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Your ref: 2022/0451
Our ref: 2022/0451/HDC/RH
Date: 24/02/2023

Location: Land West Of Market Street Edenfield Bury Lancashire
Proposal: Full application for the erection of 238 no. residential dwellings (Use Class C3) and all associated works, including new access, landscaping and public open space.

With regard to your consultation letter dated 21st November 2022 I have the following initial comments to make based on all the information provided by the applicant to date and after undertaking a number of site visits.

Lancashire County Council as Local Highway Authority (LHA) is responsible for providing and maintaining a safe and reliable highway network. The County Council is also committed to reducing congestion and delay and improving highway links both locally and strategically. With this in mind the present and proposed traffic networks have been considered which are influenced by this proposal.

Introduction

The proposals as submitted form part of the allocated site H66 'Land West of Market Street, Edenfield' within the Rossendale Local Plan 2019 to 2036. The submitted layout plan shows 238 dwellings, which will be accessed via a new junction located on Market Street.

The site is located within the village of Edenfield, bounded by Market Street to the east and the A56 to the west.

A total of 400 dwellings have been identified within the Rossendale Local Plan for the wider site. It is envisaged that all these dwellings would be delivered over three separate land parcels:

- Land west of Market Street, (Taylor Wimpey)
- Land off Exchange Street (Anwyl Land)
- Land to the west of Blackburn Road, (Peel L&P and Richard Nuttall)

Summary

The proposed development is currently unacceptable to the LHA. As detailed below, the planning application fails to demonstrate that the proposed development can be fully and appropriately integrated into the local environment without a significant negative impact on the local and wider highway network, and that its impacts without appropriate mitigation would be unacceptable in terms of highway safety and sustainability. This is contrary to the National Planning Policy Framework (NPPF).

Masterplan

The Rossendale Local Plan 2019-2036 was adopted in December 2021. Policy HS2 lists allocated housing development sites. Land west of Market Street is included as allocation H66 which is covered by a site specific Policy.

Policy H66 states: Development for approximately 400 houses would be supported provided that:

1. The comprehensive development of the entire site 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:
 - i. 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;
 - ii. 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 Highway Authority is of the opinion that the above has not been provided within the submitted documentation for this application (or within the Masterplan and Design Code application). Due to the known local sensitives/issues Lancashire County Council Highways would have expected that the wider Masterplan with a detailed Transport Assessment would have informed all individual applications.

The above requirement was to ensure that any assessment of the H66 (400 residential unit) allocation was considered in its entirety. This was to avoid a piecemeal approach to assessing the impacts of development.



The submitted Transport Assessment with this application (14/2022/0451) focuses on the assessment of the impact of developing 238 residential units, with only a light touch on the full allocation of 400 units. The TA does include a sensitivity assessment for the additional allocations on Blackburn Road and Exchange Street, however this does not include a full assessment of key junctions and access points for the full allocation as required in the above policy.

Appropriate measures must be put in place to address any impacts the full allocation may have on the strategic and local road networks. This must cover the details outlined above in the 3 points of Policy H66. The full allocation needs to be considered as a whole, not in individual phases this is to ensure the cumulative impacts of the full 400 unit allocation is appropriately assessed and mitigated against.

Site Access for the 238 units

The proposed location of the sites access from Market Street is acceptable in principle however the following concerns need to be addressed:

1. As part of the access works a 2m wide footway is requested on both sides of market Street to ensure that all footway users have an appropriate width to pass. The need for the 2m footways is intensified by the permanently removal of kerbside parking on this section of Market Street to provide the running lanes and the right turn facility. All southbound traffic will run adjacent to the 1m footway and the front of the residential properties on the eastern side of Market Street, thus creating an unappealing route for all footway users.
2. A Pedestrian refuge is required to protect the right turn lane and provide a crossing point on Market Street.
3. The bus stop located adjacent to the proposed new access will need to be relocated. Lancashire County Council would also request that the stop serving the south bound services located adjacent to Elizabeth Street is upgraded, this stop may also need to be relocated as part of its upgrade.
4. To protect the visibility splays and the right turn lane, waiting restrictions along the site frontage will be required.
5. The level of parking within the development to offset the lost existing residential parking on Market Street due to the proposed junction works seems to be at an inappropriate level. This is based on our observations and the limited parking survey contained within the submitted Transport Assessment. The survey was only undertaken on one weekday (Thursday 16th June 2022), an additional weekend survey would have assisted in providing a more robust picture.

