

**EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM (ECNF)  
JULY/AUGUST 2023 CONSULTATION TRAFFIC SUBMISSION re  
TAYLOR WIMPEY MASTERPLAN and PLANNING APPLICATION  
2022/0451**

GENERAL

An initial point to appreciate is that the issue of transport/traffic in conjunction with the H66 site has been raised many times by ECNF over recent years, in particular the need for firm proposals. It is true that the recent submissions have, at long last, provided some more detailed information but it is still very much short of a comprehensive plan. In many ways little has changed and the concerns raised both by ECNF and Edenfield residents still apply such that comments and objections previously made are still relevant and should be considered alongside any further comments/objections submitted in response to the latest proposals.

The comments in this document have been produced to reflect the views of Edenfield residents and are supplemental to the more technical points made on behalf of ECNF by SK Transport. A Residents event was held in the Edenfield Community Centre where feedback on the proposals was requested either verbally or in writing. The responses received in writing are attached to this submission (names and addresses have been redacted for the purposes of maintaining privacy).

PUBLIC TRANSPORT

There seems very little information supplied on the issue of Public Transport other than that it is clear there is no intention of expanding bus routes into the new areas of housing. The only actual comment made in respect of Public Transport is that the Pilgrim Gardens bus stop is to be moved to an unidentified location which, realistically, means it is to be removed altogether. No new facilities other than houses, roads and a small car park are proposed so all requirements of the new residents will involve off site travel. Whilst there are bus services through the village the usage thereof is very low compared to car usage. This position will deteriorate further with houses some distance from bus stops, one bus stop to be, at best, moved to an inconvenient location and the opportunity being missed to improve local facilities such as healthcare, schools (as far as this application is concerned) and retail outlets.

TRAFFIC CENSUS

It is noted that a Traffic Census was undertaken in April 2023. It is really not helpful to the credibility of the data collected that it doesn't cover a whole seven day period of activity. What about Monday, considered by many to be the busiest travel day and what about Sunday, the busiest day in Edenfield for on street parking?

There is also concern that "It is anticipated that the allocation will be completed by 2030" (paragraph 1.15 of the Highways Consideration of Masterplan). This seems extremely optimistic and it is felt that a more realistic view would be achieved by using 2040.

A further concern is that to predict trip rates "the highways officers at LCC have requested that the trip rates as per those used for North-West Preston should be adopted" (paragraph 1.25 of the Highways Consideration of Masterplan). The comparison area needs to be identified more specifically for any meaningful interrogation as to its suitability to be used in the case of Edenfield. A general comment at this stage would be that the North West Preston area seems potentially to be much more of an urban area than Edenfield and is likely to be far better served by bus and rail services than those available to residents of Edenfield. As such there is concern that the number of projected additional vehicle journeys is being underestimated.

### MARKET STREET

As is well documented the Market Street corridor in Edenfield is a funnel for traffic with routes in the South converging from Rochdale, Bury and Ramsbottom at the Market Place mini roundabout and with routes in the North from Haslingden and Rawtenstall converging at the traffic light junction close to the primary school and church. If the A56 is closed, blocked or experiencing slow movement then traffic leaves the A56 and the only viable alternative route is through Edenfield.

At the Southern end of Market Street are local businesses (including a bakery, butchers, two hairdressers, pharmacy, food takeaway and The Rostron Arms public house). Along Market Street are the Drop Off Café and several other businesses located in the former Co-op building. At the Northern end are The Coach public house/restaurant, the local primary school and Grade 2\* listed church. Market Street is mainly a street of traditional terraced properties many of which do not have private parking arrangements and consequently on street parking is essential for residents to safely and comfortably enjoy their homes. This road has the highest level of traffic use in the vicinity of the H66 site but is

a B road in terms of its standard classification. However it is part of Lancashire County Council's Resilient Road Network and is the only route available for local traffic to journey from North to South of Edenfield and vice versa. It is a bus route, gritter route, refuse collection route, cycle route and, as well as motor cars, is used by agricultural vehicles, delivery vehicles, post office vehicles, milk delivery vehicles, heavy goods vehicles both on Market Street itself and for obtaining access to adjacent minor roads. It will also have to deal with construction traffic for the Taylor Wimpey site and potentially some of the construction traffic for other H66 sites. This usage is in an area that is the location of a considerable number of residential properties which, due to their high density level, generate a high number of both vehicle and pedestrian journeys.

