Rossendale Local Plan Examination

MATTERS, ISSUES AND QUESTIONS (MIQs)

Rossendale
BOROUGH COUNCIL

Matter 15 – Employment and mixed-use site allocations

Issue – Are the proposed employment and mixed use allocations justified and deliverable and in-line with national policy?

NE1 – Extension to Mayfield Chicks, Ewood Bridge
NE2 – Land North of Hud Hey, Haslingden
NE3 – Carrs Industrial Estate North Extension, Haslingden
NE4 – Extension of New Hall Hey, Rawtenstall and Policy EMP7
NE5 – Baxenden Chemicals Ltd, Rising Bridge
M1 – Waterside Mill, Bacup
M2 – Spinning Point, Rawtenstall
M3 – Isle of Man Mill, Water
M4 – Futures Park, Bacup; and Policy EMP6 (also see Matter 4)
M5 – Park Mill, Helmshore

The general questions below apply to all of the sites within Matter 15 and the answers will correspond with the respective letter.

The additional specific questions raised by the Inspector in the MIQs document for certain site allocations will be set out under the relevant site allocation.

General Questions

a) Is the site suitable for the proposed use? Are there any specific constraints or requirements associated with the site, or a need to seek mitigation measures to achieve an acceptable form of development? Should these be specified in the Plan?

b) Is the proposed site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?

c) Is the site available and deliverable in the timescales envisaged[1]?

[1] As set out in the housing trajectory in the Council's Response to the Inspector's Pre-Hearing Note (Question 13)

If the Inspector deems it to be appropriate, further detail could be provided on those sites where specific constraints and/or mitigation has been identified (if these are considered to necessitate specific guidance). This could include a site plan and a brief summary of considerations and could be prepared for relevant sites as a Main Modification.

The following commentary has been informed by evidence in the Employment Land Review (ELR) (EB017) and, where relevant, the SHLAA 2018 (the Heritage Impact Assessment (EL1.002g), Strategic Flood Risk Assessment 2016 (EB032), Green Belt Review 2016 (EB022), Employment Site Access Study (EB038) and responses from consultees such as Highways England and LCC Highways (see Regulation 19 responses SD010). These have provided information on constraints and, if identified, potential mitigation. Further information provided as part of a planning application has also been used where relevant.

NE1 – Extension to Mayfield Chicks, Ewood Bridge

a) The Employment Land Review (ELR) 2017 considers the site and the existing employment site to the south as suitable for B uses. The study recommends retaining the existing employment site, but not to allocate the Green Belt land to the north-east for employment use.

The Council argues that exceptional circumstances exist for the release of Green Belt land at this site which is discussed in the Green Belt Topic paper (EB023). The Green Belt study identifies this parcel as suitable for release and considers it to have defensible boundaries. This land is also partly brownfield and is adjoining an existing employment site.

The constraints identified are the location of the site in a small settlement (i.e. relatively isolated), potential flood risk and ecological features.

b) The site's gross area is 2.81ha. It is likely that due to the constraints and, the net developable area is likely to be smaller than the gross area, probably by about 25%, given the site's location would require sensitive landscaping.

c) The site is available based on discussions between the landowner and RBC representatives. It is considered that the site is deliverable within the Local Plan period, and given that there are no particularly exceptional constraints, providing suitable mitigation measures are proposed, will come forward sooner.

Specific question

i) Is the site appropriate in flood risk terms? Have the concerns of the Environment Agency regarding flooding and the application of the sequential test been addressed?

The Strategic Flood Risk Assessment states that the site is suitable subject to a Flood Risk Assessment.

The Environment Agency stated in an email dated 8 August 2019 that their concerns have been addressed and that they have no further objections on this site (please see a copy of their email in Appendix 1).

NE2 – Land North of Hud Hey, Haslingden

a) The ELR 2017 considers the site suitable for employment use. The undulating topography of the site has been identified as a constraint as well as the vehicular access. The Employment Site Access Study considered the preferred option to be using the existing access to the industrial estate, although it would comprise the existing industrial estate. The option is considered deliverable subject to geotechnical investigations. The site is currently designated as Green Belt. The Council argues that exceptional circumstances exist for its release from the Green Belt and these are discussed in the Green Belt Topic paper (EB023).

