

Local Plan – Regulation 24
Second Tranche Consultation on Examination Library 8
Responses Received
Part 3 of 3 – Responses 184 to 210



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Table Showing Actions, Policies & Allocations Addressed in Responses

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Comment Reference	Page Number	Name	Status	Action Reference	Site Allocation or Policy Reference	Objection / Support
T2 - 1	10	Gail Kershaw	Resident	9.2	H7	Objection
T2 - 2	11	Colin Hill	Statutory Consultee	4.1	Tooters Quarry	N/A
T2 - 3	12	Highways England	Landowner / Developer / Planning Agent	15.6	NE1	N/A
T2 - 4	13	Equality and Human Rights Commission	Statutory Consultee	N/A	N/A	N/A
T2 - 5	14	Sharon Simcock	Resident	6.1	N/A	N/A
T2 - 6	17	CM McDermott	Resident	13.2	H69	Objection
T2 - 7	19	John Newcombe	Statutory Consultee	16.2	ENV6	N/A
T2 - 8	22	Anthony Greenwood	Landowner / Developer / Planning Agent	8.9	NE4	N/A
T2 - 9	23	L & M Wilson	Resident	19.5	H39	Objection
T2 - 10	24	Caroline Holt	Resident	15.9	NE4	Objection
T2 - 11	28	Natural England	Statutory Consultee	N/A	N/A	N/A
T2 - 12	29	Tom Winstanley	Resident	10.7	H39	Objection
T2 - 13	30	Jeremy Dodd & Celia Thomas	Resident	10.7	H39	Objection
T2 - 14	31	Shelia & Matt Goodwin	Resident	10.7	H39	Objection
T2 - 15	33	Jade	Resident	10.7	H39	Objection
T2 - 16	34	Chantelle Jeziorski	Resident	10.7	H39	Objection
T2 - 17	35	Roman Jeziorski	Resident	10.7	H39	Objection
T2 - 18	36	Nicholas Cousins	Resident	10.7	H39	Objection
T2 - 19	39	Alan Heyworth	Resident	10.7	H39	Objection
T2 - 20	41	Yvonne Peach	Resident	10.7	H39	Objection
T2 - 21	42	Peter & Kay Livesey	Resident	10.7	H39	Objection
T2 - 22	43	J Egan	Resident	10	N/A	Objection
T2 - 23	44	Kris Archer	Resident	10.7	H39	Objection

T2 - 24	45	Rachel Coaker	Landowner / Developer / Planning Agent	N/A	N/A	N/A
T2 - 25	46	Sharon Simcock	Resident	12.1	H59	Objection
T2 - 26	47	Dr Falmai Binns	Resident	16.2	ENV6	N/A
T2 - 27	48	Peter Martin	Resident	10.7	H39	Objection
T2 - 28	49	Lynn Cavanagh	Resident	10.7	H39	Objection
T2 - 29	50	Shareene Wright	Resident	10.7	H39	Objection
T2 - 30	51	Carlo Latronico	Resident	9.1	H5	Objection
T2 - 31	52	Sandra Navesey	Resident	10.7	H39	Objection
T2 - 32	53	Peter Riley	Resident	10.7	H39	Objection
T2 - 33	54	Edna Crowther	Resident	10.7	H39	Objection
T2 - 34	55	Hourigan Connolly (Mr Teague & Mr Skillin)	Landowner / Developer / Planning Agent	8.1 and 8.7 / 8.12	SHLAA16268 - Land at Elm Street	Objection
T2 - 35	71	Homes England	Statutory Consultee	N/A	N/A	N/A
T2 - 36	72	Hourigan Connolly	Landowner / Developer / Planning Agent	10.8	H40	Support
T2 - 37	73	David Graham	Resident	9.1	H5	Objection
T2 - 38	75	Dorothy Graham	Resident	9.1	H5	Objection
T2 - 39	76	John Atherton & Lynne Lomax	Resident	10.8	H40	Objection
T2 - 40	105	Grane Residents' Association	Statutory Consultee	16.1	H47, ENV5	Objection
T2 - 41	126	Marie-Louise Charlton	Resident	16.1	H47, ENV5	Objection
T2 - 42	130	Paul & Alison Nixon	Resident	10.7	H39	Objection
T2 - 43	131	Trevor Pritchard	Resident	10.7	H39	Objection
T2 - 44	132	CR & E McGinley	Resident	10.7	H39	Objection
T2 - 45	133	Suzanne Haworth & Chris Firth	Resident	15.9	NE4	Objection
T2 - 46	136	Sarah & Andrew Hardman	Resident	9.1	H5	Objection
T2 - 47	142	Charles Ault & Beverley Hartley	Resident	10.7	H39	Objection
T2 - 48	145	Elizabeth Tighe	Resident	10.7	H39	Objection
T2 - 49	146	Sport England	Statutory Consultee	4.3	N/A	N/A
T2 - 50	146	Sport England	Statutory Consultee	11.3	H52	Support

T2 - 51	146	Sport England	Statutory Consultee	17.1	N/A	Support
T2 - 52	148	D Burns	Resident	9.1	H5	Objection
T2 - 53	149	Emma Lawson	Resident	10.7	H39	Objection
T2 - 54	150	Lindsay Jayne Humphreys	Resident	10.7	H39	Objection
T2 - 55	152	Valerie Balshaw	Resident	10.7	H39	Objection
T2 - 56	153	Natasha Uttley	Resident	9.1	H5	Objection
T2 - 57	154	Sally Dewhurst	Resident	9.1	H5	Objection
T2 - 58	157	Ian Boucher	Resident	9.1	H5	Objection
T2 - 59	158	Barrie Clinch	Resident	10.7	H39	Objection
T2 - 60	160	Tracey McMahon	Resident	9.1	H5	Objection
T2 - 61	162	Matthew Ramsden	Resident	9.1	H5	Objection
T2 - 62	164	Mr & Mrs G Oates	Resident	9.1	H5	Objection
T2 - 63	165	Barbara Rose	Resident	9.1	H5	Objection
T2 - 64	166	Deborah Brown & Andrew Morris	Resident	9.1	H5	Objection
T2 - 65	167	Beverley Cook	Resident	15.9	NE4	Objection
T2 - 66	169	Christine Smithies	Resident	9.1	H5	Objection
T2 - 67	170	Patricia Simcock	Resident	10.7	H39	Objection
T2 - 68	171	Lindsay Rose	Resident	9.1	H5	Objection
T2 - 69	172	Dean Rose	Resident	9.1	H5	Objection
T2 - 70	173	Elizabeth & John Finn	Resident	9.1	H5	Objection
T2 - 71	175	Chris Higginbotham	Resident	15.9	NE4	Objection
T2 - 72	176	Rajender Singh	Resident	10.7	H39	Objection
T2 - 73	177	Chris Allen	Resident	10.7	H39	Objection
T2 - 74	178	Sally Turner	Resident	9.1	H5	Objection
T2 - 75	184	Chris Turner	Resident	9.1	H5	Objection
T2 - 76	190	Jason Norris	Resident	9.1	H5	Objection
T2 - 77	204	K Abbott	Resident	9.1	H5	Objection
T2 - 78	218	George & Jaimie Weir	Resident	9.1	H5	Objection
T2 - 79	220	Wesley Mort	Resident	9.1	H5	Objection

T2 - 80	221	Sonia Lofthouse	Resident	9.1	H5	Objection
T2 - 81	227	Jonathan Lofthouse	Resident	9.1	H5	Objection
T2 - 82	233	Nina Mort	Resident	9.1	H5	Objection
T2 - 83	234	Jason & Sarah Menzies	Resident	9.1	H5	Objection
T2 - 84	236	Jack Norris	Resident	9.1	H5	Objection
T2 - 85	242	Dorothy Norris	Resident	9.1	H5	Objection
T2 - 86	248	Robert Belshaw	Resident	10.7	H39	Objection
T2 - 87	249	Michael Abbott	Resident	9.1	H5	Objection
T2 - 88	254	Christine Abbott	Resident	9.1	H5	Objection
T2 - 89	259	Jean Howarth	Resident	4.1	Tooters Quarry	Objection
T2 - 90	260	Chris Howarth	Resident	4.1	Tooters Quarry	Objection
T2 - 91	261	Jake Nixon	Resident	10.7	H39	Objection
T2 - 92	262	Steve Holt	Resident	15.9	NE4	Objection
T2 - 93	264	Hive Land & Planning (Anwyl Land)	Landowner / Developer / Planning Agent	2.2, 14.3	H72	
T2 - 94	402	James Cooper	Resident	10.7	H39	Objection
T2 - 95	403	Cllr Margaret Pendlebury	Statutory Consultee	N/A	H74	Objection
T2 - 96	404	Lancashire Badger Group	Statutory Consultee	N/A	N/A	N/A
T2 - 97	415	Emma Anforth	Resident	7.2	N/A	Objection
T2 - 98	417	Anne Makin	Resident	10.7	H39	Objection
T2 - 99	418	David & Janice Walkden	Resident	10.7	H39	Objection
T2 - 100	419	Freda Camps	Resident	10.7	H39	Objection
T2 - 101	420	Harold Lord	Resident	10.7	H39	Objection
T2 - 102	421	Ian & Patricia Jacqueline Boswell	Resident	10.7	H39	Objection
T2 - 103	424	James A Attwood	Resident	10.7	H39	Objection
T2 - 104	427	Janette Cassidy & Gary Slynn	Resident	10.7	H39	Objection
T2 - 105	428	S Cook	Resident	10.7	H39	Objection
T2 - 106	430	Robert & Lorraine Benson	Resident	11.3	H52	Objection
T2 - 107	431	Rachel O'Leary & Mark Chapleo	Resident	4.1	Tooters Quarry	Objection

T2 - 108	432	Historic England	Statutory Consultee	10.8	H40	N/A
T2 - 109	432	Historic England	Statutory Consultee	14.3	H72	N/A
T2 - 110	432	Historic England	Statutory Consultee	15.8	NE3	N/A
T2 - 111	432	Historic England	Statutory Consultee	15.3	M1	N/A
T2 - 112	432	Historic England	Statutory Consultee	9.1	H5	N/A
T2 - 113	432	Historic England	Statutory Consultee	14.4a	H73	N/A
T2 - 114	432	Historic England	Statutory Consultee	20.1	N/A	N/A
T2 - 115	432	Historic England	Statutory Consultee	20.2	N/A	N/A
T2 - 116	436	Darren Hall	Resident	16.1	H74	Objection
T2 - 117	438	Danielle Dunn	Resident	9.1	H5	Objection
T2 - 118	439	Emma Bird	Resident	16.1	H74	Objection
T2 - 119	442	Peter Jacques	Resident	10.7	H39	Objection
T2 - 120	443	J Nicholass	Resident	N/A	H74	Objection
T2 - 121	444	Kirsten Black	Resident	16.1	H74	Objection
T2 - 122	447	Carol Black	Resident	16.1	H74	Objection
T2 - 123	450	Steve Black	Resident	16.1	H74	Objection
T2 - 124	453	Paula Maxwell	Resident	16.1	H74	Objection
T2 - 125	456	Victoria Maltby	Resident	N/A	H74	Objection
T2 - 126	458	Sam McManus	Resident	16.1	H74	Objection
T2 - 127	461	Angela Hardaker	Resident	N/A	H74	Objection
T2 - 128	462	Lisa Postins	Resident	N/A	H74	Objection
T2 - 129	463	Manchester Airport	Statutory Consultee	N/A	N/A	N/A
T2 - 130	464	Caroline Rigby	Resident	16.1	H74	Objection
T2 - 131	467	Bryan Bancroft	Resident	10.7	H39	Objection
T2 - 132	468	Mark Benson-Brown	Resident	4.1	Tooters Quarry	Objection
T2 - 133	469	Anthony Hodbod	Resident	8.2	H74	Objection
T2 - 134	473	Stephen Newton	Resident	9	H4, H5, H13	Objection
T2 - 135	475	Anna Duxbury	Resident	8.1	SHLAA16268	N/A
T2 - 136	476	Mr & Mrs J Horsfall	Resident	8.1	SHLAA16268	N/A

T2 - 137	480	Paul Williams	Resident	8.1	SHLAA16268	N/A
T2 - 138	484	Ian Francis	Resident	20.2	H39	N/A
T2 - 139	486	Shelia Goodwin	Resident	20.2	H39	N/A
T2 - 140	487	Charles Ault & Beverley Hartley	Resident	20.2	H39	N/A
T2 - 141	488	Celia Thomas & Jeremy Dodd	Resident	20.2	H39	N/A
T2 - 142	489	Allan Boon	Resident	20.2	N/A	Objection
T2 - 143	490	Andrew Kyme	Resident	15.9	NE4	Objection
T2 - 144	493	Nicholas Cousins	Resident	20.2	H39	N/A
T2 - 145	495	Janet Boon	Resident	10.6, 10.7, 10.9	H29, H39, H41	Objection
T2 - 146	496	Shelia Newton	Resident	9.1	H5	Objection
T2 - 147	499	Grane Residents' Association	Statutory Consultee	4.3, 8.2, 8.7, 8.8	H74	Objection
T2 - 148	502	Hourigan Connolly (B&E Boys)	Landowner / Developer / Planning Agent	N/A	H32	N/A
T2 - 149	507	Debby Macy	Resident	9.1	H5	Objection
T2 - 150	512	Sarah Goggins	Resident	10.7	H39	Objection
T2 - 151	513	Joanne Starbuck Ashton & Francois Kinowski	Resident	10.7, 20.2	H39	Objection
T2 - 152	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	1.4	N/A	Support
T2 - 153	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	2.2	N/A	Support
T2 - 154	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	4.3	N/A	N/A
T2 - 155	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	6.1	H72	Support
T2 - 156	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	14.1-14.4	H72	Support
T2 - 157	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	17.1	N/A	N/A
T2 - 158	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	19.4	Clod Lane site	

T2 - 159	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	20.1	N/A	Support
T2 - 160	514	Pegasus Group (Taylor Wimpey Ltd)	Landowner / Developer / Planning Agent	20.2	H72, H74	Objection
T2 - 161	585	Gillian Fielding	Resident	15.9	NE4	Objection
T2 - 162	586	Gavin Pilling	Resident	10	N/A	Objection
T2 - 163	587	Marie-Louise Charlton	Resident	N/A	H74	Objection
T2 - 164	591	Pete Ackerley	Resident	10.7	H39	Objection
T2 - 165	593	LCC School Planning Team	Statutory Consultee	1.3	N/A	N/A
T2 - 166	593	LCC School Planning Team	Statutory Consultee	20.2	N/A	N/A
T2 - 167	596	Campaign to Protect Rural England	Statutory Consultee	1.4	N/A	Support
T2 - 168	596	Campaign to Protect Rural England	Statutory Consultee	2.2	N/A	Support
T2 - 169	596	Campaign to Protect Rural England	Statutory Consultee	3	N/A	Objection
T2 - 170	596	Campaign to Protect Rural England	Statutory Consultee	8	N/A	N/A
T2 - 171	596	Campaign to Protect Rural England	Statutory Consultee	9	N/A	N/A
T2 - 172	596	Campaign to Protect Rural England	Statutory Consultee	16	N/A	N/A
T2 - 173	601	Ms Barker	Resident	N/A	N/A	Support
T2 - 174	602	CBRE (United Utilities)	Landowner / Developer / Planning Agent	10.1	H28	Support
T2 - 175	602	CBRE (United Utilities)	Landowner / Developer / Planning Agent	13.2	H69	Support
T2 - 176	609	Rob Wells	Resident	N/A	N/A	N/A
T2 - 177	610	Hollins Strategic Land	Landowner / Developer / Planning Agent	N/A	H13	
T2 - 178	631	Ian Francis	Resident	10.7	H39	Objection
T2 - 179	655	Bacup & Stacksteads Neighbourhood Forum	Statutory Consultee	N/A	N/A	N/A
T2 - 180	656	Hazel Ball	Resident	15.7, 15.8	NE2, NE3	Objection
T2 - 181	657	Phill Rawlins	Resident	N/A	N/A	N/A
T2 - 182	658	Cllr Sue Brennan	Statutory Consultee	4.1, 14	N/A	Objection
T2 - 183	659	Planware Ltd (McDonald's Restaurants Ltd)	Landowner / Developer / Planning Agent	N/A	R5	Objection

T2 - 184	689	Edenfield Community Neighbourhood Forum	Statutory Consultee	4.3	N/A	Objection
T2 - 185	696	Edenfield Community Neighbourhood Forum	Statutory Consultee	5.2	N/A	Objection
T2 - 186	705	Edenfield Community Neighbourhood Forum	Statutory Consultee	6.1	N/A	
T2 - 187	712	Edenfield Community Neighbourhood Forum	Statutory Consultee	7.2	N/A	Objection
T2 - 188	714	Edenfield Community Neighbourhood Forum	Statutory Consultee	14.1-14.4	H70	Support
T2 - 189	714	Edenfield Community Neighbourhood Forum	Statutory Consultee	14.1-14.4	H71	Objection
T2 - 190	714	Edenfield Community Neighbourhood Forum	Statutory Consultee	14.1-14.4	H72	Objection
T2 - 191	714	Edenfield Community Neighbourhood Forum	Statutory Consultee	14.1-14.4	H73	Support
T2 - 192	733	SK Transport Planning (Edenfield Community Neighbourhood Forum)	Landowner / Developer / Planning Agent	14.3	H72	Objection
T2 - 193	818	Edenfield Community Neighbourhood Forum	Statutory Consultee	15.1, 15.2, 15.6-15.10	NE1, NE2, NE3, NE4, NE5	Objection
T2 - 194	823	Edenfield Community Neighbourhood Forum	Statutory Consultee	15.1, 15.3-15.5	M1, M2, M3	Objection
T2 - 195	826	Edenfield Community Neighbourhood Forum	Statutory Consultee	15.1 Appendix E	NE1, NE2, NE5	Objection
T2 - 196	831	Edenfield Community Neighbourhood Forum	Statutory Consultee	19.4	Clod Lane site	Support
T2 - 197	834	Edenfield Community Neighbourhood Forum	Statutory Consultee	19.8	N/A	
T2 - 198	842	Edenfield Community Neighbourhood Forum	Statutory Consultee	20.1	N/A	Objection
T2 - 199	850	Edenfield Community Neighbourhood Forum	Statutory Consultee	EL6.016	N/A	Objection
T2 - 200	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	N/A	N/A	N/A
T2 - 201	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	2.2	N/A	Support
T2 - 202	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	4.3	H47, H72	Support
T2 - 203	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	5.2	N/A	
T2 - 204	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	11.1-11.3	H47	
T2 - 205	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	14.1-14.4	H72	Support

T2 - 206	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	19.4	Clod Lane site	Objection
T2 - 207	855	Turley (Peel L&P)	Landowner / Developer / Planning Agent	20.2	N/A	
T2 - 208	884	K Abbott	Resident	N/A	N/A	Objection
T2 - 209	885	Lancashire Fire & Rescue Service	Statutory Consultee	7.2	N/A	Objection
T2 - 210	897	Hourigan Connolly (B&E Boys)	Landowner / Developer / Planning Agent	11.3	H52	N/A
T2 - 211	898	Mr Dickinson (LATE)	Resident	10	H43, H44, H45	Objection
T2 - 212	900	Arlene Harris (LATE)	Resident	N/A	H74	Objection

Examination of the Rossendale Local Plan

Action 4.3 - Open Space Assessment Report

Representations by A. G. Ashworth and R. W. Lester about KKP's Report dated January 2021 and RBC's Undated Response

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Key Points

- Curious page numbering hinders citation Paragraph 1.1.1
- Report methodology unclear Paragraphs 1.1.4, 1.2.6 and 1.3.4
- Untrue statement that typologies are as in Companion Guidance to PPG17 Paras 1.1.5 to 1.1.8
- Lack of clarity of expression Paragraphs 1.2.3 and 1.2.10
- Inappropriate, offensive equivalence of "Pet crematorium" with cemetery/churchyard Para 1.2.5
- At least ten burial grounds omitted. Paragraph 1.2.8
- At least one park or garden, and at least one allotment site, omitted. Paragraphs 1.5.3 & 1.6.2
- Supposed audit fails to confirm or deny existence of named allotment site Paras 1.5.1 & 1.5.2
- Site maps withheld; small scale maps & lack of addresses make data difficult to verify Para 1.1.3
- Natural and semi-natural greenspace probably under-stated Paragraph 1.3.1
- Confused treatment of boundary sites Paragraphs 1.3.2 and 1.3.3
- Difficult to understand large open country NSN Greenspaces being inaccessible Para 1.3.4
- Basic errors in how sites H72 and H73 are observed Paragraphs 1.8.1 to 1.8.4
- Various other inaccuracies impugn value and reliability of whole report Paras 1.1.9 and 1.3.4
- Purported survey results (Appendix 1) of doubtful value Paragraphs 1.7.1 to 1.7.9
- Report is unfit for purpose. RBC must share responsibility Paragraph 2.1

Examination of the Rossendale Local Plan

Action 4.3 - Open Space Assessment Report

Representations by A. G. Ashworth and R. W. Lester about KKP's Report dated January 2021 and RBC's Undated Response

Representations

I. KKP's report

I.1 General

I.1.1 The curious page numbering makes the report hard to navigate and cite.

I.1.2 KKP's Table 1.1 lists open space typology examples with primary purpose and description, or 'definitions' as the caption says.

I.1.3 The small scale of the Figures that map the open spaces and the lack of addresses in the Tables that list them make the data in the report difficult to verify (Parts 4 to 10). KKP's paragraph 2.2 states that

"Sites are primarily identified by . . . official site names, where possible, and/or secondly using road names and locations".

The reader might have reasonably expected from this that, except for major landmarks, a road name would always be stated, whether or not an official name were quoted, but is left to puzzle over descriptions such as 'Site ID 38 The Ducky Haslingden' (Table 6.2). We note that RBC's response to Action 19.8 includes maps showing areas of open space with KKP reference numbers. It is therefore inexcusable that the Open Spaces report does not include comprehensive mapping.

I.1.4 Paragraph 2.2 is headed "Auditing local provision". It says that KKP's

"Field Research Team undertook the site audit for this study between February and June 2020 . . . Only sites publicly accessible are included (i.e. private sites or land, which people cannot access, are not included)."

This is most unclear. What is meant by "private sites"? Does it mean "land in private ownership"? If so, how does this apply to the treatment of churchyards and non-municipal burial grounds? What is meant by "people cannot access"? Exactly which people?

1.1.5 Paragraph 2.2 states that the site audit and report analyse listed typologies in accordance with the Companion Guidance to PPG17. That is not correct. One of the listed typologies that the report analyses is 'Urban greenspace', which is not a typology recognised in the Companion Guidance to PPG17. That Guidance contains an 'Amenity greenspace' typology, but that is not used by KKP.

1.1.6 Later, in paragraph 6.1, the report explains that 'Urban greenspace' is a typology claimed to be unique to Rossendale and which includes sites that would usually be categorised as amenity or natural greenspace.

1.1.7 In other words, far from using typologies in accordance with the Companion Guidance to PPG17, KKP have rejected 'Amenity greenspace', devised their own 'Urban greenspace' and narrowed the concept of 'Natural or semi-natural greenspace'.

1.1.8 Additionally, KKP have rejected the 'Outdoor sports facilities' typology of the Companion Guidance. This is not explained at paragraph 2.2, although the issue is considered at paragraph 1.1. Some outdoor sports facilities are included under 'Urban greenspace'

1.1.9 We identify below various inaccuracies in the report, which cast doubt on the value and reliability of the remainder.

1.2 Cemeteries, churchyards and other burial grounds

1.2.1 One of the typologies is "Cemeteries, churchyards and other burial grounds". In a paraphrase of the Companion Guidance to PPG17, their primary purpose is said to be:

"Provides burial space but sic is considered to provide a place of quiet contemplation and is often linked to the promotion of wildlife conservation and biodiversity".

Their description is

"Includes active burial provision such as cemeteries and closed sites like churchyards."

1.2.2 To state what an item includes does not describe or define it.

1.2.3 The implication that all cemeteries are open for burials but that all churchyards are closed is simplistic and wrong.

1.2.4 KKP's paragraphs 1.1, 2.2 and Table 3.1 abbreviate the category to 'Cemeteries/churchyards', and this expression is used in the heading to Part 9 and in paragraph 9.2 and Table 9.1. The captions to Tables 9.1, 9.4 and 9.5 refer only to 'cemeteries', but context suggests that this term includes 'churchyards'.

1.2.5 The accepted meaning of 'cemetery' is a 'place for burial of deceased persons' and its use by KKP alongside the word 'churchyard' suggests to the reader that Part 9 is exclusively concerned with such burial grounds. It is therefore totally inappropriate, distasteful and offensive to include a so-called 'Pet Crematorium and Memorial Gardens' (Site ID 455, Figure 9.1 and Table 9.3) in this Part of the report.

1.2.6 Even on KKP's terms the inclusion of Site ID 455 is questionable in view of paragraph 2.2, as it is a private site which the Field Research Team could not access as it was locked (note to Table 9.4).

1.2.7 KKP's paragraph 9.3 refers to accessibility:

"No accessibility standard is set for this typology, and there is no realistic requirement to set such standards. Provision should be based on burial demand."

We note (paragraph 12.2) that this means accessibility in terms of catchment (travel time and distance).

1.2.8 KKP's paragraph 9.2 confirms that no site size threshold has been applied and the note to Table 9.4 shows that inability to gain ready admission does not disqualify premises. We submit that at least ten sites have been wrongly omitted from the audit:

- St Anne's Churchyard, Ashworth Lane, Edgeside
- Stubbins Congregational/UR Church (demolished) Graveyard, Bolton Road North, Stubbins
- Longholme Methodist Churchyard, Bacup Road, Rawtenstall
- St Michael's on the Hill Churchyard, Burnley Road East, Lumb-in-Rossendale
- St John the Evangelist Churchyard, Burnley Road, Bacup
- Bethlehem Chapel Graveyard, Turnpike, Newchurch
- Providence Free Methodist Church (demolished) Graveyard, Burnley Road, Loveclough
- Friends' Burial Ground, Chapel Hill, Hurst Lane, Rawtenstall
- Grane Wesleyan Methodist Chapel (demolished) Graveyard, Calf Hey, Haslingden
- Assembled gravestones at the original site of St Stephen's Church, Haslingden Grane

1.2.9 The small scale of Figure 9.1 and the lack of addresses in Table 9.3 make the data in the report difficult to verify.

1.2.10 The Table Numbers jump from 9.1 to 9.3. Is there a Table 9.2 that has been omitted?

1.3 Natural and Semi-Natural Greenspace

1.3.1 KKP's Table 5.2 lists thirteen natural and semi-natural greenspaces, covering 368.02ha. That figure is said to be the total number in the Borough of such sites measuring 0.2ha or more (KKP's paragraph 5.2). Given that this typology can include woodland and scrub, grassland, heath or moor, wetlands, wastelands, bare rock habitats and commons, those numbers are improbably small, even if, as the report claims, "the focus is on sites providing wildlife conservation, biodiversity and environmental education and awareness" (paragraph 5.1)

1.3.2 KKP's Figure 5.1 is the first of a series of unclear maps. It shows fourteen sites: the thirteen identified in Table 5.2 plus, for reasons not stated, another (reference number 499, not named) which seems to lie entirely outside the Borough boundary.

1.3.3 KKP's Table 5.2 is annotated to the effect that only the part of 498 Healey Dell Nature Reserve that lies within Rossendale is counted. Figures 5.1 to 5.4 include 431 Dunnockshaw Memorial Garden, through which the Borough boundary appears to run, but there is no comparable note as to how, if at all, its area has been apportioned.

1.3.4 The second and third largest sites, Dearden Brook (62.81ha) and Lumb Mill (41.79ha), both located in Eden Ward and Eden Analysis Area, are described as inaccessible (note to Table 5.3). These are large sites in open country - it is therefore difficult to understand how they can be

inaccessible. If they are truly inaccessible, their inclusion is inconsistent with KKP's claim at paragraph 2.2 that "Only sites publicly accessible are included."

1.4 Urban Greenspace

1.4.1 KKP's Part 6 lists 127 Urban Greenspace sites, but they are not shown clearly on a map. Whether this typology is unique and specific to Rossendale (paragraph 6.1) is questionable but ultimately irrelevant.

1.5 Allotments

1.5.1 The note to Table 8.4 that Prinny Hill Allotments "could not be located and may no longer exist" is odd. If the report is to be a key part of the evidence base for the Local Plan, as claimed in Part I, it needs to be precise.

1.5.2 The "may no longer exist" remark is even more curious in view of RBC's website page about allotments, which states,

"Kirk Hill and Prinny Hill sites remain under our management. We maintain a register of tenants at Kirk Hill and Prinny Hill allotments. All new tenants are required to sign a tenancy agreement. The waiting lists are maintained on a first come, first allocated basis for each site. Tenants are not permitted to underlet, assign or part with the possession of the allotment garden."

1.5.3 We refer to Submission Document EB 005 Strategic Housing Land Availability Assessment 2017, Appendix E at page 220. SHLAA16307 Land to rear of Helmshore Road, Helmcroft states:

"The site is in RBC ownership ... The majority of the site is in use as allotments/smallholdings."

That suggests KKP should have listed it, but they do not.

1.6 Parks and Gardens

1.6.1 The small scale of Figure 4.1 and the lack of addresses in Table 4.2 make the data in the report difficult to verify.

1.6.2 We note the omission of Sparrow Park, Edenfield, located at the junction of Bolton Road North and Bury Road.

1.7 Appendix I Survey Results

1.7.1 This Appendix serves no useful purpose. Despite the endeavours of RBC's 'communication team' only 88 responses were received, which seems statistically insignificant if the Borough population is 71,482 (2019 mid-year population estimate).

1.7.2 We are not told the period over which the consultation was held, or what efforts, if any, were made to ensure that the respondents were a representative cross-section of the population, including ethnic and minority groups.

1.7.3 Whilst some of the questions are reproduced, it is not clear how respondents were invited to answer, for example, whether they were presented with options and asked to choose one or a number of them. The percentages in Figure A1.1.1 exceed 100%.

1.7.4 The reference on page 81 to 'question 5' suggests there were at least six questions, but we are told of only three.

1.7.5 With reference to page 79, it is not clear whether or how 'South Pennine Moors' was defined or why this particular area was singled out, in preference to the West Pennine Moors or any other area of natural greenspace.

1.7.6 The categories overlap. A local park might include a play area and/or teenage provision. A country park or the South Pennine Moors will contain a nature reserve, common or woodland. We are not told how the survey defined 'outdoor networks', but no doubt they also overlap with other categories.

1.7.7 'South Pennine Moors' is not shown in Figures A1.1.2 or A1.1.3. 'Outdoor networks' is not shown in Figure A1.1.3.

1.7.8 Paragraph A1.1 says there was more than one consultation, but no details of the other/s are provided.

1.7.9 Paragraph A1.1 states that the findings of the consultations were used, reviewed and interpreted to further support the report findings. As the online consultation was so flawed, its use for this purpose only diminishes any value in the report.

1.8 Appendix 4 Site Allocations Review

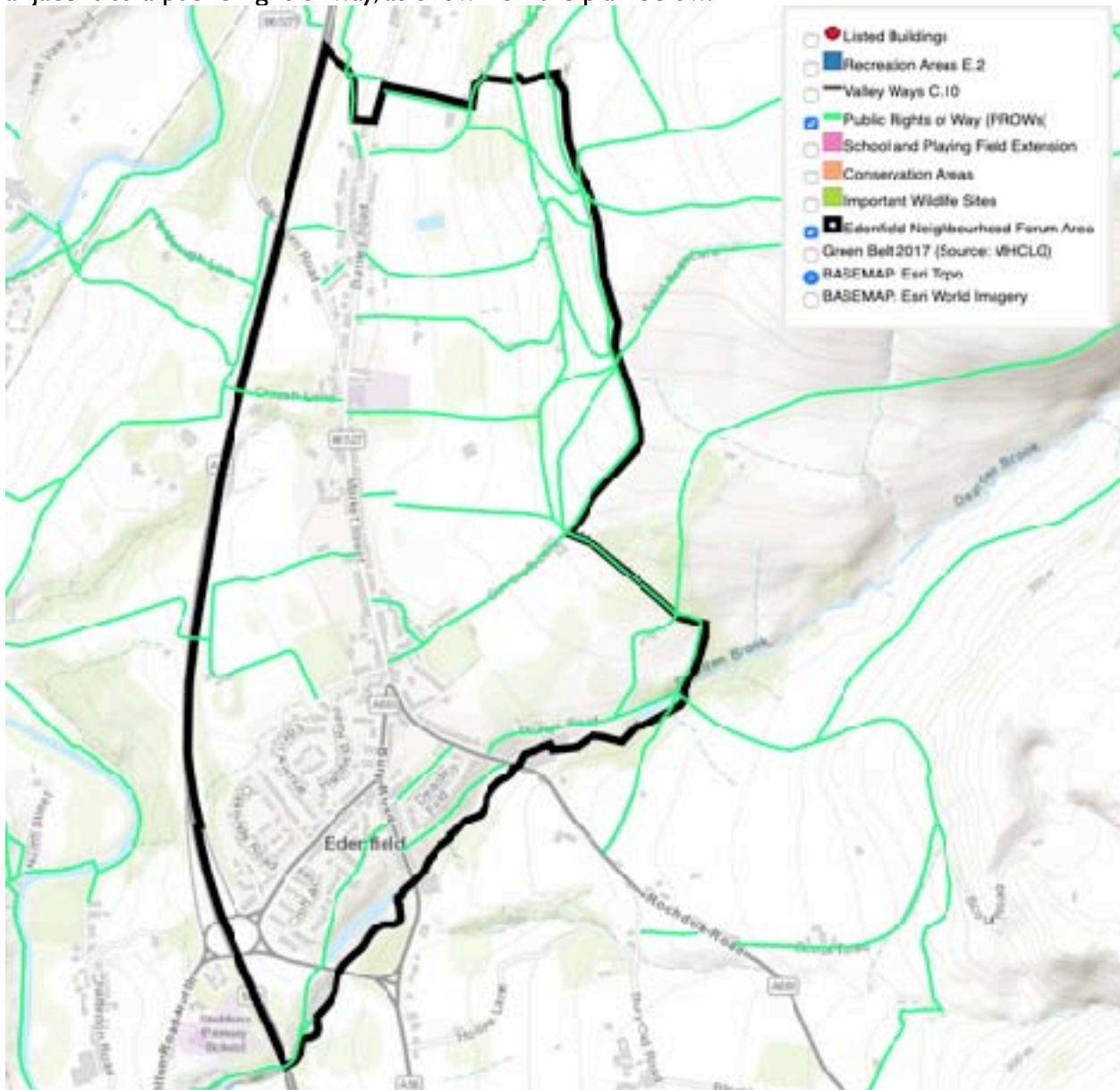
1.8.1 For both sites H72 Land west of Market Street, Edenfield and H73 Edenwood Mill, the report states erroneously (pages 91/92):

"The site is not included within the open space study as it is observed as a fenced field with no general public access or use."

1.8.2 At the northern end of H72 are woodland and a fenced field. Church Lane, a public right of way, then crosses the site from east to west. South of Church Lane some existing buildings in use, including the old Vicarage and the dwelling house called Alderwood, are included in the allocation and there is a large fenced area extending as far as a public footpath running westwards from Market Street past Mushroom House to the A56. South of this footpath is a fenced field, and south of that is another public footpath/private vehicular right of way. The southernmost portion of H72 is an unfenced field, to which the public enjoy permissive access. Please refer to EL1.002c(v) and the plan that follows paragraph 1.8.4 below showing public rights of way in the Edenfield area.

1.8.3 In short, the claimed observation of H72 as a "fenced field with no general public access or use" is hopelessly inaccurate. It includes four fields (three fenced with no public access, one unfenced with permissive access much used for canine exercise), a wooded area and buildings. The site is traversed by three public rights of way.

1.8.4 The observation of H73 is equally wrong. It is in fact a derelict mill with associated land. It is adjacent to a public right of way, as shown on the plan below.



2. RBC's Response

2.1 It is regrettable that RBC have accepted KKP's report without challenging its obvious defects. RBC must accept responsibility for all the errors and omissions.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

Action 8.005.2 – Employment Need and Supply

Representations by A.G. Ashworth and R.W. Lester regarding RBC's Paper dated January 2021

Contents

Page 1 Key Points

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Key Points

- **List is not comprehensive, significant number of omitted sites highlighted previously are still not included. (Refer to Page 2 paragraphs 1 – 2.)**
- **RBC have not examined every site to determine the net developable land on the site. (Refer to Page 2 paragraphs 1 – 2.)**
- **Net developable area is significantly lower than that predicted in RBC's response to Action Point 8.005.3. (Refer to Page 2 paragraph 3 and Appendix 3.)**
- **Keppie Massie figures confirm the Lichfields figure of 27 ha was grossly exaggerated. (Refer to Page 2 paragraphs 5 – 6 and Table at the end of Appendix 1.)**
- **Keppie Massie figure confirms there is a surplus of supply. (Refer to Page 2 paragraph 3 for supply data and Page 2 paragraph 6 for the real requirement.)**

Examination of the Rossendale Local Plan

Action 8.005.2 Employment Need and Supply

Representations by A.G. Ashworth and R.W. Lester regarding RBC's Paper dated January 2021

Representations

- 1) RBC have not included the sites that were wrongly omitted from their previous list which we highlighted in (EL 2.066i - ECNF- ELR 2a) and highlighted again in our response to Action Point 5.3 in the first tranche consultation on 1st December 2020.
- 2) These are existing sites, some of them very large and long established that for some reason RBC continue to disregard. There is little doubt there will be many more omitted as we were only in a position to identify the ones we knew through our local knowledge. When you examine the omitted site list it is difficult to comprehend how they could have been overlooked and thus any conclusion made from this questionable database can only be of very limited value.
- 3) RBC's new total of 23.59ha is considerably lower than their previous figures published in the Submission Version of the Plan (27.97ha) and their response to Action Point 8.005.3 (28.8ha). Both of the figures quoted by RBC have proved to be incorrect as we highlighted initially in EL 2.066i ECNF – ELR 1 and 2, and again in our response to Action Point 8.005.3. To confirm the errors we have provided all the background data in Appendix 3, however, we have to highlight that it has not been possible to explain all the changes fully as not all the information has been made available by RBC in their various documents. Even if the lowest of all the figures that RBC have submitted for Employment Land availability is used there is still more than double the actual amount required.
- 4) The sites that we highlighted previously where development has taken place have now been included but there does not appear to have been an in-depth physical check of all the sites to determine the net developable area, particularly those that continue to be omitted. In Appendix 3 we have highlighted that seven new buildings have been constructed on sites that showed no developable area was available. Again this means that any conclusions drawn from the database can only be of very limited value.
- 5) We have highlighted throughout the examination of the Local Plan that the Lichfields/RBC Employment Land Requirement figure of 27ha was grossly exaggerated and we have provided supporting evidence to support this claim on several occasions, including at the original Hearing in document (EL 2.066i – ECNF – ELR 6 & EL 6.013a.) It is interesting to note that Keppie Massie endorsed the statement made by Experian in December 2018 that growth would be reduced going forward.
- 6) We have listed in Appendix 1 our calculations which utilise the Keppie Massie data and they result in an Employment Land requirement of 10.5ha aligning very closely with our original submission based on the Experian data and calculation methodology of 10.72ha.

7) Additionally, in Appendix 2 we have provided the supporting evidence to the actual Land Losses which will occur during the Local Plan period. This has been achieved by examining all the sites in the Local Plan and then listing the ones that were identified previously as having been used for employment purposes but were now being proposed for other uses. The data show that just under 8.4ha of employment land is proposed to be used for housing during the Plan period.

Appendix 1:

Supply and Demand Trends – Keppie Massie FROM RBC’s Response to Action Point 8.015.1.

Year	Growth Square Feet	Growth Square Metres	Growth Hectares	Annual Average	15 Year Requirement
Projected Growth:					
2025	16307	1515	0.15		
2024	16463	1529	0.15		
2023	15604	1450	0.14		
2022	13421	1247	0.12		
2021	3038	282	0.03		
Totals	64833	6023	0.60	0.12	1.81
Previous 5 Years:					
2020	56995	5295	0.53		
2019	19246	1788	0.18		
2018	0	0	0.00		
2017	5332	495	0.05		
2016	0	0	0.00		
Totals	81573	7578	0.76	0.15	2.27

Based on a Growth figure of 1.81ha for the 15 years of the Plan we can then calculate the Employment Land Requirement as follows:

Growth: Keppie Massie	Land Losses* Refer To ECNF-ELR 6.1	Safety Buffer**: See below	Total Requirement for Plan Period of 15 yrs.
1.81ha	8.39ha	0.3ha	10.5ha

*The Land Loss figure was updated on 08.03.21 when checked against the current Plan. This figure of 10.5ha confirms our original calculation in EL 2.066i of 10.72ha which was based on the Experian data.

**The Safety Buffer figure is calculated by taking the average of the last five years completion figures in the Keppie Massie document EL 8.015.1 on Supply and Demand Trends.

Appendix 2:

ECNF – ELR 6.1 List of Former Employment Land Sites that will be used for Housing

Source of Information Updated Housing Trajectory and Committed Site Lists issued October 2019-EL4.014.

Housing Reference	Site Name	Net Dev Area (ha.)	Comments
H1	Greenbridge & Hall Carr Mill	1.28	SHLAA 16176
H12	Reedsholme Works	1.81	SHLAA 16190 Brownfield; 16191 Greenfield
H21	Reed Street Bacup	0.14	Only 0.14 Employment Land.
H23	Glen Mill, Newchurch, Stacksteads	0.17	
H25	Land at Blackwood Road, Stacksteads	1.03	SHLAA 16109 Brownfield; 16107 Greenfield
H35	Shadlock Skips, Stacksteads	0.72	
H36	Hare & Hounds Garage, Stacksteads	0.15	
H46	1, Laburnum St. Haslingden	0.04	
H54	Land at Ashworth Road, Water	0.06	
H55	Carr Mill & Bolton Mill, Cowpe	0.2	SHLAA 16116 Brownfield; 16117 Greenfield
H56	Knott Mill Works & Orchard Works	0.06	
H65	Albert Mill, Whitworth	1.14	
H68	Former Spring Mill	0	Not designated as Employment Land on Current Plan
H69	Cowm Water Treatment Works	0	Not designated as Employment Land on Current Plan
H70	Irwell Vale Mill	0	Not designated as Employment Land on Current Plan
H71	Land East of Market Street, Edenfield	0	Not designated as Employment Land on Current Plan.
H73	Edenwood Mill, Edenfield	0	Not designated as Employment Land on Current Plan.
M1	Waterside Mill, Bacup	0.09	
M3	Isle of Man Mill, Water	0.54	SHLAA 16397 Split Greenfield & Brownfield
Total		7.43	

Committed Site List. (As of 01/04/2019)

2018/0586	Land adj 444 Newchurch Road, Stacksteads	0.067	
2013/0577	Martin Croft, Hud Hey	0.1	
2015/0060	580, Bacup Road, Waterfoot	0.0068	
2016/0228	Croft End Mill, Stubbins	0.45	
2016/0294	Glen Works, Waterfoot	0.0062	
2016/0149	31, Burnley Road East, Waterfoot	0.0065	
2016/0217	Former CAB Offices, Whitworth	0.0152	
2016/0306 (Outline)	Cedar Works, Waterfoot	0.15	
2017/0440	29A, Burnley Road East, Waterfoot	0.01	
2018/0154	Rear of 85 Grane Road, Haslingden	0.12	
2018/0453	Workshop Rear of 175, Burnley Road	0.004	
2018/0265	8-10, Shawclough Road + Garage	0.02	
2019/0053	1, New Street, Haslingden	0.007	
Total		0.9627	
<u>Grand Totals</u>		<u>8.3927</u>	

Appendix 3: Employment Land Supply.

Comparison of the Site detail provided in the Submission Version of the Plan with RBC's responses to Action Points 5.3 and 5.2.

Columns 1 -5 are from RBC's Action 5.3 response dated 29th May 2020 and published circa early November 2020.

Column 6 is from the Submission Version of the Plan.

Column 7 is from RBC's Action 5.2 response dated January 2021 and published 29th January 2021.

Column 8 shows the differences between the Submission Version of the Plan and RBC's Action 5.2 response.

Column 9 shows the differences between RBC's Action 5.2 and Action 5.3 responses.

Second and third rows for a site relate to planning approvals noted in RBC's paper.

Note: seven of the developments listed were built on sites that were identified as having no development land available and these are marked in red.

**Site Review:
Table 1**

Emp Land Review (EB 017) EMP Ref	Local Plan EE Ref	EMP Size (Ha)	EE Gross Area (Ha)	EE Net Dev Area (Ha)	Submission Vers'n Plan Net Dev Area (Ha)	RBC's AP 5.2 Response	Differences Submission Version/ AP 5.2	Differences AP 5.3 / AP 5.2
60	1	2.36	2.36	0	0	0.01	0.01	0.01
10	10	5.87 *	2.8 *	0	0			
4	11	0.44	0.34					
9	12	8.38	7.74	0	1.7	1.7		1.7
19	13	1.51	1.5	0	1.36	1.36		1.36
35	14	1.43	1.39	0	0	0.06	0.08	0.08
35	14					0.02		
36	15	0.7	0.69	0	0			
37	16	22.88	20.56	0	0			
38	17	4.51	4.2	0	0			
39	18	14.6	15.97	0	0	0		
14	19	4.13	3.14	0	0.8	0.8		0.8
61	2	10.13	9.9	0.58	0.58	0.56		
61	2					0.02		
22	20	1	0.48	0	0			
92	21	0.75	0.64	0	0			
2	22	1.04	1.04	0	0			
5	23	0.29	0.29	0	0.06	0.06		0.06
8	24	8.1	3.66	0.5	0.5	0.1		
8	24		1.35			0.4		
47	25	1.65	2.48	0	0			
68	26	0.52	0.52	0	0			
17	27	0.56	0.56	0	0			
34	28	5.79	5.77	0	0			
63	29	1.09	1.05	0	0			
62	3	5.64	5.62	0	0	0.02	0.02	0.02
31	30	0.8	0.93	0	0			
54	31	3.07	3.06	0	0			
55	32	1.55	1.54	0	0			
56	33	1.79	1.78	0	0			

Emp Land Review (EB 017) EMP Ref	Local Plan EE Ref	EMP Size (Ha)	EE Gross Area (Ha)	EE Net Dev Area (Ha)	Submission Vers'n Plan Net Dev Area (Ha)	RBC's AP 5.2 Response	Differences Submission Version/ AP 5.2	Differences AP 5.3 / AP 5.2
57	34	2.29	2.28	0	0	0.03	0.03	0.03
57	34					0.02	0.02	0.02
58	35	1.15	1.4	0	0			
6	36	1.34	1.33	0	0			
41	37	3.63	3.45	0	0			
43	38	5.19	5.17	0	0			
44	39	2.43	2.42	0	0	0.03	0.03	0.03
90	4	0.32	0.32	0	0			
46	40	6.06	6.04	0	0			
20	41	0.65	0.65	0	0			
24	42	3.48	1.84	0	0			
51	43	7.38	7.02	0	0.18	0.08	- 0.08	0.1
51	43		0.01			0.01		
51	43		0.01			0.01		
53	44	1.64	1.46	0	0			
69	45	0.41	0.41	0	0			
52	46	0.86	0.82	0	0			
64	47	0.7	0.69	0	0.28	0.28		0.28
65	48	1.86	1.85	0	0			
66	49	1.87	1.86	0	0			
59	5	0.78	0.78	0	0			
67	50	1.23	1.2	0	0			
70	51	1.36	1.35	0	0			
49	6	5.25	4.72	0	0			
50	7	3.82	3.77	0	0			
45	8	2.89	2.88	0	0			
88	9	0.82	1.01	0	0			
89	M1	0.17	0.09	0.09	0.09	0.09		
1	M2	1.57	1.56	1.56	1.56	0	-1.56	-1.56
1	M2					0.01	0.01	0.01
21	M3	1.13	1.13	0.51	0.51	0.51		
18	M4	4.6	4.59	0	0	1.13	1.13	1.13
18	M4					0.53	0.53	0.53

Emp Land Review (EB 017) EMP Ref	Local Plan EE Ref	EMP Size (Ha)	EE Gross Area (Ha)	EE Net Dev Area (Ha)	Submission Vers'n Plan Net Dev Area (Ha)	RBC's AP 5.2 Response	Differences Submission Version/ AP 5.2	Differences AP 5.3 / AP 5.2
	M5		0.86	0.4	0.4	0	-0.4	-0.4
10	NE1	5.87	2.81	2.81	2.81	1.57	-1.24	-1.24
13	NE2	3.02	3.43	2.7	2.7	2.03	-0.67	-0.67
ADD6	NE3	5.69	5.67	4.84	4.84	4.26	-0.58	-0.58
11	NE4	2.74	6.18	5.2	5.2	3.43	-1.77	-1.77
72	NE4	4.81	6.18	5.2				-5.2
12	NE5	4.93	4.92	4.4	4.4	4.4		
Sub Total		196.65	190.72	28.79	27.97	23.53	- 4.44	- 5.26

* EMP10 is in both rows 3 and 66. The asterisked figures are not counted in the sub-totals.

Table 2:

List of sites completed during 2019-20 which were not included in the main site list above:

Planning Ref.	Gross Area (Ha) AP 5.2	Net Area (Ha) AP 5.2	Differences Submission Version/ AP 5.2	Differences AP 5.3 / AP 5.2
2018/0346	0.26	0.01	0.01	0.01
2015/0286	0.01	0.01	0.01	0.01
2018/0295	0.08	0.08	0.08	0.08
2018/0555	0.01	0.01	0.01	0.01
2019/0064	0.1	0.04	0.04	0.04
2020/0003	0.01	0.01	0.01	0.01
Sub Total	0.47	0.16	0.16	0.16
Total	196.65	191.19	28.79	27.97
		23.69	- 4.28	- 5.1

Note: four of the sites listed were effectively only change of use and three of these were not even on the employment site list in the Submission Version of the Plan. These are coloured blue for identification.

Additionally, as we have pointed out on several occasions, there are many sites not on any of the lists and RBC's reluctance to introduce a comprehensive review continues to devalue this whole exercise. RBC's figure for the Net Developable area remains questionably low in reality; however it is still more than double their Employment Land Requirement.

Table 3:

We have prepared this additional table to confirm that our original figure of 35.97ha was accurate had RBC included **all** the identified net developable areas in their response to Action Point 5.3 on the 29th May 2020.

