

Rossendale Borough Council  
Room 120  
The Business Centre  
Futures Park  
Bacup

9 August 2023

Dear Sir/Madam,

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

We are writing to you again on behalf of the Edenfield Community Neighbourhood Forum (ECNF), following the submission of a revised 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.

You will recall we wrote to you in January with our technical review of traffic and transport matters, the majority of which covered the information requests that were set out in the Local Plan Examination, alongside the volume of additional questions and information that the Inspector requested on the proposed housing site allocations during the life of the Examination.

We made the point at the time that the level of additional information requested by the Planning Inspector at that time on fundamental technical matters did not inspire confidence to the group that the Draft Local Plan, which has now been adopted, has been assembled in a robust and accurate way. The group's position remains unaltered now that the above planning application has been submitted. Even with the submission of additional technical information there are a significant number of technical matters that have not been addressed and, in our professional opinion mean the application cannot be determined in a positive manner. We expand on these technical points later in this formal response.

As a reminder RBC, as the Local Planning Authority, were very clear that with regard to traffic and transport matters the residential development proposals could only 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.”*

In our previous response we, along with a number of other consultees set out our frustrations with respect to the level and quality of supporting information contained within the original planning application. 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.

Alongside the ECNF’s formal representations to the application, we are but one of a number of consultees who have questioned the level and quality of supporting information submitted with the planning application. To date other negative traffic and transport responses to the application have been received from:

- Rossendale Borough Council - Planning Department
- Lancashire County Council - Highways Department
- National Highways
- Bury Council

The frustration here is that the LPA set out exactly what was required in terms of a comprehensive masterplan, a Design Code, a Transport Assessment covering an impact assessment of both the 238 residential units and the other allocated residential sites, along with clear and concise information on the access strategy for the development. Even now, after the second tranche of technical traffic and transport information has been submitted with the application there are technical queries and information gaps that have to be addressed to meet both RBC and LCC’s requirements.

This formal response has been prepared by SKTP to assess the additional 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**

As set out in our January 2023 submission 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 masterplan was expected to show:

- a) a comprehensive access strategy for the whole site, for all travel modes
- b) detailed assessment of all access points 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

The level of disappointment from ECNF that the applicant failed at the first hurdle to present this information in their September 2022 planning application was set out in our January 2023 response.

The latest technical submission does now include a Masterplan and Design Code, prepared by Randall Thorpe in June 2023, nine months after the original information was submitted to the LPA. Whilst this additional level of information is welcomed, the detail contained within it raises a number of questions, including:

- the detail of the main site access onto Market Street
- the delivery of the emergency access from the Taylor Wimpey to the Anwyl development parcel
- the corridor strategy for pedestrians, cyclists, buses and vehicular traffic on Market Street
- the delivery of the above-mentioned works as part of the various residential development proposals

As set out on page 46 of the Design Code the off-site highway improvements are directly linked to the residential allocation as a whole, and as such it is not possible to rely on the approach set out by the applicant, where they have stated:

*“...off-site highway improvement measures which will be delivered alongside the development of the H66 allocation site (in line with criterion 3ii of Policy H66). Full detailed proposals will be worked up as part of subsequent individual planning applications.”*

Put simply, if the development is reliant on the off-site highway works to deliver a safe and appropriate access from the Market Street corridor then a detailed design, that can be properly assessed needs to be clearly presented in the submission. The various elements of the strategy need to also be linked to the different development parcels too.

For example, the Taylor Wimpey development parcel is clearly linked to the need to develop a new on-street parking strategy on Market Street, but the submission documents offer no clarity over what off-site works will be delivered at each phase of the overall allocation works. Clarity is sought on this matter, along with confirmation on the detailed proposals for this corridor. Until this level of detail is provided the impacts and mitigation strategy cannot be fully assessed and confirmed.

Further detailed comments on the additional submission information is provided below.

### **Vehicular Access Matters – Market Street**

The additional technical submissions provide further clarity of the Taylor Wimpey access strategy from Market Street. The scheme presented in the Design Code and on drawing 3806-F04 H show the access proposals but fail to take on board a number of the technical design points that were raised in January 2023 that should have been incorporated into the scheme.

We present the key design points again that need to be shown with the access design.

### **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 3806-F04 H continues to omit 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 and should be a requirement of any access design proposal.