The Green Belt study does not recommend the release of this site (parcel 10) because of its role in separating Haslingden and Rising Bridge. However, discussions with local developers indicate strong interest, in particular due to its proximity to the A56(T). There is also an overall shortage of suitable employment sites close to the A56.

b) The site net developable area of 2.70 ha is considered appropriate. The ELR estimated the net developable area at 2.71 ha by considering 90% of a gross area of 3.02 ha. The site boundaries between the ELR and the site allocation are slightly different which explains the 0.41 ha difference between the gross area measured.

c) The site is available and actively promoted for development as evidenced by the representation received during the Regulation 19 consultation (reference 112, Appendix 3) and the appointment of a planning agent. The development is expected to be delivered later within the Local Plan period.

NE3 – Carrs Industrial Estate North Extension, Haslingden

a) The ELR 2017 considers the site suitable for employment use. It was rated 'very good' in the study and identified as a new strategic employment site for the Borough. One of the constraints identified is the vehicular access to the site. Highways England have raised a concern regarding access from Commerce Street and land stability. The Employment Site Access Study has suggested that an access from the south of the site, off Commerce Street, can be delivered subject to further technical work, such as geotechnical investigations. The Heritage Impact Assessment raised concerns due to the potential effect on two heritage assets. However, it is considered that adequate landscaping can help mitigate the impacts on the heritage assets. One of the heritage assets (Britannia Mill) is currently situated within an existing employment site.

b) The estimated net developable area of 4.84 ha as set out in the ELR 2017 is considered appropriate as it comprises approximately 85% of the gross site area (5.67 ha).

c) The site is available for development as evidenced by the landowner representation at the Regulation 19 stage (reference 5164). The site is expected to be delivered later within the Local Plan period.

Specific question

i) Can the site be safely accessed? Is it available for development? Have the concerns of Highways England been addressed?

The Employment Site Access Study have suggested that an access from the south of the site, off Commerce Street, can be delivered subject to further technical work, such as geotechnical investigations. However, if this access is not viable as a result of the geotechnical investigations findings, an alternative access would need to be identified.

The site is considered available for development as evidenced by the landowner representation at the Regulation 19 stage (reference 5164).

The Council believes it has satisfactorily addressed Highways England concerns regarding the principle of an access to the site from Commerce Street. A geotechnical review of the site has been undertaken by Betts Associates which answers Highway's England's issues and this is available in Appendix 2.

NE4 – Extension of New Hall Hey, Rawtenstall and Policy EMP7

a) The amended site pro-forma of the Employment Land Review Update 2019 concludes that the site is suitable for employment subject to further work regarding the a new access road from the industrial units

at New Hall Hey and on the feasibility of a bridge over the River Irwell. The constraints identified also include an undulating topography, ecological value, flood risk, the presence of utilities above and below ground and residential properties to the south which will require appropriate mitigation.

b) The net developable area of 5.20ha is considered appropriate, although the ELR Update 2019 estimates the net developable area as 5.06 ha based on the constraints identified.

c) The site is considered available and deliverable during the Local Plan period, albeit it may not come forward untl the latter part io the Plan. The landowners have engaged an agent and have been in discussions with the Council regarding future users of the site and access.

Specific questions

i) Can the site be safely accessed? Have the concerns of Highways England been addressed?

Lancashire County Council stated in their comment at Regulation 19 (reference 5197) that the access to the western part of the site is limited by the new industrial units approved and that the access to the eastern part of the site should be secured via the western part. They also commented that the access onto the existing highway network seems achievable but major infrastructure works would be required to access the site.

