Rossendale Civic Trust 17/08/2019 re. MIQs on Infrastructure and Transport. Further comments are set in Purple.

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?

Questions

- a) Does the Infrastructure Delivery Plan (2018) and the 2019 update (SD014 & SD015) provide a thorough assessment of infrastructure needs, and reflect levels of growth in the Local Plan?
- b) What is the justification for including site specific infrastructure requirements for some sites proposed for allocation and not others?
- c) Is there a reasonable likelihood that the specific infrastructure projects identified in SD014 & 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 be likely to be delivered? What would be the implications for the Local Plan if this scheme was not delivered on time or at all?
- d) Is the approach to developer 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?

Matter 18 – Transport

Issue – are policies TR1 – TR4 positively prepared, justified, effective and consistent with national policy?

- a) Does Policy TR2 make appropriate provision for horse riding?
- b) Is Policy TR4 effective and consistent with national policy? Is the requirement for parking provision to incorporate charging points for electric vehicles where the Council considers it appropriate to do so justified? Is this consistent with Policy ENV6? Is it necessary for both policies to require this?
- c) Policy TR4 requires development to meet maximum parking standards set out in Appendix 1 of the Local Plan. Are they underpinned by clear and compelling justification that they are necessary for managing the local road network, or for optimising the density in a location which are well served by public transport as required by paragraph 106 of the National Planning Policy Framework?

Strategic Policy TR1: Strategic Transport

Opportunities to enhance the Borough's external and internal connectivity will be actively supported. Proposals which reduce the need to travel will also be encouraged. Working closely with partners inside and outside the Borough, focus will be on the following:

Improving links to Greater Manchester and the M60/M62 and enhancements to the A56;

Developing the potential of the East Lancashire Railway for both transport and tourism purposes;

Developing the strategic cycle network (Valley of Stone Greenway/National Cycle Route 6) including links between the different routes and to neighbouring authorities;

Addressing congestion hotspots identified in the Highway Capacity Study, specially the gyratory in Rawtenstall;

Promoting sustainable transport solutions to address congestion and air pollution;

Addressing known road safety issues;

Integrating transport more effectively into proposals to improve the public realm where there are opportunities to do so, for example, the area outside Bacup Library and pedestrian links between Rawtenstall Railway Station and town centre; and

Ensuring that development that generates significant movement is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

A site for "Park and Ride" facilities will be protected at Ewood Bridge and is shown on the Policies map.

RCT support TR1 and note that *Traffic congestion in Rossendale is most pronounced around the gyratory in Rawtenstall but is also evident from Crawshawbooth into Rawtenstall, Haslingden Tesco roundabout, in Waterfoot and Stacksteads. A new bus station is currently being built in Rawtenstall as part of the Spinning Point development and the Council will explore other opportunities to improve bus services.* However RCT sees a need to remind us all of the roles in Rossendale of GOV UK:-

A. Rossendale in Lancashire's Roads.

While there is now only a heritage railway, some parts of Rossendale are well served by roads. More were to be, but as you can see from this 1965 LCC Major Road Proposals Plan, the M65 is not there, nor the use of the Haslingden Bye-pass as an A56T diversion instead of the Crawshawbooth Bye-pass.

This left Rawtenstall with just the dual carriageway of St Mary's Way, meeting, at "Tup Bridge", the single carriageway Burnley Road. There are many local memories of its original Queens Square Bus Station on the site of what's now the Fire Station.

And there's an abandoned section of Pedestrian Underpass, intended for a new Queens Square Bus Station; but this was, RCT believe, prevented by? GOVUK's DOE or MoT, the highway authority, or the North West Roads Construction Unit who were responsible for the design and construction of these roads?

B. The A56T Diversion from Rawtenstall to Haslingden.

RCT see that the 1970s abandonment of the Crawshawbooth Bye-pass, with up to 4 alternate routes, has moved the focus for new development towards the M66/A56T Corridor. What's now classed as Rossendale West: Edenfield, Helmshore, Haslingden, Acre, and Rising Bridge, has since the 1980s seen the construction of new housing estates, business parks, and retail outlets.