Emp Land Review (EB 017) EMP Ref	Local Plan EE Ref	EMP Size (Ha)	EE Gross Area (Ha) *	EE Net Dev Area (Ha)	Submission Vers'n Plan Net Dev Area (Ha)	RBC's AP 5.2 Response	Differences Submission Version/ AP 5.2	Differences AP 5.3 / AP 5.2
*	NE4				5.2*			
18	M4			2.8	2.8		-2.8	-2.8
9	12			1.7			-1.7	
19	13			1.36			-1.36	
14	19			0.8			-0.8	
5	23			0.06			-0.06	
51	43			0.18			-0.18	
64	47			0.28			-0.28	
Sub Total				7.18	2.8		-7.18	-2.8
<u>Grand Totals.</u>				<u>35.97</u>	<u>35.97</u>			

*RBC included only one of the NE4 sites in their Submission Version of the Plan, but provide details of the two sites referred to as EMP 11 and EMP 72 in their response to Action Point 5.3.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

Action 8.006.1 - Provision for Retail and Other Town Centre Uses

Representations by A. G. Ashworth and R. W. Lester about RBC's Paper dated January 2021

Contents

Page 1 Key Points

Page 2 Representations

Key Points

- The 2040 Vision documents for Rawtenstall, Haslingden and Bacup can contribute to and accelerate the conversion of large empty buildings for residential purposes
Please refer to paragraphs **1.3 & 1.4** below
- Use of readily available non-Green Belt sites suitable for housing would assist in realising the Visions for Bacup and Haslingden Paragraphs **1.5 & 1.6**
- Concept of 'local town centre uses' unclear in context of retail hierarchy **RBC Paper, pages 2, 22 & 27**
- Edenfield's delineated Neighbourhood Parade lacks crucial element: no provision for top-up shopping **RBC Paper, pages 2, 17, 18 & 22**
- No discussion of the shopping offers in Rawtenstall and Bacup Centres outside the Primary Shopping Areas **RBC Paper, pages 4 & 6**
- Untrue claim of regular service from East Lancashire Railway onto national rail network **RBC Paper, page 4**
- No detail about which Plan policies will help deliver the 2040 Visions for Haslingden and Bacup and how other planning documents will contribute to achieving the objectives. **RBC Paper, pages 7 & 10**
- Representations offer in-depth analysis of inaccurate, imprecise and unsuitable wording of proposed main modifications. **RBC Paper, pages 22 to 32**

Examination of the Rossendale Local Plan

Action 8.006.1 - Provision for Retail and Other Town Centre Uses

Representations by A. G. Ashworth and R. W. Lester about RBC's Paper dated January 2021

Representations

1. Introduction

1.1 This response examines RBC's paper line by line and comments on errors in the paper and aspects of the Retail policies in the emerging Plan, as proposed to be modified, which are inaccurate or unclear and which require further attention. Corrections and improvements are suggested.

1.2 In a number of cases a comment applies to more than one part of RBC's paper. If a comment is going to be repeated, the relevant subsequent page is stated.

1.3 We note from RBC's paper at page 4, paragraph 2.4, that the proposed Rawtenstall 2040 Vision will consider re-purposing large, empty buildings. In the last twelve months more than fifty apartments in the centre of Rawtenstall have gained planning permission, and the Vision is likely to accelerate this trend by identifying more such opportunities.

1.4 We welcome and support the proposals to regenerate Bacup and Haslingden District Centres with particular reference to potential residential development, as mentioned in RBC's paper at page 7, paragraph 3.7, bullet points 2, 4, 7 and 8, and at page 10, paragraph 3.18, bullet points 1 and 5.

1.5 We note (page 6, paragraph 3.5) that the Bacup 2040 Vision recognises the town's potential as a desirable location for new housing and refer again to the availability of non-Green Belt land that could provide in excess of 900 dwellings [SHLAA references 16041, 16046, 16048, 16049, 16050 and 16375 (**EL9.002**, Part 2, pages 229, 231, 252/3, 298-301, 264/5 and 308) and site EMP91 (*ibid.*, page 251)]. The suitability of those sites has been endorsed by a local expert Chartered Town Planner,

1.6 Likewise, in Haslingden non-Green Belt sites such as SHLAA references 16345 and 16346 (**EL9.002**, Part 2, pages 310 -312) and the old mill on Hargreaves Street are opportunities for housing development.

2. Errors, omissions and lack of clarity in RBC's paper

Page 2, Page 22 (Inset Table) and Page 27 (Table)

In the heading to column 3 of the Table add "or Parade".

In row 3 of the Table the concept of "local town centre uses" is unclear and requires definition, particularly as Town Centre and Local Centres are separate ranks from District Centres in RBC's retail hierarchy.

Pages 2 (Table, row 5), 17, 18 and 22

Contrary to its supposed role and function, the Edenfield Neighbourhood Parade, as delineated, does not provide for top-up shopping.

Page 4 Section 2

This is limited to discussion of the Primary Shopping Area and thus is incomplete. Given that the Town Centre, as shown by the magenta edge, includes the Asda and Tesco superstores and the shopping offer on Bury Road, Bacup Road and Kay Street, it is odd that there is no discussion of their roles in the Centre.

Page 4 Paragraph 2.1

The heritage surface of Bank Street covers only the length between Barlow Street and Kay Street, not its full length, and consists of setts, not cobbles.

Page 4 Paragraph 2.2

Change “Both this” to “This” and change “covered by” to “within”
It is unclear what is meant by “the wider centre”.

Page 4 Paragraph 2.3

Delete either “e.g.” or “etc”.

Page 4 Paragraph 2.4

In last two lines, use capitals for Town Square, and delete incorrect “roundabout”

Page 4 Paragraph 2.6

It is simply untrue to state that there is a regular train service from the East Lancashire Railway onto the national rail network. Except for the occasional special excursion, passenger services run between Rawtenstall and Heywood only. There is an advertised passenger timetable, but, as it is a heritage railway, times and operational days vary according to the season. To describe the service as regular is therefore misleading.

Page 6 Paragraph 3.1

This neglects to refer to the shopping provision on Rochdale Road, King Street and Irwell Street within the Primary Shopping Area, although these are mentioned in the explanation to Policy R3, paragraph 155.

Page 6 Paragraph 3.2

Presumably there should be a comma after “grocer”.

Page 7 Paragraph 3.7

This paragraph lacks any detail about which policies in the Local Plan will help deliver the vision and how other planning documents will contribute to achieving the objectives.

Page 10 Paragraph 3.17

Delete “etc”.

Page 10 Paragraph 3.18

This paragraph lacks any detail about which policies in the Local Plan will help deliver the vision and how other planning documents will contribute to achieving the objectives.

Page 10 Paragraph 3.18, seventh bullet

Delete apostrophe.

Page 10 Paragraph 3.18, tenth bullet

Delete “etc”.

Page 10 Paragraph 3.19

Should “stream” be singular or plural?

Pages 10 and 11 Paragraphs 3.19 and 3.20

There seems to be confusion about whether it will be Cockerill Square or Cockerills Square.

Page 11 Paragraph 3.20

The crossroads were better described as Deardengate, Manchester Road and Blackburn Road.

Page 13 Paragraph 4.3

Presumably the first word should be Crawshawbooth, not Rawtenstall.

Page 16 Paragraph 4.8

It is questionable whether Whitworth High School is near the delineated Local Centre and whether this is relevant. The proximity of schools to the other Centres and Parades is not discussed.

Pages 17 and 18: Map and Paragraph 5.1. See also Page 22 (Inset Table) and Page 27 (Table). As noted above against page 2, contrary to its supposed role and function, the Edenfield Neighbourhood Parade, as delineated, does not provide for top-up shopping.

Page 21 Paragraph 6.1

Presumably “or” means “of” and “Regulations” means “Order”.

Page 22 (Inset Table) and Page 27 (Table)

In the heading to column 3 add “or Parade”.

In row 3 “locally” should read “locality”.

In row 3 the concept of “local town centre uses” is unclear and requires definition, particularly as Town Centre and Local Centres are separate ranks from District Centres in RBC’s retail hierarchy. In row 5 the Edenfield Neighbourhood Parade, as delineated, does not provide for top-up shopping.

Page 22 (Main Table, row 2) and Page 26 Policy R1 wording

Amend “district, local and” to “district and local centres and”

Page 22 (Main Table, row 3) and Page 26) Policy R1 wording

Change “regulations” to “Order” (page 22 only)

Given that Local Centres do not have a delineated PSA, “town, district and” should be replaced by “town and district centres and in”

Page 22 (Main Table, row 4) and Page 27 Policy R1 wording

As noted below, Policy R4 as amended is unsatisfactory. If RBC do not accept that Use Class F.2(a) encompasses all local shops, they must provide their own definition. In either case the need for “situated outside of town, district, local centres or neighbourhood parades” as proposed here for Policy R1 would be obviated.

Page 22 (Main Table, row 6) and Page 28 Policy R1 explanation, new para 145

Amend “While in Bacup” to “In Bacup”.

The £2.2m grant might have been received for the District Centre but not by it. Amendment required.

Page 23 Table, row 3 and Page 29 Policy R1 explanation, para 151

“regulations” should read “Order” (Page 23 only)

Amend “The loss” to “Development proposals involving the loss”.

In the footnote amend “include business” to “namely, use”

Page 23 Table, row 5

“regulations” should read “Order”.

Page 23 Table, row 6

It is not clear why column 2 refers to paragraph 156 when column 3 is concerned with paragraph 153.

Page 24 Table, row 1 and Page 30 Policy R2 explanation, para 153

It is not clear where the Valley Centre site is identified as a ‘Future Primary Shopping Area Extension. The Map Key on page 3 and the Policy itself do not use the word ‘Future’.

The Policies Map needs to be updated.

Page 24 Table, row 3 and Page 30 Policy R3 wording

The term “these centres” is used twice in row 3 of the Table and three times in the Policy, and “the centre” once in the Policy, all in lower case, but even with the dubious benefit of comparison with the previous wording, there is ambiguity as to whether those terms cover Neighbourhood Parades.

The Policies Map needs to be updated.

Page 24 Table, row 4 and Page 30 Policy R3 wording

“regulations” should read “Order” (Table only)

In a), unless the widening of the types of development that are to be permitted is deliberate, insert after “E”: “(a), (b), and (c)”

Also in a), delete the superfluous and colloquial “for Pub and” (Table) / “for pub and” (Policy).

In (c) amend “E” to “E(a)”, although the parenthesis seems unnecessary, and hyphenate “12 month”.

Page 24 Table, row 5 and Page 31 Policy R3 explanation, paragraph 154

“regulations” should read “Order” (Table only)

Insert after “E”: “(a), (b), and (c)”, unless the widening of the types of development that will be protected is deliberate.

Delete “Sui generis uses such as drinking establishments” and replace with “drinking establishment uses (sui generis)”. RBC’s proposed wording is poor because it opens the door to other sui generis uses.

Reinstate “and” before “local”

It is unclear whether “the centres” or “the centre” is apt to include a Neighbourhood Parade.

Page 25 Table, row 1 and Page 31 Policy R4 wording

“regulations” should read “Order” (Table only)

The words “to clarify that the policy applies to all locations in the retail hierarchy” are strange - the policy applies to ‘local shops’, which are unlikely to be found in the Town Centre or District Centres. (Table only)

Use Class F.2(a) would seem to cover the ‘local shops’ contemplated by Policy R4. Reference to Use Class E(a) is therefore unnecessary and confusing.

Therefore further amend the policy text by deleting all the words in brackets except “Use Class F.2(a)” and by deleting “outside of the defined town, district and local centre or neighbourhood parade boundaries”.

If it is considered that some local shops fall outside Class F.2(a), then the term “local shop” should be clearly defined.

Page 25 Table, row 2 and Page 32 Policy R4 explanation, para 156

Avoid US usage by deleting “of”.

Page 25 Table, row 3 and Page 32 Policy R4 explanation, para 156

The words “to clarify that the policy applies to all locations in the retail hierarchy” are strange - the policy applies to ‘local shops’, which are unlikely to be found in the Town Centre or District Centres. (Table only)

Avoid US usage by deleting “of”.

Hyphenate “day to day”.

Page 25 Table, row 4 and Page 32 Policy R4 explanation, para 157

Column 2 of the Table refers to paragraph 156, but it should refer instead to paragraph 157.

Delete “the government introduced changes to”, and replace “to enable” by “was amended to facilitate”.

Delete “not surrounded by” as this is confusing and inaccurate and replace with “which are more than 1000 metres from”. Delete “within 1000 metres”.

The new first sentence of paragraph 157, dealing with the re-purposing of buildings on high streets is oddly positioned, as preceding paragraph 156 and the rest of paragraph 157 are concerned with local shops.

Page 25 Table, row 6 and Page 32 Policy R5

The fourth bullet needs to be expressed, like the other bullets, as a criterion for support and should therefore be amended. Please refer to comments below about page 32 Policy R5.

Page 26 Policy R1 wording

In second paragraph of Policy, amend “district, local and” to “district and local centres and”.

The fifth paragraph is unclear. If, for example, a retail development were proposed midway between Rawtenstall Town Centre and Waterfoot Local Centre (assuming that there would be a way of determining this, would the impact assessment trigger be 400 or 200 sq.m?

The sixth paragraph refers to the PSA of local centres, but the local centre maps (pages 12, 14 and 15 of RBC’s paper) do not indicate any PSA.

The sixth paragraph should begin “A proposal that requires . . .”, not “Proposals that require . . .”, as the first three bullets begin “It . . .”.

Page 27 Policy R1 wording

As noted below, Policy R4 as amended is unsatisfactory. If RBC do not accept that Use Class F.2(a) encompasses all local shops, they must provide their own definition. In either case the need for “situated outside of town, district, local centres or neighbourhood parades” as proposed here for Policy R1 would be obviated.

Page 27 Table

In the heading to column 3 add “or Parade”.

In row 3 “locally” should read “locality”.

In row 3 the concept of “local town centre uses” is unclear and requires definition, particularly as Town Centre and Local Centres are separate ranks from District Centres in RBC’s retail hierarchy.

In row 5 the Edenfield Neighbourhood Parade, as delineated, does not provide for top-up shopping.

Page 28 Policy R1 explanation, new para 145

Amend “While in Bacup” to “In Bacup”.

The £2.2m grant might have been received for the District Centre but not by it. Amendment required.

Page 29 Policy R1 explanation, para 151

Amend “The loss” to “Development proposals involving the loss”.

In the footnote change “include business” to “namely, use”

Page 30 Policy R2 explanation, para 153

It is not clear where the Valley Centre site is identified as a ‘Future Primary Shopping Area Extension. The Map Key on page 3 and the Policy itself do not use the word ‘Future’.

The Policies Map needs to be updated.

Page 30 Policy R3 wording

The term “these centres” is used three times in the Policy, and “the centre” once, all in lower case, but even with the dubious benefit of comparison with the previous wording, there is ambiguity as to whether those terms cover Neighbourhood Parades.

In a), unless the widening of the types of development that will be permitted is deliberate, insert after “E”: “(a), (b), and (c)”

Also in a), delete the superfluous and colloquial “for pub and”.

In (c) amend “E” to “E(a)”, although the parenthesis seems unnecessary, and hyphenate “12 month”

Page 31 Policy R3 explanation, paragraph 154

Insert after “E”: “(a), (b), and (c)”, unless the widening of the types of development that will be protected is deliberate.

Delete “Sui generis uses such as drinking establishments” and replace with “drinking establishment uses (sui generis)”. RBC’s proposed wording is poor because it opens the door to other sui generis uses.

Reinstate “and” before “local”

It is unclear whether “the centres” or “the centre” is apt to include a Neighbourhood Parade.

Page 31 Policy R4 wording

Use Class F.2(a) would seem to cover the 'local shops' contemplated by Policy R4. Reference to Use Class E(a) is therefore unnecessary and confusing.

Therefore further amend the policy text by deleting all the words in brackets except "Use Class F.2(a)" and by deleting "outside of the defined town, district and local centre or neighbourhood parade boundaries".

If it is considered that some local shops fall outside Class F.2(a), then the term "local shop" should be clearly defined.

Page 31 Policy R4 explanation, para 156

Avoid US usage by deleting "of", twice.

Hyphenate "day to day".

When the subject is "local shops", the verb should be "constitute", not "constitutes". Amendment required.

Page 32 Policy R4 explanation, para 157

Delete "the government introduced changes to", and replace "to enable" by "was amended to facilitate".

Delete "not surrounded by" as this is confusing and inaccurate, and replace with "which are more than 1000 metres from". Delete "within 1000 metres".

The new first sentence of paragraph 157, dealing with the re-purposing of buildings on high streets is oddly positioned, as preceding paragraph 156 and the rest of paragraph 157 are concerned with local shops.

Page 32 Policy R5

The second bullet is unclear. Does it mean "where the proposed development would be located in a town or district centre but outside the primary shopping area, it is . . ." ? If so, it should be amended to say so.

The fourth bullet needs to be expressed, like the other bullets, as a criterion for supporting an application.

Whether Public Health England (PHE) actually classify the pupils, as the proposed wording states, is doubtful. PHE is responsible for national oversight of the National Child Measurement Programme and provides operational guidance: local authorities obtain relevant data and return them to NHS Digital; PHE publishes small area data at ward level.

Limitations on the data include: (i) a parent or carer may withdraw their child from the process and (ii) the data are sourced from state-maintained schools only, excluding private school pupils and home-schooled children.

It follows that it is essential to relate the criterion to the NCMP data.

We assume that "more than" is meant to apply to both percentages.

The fourth bullet should therefore be amended to read: "the proposed development is not in a ward where more than 15% of Year 6 pupils or more than 10% of Reception class age pupils are classified as obese according to National Child Measurement Programme data".

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

Action EL8.007.2

RBC Paper dated 20 January 2021 re Rawtenstall Gyrotory Improvement Scheme

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

Contents

Page 1	Requirements of Action 8.007.2
Page 1	Key Points
Page 2	Representations

Requirements of Action 8.007.2

Produce a note on the Strategy and Action Plan for the Rawtenstall Gyrotory Improvement Scheme. This should set out:

- i. Details, costs and the actions and timetable for implementing Plan A and Plan B if required with the associated triggers points.*
- ii. It should also set out the details of all parties involved in the schemes and the details of any necessary agreements and consents.*
- iii. The action plan should set out what would happen if the funding application is unsuccessful.*

Key Points

- **Appendix 1 to RBC paper - labels on plan are illegible and costings almost illegible**
- **No information about timetables. Trigger points at the mercy of development cash flow**
- **Section 278 funding unrealistic - no nexus between Gyrotory and particular developments**
- **Section 106 funding unrealistic - too many other calls**
- **Not clear what would happen if funding bid fails**
- **No information supplied about parties involved and necessary agreements/consents**
- **RBC's paper lacks detail, is thoroughly inadequate and does not add to what was known at the Hearing**

Examination of the Rossendale Local Plan

Action EL8.007.2

RBC Paper dated 20 January 2021 re Rawtenstall Gyratory Improvement Scheme

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

Representations

1. Introduction

1.1 RBC were asked by the Inspectors to -

Produce a note on the Strategy and Action Plan for the Rawtenstall Gyratory Improvement Scheme. This should set out:

i. Details, costs and the actions and timetable for implementing Plan A and Plan B if required with the associated triggers points.

ii. It should also set out the details of all parties involved in the schemes and the details of any necessary agreements and consents.

iii. The action plan should set out what would happen if the funding application is unsuccessful.

2. Representations

2.1 A strategy, consisting of some details and costs, is reproduced at Appendix 1 to RBC's paper, but so poorly that the labels on the plan are illegible and the costings are almost illegible.

2.2 No more information than was available at the Examination Hearing has been provided.

2.3 Page 1 refers to two scenarios, which presumably are Plans A and B.

2.4 There is no information about timetables. Trigger points, we are told, will effectively be at the mercy of development cash flow.

2.5 We question whether using section 278 funding is realistic. This normally applies when a developer carries out highway alterations associated with the development.

2.6 With many calls on section 106 contributions, we question how their availability to fund the Gyratory improvements would be ensured.

2.7 It is not clear what will happen if the funding application is unsuccessful.

2.8 There is no information about parties involved and no details of necessary agreements and consents.

3. Conclusion

3.1 RBC's paper lacks detail, is thoroughly inadequate and does not add to what was known at the Examination Hearing.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum
19th March 2021

Examination of the Rossendale Local Plan

Actions 14.1 to 14.4 - Housing Site Allocations - Edenfield, Helmshore, Irwell Vale and Ewood Bridge (with Appendices)

Representations by A. G. Ashworth and R. W. Lester about RBC's Undated Response

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Key Points - Site H71 (please see pages 4 and 5 below)

- Veracity of brownfield land description is doubtful - what previous buildings?
- At least 60% in Green Belt - but RBC call this "a small part"
- Improbable claim by RBC that revised boundary would be defensible in long term
- LUC report is only a draft

Key Points - Site H72 (please see pages 5 to 18 below)

Access and Transport Unresolved - see separate submissions by SK Transport on behalf of ECNF

- Still no detailed assessment of how any of the three parts of H72 could be accessed safely

Access to central part from Market Street

- Absence of technical information about site access
- Lack of technical modelling for any layout of a new junction
- Ghosted right turn essential and requires demolition of 2 houses

Access to northern part via field adjacent to 5 Blackburn Road

- Visibility splays/loss of on-street parking/proximity to signalised junction and school
- Increased demand for parking and drop-off/pick-up at enlarged school

Access to southern part

- Belated recognition of unsuitability of Exchange Street is a fundamental change
- RBC/LCC must say how access would be controlled and comment on technical modelling including impact on other local streets
- Market Place mini-roundabout capacity issues
 - RBC/LCC must comment on technical modelling and provide technical solution
 - Full assessment needed before determining appropriate quantum of development
- Overall, failure to carry out appropriate technical assessment, review and due diligence
- No confidence in site deliverability from traffic and transport perspective

Education:

- Unresolved - little, if any, significant additional information Pages 5 & 6 below
- 1.5 form entry at one school would not provide required extra 148 places Page 5
- Site allocation therefore premature Page 6
- Drop-off/pick-up arrangements unsatisfactory for increased school roll Page 6

Green Belt:

- LUC report only in draft
- Unconscionable that loss of one Green Belt site leads to inroads into another Page 6
- Assumption about development timetable now shown to be misplaced Page 7
- Major urban sprawl Page 7

Harm to heritage assets

Pages 7 to 16

- Requested explanation and map not provided
- Inadequately researched Memorandum -
 - contradicts RBC's previous evidence,
 - does not consider relevant NPPF and Historic England guidance,
 - draws unwarranted conclusions,
 - suggests superficial solutions,
 - does not require any dwellings to be constructed in traditional form and style,
 - does not consider 2-storey limit or control of materials etc in any development, and
 - is written on the basis of determining a planning application

Plan unsound - lacks required positive heritage strategy - NPPF, para 185 Page 10, para 5.3

Land stability issues remain to be addressed

Page 17

Policies Map must be redrawn - inconsistent with 'Greenfield' in Table 1 (HS2)

Page 17

Principal reasons why allocation of site H72 should be deleted:

Page 18

- **Green Belt:** No exceptional circumstances to justify release.
- **Landscape:** "Not suitable for development on landscape grounds" - Penny Bennett report
- **Culture and Heritage:** Harm to setting of Grade II* listed Edenfield Parish Church.
- **Character:** Proposed growth for Edenfield is disproportionate
- **Gateway to Borough:** At the main southern gateway, unspoilt by development and with extensive views eastwards, site strengthens impression of Rossendale as an attractive place in which to live and work.
- **Transport:** Access issues all unresolved.
- **Education:** School expansion remains unresolved.
- **Infrastructure:** Insufficient - please refer to submissions by SK Transport Planning Ltd
- **Human Health:** Significant issues, particularly -
 - Noise, and air and light pollution from busy A56,
 - More than the sustainable distance from A&E hospitals and GP surgeries
- **Geotechnical issues:** Parcel 43 includes large area of laminated clay tipped on laminated clay.

Examination of the Rossendale Local Plan

Actions 14.1 to 14.4 - Housing Site Allocations - Edenfield, Helmshore, Irwell Vale and Ewood Bridge (with Appendices)

Representations by A. G. Ashworth and R. W. Lester about RBC's Undated Response

Representations

Action 14.1: H70 Irwell Vale Mill, Irwell Vale. We support this development on the basis that it makes use of a disused factory site and should significantly reduce the serious flooding problems in Irwell Vale.

Action 14.2: H71 Land east of Market Street, Edenfield

The assessment set out at Appendix 2 to RBC's paper is only in the form of a draft report prepared over a year ago, in January 2020.

RBC and LUC assert that the site is brownfield. On an application of the NPPF definition of 'previously developed land' to the site as delineated on the Policies Map, we question that statement and ask, 'What permanent structure/s (excluding agricultural buildings), or their curtilage, occupy or last occupied the land?'

RBC refer at paragraph 3.3 of their paper to '*this previously developed land, of which a small part is in the Green Belt*'. 'Previously developed' is dubious. 'Small part is in the Green Belt' is less than the whole truth. Even a cursory comparison of the Policies Map (EL1.002c(v)) and the map of GB(Minor)25 at the top of page 92 of Proposed Green Belt and Urban Boundary Changes (EL1.002d(i)) shows that at least 60% of site H71 is in the Green Belt.

In the same paragraph the phrase '*given the current small part of uses of the land*' makes no sense.

Nor is it clear how allowing development of site H71 would, as RBC claim, help to provide a defensible long-term boundary. It is more likely to serve as a launch-pad for further urban sprawl.

We note that, in their determination to concrete the Green Belt in Edenfield, RBC are disregarding the draft opinion in LUC's paragraph 3.4.

We make no comment on the merits of allocating site H71 but submit that any decision thereon should be based on a full understanding of the facts.

Action 14.3: H72 Land west of Market Street, Edenfield

i "Lancashire County Council to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3"

Please refer to representations made by SK Transport Planning Limited on behalf of Edenfield Community Neighbourhood Forum in a separate response.

ii "Provision of additional information regarding education requirement in Edenfield – feasibility to expand Edenfield or Stubbins Primary Schools"

Please note: paragraph numbers in this section refer to those in RBC's paper.

4.2.1: *"LCC Education Department are looking to accommodate 148 additional primary pupil places in Edenfield, as a result of this proposal. This figure is expected to be a maximum as it is based on all properties having 4-bedrooms. Also of note, the estimate considers pupil projections at the time. These pupil projections are expected to be re-run soon."*

Note the current nominal capacity for Edenfield Church of England Primary School is 175, this therefore means an expansion of 84% if, as suspected, Edenfield is chosen due to the challenges of operating Stubbins County Primary School on two levels.

4.2.2: *"[LCC] held initial discussions with both[schools] to ascertain if it is appropriate pursuing further work relating to the feasibility to expand one of these schools to 1.5 form entry. Both schools indicated an interest although as the Education Authority makes clear "this will require a full and comprehensive statutory consultation process, which will involve representatives from the Manchester Diocese for Edenfield Church of England Primary School."*

Over seven years a 1.5 form entry at Edenfield CEPS would nominally accommodate only 88 more pupils, leaving 60 of the 148 without provision. Edenfield CEPS is normally over-subscribed, with 196 pupils at present, as confirmed by the school by telephone on 18th March 2021. A 1.5 form entry would therefore nominally accommodate only 67 pupils more than the actual present number, leaving 81 of the 148 without provision. In other words the issues of which school, expansion, by what amount and feasibility are far from being resolved.

4.2.3: Feasibility:

Edenfield *Based on Department of Education guidance, a requirement of 2,100 m² would be required from the third party owners. This would allow the additional building, potentially on the existing hard surface play area, which would require replacement. As yet a full feasibility has not been carried out which allows for a full design concept and full cost analysis to take place.*

Stubbins *The situation at Stubbins CP allows the potential expansion of the existing school up to 1.5 form entry without additional land. However, after an initial site visit **the varying land levels may provide challenges to link the required number of classrooms and services required** (our emphasis). The full cost implications and*

site access will require considerable planning and full feasibility. LCC Education report that parts of the school operate on two levels which presents day to day operation challenges.

Feasibility Studies Unfortunately LCC has been unable to proceed with the full feasibility study for each school due to staff being re-deployed as a result of Covid. Nevertheless, there are certainly options available to ensure that primary school places can be accommodated within Edenfield. **The County Council is fully aware of the need to accommodate this proposal and this will need to be addressed in the Masterplan work** (our emphasis)."

In other words the issue is far from being resolved, hence the allocation of H72 should not be included in the Emerging Plan at this stage.

Although the Inspectors called for additional information, very little, if any, that was not communicated at the Examination, has been provided.

ECNF have raised the issue of traffic chaos affecting all the residents and other road users and the safety issues relating to the lack of drop-off or pick-up facilities. This problem will be exacerbated with an increase of 81% in pupil numbers. Who will take the responsibility for the lives of the pupils and the people who collect them?

iii "Undertake a Green Belt assessment for the option of the Edenfield School extension – clarify exceptional circumstances".

An assessment is set out at Appendix 2 to RBC's paper, but only in the form of a draft report prepared over a year ago, in January 2020.

RBC advise that Exceptional Circumstances for the expansion of Edenfield C of E Primary School are discussed in Action Point 8.008.11 but as this has not been published at this point we cannot comment on it. We will however comment under A.P. 8.008.11 in due course.

It is unconscionable to take Green Belt for building houses and then to say more Green Belt land must be taken to accommodate a school's expansion. In the event that site H72 were approved for development, any additional educational facility required should be provided within its bounds.

iv "Note to confirm if the Green Belt assessment of the whole site allocation would differ from the assessment of the 3 parcels that has been carried out in the study"

Please note: paragraph numbers in this section refer to those in RBC's paper.

The assessment set out at Appendix 2 to RBC's paper is only in the form of a draft report prepared over a year ago, in January 2020.

'4.4.1 LUC's Assessment is attached as an Appendix. It concludes ".....all of the H72 site has boundaries which would prevent any significant impact on the wider Green Belt and hence the release of the Allocation as whole will not lead to any greater increase in harm than that identified in the original 2016 Green Belt assessment."

The original landscape assessment was carried out by Penny Bennett Landscape Architects in 2015 and then again in 2017 and on both occasions they concluded that the greater part of Area A (Parcel

43) was “not suitable for development on landscape grounds”. Please refer to EL 2.066g ECNF – GBP - 4.2 for full background detail.

RBC then employed LUC to provide a further study which seems to be RBC’s *modus operandi*, in that if the consultants highlight issues that have a serious effect on the Plan they then use a different consultant.

LUC then provided RBC with the response they sought. We examined LUC’s conclusions when we were responding to Action Point 8.008.6 and found them to be seriously flawed. For full supporting evidence of this refer to our response to Action Point 8.008.6 which was submitted with the first tranche of responses in December 2020.

LUC’s assumption that development of site H72 would proceed from south to north was both groundless and irrelevant and is shown to be unjustified by the planning agents’ letter at Appendix 4 to RBC’s paper.

Even if the A56 would act as a containing influence, development of H72 would constitute major urban sprawl.

Basically here again RBC just disregard any evidence that obstructs their obsession with site H72 and plough on just as though it does not exist.

v “Note to confirm the heritage position especially regarding the issue of substantial harm and how this conclusion has been reached?”

Consider production of mitigation plan showing any areas not to be built on including set back and any impacts on site capacity”

Please note: in the absence of paragraph numbers in Appendix 3 to RBC’s paper we provide our own in this section.

1. Original comments

1.1 The original comments from RBC’s own Heritage and Conservation Officer were as follows:

H72. SHLAA 16262. Land west of Market Street Edenfield. Criteria “site contains or adjoins a listed building”.

Conclusion: “Acceptable if the site is significantly reduced, inclusive of proposed numbers and boundary shall be pulled south of Mushroom House. Highest quality materials and design will be required and standard modern construction will not be acceptable. Materials shall be natural stone, natural roofing slates and timber for doors and windows with no exceptions. The houses will be restricted to two stories on the entire site. A highly detailed landscaping plan will be essential; this will need to include strong buffering to the north of the amended boundary. Landscaping will also be required to buffer against any new roads of access which is created.”

2. Non-compliance with Inspectors' request

2.1 We would observe that what the Inspectors sought in Action 14.3(v) was an explanation of how the conclusion of substantial harm had been reached. They did not ask for a new report from a different person with a different conclusion.

2.2 The Inspectors suggested the production of a mitigation plan, but none has been provided.

2.3 It is unacceptable for RBC to produce, after the Examination Hearings, a document that contradicts their previous evidence on the basis which the Examination proceeded.

3. Status of Memorandum from Growth Lancashire

3.1 Whether this new document was written as a Heritage Impact Assessment is questionable. It takes the form of a 'Memorandum' and does not state any terms of reference. With its numerous grammatical, spelling and typing errors and informal style, it has not been produced to a standard that might be expected of a document intended for wider publication. The author's qualifications are not stated, although his Linked in profile suggests he has relevant experience. The evidence with which he says he was provided is not specified.

3.2 The Memorandum is inaccurate - site H72 was intended to, and still should, comprise three, not four, SHLAA sites. The Memorandum might have added that, according to the Policies Map, H72 includes also an area of non-SHLAA land adjacent to and south of Church Lane, although the Map is inconsistent with the corrected description of site H72 as Greenfield in Table 1 in the Plan - for details, please see pages 16/17 *infra*; it uses 'Vicarage' and 'Rectory' as if they are interchangeable, even though the 1894 Ordnance Survey 6 inches to the mile map, which the Memorandum appears to cite, correctly records the premises as 'Vicarage'.

3.3 The author of the Memorandum seems to have approached his task on the basis of deciding a planning application rather than making a Plan. This is not what is required. What needs to be assessed is the impact on heritage assets of allocating site H72 for housing in the Local Plan.

3.4 When judging the objectivity of the Memorandum and the independence of its author, it should be borne in mind that Growth Lancashire's Chairman and Managing Director is also the Chairman of a construction company which has a close working partnership with RBC. The Leader of RBC is another director of Growth Lancashire. The author's undisclosed brief might well have been to produce arguments in favour of the allocation rather than an objective assessment.

3.5 We submit that, even if the Memorandum is admitted, it should be disregarded. There is no reason to suppose that it is more authoritative than the previous HIA; indeed, in many respects, its quality is questionable.

4 Limitations of the Memorandum

4.1 Its starting point should have been the requirement of section 39(2) of the Planning and Compulsory Purchase Act 2004, as stated in NPPF, paragraph 16, namely that Plans should be prepared with the objective of contributing to the achievement of ‘sustainable development’, summarised in paragraph 7 in the words of United Nations General Assembly Resolution 42/187 as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’. Achieving sustainable development involves three overarching and interdependent objectives, economic, social and environmental. These need to be pursued in mutually supportive ways with a view to securing net gains across each. The environmental objective is ‘to contribute to protecting and enhancing our natural, built and historic environment’, NPPF, paragraph 8. Paragraph 8 receives only a superficial reference towards the end of the Memorandum.

4.2 We would observe that the allocation of site H72 will harm, rather than protect and enhance, the historic environment.

4.3 The Memorandum should then have considered the presumption in favour of sustainable development (NPPF, paragraph 11), which for plan-making means that

‘a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless (our emphasis):

i. the application of policies in this Framework that protect areas or assets of particular importance [including Green Belt and designated heritage assets] provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’

4.4 The Memorandum should then have considered whether there are any adverse impacts of allocating site H72 for housing. It should then have acknowledged, if there were such adverse impacts, that it was for the Plan-maker to consider whether they would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF taken as a whole, having regard to the significance of Edenfield Parish Church as a Grade II* listed building and to the contribution made by its setting to its significance.

4.5 ‘Setting’ and ‘significance’ are defined by NPPF Annex 2: Glossary as follows:

‘Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’

PPG, paragraph 013, adds (our emphases),

*The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although **views of or from an asset will play an important part in the assessment of impacts on setting**, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close*

proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time. When assessing any application which may affect the setting of a heritage asset, **local planning authorities may need to consider the implications of cumulative change.** They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.'

4.6 The reference in the Memorandum to the current Local Plan is irrelevant. The Memorandum should be considering an allocation in the Emerging Plan, and accordingly any contextual Plan policies to be considered are those in the latter.

5 NPPF, paragraph 185, positive strategy and the Memorandum

5.1 NPPF, paragraph 185, states (our emphases):

'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

*a) the **desirability of sustaining and enhancing the significance of heritage assets**, and putting them to viable uses consistent with their conservation;*

*b) the **wider social, cultural, economic and environmental benefits** that conservation of the historic environment can bring;*

*c) the **desirability of new development making a positive contribution to local character and distinctiveness**; and*

*d) **opportunities to draw on the contribution made by the historic environment to the character of a place.**'*

5.2 Strategic Policy ENV2: Heritage Assets of the Emerging Plan is largely concerned with development proposals. All it says about such a strategy is in the fourth and sixth bullets of the final paragraph of the Policy. RBC will, it says -

'Develop a positive strategy to safeguard the future of any heritage assets that are considered to be "at risk", and

Develop a positive heritage strategy for the Borough'

5.3 Clearly, having a policy to develop a strategy falls far short of setting out a strategy, as NPPF requires. Therefore, not only is the Plan unsound on this ground, among others, but it fails to give any guidance to a heritage impact assessor.

5.4 The Memorandum might well have confronted this deficiency but ignores it. If the Plan were to contain a positive strategy, as required by NPPF, it might have assisted the author.

5.5 We submit that the allocation of site H72 hinders, rather than furthers, the objectives of paragraph 185 emphasised above in relation to the heritage assets within and adjacent to the site. Not least, the social and cultural benefits of Edenfield Parish Church and Churchyard and setting, as mentioned at paragraph 5.8 c) below, are completely disregarded.

5.6 The Memorandum refers to NPPF, paragraph 192:

'In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.'*

5.7 There is some overlap between those criteria and paragraph 185. Even on his own limited and flawed approach, the author should have asked in the light of paragraph 192,

- a) Is it desirable to sustain and enhance the significance of Edenfield Parish Church, including its setting?
- b) How can the allocation of site H72 be made to enhance the setting of Edenfield Parish Church?
- c) What positive contribution does the conservation of Edenfield Parish Church make to a sustainable community in Edenfield?
- d) Is it desirable for any development of site H72 to make a positive contribution to local character and distinctiveness?

5.8 We submit that the answers to those questions are as follows:

- a) Yes. As a Grade II* listed building, it is obviously desirable to enhance, and not merely to sustain, its significance.
- b) by restricting the proximity of housing development within sight of the Churchyard. The original Heritage Impact Assessment recognised this by saying that there should be no development between Church Lane and the public footpath that passes Mushroom House. The Memorandum solution is to strengthen woodland to block out the view, but that harms the setting of the Church and Churchyard. (As regards H72 north of Church Lane, tree-planting might be appropriate.)
- c) The Church plays a crucial part in the sustainability of the Edenfield community, providing the opportunity for private prayer and for people to gather for collective worship, baptisms, weddings and funerals. An integral element of the ethos of Edenfield C of E Primary School is its close association with the Church. Many residents of Edenfield have friends and relatives who are buried in the churchyard, and the views south across the central section of H72 and the solitude make a very important contribution to paying respects and remembering family and friends. As the Church is bound up with the lives of so many people in so many ways, it is vitally important to sustain and enhance its setting, and certainly not to harm it.
- d) Yes, obviously that would be not only desirable but essential. Purely from the heritage aspect, a sure way of achieving this would be as stated in answer b) above. It must be remembered that part of the Church's historic interest is that it dates back to the seventeenth century, and it is therefore important to ensure that its setting is enhanced if at all possible and not to allow development that would harm its setting. A large housing estate is likely to detract from local character and distinctiveness.

5.9 To claim, as the Memorandum does, that the level of harm from close development is low and could be mitigated by clever design of the housing layout and strengthened woodland is disrespectful to the residents of Edenfield and those with friends and relatives buried in the Churchyard.

5.10 The Memorandum refers to NPPF, paragraph 200. This states (our emphases):

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

Again the reason for this reference is unclear. The allocation (it is not a case of a proposal) would do nothing to further the objectives in paragraph 200. It would not enhance or better reveal the significance of any heritage asset.

6 Basis and scope of Memorandum

6.1 Although the date of the author's site visit is stated, the time, duration and weather conditions are not. The author says he visited the site and surrounding area, but he does not say which parts - H72 itself is extensive. Did he go into the parts that are not publicly accessible? Did he take photographs? The report of a thorough assessment might be expected to include photographs to illustrate its findings and support its conclusions.

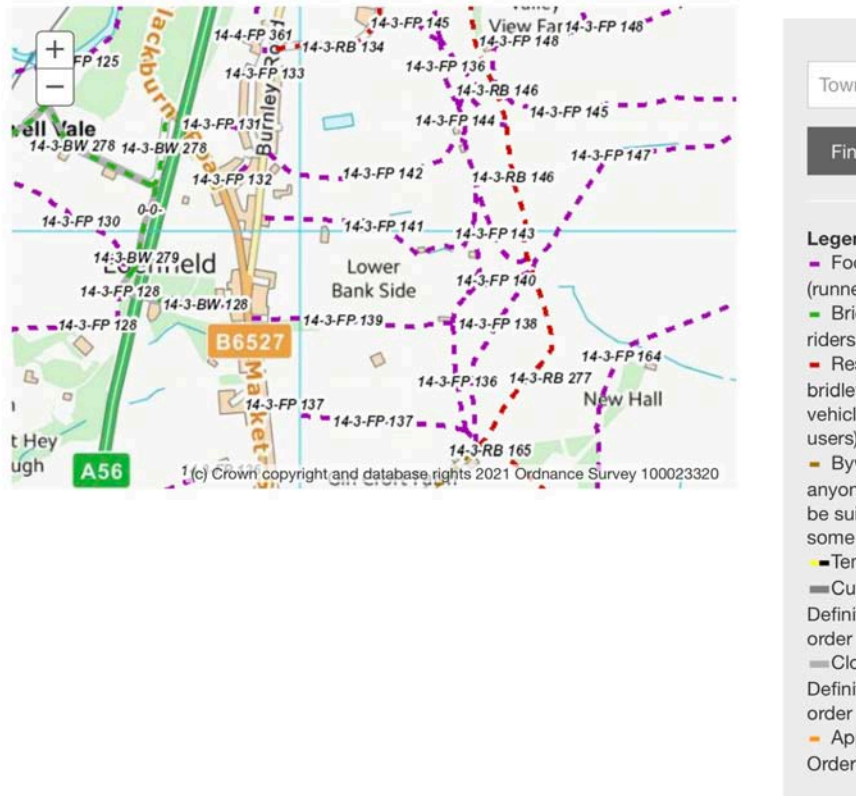
6.2 We assume, in the absence of any contrary indication, that the author did not take in views across the valley from the west towards the Church, or look down from Footpaths 136, 138, 139 and 140 and Restricted Byways 146 and 277, as marked on the map on the following page. It is doubtful whether the assessment in the Memorandum can be regarded as comprehensive.

7 Flawed and inadequate conclusions of Memorandum

7.1 It is clear from the over-simplified statement of the 'key heritage issues for the LPA to consider' on the third and fourth pages, that the Memorandum pays no regard to the requirements of NPPF, paragraph 11.

7.2 The author feels (his word) that, historically, the setting of the Church is 'somewhat confined'. That is a curious position. Historically there would have been fewer buildings in the vicinity, and accordingly the setting of the Church would most probably have been more extensive than it is today. The Memorandum then becomes confused about whether significance relates to the asset or the setting or adjacent land (*'this area makes a positive contribution to how we appreciate the Church and is of a low significance'*).

difficulties when using the public rights of way network.



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7.3 It is not clear from the Memorandum whether the author considers the current setting of the Church to be confined to his perception of its historic setting or whether he accepts the statement in PPG, paragraph 013 that *'views of or from an asset will play an important part in the assessment of impacts on setting'*.

7.4 Although it is accepted that the significance of the Church is high, due to its Grade II* listing, and although the Church and Churchyard perform a key role in the community, the Memorandum minimises the adverse impact of the allocation on the setting of the Church (*'any impact from new housing will likely to be minimal'*), not least as regards the contribution made to the setting by the views to and from the Churchyard. Indeed the Memorandum disregards the contribution of the outward views and proposes their obstruction by tree-planting, notwithstanding that this would block inward views too.

7.5 Historic England draw attention to the limitations of screening (Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) *The Setting of Heritage Assets*, paragraph 40) (our emphasis):

*'Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. **Screening may have as intrusive an effect on the setting as the development it seeks to mitigate**, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the setting also requires consideration. Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection. Management measures secured by legal agreements may be helpful in securing the long-term effect of screening.'*

7.6 Historic England, *op. cit.*, paragraphs 9 and 10, offers the following guidance about setting and views:

'Setting . . . Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The following paragraphs examine some more general considerations relating to setting and significance.

Change over time

Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

. . .

Access and setting

Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

Views and setting

The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.'

7.7 The Memorandum claims,

'Using the ICOMOS assessment methodology matrix I find the level of impact to the setting of Edenfield Parish Church to be in the very low/negligible. sic The level of harm will need to be assessed as being 'less than substantial' under P.196 of the NPPF.'

No reference for the matrix is supplied. Possibly it is the same as Appendices 3A and 3B to ICOMOS draft Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, May 2010 http://openarchive.icomos.org/id/eprint/266/1/ICOMOS_Heritage_Impact_Assessment_2010.pdf or the Table on page 9 thereof. On an application of those Appendices, the Church is a 'high' value heritage asset, and change to its setting such that it were significantly modified, noticeably changed or hardly affected would constitute respectively moderate, minor or negligible impact. According to the Table the significance of such impacts would respectively be moderate/large, moderate/slight or slight.

7.8 We submit that, in that categorisation, by the development of site H72 for housing the setting of the Church would at the least be noticeably changed, if not significantly modified. Accordingly the impact would be minor, if not moderate, and the significance of the impact would be moderate/slight, if not moderate/large. We do not accept that the impact would be very low/negligible.

7.9 The ICOMOS document does not use the word 'substantial', and NPPF, paragraph 196 seems to refer to determining applications rather than plan-making. Accordingly, the statement "*The level of harm will need to be assessed as being 'less than substantial' under P.196 of the NPPF*" should be disregarded.

7.10 Contrary to advice in PPG, paragraph 013, *supra*, and from ICOMOS, *ibid*, para 5-7 and Historic England, *op. cit.*, paragraph 9 and page 12, the Memorandum fails to consider cumulative impact in the context of the modern housing development at Church Court, off Church Lane opposite the Church. Historic England, *op. cit.*, paragraph 9 advises,

'Cumulative change

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).'

8 Control of design of development

8.1 The heritage impact assessment in RBC's evidence is rightly prescriptive about the type of housing that might be allowed. As noted in paragraph 1.1 of this section it specified *inter alia*:

"... standard modern construction will not be acceptable. Materials shall be natural stone, natural roofing slates and timber for doors and windows with no exceptions. The houses will be restricted to two stories on the entire site..."

It added that a highly detailed landscaping plan would be essential. In contrast, the Memorandum is completely silent on these crucial topics, except for a meaningless reference to 'clever design', underlining its inadequacy and superficiality.

9 Conclusions

9.1 As regards impact on the setting of the Church, the Memorandum states:

'I feel this level of harm could be mitigated by;

- Carefully planning the layout of the housing parcels to allow those glimpsed views to continue i.e. by aligning the principle road(s) along a north-south or north east – south west axis.*
- The strategic positioning of POS along the sensitive woodland area south of the brook/Church enclosure.*
- Augmenting the existing tree planting in the woodland areas.'*

9.2 The Memorandum concludes

'On the evidence provided and from my own site visit I conclude that the housing allocation will cause only a very low level of harm to contribution made by the setting to Edenfield Parish Church. This only affects the area immediately south of the wooded enclosure to the Church and grave yard. As indicated above I think this level of harm could be mitigated by clever design of the housing layout.'

9.3 Having previously submitted in evidence a Heritage Impact Assessment pointing out substantial harm to the setting of the Parish Church, RBC have now seen fit to tender a document that, wrongly in our submission, takes a completely different view. RBC seem content also to let the Memorandum speak for itself, as they make no comment on it and do not attempt to explain the change of approach, save to quote at paragraph 4.5.1 of their paper the vacuous passage reproduced at paragraph 9.2 above.

9.4 We submit, for all the reasons above, that the passages quoted at paragraphs 9.1 and 9.2 above are ill-founded, as they are based on a flawed approach and inadequate exploration of the site and an inadequate appraisal and understanding of the relevant issues. The suggested mitigation - 'clever design' - is simplistic at best.

vi “Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners.”

We would make two observations:

1. The agents’ letter (Appendix 4 to RBC’s paper) does not address the implications of LCC’s comments about access to/from the southernmost parcel of site H72, which effectively refute claims that each sector can be accessed separately.
2. Whilst the Inspectors did not specifically request an update, Highways England require a comprehensive site investigation survey incorporating borehole surveys. We have highlighted on several occasions that a significant part of Parcel 43 consists of a man-made mound from laminated clay spoil tipped over existing laminated clay which is considered to be generally unsuitable for development. This land was already proved to have the same stability seam issues as the Lindon Park Development site in Ewood Bridge, and RBC have reduced the number of dwellings proposed on that site from 187 to 50 despite that site’s not having laminated clay on laminated clay. This needs to be resolved before any further consideration is given to allocating site H72.

(vii) While considering site H72 we take this opportunity to draw attention to discrepancies between Table 1 and the Policies Map

1. The description of site H72 in Table 1 in Policy HS2 was rightly amended to ‘Greenfield’ from ‘Mixed but largely greenfield’ (SD024), because it was accepted that it did not include the ‘Horse & Jockey’ site. Regrettably, the Policies Map was not corrected.
2. H72 was always understood to comprise three SHLAA references: 16256 (net developable area 2.09ha, yield 63), 16262 (9.12ha, 273) and 16263 (2.32ha, 70), giving a total net developable area of 13.53ha (yield 406, rounded to 400).
3. The SHLAA 16262 [EB 004 Appendix E - Sites Assessment (2018), page 648] boundary follows the field boundary seen on the map of GB(Major)9 (EL1.002dd(i), page 36) so as to exclude the house called Alderwood and the former Vicarage. The SHLAA included Mushroom House within its ‘red edge’ and noted that the site’s development area was reduced by “dwelling house, private garden (0.34ha)” (presumably Mushroom House).
4. The H&J site is SHLAA 16358. It has yielded ten dwellings, since 1st April 2019, and should be a separate allocation in Table 1 in Policy HS2 of the Local Plan. Clearly, those ten are in addition to the 406 from the other three SHLAAs.
5. Some of these issues were explored in Richard Lester’s response to MIQs Matter 8 (EL2.064e). Please note that references therein to SHLAA 162672 should be to SHLAA 16262.
6. A complication arises from the way the Policies Map has been drawn. It shows Alderwood, the old Vicarage, and other land outside SHLAA 16262, as included in H72 and washed over in orange. In

contrast Mushroom House is excluded from the orange wash. This demonstrates inconsistency of treatment of the properties.

7. It means also that the description of H72 as greenfield is inconsistent with the Map, which, whilst it excludes Mushroom House, covers the old Vicarage, Alderwood etc, which are self-evidently previously developed land.
8. The foregoing does not detract from the crucial point that the H&J site is and must be treated as separate from H72. The history of the SHLAAs and the total yield of 406 from the three component sites rounded to 400, together with the correction to H72 in Table 1 (document SD024), whereby RBC accepted the truth of the matter, confirm that this is the case.
9. H72 was and is a Greenfield site. It is not 'Mixed' or 'Mixed but mainly Greenfield'. Accordingly, the Policies Map requires correction so as to omit the H&J site and the other land outside the three SHLAAs. It would not be appropriate to amend Table 1 again to make it conform with an incorrect map.
10. We stress that we maintain our objection in the strongest terms to the allocation of H72. Our concern is that the Plan documentation needs to be presented consistently and accurately, and we regret that it is necessary to point out these examples of how RBC have failed in this regard.