Into the above scenario it is proposed that 400 dwellings be constructed immediately to the West of Market Street of which approximately 240 will access on/off Market Street by way of a single access point. There are also proposals in the near vicinity of the Taylor Wimpey site access point for a further 18 properties needing vehicular access onto Market Street from the site at Alderwood (planning application ref 2022/0577) and the site opposite Alderwood referenced as H65 in the Rossendale Borough Council Local Plan. The Applicant has rightly recognised the enhanced importance of Market Street by including in its proposals a gateway feature at either end. Taking all these factors into account **Market Street should not be regarded as low traffic residential estate route and therefore the very best design practice should be followed in respect of any proposed changes.**

In and within fairly close proximity to Market Street are approximately 600 dwellings. The proposed Masterplan under consideration involves the construction of about 400 new dwellings so a simple calculation indicates that traffic usage originating in the immediate vicinity will increase by 50% so a considerable intensification of usage on all local roads and junctions in respect of both vehicle and pedestrian journeys.

As reported in the SK Transport submission for ECNF a traffic survey in 2019 indicated about 8000 vehicle movements along Market Street per day. The information submitted by Eddisons (weekday am surveyed peak flows) indicates about 1500 vehicle movements between 7.45am and 8.45am and that 90%+ of these vehicle movements are in respect of through traffic. Some movements (maybe 5%) arise from residents departing from a parked position on Market Street and some movements (maybe 2.5%) arise from vehicles joining from side

streets (Exchange Street, Gincroft Lane, Heycrofts View, Alderwood Grove, East Street and Church Lane and from land situated between terraced blocks of houses used for parking and in the case of 51 to 77 Market Street garages located behind the terraced housing.

The above indicates Market Street peak am traffic of one vehicle every 2.5 seconds (3600 seconds divided by 1500 movements) most of which travel the whole length of the road. Traffic joining Market Street arises at the rate of about one every 90 seconds (3600 seconds divided by (1500\*2.5%)) which residents advise is already very difficult to safely achieve. The TW site is projected to generate an extra 107 weekday am departures onto Market Street so one vehicle about every thirty seconds (3600 seconds divided by 107) which raises the issue of how this will be achieved safely.

#### HIGHFIELD ROAD PARKING

Highfield Road and adjacent/connecting roads (Eden Avenue and The Drive) are also residential locations and were designed as access routes for local residents to their homes and not as thoroughfares for traffic to/from other areas. The number of houses in this area is approximately 180. No information has been provided on the number of new dwellings proposed for this area but a figure of 90 has been previously mentioned so a likely increase in journeys of 50%. There is, therefore, concern that significant additional traffic will arise on these routes from the Anwyl site which may affect safety and the availability of on street parking.

It is noted that details of current parking capacity for Highfield Road have been supplied in Appendix 1 of the Response to LCC Report Note. There is no reference to this location in the Highways Consideration of the Masterplan document. In view of the increased traffic which will arise from the Anwyl site on Highfield Road (and also Eden Avenue and The Drive) it seems reasonable to expect to see in the Masterplan the information to support the conclusion that these roads can cope with the increased traffic expected and retain all existing on street parking. This needs to be part of the Masterplan and not something left to be found necessary at some future date.

#### EXCHANGE STREET

The proposal to make it one way is presumably in recognition that exiting onto Market Street, close to the pedestrian crossing and where there are severely restricted views, is far from ideal. There also seem to be parking proposals but these are far from clear but, based on the faint yellow line shown on the

Applicant's Proposed Highways Improvement Plan document, seem to involve the loss of residents' on street parking. Sadly the proposals on this corridor are far from clear and again the credibility of what is proposed is not helped in that the Proposed Highways Improvement Plan document does not include the Edenfield Pump (bike/skateboard) Track and its entry/exit onto Exchange Street. In respect of the Pump Track it should be noted that it has proved very popular and this means more cyclists using not only the Track itself but also the local road network, in particular Exchange Street, Highfield Road, Bolton Road North and Market Street.

