

Kirklees Council

Rebuttal Proof of Evidence of Adam Darwin FIHE

Appeal reference: APP/Z4718/W/25/3375000

Application reference: 2024/91242

Site: Land north east of, Shepley Road, Stocksmoor, Huddersfield, HD4 6XW

Description of development: Erection of residential development (50 dwellings) with associated access, parking, public open space, landscaping and infrastructure

Appellant: Newett Homes

Date: 04/02/26

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Appendix A - Highway Code Rules 200 – 203

1. Introduction

- 1.1 My name is Adam Darwin. The details of my qualification and experience are included in my main proof of evidence. I have prepared this rebuttal proof of evidence in response to some of the specific matters in the evidence on behalf of the Appellant by _____ regarding Reason for Refusal 1.
- 1.2 This rebuttal is limited solely to those matters where further clarification and/or commentary is considered necessary at this stage. If there are other matters in _____ Proof of Evidence that I have not commented on, this should not be taken to mean that I agree with _____ on those matters. I have not sought to comment on all matters raised, nor have I repeated comments which are already in my original Proof of Evidence.

2. Evidence of relating to Reason for Refusal 1

Traffic Surveys of Stocksmoor Village - Tuesday 11th and Wednesday 12th November 2025

- 2.1 As set out at paragraph's 3.15 – 3.17 of my proof of evidence, I raised various concerns regarding the late submission of new traffic survey data provided by the Appellant by email of Monday 19th January 2026 [CD 5.5], which we were advised would be used in proof of evidence; and we reserved the right to comment further once we had a better understanding of the surveys and their intended purpose.
- 2.2 I have now had the opportunity to review evidence, which includes further information relating to these new traffic surveys, as described in his evidence at paragraph's 3.3.21 – 3.3.26. The data is then included in Appendix F of his evidence, which includes a basic summary of the survey methodology provided by the survey company (RDS Ltd). then goes on to utilise the data to determine a bespoke trip rate for Stocksmoor in Section 6.4 and a bespoke traffic distribution methodology in Section 6.5.
- 2.3 Whilst I will not repeat my concerns regarding the late submission of the data, and the paucity of information supplied with the data, which are set out in my proof of evidence (and remain valid), it is necessary for me to expand upon my concerns regarding the validity of this new traffic data.
- 2.4 At paragraph 3.16 of my proof of evidence, I noted that there have been significant and ongoing roadworks (water main replacement works) within Stocksmoor, which the Local Planning Authority (LPA) understands commenced on the day of these new traffic surveys (the permit to work within highway started on 11/11/25 and ran until 19/12/25) and are still ongoing as of 02/02/26 (note the latest permit runs from 05/01/26 and not 05/11/26 as incorrectly stated in my evidence). The permit allows for the provision of 4-way traffic signals at the Cross Lane / Shepley Road / Fulstone Road junction (e.g. within the centre of the new traffic count cordon), which I had myself observed being in place on site on 3rd December 2025.

2.5 Based on my on-site observations on 03/12/25, 4-way temporary traffic signals were in operation that included the Cross Lane / Shepley Road / Fulstone Road junction, with the lights covering the extent of highway shown in red on Figure 1 below (the extent of the new survey area is shown edged in blue for context).



Figure 1 – Approximate extent of 4-way traffic signals on 03/12/25 lined in red

2.6 Since my site visits in December 2025, I have observed during recent site visits in January that the works have now progressed north on Station Road and the temporary traffic signals have now been removed from the Cross Lane / Shepley Road / Fulstone Road junction. This included a site visit on 02/02/26 at 9:00am, where 4-way temporary traffic signals were in place on Station Road to the north of the Derwin Avenue junction, and included the junction with Birks Lane to the north. During my most recent site visit, I spoke to the operative who was maintaining the temporary traffic signals, who suggested that he had undertaken the initial installation of the temporary traffic signals on the first day (but could not confirm the date), and that on the first day, 2-way traffic signals were used to undertaken the initial works on Station Road.

2.7 Given that the scope and timing of these new traffic surveys has again not been discussed or agreed with the LPA (contrary to good practice and the Local Highway Authority (LHA) permitting requirements), it is now impossible for us to confirm exactly what, if any, traffic management was in place on the two new traffic survey days, and there is no mention of the temporary traffic signals in

evidence. Given that the survey company has used cameras for the traffic surveys, they will clearly have knowledge if temporary traffic signals had been installed at the time of the survey. Therefore, either the installation of the temporary traffic signals may have been delayed from the agreed start date, or this is serious omission of vital information that impacts the validity of the data.