Compare Haslingden Sykeside Tesco's Business Rates of £210/sqm with Rawtenstall Bocholt Way Tesco's £180/sqm, the X41 Transdev commercial bus service from Blackburn to Manchester via Rising Bridge, Acre, Haslingden and Helmshore with no reason to detour to a Rawtenstall Bus Station. Rawtenstall is reached by the 464 Rosso from Accrington to Rochdale. But as for "sustainable transport modes" in terms of NPPF 2012, **RCT note the long walks between bus stops in Haslingden for these services – Not quite Super Stops? Not part of a "Hub and Spoke" bus route pattern. How sustainable to need to look at car park charges to help with running costs of Rawtenstall Bus Station – no grant "free money".**

C. RCT note these proofs of how Rossendale's roads were "sorted" with no local say:

Hansard 29 March 1972

Mr Michael Heseltine. Alternative routes for the northern end of the Edenfield-Rawtenstall by-pass to the Calder Valley fast route, details of which were announced by my hon. Friend the Minister of Local 2 of 7. 21/08/2019.

Government on 17 March, are currently being investigated. In the meanwhile work on detailed plans for the Crawshaw-booth bypass had been suspended. However minor improvements to the A56 are being considered.

Haslingden Bye-pass Public Enquiry Inspector Philip M Vine 17 June 1976:

75. Bearing in mind the above facts, I reach the following conclusions:-

1 With regard to the Department's intention that the Haslingden Bye-pass shall form the outhern section of a diversion from Bent Gate to Huncoat of the existing A56 from Rawtenstall to Burnley, I am unable to reach the conclusion that such diversion is preferable to an improvement on the line, or approximate line, of the existing A56. Although the diversion of the A56 as proposed by the Department may well be the preferred solution to the undoubted inadequacy of the existing A56, insufficient evidence was tendered by the Department to justify such a conclusion.

No evidence, or insufficient evidence was given as to:-

- a) comparative costs of construction,
- b) comparative costs of land acquisition,
- c) comparative quantified travel benefits or disbenefits,
- d) comparative numbers of properties affected,
- e) comparative environmental impact,
- f) comparative predicted traffic flows.

15 November 2018 email DfT: RCT's objection is not withdrawn, and there's now the Highway Capacity Study's input, and trust our comments, listed as C1 to C9, show additional facts that we see as relevant, as you advise: *directly to the highways matters, which are the subject of the proposed stopping up Order/development proposals*,

C5. Rossendale Local Plan's preparation process included this interim report in August 2018.

ROSSENDALE INFRASTRUCTURE DELIVERY PLAN

Pages 15 and 16, there are 2 proposals to reconstruct the Rawtenstall Gyratory, with plans which omit to show the present Fire Station, they explain:-

The key junction in Rossendale is the Gyratory roundabout in Rawtenstall as much of the traffic from the east of the Borough and parts of the north flow through it and it is a key point in east-west trips. The two preferred options are shown below:



Gyratory-Do-Minimum

The Gyratory is expected to be able to function acceptably in the first five years of the Plan but beyond that intervention would be required if Local Plan development proposals are to progress. Addressing the issue of the Gyratory is therefore essential for years 5-15 of the Local Plan Housing

Trajectory. Anything other than a "do minimum" option is likely to be a major scheme bid of in excess of £10 million including the cost of relocating the Fire Station. There are a number of potential funding options including incorporation within LTP4 though it is recognised there are a number of other schemes across Lancashire seeking funding. A multi-agency bid into other funding pots is also possible. Possible options are identified in Appendix 2.



C6. 5 October 2018 deadline for comments on Local Plan. RCT submitted theirs on 4 October, and amongst them we included:-

RCT note, more capacity in West and even East Rossendale, and maybe a need to consider their locations as more suitable for traffic generating growth than those that need an expensive relocation of the Fire Station for a rebuilding of the Rawtenstall Gyratory.