#### EXCHANGE STREET JUNCTION WITH HIGHFIELD ROAD AND ANWYL DEVELOPMENT

It seems likely that this junction will see a significant increase in activity. Using the figure of 90 as the likely number of dwellings which may be built on the Anwyl site it is thought that a fair rough estimate of the number of daily journeys passing through this junction would be approaching 500. There are serious concerns about its direct proximity to the Pump (bike/skateboard) Track (in particular its entry/exit point) and close proximity to the Childrens' play area and Recreation Ground. The Forum believes this arrangement should be considered as a brand new junction and potentially would fail a Road Safety Audit so therefore such an audit should be undertaken before any Masterplan/Planning Application is considered any further.

#### BURY ROAD/BOLTON ROAD NORTH

As with the Highfield Road area, issues in connection with Bury Road and Bolton Road North appear to have been ignored. These routes are also the location of terraced properties and similar issues arise for residents as for those on Market Street. These areas should be considered as part of the Masterplan process and issues of traffic flow and parking resolved now.

#### MARKET PLACE MINI ROUNDABOUT

This is already a busy junction at peak times and has to accommodate traffic on the Primary Route (A680/A676) and Lancashire County Council's Resilient Route Network. In view of the increased traffic arising from the proposed three new significant developments in Edenfield it seems reasonable to expect a Road Safety Audit to have been performed on this location at the Masterplan stage to demonstrate its ability to operate safely by reference to current standards. Issues already arise in respect of (i) the pedestrian crossing near to this junction

(ii) queuing traffic arising on the approach from Rochdale Road (iii) traffic leaving the junction struggling to travel south down Bury Road (iv) visibility issues for traffic arriving at the junction from Rochdale Road (v) visibility issues for traffic arriving at the junction travelling north from Bury Road and (vi) difficulties experienced by heavy and sometimes quarry vehicles turning from Rochdale Road into Bury Road and vice versa.

### FOOTPATH 126

This footpath (from Market Street, west past Mushroom House and across the centre of the Taylor Wimpey site and then by bridge over the A56 to farmland and properties at Alderbottom) is likely to be used to a much greater extent than at present such that its mixed use by vehicles and pedestrians is likely to cause safety issues. To reiterate information previously supplied the first part of Footpath 126 is used by Mushroom House as its access route. In addition there is farmland and two residential properties (Alderbottom Farm and Swallows Barn) situated on the west side of the A56 which use the whole length of Footpath 126 as an access route.

In addition no consideration appears to have been given as to how Footpath 126 will interact as it crosses the North/South traffic primary vehicle access road which the Adoptable Highways Plan indicates will take place adjacent to the point an East/West estate road also crosses the primary vehicle access road. What will stop residents from the Taylor Wimpey site accessing Footpath 126 with vehicles to access Market Street especially at busy times?

### MARKET STREET PARKING

It is disappointing that the Highways Consideration of the Masterplan makes almost no comment on the issue of increased parking restrictions on Market Street other than to indicate that they are proposed. Similarly, the Response to LCC Report Note document also makes very little reference to parking issues other than to repeat the information in the Highways Consideration of the Masterplan and provide in Appendix 1 some Google Earth screenshots of various parking zones and a summary of the Total Number of Spaces (337) broken down into 21 zones of which 10 are on Market Street. Reference is made to parking survey data in paragraph 1.18 which is that presumably on page 66 but no interpretation thereof appears to have been made.

Of the ten existing parking zones on Market Street it seems that it is proposed three will be lost (E, I and M) involving 51 spaces out of a total of 147 so roughly 35%. It is acknowledged that three new parking areas are proposed. However

two of these (on Burnley Road adjacent to the school and at the bottom of Exchange Street) are geographically removed from Market Street and there is very little detail as to how these will be delivered. A third parking area is proposed with thirteen spaces in the field adjacent to the Taylor Wimpey site access road. This is certainly more relevant to Market Street residents but it will not replace the on street parking they have enjoyed over many decades outside their front door. The provision of only 13 spaces is also clearly inadequate especially when some spaces may well be used by visitors to the Taylor Wimpey properties, some may well be used by day commuters from elsewhere using bus services from Edenfield to travel to work and some may be used by visitors to The Coach/The Drop Off Café. Furthermore the 13 spaces proposed are located in an unsecure open area with limited lighting and there are no spaces identified for use by those with disabilities.

