

## Objections to Valley of Stone - Proposed Shared-Use Cycleway, Bacup Road

### 1. Objections

- We consider the proposals to be an attempt to squeeze a shared cycleway into an area that is unsuitable. We question whether the proposals fully conform with the recommendations of the Department for Transport Local Transport Note 1/20 (Cycle Infrastructure Design) dated July 2020 (LTN 1/20). See paragraphs 4.1 to 4.7 for more details.
- The detriment to residents, particularly of 601, 603, 605 and 607 Bacup Road, outweighs the benefit to the small number of cyclists who use this stretch of the Valley of Stone cycleway.
- We consider that the planners should accept that, despite their best efforts over a considerable length of time, there is currently no satisfactory solution to the “Buckhurst Plant Gap”.
- We consider that it would be better to leave things as they are, until circumstances change, rather than spend money on an imperfect and ineffective plan.

### 2. Background Information

- 2.1 For ease of comprehension we use the terms “we” or “our” in this document to refer to the knowledge, experience, or opinions of either one or both of us. We are both agreed on the content of this document.
- 2.2 We are the occupiers and owners of [REDACTED] Bacup Road which is one of the properties directly affected by the proposals. We have owned the property since October 2019. We have a close association with the property and knowledge of the area since January 1970.
- 2.3 We responded in detail to the previous proposals for a shared cycleway in March 2020 and to a subsequent proposed parking notice in February 2021.
- 2.4 In our previous responses we asked many questions with the hope of gaining a better understanding of the background to the proposals but we did not receive any answers.
- 2.5 Between July and August 2022 we submitted a series of requests for information about the background to proposals for a shared cycleway under the Freedom of Information Act. We have used the information received in the reply to our requests to assist our response to the latest (January 2023) proposals. We recognise that the current proposals are those given in drawing reference VOS-03-007 dated June 2022 which we received in response to our Freedom of Information (FOI) requests.
- 2.6 We are aware of the difficulties created by the “Buckhurst Plant Gap” in the creation of the Valley of Stone Cycle Route. We have read the original report on “The Valley of Stone Greenway: a Rossendale and Rochdale Railway Path and Cycleway” by John Grimshaw Associates dated October 2013. We have assumed that this report marks the start of the project.
- 2.7 We appreciate the amount of effort that has been put into attempts to resolve the “Buckhurst Plant Gap”. The documents that we obtained in response to our FOI requests has allowed us to see the evolution of the plans to bridge the “Buckhurst Plant Gap”. We appreciate that many attempts have been made to design a cycle route that avoids the creation of a shared use cycleway.

2.8 We have read the relevant parts of LTN 1/20 which we understand to be the current appropriate guideline relevant to proposals for shared cycleways. In particular, we have read section 5, 6 and 8 of LTN 1/20. We understand that LTN 1/20 contains recommendations rather than requirements and that there is scope for the proposals to specify features that do not meet the minimum recommendations of LTN 1/20. However, we have noted that Active Travel England, once it formally becomes an executive agency, will take LTN 1/20 as a standard that must be met in order to receive and continue funding for projects. We assume that funding for the proposed cycleway is already in place and that failure to meet the requirements of LTN 1/20 is not perceived as a risk.

### **3. Observations of the current situation**

3.1 We were surprised and disappointed that a comprehensive, or indeed any, survey of the use of the footway and adjacent road was not available to us in response to our FOI request for information relating to proposed cycleway. We acknowledge that we cannot rule out that such a survey was done before the earliest date of our request (January 2016), was done after the final date of our request (July 2022) or that the response to our FOI requests were incomplete. We can provide our own observations of the use of the footway and road as our house is less than 2m from the footway and less than 4m from the road. Indeed, as I am typing this document I am watching the traffic and users of the footway passing by. Our purpose in providing this information is to give the reader of this document an opportunity to gain an understanding of the basis on which we have formed our opinions.

#### **3.2 The footway**

3.2.1 The footway is the main pedestrian route between Waterfoot and Rawtenstall; the only alternative pedestrian route is via Newchurch (which is a long detour).

3.2.2 It takes between one and two minutes to walk along the stretch of footway on the south side of the A681 road affected by the proposals.

3.2.3 Pedestrians use the footway on the south side of the road more frequently than the one on the north side of the road. The footway on the north side of the road is narrower than on the south side and in parts barely allows single file use. There are limited opportunities for pedestrians to swap between the footways on the north and south sides of the road as there are no safe crossing points for pedestrians between Cloughfold and the centre of Waterfoot.