The LHA also do not support the approach proposed to offset the parking in the form of a parking layby on the main access road to the development. A designated car park served from the new access road, located in a convenient location for the existing residents on Market Street is requested. The proposed parking area would need to be managed long term by the developer/management company and have no restrictions.



6. The alterations to the existing highway as part of the new works will require changes to the existing street lighting, road signage and road markings (TRO's) at the expense of the client/developer.
7. The submitted plans indicate a highway link to the adjacent Exchange street allocation. Clarification is requested if this is to be an open connection for all road users or just emergency access. If it is to be an emergency access only, details of how this will be managed needs to be included within the application

As set out earlier in this report, the expectation was that any submitted planning application (and masterplan) would include a full and comprehensive assessment of all access arrangements to the full allocation (400 units). At the present time only the Market street access has been detailed.

Internal Layout

1. The submitted plans indicate that the internal roads are a mixture of 5.5m and 4.9m widths. To be considered for adoption Lancashire County Council request a carriageway width of 5.5m with 2m wide footways.
2. On the submitted 'Adoptable Highway Plan' Some of the private access drives have been shaded up to be adopted (Plots 118-123, 129-132). Lancashire County Council would not adopt any private shared drives.
3. A number of plots as shown on the submitted plans fall short of the recommended parking provision:
 - One-bedroom properties to have 100% parking.
 - Two to three bedroom properties to have 200% parking
 - Four to five bedroom properties to have 300% parking.

(i.e. House type EMAP 41 – 4 bed, only 2 parking spaces have been provided for each plot).

The following also needs to be taken into account when calculating parking provision:

- The minimum dimension for a parking bay needs to be 2.4m wide by 4.8m long. In addition to this private drives require a minimum width of 3.2m where they are used for vehicular access and pedestrian access to the property.
- It is recommended that all private drives fronting garages to be a minimum of 6m long and this must not include any of the required 2m wide service verge. The drive length can be reduced to 5.5m if roller shutters are fitted and conditioned as part of the planning decision. The recommended distance of 6m is based on the length of a large family car (Ford Mondeo Estate 4.58m long), clearance at the rear of the car (200mm), overhang of the garage door (600mm) and room to stand in front of the car and open/close the garage door (600mm).



- The recommended minimum internal single garage size to be 6x3m and this includes integral garages. Where garages are smaller than the recommended minimum internal dimension of 6 x 3m they should not be counted as a parking space and the applicant should provide an additional parking space for each garage affected.
4. All the proposed turning heads within the site need to be proven by swept path analysis for a twin axel refuse vehicle.

Modelling

As highlighted earlier within this response the Highway Authority considers the area around this proposed development as sensitive with issues that will need to be overcome for the full allocation, especially regarding:

- The operation of the Market Street/A680/Bury Road mini roundabout
- The impact on Market Street for all highway users.

As part of the Local Plan process, modelling work was previously undertaken on the Market Street Corridor including the Rochdale Road/Market Street mini-roundabout junction. This identified existing and future year capacity constraints in this location, this is not presented or mitigated against within the submitted Transport Assessment.

The applicants Transport Assessment states in section 7.9.14 that:

'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'.

These modelling outputs submitted with the Transport Assessment appear to be at odds with the previous assessments undertaken.

Sustainable Travel

Service X41 now operates in partnership between Lancashire County Council and Transdev, the service is not fully commercially viable with the county council providing a subsidy to maintain the service levels. Therefore to assist in securing the long term viability of this service and to support sustainable travel from this site Lancashire County Council is seeking a section 106 contribution to support an appropriate evening and weekend service. This figure is likely to be in the region of £50,000 per year for 5 years.