It is also unrealistic to rely on parking restrictions in a heavily populated residential area to improve the flow of traffic and/or improve traffic safety since such restrictions do not apply to blue badge holders/those dropping off or picking up passengers/those unloading/loading or, in practice, to those ignoring the restrictions especially for short periods of time.

The use of the above mentioned field for a parking area detracts from the Applicant's claim that it represents an open space and it may adversely interfere with the operation of the Market Street junction (see below). There is also the issue of electric vehicle charging facilities to which, in the not too distant future, access will be required for all residents.

### MARKET STREET JUNCTION

This is the most significant change proposed and involves a priority right turn to ease traffic flow. Traffic will enter from both directions on Market Street onto the proposed Taylor Wimpey development. A detailed plan of the proposed layout is included at page 18 in the Response to LCC Report Note. Yet again, it is not helpful to the credibility of this document that it is out of date as it does not include the properties located very close by to the proposed junction at Pilgrim Gardens or the junction from Pilgrim Gardens onto Market Street.

The site access is proposed to be directly opposite an access area (adjacent to 102 Market Street) to properties opposite the proposed junction on the East side of Market Street. How is this access area supposed to operate when travelling northbound along Market Street without potentially encountering a vehicle in the ghost island of the site access? This will result in crashes!

The site access is also very close to private driveways located at 98/100 and 115 Market Street. These driveways are narrow and not easy to enter/exit at the best of times so the proposal that residents at these locations will also have to deal with the effects of increased traffic and a right turn junction is most unwelcome and potentially dangerous. Similar issues also arise in respect of vehicles using the Footpath 126 exit onto Market Street and such issues may also affect vehicles using the Alderwood Grove and Pilgrim Gardens junctions.

A number of houses get their bins collected from the roadside end of the above mentioned access area (adjacent 102 Market Street) once a week. The refuse vehicle would have to park in front of the pedestrian crossing (blocking the road), putting residents in danger as pedestrians would no longer be visible using the pedestrian crossing. This must be a highly dangerous arrangement.

The site access is proposed onto Market Street, a highly trafficked, heavily parked upon, Designated Diversion Route for National Highways (when the A56 shuts), informal diversion route for modern sat navs when the A56 is experiencing slow traffic and key route for the many agricultural and large vehicles in the area. Market Street is also a bus route, gritter route, refuse collection route and key route for cyclists that is used by both commuters and for recreational purposes (being a hub for mountain biking in the area and also the location of the Drop Off Café a destination specifically promoted as cycle friendly).

A site access from a heavily trafficked road into a development of such a large scale should be constructed to meet the very best design practice. If Rossendale Borough Council/Lancashire County Council don't ensure that this is the case, they are putting the lives of residents, vulnerable road users (cyclists) and pedestrians including the primary school children (accessing the school just 250m from the site access), at serious risk/danger of fatalities. In particular it has been suggested the following should occur:-

- Due to the number of houses on the site and the number of vehicle trips per day generated the site access must have an absolute minimum of a 35m ghost island.
- The access must have safe crossing for pedestrians and therefore must provide a minimum 2m wide pedestrian island, both across the access and across Market Street

- Due to Market Street being a Bus Route, Refuse Collection Route, Heavy Goods Route, Agricultural Vehicle Route, Strategic Highway Diversionary Route, and Gritter Route, the through lanes of the ghost island must be at or near the maximum width of 3.65m in order for buses/commercial vehicles to pass safely
- The eastern side footpath needs to be widened to 2m to allow safe usage.
- Any changes to the western side footpath need to adhere to it being 2m wide.
- The priority turning lane must be a minimum of at least 3m wide.
- Because Market Street is a 30mph route, all tapers should be a minimum of 1:20.

All of the above are the **absolute minimum requirements** that need to be achieved

for the traffic types involved on Market Street and must be able to fit into the development or adopted highways. **UNDER THE CURRENT PROPOSALS THESE MINIMUM REQUIREMENTS ARE CLEARLY NOT ACHIEVABLE.**

The sketch below shows the absolute minimum design requirement on the (out of date but as used by the Applicant) OS mapping and the site layout. The area hatched in red is where the ghost island would have to tie into in advance of the junction. The areas hatched in blue/red shows where the widening would need to run through private houses. The minimum requirement would be extended far beyond this and is outside of the development and adopted highway. It is thought the current proposals would fail a Road Safety Audit so therefore such an audit should be undertaken before any Masterplan/Planning Application is considered further.