Highways England noted in their comment at Regulation 19 that the cumulative impact of four employment sites, on the new junctions on the A682 have not been assessed. However, the Council only propose to allocate one strategic employment site which comprises two parcels of land (EMP11 and EMP72) with no proposed new junction from the A682. Indeed, the preferred option identified in the Employment Site Access Study is from the existing roundabout on the A682 with a new access road leading to the proposed site.

i) Is the site appropriate in flood risk terms? Have the concerns of the Environment Agency regarding flooding and the application of the sequential test been addressed?

The SFRA assessed the part of the site to the west of the River (reference SFRA175) for employment and considered it suitable subject to a Flood Risk Assessment. The study also assessed the part of the site to the east of the River (reference SFRA155) for residential use and recommended to undertake an exception test. The site is currently proposed for employment use and the Flood Risk incorporating Sequential Test Topic

Paper (EB033) shows that in line with the Flood Risk and Coastal Change PPG, employment use is classified as 'less vulnerable' and is therefore considered appropriate in flood zone 3a.

The Environment Agency have no outstanding concerns for this site as evidenced by their email shown in Appendix 1.

ii) Would Policy EMP7 ensure the site can be developed in a way that achieves good design with particular regard to its relationship with Rawtenstall, the landscape and the Steam Railway?

Policy EMP7 requests a development proposal for the site to include a Design Code. This Design Code should incorporate a number of elements set out in the policy, including a landscape structure reflecting the status of the site as a 'gateway' to the Borough as well as its relationship with the Irwell Sculpture Trail and the River Irwell.

The policy could be improved by adding a criterion to the Design Code, requesting a development proposal to demonstrate good design in relation to the East Lancashire Railway.

iii) What are the site specific infrastructure requirements? Are these viable particularly the bridge over the River Irwell?

The Employment Site Access Study preferred option includes a new access road from the industrial units for the western part of the site and a bridge over the River Irwell to access the eastern part of the site.

The study considers the preferred option as potentially deliverable pending further technical work. The associated mitigation costs are estimated to be over £500,000.

The Viability Assessment (EB019) undertook a general typology testing for B1, B2 and B8 uses which shows no viability. However, the testing was based on brownfield development scenarios. The Council will seek to identify funding to enable the deliverability of the site.

NE5 – Baxenden Chemicals Ltd, Rising Bridge

a) The ELR 2017 considers the site suitable for employment use. No significant constraints have been identified.

b) The net developable area of 4.40ha is considered appropriate based on approximately 90% of the gross area.

c) The site is available as it is owned by the adjoining business that is wishing to expand. It is expected to be delivered within the Plan period.

M1 – Waterside Mill, Bacup

a) The site is brownfield and is within the existing urban boundary. It has been assessed in the ELR which recommends that mixed use development would be suitable, specifically for residential, retail and B1a office use. The allocation in the Local Plan also includes B2 based on further discussion with Council officers and local knowledge. This is in recognition that any use will be on a small scale and is within an area which is already characterised by mixed use development, involving B2 uses. A range of potential uses on the site will also maximise opportunities for the viable redevelopment of the listed building. This is considered to be compatible with the surrounding area.

Potential constraints identified for the site include, its existing condition (vacant/derelict) and the lack of space for any expansion. The site is located within Flood Zone 2 and the mill building could also potentially be suffering from structural damage and be contaminated. Heritage impact will also require specific attention as the Mill is Grade II listed and is located within the Bacup Conservation Area.

b) The capacity of the site is based on the conversion of the multi-storey mill building and redevelopment of additional land. It is considered to be appropriate.

c) The site is considered developable (for housing) in years 6-10, as envisaged.

M2 – Spinning Point, Rawtenstall

This site has planning permission (2017/0617) for the uses identified in the Local Plan. This forms Phase 2 of the wider development; Phase 1 is already underway.

M3 – Isle of Man Mill, Water

a) The site is partly brownfield with existing employment uses on sites, adjacent to residential, so the proposed mixed use proposed is considered to be suitable. The ELR states that the site suits mixed use or residential development but does not identify specific suitable employment uses.