3.2.4 The users of the footway on the south side of the road include:

- Pedestrians, including:
  - Residents of the immediate and surrounding areas, including:
    - elderly people
    - schoolchildren
    - family groups with children
    - adults with pushchairs
  - dog walkers
  - people who work in the immediate area
  - recreational walkers
- Runners, including:
  - joggers
  - athletes on training runs

- Cyclists (see paragraphs 3.5.2 to 3.5.6)
- people on mobility scooters
- people in wheelchairs
- sheep (normally just after the lambing season)

3.2.5 The timing and frequency of use of the south side footway by pedestrians varies considerably:

- Although it would be incorrect to describe the footway as busy (like a street in a town centre) it is used frequently and routinely.
- On Mondays to Fridays the busiest times for pedestrians are from 07-30 to 09-00, 11-30 to 14-00 and 15-00 to 17-30.
- Most of the recreational use by walkers and runners is concentrated on Saturdays and particularly Sundays.
- During the various “lockdowns” of the pandemic there was an increase of recreational use on Mondays to Fridays but the recreational use seems to have settled back to the pre-pandemic pattern.

### **3.3 The road**

3.3.1 The stretch of Bacup Road (A681) affected by the proposals is about 160 metres long.

3.3.2 The road is used by:

- cars
- motorcycles
- heavy goods vehicles
- buses
- coaches
- emergency vehicles
- farm vehicles
- construction vehicles
- cyclists
- mobility scooters
- riders on horseback
- horse and traps
- sheep (normally shortly after the lambing season)

3.3.3 A considerable number of heavy goods vehicles use the stretch of road:

- Large construction vehicles from the Buckhurst Plant Hire premises join and leave this road along the south side of this stretch.
- Heavy good vehicles frequently turn/reverse into/out of the Dominion Colour Corporation premises (formerly Gemini Dispersions) on Holt Mill Road.
- Deliveries/collections are made by heavy goods vehicles to the North West Timber yard and LJ & R Wholesale Footwear premises on the north side of the affected stretch of road.
- Occasional deliveries/collections are made by heavy goods vehicles to the CDM Conservatories, Windows & Doors Ltd premises on the north side of the affected stretch of road. Most traffic relating to these premises consists of smaller commercial vehicles.

- The former Kidderminster Footwear premises are currently badly fire-damaged and derelict. Previously, smaller commercial vehicles made deliveries to the premises and parked in front of the building.
- 3.3.4 Emergency vehicles frequently travel at high speed along the stretch of road. Rossendale Police Station is a short distance away (about 50m to the west of Holt Mill Road).
- 3.3.5 The stretch of road is busy; the A681 is the main road of the valley.
- The traffic flow on the stretch of road is variable.
  - This part of the road is classified as an area of congestion in the East Lancashire Highways and Transport Masterplan (2014). The road is most congested at about 07-00 to 09-00 and 15-00 to 18-00 on Mondays to Friday.
- 3.3.6 The Lancashire County Council MARIO (Maps & Related Information Online) resource indicates that a cluster of five collisions between motor vehicles have happened in the area near the junction of Holt Mill Road and Bacup Road. We have been unable to find any further information about these collisions.
- 3.3.7 There is a bus stop and shelter on the south side footway between 607 Bacup Road and Holt Mill Bridge. There is a bus stop on the north side between the North West Timber yard and Holt Mill Bridge.

### **3.4 Parking**

- 3.4.1 Parking for residents in the area currently seems to be adequate:
- There are parking bays on Holt Mill Road which seem to, just about, meet the needs of the residents of Holt Mill Road and 601 Bacup Road.
  - The parking for the residents of Fern Lea Street, 603 Bacup Road and 605 Bacup Road is only adequate providing that vehicles park on Bacup Road (normally outside 601 and 603 Bacup Road).
  - 607 Bacup Road has access to an off-road parking area to the side of the building.
  - Any visitors, including tradesmen, to the properties (Holt Mill Road, Fern Lea Street, and 601 to 607 Bacup Road) normally must park on the stretch of Bacup Road that is not covered by parking restrictions (on the south side from about 30m to the west of Holt Mill Road to just before 605 Bacup Road).
  - There are no other suitable parking spaces in the immediate vicinity.
- 3.4.2 Parking for the businesses located within the area affected appears to be adequate:
- Dominion Colour Corporation have a large carpark on Holt Mill Road.
  - North West Timber, LJ & R Wholesale Footwear, CDM Conservatories, Windows & Doors Ltd and the former Kidderminster Footwear premises have off-road parking facilities.
  - CDM Conservatories do sometimes park vehicles on Bacup Road.
- 3.4.3 “Pavement parking” outside 601 and 603 Bacup Road
- Cars, other than very large SUVs, rarely “pavement park”.
  - Very large SUVs and small commercial vehicles sometimes park on the pavement to minimise disruption to the traffic flow.

