Lane Access Plan together with the Access Enforcement Scheme has been submitted to and approved in writing by the Council.'

- 5.4 If such a facility were put in place and enforced / obeyed, the effects with the proposed development would be to increase further the volume of traffic passing through Whiston and the junction of Whiston Eaves Lane with the A52. This is due to the fact that as part of the Transport Assessment prepared for the original planning application, the trip generation / distribution assessment shown in Figure 32 assigned 126 additional vehicle trips per day on Carr Bank. With these vehicles prevented from turning right out of the site, they would instead have to turn left out of the site and proceed to Whiston village.

- 5.5 The applicant has not assessed the impact of the right turn ban in terms of additional traffic through the junction of Whiston Eaves Lane with the A52. Neither have details of how the facility would be enforced been provided.

- 5.6 As has previously been mentioned, Para 7.3 of the Supporting Planning Statement for the current reserved matters application sets out that;

Access into the development site was approved as part of the outline planning permission. The permitted access arrangements are for access from the existing access from Eaves Lane. A "no right turn" junction has been designed to prevent visitors from exiting the development onto Carr Bank. This would then ensure that traffic leaving the development would be directed to and from the site via the A52 to the north. The detail of these approved access arrangements can be seen on the following plans, approved and assessed by the outline planning permission: Eaves Lane Access Plan (PB5196-0100 rev C); and Proposed Layout of A52/Whiston Eaves Lane Junction (PBI608/SK001 rev C).

- 5.7 It is questioned as to how the statement that a 'no right turn' junction was approved as part of the outline consent is valid, when application ref: SMD/2016/0388 for the formation of a no right turn vehicular access on to Eaves Lane at Moneystone Park, Whiston was refused planning permission on 01/11/16. The layout of the proposed 'no right turn' junction submitted as part of SMD/2016/0388 is the same as that submitted as part of SMD/2016/0378 (both applications contain the same Plan PB5196 - 0100), and as such how can the same layout be both consented and refused planning consent? It should be noted that the one reason for refusal for SMD/2016/0388 stated that the proposal in isolation would be likely to lead to unsafe manoeuvres on the public highways and worsen highway safety. It is contended that the same reason should have been grounds for refusal of SMD/2016/0378.
- 5.8 Other traffic management issues considered apply to the wider A52 in the area. As shown in Appendix I, the A52 in the area is subject to a considerable number of sharp bends and significant gradients. Members of the Whiston Action Group have mentioned that on a regular basis, the A52 becomes blocked between Froghall and Whiston as heavy goods vehicle struggle to cope with gradients / tight bends and become stuck.
- 5.9 At present when these instances occur, motorists delayed by the road closure take evasive action to avoid the delays and route onto a wide network of narrow unclassified roads in the area which are unsuited to such increases in demand. With the increased flows in traffic on the A52 as a result of the proposed development, the impact on the wider minor road network when these instances occur, would be exacerbated.
- 5.10 Traffic management and specifically traffic reduction is the key aim of the Travel Plan for the proposed development as submitted as part of the original planning application.
- 5.11 Para's 7.2.1 and 7.2.2 of the Travel Plan submitted as part of the original planning application set out that;
- *Up to 50% of employees would live locally within the site, Whiston or Oakamoor and would be encouraged to cycle / walk to work through the Travel Plan*
 - *25% of employees would drive to work, with 25% travelling as car share passengers*
- 5.12 As detailed in Table I (earlier in this document) Census data shows that 90% of people who travel to work in the local area, do so as car driver. Achieving a reduction in this user group's mode split from 90% to 25% would be a significant achievement but it is questioned how such a significant reduction could be achieved given that the site is considered unsustainable in terms of its location and transport links as detailed in Chapter 2 of this report.

Parking Layout

- 5.13 The Supporting Planning Statement for the current reserved matters application sets out that at Para's 7.20 and 7.21 that;

Whilst previously the parking spaces adjacent to the lodges had been acknowledged as permanent spaces for private lodges and for loading / unloading spaces only for rental lodges, all car parking spaces adjacent to the lodges can now be used for the duration of the residents' stay. This therefore removes the necessity for a secure, long-stay car park, as cited in the TA and Condition 6 of the outline permission.

Given its extensive on-site facilities, the need for residents to leave the site, i.e. move their car, during their stay is limited. The primary benefit of using car parking spaces adjacent to the lodges for the duration of stay is the reduction of internal car trips, as residents will not be required to travel between their lodge and the car park. Reduced internal car trips provides safer routes for pedestrians and cyclists and is a benefit of the natural environment.

- 5.14 Within the second paragraph of this statement it is questioned as to how accurate an assessment this really is. Whilst guests may make use of the proposed on-site facilities, they will also be likely to want to visit local off-site attractions and town centres for shopping. Given that the distance between the site entrance and lodge locations under the current application will be greater than the distance between the site entrance and previously proposed central car park, there would actually be an increase in car trip lengths within the site, leading to increased pollution levels.

- 5.15 It is also possible that given the distant locations of outlying lodges (some are up to 950m from the hub building), guests may actually use their cars more to drive between their lodge and the hub building / other on-site facilities. To illustrate this, as part of parking studies carried out by Paul Mew Associates based on recognised methodologies, it is assumed that people are only willing to walk up to 200m from a parking space and their dwelling. Again, leading to increased car trip lengths and pollution levels.

- 5.16 On the issue of pollution, SMDC have recently adopted a new clean air policy to combat climate change. The policy has been implemented and currently has a ten-year duration. It is questioned how the impact of the scheme promoted under SMD/2019/0646, SMD/2016/0378 and SMD/2014/0682 with implications for increased emissions, sits with this newly adopted clean air policy.

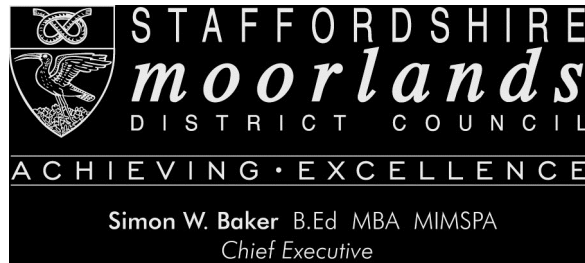
- 5.17 Lodges will be provided with one parking space, but it is likely that large family groups / groups of friends are likely to arrive in more than one car. This will lead to on-street / on-verge parking adjacent to lodges potentially blocking internal site routes for other users including emergency services.

6.0 SUMMARY & CONCLUSION

- 6.1 The proposed development site is not easily accessible by modes of transport other than the private car. Local public rights of way do not provide direct access to the site or follow likely desire lines for journeys to work by staff, or access / egress routes for guests. Local bus transport does not serve Whiston or the site itself, rather calling at bus stops 3 miles from the site with onward connection to the site being required on foot. Aspirations for a dedicated bus service between the site and Alton Towers and the reopening of a disused railway line are not supported by any formal agreements.
- 6.2 The traffic generation assessment set out in the original application Transport Assessment fails to adequately assess vehicle trips made by guests during their stay, explain where day visitor vehicle trip information has been sourced or assess staff parking demand and hence staff vehicle trip generations.
- 6.3 The current layout of the junction of the A52 with Whiston Eaves Lane provides substandard sightlines. Neither of the layout options proposed by the applicant would improve sightlines sufficiently to meet the required distances. In addition, with the intensification in use of the junction relating to the proposed development, the issue of sightline provision is even more important. In terms of road safety, the options proposed by the applicant could increase the risk of collision as identified in the Road Safety audit.
- 6.4 Traffic management measures (namely the introduction of a right turn ban at the site egress) will be difficult if not impossible to enforce and as such would result in additional traffic on Eaves Lane via Carr Bank to / from Alton Towers. If the right turn ban facility is obeyed it will lead to increased levels of traffic on Whiston Eaves Lane and through its junction with the A52. Such an increase has not been assessed by the applicant. An identical layout for the right turn ban junction consented under SMD/2016/0378 was refused consent under SMD/2016/0388 with officers stating that it would be likely to lead to unsafe manoeuvres on the public highway and worsen highway safety.
- 6.5 Article 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out that:
- Reserved matters applications deal with some or all of the outstanding details of the outline application proposals including... Means of access and covers accessibility of all routes to and within the site as well as the way they link up to the roads and pathways outside of the site.*
- 6.6 It is clear that the reserved matters application under the current submission fails to satisfy this requirement.
- 6.7 In conclusion, the proposed development under the current reserved matters application, being a resubmission of SMD/2014/0682 is considered to be inappropriate in terms of type and scale and would lead to unacceptable impact in terms of vehicle trip generation and impact. In addition, the site is unsustainable

in terms of non-car modes of transport. As such, the local planning authority should refuse planning consent.

Appendix A
Refusal of Planning Permission - Ref: SMD/2014/0682



Mr Jon Suckley
HOW Planning LLP
Peter Street
United Kingdom
M2 5GP

C/O Agent

Application no: SMD/2014/0682

Determined on: 2nd December 2015

**Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure)(England) Order 2015**

REFUSAL OF PLANNING PERMISSION

Location of Development:

Moneystone Quarry Whiston Eaves Lane Whiston Staffordshire ST10 2DZ

Description of Development:

Outline planning permission with all matters reserved except access for the erection of a high quality leisure development comprising holiday lodges; a new central hub building (providing swimming pool, restaurant, bowling alley, spa, gym, informal screen/cinema room, children's soft play area, café, climbing wall and shop); café; visitor centre; administration building; maintenance building; archery centre; water sports centre; equipped play and adventure play areas; multi-sports area; car parking, and managed footpaths and cycleways set in attractive landscaping and ecological enhancements.

Staffordshire Moorlands District Council in pursuance of powers under the above mentioned Act hereby **REFUSE** to permit the development described above in accordance with plans ref: PL1088.M.106 Rev 3, PL1088.M.110 Rev 3, PL1088.M.113 rev 2, PL 1088.M004 Rev 02, PB 1608-SK001 Rev B, PB1608-SK004 Rev E, for the reason(s) specified below:-

1. Notwithstanding the fact that this site is identified in the Churnet Valley Masterplan as an Opportunity Site for a high quality leisure venue with a maximum of 250 lodges, the Masterplan is clear in the Concept Statement for the Moneystone Quarry Opportunity Site at paragraph 7.6.5 that development needs to be of a scale which does not undermine the tranquillity and character of this sensitive part of the Churnet Valley. Policy DC 3 of the Adopted Core Strategy Development Plan Document requires the Council to protect and, where possible, enhance the local landscape. Policy SS7 refers specifically to development within the Churnet Valley and, whilst it provides support for visitor accommodation and the provision of new tourist attractions and facilities, it requires them to be both compatible with the area and to be of a scale and nature which conserves and enhances the landscape. It

further confirms that consideration of landscape protection will be paramount in all development proposals.

It is considered that within the area identified as Multi Activity Hub area on the submitted Parameters Plan the intensity of activity, the extent of built development (see indicative Schedule of Accommodation) and height of buildings (up to 12m in parts) would result in a development that was visually intrusive, particularly from the public footpath which runs directly to the west of this part of the site and in wider views from Eaves Lane to the north and from public footpaths to the west and east. It would fail to respond to and respect this small scale landscape which the Churnet Valley Landscape Character Assessment confirms to be particularly sensitive to change. Similarly the area identified as Black Plantation occupies an elevated location, visually and physically isolated from the remainder of the proposed development. In this location and notwithstanding the submitted Woodland Approach Notes setting out a proposed phasing approach to development within this woodland, it is considered that there is potential for development to be readily visible near the skyline in near and more distant views to the south. As such the proposal is in conflict with Policies DC3 and SS7 of the Adopted Core Strategy Development Plan Document, the Adopted Churnet Valley Masterplan SPD and the National Planning Policy Framework which seeks to protect and enhance valued landscapes.

2. The traffic generated from the proposed leisure development comprising up to 250 holiday lodges together with traffic generated from day visitors to the proposed leisure facilities would result in a significant increase in the amount of traffic accessing the surrounding rural road network and particularly Eaves Lane/ Carr Bank to the east of the site access which would provide a direct route from the development to Alton Towers and Farley Lane which links Oakamoor and Farley. It is considered that the increase in traffic would lead to unacceptable congestion on these narrow country roads. Carr Bank, for example is largely single track with limited passing places and a steep gradient as the road enters the village of Oakamoor. Although there is an offer to agree a signage scheme, an intention to run a shuttle bus to Alton Towers as part of a Travel Plan to be secured by way of planning obligation and improve the A52/Whiston Eaves junction, these measures would not prevent guests using the aforementioned rural routes. Furthermore guests from Black Plantation will be heavily reliant upon the car to access all facilities within the Hub area via the wider rural highway network given that it is physically detached and remote from the main venue with no pedestrian connectivity provided due to the change in levels in this area. It is for these reasons that it is considered that traffic from the proposal will not be satisfactorily accommodated on the highway network and that the proposal fails to provide and /or encourage satisfactorily the use of sustainable travel modes contrary to Policy T1 of the Adopted Core Strategy Development Plan Document.

3. The proposed development will have an adverse impact on the setting of Little Eaves Farm, a Grade II Listed building which lies to the west of the site. There will be direct views from this heritage asset to the south/south east into the Multi Activity Hub Area owing to gaps in existing planting. Although it may be possible to provide landscaping within this area to filter views, the exact siting of the buildings, their form, mass and design is unknown. The existence of overhead power lines crossing into the site will compromise the ability to provide effective screening and in any event planting will take many years to establish. In the wider

landscape there would be views of the heritage asset particularly from Whiston Eaves Lane, from the public footpath which runs through the site and from the site itself. In these views the asset would be read in conjunction with the proposed development which would erode the agricultural hinterland in which the asset is experienced. The close proximity of the asset to the central Multi Activity Hub Area would also result in loss of tranquillity and seclusion, elements which also make a positive contribution to the significance of the asset. Considerable weight has been given to the harm that would be caused to the heritage asset as required by section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 when carrying out that exercise. The harm is judged to be less than substantial in terms of paragraph 134 of the National Planning Policy Framework but it is not considered that the public benefits arising from the proposal outweigh the harm. As such there is conflict with Policy DC 2 of the Adopted Core Strategy Development Plan Document which seeks to safeguard and where possible enhance the historic environment.

4. Overall, the benefits of this leisure scheme when considered together would not be sufficient in this case to significantly and demonstrably outweigh the harm identified above contrary to Policies DC2, DC3, SS7 and T1 of the Adopted Core Strategy Development Plan Document; the Adopted Churnet Valley Masterplan SPD and the NPPF (National Planning Policy Framework)

Informatives

It is considered that the proposals are unsustainable and do not conform with the provisions of the NPPF.

Signed on behalf of Staffordshire Moorlands District Council

NOTES

1. If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
2. If the decision to refuse planning permission is for a householder application, and you want to appeal against your local planning authority's decision then you must do so within 12 weeks of the date of this notice. All other types of development have a 6

month deadline for submission of appeals. Appeals must be made using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or online at www.planningportal.gov.uk/pcs. The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order. In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

3. If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Appendix B
Paul Mew Associates Technical Note - 13/10/15



PAUL MEW ASSOCIATES

TRAFFIC CONSULTANTS

TECHNICAL NOTE

Project: P1302: Junction A52/Whiston Eaves Lane
Date: 13/10/15
Title: Moneystone Quarry – Junction Sight Line Assessment

Introduction

1 Paul Mew associates were instructed by the Whiston Action Group to provide an expert witness report on the suitability of the proposed junction improvements at Whiston Eaves Lane junction with the A52 to accommodate new traffic generated by the Moneystone Quarry redevelopment.

2 This report has been prepared by Paul Mew BSc, MSc, MCIHT, MCIT. Mr Mew is a registered Law Society expert witness and has given traffic evidence at many public enquiries including major developments of motorway service areas covering aspects such as junction design, junction capacity and road safety.

Sight Lines

3 Jim Long wrote to Mark Lynch at High Peak DC regarding sightlines stating that the proposed junction layout

'struggles to meet the standards set out in DMRB'

4 Brian Laird the Technical Director (Transport UK North) Infrastructure said

"although the layout of the junction is substandard the accident history does not indicate an inherent road safety issue".

5 Both agreed that the junction has substandard sight lines however because there have been no accidents and that a 30mph speed limit is to be introduced the design should be acceptable.

6 The applicant claims that a speed limit of 30mph can be introduced on the A52 however there is no guarantee that this speed will be achieved unless physical traffic calming such as road humps or chicanes are introduced and this would be unlikely for a road of this status, being an A road serving as a regional distributor road. In the absence of speed restraint measures it is usual to assume drivers will travel above the speed limit when designing visibility splays.



7 As there is no certainty that speeds will remain at or below 30mph, Manual for Streets 2 [MfS2] says that in 30mph speed limits the 37mph 85th percentile will generally be achieved [MfS2 10.1.3]. A speed of 37mph would require a visibility splay stopping sight distance of 59m [MfS1 Table 7.1]. The maximum achievable sightline to the right is 30m and to the left is 34m [Brian Laird Email to Staffordshire CC]. This is confirmed by a safety audit that was carried out. This document flagged up the poor sight lines as an issue. Paragraphs 9.6.3 states that

“the existing sight lines with a 2.4m setback are only 34m looking left from Whiston Eaves Lane and 30m looking right from Whiston Eaves Lane”

8 The Transport Assessment report in support of the application sets out how sight lines could be improved and 2 options are proposed;

9 Option 1 proposes a 30mph speed limit and a right turn lane that improves sight lines to the left to 49m with sight lines to the right remaining at 30m. The right turn lane is considered necessary to meet the mandatory requirement that a right turn lane should be considered where the two-way flow of traffic on the minor road (Whiston Eaves Lane) exceeds 500vpd as would be the case with the proposed development. [DMRB TD42/95]

10 Option 2 proposes a kerb build out with a narrowing of the A52 however no right turn lane is provided in this option. With this option there is no scope to provide a pedestrian refuge or footway along the northern side of the A52 adjacent to the public house. This option bring the give way line further forward and as such has a visibility of 45m to the left and 53m to the right. If this scheme is considered viable it could almost achieve the visibility criteria set out in Manual for Streets provided that the 85th percentile speeds can be reduced to 37mph. Further information is required to justify why a right turn lane, although considered necessary for the first option was dropped for the second option. Discussion should also be provided on the lack of footpath and pedestrian crossing in this option.

11 Option 1 is favoured and this design is for a right turn lane. However as said, it does not improve sight lines looking to the right from Whiston Eaves Lane. Visibility to the right is especially important where approaching vehicles on the A52 are approaching the junction down a fairly steep hill and would be hidden from the view of a driver turning out of Whiston Eaves Lane until only 30 metres away.



12 The safety audit flagged up the limit that is placed on forward visibility created by the wall on the south side of the A52 to the east of the junction (looking right from Whiston Eaves Lane)

13 It is accepted that there have been no reported personal injury accidents in the 5 year period studied however it is a fact that reported injury accidents are rare events and for this reason it is very difficult to correlate accidents and substandard visibility.

14 The proposed Moneystone Quarry development would significantly increase traffic using Whiston Eaves Lane introducing new drivers to the junction where visibility distance to the right is around half of that recommended by Manual for Streets. The Royal Haskoning Transport Assessment Report dated October 2014 advised that

'the proposed development will generate a significant increase in traffic flow at this junction'. At paragraph 9.6.3 it is stated that 'the increase on Whiston Eaves Lane will be 150%. On the west arm of the A52 the increase will be 20% and on the east arm of the A52 the increase will be 9%'. These are all significant increases.

15 In summary, while it is reasonable to apply some common sense to the interpretation of design standards, the achievable sight lines are so far below standards that it is a serious safety concern to consider loading more traffic onto a substandard junction that is not capable of providing reasonable sight lines. By doing so the risk of injury accidents occurring would increase.

Sneyd Arms

16 The decision notice for planning consent that was granted for a development on the Sneyd Arms pub site for dog training. This is a relatively minor traffic generator however the applicant's consent was conditioned such that they have to safeguard a visibility distance of 120m along the A52 in the interests of highway safety. [Condition 6 of planning consent decision letter SMD/2014/0676]. Obviously this requirement is based on a speed limit of 40mph and that visibility meets the DMRB stopping distance for a speed of up to 44mph. It does illustrate that speed and sightlines are taken to be an important consideration along this stretch of road and that the appropriate stopping sight distances should apply.

17 This site is on the outside of a bend in the A52 and as such it will enjoy longer sight lines than is afforded to traffic emerging from Whiston Eaves Lane which is on the inside of a bend of the A52. I regard this sightline requirement as setting an important precedent for later planning applications, that sightline standards should be rigorously applied.

18 In summary the proposed development will add new traffic to a junction where visibility is poor and falls well short of the required standard for highway safety. As such the junction should not be used to access the proposed development.

Appendix C
Christie & Co Trip Generation Assessment

APPENDIX D

Data from Christie & Co.

Numbers visiting Moneystone - Extracts from Christie + Co Feasibility Study

Typical options are three nights for a weekend booking, four nights for a midweek booking or seven nights for a full week booking.

We anticipate that it will take five years for the Resort to build up to a stabilised level. Our projections show a stabilised occupancy of 67% in year five - which equates to 61,137 occupied lodge nights per year.

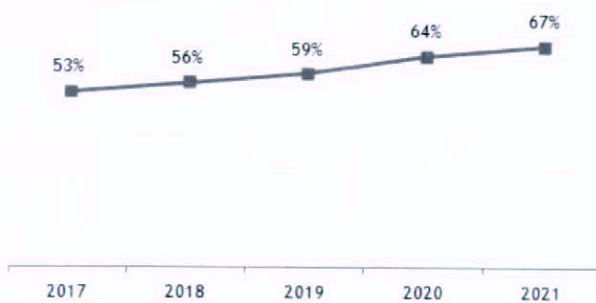
Assuming there is an average of four guests per lodge, this equates to a total of 245,348 annual guest nights being accommodated within the Resort.

During times of peak demand, when all units are occupied, there could be a maximum of 1,300 guests on site, excluding staff.

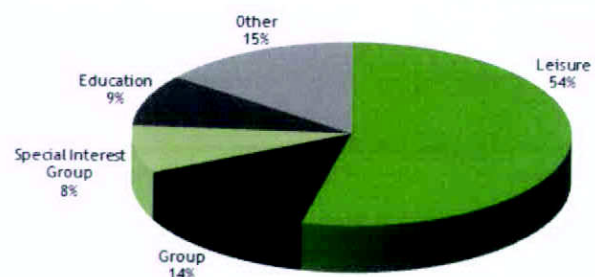
Lodge/Cottage	#	Season:	Average Quoted Weekly Tariffs (including VAT)				Weighted Average	Average Nightly	Net Average Weekly Rate	Net Average Nightly Rate
			Low	Medium	High	Peak				
		Available weeks:	6	23	16	7				
		Sold weeks:	6	10.5	11.5	7				
1 Bed (Sleeps 2)	33		£553	£650	£748	£975	£730	£104	£609	£87
2 Bed (Sleeps 4)	95		£602	£708	£814	£1,062	£795	£114	£663	£95
3 Bed (Sleeps 6)	82		£689	£810	£932	£1,215	£910	£130	£758	£108
4 Bed (Sleeps 8)	26		£901	£1,060	£1,219	£1,590	£1,191	£170	£992	£142
5 Bed (Sleeps 10)	8		£1,105	£1,300	£1,495	£1,950	£1,461	£209	£1,217	£174
6 Bed (Sleeps 12)	6		£1,275	£1,500	£1,725	£2,250	£1,685	£241	£1,404	£201
Total/Average	250		£687	£808	£930	£1,213	£908	£130	£757	£108

Source: Christie + Co Research and Analysis

Projected Occupancy build up



Project Stabilised Market Mix



Illustrative calculation of number of day visitor' vehicles:

Illustrative Year	W/c Saturday	Lodges Occupancy	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday
Jan	31-Dec-16	52%	75	25	25	25	25	25	25
	07-Jan-17	52%	25	25	25	25	25	25	25
	14-Jan-17	52%	25	25	25	25	25	25	25
	21-Jan-17	52%	25	25	25	25	25	25	25
	28-Jan-17	52%	25	25	25	25	25	25	25
Feb	04-Feb-17	52%	25	25	25	25	25	25	25
	11-Feb-17	74%	75	75	75	75	75	75	75
	18-Feb-17	59%	50	25	25	25	25	25	25
	25-Feb-17	58%	25	25	25	25	25	25	25
Mar	04-Mar-17	58%	25	25	25	25	25	25	25
	11-Mar-17	58%	25	25	25	25	25	25	25
	18-Mar-17	58%	25	25	25	25	25	25	25
	25-Mar-17	58%	25	25	25	25	25	25	25
	01-Apr-17	58%	25	25	25	25	25	25	25
Apr	08-Apr-17	74%	150	150	50	50	50	50	50
	15-Apr-17	71%	150	150	50	50	50	50	50
	22-Apr-17	58%	125	125	25	25	25	25	25
	29-Apr-17	58%	125	125	25	25	25	25	25
May	06-May-17	63%	150	150	25	25	25	25	25
	13-May-17	63%	150	150	25	25	25	25	25
	20-May-17	63%	150	150	25	25	25	25	25
	27-May-17	74%	150	150	150	25	25	25	25
Jun	03-Jun-17	63%	175	175	25	25	25	25	25
	10-Jun-17	63%	175	175	25	25	25	25	25
	17-Jun-17	73%	175	175	25	25	25	25	25
	24-Jun-17	73%	175	175	25	25	25	25	25
Jul	01-Jul-17	85%	175	175	25	25	25	25	25
	08-Jul-17	85%	175	175	25	25	25	25	25
	15-Jul-17	85%	175	175	25	25	25	25	25
	22-Jul-17	96%	200	200	100	100	100	100	100
	29-Jul-17	96%	200	200	100	100	100	100	100
Aug	05-Aug-17	96%	200	200	100	100	100	100	100
	12-Aug-17	96%	200	200	100	100	100	100	100
	19-Aug-17	96%	200	200	100	100	100	100	100
	26-Aug-17	96%	200	200	100	100	100	100	100
Sept	02-Sep-17	73%	150	150	25	25	25	25	25
	09-Sep-17	63%	150	150	25	25	25	25	25
	16-Sep-17	63%	150	150	25	25	25	25	25
	23-Sep-17	59%	125	125	25	25	25	25	25
Oct	30-Sep-17	59%	125	125	25	25	25	25	25
	07-Oct-17	59%	125	125	25	25	25	25	25
	14-Oct-17	59%	25	25	25	25	25	25	25
	21-Oct-17	59%	25	25	25	25	25	25	25
	28-Oct-17	74%	75	75	75	75	75	75	75
Nov	04-Nov-17	58%	50	25	25	25	25	25	25
	11-Nov-17	58%	25	25	25	25	25	25	25
	18-Nov-17	58%	25	25	25	25	25	25	25
	25-Nov-17	58%	25	25	25	25	25	25	25
	02-Dec-17	58%	25	25	25	25	25	25	25
Dec	09-Dec-17	58%	25	25	25	25	25	25	25
	16-Dec-17	58%	25	25	25	25	25	25	25
	23-Dec-17	95%	75	75	25	25	25	25	25

Average no. vehicles	101.44	101.44	40.87	36.54	36.54	36.54	36.54	36.54	36.54
Min	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00
Max	200.00	200.00	150.00	100.00	100.00	100.00	100.00	100.00	100.00

Note: Day visitor visitation was not part of our Feasibility Study analysis therefore the above is calculated based on assumptions supported by evidence of comparable parks elsewhere.