Potential constraints include the need for refurbishment of the existing buildings, topography and its proximity to Whitwell Brook which is categorised as Flood Zone 3.

b) The net developable area of the site is identified as 0.51ha which is less than half of the gross site area. This takes account of the identified constraints and is considered to be appropriate.

c) The site is considered developable (for housing) in years 6-10, as envisaged.

M4 – Futures Park, Bacup; and Policy EMP6 (also see Matter 4)

a) The site is partly brownfield and partly within the existing urban boundary. Part of the site is an existing employment area on the Core Strategy Proposals Maps. The site includes existing employment / office uses and is considered suitable for the mix of other uses identified in EMP6 (see Matter 4 for an update on the Gypsy and Transit site), making the best use of its existing highway access and proximity to wider recreation areas. Part of the site has planning permission for industrial uses (2019/0102) and the construction has now commenced.

b) The capacity of the site is considered appropriate.

c) The site already has existing uses and work is underway for additional development so it is considered deliverable. It is largely in local authority ownership so is considered available.

M5 – Park Mill, Helmshore

a) This is a brownfield site within the exiting urban boundary. The ELR recommends that the site is released for mixed-use development as a flexible approach is most likely to generate future redevelopment interest. It notes the site is peripheral, and adjoins residential properties to the north, east and west. The employment use of the site is diluted by alternative uses including residential and a café/tearoom. It is considered that the site should no longer be protected exclusively for employment uses. A flexible approach to any potential redevelopment of this area should be explored, for a combination of employment, residential and other uses such as retail, sui generis and leisure. As a result the site is identified for A1 and A3 uses in the emerging Local Plan. Potential constraints include flood risk and the need to refurbish the existing building and existing residential use within the curtilage of the building. Park Mill (0.86 ha gross/0 ha net) is recommended for release from employment to mixed use development in the ELR.

b) The capacity of the site is considered appropriate.

c) The building already includes existing uses and is considered available and deliverable.

Appendix 1

Storm Grimshaw
Rossendale Borough Council
Planning Policy
Futures Park
BACUP
Lancashire
OL13 0BB

Our ref: NO/2012/104518/PO-04/SB1-L03
Your ref:

Date: 8 August 2019

Dear Storm

SITE NE1 (MAYFIELD CHICKS, EWOOD BRIDGE) AND SITE NE4 (NEW HALL HEY, RAWTENSTALL)

I refer to the above employment allocations and the flood risk comments we submitted in response to the Local Plan Regulation 19 consultation.

I have reviewed your e-mail dated 8 August 2019 and based on the conclusions of the Rossendale Hybrid Level 1 and Level 2 Strategic Flood Risk Assessment (November 2016) and the Rossendale Local Plan Flood Risk Incorporating Sequential Test Topic Paper (March 2019), our previous concerns have been addressed and we have no objections to the allocation of the above sites.

Yours sincerely

Philip Carter
Planning Officer - Sustainable Places

Appendix 2

19CHE225/DK/MF/LTR1

15th August 2019

FAO Mike Atherton
Planning & Building Control Manager
Rossendale Borough Council
Room 120
The Business Centre
Future Park
Bacup
OL13 0BB

Dear Mike,

New Employment Site NE3, Carrs Industrial Estate, Haslingden, Rossendale

Introduction
Rossendale Borough Council (RBC) are undertaking a review of proposed allocated sites to
include within the local development plan. One of the sites being considered for allocation is New Employment Site NE 3- Carrs Lane Industrial Estate North Extension, Haslingden. Initial consultations have been made with relevant parties and Highways England (HE) in particular have raised some concerns with the site and so Betts Geoenvironmental have subsequently been appointed to undertake an initial geotechnical review of the site and the geotechnical feasibility of delivering the development, whilst addressing specific geotechnical concerns raised by Highways England (HE) in correspondence with RBC.

Background
The site is located to the north of the existing Carrs Industrial Estate, on the north western edge of Haslingden, adjacent to the A56 dual carriage way. To avoid Lancashire County Council concerns (regarding suitable road junctions, traffic movements and visibility) there is a need to utilise/upgrade the existing access to the south of the site off Commerce Street. However, HE have raised concerns with regards to safe guarding their existing assets associated with the A56, in particular the existing slopes and Commerce Street Bridge abutments.

