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**Stoneleigh Close Residents
Association
Objection to inclusion of
Croslands Park Ref SHL068
in Local Plan for housing
development
Transport Statement
September 2016**



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Executive summary

CTS Traffic and Transportation were appointed by Stoneleigh Close Residents Association to provide a Transport Statement regarding the proposed inclusion of fields to the rear of Croslands Park, ref SHL068, within Table 6 of the proposed Local Plan publication documents of Barrow Borough Council, produced in July 2016 and currently open for consultation and critique.

This review demonstrates that from a traffic and transport point of view the proposed inclusion of this site, and assumed access from Stoneleigh Close, is a non-starter due to the significant highway safety and capacity issues the additional traffic would create. It is proposed the site should be referenced that access via Stoneleigh Close is impossible and that unless alternative access could be found, the site should be removed from Table 6 completely. This would be the case even with any number of extra homes – however small - due to the current conditions pertaining which cannot stand any worsening whatsoever.

1. Introduction

Stoneleigh Close Residents Association (SCRA) object to the inclusion of the fields to the rear of Croslands Park, ref SHL068, in Table 6 of the present preferred Barrow Borough Local Plan Preferred Options Publication Draft July 2016 document as a location for development of 28 dwellings taking access from an extension of Stoneleigh Close. This Report was requested by SCRA from CTS Traffic and Transportation Ltd in support of their objection. It is noted that the earlier listing of 63 dwellings is now reduced to 28. It is not known why this value was reduced at this present time. Further, the now published modelling report of May 2016 suggests total expected generations from this development would be 31, not 33 as we have suggested below.

Study timetable

Data for the study was drawn together during June 2016 including the latest status of the Local Plan and updated when the Publication Draft and Modelling Report of May 2016 were made public.

Report structure

This Report provides the following further chapters:

- Chapter 2 – background to objection
- Chapter 3 – expected impact and conclusions.

2. Site Location and background

Site Location

The fields to the rear of Crosland Park, Local Plan reference SHL068 lie to the north and east of the centre of Barrow-in-Furness. It lies south of Croslands Park Road, with no current practical highway access from that route (which leads between Abbey Road and Rating Lane, two key traffic routes in the area). It lies east of land including the Furness Rugby Union Football Club and west of Rating Lane. The proposal is believed to allow some 28 dwellings, (reduced from an initial 63) with suggested access via an extension of Stoneleigh Close.

The site is supported in the present version of the Local Plan as being a vacant, greenfield site within single, public ownership. It is noted as presently being an area of urban amenity space and within the current existing urban boundary.

A desktop study was undertaken in June 2015 reviewing all listed proposed housing sites. The comments regarding SHL068 from Cumbria County Council are:

“Non Starter – Access from Crosland Park is unattainable due to the development site having no highway frontage. There is a very limited highway frontage provided from Stoneleigh Close but this is considered insufficient to accommodate an additional 54 (sic) dwellings through a residential cul-de-sac and onto an already busy Rating Lane”.

For the sake of clarity, the current listing suggests there would be 28 dwellings, showing a gradual reduction in the expected capacity from 63 to 54 and now 28.

Rating Lane presently is a very busy access route to both the Barrow-in-Furness Sixth Form College as well as the St Bernards Catholic High School. One lies to the north of Crosland Park Road and the other to the south. There is also the Chetwynde School on the opposite side of Rating Lane. Shopping facilities are provided at the junction of Rating Lane and Flass Lane / Harrel Lane to the south. At this junction there is a further local primary school which currently has 460 pupils. Many of these are dropped off and picked up in the vicinity of this junction, most using the zebra crossing to the south of the roundabout, which further impedes traffic flow there.

The section of Rating Lane north of Stoneleigh Close is currently a 20mph traffic zone, traffic calmed and with extensive parking restrictions to seek to keep the route open for traffic during the busy peaks when people are accessing various destinations including those coming to the schools in the area.

On 14th June 2016, a development of 44 homes was approved on the Meadowlands Avenue site to the south of Stoneleigh Close off Rating Lane. This was felt to be a 'small' development below the threshold for a Transport Assessment, although one was produced in November 2015 in support of that application. Information from this is presented below as part of the current background traffic detail. During preparation of this report, CTS sought access to the modelling information backing the Local Plan publication document, but no further information was provided until this Modelling Report of May 2016 was made publicly available in August 2016.

