

Rainow Parish Council

Minutes of the Meeting held 15th December 2020

at 7.30 p.m. (Virtual Meeting)

Present:

Councillors - A Brett (Chairman), A Taylor (Vice Chairman), R Balment, K Butler, J Cantrell, S Frith, N Gabbott, S Johnson, M Marsh, L Moskowitz, and J Rathbone. Also present were two members of the public, the Parish Clerk and Ward Councillor A Gregory.

275/20 THE COUNCIL RESOLVED to **accept** apologies for absence from PCSO Jim Newns. Apologies were not received from Councillor L Pickford.

276/20 THE COUNCIL RESOLVED to **receive** Dispensations and Declarations of Interest: None declared.

277/20 THE COUNCIL RESOLVED to **approve** the Minutes of the Meetings dated Tuesday 17th and 24th November 2020 which, were confirmed as a correct record and were signed by the Chairman.

278/20 THE COUNCIL RESOLVED to **receive** the following Questions from Members of the Public (MOPs): No MOPs wished to speak.

279/20 THE COUNCIL RESOLVED to **receive** report from the Macclesfield Neighbourhood Policing Team on various issues (PCSO J Newns):

PCSO J Newns has now been linking in with schools. It has been a difficult month with surgeries cancelled due to the Government Guidelines on COVID19. Surgeries will commence running from the church again soon. The police post box has been useful during this time.

Trucam has been deployed on Church Lane and continues to be a regular feature in policing Rainow. PCSO J Newns has applied to have TRUCAM codes on Rainow Road as it hits the 40mph stretch at the top of Higher Hurdsfield. He has monitored the speed and the road justifies a TRUCAM site. Members wondered what this means.

Attention has been given to farmland stopping mountain bikers from riding in unauthorised areas and signage given out.

Members wondered what was happening regarding the grants mentioned by the Policing Team.

280/20 THE COUNCIL RESOLVED to **receive** the following report from the Cheshire East Ward Member on various issues:

- Regarding the Walker Barn Quarry Application – he has been in contact with the Peak Park for their views (although not in the area). They are putting together comments with a view to submitting soon.
- There is a full Cheshire East Council Meeting on Wednesday at which they will be discussing a motion to default 20 mph in central urban and residential roads. It has been subject to a lot of email comments and generally felt to be a good idea but will need further research. Members were asked to send their comments direct to the Ward Councillor however, Members agreed Round Meadow, Millers Meadow and associated closes, Stocks Lane would benefit from this. Parish Council generally felt that they would support 20 mph in all residential areas off the main road.

The Ward Councillor was asked:

- If he could assist in finding out the resolution regarding the land height at “Land adjacent to Stocks Lane Cottages”. Messages have been left with Cheshire East Planning Department without a single call back.
- Whether there would be an enquiry regarding the snowfall gridlock in Rainow. There were a number of accidents with residents unable to get in or out of Rainow caused by just two inches of snow (on Friday 3rd December).
- When are grit bins to be filled and a new bag of grit left in car park? Members would like a list of what they are doing in the Rainow area.

MATTERS FOR CONSIDERATION BY THE COUNCIL

281/20 THE COUNCIL RESOLVED to receive report regarding website accessibility/email requirements:

- Website – work progressing. Ongoing.
- Emails – all Members to be forwarded set up information for email in the New Year. Ongoing.

282/20 THE COUNCIL RESOLVED to agree the continuation of virtual Parish Council meetings.

283/20 THE COUNCIL RESOLVED to agree to contact Cheshire East Council informing them of the consultation regarding proposal for signage on Kiskhill and Jumper Lane. The consensus from our residents was that they preferred the following:

- “No Vehicles except for Access” signs at each end of the restricted byway section, i.e. at the entrance to Jumper lane from Blaze Hill and on Kiskhill Lane immediately above Clarke House/Back o’ the Crofts’.
- Concealed junction signs on Blaze Hill, either side of the junction with Jumper Lane.

284/20 THE COUNCIL RESOLVED to note Christmas Tree collections on Saturday 9th or Sunday 10th January and **note** that tree needed to be ready by 9th January.

285/20 THE COUNCIL RESOLVED to note refurbishment works on Mount Pleasant (bus shelter and seating).

286/20 THE COUNCIL RESOLVED to agree Council Meetings set during 2021.

FINANCE

287/20 THE COUNCIL RESOLVED to agree the budget and set the Precept at £14,000 for 2021/22.

Amendment to budget: Notice board to be included in 2021/22 under projects for possible notice board near bowling green development. Explanation of increase to be included in Spring Raven.

288/20 THE COUNCIL RESOLVED to approve Bank Reconciliation and **note** bank statements up to 30th November 2020. Checked by Cllr Rathbone.

289/20 THE COUNCIL RESOLVED to approve schedule of receipts and payments.

Receipts: From

R J & J Balment	Map sales R22 (CASH)	£11.00
R J & J Balment	Map sales R21 (CASH)	£3.00
R J & J Balment	Map sales R20 (CASH)	£1.00
M K & S F Giller	Cash sales (Raven 50, 51, 52 and 53 from Mrs Lowndes, Mr & Mrs Hadfield and Ms L Muldoon)	£12.00

Payments: To

Chq2017	Sarah Giller	Clerks Salary £1317.13 and Expenses £91.19	£1408.32
Spending Power: GPOC			
Chq2018	Neil Townley Ltd	Purchase of Christmas Tree	£225.00
Spending Power: GPOC			
Chq2019	Mr B Foreman	Various maintenance works around Mount Pleasant.	£161.56
Spending Power: GPOC			
Chq2020	Mr J Crowther	123 Linux Essentials Yearly Renewal (1 year)	£71.86
Spending Power: GPOC			
Chq2021	Mr J Crowther	Digital River Ireland Ltd – Kaspersky Internet Security	£79.99
Spending Power: GPOC			

THE RAVEN

290/20 THE COUNCIL RESOLVED to approve Income and Expenditure report for Raven Newsletter up to 9th December 2020.

PLANNING

291/20 THE COUNCIL RESOLVED to agree comments for return to the relevant authority for these new applications:

Application No:	20/4901M
Proposal:	Redevelopment of the site to provide tourist accommodation, including 3 lno lodges, 5no tipi tents, reception building, access track, car parking, adventure play area and walking route.
Location:	WALKER BARN QUARRY, BUXTON NEW ROAD, RAINOW, CHESHIRE

THE COUNCIL RESOLVED to agree the following comments to be sent to Cheshire East Council: **“Rainow Parish Council strongly objects to this application for the reasons set out in Appendix 1.”**

Noted that tip waggons have already started going up to quarry. Clerk to inform planning enforcement and environmental health.

