

Rossendale Borough Council
Room 120
The Business Centre
Futures Park
Bacup

15 January 2023

Dear Sir/Madam,

RE: PLANNING APPLICATION 2022/0451 – LAND WEST OF MARKET STREET, EDENFIELD

We are writing to you on behalf of the Edenfield Community Neighbourhood Forum (ECNF), following the submission of a full planning application by Pegasus Group for the erection of 238 no. residential dwellings (Use Class C3) and all associated works, including new access, landscaping and public open space at the above-mentioned site. We note the application was received in September 2022 and was validated in November 2022. In December 2022 we engaged with Lancashire County Council (LCC), as Highway Authority.

The Council will recall ECNF and SK Transport Planning (SKTP) took an active role in the Local Plan process. This included appearing at the Local Plan Examination and listening carefully to both Rossendale Borough Council's (RBC) position, Lancashire County Council's (LCC) position and that of the promoters of the various housing sites in the village on traffic and transport matters.

It is reasonable to conclude that ECNF, and their professional advisors were concerned with the lack of technical detail on a range of matters, including traffic and transport supplied by the site promoters. In turn this led to the unsatisfactory position of RBC promoting the above-mentioned site as being suitable for residential development, despite there being a raft of technical matters that were either unanswered or required further technical studies to be able to form a conclusion.

This position was demonstrated by the volume of additional questions and information that the Inspector requested on the proposed housing site allocations during the life of the Examination. The level of additional information requested at this time on fundamental technical matters did not inspire confidence that the Draft Local Plan, which has now been adopted, has been assembled in a robust and accurate way.

Moving forward, now that the Local Plan has been adopted and the above-mentioned site allocated for residential development, it was inevitable that a planning application would be submitted promptly. With regard to the traffic and transport matters, RBC were very clear that development would be supported if:

- 1) *the comprehensive development of the entire site (our emphasis) is demonstrated through a masterplan with an agreed programme of implementation and phasing;*
- 2) *The development is implemented in accordance with an agreed design code;*
- 3) *A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:*
 - a. *safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;*
 - b. *agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms. Measures to assist pedestrian and vulnerable road users will be required.*

The explanation for releasing this land for residential development was set out by RBC as follows:

“Exceptional circumstances have been demonstrated to support the release of this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site’s context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements.

Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Forum, to ensure a Masterplan is prepared.”

RBC went on to confirm that as part of any future planning application the development proposals would need to be subject to a:

“...Scoping Study, a Transport Assessment and Travel Plan. This must be agreed with Lancashire County Council. Appropriate measures must be put in place to address any impacts the development may have on the strategic and local road networks. A Travel Plan will seek to ensure that the development promotes the use of public transport, walking and cycling.”

RBC and LCC, as Planning and Highway Authorities could not have been clearer as to what technical information would need to be submitted with an application, and the thresholds that would need to be reached to make the development acceptable, including an expected package of mitigation works for the Market Street corridor. This requirement is not only set out in RBC’s allocation of the site, but it was also verbally confirmed by Mr Neil Stevens, representing LCC at the Local Plan Examination in Public.

Whilst the concerns over the scale of the residential development allocation for the village remain at the forefront of ECNF, there was at the time some level of comfort that the Planning and Highway Authorities had set out a robust position and threshold to future applicants that they would need to satisfy.

This formal response has been prepared by SKTP to assess the planning application technical submission documents for traffic and transport matters against the Planning and Highway Authorities requirements. Each technical matter is set out and discussed in detail below.

Development of a Comprehensive Masterplan, with an Agreed Programme of Implementation and Phasing

Perhaps the first, and most obvious requirement from RBC and LCC was that the 400 residential unit allocation had to be considered in a comprehensive manner, and not ‘salami sliced’ by site promoters to avoid a cumulative assessment of the impacts of the allocation on the village.

The Council’s requested approach would have required a masterplan to be developed for the whole site, covering the 400 residential unit allocation. The masterplan would be expected to show:

- a) a comprehensive access strategy for the whole site, for all travel modes
- b) detailed assessment of all access point to and from the surrounding highway network
- c) a clear assessment of the impacts (in traffic and transport terms) of the 400 residential unit allocation on the surrounding highway network
- d) a robust and deliverable mitigation strategy, to both promote sustainable travel to and from the site, and also mitigate the impacts of the development on the village, the surrounding highway network and the Market Street corridor, as stipulated by LCC at the EiP

Based on the above position, there is a clear level of disappointment from ECNF that the applicant has failed at the first hurdle to present this information in their September 2022 planning application. The whole rationale of the requirement was to ensure that any assessment of the 400 residential unit allocation was considered in its entirety, to avoid the temptation of undertaking a “piecemeal” approach to assessing the impacts of the development.