Stoneleigh Close currently contains 12 four bedroom detached houses and four three bedroom bungalows. All have two parking spaces each. It is understood that this development was built by Kilroe Homes, a company no longer trading, in the late 1980's and very early 1990's to the current standards of that time.

At the junction with Rating Lane, carriageway width of the Close is 5.08m. After this, width of 5m is maintained throughout. The road comprises two almost right angled turns before the final section which terminates in a turning head on the boundary with Crosland Park. The pavement is located only on the right hand side of the Close as you enter, and is 1.34m wide throughout. There is no hard strip on the side of the road without the pavement beyond the kerbing, and in many cases the houses are relatively close to the road.

There is no other parking provided except at kerbside, which presently can cause issues due to the relatively narrow overall carriageway width. This is worsened by there only being space for a relatively narrow footway on the right hand side of the Close. If people park when visiting residents, they often block this pavement meaning walkers have to cross into the road to continue along the Close. At present, although significant, this problem is reduced by the few further houses that exist in the Close.

We were advised by residents that the Close entrance from Rating Lane is effectively a blind corner leading to another blind corner. Forward visibility from the junction onwards along the Close is 28m, but for those leaving the Close this reduces to 16m.

The first three houses have driveways very close to the junction with Rating Lane. We are told that residents have to cross to the right hand lane on the blind corner to get on to their drives. Reversing off driveways requires them to straddle both lanes leaving them vulnerable to traffic entering and leaving the Close with the limited forward visibility. We were advised by residents of numerous incidents of both sharp braking and also vehicles mounting the pavement to avoid hitting other vehicles. In summary, reversing off drives is hazardous for the first six houses.

Further, any traffic not used to the geometry of the Close ends up cutting the white line on the blind bend, often leading to cars and vans ending up facing one another head on.

The first bend is followed by a second tight left hand, rising bend, giving issues even of access to the next two houses. One resident from these two houses told us they find it very hard to turn on to their drive, particularly due to the speed of other traffic, more specifically visiting delivery vehicles leaving the Close. They describe the very poor visibility travelling from Rating Lane, leading to a very dangerous situation for these two houses at all times. "This is worsened on days with low sun as on such days as you turn this corner you are totally unsighted" they told us.

Forward visibility at the entrance to the close heading into the Close is 28m. At the first bend, this reduces to 20m. In the outbound direction, forward visibility is 16m at the final bend and 28m at the junction with Rating Lane.

The recent TA for the approved Meadowlands site identified that the recent accident record was such that they concluded "the area has no significant accident record that would prevent (Meadowlands) from coming forward" although it also accepts that the recent calming measures, which we are advised arose from accident issues in the past, had been introduced and they believed may have reduced accidents, though there is no formal acceptance of this and residents suggest near misses still regularly occur purely due to the severe traffic pressures experienced.

The TA shows the focus of these accidents being along Rating Lane, and although all are slight accidents they are still occurring despite the traffic calming measures introduced. This seems to be a result of the reduction of speed achieved by the calming, although as noted accidents do remain.

Rating Lane is lined by trees on either side. These have an impact on the visibility for people driving in or out of the Close. The current nature of traffic in the area is such that the Council have introduced double yellow lines on the eastern side immediately north of Stoneleigh Close, with a parking area on the western side having a School Day parking allowance, giving people up to 30 minutes parking between 08:00 and 09:00 and again from 15:00 to 17:00 with no return allowed within the hour. This parking area, for around 15 vehicles, ends at a Bus Stop (which currently has no service). After this, the 20mph zone begins including double yellow lines on both sides of the road. A similar parking zone is provided on the eastern side of Rating Lane north of the St Bernards School Entrance together with cycle lanes immediately around this entrance.

We were advised by Stoneleigh Close residents that drop-off and more significantly pick-up parking for the School occurs and causes issues in the Close particularly in Winter months when more parents tend to collect their children by car. This results in a high volume of pedestrians, including vulnerable young students, crossing the end of the Close and mingling with the parked cars in the junction to cross over to the school.

Residents also told us that traffic at the school opening and closing times is often stationary in this locality, leading to frustration and dangerous movements whilst the level of pedestrians remains very high.