Application No:	20/4907M
Proposal:	Reprofiling of site.
Location:	WALKER BARN QUARRY, BUXTON NEW ROAD, RAINOW, CHESHIRE

THE COUNCIL RESOLVED to agree the following comments to be sent to Cheshire East Council: **“Rainow Parish Council strongly objects to this application for the reasons set out in Appendix 1.”**

292/20 THE COUNCIL RESOLVED to note Information; Decisions, appeals and withdrawals this month:

Application No:	NP/CEC/0520/0466
Proposal:	Demolition of existing outbuilding and replacement with a new outbuilding ancillary to the house.
Location:	The Patch, Macclesfield Road, Rainow

GRANTED

CORRESPONDENCE

293/20 THE COUNCIL RESOLVED to agree that Cllrs Butler and Brett would review the Cheshire East Council consultation on transport and parking (*deadline 31 January 2021*) for submission at the January meeting.

294/20 THE COUNCIL RESOLVED to agree not to comment on Cheshire East Council Pre-Budget Consultation 2021-25.

295/20 THE COUNCIL RESOLVED to agree to discuss with Member of the Public if she would like to look into grant sources available for refurbishment of Jubilee Playground.

296/20 THE COUNCIL RESOLVED to agree to set up working group (Cllrs Butler, Moskowitz and Gabbott) to investigate proposal by Member of the Public for prominent village signs.

REPORTS

297/20 THE COUNCIL RESOLVED to receive report from Footpath Group and **consider** action.

FP47 - Stile on Cali Brook. Clerk to ask Cheshire East to clarify situation e.g. Why was it that residents take over responsibility for stiles? Who is legally responsibility for stile? How was this decision arrived at? Why and when did this change?

298/20 THE COUNCIL RESOLVED to receive report from the Jubilee Playground Inspection Group.

Reported playground in good order.

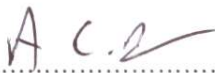
299/20 THE COUNCIL RESOLVED to receive reports on Highways issues and **agree** action.

- Snow – to ask Cheshire East Highways why there was so much chaos on 3rd December and why roads were not gritted.
- Kiskill Lane – 10th December reported cleaning not taken place.
- Blaze Hill – large pot hole 100 yards from the top.
- Bull Hill – pot hole half way between Lower Bull Hill Farm and cottages at the bottom on approach to Rainow side.
- Back Eddisbury Lane – Large pot hole just as you turn onto Back Eddisbury Lane by large white house, to left side of house.
- Reported Councillors do not seem to be receiving spreadsheet of road closures.
- Ewrin Lane – where junction meets Hooleyhey Lane very deep hole where road was repaired. The material appears to be sinking.

300/20 THE COUNCIL RESOLVED to receive report on Poynton Area Community Partnership meeting (PACP). Noted next meeting 13th January 2021. Will be following up grant system particularly for windows in Rainow Institute.

301/20 THE COUNCIL RESOLVED to receive report on affordable housing and **agreed** for Cllr Rathbone to liaise with the rural housing officers at CEC and PDNP regarding appropriate housing for Rainow e.g. to include retirement bungalows.

302/20 THE COUNCIL RESOLVED to receive report from Home Assist regarding issues with SID and note that ongoing issues. Noted that Pott Shrigley would not be carrying on with sharing the SID from April 2021.

Chairman..... 

303/20 THE COUNCIL RESOLVED to receive Chairman’s and Councillors’ reports and consider action:

- To chase quote for bus shelter at the Robin Hood.
- Noted first use of community bus since March by KRIV team.
- Grit bin at the bottom of Hough Lane to be moved to original place.

304/20 DATE FOR NEXT MEETING – Tuesday 19th January 2021 at 7.30 pm. *(to be held virtually)*

305/20 THE COUNCIL RESOLVED to receive items for the Next and Future Meetings.

- United Utilities to attend meeting regarding water supply to answer questions. *(future meeting)*
- To **receive** report from Advisory Group regarding Cheshire East Council Governance Review. *(future meeting)*.

There being no other business the Chairman thanked everyone for attending and declared the meeting closed at 21.02 p.m.

Minutes agreed by Rainow Parish Council as a true record

..... Chairman

APPENDIX 1**Rainow Parish Council Response to proposals at Walker Barn Quarry, Buxton New Road, Rainow
Planning applications 20/4901M and 20/4907M****1. Summary**

Rainow Parish Council (RPC) strongly object to this application which we consider represents inappropriate development for a location within the Green Belt and located immediately adjacent to the Peak District National Park. RPC is particularly opposed to the landfill ('reprofiling') element of the application which provides an unacceptable risk to the health and well-being of many of our residents in the vicinity of Walker Barn through contamination of the water supply to the boreholes and other groundwater sources upon which they rely. No justification is provided as to why the landfill is required and why an appropriate leisure based development could not be provided using the quarry in an unaltered form as has been the case elsewhere.

Our detailed response is given in the subsequent sections of this document, we summarise below our key concerns regarding this application:

Public Health and SafetyRisk to groundwater supplies

Many of the properties located close to the Walker Barn quarry are reliant upon the use of licensed boreholes for their water supply. In addition, water is piped from the direction of the Walker Barn quarry to a pair of reservoirs at Bull Hill Farm, these provide the only water supply to that farm and also supply Marsh Farm. The proposed use of the site for landfill during the 'reprofiling' phase will result in a serious risk of contamination or disruption to these borehole and reservoir supplies. The application does not provide any justification for the landfill ('reprofiling') activity. RPC notes that the ES takes no account of the supply to the Bull Hill reservoirs. In addition, the Environmental Statement (ES) contains a serious error regarding the boreholes in the vicinity of the site. Paragraph 11.45 notes that there are 23 licensed groundwater abstractions within 2 km. of the site with nearest located 182m away. However, Table 11.7 following paragraph 11.105 states in the 'Reprofiling Phase' section that there are '*no licensed groundwater abstractions within 1km of site*'. This is incorrect, as suggested by paragraph 11.45 and we are aware that many of our residents within 1 km. of the site are reliant upon boreholes, thus the conclusion that the residual effect is 'negligible' is likely incorrect. Indeed, RPC note that the assessment of groundwater effects during the 'Tourism use' phase states that '*Presence of potential contaminants associated with proposed reprofiling works will not be present at the proposed tourism end use therefore the risk is significantly reduced*'. Thus the ES acknowledges that there is a significant risk of contamination during the landfill ('reprofiling') activity. RPC consider that any activity that results in risk to the health and well-being of our residents through contamination of their water supply is unacceptable. RPC also consider that it would be negligent for approval to be given to the landfill element given this potential risk. In addition, no proposals are given as to how the water supply for the site will be obtained during the Tourism phase, nor how disposal of waste water and sewage will be addressed. The current aquifer is barely adequate for the existing licensed borehole and reservoir users, with supplies unreliable during dry periods, thus it would be unable to support additional use and could not provide the required supply for the Tourism phase. Waste water and sewage disposal are potentially problematic, households in this area generally rely on septic tanks, inadequate facilities for the Tourism phase provide a further risk of contamination to the aquifer and thus risk to the water supplies and health of local residents.