Note: Day visitation is likely to be highly dependent on weather

Appendix D
Local Census 2011 'Journey to Work' Data

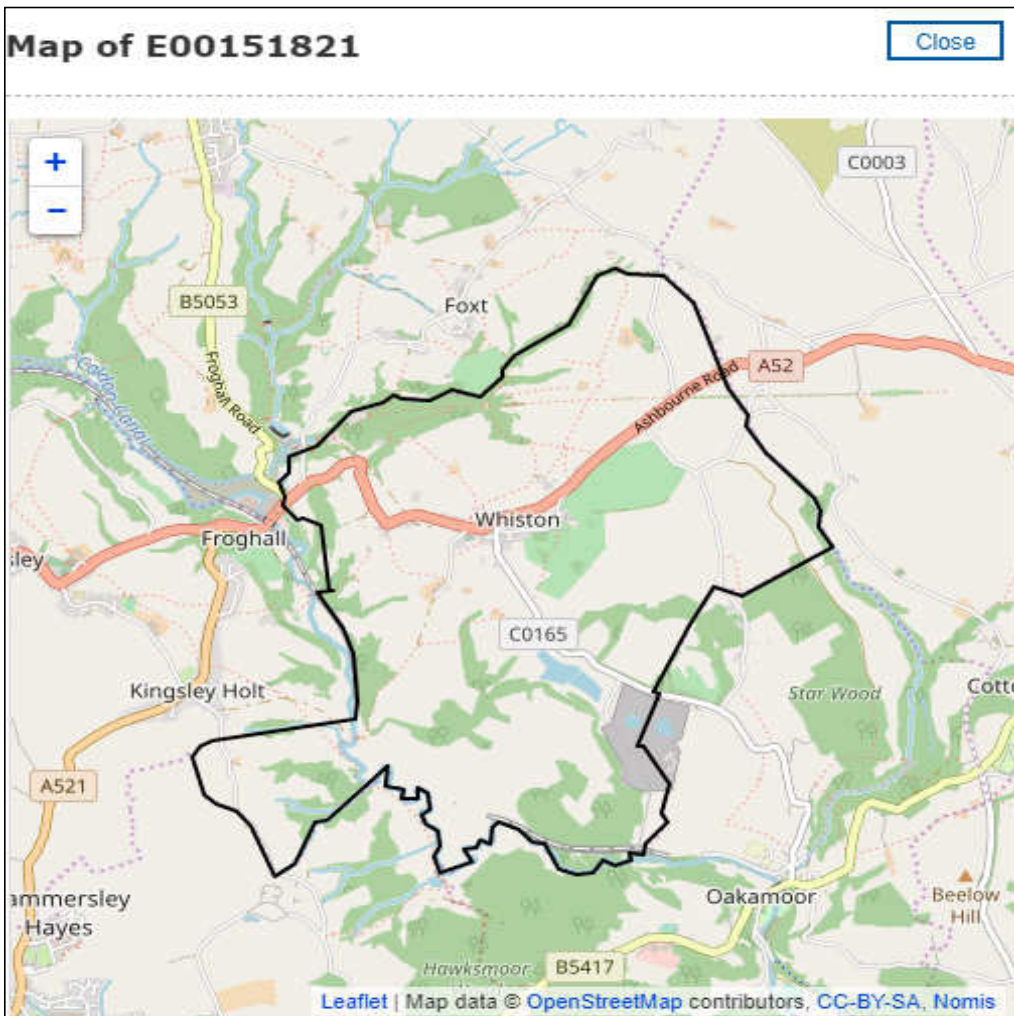
QS703EW - Method of Travel to Work (2001 specification)

ONS Crown Copyright Reserved [from Nomis on 6 September 2017]

population All usual residents aged 16 to 74
 units Persons
 area type 2011 output areas
 area name E00151821

Method of Travel to Work	Persons	Mode Split	Persons for Development
All categories: Method of travel to work	281		
Work mainly at or from home	44		
Underground, metro, light rail, tram	0	0%	0
Train	0	0%	0
Bus, minibus or coach	0	0%	0
Taxi	0	0%	0
Motorcycle, scooter or moped	0	0%	0
Driving a car or van	132	90%	226
Passenger in a car or van	10	7%	17
Bicycle	2	1%	3
On foot	2	1%	3
Other method of travel to work	0	0%	0
Not in employment	91		
Total (those to who travel to work)	146	100%	250

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.



Appendix E
Pre-Inquiry Meeting Minutes – 27/07/17



NOTES OF THE PRE-INQUIRY MEETING

Held at

The Churnet Room, Moorlands House, Stockwell Street, Leek, ST13 6HQ

on

Thursday 27 July 2017 at 10.00hrs

relating to 2 separate proposals made by:

Laver Leisure (Oakamoor) Limited

1. for a high quality leisure development, with all matters except the means of access reserved for subsequent approval, and entailing (250) holiday lodges; a new hub building (providing a swimming pool, restaurant, bowling alley, spa, gym, informal screen and cinema room, children's soft play area, café, climbing wall and shop); and a café, a visitor centre, an administration building, a maintenance building, an archery centre, a water sports centre, equipped play and adventure play areas, a multi-sports area, car parking' managed footpaths and cycleways set in attractive landscaping, together with ecological enhancements, all at Moneystone Quarry, Whiston Eaves Lane, Whiston, Staffordshire
- &
2. a scheme for the formation of a 'no right turn' vehicular access on to Eaves Lane at what is described as Moneystone Park, Whiston, Staffordshire

Contents

This note includes sections:

- setting out some *background information*;
- listing the *participants* expected at the Inquiry;
- detailing *when Proofs of Evidence* should be *submitted*;
- indicating *procedures* to be followed and a provisional *timetable* for the Inquiry, and
- providing some *guidance in relation to the evidence* required.

If any matter remains unclear, clarification should be sought via the Case Officer, Helen Skinner, The Planning Inspectorate, Major Casework, Rm 3/O Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN, ☎ 0303 444 5531 email: helen.skinner@pins.gsi.gov.uk

1. Introduction & background

The inquiry is due to open on **Tuesday 7 November 2017**

And is currently expected to take place in

The Council Chamber at Moorlands House, Stockwell Street, Leek, ST13 6HQ

The Inspector will be - **David Cullingford** BA MPhil MRTPI.

The planning appeal ref. is: APP/B3438/W/16/3144848

The planning application ref. is: SMD/2014/0682

- 1.1 The Inquiry will not need the benefit of a Programme Officer, but the Council have helpfully offered to provide someone to assist with photocopying and, perhaps, with the inquiry library and attendance lists.
- 1.2 As indicated at the Pre-Inquiry Meeting, the appellants, Laver Leisure (Oakamoor) Limited, have written (dated 28 July 2017) to formally withdraw the planning appeal ref: APP/B3438/W/17/3170628 in respect of the proposal for the formation of a 'no right turn' vehicular access on to Eaves Lane at Moneystone Park, Whiston, Staffordshire. Hence, the Inquiry will not be considering this proposal as a 'stand-alone' scheme. However, because the Statement of Common Ground between the Council and the appellants (dated 25 July 2017) indicates, as one of the agreed modifications to the appeal proposal, the formation of a 'no right turn' vehicular access on to Eaves Lane, this intended modification will be considered in connection with the leisure scheme as a whole.

The need for EIA

- 1.3 As you know, the 'high quality leisure' proposal was accompanied by an Environmental Statement as required by the Screening and Scoping Opinions issued by the Council on 25 January 2011 and 9 October 2014 (respectively) in accordance with the then relevant versions of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations:
 - In accordance with the Regulations the Environmental Statement addresses:
 - Social and economic effects,
 - Landscape and Visual Impact Assessment,
 - Ecology and Nature Conservation,
 - Archaeology and Heritage,
 - Ground Conditions,
 - Water Resources and Flood Risk,
 - Transport and Access,
 - Air Quality and Dust,
 - Noise and Vibration, and
 - Waste
 - There is also:
 - A supporting Planning Statement,
 - A Design and Access statement,
 - A Feasibility Study,
 - A Sustainability Statement and Energy Strategy, and
 - An overall Illustrative Masterplan that shows how 250 lodges could be laid out across the site together with a Parameters Plan setting out broad development areas and height limits.
- 1.4 Updated information has been submitted in June and October 2016 and advertised in accordance with Regulation 19.
- 1.5 All that information is available at the Council offices (though it would be helpful to make suitable arrangements to see it in advance of arriving at the offices) and on the Council's website under planning applications with the reference SMD/2014/0682.

2. *Inquiry Participants*

2.1 At this stage the main participants at the Inquiry are likely to be those listed in table 1 (see below), that is the appellants, the Council and 3rd parties. It is accepted that the number of witnesses indicated in the table is currently provisional and could differ at the Inquiry.

Those making oral representations

2.2 The provisional Inquiry timetable (see table 2) is designed to accommodate those 3rd parties (ie those with Rule 6 status and local people) that I currently expect to speak at the Inquiry. There may be others that I do not yet know about. Anyone wishing to make oral representations to the Inquiry who find that they are not listed in table 1 should indicate that they wish to do so either by writing a letter to reach the Case Officer (as above) 4 weeks before the start of the Inquiry (that is by **Tuesday 10 October 2017**) or by attending the opening session to give their names. The Rule 6 parties have already submitted their 'statements of case': it would be helpful if others wishing to speak could provide the gist of what they want to say in their letters to the Case Officer. Those unable to provide a written indication of what they want to say in advance of the Inquiry may still indicate their intention to speak at the start of proceedings. However, an indication of what they want to say in advance of their oral evidence will be necessary and a written statement would be helpful. Subject to following the appropriate procedures and meeting the requirements set out in this note, I usually like to hear from anyone who has a relevant point to make; I will aim to accommodate them in the Inquiry timetable. However, the points made must be relevant. I shall prevent repetition and inappropriate submissions.

Rule 6 parties

2.3 There are 5 parties awarded Rule 6 status in this case and they are entitled to present evidence and ask questions relating to the evidence presented by the witnesses of opposing parties; they may also make a short opening statement outlining their case and present a closing submission summing up how their case has been affected by the evidence heard at the Inquiry. Of course, there is some overlap between the cases likely to be presented, but there are also differences in emphasis and subject matter. It would be helpful (and more effective) if, through cooperation, repetition could be prevented and a special focus for each case fostered. In any case, I will not allow the same question to be put to the same witness repeatedly, even with slightly different phrasing. It might be possible to cooperate under the umbrella of a single advocate making a single opening and closing submission and organising the questioning of opposing witnesses. Or it may be that one party could present all the common themes and others concentrate on more specialised aspects. For example, on the basis of the submitted 'statements of case':

- Common themes might include – the relationship of the scheme to Core Strategy policies and the proposals in the Churnet Valley Masterplan SDP; the nature and condition of the local roads; visitor estimates and the residents of local villages;

- Specialised aspects might include – the relationship between the estimated traffic and the forecasts of visitors set out in the ‘feasibility ‘study’; the implications of other Transport Assessments; the impact on specific villages; the effects of Alton Towers and other mooted developments; junction arrangements and the advice in DMRB; the effects of instigating a ‘no right turn’ on to Eaves Lane; responding to emergencies; ‘sustainable transport’ possibilities; landscape assessments, the mooted AONB and the Churnet Valley Masterplan; any impact on ‘ancient woodland’; the effects of the scheme on Conservation Areas and Listed Buildings (including those the subject of rebuilding conditions); archaeological considerations; and, possibly, matters of procedure.

- 2.4 But, there are other ways of cooperating and, in any case, the themes indicated above are not exhaustive. It is for the Rule 6 parties to cooperate in a way that they believe best presents their case and to ensure that their contributions foster the efficiency and effectiveness of the Inquiry. I will seek to ensure that that is what happens.
- 2.5 Opening statements should be short and succinct and outline the case in about 15 minutes or less. Closing submissions should be simple position statements showing how the case stands in the light of all the evidence heard at the Inquiry; save for the very rare exception of the occasional legal case, they should refer only to matters aired or submitted to the Inquiry. Questions to opposing witnesses are more effective if kept short, succinct and simple. It may be useful to query facts or to question the basis of an expressed opinion or judgement: it is almost never helpful to seek to change an opinion expressed by a witness, and I may intervene to prevent such questioning.
- 2.6 In view of the matters agreed in the Statement of Common Ground (25 July 2017) between the Council and the appellants, Rule 6 parties may have questions to put to the Council’s witness as well as to those witnesses supporting the case for the appellants. Because the Council’s witness will be presenting evidence early in the Inquiry programme, it may be more effective to explore the basis on which the Council has reached agreement with the appellants on certain aspects of the scheme while addressing the technical details and the merits of the evidence in support of the proposal with the appellants’ witnesses. Although there will be exceptions, that should, as a general rule, prevent unnecessarily covering the same ground with different witnesses.

Webcam of the committee meeting

- 2.7 I have seen large parts of the webcam recording of the planning committee meeting held on 17 December 2015 when the leisure scheme was refused planning permission. I do not think that this recording would provide appropriate evidence to be submitted during Inquiry proceedings. This is partly because the detailed discussion informing the process by which a planning committee comes to a decision on the basis of an officer’s report is very rarely a proper focus for addressing the merits of a planning proposal. More importantly, some of the submissions made in connection with the committee meeting seek to make personal

criticisms of the County Council's officers in attendance. Such personal criticism will be completely out of place at this Inquiry and it will not be permitted. Disagreements about the judgements made, backed by evidence, are quite different and they are a legitimate focus for the Inquiry. So, the merits of the case and the justifying evidence, as perceived by each party at the Inquiry, are the important foci, rather than personal complaints and criticism of others proffering a different view.

Table 1: Provisional list of the main participants

Participants	Represented by:	Address	No. of witnesses & gist of subjects likely to be covered	
<i>Laver Leisure (Oakamoor) Limited</i>	Paul Tucker QC Assisted by: Killian Garvey of Counsel	Kings Chambers, Manchester	4	i. Kevin Riley <i>highways and traffic</i> ii. John Berry <i>landscape</i> iii. Rob Smith <i>heritage</i> iv. Jon Suckley <i>planning</i>
	Instructed by: Jon Suckley MTPC MRTPI	HOW Planning LLP 40 Peter Street, Manchester, M2 5GP		
Staffordshire Moorlands District Council	Hugh Richards of Counsel Instructed (I think) by: Paul Rushworth, Legal Services, Staffordshire Moorlands District Council	No.5 Chambers, Birmingham	1	i. Ben Haywood <i>planning</i>
Rule 6 Parties				
Peter Cowie	Peter Cowie	Warrilow House, Foxt, ST10 2HN	2	Peter Cowie Cllr Ivan Lucas <i>Roads, traffic, visitors and feasibility study, heritage</i>
Paul Housiaux	Paul Housiaux	5 Whiston Eaves Lane, Whiston, ST10 2JB	4	Paul Housiaux Nick Cresswell Ivan Kent Paul Mew <i>Planning policy, landscape, visitors and villages, Conservation Areas, junction arrangements – safety and feasibility, traffic, heritage, procedures</i>
Churnet Valley Conservation Society	David Walters	3 The Island, Mill Road, Oakamoor, ST10 3AG	2	?? <i>Planning policy and permissions, landscape, ecology, ancient woodland, traffic, sustainability, heritage</i>

Participants	Represented by:	Address	No. of witnesses & gist of subjects likely to be covered	
Ipstones Parish Council	Cllr John Williams	High View, Foxt, ST10 2HN	2	?? <i>Traffic and traffic assignments, junction arrangements and standards, effects of Alton Towers and other development sites, landscape</i>
Kingsley Parish Council	Cllr John Steele	The Hazles, Hollins Lane, Kingsley, ST10 2EP	4-5	John Steele David Fowler ?? <i>Planning policy, landscape, visitors and villages, effects of Alton Towers, Conservation Areas, junction arrangements – safety and feasibility, traffic, heritage</i>
Other Parties who are currently expected to speak				
Oakamoor Parish Council	Cllr Jeff Wood	22 Appledore Grove, Packmoor, ST6 6XH	1?	?? <i>Planning policy, landscape, visitors and villages, effects of Alton Towers, traffic</i>
Roger Carter	Roger Carter	14 Broomfields, Biddulph Moor, ST8 7JJ	1?	?? <i>Size of lodges, stability of quarry, woodland, landscape, local road system</i>
Alison Conybeare	Alison Conybeare	The Old Post Office, Whiston, ST10 2JB	1?	?? <i>Planning policy and planning permissions, quarry restoration, traffic, highway standards, heritage</i>
TOTALS				
10			23	

3. Submission of evidence

Statements of Case

3.1 I now have the **Statements of Case** on behalf of the following parties:

- Laver Leisure (Oakamoor) Limited
- Staffordshire Moorlands District Council

And from the 5 Rule 6 parties:

- Peter Cowie
- Paul Housiaux
- David Walters ~ Churnet Valley Conservation Society
- Cllr John Williams ~ Ipstones Parish Council
- Cllr John Steele ~ Kingsley Parish Council

3.2 I also have the Statement of Common Ground between the Council and the appellants (dated 25 July 2017) which indicates agreed modifications to the appeal scheme, of which more later.

3.3 I have received (by early May 2016) some 90 letters, statements or emails from local people in relation to this leisure proposal. All but 2 of those representations raised objections to the scheme. I shall also take account of the 342 representations made by 3rd parties opposing the proposal and the 16 representations in support submitted in connection with the application; the main issues raised are listed in the Planning Officer's careful report.

Proofs of Evidence Written Statements & Documents

3.4 Proofs of evidence, all written statements (including any 'position statement') and any further 'Statement of Common Ground' must be exchanged between parties or submitted to reach the Case Officer by **Tuesday 10 October 2017**. Each proof should be accompanied by appendices consisting of any document relied on (or relevant extracts from such a document) and any technical matter or data. However, a simple reference (in the text, or as a footnote, or in the margin) to common Government policy documents, to any of the documents available to the Inquiry (such as proofs of evidence) and to any of the listed core documents will suffice. Government policy documents should be named, proofs denoted by the writer (eg Haywood or possibly BH) and core documents referenced in accordance with the list (eg CD14). Where necessary, a page or paragraph number might follow the reference. Inevitably, some documents will be handed in during the course of the Inquiry; they will form an accumulating list with the prefix ID.

3.5 Proofs of evidence and numbered appendices should all have page numbers and, if possible, all the pages should be numbered sequentially in a single sequence. Proofs should have a contents page at the front and any proof much over 1500 words should be accompanied by a **short summary** to be available when witnesses give their evidence; it is helpful if the 'summaries' could be carefully prepared to incorporate the salient points of each case. At the inquiry I will expect only the 'proof summaries' (or short proofs) to be read, subject to allowing any particularly difficult

matter to be explained or additional points arising from opposing proofs to be addressed.

- 3.6 The current list of **Core Documents** is appended to this note. It will be kept up to date by the Council and the appellants. Requests from Rule 6 and other 3rd parties to include additional documents in the core document list will be considered, though the document should be a genuine 'core document' and be widely relevant to the Inquiry. Documents relevant to a specific point or issue made in a particular proof are not 'core documents'.
- 3.7 We shall need at least **12 copies** of all proofs of evidence and associated appendices; that is one copy for each party currently expected to attend the Inquiry, one copy for the **Inquiry Library** and one copy for me. Of course, additional copies could well be useful. The Inquiry Library should be available for inspection at the Council Offices at all reasonable times about 3 weeks before the start of the Inquiry. (Please telephone to check availability first.) The Inquiry Library will provide a clean set of proofs and documents from which photocopies can be made when necessary and provide a resource for inspection by members of the public at the Inquiry venue. I assume too that further documents, proofs of evidence and appendices will be added to the Council's website when they become available and will be viewable under the reference SMD/2014/0682.
- 3.8 Whatever arrangements participants make amongst themselves, I would be grateful if the proofs and documents both for the Inquiry Library and for me were to be bound or organised into ring binders, so that they stand up in a document box and are robust enough to be handled easily. Pages should be printed on one side only and plans, diagrams and photographs should match the original in colour and size; A3 pages being folded to A4 and larger pages folded to fit inside an A4 plastic envelope.
- 3.9 Because those requirements are likely to be onerous for Rule 6 and other 3rd parties, I suggest that they submit their proofs and appendices to the Case Officer by email as they have been doing hitherto; I will risk the consequences. However, if there are key plans, diagrams or photographs that I should see, it would be helpful if 3 copies of the originals could be brought to the Inquiry.

Statements of Common Ground

- 3.10 A '**Statement of Common Ground**' between the Council and the appellants has already been produced (25 July 2017). This very helpfully gives a clear indication of those matters where agreement has been reached and, making it available well in advance of the Inquiry should be of benefit to everyone. The 'statement' concerns only the Council and the appellants. It does not imply any agreement from any 3rd party. However, objectors may find the 'statement' useful in helping to focus their objections on the crucial elements of concern to them.
- 3.11 The 'statement' provides a record of what has been agreed by 25 July 2017. The document itself will not be altered. However, there may be subsequent 'statements' if further areas of agreement emerge and there could be similar 'statements' between either the Council or the appellants and any 3rd party, if appropriate.

Supplementary proofs

3.12 The early 'Statement of Common Ground' and the gestation period over which the issues involved in this appeal have been scrutinised should make it unnecessary to prepare **supplementary proofs** of evidence and accompanying documents to respond to particular evidential points at the Inquiry. However, I accept that that cannot be guaranteed and I realise that where evidence is related to some on-going research (perhaps into traffic generation), it may well be necessary to inform the Inquiry about the latest developments. **The crucial requirement is that opposing parties should have an adequate opportunity to see and respond to such evidence.** Given the circumstances that apply here, I think that adequate provision would be made, provided any supplementary proof of evidence were to be submitted when the Inquiry opens. All supplementary proofs must meet the requirements set out in paragraph 3.8 above. And, there must be a copy for me, for the Inquiry Library and for each opposing party.

Lists and electronic data

3.13 Lists of advocates, witnesses and their qualifications, together with time estimates for each case should be sent to the Case Officer by 17 October 2017. I currently think that the initial 4-day duration estimated for this Inquiry will not suffice (see table 2). And, there is a possibility that more than one further day may be necessary. But, providing numbers of participants and the anticipated duration of each case may help to accommodate any 'overrun' properly or demonstrate that additional provision may not be necessary.

3.14 I would like to receive the lists of documents, core documents and inquiry documents, as well as the lists of advocates, witnesses and their qualifications, addresses and instructing solicitors where relevant, electronically and in a format compatible with Microsoft Word. I would also wish to have the lists of suggested conditions, all proofs of evidence and summaries, any 'Statement of Common Ground' and the closing submissions to be made available in a similar manner. The easiest way to do this is to send them to the Case Officer as attachments to emails. Or, they can be copied on to suitably formatted discs.

4. *Inquiry procedure and Inquiry timetable*

Arrangements

4.1 The Inquiry will take place in the Council Chamber at Moorlands House, Stockwell Street, Leek, ST13 6HQ, as indicated above. The intention is to provide photocopying facilities and display boards. A room should also be provided for the use of the main parties, the Rule 6 parties and the Inspector. Provision to store documents and plans over the weekend will be necessary. Arrangements should also be made to leave documents and plans in the Inquiry venue on sitting days, if at all possible.

4.2 I normally sit between 10.00 and 17.00hrs with an hour for lunch. There will be 15 minute breaks during the mid-morning and mid-afternoon in which I hope coffee and

tea will be available. On Fridays proceedings will end at about 14.00hrs, though without much of a break for lunch.

Procedure & Timetable

- 4.3 All the main parties and those with Rule 6 status listed in table 1 (above) will have the opportunity to give a short opening outline of their case (no longer than about 15 minutes) at the start of the Inquiry; that will be in the rough order indicated in table 2 (below). There is no requirement to present such an opening statement. However, those who wish to utilise the opportunity should come suitably prepared at the start of the Inquiry. This opportunity is not available to 3rd parties who do not have Rule 6 status.
- 4.4 The evidence will be presented on a case by case basis as indicated in table 2, unless circumstances indicate a more convenient alternative. The timetable in table 2 is provisional and will be adapted to accommodate circumstances. It is in the nature of events like this that changes often have to be accommodated and, if you need to attend on a different day or present your evidence in a different way, I shall try to accommodate you.
- 4.5 Witnesses may read their 'summary proofs' expand appropriate points in presenting their 'evidence in chief', and respond to any cross examination and re-examination. There will be a session before closing submissions to discuss the form of any appropriate conditions and the contents of any section 106 Agreements. The order for closing submissions is set out in the draft timetable (table 2). I would like closing submissions to be supported by written notes and to be made available in some suitable electronic format. However, if that is not possible I can make my own notes of final 'speeches'.