Site Description and Topography
The main development site which is being considered for allocation comprises low lying generally level (poorly draining, given the presence of rushes) agricultural grazing land adjacent to the A56. The site is located principally in the bottom of a valley feature close to the western valley slope, with land to the west increasing in elevation.

The A56 runs along the bottom of the valley feature approximately north-south, along the former route of the Ramsbottom to Accrington railway line.
In the south of the site the valley narrows and a tongue/lobe feature (North Hag) extends eastwards, the A56 passes through this feature via a cutting, with Commerce Street passing over the A56 east-west via a bridge. The proposed new access route to the development would utilise and existing access road located to the south of the site off Commerce Street which was constructed at the time of the A56 to provide access to a number of farms(including Sunny Field) to the west of the site.

The A56 in the vicinity of the site was principally constructed on the track bed of the former Ramsbottom to Accrington Railway, which closed in 1966. The railway originally passed through North Hag/Nags Head via North Hag Tunnel, this was removed as part of the construction of the A56 and it is estimated that 500,000 tonnes of rock and sand was removed for use in upfilling works elsewhere along the A56 route. A cutting was created to carry the A56, along with the realignment of Commerce Street and the construction of a new bridge to carry Commerce Street over the cutting.

Historical photos from https://haslingdens.blogspot.com/2008/10/blog-post.html and an as built drawing supplied by HE (copy enclosed) suggests that this was principally a 'cut' exercise with the re-grading of existing slopes. The farm access road appears to follow the natural topography to limit road gradients and tie in with Bridge Street, which provided original access up North Hag to Sunny Field and other farms. The topography of the partially wooded slope (~20m in height) above the access road is low to moderate (~14°- 22° slope angle), with a 2-3m strip being comparable with the road, before increasing slightly in angle for 3-6m before steepening further. The slope in the north appears to have changed little as part of the A56 construction, tying in with the surrounding topography, and suggests only minor regrading works. The slope in the south has been created by more significant cut works.

Below the access road a steeper (now wooded) slope/cutting (~20m in height) was created with a moderate slope angle (~24°), the crest of which generally has a 2m stand-off from the road and is protected by a crash barrier. There is no obvious evidence of slope instabilities on either slope/cutting.

The access road is generally 4m wide with a 1m wide overgrown gravel drainage located on the upslope side, widening to 7m where there is a passing bay approximately 30m in length.

Geology
The British Geological Survey (BGS) sheet 89NE – Haslingden, Blackburn, Over Darwen 1:50,000 Geological map indicates that the proposed access road area of the site is underlain by Infilled Ground assumed to be generated through the earth works associated with the construction of the A56. The east of the main site is shown to be directly underlain by Alluvium and the west by Glacial Till (probably associated with the change in slope noted in this area). No superficial deposits are denoted in the southwest of the main development site area.

Bedrock comprises the Brooksbottom Grit -Sandstone in the north of the site and the Lower Haslingden Flags -Sandstone in the south.

The BGS hold a number of historical exploratory hole records, which were undertaken in the vicinity of the site, associated with the construction of the A56 dual carriageway. The records indicate that the ground conditions in the vicinity of the proposed access road generally comprise a sequence of loose or soft mid grey- brown to mottled mid grey to mid-brown, mottled orange sandy silty CLAY to clayey sandy SILT with gravel size stones at shallow depth over dense to very dense dark grey to mid-grey brown silty sandy GRAVEL with cobbles and boulders, occasionally slightly clayey with localised clay or silt bands to between 5.3m and 10.0m bgl. Localised thin fibrous Peat deposits were recorded at shallow depth in the vicinity of the main development site.

Underlying these deposits loose to medium dense silty to very silty fine SAND with silt bands were generally recorded to depths of between 16.0m and 27.0m bgl, underlain by medium dense to very dense well graded GRAVEL with some sand and clay binding to between 18.2 to 32.0m bgl. Possible bedrock was encountered in two boreholes at 18.2m and 26.0m bgl.