Transport Safety

RPC note that the application presumes that the current access track into the site and its junction with the A537 Buxton New Road will be improved through widening. However, RPC has been informed that the ownership of the access by the applicant is limited to the narrow single-lane width of the track and this has been confirmed through sight of the relevant Land Registry mapping. Thus widening of the entrance and access track will not be deliverable without the cooperation of adjacent landowners. RPC also note that the safety assessment takes no account of the exceptional traffic speed and accident conditions on the A537 at summer weekends, which would be the times for peak use of the site in the Tourism phase, nor the impacts of development traffic on narrow local roads such as Buxton Old Road.

No assessment has been undertaken of sustainable travel access to and from the site, despite the presence of a continuous footway on the A537 from Macclesfield, a regular bus service with a stop 250m from the site, the dense and well documented footpath network in the area and the recreational facilities at nearby Tegg's Nose, including the 'Grit and Gears' cycle trail. RPC is very concerned that the application makes no assessment for the risk to safety arising from the potential increase in pedestrian and cycling activity due to the development and proposes no measures to address safety for such activities.

Lack of Conformance with Planning Policy

RPC considers that the application does not conform with a number of key current planning policies. These are summarised briefly below and considered in more detail in the relevant section of this response:

- **Green belt - previously developed land** – from the policy definition RPC would expect this to only apply the existing buildings but few other areas of the former quarry which have now returned to nature;
- **Green belt - very special circumstances** - RPC does not believe that the economic benefits of either the landfill of tourism phases would outweigh the damage to the green belt’;
- **Sustainable development** – the application is entirely devoid of sustainable measures in either the landfill or tourism phases. Indeed by its very nature the landfill activity is non-sustainable and a major threat to the local environment as detailed later in this response.
- **Sustainable travel** – the application is also entirely devoid of any sustainable travel measures, these being dismissed on the basis of an incorrect assessment that there are no nearby sustainable transport facilities.

Superficial, incomplete, inaccurate and misleading Environmental Statement and supporting documentation

RPC note that, despite the RPC’s lack of resource and professional expertise, RPC has identified that the ES and supporting documentation contain numerous errors and omissions, misleading information and provide very little information about the Tourism phase of the development. RPC’s impression of the application is that is superficial, contains fundamental errors and inconsistencies, lacks technical rigour and ‘scopes’ out potential areas of assessment with little or no evidence. These points are dealt with in more detail in the main section of this response but some key points of concern are summarised below.

Incomplete and Misleading Consultation

It appears that few, if any, of the local residents living adjacent or close to the site received the consultation leaflet referred to in the Environmental Statement (ES). RPC’s virtual meeting to discuss the application, held on 24th November 2020, was attended by residents from 9 of the properties in the immediate vicinity of Walker Barn, none of whom had received any consultation material. RPC has also received an e-mail from a further household located close to the site unable to attend who also received no consultation material. These 10 local households are strongly opposed to the scheme but appear to have been excluded from the consultation process referred to in the application. Thus the assertion that 56% of consultees were in favour of the development is completely misleading, the inclusion of the responses from the 10 excluded households above would have resulted in 64% of responses (18 of 28) being **opposed** to the development.

Errors and Omissions

A number of important errors and omissions in the documents have been identified by RPC, as noted above and in the detailed text below, including but not limited to:

- Incorrect assessment of the number of licensed boreholes within 1km of the site;
- Lack of consultation with households in the immediate vicinity of the site;
- No consideration of alternative proposals without the landfill element;
- No photo montage to provide an effective assessment of the visual impact; and
- Incorrect statements regarding public transport and footway access to the site.

2. Introduction

Our detailed response is set out below, following the structure of the Environmental Statement (ES) provided by the applicant.

3. Alternatives

Rainow Parish Council (RPC) are very concerned by the lack of alternatives considered by the applicant. In particular, there is no alternative examined as to how the site could be developed without the landfill (‘reprofiling’) requirement. It will be clear from our response that the landfill element is a key concern to the Council and its residents and the documents provided by the applicant provide no justification for the need for the landfill (‘reprofiling’) element.

Should Cheshire East Council (CEC) consider that holiday accommodation is an appropriate use for this site then RPC request that:

- A proper examination be undertaken of the alternative options for using this site in its current form without the landfill requirement. RPC notes that there are many examples of former quarries being used for alternative uses without landfill, with a local example being the Caravan and Motorhome Club site at Grin Low in Buxton; and
- Alternative forms of accommodation be considered that require less fixed infrastructure and thus impact less on the environment, such as tent camping, glamping/camping pods or caravanning/motorhomes.

4. Planning Policy

RPC questions whether the entire site is ‘previously developed’, whether very special circumstances exist and, if so, whether they are outweighed by harm to the green belt. RPC is concerned that the proposals do not constitute sustainable development. RPC has concerns regarding the proposed use class ‘other tourist accommodation’.

Previously Developed Land

With reference to Cheshire East Local Plan Strategy Green Belt Policy PG3 (Paragraph 3), it should be questioned whether the construction of new buildings on the site qualifies as an exception to 'inappropriate' development as outlined in the NPPF Section 13 Paragraph 145.g (redevelopment of previously developed land). It should be questioned whether the whole of the former quarry qualifies as 'previously developed' given the NPPF definition of previously developed land as 'land which was occupied by a permanent structure, including the curtilage' but that 'it should not be assumed that the whole of the curtilage should be developed'. This is particularly relevant as the site photographs submitted with the application show that much of the curtilage of the former quarry appears to 'have blended into the landscape', another exclusion in the definition of 'previously developed'.

Very Special Circumstances

Therefore, with reference to Cheshire East Local Plan Strategy Green Belt Policy PG3 (Paragraph 2) and Macclesfield Borough Council Local Plan Saved Policy GC1, consideration should be given to whether the development is 'inappropriate' given that 'very special circumstances' as outlined by the NPPF (Section 13 Paragraph 144) 'will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.' RPC questions whether the harm to the Green Belt, as outlined in various sections of this response document, can be outweighed by the weight given to the economic benefits of the potential future tourism proposals.