As an example, the submitted Transport Assessment (TA) focuses on the assessment of the impact of developing 238 residential units, not the cumulative 400 units set out in the allocation. This assessment scale is confirmed in **paragraph 7.3.1** in the submitted TA, in the full knowledge that the requirement from

RBC and LCC was to prepare a full assessment for the complete allocation, confirmed in the TA at **paragraph 2.1.2**. Whilst the TA does include a sensitivity assessment for the additional 65 residential unit scheme served from Blackburn Road, and the 95 unit scheme served via Exchange Street in **section 7.9**, this separate assessment does not include the assessment of key junctions previously identified by both RBC, LCC and the site promoters through the Local Plan site promotion period. We provide further detailed commentary on this point later in this response.

Having identified this key technical matter, there are fundamental issues with the accuracy of the assessment work contained within the TA. At this stage we request both RBC and LCC respond to the applicant and reiterate that their assessment has to clearly show all the development areas within a masterplanned area, which will then shape the access strategy, study area and technical assessment.

Vehicular Access Matters – Market Street

The TA presents an access strategy for the 238 residential units being accessed from a new ghosted right turn junction on the western side of Market Street. During the Local Plan examination ECNF identified that the access strategy proposed at the time, which took the form of a simple priority junction, was not suitable for the level of baseline traffic using Market Street, and the volume of traffic generated from the proposed development.

Widening of Eastern Footway on Market Street

Whilst ECNF are encouraged that the applicant noted the technical points made by the group during the Local Plan EiP, the ghosted right turn priority junction presented in drawing MAN.0299.001 has omitted the recommended widening of the footway on the eastern side of Market Street from 1m to 2m. This was shown in the ECNF submissions to the EiP.

This footway widening on the eastern side of Market Street is required to ensure that pedestrians and those with impaired mobility using this footway have an appropriate width to pass and not step onto the carriageway of Market Street. This requirement is amplified by the proposed development access requiring all kerbside parking being permanently removed on this section of Market Street to provide the running lanes and ghosted right turn pocket.

By removing the car parking and not widening the eastern footway to 2m all southbound traffic will route immediately adjacent to the 1m footway and the front elevations of the residential properties on the eastern side of Market Street, creating an unattractive corridor for pedestrians to use.

The applicant is fully aware of the requirement to enhance access by sustainable modes, as they reference LTP3 in paragraph 4.3.4 in the TA, which states:

“In relation to improving people’s quality of life and wellbeing the document recognises that ‘fears about road safety and traffic speeds can deter people from walking and cycling’ and suggests that this can be addressed by ‘creating environments which are attractive for walking and cycling which also benefits social inclusion and cohesion.’ Where appropriate the Council will expand the existing network of footways and cycleways to assist in creating quality neighbourhoods.”

By ignoring the matter of widening the eastern footway on Market Street the access proposals cannot be considered compliant with LTP3.

Whilst it is not the ECNF’s responsibility to design the access arrangements for the applicant, it was previously identified at the EiP that the combination of widening Market Street to accommodate the ghosted right turn access arrangement, along with the requirement to provide 2m footways on both sides of the carriageway may result in challenges providing a continuous 2m footway at the northernmost point of the site frontage adjacent to nos.113 Market Street.

Junction Visibility Splay Validation

In addition, it was recommended that the “Y” distance visibility splay dimensions should be calculated using recorded 85th percentile speed survey data, in line with CA185. With no speed survey data presented in the

TA, there is a requirement that the applicant validates their proposed 2.4m x 43m visibility splays against actual recorded speed survey data for this section of the adopted highway.

In the absence of any evidence presented by the applicant, reference is drawn to the ECNF seven day ATC data presented in their submissions to the EiP, which confirmed that in both directions on Market Street the 85th percentile speeds were in excess of 30mph, without any adjustment for wet weather speeds.