Background Traffic

Although there is a strategic traffic model for Barrow-in-Furness being used to support the Local Plan development, we were advised that this was not sufficiently detailed to evaluate specific proposals. Since this comment was provided, the publication of the Transport Modelling Report of May 2016 has provided the expected generations from this site. Given the conclusion of the Meadowlands development that it would not produce sufficient traffic to justify a full assessment, no traffic impacts over the wider area were produced, although it was confirmed that some 14 two way trips would be added onto Rating Lane by that development in each peak.

A peak hours turning count was undertaken at the Stoneleigh Close / Rating Lane junction on Thursday 16th June, 2016, covering the three peak morning hours from 07:00 to 10:00 and 15:00 to 18:00 for the evening. The local schools were considered to be operating normally. Eight categories of traffic were counted in 15 minute periods. These included cars, lgv, ogv1, ogv2, psv, pedestrians, pedal and motor cycles separately.

The overall peak hour for traffic at this location was 08:00 to 09:00, with the peak movement being northbound through on Rating Lane. This flow was 494 of which 79 were pedestrian movements. As is usual, particularly where there are school movements, the afternoon peak was lower and spread almost equally over the 15:00 to 16:00 and 16:00 to 17:00 hours, with the largest movement being 340 southbound on Rating Lane. The corresponding peak pedestrian flow (65) was southbound on Rating Lane in the earlier of the two hours. These flows suggest a junction taking both normal commuter traffic but accentuated by the school traffic. The level of the peak is very marked in the morning.

These flows are those which would most oppose any traffic leaving Stoneleigh Close. The situation is worsened by the high volumes of crossing pedestrian traffic, further reducing opportunity for Stoneleigh Close residents to enter the junction. Once they do enter the junction, they also have a high expectation of joining the back of a standing queue of traffic generated by the school entrance not far north.

Traffic flows from Stoneleigh Close were a total of 30 departures in the morning and 14 in the evening, with 13 returning in the am peak period and 22 in the evening. Peak departures of 16 vehicles corresponded with the traffic peak of 08:00 to 09:00 making the traffic situation here more severe. The split of trips departing from the Close was half northbound and half southbound, similar to that identified by the Meadowlands traffic information.

The count only identified six pedestrian movements from the Close onto the Rating Lane route during the six hours counted. In the same period there were no pedal or motor cycle movements observed. This suggests that the current Close is very heavily dependent on car journeys for residents travelling at least in the peak hours, with very little if any use of sustainable travel. With no bus stop in the Close this includes use of public transport as anyone wishing to travel by public transport would first be identified walking to a bus stop.

An automatic traffic count was undertaken to the south of Stoneleigh Close on Rating Lane covering the full days of Thursday 16th June to Wednesday 22nd June, providing a full seven day analysis of traffic flows for all hours during that period.

Firstly, a validation was undertaken to compare the manual count with the ATC for the equivalent hours. When the pedestrian movements were removed, the resulting ATC and manual counts by direction provided a very close match and confirming the pattern of traffic through these hours as discussed above.

The ATC confirms that the daytime peak is 08:00 to 09:00 northbound, with an average of some 394 vehicles heading into the Stoneleigh Close junction from the south at this time. This is around 7 vehicles per minute on average. The average weekday daily equivalent northbound flow is about half of this, at 194 vehicles. This confirms the high peak traffic related to the schools. The average southbound flow at this time is also high, at 348 vehicles, around 68% more than the typical weekday southbound flow of 207 vehicles.

Whilst as is typical the afternoon / evening peaks are lower, the peak hour northbound is 15:00 to 16:00 with 253 vehicles on average on a weekday, with the southbound peak varying from 15:00 to 16:00 to 16:00 to 17:00, slightly higher at 324 vehicles.

Overall this confirms that the Rating Lane traffic flow is very peaked and is dominated by the school movements rather than commuter movements. This implies the pedestrian school traffic is at high risk from any attempts to cross this traffic flow, which must occur since the principal parking for people dropping their children for the Catholic school is on the Stoneleigh Close side of the road, with double yellow lines south of the school entrance on this section (although there is some parking allowed north of the school entrance on the same side of the road).

These levels of flow would also make exit from Stoneleigh Close difficult for people heading to work, or to more distant schools, making adding any further traffic likely to exacerbate access issues further.