Table 2: Provisional timetable and appearances at the Inquiry

Subject or case	Date and time	Session & Party	No
Opening	Tuesday 7 November 2017 am	Inquiry opening appearances etc opening statements	
COUNCIL	coffee	Appellants	1
		Council	1
RULE 6 PARTIES	pm lunch	Rule 6 parties	5
		Council evidence Ben Haywood	1
		tea	
		Evidence from Rule 6 parties Peter Cowie Cllr Ivan Lucas	2
	Close		
RULE 6 PARTIES cntd	Wednesday 8 November 2017 am	Preliminaries Evidence from Rule 6 parties cntd Churnet Valley Conservation Society David Walters ?	2
	coffee	Paul Housiaux Nick Cresswell Ivan Kent Paul Mew, depending on availability	4
	pm lunch	Ipstones Parish Council Cllr John Williams ?	2
	tea	Kingsley Parish Council John Steele David Fowler ??	4-5
	Close		

Subject or case	Date and time	Session & Party	No
OTHER 3 rd PARTIES	Thursday 9 November 2017 am	Preliminaries Evidence from other 3 rd parties Oakamoor Parish Council Jeff Wood	1?
	coffee		
	pm	Roger Carter	1?
	lunch	Alison Conybeare	1?
	tea		
APPELLANTS	Close	Appellant's evidence Kevin Riley	1
APPELLANTS cntd	Friday 10 November 2017 am	Preliminaries Appellant's evidence cntd John Berry	1
	coffee		
	pm short break		
	Close		
APPELLANTS cntd	Tuesday 14 November 2017 am	Preliminaries Appellant's evidence cntd Rob Smith	1
	coffee		
	pm lunch	Jon Suckley	1
	tea		
	Close		

Subject or case	Date and time	Session & Party	No
DISCUSSION	Wednesday 15 November 2017 am	Preliminaries Conditions Section 106 Agreement	
CLOSING SUBMISSIONS	coffee	Closing submissions Rule 6 parties	5
	pm	Closing submissions ~ Council	1
		Closing submissions ~ Appellants	1
	lunch	CLOSE OF INQUIRY	
SITE VISIT		Site visit	

5. Guidance on some of the potential issues

5.1 In the Statement of Common Ground signed on 25 July 2017 between the Council and the appellants, changes to this appeal proposal are stated to be agreed. The main changes entail:

- A reduction in the height of the hub building to a maximum of 6m rather than the 12m as originally proposed and the removal of the climbing wall;
- A reduction in the area in which the hub buildings may be located by amending the Parameters Plan (now PL1088.M.110 rev 6);
- Additional landscaping proposed within the hub area to further screen the scheme from the Grade II Listed Buildings at Little Eaves Farm and the surrounding footpaths;
- The removal to other parts of the site of the 14 lodges originally proposed to be sited in the woodland at Black Plantation and the notation of Black Plantation as 'retained woodland' on the revised Parameters Plan;
- The formation of a 'no right turn' vehicular access on to Eaves Lane (PB5196-0100 rev C) – ie the access arrangements proposed in the now withdrawn 'access appeal';
- Various further details relating to footpaths, cycleways and bridleways.

5.2 This is essentially the scheme that the Council approved in October 2016 and which is currently subject to a High Court challenge set down for a hearing on 20 July 2017; judgement is currently awaited from the High Court, though the outcome should be known before the start of this Inquiry. If the approval granted by the Council is upheld and all further action is spent, then this appeal is likely to be withdrawn. If further action is not all spent, then this appeal will proceed, but the 'revised scheme' would not be the subject of a refusal by the local planning authority. If the judgement is to quash the planning permission granted by the Council for the 'revised' scheme, then I am faced with a proposal on which no decision has been made by the local planning authority. I have no locus to determine a proposal on which no decision has been made, except in circumstances that do not apply here (ie where there has been a failure to make a decision in the prescribed period and an appeal has been lodged in 'reasonable' time). Nor can I alter a permission that may have been granted by a local planning authority except in specific circumstances, such as a dispute about an imposed planning condition, again a situation that does not apply here.

5.3 In those circumstances it seems to me that the only way that I can consider the proposed revisions to this scheme is as the result of suitable planning conditions imposed on the proposal that is before me. The changes have been widely canvassed and are well understood by local people through the legal challenge to the scheme that has been approved. However, there is still a test that they should not fundamentally alter the nature of the proposal and, since they are part of a separate planning application and have required separate transport and landscape

assessments, there are some grounds for maintaining that they do alter the nature of the proposal. I will thus need to be convinced that such conditions could be legitimately imposed on the scheme before me.

- 5.4 I am afraid that I have some doubts about the traffic generation estimates (the trip rates) used in the Transport Assessment. First, I do not understand how they relate to the feasibility study; this may be explained in some document that I have not yet managed to see. Second, I fail to see how the parking arrangements for staff are going to work. Third, the resulting generation rates seem low in comparison with anything that I currently know about. It would be helpful if a reference could be made and evidence pulled together that might justify these estimates. It would be particularly helpful if comparative evidence can be found to allay my doubts. Such matters should be addressed in the appellant's highways and traffic proof of evidence. Very helpfully it was suggested that a note might be prepared in advance of exchanging the proofs of evidence; that would be most welcome.
- 5.5 Otherwise all parties address a key focus for the Inquiry, namely the relationship between the proposal and the aims, policies and proposals set out in the Core Strategy and the Churnet Valley Masterplan.

DAVID CULLINGFORD

4 August 2017

ANNEX 1: People present at the PIM to receive the Notes

Name	Address
Paul G Tucker QC	ptucker@kingschambers.com
Peter Swallow	pswallow@bolsterstone.com
Marc Bower	marcbower@laver.co.uk
Isla Longmuir	Isla.longmuir@howplanning.com
Emily Williams	emilywilliams@irwinmitchell.com
Cllr John Williams	djohnwilliams@btopenworld.com
Cllr John Steele	johnchristophersteele@btinternet.com
Cllr David Fowler	cdfowler@gmail.com
David Walters	thewalters210@btinternet.com
Peter Cowie	vivpetecowie@btinternet.com
Paul Housiaux	Franciscasswell@btinternet.com
Ben Haywood	ben.haywood@staffsmoorlands.gov.uk
Hugh Richards	hr@no5.com

ANNEX 2 : Core Documents, February 2016

Folder		Document
CD		
Folder 1	CD1	Completed Application Forms and Certificate
	CD2	Red Line Plan (drawing ref. PL1088.M.106 Rev 2)
	CD3	Overall Illustrative Masterplan (drawing ref. PL1088.M.100 Rev 2)
	CD4	Illustrative Detail Plan; The Hub (ref. PL1088.M.101 Rev 2)
	CD5	Illustrative Detail Plan; The Upper Lake (ref. PL1088.M.102 Rev 2)
	CD6	Illustrative Detail Plan; The Lake (ref. PL1088.M.103 Rev 2)
	CD7	Illustrative Site Sections (drawing ref. PL1088.M.107 Rev 2)
	CD8	Parameters Plan (drawing ref. PL1088.M.110 Rev 2)
	CD9	Indicative Existing and Proposed Footpath Plan (drawing ref. PL1088.M.003 Rev 2)
	CD10	Character Areas Plan (drawing ref. PL1088.M.113 Rev 1)
	CD11	Plan 1: Existing Eaves Lane Access Plan (drawing ref. PB1608/SK005 Rev A)
	CD12	Plan 2: Proposed Blakeley Lane Access Plan (drawing ref. PB1608/SK004 Rev B)
	CD13	Supporting Planning Statement prepared by HOW Planning (October 2014)
Folder 2	CD14	Environmental Statement: Non-Technical Summary (Volume 1) prepared by HOW Planning (October 2014)
	CD15	Environmental Statement: Main Text (Volume 2) prepared by HOW Planning (October 2014)
Folder 3	CD16	Environmental Statement: Appendices (Volume 3) prepared by HOW Planning (October 2014)
Folder 4	CD16	Continued
Folder 5	CD16	Continued
Folder 6	CD17	Statement of Community Involvement prepared by HOW Planning (October 2014)
	CD18	Design and Access Statement prepared by Planit-ie (October 2014)
	CD19	Feasibility Study by Christie and Co. (March 2014)
	CD20	Sustainability Statement prepared by WSP (October 2014)
	CD21	Energy Strategy prepared by WSP (October 2014)

Folder	Document
	CD
CD22	Schedule of Revised Application Drawings (June 2015) prepared by HOW Planning
CD23	Red Line Plan (Drawing ref. PL1088.M106 Rev 3) prepared by Planit
CD24	Overall Illustrative Masterplan (Drawing ref. PL1088.M100 Rev 3) prepared by Planit
CD25	Illustrative Detail Plan; The Upper Lake (Drawing ref. PL1088.M.102 rev 3) prepared by Planit
CD26	Illustrative Detail Plan; The Lake (Drawing ref. PL1088.M.103 Rev 3) prepared by Planit
CD27	Illustrative Site Sections (Drawing ref. PL1088.M.107 Rev 3) prepared by Planit
CD28	Parameters Plan (Drawing ref. PL1088.M110 Rev 3) prepared by Planit
CD29	Character Areas Plan (Drawing ref. PL1088.M113 Rev 2) prepared by Planit
CD30	Proposed Footpath Plan Connections (Drawing ref. PL1088.M004 Rev 00) prepared by Planit
CD31	Proposed Blakeley Lane Access Plan (Drawing ref. PB1608-SK004 Rev E) prepared by Royal Haskoning DHV
CD32	Consultation Response Statement (May 2015) prepared by HOW Planning
CD33	Environmental Statement Addendum (May 2015) prepared by HOW Planning
CD34	HOW Planning Letter dated 17th August 2015 to Staffordshire Moorlands District Council (Response to Mr. Walters)
CD35	Environmental Statement Addendum (October 2015) prepared by HOW Planning
CD36	Drawing PB1608/SK001 Revision B; Proposed Layout of A52 and Whiston Eaves Lane Junction
CD37	Drawing PL1088.M101 Rev 2 - Illustrative Detail Plan - The Hub
CD38	Updated Schedule of Development
CD39	Drawing PL1088.M004 - Proposed Footpath Connection Plan
CD40	Note on Ecological Effects of the proposed Blackley Lane access to Black Plantation by Bowland Ecology

Folder	Document
	CD
	CD41 Further Ecological Information: Outline Construction management Plan (CEcMP) According to BS 42020:2013 by Bowland-Ecology
	CD42 Further Ecological Information: Outline Management Plan by Bowland Ecology
	CD43 HOW Planning email; Moneystone Park (Visit Peak District Letter of Support) dated 20th October 2015
	CD44 HOW Planning email; Moneystone Park (Alternative Transport Assessment Response) dated 12th November 2015
	CD45 Royal Haskoning DHV email; Moneystone Park - Paul Mew Associates Response dated 13th November 2015
	CD46 HOW Planning email; Moneystone Parameters email dated 16th November 2015
	CD47 HOW Planning email; Moneystone dated 16th November 2015
	CD48 HOW Planning email; Moneystone Park (Planning Committee Members Letter) dated 23 rd November 2015
	CD49 HOW Planning email; Moneystone Quarry (Adventure Play Area and High Ropes Course) dated 24th November 201
	CD50 HOW Planning email; Moneystone Quarry (Laver Leisure Supplementary Response and Conditions), 24th November 2015
	CD51 HOW Planning email; Moneystone Park (Bridleway), 24th November 2015
	CD52 HOW Planning email; Moneystone dated 16th November 2015
	CD53 HOW Planning email; FW: Moneystone dated 12th November 2015
	CD54 HOW Planning email; RE: Moneystone dated 12th November 2015

Appendix F
Warren Wood Centre Parcs Application Extract



Appendix 7.1

Center Parcs, Warren Wood - Transportation
Assessment - Ref. C-204073, Hannah Reed and
Associates



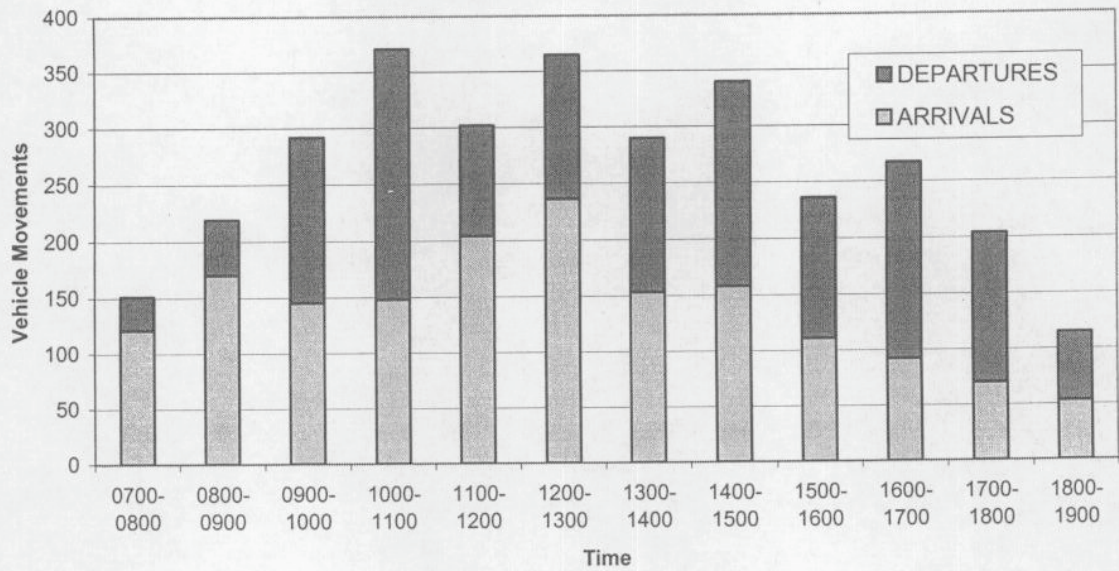
APPENDIX H

Elveden Traffic data

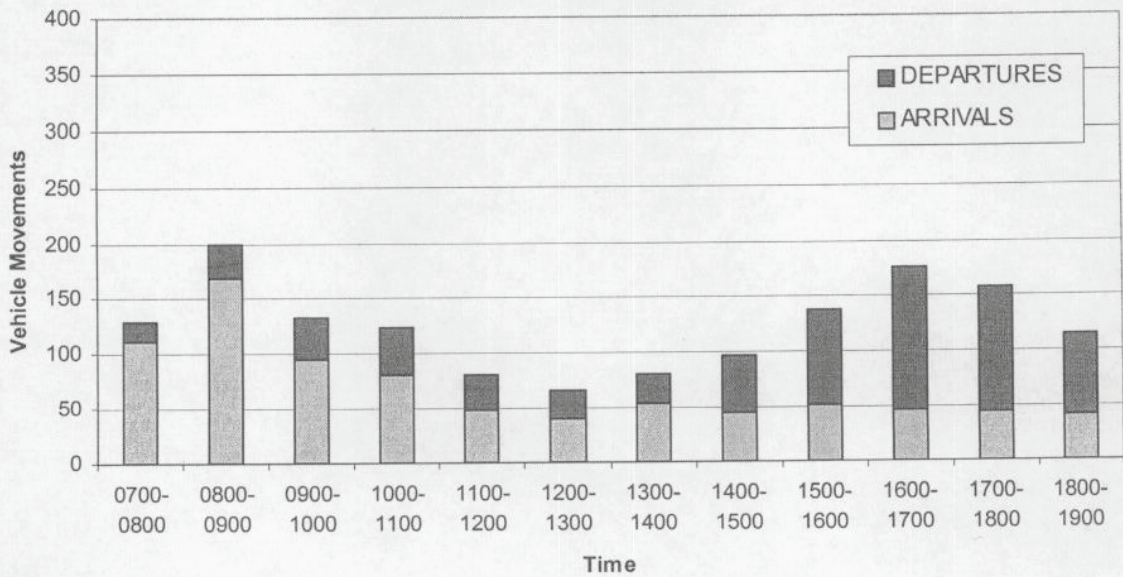
Changeover/non Changeover days

August 2004

Center Parcs Elveden
Changeover Day Veh. Movts (13/08/04)



Center Parcs Elveden
Non-changeover Day Veh. Movts (11/08/04)



Data for Changeover Day (13/08/04)

ARRIVALS

Data Hourly	Walk	Ped Cycle	Total 1 and 2	Motor cycle	Single Occ car	Doub occup	Trip. occup	4+ occup	Light Goods	HGV	Bus	Total 3 to 9
0700-0800	0	0	0	3	77	18	2	0	17	4	0	121
0800-0900	1	1	2	0	123	27	8	1	10	0	1	170
0900-1000	0	1	1	1	64	45	12	3	9	0	11	145
1000-1100	0	1	1	0	36	32	20	44	14	1	1	148
1100-1200	0	4	4	0	20	43	31	96	10	3	1	204
1200-1300	0	1	1	2	24	61	42	99	8	0	0	236
1300-1400	1	1	2	2	31	38	21	56	2	1	2	153
1400-1500	0	3	3	2	30	45	33	34	6	1	7	158
1500-1600	0	0	0	2	24	19	22	39	5	0	0	111
1600-1700	0	0	0	0	26	31	12	19	4	0	0	92
1700-1800	0	0	0	2	30	9	11	16	0	0	2	70
1800-1900	0	0	0	8	20	10	4	9	2	0	0	53
1900-2000	0	0	0	0	7	9	2	2	2	0	0	22
2000-2100	0	0	0	0	9	8	2	1	0	0	0	20
2100-2200	0	0	0	0	4	6	2	0	1	0	0	13
	2	12	14	22	525	401	224	419	90	10	25	1716

1661

55

A total of 3822 people entered the site during the period 0700-2200.

DEPARTURES

Data Hourly	Walk	Ped Cycle	Total 1 and 2	Motor cycle	Single Occ car	Doub occup	Trip. occup	4+ occup	Light Goods	HGV	Bus	Total 3 to 9
0700-0800	0	0	0	0	11	6	2	1	7	1	2	30
0800-0900	0	0	0	0	20	7	2	10	7	3	0	49
0900-1000	0	5	5	0	18	36	19	66	5	1	2	147
1000-1100	0	0	0	0	31	56	26	91	16	1	2	223
1100-1200	0	0	0	0	9	17	19	44	6	2	1	98
1200-1300	0	0	0	0	26	29	16	46	8	1	3	129
1300-1400	0	0	0	0	23	34	20	54	5	1	0	137
1400-1500	0	1	1	1	71	40	18	38	8	2	4	182
1500-1600	0	0	0	1	44	26*	15	33	6	0	0	125
1600-1700	0	0	0	2	105	28	10	22	7	0	1	175
1700-1800	1	1	2	0	73	23	12	21	5	0	0	134
1800-1900	0	0	0	1	32	15	1	10	3	0	0	62
1900-2000	0	0	0	1	25	6	1	11	0	0	0	44
2000-2100	0	0	0	0	9	12	1	4	0	0	0	26
2100-2200	0	3	3	0	26	19	2	5	0	0	0	55
	1	10	11	6	523	354	164	456	83	12	15	1616

1491

125

A total of 3663 people left the site during the period 0700-2200.

IN+OUT COMBINED

Data Hourly	Walk	Ped Cycle	Total 1 and 2	Motor cycle	Single Occ car	Doub occup	Trip. occup	4+ occup	Light Goods	HGV	Bus	Total 3 to 9
0700-0800	0	0	0	3	88	24	4	1	24	5	2	151
0800-0900	1	1	2	0	143	34	10	11	17	3	1	219
0900-1000	0	6	6	1	82	81	31	69	14	1	13	292
1000-1100	0	1	1	0	67	88	46	135	30	2	3	371
1100-1200	0	4	4	0	29	60	50	140	16	5	2	302
1200-1300	0	1	1	2	50	90	58	145	16	1	3	365
1300-1400	1	1	2	2	54	72	41	110	7	2	2	290
1400-1500	0	4	4	3	101	85	51	72	14	3	11	340
1500-1600	0	0	0	3	68	45	37	72	11	0	0	236
1600-1700	0	0	0	2	131	59	22	41	11	0	1	267
1700-1800	1	1	2	2	103	32	23	37	5	0	2	204
1800-1900	0	0	0	9	52	25	5	19	5	0	0	115
1900-2000	0	0	0	1	32	15	3	13	2	0	0	66
2000-2100	0	0	0	0	18	20	3	5	0	0	0	46
2100-2200	0	3	3	0	30	25	4	5	1	0	0	68
	3	22	25	28	1048	755	388	875	173	22	40	3332

3152

180

Data for Non-changeover Day (11/08/04)

ARRIVALS

Data Hourly	Walk	Ped Cycle	Total 1 and 2	Motor cycle	Single Occ car	Doub occup	Trip. occup	4+ occup	Light Goods	HGV	Bus	Total 3 to 9
0700-0800	0	6	6	1	73	16	3	3	11	4	0	111
0800-0900	0	2	2	1	123	31	2	2	8	0	2	169
0900-1000	0	0	0	0	57	16	7	7	5	0	3	95
1000-1100	0	1	1	0	31	17	12	9	5	3	4	81
1100-1200	0	1	1	0	18	14	5	4	4	2	1	48
1200-1300	1	10	11	2	20	3	1	3	6	3	2	40
1300-1400	1	1	2	1	27	11	6	2	3	2	1	53
1400-1500	0	3	3	2	17	12	5	0	5	0	3	44
1500-1600	0	1	1	1	24	19	2	2	2	0	2	52
1600-1700	1	4	5	0	30	8	0	3	2	0	4	47
1700-1800	0	0	0	0	28	7	5	3	2	0	0	45
1800-1900	0	0	0	0	18	14	3	3	2	0	2	42
1900-2000	0	4	4	0	13	2	2	2	0	0	0	19
2000-2100	0	0	0	0	7	3	1	0	0	0	0	11
2100-2200	0	0	0	0	2	1	0	1	1	0	0	5
	3	33	36	8	488	174	54	44	56	14	24	862

827

35

A total of 1267 people entered the site during the period 0700-2200.

DEPARTURES

Data Hourly	Walk	Ped Cycle	Total 1 and 2	Motor cycle	Single Occ car	Doub occup	Trip. occup	4+ occup	Light Goods	HGV	Bus	Total 3 to 9
0700-0800	0	0	0	0	7	2	0	0	5	3	2	19
0800-0900	0	0	0	0	23	2	0	0	3	2	0	30
0900-1000	0	1	1	0	17	9	1	4	4	0	3	38
1000-1100	1	9	10	0	17	10	3	5	2	3	3	43
1100-1200	0	2	2	0	10	10	3	3	3	3	0	32
1200-1300	0	2	2	0	11	2	1	1	6	3	2	26
1300-1400	1	0	1	0	15	2	2	0	4	2	2	27
1400-1500	0	0	0	6	32	4	1	2	3	1	3	52
1500-1600	0	0	0	2	58	15	1	2	5	0	3	86
1600-1700	0	8	8	0	88	24	1	5	6	0	4	128
1700-1800	0	0	0	1	82	18	1	4	5	1	0	112
1800-1900	0	1	0	0	38	13	6	11	3	0	2	73
1900-2000	0	2	2	0	33	8	0	3	0	0	0	44
2000-2100	0	0	0	0	11	6	2	2	1	0	0	22
2100-2200	0	0	0	1	24	11	1	0	0	0	0	37
	2	25	26	10	466	136	23	42	50	18	24	769

666

103

A total of 1077 people left the site during the period 0700-2200.

IN + OUT COMBINED

Data Hourly	Walk	Ped Cycle	Total 1 and 2	Motor cycle	Single Occ car	Doub occup	Trip. occup	4+ occup	Light Goods	HGV	Bus	Total 3 to 9
0700-0800	0	6	6	1	80	18	3	3	16	7	2	130
0800-0900	0	2	2	1	146	33	2	2	11	2	2	199
0900-1000	0	1	1	0	74	25	8	11	9	0	6	133
1000-1100	1	10	11	0	48	27	15	14	7	6	7	124
1100-1200	0	3	3	0	28	24	8	7	7	5	1	80
1200-1300	1	12	13	2	31	5	2	4	12	6	4	66
1300-1400	2	1	3	1	42	13	8	2	7	4	3	80
1400-1500	0	3	3	8	49	16	6	2	8	1	6	96
1500-1600	0	1	1	3	82	34	3	4	7	0	5	138
1600-1700	1	12	13	0	118	32	1	8	8	0	8	175
1700-1800	0	0	0	1	110	25	6	7	7	1	0	157
1800-1900	0	1	0	0	56	27	9	14	5	0	4	115
1900-2000	0	6	6	0	46	10	2	5	0	0	0	63
2000-2100	0	0	0	0	18	9	3	2	1	0	0	33
2100-2200	0	0	0	1	26	12	1	1	1	0	0	42
	5	58	62	18	954	310	77	86	106	32	48	1631

1493

138

Appendix G

E-mail from Jim Long of Staffordshire County Council Highways to Mark Lynch
(Planning Officer) at Staffordshire Moorlands District Council - 10/02/15

Lynch, Mark

From: Long, Jim (Place) [jim.long@staffordshire.gov.uk]
Sent: 10 February 2015 14:49
To: Lynch, Mark
Subject: RE: CCE09012015.pdf The Paul Mew traffic report

Follow Up Flag: Follow up
Flag Status: Flagged

Mark

Yes I have seen the report before, a response to Mr Housiaux from our Chief Ex mentioned the report (dated 22nd January). Since my arrival (27th January) I have given Dale some additional information in order that he can give an additional response.

Part of my draft response, you may have seen before, may include ;

The Transport Assessment does acknowledge that, in comparison terms, there may be a significant percentage increase in traffic during the peak hour periods on Whiston Eaves Lane, associated with the proposed development. It should be noted however that the A52 and Whiston Eaves Lane are quiet traffic roads. The Transport Assessment suggests that the surveyed traffic flows on the A52, immediately west of the junction with Whiston Eaves Lane, has a two-way traffic flow of 118 during the weekday morning peak hour and 108 during the weekday evening peak hour. The two-way traffic flows on Whiston Eaves Lane is 29 during the weekday morning peak hour and 56 during the weekday evening peak hour. Any increase in traffic on these roads, in percentage terms, could be considered significant, although the combined existing traffic and development traffic combined is still low.

No accidents have occurred during a 5 year period, between 1 April 2009 and 31 March 2014 at this location and during part of this period, the site was still operating as a quarry when slow moving HGVs were entering and exiting the junction and was subject to a 40mph speed limit.

As part of the application, the preferred option proposed is to introduce a ghost island right turn on the A52, but it is also proposed that a Traffic regulation Order (TRO) could be implemented by the Highway Authority, funded by the developer, to introduce a 30mph speed limit on the A52 in the vicinity of the Whiston Eaves Lane junction. It is proposed that the right turn improvement would therefore also be accompanied with the introduction of a 30mph speed limit. The reduction of the speed limit to a 30mph should provide a significant improvement compared with the existing situation. A Designer's Response has been submitted to address the issues raised in the Safety Audit for the ghost island right turn option, which concluded that there were no fundamental flaws with the proposed layout of the junction.

Although the above may be our response, my thoughts, since I have taken over this application, which should not be used at this stage, are;

Although the proposed junction layout struggles to meet the standards set out in DMRB, the proposals do represent an improvement to an existing junction especially if the introduction of a 30mph speed limit. We need to, however, ensure that the 30 mph speed limit is complied with.