C7. RCT then saw the "final" issue of this capacity study was 1 October 2018. And now, how the vehicles per hour traffic volumes add up for Bacup Road and Bocholt Way.



C8. These predict a big increase for 2019. RBC Forward Planners gave April 2011 flows of c400vph West to East and c200vph East to West on C709 Bacup Road: section from A682 St Marys Way to A681 Bocholt Way. Have spoken with LCC's traffic stats person, who advised that they were a manual count on one day, and also that a higher figure was recorded In October 2015:-

7 weekdays average, 8.00 – 9.00am weekday peak: 600vph East and 200vph West. 4 of 7. 21/08/2019.

Now Mott MacDonald's Rossendale Local Plan Highway Capacity Study 01 Oct 2018, gives predicted peaks flows c800vph E and 200 vph W for the C709 Bacup Road. It explains:-

The 2019 assessment year represents the start year for the Rossendale Local Plan, and as such the baseline from which all other assessment years can be compared. The key aspect of the baseline analysis is to ensure representation of the existing delay issues at each junction. The 2019 input traffic flows were derived by applying the calculated TEMPRO* value for 2017-2019 to the surveyed flows. "Trip End Model Presentation Program)

And then there's its plans to remodel the Gyratory for more traffic to use Bocholt Way, and can't see any reasons that it might just be to do with Bus Station's traffic lights. Or is the focus in this Highway Capacity Study on a local desire for not too much more housing. Question then is, has all the new housing in Rossendale East caused the extra flows in order to get to M66?

And for 2019, we now see predicted flows for Bacup Road, where it's joined by Bocholt Way to become A681, AM 1061vph E, 852vph W. PM 1182vpm E. 969vph W.

Note past guidance from your Department: Traffic capacity, TA 79/99 AMENDMENT NO 1, 60:40 directional split 2 lane UAP4 7.4m urban road's busiest direction flow 1140 less 150 for 15-20% heavy vehicle content gives 990 vph.

Does this suggest that whatever is done to the Rawtenstall Gyratory, they will only speed up traffic flows to the next restriction. At present for traffic to Rossendale East and Yorkshire, it's the Mini-roundabout junction of Bacup Road and Bocholt Way. And what's next?

More use of Bocholt Way could require a signal controlled junction for Tesco, soon to become a discount Jacks.



More of this "tail-back" congestion, as Bacup Road is stopped both ways, at Lord Street's signal controlled junction, for, as well as the swept paths of buses, also for Royal Mail, Mansergh, and the rest of us who have no reason to head up Kay Street to join Bank Street's Asda lights queue.

RCT also note Department for Transport's past involvements in Rossendale



5 of 7. 21/08/2019.

C9. Rossendale Civic Trust 12 November 2018 Executive Committee: 10 were present. After a long discussion on stopping up proposals RCT's objection is not withdrawn.

We now have a situation where the Royal Mail have forced RBC to retain an all vehicle route from Kay Street to Bacup Road. It's taken over 2 years. However it still leaves an intention to build a Bus Station, with only one way out from Lord Street into Bacup Road. It's restricted area means traffic lights close Bacup Road both ways to provide enough space for a bus to turn. And if there were problems with the old buildings to each side or services under Lord Street, there's no Plan B way out for buses. This objection basis has already been put to Department of Transport in 2016 and restated with comments on air quality in 2017. In this response for 2018, have tried to use the Local Plan Highway Capacity Study as new material to support, maybe even add, more weight to our objection.

Rawtenstall's Highways, as can be seen from this plan, have the legacy of Bocholt Way added after the design and construction of the Level Crossing Bye-pass, with a connection to the Gyratory which is not suited to traffic wishing to use the remaining A681 route to Waterfoot, Stacksteads, Bacup, Whitworth and West Yorkshire. A legacy surely of the Department for Transport.