We are further advised that the special school buses which have to be provided due to the lack of public bus services on the route, and the need to service up to 2,000 pupils, mean that such buses often end up parked on Rating Lane for periods up to 30 minutes, further slowing traffic flow at peak times, and creating even further occasion for standing traffic on the section of Rating Lane most susceptible to traffic having rear end shunts. The possibility of children crossing from behind the buses is also heightened by this situation which further increases accident potential. It is not clear why these vehicles have to wait on the road, presumably due to capacity and safety issues within the Catholic school entrance area.

Residents also advised us that their experience was that traffic flow levels and issues were higher and worse in winter months when cold, wet, windy weather and darkness led to more people tending to bring their children to school and more people using Rating Lane by car, particularly compared to the June date when the traffic counts were undertaken. Even with the situation in June residents felt that emergency vehicles would find travel along Rating Lane very tortuous in the peak hours. Residents reiterated that "we much prefer to leave or return home away from peak times and try to plan our days around avoiding these times", and that "we have often come face to face with other cars on both blind bends and regularly have to slam on our brakes".

Nearby Facilities

As already noted there are three schools in the near vicinity as well as a small shopping area to the south at the junction of Rating Lane and Flass Lane, although travel to the latter would more likely be by motorised transport due to the distances involved. Rating Lane does not currently have any bus service and the only public transport available is also located near to that junction, which would again tend to discourage public transport usage from the current Close, or from any new development.

The traffic count observations suggest that all movements from the current Close residences are by private car apart from a very small number of pedestrian movements and an even smaller number of pedal and motorcycle movements. This confirms that any new development would be at the less sustainable end of any transport strategy, and generally highly dominated by private car trips.

Transport and planning policy background

As a result of the Planning and Compulsory Purchase Act 2004, the old development plan system made up of a County Structure Plan and Borough-wide Local Plan, has been replaced by a Regional Spatial Strategy and Local Development Framework. The old documents were 'saved' and are being gradually replaced by new documents. At the present time, the saved Local Plan is that adopted 24 August 2001 with the Housing Chapter Alteration 2006, adopted 2 June 2006.

The National Planning Policy Framework (NPPF) of March 2012 and the Localism Act 2011 amended the requirement for local planning authorities such that they now are required to produce a Local Plan rather than a Local Development Framework. For Barrow-in-Furness current documents are summarised in the interactive version of the Adopted Proposals Map. The timetable for development of the new documents is outlined in the Local Development Scheme document of February 2014. It confirms the Borough are preparing a single Local Plan document.

At this time, the Publication Draft of the Local Plan is now in the public domain together with the supporting documents, which we have now used to modify our initial report which was prepared on the documents available at the time of our appointment.

The Local Plan is supported by highways modelling and a transport improvement study by Cumbria County Council Highways plus a viability study from a private consultancy. Cumbria Highways confirmed that these documents are the property of Barrow Borough Council and that only BBC can provide access to them. They also confirmed that the studies undertaken are strategic and not local or detailed, based on requirements laid out in the Transport Evidence Bases in Plan Making document (see below). During our initial work, no further detail was given, and we have just taken access to the documents made public including the Transport Modelling Report dated May 2016.

After submitting a letter explaining our intent to object on behalf of SCRA, we were pointed to the current version of the Local Plan Preferred Options Consultation Draft of June 2015, and have amended this Report to concur with the present state of the proposals for SHL068. We note that the Plan suggests a minimum of 1,206 homes are needed in the principal centre of Barrow, and that Table 6 lists some 1,357 available. SHL068 is around 2% of this total given its now reduced level of 28 homes suggested.

In terms of guidance regarding impacts of developments on transport and traffic, two documents provide key advice. Guidance on Transport Assessment (GTA) was produced in March 2007 by the Dft. It has recently been replaced by the on-line document "Transport Evidence Bases in Plan Making" (TEBiPM) (more focussed on Local Plan reviews, but emphasising the principles of GTA). Guidance on highway design is provided in the Manual for Streets (MfS) document more recently supplemented by MfS2.

Two other documents remain available for guiding development impacts in Cumbria. The Cumbria Design Guide Volume 1 "Layout of New Residential Developments (1st edition December 1996)" and the "Highway Authority Input to Development Control Code of Practice" of September 2006 appear to remain the guidance valid for the Borough, seen in the context of the TEBiPM.

In terms of the proposed development, GTA recommends a Transport Assessment for any development in excess of 50 houses, or where there is expected additional vehicular trips of over 30 two-way in the peak hours per day.