As mentioned previously a bus stop located adjacent to the proposed new access will need to be relocated and upgraded. Lancashire County Council would also request that the stop serving the south bound services located adjacent to Elizabeth Street is upgraded, this stop may also need to be relocated as part of its upgrade.

In line with government policy I would expect the development to provide electric vehicle charging infrastructure at appropriate locations for each dwelling (consideration should



also be given to electric vehicle charging infrastructure for the required car park for existing residents of Exchange Street).

A cycle storage strategy has been demonstrated within drawing MAN-0299-011.

On a development of this size and nature Lancashire County Council Highways request that a Travel Plan is submitted. As part of this we would normally request a section 106 contribution of £12,000 for a development of this size to enable Lancashire County Council to monitor and support the development, implementation and review of the Travel Plan for a period of up to 5 years.

The Travel Plan submitted as part of the planning application meets our submission criteria for an Interim Travel Plan. It is important that any Interim Travel Plan is adhered to, and a Full Travel Plan is developed and implemented in line with the agreed timescales.

A Full Travel Plan when developed would need to include the following as a minimum:

- Contact details of a named Travel Plan Co-ordinator
- Results from travel survey
- Details of cycling, pedestrian and/or public transport links to and through the site
- Details of the provision of cycle parking.
- Objectives
- SMART Targets for non-car modes of travel, taking into account the baseline data from the survey
- Action plan of measures to be introduced, and appropriate funding
- Details of arrangements for monitoring and review of the Travel Plan.

The proposed development site includes two Public Rights of Way (FP126 and FP 127) I understand that Lancashire County Councils Public Rights of Way Section will provide comments directly to the Local Planning Authority.

Sustainable Urban Drainage Systems (SuDs)

Sustainable Urban Drainage Systems (SuDs) - Lancashire County Council are now the Lead Local Flood Authority (LLFA), as such LCC Flood Risk Assessment Team will provide detailed comments during the planning process under a separate response.

The application should consider the requirements likely to be asked for in support of a SuDs drainage scheme, if deemed necessary. These considerations may significantly affect the site layout/design to include for the likes of swales, storage ponds etc. to control run off rates in accordance with SuDs guidance.

The applicant is advised that highway surface water drainage system must not be used for the storage of any flood waters from the adoptable United Utility surface water system, or any private surface water drainage system. In general, Lancashire County Council will seek to limit the use of culverts where alternative sustainable solutions can be found.



The submission of engineering and constructional details together with the extent of adoption should be agreed in principle by the developer and Highway Authority at the reserved matters planning stage.

Conclusion

As part of the Local Plan process concerns/issues were identified regarding the impact the allocation would have on the existing highway network

Policy H66 states: Development for approximately 400 houses would be supported provided that:

1. The comprehensive development of the entire site 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:
 - i. 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;
 - ii. 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 Highway Authority is of the opinion that the above has not been provided within the submitted documentation for this application (or within the Masterplan and Design Code application). Due to the known local sensitives/issues Lancashire County Council Highways would have expected that the wider Masterplan process would have informed all individual applications within this Allocation.

The submitted application only considers the access strategy for the proposed 238 units and not the allocation as a whole. There is a lack of consideration of the accesses for the Exchange Street and Blackburn Road phases.

As part of the Local Plan process, modelling work was previously undertaken on the Market Street Corridor including the Rochdale Road/Market Street mini-roundabout junction. This identified existing and future year capacity constraints in this location, this is not presented or mitigated against within the submitted Transport Assessment.

The Highway Development Control section of Lancashire County Council object to the application as it has been presented. The planning application fails to demonstrate that the proposed development can be fully and appropriately integrated into the local environment without a significant negative impact on the local and wider highway network, and that its impacts without appropriate mitigation would be unacceptable in terms of



highway safety and sustainability. This is contrary to the National Planning Policy Framework (NPPF).

Should our concerns raised above be allayed we may be in a position to withdraw our objection to the application.

If you have any questions regarding my comments please do not hesitate to contact me.

Yours sincerely

Rob Hancock
Highways and Transport