(viii) We also take the opportunity to summarise why the allocation of H72 should be deleted:

- **Green Belt:** No evidence of exceptional circumstances. No justification for taking any Green Belt when other sources have not been exhausted. Please refer to our Responses to Actions 8.008.06, 8.008.07 and 8.008.12.
- **Landscape:** Described as "not suitable for development on landscape grounds" by RBC's Landscape Architects. LUC submissions are seriously flawed as highlighted in our response to Action 8.008.6.
- **Culture and Heritage:** Harm to setting of Grade II* listed Edenfield Parish Church.
- **Character:** Disproportionate proposed growth for Edenfield, close to 50% compared with 10% for the Borough as a whole.
- **Gateway to Borough:** Located at the main southern gateway to the Borough and unspoilt by development, the site contributes to extensive views eastwards from the A56 and strengthens the impression of Rossendale as an attractive place in which to live and work.
- **Transport:** Access to B6527 Market Street/Blackburn Road remains unresolved. LCC might not allow separate access to parcel 44 (near Chatterton Hey)
- **Education:** School expansion remains unresolved.
- **Infrastructure:** Insufficient, as shown in submissions by SK Transport Planning Limited
- **Human Health:** Significant issues, highlighted in our response to Action 8.001.3 on page 14, particularly -

Virtually all of H72 is within 200 metres of the busy A56, part of the Strategic Road Network. Residents would be exposed to road transport-associated noise, and air and light pollution. This would have a minor negative impact on their long-term health.

Site H72 is more than the sustainable distance from A&E hospitals and GP surgeries and is therefore regarded as having a major negative impact on human health.

- **Geotechnical issues:** Parcel 43 includes large area of laminated clay tipped on laminated clay.

Action 14.4 H73 Edenwood Mill, Edenfield

We support this development on the basis that it makes use of the site of a derelict mill.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

SK TRANSPORT PLANNING

TRAFFIC TRANSPORT HIGHWAYS



Rossendale Borough Council
Room 120
The Business Centre
Futures Park
Bacup

25 February 2021

Dear Sir/Madam,

RE: ECNF Traffic and Transport Comments on RBC's Response to Action Point 8.0 14.3

We are writing to you again on behalf of the Edenfield Community Neighbourhood Forum (ECNF), following the publication of the Council's Schedule of Actions (Point 8.0 14.3) Housing Site Allocations: Edenfield, Helmshore, Irwell Vale and Ewood Bridge. For ease of reference a copy of this paper is provided in **appendix a**.

You will recall we appeared at the Local Plan Examination and listened carefully to both Rossendale Borough Council's (RBC) position, Lancashire County Council's (LCC) position and that of the promoters of the various housing sites in the village on traffic and transport matters.

We feel it is fair to state that the Inspector was left in somewhat of a state of 'limbo' with regard to both the Local Planning Authority's and Local Highway Authority's position on the sites, demonstrated by the volume of additional questions and information that the Inspector requested on the proposed housing site allocations. From all parties perspective the level of additional information requested on fundamental technical matters does not inspire confidence that the Draft Local Plan has been assembled in a robust and accurate way.

You will recall the extensive level of technical information that was submitted on behalf of the ECNF in the summer of 2019. These submissions are presented again for information in **appendix b**, along with commentary on LCC's and RBC's latest position as set out in the response in **appendix a**. We have responded to each traffic and transport technical matter in turn, set out under **Action Point 14.3**.

Access Matters relating to the "Central Site" (Market Street)

With regard to traffic and transport matters the Action Point states that LCC are to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3." The Highway Authority has responded on the 8th July 2020, stating:

"The central site will be accessed directly from Market Street through the field opposite nos. 88 – 116 Market Street. Although there are no underlying issues (our emphasis) with an access formed within this area, the precise position will need to be fully assessed taking account of the available sight lines, existing parking demand etc."

These latest comments are very concerning and indicate, yet again, that LCC and RBC have either not fully reviewed the baseline traffic data presented to them by their own consultants, appropriately reviewed the required site access arrangements on Market Street themselves or reviewed and fully understood the technical information that was presented by ourselves, on behalf of the ECNF in our Local Plan submissions. Returning to our submissions we encourage you to read again paragraphs 2.68 through to 2.82, which confirms:

- the circa 8,000 vehicle movements/day that Market Street accommodated in non-COVID times

- the development would be expected to generate in excess of 1,000 new vehicle movements through this access on a typical weekday
- that a Ghosted Right Turn (GRT) junction would need to be provided in this location, to accommodate the existing and predicted traffic flows on Market Street

The fundamental point here is neither the highway authority or the site promoter has to date produced any technical information as to how the proposed development site will be accessed in this location. It has fallen to us, on behalf of the ECNF to prepare a General Arrangement (GA) drawing showing the impacts of the delivering this access in this location (appendix d of our Local Plan submissions). In a location where there are known to be physical constraints when larger vehicles meet, such as bus services, this section of the highway network already experiences issues with congestion and delay, which should be considered as part of any site access strategy.

The drawing confirms that to retain the on-street parking on the eastern side of the carriageway in front of the existing terraced properties the carriageway of Market Street would need to be realigned westwards to deliver the GRT junction. In addition all the existing parking on the western side of the carriageway would need to be removed, and the junction design would necessitate the acquisition of at least two of the terraced residential properties on the western side of Market Street.

The group is also not aware of any technical modelling that will demonstrate that a GRT junction, or any other alternative junction layout will operate satisfactorily in this location. This is not a challenging task for the LCC or RBC to undertake, and it should not fall to the ECNF to have to undertake this assessment work on the site promoter or the highway authority's behalf.

We also have concerns regarding the change in vehicular access strategy to the southern and central areas of the site that have now emerged since the Local Plan Examination took place. Further commentary on this matter is provided later in this submission.

We reiterate these are fundamental design issues that have a material bearing on the ability to safely access this site on foot, by cycle and by vehicular traffic. Matters such as the loss of on-street parking, impacts on bus stops and a lack of consideration as to the impacts on parking associated with the school and church have not been commented on. With the proposals for the school to expand by 81% the existing on-street parking demand at the start and end of the school day will materially increase, but on-street kerbside parking will significantly reduce.

Based on the above technical points can LCC or RBC confirm that they have considered all the impacts of all these planning matters. From the limited information provided by the Highway Authority in July 2020 the group remain of the opinion that both authorities have failed to present a detailed response or assessment to demonstrate how they consider the site can be safely accessed. We reiterate it is 18 months since the ECNF's evidence was submitted to the Planning Inspector, and still no detailed response has been provided.

In pre-empting the expected response from yourself whilst we accept that it is not RBC's responsibility to undertake detailed design or assessment work, it is RBC's responsibility to undertake a comprehensive and thorough review before confirming support for a potential development allocation. In this instance it is the ECNF's view that neither the site promoter or RBC has adequately demonstrated how this site can be safely accessed and the impacts of delivering a new junction in this location can be appropriately mitigated. If RBC are in receipt of their own technical assessment or junction design we would be grateful if this could be passed on to the group for review please.

As a footnote from the wording on this action point we have very limited confidence that this work has been undertaken by the highway authority before preparing their response on the 8th July 2020, as if they had completed this work they would know where the optimum location would be to site the access, and the impacts on the "available sight lines" and "existing parking demand".

Based on the above information produced to in the response to Action Point 14.3 the ECNF consider LCC and RBC have yet to fully demonstrate that it has appropriately assessed the impacts of serving this development from a new access onto Market Street, and until this information is provided it is premature of RBC to offer this site up as a deliverable residential housing allocation.

Access Matters relating to the “North of Church Lane” Site

Under Action point 14.3 the Council’s statement confirms the following:

“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).

We refer you again to our technical submissions presented to the Planning Inspector in August 2019, 18 months ago. Paragraphs 2.63 to 2.67 provide a summary of the issues in delivering a new access in this location onto Blackburn Road, which includes any new access arrangement requiring on-street parking to be permanently removed, and visibility splays would need to cross the adjacent field and stone wall, as set out in paragraph 2.66.

Our 2019 submissions also highlighted the level of existing on-street parking on this section of adopted highway generated by the local school. We remind both LCC and RBC that this parking demand is 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 with the proposed 81% increase in school capacity it is reasonable to assume that parking demand may also increase in this locality, close to the existing signalised junction.

Based on the comments provided by LCC in their response in July 2020, nearly a year after our technical submissions were presented to the Planning Inspector it is frustrating that the highway authority has still yet to accurately assess whether an appropriate access can be delivered in this location, and whether the matters raised to the Inspector by ECNF can be addressed. We reiterate it should not take a local, self-funded group to identify these fundamental access constraints to both the local planning and highway authorities. These checks and reviews should be undertaken by these organisations as part of their site assessment reviews in advance of them being included as sites suitable to meet the local authority’s housing needs.

Access Matters relating to the Southern Site (Exchange Street)

LCC and RBC will recall that in their submissions ECNF raised significant concerns relating to the site promoter’s proposals to access the southern development parcel of the Market Street site via Exchange Street. It is noted that the highway authority has now reported that *“there are a number of issues with the use of Exchange Street” as a development access route.*

Their comments are as follows:

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.

It is noted that the highway authority is now suggesting that the southern area of the development site is accessed through the estate to connect to the access formed from Market Street, with only pedestrian and cycle links to Exchange Street.

Whilst there is some level of encouragement that LCC and RBC have noted the comments made by ECNF on the unsuitable nature of Exchange Street, the question remains as to why this was not appropriately reviewed and commented on at the 2019 Local Plan Examination.

In addition, to not have noted the fundamental issues with the parked vehicles on this section of the adopted highway, the deficient visibility at the Exchange Street/Market Street junction and the lack of continuous

footways does bring into question the accuracy and validity of any of the comments from RBC and LCC on the access strategies for the sites. We hope that RBC, in their response to this letter will apply the same level of diligence in their responses to the other highway and access matters.

We also raise the question that now the highway authority has accepted that Exchange Street is unsuitable as an access route to the proposed residential site, what measures or restrictions do they propose to implement to stop this section of the adopted highway being used by end occupiers of the proposed development?

Can LCC comment please as to how the use of this section of the adopted highway will be controlled and assuming that there will be some kind of road closure or restricted access on Exchange Street what technical modelling work has been undertaken to assess the impacts of development traffic and existing traffic reassigning to other local streets and the impacts of this.

We are not clear at all as to how the southern parcel of site H72 could be restricted from using the eastern section of Exchange Street or the western section of Exchange Street, Highfield Road, Eden Avenue and The Drive. It is noted this access strategy amendment is a fundamental change of position by LCC and RBC on this particular access matter. Can the Council provide further information as to their revised access strategy in this location, and explain what physical restrictions, diversions and junction design would be required to facilitate safe and appropriate access for the proposed development and existing residents living on Exchange Street, Highfield Road, Eden Avenue and The Drive.

The issue of this alternative routing of traffic, which would effectively mean existing and new residents would use the aforementioned residential streets to avoid delays at the pedestrian crossing and Rochdale Road/Market Street/Bury Road mini-roundabout junction, and the Bury Road/Bolton Road North priority junction has not been assessed. The impact of this additional traffic on the residential streets is required before LCC and RBC can reasonably conclude an appropriate quantum of development in the village.

Of particular concern is any additional development traffic having to divert through the existing residential development to the south of Exchange Street. Our concern is there is an expectation by LCC and RBC that these residential streets will be expected to accommodate significant levels of additional development traffic, through the closure or diversion of traffic from Exchange Street. The level of additional or reassigned traffic has yet to be quantified by the site promoter or LCC/RBC, and we are not aware of any additional technical modelling or assessment work on the impacts of traffic associated with the proposed development through this area, which of course would be required if a fundamental change to the development access strategy is proposed.

Based on the group's local knowledge of the village and the makeup of the residential streets it is assumed that all construction traffic to the Market Street and Southern sites would be prohibited from using Exchange Street, Highfield Road and Eden Avenue as these are residential streets and unsuitable for HGV material deliveries and parking for construction workers. Whilst it is accepted that if planning permission were to be granted the Council would attach a Construction Management Plan Condition, confirmation from LCC and RBC at this stage would be useful as to how they envisage construction movements to take place.

Turning to off-site junction modelling LCC and RBC will recall the significant amount of technical modelling work undertaken by the site promoters at the Rochdale Road/Market Street mini-roundabout junction, and our conclusions on this in our Local Plan submissions. Mott MacDonald, RBC's own transport consultants has 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. They went on to say that because of this position the quantum of residential development may need to be revisited. These capacity constraints were also highlighted in our technical submissions to the Planning Inspector as well as in the site promoter's transport consultant's reports.

Based on the above position, that was discussed 18 months ago we reiterate that LCC and RBC need to carefully review and assess the information that all parties have presented to the Planning Inspector on this junction capacity matter and provide comment on their solution to this technical matter. There is clearly a direct correlation with the scale of development proposed in the village and the associated traffic growth on the Market Street/Rochdale Road/Bury Road junction arms.

Based on the above technical points can LCC and RBC confirm if they have undertaken further assessment work, and if not how they have arrived at the suitability of the revised access strategy for the southern parcel of the Market Street site.

Conclusions

On behalf of ECNF we remain concerned that LCC and RBC are progressing with the potential allocation of circa 400 additional dwellings in Edenfield village, without undertaking the appropriate level of technical assessment, review and due diligence.

The comments from LCC, as highway authority provided nearly a year after the Local Plan Examination indicate that very little additional technical work has been undertaken, to confirm to the Planning Inspector with any level of confidence that these sites are deliverable from a traffic and transport perspective.

All the technical assessment work provided to the Planning Inspector and RBC from ECNF and the site promoters indicates a material level of degradation to the performance of the local highway network through the village. In addition the impacts of the material change in the access strategy since the Local Plan Examination appears to be unquantified. This is a concern, based on the Planning Inspector having requested further information on these matters 18 months ago and still not having clear, defined responses.

All parties are fully aware of the existing capacity constraints at the Rochdale Road/Market Street mini-roundabout junction, and to exacerbate this further with the proposed 400-unit quantum of residential development appears at best to be poorly thought through. The technical modelling work has been provided to RBC, and comment on this and the access strategies for the sites is still outstanding.

We feel it is absolutely imperative that the modelled impacts of the Rochdale Road/Market Street junction are revisited and fully assessed before either LCC or RBC can advise on an appropriate quantum of development that the village can accommodate. It is also relevant that due to the changes to the housing trajectory it is expected that build rates will be higher than previously estimated, meaning the capacity constraints at the mini-roundabout junction will occur earlier in the plan period. This matter must be appropriately considered before any final quantum of development is agreed.

We trust that the response to this letter from LCC and RBC will provide a full update on all technical matters, that can be provided to the Planning Inspector.

We look forward to LCC and RBC's response on the technical matters as set out in this letter by return. In the meantime if you require any further information the ECNF will be pleased to assist you on any technical matter.

Yours sincerely,


MICHAEL KITCHING

Director

Enc

Appendix A – Rossendale BC Actions 14.1 – 14.4 Note

Appendix B – SKTP August 2019 Development Access and Capacity Review

APPENDIX A

**SCHEDULE OF ACTIONS MATTER 14 (HOUSING SITE ALLOCATIONS:
EDENFIELD, HELMSHORE, IRWELL VALE AND EWOOD BRIDGE)**

ACTIONS 14.1 – 14.4

1 INTRODUCTION

- 1.1 During the Hearing Session on Matter 14 (Housing Site Allocations: Edenfield, Helmshore, Irwell Vale and Ewood Bridge), as part of the emerging Rossendale Local Plan Examination, the Inspector requested further information for a number of the housing site allocations.
- 1.2 There are several Appendices relating to these sites, and they are listed below, and follow at the end of this document.

Appendix No.	Summary	Matter Ref	Allocation Ref
1	Environment Agency comments	14.1	H70
2	Local Plan Examination: Green Belt Actions (LUC)	14.2; 14.3; 14.4	H72; H73
3	Heritage Impact Assessment, Growth Lancashire	14.3	H72
4	Letter from planning agents for H72 – 28.01.2021		H72
5	Highways Agency's comments re. slip road at Junction 0 of the M66	14.4	H73

2 ACTION 14.1

ACTION REF. NO.	ACTION
14.1	<u>H70 – Irwell Vale Mill, Irwell Vale</u> i. Add PWA Planning information on flood risk to the library ii. PWA planning to report feedback from Environment Agency about the river widening scheme – add to Library, implications for site capacity

- 2.1 The Flood Risk Study referenced by PWA Planning during the Hearing Session on Matter 14 has already been added to the Examination Library under reference [EL4.012](#).

2.2 An outline planning application (ref. 2019/0405) has been submitted for site allocation H70, proposing the re-development of the site and erection of up to 30 no. dwellings <https://publicaccess.rossendale.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PYAQ34NDK5H00> .

2.3 The Environment Agency (EA) has provided comments on the application which are included in Appendix 1 of this response. In summary, the general strategy for flood risk mitigation (i.e. some form of river channel widening) has been agreed at outline stage, and the final details of the strategy will be submitted at Reserved Matters stage, and further agreed before development starts. Full details of the planning application can be viewed on [public access](#).

3 ACTION 14.2

ACTION REF. NO	ACTION
14.2	H71 – Land east of Market Street, Edenfield: Specific Green Belt assessment to be undertaken for this site

3.1 Land Use Consultants (LUC) have undertaken a specific Green Belt assessment for this proposed allocation, please see Appendix 2. In their initial assessment (the 2016 Green Belt Study) this was assessed as part of a much larger parcel.

3.2 This latter assessment considered solely the specific proposed allocation H71. It acknowledges that the proposed allocation comprises brownfield land, used for storage purposes which ‘adversely affect the character of the Green Belt’. Furthermore not all of the allocation falls within the Green Belt. Nevertheless LUC consider that in keeping with the earlier assessment of which this land formed a part, the site makes a strong contribution to preventing sprawl of the large built-up area (Green Belt purpose 1).

3.3 The Council considers this previously developed land, of which a small part is in the Green Belt, will help to provide a defensible long-term boundary, given the current small part of uses of the land. Suitable design and sympathetic landscaping will be essential to ensure the sensitive rural/urban interface is adequately addressed. This could be set out in a Site Specific policy for this allocation. This small release will also assist in the redevelopment of an under-used brownfield site.

4 ACTION 14.3

ACTION REF. NO.	ACTION
	H72 – Land west of Market Street, Edenfield: i. Lancashire County Council to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3

14.3	<p>ii. Provision of additional information regarding education requirement in Edenfield – feasibility to expand Edenfield or Stubbins Primary Schools</p> <p>iii. Undertake a Green Belt assessment for the option of the Edenfield School extension – clarify exceptional circumstances</p> <p>iv. Note to confirm if the Green Belt assessment of the whole site allocation would differ from the assessment of the 3 parcels that has been carried out in the study</p> <p>v. Note to confirm the heritage position especially regarding the issue of substantial harm and how this conclusion has been reached?</p> <p>Consider production of mitigation plan showing any areas not to be built on including set back and any impacts on site capacity</p> <p>vi. Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners</p> <p>vii. Publish Highways England update position statement and invite comments (see EL4.010 and Responses)</p>
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i. Lancashire County Council to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3

4.1 The following comments have been made by LCC Highways (08.07.2020)

Dealing with each site individually,

*The **central site** will be accessed directly from Market Street through the field opposite nos. 88 – 116 Market Street. Although there are no underlying issues with an access formed within this area , the precise position will need to be fully assessed taking account of the available sight lines , existing parking demand etc.*

*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*

*The proposed access for the **southern site** is along the length of Exchange Street. There are a number of issues with the use of Exchange Street which are as follows.*

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.

It is therefore suggested that this area of the site is accessed through the estate to connect to the access formed from Market Street with only pedestrian and cycle links to Exchange Street

The addition of circa 400 additional dwellings in Edenfield will place additional strain on the local highway infrastructure and any development would be expected to assess this impact and suggest improvements to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rostron Arms and include measures to assist pedestrian and vulnerable road user interests.

ii. Provision of additional information regarding education requirement in Edenfield – feasibility to expand Edenfield or Stubbins Primary Schools

4.2.1 Although still to be finalised, Lancashire County Council Education Department are looking to accommodate 148 additional primary pupil places in Edenfield, as a result of this proposal. This figure is expected to be a maximum as it is based on all properties having 4-bedrooms. Also of note, the estimate considers pupil projections at the time. These pupil projections are expected to be re-run soon.

4.2.2 Lancashire County Council held initial discussions with both Edenfield CE and Stubbins Primary Schools to ascertain if it is appropriate pursuing further work relating to the feasibility to expand one of these schools to 1.5 form entry. Both schools indicated an interest although as the Education Authority makes clear “this will require a full and comprehensive statutory consultation process, which will involve representatives from the Manchester Diocese for Edenfield Church of England Primary School”.

4.2.3 An initial feasibility study has been undertaken by LCC Education for each school and is summarised below.

Edenfield

Based on Department of Education guidance, a requirement of 2,100 m² would be required from the third party owners. This would allow the additional building, potentially on the existing hard surface play area, which would require replacement. As yet a full feasibility has not been carried out which allows for a full design concept and full cost analysis to take place.

Stubbins

The situation at Stubbins CP allows the potential expansion of the existing school up to 1.5 form entry without additional land. However, after an initial site visit the varying land levels may provide challenges to link the required number of classrooms and services required. The full cost implications and site access will require considerable planning and full feasibility. LCC Education report that parts of the school operate on two levels which presents day to day operation challenges.

Feasibility Studies

Unfortunately LCC has been unable to proceed with the full feasibility study for each school due to staff being re-deployed as a result of to Covid. Nevertheless, there are certainly options available to ensure that primary school places can be accommodated within Edenfield. The County Council is fully aware of the need to accommodate this proposal and this will need to be addressed in the Masterplan work.

iii. Undertake a Green Belt assessment for the option of the Edenfield School extension – clarify exceptional circumstances

Green Belt Assessment for Edenfield School Extension

4.3.1 An assessment of the harm to the Green Belt, if this land was to be used by the School, was undertaken by Land Use Consultants, and concludes that the school expansion would not cause significant harm. This is set out in Appendix 2.

4.3.2 The assessment notes that the creation of a replacement playground within the Green Belt part of the school grounds would constitute only a limited impact on Green Belt openness, and would have little urbanising impact, given that the area is already part of school site and therefore functionality associated with the inset settlement. It is therefore considered that the proposed school extension would not lead to significant harm to the Green Belt.

4.3.3 In undertaking this assessment LUC has assumed that the existing hardstanding sports pitch, immediately to the rear of the school (which is in the Green Belt) would be partially built on, and that a replacement pitch would need to be built further east into the wider playing field. The playground is contained by inset buildings on two edges, and enclosed by dense tree cover on a third side, so the impact on the integrity of the adjacent Green Belt would be negligible.

Clarify Exceptional Circumstances

4.3.4 Edenfield School expansion is discussed in Matter 8.11 (Exceptional Circumstances) which proposes that Edenfield CE Primary School would remain in the Green Belt and any application for a school extension would be considered under very special circumstances. Para 4.3 states:

“Whilst the potential land required for this has been identified on the Policies Map, as expansion of Edenfield Primary is only an option (along with expansion of Stubbins Primary or a new school elsewhere, including within the allocation itself), the land required for this expansion was not specifically proposed for Green Belt release. Rather, it is envisaged that if any development were considered necessary in future, this would constitute “very special circumstances” and would be dealt with under the provisions of paragraph 144 of NPPF”.

4.3.5 Para 144 of the NPPF states:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

4.3.6 Furthermore, para 146 continues “Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it”. This specifically includes: (e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds).

4.3.7 As such the Council considers there is sufficient flexibility to retain this land in Green Belt and still enable the school in principle to expand as necessary, subject of course to other policies set out in the Local Plan. This likewise applies to Stubbins although the extension will be located in the Green Belt. A main modification to clarify this in Policy HS3 is proposed.

4.3.8 As such the Council is not arguing Exceptional Circumstances to release this land. Rather than releasing this land for development per se, the Council considers it necessary to protect it for possible future school expansion to support the development of the housing allocations within Edenfield, as required by LCC Education.

iv. Note to confirm if the Green Belt assessment of the whole site allocation would differ from the assessment of the 3 parcels that has been carried out in the study

4.4.1 LUC's Assessment is attached as an Appendix. It concludes
".....all of the H72 site has boundaries which would prevent any significant impact on the wider Green Belt and hence the release of the Allocation as whole will not lead to any greater increase in harm than that identified in the original 2016 Green Belt assessment."

v. Note to confirm the heritage position especially regarding the issue of substantial harm and how this conclusion has been reached? Consider production of mitigation plan showing any areas not to be built on including set back and any impacts on site capacity

4.5.1 The Heritage Impact Assessment is attached as an Appendix and concludes,
"On the evidence provided and from my own site visit I conclude that the housing allocation will cause only a very low level of harm to contribution made by the setting to Edenfield Parish Church. This only affects the area immediately south of the wooded enclosure to the Church and grave yard. As indicated above I think this level of harm could be mitigated by clever design of the housing layout".

vi. Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners

4.6.1 Please see appended letter from the agents representing the three landowners. This letter acknowledges *"that the programme has slipped due the delays to the wider Local Plan (and publication of associated evidence/ actions) and the ongoing effects of the pandemic; with the Council agreeing in Autumn 2020 to let the developers provide a draft of the brief to maintain momentum, which we have been working on over recent months"*.

4.6.2 The scope of the masterplan has been submitted to the Council for consideration alongside the agents' letter.

4.6.3 This letter expects the masterplan will progress in the coming 2-3 months, and requests submission to committee by Summer 2021 (with a new meeting schedule to be confirmed from May onwards following the local elections). Based on consultation on the Main Modifications in Summer 2021, the agents note that adoption is expected to follow in late 2021/ early 2022.

4.6.4 Based on an accelerated delivery compared to the Council's more cautious trajectory, the agents expect the site to be fully built out by 2030/31. This assumes a start date of late 2023, with a planning application lodged in summer 2022 and consent granted later that year. The Council notes that previous housing schemes constructed in Rossendale by Taylor Wimpey have been built out at more than 30 units per year and so consider this trajectory suggested by the developers as appropriate.

5 ACTION 14.4

ACTION REF. NO	ACTION
14.4	H73 – Edenwood Mill, Edenfield: i. Consider whether Highways England require specific wording for the slip road ii. Undertake a further Green Belt Assessment for the site iii. Amend boundary to include car park iv. Publish Highways England update position statement (this has now been published on the website)

Wording for Slip Road

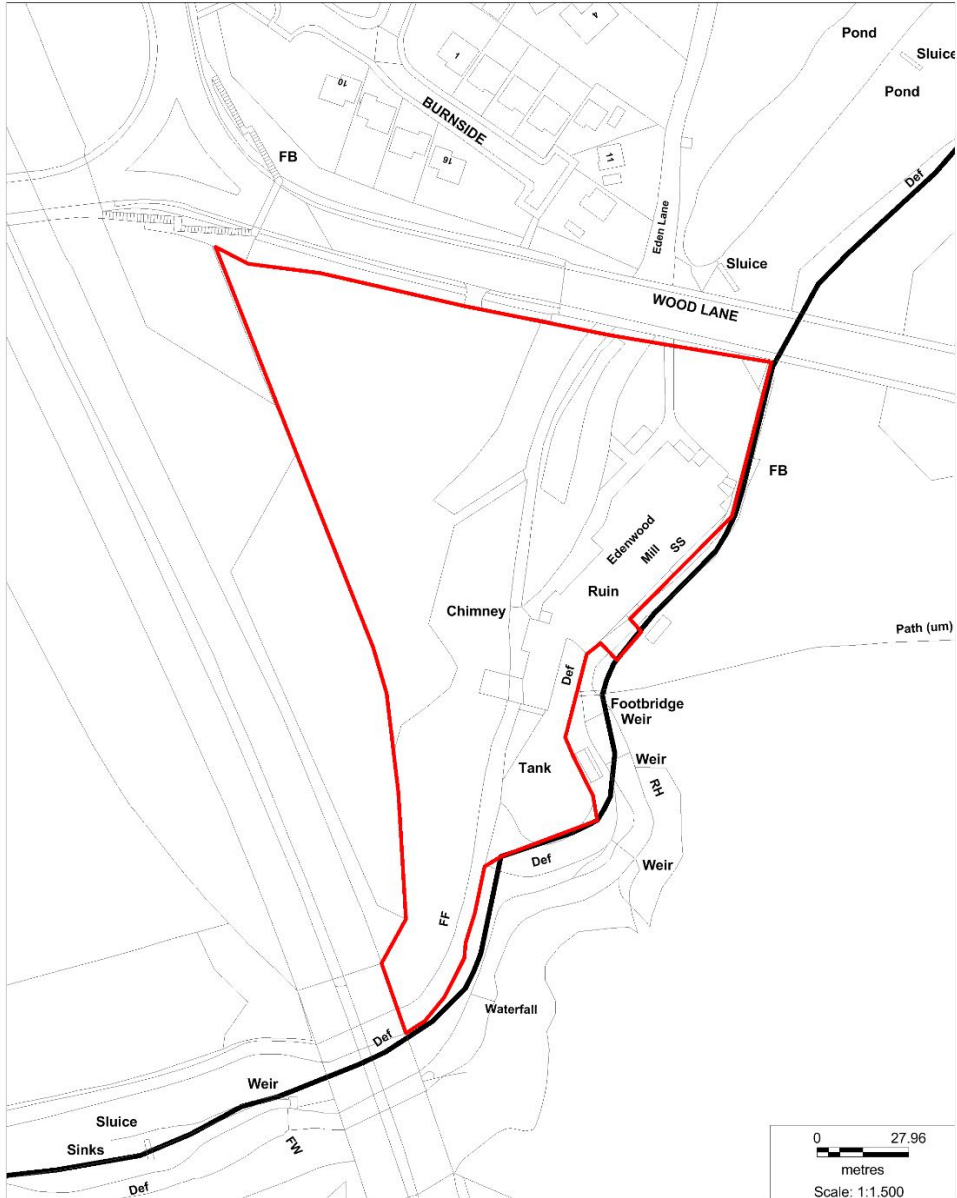
5.1 When consulted on Action 14.4, Highways England confirmed they have no aspiration to introduce south-facing slip roads to / from the M66 at Junction 'O' / Edenfield junction at present, or as a consequence of accommodating the Local Plan growth envisaged. As such, they do not specifically seek to include any wording associated with the policy for site allocation H73 to safeguard land for the purpose of a slip road. This is shown in Appendix 4.

Green Belt Assessment



5.2 Appendix 2 contains LUC's specific assessment for the allocation, given that the earlier 2016 Study assessed this as part of a wider parcel where the main concern was the narrow gap between Edenfield and Stubbins. In their assessment of just the land proposed for allocation as H73 LUC comment that the trees within the parcel are important to 'preserving perceived settlement separation'. They conclude that if the screening tree cover is preserved harm would be reduced. In respect of the derelict mill the Update notes this 'lies to the south of [the] tree belt, where Green Belt release would cause higher harm, but this could constitute the redevelopment of an existing building'.

5.3 Please see map of amended boundary below:

**H73 - EDENWOOD MILL, EDENFIELD
NEW SITE BOUNDARY (POST LOCAL PLAN HEARING)**



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Use of this data is subject to terms and conditions.

Map Key	
	Borough Boundary
	New Site Allocation Boundary



Highways England Update Position

5.4 Please refer to Examination Library Document Ref EL4.010

APPENDIX B

SK TRANSPORT PLANNING

TRAFFIC TRANSPORT HIGHWAYS



DEVELOPMENT ACCESS & CAPACITY REVIEW

Date: 27th August 2019

Project: Rossendale Local Plan – Edenfield Capacity Study

1. Introduction

- 1.1 This Development Access and Capacity Review (DACR) has been prepared on behalf of the Edenfield Community Neighbourhood Forum (ECNF). The group has appointed SK Transport Planning (SKTP) to consider Rossendale Council's plan to allocate land in the village for 456 new dwellings.
- 1.2 By way of background Rossendale Council is currently preparing its Local Plan for the period 2019 to 2034. This document will be the key planning document for both the Council and developers to reference and guide decision-making on the appropriate use and type of development on land within the Borough.
- 1.3 The preparation of the Local Plan is led by a structured evidence base, and as part of that evidence base consideration has to be given to traffic and transport matters. Local authorities, when reviewing or preparing their evidence base must give due regard to technical matters, and the findings will ensure that both the Council and site promoters have clarity that the sites are deliverable and accessible, and that the traffic and transport impacts of the development have been assessed and any required mitigation measures identified at an early stage.
- 1.4 This technical assessment work will also guide the scale of development in particular locations, and also confirm that any proposed site allocations can be appropriately accessed and are deliverable within the plan period.
- 1.5 For ease of reference the development scale proposed by Rossendale Council across the Borough is summarised in the Council's Highway Capacity Study produced by Mott Macdonald. The report states:
 - 3,180 new dwellings, of which 1,240 are proposed within the first five years of the plan period to 2024 and the remaining 1,940 dwellings proposed for the period 2024 to 2034
 - 20.53 (19.95 new and 0.58 on an existing site) Hectares Gross Area for employment (B1, B2, B8), and A further 3.08 hectares of land for mixed use sites.
- 1.6 At the time of writing the Council is proposing that Edenfield accommodates 456 new residential dwellings, an increase of 46.8% over the current 974 residential dwellings in the village.
- 1.7 SKTP, on behalf of the ECNF has undertaken a review of the Council's supporting traffic and transport data prepared by Mott McDonald in October 2018, as well as the promotional material submitted by the site promoters in October 2018.
- 1.8 The review has also incorporated a number of site visits to the village, to consider the proposed pedestrian, cycle and vehicular accesses to the development sites. The ECNF has also commissioned independent traffic surveys at the following locations in the village:
 - Market Street (the B6527)
 - the Blackburn Road/Burnley Road signalised junction
 - the Market Street/Rochdale Road/Bury Road mini-roundabout junction
- 1.9 This document provides a concise review of the Council's allocation proposals and considers both the potential impact of the proposed development and the proposed access strategies to the development sites in detail. The document provides technical evidence on traffic and transport matters which have not been presented to the Council to date in either their own Consultant's assessment or in supporting documentation presented by site promoters.

- 1.10 This report identifies a number of fundamental issues which have not been considered to date as part of the site evaluation exercise. These technical matters will be presented and discussed at the forthcoming Local Plan Examination by a representative of the ECNF.

2. Technical Evidence

- 2.1 The ECNF has supplied SKTP with a number of technical reports to review and comment on as part of this commission. These include:
- a Mott MacDonald Technical Note dated 12/01/18 summarising their technical appointment and Highway Capacity Analysis (HCA) across the Borough
 - the Rossendale Local Plan Highway Capacity Study (prepared by Mott Macdonald) dated 01/08/18)
 - three Highways England letters (two dated 04/10/18 and a third dated 25/01/18) all providing materially different comments on the Pre-Submission of the Local Plan
 - the Rossendale Draft Local Plan Regulation 19 Consultation containing “Additional Comments and Information Received from Respondents of the Consultation”
- 2.2 A summary of these reports is provided below.

The Mott MacDonald Reports

- 2.3 Mott MacDonald (MM) has been appointed by Rossendale Council to undertake a Highways Capacity Study in relation to the Rossendale Local Plan. The 12/01/18 Technical Note (TN) confirms that this assessment work *“has been undertaken to inform both the allocations process and to provide appropriate commitment to the formal Duty to Cooperate process.”*
- 2.4 The TN confirms that the assessment work has prepared operational analysis for a number of key junctions in the Borough for the following assessment years:
- 2019 Baseline
 - 2024 Reference Case
 - 2024 Local Plan
 - 2034 Reference Case
 - 2034 Local Plan
- 2.5 The 2019 assessment year is the assumed year for adoption of the Local Plan, the 2024 year are the 5-year build out within the plan and the 2034 year represents the ultimate life of the plan. The TN confirms that the assessment work has been prepared using 2017 traffic flow data sourced from Lancashire Council (LCC) and then the use of TEMPRO growth factors, committed development traffic volumes and housing/employment traffic volumes. The distribution of traffic has been based on 2011 Census Journey to Work data and GIS fastest route analysis.
- 2.6 With regard to Edenfield the TN confirms that the only two junctions assessed as part of this study have been the A56/M66 junction and the Rochdale Road/Market Street roundabout in Edenfield. No other junctions or links have been assessed within the village as part of this technical assessment work.
- 2.7 The TN provides a brief summary of the operational assessments. For ease of reference we have provided the summaries for the two junctions below.

The A56/M66 Junction

“Junction 10 has been assess (sic) using the Arcady software.

There are no noted operational issues at this junction in either the 2019, 2024 or 2034 assessment years and scenarios.

It is considered that this junction can accommodate the build out of the Local Plan up to 2034.”

- 2.8 Based on this summary the MM TN concludes that there will be no operational or capacity issues in any of the assessment years and scenarios, and that the junction can accommodate the build out of the Local Plan up to 2034.

Rochdale Road/Market Street Roundabout, Edenfield

“Junction 11 has been assess (sic) using the Arcady software.

There are no significant operational issues experienced at this junction at either 2019 or 2024, in both the Reference Case and Local Plan scenarios. As such, it is considered that this junction can accommodate the build out of the Local Plan up to 2024.

At 2034 there is a noted worsening of performance in the morning peak at the Local Plan scenario when compared to the Reference Case. (our emphasis)

It is considered therefore that discussion with LCC should take place as to whether an intervention is required at this junction due to the Local Plan build out to 2034. It should be noted however that the existing configuration of the junction and the general nature of the surrounding built up area, may prohibit the development of a scheme within the existing highway boundary.” (our emphasis)

- 2.9 The MM response is clear in that at the mini-roundabout junction in the 2034 assessment there is a noticeable worsening of the junction performance when compared to the reference case. The Council’s own consultant confirms that potential mitigation measures to enhance capacity at this location are limited by the junction configuration and surrounding third party land.
- 2.10 This position is reinforced in MM’s assessment summary table in the report (table 3 – page 7), which confirms that this junction can accommodate development traffic in the first five years of the plan, but cannot accommodate the full fifteen years of traffic associated with the plan. The table does not confirm if further analysis of this junction is required, but it does state that the views of LCC (as highway authority) should be sought regarding this identified issue.
- 2.11 Turning to the MM Rossendale Local Plan Highway Capacity Study (October 2018) this document provides a more comprehensive appraisal of the impacts of the proposed residential allocation in the village. As with the previously reviewed technical note this report concentrates on an assessment of junction capacity, and give limited weight or assessment to the impacts of additional traffic within the village.
- 2.12 As an example whilst the report does provide a brief summary of collision records, this only focuses on the junctions identified in the initial MM TN, and does not include any assessment of collision rates at the proposed development site access locations.
- 2.13 In addition the report very much focuses on the impacts, in capacity terms at a single junction of the traffic associated with the proposed allocations being brought forward. There is no assessment within the report on the expected development access proposals, suitability of existing highway links to accommodate additional traffic and compliance with industry-standard design guidance to achieve safe and appropriate access for all modes of travel. This is considered to be a major omission in the site appraisal process. Further commentary on these technical matters is provided later in this report.
- 2.14 Returning to the MM report the summary of the ARCADY model outputs for the assessment years presented in paragraph 2.4 are presented in **table 2.1** for ease of reference. The modelling results confirm:
- in the 2019 AM and PM peak Base, 2024 Reference Case and 2024 Local Plan assessments the junction is predicted to operate within accepted Ratios of Flow to Capacity (RFC) and with limited queuing on all approach arms
 - in the 2034 Reference Case assessments the junction performance is comparable, and not materially worse than the 2024 Reference Case
 - in the 2034 Local Plan AM and PM peak assessments the MM modelling confirms a significant and material degradation of junction performance

- in the 2034 AM peak the modelling confirms that on the Rochdale Road the RFC value is in excess of 1 and that predicted queue lengths will increase from 4.49 vehicles (30 metres) to 26.9 vehicles (162 metres).
- In the 2034 PM peak on the Bury Road (south) arm the RFC value increases from 0.89 to 1.13 between the Reference Case and Local Plan assessment and estimated queue lengths will increase from 6.95 vehicles (42 metres) to in excess of 375m.

2.15 As confirmed in the MM TN (dated 12/01/18) this junction is predicted to operate well in excess of accepted capacity thresholds in the 2034 Local Plan assessment years, with no clear and identifiable way of enhancing the capacity or mitigating the development impact at this roundabout junction. The MM Highway Capacity Study states on page 68 that:

“The 2034 analysis results show a notable difference between the Reference Case and Local Plan scenario results for the Rochdale Road arms in the morning peak and the Bury Road South arm in the evening peak.”

Table 31. Junction 11 Rochdale Road / Market Street Edenfield Morning Peak Results

Lane Description	2019 Base			2024 Ref Case			2024 Local Plan			2034 Ref Case			2034 Local Plan		
	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS
Bury Rd North	1.85	0.65	B	1.93	0.66	B	2.31	0.7	B	2.34	0.71	B	9.09	0.92	E
Rochdale Rd	3.02	0.76	C	3.32	0.78	C	3.74	0.8	C	4.49	0.83	C	26.9	1.04	F
Bury Rd South	0.92	0.48	A	0.97	0.5	A	1.04	0.51	A	1.09	0.52	A	2.67	0.73	C

Table 32. Junction 11 Rochdale Road / Market Street Edenfield Evening Peak Results

Lane Description	2019 Base			2024 Ref Case			2024 Local Plan			2034 Ref Case			2034 Local Plan		
	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS
Bury Rd North	0.5	0.34	A	0.53	0.35	A	0.59	0.37	A	0.58	0.37	A	1.51	0.6	A
Rochdale Rd	1.63	0.62	A	1.69	0.63	A	1.82	0.65	B	1.93	0.66	B	3.72	0.8	C
Bury Rd South	4.61	0.83	C	4.87	0.84	D	6.73	0.88	D	6.95	0.89	E	62.5	1.13	F

Table 2.1: Mott MacDonald October 2018 Rochdale Road/Market Street ARCADY Results

2.16 Having identified this junction capacity issue the MM report then attempts to play down the impacts in the 2034 Local Plan assessments, by stating that the distribution of traffic to and from the proposed allocation sites, which predominantly fall to the north of the roundabout will mean that development traffic will not need to route through this roundabout junction. In addition, the MM report attempts to place weight on a highway scheme in Bury that would provide a southern bypass to Edenfield. The report confirms this this scheme has no highway status, but if implemented would:

“likely provide a reduction in traffic volumes within Edenfield, thereby representing a much more efficient and sensible approach to dealing with forecast future delay within the village.”

2.17 The findings from the MM report are both contradictory and inconsistent. Geographically any traffic in the village wishing to travel either towards Rochdale, Ramsbottom, Bury or the M66 will travel southwards through the Rochdale Road/Market Street mini roundabout. The assertion that development traffic would travel north from the village either via Blackburn Road/Manchester Road to join the A56, or via Bury Road to join the Rawtenstall Gyratory to then route south onto the A56 would result in a circa 7km diversion to return back to the A56/M66 junction.

- 2.18 Based on the MM assessment work it is considered that their technical modelling appraisal is fit for purpose and the predicted impacts at the Rochdale Road/Market Street mini-roundabout junction modelling are robust and reflect expected future traffic conditions. What is not accepted is the MM conclusions that place a reliance on end occupiers of the draft site allocations undertaking significantly longer diversionary routes to avoid the junction, or a reliance on highway schemes in a neighbouring authority which has no status is considered incorrect and not an accurate representation. This position is reinforced by other assessment work undertaken by site promoters, Highways England and SKTP as part of this technical review.

Highways England Position

- 2.19 As part of the appraisal of the emerging Rossendale Local Plan Highways England (HE) has provided comments on the proposed site allocations and development impact. In their original responses dated 4th October 2018 they provided very clear and concise comments on both the suitability of the proposed residential allocation west of Market Street in Edenfield (site H72), as well as the expected access arrangements for the site.
- 2.20 With regard to accessing this development whilst HE acknowledged that masterplans would be prepared to support proposed residential allocations of more than 50 dwellings they have raised concerns that the potential allocation has:

*“the potential to significantly impact upon the safety and operation of the SRN. It is unclear what access arrangements have been considered for this housing allocation, or that appropriate mitigation measures have been identified to address any significant impact on the SRN. **As such at this stage Highways England do not consider there is robust evidence to support the inclusion of this allocation and its removal from the Green Belt.**” (HE emphasis)*

- 2.21 This position regarding development impact is confirmed in the MM technical assessment work. The modelling confirms that the development will have an impact at the only assessed junction in the 2034 Local Plan modelled period, and the impact of the Local Plan allocation will have a material and potentially severe impact on the performance of the Rochdale Road/Market Street mini roundabout junction.
- 2.22 Whilst not a traffic and transport matter HE has also formally commented that there are geotechnical issues with the development of site H72. They have stated in their 4th October 2018 response:

“...the presence of an existing land-slip beneath the site now dictates that the Council must now carry out a geotechnical assessment in order to provide a robust indication of the extent to which the allocation may be developed / contribute towards the housing target.”

- 2.23 In their subsequent letter of the 25th January 2019 HE provided an update to their 4th October 2018 letter. In their final letter HE's confirmed that their original response:

“...commented on several areas covering RBC's Highway Capacity Study, as well as viability matters linked to geotechnics and ground conditions concerning three proposed allocations. It is on this latter aspect on which we now write, specifically in respect of comments made about the housing site allocation reference 'H72' known as 'Land West of Market Street, Edenfield'.

- 2.24 Their January 2019 response provides a concise update that their concerns regarding the ground stability risks on part of the land that forms part of H72. HE has recommended that a:

“...comprehensive (and intrusive) site survey and geotechnical assessment is carried out before planning decisions affecting the development layout (and therefore quantum of development) are taken.”

- 2.25 Turning to traffic and transport matters it is noted that HE has stopped short of commenting on the impact of the development proposals on the local highway network. This is as expected as HE is responsible for the trunk road network.
- 2.26 The HE has confirmed in their January letter that the MM study does identify the need to widen the A56 to three lanes in each direction, and HE are aware this could be needed towards the early 2030's. The letter confirms HE has no proposals to take this scheme forward at this time, but would want to reserve the right to do so in the future. HE has stated in their response:

“RBC and any future developer(s) of the H72 site may wish to consider this when planning the permanent internal layout and landscaping of a ‘new’ development.”

- 2.27 In conclusion the HE's January 2019 response is carefully caveated by saying that they are “satisfied in principle” that the H72 site allocation could be development for housing without adverse impact on the A56 trunk road, provided a careful approach is taken to its planning and construction.
- 2.28 The combination of technical evidence produced by MM in their Highway Capacity Study, coupled with the HE's material concerns regarding land stabilisation within H72 brings into question whether this site is appropriate for residential development, and the scale of development proposed. To date we are not aware of any geotechnical information submitted to the Council to support the draft allocation in the emerging Local Plan.

Site Promoter Traffic and Transport Comments

- 2.29 As part of the “Additional Comments and Information Received from Respondents of the Consultation” responses from the site promoters transport consultants have been submitted. The report has been prepared by Croft Transport Planning and Design, on Behalf of Taylor Wimpey UK Limited and Methodist Church (the site promoters). For clarity the report confirms that the draft allocation (H72) will deliver a total of 400 residential units on the site, which is made up of three land parcels, known as:
- land west of Market Street
 - land off Exchange Street
 - land to the west of Blackburn Road

- 2.30 The Croft report was prepared after the issuing of the MM Highway Capacity Study and refers to the technical assessment work presented in this report. It acknowledges that the MM concluded that in the future year assessments spare capacity would exist at the M66/A56 roundabout junction.
- 2.31 However the Croft report also acknowledged the findings of the capacity constraints at the Rochdale Road/Market Street mini roundabout junction. The report states in paragraph 2.1.4:

“The Market Street/Bury Road/Rochdale Road mini-roundabout is more constrained and it was concluded within the report that intervention may be required by the end of the plan period.”

- 2.32 The Croft report confirms that the technical work within the document was prepared to review the likely impact of the proposals on the local highway network, in particular the Rochdale Road/Market Street mini roundabout junction.

- 2.33 Working through the impact appraisal there are a both a number of technical matters that are consistent with our findings and the appraisal undertaken by MM, but also some material differences that will have an effect on the overall assessment. These are summarised below.

Surveyed Flows

- 2.34 The Croft report confirms that the 2017 LCC traffic data has been used for their appraisal. As this data only included turning movements for the Rochdale Road/Market Street junction this is the only junction modelled in the site promoters appraisal. It is noted that no assessment of traffic conditions, traffic flow or detailed assessment of the development site access arrangements has been included in these representations. Further commentary on this is provided later in this report.
- 2.35 In terms of surveyed traffic flows through the Rochdale Road/Market Street junction we confirm that the 2017 LCC data, growthed to a 2019 Base year correlates well with the ECNF late June/early July 2019 survey data. We also take the opportunity to highlight that the directional flows on Market Street immediately adjacent to the proposed site access were recorded as:

- AM Peak – 352 Passenger Car Units (PCUs) northbound and 367 PCUs southbound
- PM Peak - 487 Passenger Car Units (PCUs) northbound and 268 PCUs southbound

- 2.36 The ECNF data confirms that the weekday two-way flows on Market Street in the AM and PM peak periods are 719 and 755 PCUs respectively.

TEMPRO Growth Factors & Committed Development Traffic

- 2.37 We have reviewed the Croft approach to the use of TEMPRO, and the adjustment to the household and jobs within the local area. Having reviewed the approach we agree with the suggested growth factors. With regard to the lack of inclusion of committed development flows whilst we are aware of some developments that have planning approval and/or are under construction in the village these are of a scale that would not be expected to result in a material difference to base traffic flows across the network.

Allocation Site Trip Rates and Traffic Distribution

- 2.38 The Croft report acknowledges that the residential trip rates used in the MM assessment are from a range of Transport Assessments. Whilst the Croft report does not formally challenge the MM trip rates, the report states:

“Given the myriad residential sites identified within the emerging local plan, this is considered a reasonable approach when preparing a borough wide study, but this may result (our emphasis) in an overestimate of development trips in a specific location.

As such, consideration has been given the potential trips that would occur as a result of potential residential development within Edenfield.”

- 2.39 Whilst the Croft methodology to calculate alternative trip rates is in line with the industry-standard approach, we draw caution in allowing the individual assessment of sites to materially deviate from the Council’s own recommended trip rates. To demonstrate the effect of the alternative trip rates **table 2.2** summarises the difference between the MM and Croft vehicle trip rates.

		AM Peak			PM Peak		
		Arrival	Departure	Total	Arrival	Departure	Total
MM Residential Trip Rates (from Report)		0.142	0.416	0.558	0.404	0.221	0.625
400 Units	400	57	166	223	162	88	250
		AM Peak			PM Peak		
		Arrival	Departure	Total	Arrival	Departure	Total
Croft Trip Rates		29	121	150	124	61	185
Difference between MM and Croft Trip Rates		AM Peak			PM Peak		
		Arrival	Departure	Total	Arrival	Departure	Total
	Vehicle Difference	-27.8	-45.4	-73.2	-37.6	-27.4	-65
	Percentage Changes	-48.9%	-27.3%		-23.3%	-31.0%	

Table 2.2: Comparison between Mott MacDonald and Croft Development Trip Rates

- 2.40 **Table 2.2** confirms that the application of the Croft vehicular trip rates result in a material reduction in predicted traffic flows to and from the draft allocation sites in the peak periods. The MM trip rates estimate 223 and 250 two-way vehicle movements in the AM and PM peak periods respectively, whereas the Croft trip rates estimate 150 and 185 two-way vehicle movements for the same time periods. This is a 33% reduction in development trip rates in the AM peak and a 26% reduction in the PM peak.
- 2.41 The application of these materially lower vehicular trip rates has the potential to suppress the actual impact of the proposed development on the surrounding highway network, and for this reason we consider any assessment work utilising these trip rates should be treated with a significant degree of caution.
- 2.42 For the reasons given above we consider that it is appropriate and transparent for all potential allocation sites to use agreed residential trip rates when appraising site allocations, and in line with this we recommend that the Croft “sensitivity test analysis” provides a more realistic assessment of the development impact.