Appendix H
A52 Speed Survey Data – September 2017

A52 / Whiston Eaves Lane
Speed Survey carried out by Paul Mew Associates

Date: 28/09/2017
 Period: 11:00-13:30
 Traffic Conditions: Free flow throughout
 Weather Conditions: Dry / Sunny Spells
 85th percentile speeds: Rank Order 170 of 200 (shaded cells)

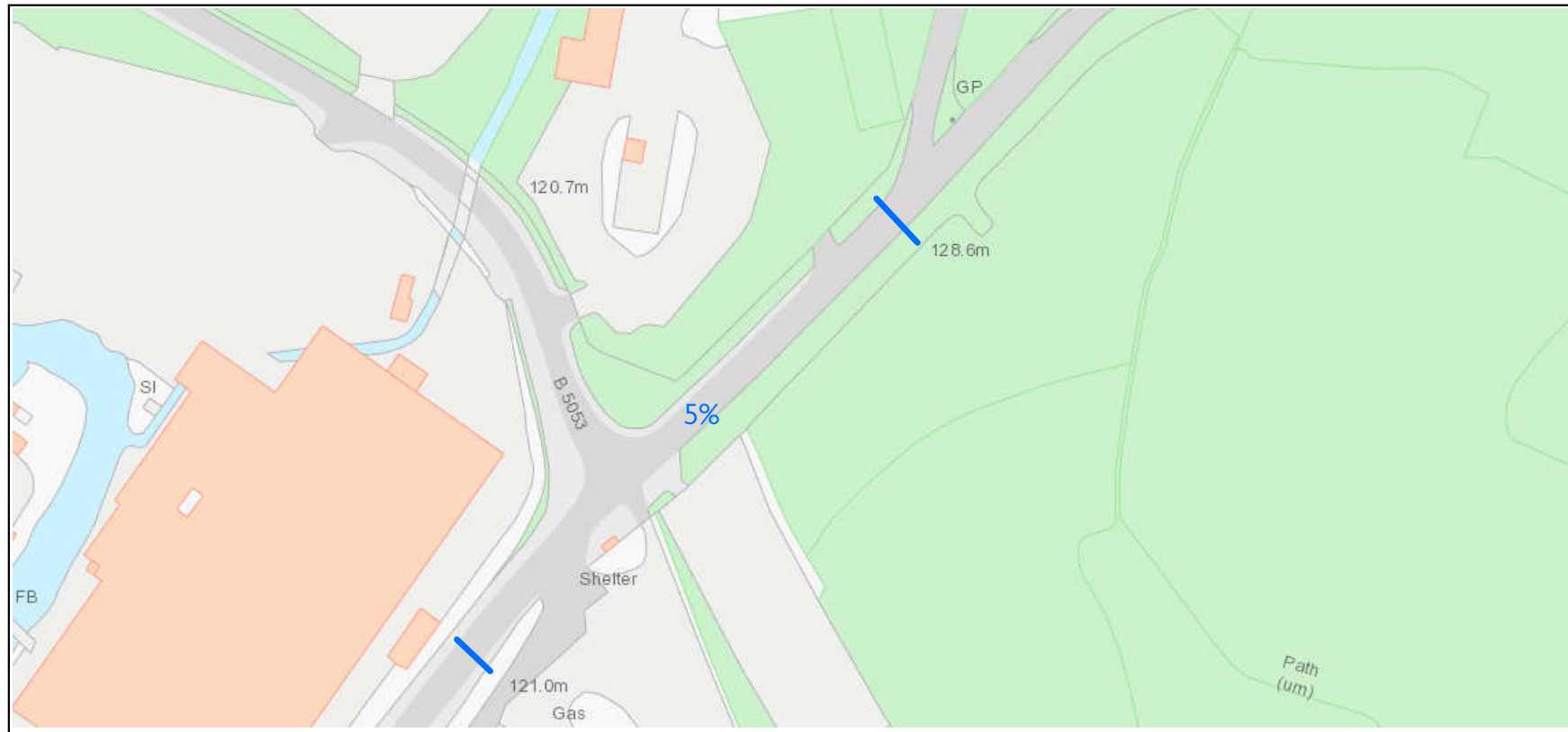
Rank Order.	Vehicle Speed (mph)	
	From East	From West
1	21	20
2	22	20
3	24	20
4	24	20
5	24	21
6	24	23
7	26	23
8	27	23
9	27	23
10	28	23
11	28	24
12	28	24
13	28	24
14	28	25
15	28	25
16	28	25
17	28	25
18	28	25
19	30	26
20	30	26
21	30	26
22	30	26
23	30	26
24	30	27
25	30	27
26	30	27
27	30	27
28	30	27
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34	31	28
35	31	28
36	31	28
37	31	28
38	32	28
39	32	28
40	32	28
41	32	28
42	32	28
43	32	28
44	32	28
45	32	28
46	32	28
47	32	29
48	32	29
49	32	29
50	32	29

Rank Order.	Vehicle Speed (mph)	
	From East	From West
51	32	29
52	32	29
53	32	29
54	33	29
55	33	30
56	33	30
57	33	30
58	33	30
59	33	30
60	33	30
61	33	30
62	33	30
63	33	30
64	33	31
65	33	31
66	33	31
67	33	31
68	33	31
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84	34	32
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86	34	32
87	35	32
88	35	32
89	35	32
90	35	32
91	35	32
92	35	32
93	35	32
94	35	32
95	35	32
96	35	32
97	35	32
98	36	32
99	36	32
100	36	32

Rank Order.	Vehicle Speed (mph)	
	From East	From West
101	36	32
102	36	32
103	36	32
104	36	32
105	36	32
106	36	32
107	36	32
108	36	32
109	36	32
110	36	32
111	37	32
112	37	33
113	37	33
114	37	33
115	37	33
116	37	33
117	37	33
118	37	33
119	37	33
120	37	33
121	37	33
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124	38	33
125	38	33
126	38	33
127	38	33
128	38	33
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132	38	33
133	38	33
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136	39	33
137	39	33
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139	39	34
140	39	34
141	39	34
142	39	34
143	39	34
144	39	34
145	39	34
146	40	34
147	40	34
148	40	34
149	40	34
150	40	34

Rank Order.	Vehicle Speed (mph)	
	From East	From West
151	40	34
152	40	34
153	41	34
154	41	34
155	41	34
156	41	35
157	41	35
158	41	35
159	41	35
160	41	35
161	41	35
162	41	36
163	41	36
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175	42	36
176	42	37
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178	42	37
179	43	37
180	43	37
181	43	38
182	43	38
183	43	38
184	43	38
185	43	38
186	43	38
187	43	39
188	44	39
189	44	39
190	44	39
191	44	39
192	44	40
193	44	40
194	45	40
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196	46	41
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198	47	42
199	48	51
200	48	52

Appendix I
A52 Road Gradient Assessment



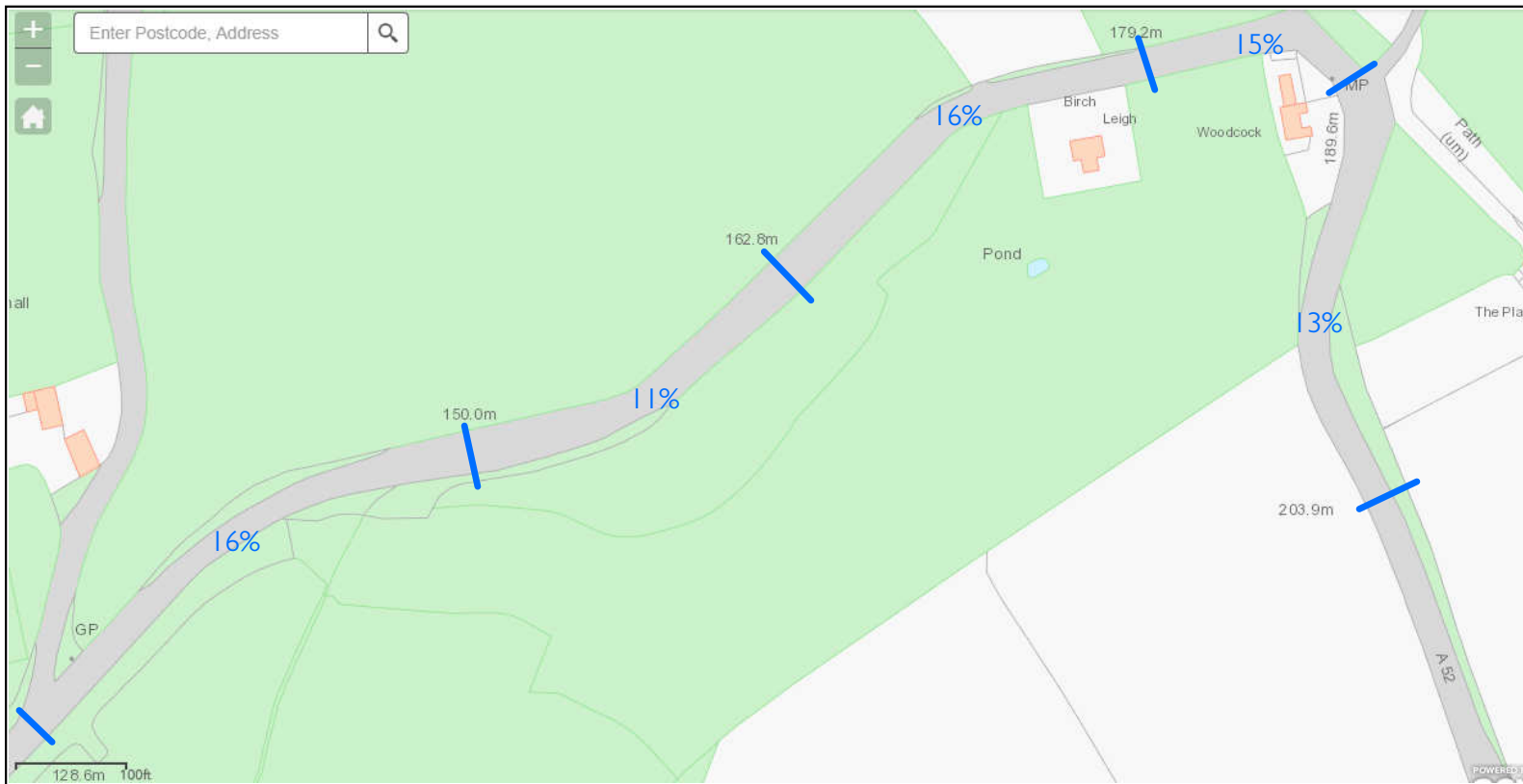
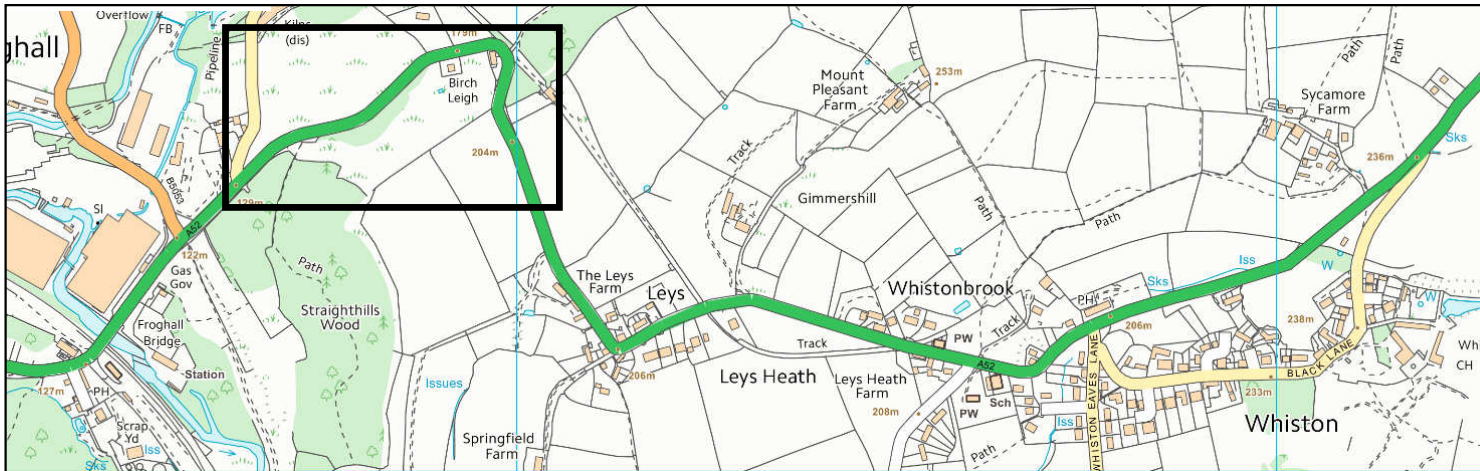
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 Source: SCC / Google



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section I


 PAUL MEW ASSOCIATES
 TRAFFIC CONSULTANTS

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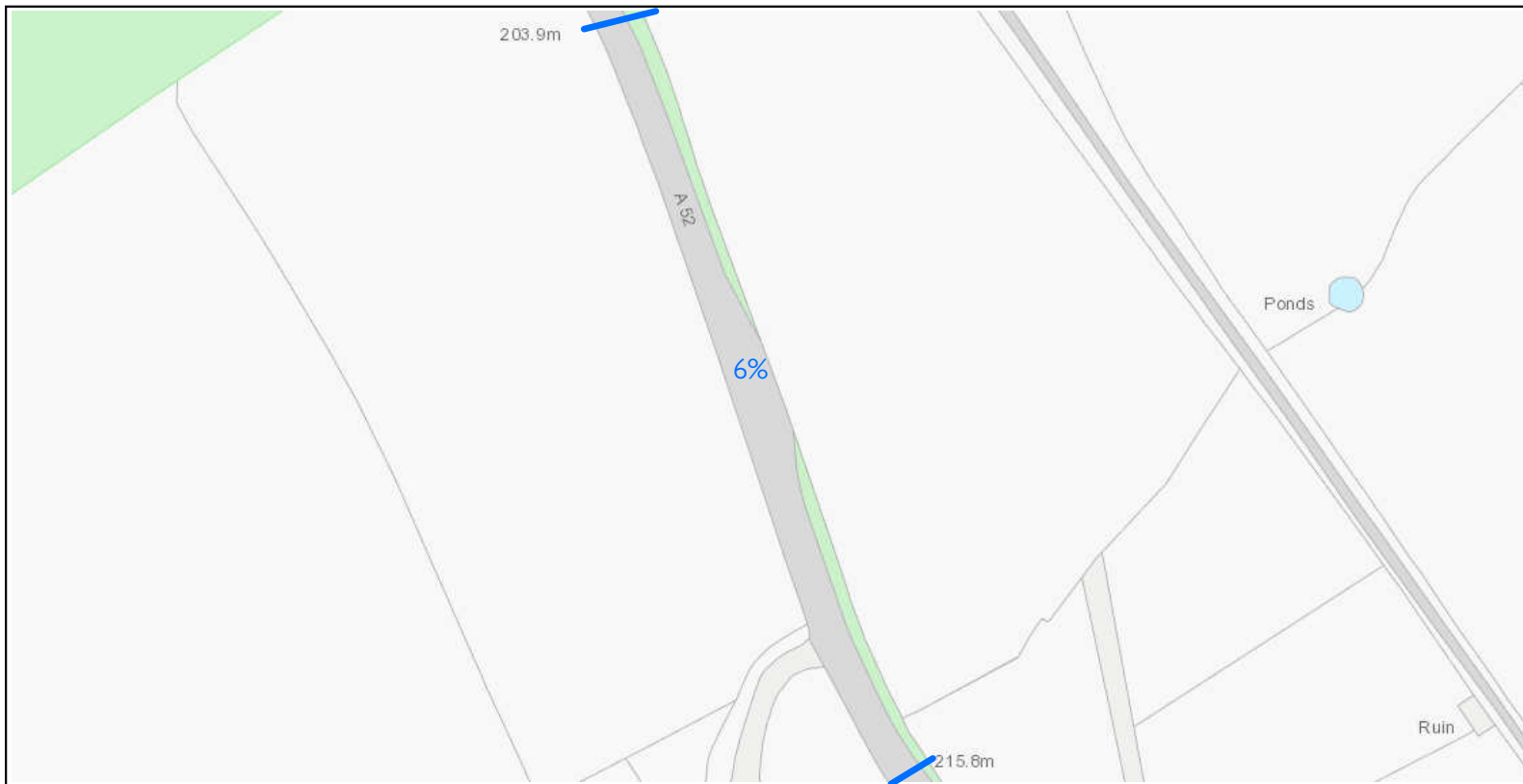
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Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 2


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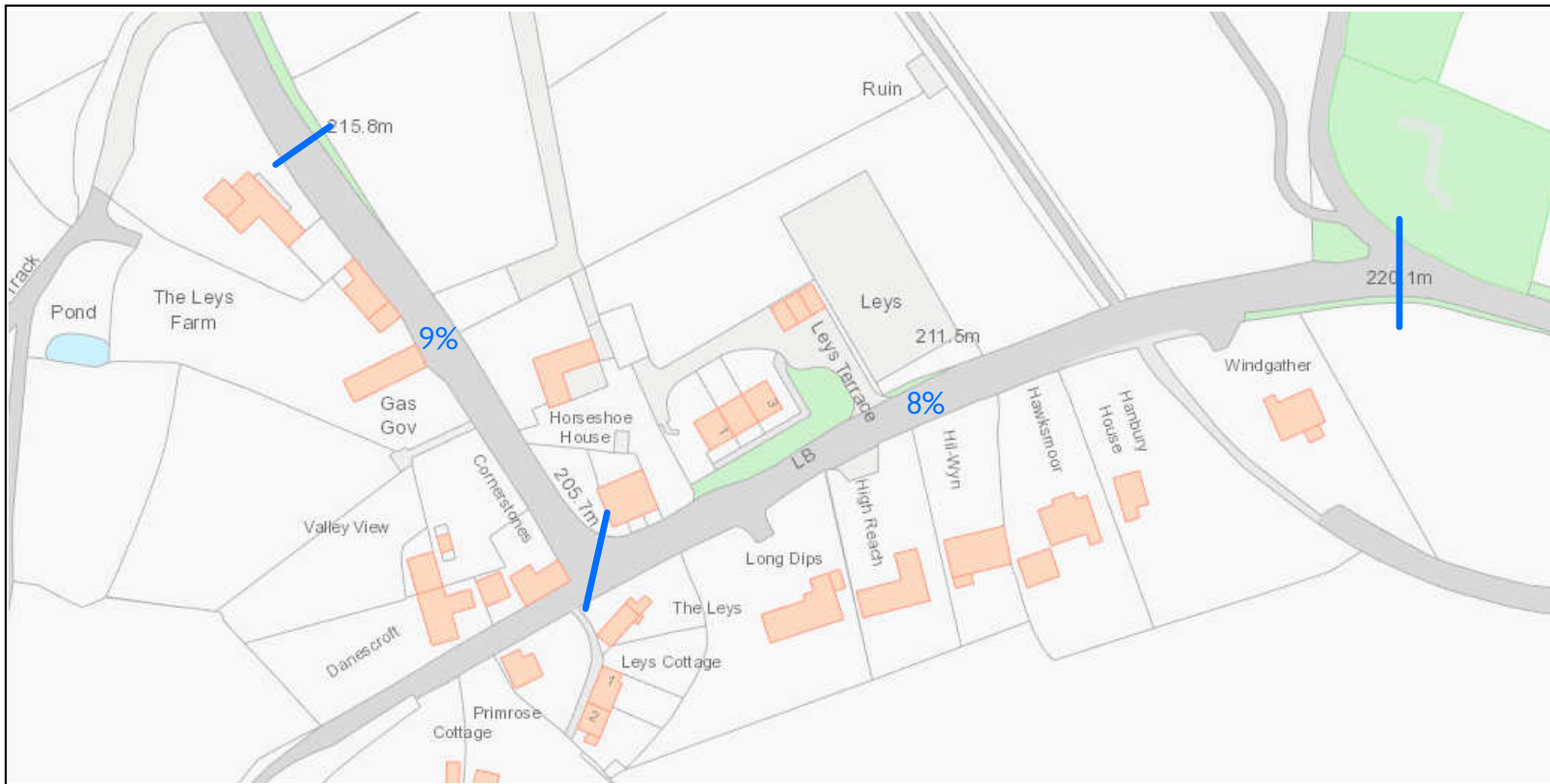
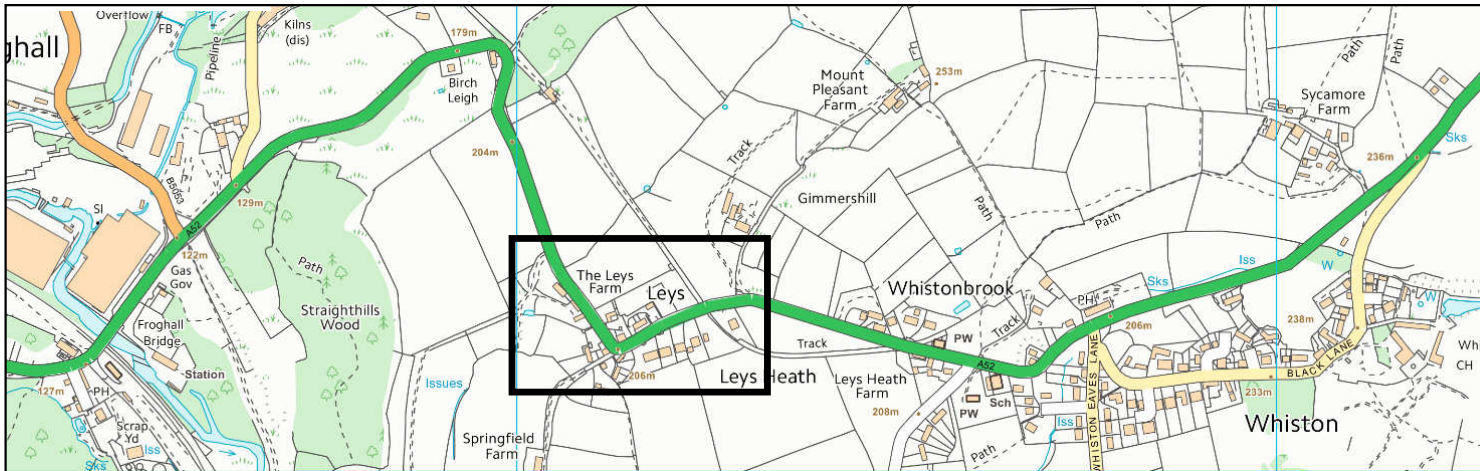


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 Source: SCC / Google



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 3


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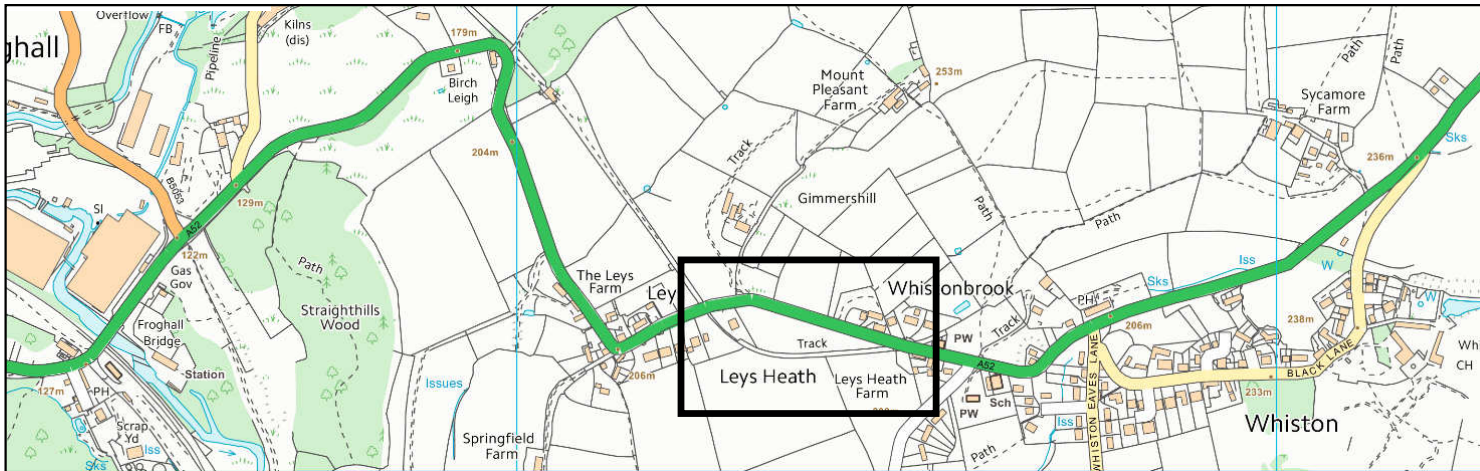
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 Source: SCC / Google