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 latest proposals showing on-street

parking formalised on the eastern side of Market Street. As proposed, the parallel parking bay, when used, will involve passengers opening vehicle doors onto a narrow 1m footway.

As previously set out this footway should be widened to 2m, to provide an appropriate width for pedestrians, and also a corridor that when used by motorists for parking will allow car doors to open across the footway without interfering with pedestrian access. As part of the overall junction design this pedestrian corridor improvement should be included, as the 'golden thread' of the NPPF is to promote sustainable travel. The applicant is of course fully aware of the requirement to enhance access by sustainable modes, as they reference Local Transport Plan (LTP) 3 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 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.115 Market Street. We reiterate the need for this to be checked and confirmed in the submission documents.

### **Junction Visibility Splay Validation**

In our previous submission it was recommended that the "Y" distance visibility splay dimensions should be calculated using recorded 85<sup>th</sup> percentile speed survey data, in line with CA185. With no speed survey data presented in the TA or additional submission documents there is still 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. The ECNF look forward to reviewing this data when it becomes available.

In the absence of any evidence presented by the applicant to date, 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 85<sup>th</sup> 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, to achieve the required running lane and right turn pocket lane widths, as set out in CD123 Geometric Design of At-Grade Priority and Signal Controlled Junctions.

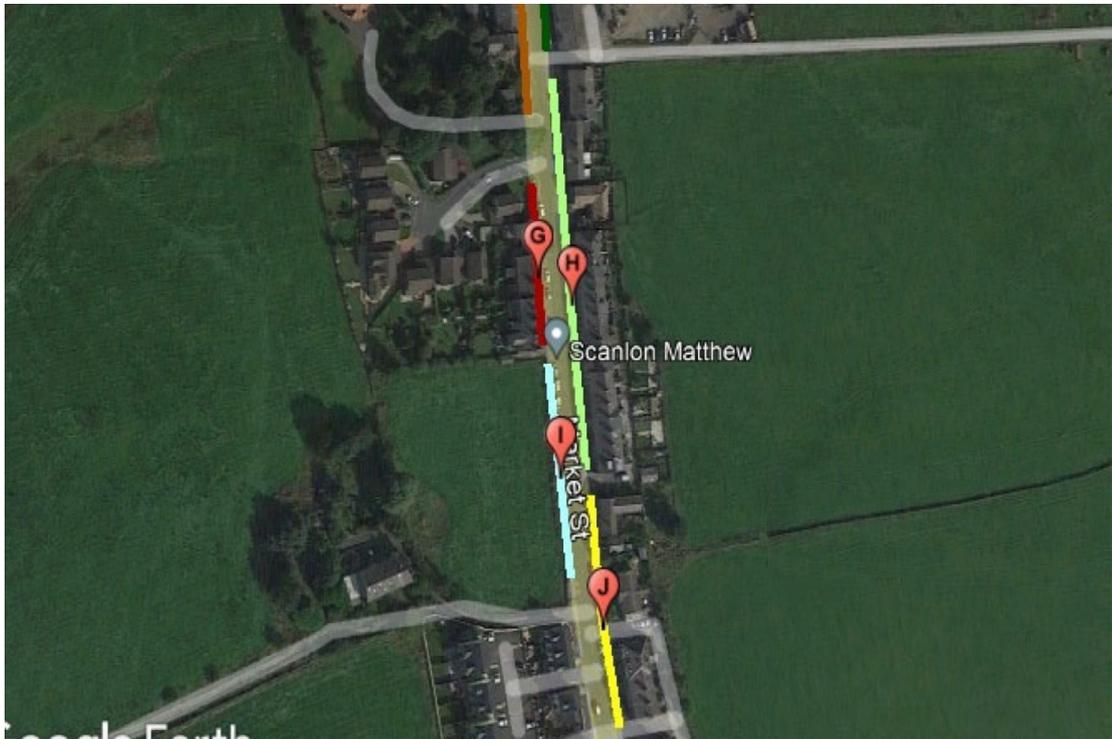
At the time members of ECNF who live locally in the village confirmed that the occupiers of the terraced properties parked on Market Street outside where they live, and as required would also park on the western side of the carriageway, on the opposite side of the road.