Capacity Assessment

- 2.43 The Croft report presents ARCADY modelling for the 2024 Base and “with allocation” flows, as well as the 2034 Base and “with allocation” flows as a sensitivity test. When comparing the 2024 AM and PM peak base flows with the MM assessments the modelling is broadly comparable in terms of RFC values and queue lengths.
- 2.44 However, there is a material difference between the two assessments in the “with allocation” scenarios. The use of materially lower development trip rates results in the Croft assessment presents a reduced development impact in this location. Notwithstanding this the Croft assessment shows a material degradation of junction performance in the 2034 future year assessment. Their assessment confirms in the weekday AM peak that the Rochdale Road junction arm will see the max queue length increase from 10 to 23 vehicles and the max RFC increases from 0.92 to 1.00.
- 2.45 In the 2034 PM peak the impacts are more significant. In line with the MM assessment the Bury Road junction arm RFC value is predicted to increase from 0.87 to 0.99, with the maximum queues increasing from 6 to 25 vehicles. Motorists are predicted to experience an increase in delay from 34 to 121 seconds on this junction arm.
- 2.46 The Croft report summarises the above position by stating:

“The assessment indicates that the junction would only just reach capacity at 2034 following the additional of traffic associated with the draft allocation site, however, even then, increases in delay are unlikely to impact on overall journey times.

Notwithstanding the above, as set out in the MM highway capacity study, the junction performance could benefit from the formalisation of the existing uncontrolled crossing on the Bury Road North

arm of the junction (note – this crossing is on Market Place) into a demand controlled signalised crossing, if this is considered necessary by the local highway authority at the time of a planning future planning application(s).”

- 2.47 The Croft report states the modelling is “...unlikely to impact on journey times”. This is incorrect as their own modelling confirms motorists will experience a material increase in queues and time delay. In addition we question how they have arrived at the potential solution to the capacity issue being the upgrading of the uncontrolled pedestrian crossing to a controlled operation.
- 2.48 Their own modelling, which compares the “base” traffic conditions against “with allocation” flows clearly shows a material degradation in junction performance. This is in line with the MM modelling, albeit the level of congestion and delay is lower than the more robust MM assessment.
- 2.49 Based on the above assessment we disagree with the conclusions laid out in the Croft assessment, which states:

“...it can be concluded that the Market Street/Rochdale Road/Bury Road mini-roundabout can accommodate the likely levels of traffic associated with the draft allocation sites without any significant impacts on the surrounding highway network.”

- 2.50 Their own modelling, presented in tables 2.11 and 2.12 in their report clearly shows a material worsening of the junction performance in the 2034 “base” and “with allocation” flows. We are of the professional opinion that the MM conclusions regarding the performance of the Rochdale Road/Market Street mini-roundabout junction are correct. For ease of reference their comments are provided below for information.

At 2034 there is a noted worsening of performance in the morning peak at the Local Plan scenario when compared to the Reference Case. (our emphasis)

It is considered therefore that discussion with LCC should take place as to whether an intervention is required at this junction due to the Local Plan build out to 2034. It should be noted however that the existing configuration of the junction and the general nature of the surrounding built up area, may prohibit the development of a scheme within the existing highway boundary.” (our emphasis)

- 2.51 Based on the findings in both the MM and Croft reports it is evident that there is a capacity issue at an existing junction on the local highway network in the 2034 future year assessment. This brings into question the scale of development proposed for the village, and the ability of the local highway network to accommodate the traffic associated with the draft allocation.

Revised Junction Assessment

- 2.52 To validate the findings from the MM and Croft assessments we have prepared an assessment of the Rochdale Road/Market Street mini-roundabout junction using the ECNF 2019 AM and PM peak traffic flows growthed to 2024 and 2034. The junction has been modelled in JUNCTIONS 9 for the AM and PM peak periods, using the MM and Croft development trip rates presented in their respective documents.
- 2.53 The full modelling outputs are provided in **appendix a** for the MM assessments, with junction summaries presented in **tables 2.3 and 2.4**.

Arm	2024 Base Flows						2024 "With Allocation" Flows					
	Weekday AM			Weekday PM			Weekday AM			Weekday PM		
	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)
Rochdale Road	0.82	4.7	32	0.73	2.9	20	0.89	7.4	50	0.78	3.6	24
Bury Road	0.63	1.8	14	0.93	10.4	59	0.68	2.2	16	1.08	40.8	177
Market Street	0.73	2.9	21	0.45	0.9	11	0.87	6.5	41	0.52	1.2	12

Table 2.3: 2024 ECNF Traffic Flows and Mott MacDonald Development Trips (Rochdale Road/Market Street Mini-Roundabout Junction)

Arm	2034 Base Flows						2034 "With Allocation" Flows					
	Weekday AM			Weekday PM			Weekday AM			Weekday PM		
	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)
Rochdale Road	0.86	5.8	38	0.76	3.3	21	0.93	9.7	63	0.80	4.2	27
Bury Road	0.67	2.2	16	0.97	14.2	76	0.72	2.7	19	1.12	52	218
Market Street	0.77	3.5	25	0.47	1.0	11	0.91	8.6	53	0.53	1.2	12

Table 2.4: 2034 ECNF Traffic Flows and Mott MacDonald Development Trips (Rochdale Road/Market Street Mini-Roundabout Junction)

- 2.54 The modelling summaries presented above confirm that, in line with the Council’s own assessments the mini-roundabout junction is predicted to operate with RFC values in excess of 1 in the 2024 and 2034 “with allocation” assessments in the PM peak.
- 2.55 Most notably the Bury Road junction arm experiences significant increases in queuing and delay in the PM peaks, with queue lengths increasing from 14 to 52 vehicles on this junction arm. In the PM peak period the delay to motorists increases from 76 seconds to 218 seconds on this junction arm.
- 2.56 Turning to the Croft trip rate assessment **tables 2.5 and 2.6** provide a summary of the JUNCTIONS9 model outputs. The full modelling outputs are provided in **appendix b**.

Arm	2024 Base Flows						2024 "With Allocation" Flows					
	Weekday AM			Weekday PM			Weekday AM			Weekday PM		
	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)
Rochdale Road	0.82	4.7	32	0.73	2.9	20	0.87	6.3	43	0.76	3.3	22
Bury Road	0.63	1.8	14	0.93	10.4	59	0.65	2.0	15	1.02	24.4	117
Market Street	0.73	2.9	21	0.45	0.9	11	0.83	5.0	33	0.50	1.1	12

Table 2.5: 2024 ECNF Traffic Flows and Croft Development Trips (Rochdale Road/Market Street Mini-Roundabout Junction)

Arm	2034 Base Flows						2034 "With Allocation" Flows					
	Weekday AM			Weekday PM			Weekday AM			Weekday PM		
	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)	Max RFC	Max Queue	Delay (secs)
Rochdale Road	0.86	5.8	38	0.76	3.3	21	0.91	8.1	53	0.79	3.8	25
Bury Road	0.67	2.2	16	0.97	14.2	76	0.69	2.4	17	1.08	40.9	178
Market Street	0.77	3.5	25	0.47	1.0	11	0.87	6.4	41	0.51	1.1	12

Table 2.6: 2034 ECNF Traffic Flows and Croft Development Trips (Rochdale Road/Market Street Mini-Roundabout Junction)

- 2.57 The modelling summaries presented above are in line with the overall Croft modelling assessments, albeit that they predict greater queuing and delay on the Bury Road arm than the Croft assessment.
- 2.58 In summary in line with both the MM and Croft assessments is that all the modelling outputs produced by three separate organisations confirm that the traffic associated by the draft allocation in the village will have a material, and potentially severe impact at the mini-roundabout junction.
- 2.59 We recommend this matter needs careful consideration by the Council when considering the scale of residential development proposed for the village.
- 2.60 The next stage of this report considers in detail the proposed access arrangements for the draft site allocation, as presented on plan 2 in their report.

[Site Access Review](#)

- 2.61 The Randall Thorp Combined Illustrative Masterplan shows access strategies to the three draft allocation land parcels. These are:
 - a simple priority junction access from Blackburn Road to the northern land parcel
 - a simple priority junction access from Market Street to land to the west of Market Street
 - an extension of Exchange Street to connect into the southern land parcel

2.62 A review of each access strategy is provided below.

Northern Development Parcel Access Review

- 2.63 The northern development parcel is confirmed to deliver a simple priority junction onto Blackburn Road. The access will be formed onto a 30mph section of the adopted highway.
- 2.64 The site visit confirms that during term time this section of the adopted highway is regularly used for kerbside car parking associated with the nearby school. Photographic evidence of the car parking is provided in **photos 2.1 and 2.2 below**.



Photo 2.1: Looking North on Blackburn Road



Photo 2.2: Looking South on Blackburn Road

- 2.65 Any access strategy in this location would require this parking to be removed and displaced anywhere in the local area. A review of the Crashmap database confirms that there have been two recorded Personal Injury Collisions (PICs) immediately to the south of the proposed vehicular site access.
- 2.66 A General Arrangement (GA) drawing has been prepared to check that the required visibility splays at the proposed development site access can be delivered. The GA drawing confirms that the visibility splays would cross the adjacent footway and also cross the adjacent field and stone wall.
- 2.67 We recommend that as part of the assessment of the ability to deliver the site for housing the Council makes the appropriate checks to ensure this access strategy is deliverable and all land required for the access and visibility splays can be delivered by the site promoter.

Land West of Market Street Development Parcel Access Review

- 2.68 The Croft report confirms that Market Street development parcel will be accessed via a simple priority junction along the eastern site frontage. This section of Market Street has a 9m carriageway width, a 1m footway on the eastern side of the carriageway and a standard width footway on the western (site side) of the carriageway. This section of Market Street has on-street parking on both sides of the carriageway, as shown in **figures 2.3 and 2.4**.



Photo 2.3: Looking North on Market Street



Photo 2.4: Looking North on Market Street

- 2.69 As with the northern land parcel this kerbside parking on the western side of the carriageway would need to be permanently removed to deliver the junction visibility splays as the proposed site access.
- 2.70 As reported earlier in this report a seven-day ATC was placed on Market Street to record both the directional vehicle speeds at the proposed site access, as well as the directional traffic flows. The traffic and vehicle speeds are presented in **table 2.7**, with the full survey data presented in **appendix c**.

	Market Street Traffic and Speed Survey Summary	
	Northbound	Southbound
85 th Percentile Speeds	34.2mph	32.4mph
Average Speeds	28.6mph	27.6mph
AM Peak Traffic Flow (PCUs)	352	367
PM Peak Traffic Flow (PCUs)	487	268

Table 2.7: Market Street Traffic and Speed Survey Summary (ECNF 2019 ATC Data)

- 2.71 **Table 2.7** confirms that existing 85th percentile vehicle speeds are in excess of the 30mph speed limit past the draft allocation site access. In addition the traffic flow data confirms that Market Street accommodates 719 and 755 two-way vehicle movements in the AM and PM peaks respectively.
- 2.72 The two-way peak period traffic flows confirms Market Street is a well-used route, and this corridor is also the diversion route for traffic if the A56/M66 is closed between Haslingden and Ramsbottom.
- 2.73 A review of the traffic survey data for each surveyed 24-hour period is provided in **table 2.8**.

	Market Street Traffic and Speed Survey Summary (Vehicles)		
	Northbound	Southbound	Two-Way Flow
27/06/19	4064	3690	7754
28/06/19	4598	4016	8614
29/06/19 (Sat)	3411	3164	6575
30/06/19 (Sun)	2845	2811	5656
01/07/19	3834	3710	7544
02/07/19	4217	3923	8140
03/07/19	4231	3812	8043

Table 2.8: Market Street Traffic and Speed Survey Summary (ECNF 2019 ATC Data)

- 2.74 **Table 2.8** confirms that the weekday daily two-way traffic flows are in excess of 8,000 vehicles per day. The Croft report confirms in table 2.7 that this access will accommodate 100 and 124 vehicle movements in the AM and PM peaks respectively.
- 2.75 The Croft report does not provide a daily development trip generation figure. However, it is generally accepted that the daily development trip generation will be 5 x the combined AM and PM two-way traffic flows. In this instance the daily two-way traffic flows through the Market Street development access will be in excess of 1,100 vehicles.
- 2.76 The reason the daily two-way flows on Market Street and the development traffic flows are relevant is the choice of access proposed in the Croft report. The document states that the development will be accessed by a simple priority junction, but this form of access will not be appropriate when referenced against the design guidance in TD 42/95 Geometric Design of Major/Minor Priority Junctions, as discussed below.
- 2.77 Paragraph 2.12 and figure 2/2 in TD 42/95 considers the appropriate form of junctions on the adopted highway. The document states:

“Fig 2/2 may be useful when considering further the options for a site. For single carriageway roads it shows approximately the various levels of T-junction which may be applicable for different combinations of flows. The information takes into account geometric and traffic delays, entry and turning traffic flows, and accident costs.”

- 2.78 For ease of reference Figure 2/2 is provided overleaf.

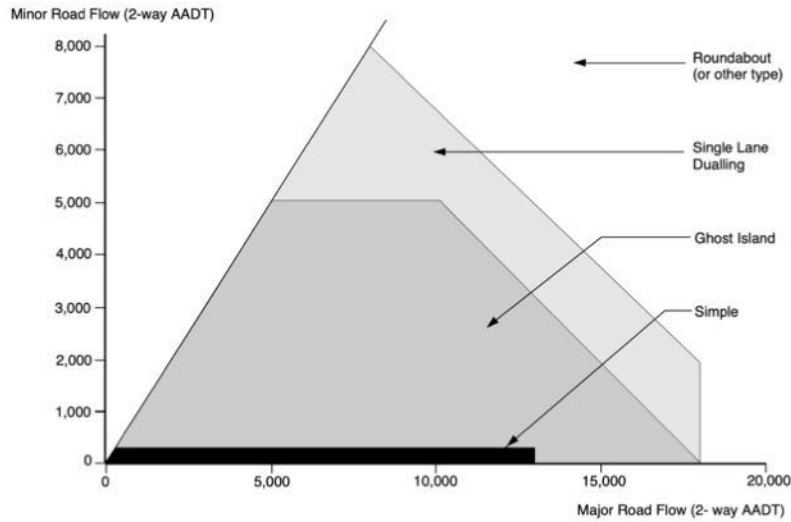


Figure 2/2 : Approximate Level of Provision of T-junctions on New Single Carriageway Roads for Various Major and Minor Road Design Year Traffic Flows (paras 2.2, 2.14)

2.79 With reference to Figure 2.2 TD 42/95 states in paragraphs 2.15 and 2.16:

“Simple junctions are appropriate for most minor junctions on single carriageway roads, but must not be used for wide single carriageways or dual carriageways. For new rural junctions they shall only be used when the design flow in the minor road is not expected to exceed about 300 vehicles 2-way AADT, and that on the major road is not expected to exceed 13,000 vehicles 2-way AADT.

At existing rural, and at urban junctions the cost of upgrading a simple junction to provide a right turning facility will vary from site to site. However, upgrading should always be considered where the minor road flow exceeds 500 vehicles 2-way AADT, a right turning accident problem is evident, or where vehicles waiting on the major road to turn right inhibit the through flow and create a hazard.”

2.80 TD 42/95 is quite clear that where the daily minor arm flows are expected to be in excess of 500 vehicles per day then a ghosted right turn junction should be provided. This is supported by Market Street also, on occasion having to accommodate traffic flow significantly higher than the 8,000 vehicles per day when the A56/M66 is closed and diversionary routes are in place.

2.81 To consider the ability of a ghosted right turn junction to be delivered on Market Street to serve the development a GA drawing has been prepared. This has been prepared in line with the design guidance in TD 42/95, and confirms that the ghosted right turn junction cannot be accommodated in the available space along the site frontage. The GA drawing is provided in **appendix d**.

2.82 This review of traffic flows on Market Street and the estimated development traffic flows that will use the Market Street access confirms that a simple priority junction is not appropriate based on the design guidance presented in TD 42/95. The review of the ability to deliver a ghosted right turn junction on Market Street confirms that this cannot be accommodated within the land controlled by the site promoter.

Southern Development Parcel Access Review

2.83 The Croft report confirms that southern development parcel will be accessed by extending Exchange Street into the draft allocation site.

- 2.84 This access proposal appears to have overlooked the existing residential parking demand on Exchange Street, as well as the constrained junction and visibility splays at the Exchange Street/Market Street junction.
- 2.85 Considering the implications of the existing on-street parking demand the site visits have confirmed that the eastern section of Exchange Street already accommodates a significant level of on-street car parking, effectively reducing the carriageway width down to single way working with a useable carriageway width less than the advised 4.1m carriageway width identified in Manual for Streets that would allow two private cars to pass.



Photo 2.5: Looking West on Exchange Street

- 2.86 The effect of this on-street residential car parking is shown in **photo 2.5**, which confirms that the route can only accommodate shuttle working on the eastern section of the carriageway.
- 2.87 Turning to the existing visibility splays at the Exchange Street/Market Street priority junction the site visits have confirmed that the achievable visibility splays are deficient in terms of the “Y” distance dimensions when compared to the recommended splay dimensions presented in Manual for Streets. For ease of reference the Manual for Streets visibility splay table is presented below.

Table 7.1 Derived SSDs for streets (figures rounded).

Speed	Kilometres per hour	16	20	24	25	30	32	40	45	48	50	60
	Miles per hour	10	12	15	16	19	20	25	28	30	31	37
SSD (metres)		9	12	15	16	20	22	31	36	40	43	56
SSD adjusted for bonnet length. See 7.6.4		11	14	17	18	23	25	33	39	43	45	59
Additional features will be needed to achieve low speeds												

Table 2.9: 2007 Manual for Streets Visibility Splay Requirements

- 2.88 The above table confirms this access should provide visibility splays of 2.4m x 43m in both the leading and trailing traffic directions for a 30mph street.

2.89 The photographic evidence presented in **photos 2.6 and 2.7** confirm the achievable visibility splays at the Exchange Street/Market Street junction.



Photo 2.6: Looking South from Exchange Street onto Market Place



Photo 2.7: Looking North from Exchange Street onto Market Street

2.90 **Photo 2.6** confirms that using the required “X” distance measurement of 2.4m the achievable “Y” distance is 23m, 20m short of the required splay. The geometric alignment of the junction, coupled with the building on the southern side of the junction restricts the visibility in the leading traffic direction as shown on the GA drawing in **appendix e**.

- 2.91 To the north the visibility splay is partly protected by the carriageway approach markings to the zebra crossing. To the north of these markings the intervisibility between motorists on Market Street and Exchange Street is limited by parked vehicles on the western side of the carriageway.
- 2.92 This review of the achievable visibility splays at the Exchange Street/Market Street junction confirms that the proposed access from the southern development land parcel is severely constrained both in terms of the physical width of the carriageway of Exchange Street and the sub-standard visibility in the leading traffic direction at the Exchange Street/Market Street junction.
- 2.93 None of these technical matters have been highlighted in either the MM or Croft reports, suggesting that the identification of suitable access arrangements has not been appropriately assessed when considering these draft site allocations. The need to ensure these sites are deliverable to meet the Council's housing requirements should be appropriately assessed at this stage.

3. Summary and Conclusions

- 3.1 This Development Access and Capacity Review (DACR) has been prepared on behalf of the Edenfield Community Neighbourhood Forum (ECNF). The group has appointed SK Transport Planning (SKTP) to consider Rossendale Council's plan to allocate land in the village for 456 new dwellings.
- 3.2 Rossendale Council is currently preparing its Local Plan for the period 2019 to 2034, with Edenfield village identified to accommodate 456 of the 3,180 new dwellings in the plan period. This is 14.2% of the total draft housing allocation in one village. In a village of 974 dwellings this represents a 46.8% increase in the overall number of dwellings.
- 3.3 This document provides a concise review of the Council's allocation proposals, and has also considered the potential impact (in traffic and transport terms) as well as the proposed access strategies.
- 3.4 The evidence base for this assessment has been the Council's own highway capacity study undertaken by Mott MacDonald, as well as supporting material from the site promoters via the Croft technical assessment report. Commentary has also been provided on the Highways England response to the draft local plan allocations for the village.
- 3.5 This review has identified a number of technical matters that draw into question both the scale of residential development proposed, and the access strategies to identified land parcels. The evidence presented clearly demonstrates that the effects, in traffic and transport terms have not been appropriately assessed and the impacts at the assessed junction in the village are severe in the 2034 future year assessment.
- 3.6 Considering the technical assessment work undertaken to date by both the Council and site promoters the following technical matters have been identified under the Development Impact and Access Strategy headings:

Development Impact Assessment

- 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
- 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
- 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”
- 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
- 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 the 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

- no access appraisal work has been submitted by either the Council or site promoters to demonstrate the development parcels can be safely accessed
- 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
- the Land West of 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
- 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
- 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

- 3.7 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.
- 3.8 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.
- 3.9 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.

- 3.10 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.
- 3.11 Following this review the ECNF have a robust evidence base to present at the Local Plan Examination that the Council and Site Promoters own evidence base has failed to adequately assess the impact of the development proposals, consider the deliverability of the access strategies for the site and identify any form of robust mitigation package to address the impact of the development scale proposed.
- 3.12 Representatives from the ECNF will be presenting the findings from this technical review at the forthcoming Local Plan Examination.

APPENDIX A

Junctions 9
ARCADY 9 - Roundabout Module
Version: 9.0.2.5947 © Copyright TRL Limited, 2017
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 770558 software@trl.co.uk www.trlsoftware.co.uk
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Filename: Market St RA SKTP Base + RBC Flows.j9
Path: W:\Promo\Edenfield Capacity Study
Report generation date: 22/07/2019 20:24:11

- »Market St R/A - SKTP 2024 Base + RBC, AM
- »Market St R/A - SKTP 2034 Base + RBC, AM
- »Market St R/A - SKTP 2024 Base + RBC, PM
- »Market St R/A - SKTP 2034 Base + RBC, PM

Summary of junction performance

	AM				PM			
	Queue (PCU)	Delay (s)	RFC	LOS	Queue (PCU)	Delay (s)	RFC	LOS
Market St R/A - SKTP 2024 Base + RBC								
Arm 1	7.4	50.07	0.89	F	3.6	23.94	0.78	C
Arm 2	2.2	16.15	0.68	C	40.8	177.09	1.08	F
Arm 3	6.5	40.77	0.87	E	1.2	11.99	0.52	B
Market St R/A - SKTP 2034 Base + RBC								
Arm 1	9.7	63.16	0.93	F	4.2	27.03	0.80	D
Arm 2	2.7	18.57	0.72	C	52.0	218.29	1.12	F
Arm 3	8.6	52.84	0.91	F	1.2	12.32	0.53	B

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	Market Street, Edenfield
Location	Edenfield
Site number	1
Date	22/07/2019
Version	
Status	(new file)
Identifier	
Client	Edenfield Action Group
Jobnumber	Sk21941
Enumerator	Michael-PC\Michael
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin

Analysis Options

Mini-roundabout model	Calculate Queue Percentiles	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
JUNCTIONS 9			0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D8	SKTP 2024 Base + RBC	AM	ONE HOUR	07:15	08:45	15
D10	SKTP 2034 Base + RBC	AM	ONE HOUR	07:15	08:45	15
D12	SKTP 2024 Base + RBC	PM	ONE HOUR	16:45	18:15	15
D14	SKTP 2034 Base + RBC	PM	ONE HOUR	16:45	18:15	15

Analysis Set Details

ID	Name	Network flow scaling factor (%)
A1	Market St R/A	100.000

Market St R/A - SKTP 2024 Base + RBC, AM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.89	50.07	7.4	F
2	0.68	16.15	2.2	C
3	0.87	40.77	6.5	E

Main Results for each time segment

07:15 - 07:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	391	266	714	0.548	386	1.3	11.893	B
2	351	131	794	0.442	347	0.9	8.806	A
3	418	197	755	0.553	413	1.3	11.389	B

07:30 - 07:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	467	319	683	0.685	464	2.3	17.746	C
2	419	158	778	0.538	417	1.3	10.923	B
3	499	236	732	0.682	495	2.2	16.477	C

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	573	385	644	0.889	556	6.3	39.214	E
2	513	189	760	0.675	509	2.2	15.586	C
3	611	289	701	0.872	597	5.8	34.029	D

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	573	392	640	0.895	568	7.4	50.072	F
2	513	193	757	0.678	513	2.2	16.154	C
3	611	291	700	0.873	608	6.5	40.769	E

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	467	332	675	0.692	487	2.6	22.750	C
2	419	166	774	0.541	423	1.3	11.395	B
3	499	239	730	0.683	515	2.5	19.568	C

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	391	272	711	0.551	396	1.4	12.797	B
2	351	135	792	0.443	353	0.9	9.053	A
3	418	200	754	0.555	422	1.4	12.109	B

Market St R/A - SKTP 2034 Base + RBC, AM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.93	63.16	9.7	F
2	0.72	18.57	2.7	C
3	0.91	52.84	8.6	F

Main Results for each time segment

07:15 - 07:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	404	273	711	0.568	398	1.4	12.457	B
2	371	135	792	0.469	367	1.0	9.253	A
3	429	209	748	0.574	423	1.4	12.005	B

07:30 - 07:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	482	327	678	0.710	477	2.5	19.268	C
2	443	162	776	0.571	441	1.4	11.773	B
3	512	252	723	0.709	508	2.5	18.061	C

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	590	392	640	0.922	569	7.8	45.853	E
2	543	193	757	0.717	538	2.6	17.671	C
3	628	307	690	0.909	608	7.3	40.939	E

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	590	401	635	0.930	583	9.7	63.163	F
2	543	198	755	0.719	542	2.7	18.567	C
3	628	309	689	0.911	623	8.6	52.844	F

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	482	345	668	0.721	508	3.1	27.970	D
2	443	173	770	0.576	448	1.5	12.486	B
3	512	255	721	0.711	535	2.9	23.496	C

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	404	280	706	0.571	410	1.5	13.627	B
2	371	139	789	0.470	373	1.0	9.571	A
3	429	213	746	0.575	435	1.5	12.937	B

Market St R/A - SKTP 2024 Base + RBC, PM

Data Errors and Warnings
No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.78	23.94	3.6	C
2	1.08	177.09	40.8	F
3	0.52	11.99	1.2	B

Main Results for each time segment

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	388	161	776	0.500	384	1.1	9.993	A
2	537	167	773	0.694	527	2.4	15.582	C
3	245	226	738	0.333	243	0.5	7.970	A

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	464	194	757	0.613	461	1.7	13.281	B
2	641	200	753	0.851	630	5.2	29.559	D
3	293	270	712	0.412	292	0.8	9.415	A

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	568	237	732	0.776	561	3.5	22.303	C
2	785	244	728	1.079	707	24.6	92.995	F
3	359	304	692	0.519	357	1.2	11.766	B

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	568	238	731	0.777	567	3.6	23.942	C
2	785	246	726	1.081	720	40.8	177.094	F
3	359	309	689	0.521	359	1.2	11.987	B

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	464	195	756	0.613	471	1.8	14.222	B
2	641	205	751	0.854	731	18.3	150.940	F
3	293	314	686	0.427	294	0.8	10.144	B

18:00 - 18:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	388	163	775	0.501	391	1.1	10.390	B
2	537	170	771	0.696	599	2.7	30.283	D
3	245	257	720	0.341	246	0.6	8.387	A

Market St R/A - SKTP 2034 Base + RBC, PM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.80	27.03	4.2	D
2	1.12	218.29	52.0	F
3	0.53	12.32	1.2	B

Main Results for each time segment

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	400	165	774	0.516	395	1.1	10.333	B
2	551	171	770	0.715	541	2.6	16.579	C
3	251	233	734	0.343	249	0.6	8.131	A

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	477	198	754	0.633	475	1.8	14.011	B
2	658	206	750	0.877	644	6.1	33.479	D
3	300	277	708	0.424	299	0.8	9.671	A

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	585	242	728	0.803	576	3.9	24.688	C
2	806	250	724	1.113	709	30.2	109.216	F
3	368	305	691	0.532	366	1.2	12.114	B

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	585	243	728	0.803	584	4.2	27.026	D
2	806	253	722	1.116	719	52.0	218.292	F
3	368	309	689	0.534	368	1.2	12.319	B

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	477	200	754	0.633	486	2.0	15.260	C
2	658	211	747	0.881	732	33.6	212.980	F
3	300	315	686	0.438	302	0.9	10.355	B

18:00 - 18:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	400	167	773	0.517	403	1.2	10.793	B
2	551	174	768	0.717	673	3.2	68.991	F
3	251	290	701	0.359	252	0.6	8.857	A

APPENDIX B

Junctions 9
ARCADY 9 - Roundabout Module
Version: 9.0.2.5947 © Copyright TRL Limited, 2017
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 770558 software@trl.co.uk www.trlsoftware.co.uk
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Filename: Market St RA SKTP Base + TW Flows.j9
Path: W:\Promo\Edenfield Capacity Study
Report generation date: 22/07/2019 20:20:42

- »Market St R/A - SKTP 2024 Base + TW, AM
- »Market St R/A - SKTP 2034 Base + TW, AM
- »Market St R/A - SKTP 2024 Base + TW, PM
- »Market St R/A - SKTP 2034 Base + TW, PM

Summary of junction performance

	AM				PM			
	Queue (PCU)	Delay (s)	RFC	LOS	Queue (PCU)	Delay (s)	RFC	LOS
Market St R/A - SKTP 2024 Base + TW								
Arm 1	6.3	42.81	0.87	E	3.3	22.19	0.76	C
Arm 2	2.0	14.99	0.65	B	24.4	116.84	1.02	F
Arm 3	5.0	32.62	0.83	D	1.1	11.64	0.50	B
Market St R/A - SKTP 2034 Base + TW								
Arm 1	8.1	53.37	0.91	F	3.8	24.84	0.79	C
Arm 2	2.4	17.07	0.69	C	40.9	177.52	1.08	F
Arm 3	6.4	40.83	0.87	E	1.1	11.86	0.51	B

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	Market Street, Edenfield
Location	Edenfield
Site number	1
Date	22/07/2019
Version	
Status	(new file)
Identifier	
Client	Edenfield Action Group
Jobnumber	Sk21941
Enumerator	Michael-PC\Michael
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin

Analysis Options

Mini-roundabout model	Calculate Queue Percentiles	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
JUNCTIONS 9			0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D7	SKTP 2024 Base + TW	AM	ONE HOUR	07:15	08:45	15
D9	SKTP 2034 Base + TW	AM	ONE HOUR	07:15	08:45	15
D11	SKTP 2024 Base + TW	PM	ONE HOUR	16:45	18:15	15
D13	SKTP 2034 Base + TW	PM	ONE HOUR	16:45	18:15	15

Analysis Set Details

ID	Name	Network flow scaling factor (%)
A1	Market St R/A	100.000

Market St R/A - SKTP 2024 Base + TW, AM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.87	42.81	6.3	E
2	0.65	14.99	2.0	B
3	0.83	32.62	5.0	D

Main Results for each time segment

07:15 - 07:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	389	251	723	0.538	384	1.2	11.513	B
2	339	129	795	0.426	336	0.8	8.562	A
3	399	197	755	0.528	394	1.2	10.832	B

07:30 - 07:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	465	301	694	0.670	461	2.1	16.775	C
2	405	155	780	0.519	403	1.2	10.472	B
3	476	236	732	0.651	473	2.0	15.139	C

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	569	364	656	0.867	555	5.6	35.141	E
2	495	187	761	0.651	492	2.0	14.552	B
3	584	289	701	0.832	573	4.6	28.755	D

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	569	370	653	0.872	566	6.3	42.810	E
2	495	191	759	0.653	495	2.0	14.988	B
3	584	291	700	0.834	582	5.0	32.621	D

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	465	310	688	0.675	480	2.4	20.279	C
2	405	162	776	0.521	408	1.2	10.843	B
3	476	239	730	0.652	488	2.2	17.023	C

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	389	256	720	0.540	394	1.3	12.277	B
2	339	132	793	0.427	340	0.8	8.776	A
3	399	200	754	0.530	403	1.3	11.396	B

Market St R/A - SKTP 2034 Base + TW, AM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.91	53.37	8.1	F
2	0.69	17.07	2.4	C
3	0.87	40.83	6.4	E

Main Results for each time segment

07:15 - 07:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	401	257	720	0.558	396	1.3	12.045	B
2	359	133	793	0.453	356	0.9	8.983	A
3	410	209	748	0.549	405	1.3	11.391	B

07:30 - 07:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	479	309	689	0.695	475	2.4	18.143	C
2	429	160	777	0.552	427	1.3	11.254	B
3	490	252	723	0.678	486	2.2	16.483	C

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	587	372	652	0.900	569	6.8	40.973	E
2	525	191	759	0.692	521	2.3	16.384	C
3	600	307	690	0.869	586	5.7	34.101	D

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	587	379	648	0.906	582	8.1	53.369	F
2	525	195	756	0.695	525	2.4	17.067	C
3	600	309	689	0.871	597	6.4	40.834	E

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	479	321	682	0.703	500	2.8	23.922	C
2	429	168	772	0.555	433	1.4	11.806	B
3	490	255	721	0.680	506	2.5	19.548	C

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	401	263	716	0.560	407	1.4	13.008	B
2	359	137	791	0.454	361	0.9	9.256	A
3	410	213	746	0.550	415	1.4	12.107	B

Market St R/A - SKTP 2024 Base + TW, PM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.76	22.19	3.3	C
2	1.02	116.84	24.4	F
3	0.50	11.64	1.1	B

Main Results for each time segment

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	385	151	782	0.493	381	1.0	9.775	A
2	509	164	775	0.657	501	2.0	14.081	B
3	233	227	738	0.316	231	0.5	7.787	A

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	460	181	765	0.602	458	1.6	12.822	B
2	608	197	755	0.805	600	4.0	24.246	C
3	279	271	711	0.392	278	0.7	9.123	A

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	564	221	741	0.761	557	3.2	20.878	C
2	744	239	730	1.019	695	16.4	69.238	F
3	341	314	686	0.498	340	1.1	11.391	B

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	564	222	740	0.762	563	3.3	22.187	C
2	744	242	729	1.022	712	24.4	116.838	F
3	341	322	681	0.501	341	1.1	11.645	B

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	460	182	764	0.603	467	1.7	13.609	B
2	608	201	753	0.807	683	5.6	69.205	F
3	279	309	689	0.404	280	0.8	9.713	A

18:00 - 18:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	385	153	781	0.493	388	1.1	10.132	B
2	509	167	773	0.658	522	2.2	16.577	C
3	233	237	732	0.319	234	0.5	7.975	A

Market St R/A - SKTP 2034 Base + TW, PM

Data Errors and Warnings

No errors or warnings

Results

Results Summary for whole modelled period

Arm	Max RFC	Max delay (s)	Max Queue (PCU)	Max LOS
1	0.79	24.84	3.8	C
2	1.08	177.52	40.9	F
3	0.51	11.86	1.1	B

Main Results for each time segment

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	397	154	780	0.509	392	1.1	10.098	B
2	536	168	772	0.694	527	2.4	15.590	C
3	239	233	734	0.326	237	0.5	7.942	A

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	474	186	762	0.622	471	1.7	13.501	B
2	640	202	752	0.851	629	5.2	29.590	D
3	286	278	707	0.404	285	0.7	9.360	A

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	580	227	737	0.787	573	3.6	23.000	C
2	784	246	726	1.079	706	24.6	93.154	F
3	350	312	687	0.510	349	1.1	11.648	B

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	580	228	737	0.787	579	3.8	24.841	C
2	784	249	725	1.082	719	40.9	177.524	F
3	350	318	684	0.512	350	1.1	11.861	B

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	474	187	761	0.623	482	1.9	14.536	B
2	640	207	750	0.854	730	18.4	151.502	F
3	286	323	681	0.420	287	0.8	10.094	B

18:00 - 18:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	LOS
1	397	156	779	0.509	400	1.2	10.516	B
2	536	171	770	0.696	599	2.7	30.454	D
3	239	265	715	0.335	240	0.6	8.362	A

APPENDIX C

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Thursday 27/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	13	0	0	0	0	0	0	0	0	0	0	0	0	13
2	6	0	0	0	0	0	0	0	0	0	0	0	0	6
3	7	0	0	0	0	0	0	0	0	0	0	0	0	7
4	3	0	0	0	0	0	0	0	0	0	0	0	0	3
5	8	0	0	0	0	0	0	0	0	0	0	0	0	8
6	32	1	0	0	0	0	0	0	0	0	0	0	0	33
7	83	4	0	0	0	0	0	1	0	0	0	1	0	89
8	269	9	0	0	0	0	0	1	0	0	0	5	0	284
9	336	9	0	0	0	0	0	0	1	0	1	8	0	355
10	200	6	0	0	0	0	0	0	0	0	0	5	0	211
11	159	5	0	0	0	0	0	0	0	0	0	9	0	173
12	169	5	0	0	0	0	0	0	0	0	0	7	0	181
13	187	6	0	1	0	0	0	1	0	0	0	7	0	202
14	197	4	0	0	0	0	0	0	0	0	0	5	0	206
15	277	9	0	1	0	0	0	0	0	0	0	7	0	294
16	255	8	0	0	0	0	0	0	1	0	0	6	0	270
17	379	8	0	1	0	0	0	0	0	0	0	4	0	392
18	463	9	0	1	0	0	0	0	0	0	0	3	0	476
19	306	8	0	0	0	0	0	0	0	0	0	4	0	318
20	205	4	0	0	0	0	0	0	0	0	0	4	0	213
21	124	3	0	0	0	0	0	0	0	0	0	2	0	129
22	104	3	0	0	0	0	0	0	0	0	0	2	0	109
23	63	1	0	0	0	0	0	0	0	0	0	1	0	65
24	25	1	0	0	0	0	0	0	0	0	0	1	0	27

7-19	3197	86	0	4	0	0	0	2	2	0	1	70	0	3362
6-22	3713	100	0	4	0	0	0	3	2	0	1	79	0	3902
6-24	3801	102	0	4	0	0	0	3	2	0	1	81	0	3994
0-24	3870	103	0	4	0	0	0	3	2	0	1	81	0	4064

Direction : SOUTHBOUND

Thursday 27/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	16	0	0	0	0	0	0	0	0	0	0	0	0	16
2	6	0	0	0	0	0	0	0	0	0	0	0	0	6
3	7	0	0	0	0	0	0	0	0	0	0	0	0	7
4	3	0	0	0	0	0	0	0	0	0	0	0	0	3
5	7	0	0	0	0	0	0	0	0	0	0	0	0	7
6	44	1	0	0	0	0	0	0	0	0	0	1	0	46
7	157	3	0	1	0	0	0	0	0	0	0	2	0	163
8	417	7	0	0	0	0	0	0	0	0	0	6	0	430
9	344	7	0	0	0	0	0	0	0	0	0	1	0	352
10	201	4	0	0	0	0	0	0	0	0	0	2	0	207
11	179	6	0	0	0	0	0	0	0	0	0	4	0	189
12	187	5	0	0	0	0	0	0	0	0	0	4	0	196
13	194	4	0	0	0	0	0	0	0	0	0	3	0	201
14	194	5	0	0	0	0	0	0	0	0	0	4	0	203
15	221	5	0	0	0	0	0	0	0	0	0	4	0	230
16	262	6	0	1	0	0	0	1	0	0	0	6	0	276
17	252	5	0	2	0	0	0	0	0	0	0	5	0	264
18	227	3	1	0	0	0	0	1	1	0	0	3	0	236
19	171	3	0	0	0	0	0	0	0	0	0	4	0	178
20	170	3	0	0	0	0	0	1	0	0	0	3	0	177
21	140	2	0	0	0	0	0	0	0	0	0	2	0	144
22	77	0	0	0	0	0	0	0	0	0	0	0	0	77
23	58	0	0	0	0	0	0	0	0	0	0	1	0	59
24	22	1	0	0	0	0	0	0	0	0	0	0	0	23

7-19	2849	60	1	3	0	0	0	2	1	0	0	46	0	2962
6-22	3393	68	1	4	0	0	0	3	1	0	0	53	0	3523
6-24	3473	69	1	4	0	0	0	3	1	0	0	54	0	3605
0-24	3556	70	1	4	0	0	0	3	1	0	0	55	0	3690

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction: NORTHBOUND

Thursday 27/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	2	6	3	2	0	0	0	0	0	0	13
2	0	0	3	0	2	1	0	0	0	0	0	0	6
3	0	0	4	2	1	0	0	0	0	0	0	0	7
4	0	0	2	1	0	0	0	0	0	0	0	0	3
5	0	1	3	2	2	0	0	0	0	0	0	0	8
6	0	1	8	12	9	3	0	0	0	0	0	0	33
7	0	6	20	38	21	4	0	0	0	0	0	0	89
8	0	17	193	63	11	0	0	0	0	0	0	0	284
9	2	33	277	39	4	0	0	0	0	0	0	0	355
10	4	21	136	43	7	0	0	0	0	0	0	0	211
11	3	17	137	14	2	0	0	0	0	0	0	0	173
12	0	8	146	24	3	0	0	0	0	0	0	0	181
13	2	19	136	40	4	1	0	0	0	0	0	0	202
14	0	7	161	35	3	0	0	0	0	0	0	0	206
15	0	9	227	50	6	2	0	0	0	0	0	0	294
16	0	9	193	61	7	0	0	0	0	0	0	0	270
17	1	10	286	85	10	0	0	0	0	0	0	0	392
18	0	36	332	98	5	5	0	0	0	0	0	0	476
19	1	8	208	78	19	3	0	1	0	0	0	0	318
20	0	3	117	75	16	1	1	0	0	0	0	0	213
21	0	9	67	36	11	3	2	1	0	0	0	0	129
22	0	6	57	38	8	0	0	0	0	0	0	0	109
23	0	1	34	20	8	1	1	0	0	0	0	0	65
24	0	0	13	12	2	0	0	0	0	0	0	0	27

7-19	13	194	2432	630	81	11	0	1	0	0	0	0	3362
6-22	13	218	2693	817	137	19	3	2	0	0	0	0	3902
6-24	13	219	2740	849	147	20	4	2	0	0	0	0	3994
0-24	13	221	2762	872	164	26	4	2	0	0	0	0	4064

Direction: SOUTHBOUND

Thursday 27/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	10	5	1	0	0	0	0	0	0	0	16
2	0	0	0	4	2	0	0	0	0	0	0	0	6
3	0	0	2	4	1	0	0	0	0	0	0	0	7
4	0	0	2	1	0	0	0	0	0	0	0	0	3
5	0	0	1	4	0	2	0	0	0	0	0	0	7
6	0	0	13	28	3	2	0	0	0	0	0	0	46
7	0	1	88	58	15	1	0	0	0	0	0	0	163
8	0	36	327	57	9	1	0	0	0	0	0	0	430
9	1	40	282	29	0	0	0	0	0	0	0	0	352
10	0	18	166	22	1	0	0	0	0	0	0	0	207
11	2	28	138	19	2	0	0	0	0	0	0	0	189
12	0	20	156	18	2	0	0	0	0	0	0	0	196
13	2	18	164	15	2	0	0	0	0	0	0	0	201
14	0	7	171	25	0	0	0	0	0	0	0	0	203
15	1	25	186	17	1	0	0	0	0	0	0	0	230
16	0	20	225	27	4	0	0	0	0	0	0	0	276
17	2	9	216	35	2	0	0	0	0	0	0	0	264
18	1	28	181	23	2	1	0	0	0	0	0	0	236
19	0	12	121	42	2	1	0	0	0	0	0	0	178
20	0	10	107	51	7	2	0	0	0	0	0	0	177
21	0	1	98	41	3	1	0	0	0	0	0	0	144
22	0	1	50	19	6	1	0	0	0	0	0	0	77
23	0	3	30	24	1	1	0	0	0	0	0	0	59
24	0	0	10	8	2	2	0	1	0	0	0	0	23

7-19	9	261	2333	329	27	3	0	0	0	0	0	0	2962
6-22	9	274	2676	498	58	8	0	0	0	0	0	0	3523
6-24	9	277	2716	530	61	11	0	1	0	0	0	0	3605
0-24	9	277	2744	576	68	15	0	1	0	0	0	0	3690

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Friday 28/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	16	0	0	0	0	0	0	0	0	0	0	0	0	16
2	10	0	0	0	0	0	0	0	0	0	0	0	0	10
3	5	0	0	0	0	0	0	0	0	0	0	0	0	5
4	5	0	0	0	0	0	0	0	0	0	0	0	0	5
5	8	0	0	0	0	0	0	0	0	0	0	0	0	8
6	26	0	0	0	0	0	0	0	0	0	0	0	0	26
7	91	3	0	0	0	0	0	0	0	0	0	0	0	94
8	239	7	0	0	0	0	0	0	0	0	0	11	0	257
9	351	10	0	0	0	0	0	1	1	0	0	4	0	367
10	198	7	0	0	0	0	0	0	0	0	0	4	0	209
11	218	7	0	0	0	0	0	0	0	0	0	6	0	231
12	170	6	0	0	0	0	0	0	1	0	0	4	0	181
13	232	7	0	0	0	0	0	0	0	0	0	5	0	244
14	267	7	0	0	0	0	0	0	1	0	0	4	0	279
15	326	7	0	1	0	0	0	1	1	0	0	7	0	343
16	344	10	0	0	0	0	0	1	0	0	0	6	0	361
17	473	12	0	0	0	0	0	0	0	0	0	2	0	487
18	452	11	0	0	0	0	0	0	0	0	0	6	0	469
19	335	7	0	0	0	0	0	0	0	0	1	5	0	348
20	222	3	0	0	0	0	0	0	0	0	0	3	0	228
21	153	2	0	0	0	0	0	0	0	0	0	3	0	158
22	123	0	0	0	0	0	0	0	0	0	0	1	0	124
23	80	2	0	0	0	0	0	0	0	0	0	0	0	82
24	64	0	0	1	0	0	0	0	0	0	0	1	0	66

7-19	3605	98	0	1	0	0	0	3	4	0	1	64	0	3776
6-22	4194	106	0	1	0	0	0	3	4	0	1	71	0	4380
6-24	4338	108	0	2	0	0	0	3	4	0	1	72	0	4528
0-24	4408	108	0	2	0	0	0	3	4	0	1	72	0	4598

Direction : SOUTHBOUND

Friday 28/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	17	0	0	0	0	0	0	0	0	0	0	0	0	17
2	13	0	0	0	0	0	0	0	0	0	0	0	0	13
3	2	0	0	0	0	0	0	0	0	0	0	0	0	2
4	9	0	0	0	0	0	0	0	0	0	0	0	0	9
5	4	0	0	0	0	0	0	0	0	0	0	0	0	4
6	52	0	0	0	0	0	0	0	0	0	0	1	0	53
7	139	5	0	0	0	0	0	0	0	0	0	2	0	146
8	366	8	0	0	0	0	0	0	0	0	0	5	0	379
9	355	6	0	0	0	0	0	0	0	0	0	3	0	364
10	216	6	0	0	0	0	0	1	0	0	0	2	0	225
11	193	8	0	0	0	0	0	0	0	0	0	5	0	206
12	224	7	0	1	0	0	0	0	1	0	0	5	0	238
13	216	4	0	0	0	0	0	0	0	0	0	4	0	224
14	245	6	0	0	0	0	0	0	0	0	0	3	0	254
15	222	6	0	0	0	0	0	0	1	0	0	4	0	233
16	318	4	0	1	0	0	0	0	0	0	0	5	0	328
17	246	5	0	0	0	0	0	0	0	0	0	4	0	255
18	268	5	0	0	0	0	0	1	0	0	0	4	0	278
19	246	3	0	1	0	0	0	0	0	0	0	3	0	253
20	184	3	0	0	0	0	0	0	0	0	0	2	0	189
21	137	3	0	0	0	0	0	0	0	0	0	1	0	141
22	80	2	0	0	0	0	0	0	0	0	0	0	0	82
23	72	0	0	0	0	0	0	0	0	0	0	1	0	73
24	49	0	0	1	0	0	0	0	0	0	0	0	0	50

7-19	3115	68	0	3	0	0	0	2	2	0	0	47	0	3237
6-22	3655	81	0	3	0	0	0	2	2	0	0	52	0	3795
6-24	3776	81	0	4	0	0	0	2	2	0	0	53	0	3918
0-24	3873	81	0	4	0	0	0	2	2	0	0	54	0	4016

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Friday 28/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	5	7	4	0	0	0	0	0	0	0	16
2	0	1	0	7	0	1	0	1	0	0	0	0	10
3	0	0	1	3	1	0	0	0	0	0	0	0	5
4	0	0	0	3	1	1	0	0	0	0	0	0	5
5	0	0	3	3	1	1	0	0	0	0	0	0	8
6	1	0	7	12	6	0	0	0	0	0	0	0	26
7	0	6	28	36	16	8	0	0	0	0	0	0	94
8	0	15	159	64	17	2	0	0	0	0	0	0	257
9	7	24	289	41	6	0	0	0	0	0	0	0	367
10	0	21	164	22	2	0	0	0	0	0	0	0	209
11	0	18	163	40	10	0	0	0	0	0	0	0	231
12	1	13	122	37	7	1	0	0	0	0	0	0	181
13	0	8	185	42	9	0	0	0	0	0	0	0	244
14	0	30	193	48	6	1	1	0	0	0	0	0	279
15	0	23	252	58	10	0	0	0	0	0	0	0	343
16	1	21	258	77	4	0	0	0	0	0	0	0	361
17	2	16	291	154	22	2	0	0	0	0	0	0	487
18	5	35	303	107	18	1	0	0	0	0	0	0	469
19	2	6	229	94	17	0	0	0	0	0	0	0	348
20	0	10	140	67	9	2	0	0	0	0	0	0	228
21	1	4	90	42	18	3	0	0	0	0	0	0	158
22	0	7	68	30	15	4	0	0	0	0	0	0	124
23	0	0	46	28	6	2	0	0	0	0	0	0	82
24	0	6	30	20	9	1	0	0	0	0	0	0	66

7-19	18	230	2608	784	128	7	1	0	0	0	0	0	3776
6-22	19	257	2934	959	186	24	1	0	0	0	0	0	4380
6-24	19	263	3010	1007	201	27	1	0	0	0	0	0	4528
0-24	20	264	3026	1042	214	30	1	1	0	0	0	0	4598