2018 - 2019 National Infrastructure Commission

Transport Connectivity Final Report Version: 3.4 Date: 25/06/2018. In fact, the first area of the country to appear on the league table that is not a city is the area of Accrington and Rossendale – appearing at number 26. All other spots above that are filled by cities.

E34004905 Accrington/Rossendale Built Up Area Population 2016 123,754. Employment 39,545. Pop 2011 122,085. Emp 2011 43,243.

FOI to NIC: NOTE Census 2011: population Hyndburn and Rossendale: 148,682. Adding Whitworth to Rochdale only reduces by 7,500. So some parts of Hyndburn also not included???

NIC 15 February 2019 response:

A. The full dataset used to create the league table will be published early next week on our Website. This will be alongside a discussion paper which explains the metrics in more detail and the initial findings from the data.

B. The Commission did not make the specific decision to treat Rossendale and Accrington as a single Built up Area. This grouping was a result of the Office for National Statistic's methodology applied when they created this geography. ONS' built up areas were used by Prospective Labs when they developed the connectivity values for the Commission. The full dataset to be published by the Commission next week is therefore at the built up area level, as defined by ONS. (The Office of National Statistics)

TRANSPORT CONNECTIVITY Discussion paper. February 2019

Table 5: 15 most congested places according to the NIC congestion metric compared to the 15 local authorities with the longest average delay on 'A' roads, 2016 (includes England only, excluding London)

1 Greater Manchester - Slough UA	Table 5 compares the 15 most
2 Liverpool - Reading UA	congested built up areas according to the calculated congestion metric

6 of 7. 21/08/2019.

3 West Midlands -	Bristol, City of UA
4 South Hampshire -	Manchester (Greater Manchester)
5 Nottingham -	Tameside (Greater Manchester)
6 West Yorkshire -	Brighton and Hove UA
7 Bristol -	Liverpool
8 Brighton and Hove -	Kingston upon Hull, City of UA
9 Leicester -	Southampton UA (South Hampshire)
10 Bournemouth/Poole	-Leicester UA
11 Southend-on-Sea -	Wolverhampton (West Midlands)
12 Tyneside -	Birmingham (West Midlands)
13 Sheffield -	Nottingham UA
14 Kingston upon Hull - Portsmouth UA (South Hampshire)	
15 Sunderland -	Salford (Greater Manchester)
Note table does not reach Accrington and Rossendale at 26, to see scores for ambitious UAs such as Preston, Blackburn and Warrington .	

MSEdge, in TfN's Plan finds: road 332, rail 510, tram/light rail 4/5, bus 36, motorway 5/6, airport 137. Is this a rough indication of where "leaders" want to spend?

with the Department for Transport's average delay on locally managed 'A' roads by local authority in 2016. The average delay data is available at the local authority level so the full dataset cannot be directly matched to built up areas. London has been excluded from both rankings as the delay data is broken down to the borough level, which would make almost all of the 15 most congested places in Greater London. The table highlights that there are similarities between the areas which are found to suffer the worst delays on 'A' roads and are the most congested, with 13 out of the 15 local authorities with the worst average delay located within the top 14 most congested built up areas. Reading and Slough are the clear outliers in the table, which reflects the different approaches used to calculate the two metrics. Although, both Reading and Slough also rank within the top 50 most congested built up areas.



July 2019 HS2B Consultation. Where's Rossendale in this competition for investment?

1.25 The Secretary of State has decided to consult on the provision of two touchpoints for NPR within this consultation. These will facilitate future junctions that could connect to a potential new line from HS2 towards Liverpool. One junction would allow future Liverpool-Manchester NPR trains to use the HS2 line into Manchester; the other would allow future London-Liverpool HS2 trains to use any new, future NPR route into Liverpool. This would enable improved capacity and connectivity between Liverpool, Warrington and Manchester Piccadilly whilst significantly reducing journey times between Liverpool and Manchester Airport, and a faster route between Liverpool, Warrington and London.