The submitted TA attempts to quantify the level of kerbside parking that takes place on this section of adopted highway and the latest parking beat surveys, undertaken between 20<sup>th</sup> and 22<sup>nd</sup> April 2023 confirm the significant volume of on-street parking that takes place on this corridor. As an example, the following on-street residential parking demand (recorded at 0730 hours on Saturday 22<sup>nd</sup> April 2023 was recorded in the following parking beat zones:

- G – 6 vehicles
- H – 20 vehicles

- I – 5 vehicles
- J – 8 vehicles

This equates to a total of 39 parked vehicles parked on-street in the immediate vicinity of the proposed main site entrance on Market Street. Applying a 6m bay space length would mean 234m of kerbside parking would be required in this location to accommodate this parking demand.



**Figure 1:** Extract from Applicant's Parking Beat Survey Data

Drawing 3806-F04 H shows a formalised parking bay on the eastern side of Market Street, from No.102 to 136a. This bay measures circa 86m in length. Further south an additional bay measuring 30m is provided in front of nos. 76 to 82 Market Street. Even with this combined kerbside parking this only equates to parking for circa 19 cars, a shortfall of 20 parking spaces against the existing parking demand on this short section of Market Street.

Whilst it is noted that the applicant is now proposing a 13 space car park for Market Street residents to use, this parking provision does not even meet the shortfall calculated on this limited section of the Market Street corridor.

Based on the above we request that the applicant confirms the following information, so an informed decision can be made on the impacts of the proposed main access to the development, and the impacts on parking for existing residents on this corridor. This review should confirm:

- the existing legal kerbside parking areas along the corridor (by length)
- the current parking demand in each of these parking areas (by vehicle)
- the proposed kerbside parking bay areas along the corridor (by length)
- the net surplus/shortfall in kerbside parking generated by the access proposals and required TROs

Until this information is provided it is not possible for RBC, LCC or ECNF to assess the overall impacts of the displaced parking on the local highway network, or the implications for existing residents on the Market Street corridor.

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, and the provision of formal parking bays along the Market Street corridor

a Traffic Regulation Order (TRO) will need to be introduced. As these works are a prerequisite of the delivery of the access strategy there will need to be a TRO consultation undertaken and progressed outside of the planning application.

This is of course a separate risk for the applicant, and to avoid a situation where the scheme could be granted planning permission, only for the TRO to not be delivered it is recommended that the applicant undertakes the consultation in parallel with the planning application.

The required TRO, relocation of the bus stop, new formalised on-street parking bays and the application of one-way corridor proposals on Exchange Street will all require consultation with the Police, emergency services, local residents, bus companies, and local sustainable access groups. ECNF encourage RBC, LCC and the applicant to undertake this consultation during the life of the planning application, to ensure that the TRO can actually be implemented if the development proposals were to be granted planning permission.

### **The Need for a Comprehensive Corridor Assessment**

ECNF are pleased that the applicant has looked to progress the development of a corridor assessment for Market Street. The proposed access, parking and traffic calming measures on drawing 3806-F04 H move this requirement forward and provide some level of scheme design for both RBC and LCC to consider.

The combination of gateway traffic calming measures, informal crossing points, formalised on-street parking and the ghosted right turn junction are the measures expected to make up the corridor improvement works. As highlighted earlier in this response there is a lack of clarity as to what elements of the corridor strategy will be delivered by each development parcel/phase, or whether all the works will be delivered before first occupations. As required by the RBC Local Plan clarity on these points would be welcomed by ECNF.

Notwithstanding the above there remain concerns over the delivery of the measures shown on drawing 3806-F04 H. As set out earlier the following matters do not appear to have been addressed when preparing the corridor proposals:

- a) that the corridor forms part of the local bus network, and needs to accommodate passing vehicles of this size
- b) Market Street has to accommodate diverted traffic from the A56 if there is ever a road closure on this section of the strategic highway network, and also has to cope with additional traffic when the A56 is busy and modern Sat Nav systems seek it out as an alternative route
- c) Market Street already accommodates a significant level of on-street parking (as confirmed in the applicant's parking surveys) related to the residential properties fronting this corridor and in respect of visitors to local shops and businesses
- d) The proposed ghosted right turn priority junction to the Taylor Wimpey site should be designed to CD123

Commentary on points a) to c) would be welcomed by ECNF, as there are concerns that the volume and on-street parking demands on this corridor have not been fully considered and assessed when preparing the corridor proposals.