Sustainable Development

Given various other environmental concerns listed in this document, (in particular the risk to existing groundwater supplies), serious consideration should be given as to whether the proposals satisfy the environmental objective of sustainable development outlined in Section 2 Paragraphs 8c of the NPPF, specifically with reference to protecting and enhancing our natural, built and historic environment; helping to improve biodiversity.

Furthermore, with specific reference to phase 2 of the proposals (tourism lodges), the proposals include no details of renewable energy technologies, energy efficient design or anything similar (such as rainwater harvesting) that might address Section 2 Paragraphs 8c of the NPPF requirement of 'using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'

Use Class

RPC is concerned at the open-ended nature of the proposed use class 'other tourist accommodation'. RPC is concerned that the site may be developed into a different use in future if the application is approved and feel restrictions should be imposed to restrict the site for short term holiday accommodation.

5. Landscape and Visual

The NPPF Section 12 Paragraph 127 outlines that developments should be 'visually attractive as a result of good architecture and be 'sympathetic to local character and history, including the surrounding built environment'. Section 6 Paragraph 83(c) of the NPPF requires tourism proposals to 'respect the character of the countryside'. Due to the site's location within an Area of Special County Value, Macclesfield Borough Council Local Plan Saved Policy NE.1 protects it from development which is likely to have an adverse effect on its character and appearance and does not qualify how adverse this effect must be.

RPC is concerned that the many conclusions the application makes about the lack of visual effect of the application are made from inaccurate assumptions that the proposals will be screened by existing trees.

RPC is concerned that the chosen method of visual impact assessment is inadequate and does not show the proposed scenario. RPC is concerned that the lack of detail and regard for locality in the proposals, would mean they have an adverse effect of the character and appearance of the area.

Visual Impact Assessment Inadequacies

The Environmental Statement states that 'no significant effects on views or visual amenity have been identified ... in the long term when the site ... is operational as the proposed tourism use'. However this conclusion is undermined by deficiencies in the Landscape and Visual Impact Assessment (LVIA) and Zone of Theoretical Visibility (ZTV) studies from which this conclusion is made.

The Environmental Statement (Paragraphs 6.57 and 6.158) notes that the ZTV diagrams assume an 8m high screen provided by existing trees on the eastern side of the site, restricting any view of the lodges. However examination of the contours on ES Figures 1.3 and 1.4 (Master Plan and Sections) show that almost all of these existing trees are more than 8m lower than the 384m finished-fill-level that is proposed for the base of the lodge buildings, meaning that the lodges will be largely unscreened by the existing trees. No obvious specification (heights) or planting programme is provided for the new trees to guarantee that these will provide any screening. Subsequent claims and conclusions reached from the LVIA and ZTV studies throughout the document that the proposals will be screened should be dismissed.

Additionally, the LVIA only includes photographs of the existing site. For a development of this scale and prominence, an Annotated Viewpoint Photography method for a Visual Impact Assessment is inadequate, particularly given the lack of screening. It shows nothing of the proposals in situ and makes any visual effect the lodges have on the character area impossible to establish.

A Scale Verifiable Photo Montage method would provide a better indication of the proposed scenario for comparison. This should include the impact of realistic tourism paraphernalia such as guest's vehicles. From reviewing the ZTV diagrams it is also unclear why a view was not taken from a location within the highest visibility zone, (such as on Charity Lane but closer to the site than viewpoint 7). It is suggested that this should be included in a revised LVIA.

The Environmental Statement quotes one of the special qualities of the Peak District as being 'dark night skies', yet the LVIA fails to make an assessment of the proposals at night. The light pollution from lodges, site lighting, guest activities and guest vehicles is not considered nor obviously specified in the application and would contribute to the negative effect the proposals would have on the character of the area. This too should be included in a revised LVIA. The Environmental Statement states that the proposals are not in a visually prominent location however views 3, 4, 5 7 & 8 (all taken from within the Peak District National Park) look down into the quarry to some extent. Although the quarry is part of a panoramic view from the more distant easterly locations, its topography as the last significant protrusion against the backdrop of the Cheshire plain makes it visually prominent. As such its contribution to the character of the wider area should not be dismissed.

Adverse Effect on Character: Quality of the Setting and Local Distinctiveness

The Environmental Statement (Paragraphs 6.54-6.56) references four documents which define the character of the area:

1. The National Character Area Profile 53 for the South West Peak, defines the settlement pattern as 'dispersed, with small settlements' and 'predominantly built with local stone'.
2. The Cheshire East Landscape Character Assessment defines the development site as within Upland Fringe and identifies issues affecting the character including; loss of tranquillity due to recreational pressures, 'holiday cabin developments' and 'the loss of vernacular materials and features'.
3. The site is outside the Peak District Landscape Strategy and Action Plan however the document extends beyond the boundaries of the national park and identifies the site as within Slopes and Valleys with Woodland. This again makes reference to dispersed settlement, loose clusters of dwellings and buildings constructed of local gritstones.
4. The Cheshire East Local Landscape Designation Review identifies 'a sense of remoteness' as one of the Peak Fringe's 'special qualities' and adds that 'local materials add a sense of place' also referencing 'stone walls' and 'dispersed settlements'.

Quality of the Setting

RPC questions whether the proposals comply with Macclesfield Borough Council Local Plan Saved Policy DC8 and enhance the quality of the setting.

The four documents above all refer to characteristics such as dispersed settlements, tranquillity and remoteness, with holiday cabin developments specifically identified as an issue affecting character. It is clear then that a tourism lodge development of this density would threaten the existing character whether visible or not.

Additionally, the LVIA Methodology Statement included in the application also refers to existing experiential characteristics such as wildness and tranquillity. The Environmental Statement (Paragraph 6.107) then claims that the overall transformation of the quarry would be an enhancement citing specifically that the 'current unkempt appearance' would 'become ordered' and 'landscape maintenance activities would enhance the character of the quarry'. This proposed description is contradictory to the aforementioned wild character of the existing landscape.

Local Distinctiveness

RPC questions whether the proposals would conserve and enhance the landscape character and contribute to local distinctiveness in accordance with Cheshire East Local Plan Strategy SE 4.

The application is too sparse on the detail of the lodges, tipis, reception building and adventure play area (which occupies a prominent position on the site). There are no plans or elevations submitted for the tipis or adventure playground and no specific details of materials for the buildings. The Environmental Statement (Paragraph 6.118) states that the local vernacular of stone and slate is unaffected, yet the application does not specify materials showing a lack of consideration for the vernacular. The assumption that materials can be agreed by condition makes it impossible to determine their effect on the character of the area as defined by the four documents above (all of which reference materials) and reveals an underlying disregard for local distinctiveness.