Direction : SOUTHBOUND

Friday 28/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	9	7	1	0	0	0	0	0	0	0	17
2	0	0	13	0	0	0	0	0	0	0	0	0	13
3	0	0	1	1	0	0	0	0	0	0	0	0	2
4	0	0	2	6	1	0	0	0	0	0	0	0	9
5	0	0	2	2	0	0	0	0	0	0	0	0	4
6	0	0	16	24	9	3	1	0	0	0	0	0	53
7	0	7	65	48	23	2	1	0	0	0	0	0	146
8	3	12	278	75	9	2	0	0	0	0	0	0	379
9	10	37	298	18	1	0	0	0	0	0	0	0	364
10	2	34	171	17	1	0	0	0	0	0	0	0	225
11	0	6	163	33	4	0	0	0	0	0	0	0	206
12	1	13	192	32	0	0	0	0	0	0	0	0	238
13	1	27	171	22	2	0	0	1	0	0	0	0	224
14	0	31	201	21	1	0	0	0	0	0	0	0	254
15	0	14	186	31	1	1	0	0	0	0	0	0	233
16	2	12	266	41	7	0	0	0	0	0	0	0	328
17	1	13	185	47	9	0	0	0	0	0	0	0	255
18	0	22	203	46	7	0	0	0	0	0	0	0	278
19	0	9	188	51	3	2	0	0	0	0	0	0	253
20	0	7	129	42	9	2	0	0	0	0	0	0	189
21	1	8	88	41	3	0	0	0	0	0	0	0	141
22	0	2	51	22	7	0	0	0	0	0	0	0	82
23	0	4	52	12	4	0	0	1	0	0	0	0	73
24	1	1	40	4	4	0	0	0	0	0	0	0	50

7-19	20	230	2502	434	45	5	0	1	0	0	0	0	3237
6-22	21	254	2835	587	87	9	1	1	0	0	0	0	3795
6-24	22	259	2927	603	95	9	1	2	0	0	0	0	3918
0-24	22	259	2970	643	106	12	2	2	0	0	0	0	4016

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Saturday 29/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	26	0	0	0	0	0	0	0	0	0	0	0	0	26
2	20	0	0	0	0	0	0	0	0	0	0	0	0	20
3	7	2	0	0	0	0	0	0	0	0	0	0	0	9
4	4	0	0	0	0	0	0	0	0	0	0	0	0	4
5	4	0	0	0	0	0	0	0	0	0	0	0	0	4
6	16	0	0	0	0	0	0	0	0	0	0	0	0	16
7	29	0	0	0	0	0	0	0	0	0	0	0	0	29
8	68	4	0	0	0	0	0	0	0	0	0	1	0	73
9	158	5	0	0	0	0	0	0	0	0	0	2	0	165
10	209	6	0	0	0	0	0	1	0	0	0	2	0	218
11	231	5	0	0	0	0	0	0	0	0	0	6	0	242
12	265	7	0	1	0	0	0	0	0	0	0	5	0	278
13	301	6	0	0	0	0	0	0	0	0	0	4	0	311
14	281	4	0	1	0	0	0	0	0	0	0	6	0	292
15	263	3	0	0	0	0	0	1	0	0	0	6	0	273
16	218	4	0	0	0	0	0	0	0	0	0	5	0	227
17	278	5	0	0	0	0	0	0	0	0	0	7	0	290
18	209	4	0	0	0	0	0	0	0	0	0	7	0	220
19	181	2	0	0	0	0	0	0	0	0	0	5	0	188
20	168	2	0	0	0	0	0	0	0	0	0	3	0	173
21	112	2	0	0	0	0	0	0	0	0	0	3	0	117
22	75	1	0	0	0	0	0	0	0	0	0	2	0	78
23	99	1	0	0	0	0	0	0	0	0	0	0	0	100
24	57	0	0	0	0	0	0	0	0	0	0	1	0	58

7-19	2662	55	0	2	0	0	0	2	0	0	0	56	0	2777
6-22	3046	60	0	2	0	0	0	2	0	0	0	64	0	3174
6-24	3202	61	0	2	0	0	0	2	0	0	0	65	0	3332
0-24	3279	63	0	2	0	0	0	2	0	0	0	65	0	3411

Direction : SOUTHBOUND

Saturday 29/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	31	0	0	0	0	0	0	0	0	0	0	0	0	31
2	16	0	0	0	0	0	0	1	0	0	0	0	0	17
3	9	0	0	0	0	0	0	0	0	0	0	0	0	9
4	3	0	0	0	0	0	0	0	0	0	0	0	0	3
5	9	0	0	0	0	0	0	0	0	0	0	0	0	9
6	18	0	0	0	0	0	0	0	0	0	0	0	0	18
7	34	2	0	0	0	0	0	0	0	0	0	0	0	36
8	92	3	0	0	0	0	0	0	0	0	0	1	0	96
9	146	3	0	0	0	0	0	0	0	0	0	4	0	153
10	172	4	0	0	0	0	0	0	0	0	0	5	0	181
11	221	5	0	0	0	0	0	0	0	0	0	5	0	231
12	253	6	0	0	0	0	0	0	0	0	0	5	0	264
13	262	5	0	0	0	0	0	0	0	0	0	6	0	273
14	291	2	0	2	0	0	0	0	0	0	0	6	0	301
15	237	4	0	0	0	0	0	0	0	0	0	4	0	245
16	233	2	0	0	0	0	0	0	0	0	0	6	0	241
17	215	3	0	1	0	0	0	0	0	0	0	4	0	223
18	165	2	0	0	0	0	0	0	0	0	0	5	0	172
19	161	1	0	0	0	0	0	0	0	0	0	2	0	164
20	159	2	0	0	0	0	0	0	0	0	0	3	0	164
21	120	2	0	0	0	0	0	0	0	0	0	2	0	124
22	82	2	0	0	0	0	0	0	0	0	0	1	0	85
23	69	0	0	0	0	0	0	0	0	0	0	1	0	70
24	53	1	0	0	0	0	0	0	0	0	0	0	0	54

7-19	2448	40	0	3	0	0	0	0	0	0	0	53	0	2544
6-22	2843	48	0	3	0	0	0	0	0	0	0	59	0	2953
6-24	2965	49	0	3	0	0	0	0	0	0	0	60	0	3077
0-24	3051	49	0	3	0	0	0	1	0	0	0	60	0	3164

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Saturday 29/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	10	14	2	0	0	0	0	0	0	0	26
2	0	0	2	4	11	0	2	1	0	0	0	0	20
3	0	0	3	6	0	0	0	0	0	0	0	0	9
4	1	0	1	1	1	0	0	0	0	0	0	0	4
5	0	0	3	1	0	0	0	0	0	0	0	0	4
6	0	1	3	8	3	1	0	0	0	0	0	0	16
7	1	6	7	10	4	1	0	0	0	0	0	0	29
8	0	2	24	32	13	2	0	0	0	0	0	0	73
9	0	13	96	47	7	2	0	0	0	0	0	0	165
10	4	12	144	48	8	2	0	0	0	0	0	0	218
11	1	21	175	37	7	1	0	0	0	0	0	0	242
12	0	22	213	39	4	0	0	0	0	0	0	0	278
13	2	33	224	43	9	0	0	0	0	0	0	0	311
14	3	12	204	55	14	4	0	0	0	0	0	0	292
15	0	12	178	74	7	2	0	0	0	0	0	0	273
16	1	10	137	67	12	0	0	0	0	0	0	0	227
17	1	10	203	64	10	1	1	0	0	0	0	0	290
18	0	9	146	59	6	0	0	0	0	0	0	0	220
19	0	6	101	70	10	1	0	0	0	0	0	0	188
20	1	3	110	49	9	1	0	0	0	0	0	0	173
21	0	1	65	41	9	1	0	0	0	0	0	0	117
22	0	0	51	20	6	1	0	0	0	0	0	0	78
23	0	3	49	39	8	1	0	0	0	0	0	0	100
24	0	2	31	18	4	3	0	0	0	0	0	0	58

7-19	12	162	1845	635	107	15	1	0	0	0	0	0	2777
6-22	14	172	2078	755	135	19	1	0	0	0	0	0	3174
6-24	14	177	2158	812	147	23	1	0	0	0	0	0	3332
0-24	15	178	2180	846	164	24	3	1	0	0	0	0	3411

Direction : SOUTHBOUND

Saturday 29/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	18	8	4	1	0	0	0	0	0	0	31
2	0	0	9	6	1	1	0	0	0	0	0	0	17
3	0	0	4	3	2	0	0	0	0	0	0	0	9
4	0	1	1	1	0	0	0	0	0	0	0	0	3
5	0	1	1	2	1	4	0	0	0	0	0	0	9
6	0	0	9	6	3	0	0	0	0	0	0	0	18
7	2	2	17	9	6	0	0	0	0	0	0	0	36
8	0	2	55	30	6	1	1	0	1	0	0	0	96
9	0	12	102	32	7	0	0	0	0	0	0	0	153
10	2	14	130	31	4	0	0	0	0	0	0	0	181
11	0	25	189	17	0	0	0	0	0	0	0	0	231
12	4	21	219	20	0	0	0	0	0	0	0	0	264
13	2	29	202	35	4	1	0	0	0	0	0	0	273
14	1	9	240	46	3	2	0	0	0	0	0	0	301
15	0	8	194	42	1	0	0	0	0	0	0	0	245
16	0	11	184	37	7	2	0	0	0	0	0	0	241
17	4	14	180	22	3	0	0	0	0	0	0	0	223
18	0	7	137	23	4	1	0	0	0	0	0	0	172
19	1	6	109	40	7	1	0	0	0	0	0	0	164
20	0	6	106	45	7	0	0	0	0	0	0	0	164
21	1	6	77	36	3	1	0	0	0	0	0	0	124
22	0	2	60	20	2	0	0	1	0	0	0	0	85
23	0	1	45	18	3	3	0	0	0	0	0	0	70
24	0	2	26	18	4	4	0	0	0	0	0	0	54

7-19	14	158	1941	375	46	8	1	0	1	0	0	0	2544
6-22	17	174	2201	485	64	9	1	1	1	0	0	0	2953
6-24	17	177	2272	521	71	16	1	1	1	0	0	0	3077
0-24	17	179	2314	547	82	22	1	1	1	0	0	0	3164

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Sunday 30/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	32	0	0	0	0	0	0	0	0	0	0	1	0	33
2	24	1	0	0	0	0	0	0	0	0	0	0	0	25
3	20	0	0	0	0	0	0	0	0	0	0	0	0	20
4	8	0	0	0	0	0	0	0	0	0	0	0	0	8
5	6	0	0	0	0	0	0	0	0	0	0	0	0	6
6	11	0	0	0	0	0	0	0	0	0	0	0	0	11
7	21	1	0	0	0	0	0	0	0	0	0	0	0	22
8	31	2	0	0	0	0	0	0	0	0	0	0	0	33
9	71	2	0	0	0	0	0	0	0	0	0	0	0	73
10	152	1	0	0	0	0	0	0	0	0	0	0	0	153
11	176	2	0	0	0	0	0	0	0	0	0	3	0	181
12	209	2	0	0	0	0	0	0	0	0	0	3	0	214
13	211	4	0	0	0	0	0	0	0	0	0	3	0	218
14	264	4	0	0	0	0	0	0	0	0	0	2	0	270
15	252	2	0	0	0	0	0	1	0	0	0	2	0	257
16	280	5	0	0	0	0	0	0	0	0	0	4	0	289
17	228	3	0	1	0	0	0	0	0	0	0	4	0	236
18	216	2	0	0	0	0	0	0	0	0	0	3	0	221
19	153	2	0	0	0	0	0	0	0	0	0	2	0	157
20	149	4	0	0	0	0	0	0	0	0	0	1	0	154
21	93	2	0	0	0	0	0	0	0	0	0	0	0	95
22	75	1	0	0	0	0	0	0	0	0	0	0	0	76
23	54	0	0	0	0	0	0	0	0	0	0	0	0	54
24	39	0	0	0	0	0	0	0	0	0	0	0	0	39

7-19	2243	31	0	1	0	0	0	1	0	0	0	26	0	2302
6-22	2581	39	0	1	0	0	0	1	0	0	0	27	0	2649
6-24	2674	39	0	1	0	0	0	1	0	0	0	27	0	2742
0-24	2775	40	0	1	0	0	0	1	0	0	0	28	0	2845

Direction : SOUTHBOUND

Sunday 30/06/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	41	0	0	0	0	0	0	0	0	0	0	0	0	41
2	30	0	0	0	0	0	0	0	0	0	0	0	0	30
3	16	0	0	0	0	0	0	0	0	0	0	0	0	16
4	6	0	0	0	0	0	0	0	0	0	0	0	0	6
5	7	0	0	0	0	0	0	0	0	0	0	0	0	7
6	9	0	0	0	0	0	0	0	0	0	0	0	0	9
7	12	0	0	0	0	0	0	0	0	0	0	0	0	12
8	43	1	0	0	0	0	0	0	0	0	0	0	0	44
9	76	1	0	0	0	0	0	0	0	0	0	1	0	78
10	114	2	0	0	0	0	0	1	0	0	0	1	0	118
11	178	3	0	0	0	0	0	0	0	0	0	4	0	185
12	209	3	0	0	0	0	0	1	0	0	0	3	0	216
13	281	3	0	0	0	0	0	0	0	0	0	3	0	287
14	286	2	0	0	0	0	0	0	0	0	0	1	0	289
15	258	1	0	2	0	0	0	0	0	0	0	0	0	261
16	231	2	0	0	0	0	0	1	0	0	0	3	0	237
17	232	3	0	0	0	0	0	0	0	0	0	4	0	239
18	179	3	0	0	0	0	0	0	1	0	0	4	0	187
19	172	3	0	0	0	0	0	0	0	0	0	0	0	175
20	134	1	0	0	0	0	0	0	0	0	0	1	0	136
21	86	1	0	0	0	0	0	0	0	0	0	0	0	87
22	81	2	0	0	0	0	0	0	0	0	0	0	0	83
23	46	0	0	0	0	0	0	0	0	0	0	0	0	46
24	22	0	0	0	0	0	0	0	0	0	0	0	0	22

7-19	2259	27	0	2	0	0	0	3	1	0	0	24	0	2316
6-22	2572	31	0	2	0	0	0	3	1	0	0	25	0	2634
6-24	2640	31	0	2	0	0	0	3	1	0	0	25	0	2702
0-24	2749	31	0	2	0	0	0	3	1	0	0	25	0	2811

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Sunday 30/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	12	11	8	2	0	0	0	0	0	0	33
2	0	0	10	5	8	2	0	0	0	0	0	0	25
3	0	1	4	8	6	0	1	0	0	0	0	0	20
4	0	0	2	2	4	0	0	0	0	0	0	0	8
5	0	0	3	1	1	0	0	1	0	0	0	0	6
6	0	0	3	2	5	0	1	0	0	0	0	0	11
7	0	4	3	8	4	2	1	0	0	0	0	0	22
8	0	7	7	13	4	2	0	0	0	0	0	0	33
9	0	8	31	24	7	3	0	0	0	0	0	0	73
10	2	26	74	44	7	0	0	0	0	0	0	0	153
11	0	13	116	38	11	3	0	0	0	0	0	0	181
12	0	25	132	49	8	0	0	0	0	0	0	0	214
13	1	16	150	45	6	0	0	0	0	0	0	0	218
14	0	25	203	41	1	0	0	0	0	0	0	0	270
15	1	12	188	54	2	0	0	0	0	0	0	0	257
16	1	26	222	33	6	1	0	0	0	0	0	0	289
17	0	40	157	31	7	0	1	0	0	0	0	0	236
18	1	22	161	30	7	0	0	0	0	0	0	0	221
19	1	19	102	31	4	0	0	0	0	0	0	0	157
20	0	9	87	45	11	2	0	0	0	0	0	0	154
21	0	3	58	27	6	1	0	0	0	0	0	0	95
22	0	1	43	27	4	0	1	0	0	0	0	0	76
23	0	0	34	14	2	2	0	2	0	0	0	0	54
24	0	0	18	17	4	0	0	0	0	0	0	0	39

7-19	7	239	1543	433	70	9	1	0	0	0	0	0	2302
6-22	7	256	1734	540	95	14	3	0	0	0	0	0	2649
6-24	7	256	1786	571	101	16	3	2	0	0	0	0	2742
0-24	7	257	1820	600	133	20	5	3	0	0	0	0	2845

Direction : SOUTHBOUND

Sunday 30/06/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	2	11	20	7	1	0	0	0	0	0	0	41
2	0	1	7	9	9	1	2	0	1	0	0	0	30
3	0	1	8	5	2	0	0	0	0	0	0	0	16
4	0	0	0	4	2	0	0	0	0	0	0	0	6
5	0	0	1	0	1	4	0	1	0	0	0	0	7
6	0	0	3	5	1	0	0	0	0	0	0	0	9
7	0	1	5	4	2	0	0	0	0	0	0	0	12
8	0	2	20	17	5	0	0	0	0	0	0	0	44
9	0	2	47	25	4	0	0	0	0	0	0	0	78
10	0	8	82	22	6	0	0	0	0	0	0	0	118
11	0	9	132	40	3	1	0	0	0	0	0	0	185
12	0	19	161	33	3	0	0	0	0	0	0	0	216
13	0	19	227	35	6	0	0	0	0	0	0	0	287
14	1	29	232	25	2	0	0	0	0	0	0	0	289
15	1	19	200	37	4	0	0	0	0	0	0	0	261
16	6	20	193	15	3	0	0	0	0	0	0	0	237
17	1	19	189	27	2	1	0	0	0	0	0	0	239
18	0	10	155	22	0	0	0	0	0	0	0	0	187
19	0	14	127	26	8	0	0	0	0	0	0	0	175
20	0	13	95	25	3	0	0	0	0	0	0	0	136
21	0	0	63	20	4	0	0	0	0	0	0	0	87
22	0	0	61	16	6	0	0	0	0	0	0	0	83
23	0	3	28	12	1	1	1	0	0	0	0	0	46
24	0	0	10	10	1	1	0	0	0	0	0	0	22

7-19	9	170	1765	324	46	2	0	0	0	0	0	0	2316
6-22	9	184	1989	389	61	2	0	0	0	0	0	0	2634
6-24	9	187	2027	411	63	4	1	0	0	0	0	0	2702
0-24	9	191	2057	454	85	10	3	1	1	0	0	0	2811

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Monday 01/07/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	12	0	0	0	0	0	0	0	0	0	0	0	0	12
2	6	0	0	0	0	0	0	0	0	0	0	0	0	6
3	3	0	0	0	0	0	0	0	0	0	0	0	0	3
4	3	0	0	0	0	0	0	0	0	0	0	0	0	3
5	4	0	0	0	0	0	0	0	0	0	0	0	0	4
6	21	1	0	0	0	0	0	0	0	0	0	0	0	22
7	77	2	0	0	0	0	0	0	0	0	0	1	0	80
8	240	7	0	0	0	0	0	0	0	0	0	5	0	252
9	325	9	0	0	0	0	0	0	0	0	0	10	0	344
10	186	8	0	0	1	0	0	0	0	0	0	5	0	200
11	164	6	0	0	0	0	0	0	0	0	0	5	0	175
12	174	6	0	0	0	0	0	0	0	0	0	7	0	187
13	189	5	0	0	0	0	0	0	0	0	0	7	0	201
14	170	6	0	0	0	0	0	0	0	0	0	7	0	183
15	253	5	0	0	0	0	0	1	0	0	0	8	0	267
16	270	5	0	0	0	0	0	0	0	0	0	2	0	277
17	361	8	0	0	0	0	0	0	0	0	0	7	0	376
18	440	10	0	0	0	0	0	1	0	0	0	4	0	455
19	243	4	0	0	0	0	0	1	0	0	0	4	0	252
20	192	3	0	0	0	0	0	0	0	0	0	3	0	198
21	142	3	0	1	0	0	0	0	0	0	0	1	0	147
22	112	2	0	0	0	0	0	0	0	0	0	2	0	116
23	38	1	0	0	0	0	0	0	0	0	0	1	0	40
24	34	0	0	0	0	0	0	0	0	0	0	0	0	34

7-19	3015	79	0	0	1	0	0	3	0	0	0	71	0	3169
6-22	3538	89	0	1	1	0	0	3	0	0	0	78	0	3710
6-24	3610	90	0	1	1	0	0	3	0	0	0	79	0	3784
0-24	3659	91	0	1	1	0	0	3	0	0	0	79	0	3834

Direction : SOUTHBOUND

Monday 01/07/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	13	0	0	0	0	0	0	0	0	0	0	0	0	13
2	4	0	0	0	0	0	0	0	0	0	0	0	0	4
3	6	0	0	0	0	0	0	0	0	0	0	0	0	6
4	3	0	0	0	0	0	0	0	0	0	0	0	0	3
5	7	0	0	0	0	0	0	0	0	0	0	0	0	7
6	43	1	0	0	0	0	0	0	0	0	0	2	0	46
7	136	2	0	0	0	0	0	0	0	0	0	4	0	142
8	418	4	1	0	0	0	0	0	0	0	0	3	0	426
9	406	6	0	0	0	0	0	0	0	0	0	3	0	415
10	208	5	0	1	0	0	0	0	0	0	0	3	0	217
11	189	4	0	0	0	0	0	0	0	0	0	4	0	197
12	189	5	0	0	0	0	0	0	0	0	0	4	0	198
13	204	5	0	0	0	0	0	0	0	0	0	2	0	211
14	199	4	0	1	0	0	0	0	0	0	0	4	0	208
15	181	3	0	0	0	0	0	0	0	0	0	3	0	187
16	297	4	0	0	0	0	0	1	0	0	0	2	0	304
17	233	4	0	1	0	0	0	1	0	0	0	5	0	244
18	263	6	0	0	0	0	0	0	0	0	0	3	0	272
19	180	3	0	0	0	0	0	1	0	0	0	4	0	188
20	156	2	0	0	0	0	0	0	0	0	0	1	0	159
21	113	2	0	0	0	0	0	0	0	0	0	2	0	117
22	78	1	0	0	0	0	0	0	0	0	0	0	0	79
23	41	0	0	0	0	0	0	0	0	0	0	0	0	41
24	26	0	0	0	0	0	0	0	0	0	0	0	0	26

7-19	2967	53	1	3	0	0	0	3	0	0	0	40	0	3067
6-22	3450	60	1	3	0	0	0	3	0	0	0	47	0	3564
6-24	3517	60	1	3	0	0	0	3	0	0	0	47	0	3631
0-24	3593	61	1	3	0	0	0	3	0	0	0	49	0	3710

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Monday 01/07/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	1	5	4	2	0	0	0	0	0	0	0	12
2	0	0	1	3	1	0	1	0	0	0	0	0	6
3	0	1	1	1	0	0	0	0	0	0	0	0	3
4	0	0	2	1	0	0	0	0	0	0	0	0	3
5	0	0	1	2	1	0	0	0	0	0	0	0	4
6	1	0	10	5	4	1	1	0	0	0	0	0	22
7	1	3	26	37	13	0	0	0	0	0	0	0	80
8	2	18	159	70	3	0	0	0	0	0	0	0	252
9	4	42	274	24	0	0	0	0	0	0	0	0	344
10	0	14	159	26	1	0	0	0	0	0	0	0	200
11	2	21	121	28	3	0	0	0	0	0	0	0	175
12	1	13	154	18	1	0	0	0	0	0	0	0	187
13	1	14	171	13	2	0	0	0	0	0	0	0	201
14	1	7	128	35	12	0	0	0	0	0	0	0	183
15	0	36	186	42	3	0	0	0	0	0	0	0	267
16	1	26	198	46	2	4	0	0	0	0	0	0	277
17	0	0	252	108	15	1	0	0	0	0	0	0	376
18	0	7	311	124	9	1	3	0	0	0	0	0	455
19	4	11	179	46	12	0	0	0	0	0	0	0	252
20	1	15	117	55	10	0	0	0	0	0	0	0	198
21	0	7	79	48	9	1	2	0	1	0	0	0	147
22	0	3	62	38	12	0	0	0	0	1	0	0	116
23	0	1	22	12	1	4	0	0	0	0	0	0	40
24	0	0	11	16	6	0	0	1	0	0	0	0	34

7-19	16	209	2292	580	63	6	3	0	0	0	0	0	3169
6-22	18	237	2576	758	107	7	5	0	1	1	0	0	3710
6-24	18	238	2609	786	114	11	5	1	1	1	0	0	3784
0-24	19	240	2629	802	122	12	7	1	1	1	0	0	3834

Direction : SOUTHBOUND

Monday 01/07/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	7	3	1	2	0	0	0	0	0	0	13
2	0	0	0	2	1	1	0	0	0	0	0	0	4
3	0	0	4	1	1	0	0	0	0	0	0	0	6
4	0	0	1	1	1	0	0	0	0	0	0	0	3
5	0	0	4	3	0	0	0	0	0	0	0	0	7
6	0	0	21	17	6	2	0	0	0	0	0	0	46
7	0	4	68	49	18	3	0	0	0	0	0	0	142
8	1	75	300	46	3	0	1	0	0	0	0	0	426
9	0	68	329	18	0	0	0	0	0	0	0	0	415
10	0	21	186	7	3	0	0	0	0	0	0	0	217
11	2	39	143	13	0	0	0	0	0	0	0	0	197
12	0	24	149	24	1	0	0	0	0	0	0	0	198
13	1	28	167	15	0	0	0	0	0	0	0	0	211
14	0	17	171	20	0	0	0	0	0	0	0	0	208
15	0	17	157	12	1	0	0	0	0	0	0	0	187
16	1	28	253	22	0	0	0	0	0	0	0	0	304
17	0	16	192	30	6	0	0	0	0	0	0	0	244
18	2	14	201	46	9	0	0	0	0	0	0	0	272
19	0	10	140	33	4	1	0	0	0	0	0	0	188
20	0	11	103	34	11	0	0	0	0	0	0	0	159
21	0	4	85	26	2	0	0	0	0	0	0	0	117
22	0	2	48	20	7	2	0	0	0	0	0	0	79
23	0	0	22	16	2	1	0	0	0	0	0	0	41
24	0	0	17	8	1	0	0	0	0	0	0	0	26

7-19	7	357	2388	286	27	1	1	0	0	0	0	0	3067
6-22	7	378	2692	415	65	6	1	0	0	0	0	0	3564
6-24	7	378	2731	439	68	7	1	0	0	0	0	0	3631
0-24	7	378	2768	466	78	12	1	0	0	0	0	0	3710

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Tuesday 02/07/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	19	0	0	0	0	0	0	0	0	0	0	0	0	19
2	10	0	0	0	0	0	0	0	0	0	0	0	0	10
3	3	0	0	0	0	0	0	0	0	0	0	0	0	3
4	2	0	0	0	0	0	0	0	0	0	0	0	0	2
5	9	0	0	0	0	0	0	0	0	0	0	0	0	9
6	25	1	0	0	0	0	0	0	0	0	0	0	0	26
7	77	4	0	0	0	0	0	0	0	0	0	1	0	82
8	256	5	0	0	0	0	0	0	0	0	0	4	0	265
9	317	10	0	0	0	0	0	0	0	0	0	11	0	338
10	207	7	0	0	0	0	0	0	0	0	1	7	0	222
11	171	6	1	0	0	0	0	0	0	0	0	8	0	186
12	205	6	0	1	0	0	0	0	0	0	0	4	0	216
13	197	6	0	0	0	0	0	0	0	0	0	5	0	208
14	215	9	0	0	0	0	0	0	0	0	0	5	0	229
15	265	9	0	0	0	0	0	0	0	0	0	9	0	283
16	314	6	0	0	0	0	0	0	0	0	0	5	0	325
17	392	11	0	0	0	0	0	0	0	0	0	5	0	408
18	444	8	0	0	0	0	0	1	0	0	0	6	0	459
19	330	6	0	0	0	0	0	0	0	0	0	4	0	340
20	223	5	0	0	0	0	0	1	0	0	0	4	0	233
21	149	2	0	0	0	0	0	1	0	0	0	3	0	155
22	95	2	0	0	0	0	0	0	0	0	0	2	0	99
23	63	0	0	0	0	0	0	0	0	0	0	1	0	64
24	36	0	0	0	0	0	0	0	0	0	0	0	0	36

7-19	3313	89	1	1	0	0	0	1	0	0	1	73	0	3479
6-22	3857	102	1	1	0	0	0	3	0	0	1	83	0	4048
6-24	3956	102	1	1	0	0	0	3	0	0	1	84	0	4148
0-24	4024	103	1	1	0	0	0	3	0	0	1	84	0	4217

Direction : SOUTHBOUND

Tuesday 02/07/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	10	0	0	0	0	0	0	0	0	0	0	0	0	10
2	4	0	0	0	0	0	0	0	0	0	0	0	0	4
3	1	0	0	0	0	0	0	0	0	0	0	0	0	1
4	2	0	0	0	0	0	0	0	0	0	0	0	0	2
5	9	1	0	0	0	0	0	0	0	0	0	0	0	10
6	48	1	0	0	0	0	0	0	0	0	0	1	0	50
7	157	3	0	0	0	0	0	1	0	0	0	3	0	164
8	414	8	0	1	0	0	0	0	0	0	0	6	0	429
9	377	7	0	0	0	0	0	1	0	0	0	4	0	389
10	217	6	0	0	0	0	0	0	0	0	0	4	0	227
11	185	6	0	0	0	0	0	0	0	0	0	4	0	195
12	183	4	0	0	0	0	0	1	0	0	0	6	0	194
13	234	4	0	0	0	0	0	0	0	0	0	6	0	244
14	200	4	0	0	0	0	0	0	0	0	0	7	0	211
15	224	8	0	0	0	0	0	0	0	0	0	4	0	236
16	260	6	0	0	0	0	0	0	0	0	0	4	0	270
17	277	5	0	0	0	0	0	0	0	0	0	5	0	287
18	284	6	0	1	0	0	0	0	0	0	0	3	0	294
19	216	1	0	0	0	0	0	0	0	0	0	3	0	220
20	164	2	0	0	0	0	0	0	0	0	0	3	0	169
21	139	2	0	0	0	0	0	0	0	0	0	1	0	142
22	87	2	0	0	0	0	0	0	0	0	0	0	0	89
23	55	1	0	0	0	0	0	0	0	0	0	0	0	56
24	30	0	0	0	0	0	0	0	0	0	0	0	0	30

7-19	3071	65	0	2	0	0	0	2	0	0	0	56	0	3196
6-22	3618	74	0	2	0	0	0	3	0	0	0	63	0	3760
6-24	3703	75	0	2	0	0	0	3	0	0	0	63	0	3846
0-24	3777	77	0	2	0	0	0	3	0	0	0	64	0	3923

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Tuesday 02/07/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	0	7	7	2	0	3	0	0	0	0	0	19
2	0	1	1	3	5	0	0	0	0	0	0	0	10
3	0	1	0	1	1	0	0	0	0	0	0	0	3
4	0	0	0	0	2	0	0	0	0	0	0	0	2
5	0	0	5	2	2	0	0	0	0	0	0	0	9
6	0	1	6	10	5	3	1	0	0	0	0	0	26
7	0	2	19	32	23	6	0	0	0	0	0	0	82
8	0	17	173	64	9	2	0	0	0	0	0	0	265
9	1	22	238	66	11	0	0	0	0	0	0	0	338
10	1	16	170	31	4	0	0	0	0	0	0	0	222
11	2	23	131	28	2	0	0	0	0	0	0	0	186
12	3	39	158	16	0	0	0	0	0	0	0	0	216
13	3	14	159	28	4	0	0	0	0	0	0	0	208
14	0	16	181	29	3	0	0	0	0	0	0	0	229
15	1	23	224	28	7	0	0	0	0	0	0	0	283
16	0	42	240	34	7	2	0	0	0	0	0	0	325
17	0	32	290	77	8	0	0	0	0	1	0	0	408
18	0	29	336	81	11	1	1	0	0	0	0	0	459
19	1	22	262	47	7	0	0	1	0	0	0	0	340
20	1	7	145	66	12	2	0	0	0	0	0	0	233
21	0	9	80	58	8	0	0	0	0	0	0	0	155
22	0	3	57	32	6	1	0	0	0	0	0	0	99
23	0	1	33	22	6	2	0	0	0	0	0	0	64
24	0	1	15	14	6	0	0	0	0	0	0	0	36

7-19	12	295	2562	529	73	5	1	1	0	1	0	0	3479
6-22	13	316	2863	717	122	14	1	1	0	1	0	0	4048
6-24	13	318	2911	753	134	16	1	1	0	1	0	0	4148
0-24	13	321	2930	776	151	19	5	1	0	1	0	0	4217

Direction : SOUTHBOUND

Tuesday 02/07/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	1	2	5	2	0	0	0	0	0	0	0	10
2	0	0	4	0	0	0	0	0	0	0	0	0	4
3	0	0	1	0	0	0	0	0	0	0	0	0	1
4	0	0	2	0	0	0	0	0	0	0	0	0	2
5	0	0	7	1	2	0	0	0	0	0	0	0	10
6	0	1	19	18	10	1	0	0	1	0	0	0	50
7	0	3	88	57	15	1	0	0	0	0	0	0	164
8	9	70	282	59	9	0	0	0	0	0	0	0	429
9	2	43	322	22	0	0	0	0	0	0	0	0	389
10	2	28	179	17	1	0	0	0	0	0	0	0	227
11	2	26	150	17	0	0	0	0	0	0	0	0	195
12	0	41	144	9	0	0	0	0	0	0	0	0	194
13	1	21	204	12	6	0	0	0	0	0	0	0	244
14	0	18	172	21	0	0	0	0	0	0	0	0	211
15	6	42	170	18	0	0	0	0	0	0	0	0	236
16	3	33	213	20	1	0	0	0	0	0	0	0	270
17	1	22	232	28	4	0	0	0	0	0	0	0	287
18	0	20	234	38	2	0	0	0	0	0	0	0	294
19	3	20	167	27	3	0	0	0	0	0	0	0	220
20	0	15	119	34	0	1	0	0	0	0	0	0	169
21	0	3	101	32	4	1	1	0	0	0	0	0	142
22	0	4	61	19	4	0	1	0	0	0	0	0	89
23	0	0	29	18	6	2	0	1	0	0	0	0	56
24	0	0	19	6	5	0	0	0	0	0	0	0	30

7-19	29	384	2469	288	26	0	0	0	0	0	0	0	3196
6-22	29	409	2838	430	49	3	2	0	0	0	0	0	3760
6-24	29	409	2886	454	60	5	2	1	0	0	0	0	3846
0-24	29	411	2921	478	74	6	2	1	1	0	0	0	3923

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Wednesday 03/07/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	16	0	0	0	0	0	0	0	0	0	0	0	0	16
2	6	0	0	0	0	0	0	0	0	0	0	0	0	6
3	7	0	0	0	0	0	0	0	0	0	0	0	0	7
4	2	0	0	0	0	0	0	0	0	0	0	0	0	2
5	7	0	0	0	0	0	0	0	0	0	0	0	0	7
6	28	1	0	0	0	0	0	0	0	0	0	0	0	29
7	88	2	0	0	0	0	0	0	0	0	0	1	0	91
8	252	11	0	0	0	0	0	0	0	0	0	4	0	267
9	335	7	0	0	0	0	0	1	1	0	0	2	0	346
10	193	7	0	0	0	0	0	0	0	0	0	3	0	203
11	231	6	0	0	0	0	0	0	0	0	0	9	0	246
12	170	7	0	0	0	0	0	0	0	0	0	5	0	182
13	204	9	0	0	0	0	0	1	0	0	0	7	0	221
14	228	6	0	0	0	0	0	0	0	0	0	7	0	241
15	228	8	0	0	0	0	0	0	1	0	0	6	0	243
16	239	6	0	0	0	0	0	0	0	0	0	4	0	249
17	396	10	0	1	0	0	0	2	0	0	0	6	0	415
18	506	9	0	0	0	0	0	1	0	0	0	5	0	521
19	315	8	0	0	0	0	0	0	0	0	0	2	0	325
20	223	4	0	0	0	0	0	0	0	0	0	3	0	230
21	175	4	0	0	0	0	0	0	0	0	0	2	0	181
22	93	1	0	0	0	0	0	0	0	0	0	2	0	96
23	64	1	0	0	0	0	0	0	0	0	0	1	0	66
24	41	0	0	0	0	0	0	0	0	0	0	0	0	41

7-19	3297	94	0	1	0	0	0	5	2	0	0	60	0	3459
6-22	3876	105	0	1	0	0	0	5	2	0	0	68	0	4057
6-24	3981	106	0	1	0	0	0	5	2	0	0	69	0	4164
0-24	4047	107	0	1	0	0	0	5	2	0	0	69	0	4231

Direction : SOUTHBOUND

Wednesday 03/07/2019	VEHICLE CLASSIFICATION													TOTAL
Hr Ending	1	2	3	4	5	6	7	8	9	10	11	12	13	
1	11	0	0	0	0	0	0	0	0	0	0	0	0	11
2	3	0	0	0	0	0	0	0	0	0	0	0	0	3
3	8	0	0	0	0	0	0	0	0	0	0	0	0	8
4	2	0	0	0	0	0	0	0	0	0	0	0	0	2
5	6	0	0	0	0	0	0	0	0	0	0	0	0	6
6	43	0	0	0	0	0	0	0	0	0	0	1	0	44
7	156	3	0	0	0	0	0	0	0	0	0	5	0	164
8	430	8	0	1	0	0	0	3	0	0	0	8	0	450
9	355	6	0	0	0	0	0	0	0	0	0	2	0	363
10	221	5	0	0	0	0	0	1	0	0	0	2	0	229
11	189	6	0	0	0	0	0	1	0	0	0	6	0	202
12	141	4	0	0	0	0	0	0	0	0	0	3	0	148
13	179	7	0	0	0	0	0	1	0	0	0	3	0	190
14	175	4	0	0	0	0	0	0	0	0	0	5	0	184
15	217	5	0	0	0	0	0	0	1	0	0	5	0	228
16	261	3	0	0	0	0	0	0	0	0	1	7	0	272
17	274	4	0	0	0	0	0	1	0	0	0	5	0	284
18	264	6	0	0	0	0	0	0	0	0	0	1	0	271
19	228	3	0	0	0	0	0	1	0	0	0	3	0	235
20	162	2	0	0	0	0	0	0	0	0	0	3	0	167
21	155	2	0	0	0	0	0	0	0	0	0	1	0	158
22	92	1	0	0	0	0	0	0	0	0	0	0	0	93
23	64	1	0	0	0	0	0	0	0	0	0	0	0	65
24	35	0	0	0	0	0	0	0	0	0	0	0	0	35

7-19	2934	61	0	1	0	0	0	8	1	0	1	50	0	3056
6-22	3499	69	0	1	0	0	0	8	1	0	1	59	0	3638
6-24	3598	70	0	1	0	0	0	8	1	0	1	59	0	3738
0-24	3671	70	0	1	0	0	0	8	1	0	1	60	0	3812

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

Wednesday 03/07/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	1	2	3	9	1	0	0	0	0	0	0	16
2	0	0	0	3	2	0	1	0	0	0	0	0	6
3	0	0	4	1	1	0	0	1	0	0	0	0	7
4	0	0	1	0	0	1	0	0	0	0	0	0	2
5	0	0	3	2	2	0	0	0	0	0	0	0	7
6	1	0	8	9	9	2	0	0	0	0	0	0	29
7	0	7	19	34	20	9	1	1	0	0	0	0	91
8	2	27	145	77	15	1	0	0	0	0	0	0	267
9	4	25	280	28	8	1	0	0	0	0	0	0	346
10	0	19	164	18	2	0	0	0	0	0	0	0	203
11	0	14	166	48	17	1	0	0	0	0	0	0	246
12	0	11	138	32	1	0	0	0	0	0	0	0	182
13	6	18	161	32	4	0	0	0	0	0	0	0	221
14	0	27	162	47	4	1	0	0	0	0	0	0	241
15	1	27	181	31	2	1	0	0	0	0	0	0	243
16	0	25	172	47	4	1	0	0	0	0	0	0	249
17	1	21	287	97	9	0	0	0	0	0	0	0	415
18	2	34	373	105	7	0	0	0	0	0	0	0	521
19	1	21	209	82	10	1	1	0	0	0	0	0	325
20	1	12	131	70	13	2	0	0	1	0	0	0	230
21	0	1	113	49	16	2	0	0	0	0	0	0	181
22	0	2	52	31	11	0	0	0	0	0	0	0	96
23	0	4	33	25	4	0	0	0	0	0	0	0	66
24	0	0	13	18	8	2	0	0	0	0	0	0	41

7-19	17	269	2438	644	83	7	1	0	0	0	0	0	3459
6-22	18	291	2753	828	143	20	2	1	1	0	0	0	4057
6-24	18	295	2799	871	155	22	2	1	1	0	0	0	4164
0-24	19	296	2817	889	178	26	3	2	1	0	0	0	4231

Direction : SOUTHBOUND

Wednesday 03/07/2019	VEHICLE SPEED (MPH)												TOTAL
Hr Ending	0-10	11-20	21-30	31-35	36-40	41-45	46-50	51-55	56-60	61-70	71-80	81-120	
1	0	1	3	5	2	0	0	0	0	0	0	0	11
2	0	0	1	2	0	0	0	0	0	0	0	0	3
3	0	0	4	2	1	1	0	0	0	0	0	0	8
4	0	0	1	0	0	0	1	0	0	0	0	0	2
5	0	0	0	4	2	0	0	0	0	0	0	0	6
6	0	0	21	15	8	0	0	0	0	0	0	0	44
7	0	8	95	52	9	0	0	0	0	0	0	0	164
8	1	43	336	63	7	0	0	0	0	0	0	0	450
9	15	41	290	15	2	0	0	0	0	0	0	0	363
10	3	37	172	14	3	0	0	0	0	0	0	0	229
11	0	6	166	27	3	0	0	0	0	0	0	0	202
12	2	28	112	6	0	0	0	0	0	0	0	0	148
13	0	17	152	21	0	0	0	0	0	0	0	0	190
14	0	26	124	27	7	0	0	0	0	0	0	0	184
15	1	44	167	16	0	0	0	0	0	0	0	0	228
16	0	38	208	22	4	0	0	0	0	0	0	0	272
17	0	27	207	40	8	1	1	0	0	0	0	0	284
18	1	20	200	45	5	0	0	0	0	0	0	0	271
19	1	21	169	35	7	2	0	0	0	0	0	0	235
20	1	13	106	42	4	0	1	0	0	0	0	0	167
21	0	6	114	34	3	1	0	0	0	0	0	0	158
22	0	1	62	26	2	1	1	0	0	0	0	0	93
23	0	2	46	12	4	1	0	0	0	0	0	0	65
24	0	0	15	17	2	1	0	0	0	0	0	0	35

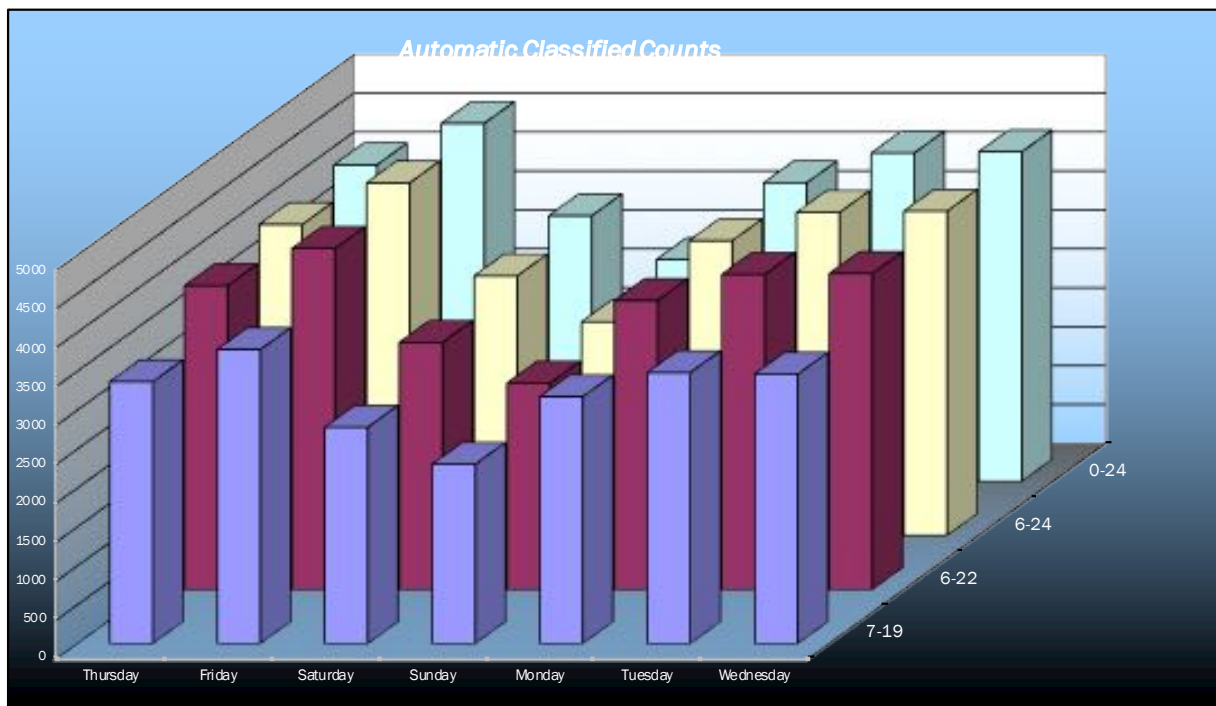
7-19	24	348	2303	331	46	3	1	0	0	0	0	0	3056
6-22	25	376	2680	485	64	5	3	0	0	0	0	0	3638
6-24	25	378	2741	514	70	7	3	0	0	0	0	0	3738
0-24	25	379	2771	542	83	8	4	0	0	0	0	0	3812

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

VEHICLE FLOWS									
Hr Ending	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19	WEEKDAY AVERAGE	WEEK AVERAGE
1	13	16	26	33	12	19	16	15	19
2	6	10	20	25	6	10	6	8	12
3	7	5	9	20	3	3	7	5	8
4	3	5	4	8	3	2	2	3	4
5	8	8	4	6	4	9	7	7	7
6	33	26	16	11	22	26	29	27	23
7	89	94	29	22	80	82	91	87	70
8	284	257	73	33	252	265	267	265	204
9	355	367	165	73	344	338	346	350	284
10	211	209	218	153	200	222	203	209	202
11	173	231	242	181	175	186	246	202	205
12	181	181	278	214	187	216	182	189	206
13	202	244	311	218	201	208	221	215	229
14	206	279	292	270	183	229	241	228	243
15	294	343	273	257	267	283	243	286	280
16	270	361	227	289	277	325	249	296	285
17	392	487	290	236	376	408	415	416	372
18	476	469	220	221	455	459	521	476	403
19	318	348	188	157	252	340	325	317	275
20	213	228	173	154	198	233	230	220	204
21	129	158	117	95	147	155	181	154	140
22	109	124	78	76	116	99	96	109	100
23	65	82	100	54	40	64	66	63	67
24	27	66	58	39	34	36	41	41	43
7-19	3362	3776	2777	2302	3169	3479	3459	3449	3189
6-22	3902	4380	3174	2649	3710	4048	4057	4019	3703
6-24	3994	4528	3332	2742	3784	4148	4164	4124	3813
0-24	4064	4598	3411	2845	3834	4217	4231	4189	3886

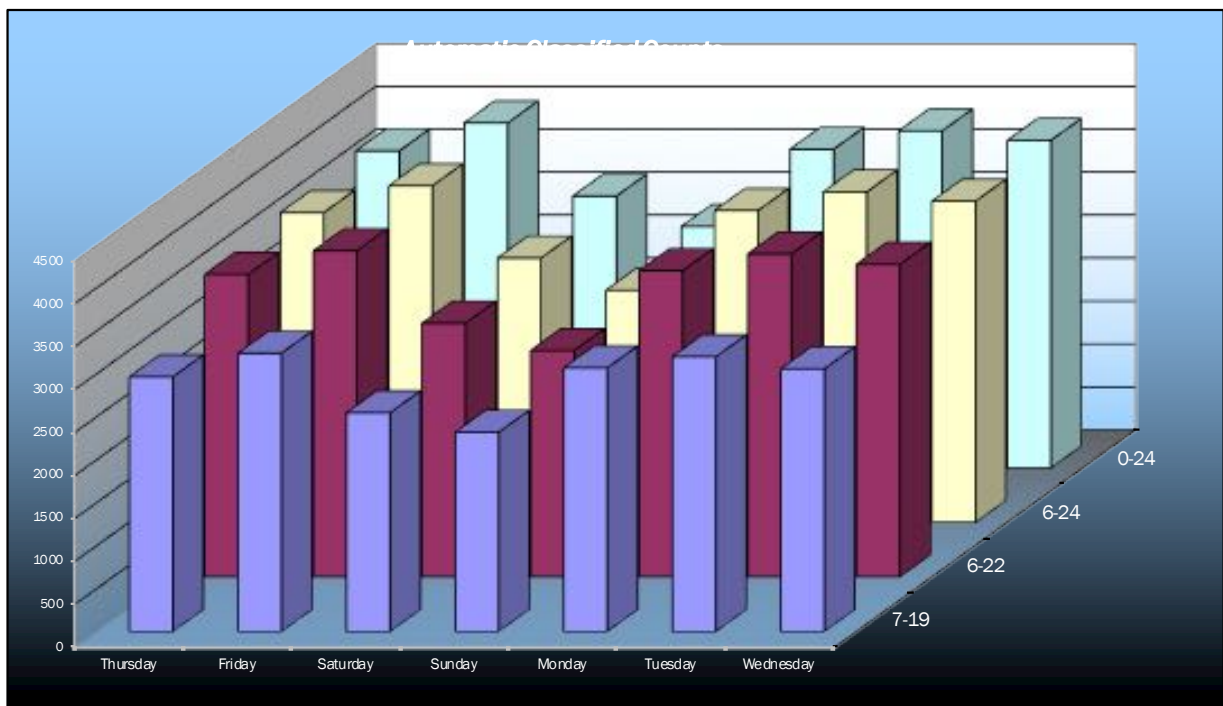


Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : SOUTHBOUND

SOUTHBOUND									
Hr Ending	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19	WEEKDAY AVERAGE	WEEK AVERAGE
1	16	17	31	41	13	10	11	13	20
2	6	13	17	30	4	4	3	6	11
3	7	2	9	16	6	1	8	5	7
4	3	9	3	6	3	2	2	4	4
5	7	4	9	7	7	10	6	7	7
6	46	53	18	9	46	50	44	48	38
7	163	146	36	12	142	164	164	156	118
8	430	379	96	44	426	429	450	423	322
9	352	364	153	78	415	389	363	377	302
10	207	225	181	118	217	227	229	221	201
11	189	206	231	185	197	195	202	198	201
12	196	238	264	216	198	194	148	195	208
13	201	224	273	287	211	244	190	214	233
14	203	254	301	289	208	211	184	212	236
15	230	233	245	261	187	236	228	223	231
16	276	328	241	237	304	270	272	290	275
17	264	255	223	239	244	287	284	267	257
18	236	278	172	187	272	294	271	270	244
19	178	253	164	175	188	220	235	215	202
20	177	189	164	136	159	169	167	172	166
21	144	141	124	87	117	142	158	140	130
22	77	82	85	83	79	89	93	84	84
23	59	73	70	46	41	56	65	59	59
24	23	50	54	22	26	30	35	33	34
7-19	2962	3237	2544	2316	3067	3196	3056	3104	2911
6-22	3523	3795	2953	2634	3564	3760	3638	3656	3410
6-24	3605	3918	3077	2702	3631	3846	3738	3748	3502
0-24	3690	4016	3164	2811	3710	3923	3812	3830	3589



Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : NORTHBOUND

AVERAGE SPEEDS							
Hr Ending	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19
1	34.5	31.9	30.5	32.1	29.3	33.1	34.4
2	32.6	34.3	37.5	32.4	35.1	33.0	37.2
3	29.4	32.5	30.5	32.9	24.7	28.8	32.3
4	28.0	36.0	25.5	33.6	28.0	38.0	34.3
5	29.3	32.1	27.4	33.4	32.4	29.9	31.2
6	32.9	31.1	32.1	34.6	30.4	33.3	32.2
7	31.8	31.4	27.7	31.3	30.4	33.0	32.6
8	27.0	27.7	31.2	28.9	26.9	27.2	27.3
9	25.4	25.5	27.6	28.8	24.6	26.7	25.5
10	26.1	25.4	26.9	26.3	25.8	26.0	25.4
11	24.9	26.6	26.1	27.4	25.5	25.3	27.3
12	26.3	26.8	25.9	26.5	25.5	24.0	26.3
13	26.2	26.9	25.7	26.6	25.3	25.8	25.5
14	26.6	26.1	27.1	25.8	27.3	25.9	26.1
15	26.8	26.5	27.5	26.6	25.5	25.7	25.4
16	27.2	26.6	27.8	25.7	26.1	25.4	26.2
17	27.1	28.1	27.3	25.3	28.2	26.5	27.0
18	26.6	26.8	27.4	25.8	27.8	26.6	26.5
19	28.0	27.8	28.7	26.0	26.7	26.2	27.2
20	29.1	27.9	28.1	28.2	27.4	28.0	28.2
21	28.9	28.9	29.2	28.3	28.9	28.4	28.8
22	28.5	28.8	28.6	29.0	29.3	28.6	29.1
23	29.8	29.4	29.3	29.6	29.6	29.6	28.5
24	29.8	28.8	29.3	30.1	32.0	30.2	32.1
10-12	25.6	26.7	26.0	27.0	25.5	24.6	26.8
14-16	27.0	26.5	27.7	26.2	25.8	25.5	25.8
0-24	28.5	28.9	28.5	29.0	28.0	28.5	29.0

85TH PERCENTILE							
Hr Ending	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19
1	40.0	36.8	34.7	37.8	35.8	41.0	41.3
2	40.6	43.6	44.1	38.7	42.6	40.4	43.0
3	34.6	37.0	34.3	39.8	33.4	40.6	42.7
4	32.3	40.5	39.8	39.1	32.3	38.0	46.6
5	36.9	38.5	31.1	44.3	37.5	35.5	36.9
6	39.3	38.0	38.6	41.6	39.1	40.5	39.8
7	38.3	38.2	36.8	40.7	36.4	38.9	40.2
8	31.8	33.0	36.8	37.4	32.0	32.2	33.3
9	29.8	30.3	33.1	35.6	29.0	31.4	30.1
10	31.9	29.6	32.5	33.0	29.7	30.4	29.3
11	29.7	31.4	31.1	32.9	30.8	30.5	32.4
12	30.0	32.0	30.2	31.9	29.4	29.0	30.3
13	31.5	31.0	30.8	31.5	29.1	30.6	30.9
14	30.4	31.3	32.4	30.0	32.2	29.9	31.2
15	30.9	30.9	32.2	30.9	30.4	30.0	30.2
16	31.3	31.0	32.9	30.3	31.1	30.3	31.1
17	31.3	33.0	32.0	30.8	32.2	31.4	31.5
18	31.4	32.2	31.9	30.8	32.1	31.1	31.0
19	33.1	32.5	33.6	31.4	31.9	30.7	32.3
20	34.0	32.8	32.9	33.7	32.8	33.0	33.9
21	35.7	34.6	33.8	33.3	35.0	33.6	33.5
22	33.8	34.9	33.2	33.9	35.4	33.5	34.2
23	35.5	34.2	34.4	36.2	35.8	35.0	33.8
24	34.1	35.3	35.1	34.6	37.9	35.6	37.3
10-12	29.9	31.7	30.6	32.4	30.1	29.8	31.3
14-16	31.1	31.0	32.6	30.6	30.8	30.2	30.6
0-24	33.7	34.3	34.1	35.0	33.5	33.9	34.9

7 DAY AVERAGE SPEED	28.6
7 DAY AVERAGE 85th PERCENTILE	34.2

Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction : SOUTHBOUND

AVERAGE SPEEDS							
Hr Ending	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19
1	28.6	29.3	29.6	31.2	30.9	30.8	30.3
2	34.7	25.5	29.9	34.3	36.8	25.5	30.5
3	31.6	29.3	30.8	28.8	28.8	25.5	31.1
4	28.0	31.9	24.7	34.7	32.2	25.5	36.8
5	34.8	29.3	35.2	41.2	28.7	28.8	34.7
6	31.6	32.4	30.1	31.1	30.7	31.5	30.3
7	29.4	29.8	27.8	29.3	29.8	29.2	28.1
8	26.0	26.9	29.2	29.4	24.6	24.7	25.7
9	24.9	24.3	26.9	28.3	24.2	24.7	23.9
10	25.5	24.4	26.1	26.9	24.9	24.7	24.2
11	24.7	26.7	25.0	26.9	23.8	24.6	26.4
12	25.3	25.9	25.0	25.9	25.3	23.7	23.6
13	25.1	25.2	25.5	26.0	24.6	25.2	25.4
14	26.1	24.9	26.5	25.2	25.4	25.4	25.7
15	24.9	26.0	26.5	26.0	25.1	23.8	24.0
16	25.7	26.2	26.7	24.8	25.1	24.7	24.9
17	26.1	26.7	25.4	25.6	26.1	25.6	26.1
18	25.1	26.3	26.5	25.8	26.5	25.9	26.2
19	26.8	26.9	27.5	26.4	26.6	25.4	26.2
20	27.8	27.6	27.7	26.2	27.3	26.2	26.9
21	27.9	27.2	27.5	27.8	27.0	27.6	27.1
22	28.4	28.3	27.6	27.8	28.7	27.5	28.2
23	28.6	27.2	28.6	27.9	29.5	30.4	27.6
24	31.9	26.5	29.9	30.3	28.3	29.1	30.4
10-12	25.0	26.3	25.0	26.4	24.5	24.2	25.0
14-16	25.3	26.1	26.6	25.4	25.1	24.2	24.5
0-24	27.9	27.3	27.7	28.7	27.5	26.5	27.7

85TH PERCENTILE							
Hr Ending	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19
1	33.0	33.7	35.0	37.1	37.7	37.6	36.9
2	37.2	25.5	35.3	42.7	41.5	25.5	34.8
3	36.1	34.6	36.1	34.7	34.2	-	37.9
4	32.3	35.9	33.4	37.2	38.5	25.5	52.7
5	41.0	33.6	44.9	49.5	32.7	34.2	37.2
6	36.2	38.0	35.1	35.5	36.0	38.3	35.3
7	34.1	35.9	35.8	35.8	35.3	34.1	33.1
8	30.4	31.5	35.2	34.8	29.8	30.7	30.3
9	29.0	29.1	31.9	32.9	28.3	28.7	29.3
10	29.4	29.2	31.1	31.7	28.6	29.2	29.3
11	29.8	30.4	28.8	31.3	28.8	29.3	29.9
12	29.4	29.7	29.2	30.4	29.7	28.3	28.5
13	29.4	30.1	30.4	30.1	28.9	29.3	29.3
14	29.3	29.1	30.5	29.3	29.1	29.2	31.0
15	29.1	29.9	30.1	30.3	28.8	29.2	28.8
16	29.6	30.2	31.1	29.6	28.9	29.2	29.4
17	29.9	31.3	30.0	30.0	30.2	29.7	31.0
18	29.8	30.8	30.5	29.3	31.2	29.8	30.7
19	31.5	31.1	32.4	31.2	31.0	30.3	31.3
20	32.9	32.3	32.3	31.0	32.5	30.9	32.3
21	32.0	32.3	32.7	31.7	31.1	32.2	31.4
22	33.2	33.1	32.5	32.0	34.0	32.5	32.9
23	33.7	32.8	33.7	34.0	34.1	36.4	32.5
24	39.3	31.7	36.1	35.3	32.3	34.1	35.1
10-12	29.6	30.0	29.0	30.8	29.3	28.8	29.2
14-16	29.3	30.1	30.6	30.0	28.8	29.2	29.1
0-24	32.4	31.7	33.1	33.6	32.2	31.0	33.0

7 DAY AVERAGE SPEED	27.6
7 DAY AVERAGE 85th PERCENTILE	32.4

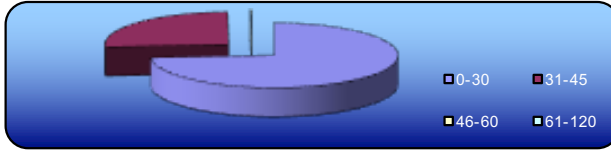
Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

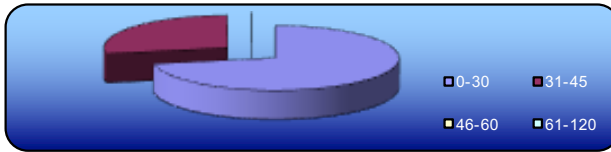
Direction : NORTHBOUND

SPEED SUMMARY							
SPEED (MPH)	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19
0-30	2996	3310	2373	2084	2888	3264	3132
31-45	1062	1286	1034	753	936	946	1093
46-60	6	2	4	8	9	6	6
61-120	0	0	0	0	1	1	0
TOTAL	4064	4598	3411	2845	3834	4217	4231

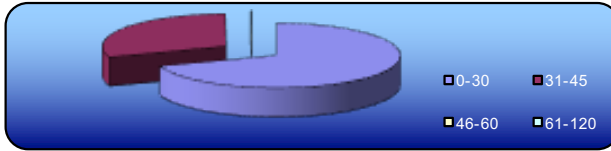
Thursday
27-Jun-19



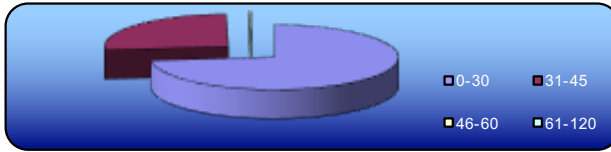
Friday
28-Jun-19



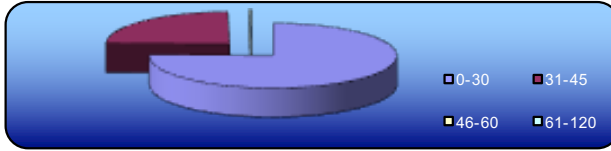
Saturday
29-Jun-19



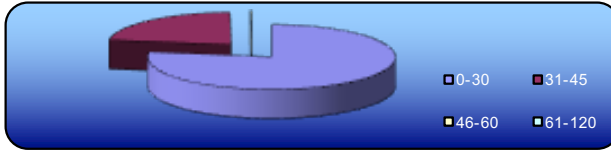
Sunday
30-Jun-19



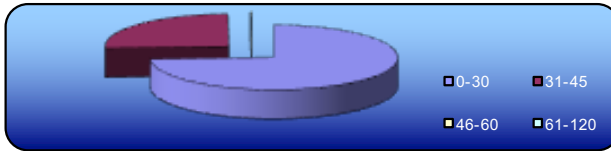
Monday
1-Jul-19



Tuesday
2-Jul-19



Wednesday
3-Jul-19



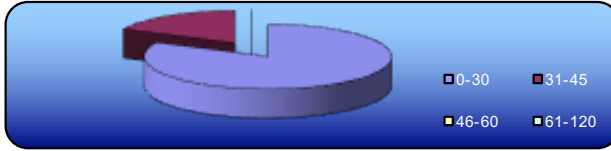
Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

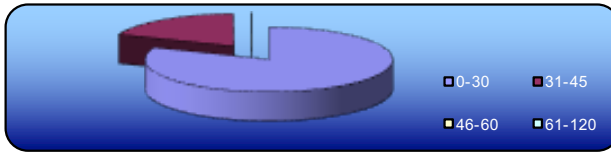
Direction : SOUTHBOUND

SPEED SUMMARY							
SPEED (MPH)	Thursday 27-Jun-19	Friday 28-Jun-19	Saturday 29-Jun-19	Sunday 30-Jun-19	Monday 1-Jul-19	Tuesday 2-Jul-19	Wednesday 3-Jul-19
0-30	3030	3251	2510	2257	3153	3361	3175
31-45	659	761	651	549	556	558	633
46-60	1	4	3	5	1	4	4
61-120	0	0	0	0	0	0	0
TOTAL	3690	4016	3164	2811	3710	3923	3812

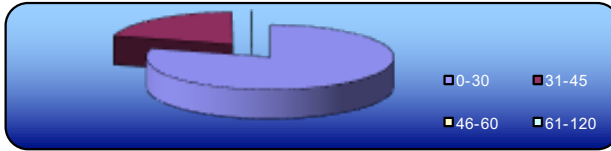
Thursday
27-Jun-19



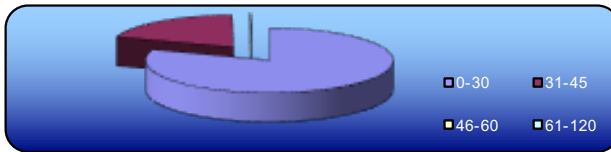
Friday
28-Jun-19



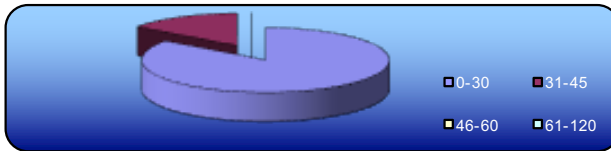
Saturday
29-Jun-19



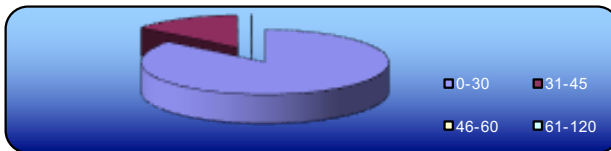
Sunday
30-Jun-19



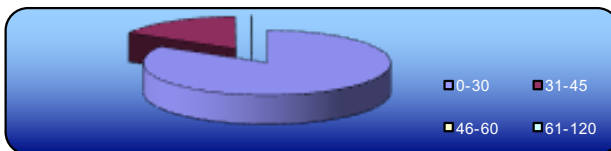
Monday
1-Jul-19



Tuesday
2-Jul-19



Wednesday
3-Jul-19

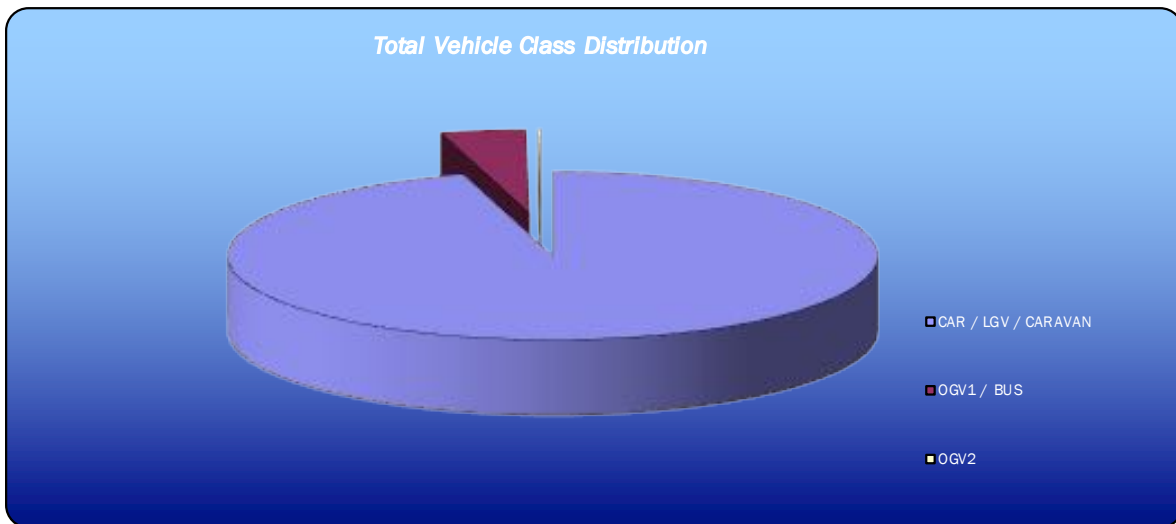


Automatic Classified Counts, Edenfield

LOCATION: MARKET STREET

Direction: NORTHBOUND

VEHICLE CLASSIFICATION				
	CAR / LGV / CARAVAN	OGV1 / BUS	OGV2	TOTAL
27-Jun-19				
7-19	3197	156	9	3362
6-22	3713	179	10	3902
6-24	3801	183	10	3994
0-24	3870	184	10	4064
28-Jun-19				
7-19	3605	162	9	3776
6-22	4194	177	9	4380
6-24	4338	180	10	4528
0-24	4408	180	10	4598
29-Jun-19				
7-19	2662	111	4	2777
6-22	3046	124	4	3174
6-24	3202	126	4	3332
0-24	3279	128	4	3411
30-Jun-19				
7-19	2243	57	2	2302
6-22	2581	66	2	2649
6-24	2674	66	2	2742
0-24	2775	68	2	2845
1-Jul-19				
7-19	3015	151	3	3169
6-22	3538	168	4	3710
6-24	3610	170	4	3784
0-24	3659	171	4	3834
2-Jul-19				
7-19	3313	163	3	3479
6-22	3857	186	5	4048
6-24	3956	187	5	4148
0-24	4024	188	5	4217
3-Jul-19				
7-19	3297	154	8	3459
6-22	3876	173	8	4057
6-24	3981	175	8	4164
0-24	4047	176	8	4231
AVERAGE				
7-19	3047	136	5	3189
6-22	3544	153	6	3703
6-24	3652	155	6	3813
0-24	3723	156	6	3886

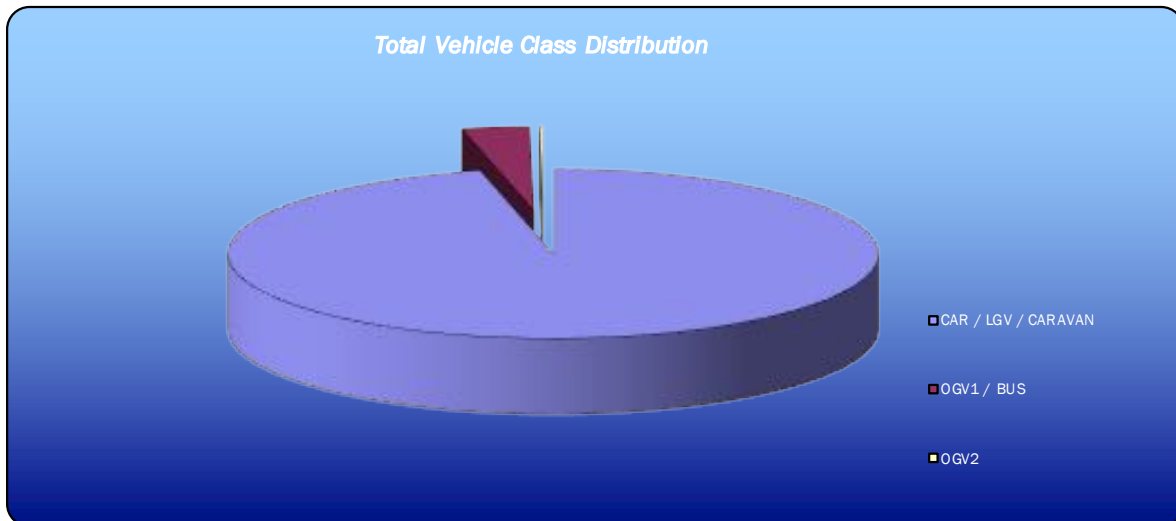


Automatic Classified Counts, Edenfield

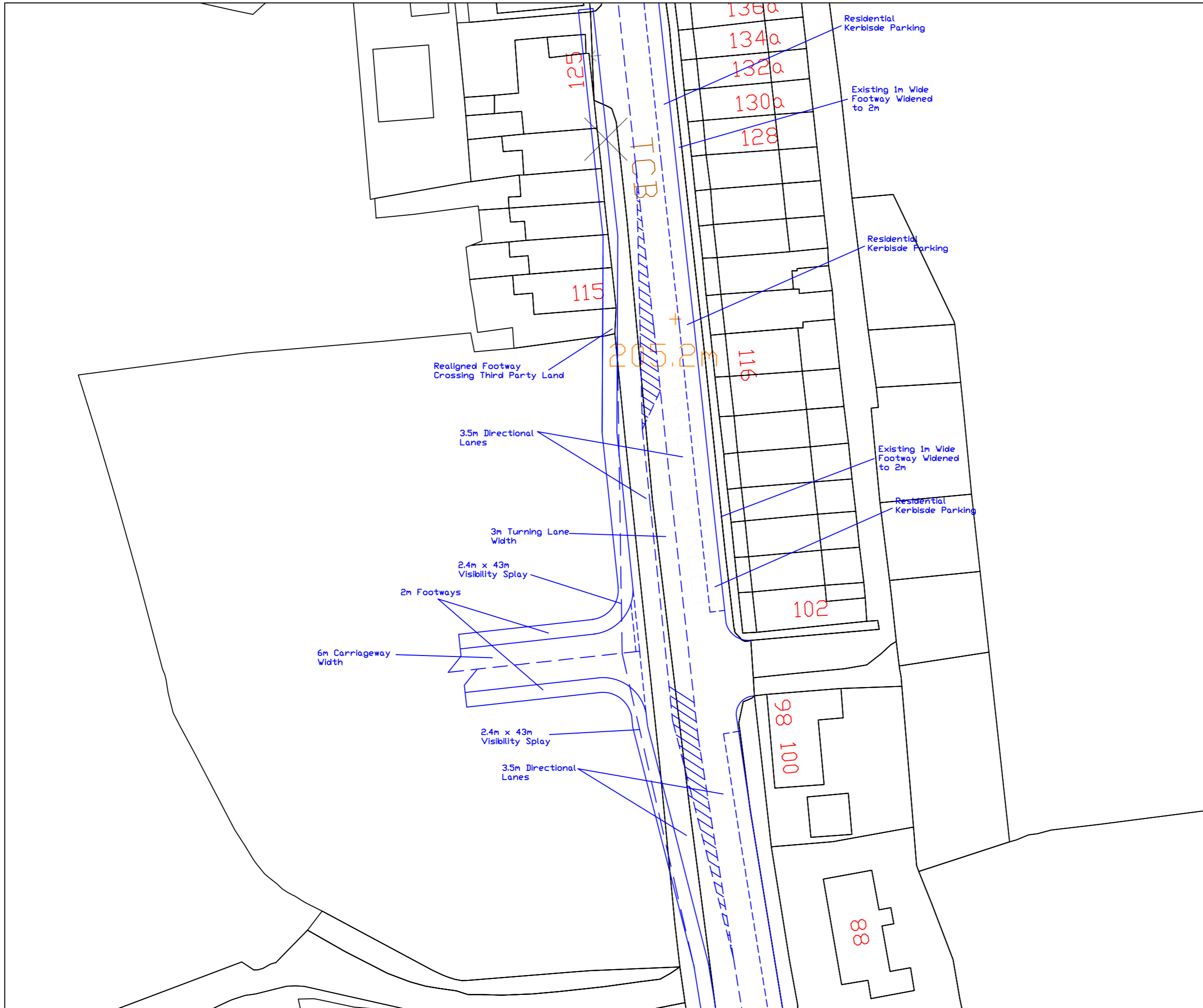
LOCATION: MARKET STREET

Direction: SOUTHBOUND

VEHICLE CLASSIFICATION				
	CAR / LGV / CARAVAN	OGV1 / BUS	OGV2	TOTAL
27-Jun-19				
7-19	2849	107	6	2962
6-22	3393	122	8	3523
6-24	3473	124	8	3605
0-24	3556	126	8	3690
28-Jun-19				
7-19	3115	115	7	3237
6-22	3655	133	7	3795
6-24	3776	134	8	3918
0-24	3873	135	8	4016
29-Jun-19				
7-19	2448	93	3	2544
6-22	2843	107	3	2953
6-24	2965	109	3	3077
0-24	3051	109	4	3164
30-Jun-19				
7-19	2259	51	6	2316
6-22	2572	56	6	2634
6-24	2640	56	6	2702
0-24	2749	56	6	2811
1-Jul-19				
7-19	2967	94	6	3067
6-22	3450	108	6	3564
6-24	3517	108	6	3631
0-24	3593	111	6	3710
2-Jul-19				
7-19	3071	121	4	3196
6-22	3618	137	5	3760
6-24	3703	138	5	3846
0-24	3777	141	5	3923
3-Jul-19				
7-19	2934	111	11	3056
6-22	3499	128	11	3638
6-24	3598	129	11	3738
0-24	3671	130	11	3812
AVERAGE				
7-19	2806	99	6	2911
6-22	3290	113	7	3410
6-24	3382	114	7	3502
0-24	3467	115	7	3589



APPENDIX D



THIS DRAWING MAY BE USED ONLY FOR THE PURPOSE INTENDED AND ONLY WRITTEN DIMENSIONS SHALL BE USED

NOTES

Revision Details	By	Date	Suffix
	Check		

Drawing Number
 SK21941-06

Edenfield Capacity Study
 Drawing Title
 Market Street Junction
 Ghosted Right Turn
 Arrangement

Scale at A3
 1:500

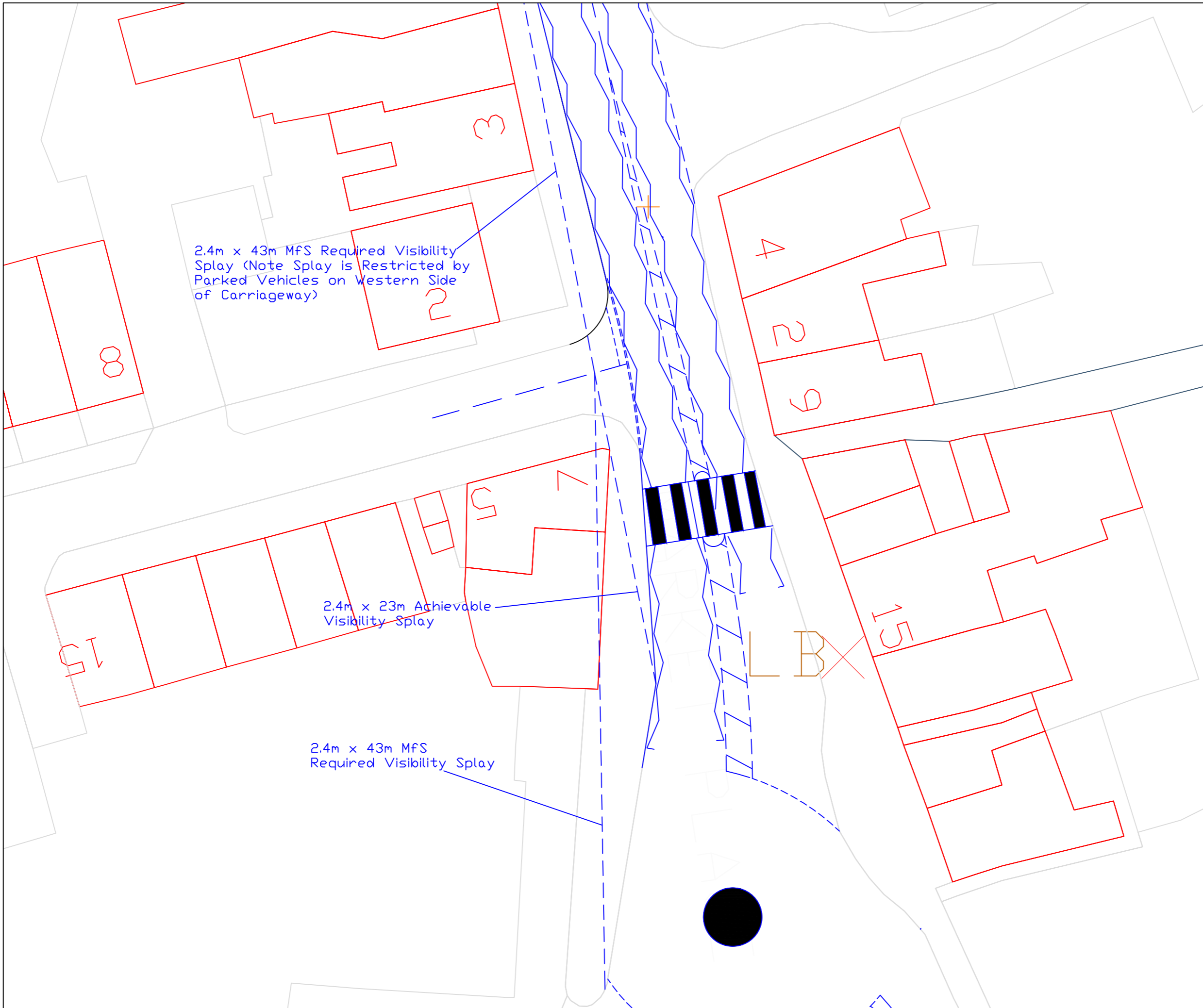
Drawn
 KAT
 Approved
 MAK

Check
 KAT
 Date
 08/08/19

SK Transport Planning Ltd
 Albion Wharf, 19 Albion Street
 Manchester M1 5LN
 Telephone (0161) 234 6509
 Fax (0161) 236 7959



APPENDIX E



THIS DRAWING MAY BE USED ONLY FOR THE PURPOSE INTENDED AND ONLY WRITTEN DIMENSIONS SHALL BE USED

NOTES

Revision Details	By	Date	Suffix

Drawing Number
 SK21941-01

Edenfield Capacity Study

Drawing Title
 Exchange Street Junction Visibility Splays

Scale at A3
 1:500

Drawn
 KAT

Approved
 MAK

Check
 KAT

Date
 26/07/19

SK Transport Planning Ltd
 Albion Wharf, 19 Albion Street
 Manchester M1 5LN
 Telephone (0161) 234 6509
 Fax (0161) 236 7959



Examination of the Rossendale Local Plan

Actions 15.1, 15.2 and 15.6 to 15.10 - New Employment Site Allocations (NE1 to NE5)

Representations by A. G. Ashworth and R. W. Lester about RBC's Paper dated January 2021 and published on 29th January 2021

Contents

Page 1 Key Points

Page 2 Representations

Key Points

- Ownership map information is incomplete and/or inaccurate. **NE2, NE3 and NE5**
- Lack of clear statement of intention to develop. **All**
- Lack of broad timescale for intended development. **All**
- Failure to specify required compensatory measures for Green Belt losses. **All except NE3**
- Point of, and details of, access not clarified. **NE2**
- Unresolved access issues. **NE3 and NE4**

Examination of the Rossendale Local Plan

EL8.015 Actions 15.1, 15.2 and 15.6 to 15.10 - New Employment Sites

Representations by A. G. Ashworth and R. W. Lester about RBC's Paper dated January 2021 and published on 29th January 2021

Representations

Note: paragraph numbers in this Response refer to those used in RBC's Paper.

NE1 Extension to Mayfield Chicks, Ewood Bridge

15.1 ii. Clear statement from landowners and any developers of intention to develop and broadly when

The letter at Appendix A, page 45, seems to have come from an associated company of the landowner, not the landowner as claimed on page 6.

"would probably" in that letter is hardly a statement of intent. No timescale is given.

15.1 iv. Specific development requirements, including compensatory measures for Green Belt losses where appropriate, and

15.6 i How Green Belt compensation is to be addressed

The compensatory measures have to be to the environmental quality and accessibility of remaining Green Belt land (NPPF, paragraph 138), but the second sub-bullet on page 9 is concerned with enhancement of land taken out of the Green Belt.

Such compensatory measures as are mentioned are not set out as paragraph 138, *ibid.*, requires, but are merely identified as subjects for consideration.

RBC were asked to include **specific development requirements**, including compensatory measures for Green Belt losses where appropriate, but have not done so.

NE2 Land north of Hud Hey, Haslingden

15.1 i Map showing land ownership

Ownership information is insufficient.

For most of the site the information is about cautioners. Whether the caution/s is/are against first registration or dealings is not stated. In any event that does not identify the owners.

The agent's email refers to owners Messrs Wrigley, but at a minimum full names are needed.

For part of the site no information at all is given.

Local authorities have statutory powers to serve requisitions for information about land ownership and are not limited to depending on Land Registry details.

15.1 ii Clear statement from landowners and any developers of intention to develop and broadly when

Timescale is not addressed in any detail.

Whether the existence of cautioners, who might dispute proposed dealings with the land, could delay development is not discussed.

15.1 iv. Specific development requirements, including compensatory measures for Green Belt losses where appropriate, and

15.7 ii How Green Belt compensation is to be addressed

The compensatory measures have to be to the environmental quality and accessibility of remaining Green Belt land (NPPF, paragraph 138), but the second sub-bullet on page 15 is concerned with enhancement of land taken out of the Green Belt.

Such compensatory measures as are mentioned are not set out as paragraph 138, *ibid.*, requires, but are merely identified as subjects for consideration.

RBC were asked to include **specific development requirements**, including compensatory measures for Green Belt losses where appropriate, but have not done so.

15.1 v Details of access - where from and what site-specific infrastructure would be required

The conclusion that access can be taken from Hud Hey Road subject to conditions and approval by the relevant authorities seems to under-estimate the difficulties. The fact is that nearly two years after Submission of the Local Plan neither RBC nor the owners/prospective developers have produced a satisfactory access scheme. Without the guarantee of an acceptable arrangement, the allocation of NE2 should be deleted.

15.7 i **Clarify** point of access is from Blackburn Road and **exactly what is required**

Fifteen months after the question was put RBC appear simply unable to answer.

NE3 Carrs Industrial Estate North Extension, Haslingden

15.1 i Map showing land ownership

The uncoloured areas of the site in Map 5 and the note at the top of page 21 show that RBC have not completed the job of discovering site ownership.

When the agent's letter refers to owner Mrs Joyce Barnes, there is no reason for RBC to ascribe ownership to "[Mr or Ms] Barnes".

The agent's reference to land owned by Mrs Barnes but in a Trust (Trustees: M. Schofield and A. R. Barnes) might suggest that only the Trustees are truly owners. It casts doubt on how exhaustive RBC's enquiries were.

It is not stated whether any details were verified with the Land Registry or whether statutory requisitions for ownership information were served.

15.1 ii Clear statement from landowners and any developers of intention to develop and broadly when

Mrs Barnes's agent's letter says the family want the land released for development but contains no statement of intent to do anything and certainly no timescale. Mr Downham's agent's letter says he would support development. Again there is no statement of intent to do anything and certainly no timescale.

15.1 iv. Specific development requirements, and

15.8.iv Address landscape and heritage concerns

Second bullet on page 27 requires a tree belt along the A56. Some of this planting is proposed for land of which no ownership details are provided (Map 5), raising the question of how such work can be lawfully carried out.

15.1 v. Details of access and where from and what site-specific infrastructure would be required

See Appendix B

15.1 vi High-level viability, particularly having regard to the proposed access arrangements

Because the works necessary to bring the site forward have not been ascertained, RBC have not provided and cannot yet provide the required high-level breakdown.

15.2 i High-level breakdown of necessary works which developers could not carry out

This has not been supplied. Further detailed investigation is needed to identify engineering works necessary for safe access from Commerce Street, and this is not expected until planning application stage.

15.8 i Clarify access is to be from Commerce Street

Highways England have agreed, but only in principle.

15.8 iii Confirm with Highways England that their land will be made available for development

This has been confirmed, but only in principle and subject to conditions.

NE4 Extension of New Hall Hey, Rawtenstall

15.1 ii Clear statement from landowners and any developers of intention to develop and broadly when

Eastern portion: According to Nolan Redshaw's letter relevant players are the owners (NR's clients), a local business (prospective purchaser and the strongest interest after over 12 months of marketing) and "two businesses", contacts with which the "purchaser" has been using. For its head office and main depot the local business would need approximately half the site, i.e., half of the portion of the site to the east of the River Irwell. There is hope, if not intent, of submitting a planning application for the site and access around the middle of 2021. There is nothing more about timescale. Proposals for the other half of this portion have not crystallised.

Western portion: The agent for the owners of the majority of the site between the river and the A682 wanted to discuss the parameters of an outline planning application.

The owner of the remaining land supports the allocation but says no more.

15.1 iii Overview of key constraints

"Strategic road network" is a well-known term, but RBC should clarify what they mean by "Strategic Transport Network" in the Green Belt paragraph.

15.1 iv. Specific development requirements, including compensatory measures for Green Belt losses where appropriate, and

15.9 iii How Green Belt compensation is to be addressed

The compensatory measures have to be to the environmental quality and accessibility of remaining Green Belt land (NPPF, paragraph 138), but of the bullets on page 39 and top of page 40 only the first and (possibly) the second are relevant in this context.

Such compensatory measures as are mentioned are not set out as paragraph 138, *ibid.*, requires, but are merely identified as subjects for consideration.

RBC were asked to include **specific development requirements**, including compensatory measures for Green Belt losses where appropriate, but have not done so.

15.1 v. Details of access and where from and what site-specific infrastructure would be required The possible impact of the development on the Rawtenstall Gyratory and New Hall Hey Road is mentioned but not assessed.

No assessment is made of whether access off Holme Lane would be acceptable, having regard to *inter alia* traffic to/from the development, width of Holme Lane, proximity to Townsend Fold level crossing (with or without the increased rail service RBC seek) and layout of Bury Road/Holme Lane junction.

NE5 Baxenden Chemicals Ltd, Rising Bridge

15.1 i Map showing land ownership, and

15.1.iii Overview of key constraints

Whilst RBC may consider it helpful to refer to the site by a company name that was changed on 12th June 2017, Map 10 and the Overview of key constraints should show the owner as Lanxess Urethanes UK Ltd, even if Land Registry records are out of date.

15.1 ii Clear statement from landowners and any developers of intention to develop and broadly when

There is a statement of intent, but the owner avoids any firm commitment or timescale.

15.1.iii Overview of key constraints RBC's paper does not allude to Green Belt amendment GB(Minor)40 which takes out of Green Belt some land included in this allocation.

15.1 iv. Specific development requirements, including compensatory measures for Green Belt losses where appropriate

RBC's paper does not allude to Green Belt amendment GB(Minor)40 which takes out of Green Belt some land included in this allocation. No specific requirements for compensatory improvements in the remainder of the Green Belt are specified.

RBC were asked to include **specific development requirements**, including compensatory measures for Green Belt losses where appropriate, but have not done so.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

Actions 15.1 and 15.3 to 15.5 - Mixed Use Site Allocations (M1 to M5)

Representations by A. G. Ashworth and R. W. Lester about RBC's Paper dated January 2021

Contents

Page 1 Key Points

Page 2 Representations

Key Points

- For Waterside Mill, Bacup the Actions are not addressed in sufficient detail or with clarity, particularly as regards ownership, viability (in view of poor condition and listed status) and timely deliverability
- No decision to CPO Waterside Mill has been taken, and there is no indication when, if at all, such a decision might be made
- RBC should take urgent action to acquire Waterside Mill and to ensure its residential redevelopment

Examination of the Rossendale Local Plan

Actions 15.1 and 15.3 to 15.5 - Mixed Use Site Allocations (M1 to M5)

Representations by A. G. Ashworth and R. W. Lester about RBC's Paper dated January 2021

Representations

Note: paragraph numbers in this Response refer to those used in RBC's Paper.

M1 Waterside Mill, Bacup

15.1 i Map showing land ownership and

15.3 i Note to clarify the ownerships and that constraints can be overcome. Provide evidence that the site is developable at the point envisaged in line with NPPF and PPG

RBC say (pages 3 and 4) the information that Vencray Ltd owns the property comes from the Land Registry. On the Companies House (England and Wales) website Vencray Limited (company number 4214727, registered office Rico House, George Street, Prestwich, Manchester) is listed as 'Dissolved 23/04/2013'. We therefore assume that that is the registered proprietor of Waterside Mill.

Quoting a Report to Cabinet on 14th March 2018 (paragraph 5.14), RBC acknowledge (page 6) that "Vencray Ltd went into liquidation several years ago" but add that "two individual trustees are cited in the title along with an LLP". It is not explained further which title is meant or what interest the trustees and LLP (all unidentified) have.

If the property was owned by Vencray Limited when that company was dissolved, it would have automatically passed as *bona vacantia* to the Crown. As the registered office was in Prestwich and the asset in Bacup, the matter would be dealt with by the solicitors to the Duchy of Lancaster, Messrs Farrer & Co. RBC do not clarify whether this possibility has been considered.

In short, the note does not clarify the ownerships at all. Nor does it provide evidence of developability at a future point.

15.1 ii. Clear statement from landowners and any developers of intention to develop and broadly when
There is no clear statement of intent from any person, including RBC.

15.3 ii. Preparation of a note which provides evidence the site is available and developable, to include cabinet report and what else the Council notes as being supportive towards the site being available and developable in years 6-10

The note reproduces information about a Valley Heritage scheme from paragraph 5.10 of the report to Cabinet (14th March 2018). Since then the property has suffered fire, partial collapse and partial demolition. The current relevance of that scheme is therefore questionable.

The site is not available to the Council, there is no up-to-date evidence of developability, and nothing to support the possibility of development in Years 6-10.

15.3 iii. Update on Compulsory Purchase Order

No details are provided under this heading, but limited information is given under 15.3 i.

The Cabinet on 14th March 2018 approved the process of making of a compulsory purchase order (CPO) but did not pass a resolution actually to make one; the report was clear that there would be no CPO without a Heritage Lottery Fund commitment to grant up to £250,000.

It is unclear what “legal proceedings” are being investigated by RBC (pages 6 and 24) to bring the site into RBC ownership. It is unacceptably vague and begs the questions “exactly what is being investigated?”, “what form is the investigation taking”, “why is the investigation not complete?” and “the obvious way to acquire the property is by a CPO, so why are legal proceedings being investigated at all?”

We would summarise the CPO update as follows:

- No decision to make a CPO has been made.
- There is no indication when, if at all, any such decision might be made.

Waterside Mill continues to deteriorate and detract from the Town Centre Conservation Area. It cries out for an urgent pro-active approach from RBC by acquiring the site and incorporating the remains into a residential development. The Director of Economic Development confirms (Appendix A) that 39 units can be accommodated. The risks of not taking action were set out at paragraph 4.1 of the Cabinet report in March 2018, nearly three years ago.

M2 Spinning Point, Rawtenstall

15.1 ii Clear statement from landowners and any developers of intention to develop and broadly when
RBC might have addressed here the designation of part of the site as an extension to the Primary Shopping Area.

M3 Isle of Man Mill, Water

15.1 i Map showing land ownership

Information about the leaseholders might be relevant and should have been supplied.

15.1 ii Clear statement from landowners and any developers of intention to develop and broadly when

It is wrong to say Brother Investments [Limited] is also known as B & E Boys Ltd. They are associated companies and two distinct entities.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

EL8.015 Action 15.1 Appendix E – Employment Viability Note

Representations by A.G.Ashworth and R.W.Lester about Keppie Massie Paper and CoStar
Report dated 22 January 2021

Contents

Page 1 Key Points

Page 2 Representations

Key Points

- Speculative development is not viable; some industrial /commercial development will emerge from sources motivated by existing owners, close to the A56/M66 corridor and would be assisted by public sector funding. (Refer to section R1 below)
- Total Employment Land Requirement would be 10.5 ha for the 15 years of the Plan. (Refer to Tables 1 and 2 below)
- Policy EMP 3 needs to be reviewed, it is too restrictive and prevents sites that are no longer fit for purpose and located in areas away from the Strategic Road Network being allocated for other uses including residential. (Refer to section R3 below)
- No ground for asserting that owners of sites NE1 and NE5 *will* use vacant land to expand their businesses. (Refer to section R4 below)
- Over-optimistic prediction of delivery of site NE2 - ownership and access issues. (Refer to section R5 below)

Examination of the Rossendale Local Plan

EL8.015 Action 15.1 Appendix E – Employment Viability Note

Representations by A.G.Ashworth and R.W.Lester about Keppie Massie Paper and CoStar Report dated 22 January 2021

Representations

R1 Summary of Keppie Massie Paper (KMP)

R1.1, From KMP, paragraphs 1.0 to 11.0 and 14.0, the following points emerge:

- Speculative commercial developments are not viable for locations like the Rossendale Borough. (Refer to paragraphs 1.0, 5.0 and 6.0)
- Some industrial and commercial development will come forward but likely from sources motivated by existing owners wishing to expand or business agglomeration. (Refer to paragraphs 2.0, 5.0, 7.0, 9.0, 11.0, and 14.0)
- New development is likely to come forward with the benefit of public sector funding or possibly as part of a wider mixed-use scheme. (Refer to paragraph 5.0)
- The growth is likely to come forward close to the A56/M66 corridor. (Refer to paragraphs 5.0, 8.0, and 14.0)
- Projected growth per annum is 0.12ha giving a total of 1.81 ha over 15 years. (Refer to paragraphs 9.0 and 10.0; see also Table 1 below)

R2 Supply and Demand Trends – Keppie Massie from RBC Response to Action 8.015.1

R2.1 Table 1 below shows trends in overall supply of and demand for employment land. It is based on information at page 13 of the CoStar report annexed to KMP (nineteenth page of response to Action 15.1 Appendix E).

Table 1: Supply and Demand Trends – Keppie Massie from RBC’s Response to Action 8.015.1

Year	Growth Square feet	Growth Square metres	Growth Ha	Annual Average	15 Year Requirement
Projected Growth:					
2025	16307	1515	0.15		
2024	16463	1529	0.15		
2023	15604	1450	0.14		
2022	13421	1247	0.12		
2021	3038	282	0.03		
Totals	64833	6023	0.60	0.12	1.81
Previous 5 Years:					
2020	56995	5295	0.53		
2019	19246	1788	0.18		
2018	0	0	0.00		
2017	5332	495	0.05		
2016	0	0	0.00		
Totals	81573	7578	0.76	0.15	2.27

R2.2 Based on a Growth figure of 1.81ha for the 15 years of the Plan we can calculate the Employment Land Requirement as 10.6 ha for the Plan Period, as shown in Table 2 below.

Table 2: Calculation of Employment Land Requirement

Growth: Keppie Massie	Land Losses* Refer To ECNF-ELR 6.1	Safety Buffer**: See below	Total Requirement for Plan Period of 15 Yrs
1.81ha	8.39ha	0.3ha	10.5ha
The Land Loss figure was updated on 08.03.21 when checked against the current Plan. This figure of 10.5ha confirms our original calculation in EL 2.066i of 10.72ha which was based on the Experian data.			

*The Land loss figures and the supporting data will be attached to this response to AP 8.005.2.

**The Safety Buffer figure is calculated by taking the average of the last five years completion figures in the Keppie Massie document on Supply and Demand Trends.

R3 Comment on Policy EMP3

R3.1 The comments from Keppie Massie and Experian clearly identify that the Employment Land Growth requirements will be limited and centred in areas close to the Strategic Road Network. This effectively means that Policy EMP 3 needs a complete review as it is far too restrictive and will prevent employment sites that are no longer fit for purpose, located in areas away from the Strategic Road Network and failing to attract new tenants, being redeveloped and allocated for other purposes including residential.

R4 No basis for KMP prediction of use

R4.1 KMP, Paragraph 12.0 states:

*“ . . . The Councils sic explanatory note shows that in a number of cases the employment land will be used by the landowner for the expansion of their existing business. These allocations include:
NE1 – Extension to Mayfield Chicks, Ewood Bridge
NE5 – Baxenden Chemicals Ltd, Rising Bridge”*

We take ‘The Councils explanatory note’ to mean RBC’s paper **EL8.015 Actions 15.1, 15.2 and 15.6 to 15.10 - New Employment Sites**.

R4.2 Actually, the RBC paper does not show that sites NE1 and NE5 **will** be used for expansion of an existing business.

- In the case of NE1 Extension to Mayfield Chicks, Ewood Bridge the supposed clear statement from the landowner actually came in a letter from an associated company, and the phrase “would probably” in that letter is hardly a statement of intent or guarantee of how the land will be used. It gave no timescale for development. Even if development were proposed, it might be otherwise than for the purposes of the existing business.
- In the case of NE5 Baxenden Chemicals Ltd, Rising Bridge the owner avoided any firm commitment or timescale.

R5 KMP requires clarification

R5.1 KMP, Paragraph 13.0 states about allocation NE4:

“The allocation NE4 which is the extension of New Hall Hey is being actively promoted by the landowner’s agent and the information provided to the Council suggests that a local business is interested in acquiring the site for owner occupation to construct a new national office and depot.”

R5.1.1 It must be made clear that, as stated in the RBC paper, the local business referred to in KMP is interested in acquiring only the eastern part of the site.

R5.2 KMP, Paragraph 13.0 continues, about allocation NE2:

“Similarly it appears that in relation to allocation NE2 Land North of Hud Hey, Barnfield construction sic have reached preliminary agreement with the landowner to develop the site. Given the experience Barnfield have in developing new employment sites in Rossendale and the wider area where similar market conditions exist, they are familiar with the viability challenges in the area and the solutions to ensure delivery. If the agreement with Barnfield is progressed, the site will in all likelihood be delivered.”

R5.2.1 That part of paragraph 13.0 is over-optimistic. It must be read subject to two qualifications: First, the ownership information about site NE2 in the RBC paper is insufficient. For most of the site the information is about cautioners. Whether the caution/s is/are against first registration or dealings. is not stated. In any event that does not identify the owners. An agent’s email refers to owners Messrs Wrigley, but does not give full names. For part of the site no information at all is given.

R5.2.2 It is therefore strange for KMP to claim that Barnfield Construction have reached an agreement with “the landowner”, when seemingly there is more than one ownership and RBC have not identified any of the relevant parties.

R5.2.3 The second qualification is that, to present a balanced picture, KM need to acknowledge the access problem. The Inspectors asked, ‘Details of access - where from and what site-specific infrastructure would be required?’ The answer was that access can be taken from Hud Hey Road subject to conditions and approval by the relevant authorities. That heavily qualified statement is no doubt correct but it seems seriously to under-estimate the difficulties. The fact is that nearly two years after submission of the Local Plan neither RBC nor the owners/prospective developers have produced a satisfactory access scheme. There is no guarantee that an acceptable arrangement will be reached.

R5.2.4 The Inspectors asked also, **Clarify** point of access is from Blackburn Road and **exactly what is required**. Some fifteen months after the question was put RBC appear simply unable to answer.

