

Edenfield Community Neighbourhood Forum

Rossendale Local Plan Examination Submission

29th August 2019.

Hope View Market Street Edenfield



Edenfield

Rossendale Local Plan Examination

Hearing Statement

Matter 7:

Infrastructure Delivery

Alan G. Ashworth and Richard W. Lester.

Edenfield

Contents:

Matter 7 – Infrastructure Delivery.

Issue – Does the Plan set out a robust framework for infrastructure delivery which is justified, effective and consistent with national policy?

**[Policy SS
Policy SD3]**

Questions, Responses and Comments.

Suggested Revisions.

Alan G. Ashworth and Richard W. Lester: Questions, Responses and Comments

[Policy SS & Policy SD3.]

- 1) **Question a:** Does the Infrastructure Delivery Plan (2018) and the 2019 update (SD014 & SD 015) provide a thorough assessment of infrastructure needs, and reflect levels of growth in the Local Plan?
- 2) **Response:** The two Highway Studies carried out on behalf of RBC have identified significant issues with the Market Place mini roundabout but both failed to undertake any technical appraisal of the traffic impact elsewhere in the village. Their assessments have not considered in any detail the deliverability of the access proposals to the individual land parcels as shown in the Croft technical assessment.
- 3) The technical assessment work has only considered the impact (in traffic and transport terms) of the proposed allocation on a single junction within the village.
No technical appraisal has been undertaken of the traffic impact on highway links or other junctions in the village. The assessments have not considered in any detail the deliverability of the access proposals to the land parcels, as shown in the Croft technical assessment.
- 4) The assessments rely on traffic flow data for a single junction to the south of the village –the technical assessments have not considered peak period or daily traffic flow on Market Street through the village. All the technical assessment work from MM, Croft and SKTP of the only modelled junction (the Rochdale Road/Market Street mini-roundabout junction) confirm in the 2034 assessment this junction will have a material worsening in its performance when compared to the reference case.
- 5) The MM report confirms that at the Rochdale Road/Market Street junction there are limited opportunities to enhance the junction to increase capacity – the report states that the surrounding built up area “may prohibit the development of a scheme within the existing highway boundary”.
- 6) There are material differences between the findings from the MM study, which identifies the need to widen the A56 to three lanes and the HE response which confirms that as an organisation they have no proposals to take this widening scheme forward at this time
- 7) The use of lower development vehicle trip rates by Croft inevitably results in their technical modelling showing a lower level of degradation at the aforementioned junction, but overall effects of this significant level of additional residential development are shown in their technical modelling.
All the technical modelling confirms a fundamental issue with the impact of development traffic at this junction, indicating the scale of development proposed will have an adverse impact’

Access Strategies

- 1) No access appraisal work has been submitted by either the Council or site promoters to demonstrate the development parcels can be safely accessed.
- 2) The SKTP access review has confirmed that the access strategy for the southern development land parcel is severely constrained by both the existing sub-standard visibility at the Exchange Street/Market Street simple priority junction, and also the narrowing of the eastern section of Exchange Street to single way traffic working due to on-street residential parking.
- 3) The Land West of the Market Street development parcel proposes a simple priority junction arrangement onto Market Street – this is in a location where residential parking currently takes place on both sides of the carriageway, and vehicle speeds have been recorded to be in excess of the 30mph speed limit. Additionally, the footway on the eastern side is very narrow at this point.
The two-way traffic flows on Market Street have been recorded as exceeding 8,000 vehicles per day, and an indicative assessment of the expected daily two-way vehicle movements from the development are

predicted to be in excess of 1,000 movements – this flow data indicates that a ghosted right turn priority junction arrangement should be provided to safely access the development site, in line with TD 42/95.

This ghosted right turn junction arrangement cannot be accommodated within the land controlled by the site promoter or the adopted highway, indicating that there is a fundamental issue with the allocation of this site for the scale of development proposed.

- 4) At the northern development site access to achieve the required 2.4m x 43m junction visibility splays land across the adjacent field to the north would have to be brought into the proposed site allocation area.
- 5) **Comments:** These findings demonstrate that the technical work prepared by the Council and site promoters to date has not appropriately assessed the impact of the scale of residential development on the village.
In addition detailed assessments of the proposed access strategies to the various land parcels have not been presented, and from our site visits fundamental issues have been identified that bring into question the delivery of these sites for residential development.
- 6) The importance of undertaking detailed and robust appraisals of all traffic and transport matters as part of the consideration of potential development allocations in the emerging Local Plan should not be underestimated. A failure to appropriately assess the development impact, access strategies and potential mitigation measures at this stage could result in a Planning Inspector finding the Local Plan unsound and an inability by the site promoter to implement their schemes if the Local Plan is adopted.
- 7) From all interested parties perspective it is vitally important that all technical matters relating to development impact, access and mitigation measures are assessed before any Local Plan Examination takes place. Based on the information presented to date the draft residential site allocations have been shown to have an adverse and potentially severe impact on the surrounding highway network. **(See Appendix ECNF – SKT.)**

In view of the lack of an in-depth Highways Study being carried out by RBC we must conclude there has not been an appropriate assessment of the infrastructure needs.

- 8) **Question b:** What is the justification for including site specific infrastructure requirements for some sites proposed for allocation and not for others?
- 9) **Response:** RBC appears to have serious policy limitations when you consider that by far their largest housing site in the Borough is proposed for one of its smallest villages and they have failed to carry out an appropriately assessment of the traffic impact on the village. What other infrastructure issues have they disregarded?
- 10) **Question c:** Is there a reasonable likelihood that the specific infrastructure projects identified in SD015 and SD015 will be delivered when they are required? Particularly:

i : Is the Rawtenstall Gyratory deliverable? Have the concerns of Lancashire Fire and Rescue been addressed? Can the scheme be delivered with the Fire Station remaining in place? If not has a strategy been agreed for its relocation which includes funding and timing? Is there an overall strategy which demonstrates the Rawtenstall Gyratory is deliverable and when it would likely to be delivered? What would be the implications for the Local plan if this scheme was not delivered on time or at all?

Response: RBC to respond to this.

- 11) **Question d:** Is the approach to deliver contributions, as set out in Policy SD3, effective and soundly based? Should it include reference to contributions towards or provision of Suitable Alternative Natural Green Space?

12) **Response:** RBC to respond to this.

Suggested Revisions.

To enable the Local Plan to become sound it will be necessary to remove site H72 from the Housing Site Allocation list, delete Policy HS3, amend the Employment Land requirement and revise the associated policies.

A.G.Ashworth and R.W.Lester.

27.08.19.