2.8 I also note that I have commissioned many traffic surveys from RDS Ltd in the past, when I was working in the private sector, and it is their standard practice to check whether there are any planned road works during any traffic surveys that need to be avoided, with this information being readily available online or by contacting the Highway Authority. Therefore, it is surprising to me that these surveys have gone ahead when roadworks permits were in place for this section of highway, regardless of whether any temporary traffic signals were in place.

2.9 [redacted] will be able to provide further insight into these matters at the Inquiry, and will be able to provide evidence from the camera footage to confirm that neither survey was affected by any roadworks. However, if temporary traffic signals were in place during the new surveys, then this new traffic data will be invalid and should be disregarded in its entirety. This is particularly relevant in relation to the surveys being used for traffic distribution assessment purposes, as any temporary traffic signals that were in place will have influenced the route choice of residents accessing their properties. To put this into context, the 4-way traffic signals I observed in operation at the Cross Lane / Station Road / Shepley Road junction (leading to Stone Wood Lane) took somewhere between 2-3 minutes for the full signal cycle to be completed. This will have resulted in some drivers choosing alternative routes to avoid being delayed at the traffic signals (e.g. likely avoiding travelling via Stone Wood Lane, and using alternative routes via Stocks Moor Road and Birks Lane instead).

2.10 Notwithstanding the above concerns regarding the validity of the survey data, the following additional concerns are noted:

- Whilst the principle of obtaining traffic survey data to determine a bespoke trip rate and traffic distribution for the development sites can be an acceptable approach, the scope and timing of these traffic surveys were

not discussed or agreed with the LPA in advance, contrary to good practice (and LHA permitting requirements).

- Had the LPA been consulted regarding the survey methodology, we would have requested that the whole of Stocksmoor was included in the survey to determine a bespoke vehicle trip rate, as the properties selected by
are not representative of the development (e.g. based on the type / scale of the properties, which include large detached houses and bungalows; and the likely demographic of occupiers being incomparable, which is an issue already highlighted by the Rule 6 Party e.g. a significant proportion of existing residents are understood to be older and/or retired, so do not need to travel as frequently during network peak periods). Had the whole of Stocksmoor been surveyed, including some of the smaller properties in the village (e.g. the terraced properties at Norton Terrace on Stocks Moor Road), this could have provided more representative data, incorporating some of the more affordable properties that are more likely to be occupied by younger people and families, and more akin to the Appeal site.
- The new traffic surveys have not recorded (or at least the data has not been supplied) any through traffic movements. This omission means that it is not possible to validate whether the surveys were undertaken during a typical daily usage (e.g. by comparison with the ATC data on Shepley Road).
- The use of cameras to manually track vehicles individually from camera to camera is a rather crude survey approach, which is likely to result in recording errors. This problem is compounded by the surveys being undertaken during wet conditions (for at least two of the survey periods), which from my experience can often seriously impair the camera footage (e.g. due to rain on the lens and the swaying pole mounted cameras). Therefore, the reliability of the data is questionable. A better approach would have been to use automatic number plate recognition (ANPR) cameras, which would have provided more reliable and verifiable data.
- The new traffic data provides a snap-shot of traffic flows on two days only, based on a relatively small sample size. Therefore, it does not provide

robust data that can be reliably used for assessment purposes (e.g. when using TRICS data, a survey sample size of 20 surveys is often desirable).

- The surveys have not been undertaken during a neutral month. These are typically regarded as April, May, June, September and October [CD 7.17 paragraph 4.19], or other such neutral period that have been agreed in advance with the LPA (which has not been done in this case). This issue is particularly relevant when considering traffic distribution, as drivers are less likely to use Stone Wood Lane during adverse weather conditions for safety reasons (e.g. when it is raining, as was the case during these surveys).