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 4


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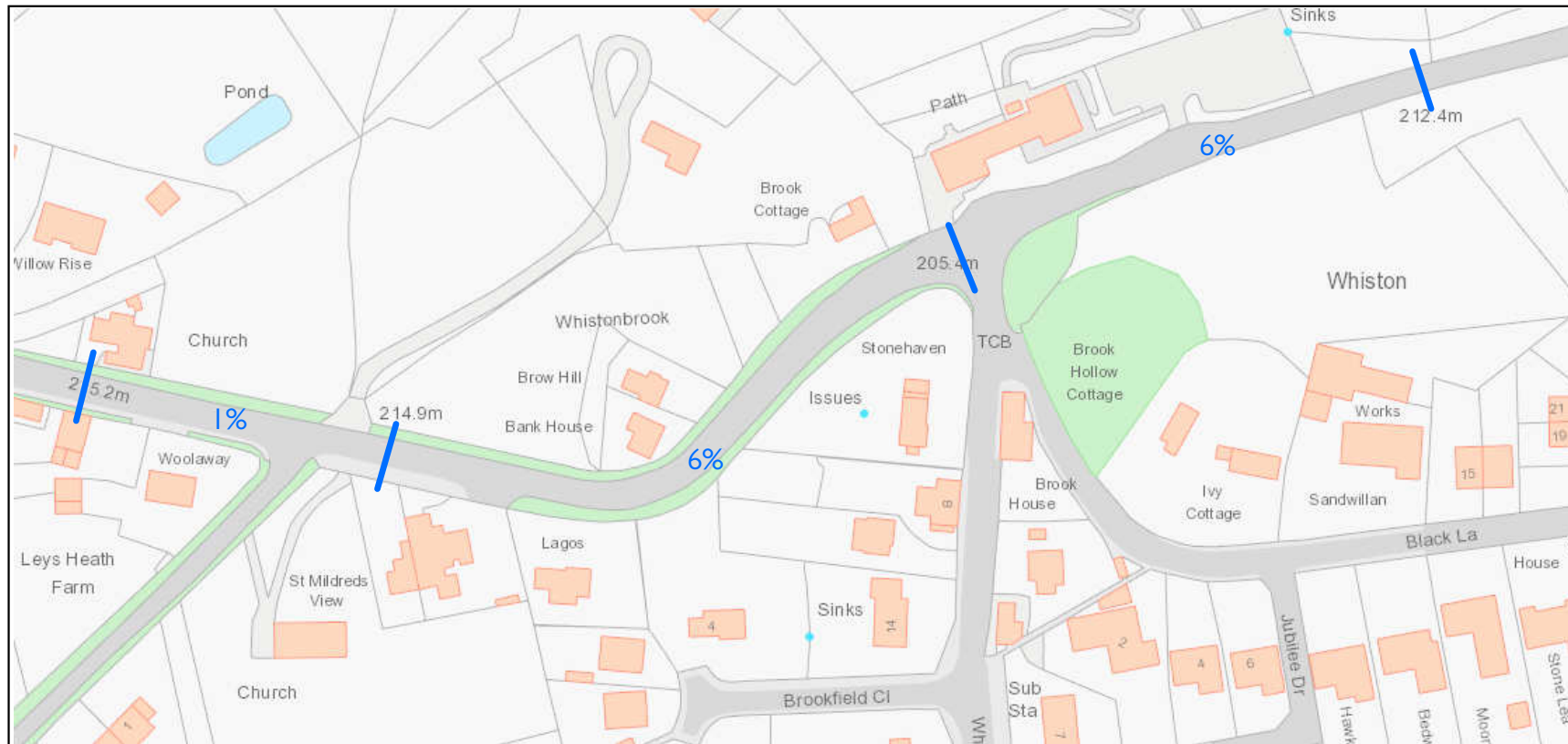
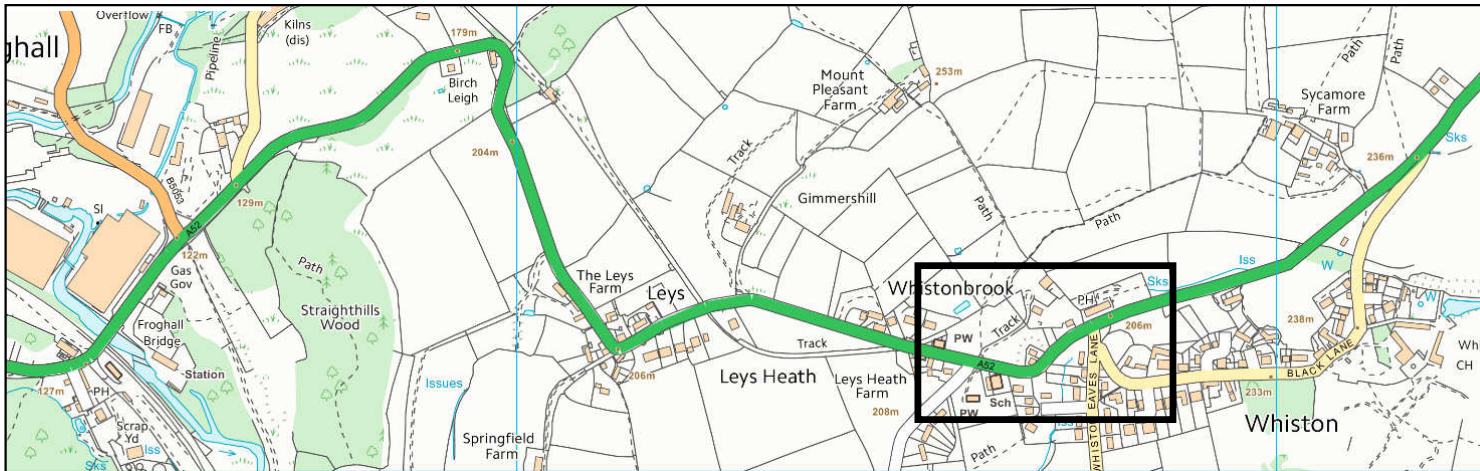
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 Source: SCC / Google



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 5


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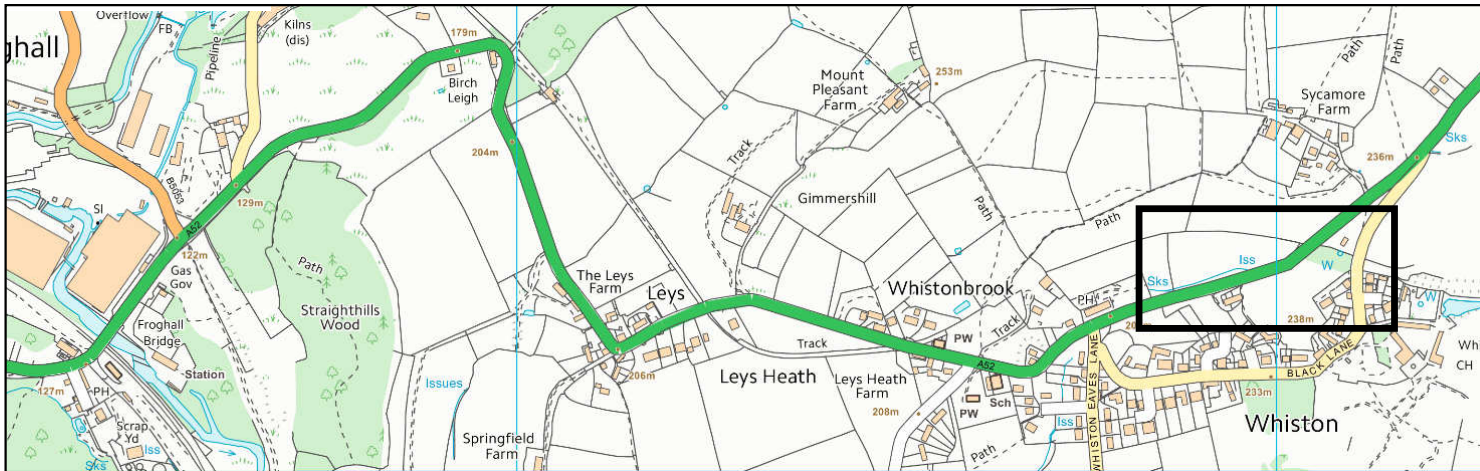
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Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 6


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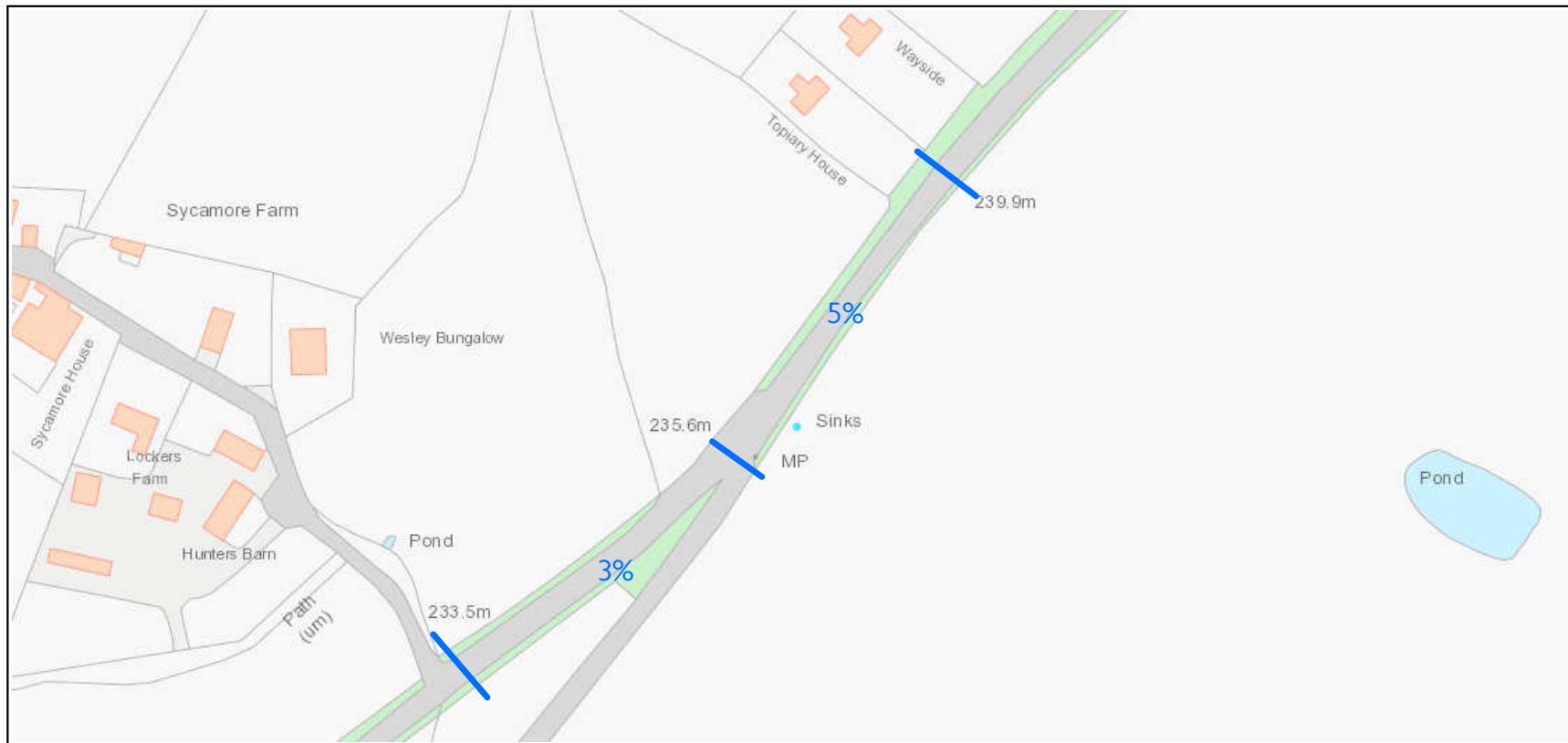
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 Source: SCC / Google



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 7


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Date: 27/09/17
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 Source: SCC / Google

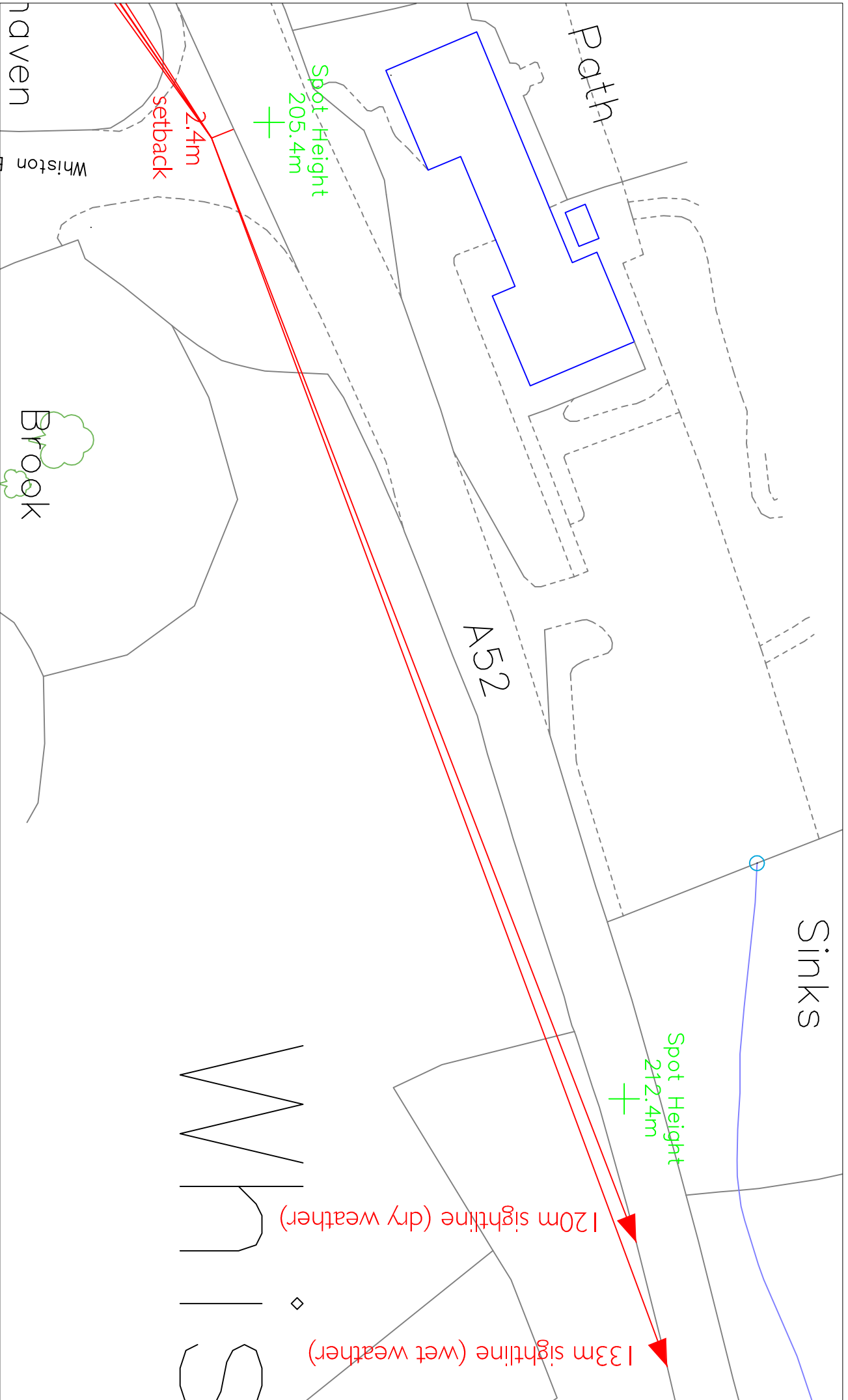


Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 Gradient Assessment - Section 8


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Appendix J
A52 / Whiston Eaves Lane Sightline Assessments



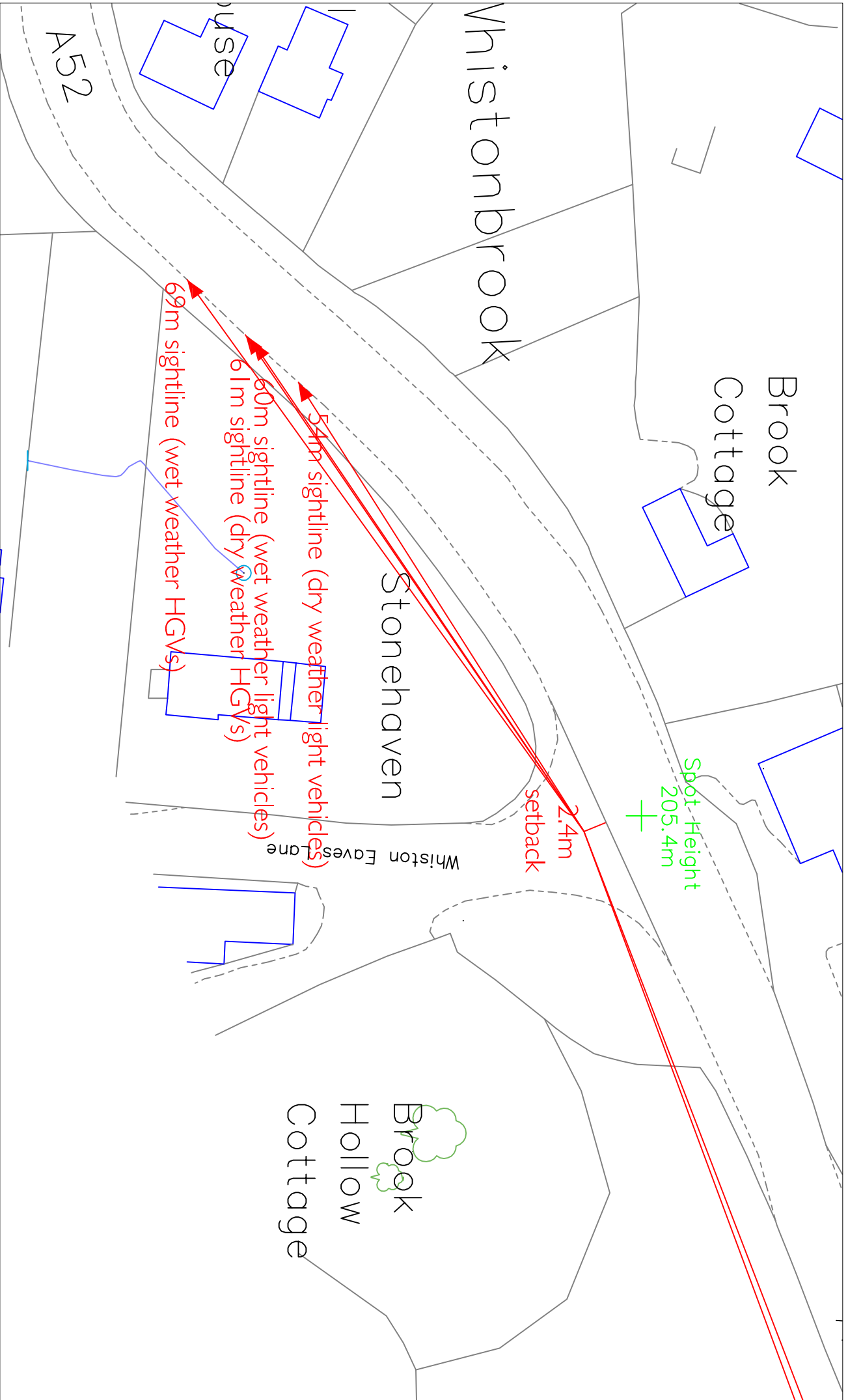
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 Source: Ordnance Survey



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 / Whiston Eaves Lane Existing Junction (40mph Speed Limit)
 Sightline Assessment to East



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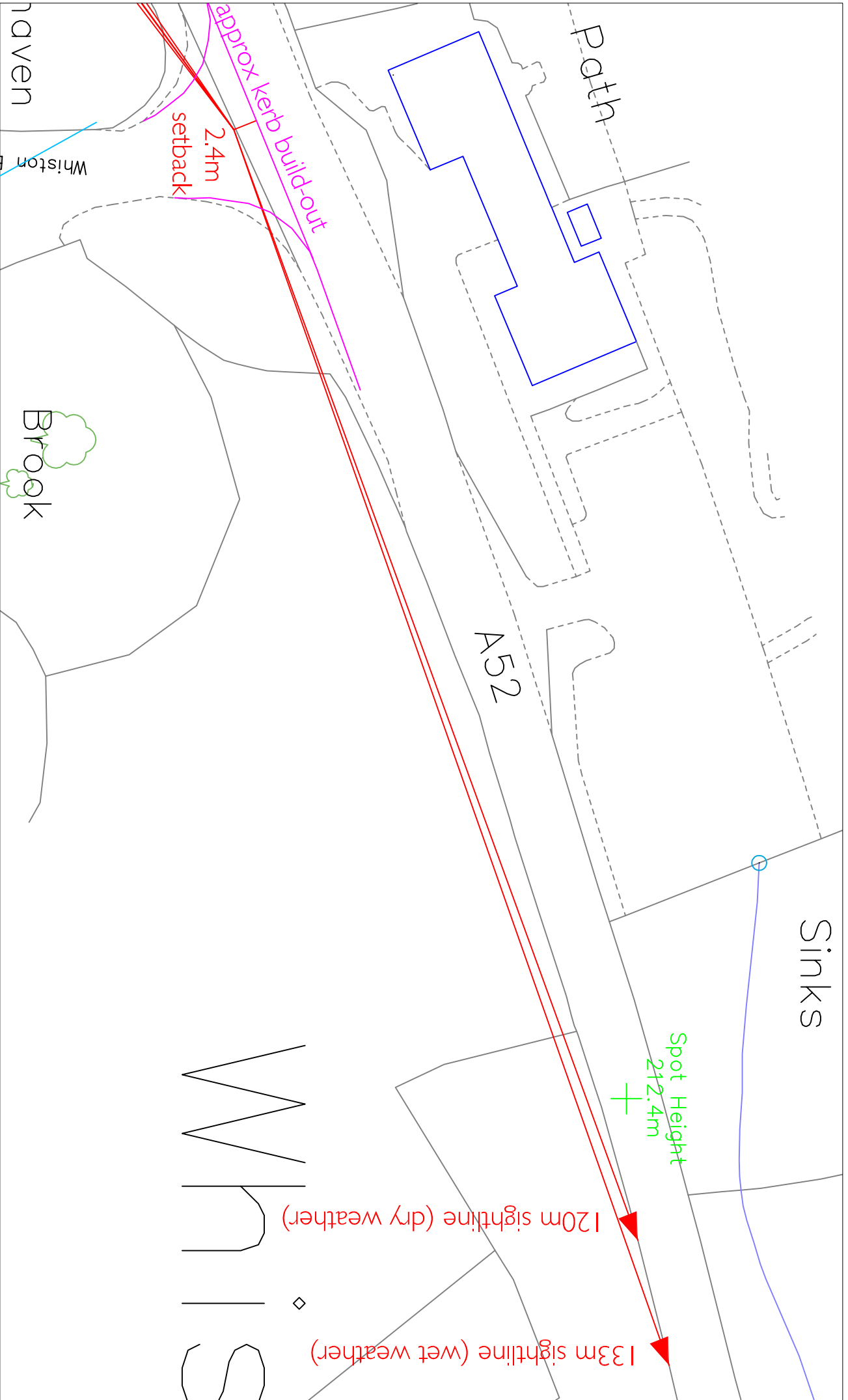
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 Source: Ordnance Survey



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 / Whiston Eaves Lane Existing Junction (40mph Speed Limit)
 Sightline Assessment to West



PAUL MEW ASSOCIATES
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 Email: paul.mew@pma-traffic.co.uk Website: www.pma-traffic.co.uk



Date: 27/09/17
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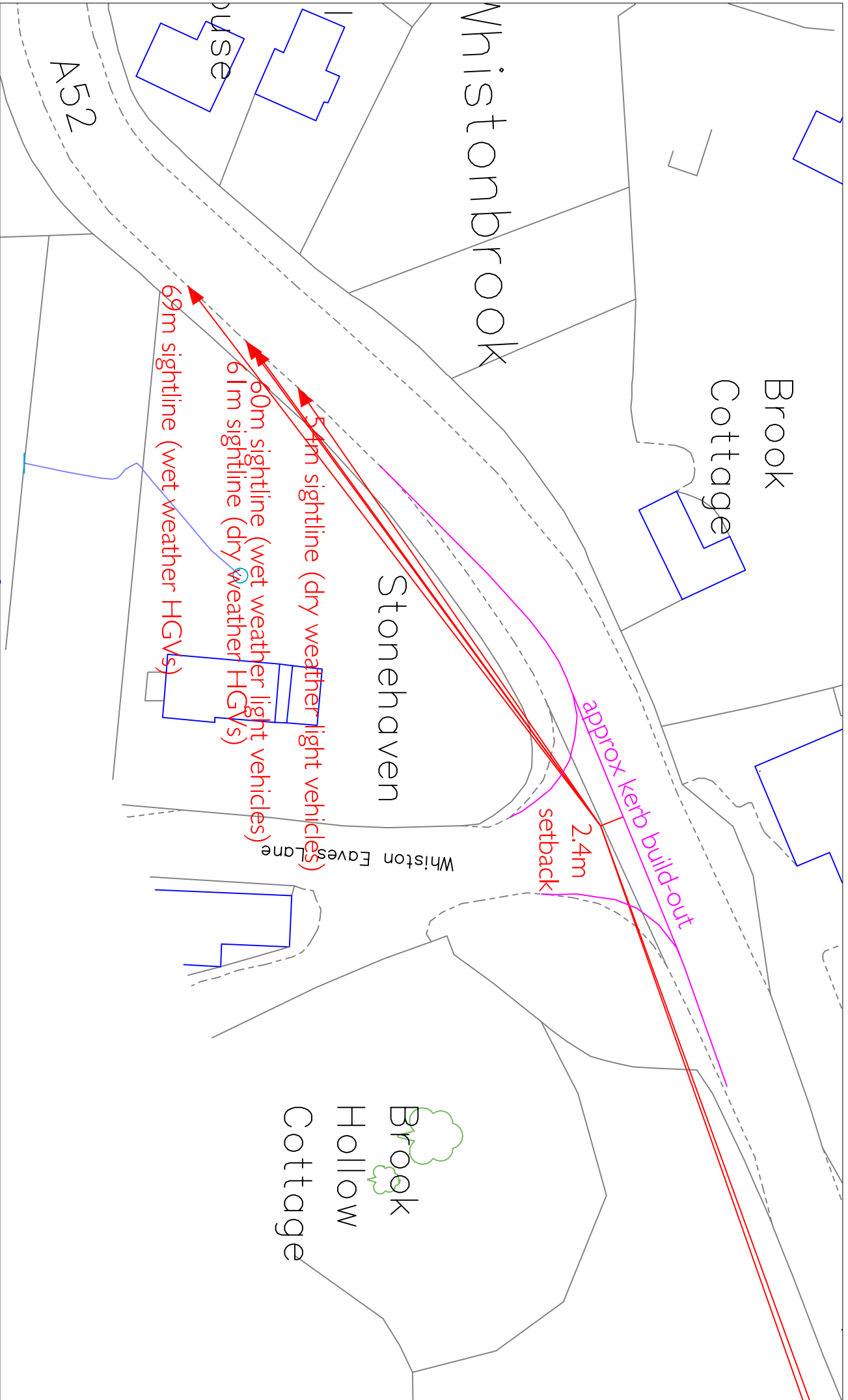


Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 / Whiston Eaves Lane Junction Option 2 (40mph Speed Limit)
 Sightline Assessment to East