Displaced Parking on Market Street

During the Local Plan EiP ECNF made the technical point that any new access on Market Street would need the existing kerbside parking on the eastern and western side of the carriageway to be permanently removed. Members of ECNF, living locally in the village made the valid point that the occupiers of the terraced properties parked on the carriageway outside where they live, and as required would also park on the western side of the carriageway, on the opposite side of the road.

The submitted TA attempts to quantify the level of kerbside parking that takes place on this section of adopted highway, but surprisingly is reliant on a single day of parking beat surveys, undertaken on Thursday 16th June 2022. There is no weekend parking beat survey presented, which would be a time when higher residential parking demand would be expected, and the potential effects of removing all kerbside parking space in this location more evident.

In this regard we would expect a more detailed assessment of the potential impacts, in terms of displaced parking to be presented, including a weekday and weekend assessment. There is also a need to confirm that in order to maintain both the eastern and western kerblines free from parking and waiting of vehicles a Traffic Regulation Order (TRO) will need to be introduced. This will need to be consulted on and progressed outside of the planning application and is of course a separate risk for the applicant if this could not be implemented, as it will be a pre-requisite of the access design.

The Need for a Comprehensive Corridor Assessment

All of the above technical matters also form part of the comprehensive review and mitigation strategy along Market Street that LCC requested at the Local Plan EiP. This is clearly set out in item (b) in the supporting wording in the RBC Local Plan allocation wording.

This review will identify all of the above matters, as well as other technical matters on the corridor, such as the existing volume of parked vehicles on the carriageway, the effect this has narrowing the carriageway width at each end of Market Street, reducing the corridor to a single lane which in turn affects the free flow of traffic on the route. The impact of the additional traffic generated by the residential allocation, along with construction traffic to the sites needs to be carefully assessed along this corridor.

Road Safety Audit

Based on the significance of the access proposals, on a strategic route through the village, there was an expectation from ECNF that as part of the technical information submitted with the planning application a Stage 1 Road Safety Audit, along with a Response Report would have been submitted.

The absence of this information, alongside the design as presented not showing the widening of the eastern footway, the “Y” distance visibility splay dimensions not being validated or a robust assessment of the level of displaced parking not being presented confirms highway safety matters have not been satisfactorily considered in the TA.

Other Access Matters

As set out earlier in this report, the expectation was that any submitted planning application would include a full and comprehensive assessment of all access arrangements to the site. At the present time the only access that has been the subject of any level of detailed scrutiny is the proposed ghosted right turn access on Market Street, whereas the TA confirms that as part of the wider assessment a vehicular access will be required from the northern development parcel onto Blackburn Road, and likewise from the southern development parcel onto Exchange Street.

The TA is also silent on the development phasing and the associated construction traffic movements associated with building out the different sites that make up the total residential allocation. We request that a clear and concise Construction Management Plan (CMP) is prepared and submitted to RBC and LCC for consideration. This document should clearly show the proposed access routes, compound locations, internal access routes and any mitigation measures required during the construction phases.

Exchange Street Assessment

ECNF has previously raised significant concerns regarding the use of this corridor approach, as matters relating to the use of Exchange Street to access the southern sector of the development allocation were flagged up during the Local Plan EiP.

The assessment presented by ECNF confirmed the eastern section of Exchange Street is narrow, experiences kerbside parking on both sides and has substandard visibility when exiting from the minor arm onto Market Street. This visibility from the minor junction arm cannot be improved due to the position of adjacent buildings in both the leading and trailing traffic directions.

This matter was identified by LCC in their submissions to the Local Plan EiP, where they stated:

“there are a number of issues with the use of Exchange Street” as a development access route.”

The matters that the Highway Authority raised at the time were:

1. The width is approximately 5 m with evidence of on street parking close to the junction with Market Street and further along which is possibly associated with the adjacent recreation ground and children's play area. This parking restricts traffic flow on the street.
2. There is no continuous footway to the site on either the north or south side of Exchange Street. There provision is considered essential for the development site to progress but may require third party land acquisition and dedication.
3. The junction of Exchange Street with Market Street is close to an existing zebra crossing and any additional movements at this junction are likely to increase the potential conflict between turning vehicles and pedestrians using the crossing facility.

At the time, the Highway Authority's solution to the use of Exchange Street as an access route was for development traffic to route via Highfield Road, The Drive and Eden Avenue to access Bury Road and Bolton Road North. These are residential streets, where on-street parking is commonplace, reducing the effective width of the carriageway and restricting the free-flow of traffic on these routes. The impact of development traffic on these corridors should also be included in the TA.