Groundwater conditions appear to be variable however generally boreholes remained dry to depth.

It is not clear how the removal of North Hag Tunnel and the associated overburden has changed the ground levels and ground conditions since the exploratory holes were undertaken however as the construction of the A56 in the vicinity of the site principally involved a 'cut' exercise it is anticipated that the deeper ground conditions are representative of the existing ground conditions.

Highway England Concerns

RBC have provided us with a copy of various email correspondence between themselves and HE, in which HE state that in the case of utilising Commerce Street as a access route it may 'simply be unviable; quite likely in cost terms'. A summary of the pertinent HE concerns are summarised below:

1. The underlying problem is the topography and geology of the Rossendale Valley.

2. The Cutting across which the existing access track/road runs was cut to a slope angle of about 1 in 3 to 1 in 4, which are quite shallow angles for highway cutting design and suggest that the designers could not achieve appropriate stability for a steeper slope.

3. HE drawings show slope face drainage across both slopes, which indicates that groundwater was encountered during the construction and drainage was installed to control seepage and improve stability.

4. Borehole records show significant thickness of glacial deposits which extend below the toe of the slope. These deposits contain a mix of layers of sands, gravels, silt and soft clays, which in this combination require careful slope stability analysis of any changes that may be required and slope management as

this material is very difficult indeed to work with. Any existing slope drainage would need to be maintained or enhanced as part of any scheme.

5. The main development site recorded weak alluvial soils and Peat which will require careful consideration for development. The area is drained via a culvert passing below the A56 and this too would need consideration in any scheme.

6. There is a risk that a cut and fill operation would load this unstable land beneath and push-up the surrounding land including the A56 carriageway.

7. Both slopes/embankment s are not natural features, the existing access road seems to have been designed to sit along contours to aid the stability of the higher slope.

8. There would be significant amount of earth shifting beyond the existing access road to create a level access to the development land beyond. All this work will not be cheap. The question is therefore 'is the allocation actually viable?

9. The complexities involved here are such that they need to be resolved now and can't be left until planning application stage – they are fundamental to public safety and the viability of the sites.

Comments Regarding Highway England Concerns
In general comment to the above it is our understanding that HE should only provide comment with respect to the impact the development may have on HE assets only and not provide comment in relation to the feasibility of the overall development and issues that do not directly impact HE assets, as they have done.

Our comments/response to the pertinent HE Concerns detailed in the previous section are outlined below:

1. The topography and geology of the Rossendale Valley is highly variable, issues have arisen and are on-going with the A56 and the Woodcliffe Landslip, however the geology and topography are considered to be very different to those anticipated at the subject site. While we understand that each potential development should formulate a detailed ground model and take into account any potential slope stability issues a development may have, it is unfair to judge every potential site within the Rossendale Valley, based on the issues which have arisen at Woodcliffe, however significant these are.

2. The cutting across the existing access track/road appears to be steeper than HE have identified from initial assessment with the upper slope varying between 14°-22° and the lower slope being approximately 24°. The angle of the slopes (particularly the upper slope) appear to be more of a function of the surrounding topography as the slope is not uniform and tying in with this rather than not being able to achieve appropriate stability as a short distance to the north there are natural slope angles which are in excess of these and appear stable. The winding nature of the access road appears to be as a result of following the slope topography and in order to limit road gradients as much as possible.

3. Face drainage would be anticipated in slopes of this size constructed in Glacial material, to control seepages and improve stability. The presence of such features does not indicate that there was slope stability issues during construction and these features are likely to have been included in the design stage.

4. Any scheme will need to ensure appropriate existing slope and site drainage is maintained or enhanced, however this should be addressed during the planning stage as part of any detailed design and will need to be approved by the regulators.

It is anticipated that a slope stability assessment will be undertaken to support any highway design. While the ground conditions need careful investigation and appropriate design, the construction of the original railway tunnel, tunnel headwalls and associated slopes suggests that the ground conditions are not significantly difficult and this is further supported by the existing slopes created as part of the A56 construction appearing to be stable, with no evidence of significant issues encountered during construction which required remedial action or a hard engineered solution.