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PAUL MEW ASSOCIATES
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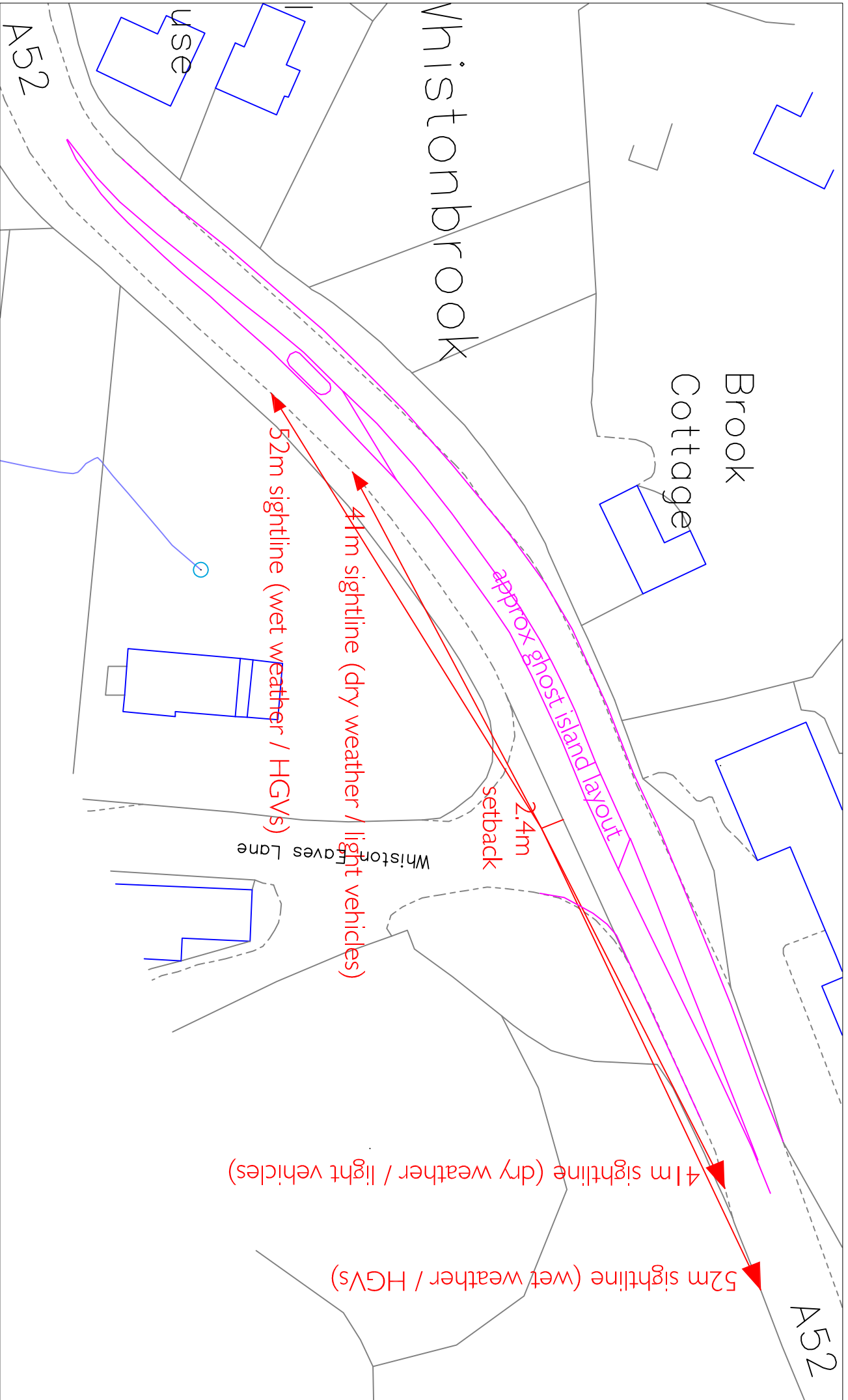
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 Source: Ordnance Survey



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 / Whiston Eaves Lane Junction Option 2 (40mph Speed Limit)
 Sightline Assessment to West



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Date: 27/09/17
 Scale: 1:500@A4
 Source: Ordnance Survey



Proposed Development At Moneystone Quarry, Eaves Lane, Whiston, Staffordshire, ST10 2DZ
 A52 / Whiston Eaves Lane Junction Option 1 (30mph Speed Limit)
 Sightline Assessment to East & West



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Appendix K
Highways Officer Recommendations - Ref: SMD/2014/0682



Staffordshire County Council
Town and Country Planning Act, 1990
Development Management Procedure Order 2010

To: Staffordshire Moorlands, DCM
 Staffordshire Moorlands District Council
 Moorlands House
 Stockwell Street
 Leek
 ST13 6HQ

Applicant: LAVER LEISURE (OAKAMOOD) LIMITED

Address: C/O AGENTS MR JON SUCKLEY
 HOW PLANNING LLP
 40 PETER STREET
 MANCHESTER
 M2 5GP

Application Type: OUTLINE

Application Number: SMD2014/0682

Date Received: 22-OCT-2014

Road Number: C0165

Officer: Jim long

Date: 03-FEB-2015

Particulars of Development:

OUTLINE PLANNING PERMISSION WITH ALL MATTERS RESERVED EXCEPT ACCESS FOR THE CONSTRUCTION OF A HIGH QUALITY LEISURE DEVELOPMENT COMPRISING HOLIDAY LODGES; A NEW CENTRAL HUB BUILDING (PROVIDING SWIMMING POOL, RESTAURANT, BOWLING ALLEY, SPA, GYM, INFORM

Location of Development:

MONEYSTONE QUARRY, WHISTON EAVES LANE, WHISTON, STAFFORDSHIRE

CONDITIONAL:

Recommendations: There are no objections on Highway grounds to the proposed development subject to the following conditions being included on any approval:-

1. The development hereby permitted shall not be brought into use until full details of the following have been submitted to and approved in writing by the Local Planning Authority:
 - layout of the site including disposition of buildings and provision of parking, turning and servicing within the site curtilage;
 - layout of the site to include the parking provision for staff parking.
 - means of surface water drainage from all areas intended to remain in private ownership;
 - full road construction including longitudinal sections and a satisfactory means of draining roads to an acceptable drainage outfall.
2. The development hereby permitted shall not be commenced until details of the off site highway works at the junction of Whiston Eaves Lane and the A52 indicated on drawing no. PB1608-SK001 rev B have been submitted to, and approved in writing by, the Local Planning Authority which shall incorporate further two-dimensional and three dimensional revisions as recommended by subsequent Safety Audits and be constructed prior to first occupation of development in accordance with the approved plans.
3. The Travel Plan which is hereby approved shall be implemented in accordance with the timetable set out in that plan unless otherwise agreed in writing by the Local Planning Authority. Reports demonstrating progress in promoting sustainable transport measures shall be submitted annually on each anniversary of the date of the planning consent to the Local Planning Authority for approval for a period of fifteen years from first occupation of the development permitted by this consent.
4. The development hereby permitted shall not be commenced until an off-site traffic management scheme comprising, a 30mph speed limit on the A52 at the junction with the C0165, Whiston Eaves Lane and a signage scheme detailing the permitted routeing for all traffic accessing and leaving the Park which has been submitted to and approved in writing by the Local Planning Authority. The approved traffic management scheme shall thereafter be implemented prior to first use of the development.
5. Prior to the submission of any Reserved Matters Application for the development hereby approved a detailed site layout plan shall be submitted to, and approved in writing by, the Local Planning Authority. The submitted layout plan shall include the following:

- Connections through the site and onto the public highway for pedestrians and cyclists
- Development phasing

The detailed layout plan shall be approved in writing by the Local Planning Authority prior to the approval of any Reserved Matters submission and shall have full regard to the relevant details as may be approved in accordance with the conditions pursuant to the Planning Permission SMD2014/0682/OUT. All Reserved Matters submissions in relation to the development hereby approved shall conform with the principles of the detailed layout plan.

6. The development hereby permitted shall not be commenced until a Construction Traffic Management Plan is submitted to and approved in writing by the Local Planning Authority detailing the management and routing of demolition/construction traffic ensuring such traffic travels in a northerly direction to and from the site, traffic management measures, delivery times, internal compound arrangements and wheel washing facilities. The approved Construction Traffic Management plan shall be implemented on the commencement of construction and thereafter be adhered to for the full period of construction unless otherwise agreed in writing by the Local Planning Authority.

Reasons for Recommendations

To comply with the policies contained within the National Planning Policy Framework, the principles contained within Manual for Streets and Policies contained within the Staffordshire Moorlands Core Strategy Development Plan 2014.

INFORMATIVE

A .Condition 2 above requiring off-site highway works shall require a Major Works Agreement with Staffordshire County Council and the applicant is therefore requested to contact Staffordshire County Council in respect of securing the Agreement. The link below provides a further link to a Major Works Agreement Information Pack and an application form for the Major Works Agreement. Please complete and send to the address indicated on the application form which is Network Management Unit, Staffordshire County Council, Staffordshire Place 1, Wedgwood Building, Tipping Street, Stafford, ST16 2DH (or email to nmu@staffordshire.gov.uk) <http://www.staffordshire.gov.uk/transport/staffshighways/licences/>

B. The proposed traffic management scheme referred to in condition 4 above requires an essential Traffic Regulation Order, to introduce a 30mph speed limit, for road safety mitigating works. This recommendation of approval should not be construed as though the County Council is prejudging of the Order making process. The developers should note that the Order will be made on behalf of the developer by Staffordshire County Council at the developers expense and has to be secured before development commences as it is an 'ESSENTIAL' component of the required mitigating measures associated with the proposed development. In case the Order is not already being processed the developer is requested to contact Dale Arthur/Jim Long with immediate effect to enable the Order to be secured at the earliest convenience to avoid delays to implementation of the planning consent. Please note that there are no guarantees that the Order will be successful. Condition 4 also requires the implementation of a signage strategy to advise the permitted routing for traffic accessing the Park will require the approval of the Highway Authority. The applicant is therefore requested to contact Network Management Unit at Staffordshire County Council, Staffordshire Place 1, Wedgwood Building, Tipping Street, Stafford, ST16 2DH (or email to nmu@staffordshire.gov.uk, to gain the relevant approvals.

This Form X is issued on the assumption that the developer enters into a Section 106 Agreement to secure the following:

£6,300 Travel Plan monitoring fee

£5,000 to procure the required Traffic Regulation Order

NOTES TO PLANNING OFFICER

This is an outline application with only means of access to the site assessed at this stage; accordingly the residential and commercial layout drawing submitted with the application is purely indicative and therefore the access to individual lodges and associated activities has not been assessed and will be considered fully at reserved matters stage incorporating the principles detailed in condition 5.

**for Director of Development Services
on behalf of the County Council
as Highway Authority**

Appendix L
Department for Transport's Circular 01/2013, 'Setting Local Speed Limits'

SETTING LOCAL SPEED LIMITS

CONTENTS

1. Introduction
 2. Background and objectives of the Circular
 3. The underlying principles of local speed limits
 4. The legislative framework
 5. The Speed Limit Appraisal Tool
 6. Urban speed management
 - 6.1. 20 mph speed limits and zones
 - 6.2. Traffic calming measures
 - 6.3. 40 and 50 mph speed limits
 7. Rural speed management
 - 7.1. Dual carriageway rural roads
 - 7.2. Single carriageway rural roads
 - 7.3. Villages
 8. References/Bibliography
- Appendix A Key pieces of speed limit, signing and related legislation and regulations

January 2013

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SECTION 1: INTRODUCTION

Key points

Speed limits should be evidence-led and self-explaining and seek to reinforce people's assessment of what is a safe speed to travel. They should encourage self-compliance. Speed limits should be seen by drivers as the maximum rather than a target speed.

Traffic authorities set local speed limits in situations where local needs and conditions suggest a speed limit which is lower than the national speed limit.

This guidance is to be used for setting all local speed limits on single and dual carriageway roads in both urban and rural areas.

This guidance should also be used as the basis for assessments of local speed limits, for developing route management strategies and for developing the speed management strategies which can be included in Local Transport Plans.

Traffic authorities are asked to keep their speed limits under review with changing circumstances, and to consider the introduction of more 20 mph limits and zones, over time, in urban areas and built-up village streets that are primarily residential, to ensure greater safety for pedestrians and cyclists, using the criteria in Section 6.

1. The Department for Transport has a vision for a transport system that is an engine for economic growth, but one that is also more sustainable, safer, and improves quality of life in our communities.
2. It is clear how setting appropriate speed limits with the aim of achieving safe and appropriate driving speeds can play an important role in supporting this vision. This guidance sets out the framework that traffic authorities should follow when setting and reviewing local speed limits.
3. Roads should be designed so that mistakes made by road users do not result in death or serious injury. Effective speed management is part of creating a safe road environment which is fit for purpose. It involves many components designed to work together to require, encourage and help road users to adopt appropriate and safe speeds below the speed limit. As well as being the legal limit, speed limits are a key source of information to road users, particularly as an indicator of the nature and risks posed by that road both to themselves and to all other road users. Speed limits should, therefore, be evidence-led and self-explaining, and seek to reinforce people's assessment of what is a safe speed to travel and encourage self-compliance. They should be seen by drivers as the maximum speed rather than as a target speed at which to drive

irrespective of conditions. It is often not appropriate or safe to drive at the maximum speed limit.

4. The overall speed limit framework, including the setting of national limits for different road types, and which exceptions to these general limits can be applied, is the responsibility of the government. The three national speed limits are:
 - the 30 mph speed limit on roads with street lighting (sometimes referred to as Restricted Roads)
 - the national speed limit of 60 mph on single carriageway roads
 - the national speed limit of 70 mph on dual carriageways and motorways.

These national limits are not, however, appropriate for all roads. The speed limit regime enables traffic authorities to set local speed limits in situations where local needs and conditions suggest a speed limit which is different from the respective national speed limit.

5. Local speed limits are determined by traffic authorities having regard to guidance issued by the Department for Transport. This guidance applies to England and supersedes that previously contained in DfT Circular 01/2006, which is now cancelled.¹
6. The guidance retains and builds upon many of the underlying principles of DfT Circular 01/2006, but provides additional evidence of the safety and wider benefits of setting appropriate speed limits. It builds on the responses received to the consultation held by the Department in 2012 as well as to an earlier consultation held in 2009.
7. It is aimed primarily at traffic authorities responsible for setting local speed limits, but is also designed to help improve the wider understanding of why and how local speed limits are determined.
8. The guidance is to be used for setting all local speed limits on single and dual carriageway roads in both urban and rural areas. It brings together some of the main features of other published guidance on speed limit related issues, including speed-related road traffic regulation and signing, street lighting, traffic calming, speed limits in villages, and 20 mph speed limits and zones.
9. The guidance should not, however, be used in isolation, but read in conjunction with the more comprehensive advice on these matters set out in the appropriate Traffic Advisory Leaflets and with the relevant

¹ In Wales, *Setting Local Speed Limits in Wales*, Welsh Assembly Government Circular No: 24/2009, issued by the Welsh Assembly Government in October 2009, is in use and in Scotland, *Setting Local Speed Limits: Guidance for Local Authorities*: ETLLD Circular 1/2006 applies.

legislation, including the Traffic Signs Regulations and General Directions 2002 (TSRGD 2002)².

10. This guidance introduces, in section 5, the Speed Limit Appraisal Tool, a web-based tool available at <https://www.gov.uk/government/publications/speed-limit-appraisal-tool>. It has been designed to help local authorities assess the full costs and benefits of any proposed schemes and make robust, evidence-based decisions about which limits they put in place.

Priorities for action

11. The guidance in this Circular should be used as the basis for:
- assessments of local speed limits;
 - developing route management strategies; and
 - developing speed management strategies.
12. Traffic authorities are asked to:
- **keep their speed limits under review** with changing circumstances;
 - consider the **introduction of more 20 mph limits and zones, over time, in urban areas and built-up village streets that are primarily residential**, to ensure greater safety for pedestrians and cyclists, using the criteria in Section 6.

² Please note that all references to legislation within this Circular are references to that legislation as amended.

SECTION 2: BACKGROUND AND OBJECTIVES OF THE CIRCULAR

Key points

Traffic authorities continue to have the flexibility to set local speed limits that are appropriate for the individual road, reflecting local needs and taking account of all local considerations.

Local speed limits should not be set in isolation, but as part of a package with other measures to manage vehicle speeds and improve road safety.

Background

13. Setting speed limits at the appropriate level for the road, and ensuring compliance with these limits, play a key part in ensuring greater safety for all road users. The relationship between speed and likelihood of collision as well as severity of injury is complex, but there is a strong correlation. As a general rule for every 1 mph reduction in average speed, collision frequency reduces by around 5% (Taylor, Lynam and Baruya, 2000). For typical types of road traffic collisions the risk of death for drivers and pedestrians involved reduces with reduced vehicle speeds and it is particularly important to consider those speeds where the balance tips in favour of survival.
14. Reported road casualty statistics also show the role of *exceeding the speed limit* and *travelling too fast for the conditions* as contributory factors in road traffic collisions. In 2011 at least one of these two factors was reported in 12 per cent of all accidents and these accidents accounted for 25 per cent of all fatalities. Other reported contributory factors such as *loss of control* or *careless, reckless or in a hurry* can often be related to excess or inappropriate speed, and even where the contributory factors are unrelated to the vehicle speed, higher speeds will often aggravate the outcome of the collision and injuries. It should be recognised that identification of contributory factors is largely subjective and is not necessarily the result of extensive investigation.
15. This updated guidance provides part of the framework for speed limits, where local authorities can set speed limits on their roads below the national limit, in response to local risk factors and conditions. It will help ensure appropriate and consistent speed limits, which will contribute to reducing the number of road deaths, as well as casualties overall; tackling pedestrian and cyclist casualties in towns and cities; improving the safety on rural roads; and reducing variations in safety from area to area and road to road.

16. The objectives of this guidance also fit into the context of some wider transport and cross-government priorities, which those responsible for setting local speed limits should bear in mind:
- The Department for Transport's vision is for a transport system that is an engine for economic growth but one that is also greener and safer and improves quality of life in our communities.
 - We also want our roads to become safer, less congested and less polluted.
 - We want to encourage sustainable local travel and economic growth by making public transport and cycling and walking more attractive and effective, promoting lower carbon transport and tackling local road congestion.
 - We want to contribute to wider public health and safety outcomes by contributing to a reduction in road casualties.

Objectives of the Circular

17. The key objectives of this guidance are:
- the provision of up-to-date and consistent advice to traffic authorities;
 - improved clarity which will aid greater consistency of speed limits across the country;
 - enabling the setting of more appropriate local speed limits, including lower or higher limits where conditions dictate;
 - achieving local speed limits that better reflect the needs of all road users, not just motorised vehicles;
 - ensuring improved quality of life for local communities and a better balance between road safety, accessibility and environmental objectives, especially in rural communities;
 - improved recognition and understanding by road users of the risks involved on different types of road, the speed limits that apply, and the reasons why;
 - improved respect for speed limits, and in turn improved compliance; and
 - continued reductions in the number of road traffic collisions, injuries and deaths in which excessive or inappropriate speed is a contributory factor.
18. Speed limits are only one element of speed management. Local speed limits should not be set in isolation. They should be part of a package with other speed management measures including engineering and road geometry that respect the needs of all road users and raise the driver's awareness of their environment; education; driver information; training and publicity. Within their overall network management responsibilities, these measures should enable traffic authorities to deliver speed limits and, as importantly, actual vehicle speeds that are safe and appropriate for the road and its surroundings. The measures should also help drivers to be more readily aware of the road environment and to drive at an appropriate speed at all times.

19. Unless a speed limit is set with support from the local community, the police and other local services, with supporting education, and with consideration of whether engineering measures are necessary to reduce speeds; or if it is set unrealistically low for the particular road function and condition, it may be ineffective and drivers may not comply with the speed limit.

20. If many drivers continued to travel at unacceptable speeds, the risk of collisions and injuries would increase and significant and avoidable enforcement activity would be needed

SECTION 3: THE UNDERLYING PRINCIPLES OF LOCAL SPEED LIMITS

Key points

The Highways Agency is responsible for determining speed limits on the trunk road network. Local traffic authorities are responsible for determining speed limits on the local road network.

It is important that traffic authorities and police forces work closely together in determining, or considering, any changes to speed limits.

The full range of speed management measures should always be considered before a new speed limit is introduced.

The underlying aim should be to achieve a 'safe' distribution of speeds. The **key factors that should be taken into account in any decisions** on local speed limits are:

- **history of collisions;**
- **road geometry and engineering;**
- **road function;**
- **Composition of road users** (including existing and potential levels of vulnerable road users);
- **existing traffic speeds;** and
- **road environment.**

While these factors need to be considered for all road types, they may be weighted differently in urban or rural areas. The impact on community and environmental outcomes should also be considered.

The minimum length of a speed limit should generally be not less than 600 metres to avoid too many changes of speed limit along the route.

Speed limits should not be used to attempt to solve the problem of isolated hazards, such as a single road junction or reduced forward visibility, e.g. at a bend.

Responsibility for local speed limits

21. The Highways Agency is responsible for determining speed limits on the trunk road network, and local traffic authorities are responsible for determining speed limits on the local road network. In this Circular, the term 'traffic authority' is used to denote both the Highways Agency and local traffic authorities.
22. It is important that traffic authorities and police forces work together closely and from an early stage when considering or determining any changes to

speed limits. This may be through the local road safety partnership arrangements. It is also important that neighbouring traffic authorities work closely together, especially where roads cross boundaries, to ensure speed limits remain consistent. As part of the process of making a speed limit order, consultation of those affected is of key importance and, together with good information about planned changes, this will improve support for and compliance with new limits. The legislative requirements are summarised in Section 4.

Considerations in setting local speed limits

23. A study of types of crashes, their severity, causes and frequency, together with a survey of traffic speeds, should indicate whether an existing speed limit is appropriate for the type of road and mix of use by different groups of road users, including the presence or potential presence of vulnerable road users (including people walking, cycling or riding horses, or on motorbikes), or whether it needs to be changed. Local residents may also express their concerns or desire for a lower speed limit and these comments should be considered.
24. Where limits for air quality are in danger of being exceeded, compliance with those air quality limits could be an important factor in the choice of speed limit. But depending on the individual circumstances the imposition of a speed limit will not always be the solution. And the visible characteristics of a road affect the speed that a driver chooses: to be effective, the reasons for a limit need to be apparent.
25. It may well be that a speed limit need not be changed if the collision rate can be improved or wider quality of life objectives can be achieved through other speed management measures, or other measures. These alternative measures should always be considered before proceeding with a new speed limit.
26. Where there is poor compliance with an existing speed limit on a road or stretch of road the reasons for the non-compliance should be examined before a solution is sought. If the speed limit is set too low for no clear reason and the risk of collisions is low, then it may be appropriate to increase the limit. If the existing limit is in place for a good reason, solutions may include engineering measures or changes to the road environment to ensure it better matches the speed limit, or local education and publicity. Enforcement may also be appropriate, but should be considered only after the other measures and jointly with the police force.

The underlying principles

27. The aim of speed management policies should be to achieve a safe distribution of speeds consistent with the speed limit that reflects the function of the road and the road environment. This should imply a mean

speed appropriate to the prevailing road environment, and all vehicles moving at speeds below or at the posted speed limit, while having regard to the traffic conditions.

28. The estimated collision and injury savings should also be an important factor when considering changes to a local speed limit. Another key factor when setting a speed limit is what the road looks like to the road users. Drivers are likely to expect and respect lower limits, and be influenced when deciding on what is an appropriate speed, where they can see there are potential hazards, for example outside schools, in residential areas or villages and in shopping streets.
29. A principal aim in determining appropriate speed limits should, therefore, be to provide a consistent message between speed limit and what the road looks like, and for changes in speed limit to be reflective of changes in the road layout and characteristics.
30. The following will be **important factors when considering what is an appropriate speed limit**:
 - **history of collisions**, including frequency, severity, types and causes;
 - **road geometry and engineering** (width, sightlines, bends, junctions, accesses and safety barriers etc.);
 - **road function** (strategic, through traffic, local access etc.);
 - **Composition of road users** (including existing and potential levels of vulnerable road users);
 - **existing traffic speeds**; and
 - **road environment**, including level of road-side development and possible impacts on residents (e.g. severance, noise, or air quality).

While these factors need to be considered for all road types, they may be weighted differently in urban or rural areas. The impact on community and environmental outcomes should also be considered.

31. Before introducing or changing a local speed limit, traffic authorities will wish to satisfy themselves that the expected benefits exceed the costs. Many of the costs and benefits do not have monetary values associated with them, but traffic authorities should include an assessment of the following factors:
 - collision and casualty savings;
 - conditions and facilities for vulnerable road users;
 - impacts on walking and cycling and other mode shift;
 - congestion and journey time reliability;
 - environmental, community and quality of life impact, such as emissions, severance of local communities, visual impact, noise and vibration; and
 - costs, including of engineering and other physical measures including signing, maintenance and cost of enforcement.

The speed limit appraisal toolkit, found at section 5, will help assess the full costs and benefits of any proposed schemes.

32. Different road users perceive risks and appropriate speeds differently, and drivers and riders of motor vehicles often do not have the same perception of the hazards of speed as do people on foot, on bicycles or on horseback. Fear of traffic can affect peoples' quality of life and the needs of vulnerable road users must be fully taken into account in order to further encourage these modes of travel and improve their safety. Speed management strategies should seek to protect local community life.
33. In order to ensure compliance with a new lower local limit, as well as make it legally enforceable, it is important that the limit is signed correctly and consistently. The introduction of a new Speed Limit Order must coincide with the signing of the new limit. Traffic Authorities must ensure that speed limits meet the legislative process and the requirements of the TSRGD. Any new limit should also be accompanied by publicity and, where appropriate, effective engineering changes to the road itself. Without these measures, the new limit is unlikely to be fully complied with.
34. On rural roads there is often a difference of opinion as to what constitutes a reasonable balance between the risk of a collision, journey efficiency and environmental impact. Higher speed is often perceived to bring benefits in terms of shorter travel times for people and goods. However, evidence suggests that when traffic is travelling at constant speeds, even at a lower level, it may result in shorter and more reliable overall journey times, and that journey time savings from higher speed are often overestimated (Stradling *et al.*, 2008). The objective should be to seek an acceptable balance between costs and benefits, so that speed-management policies take account of environmental, economic and social effects as well as the reduction in casualties they are aiming to achieve.
35. Mean speed and 85th percentile speed (the speed at or below which 85% of vehicles are travelling) are the most commonly used measures of actual traffic speed. Traffic authorities should continue to routinely collect and assess both, but mean speeds should be used as the basis for determining local speed limits.
36. For the majority of roads there is a consistent relationship between mean speed and 85th percentile speed. Where this is not the case, it will usually indicate that drivers have difficulty in deciding the appropriate speed for the road, suggesting that a better match between road design and speed limit is required. It may be necessary to consider additional measures to reduce the larger than normal difference between mean and 85th percentile speeds or to bring the speed distribution more in line with typical distributions. The aim for local speed limits should be to align the speed limit to the conditions of the road and road environment.
37. The minimum length of a speed limit should generally be not less than 600 metres to avoid too many changes of speed limit along the route. In

exceptional circumstances this can be reduced to 400 metres for lower speed limits, or even 300 metres on roads with a purely local access function, or where a variable 20 mph limit is introduced, for example outside a school. Anything shorter is not recommended. The length adopted for a limit will depend on the limit applied and also on the conditions at or beyond the end points. The terminal points of speed limits need to take account of the particular local circumstances, such as steep gradients, sharp bends, junctions, access roads, humpbacked bridges or other hazards, and also good visibility of the signs, and an extension of the speed limit may be needed to ensure this.