This solution has not been considered or assessed by the applicant, as the development traffic assignment shows vehicles entering and exiting Exchange Street from Market Street. We request that clarification is sought from the applicant as to their intention to use the Exchange Street/Market Street junction, and what mitigation measures will be implemented to overcome the substandard visibility for motorists exiting onto Market Street in this location.

If the applicant's intention is to close or restrict the use of this section of Exchange Street this needs to be clearly presented and the strategy for delivering this included in the previously requested mitigation works for the Market Street corridor, as requested by LCC at the Local Plan EiP. If this requires a TRO to limit or prohibit traffic from using this section of the adopted highway this should be clearly presented in the TA.

In addition, during the Local Plan EiP the site promoters discussed an alternative access strategy for the southern development site, whereby all development traffic would be routed onto the local highway network via the ghosted right turn priority junction on Market Street. Clarification is sought as to whether this is still a consideration, and if so the implications of assigning the additional development traffic from the southern development site through this access point.

Until this technical matter is resolved, and the correct development traffic assignment data prepared it is our professional opinion that the full impact of the Local Plan allocation cannot be considered.

Access Matters relating to the “North of Church Lane” Site

Alongside the lack of clarity on the proposed access strategy for the residential allocation via Exchange Street, the submitted TA is noted to be silent on the access strategy and potential impacts of the “North of Church Lane” site.

Whilst the applicant has focused heavily on assessing the development impact of the 238 residential units in the TA, we remind all parties that the allocation was made “as a whole” to avoid the potential risk of a piecemeal development assessment, which is now being played out in this review. Attempting to “salami slice” the full allocation down into smaller applications to demonstrate that there will be no material or “severe” impact (the NPPF test), is not acceptable. That is why RBC and LCC stipulated the need for the full residential allocation to be considered as a whole, as set out in their comments presented in the first page of this response.

Turning to the access arrangements for the “North of Church Lane” site, the comments made by RBC and LCC to the proposed access arrangements for this scheme are provided below, for ease of reference.

“To the north of Church Lane is a smaller site; it is proposed to form an access onto Blackburn Road in the field adjacent to 5 Blackburn Road. There are site constraints associated with any potential access namely the visibility splay in either direction and the proximity of the signalised junction consequently the junction design and positioning will need careful consideration to achieve an acceptable design” (our emphasis).

ECNF raised the technical matter in their submissions to the Local Plan in August 2019 that delivering a new development access in this location onto Blackburn Road would require on-street parking to be permanently removed, and visibility splays would need to cross the adjacent field and stone wall. The submissions also highlighted the level of existing on-street parking on this section of adopted highway generated by the local school. The point was made at the time that the on-street parking in this location will be made up of teacher and staff parking, along with parent and carer drop-off/pick up at the start and end of the school day, and that the proposed 81% increase in school capacity would be expected to increase on-street parking demand in this location, close to the existing signalised junction.

Whilst the applicant may consider their focus needs to be on presenting an access strategy and assessment of their element of the wider allocation, to accord with the RBC Local Plan allocation requirements, the scheme needs to be considered as a whole, not in smaller allocations or phases to ensure the cumulative impacts of the 400 unit allocation is appropriately assessed and mitigated.

Off-Site Modelling Appraisal

The final technical matter that we would like to raise at this point is the approach to the off-site junction modelling presented in the TA.

RBC and LCC will recall the significant amount of technical modelling work undertaken by all the site promoters on the Market Street corridor, which included detailed assessment of the Rochdale Road/Market Street mini-roundabout junction. Mott MacDonald, RBC’s own transport consultants, previously highlighted capacity issues at this junction and commented that because of the geometric alignment of the junction, and third-party landownerships around the junction there is very limited scope for any capacity improvements at this location.

At the time RBC’s transport consultants went on to say that due to capacity constraints the overall quantum of residential development in the village may need to be revisited. These capacity constraints were also highlighted in ECNF’s technical submissions to the Planning Inspector.

Based on the clear and transparent position set out by all parties above (including ECNF and the applicant’s transport consultants) through the Local Plan, the outputs from the off-site junction modelling appear to be completely at odds with both RBC’s and LCC’s agreed position. As an example in paragraphs 7.9.13 to 7.8.16 a summary of the performance of the Market Street/A680 Rochdale Road/Bury Road mini roundabout junction is provided. **Tables 7.15 and 7.16** from the applicant’s TA are provided below, for ease of reference.