### **3.5 Existing use of the cycleway/footway/bridleway to the west of the proposed cycleway and existing bridging of the “Buckhurt Plant Gap” by cyclists**

3.5.1 We regularly use the section of cycleway/footway/bridleway to the west of the proposed cycleway; we use it as pedestrians. Our observations are that it is mainly used by dog walkers and other pedestrians. It is used by some cyclists:

- Currently relatively few cyclists use this route. We can walk the entire length of the route to Cloughfold without seeing a cyclist.
- The number of cyclists using the route increased during the various “lockdowns” of the pandemic but the numbers now seem to be lower than before the pandemic.
- The cyclists using the route are mainly “mountain bikers”. Occasionally, but rarely, we see small family groups of recreational cyclists. We have not seen road/racing cyclists or “everyday” (people travelling to and from work or school) cyclists using the route.
- The cyclists are mainly composed of adults and family groups with few unaccompanied children. They range from individual cyclists to groups of up to about eight cyclists.
- Some cyclists seem to know the area but we have observed some who have looked totally lost as they have reached the eastern end of this section.

3.5.2 When cyclists get to the stretch of Bacup Road, they currently have the choices of:

- Dismounting and walking along the footway for less than two minutes
- Cycling along the road
- Cycling unlawfully along the footway

3.5.3 We observe that very few cyclists choose to dismount and to walk along the footway.

3.5.4 We observe that some cyclists choose to join the A681 and cycle along the road. Cyclists travelling from east to west are more likely to cycle along the road as it is relatively easy to join the traffic. Cyclists travelling from west to east are less likely to cycle along the road due to the difficulty in joining the flow of traffic.

3.5.5 We observe that most cyclists travelling from west to east choose to cycle along the footway and a small proportion of those travelling from east to west cycle along the footway.

3.5.6 We observe that most, but not all, of those cyclists that cycle along the footway do so in a responsible and considerate way; they are mindful of pedestrians and of the hazards to themselves of vehicles crossing into side roads. A small proportion of cyclists are not responsible or considerate.

## **4. Assessment of the Proposals**

### **4.1 Is a shared use cycleway suitable?**

4.1.1 LTN 1/20 discourages shared use cycleways. Section 6.5.4 of LTN 1/20 describes the conversion of footway (in urban areas) to shared use as a last resort. This section of LTN 1/20 concisely summarises the disadvantages of shared use cycleways:

*“Shared use facilities are generally not favoured by either pedestrians or cyclists, particularly when flows are high. It can create particular difficulties for visually impaired people. Actual conflict may be rare, but the interactions between people moving at different speeds can be perceived to be unsafe and inaccessible, particularly by vulnerable pedestrians. This adversely affects the comfort of both types of user, as well as directness for the cyclist.”*

4.1.2 We are aware that in section 5.5.3 of LTN 1/20 it states that:

*“...away from the highway, and alongside busy interurban roads with few pedestrians or building frontages, shared use might be adequate...”*

We consider that the proposed shared use cycleway has more than a few pedestrians and more than a few building frontages to be adequate.

4.1.3 We are not aware, through our FOI requests, that “early engagement with relevant interested parties (*has been*) undertaken, particularly those representing disabled people, and pedestrians and cyclists generally” as recommended in section 6.5.5 of LTN 1/20.

4.1.4 We acknowledge that section 6.5.6 of LTN 1/20 states that shared use may be appropriate in some situations, if well designed and implemented. We disagree that the current proposed cycleway is well-designed; our comments are given below in paragraphs 4.2 to 4.7. We accept that the list of possible situations in which shared use may be acceptable given in section 6.5.6 is not exhaustive but, in the absence of further information, we have assumed that the proposed plans are “*to achieve continuity of a cycle route*”. This conjures up images of a Gap in a well-designed purpose-built cycle route which is far from the situation with the “Buckhurst Plant Gap”. The last part of the purpose-built cycle route ends just behind the Dominion Colour Corporation factory on Holt Mill Road. The proposed cycleway joins a stretch of side street (Holt Mill Road) and joins to more side street (un-named road). We wish for anybody, independent of the designers of the proposed cycleway, who may review our comments to properly understand the context of the proposed cycleway.