The Environmental Statement (Paragraph 6.107) acknowledges that the 'lodges are not in keeping with local vernacular'. Despite this it concludes that the effects of the lodges would be barely perceptible having only a minor effect on the character of the area, reasoning they should be treated in isolation to the wider vernacular due to being visually enclosed within the quarry. However, there is no policy allowance for different treatment for visually enclosed buildings within Macclesfield Borough Council Local Plan Saved Policy NE.1 which states it appropriate to prevent development which does not respect the character of areas of special county value. Furthermore the conclusion that the lodges are visually concealed is based on and inadequacies of the LVIA and the inaccuracies of the ZTV which are exposed above. Additionally, the buildings would be visible views from the proposed routes through the site.

5. Ecology

There are 8 habitats of Principle Importance (also known as priority habitats) as listed under section 41 of the NERC Act / UK Biodiversity Action Plan within 2 km of the site. There are 3 such priority sites within the site itself (see section 3.2 of the Habitat and Species Baseline document). Interestingly, air quality impacts associated with the proposed developments on ecological receptors have been scoped out of the ES, as it is stated that the closest ecological area of interest is 3km from the site. However, Macclesfield Forest is 1.2 km SE, Vale Royal (Peak Park) Local Wildlife site is 300m N and Teggs Nose country park is even closer. The South Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA), European designated, is within 3.2km of the site boundary. This area is of importance because it supports golden plover, merlin, peregrine, short eared owl and dunlin. The Moors are also a designated Site of Special Scientific Interest (SSSI).

The lowland dry heathland and lowland acid grass lands identified on site are habitats of principle importance and as the ecological surveys indicate they need to be retained. 174 species of invertebrate were identified in the survey, some of national status. The large number of pollinators are supported by the wide resource of flowering plants. Butterfly resources on site are particularly significant, with 14 species recorded in surveys, including two NERC Act Section 41 species - the dingy skipper and small heath, confirming the importance of this local wildlife site. The site is also rich in bees and wasps which like the other invertebrate species thrive on the current mosaic of habitats. The site currently works as an interconnected mosaic of habitats and features, allowing survival of a rich invertebrate fauna, many of which require such closely approximated features to thrive. The site is considered by the surveyors to be of County (medium) Importance and not one of lower status.

The survey records that the site is a good breeding site for a range of birds and significant numbers were observed in the brief study, with the effects of the proposal on Willow Warblers of particular concern. Clearly a range of other birds including buzzard, owl, lapwing, curlew are likely regular users of the site for foraging and have been regularly observed by neighbours. Although no bat roosts were found in the survey it is clear that bats also fly through this area foraging on a regular basis. Again while no badger setts were identified in the brief survey, which was unable to penetrate all areas of the site, it is almost certain that the area is included in the local badger population territory. Red deer, foxes, hares, rabbits, stoats and weasels are also regular visitors of this and the immediate surrounding areas but have not been recorded in any of the surveys. Unfortunately, there has also been no study of resident small mammal populations on site, which would have been much easier to complete with appropriate traps. It would be expected that voles, mice and shrews would be plentiful in this rich nutrient environment, which also affords a lot of cover. Not surprisingly, no evidence of reptiles were found because of their shyness, though it is surprising that no amphibians were recorded.

The surveys conclude that the construction phase will impact the valuable habitats identified on the site, with likely deleterious effects on the surrounding reserves as a result of noise, dust, pollutants as well as the shear destruction of large parts of the site by landfill. The proposed works will result in the loss of suitable territories for breeding and foraging for the range of invertebrates and vertebrates identified and loss of the important plant habitats and wide range of flowering plants. It is difficult to understand how any mitigation plans for the site works will be put in place. Many of the species present are associated with early successional mosaics, regular interventions will be required to suppress succession, reinvigorate pioneer plants species and retain open bare ground, using on-site substrates. Any plans must be in place over a long period (years) to be effective. The proposals both initial landfill and possible holiday home development are clearly major threats to this valuable and significant ecological resource, threatening its immediate and longer term existence. Clearly if holiday homes are built then consideration of the effects on the fauna of noise, light, dogs and intrusion on site flora habitats by a large number of people and pets will need to be considered. These considerations also obviously extend to the environments of all the immediate neighbouring properties.

The use of imported material for landfill creates a number of ecological risks:

- The introduction of new soil types to the area, upsetting the ecological balance;
- The import of invasive non-native or non-indigenous species; and
- The import of diseases, such as that affecting the larch plantations near the Lamaload reservoir

This response is based upon the information provided in the applications and their supporting documents. We have also listened to the concerns of those neighbouring the Walker Barn site. As noted in one of the sequential surveys some areas of habitat have already been lost as a result of ongoing activity at the site. This is also a concern expressed by neighbours overlooking the area. In the application it is stated that part of the land has suspected contamination. It will be very important to identify this and assess its importance for the ecology and the local residents and possible future holiday makers.

6. Noise

RPC is not in a position to challenge the measured figures taken by Miller Goodall as it lacks the resources for independent surveys. However, RPC finds the difference between LAeq,1hour (The A weighted continuous sound

level), LA90 (The A weighted sound level just exceeded for 90% of the measurement period and calculated by statistical analysis) and LA max (Max sound level) improbable.

If the average between the four receptors is 61db and the max is 77db RPC (average figures from Table 8.6 of the ES) cannot accept the claim that the level just exceeded for 90% of the time is 40db.

It is the LA90 that goes forward to identify the criteria from PPG minerals (Planning Practice Guidance). 10db is then added to this to give worst case assessment giving 50db. The predicted noise level at Phase 1 averages 34db and this results in the Significance of Effect as "Not Significant"

In appendix 8.1 the noise levels of the vehicles to be used in the quarry during reprofiling.

- 2 x wheeled excavators 93.9 dbA
- 1 dozer 108.7dbA
- HGVs 4/hr 108.1dbA
- Dump trucks 107.0dbA.

RPC note that noise during the tourism phase has been ‘scoped out’ of the assessment, yet this appear to be based purely upon the traffic figures. As noted elsewhere, this site is in a sensitive location in the Green Belt adjacent to the Peak District National Park and this area is important for it peace, tranquillity and wildlife. No information is provided as to how this peace, tranquillity and wildlife will be protected from activities taking place during the tourism phase, concerns raised by RPC and local residents include:

- Activities in the meeting rooms indicated in the site reception building, which may include loud music, fireworks etc;
- Open air activities organised by groups of visitors such as music events;
- Hours of operation of activities on site;
- Potential presence of bars or shops on site; and
- Noise from the proposed play area, which is located very close to neighbouring properties.