Arm	2030 Sensitivity Base Flows				2030 Sensitivity 'With Dev' Flows			
	Weekday AM		Weekday PM		Weekday AM		Weekday PM	
	Max RFC	Max Queue	Max RFC	Max Queue	Max RFC	Max Queue	Max RFC	Max Queue
Bury Road (N)	0.43	1	0.29	0	0.53	1	0.34	0
Rochdale Road	0.66	2	0.55	1	0.71	2	0.58	1
Bury Road (S)	0.52	1	0.59	2	0.55	1	0.69	2

Table 7.15 Summary of ARCADY Output for the Market Street/A680 Rochdale Road/Bury Road Mini Roundabout

Arm	2030 Sensitivity Base Flows (based on 2019 surveys)				2030 Sensitivity 'With Dev' Flows (based on 2019 surveys)			
	Weekday AM		Weekday PM		Weekday AM		Weekday PM	
	Max RFC	Max Queue	Max RFC	Max Queue	Max RFC	Max Queue	Max RFC	Max Queue
Bury Road (N)	0.57	1	0.32	1	0.67	2	0.37	1
Rochdale Road	0.84	5	0.61	2	0.91	9	0.64	2
Bury Road (S)	0.54	1	0.75	3	0.57	1	0.85	6

Table 7.16 Summary of ARCADY Output for the Market Street/A680 Rochdale Road/Bury Road Mini Roundabout

For the 2030 “sensitivity test” assessment the applicant’s transport consultants have stated in paragraphs 7.9.14 and 7.9.16 of the TA:

“As can be seen, the Market Street/A680 Rochdale Road/Bury Road Mini Roundabout is forecast to operate within capacity during the AM and PM peaks during the 2030 sensitivity base scenario and will continue to experience similar levels of operation following the addition of the development and wider allocation trips.”

“As can be seen, using flows based on the 2019 survey data, the Market Street/A680 Rochdale Road/Bury Road Mini Roundabout is forecast to operate around its practical design capacity during the AM peak and within capacity during the PM peak during the 2030 sensitivity base scenario. The junction will experience similar levels of operation following the addition of the proposed development and wider allocation trips.”

These conclusions are at odds with Mott McDonald, RBC’s transport consultants and ECNF. At the time Mott McDonald concluded in their Highway Capacity Study, in section 6.5:

“The Rochdale Rd / Bury Rd junction in Edenfield was noted to be operating over capacity on the Rochdale Rd arm of the junction in the morning and the Bury Rd South arm in the evening, in the 2034 Local Plan scenario. It should be noted, as is stated in Chapter 4, that those results are providing an over exaggerated

understanding of the forecast operation of the junction, due the assessment methodology adopted, in particular the distribution and assignment element.

Consideration has been given to the formalisation of the existing uncontrolled crossing on the Bury Rd North arm of the junction into a demand controlled signalised crossing. This has been tested in the ARCADY model and the results are provided in Table 60 overleaf.”

Table 60. Junction 11 Rochdale Road / Market Street Edenfield Upgrade Option Results

Lane Description	2034 AM LP			2034 PM LP		
	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS
Bury Rd North	9.09	0.92	E	1.63	0.63	A
Rochdale Rd	27	1.04	F	3.72	0.8	C
Bury Rd South	2.63	0.73	C	54.0	1.11	F

“The results in Table 60 demonstrate that provision of a formalised signalised crossing could provide some benefit to the operation of the Bury Rd South arm of the junction, particularly during the evening peak when delay is noted to be at its worst.

It is noted that the Rochdale Rd (morning peak) and Bury Rd South (evening peak) arms are still operating over capacity compared to the Reference case position. This would suggest that further mitigation measures are required in order to deliver the Local Plan up to 2034.

In order to determine the level of Local Plan demand that the junction can accommodate, analysis has been undertaken to adjust the Local Plan traffic volumes, which have found that at 2034 the following additional demand in Table 61 can be accommodated at the junction, by turn movement. This analysis has been undertaken using the proposed controlled crossing version of the model reported in Table 60 above.”