2.11 In summary, there are potentially fundamental flaws with the new traffic data, should be unable to confirm that there was no impact from the programmed roadworks. In addition to this, there are other elements of the survey methodology that of concern, and there is a lack of adequate information to allow the LPA to properly check and analyse the data. Therefore, even if the new traffic survey data was not impacted by the roadworks (e.g. it is possible the roadworks started late, sometime after the 13/11/25), I consider the surveys do not provide representative data that can be applied to the Appeal site, and must be treated with caution if accepted by the Inspector.

2.12 Notwithstanding the above concerns, I note that as set out at section 6.4 of proof of evidence, he has used the new traffic survey data to identify bespoke trip rates for Stocksmoor, as identified in his table 6.3. This analysis has identified two-way vehicle trip rates of 0.606 and 0.596 during the AM and PM weekday network peak periods respectively. This has then been used in Table 6.4 to identify two-way vehicle trips from the development of 30 vehicles during AM and PM weekday network peak periods. Whilst I do not accept the approach to deriving these trips rates is robust, as described above, they are now very similar to the 'Sensitivity Test' trip rates / vehicle trips of 0.630 trips per dwelling / 32 two-way vehicle trips (for both weekday network peak hour periods) that I have identified in my proof of evidence. Therefore, there is now virtually no disagreement between parties regarding the likely vehicle trip generation for the development, which lies somewhere between 30-32 two-way vehicle trips during either peak period.

2.13 Notwithstanding the concerns regarding the new survey methodology, which I consider are flawed and unreliable, I have reviewed the new traffic count data obtained during the AM survey on 11/11/25 (undertaken during 'light rain'), as it may be the case that this data was affected to a lesser degree by the roadworks (e.g. if the temporary traffic signals had not been fully installed by the AM peak period). Table 1 below includes the combined inbound / outbound traffic flows from the 105 dwellings within the survey cordon, with traffic along Shepley Road / Stone Wood Lane being to / from the east.

		Table 1 - Stocksmoor traffic survey data of Tuesday 11/11/25 (105 dwellings)									
		2-way vehicle movements					% Distribution				
		North	East	South	West	Total	North	East	South	West	Total
07:30	07:45	6	2	0	5	13	46.2%	15.4%	0.0%	38.5%	100.0%
07:45	08:00	3	1	1	5	10	30.0%	10.0%	10.0%	50.0%	100.0%
08:00	08:15	5	5	0	8	18	27.8%	27.8%	0.0%	44.4%	100.0%
08:15	08:30	5	4	0	1	10	50.0%	40.0%	0.0%	10.0%	100.0%
08:30	08:45	5	2	1	8	16	31.3%	12.5%	6.3%	50.0%	100.0%
08:45	09:00	3	2	1	8	14	21.4%	14.3%	7.1%	57.1%	100.0%
09:00	09:15	3	7	2	11	23	13.0%	30.4%	8.7%	47.8%	100.0%
09:15	09:30	1	4	1	1	7	14.3%	57.1%	14.3%	14.3%	100.0%
Total		31	27	6	47	111	27.9%	24.3%	5.4%	42.3%	100.0%

2.14 As can be seen from the above Table 1, traffic to / from the east via Shepley Road / Stone Wood Lane varied between 10-57% during each 15-minute time period, with 24.3% recording using the route over the full 120 minute survey period. These variations in traffic distribution are to be expected, due to the small sample size contained within the dataset. However, should any reliance be placed on this new traffic data (which I do not accept as being robust or reliable information), it can be concluded that a range of reasonable future scenarios for development traffic utilising Stone Wood Lane could lie between 25% and 50% of development traffic during the AM network peak period. These traffic distribution proportions are consistent with the low estimate of 25% that [redacted] set out within his H&T SoC document [CD 8.2] (e.g. 7 of the 28 two-way trips that he had estimated at the time, but has since increased to 30 two-way trips) and the higher estimate of 50% that I have identified as a reasonable future scenario based on what had been proposed by the Appellants second consultant in their TAA report [CD 1.33].

2.15 In conclusion, the new traffic count data included in [redacted] proof of evidence is not considered to provide a robust and reliable basis for assessment of

development traffic generation and / or distribution, and is potentially fundamentally flawed due to the roadworks that are understood to have been ongoing at the time of the surveys. However, even if this new traffic data were accepted by the Inspector, the data demonstrates that the trip rates and traffic distribution assessments I have used within my proof of evidence remain valid (where I have already taken into account both my higher estimate, and previous lower estimate of traffic using Stone Wood Lane). Therefore, the conclusions I have drawn in relation to the impact of development traffic on Stone Wood Lane are unaffected by this new traffic data, and I remain of the view that the proposed development will materially increase traffic on Stone Wood Lane by between 9-22% (See Table 5 of my proof of evidence), which will have a detrimental impact on highway safety and the amenity of active travel users utilising the route, and compound the existing safety and operational problems that already exist.