Lancashire County Council/Rossendale should not approve the current proposed layout because they would be approving of something that is undeliverable and is going to potentially result in serious injuries and even DEATHS!!!!

If Rossendale Council/Lancashire County Council are to truly maintain the safety of their road users and residents, they must not just accept the minimum design requirements, but they should be requiring a 3m wide ghost island, with a 45m long access and with maximum width through lanes and a 3m wide pedestrian island.

### MARKET STREET/CHURCH LANE/EAST STREET/BLACKBURN ROAD/BURNLEY ROAD

Obviously a complicated area of the road network already partly controlled by traffic lights, adjacent to the church/primary school and subject to heavy on street parking especially at school opening/closing times (subject to a potential significant increase if, as may occur, the school is expanded to accommodate additional children from the H66 development). A proposed uncontrolled crossing is suggested presumably in response to increased traffic and increased

numbers of school children needing to cross the road at this location. However the design of the crossing will potentially interfere with the ability to enter/exit East Street and Church Lane.

It is acknowledged that additional parking is proposed adjacent to the school accessed from Burnley Road but this creates a further junction close to the existing junction. It also would be located in a Green Belt area and is not in accordance with the Local Plan. It is also doubtful whether it would provide sufficient parking to deal with the needs of parents/carers at the beginning/end of the school day.

None of the above is considered in the revised Masterplan when what is required is a detailed analysis, reasoned proposals and a safety audit of such proposals.

#### EQUALITY ACT/HUMAN RIGHTS etc

Residents are feeling badly treated over the whole process and that much of the current proposals are focused on the needs of potential new residents to the extreme detriment of current residents. Surely existing residents should be considered equally alongside new residents.

There is no indication as to how long construction work will take and no plan in respect of phasing construction work or for how the village will cope with such work on three and up to possible five different sites at the same time (and also quite likely coinciding with significant construction work very close by to be undertaken by United Utilities on the Haweswater Aqueduct). Such an imposition seems totally unreasonable and contrary to the right to a peaceful enjoyment of an individual's property.

There is also no plan as to how construction traffic will be managed and how Blackburn Road, Market Street, Bury Road, Bolton Road North, The Drive, Eden Avenue and Highfield Drive will cope with heavy goods vehicles trying to access the various construction sites all potentially at the same time. The village has already had to deal with significant disruption as a result of construction works at Pilgrim Gardens and on Rochdale Road which have yielded less than 20 properties. It is now faced with years of disruption, noise, road chaos and pollution followed by parking restrictions, one way street arrangements, more traffic on already congested roads, safety issues and local education/health services being overwhelmed.

There is, or there is certainly perceived to be, discrimination against existing residents in respect of the proposed parking arrangements (and in respect of other issues) which may contravene the provisions of the Equality Act 2010.

The hardship caused by the removal of on street parking (and indeed other aspects of the proposals put forward) could also be a breach of the Human Rights Act 1998. These issues need to be addressed. It is appreciated that the rights of the individual (or group of individuals) has to be balanced against the public good but the proposals as put forward are considered to be too much weighted in favour of development. Many residents feel that, in overall terms, the public good could be better served by much less development in Edenfield and development elsewhere on more suitable sites.

As a Public Body it is incumbent on RBC that at the appropriate time it will review these issues in the prescribed manner as part of its decision making process.

#### SUMMARY

- Still no Masterplan other than in name only.
  - Credibility issues in respect of key documents.
  - Insufficient consideration of traffic/transport issues on a holistic basis.
  - Insufficient details in many respects.
  - Road safety concerns.
  - Pedestrian safety concerns.
  - Market Street proposed junction fails to comply with regulations.
  - Unfair treatment of existing residents in respect of on street parking.
  - High levels of construction traffic on busy roads in existing residential areas.
  - Overall impact causing excessive hardship for existing residents.
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- 11 August 2023 compiled by M J MacDonald on behalf of Edenfield Community Neighbourhood Forum based on feedback and comments received from Forum members and the residents of Edenfield.

#### **APPENDIX attached**

Written comments from attendees of residents' event held 15<sup>th</sup> July 2023.