## **4.2 Width of the proposed cycleway**

4.2.1 Our comments relate to the length of the proposed cycleway in front of 601 and 603 Bacup Road.

4.2.2 We acknowledge that the proposed widening of the footway to 3m meets the recommended minimum width for shared use routes carrying up to 300 pedestrians per hour and up to 300 cyclists per hour (LTN 1/20 paragraph 6.5.7 and table 6-3).

4.2.3 However, we feel that the proposed width of the cycleway is inadequate when the recommendation of LTN 1/20 for “additional width at fixed objects” is considered (paragraph 5.5.4 and table 5-3 of LTN 1/20). Paragraph 5.5.4 of LTN 1/20 states:

*“Where a cycle track is bounded by a vertical feature, people will not be able to use the entire width as they will naturally be wary of riding immediately next to walls and kerbs”*

The proposed cycleway will be bounded by vertical features on both sides outside 601 and 603 Bacup Road. Outside 601 Bacup Road there is a low wall topped by metal railings, outside 603 Bacup Road there is a low wall topped by wooden fencing; both of these are more than 600 mm high. The cycleway plans propose bollards on the edge of the cycleway outside both 601 and 603 Bacup Road; we assume these bollards to be taller than 600 mm. The impact of these vertical features is that, according to LTN 1/20 table 5-3, an additional width of 500 mm is required to maintain the effective width of the cycle track for each vertical feature. The effective width of the cycleway outside 601 and 603 Bacup Road is reduced from 3 m to less than 2 m (the bollards will be set some way from the edge of the cycleway). Effectively the cycleway will only allow a single cyclist travelling in one direction to use the cycleway in comfort and safety along this part of the proposed cycleway. We refer

you to section 5.2 of LTN 1/20 which considers the dynamic kinetic envelope of the user. The logical progression of our reasoning is that pedestrians will be forced to the edges of the cycleway if there is a cyclist using the cycleway at the same time and that if two cyclists are approaching each other then one will have to wait to let the other by.

#### **4.3 Proposals for the bus stop**

4.3.1 We consider the proposals for the accommodation of the existing bus stop in the proposed cycleway to be inadequate and confusing.

4.3.2 We acknowledge that the designers of the proposed cycleway would have preferred to relocate the bus stop but we know, through our FOI requests, that it was not possible to move the bus stop.

4.3.3 We acknowledge that it is proposed to widen the footway/cycleway to 3.5 m in the vicinity of the existing bus stop.

4.3.4 We have the following observations/concerns about the plans:

- It is not clear if the existing bus shelter will be retained, replaced or removed.
- The plan indicates that the existing post box will be repositioned to the back of the footway/cycleway adjacent to the wall of the bridge but the existing lamppost will stop in its current position. As the post box and lamp post currently stand side-by-side the proposals would seem to reduce the effective width of the cycleway. This does not seem logical or beneficial.
- We cannot see how the proposals for the bus stop conform to the recommendations in LTN 1/20 for bus and tram stops (sections 6.6.6 to 6.6.15).
- We consider that, on the basis of the sparse information given on the plan, there will be potential for adverse interaction between cyclists, pedestrians and those waiting for the bus in the immediate vicinity of the bus stop due to a lack of effective width of the cycleway.

#### **4.4 Signs**

4.4.1 The plans do not indicate that any signs to indicate the start/end of the shared cycleway will be installed at the west (Holt Mill Road) end of the cycleway or at the junction of Holt Mill Road with the cycleway.

4.4.2 We consider that cyclist joining the cycleway from Holt Mill Road should be alerted to the fact that they will be joining a shared use cycleway and to be aware of pedestrians.

4.4.3 We consider that cyclist leaving the cycleway to join Holt Mill Road need to be alerted to where the cycle route continues (to the left) rather than continuing down Bacup Road towards Rawtenstall.

4.4.4 We surmise that the designers of the shared cycleway may have recognised that the installation of signs on the cycleway at the Holt Mill Road end of the cycleway would reduce the effective width of the cycleway even more (see paragraph 4.2.3).