The Cumbria Design Guide suggests that any development of up to 100 dwellings would need a minor access road. The following are expected of this:

- Target maximum speed 20 or 30 mph
- Carriageway width for first 15m and generally otherwise of 5.5m
- Minimum centreline radius of 15m
- Max vertical alignment gradient of 1 in 10 and 1 in 20 at junctions
- Minimum of 40m forward visibility extended to 60m if carriageway is less than 4.8m wide
- Minimum junction spacing of 40m on same side, 20m if on opposite sides
- Junction visibility 4.5m by 33m
- Kerb radius 6m
- Footway width 1.8m usually on both sides
- Verge width 0.5m surfaced margin for vehicle overhang
- Direct accesses not within 15m of road junction, visibility splay at rear 2.4m by 2.4m
- Minimum of 60m distances between required speed restraints
- Turning space for refuse vehicles
- Road lighting standard BS5489 Part 3 Category 3/2; 6 lux average, 2.5 lux minimum

The Development Control Code of Practice encourages pre-application discussions on transport assessments for those of the size of the proposal. It needs to consider split of journeys by mode and measures proposed to reduce use of less sustainable transport modes. Any analysis must be robust and must allow the Councils to ensure the local transport network is adequate to cope with the new demands in terms of road safety, walking, cycling, public transport and car traffic.

3. Proposed development, sustainability issues and conclusions

Proposed development

The proposed development of Croslands Park is for 28 dwellings. The Transport Assessment for the nearby recently approved land at Meadowlands is publicly available and includes accepted values for local housing generations drawn from the national TRICS database. For the purposes of this outline assessment, we have used the same information and assumed 28 dwellings. This provides AM peak hour arrivals of 4 vehicles, departures of 12, and evening peak period arrivals of 11 and departures of 6. This provides a total of 15 arrivals and 18 departures over the two peaks (33 in total). We note that the Modelling Report of May 2016 suggests marginally reduced figures of AM 6 arrivals and 10 departures, with PM 9 arrivals and 6 departures, a total of 31. As these numbers are relatively similar, albeit reduced, we have not tried to identify why the current modelling differs from that accepted by the Council in allowing the Meadowlands Development.

Further, the local traffic count and assessment of traffic at the Close junction with Rating Lane, and in particular the high volumes of vulnerable pedestrians in the two peaks, would suggest that it would be advisable that a full Transport Assessment be undertaken of ANY proposed development adding to traffic from Stoneleigh Close, even if the number of houses proposed was reduced further. This is because adding any further traffic to this location will have potentially severe and very hard to remediate impacts specifically on the vulnerable school pedestrian traffic. This potentially significant safety issue and concern must be properly and thoroughly addressed.

Practical difficulties with development

A key matter with any proposed development that opens up the current cul-de-sac further is that even at present, the Close does not meet present design standards which are there to promote safe journeys and traffic environments. This is apart from the impact on the Rating Lane junction noted above which are further considered below.

Considering the Design Guide, the Close does not currently meet the standards for a minor access road. Detailed comparison of the parameters with issues are shown below:

- Carriageway width 5.5m at least for first 15m: actually 5.08m reducing to 5m with no opportunity to widen
- Minimum of 40m forward visibility: measured at 20m to 28m maximum with no opportunity to improve – also worsened by the alignment at particular times of year in terms of sun impacts
- Footway width 1.8m usually on both sides: 1.34m throughout and one side only, again, no opportunity to improve.
- Verge width 0.5m surfaced margin for vehicle overhang – there is none and no scope at all to improve

- Direct accesses not within 15m of road junction: some exist, and again there is no opportunity to improve.

Present resident experience is that care has to be taken for many of their departures and arrivals into the Close, particularly when non-local, less familiar delivery vehicles and visitors use the Close.

For these reasons, we concur with the Cumbrian County Council view that any development opening up the Close is a non-starter. The Close is definitely an insufficient and impracticable route for any access at all to the proposed development at Crosland Park. Adding any longer distance to the Close would potentially increase traffic speed approaching already dangerous bends and entrances to driveways.

Furthermore, there are severe capacity and safety implications of adding any further traffic to the Close / Rating Lane junction, and in fact adding any traffic to Rating Lane at all. This precludes use of any other access route from Crosland Park across to Rating Lane at any point north or south of the Close. We concur with the Cumbrian County Council viewpoint that Rating Lane is 'already busy' and would go as far to say that it is currently at or beyond practical and safe capacity particularly in the morning school peak hour, which could not be easily revised or amended.