In addition there is a lack of detail on the final measures that will be delivered if planning permission is granted. All the proposed measures need to be clearly defined, and in the case of works requiring a TRO consulted on during the life of the application, to ensure all the works and access strategy are deliverable.

Of even greater concern is that the proposed ghosted right hand turn priority junction to serve the Taylor Wimpey development has not been designed to the requirements of CD123. Whilst it is not the responsibility of ECNF to design the access for the applicant, we have previously highlighted the physical width constraints along Market Street, and the challenges delivering a design compliant junction in this location.

For ease of reference we provide an extract of the access proposals below, also with the detailed design requirements on running lane and right turn pocket widths for new accesses on the public highway. In summary CD123 states:

Paragraph 6.8 - *At ghost island junctions on roads other than WS2+1 roads, the through lane widths in each direction shall be a minimum of 3.0 metres and a maximum of 3.65 metres wide, exclusive of hard strips.*

Paragraph 6.10 - *The minimum widths of right turning lanes (excluding those on WS2+1 roads), shall satisfy one of the following:*

- 1) *3.5 metres; or,*
- 2) *3.0 metres for new junctions; or,*
- 3) *2.5 metres for improvements to existing junctions.*

*Note - A narrow right turn lane down to 2.5m wide is only for improvements to existing junctions where space is limited and it is not possible to widen the carriageway cross section, e.g. in urban areas where the carriageway is bounded by buildings.*

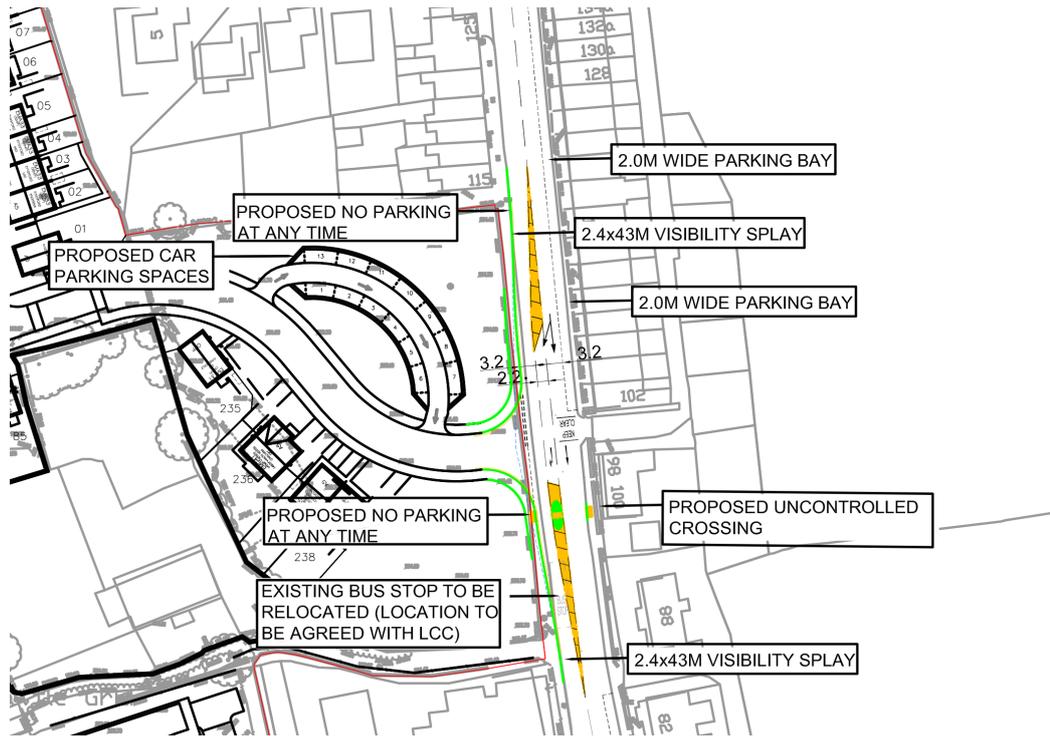
Paragraph 6.10.1 - *The widths of the right turning lanes should be in accordance with 1) for both new and existing junctions.*

Paragraph 6.10.2 - *Where it is not feasible to provide the widths of the right turning lanes fully in accordance with 1), the widths should be as close to 1) as practicable, but no less than 2) or 3) depending on whether the junction is new or existing.*

As shown in **figure 2** below the proposed design does not meet the design requirements set out above for the width of the ghosted right turn lane. Paragraph 6.10 confirms 3m is the minimum width for a new junction, and is required to ensure a motorist can safely wait whilst turning right clear of oncoming traffic and to avoid vehicles blocking southbound ahead movements.