Conclusions

The phase 1 average noise level of 34db is not credible. To put this into some kind of context this would be equivalent to standing 1m away from a laptop.

The original average noise level of 61db is mainly generated by cars, lorries and motorbikes. It should be considered that those travelling from Buxton are likely to be coasting and if travelling from Macclesfield are on a level after climbing. The lorries entering the quarry will be climbing when loaded and the machinery in the quarry will be working at various loads therefore varying noise levels. Therefore, RPC does not believe that noise levels are going to drop to those predicted within a kilometre and would expect levels to be around 60dbA.

In the summer around the centre of Rainow village if a tractor is in the fields it can clearly be heard some distance away. Therefore, the noise from the reprofiling will be clearly discernible especially as it will be intermittent and varying and thus very noticeable.

The ‘Planning Practice Guidance – Air Quality’ acknowledges that: "the subjective nature of noise means that there is not a simple relationship between noise levels and the impact on those affected. This will depend on how various factors combine in any particular situation"

Within the Air Quality section there is reference to the use of rumble strips on the access track, there is no consideration to the noise/annoyance level caused by this.

7. Air Quality

Having examined the criteria used to evaluate dust emissions RPC believes that they are constructed in such a way as to make it hard to object on the evidence given. The range between large and small dust emission magnitude is too great and there should be a medium class added.

For instance, within the Site Prep & Restoration for small magnitude the volume of material should be <20,000M3 but for a large magnitude it should be >100,000M3. As there is nothing in-between the tendency is to go for a small magnitude.

RPC has listed below instances where the limit for small magnitude has been surpassed or the criteria ignored.

Site preparation and restoration	Justification for small magnitude	Justification given
Volume of material	<20,000M ³	This site will be more but no figure given
Dust potential of material	Material with high water content	No mention of this just states clean material, what does this mean if from a building site ?

Material handling		
Dust potential of material	Coarse material and/or high water content	Not answered
On Site Transportation		
Length of Haul Road	<500m	Not answered, is it?
Stockpiles		
Term of stockpile	<1 month	Not answered
Frequency of material transfer	Weekly	Not answered
Dust potential	As above	Stockpiles will be dampened. Area of stockpile <2.5ha
Wind speed	Low	Not answered
Off Site Transportation		
Nº of HDV movements	<25/day	38/day, mitigation: below the >200/day in the large magnitude.
Cleaning Facilities	Effective cleaning with road sweeper	Access road to be cleaned regularly. Wheel washing system and rumble strips
Wind Speed	Low	Not answered

Section 9.59 of the ES states the wind speed to be between 0.5 - 3.6 m/s. Table 9.6 is used to determine the frequency of dusty winds. For infrequent the criteria is >5m/s from the direction of the dust source on dry days are less than 5%. For moderately frequent it is between 5 & 12%. Both these categories are used in the calculations. Looking at fig 9.4 (Wind direction and strength distribution) RPC estimates that the wind strength is between 3.6 -11.3 m/s for 39% of the year which appears to be excluded in the 3.6m/s maximum given in the ES.

It is noted that during the noise measurement the wind strength was measured at approximately 5m/s.

Conclusions

Stockpiles, which will contribute to dust magnitude seem to be underplayed. A small magnitude stockpile should be for less than 1 week, this will be a two year process therefore this criteria will not be met. The ES states that an "inert material processing area" is the material storage area before it is used to infill the quarry, this suggests 2 or more piles. The ES states that the piles will be dampened or covered but as to size they state <2.5ha. These therefore could potentially be quite large stockpiles. If dampened where is the water coming from based on the concerns expressed elsewhere in this document regarding water supplies? This question also applies to the mitigation for road cleaning and wheel washing.

RPC believes that wind strength as also been played down. Councillors with experience of working in close proximity to similar areas in the past have seen that processes such as wheel washing and dampening down can make the situation worst as these spread mud across the area which then dries and causes even more dust.

8. Traffic and Transport

Summary

RPC note the traffic information provided in the ES and the supporting Transport Note. Whilst recognising the assessment has been undertaken in accordance with guidance, RPC are concerned that it does not take account of the particular circumstances pertaining to the New Buxton Road, nor adjacent local roads such as Old Buxton Road and Bull Hill Lane. RPC is very concerned that there are no proposals for sustainable travel associated with the site, despite the very close proximity of walking, cycling and public transport facilities. Given the emphasis upon sustainable development stressed in the review of current planning policies given in the ES, RPC consider it totally unacceptable that there is no provision whatsoever in the application for sustainable travel and that all access to and from the site is assumed to be by motorised transport.

Vehicular traffic and access

The A537 Buxton New Road is generally identified as one of the most dangerous roads in the country in terms of its accident statistics. This is in large part due to motorcyclist activity during weekend periods. The additional traffic

created by the proposal, together with priority junction access to the A537 Buxton New Road and the weekend safety record for that road create a significant safety risk that has not been assessed. The speed assessment presented in the ES and Transport Note is based upon weekday figures when average speeds will be depressed by the volume of goods vehicle traffic, with many slow moving goods vehicles associated with quarrying in the Buxton area. A further speed assessment should be undertaken during a summer weekend, when both average and maximum speeds will be much higher, to determine whether sight distances are sufficient with higher speeds on Buxton New Road. This will be particularly important to properly assess the safety of the access to and from the site in the proposed tourism use phase, with peak site traffic on summer weekends likely to combine with peak traffic and speeds on the New Buxton Road. We also note from the ES that it is assumed that the landfill operation will take place 6 days/week, thus goods vehicle access will take place on summer weekend days, coinciding with peak traffic speeds and thus maximum risk of vehicle conflicts and accidents. Further, assessment should be based on the assumption that the proposed improvements for the junction between the site access and the A537 are not deliverable due to the land ownership issue discussed later in this section.

RPC note that this section of New Buxton Road is one of a limited number of sections in this area where overtaking is permitted in both directions. This will create an additional hazard at the site access, both for vehicles leaving the site and those waiting to turn right into the site.

We also note that no assessment has been undertaken of the safety risk at the Buxton New Road/Buxton Old Road junction at Walker Barn near the former Setter Dog. RPC believe that a significant proportion of traffic to and from the tourism development will use this junction and Buxton New Road to access Macclesfield and further afield, as well as the Tegg's Nose country park. This junction has very poor visibility in each direction and additional traffic, especially that turning right from the New Buxton Road into the Old Buxton Road (as would be the case for traffic from the proposed development), would create a significant safety risk with vehicles waiting to perform that right turn being particularly at risk.