38. For consistency within routes, separate assessments should be made for each length of road of 600 metres or more for which a different speed limit might be considered appropriate. When this is completed, the final choice of appropriate speed limit for individual sections might need to be adjusted to provide reasonable consistency over the route as a whole.
39. Occasionally it may be appropriate to use a short length of 40 mph or 50 mph speed limit as a transition between a length of road subject to a national limit and another length on which a lower limit is in force, for example on the outskirts of villages or urban areas with adjoining intermittent development. However, the use of such transitional limits should be restricted to sections of road where immediate speed reduction would cause risks or is likely to be less effective.
40. Speed limits should not be used to attempt to solve the problem of isolated hazards, for example a single road junction or reduced forward visibility such as at a bend, since speed limits are difficult to enforce over such a short length. Other measures, such as warning signs including vehicle activated signs, carriageway markings, junction improvements, superelevation of bends and new or improved street lighting, are likely to be more effective in addressing such hazards. Similarly, crossings or, in rural areas, the provision of adequate footways can be a more effective means of improving pedestrian safety than lowering a speed limit over a short distance.
41. Where several roads with different speed limits enter a roundabout, the roundabout should be restricted at the same level as the majority of the approach roads. If there is an equal division, for example where a 30 mph road crosses one with a limit of 40 mph, the roundabout itself should take the lower limit.

SECTION 4: THE LEGISLATIVE FRAMEWORK

Key points

All speed limits, other than those on restricted roads, should be made by order under Section 84 of the Road Traffic Regulation Act 1984.

Any speed limits below 30 mph, other than 20 mph limits or 20 mph zones, require individual consent from the Secretary of State.

Unless an order has been made and the road is signed to the contrary, a 30 mph speed limit applies where there is a system of street lighting furnished by means of lamps placed not more than 200 yards apart.

Traffic authorities have a duty to erect and maintain prescribed speed limit signs on their roads in accordance with the Traffic Signs Regulations and General Directions 2002 (TSRGD 2002).

If traffic authorities wish to deviate from what is prescribed in signing regulations, they must first gain the Secretary of State's authorisation.

Traffic authorities are not permitted to erect different speed limit signs relating to different classes of vehicle.

Vehicle-activated signs must not be used as an alternative to standard static signing, but as an additional measure to warn drivers of a potential hazard or to remind them of the speed limit in force.

Main speed limit legislation

42. Most road traffic law pertaining to speed limits is contained in the Road Traffic Regulation Act 1984 (RTRA 1984). Other relevant legislation includes the Highways Act 1980, in particular Sections 90A-F concerning the construction and maintenance of road humps and Sections 90G-I concerning other traffic-calming works.
43. Part VI of the RTRA 1984 deals specifically with speed limits, with Sections 81-84 dealing with different speed limits and the speed limit order-making process. Section 82(1)(a) defines a restricted road in England and Wales as a road on which there is provided "a system of street lighting furnished by means of lamps placed not more than 200 yards apart". Section 81 makes it an offence for a person to drive a motor vehicle at a speed of more than 30 mph on a restricted road.
44. The establishment of speed limits is also a method through which legal sanctions can be brought to bear on those who exceed the limit set on a

particular road. It is therefore important to preserve carefully all records relating to the making and validity of a speed limit and speed limit signs.

45. All speed limits, other than those on restricted roads or special roads (a highway which is a special road in accordance with s 16 of the Highways Act 1980), should be made by order under Section 84 of the RTRA 1984. This includes the making of a 30 mph speed limit on an unlit road.
46. All speed limits other than the national limits are made by speed limit order. Traffic authorities should comply with their own consultation procedures and must, as a minimum, follow the full consultation procedure set out in legislation, before any new speed limit is introduced. More detail about these requirements is in Appendix A.

Restricted roads

47. Section 82(2) RTRA 1984 (as amended) gives traffic authorities powers to remove restricted road status, and give restricted road status to roads which are not restricted. However, the Department's policy on the use of this power is that it should be used only to reinstate restricted road status in those cases where a road which has a system of street lighting has previously had its restricted road status removed.
48. If a road with street lighting has a 40 mph limit and this is to be reduced to 30 mph, the 40 mph order under Section 84 should be revoked. Assuming the street lamps are no more than 200³ yards apart, the road will be a restricted road by virtue of section 82(1)(a) RTRA. Similarly, where a speed limit of 30 mph is imposed by order under Section 84 because there is no street lighting, that order should be revoked if street lighting is subsequently provided. The Department considers that it is best practice for traffic authorities to make an order under section 84 RTRA to create a 30mph speed limit on an unlit stretch of road.
49. Any speed limits below 30 mph, other than 20 mph limits or 20 mph zones, require individual consent from the Secretary of State.

Street lighting

50. Direction 11 of the Traffic Signs Regulations and General Directions 2002 (TSRGD 2002), as amended, defines the requirements for the placing of speed-limit repeater signs. This states that speed-limit repeater signs cannot be placed along a road on which there is carriageway lighting not more than 183 metres apart and which is subject to a 30 mph speed limit. This direction applies regardless of how the speed limit has been imposed.
51. The Department will not make exceptions to this rule. This means it should be assumed that, unless an order has been made and the road is signed

³ Older legislation specifies 200 yards; later legislation specifies 183 metres. These are equivalent measures.

to the contrary, a 30 mph speed limit applies where there are three or more lamps throwing light on the carriageway and placed not more than 183 metres apart.

Speed limit signing

52. While increased understanding and acceptance of why a speed limit applies on a certain road will help compliance, drivers are aided by clear, visible and regular signing which enables them unhesitatingly to know what speed limit is in force.
53. Under Section 85 of the RTRA 1984 it is the duty of the traffic authority to erect and maintain prescribed speed limit signs on their roads in accordance with the Secretary of State's directions. The Traffic Signs Regulations and General Directions 2002 prescribe the designs and conditions of use for traffic signs, including speed limit signing, in England, Scotland and Wales.
54. Traffic authorities should generally follow these Regulations when signing speed limits. If a traffic authority wishes to deviate from what is prescribed, it must first obtain the Secretary of State's authorisation, and signing that is not in line with the Regulations must not be installed without such authorisation. Authorisation applications should be sent to the Department for Transport.
55. Speed limit signs which do not comply with the Regulations or which have not been authorised by the Secretary of State are not lawfully placed. Where the sign is not lawfully placed, no offence is committed by a person exceeding the signed speed limit and any prosecutions are likely to fail accordingly. Traffic authorities should therefore remove any unlawful signs, bring them into compliance with the Regulations or obtain authorisation to make them lawful.
56. Lower maximum speed limits apply on certain roads to certain traffic classes of vehicles. These are set out in Schedule 6 of the RTRA 1984 and in the Highway Code. Drivers of these vehicles are expected to be aware of this and follow these special limitations without having to be reminded by specific speed limit signs for particular vehicles. Traffic authorities are not permitted to erect different speed limit signs relating to different classes of vehicle.
57. Vehicle-activated signs (VAS), triggered by an approaching vehicle, have been developed to help address the problem of inappropriate speed. They must not be used as an alternative to standard static signing, but as an additional measure to warn drivers of a potential hazard or to remind them of the speed limit in force. VAS have proved particularly effective in rural areas, including at the approaches to junctions and bends. The Department has provided guidance in Traffic Advisory Leaflet 1/03 *Vehicle Activated Signs* (DfT, 2003).

58. The legislation does not prescribe the use of countdown markers on the approach to speed limit terminal signs, and research has shown that they generally have little or no effect on vehicle speeds and can add to sign clutter.
59. Chapter 3 of the Traffic Signs Manual (Department for Transport, 2008) provides guidance to local traffic authorities on best practice when signing speed limits. It includes tables and pictures to illustrate where speed limit signs should be placed. This complements TSRGD 2002, which sets out the mandatory requirements for signing.

Traffic Regulation Orders

60. If speed limits are to be legally implemented and enforceable, Traffic Orders must be made. Part VI of the Road Traffic Regulation Act (RTRA) 1984 deals specifically with speed limits and includes the powers under which Traffic Authorities may make speed limit orders.
61. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 sets out the procedure to be followed when making these (and other) orders. Traffic Authorities will need to comply with the consultation and publicity requirements before making an order, and with the publicity and traffic signing requirements once an order has been made.
62. Traffic Authorities may find it more efficient to produce speed limit orders for 20 mph zones or limits, or to introduce speed limit changes as a result of rural speed limit reviews, where these cover a number of roads, through one order covering all those roads covered by the new speed limit. If they decide to proceed in this manner it is particularly important to ensure that the order is comprehensive and correct, and that the consultation and publicity is directed at those likely to be affected.
63. Further key pieces of legislation and regulations relating to speed limit and related signing are referred to in Appendix A.

SECTION 5: THE SPEED LIMIT APPRAISAL TOOL

64. In the Strategic Framework for Road Safety (DfT, May 2011) the Department for Transport announced that it would provide a new speed limit appraisal tool to help local authorities assess the full costs and benefits of any proposed schemes and help make evidence-based decisions to introduce local speeds that reflect the needs of all road users.
65. The tool is available at <https://www.gov.uk/government/publications/speed-limit-appraisal-tool> and local authorities are invited, though not required, to use it. Its use is free of charge and is not restricted to local authorities.
66. The tool has been designed to enable local highway authority officers and other professionals to:
- forecast mean and 85th percentile speeds for speed limit changes
 - forecast changes to: journey times separately for business and personal users; vehicle operating costs including fuel; accidents by severity; CO2 emissions; and NOX emissions; and
 - appraise changes in speed limits to 20mph, 30mph, 40mph, 50mph, 60mph and, on dual carriageways, 70mph.
67. In addition to enabling a local highway authority to decide whether or not to introduce a new speed limit scheme, the tool introduces transparency in the decision making process. It also provides a facility that encourages local highway authorities to adopt a more consistent appraisal process, whilst still allowing the flexibility for the highway authority to take into account local road conditions and the surrounding environment.
68. Full User Guidance is provided with the tool covering instructions on how to run the appraisal tool, and also a practical guide to the assessment of a range of aspects that local authorities should consider when planning to introduce a change in speed limits. The guidance should therefore be read in conjunction with this circular.
69. The tool has been developed to be economical to apply and straightforward to operate, and to provide informative outputs that can be flexibly interpreted in the context of the local highway authority's requirements. At its basic level, it does not call for specialist skills such as demand modelling and environmental analysis.
70. The Guidance describes how the tool deals with those aspects of speed limit changes that can be quantified, such as accidents, journey time savings and CO2 emissions, and those that presently cannot be quantified

because of a lack of evidence, such as journey time reliability, model shift and impacts on public anxiety.

71. Reference is made throughout the document to current DfT guidance and relevant WebTAG⁴ units to help the user compile the data that is required to run the tool and to guide the reader to more detailed information, should this be required.
72. The tool outputs are presented in Excel table formats that show economic impacts and other quantifiable impacts, and makes provision for non-quantified information also to be presented in both the data entry tables and the output reporting tables.
73. The output spreadsheets should be considered as a starting point for developing the appraisal into a case that can be readily understood and appreciated by a range of people, and which reflects wider considerations than the quantitative values that the tool provides.
74. Details on how the relationships that are used in the tool were developed are set out in an annex to the User Guidance, enabling the reader to gain an understanding of the background calculations that the tool is performing.

⁴ Department for Transport Web-based Transport Analysis Guidance

SECTION 6: URBAN SPEED LIMITS

Key points

Speed limits in urban areas affect everyone, not only as motorists, but as pedestrians, cyclists and residents. As well as influencing safety they can influence quality of life, the environment and the local economy.

Traffic authorities are encouraged to adopt the Institution of Highways and Transportation's⁵ urban safety management guidelines (see IHT, 2003), in which road hierarchies are adopted that reflect a road's function and the mix of traffic that it carries.

The national speed limit on street lit roads is 30 mph.

Traffic authorities can, over time, introduce 20mph speed limits or zones on:

- Major streets where there are – or could be - significant numbers of journeys on foot, and/or where pedal cycle movements are an important consideration, and this outweighs the disadvantage of longer journey times for motorised traffic.

This is in addition to

- Residential streets in cities, towns and villages, particularly where the streets are being used by people on foot and on bicycles, there is community support and the characteristics of the street are suitable.

Where they do so, general compliance needs to be achievable without an excessive reliance on enforcement.

Roads suitable for a 40 mph limit are generally higher quality suburban roads or those on the outskirts of urban areas where there is little development. Usually, the movement of motor vehicles is the primary function.

In exceptional circumstances, 50 mph limits can be implemented on special roads and dual carriageways, radial routes or bypasses where the road environment and characteristics allow this speed to be achieved safely.

75. Urban roads by their nature are complex as they need to provide for safe travel on foot, bicycle and by motorised traffic. Lower speeds benefit all urban road users, and setting appropriate speed limits is therefore an important factor in improving urban safety. Traffic authorities are

⁵ IHT are now called Chartered Institution of Highways and Transportation, CIHT.

encouraged to adopt the urban safety management guidelines published by the Institution of Highways and Transportation (IHT, 2003), in which road hierarchies are adopted that reflect a road's function and the mix of traffic that it carries. Within this approach the principle should be to ensure that the appropriate traffic travels on the appropriate roads, and at an appropriate speed. This can help balance what can be competing demands for higher or lower speed limits.

76. It is on urban roads that the majority of road casualties occur, including 87% of all pedestrian and 83% of all pedal cyclists casualties (DfT, 2011). Collisions typically involve pedestrians and cyclists, including children, and knowledge of the relationship between vehicle speed and injury severity in any collision must inform decisions on speed limits. Research has shown that the risk of a pedestrian dying in a collision with a car increases slowly up to an impact speed of around 30mph, but at speeds above 30 mph the risk of death increases rapidly (Rosén and Sander, 2009). Car occupants also benefit from lower speeds. Research in London showed that the largest casualty reductions associated with 20mph zones were children killed and seriously injured, and car occupants (Grundy et al, 2008)
77. The standard speed limit in urban areas is 30 mph, which represents a balance between mobility and safety factors. However, for residential streets and other town and city streets with high pedestrian and cyclist movement, local traffic authorities should consider the use of 20 mph schemes. On dual carriageways where the road environment and characteristics allow, traffic authorities can also implement 40 mph and, in exceptional circumstances, 50 mph limits. Generally, efforts should be made to promote the use of suitable routes for urban through traffic and to manage the speed of traffic requiring access to residential streets using traffic calming and associated techniques.
78. In many urban centres, main traffic routes often have a mixture of shopping, commercial and/or residential functions. These mixed priority routes are complex and difficult to treat, but the most successful measures have included speed management to keep speed at appropriate levels in the context of both 20 and 30 mph limits and a reassignment of space to the different functions, taking into account the needs of people on foot or on bikes. Sometimes a decision about a road's primary or most important function needs to be taken.

6.1 20 MPH SPEED LIMITS AND ZONES

79. 20 mph zones and limits are now relatively wide-spread, with more than 2,000 schemes in operation in England, the majority of which are 20 mph zones.
80. **20 mph zones** require traffic calming measures (e.g. speed humps, chicanes) or repeater speed limit signing and/or roundel road markings at regular intervals, so that no point within a zone is more than 50 m from

such a feature. In addition, the beginning and end of a zone is indicated by a terminal sign. Zones usually cover a number of roads.

81. **20 mph limits** are signed with terminal and at least one repeater sign, and do not require traffic calming. 20 mph limits are similar to other local speed limits and normally apply to individual or small numbers of roads but are increasingly being applied to larger areas.
82. There is clear evidence of the effect of reducing traffic speeds on the reduction of collisions and casualties, as collision frequency is lower at lower speeds; and where collisions do occur, there is a lower risk of fatal injury at lower speeds. Research shows that on urban roads with low average traffic speeds any 1 mph reduction in average speed can reduce the collision frequency by around 6% (Taylor, Lynam and Baruya, 2000). There is also clear evidence confirming the greater chance of survival of pedestrians in collisions at lower speeds.
83. Important benefits of 20 mph schemes include quality of life and community benefits, and encouragement of healthier and more sustainable transport modes such as walking and cycling (Kirkby, 2002). There may also be environmental benefits as, generally, driving more slowly at a steady pace will save fuel and reduce pollution, unless an unnecessarily low gear is used. Walking and cycling can make a very positive contribution to improving health and tackling obesity, improving accessibility and tackling congestion, and reducing carbon emissions and improving the local environment.
84. Based on this positive effect on road safety, and a generally favourable reception from local residents, traffic authorities are able to use their power to introduce 20mph speed limits or zones on:

- Major streets where there are – or could be - significant numbers of journeys on foot, and/or where pedal cycle movements are an important consideration, and this outweighs the disadvantage of longer journey times for motorised traffic.

This is in addition to

- Residential streets in cities, towns and villages, particularly where the streets are being used by people on foot and on bicycles, there is community support and the characteristics of the street are suitable.
85. Successful 20 mph zones and 20 mph speed limits are generally self-enforcing, i.e. the existing conditions of the road together with measures such as traffic calming or signing, publicity and information as part of the scheme, lead to a mean traffic speed compliant with the speed limit. To achieve compliance there should be no expectation on the police to

provide additional enforcement beyond their routine activity, unless this has been explicitly agreed.

86. Evidence from successful 20 mph schemes shows that the introduction of 20 mph zones generally reduces mean traffic speed by more than is the case when a signed-only 20 mph limit is introduced. Historically, more zones than limits have been introduced.
87. A comprehensive and early consultation of all those who may be affected by the introduction of a 20 mph scheme is an essential part of the implementation process. This needs to include local residents, all tiers of local government, the police and emergency services, public transport providers and any other relevant local groups (including for example, groups representing pedestrians, cyclists, drivers, or equestrians). Further details about consultations are set out in Appendix A.
88. It is important to consider the full range of options and their benefits, both road safety and wider community and environmental benefits and costs, before making a decision as to the most appropriate method of introducing a 20 mph scheme to meet the local objectives and the road conditions.

20 mph zones

89. 20 mph zones are very effective at reducing collisions and injuries. Research in 1996 showed that overall average annual collision frequency could fall by around 60%, and the number of collisions involving injury to children could be reduced by up to two-thirds. Zones may also bring further benefits, such as a modal shift towards more walking and cycling and overall reductions in traffic flow, where research has shown a reduction by over a quarter (Webster and Mackie, 1996). There is no evidence of migration of collisions and casualties to streets outside the zone. (Grundy et al, 2008; Grundy et al, 2009).
90. 20 mph zones are predominantly used in urban areas, both town centres and residential areas, and in the vicinity of schools. They should also be used around shops, markets, playgrounds and other areas with high pedestrian or cyclist traffic, though they should not include roads where motor vehicle movement is the primary function. It is generally recommended that they are imposed over an area consisting of several roads.
91. A 20 mph zone is indicated by 20 mph zone entry and exit signs (TSRGD, diagrams 674 and 675). The statutory provisions (direction 16(1) TSRGD) require that no point within the zone must be further than 50 metres from a traffic calming feature (unless in a cul-de-sac less than 80 metres long).
92. The Department has recently made significant changes to facilitate and reduce the cost for providing 20 mph zones in England. Traffic authorities can now place any of the following:

- a) repeater speed sign (TSRGD diagram 670)
 - b) a speed roundel road marking (TSRGD diagram 1065)
 - c) or a combination of both of these signs
 - d) traffic calming features
93. At least one traffic calming feature as defined in direction 16(2) TSRGD must be placed in a 20 mph zone and the features and signing must still be placed at intervals not greater than 100 metres: it is not the intention to remove physical features, but to ensure that the most appropriate measure is used to ensure the continuity of the zone. Only where speeds are already constrained to near the limit should local authorities consider placing the speed limit sign or a roundel marking, in addition to physical features within a zone.
94. These new arrangements should significantly reduce the requirement for signing and traffic calming features. Traffic authorities can now incorporate wider areas within a 20 mph zone, by effectively signing 20mph speed limits on distributor roads where traffic calming features are not suitable, or for small individual roads or stretches of road, where mean speeds are already at or below 24 mph. Where a 20 mph zone leads into a 20 mph limit, it is important to use the correct signing to indicate this. It is not appropriate to use the sign that indicates the end of a 20 mph zone and the start of a different, higher speed limit. Instead, a standard 20 mph terminal sign (TSRGD 2002, diagram 670) must be used.

20 mph speed limits

95. Research into signed-only 20 mph speed limits shows that they generally lead to only small reductions in traffic speeds. Signed-only 20 mph speed limits are therefore most appropriate for areas where vehicle speeds are already low. This may, for example, be on roads that are very narrow, through engineering or on-road car parking. If the mean speed is already at or below 24 mph on a road, introducing a 20 mph speed limit through signing alone is likely to lead to general compliance with the new speed limit.
96. 20 mph limits covering most streets in Portsmouth have demonstrated that it is possible to introduce large-scale 20 mph limits in some built-up environments. Traffic speeds in most of the streets treated were relatively low (less than 20 mph) to start with. The early evidence suggests that it is likely that some speed and casualty reductions have taken place and this is consistent with previous research that has indicated that 20 mph limits without traffic calming reduce mean speeds by about 1 mph on average. A minority of streets in Portsmouth had average speeds of 25 mph or higher before the 20 mph speed limits were introduced and here the reductions in average speed tended to be greater, but insufficient to make the resulting speeds generally compliant with the new 20 mph limits. City-wide schemes may also contribute to changing travel and driving behaviour

positively in the longer run, and the objectives of the Portsmouth speed limits spread well beyond improving road safety. Schemes need to aim for compliance with the new speed limit.

97. The implementation of 20 mph limits over a larger number of roads, which the previous Speed Limit Circular (01/2006) advised against, should be considered where mean speeds at or below 24 mph are already achieved over a number of roads. Traffic authorities are already free to use additional measures in 20 mph limits to achieve compliance, such as some traffic calming measures and vehicle activated signs, or safety cameras. Average speed cameras may provide a useful tool for enforcing compliance with urban speed limits.
98. A 20 mph speed limit is indicated by terminal speed limit signs, and amendments to TSRGD (January 2012) require at least one speed limit repeater sign to be placed. Traffic authorities should ensure sufficient repeater signs are placed to inform road users of the speed limit in force. Chapter 3 of the Traffic Signs Manual provides guidance on the placing of repeater signs.
99. Every English authority has a traffic sign authorisation which permits them to place a 20mph speed roundel road marking as a repeater sign, without the requirement for an upright sign, to reduce unnecessary signing.
100. The amendments regulations to TSRGD (January 2012) have also provided thresholds below which speed repeater signs are no longer required by Direction 11 of TSRGD, but may still be placed if considered necessary. These thresholds are determined by carriageway length and the applicable speed limit.
101. Where traffic calming measures are placed, they should be signed in line with regulations (TSRGD 2002, diagram 557.1–4 and 883).

Variable 20 mph limits

102. Traffic authorities have powers to introduce 20 mph speed limits that apply only at certain times of day. These variable limits may be particularly relevant where for example a school is located on a road that is not suitable for a full-time 20 mph zone or limit, such as a major through road. To indicate these limits, variable message signs are available (TSRGD, Regulation 58). To reduce costs and sign clutter, the Department will consider authorising the placing of a single variable message sign on the approaching traffic lane (rather than signs on both sides of the road) on a case by case basis.
103. The Secretary of State has provided a special authorisation for every English traffic authority to place an advisory part-time 20mph limit sign, with flashing school warning lights. This can be a more cost-effective solution, where appropriate, and reduces the requirement for signing.

6.2 TRAFFIC CALMING MEASURES

104. Traffic calming involves the installation of specific physical measures to encourage lower traffic speeds. There are many measures available to traffic authorities to help reduce vehicle speeds and ensure compliance with the speed limit in force. These are required at regular intervals in 20 mph zones and may be used in 20 mph limits. As set out above, speed limit traffic signs and/or speed roundel markings can now also be used by traffic authorities in England.
105. The Highways (Road Humps) Regulations 1999, The Highways (Traffic Calming) Regulations 1999, and Direction 16 of TSRGD 2002 (as amended) give details of the traffic calming measures that meet the requirements for a 20 mph zone.
106. These calming measures range from more substantive engineering measures to lighter touch road surface treatments and include, for example:
- road humps;
 - road narrowing measures, including e.g. chicanes, pinch-points or overrun areas;
 - gateways;
 - road markings; and
 - rumble devices.
107. A recent review of 20 mph zone and limit implementation (Atkins, 2009) shows that the vast majority of traffic calming measures in use are speed humps, tables, cushions or rumble devices, so called vertical deflections, but traffic authorities will want to consider the full set of available measures.

6.3 40 MPH AND 50 MPH SPEED LIMITS

108. 30 mph is the standard speed limit for urban areas, but a 40 mph limit may be used where appropriate and, in exceptional circumstances, a 50 mph limit may be considered.
109. Roads suitable for 40 mph are generally higher-quality suburban roads or those on the outskirts of urban areas where there is little development. They should have good width and layout, parking and waiting restrictions in operation, and buildings set back from the road. These roads should, wherever possible, cater for the needs of non-motorised road users through segregation of road space, and have adequate footways and crossing places. Alternatively, traffic authorities should consider whether there are convenient alternative routes available.
110. In exceptional circumstances a 50 mph limit may also be used on higher-quality roads where there is little or no roadside development and

such speeds can be achieved safely. The roads most suited to these higher urban limits are special roads or those with segregated junctions and pedestrian facilities, such as primary distributors. They are usually dual carriageway ring or radial routes or bypasses that have become partially built up. Traffic authorities should, however, always assess the potential impact upon the local community and non-motorised road users before considering such a limit.

Table 1 Speed limits in urban areas – summary

Speed limit (mph)	Where limit should apply
20 (including 20 mph zone)	In streets that are primarily residential and in other town or city streets where pedestrian and cyclist movements are high, such as around schools, shops, markets, playgrounds and other areas, where motor vehicle movement is not the primary function.
30	In other built-up areas (where motor vehicle movement is deemed more important), with development on both sides of the road.
40	On higher quality suburban roads or those on the outskirts of urban areas where there is little development, with few cyclists, pedestrians or equestrians. On roads with good width and layout, parking and waiting restrictions in operation, and buildings set back from the road. On roads that, wherever possible, cater for the needs of non-motorised users through segregation of road space, and have adequate footways and crossing places.
50	On dual carriageway ring or radial routes or bypasses that have become partially built up, with little or no roadside development.