5. The anticipated ground conditions are not significantly onerous and although localised weak and compressible soils maybe present these are not unusual and it is anticipated that these can easily be overcome at the design stage. It is not anticipated that remedial costs will be significantly expensive and will not make the site undevelopable. Similar ground conditions are present to the east of the A56,and this area has been developed with mill complexes and modern steel portal framed buildings. The area is currently drained via a partially culverted watercourse, which appears to have been diverted as part of the A56 construction works. Any proposed scheme would be designed appropriately to limit the impact on the watercourse and given the current Greenfield nature of the site, any drainage design will require a significant betterment to existing discharge rates. This should be addressed through the planning stage and detailed design. In summary the development has a discharge point to deal with surface water and appears to have a reasonably straightforward drainage strategy, with site levels falling towards the watercourse in the east.

6. An initial assessment indicates that no significant cut and fill works are anticipated across the main development site with existing site levels (generally) retained, some fill works are likely to be required to connect the main site to the proposed access road, however this is a considerable distance from the A56 and any potential heave/settlement can be addressed during detailed design.

It is anticipated that there will be a requirement to import fill to site, so site levels should be designed to ensure any uplift is kept to a minimum.

7. As previously outlined above, the alignment of the existing access road appears to be more of a function of following existing contours to ensure road gradients are kept to a minimum. The lower slope is uniform , whereas the upper slope is not and suggest that this slope was created, more as result of a minor regrade rather than the creation of a new slope. In places the road is located directly above the crest of the lower slope and there is no sign of any

slope movement as a result of road loading or any other mechanism. Historical photos suggest that the upper slope has not been significantly altered with only vegetation clearance, minor regrading and the installation of drainage undertaken.
8. The construction of a new access road would require earthworks to be undertake, to provide a suitable access road into the main development site, however while this work will not be insignificant it is anticipated to be well within the budget of enabling works for a development of this nature and size. There is an existing farm track which provides access from the existing access road with only minor alteration to the existing upper slope profile. This follows the natural topography as much as possible and while any new access road will require lower gradients, the presence of the track indicates that this could be achieved without an onerous and relatively expensive solution.
We do not believe it is in the remit of HE to comment on whether the 'allocation is viable' with respect to enabling works and general development costs associated with the main site.

9. While the site is not without its geotechnical issues, the complexities are well within what would normally be anticipated for a development of this size and nature. Whilst some issues are fundamental to public safety, it is anticipated that all of the issues can be overcome through the appropriate planning and design process, at a cost which does not make the development economically unviable or unattractive to potential developers. The purchase price of the land should take into account these development costs.

It is understood that preliminary highway design work is to be commissioned and once this has been completed we would be able to provide further comment. However, it would appear from our initial assessment that a safe and reasonable access road could be constructed along the approximate line of the existing access road. It is anticipated that the existing road could be widened to the west, where there is a 2m vegetated strip of land which has a comparable topography to the road. Some further widening beyond this is likely to be required to achieve an adoptable standard however it is anticipated that this will only require minor alteration to the existing upper slope profile, with some possible minor retaining works required. The works if appropriately designed should therefore not result in the integrity of HE assets being compromised, while allowing suitable access and ingress to the site. It is therefore our opinion that there are no geotechnical constraints to the site which mean the site should not be put forward for allocation within the local plan.

Furthermore we do not believe that the geotechnical and highway design need to be undertaken in accordance with HD22/08 and instead as the highway is likely to be adopted by LCC, it is recommended that the works are undertaken in accordance with their guidelines/approval. However, it is noted that the current access road and surrounding land is under the ownership of HE and therefore any design in principal is likely to require HE approval prior to any potential sale.
We trust you will find the foregoing of assistance, however, if you have any queries or require further information please do not hesitate to contact us.

Yours sincerely

David Kitching
Principal Engineer
BETTS GEO ENVIRONMENTAL
Encs. Highways England As-built drawing