R5.2.5 In these circumstances, progressing any agreement for development of NE2 looks doubtful, let alone delivering the site.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum
19th March 2021

Examination of the Rossendale Local Plan

Action 8.019.4 – Site at Manchester Road and Clod Lane, Haslingden

Representations by A.G. Ashworth and R.W. Lester regarding RBC's Undated Paper

Contents

Page 1 Key Points

Page 2 Representations

Key Points

- **RBC acknowledge the extant planning consent**
- **The consent is a material consideration to which RBC give substantial weight**
- **RBC accept that the site could yield at least 50 dwellings**
- **Dwellings could be delivered in Years 1 to 5 of the Plan**
- **Subject to further survey, RBC might increase site capacity**

Examination of the Rossendale Local Plan

Action 8.019.4 – Site at Manchester Road and Clod Lane, Haslingden

Representations by A.G. Ashworth and R.W. Lester regarding RBC's Undated Paper

Representations

We reproduce below the restrictions which RBC would impose on including the site in the housing land supply and their conclusions:-

4.15 The extant planning permission (ref. 13/2/2758) is a material consideration which the Council gives substantial weight in the planning balance for any future development proposal relating to the site.

Considering the extant permission could still be implemented in the areas deemed potentially suitable for development, as set out in the Report, the Council does consider the inclusion of the site in the housing land supply to be appropriate subject to the following:

- A planning application is submitted for a residential scheme within two years of the emerging Local Plan being adopted;*
- The site area covered by the prospective planning application is restricted to the revised site area for the site, as shown on Figure 4, which is based on the evidence submitted by DPP; and*
- The capacity of the site is limited to no. 50 units. This capacity is based on the revised net developable area of approximately 1.68ha and a density of 30 dwellings per hectare.*

4.17 Subsequent to the Local Plan being adopted, if evidence is submitted as part of a future planning application in support of a greater area of the site being developed for residential use than that shown on Figure 4, then the Council may consider amending the capacity of the site.

5 Conclusion 5.1 Overall, the Council does not dispute that the extant planning permission relating to the site could still be implemented, however, it is clear based on the evidence submitted that the original permission could not be fully built-out in light of the geological constraints on site. With reference to the findings of the Report carried out by WML Consulting, the Council accepts part of the site could be suitable for residential development subject to detailed investigation and assessment. Consequently, the projected capacity of no. 50 units will be included in the Council's housing supply.

We comments as follows:

- 1) We note the Council agrees to a figure of 50 dwellings on the parts of the land considered to be suitable but we cannot understand why it then omits the 50 dwellings from the Five Year Housing Supply List when the Landowners have provided a schedule confirming the site build out by 2024.

- 2) We also note the Landowners' Consultant highlights that in the interim period of almost 50 years following the initial development of the site building techniques have improved dramatically and costs that were previously considered prohibitive can now be absorbed.

- 3) We also note in Paragraph 4.17 that the Council are willing to review the number of dwellings proposed for the entire site as and when a full geological survey has been carried out.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

Action 8.019.8 – Note on Developable Sites

Representations by A.G.Ashworth and R.W.Lester regarding RBC's Paper dated 3rd February 2021

Contents

Page 1 Key Points

Page 2 Representations

Key Points

- **RBC's Note highlights a relatively small number of changes in the Housing Land Supply figure, positive and negative, with a net difference of only 41 from the October 2019 Update. (Refer to page 7)**
- **It is disappointing that RBC have not included the Planning Approvals since 1st April 2019 as these would have highlighted a significant uplift. (Refer to page 7)**
- **The Open Space Assessment had very little effect with just one site being lost. (Refer to page 7)**
- **We welcome RBC's proactive approach to work with Landowners/Developers to consider obstacles to bringing forward sites for development and to identify solutions to constraints and suggest they use the same approach when re-examining the Alternative Sites list submitted with our Response to Action 8.008.7.**
- **In total we have identified more than twice the target number of dwellings without resorting to the use of Green Belt. Therefore all sites proposed in Green Belt should be removed from the Plan. (Refer to page 8)**
- **A similar situation exists with Employment Land where again supply is more than twice the requirement. (Refer to page 8)**

Examination of the Rossendale Local Plan

Action 8.019.8 – Note on Developable Sites

Representations by A.G.Ashworth and R.W. Lester regarding RBC’s Paper dated 3rd February 2021

Representations

We have carried out a composite overview of the current position with regard to all the allocation sites based on the comments made by RBC in their response to this Action Point and collated all the data in the Table below:

Site Ref.	Submiss’n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
H1	64	64	64		1-6 yrs	xx		0
H2	11	11	11		1-5 yrs			0
H3	19	19	19		1-5 yrs			0
H4	30	30	26*		6-10 yrs		Boundary revised to only include RBC.	-4
H5	47	47	47	13.04.20	1-5 yrs	Pre-App	No reduction for Open Space (OS) required.	0
H6	5	5	5	04.09.19	6 – 10 yrs		No start date provided. RBC est. 6-10 yrs.	0
H7	10	10	10	17.08.20	6 – 10 yrs		All land is RBC’s. OS overridden.	0
H8	9	9	9	05.02.20	6 – 10 yrs		RBC claim avail & suitable.	0
H9	31	9	9				Built out 2019/20.	0
H10	7	7	7	17.08.20	6 – 10 yrs		Land is RBC’s. No OS required.	0
H11	70	65	65				In construction.	0
H12	110	97	110				In construction, capacity now 110.	+13

Site Ref.	Submiss'n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
H13	95	92	92				RBC no comment, probably in construction.	0
H14	26	26	26	15.04.20 22.08.20	6 – 10 yrs		RBC-available & suitable.	0
H15	10	5	0				Landowner does not want to release.	-5
H16	18	18	18	07.08.19	11-15 yrs		RBC-Available & Suitable. No loss to OS	0
H17	7	7	7	09.06.20	1-5 yrs	Planning Approval	Planning Approval 06.01.20.	0
H18	25	25	25	23.02.21 25.02.20.	6 – 10 yrs		RBC available & suitable.	0
H19	7	7	7	26.08.20.	11-15 yrs		RBC available & suitable.	0
H20	16	16	16		1-5 yrs		RBC makes no comment.	0
H21	13	22	22		1-5 yrs		RBC makes no comment.	0
H22	22	22	22				RBC makes no comment.	0
H23	9	9	9		1-5 yrs		RBC makes no comment.	0
H24	7	7	7		1-5 yrs		RBC makes no comment.	0
H25	41	41	41		6 – 10 yrs		RBC-Available & suitable.	0
H26	26	24	24		1-5 yrs.		RBC makes no comment	0
H27	5	5	5		6 – 10 yrs		RBC confident of delivery	0
H28	63	63	63		1-5 yrs		RBC makes no comment, refer to A.P 8.010.1.	0

Site Ref.	Submiss'n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
H29	84	71	71		1-5 yrs		RBC no comment, refer A.P. 10.2. No OS requirement.	0
H30	51	51	33	25.07.19 13.09.19	6 – 10 yrs	Outline Approval	Refer A.P. 10.3. Possibility of more from other two SHLAAs later.	-18
H31	10	10	10	11.03.20	6 – 10 yrs		RBC Available & suitable.	0
H32	10	14	14				RBC makes no comment.	0
H33	63	63	63				RBC makes no comment.	0
H34	17	17	17	17.08.20	6 – 10 yrs		RBC – Available & suitable, no OS requirement	0
H35	22	22	22	Feb. 2020	11-15 yrs	?	RBC to review with Inspectors, access OK but flood concerns.	0
H36	9	9	9	14.05.20	6 – 10 yrs		RBC-Available & suitable. A.P. 10.5 confirms Owners intentions	0
H37	63	63	63		6-10 yrs		RBC to work with LCC to retain for development	0
H38	6	6	6		1-5 yrs		RBC makes no comment.	0
H39	151	82	94		1-10 yrs		Refer AP 10.7. RBC expects site to be developed.	+12

Site Ref.	Submiss'n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
H40	53	53	72		1-5 yrs		2 separate schemes, 1 for 29 and 1 for 43. Refer AP 10.8.	+19
H41	46	46	0				Removed for OS	-46
H42	52	52	52		6-10 yrs		RBC / Landowners to address constraints.	0
H43	10	10	10	15.04.20 25.08.20	6-10 yrs		Part of site available will provide 10.	0
H44	46	46	46		1-5 yrs		RBC makes no comment on this site.	0
H45	8	8	8		1-5 yrs		RBC makes no comment on this site.	0
H46	8	8	8		6 – 10 yrs	06.03.20	RBC / Landowners to address constraints.	0
H47	22	22	22	02.09.19	6 – 10 yrs		RBC-Available & suitable. Refer to AP 11.1. No OS requirement.	0
H48	13	13	13	10.03.20	6 – 10 yrs		RBC site available & suitable.	0
H49	5	5	5	17.08.20	6 – 10 yrs		RBC site available & suitable. No OS requirement.	0
H50	30	30	30		6 – 10 yrs		RBC / Landowners to address constraints.	0

Site Ref.	Submiss'n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
H51	6	6	6		6 – 10 yrs		RBC / Landowners to address constraints.	0
H52	30	30	30		1-5 yrs		Refer to AP 11.3. Looks likely to go ahead.	0
H53	21	0	0				Completed before 01.04.19.	0
H54	6	6	6	08.08.19	6 – 10 yrs		RBC makes no comment on this site	0
H55	11	11	11	08.08.19	6 – 10 yrs		Boundary revised-RBC confident of delivery.	0
H56	5	5	5		6 – 10 yrs		RBC / Landowners to address constraints.	0
H57	7	7	7	17.08.20	1-5 yrs		Owned by RBC. No OS reduction.	0
H58	9	9	9	15.04.20	6-10 yrs	.	RBC Available & suitable. No OS requirement.	0
H59	80	95	95		1-5 yrs	Approved 11.12.91	Material start on this site	0
H60	80	80	80		1-5 yrs	30 in constr.	RBC makes no comment.	0
H61	9	9	9	17.08.20	6 – 10 yrs		RBC- Available & suitable. No OS requirement.	0
H62	8	8	8	14.05.20	6 – 10 yrs		RBC to engage with Landowners.	0

Site Ref.	Submiss'n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
H63	5	5	0				Landowner no longer wants to develop	-5
H64	23	23	23	22.04.20	6 – 10 yrs		1 Landowner committed-Review with Inspectors. Refer to AP 12.5, positive & possibly additional opportunities.	0
H65	49	49	85		1-5 yrs	Approval Granted	Refer to AP 13.1.	+36
H66	5	5	5	14.05.20	6 – 10 yrs		RBC –Available & suitable	0
H67	28	0	0				Completed before 01.04.19.	0
H68	111	119	119		1-10 yrs		RBC makes no comment.	0
H69	20	20	20	18.02.20	6 – 10 yrs		RBC-Available & suitable.	0
H70	45	45	30		1-5 yrs		Refer to AP 14.1.	-15
H71	9	9	9	02.02.20	1-5 yrs		RBC- Available & suitable. Refer AP 14.2.	0
H72	400	400	400				Refer AP 14.3	0
H73	47	47	47	14.08.20	1-5 yrs		Refer to AP 14.4. RBC – Available & suitable.	0
H74	174	148	148		1-10 yrs		RBC makes no comment on this site.	0
M1	39	39	39		6 – 10 yrs		CPO & develop.	0
M2	28	28	0				Cancelled	-28

Site Ref.	Submiss'n Version Yield	2019 HLS EL4.014 Yield	2021 Update Yield	Owners Conf & Date	Latest Delivery Time-scale	Evidence for Start Date	Comments	Change from 2019 HLS
M3	16	16	16	31.08.19 08.08.19 17.11.20 06.11.20	6 – 10 yrs		RBC Available & suitable.	0
Totals-	2853	2682	2641					-41

Red: Denotes sites removed following Open Space Assessment.

Blue: Denotes sites removed due to Landowners no longer interested in developing.

Green: Denotes sites with boundary changes where one Landowner not interested in developing.

Purple: Denotes sites where Owners have not recently engaged with RBC.

Comments:

We have removed all dwellings from the sites RBC consider to be questionable and amended the total numbers of dwellings available. There was only a relatively small change in consequence of the Open Space Assessment with only one site being lost. The difference in numbers in comparison to the October 2019 update (**EL4.014**) is small involving overall only 41 dwellings. It is disappointing that RBC did not produce a list of approvals for the period from the 1st April 2019 up to the present time as this is a very significant figure.

Conclusions:

The overall housing supply is extremely healthy, the Housing Trajectory and Committed Site lists have proved to be very robust and we have the additional site approvals from the 1st April 2019 to the end of February 2021 also available.

If we then include the allowances for small sites, empty homes and the town centre regenerations we have close to 600 excess homes over the target of 3180.

This figure is sufficient to allow for the removal of all the developments proposed for Green Belt land in line with the NPPF guidelines.

In addition to this we have identified 2760 homes on non Green Belt land that have been approved by a Local Chartered Town Planning Expert and an annual supply from large windfall sites which creates a minimum of 50 dwellings per annum which could be used to provide a further safety buffer. In total this means we have more than twice the target number without resorting to the use of Green Belt land.

The situation with respect to employment land is very similar; the requirement for the total plan period has been calculated using both the Lichfields/Experian methodology and the Keppie Massie approach with both giving very similar results of 10.5 and 10.72ha. With the most recent supply reported by RBC at 23.59ha (which is questionably low) there is still more than double the target requirement.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum.

19th March 2021

Examination of the Rossendale Local Plan

Action 8.020.1 - Monitoring Framework

Representations by A. G. Ashworth and R. W. Lester about RBC's Undated Paper published on 29th January 2021

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Key Points

- RBC's monitoring proposals refer frequently to production of a Monitoring Report each year, but their historic production of such a document has been sporadic or non-existent, casting doubt on their competence to produce promised Reports in a timely manner. **Paragraphs 1.2 and 1.3**
- RBC should explain how they have been complying with their duty to report at least annually on conditions within their area since 31st March 2014. **Paragraph 1.3**
- RBC imply there will be no Monitoring Report for 2018-19 and 2019-20. **Paragraph 1.4**
- Except in paragraphs 8.2 and 10.1 RBC persistently refer to the Annual Monitoring Report, although from 2015 the correct term has been Authority Monitoring Report.
- The 2019 Five Year Housing Land Supply Report is well overdue, casting doubt on RBC's competence to produce future annual Reports in a timely manner. **Paragraph 2.9**
- Both in RBC's paper and on their website the information about Neighbourhood Planning is out of date. **Paragraphs 5.1 to 5.3**
- In **Table 1**, many of the cells are blank. In others the meaning of the insertions is unclear or ambiguous. for some of the Policies the proposed monitoring is inadequate.
- Further confusion is caused in **Table 1** by references to the Use Classes Order as it was before being amended over four months previously.

Examination of the Rossendale Local Plan

Action 8.020.1 - Monitoring Framework

Representations by A. G. Ashworth and R. W. Lester about RBC's Undated Paper published on 29th January 2021

Representations

Preliminary

P.1 The paragraph numbers below correspond with those in RBC's paper.

1 Introduction

1.2 This paragraph needs to explain the transition from Annual Monitoring Reports to Authority Monitoring Reports and explain the interval at which RBC now publish these and why their Monitoring Reports are no longer annual.

1.3 According to the RBC website, since the Annual Monitoring Report for 2013-14, there have been only two Authority Monitoring Reports, one covering three years 2014-17 and one for 2017-18. Paragraph 1.3 needs to explain how RBC have been complying with their duty to report at least annually on conditions within their area since 31st March 2014.

1.4 This states, "the next full AMR [is] due to report on the period 2020-21". Assuming that the RBC website lists all the Monitoring Reports, we are concerned to note that, notwithstanding statutory requirements, there is no intention to produce a Monitoring Report for 2018-19 and 2019-20.

1.7 "is" should be "are".

2 Housing Monitoring

2.4 Although said to have been identified as a trigger point, the second bullet is not reproduced as a Trigger in Table 1.

2.7 Should "housing falls" be "housing delivery falls"?

2.9 This refers to "the annual Five Year Housing Land Supply report" with a link to the relevant website page. This lists five reports, for 2015, 2016, 2017, 2018, and 2020 published respectively in August 2015, March 2017, May 2017 and March 2019 and on 10th March 2021. There is no mention of a Report for 2019/20 - 2023/24 which is now well overdue. We therefore have no confidence that the annual Five Year Housing Land Supply report is going to be published on a regular timely basis.

3 Economic Development Monitoring

3.1 “Annual” should read “Authority”. It is disingenuous of RBC to claim they “will **continue** (our emphasis) to monitor . . . through the preparation of the [AMR]”, as no such reports have appeared since the one for 2017-18 (please refer to comments above about paragraphs 1.2, 1.3 and 1.4). We have no confidence that they will begin to prepare a Monitoring Report on an annual timely basis.

3.2 “for why” should read “why”.

3.3 The meaning of “to” in the penultimate line is unclear.

4 Duty to Cooperate

Hyphen needed in heading.

4.2 We have no confidence that RBC will prepare a Monitoring Report on an annual timely basis (please refer to comments above about paragraph 3.1).

5. Neighbourhood Planning

This section is thoroughly inadequate, as noted below. It should state the position as at January 2021, not as it was nine months previously.

5.1 We have no confidence that RBC will prepare a Monitoring Report on an annual timely basis (please refer to comments above about paragraphs 3.1 and 4.2).

5.2 The paragraph states,

“Following the required consultation procedure, the Council designated Edenfield Community Neighbourhood Forum (ECNF) as the forum for this Neighbourhood Plan, also with their Neighbourhood Plan area in 2018. ECNF have recently undertaken informal consultation, including an open day, on their proposed Neighbourhood Plan. This is continuing to be progressed. Further information can be found here:

https://www.rossendale.gov.uk/info/210148/local_plan/10813/neighbourhood_plans/3

A draft has been submitted to the Council and comments provided to ECNF.”

To clarify, following information gathering and a number of informal consultation events during 2018 and 2019, a draft Neighbourhood Plan was prepared, which was shared with residents, businesses and resident landowners at an open day on 29th February 2020, and with non-resident landowners at an event in March 2020. Edenfield Community Neighbourhood Forum (ECNF) then submitted a draft Neighbourhood Plan to RBC electronically in April 2020 with associated reports and a request for a decision on whether a screening assessment was required. This was sent electronically on 7th April 2020, and hard copies were delivered on 24th April 2020. It took until late September 2020 for RBC to notify ECNF that a screening assessment was not required. It was not until 15th January 2021 that RBC’s comments on the draft Neighbourhood Plan were received. These are now being reviewed by ECNF and their consultants.

RBC’s website page about the Edenfield Neighbourhood Plan, to which paragraph 5.2 provides a link, is not up to date. All it says is

“Edenfield Neighbourhood Forum

Paragraphs 61F & 61G of the Town and Country Planning Act and The Neighbourhood Planning (General) Regulations 2012 Regulation 7(1) and 10(1)

In February 2018 Rossendale Borough Council received an application to designate a Neighbourhood Forum and associated Area of operation. A 6 week consultation was held between 23rd February 2018 and 19th April 2018 and 41 valid responses were received. There was one objection to the Forum and two to the proposed boundaries. The rest of the responses were in support.

In accordance with the above legislation, the Council designates Edenfield Community Neighbourhood Forum as the Forum for the Edenfield Neighbourhood Forum Area shown on the Map below for a period of 5 years until 22nd April 2023 in accordance with the documentation below:

[Map of the Area](#)

[Constitution](#)

[Name of contact - etc]

Designation as a Neighbourhood Forum means that Edenfield Community Neighbourhood Forum is classified as a “Qualifying Body” to prepare a Neighbourhood Plan for its area subject to all the relevant statutory consultation requirements. This has to be in general alignment with the Council’s Local Plan and if approved would form part of the statutory Development Plan for Edenfield.”

5.3 Again, the current position, not the one nine months ago, should be stated. This paragraph does not even state, as it claims to do, the position as at April 2020. It says that designation of the Bacup and Stacksteads Neighbourhood Forum is under determination, but it becomes apparent from the website link that it was designated from 16th April 2020.

6 Infrastructure Development Plan

6.2 We have no confidence that RBC will prepare a Monitoring Report on an annual timely basis (please refer to comments above about paragraphs 3.1, 4.2 and 5.1).

The information about the Rawtenstall Gyrotory in RBC’s response to Examination Action 7.2 is extremely limited, as noted in our representations thereon.

7 Supplementary Planning Documents (SPDs)

7.2 We have no confidence that RBC will prepare a Monitoring Report on an annual timely basis (please refer to comments above about paragraphs 3.1, 4.2, 5.1 and 6.2).

8 Monitoring Framework for the Rossendale Local Plan

8.2 We have no confidence that RBC will prepare a Monitoring Report on an annual timely basis (please refer to comments above about paragraphs 3.1, 4.2, 5.1, 6.2 and 7.2).

Table I We comment as follows:

Table I Strategic Policies SS, SD1 and SD2 and Policies HS1, HS2 and HS3. Again we reject the proposition that there are exceptional circumstances to justify the release of site H72 from the Green Belt.

Table I Policy HS1 “HDT results and consequences” is too vague to be meaningful.

Table I Policies HS3, HS4, HS5 and HS9 Paragraph 2.2 of RBC's paper states that trigger points and proposed action measures are identified in the Monitoring Framework, but neither are shown for these Policies.

Table I Policies HS12, HS13, HS14, HS16 and HS17, Paragraph 2.2 of RBC's paper states that indicators, targets and trigger points are identified in the Monitoring Framework, but none is shown for these Policies.

Table I Policies HS15, EMP4, EMP5, R3, R4, ENV7, ENV8, ENV10 and TR2 Paragraph 2.2 of RBC's paper states that targets, trigger points and proposed action measures are identified in the Monitoring Framework, but none is shown for these Policies.

Table I Strategic Policy EMP1 and Policy EMP2 These Policies grossly exaggerate the Employment land requirement, as we have repeatedly demonstrated during the Examination process. The Target of 1.8ha new employment floorspace provision *per annum* is consistent with the Policies but similarly exaggerated.

Table I Strategic Policy EMP1 and Policy EMP4 "BI" should read E(g)". No action measure is proposed.

Table I Strategic Policy R1 It is strange that a document published in January 2021, relating to an emerging Local Plan unlikely to be adopted before 31st July 2021, should refer to Use Classes as they were before the amendments effective from 1st September 2020. On a simple translation "A1, A2, A3, A4, B1a, D2" should be changed to "E(a), E(b), E(c), E(d), E(g)(i), F2(c), F2(d), drinking establishments, cinemas, music and concert halls, bingo and dance halls (but not night clubs) and gymnasiums", but it might be appropriate not to exclude night clubs and appropriate to mention here other *sui generis* uses such as theatres, launderettes, taxi businesses, amusement centres, casinos, betting offices and payday loan shops. It is not for the reader to guess - RBC really need to clarify what they mean.

It is not clear whether "approved/completed" is conjunctive or disjunctive or how double-counting at the completion stage will be avoided if the approval has already been counted.

It is not clear what RBC mean by "non-centres".

It is not clear where and how applications approved/completed within neighbourhood parades would be counted, i.e. as in other centres, in non-centres or in what?

Table I Policy R2 It is pointless to repeat the "Target" as the "Action required". The Action required must be a means which is conducive to achieving the Target.

Table I Policy R3 It is strange that a document published in January 2021, relating to an emerging Local Plan unlikely to be adopted before 31st July 2021, should refer to Use Classes as they were before the amendments effective from 1st September 2020. On a simple translation "A1, A2, A3, A4, A5" should be changed to "E(a), E(b), E(c), drinking establishments and hot food takeaways".

It is not clear whether "approved/completed" is conjunctive or disjunctive or how double-counting at the completion stage will be avoided if the approval has already been counted.

It is unclear whether the "Indicator" will include applications approved or completed within neighbourhood parades.

Table I Policy R4 It is strange that a document published in January 2021, relating to an emerging Local Plan unlikely to be adopted before 31st July 2021, should refer to a Use Class as it was before the Use Classes Order amendments effective from 1st September 2020. On a simple translation "A1" should be changed to "E(a)".

It is not clear whether “approved/completed” is conjunctive or disjunctive or how double-counting at the completion stage will be avoided if the approval has already been counted.

It is unclear whether the “Indicator” will include applications approved or completed within neighbourhood parades.

As noted in our response to Examination Action EL8.006.1 the proposed wording of Policy R4 is unsatisfactory. The relevant part of our response is

‘Page 31 Policy R4 wording

Use Class F.2(a) would seem to cover the ‘local shops’ contemplated by Policy R4. Reference to Use Class E(a) is therefore unnecessary and confusing.

Therefore further amend the policy text by deleting all the words in brackets except “Use Class F.2(a)” and by deleting “outside of the defined town, district and local centre or neighbourhood parade boundaries”.

If it is considered that some local shops fall outside Class F.2(a), then the term “local shop” should be clearly defined.’

Meaningful comment on how the Policy might be monitored cannot be made until the Policy itself is corrected.

Table 1 Policy R5 It is strange that a document published in January 2021, relating to an emerging Local Plan unlikely to be adopted before 31st July 2021, should refer to a Use Class as it was before the Use Classes Order amendments effective from 1st September 2020. The four references to “A5 use/s” should be changed to “hot food takeaways”

It is not clear whether “approvals/completions” is conjunctive or disjunctive or how double-counting at the completion stage will be avoided if the approval has already been counted.

The fourth bullet in the Policy as proposed by RBC to be modified is badly worded. We quote from our response to Examination Action EL8.006.1:

‘Page 32 Policy R5

The fourth bullet needs to be expressed, like the other bullets, as a criterion for supporting an application.

Whether Public Health England (PHE) actually classify the pupils, as the proposed wording states, is doubtful. PHE is responsible for national oversight of the National Child Measurement Programme and provides operational guidance: local authorities obtain relevant data and return them to NHS Digital; PHE publishes small area data at ward level.

Limitations on the data include: (i) a parent or carer may withdraw their child from the process and (ii) the data are sourced from state-maintained schools only, excluding private school pupils and home-schooled children.

It follows that it is essential to relate the criterion to the NCMP data.

We assume that “more than” is meant to apply to both percentages.

The fourth bullet should therefore be amended to read: “the proposed development is not in a ward where more than 15% of Year 6 pupils or more than 10% of Reception class age pupils are classified as obese according to National Child Measurement Programme data”.

Therefore the third Indicator should be “No. of *approvals/completions* [to be clarified] for hot food takeaways in wards where more than 15% of Year 6 pupils or more than 10% of Reception class age pupils are classified as obese according to National Child Measurement Programme data”.

The first Trigger is unclear. Is it comparing approvals (or should it be completions?) by period and, if so, what period. OR does it mean any approval would be a Trigger, as any individual approval would increase the total number of approvals? It seems that an approval with suitably restricted opening hours could be, or count towards, the Trigger, but where is the logic in that? The first Trigger should be re-worded.

The first Action might have a marginal effect. The second seems irrelevant.

Table I Policy R6 Paragraph 2.2 of RBC's paper states that targets and trigger points are identified in the Monitoring Framework, but none is shown.

Table I Strategic Policy ENVI (third row) "schemes" should be singular.

Table I Policy ENV2 This is inadequate, as it deals only with assets "at risk" and does not address how any other aspects of the Policy will be monitored.

Table I Policy ENV3

This Policy is good but impossible to reconcile with Policy HS3: Edenfield.

The problem with the Indicators is that the Policies Map does not show any area of land protected from development, or designated, for its intrinsic landscape character or visual amenity value.

More of the bullets in the Policy should be converted to Indicators.

The Target is unachievable if Policy HS3 remains,

The Actions are vague and unlikely to be effective.

Table I Policy ENV4

It is not clear what the Target "No net loss" refers to.

It is not clear how the Target "Net gains in biodiversity" will be measured.

The Indicators, Targets and Triggers rightly refer to SSSIs but ignore county level and locally designated sites.

The populations of the species referred to in Paragraphs 183 and 184 of the Policy Explanation could form a Data Source; maintenance of or increase in their populations could be a Target; reduced populations could be a Trigger.

Table I Policy ENV6 The proposed monitoring is inadequate, as it focuses exclusively on air pollution and ignores water, light, noise and odour pollution which the Policy also seeks to control.

Table I Policy ENV9 It is not clear how the respective increase and reductions will be measured.

Table I Chapter 5 heading. The purpose of including two Indicators against the heading rather than against a Policy is unclear.

Table I Policies LT5, LT6 and TR3 It is strange that RBC include Policies in the Local Plan but abandon any pretence of monitoring their effectiveness.

Table I Policy TR1

It is odd that "Year on year failure to meet timescales identified within IDP" should be a Target as well as a Trigger.

Table I Policy TR4

The Target is not clear. It could mean: by 2034 75% of new dwellings are required to be fitted with an electric vehicle charging point. It could mean: over a period of x years ending in 2034 75% of new dwellings will have been required to be fitted with an electric vehicle charging point. There may be other interpretations. Does it refer to approvals or completions? It is just too vague. If "Failure to condition" means "Failure to condition the provision of an electric vehicle charging point for each new dwelling approved", it should say so. Present wording is vague.

Table 2 Spelling of "Detached" requires correction.

10 Conclusion

10.1 We have no confidence that RBC will prepare a Monitoring Report on an annual timely basis (please refer to comments above about paragraphs 3.1, 4.2, 5.1, 6.2, 7.2 and 8.2).

Alan G.Ashworth and Richard W.Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

Examination of the Rossendale Local Plan

Observations of A.G. Ashworth and R.W. Lester on Examination Library Document EL6.016 (RBC Response re Use Classes Order Amendments of 2020 and Implications for the Emerging Local Plan)

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Key Points

- **Paragraph 1.1** RBC failed to ensure that the public were aware that they were preparing their paper
- **Policy EMP1** The exaggerated requirement for Employment Land must be reduced
- **Policy EMP1** based on incomplete audit of existing employment sites
- **Policy EMP2 Table 2** “A4, A5 or D2” should be replaced by specific uses, not just “sui generis”
- New **Policy R2** wording (page 8 of paper) allows all Class F.2, but page 5 would allow just F.2(b)
- Amended **Policy R3** contains errors and is unclear whether “centres” includes “neighbourhood parades”
- **Policy R4** needs re-drafting to align “local shop” definition with F.2(a)
- **Pages 115 - 120** of Submission Version Plan. Various errors and omissions in RBC’s Action Paper
- **Section 3 (Comments on Appendix A)** below lists in detail other required corrections

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Observations

Preliminary

The RBC document is dated 4th September 2020 but was not published until 20th January 2021.

1. Introduction

1.1 We learn from item EL6.016 that, when the Inspectors raised the question with RBC, they asked RBC to let them know when the document could be made available as it would need to be consulted on. RBC were told to make sure, once the timetable was established, that the matter was “briefly picked up on the latest news webpages so that people are aware that the matter is being considered”. The first reference to the matter on the Examination Latest News and Archived Latest News webpages is dated 19th January 2021. RBC have disregarded the Inspectors’ request and kept the public in the dark until surprising them with the release of the actual document.

1.2 The Inspectors’ queries stated, according to RBC, that Use Class B would no longer exist, but that is not entirely correct. B1 is replaced, but B2 and B8 continue, as EL6.016 explains at the top of page 3.

2. Comments on pages 2 to 5 of RBC’s Response

Page 2 “Use Class Order” should read “Use Classes Order”

Page 3 It is deeply regrettable that RBC have not taken this opportunity to address the erroneous figure of 27ha for the requirement for employment land over the plan period, quoted against Strategic Policy EMP1. The evidence in documents EL2.065d, EL2.066a, EL2.066i, EL6.001, EL6.012a and EL8.001.3, as well as our response to RBC’s paper on Action 5.2, confirm that that figure is greatly exaggerated.

Page 3 Policy EMP3 Given that RBC have identified more than double the land required for employment purposes, way in excess of the actual requirement, there is no need for Policy EMP3 at all.

Page 3 Policy EMP6 Delete “classes” where it first appears.

Page 3 Policy EMP7 “criteria” should read “criterion”

Page 4 “A4/5 uses . . . become defined as “Sui Generis.” This statement is incorrect: ‘sui generis’ is not a definition as such but a consequence of not falling within a defined use class.

Page 5 Strategic Policy R1 A spurious bracket appears before “E” in the proposed amended wording.

Page 5 Policy R2

- a) “Use Class Order” should read “Use Classes Order”.
- b) The word “previous” is inapposite: the Order remains that of 1987. Presumably RBC mean the Order as it was before the amendments of 2020.
- c) Delete hyphen in ‘sui-generis’.
- d) There is inconsistency here with the Main Modification for R2 proposed on page 8. Page 5 suggests re-wording to refer to Class E (all sub-classes), drinking establishments and Class F(2)(b) but the proposed Main Modification allows also local shops, swimming pools, skating rinks and outdoor recreation areas.

Page 5 Policy R4. We submit that new Use Class F.2(a) would seem to cover the shops at which this Policy is directed. Reference to Use Class E(a) is therefore unnecessary and confusing. If these two submissions are not accepted, then the Policy explanation needs to address the criteria by which shops falling outside F.2(a) would be regarded as local shops.

Page 5 Penultimate paragraph:

- a) To state without further explanation that “Other parts of the Local Plan . . . may need to be amended” is no answer to the request to explain whether any other parts need to be modified to reflect the changes to the Use Classes Order.
- b) “Class” should read “Classes”.

Page 5 Last paragraph: “policy” should read “policies”.

3. Comments on Appendix A - Proposed Main Modifications

EMP1 Page 49 Policy

It makes no sense to begin the Policy “The Council. Together . . .”

When “storage” is preceded by “or”, “B8” should likewise be preceded by “or”, not “and”.

As noted above, it is deeply regrettable that RBC have not taken this opportunity to address the erroneous figure of 27ha for the requirement for employment land over the plan period. The evidence in documents EL2.065d, EL2.066a, EL2.066i, EL6.001, EL6.012a and EL8.001.3, as well as our response to RBC’s paper on Action 5.2, confirm that that figure is greatly exaggerated. Correction is required.

EMP1 Page 50/Para 117 Explanation text

The equivalent of “B1” is “E(g)”, not “E(g)(i)”.

In the Submission version of the Plan paragraph 117 read:

The ELR has identified an overall adjusted current supply of 16.4ha (net) throughout Rossendale, from extant permissions, as well as existing and allocated employment space, having taken into account recommendations for de-allocations and release . . .

Without explanation the word “adjusted” has been deleted from the modified version in EL6.016.

The Tables at pages 89-97 of the ELR suggest a figure of 15.74ha, but any current supply figure in the ELR is likely to be understated because the ELR, being based on an incomplete audit of sites, is intrinsically flawed.

EMP1 Page 50/Para 118 Explanation text

“allocated” should read “allocate”

As noted above, it is deeply regrettable that RBC have not taken this opportunity to address the erroneous figure of 27ha for the requirement for employment land over the plan period. The evidence in documents EL2.065d, EL2.066a, EL2.066i, EL6.001, EL6.012a and EL8.001.3, as well as our response to RBC’s paper on Action 5.2, confirm that that figure is greatly exaggerated. Correction is required.

EMP2 Table 2 Page 51

Simply replacing “A4, A5 or D2” by “Sui generis” would allow any *sui generis* use. The actual uses to be allowed must be specified.

EMP2 Page 53/Para 120 Explanation text

As noted above, it is deeply regrettable that RBC have not taken this opportunity to address the erroneous figure of 27ha for the requirement for employment land over the plan period. The evidence in documents EL2.065d, EL2.066a, EL2.066i, EL6.001, EL6.012a and EL8.001.3, as well as our response to RBC’s paper on Action 5.2, confirm that that figure is greatly exaggerated. Correction is required.

R2 Page 66 Policy

Please refer to note above about Page 5 and Policy R2.

R3 Page 67 Policy

The term “these centres” is used three times, and “the centre” once, all in lower case, but even with the dubious benefit of comparison with the previous wording, there is ambiguity as to whether those terms cover Neighbourhood Parades.

In a), unless the widening of the types of development that will be permitted is deliberate, insert after “E”: “(a), (b), and (c)”

Also in a), delete the superfluous “for Pub and”.

In (c) amend “E” to “E(a)”, although the parenthesised words seem unnecessary, and hyphenate “12 month”.

R3 Page 68/Para 154 Explanation text

Insert after “E”: “(a), (b), and (c)”, unless the widening of the types of development that will be permitted is deliberate.

Delete “Sui generis uses such as drinking establishments” and replace with “drinking establishment uses (*sui generis*)”. RBC’s proposed wording is poor because it opens the door to other *sui generis* uses.

Reinstate “and” before “local”

It is unclear whether “the centres” or “the centre” is apt to include a Neighbourhood Parade.

R4 Page 68 Policy

Use Class F.2(a) would seem to cover the ‘local shops’ contemplated by Policy R4. Reference to Use Class E(a) is therefore unnecessary and confusing.

Further amend the policy text by deleting all the words in brackets except “Use Class F.2(a)” and by deleting “outside of the defined town, district and local centres or neighbourhood parade boundaries”

R5 Page 69 Policy

The amendment is in a list of criteria for approval but does not read as such.

Whether Public Health England (PHE) actually classify the pupils, as the proposed wording states, is doubtful. PHE is responsible for national oversight of the National Child Measurement Programme and provides operational guidance: local authorities obtain relevant data and return them to NHS Digital; PHE publishes small area data at ward level.

Limitations on the data include: (i) a parent or carer may withdraw their child from the process and (ii) the data are sourced from state-maintained schools only, excluding private school pupils and home-schooled children.

It follows that it is essential to relate the criterion to the NCMP data.

We assume that “more than” is meant to apply to both percentages.

The relevant bullet should therefore be amended to read: “the proposed development is not in a ward where more than 15% of Year 6 pupils or more than 10% of Reception class age pupils are classified as obese according to National Child Measurement Programme data”.

RBC OMISSION Page 115 Monitoring Employment Amend B1 to E(g)

RBC OMISSION Page 115 Monitoring Retail and Leisure Amend A1 to E(a)

Page 118 Amend to “Drinking establishments” from “drinking premises”, as the former was the description for Use Class A4.

Page 119 Amend “Nursery” to “Nurseries”

Page 120 Some “Other leisure buildings” would fall within F.2, but others would fall within E(d).

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

19th March 2021

19 March 2021
Delivered by email

Ms Anne Stora
Rossendale Borough Council
The Business Centre
Futures Park
Bacup
Rossendale
OL13 0BB

Ref: PEEM2067

Dear Ms Stora

**EMERGING ROSSENDALE LOCAL PLAN – RESPONSE TO CONSULTATION PERIOD ON EXAMINATION
LIBRARY 8: “SECOND TRANCHE” DOCUMENTS ITEMS ARISING FROM ACTION LIST EL6.001**

We write on behalf of our client Peel L&P (“Peel”) in respect of the ongoing Examination in Public (EiP) of the emerging Rossendale Local Plan.

Rossendale Borough Council (RBC) is currently undertaking a consultation exercise in respect of a “second tranche” of additional Local Plan evidence base documents published within Examination Library 8. These documents have been prepared by RBC in response to the Schedule of Actions (EL6.001) published by the examination Inspectors following the close of the hearing sessions, which were held between 24 September 2019 and 10 October 2019. This letter sets out Peel’s comments on those documents.

RBC and the examination Inspectors will be aware that Peel is promoting the release and/or allocation of the following sites for residential development:

- Land at Kirkhill Avenue and Moorland Rise, Haslingden (SHLAA ref 16395/Green Belt Parcel 13)
- Land at Burnley Road, Edenfield (SHLAA ref 16258/Green Belt Parcel 38)
- Haslam Farm, Rawtenstall (SHLAA ref 16249/Green Belt Parcel 25)
- Land at Blackburn Road, Edenfield (Draft allocation H72/SHLAA ref 16256/Green Belt Parcel 39)

This letter firstly provides general comments on the documents published within Examination Library 8, including their scope and context with respect to the discussions at the EiP hearing sessions. It then goes on to consider and provide comments on specific documents in turn.

GENERAL COMMENTS

Peel recognises the progress made by RBC to assemble additional evidence which seeks to address the Schedule of Actions (EL6.001) published by the examination Inspectors. It is an important step towards the adoption of the Plan. However, Peel considers that the “second tranche” of additional evidence documents do not fully address the Schedule of Actions (EL6.001), and do not resolve the principal soundness concerns identified by Peel and other parties which were discussed during the EiP hearing sessions. Peel’s comments to the “first tranche” consultation held in late 2020 made a number of overarching comments in this respect, which are reiterated as follows.

The Approach to Consultation

The additional evidence has been published in “tranches”. This approach – the publication of evidence base documents in stages and in isolation from each other – prevents a meaningful consideration of all the evidence and the soundness of the Plan in the round. This is particularly the case given that some components of the evidence base have been published part way through a consultation on a particular “tranche”.

For example, the Local Plan Economic Viability Assessment: Update Report (February 2021) (EVAUR) is relied upon by RBC to justify various aspects of the draft Plan, such as the proposed housing standards which formed part of the “first tranche” consultation. The Planning Practice Guidance (PPG) makes clear that engagement and consultation is a critical part of preparing robust viability assessments (Paragraph 004 Reference ID 10-004-20190509, and Paragraph 006 Reference ID 10-006-20190509) and Local Plans. Despite this, the EVAUR was only published on 1 March 2021, after the “first tranche” consultation had closed and indeed several weeks after the “second tranche” consultation commenced. This means that the EVAUR has only been made available for review and comment for a period of c.two weeks and only in isolation from other parts of the evidence base which are reliant upon it. This is not considered to be consistent with the requirements of the NPPF and PPG. It is also not considered to be consistent with statutory requirements in respect of consultation.

This limits the degree to which the recent consultations can be considered meaningful. Peel therefore reserves the right to provide further comments in due course.

The Housing Requirement

A key unresolved issue in respect of the draft Local Plan concerns the scale of residential development which is to be planned for. The draft Local Plan proposes a requirement of 212 dwellings per annum (dpa). However, RBC conceded during the EiP hearing sessions – in response to evidence presented by Peel and other parties – that the requirement is deficient, and in particular is not aligned with the scale of economic growth which is planned for. RBC’s representatives stated that an increase in the requirement to a minimum of 236 dpa would be appropriate. This is acknowledged in the Inspector’s letter to Peel dated 4 September 2020 which confirms as follows in respect of the housing requirement:

“this was the subject of extensive discussion at the hearing session, and the Council did suggest at one point that a higher housing figure would be appropriate.”

However, this is not acknowledged by any of the additional evidence published by RBC as part of Examination Library 8. For example, the SA Addendum (EL8.001.3) and Exceptional Circumstances for Green Belt Release (EL8.008.12) remain based on a requirement figure of 212 dpa. Peel remains of the view that this requirement is unsound and requests clarification from the examination Inspector’s about how this matter is to be resolved.

The Plan Period

Peel is mindful of the requirement in the NPPF that Local Plans should cover a plan period lasting for “...a minimum 15 year period from adoption...” (paragraph 22). Given that almost 18 months have elapsed since the EiP hearing sessions and that various matters remain unresolved, it is evident that the Local Plan will not be adopted until 2021/22 (i.e. after 31 March 2021). As such, the Local Plan period will need to extend up to at least 2036/37, such

that it covers a period of at least 15 years and is consistent with the requirement of the NPPF in this regard. This will require at least a further three years to be added to the plan period, which is currently proposed to expire in 2033/34, with consequent implications for the scale of development which is planned for and the quantum of sites which have been identified

The resumption of examination hearing sessions

Peel reiterates its support for the progression and adoption of the Local Plan. However, it is evident that the additional evidence which comprises Examination Library 8 fails to address a number of significant issues which relate to the soundness of the Local Plan. Peel is keen to work with RBC to resolve these issues such that the Plan can be found sound and adopted expeditiously. It is, however, clear that further EiP hearing sessions will be required to resolve the outstanding matters, including in particular those relating to the housing requirement, and to enable thorough examination of the additional evidence made available by RBC. In this context, Peel respectfully requests clarity from the RBC and/or Examination Inspectors about the next steps for the EiP.

A Counsel Advice Note from John Barrett is provided at **Appendix 1** to this document and addresses the matter of further Hearing Sessions in full. Crucially, the Procedure Guide for Local Plan Examinations acknowledges that further Hearing sessions should be held *“where essential in the interests of fairness or in order to clarify or resolve substantial new issues arising from the representations”*. The scale of unresolved issues and volume of additional evidence base documents requires further discussion at Hearing Sessions to ensure the evidence and emerging Plan is appropriately tested and to give opportunity to interested parties to resolve any new issues arising from the updated evidence.

COMMENTS ON “SECOND TRANCHE” DOCUMENTS

EL8.002.2 Action 2.2 – Settlement Hierarchy

Document EL8.002.2 provides further evidence regarding the sustainability/ranking of each settlement in the Borough, and presents a series of changes to the proposed settlement hierarchy. It is assumed that the revised settlement hierarchy would be transposed into Strategy Policy SS (Spatial Strategy) of the Local Plan, replacing points a) to e) of the Submission Draft version of that policy. Peel reserves the right to comment further once the proposed modifications to Strategy Policy SS in this regard have been published for consultation; however, it supports the revised settlement hierarchy presented in Document EL8.002.2 and considers the inclusion of this hierarchy in Strategic Policy SS would present a clearer understanding of the proposed spatial strategy for the location of new development in the Borough.

EL8.004.3 Action 4.3 – Open Space Study

Peel welcomes the preparation and publication of the Open Space Study.

In respect of the two draft allocations Peel is promoting (H47 and H72), the Open Space Study confirms that H47 *“...would exacerbate the quantity shortfall but create no accessibility gap in provision...”*. Peel agrees that there would be no accessibility gap. With the inclusion of high quality public POS within the site and possible contributions to existing nearby spaces, as referred to on page 89 of the Open Space Study, the site can be brought forward with no negative impacts on POS provision.

For the avoidance of doubt, the Open Space Study has not assessed the housing allocation H72 as the site is not publically accessible.

Peel agrees that further information is required as part of a future Open Space Supplementary Planning Document and has no comments to make at this time on the scope of the SPD as set out in RBC’s response to EL8.004.3.

EL8.005.2 Action 5.2 – Employment Land Supply

Strategic Policy EMP1 (Provision for Employment) of the emerging Local Plan sets out a requirement to “...provide sufficient employment land to meet the Borough’s requirement of 27 hectares...” This scale of provision – which was confirmed as a requirement during the examination hearing sessions in late 2019 – is a mid-point of the recommended employment land requirement range of 22-32ha range identified by the Employment Land Review¹ (ELR). The 22ha figure at the bottom end of the range was based on trends of past delivery of employment land in the Borough, which RBC has stated “...has been low and it could be considered that this under supply has been constraining Rossendale’s economic growth...”²; it was therefore disregarded in favour of the 27ha figure, which RBC states is “...intended to meet Rossendale’s employment space needs in full so that its economy is not constrained...”³. In this regard the requirement is also a key factor in RBC’s objective to limit out-commuting. Policy EMP1 therefore establishes a strategic requirement to deliver 27ha of employment land, and the Local Plan states that sufficient land will be allocated to deliver this requirement figure³. RBC re-affirmed its commitment to this requirement figure during the examination hearing sessions in late 2019.

Document EL8.005.2 seeks to confirm information about the employment land supply. It states that the employment land supply for the plan period up to 2034 is c.23.5ha. This is lower than previously reported by RBC, in part because two mixed-use allocations are proposed to be deleted. This scale of provision represents a shortfall of c.3.5ha – or almost c.13% – of the 27ha employment land requirement set out in Strategic Policy EMP1; indeed, it is more in line with the low ‘past trend’ figure noted by RBC to be a constraint to economic growth. As such, this scale of provision is not:

- Positively prepared given that it fall short of the areas objectively assessed need for employment land; and
- Consistent with national planning policy because it would not enable delivery of sustainable development in accordance with the policies of the NPPF which, in respect of the economic role of sustainable development, makes clear that the planning system must ensure that “...sufficient land of the right types is available in the right places and at the right time to **support growth**, innovation and improved productivity...”⁴.

The provision of just 23.5ha of employment land cannot therefore be considered to represent a sound strategy.

Document EL8.005.2 does not set out what action is proposed by RBC to address this shortfall and the soundness issues that arise. However, given the strategic nature of the 27ha requirement and its importance to the sustainability of the Plan, Peel considers that additional sources of employment land will need to be identified in order for the Plan to be considered sound.

EL8.011 Actions 11.1 to 11.3 - Housing Site Allocations - Haslingden and Rising Bridge

This document seeks to address queries raised against housing site allocations at the Local Plan Examination. In respect of the Peel promoted draft allocation H47 – Land at Kirkhill Avenue, Haslingden, RBC was asked to provide justification for the loss of open space and re-consult Lancashire County Council (LCC) in respect of highways and access.

The Development Framework for this site which has been submitted to RBC during the Local Plan preparation process (most recently with the Hearing Statements), confirms that any scheme will enhance the existing POS on site. Development Framework Plan shows how a scheme can be brought forward to retain the footpath linkages currently used informally by local residents. Therefore, in accordance with RBC’s paragraph 2.3, the qualitative

¹ *Rossendale Employment Land Review: Final Report*, Lichfields (17 February 2017)

² Paragraph 116 of the emerging Local Plan.

³ Paragraph 118 of the emerging Local Plan.

⁴ NPPF, paragraph 8.

improvement and usability of the POS in this location will ensure the allocation does not create an accessibility gap in urban greenspace provision in the area.

It is worth noting that RBC has suggested at paragraph 2.2 that the developable area is “limited to 0.74ha”. While this figure is stated in Table 1: Housing Site Allocations of the emerging Local Plan, there is no policy requirement that limits the net developable area. The developable area will be determined at application stage. RBC have remained of the view during the Local Plan preparation stages that the site can only achieve a housing capacity of 22 units however Peel have undertaken a detailed masterplanning exercise that shows the site can achieve a much higher capacity of 50 dwellings.

Access from Kirkhill Road and Kirkhill Avenue has been broadly accepted as a possible access strategy by LCC. There are no reasons why ownership constraints restrict the allocation and delivery of the site for housing.

Finally, we would also draw attention to the points made at paragraphs 1.13 – 1.16 of our Matter 11 Hearing Statement in respect of broadening the allocation site boundary and including the Peel promoted site Moorland Rise (capacity of 60 units) to the immediate south of draft housing allocation H47.

EL8.014 Actions 14.1 to 14.4 - Housing Site Allocations - Edenfield, Helmshore, Irwell Vale and Ewood Bridge (with appendices)

This document seeks to address queries raised against housing site allocations at the Local Plan Examination. Each point addressed by RBC in respect of the part-Peel promoted draft allocation H72 – Land west of Market Street, Edenfield is provided below.

LCC Highways has not provided any objections on highway grounds to accessing the Peel parcel of the site (north of Church Lane) via Blackburn Road. Peel is comfortable that the required visibility splays can be achieved via Blackburn Road and agree that a future application will be capable of addressing the requirement to contribute to improvements to the Market Street corridor along the site frontage.

LCC Education Department and RBC have undertaken feasibility work relating to the extension of either Stubbins or Edenfield Primary School and concluded that both schools present possibilities for expansion to accommodate the estimated increased need. Peel agrees that details of the primary school expansion can be addressed at a later stage but welcomes the acknowledgement that the expansion is not needed within the draft allocation site in the form of a new school. Wording to this effect within the draft Policy should therefore be removed given that it is unnecessary and therefore unjustified. Peel suggests RBC engage with them separately in respect of Peel owned land to the north and east of Edenfield School that may be suitable for Edenfield Primary School’s expansion.