There is currently no space or option available by which the Close / Rating Lane junction could be improved, nor for adding any additional capacity to Rating Lane itself, or its junctions in the immediate vicinity. We believe that any further traffic added would bring significant capacity and safety concerns, and would strongly compromise safe operation of at least the Catholic School, if not the other schools currently operating in this area.

The current morning peak hour departures from the Close were around 16 vehicles. The latest estimate development traffic would add a further 12 – a 75% increase in traffic joining at this busy junction. This implies that the current vehicle movement every four minutes would reduce to an extra vehicle every two minutes, which would significantly increase the pressure on departure and the likelihood of either collision with pedestrians or with standing vehicles on the northern section of Rating Lane.

We would therefore conclude and concur with Cumbria County Council that Crosland Park has no highway frontage towards Rating Lane which can be revised or used to provide any access to any development, however small, of that site. We would therefore recommend that the site be removed from Table 6 of the Local Plan and the comment about access via Stoneleigh Close amended to clearly state that such access is impossible. For the sake of clarity, we do not consider that any further development on Stoneleigh Close, or adding any traffic to the Close, is possible or safe.

In fact, there is a very strong and urgent need for a review of the overall traffic and needs of Rating Lane potentially seeking significant change to operating practices of the local schools in terms of strong attempts to reduce private car arrivals further. The additional traffic already committed from the granted development at Meadowlands is likely to have much more impact at this point than was identified in the Transport Assessment (partly because the TA was not focussed on this section of Rating Lane as it was felt impacts had dissipated at the exit from the current Meadowlands, which is true at that point, but as can now be seen from the traffic data recently collected, not likely to be correct at the Close junction or in front of the Catholic School.

There may also be other sites contained within Table 6 which have impact on Rating Lane and we would expect this to be clearly documented in any supporting information promoting the proposed Local Plan.

Sustainability Issues

There is currently no practical public transport provision along Rating Lane and no real opportunity to add further cycling encouragement measures along this route beyond those already there. Adding further pedestrian improvements is critical, but may not be an easy task to achieve, if at all. The provision of special school buses proves this point.

Construction Issues

This report so far has concentrated on the safety impacts of the additional traffic generated by the new houses once built, but we also need to consider the construction stage. If the development was approved this would mean a high number of construction vehicles of various weights and sizes using Stoneleigh Close and Rating Lane. This very dangerous situation could easily last for a period of 2 to 4 years. Also the very real potential for mud and debris on these roads would make it even more hazardous. This would be in addition to the site traffic from the nearby Meadowlands development.

The sub-standard road width of Stoneleigh Close would make access for the larger construction vehicles very difficult, taking on board parked vehicles and tight corners. There would be a high probability of two larger construction vehicles meeting on Stoneleigh Close and being unable to pass each other. As mounting the pavement is not allowed (Highway Code section 8 No. 145) one would need to reverse, possibly round one of the blind bends. This could be dangerous and is certainly not good practise, especially on a regular basis. Residents feel this would be an accident waiting to happen. Such reversing is not allowed under the Highway Code section 6 No. 201.

It is accepted that a Construction Management Plan would be required for any new development, although the comments above suggest this would be very onerous and potentially not even practicable.

Conclusions

We strongly support and concur with Cumbria County Council that the Crosland Park development is a non-starter. The limited highway frontage of Stoneleigh Close cannot be revised geometrically to provide safe access. Further, the additional traffic would have a significant safety impact on current Close residents, on those using Rating Lane to access schools, and particularly on vulnerable school pupils to the Catholic School and to the other schools in the area. It would also have capacity impacts on the Close / Rating Lane junction and on capacity along Rating Lane, and therefore increasing further safety issues along this key access route. Further, construction phase impacts would be significant on both Close residents and those using Rating Lane.

We do not believe there is any highway frontage from Crosland Park towards Rating Lane that is practicable, safe or viable for development. We therefore recommend the site be removed from Table 6 in the final version of the Local Plan housing assessment currently under preparation. Notes where relevant should be amended to record there is no safe nor viable access route via the Close.

The only way by which any access could be considered for this site would be if alternative highway access was provided, perhaps by an alternative access via the Rugby Field site to the west which recent information suggests may be offered for housing.