As noted above, RPC believe that a significant proportion of the traffic to and from the site during the tourism use phase will use the Buxton Old Road. A check using Google Maps route option shows this to be the recommended route between the site entrance and the junction of the A537 and A523 in Macclesfield (being faster and shorter than using the A537 Buxton New Road), so this is likely to be the recommended route by SatNav systems. The Buxton Old Road is of much lower standard than the A537 and has a narrow single lane section between Windyway and the entrance to Tegg's Nose. No assessment has been undertaken of the impact of this additional traffic upon the Buxton Old Road.

Similarly, Bull Hill Lane is likely to be used by traffic between the development and the northern (Dark Peak) areas of the Peak District via the B5470 and Whaley Bridge during the tourism phase. Bull Hill lane is a narrow mostly single lane road with few passing places and passing through farm buildings. Any additional traffic on this road is highly undesirable and a safety risk, particularly for walkers and the local farmer.

Sustainable transport: Walking, cycling and public transport

RPC note that no assessment has been undertaken of pedestrian and cycle access to and from the site nor any measures proposed to facilitate such non-motorised access. The ES places significant emphasis on the policy directives towards 'sustainable development' and use of sustainable transport modes (walking, cycling and public transport) but the ES section on 'Sustainable Travel' is a single paragraph that simply notes that there are no footways on the A537 close to the site, no cycle facilities on the A537 and no bus stops within 400m. This is incorrect, there is a footway on the north side of the A537 throughout from Macclesfield past the site as far as the former Setter Dog public house at Walker Barn and there are bus stops in each direction by the Crookedyard Road junction at Walker Barn (250m from the site entrance, see the Cheshire East Council public map viewer) served by the route between Macclesfield and Buxton which is operated hourly in each direction Monday to Saturday. In addition there is an extensive, well signed and documented footpath network in the area (Rainow Parish alone has more than 50 miles of paths and a dedicated path map available from local outlets) including the long-distance 'Gritstone Trail' that passes close to the west of the site. There are good facilities for walking, climbing and other activities at the nearby Tegg's Nose country park and the 'Grit and Gears' cycle trail that starts at Tegg's Nose.

RPC consider that a proper assessment should be undertaken of the potential for a policy consistent sustainable development to be undertaken that addresses how a tourism development in this location could be properly integrated with the existing facilities for sustainable leisure activities. This will need to address a number of issues in order to provide safe sustainable access to and from the site, including:

- Addressing the issue of the single lane track access to and from the A537 which will not provide for safe separation between vehicles and non-motorised users;
- Providing a safe route to and from the existing regular bus service between Macclesfield and Buxton, either using the existing stop at Walker Barn or providing a new stop closer to the site;

- Providing a safe route to the Tegg's Nose country park. This will need to address the issue of the narrow single-track section of the Buxton Old Road between Windyway and Tegg's Nose, which lacks space for a footway being closely bounded by dry stone walls; and
- Providing a safe connection to the local footpath network, in particular the long-distance Gritstone Trail.

The absence of such safe routes is likely to lead to consequent negative impacts such as excess demand for parking at Tegg's Nose and use of cars to access the local path networks, in both cases leading to the potential for increased parking on narrow local lanes.

Proposed mitigation

RPC note that the only transport mitigation proposed by the applicant is a minor improvement at the junction of the site access with the New Buxton Road together with widening of the site access.

We have been informed by the neighbouring landowner that the quarry ownership only includes the narrow width of the access track and not the adjacent land and this has been confirmed through sight of the relevant Land Registry mapping. Thus neither the proposed improvement at the junction nor the widening of the access track will be deliverable without the cooperation of the neighbouring landowner, who is objecting to the development. RPC note that whilst not referred to in the Transport section of the ES, the Transport Note does refer to '*the assumed land ownership boundary*' and '*we recommend the ownership records are checked*', thus confirming the applicant's awareness of the potential lack of ownership and that the improvements may not be deliverable.

Without the proposed mitigation the site will have a very narrow single lane access track with no passing places and a poor standard junction with the New Buxton Road. This will be a concern during both the landfill and tourism uses of the site. During the landfill phase the junction would be particularly difficult for goods vehicles entering from the Buxton direction, these vehicles would need to cross to the wrong side of the road in order to make the turn into the site, with resulting conflicts with opposing traffic from the Macclesfield direction. The continued use of the single lane access track will lead to the potential for vehicles to have to wait on, or reverse back onto, the A537 to allow for exiting traffic.

9. Water Environment

There is no proposal on how to deal with sewage and wastewater arising from the tourism use of the development. i.e. Phase 2

The flood risk assessment is for a 1: 100-year storm + 40% allowance for climate change.

Surface water disposal

A desk study has been carried out as part of the report and establishes that a maximum run-off of 11.3 l/sec needs to be achieved, this would require a storage capacity on site of 72- 128 m³. The stated preferred way to deal with this for the Quarry 1 area is for a planted swale to carry a restricted discharge via a Hydrobrake to the existing discharge point to the east of the access road into a stone filled gully which is within the boundary of the land owned by the applicant. This is shown as being on the site boundary with no explanation of whether this would be sufficient to deal with the permitted outflow of 11.3 l/sec and the consequence if not. This to be combined with permeable surfaces to the car park, roads and paths and soakaway trenches either side of the access road to the North.

The alternative proposal is for a sub-surface drain to pass along the route of the access road and discharge into the main drainage system on Buxton New Road (A537).

Quarry 2 area is proposed to be dealt with without any attenuation and to continue to 'infiltrate' as it currently does.

The question of contaminated surface water is not considered here which may occur during the tourism use stage (Phase 2).

The surface water is said to migrate through the permeable ground into a combination of an un-named river 180m North of the site which flows NW to meet the Dean 2.3 km North of the site and the Bollin (the source of which is said to be 150m East of the site) which flows South to Teggs Nose Reservoir.

The unknown status of the access road is a problem. Its width, which is already quite narrow, is restricted by private land either side according to adjacent owners. To widen and improve it would involve permission from the owners of this land, who are currently objecting to this application. This will affect the alternative surface water discharge method and access for spoil trucks.

Wastewater disposal

All of the above deals only with the question of surface water disposal and not of wastewater disposal. With 31 dwellings plus 5 Tipis the water requirements and disposal of waste, given there is no mains sewer system within the site, does amount to a serious issue. Figures do vary across water authorities but a common figure used is that on average we use 170 litres per person per day.

If we assume that each dwelling on site during the operational stage has an average of 2.5 people in occupation during the holiday season then the fresh water requirement for the operation is in the order of $2.5 \times 170 \times 36 = 15300$ litres /day (15.3m³ /d) This is a significant amount and peak demand will be in the summer months when the aquifers are probably at their lowest capacity.