New Pedestrian / Cycle / Equine Surveys of Shepley Road / Stone Wood Lane Corridor

- 2.16 proof of evidence introduced brand new pedestrian / cycle / equine surveys undertaken along the Shepley Road / Stone Wood Lane Corridor at paragraphs 3.3.14 – 3.3.20. The raw data is then provided in PDF form in Appendix D of his proof of evidence, which includes approximately 80 pages of data in various tables.
- 2.17 confirms that this data was obtained by the Appellant's second consultant TPS Ltd. This new information provides comprehensive survey data over a full week period in June 2025 along Shepley Road and Stone Wood Lane, and also includes surveys of the footpath links on Stone Wood Lane that were ignored in in his H&T SoC document [CD 8.2].
- 2.18 Given the lateness in submitting this extensive new data, and by supplying the data in PDF form only, this given the LPA no realistic opportunity to review the data in any detail. To do this, it would require the LPA to manually input all of the data back into an editable format, to then allow further analysis to be undertaken, which is clearly impractical given that data inputting alone would take many days to complete.

2.19 Therefore, I am unable to draw much in the way of conclusions from the data, other than it appears to confirm what is already known, which is that Stone Wood Lane is an important and well used active travel route.

2.20 However, I would question why [redacted] had sought to obtain his new survey data from September/October 2025, which he introduced in his H&T SoC document [CD 8.2], when he already had a comprehensive dataset to work with. I would also question why he has then relied upon his new data (both in his H&T SoC document and now in his proof of evidence), even after the failure of the count equipment and flaws with the data that I have previously identified (e.g. the Saturday survey on 04/10/25 was undertaken on a wet autumn day, which has suppressed the active travel user flows). It is reasonable to assume that the previous TPS data did not suit [redacted] purposes for some reason, prompting him to seek further data to support his case. The reasoning for this appears to relate to the statement he has made a paragraph 3.3.17 of his proof of evidence, which states:

*'3.3.17 The June 2025 TPS surveys, which were undertaken during the summer, show lower non-motorised user movements than those recorded by Optima in Sep/Oct 2025. It is concluded that the Optima pedestrian/cycle/equine surveys are therefore valid and provide a **worst-case assessment [bold is my emphasis].'***

2.21 Firstly, I would question why [redacted] thinks it is a 'worst-case' that there are more active travel users, which is surely a good thing. Secondly, the June 2025 TPS data does not show lower flows than the later Optima data, which [redacted] has acknowledged (to some extent) in his paragraph 3.3.16 that states the: *'TPS surveys show that a slightly greater use was recorded on Shepley Road...'*

2.22 Whilst it is impractical for me to analyse the newly provided TPS survey data in any great detail, I have reviewed the total active travel users flows at either end of the Shepley Road / Stone Wood Lane route for each of the 7 survey days in June, which are shown in Table 2 below:

Table 2 - Total Active Travel User Flows (0700-1900)						
	Stocksmoor end of route			Shepley end of route		
	Northbound	Southbound	2-way	Northbound	Southbound	2-way
Tuesday 03/06/25	15	8	23	10	8	18
Wednesday 04/06/25	24	19	43	16	20	36
Thursday 05/06/25	9	12	21	6	11	17
Friday 06/06/25	25	13	38	13	10	23
Saturday 07/06/25	18	17	35	11	15	26
Sunday 08/06/25	28	27	55	24	28	52
Monday 09/06/25	17	14	31	19	15	34
Average	19.4	15.7	35.1	14.1	15.3	29.4