SECTION 7: RURAL SPEED MANAGEMENT

Key points

The national speed limit on the rural road network is 60 mph on single carriageway roads and 70 mph on dual carriageways.

Rural dual carriageways with segregated junctions and facilities for vulnerable road users would generally be suitable for 70 mph limits. However, a lower limit may be appropriate if, for example, a collision history indicates that this cannot be achieved safely.

In 2011, 66% of road deaths in Britain occurred on rural roads, and 51% of road deaths occurred on single rural carriageway roads subject to the National Speed Limit of 60 mph limit.

The speed limit on single carriageway rural roads should take into account the history of collisions, the road's function, existing mean traffic speed, use by vulnerable road users, the road's geometry and engineering, and the road environment including level of road-side development.

It is government policy that a 30 mph speed limit should be the norm in villages. It may also be appropriate to consider 20 mph zones and limits in built-up village streets.

It is recommended that the minimum length of a village speed limit should be 600 metres. However, traffic authorities may lower this to 400 metres, and in exceptional circumstances to 300 metres.

111. The vast majority of the rural road network is subject to the national speed limit of 60 mph on single carriageway roads, and 70 mph on dual carriageways. On many of these roads, the majority of drivers are travelling below – sometimes significantly below – the speed limit because of the characteristics of the roads. This is especially evident on the C and Unclassified roads where the geometric characteristics include many narrow roads, bends, junctions and accesses.
112. Rural roads account for 66% of all road deaths, and 82% of car occupant deaths in particular, but only around 42% of the distance travelled. Of all road deaths in Britain in 2011, 51% occurred on National Speed Limit rural single carriageway roads (DfT, 2011). The reduction in road casualties and especially deaths on rural roads is one of the key road safety challenges. Research has assessed the risk of death in collisions at various impact speeds for typical collision types on rural roads. This research suggests that the risk of a driver dying in a head on collision involving two cars travelling at 60 mph is around 90%, but that this drops

rapidly with speed, so that it is around 50% at 48 mph (Richards and Cuerden, 2009).

113. Inappropriate speed, at levels below the legal limit but above those appropriate for the road at the time (for example, because of the weather conditions or because vulnerable road users are present), is a particular problem for rural roads. *Exceeding the speed limit or travelling too fast for the conditions* are reported as contributory factors in 16% of collisions on rural roads. Specifically, inappropriate speed is recorded as a contributory factor in 20% of crashes on minor rural roads with a 60 mph limit.
114. Speed limit changes are therefore unlikely to fully address this problem and should therefore be considered only as one part of rural safety management. Where collision and casualty rates are high, traffic authorities should first seek to understand the particular types of crashes taking place and their causes, to allow them to choose effective solutions to reduce the risk.
115. To help in this process the *Accident Analysis on Rural Roads: A Technical Guide* (TRL, 2004) has been developed, which provides information on typical collision rates and typical proportions of different collision types on different types of rural road. This can be used to assess where there are above-average collision rates and provides help to traffic authorities in identifying the types of site or route specific intervention measures that might be appropriate to manage speeds and reduce collisions along the route.
116. Traffic authorities may wish to note the Road Safety Foundation's risk ratings for A roads in Britain. This rates the risk, based on frequency of death and serious injury in relation to amount of traffic on the particular road, into five categories ranging from low-risk, safe roads to high-risk roads.⁶
117. The Road Safety Foundation has assessed the safety of the trunk road network, assessing the protection levels that the design and engineering features of roadsides, medians and junctions on these roads offer in case of a crash. This assessment uses a star-based European Road Assessment Programme (EuroRAP) Road Protection Score, and has found that two-thirds of single carriageway trunk roads achieve only a 2-star (out of 4) rating. Even though this assessment has only been applied to trunk roads it suggests that engineering measures may often be more appropriate to manage speed and reduce collisions on rural single carriageway roads.
118. If high collision rates persist despite these measures, then lower speed limits may also be considered. Again, to achieve a change in motorists' behaviour and compliance with the limit, supporting physical measures, driver information and publicity or other measures are likely to be required.

⁶ Please see www.eurorap.org for detailed maps.

Such measures could include, for example, the use of vehicle-activated signs (VAS), which have proved particularly effective at the approaches to isolated hazards, junctions and bends in rural areas (Winnett and Wheeler, 2003). There should be no expectation on the police to provide additional enforcement to ensure compliance with a new limit beyond their routine activity, unless this has been explicitly agreed.

119. The aim of speed management actions is to deliver a balance between safety objectives for all road users and mobility objectives to ensure efficient travel, as well as environmental and community outcomes. So every effort should be made to achieve an appropriate balance between actual vehicle speeds, speed limits, road design and other measures. This balance may be delivered by introducing one or more speed management measures in conjunction with the new speed limits, and/or as part of an overall route safety strategy.

120. While routine enforcement should normally only be considered after other speed management measures have been considered, there may be occasions where the use of average speed cameras may offer a solution through calming traffic speed over a stretch of road. The Department has received a small sample of evaluation data of average speed cameras at non-roadworks sites from some local partnerships, and this data suggests a reduction in the percentage of motorists exceeding the speed limit from 55% before installation of cameras, to 18% afterwards, and an average reduction of killed and seriously injured casualties (KSI) per km of around 69%, and of personal injury collisions (PIC) of around 38%, (not adjusted for national trends and regression to mean effect).⁷

7.1 DUAL CARRIAGEWAY RURAL ROADS

121. Dual carriageway roads with segregated junctions and separate facilities for vulnerable road users are generally subject to and suitable for the National Speed Limit of 70 mph. However, a lower limit may be appropriate if, for example, a collision history indicates that this speed cannot be achieved safely and this risk of collisions cannot be addressed through other engineering measures.

7.2 SINGLE CARRIAGEWAY RURAL ROADS

122. In most instances, consideration of collision history, road function, mix of road users including presence of vulnerable road users, road geometry, engineering and environment, and actual traffic speed should enable traffic authorities to determine the appropriate limit on single carriageway rural roads.

⁷ Comprehensive before and after data were obtained for 11 permanent average speed camera sites on A roads with speed limits of 40, 50, 60, and 70 mph, where safety cameras were installed between 2000 and 2006, based on an informal data request. It should be noted that this is not a representative sample, has not been centrally and independently validated and should therefore only be seen as indicative of possible effects of average speed cameras.

123. Roads may have primarily either a through traffic function or a local access function. Both need to be provided safely. Mobility benefits will be more important for roads with a through-traffic function, while environmental and community benefits are likely to be of greater importance for the local access roads.
124. There may be many roads below A and B classification that serve a mixed through-traffic and access function. Where that traffic function is currently being achieved without a high collision rate, these roads should be judged as through-traffic roads. If, however, for all or parts of these roads there is a substantial potential risk to vulnerable road users, these sections should be assessed as roads with a local access function.
125. Within routes, separate assessments should be made for each section of road of 600 metres or more for which a separate speed limit might be considered appropriate. When this is completed, the final choice of appropriate speed limit for individual sections might need to be adjusted to provide consistency over the route as a whole.
126. The choice of speed limits should take account of whether there is substantial roadside development and whether the road forms part of a recognised route for vulnerable road users, including whether there is a footway.
127. Table 2 sets out recommended speed limits for roads with a predominant motor traffic flow function. If walking, cycling, horse riding, community or environmental factors are particularly important on any road section, consideration should be given to using the lower limit.

Table 2 Speed limits for single carriageway roads⁸ with a predominant motor traffic flow function

Speed limit (mph)	Where limit should apply:
60	Recommended for most high quality strategic A and B roads with few bends, junctions or accesses.
50	Should be considered for lower quality A and B roads that may have a relatively high number of bends, junctions or accesses. Can also be considered where mean speeds are below 50 mph, so lower limit does not interfere with traffic flow.
40	Should be considered where there are many bends, junctions or accesses, substantial development, a strong environmental or landscape reason, or where

⁸ For speed limits in villages, please refer to Section 7.3.

	there are considerable numbers of vulnerable road users.
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128. For C and Unclassified roads with important access and recreational function, the following speed limits are deemed appropriate and traffic authorities should use these as guidance when reviewing the speed limits on these roads:

- The national speed limit of 60 mph is only appropriate for the best quality C and Unclassified roads with a mixed (i.e. partial traffic flow) function with few bends, junctions or accesses. In the longer term, these roads should be assessed against through-traffic criteria. For lower quality C and Unclassified roads with a mixed function and high numbers of bends, junctions or accesses 50 mph may be appropriate.
- A speed limit of 40 mph may be considered for roads with a predominantly local, access or recreational function, for example in national parks or areas of outstanding natural beauty (AONB), or across, or adjacent to, unenclosed common land; or if they form part of a recommended route for vulnerable road users. It may also be appropriate if there is a particular collision problem.

129. It is important to note that the above does not imply that speed limits should automatically be reduced. Indeed, in some cases the assessment may suggest that the existing speed limit may be too low, and a higher speed limit should be considered, as it is likely to be achievable safely.

130. We would welcome applications for zonal rural speed limits, usually 40 mph zones, for example in national parks or AONBs or on other networks of minor rural roads where speeds are already in line with such a limit. Such zones would include entry treatment and painted repeater roundels. The Department is keen to consider the effectiveness of such zones in reducing speeds and signing requirements.

7.3 VILLAGES

131. Fear of traffic can affect people's quality of life in villages and it is self-evident that villages should have comparable speed limits to similar roads in urban areas. It is therefore government policy that a 30 mph speed limit should be the norm through villages.

132. It may also be appropriate to consider 20 mph limits or zones in built-up village streets which are primarily residential in nature, or where pedestrian and cyclist movements are high. Such limits should not, however, be considered on roads with a strategic function or where the movement of motor vehicles is the primary function.

133. Traffic Advisory Leaflet 01/04 (DfT, 2004) sets out policy on achieving lower speed limits in villages. It suggests that reasonable minimum criteria for the definition of what constitutes a village, for the purpose of applying a village speed limit of 30 mph, would be that there were:
- 20 or more houses (on one or both sides of the road); and
 - a minimum length of 600 metres.
134. If there are just fewer than 20 houses, traffic authorities should make extra allowance for any other key buildings, such as a church, shop or school. Where the character of a village falls outside this definition, local authorities are encouraged to use their discretion in deciding whether a lower speed limit is appropriate.
135. The criteria above should give adequate visual messages to drivers to reduce their speed. It is recommended that the minimum length for the new limit is at least 600 metres to avoid too many changes in speed limits along a route, and to aid compliance. Traffic authorities may, however, lower this to 400 metres when the level of development density over this shorter length exceeds the 20 or more houses criterion and, in exceptional circumstances, to 300 metres.
136. In some circumstances it might be appropriate to consider an intermediate speed limit of 40 mph prior to the 30 mph terminal speed limit signs at the entrance to a village, in particular where there are outlying houses beyond the village boundary or roads with high approach speeds. For the latter, traffic authorities might also need to consider other speed management measures to support the message of the speed limit and help encourage compliance so that no enforcement difficulties are created for the local police force. Where appropriate, such measures might include a vehicle-activated sign, centre hatching or other measures that would have the effect of narrowing or changing the nature and appearance of the road.
137. Where the speed limit commences at the village boundary, the village nameplate sign (prescribed in diagram 2402.1 of TSRGD 2002) and speed limit roundel may be mounted together. The combined sign should be located at the point where the speed limit starts, and it may be helpful if drivers can see housing at the same time as the signs, reinforcing the visual message for reduced speed.
138. If there are high approach speeds to a village, or the start of the village is not obvious, village gateway treatments can also be an effective way to slow drivers down. Advice can be found in Local Transport Note 1/07 Traffic Calming (DfT, 2007) and Traffic Advisory Leaflets 01/94 *VISP – A Summary* (DoT, 1994a) and 01/04 *Village Speed Limits* (DfT, 2004).
139. In situations where the above criteria for a village are not met and there is a lesser degree of development, or where engineering measures are not practicable or cost-effective to achieve a 30 mph limit, but a

reduction from the national 60 mph speed limit is considered appropriate, traffic authorities should consider alternative lower limits of 40 or 50 mph.

140. A recommendation to use the framework for the assessment of speed limit options on rural single carriageway roads, in place since the publication of the previous Speed Limit Circular (01/2006), is withdrawn.

SECTION 8: REFERENCES/BIBLIOGRAPHY

Legislation

Highways Act 1980. London: HMSO

Road Traffic Act 1988. London: TSO

Road Traffic Regulation Act 1984. London: HMSO

Statutory Instrument 2002 No. 3113, *The Traffic Signs Regulations and General Directions 2002*. TSO: London

Statutory Instrument 1999 No. 1608, *The Road Traffic Regulation Act 1984 (Amendment) Order 1999*. London: TSO. (This relates to 20 mph speed limits.)

Statutory Instrument 1999 No. 1026, *The Highways (Traffic Calming) Regulations 1999*. London: TSO

Statutory Instrument 1999 No. 1025, *The Highways (Road Humps) Regulations 1999*. London: TSO

Statutory Instrument 1996, No. 2489, *The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996*. London: TSO

Transport Act 2000. London: TSO

Circulars

Department for Transport (2003), Circular 02/03, *The Traffic Signs Regulations and General Directions 2002*. London: TSO

Traffic Advisory Leaflets

Department for Transport (2002), Traffic Advisory Leaflet 8/02. *Home Zones – Public Participation*. London: DfT

Department for Transport (2003), Traffic Advisory Leaflet 1/03. *Vehicle Activated Signs*. London: DfT

Department for Transport (2004a), Traffic Advisory Leaflet 1/04, *Village Speed Limits*. London: DfT

Department for Transport (2004b), Traffic Advisory Leaflet 3/04. *Quiet Lanes*. London: DfT

Department for Transport (2005a), Traffic Advisory Leaflet 1/05. *Rumblewave Surfacing*. London: DfT

Department for Transport (2005b), Traffic Advisory Leaflet 2/05. *Traffic Calming Bibliography*. London: DfT

Department for Transport (2006), Traffic Advisory Leaflet 2/06. *Speed Assessment Framework: Balancing safety and mobility objectives on rural single carriageway roads*. London: DfT

Department of the Environment, Transport and the Regions (1997), Traffic Advisory Leaflet 12/97. *Chicane Schemes*. London: DETR

Department of the Environment, Transport and the Regions (1998), Traffic Advisory Leaflet 1/98. *Speed Cushion Schemes*. London: DETR

Department of the Environment, Transport and the Regions (1999a), Traffic Advisory Leaflet 09/99, *20 mph Speed Limits and Zones*. London: DETR

Department of the Environment, Transport and the Regions (1999b), Traffic Advisory Leaflet 14/99. *Traffic Calming on Major Roads: A Traffic Calming Scheme at Costessey, Norfolk*. London: DETR

Department of the Environment, Transport and the Regions (2000), Traffic Advisory Leaflet 1/00, *Traffic Calming in Villages on Major Roads*. London: DETR

Department of the Environment, Transport and the Regions (2001a), Traffic Advisory Leaflet 5/01, *Traffic Calming Bibliography*. London: DETR

Department of the Environment, Transport and the Regions (2001b), Traffic Advisory Leaflet 10/01, *Home Zones – Planning and Design*. London: DETR

Department of Transport (1990), Traffic Advisory Leaflet 3/90. *Urban Safety Management Guidelines from IHT*. London: DoT

Department of Transport (1993a), Traffic Advisory Leaflet 3/93, *Traffic Calming Special Authorisation*. London: DoT

Department of Transport (1993b), Traffic Advisory Leaflet 11/93, *Rumble Devices*. London: DoT

Department of Transport (1993c), Traffic Advisory Leaflet 12/93, *Overrun Areas*. London: DoT

Department of Transport (1993d), Traffic Advisory Leaflet 13/93. *Gateways*. London: DoT

Department of Transport (1994a), Traffic Advisory Leaflet 1/94, *VISP – A Summary*. London: DoT

Department of Transport (1994b), Traffic Advisory Leaflet 2/94, *Entry Treatments*. London: DoT

Department of Transport (1995a), Traffic Advisory Leaflet 1/95. *Speed Limit Signs: A Guide to Good Practice*. London: DoT

Department of Transport (1995b), Traffic Advisory Leaflet 7/95. *Traffic Islands for Speed Control*. London: DoT

Department of Transport (1996a), Traffic Advisory Leaflet 2/96. *75 mm High Road Humps*. London: DoT

Department of Transport (1996b), Traffic Advisory Leaflet 7/96. *Highways (Road Humps) Regulations 1996*. London: DoT

Department of Transport (1997), Traffic Advisory Leaflet 2/97, *Traffic Calming on Major Roads: A49, Craven Arms, Shropshire*. London: DoT

Policy, research and other documents

Atkins (2009), *Interim Evaluation of the Implementation of 20 mph Speed Limits in Portsmouth – Summary Report*.

Department for Transport (2005), *Home Zones: Challenging the Future of Our Streets*. London: DfT

Department for Transport (2007), Local Transport Note 1/07, *Traffic Calming*. London: TSO

Department for Transport (2008), Traffic Signs Manual, Chapter 3, *Regulatory Signs* and Chapter 4, *Warning Signs*. London: TSO

Department for Transport (2011), *Strategic Framework for Road Safety*. London: DfT

Department for Transport (2012), *Reported Road Casualties Great Britain 2011: Annual Report*. London: <http://www.dft.gov.uk/statistics/releases/road-accidents-and-safety-annual-report-2011/>

Department for Transport, Local Government and the Regions (2001), *A Road Safety Good Practice Guide*. London: DTLR

Department of the Environment, Transport and the Regions (2000a), *New Directions in Speed Management: A Review of Policy*. London: DETR

Department of the Environment, Transport and the Regions (2000b), *Tomorrow's Roads – Safer for Everyone. The Government's Road Safety Strategy and Casualty Reduction Targets for 2010*. London: DETR

Finch, D. J., Kompfer, P., Lockwood, C. R. and Maycock, G. (1994), Project Report 58, *Speed, Speed Limits and Accidents*, Crowthorne: TRL

Grundy C, Steinbach R, Edwards P, Wilkinson P and Green J. (2008) *20 mph Zones and Road Safety in London: A report to the London Road Safety Unit*. London: London School of Hygiene and Tropical Medicine

Grundy, C., et al. (2009) *Effect of 20 mph traffic speed zones on road injuries in London, 1986–2006: controlled interrupted time series analysis*. British Medical Journal 339: b4469

Highways Agency (2002), TR 2136 Issue C, *Functional Specification for the Optical Performance of Discontinuous Variable Message Signs*. Bedford: HA

Highways Agency (2004), Document TA 87/04, *Design Manual for Roads and Bridges Trunk Road Traffic Calming*. Bedford: HA

Institute of Incorporated Highway Engineers (2002), *Home Zone Design Guidelines*. London: IHIE

Institution of Highways and Transportation (1997), *Transport in the Urban Environment*. London: IHT

Institution of Highways and Transportation (1999) *Rural Safety Management Guidelines*. London: IHT

Institution of Highways and Transportation (2003) *Urban Safety Management Guidelines*. London: CIHT

Kirkby, T (2002), *Memorandum by Kingston upon Hull City Council (RTS 152) – 20 mph zones in Kingston upon Hull*, Select Committee on Transport, Local Government and the Regions, [Appendices to the Minutes of Evidence](#).

Lynam, D., Hill and J., Barker, J. (2004) Published Project Report 025 – *Developing a Speed Management Assessment Framework for Rural Single Carriageway Roads*. Crowthorne: TRL

Mackie, A. (1998) TRL Report 363 – *Urban Speed Management Methods*, Crowthorne: TRL

Richards, D. and Cuerden, R. (2009), Road Safety Web Publication 9, *The Relationship between Speed and Car Driver Injury Severity*, Transport Research Laboratory, London: DfT

Road Safety Foundation (2009), RSF Report 1/09 - *Eurorap 2009 Results, Measuring and mapping the Safety of Britain's Motorways and A Roads*, Basingstoke: Road Safety Foundation

Road Safety Foundation (2010), RSF Report 1/10 - *Protect and Survive – Star Rating England’s Trunk Road Network for Safety*, Basingstoke: Road Safety Foundation

Rosén, E. and Sander, U. (2009), Pedestrian fatality risk as a function of car impact speed. *Accident Analysis and Prevention* Volume 41, Issue 3, Amsterdam: Elsevier

Stradling, S., Broughton, P., Kinnear, N., O’Dolan, C., Fuller, R., Gormley, M. and Hannigan, B. (2008), Understanding Inappropriate High Speed: A Quantitative Analysis. *Road Safety Research Report* No. 93, London: DfT

Taylor, M. C., Baruya, A., Kennedy, J. V. (2002). TRL Report 511 – *The Relationship Between Speed and Accidents on Rural Single Carriageway Roads*. Crowthorne: TRL

Taylor, M. C., Lynam, D. A. and Baruya, A. (2000), TRL Report 421 – *The Effects of Drivers’ Speed on the Frequency of Road Accidents*. Crowthorne: TRL

Transport Research Laboratory (2004), Published Project Report 025 – *Accident Analysis on Rural Roads: A Technical Guide*. Crowthorne: TRL

Webster, D. C. and Mackie, A. M (1996) TRL Project Report 215 – *Review of Traffic Calming Schemes in 20 mph Zones*. Crowthorne: TRL

Winnett, M.A. and Wheeler A.H. (2003). *Vehicle-activated signs – a large scale evaluation*. TRL Report TRL548. Crowthorne: TRL

APPENDIX A: KEY PIECES OF SPEED LIMIT, SIGNING AND RELATED LEGISLATION AND REGULATIONS

1. Key speed limit and safety camera signs diagrams in Traffic Signs Regulations and General Directions, (TSRGD) 2002, as amended, include:
 - diagram 670 – 'Maximum speed limit' sign
 - diagram 671 – 'National speed limits apply'
 - diagrams 672 and 673 – Start and end of minimum speed limits respectively.
 - diagrams 674 and 675 – Entrance and end of 20 mph 'Speed limit zone' signs respectively.
 - diagrams 878, 879 and 880 – 'Camera warning' signs
 - diagram 1065 – Carriageway roundel road marking
 - diagram 2402.1 and 2403.1 – Town or village gateway sign (boundary sign) (may be combined on the same post or backing board with a speed limit sign)
 - diagram 7032 – Temporary 'New 30 mph speed limit' sign
2. The main directions for the use and placing of speed limit restrictions in TSRDG 2002, as amended, are:
 - directions 8 and 9 – Beginning of speed limit restrictions
 - direction 10 – Ending of speed limit restrictions
 - direction 11 – Placement of speed limit repeater signs
 - direction 16 – Speed limits of 20 mph
 - directions 41 and 42 – Mounting and backing of signs.
3. Further detailed advice on the form and siting of speed limit signs is given in Chapter 3 of the Traffic Signs Manual (DfT, 2008).

Speed Limit Orders

4. Part VI of the Road Traffic Regulation Act (RTRA) 1984 deals specifically with speed limits and sections 81-84 deal with different speed limits and the speed limit order-making process. The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 sets out the process of making traffic orders, which includes speed limit orders. Traffic authorities will need to refer to these Regulations in full. They set out the persons and organisations to be consulted before traffic orders are made, and an extract is below.

“Consultation

6.—(1) An order making authority shall, before making an order in a case specified in column (2) of an item in the table below, consult the persons specified in column (3) of the item.

TABLE

(1) <i>Item</i>	(2) <i>Case</i>	(3) <i>Consultee</i>
1.	Where the order relates to, or appears to the order making authority to be likely to affect traffic on, a road for which another authority is the highway authority or the traffic authority	The other authority
2.	Where the order relates to, or appears to the order making authority to be likely to affect traffic on, a Crown road	The appropriate Crown authority
3.	Where the order relates to, or appears to the order making authority to be likely to affect traffic on, a road subject to a concession	The concessionaire
4.	Where the order relates to, or appears to the order making authority to be likely to affect traffic on, a road on which a tramcar or trolley vehicle service is provided	The operator of the service
5.	Where the order relates to, or appears to the order making authority to be likely to affect traffic on,- (a) a road outside Greater London which is included in the route of a local service; or (b) a road in Greater London which is included in the route of a London bus service	In case (a) the operator of the service In case (b) the operator of the service and Transport for London
6.	Where it appears to the authority that the order is likely to affect the passage on any road of- (a) ambulances; or (b) fire-fighting vehicles	In case (a) the chief officer of the appropriate NHS trust or NHS Foundation Trust In case (b) the fire and rescue authority
7.	All cases	(a) The Freight Transport Association (b) The Road Haulage Association (c) Such other organisations (if any) representing persons likely to be affected by any provision in the order as the order

making authority thinks
it appropriate to consult”

5. The regulations also set out the requirements for publication of the proposal before making an order through a notice and further adequate publicity.
6. The Road Traffic Regulation Act 1984 Schedule 9 Part III s 20 contains a requirement also to consult the Chief Officer of Police.

Consultation for traffic calming measures

7. Full consultation must take place before any traffic calming measures are installed. For road humps, the process is outlined in The Highways (Road Humps) Regulations 1999 (SI 1999 No. 1025) as follows (Regulation 3):

"Where the Secretary of State or a local traffic authority proposes to construct a road hump, he or they shall, as well as consulting the chief officer of police as required by section 90C(1) of the Act, also consult -

- (a) where the proposal is by the local traffic authority in England which is the council of a County, any district council in whose district the highway is situated;
- (b) in all cases, the chief officer of the fire brigade for the area in which the highway concerned is situated and the chief officer of any body providing ambulance services under the National Health Service Act 1977(a) and operating in that area;
- (c) in all cases, organisations appearing to him or them to represent persons who use the highway to which the proposal related, or to represent persons who are otherwise likely to be affected by the road hump."

"The Act" refers to the Highways Act 1980.

8. For all other traffic calming, the consultation process is outlined in The Highways (Traffic Calming) Regulations 1999 as follows (Regulation 4):

"Where a traffic authority proposes to construct a traffic calming work in a highway they shall –

- (a) consult the chief officer of police for the area in which the highway is situated; and
- (b) consult such persons or organisations representing persons who use the highway or who are otherwise likely to be affected by the traffic calming work as the traffic authority thinks fit."

9. Although there is no requirement to consult all the emergency services for traffic calming measures other than road humps, it is strongly recommended that both the ambulance service and the Fire and Rescue Service are included in any consultation for all traffic calming as a matter of course.