A 2.2m wide right turn pocket does not meet the requirements of CD123. It is 0.8m narrower than the minimum 3m wide pocket for a new junction.

In addition, with the access proposals not delivering a 2m wide footway on the eastern side of Market Street, the design as proposed cannot be considered appropriate to serve a new residential development of any scale.



**Figure 2:** Extract from Applicant's Corridor Improvement Strategy

We believe the reason why the applicant has chosen not to present an access design that complies with CD123 and shows the widened 2m footway on the eastern side of Market Street, the 2m wide parking bay and a 3m wide right turn pocket width is because this cannot be physically accommodated along the site frontage.

This matter was raised during the EiP discussions, in our original submissions to the planning application and are now presented again. It is essential that at some point during the life of the application the applicant confirms whether a CD123 compliant access scheme can be delivered on Market Street.

### The Need for a Road Safety Audit

Based on the significance of the access proposals, and now the presentation of a corridor strategy for Market Street on this strategic route through the village, it seems appropriate that as part of the technical information submitted with the planning application a Stage 1 Road Safety Audit (RSA), along with a Response Report is required for all the access points and corridors where the development proposals will have an impact, or deliver mitigation measures. We would expect an independent RSA team to be appointed by the applicant, and their report to be circulated along with a Response Report. In parallel with this we also expect LCC's Highway Safety Team to also undertake their own independent RSA of the corridor strategy, and their findings to be reported back as part of the planning application review process.

As set out above, with the main development access from Market Street not being compliant with the junction design requirements set out in CD123 it is perhaps not surprising that a RSA has not been submitted with the application.

The combination of the design as presented not showing the widening of the eastern footway, the "Y" distance visibility splay dimensions not being validated, the right turn pocket not meeting the requirements of CD123 or a clear and robust assessment of the level of displaced parking not being presented confirms highway safety matters have not been satisfactorily considered in the submission material prepared to date.

## 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 Taylor Wimpey proposals also place a reliance on an emergency access to the Anwyl land, which then will connect with Exchange Street.

From our review of the additional submission material presented by the applicant there are no GA drawings showing how these access strategies will be delivered, suitability of these access points to serve development traffic or the impacts on any existing on street parking in these locations.

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. As in ECNF's previous submissions it is requested 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 corridor also has the recreation ground adjacent to it, along with the recently constructed bike/skateboard pump track which has a direct pedestrian access onto the Exchange Street carriageway. On the other side of Exchange Street is a children's playground. All these uses generate significant pedestrian movements on this corridor, and by their very nature will attract vulnerable road users, in particular children/cyclists.

Concerns about using Exchange Street as a development access point were 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."*

This matter has also been raised by RBC in their latest response to the applicant.

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.

As expected and highlighted in previous ECNF submissions it is noted that the applicant is now promoting an access strategy which requires the eastern section of Exchange Street to become a one-way street.

This expected access proposal was highlighted at the EiP, RBC, LCC and the site promoters, based on the existing sub-standard visibility at the Exchange Street/Market Street junction, along with the lack of continuous footways and on-street parking in this location.

This requirement now forms part of the corridor strategy for the village and will require a TRO to change the eastern section of Exchange Street from a two-way to one-way trafficked route. The additional material submitted with the planning application is silent on any consultation or detailed review of the implications of this proposal on residents and nearby local businesses.

As set out earlier in this response a full consultation on the required TROs to deliver all the measures contained within the corridor strategy, including the one-way access arrangements on Exchange Street must be undertaken before any decision is made on the planning application.

In addition, and of relevance to this technical point 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 if the one-way access arrangements are not deliverable on the Exchange Street corridor, and whether this would affect the ability to deliver an emergency access between the Taylor Wimpey and Anwyll land.

It has been noted that the applicant's Transport Consultant has stated in their report that there is no junction or capacity assessment to undertake in this location. We dispute this and remind all parties that if a new vehicular access is to be provided in this location it will have a direct impact on traffic flows on Exchange Street, Highfield Road, The Drive, Eden Avenue and Bolton Road North.