#### **4.5 Footway on Holt Mill Road as it joins the proposed cycleway**

4.5.1 The junction between the footway on Holt Mill Road and the footway on the south side of Bacup Road is at 90 degrees and is blind.



4.5.2 Pedestrians and cyclists need to be warned of this hazard.

4.5.3 There does not seem to be any acknowledgement of this hazard in the plans or measures to reduce the risk to pedestrians.

#### **4.6 Impact of the proposed reduction of the width of the A681 at the junction with Holt Mill Road on the ability of heavy goods vehicles to reverse into Holt Mill Road for access to the Dominion Colour Corporation factory**

4.6.1 We estimate that the road width will be reduced by about 0.8 m in the area outside 601 and 603 Bacup Road.

4.6.2 We are concerned that there may have been no analysis of the potential effects of this reduction in road width on the ability of heavy goods vehicles to reverse into Holt Mill Road to access the Dominion Colour Corporation factory.

- Very large heavy goods vehicles reverse into Holt Mill Road on a regular basis. We have not observed a regular repetitive schedule but we have observed that on one or two days each week up to 6 to 8 vehicles reverse into Holt Mill Road.
- We are aware, through our FOI request, that in October 2020 an analysis was done on impact of the proposed narrowing of parts of Bacup Road to accommodate a shared use cycleway on heavy goods vehicles accessing the LJ & R Wholesale Footwear and CDM Conservatories, Windows & Doors Ltd premises (VOS-03-008CT.DWG). This analysis did not seem to include the impact on heavy goods vehicles accessing Holt Mill Road.
- We have observed in the last three years that, although almost all of the drivers of the heavy goods vehicles have no problems reversing into Holt Mill Road, some do. We are aware of at least two incidents in which superficial damage appears to have been caused to the exterior of the CDM Conservatories, Windows & Doors Ltd premises by vehicles manoeuvring to reverse into Holt Mill Road.
- We are concerned that even a slight narrowing of the road to accommodate a wider cycleway might create further problems.

#### **4.7 The length of the proposed cycleway that crosses side roads**

4.7.1 A considerable proportion (about one third of the length) of the proposed cycleway crosses side roads or access roads for vehicles. From west to east these are:

- Back alley between Holt Mill Road and Fern Lea Street.
- Fern Lea Street
- Off-street parking area between 605 and 607 Bacup Road
- Parking area in front of the former Kidderminster Shoes premises
- Warth Lane
- Access road to Buckhurst Plant Hire premises

4.7.2 We acknowledge that the drivers of vehicles carry the responsibility for taking care as they cross the proposed cycleway but we consider that this still presents a significant potential hazard to cyclists.



## **5. Comments**

- 5.1 We acknowledge that the current situation (the Buckhurst Plant Gap) is far from ideal but we now consider it to be better than the proposed shared use cycleway.
- 5.2 Cyclists currently make their own decisions on how to cross the Gap. They are aware of the hazards of joining an often busy road or of cycling along a footway. They can assess the inconvenience of dismounting.
- 5.3 We are very concerned that cyclists using the proposed shared use cycleway will be lulled into a false sense of security and safety. Our analysis of the proposals suggests to us that cyclists will need to be very wary and careful when they ride along the narrow parts of the cycleway (see paragraphs 4.2 and 4.3). Cyclists will need to be very wary of pedestrians joining the cycleway from Holt Mill Road (see paragraph 4.4). Cyclists will need to be very wary of vehicles crossing the cycleway (see paragraph 4.5). Cyclists will need to be wary of passengers waiting at the bus stop (see paragraph 4.3). We do not see that there will be much, if any, improvement in the experience for cyclists.
- 5.4 We consider that proposals will make the experience of walking along the cycleway worse for pedestrians.
- 5.5 We do not consider that there is any evidence to suggest that the proposed cycleway will be sufficiently attractive to cyclists to stimulate an increase in the number of cyclists using the route.
- 5.6 We consider that the detriment to local residents outweighs any benefit to the very few cyclists that currently use, and probably will use, the cycle route.
- 5.7 It has taken almost ten years to try to resolve the problem of the “Buckhurst Plant Gap”. We consider that it is now time to accept that there is not, and will never be, a satisfactory solution until circumstances change. Those circumstances would be a change of attitude of those who own the land to the rear of Holt Mill Road and Fern Lea Street on access to their land or a change of ownership of the land.
- 5.8 Sometimes in life, a decision to do nothing and to leave matters as they are is a positive and effective solution. We consider that this is the wisest decision in this case.