Table 61. Junction 11 Rochdale Road / Market Street Edenfield Demand Accomodation

Lane Description to from	2034 AM LP			2034 PM LP		
	Bury Rd North	Rochdale Rd	Bury Rd South	Bury Rd North	Rochdale Rd	Bury Rd South
Bury Rd North	N/A	28	105	N/A	33	75
Rochdale Rd	48	N/A	2*	20	N/A	7*
Bury Rd South	99	7*	N/A	74	4*	N/A

* Unadjusted values

“The demands shown in Table 61 above can be accommodated by the junction if the proposed crossing upgrade is implemented. Any further demand beyond those values shown reduces the performance of the junction away from that of the 2034 Reference Case position.

Any further mitigation solutions considered valid for this junction should only be determined in consultation with LCC, given the extremely land locked nature of the junction and it’s (sic) proximity to a number of residential units.”

The capacity matter raised by Mott McDonald and ECNF at this location remains a live issue, and with the applicant’s TA providing no mitigation measures at this junction the modelling outputs appear to be at odds with other assessments undertaken to date. The approach taken by the applicant to use reduced baseline traffic flow data, to carve out capacity headroom on the network has been noted, along with the refusal by LCC to accept this approach, as confirmed in paragraph 2.3.5 in the TA, which states:

“During pre-application discussions, LCC expressed the view that it does not, at present, solely accept current traffic information as a true reflection of the operational situation of the highway network, due to the effects of Covid and the depressed levels of travel demands.”

To this end, it is quite clear that until an agreed position is reached on baseline traffic flows, the need for the assessment to consider the full allocation (including all access arrangements, implications for displaced parking), capacity assessments and the required corridor-based mitigation strategy for Market Street it is not possible for either RBC or LCC to fully assess the impacts of the proposed housing allocation.

Conclusions

On behalf of ECNF SKTP has always raised concerns with the allocation of 400 additional dwellings in Edenfield village. The point that has been consistently made through the Local Plan process is an allocation of this scale has to be supported by an appropriate level of technical assessment, review and application of due diligence.

Unfortunately the supporting information to the planning application confirms that RBC's requirements for a full, cumulative assessment of the allocation as a whole have not materialised. All the technical assessment work produced during the Local Plan process by RBC, ECNF and the site promoters confirmed there would be a material level of degradation to the performance of the local highway network through the village.

In addition, the proposed access strategy for the allocation as a whole has not been clearly set out or appropriately assessed. Examples of this include the lack of consideration of Exchange Street as an appropriate access route for the southern development parcel, a lack of information on the access strategy for the “North of Church Lane” site, and the effect of displaced parking in this location.

With regard to the proposed vehicular access strategy from Market Street, the previously identified matters of where the access arrangements should widen the eastern footway on this corridor have not been included, or justification for the use of standard “Y” distance visibility splay dimensions. We consider a more detailed assessment of the implications of the loss of kerbside parking on Market Street, in the vicinity of the proposed ghosted right turn junction, is also required and certainly needs to include an assessment of weekday and weekend parking demand, to fully understand the implications for this access strategy.

Finally, we remain of the opinion that all parties are already fully aware of the existing capacity constraints on the Market Street corridor, including the Rochdale Road/Market Street mini-roundabout junction. This was set out in supporting documents through the Local Plan process. Previous assessment work undertaken by RBC's and ECNF's transport consultants have confirmed existing and future year capacity constraints in this location, which is not borne out by the assessment work in the submitted TA.

The TA presents an approach where baseline traffic flows are reduced to carve out capacity headroom, as well as a lack of clarity on the final traffic distribution in the peak periods, with the retention and reliance on the Exchange Street/Market Street access. Further information is required on the access arrangements for the southern site and the “North of Church Lane” site, as part of the full site allocation. This raft of additional information is needed to respond to the RBC requirements for the residential allocation, which were:

- 1) *the comprehensive development of the entire site (our emphasis) is demonstrated through a masterplan with an agreed programme of implementation and phasing;*
- 2) *The development is implemented in accordance with an agreed design code;*
- 3) *A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:*
 - a. *safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;*
 - b. *agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street*

corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms. Measures to assist pedestrian and vulnerable road users will be required.

We look forward to LCC and RBC's response on the technical matters highlighted in this letter. In the meantime if you require any further information ECNF will be pleased to assist you on any technical matter.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'm. kitching', with a large, stylized flourish at the end.

MICHAEL KITCHING

Director