**Figure 3:** Example of Existing Residential Parking on Highfield Road

These routes often experience a high level of on-street parking, and coupled with direct pedestrian access from the play area, pump track and recreation ground should be appropriately assessed, and form part of the RSA study area.



**Figure 4:** Bike/Skateboard Pump Track Access Directly on to Exchange Street

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**

As set out in the ECNF January 2023 submission alongside the lack of clarity on the proposed access strategy for the residential allocation via Exchange Street for the Anwyl land, it was highlighted that the TA was silent on the access strategy and potential impacts of the “North of Church Lane” site. The report also remains silent on the proposal for a new car park adjacent to the school, which creates a new access point close to the signalised junction, and may require the removal of existing on street parking, the impact of which should be assessed.

In the original submission the applicant focused heavily on assessing the development impact of the 238 residential units in the TA. It has taken both ECNF, RBC and LCC to remind all parties that the allocation was made “as a whole” to avoid the potential risk of a piecemeal development assessment. Whilst the latest submission documents have moved the assessment forward, there are still matters such as the overall allocation access strategy, the final detailed makeup of the corridor strategy, the separate consultation on the required TROs and other impacts, such as the impacts of any displaced parking on existing highway corridors.

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 and again in their January 2023 representations 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 still 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. As a consequence we highlight to RBC and LCC that GA drawings should be provided of all the proposed access arrangements to the full site allocation, so an appropriate assessment can be undertaken.

### 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.

As set out in our previous submission 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. Whilst it is not intended to provide all the evidence previously presented by the various parties, it is sensible to remind RBC and LCC that during the EiP the Council’s own transport consultants stated in their Highway Capacity Study (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 at this location remains a live issue, and there is very limited scope for any physical improvement works at, and on the approach arms to this junction. As an example Bury Road is subject to significant levels of on-street residential parking, which often reduces the carriageway down to a single lane width. No parking data has been provided for this link, which we consider to be an omission in the technical submission.



**Figure 5:** Looking North on Bury Road – an Example of Existing On-Street Parking Challenges

The applicant's position is that since COVID traffic flows on this corridor have reduced, effectively creating "capacity headroom" on the network to allow the full residential site allocation to come forward. The 2023 traffic flows presented by the applicant are not disputed, but there is the obvious concern that if, over time, traffic flows return to pre-pandemic levels the "capacity headroom" will no longer be available, and the development impacts, in traffic and transport terms, would be expected to be in line with the Mott McDonald assessment considered at the EiP.

ECNF have noted that LCC has already rejected the applicant's approach to use the reduced baseline traffic flow data, to carve out capacity headroom on the network. This is confirmed in the submitted 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.

In this instance there is perhaps the opportunity to prepare a sensitivity test by applying the predicted development traffic flows for the full allocation on the previously presented traffic flows presented by the applicant during the EiP. That way a "worst case" assessment would be presented to allow a clear appraisal to be considered of the development impact if traffic flows on the local highway network were to return to pre-pandemic levels.

## 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 still not been fully submitted for consideration. 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 terms of traffic impact, the scheme appears to be wholly reliant on the "capacity headroom" created on the network post-pandemic to avoid any material impact on the TA study area. It is certainly an "unknown" as to what level traffic flows on the highway network will eventually return to, but a pragmatic approach would be to test the impacts of the development using pre-pandemic baseline flows.

We have highlighted that the proposed access strategy for the allocation as a whole still has not been clearly set out or appropriately assessed. Examples of this include the lack of detailed assessment of the required one-way traffic flow proposal on Exchange Street, the lack of any detailed designs for the northern and southern land parcels, and a lack of clarity on the delivery of the emergency access route through the Anwyl land, and the effects of displaced parking in these locations.

With regard to the proposed vehicular access strategy from Market Street, the previously identified matters where the proposed 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. This latest review has also confirmed that the design is not CD123 compliant, and 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 still required. The review of the Market Street access proposals suggest a CD123 compliant scheme cannot be accommodated along the development site frontage. The applicant needs to confirm to RBC and LCC if this is the case, and we would also expect the corridor proposals to be the subject of a Stage 1 RSA.

Finally, ECNF 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 that were discussed in detail at the EiP. 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. The findings from the 2023 traffic surveys are not disputed, but as highlighted by LCC and recorded by the applicant in the TA whether current traffic flows reflect the long term operational situation of the highway network remains an unknown.

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.

As set out in our January 2023 response 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,



MICHAEL KITCHING

Director