2.23 The following conclusions can be drawn from the above data:

- The average 12hr two-way flows of 35 and 29 users at the Stocksmoor and Shepley ends of the route match those in Table 3.5 and 3.6 of proof of evidence. Therefore, my manual inputting of the data into an editable format appears to be correct.
- Whilst the average weekly 12hr flow at the Shepley end of the route (29 users) is slightly lower than the Optima survey data (31 users recorded on 24/09/25), there are two weekdays (Wednesday 04/06/25 & Monday 09/06/25 where 36 & 34 users were recorded respectively) where the flows are higher. For the weekend data, the active travel user flows were the same (e.g. 52 users recorded on both Saturday 27/09/25 in the Optima survey, and the same on Sunday 08/06/25 in the TPS survey). Therefore, the TPS data shows slightly higher usage at the Shepley end of the route than the Optima data, contrary to what [redacted] has stated at 3.3.17 of his proof of evidence.
- The TPS data shows an average of 35 users over the weekly 12hr period, with a weekday peak 12hr flow of 43 users on Wednesday 04/06/25, and a weekend peak 12hr flow of 55 users on Sunday 08/06/25. When this is compared to the Optima data (Table 3.4 of [redacted] proof of evidence), which shows 24 users over the 12hr period on Wednesday 24/09/25 and 8 users on Saturday 04/10/25, it is clearly wrong for [redacted] to suggest that the TPS flows are 'slightly higher'. The peak weekday flow in the TPS data is approximately twice the volume (e.g. 43 users in TPS data compared to

24 in the Optima data) and the weekend flow in the TPS data are nearly seven times higher (e.g. 55 users in TPS data compared to 8 in the Optima data), which are not slight differences in my opinion.

- Due to the shortcomings of the Optima data that I have identified above, together with the points I have already made in my proof of evidence above the data, I suggest that any conclusions drawn in proof of evidence that rely on the active travel user data should be disregarded, as they are unreliable.

2.24 In conclusion, it is unfortunate that the TPS active travel user survey data was not provided sooner, and in a format that would have allowed the LPA to further analyse the data, as this could have provided some useful insight for the Inspector to consider, rather than the erroneous and misleading interpretation of the data that has been included in proof of evidence. However, notwithstanding this, the inclusion of the new TPS data is welcomed, as it continues to demonstrate that Stone Wood Lane / Shepley Road is a well-used route by pedestrians, cyclists and horse riders.

Other matters

2.25 There are a number of other points made by proof of evidence, which it is necessary for me to respond to and provide further clarification at this stage. These other matters are set out below, which are taken in the order they are set out in evidence, with the relevant paragraph numbers identified.

2.26 At paragraph 3.2.12 of proof of evidence, he has made reference to a planning application at Cross Lane, Stocksmoor (ref: 2014/60/90460), where my colleague had suggested in his consultation response that Cross Lane was 'lightly trafficked', with trying to draw comparisons with Stone Wood Lane. It is important to note that it is the context of the street that needs to be taken into account when considering such matters, which has failed to do. Cross Lane is a residential collector road, which is within a 30mph speed limit, is street lit, has a continuous footway provision (along one side) and allows for two-way traffic (over 5.5m wide) along its entire length. Therefore, it is incomparable to Stone Wood Lane and any attempt to liken the two roads is misleading.

- 2.27 At paragraph 3.2.14 of [redacted] proof, he has likened Stone Wood Lane to Dobb Top Road / Smithy Lane in Holmebridge, where there is a consented development site (Ref: 2023/91212) that we both worked on. Again, these roads are incomparable to Stone Wood Lane in virtually all respects, other than that they operate as shared surface streets due to the lack of footways. The streets in Holmebridge are within a 30mph speed limit, street lit, signed school walking routes and are located centrally within the village; and are not located outside of the settlement, as is the case for Stone Wood Lane.
- 2.28 At paragraph 3.3.4 and Appendix G of [redacted] proof of evidence, he has sought to disregard the use of the original ATC data included in the AMA TA [CD1.23], which I have utilised in my proof of evidence and was referenced in my HDM comments of 11/04/25 [CD 4.16]. His justification for this is that the data will include traffic from the houses located immediately to the south on Stone Wood Lane. This is weak argument, and has only been used to justify why the average traffic flows from the other two sets of ATC data should be used instead (providing lower base flows to suit [redacted] case). To put this into context, the 3 houses located to the south of the site could generate 1.9 two-way weekday peak hour trips, based on the higher 'Sensitivity test' trip rate of 0.63 that I have utilised within my assessment. Based on [redacted] assessment of traffic distribution (as presented in his H&T SoC [CD 8.2]) of 25% of traffic via Stone Wood Lane and the remaining 75% via Shepley Road to the west, this would equate to 1.4 two-way vehicle trips (e.g. 1.9 vehicle trips x 75%). Therefore, when this is rounded to the nearest whole vehicle, the maximum difference in trips that would need to be removed from the ATC data to alleviate [redacted] concerns would be minus 1 vehicle. Clearly this is no reason for [redacted] to discount this ATC data entirely, just to suit his own argument, and the use of the AMA ATC data should continue to be used for assessment purposes.
- 2.29 At paragraph 6.5.3 (and continuing in paragraphs 6.5.4 – 6.5.8) of [redacted] proof of evidence, he suggests that the traffic distribution methodology proposed by TPS Ltd in their TAA report [CD 1.33] was supported by Kirklees Council. This is a complete misrepresentation of the facts. The Inspector's attention is drawn to 5.12 - 5.14 of my proof of evidence (and as set out earlier in the Council's Statement of Case), which explains this point in more detail. Attention is also drawn to the last