There is no mention of a sewage treatment plant so we assume a system of septic tanks will be used. How will foul water arising from these be dealt with? Approximate figures for 36 dwellings show that 13,500 litres/day (13.5 m³/day) day would need to be dealt with.

Water supply

Water provision to the site is problematic. Paragraphs 11.45 and 11.46 of the EIS states that there are no licensed ground water extractions within the site but a total of 23 within 2 km of the site, the nearest being 182m East, Walker Barn Farm. For surface water extraction there is only 1 licensed extraction within 2 km of the site, Brocklehurst Fabrics. This is at odds with Table 7 which follows paragraph 11.105 and which says that there are 'No licensed groundwater extractions within 1 km of the Site'.

The ES takes no account of the water supply to a pair of reservoirs at Bull Hill Farm, this supply is piped from the direction of the Walker Barn quarry. These reservoirs provide the only water supply to Bull Hill Farm and also supply Marsh Farm.

All of the properties in this area rely on ground water extraction for their domestic supply and a common problem is of wells /boreholes and the Bull Hill reservoirs running dry in the summer months.

There is no evidence within the documents to show that the water requirement in the operational stage (Phase 2) will not worsen what is already a difficult issue for residents living near the site.

The aquifers beneath the site are described on the BGS map entitled Groundwater Vulnerability as Minor Aquifer of Variable Permeability. This in itself could explain why the supply to local residents can fail from time to time. The EIA (paragraph 11.31, see also paragraph 12.90) describes the groundwater vulnerability as 'high'.

Conclusions

How will this development affect the domestic water supply to local residents who already have concerns about continuity of supply particularly during the summer months when the holiday season is at its height and the Lodges fully occupied?

How will the wastewater and sewage arising from 36 new dwellings be dealt with?

Will the quality of the imported soil be what the reports say it would be and how can the residents be sure that this material will not lead to contamination of the aquifer and thus their water supplies?

10. Geology, Land and Soils

The quarry dates back to the late 19th century. It is situated within the Carboniferous Millstone Grit series and the Roaches Grit Sandstone which lay over the site was the material that was quarried until it was exhausted, mainly for building stone.

The quarry is in two parts Q1 & Q2, Q1 being the main area of operations. These left a large void which the proposal seeks to 're-profile'.

The proposal to achieve a finished level of 386 AOD across the site is to import 75,000 tonnes of 'clean inert natural soil' arising from building sites both local and elsewhere. This involves raising the existing levels in two phases by up to 10m. The existing steel structures and stockpiled materials would be removed prior to the infilling operation.

It is said that this will be controlled by the implementation of a MMP (Materials Management Plan) and that this plan would be revised for each new source of the material. It's not clear how this will be monitored and tested nor by who and what remedial action would be applied should this fail and result in unacceptable materials being delivered to the site.

The EPA (Environmental Protection Act) 1990 calls for testing of all materials for contamination and suitability for use prior to being brought to the site. It's not clear where this will be done and by who or how.

11. Community Impacts

In addition to the numerous concerns with the contents of the ES report highlighted above, the RPC would like to address the impact these concerns and this development are likely to have on the community of Walker Barn specifically and of Rainow in general.

The RPC held an extraordinary meeting on November 24th 2020, which was attended by 9 households impacted by the proposed development. An additional household supplied representation after the meeting. None of these households, which are in very close proximity to the development site, received any consultation document. The lack of consultation with these households on the statistics used in the ES report have been discussed previously in this response, however a further effect of this omission is to leave these residents very little time to respond formally to a very lengthy, technical and detailed suite of documents relating to the application.

Numerous concerns of these residents have been previously considered in the ES and rebutted in this response, namely:

- Demand on services, particularly water supplies and waste water;
- The danger posed by both the development phase (1) and the tourism phase (2) on Buxton New Road, already known widely as one of the most dangerous roads in Britain;
- The hours of operation and the resulting noise and light pollution affecting the amenity of local properties;
- The landscaping and visual impact on the amenity value of their properties;

- The ecological impact of the development, as the residents are accustomed to living in a very diverse ecological landscape and highly value this aspect of the area, and
- Noise and air quality impacts, particularly of phase 1.

The residents have further concerns that have not been addressed by the ES document that also have wider impacts on the community of Rainow. Firstly, it is unclear whether the lodges will be limited to short term occupation or whether longer term letting will also be possible. 31 additional dwellings (tipi's have been excluded as they are likely to provide short term accommodation only) represents a 6% increase in the number of dwellings in Rainow and could lead to approximately an additional 134 people in the area per week during the summer. This is a significant strain on the resources of the area.

The area is already a haven for walkers and cyclists for which there is good provision of footpaths, bridleways, etc however when the area experiences a significant increase in non-local visitors, as has happened during the current pandemic, there is, unfortunately, an increase in many unwanted behaviours such as, but not limited to:

- Trespass and security incidents;
- Littering;
- Anti-social behaviour;
- Damage to residents' properties i.e. to drystone walls, fences, gates, etc;
- An increase in sheep-worrying and attacks by dogs on livestock;
- Increases in incorrect usage of infrastructure i.e. bikers using footpaths leading to erosion and making the footpaths impassable, and
- Leaving gates open.

Many of the more rural residents, i.e. outside of the centre of the village, who will be directly impacted by these behaviours, in addition to the direct neighbours previously mentioned, did not receive the consultation document. It is also worth noting that any cost associated with repairing the results of these behaviours, i.e. repairing walls, footpaths, fences, etc, falls to the landowner. Walker Barn Chapel is in the immediate vicinity of the development and could be targeted by any anti-social behaviour jeopardising a local historical building. These behaviours also result in increasing demand upon the already stretched Police (local provision and the Rural Crime Team) and Council provision, for which the local community pay.

Beyond these security fears, the local residents note that with 7,400 lorries movements over 2 years on a 6 day working week equates to 15 loads per day which, over an 8 hour working day, is 2 lorries per hour. That is a significant increase in road movements, particularly when turning across the A537 onto the site at an already dangerous section. It will also undoubtedly bring a large amount of additional dirt onto the carriageway, particularly when lorries are leaving the site. It is well-documented that excess dirt on road surfaces significantly increases the accident potential on that road, and this would be exacerbated during the winter. Any surface run-off onto the road would have the same effect.

In conclusion, a significant proportion of the local population has many major concerns over the impact of both the reprofiling phase 1 and the longer term phase 2 development of the tourist lodges. We ask that these concerns are given considerable weight, irrespective of and in addition to any individual objection by the residents, allowing for the fact that many of the immediate neighbours are elderly and do not necessarily have access to or the ability to comment through the website individually.