paragraph on page 2 of my HDM consultation response of 11/04/25 [CD 4.16], which clearly states:

'HDM do not accept some of the trip distribution assumptions that have been used to derive the above revised estimates, including the assumption that no primary school children living at the development site would attend schools to the east and travel to school via Stone Wood Lane (e.g. those attending Shepley First School). However, the level of peak hour vehicle trips that have been identified in the TAA, including those that may use Stone Wood Lane are considered reasonable.'

- 2.30 At paragraph 6.7.4 and Appendix G of [redacted] proof of evidence, he has made a point about development traffic being within daily variation in traffic flow on Stone Wood Lane. This is irrelevant, as daily variations will continue to occur should the development proceed, but the peaks would simply increase above current maximum levels due to additional development traffic. I also do not accept that these variations would be *'difficult to perceive'*, as the conflicts between road users would rise alongside the traffic flows increases. As a minimum, these conflicts would increase proportionately with the increase in traffic flow. However, the Rule 6 Party have provided some interesting mathematical evidence (which I will not attempt to explain, as it is beyond my level of maths knowledge) that suggests that vehicle conflicts may increase at a disproportionately (e.g. non-linear) higher rate.
- 2.31 At paragraph 7.2.8 – 7.2.9 of [redacted] proof of evidence, he suggests that there are two locations where reversing of up to 14 and 22m is required, and he considers this to be acceptable and safe. As I have set out in my proof of evidence, my greatest concern relates to the single-track section up the steep hill through Stone Wood, which has a single-track section of at least 134m (See paragraph 4.21 of my proof of evidence). Due to the length of this single-track section, there are frequent occurrences that I have observed, where much longer reversing occurs than [redacted] has identified. Notwithstanding this, I do not accept that reversing even 22m in a narrow rural lane is a 'safe' manoeuvre, and creates inherent safety risks that I have set out in detail my evidence. To put this matter into context, attention is drawn to Rule 200 – 203 of the Highway Code (See extract at Appendix A of this rebuttal evidence), which provide numerous

recommendations about avoiding or mitigating the risks associated with reversing manoeuvres, and requires that drivers **must not** reverse longer than is necessary, due to the inherent risks that it involves. The additional vehicle conflicts created by development traffic along Stone Wood Lane will increase the need for reversing, and will exacerbate the existing safety issues that already occur along the route associated with these manoeuvres.

Appendix A – Highway Code Rules 200 – 203

Rule 200

Choose an appropriate place to manoeuvre. If you need to turn your vehicle around, wait until you find a safe place. Try not to reverse or turn round in a busy road; find a quiet side road or drive round a block of side streets.

Rule 201

Do not reverse from a side road into a main road. When using a driveway, reverse in and drive out if you can.

Rule 202

Look carefully before you start reversing. You should

- use all your mirrors
- check the 'blind spot' behind you (the part of the road you cannot see easily in the mirrors)
- check there are no pedestrians (particularly children), cyclists, other road users or obstructions in the road behind you.

Reverse slowly while

- checking all around
- looking mainly through the rear window
- being aware that the front of your vehicle will swing out as you turn.

Get someone to guide you if you cannot see clearly.



Rule 202: Check all round when reversing

Rule 203

You **MUST NOT** reverse your vehicle further than necessary.

Law [CUR reg 106](#)