Peel welcomes and supports the findings of the Green Belt Assessment prepared by LUC in respect of the Edenfield School expansion. The Council’s consideration at paragraph 4.3.7 is supported; there is sufficient flexibility to pursue the possible expansion of Edenfield Primary School without amending the Green Belt boundaries in this location.

Peel welcomes the Heritage Impact Assessment and agrees with the overall conclusion that any minor harm on the setting of Edenfield Parish Council can be appropriately mitigated through the design and layout of the proposed scheme at application stage.

EL8.019.4 Action 19.4 – Manchester Rd and Clod Lane, Haslingden Site

Document EL8.019.4 sets out RBC’s proposed response to representations from DPP on behalf of the landowner in respect of the above site. It sets out that RBC proposes to include the delivery of 50 dwellings from this site within the housing land supply on the basis that:

- The site benefits from an extant planning permission dating back to 1972, which has not implemented in full due to the discovery of previously unidentified geological constraints. The landowner contends that this extant planning permission provides a ‘fall back’ position in planning terms, with reference to a legal opinion provided by David Manley QC. RBC states that the extant planning permission is “...a material consideration to which the Council gives substantial weight in the planning balance...” (paragraph 4.15).
- The harm to the Green Belt which will result from the development of the site – which will be substantial given that the site is considered rated as making a strong contribution to the Green Belt purposes – is, in effect, outweighed by the “...weight [which] must be afforded to the extant planning permission which could be implemented...” (paragraph 4.14); and
- Whilst RBC does not consider that the entire site is suitable for development, it accepts that a part of it “...could be suitable...” (paragraph 5.1) for the development of 50 dwellings on the basis of a Preliminary Land Stability Assessment carried out by WML Consulting in 2015, albeit this is subject to the findings of “...further detailed investigation and assessment...” which is yet to be carried out (paragraph 5.1).

Peel does not dispute that the site benefits from an extant planning permission, but it has sought its own legal opinion in respect of the degree to which it can be considered to provide a ‘fall back’ position in planning terms, which is provided at **Appendix 2** and which forms part of Peel’s representations. It identifies that, *inter alia*:

- In order to represent a true ‘fall back’ position, there must be a realistic possibility or likelihood of the 1972 planning permission being implemented without further action by RBC. It is noted that this is not a matter which is considered by the legal opinion which the landowner has provided to support its case.
- Case law makes clear that it is “inescapably necessary” for RBC to come to a judgement on whether or not there is a realistic possibility or likelihood that the 1972 planning permission will be implemented. There is no evidence that RBC has done so.
- The Preliminary Land Stability Assessment, which has been provided by the landowner as evidence that the geological constraints at the site can be overcome, does not prove that the site is suitable for development, only that a part of it might be suitable but this is subject to a caveat that further investigation is required in order to establish that proposition.
- The landowner’s representations make clear the implementation of the 1972 permission is not be a realistic and commercially sensible action. It has acknowledged that the continued delivery of the extant planning permission in terms of numbers, layout and design – including in respect of house types dating back almost 50 years – would not be attractive to the modern housing market or consistent with modern building standards, including statutory provisions such as Building Regulations.

It is therefore evident that:

- (a) RBC has not undertaken that which the law requires to be “inescapably necessary”; namely, to come to a judgment on the whether there is a realistic possibility or likelihood of the 1972 extant permission being implemented, and indeed the evidence makes clear that this is not the case; and
- (b) The 1972 planning permission does not represent a true ‘fall back’ in planning terms.

RBC’s judgement that “substantial weight” can be afforded to the 1972 planning permission is therefore fundamentally flawed, and it is both inappropriate and unsound to include the delivery of 50 dwellings from this site within the housing land supply. This is particularly the case given that:

- The site is designated as Green Belt, and that the absence of a true ‘fall back’ position requires that it would be necessary for any new planning application for the site (or a part thereof) would need to demonstrate ‘very special circumstances’ in line with the requirements of the NPPF (paragraph 144).
- The SHLAA [EB004] identifies that the site (reference: SHLAA16283) is subject to not suitable for residential development in respect of its ecological value, noting that it is “...located in a Biological Heritage Site, Local Geodiversity Site or Core Area or Stepping Stone areas...”. Indeed, the site appears to have relatively dense tree and shrub coverage which could present a significant constraint to development.

EL8.020.2 ACTION 20.2 – VIABILITY STUDY UPDATE

Peel’s representations to the emerging Plan and subsequent statements to the examination have highlighted that the supply of land which is currently proposed is located predominantly in weaker market areas to the east of the Borough where viability is marginal or negative, such that it is not deliverable and/or is not likely to be capable of delivering the affordable homes required. These representations and comments were provided with reference to a critique of development viability in the Borough.

RBC has published the EVAUR as part of the “second tranche” consultation. This responds to a requirement for additional evidence, information and points of clarification. Turley Development Viability has reviewed the EVAUR and provides the following comments:

Benchmark Land Values (BLV)

The Inspector’s Point of Action requested the Council’s viability advisor to justify the figures used by an explanation of the evidence in the report.

Following discussion of transactional evidence (‘TE’) at the EiP hearing sessions, it was understood that the Inspector required an explanation of how the TE that was included at Table 4.13 of the Rossendale Local Plan Economic Viability Assessment March 2019 (‘LPEVA’) had been referenced in setting BLVs for comparison with the residual land values produced by the viability testing. The TE was set out as follows:

Type	Address	Sub Area	Gross Area (ha)	Net Area (Ha)	Price Paid	Date	Price per Gross ha	Price per Net Ha	Price Per Gross Acre	Price per Net Acre
BF	Former Kearns Mill Site, Cowpe Road	Cowpe	1.73		£550,000	Sept 15	£317,919		£128,660	
BF	Former Holden Vale Hotel,	Helmshore	1.0	1.0	£515,000	May 16	£515,000	£515,000	£208,502	£208,502
BF	Whinberry View, Bacup Road	Rawtenstall	0.72	0.72	£645,000	Oct 14*	£895,833	£895,833	£362,539	£362,539
GF	Oaklands Drive and Lower Cribden Avenue	Rawtenstall	1.57	1.43	£1,488,000	Jun 12	£947,770	£1,040,560	£383,558	£421,279
BF	Health Centre, Yorkshire Street	Bacup	0.21	0.21	£300,000	May 18	£1,428,570	£1,428,570	£578,135	£578,135
BF	Greensnook Cottages, Greensnook Lane	Bacup	0.11	0.11	£163,000	May 17	£1,433,588	£1,433,588	£580,400	£580,400
BF	Croft End Mill, Bolton Road North	Edenfield	0.45	0.45	£725,000	Oct 17	£1,611,111	£1,611,111	£659,000	£659,000
BF	Former Edenfield Methodist Church	Edenfield	0.52	0.52	£200,000	Nov 16	£1,669,137	£1,669,137	£674,764	£674,764
BF	Horse and Jockey Pub,	Edenfield	0.22	0.22	£470,000	June 17	£2,138,835	£2,138,835	£864,925	£864,925

Table 4.13: Residential Land Transactions in Rossendale
*Part acquired in 2006

The AVAUR provides no reference to the TE and the EVAUR does not appear to fully respond to the Inspector’s Point of Action.

As expressed in previous representations, it is essential that the BLVs are set at levels which reflect “...reasonable expectations of local landowners”, in line with PPG: Viability (‘PPGV’).

Whilst each site will differ, and some may not have achieved full policy compliant provision of obligations, the TE provides an indication of land owner requirements in the locality. The TE is regarded as appropriate to set the context against which BLVs should be assessed.

Where the evidence did not come forward on a policy compliant basis, adjustments to the land value should be considered, in line with PPGV, which states: *“Land transactions can be used but only as a cross check to the other evidence. Any data used should reasonably identify any adjustments necessary to reflect the cost of policy compliance (including for affordable housing), or differences in the quality of land, site scale, market performance of different building use types and reasonable expectations of local landowners.”*

Neither the LPEVA nor the AVAUR provide any discussion in respect of value adjustments that may be required.

The EVAUR adopts a differential approach to the assessment of BLVs, with greenfield BLVs at lower values than brownfield. In contrast, the TE includes one greenfield site in Rawtenstall (value zone 2) which generates a higher £ per net acre value than the values achieved for brownfield sites in value zone 2 and 3. The brownfield land values adopted within the LPEVA are regarded as the absolute minimum required for the release of land for higher value development in Rossendale, and Peel requests that an equalised approach to greenfield and brownfield benchmark land value assessment should be adopted.

Also, the TE provides confirmation that the £ per acre values adopted as BLVs fall well below land owner requirements, generating a risk that development will be constrained by policy requirements that are based on exaggerated levels of viability.

Construction Costs

The EVAUR states that Paragraphs 2.1 to 2.9 of the LPEVA contain an explanation of the limitations of BCIS. These paragraphs have previously been reviewed and are regarded as insufficient to justify the exclusion of any cross reference of adopted costs with BCIS costs, which PPGV regards as “appropriate data”.

The EVAUR includes a generalised statement in respect of BCIS discounts that are often encountered in viability assessments that are reviewed by the Council’s viability assessor. No evidence is provided to support the statement and the precedent that is potentially set by this statement is not accepted.

Despite providing confirmation that BCIS cost information is adopted by applicants, it does not appear that this information has been included in the *“extensive database of local construction costs derived from information provided to us by housebuilders actively undertaking development in the North West Region”* that is set out at Appendix 3 of the EVAUR. The selective approach to inclusion in the construction cost database is not regarded as appropriate, as it does not reflect the full range of cost assessments that are available.

Garage costs are set out in the EVAUR, and are regarded as acceptable, albeit at the low end of the range of costs that are incurred by developers. However, the garage costs are wrapped into an all-in construction cost rate along with professional fees and contingency, making it impossible to easily check the adopted cost assessments.

A summary of the database of local construction costs is provided at EVAUR Appendix 3.

This information is regarded as beneficial, improving the level of transparency of the Council’s evidence. However, the information remains restricted, with the development area of each scheme not presented, meaning that the average construction cost rates that are presented cannot be checked. This is an important issue, as other average figures that are presented at Appendix 3 appear to have been incorrectly calculated.

Average figures for professional fees and contingency have been assessed as an average of the percentage figures that are provided for each scheme. This is, in effect, an average of an average and, when compared to the average that is produced when the total professional fees and contingency are divided by the total construction costs, produces a percentage figure that falls below that which is generated via a correct calculation.

The differences are shown in professional fees and contingency allowances are shown in the following table:

Units	EVAUR Professional Fees %	Corrected Professional Fees %	EVAUR Contingency %	Corrected Contingency %
0-15	5.84%	6.74%	3.08%	4.32%
16-24	7.42%	8.00%	3.29%	3.76%
25-74	5.64%	6.36%	2.95%	3.25%
75-99	5.80%	6.77%	3.28%	3.94%
100-149	5.79%	6.84%	4.07%	4.88%
150-225	5.32%	6.38%	3.65%	4.31%
226-500	4.71%	5.31%	1.91%	2.36%
500+	5.63%	6.55%	3.17%	4.30%

The calculation of each cost for all schemes falls below the correct assessment, causing concern that the adopted cost assumptions are based on incorrect analysis. Peel request that professional fees allowances are increased, as the costs adopted in the AVAUR fall below the corrected percentages.

The credibility of the Council’s evidence is of concern, whereas BCIS data is published for public use (via subscription) and is accepted within PPGV. Peel request correction of calculation errors and suggest that further details of the construction cost database should be published, in line with the transparency requirements of NNPF and PPGV, including the publication of viability assessments.

The viability testing results show that brownfield development of up to 50 dwellings is either unviable with no affordable housing in Zone 1, or can accommodate a maximum of 20% affordable housing at 40 dph in Zone 2.

Greenfield development is shown to be marginally viable at nil affordable housing in Zone 1 at 40 dph and viable with 20% affordable housing in Zone 2.

These results indicate that policy compliant development in Bacup, Stacksteads (Zone 1), Whitworth, Facit, Shawforth, Britannia, Weir, Newchurch, Waterfoot, and East Rawtenstall is not viable. Viability will decrease further upon the adoption of increased BLVs and construction costs, indicating that development expectations should be focussed on the higher value locations of the Borough.

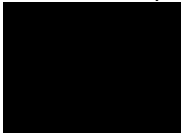
CONCLUSION

Peel trusts that the comments provided in this letter are useful to RBC and the examining Inspectors. It reiterates that it is keen to support RBC’s progress of the Local Plan such that it can be adopted as soon as possible. However, the additional evidence published within Examination Library EL8 addresses only some of the matters and soundness concerns raised during the EiP hearing sessions, and the most significant issue – the scale of the housing requirement – has been ignored entirely. The further evidence published by RBC which is the subject of this

consultation also raises further issues which require consideration and discussion. Peel therefore has ongoing concerns about the soundness of the Local Plan, and considers that further hearing sessions are required in respect of these and other matters. Peel encourages RBC to make swift progress in this respect given the significant delay which has already elapsed since the initial hearing sessions in Autumn 2019.

Peel would be happy to discuss the content of this representation with RBC. If this would be useful, please do not hesitate to contact either myself or my colleague Nick Graham.

Yours sincerely



Jenny Fryer
Senior Planner



APPENDIX 1: COUNSEL OPINION IN RESPECT OF THE RESUMPTION OF LOAL PLAN HEARING SESSIONS

TOWN AND COUNTRY PLANNING ACT 1990

ROSSENDALE LOCAL PLAN 2019-2034

ADVICE NOTE

1. I have seen the Schedule of Actions that the LPA has prepared. The actions are far from being straightforward matters of clarification or amplification of material already presented or discussed at the Hearing sessions. Some involve the provision of primary information that will be made available for participants following the action implemented by the LPA. These involve a number of matters including:

- An assessment of alternative sites (1.2)
- A SA addendum (1.3)
- A “new” supporting document which clarifies the sustainability/ranking of each settlement (2.2)
- Undertake an Open Space Assessment (4.3)
- Address the omission sites and undertake a short technical assessment and SA (particularly for non-Green Belt sites) (8.1)
- Provide additional evidence concerning the optimisation of density on sites (8.4)
- For all GB parcels recommended for release in the GB study and the reasons why some were not fully assessed for potential development (8.6)
- Provide clearer site selection evidence – including how the Council reached the conclusion on suitability and reasons for selection or rejection and why some small GB options it was deemed that harm was not outweighed by the need to deliver identified development needs (8.7)
- Produce a paper setting out a strategy and list of potential sites/schemes which could provide compensation for GB loss i.e. how/where/when/what (8.10)
- Include costs of GB loss compensatory measures in Viability Assessment (8.11)
- A number of site-specific issues in relation to housing sites sections 9 to 14
- Produce a technical note for all mixed-use sites addressing land ownership plan, owners’ intentions, overview of key constraints and how they can be overcome, development requirements, access details, high level viability assessment (15.1)
- High level breakdown of works necessary to bring the site forward that will not be able to be carried out by the developers. Explain the actions the Council will take to secure funding (15.2)
- A number of site-specific comments in relation to employment sites then follow in the remainder of section 15

- Justification for requirements of policy ENV5 including the viability implications of providing 20% net gain (16.1)
- Carry out a Built Sports facilities Assessment (17.1)
- Provide further evidence to justify having maximum parking standards (18.1)
- Produce a paper to confirm latest housing land supply position (broken down by sources of supply) – invite comments by 28/10/19 (19.1)
- A number of site-specific comments on housing sites including 19.4
- Undertake an update to the viability assessment, which is dependent on justification through notes and main modifications. It will need to cover: new updated open space/sports requirements, compensatory improvements for Green Belt, custom and self build housing and Green infrastructure 20% net gain. (20.2)

2. The Council has been preparing various additional pieces of evidence to address those actions including its statement in respect of the Manchester Road/Close Lane site in Haslingden (19.4) upon which I have already advised Peel L&P.

3. The evidence has been the subject of consultation and Peel L&P is submitting representations that comment on key documents, identifying soundness concerns with the new evidence where relevant.

4. Peel L&P expected that the Hearing sessions would resume to allow debate and testing of the additional evidence – much of which is new. However, the Programme Officer has suggested that this may not be the case. The Programme Officer has written to Peel L&P as follows:

“It is not envisaged at this stage that the Inspector will call for a resumption of hearings although of course the Inspector will reserve the option to implement this if new information or outcomes from the consultation exercises warrant it. However, my expectation is that following the close of the current consultation (and assuming this does indeed embrace any final items in the course of production) the Inspectors will consider all the responses and then encourage the Council towards a Main Modifications consultation. This in turn – and in the absence of any significant new issues arising – should then lead on to the Inspectors’ final report and ultimate adoption of the Plan by the Council. In summary, I anticipate some further months passing before we get to an adopted Plan.

There is the possibility of some interim letter from the Inspector after the current consultation responses have been digested, although my recollection is that this is in part at least generated by a previous commitment concerning the Gypsy & Traveller topic which was subject to a telephone based hearing last year.”

5. Peel L&P considers that further hearings are necessary to enable thorough examination of the soundness of the latest evidence and any proposed changes to Local Plan policies. To do otherwise would amount to being unfair as that would prevent a proper debate and examination of evidence. The point will be made in Peel's latest representations to the current consultation that will be submitted on 1 March.

6. I have been asked to give my thoughts in this respect.

7. The recently issued version 7 (February 2021) of the Procedure Guide for Local Plan Examination whilst not a statutory guidance makes the point at paragraph 2:

"The content of this document is guidance only with no statutory status. However, in the interests of consistency, efficiency and fairness, all parties should follow its general principles, as will Inspectors who may adapt them as necessary for an individual examination while ensuring that no party is prejudiced."

8. The Guide references the 1957 Franks Report recommendations for inquiries to apply the tests of openness, fairness and impartiality. The Guide adds the following (page 9) in the context of post examination procedures:

"The Inspector considers any representations on the MMs as expeditiously as possible. Further hearing sessions are only held where essential in the interests of fairness or in order to clarify or resolve substantial new issues arising from the representations."

9. Section 20(6) of the Planning and Compulsory Purchase Act 2004 retains the right to be heard in support of an objection to an emerging Local Plan. It is interesting to note that the Government had originally proposed doing away with this right but encountered strong objection and did not proceed then to abolish such right. The right to be "heard" in the context of an examination need not mean a right to cross-examine other participants and it may be tightly circumscribed by the Examining Inspector who enjoys a wide discretion as to the conduct of the proceedings.

8. In **R. (Vetterlein) v Hampshire County Council** [2002] Env LR 8 Sullivan J. at paragraph 68 said:

"In deciding whether there has been a breach of Article 6(1) the procedures have to be looked at in their entirety, including the earlier opportunities to make representations during the consultation process and the subsequent right to seek relief by way of judicial review if the Council errs in law. A "fair" hearing does not necessarily require an oral hearing, much less does it require that there should be an opportunity to cross-examine. Whether a particular procedure is "fair" will depend upon all the circumstances, including the nature of the claimant's interest, the seriousness of the matter for him and the nature of any matters in dispute."

9. The leading case is ***Hopkins Developments Ltd v Secretary of State for Communities and Local Government*** [2014] EWCA Civ 470 that made the key point that the requirements of fairness are “acutely fact sensitive”.

10. However, in ***R(Adlard) v Secretary of State*** [2002] 1 WLR 2515 it was held not to be unfair to deny an oral hearing to the objectors to a planning application for the expansion of a football stadium. The Court of Appeal held that there was no justification for a conclusion where decisions were likely to turn on questions of judgment and discretion rather than on oral findings of fact that an oral hearing would be required. However, Simon Brown LJ at paragraph 31 and 32 concluded that:

*"For my part, I can find no warrant, whether in domestic or in Strasbourg jurisprudence, for concluding that where, as in Runa Begum and as again here, the administrative decisions taken at first instance are generally likely to turn on questions of judgment and discretion rather than on findings of fact, the statutory scheme must provide for an oral hearing at that initial stage. On the contrary, I have reached the clearest conclusion that the statutory scheme as a whole is plainly compliant with article 6 and that there is no need to resort to the Secretary of State's call-in power to make it so.
... I should make it plain, however, that I am by no means persuaded that any oral hearing was required on the facts of the present case. Quintessentially the decision whether or not the permit this development (and the departure from the development plan which it represents) involves questions of discretion and planning judgment rather than the resolution of primary fact."*
[my emphasis]

11. The relevance of the issue of “resolution of primary fact” is important in the context of the Rossendale Plan where new information is being provided.

12. The Council's provision of material by reference to the Schedule of Actions well after the Examination Hearings and that itself will not be subject to examination and testing is unfair. Much of this will – self-evidently - be entirely new material and will go very much to the heart of the issues explored and tested in the Examination in Public. The problem that I discern is this is the material that should have been available to inform the decisions and site selections made by the LPA before submission of the Local Plan. The process that is being promoted through the Schedule of Actions runs a risk appearing to retrofit evidence to decisions already made or will identify matters that will require policies/allocations to be revisited and different decisions or changes applied to them. The participants of the Examination will obviously be made aware of the material but what is unclear is how the material will be dealt with. The short point to note is that it became clear during the Examination process that there was inadequate justification and evidence to support the Local Plan.

13. The conclusion that MM's are required demonstrates that the Local Plan – as submitted – was unsound.

14. To bring forward the Local Plan has therefore required MMs but these are not founded on the outcome of consideration of the material made available for the Hearing sessions. On the contrary the MMs will be predicated on the provision of wholly new material.

15. If fairness required the need for Examination Hearings of the submitted Local Plan then where – as here – substantive revisions by way of MMs are required for soundness to be proved fairness *mutatis mutandis* requires the deployment of a similar procedure for testing the evidential foundation of the Plan that was demonstrably absent from the submitted version.

16. The case for some form of oral examination in a case where the decision maker has to resolve an issue of primary fact is because the conflict of evidence needs testing and a conclusion reached on actual evidence that is an essential pre-requisite for a decision on many of the issues addressed in the Examination hearings. This is a process that is difficult to envisage being conducted by exchange of correspondence or witness statements as that would not involve testing of the evidence.

16. Specifically, in respect of the Manchester Road, Haslingden site because a crucial issue is whether a “fall back” exists is a fundamental consideration **before** the determination of whether it can contribute to deliverable supply or is capable of being a factor in whether “exceptional circumstance” exist to warrant any change to the Green Belt (albeit that it would appear that the LPA is not proposing any MM to change the Green Belt at this stage).

17. In the specific case the Haslingden site the evidence must establish an intention and willingness to implement the 1970’s permission. Peel L&P have challenged that “evidence”. The Council has not considered the point and has only looked at the first element of “fall back”; namely, the issue of whether there is an unconstrained right to develop.

Conclusion

18. The Procedure Guide for Local Plan Examinations acknowledges that further Hearing sessions can be held: *“where essential in the interests of fairness or in order to clarify or resolve substantial new issues arising from the representations”*.

19. The decision to be made will recognise that the Local Plan as submitted was unsound and requires MMs to meet the legal requirements for a development plan. The evidence to support the plan is, in many instances, not simply inadequate but wholly absent. In the Examination hearings that have taken place the participants could test such evidence as there was and made the case in respect of the paucity or absence of necessary evidence. If no further Hearings session is scheduled to enable the testing of new evidence such would be both objectively unfair and deny those that have already engaged in the process an opportunity equal to that enjoyed in the process thus far to resolve the new issues that the additional work by the Council has thrown up.

20. I have dealt with all the matters raised, but if I can assist further please do not hesitate to contact me.

[REDACTED]

[REDACTED]

JOHN BARRETT

Leeds and Birmingham

February 2021

**APPENDIX 2: COUNSEL OPINION IN RESPECT OF THE MANCHESTER ROAD AND CLODE LANE, HASLINGDEN SITE IN
RSEPECT OF EL8.019.4 ACTION 19.4**

TOWN AND COUNTRY PLANNING ACT 1990

ROSSENDALE LOCAL PLAN 2019-2034

LAND AT MANCHESTER ROAD AND CLOD LANE, HASLINGDEN

O P I N I O N

Introduction

1. I am instructed by Turleys to advise Peel L&P as to the progress of the objections that have been made on their behalf to the emerging Rossendale Local Plan.
2. In particular, this Opinion deals with the treatment by the Local Planning Authority in respect of a site at Manchester Road/Clod Lane, Haslingden (“the site”).

Background to the Site

3. The site is being promoted for release from the Green Belt and allocation for residential development by Lindon Park Developments Limited (“Lindon”). The case that was put forward by DPP on their behalf was principally based on the planning history of the site.
4. In respect of the emerging Local Plan Rossendale Borough Council has published a Schedule of Actions and specifically Action 19.4 that concerns the site. The Council’s proposal, at least on the face of its response in Action 19.4, is not to propose the

release the site from the Green Belt but to include it as one making a contribution of 50 units to the LPA's deliverable housing supply in the Plan period.

5. The expressed rationale of the LPA is set out at Paragraph 4.15 that states:

"The extant planning permission (Ref: 13/2/2758) is a material consideration which the Council gives substantial weight in the planning balance for any future development proposal relating to the site. Considering the extant permission could still be implemented in the areas deemed potentially suitable for development, as set out in the Report, the Council does consider the inclusion of the site in the housing supply to be appropriate subject to the following:

- *a planning application is submitted for a residential scheme within two years of the emerging Local Plan being adopted;*
- *the site area covered by the prospective planning application is restricted to the revised site area for the site, as shown on Figure 4, which is based on the evidence submitted by DPP; and*
- *the capacity of the site is limited to no. 50 units. This capacity is based on the revised net developable area of approximately 1.68 ha and the density of 30 dwellings per hectare."*

6. This response and especially in terms of the requirement to submit a planning application within two years appears to be derived from the letter dated 27th April 2020 from DPP that is Appendix 1 to the Action 19.4 document. That letter stated:

"It seems reasonable to us that, given the fact that the historic permission remains extant, the site should feature in the Council's housing land supply, but that this is on the basis that a planning application for a new acceptable scheme in numbers, layout and design terms, is made within a stated period. If not the site's contribution to housing land supply numbers could then be scrubbed out."

7. This Opinion will address two matters:

- (a) The basis whereby the planning history of the site leads to justification for its release from the Green Belt; and

- (b) The ability of the site to make a contribution to housing supply.

Factual Background

8. On 7th January 1972 outline planning permission was granted for up to 235 dwellings¹. Subsequently on 25th October 1972 a detailed planning permission² was granted for 216 semi-detached and 15 detached dwellings, a total of 231 dwellings.
9. 44 dwellings were constructed pursuant to the detailed planning permission granted on 25th October 1972. These dwellings remain and are occupied. It is reported in the Structural Engineer's report of December 2015 that in 1973 damage to the foundations of four houses constructed by Rowlinson Construction had been occasioned³.
10. Crucially, the reason why the site was not built-out in the early 1970s was, according to DPP, because it was "well documented" that the site was subject to technical issues relating to ground conditions affecting part of the site. In particular, a geological fault line crosses part of the site, and at the time the development was granted planning permission and later when the planning permission was implemented this feature was unknown. As a consequence DPP observed that the site was "effectively mothballed."

Legal Background

11. A key component of both elements of Lindon's case is that they have the ability to implement a "fallback" planning permission.
12. In order to be in a position to assert that a "fallback" position exists, two essential pre-requisites are required to be demonstrated:

¹ Ref: 13/2/2600LA.

² Ref: 13/2/2758.

³ WML Report, December 2015, para.5.4.

- (a) The Applicant must be able to demonstrate a lawful ability to implement an existing planning permission without the possibility of intervention by the LPA; and
 - (b) There is real prospect or real possibility that the “fallback” planning permission would be implemented.
13. With regard to the first issue, there does not appear to be any dispute that the planning permission was implemented by the construction of 44 dwellings and therefore remains extant. This was the subject matter an Advice by David Manley QC⁴.
14. However, the second component that deals with the prospects of the extant planning permission being implemented in full has to be established and must satisfy a decision maker that the the prospect of implementation is real and not merely theoretical: ***Snowden v. Secretary of State for the Environment*** [1980] JPL 749.
15. This principle has been consistently applied: see ***Brentwood v. Secretary of State for the Environment***⁵.
16. The issue was put very clearly in the judgment of George Bartlett QC (sitting as a High Court Judge) in ***South Buckinghamshire District Council v. Secretary of State for the Environment***⁶ when he said on Page 79F:

“In my judgment where, as in the present case, the decision-maker is deciding whether planning permission for the development applied for should be granted in order to avoid the greater harm that would result from the resumption of some particular lawful use of the application site, it is inescapably necessary that he should consider the likelihood of such resumption taking place. This is so, it seems to me, for two reasons. First, unless the resumption of the use is a realistic possibility, it would be Wednesbury unreasonable to treat the harm that would result from such resumption as a

⁴ Dated 21st March 2013.

⁵ [1996] 72 P&CR 61 at 65 by Christopher Lockhart-Mummery QC.

⁶ [1999] PLCR 72.

reason for granting permission for the new development. Secondly, the degree of probability of the use being resumed will, or at least may, be a material consideration, to be weighed by the decision-maker along with the harm that the use would cause and the other pros and cons of the new development proposed.”

17. What is conspicuously absent from Rossendale Borough Council’s consideration and what was described as “inescapably necessary” is any consideration of the likelihood of the extant planning permission being implemented.
18. The evidence in this particular case has clearly demonstrated that the likelihood of the extant planning permission being further implemented is profoundly remote.
19. Firstly, the analysis contained in Section 6 of the WML Structural Engineer’s report dated December 2015 (Appendix 2 to Document EL8.019.4) clearly demonstrates that this is a “problem site” with a large area of extant permission dismissed as areas incapable of being developed because of the ground conditions.
20. Secondly, where the WML Structural Engineer’s report considers the possibility of some development taking place, it is couched in extremely defensive terms. Paragraphs 6.25 and 6.26 state:

“In summary, WML conclude from the preliminary assessment that the western area of the site beyond the slope scar is suitable for development subject to further ground investigation.

It is considered that other areas of the site are not suitable for development although a further detailed ground investigation and slope stability assessment of the southern portion of Zone A may determine that development is possible, albeit with potentially a substantial degree of remedial measures.” [emphasis added]

21. This evidence is very far from demonstrating that a part of the site is capable of being developed. The “preliminary assessment” is “subject to further ground investigation.” The conclusion, on the evidence provided by Lindon, is that a large portion of the site is incapable of being developed because of ground conditions and a modest part of the site **may** be capable of being developed but that, at this moment in time, even

that conclusion would have to await further investigation. It is not clear whether that further ground investigation has been conducted. It is certainly the case that any such further investigation that established that the ground conditions permit the possibility of physical development has not been disclosed to the LPA and made public.

22. Thirdly, and crucially, DPP has made the point very clearly that the extant planning permission will not be implemented. This was set out in the letter dated 27th April 2020 and constitutes Appendix 1 to the LPA's Action 19.4 document (ref. EL8.019.4). This states:

"Subsequent to the events set out above occurring the nature of housebuilding and related demands for dwellings changed.

This saw there to be a demand for larger units and for a greater proportion of units to be developed as detached units as opposed to in the form of semi-detached or short terraces of properties as was the case with the permission that had been implemented at the site. Indeed, the density of the consented and part-built scheme is far higher than other schemes that were granted and developed around that period in other parts of Helmsshore/Haslingden, which in market terms was what purchasers appeared to want."

23. The letter continued:

"The key reasons the site was not pushed forward to date post the ending of works on the old permission is the fact that post the granting of the original and implemented planning permission the marketplace changed and the site was placed in Green Belt."

24. The response of Lindon was not to assert they would implement the planning permission but would use the fact of the existence of an extant permission as a platform to secure a "new acceptable scheme in numbers, layout and design terms."

25. DPP was thereby acknowledging that the permission granted in October 1972 was unacceptable in terms of "numbers, layout and design".

26. Thus it is very clear that the extant planning permission would not be implemented, reflecting as it does 1970s development that would be unattractive to the modern housing market and inconsistent with modern building standards.
27. Overall, the position can be summarised as follows:
- (a) To demonstrate a true “fallback” position it has to be demonstrated that not only does the land benefit from an extant permission that remains capable of implementation, it must also be demonstrated that the implementation of such is a real possibility or real likelihood;
 - (b) Whilst the existence of the extant planning permission is not in dispute, the LPA has not undertaken that which the law requires to be “inescapably necessary”; namely, to come to a judgment on the whether there is a real possibility or real likelihood of the extant permission being developed out;
 - (c) The extant permission remains unimplemented to its full extent despite its existence for very nearly 50 years;
 - (d) The site is known to be subject to geological faults. The majority of the units permitted by the extant permission are recognised to be incapable of being developed on the site;
 - (e) The “high watermark” of the case put forward is that there may be a possibility of part of the site that is capable of being developed for up to 50 units, but that is subject to a caveat that further investigation is required in order to establish that proposition. That further investigation has not been done notwithstanding the Structural Engineer’s advice was given six years ago;
 - (f) As with all “fall-back” permissions its existence does not oblige the LPA to take any action. Lindon can simply implement the October 1972 permission

as approved irrespective of its current status within the Green Belt if that was a realistic and commercially sensible action.

- (g) DPP have made it clear that the implementation of the October 1972 permission would not be a realistic and commercially sensible action. They have acknowledged that the extant planning permission in terms of numbers, layout and design is a product of its time in the 1970s and would not be attractive to the modern housing market or consistent with modern building standards. As such, the extant permission would not be developed.

Issues

28. As indicated above, there are two issues that require to be dealt with:

- (a) Release from Green Belt

29. The site was designated as part of the Green Belt subsequent to the grant of planning permission. That would not materially affect the developability of an extant permission in legal terms.

30. The LPA has not addressed its mind to the crucial question of whether there is a real likelihood of the extant permission being developed out. This is an essential requirement for a decision-maker.

31. The evidence before the Council in its capacity as LPA demonstrates that it would be extremely unlikely that the extant planning permission would be further implemented unless and until:

- (a) further investigatory work had been completed demonstrating that in engineering (and potentially viability) terms part of the site could developed to accommodate 50 units;

(b) that the implementation of the October 1972 planning permission is sufficiently attractive to the market that it would be built out in accordance with the extant permission. On the Lindon's own evidence, this is extremely unlikely.

(b) Contribution to Housing Supply

32. The Council's approach appears from document EL8.019.4 to make no changes to the Green Belt nor to allocate the site, but instead to contemplate that the extant permission is capable of contributing 50 units to the deliverable supply.

33. Substantially for the same reasons, the LPA needs to consider that the development of the site is a real possibility. Again for substantially the same reasons set out above the evidence suggests that it is unrealistic to anticipate that this site would contribute any units to the supply during the Local Plan period. It is only on the basis that a substantive change is made to the design and layout of the extant permission to meet modern market requirements (and after fully satisfying the ground stability issue) would it be capable of contributing anything whatsoever to supply. The recognition by Lindon that that exercise needs to be done demonstrates that it is unrealistic to assume the extant permission would ever be implemented.

34. The problem of the site contribution to deliverability is further compounded by the rather convoluted approach set out in document EL8.019.4 whereby it is now considered a site capable of contributing to supply provided that an application is submitted for a residential scheme two years after the adoption of the Local Plan. This idiosyncratic approach to the assessment of deliverability is flawed as it is not an assessment of the deliverability of the extant permission and simply puts off the decision that is required to be made on the basis of current evidence. On the current evidence the contribution of the site to deliverable supply should be "scrubbed out" - to adopt the words used by DPP.

Conclusion

35. I believe I have dealt with all the matters raised, but if I can assist further please do not hesitate to contact me.

[REDACTED]

JOHN BARRETT

Leeds and Birmingham

16th February 2021

TOWN AND COUNTRY PLANNING ACT 1990

ROSSENDALE LOCAL PLAN 2019-2034

**LAND AT MANCHESTER ROAD AND CLOD
LANE, HASLINGDEN**

OPINION

Hello

I submitted an objection to the local plans specific to Swinshaw Hall, but some of the generic comments about schools, primary care infrastructure and the issues with traffic and road congestion etc are all applicable to the local plan in general. I wanted to check that my specific objection counts against the local plan. Please can you confirm as I would like to register an objection

Thank you

Kaye

Sent from my Huawei phone

Further to the proposals detailed below, we have had various exchanges with your consultants since the plans were first proposed (Emails attached).



Subsequent to these we had a specific meeting with your appointed consultant and submitted further response to the plans back in January 2020 (also attached).

From looking at the documents now out to consultation it does not appear that any of our concerns have been taken on board or incorporated into revised plans, although it is hard to be specific as the handwritten notes on the plans are so faint that they are illegible.

We have previously outlined our concerns about the proximity of the proposed new road to the existing building and the impact of this on the welfare of staff and visitors to the station and we do not believe the plans drafted do anything to alleviate these concerns. Given the plans do not address this then our position has not changed from the initial one previously set out, in that we are not supportive of any of the proposals which impact on our site, and as such we wish our concerns to be included in any future deliberations.

Can you also confirm why we have not been consulted directly on this stage of the project, as with other stages, given the representations we have already made.

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]

 [Lancashire Fire and Rescue Service](#)
 [@LancashireFRS](#)
 www.lancsfirerescue.org.uk



Angie Ridgwell
Chief Executive Officer and
Director of Resources
Lancashire County Council
County Hall
PRESTON PR1 8XJ

Please ask for: Keith Mattinson
Telephone: [REDACTED]
Email: [REDACTED]
Your Ref: [REDACTED]
Our Ref: KM/JLW
Date: 27 January 2020

Dear Angie

ROSSENDALE GYRATORY HIGHWAY PLANS

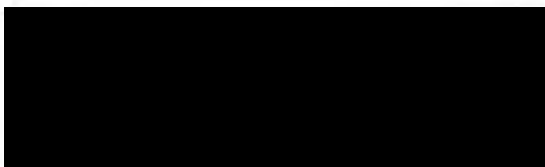
At this stage in the development I can confirm that we are happy to support the principles of the redevelopment works, namely:

- improved local network reliability
- faster and safer exit from the station for emergency vehicles to a point beyond the influenced area of change
- it would assist Rossendale's needs progressing into the future with higher traffic levels and likely increased emergency service demand as a consequence of delivery of development

We note that our initial concerns have been taken on board, resulting in a revised draft plan providing significantly greater gap between the revised road layout and the station (approx 42m), thus minimising any impact. This distance is significantly greater than that previously proposed and is more acceptable to us.

However I must advise that this support is subject to consideration of final proposals, as we remain firmly of the opinion that any change must have a minimal impact on the continued operation of the station and on the welfare of staff and visitors to the station. We would have major concerns if subsequent plans showed the new road layout closer than the latest sketch.

Yours sincerely



Keith Mattinson
Director of Corporate Services

Headquarters

Lancashire Fire & Rescue Service
Garstang Road, Fulwood
Preston
PR2 3LH



At this stage in the development I can confirm that we are happy to support the principles of the redevelopment works, namely

- improved local network reliability
- faster and safer exit from the station for emergency vehicles to a point beyond the influenced area of change
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However I must advise that this support is subject to consideration of final proposals, as we remain firmly of the opinion that any change must have a minimal impact on the continued operation of the station, and on the welfare of staff and visitors to the station We would have major concerns if subsequent plans showed the new road layout closer than the latest sketch.

I hope this is sufficient for your purposes.

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]



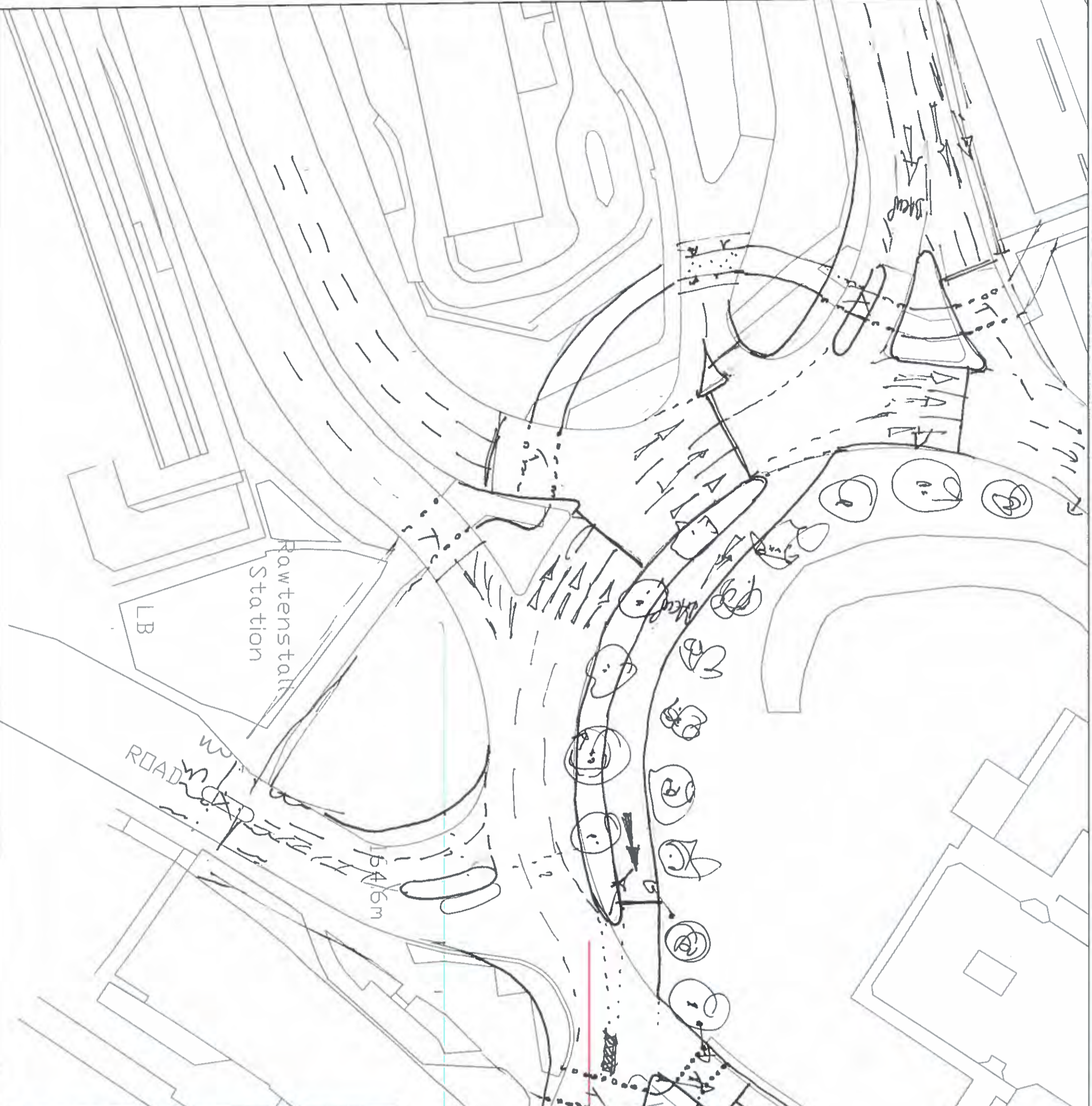
[Lancashire Fire and Rescue Service](#)



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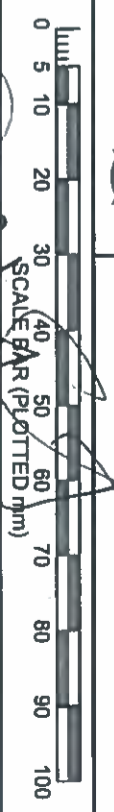
www.lancsfirerescue.org.uk



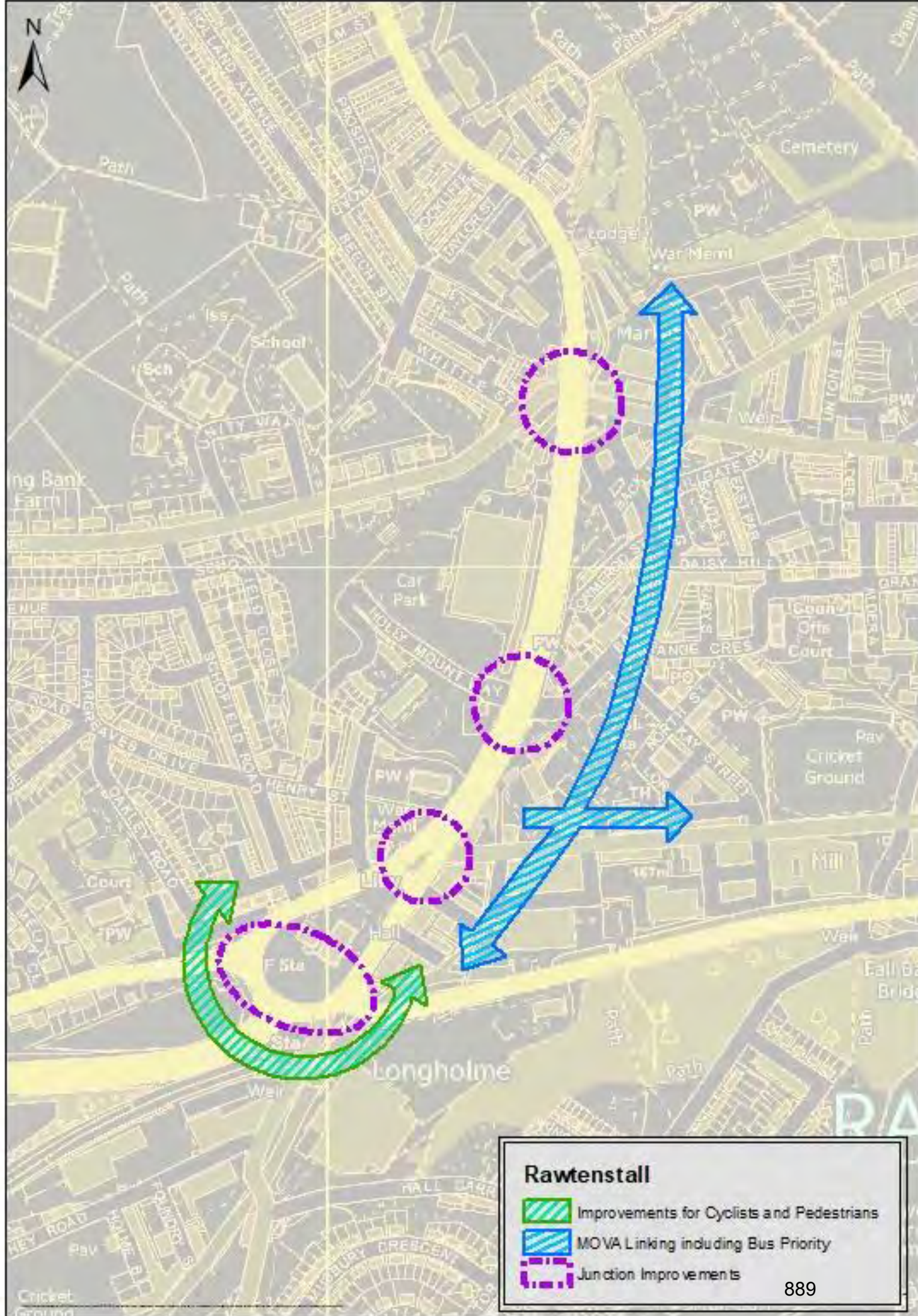
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REVISIONS									
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DRAWING TITLE		DWG TITLE 1 DWG TITLE 2							
DRAWN BY		DRAWN BY		CHECKED BY		CHECKED BY			
PPMS No.		PPMS NO.		DATE		DATE			
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Design and Construction



P:\1155P215BVD\AHM1\ADDN\DATA\1707\ITEM\ITEM.DWG M7 NYE2R141 71DM7 NYE2R141 NYE




Rawtenstall

-  Improvements for Cyclists and Pedestrians
-  MOVA Linking including Bus Priority
-  Junction Improvements

Further to my response below we have had a further meeting with Neil Stevens from LCC to discuss the options. We outlined our concerns about the proximity of the proposed new road to the existing building and the impact of this on the welfare of staff and visitors to the station and he has agreed to undertake more work to consider alternative positions/layouts for any road across our existing site. Once he has drafted these a further meeting will be held.

However for the time being I can confirm that our position has not changed from the one set out below, in that we are not supportive of any of the proposals which impact on our site.

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]

 [Lancashire Fire and Rescue Service](#)

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 www.lancsfirerescue.org.uk

From: SHQ - Mattinson, Keith
Sent: 19 August 2019 10:26
To: 'tonyblackburn@rossendalebc.gov.uk'
Cc: SHQ - Riding, Ian; AM - Morgan, Steven; SM - Hargreaves, Gary
Subject: ROSSENDALE PLAN

Please see our response below in connection with the proposed hearings relating to Rossendale Local Plan

With reference to Matter 7 – Infrastructure delivery

Is the Rawtenstall Gyratory deliverable?

We believe this is one for the Council to answer, however we do not believe that the options have included any costs or practicalities associated with the works required to relocate the Fire station, and we believe this is a fundamental consideration in determining the most appropriate option.

Have the concerns of Lancashire Fire and Rescue been addressed?

It is worth re-affirming our position as previously reported to the council which has partly been incorporated into the revised plan in section 8.2.2:-

The station meets the needs of our demand profile, with current front-line provision and associated crewing arrangements at the site aligned to this. Both the station and the accommodation block are in good condition based upon our current requirements (with minimal planned expenditure in the next 5 years). Within the scope of our Integrated Risk Management Plan (IRMP) 2017-22, Rawtenstall Fire Station has been considered most recently during the Emergency Cover Review 2017 (a strategic evaluation of our assets and front-line resources within Lancashire.). These re-affirmed that the location continues to provide the most suitable base from which to meet our emergency response standards for Rawtenstall and the surrounding area. This considers further, the requirement for Retained Duty System firefighters to respond to the site within five minutes of receiving an emergency call, and it is worth emphasising that the scope to continue doing this from any alternative site would severely limit any relocation options.

As such we have no need to relocate the station and are therefore concerned that the plans could result in such a requirement.

Therefore our expectation should the plans go ahead would be that the council identified suitable alternative locations, and met any and all costs associated with providing a new facility. This position is partly reflected in section 8.2.2 of the RBC Infrastructure Delivery Plan March 2019 “Rawtenstall Fire Station continues to meet the needs of Lancashire Fire Rescue in terms of delivering the fire and rescue service across Rossendale. It is a requirement that Retained Duty System firefighters are able to respond within five minutes of receiving an emergency call, which severely limits the scope for relocation of the service. As such, future plans for the Gyratory (as per Chapter 4) will need to fully consider the locational needs for fire cover.”

Furthermore the Plan does references the potential £4.5 million costs associated with relocating the fire station on page 48 but does not include any land and utility.

But we have not seen any updated costed options which include relocation costs, nor any acknowledgement that these would be met by the council. Nor do we feel that the plans adequately reflect the responsibility of the council to identify suitable alternative locations.

Can the scheme be delivered with the Fire Station remaining in place?

Options 1 – 4 RBC Infrastructure Delivery Plan March 2019 Update retains the fire station in its present position, however it moves the road network to run alongside the existing station and accommodation block. We do not feel there is sufficient information to give a detailed response as to the suitability of any of these options, but we have major concerns about the proximity of the proposed new road to the existing building and the impact of this on the welfare of staff and visitors to the station.

If not has a strategy been agreed for its relocation which includes funding and timing?

We do not believe a suitable funding strategy has been agreed, the plans whilst referencing potential relocation costs exclude any site acquisition cost and are silent on who is responsible for these costs. Nor do the Plans reference whether suitable alternative sites are likely to be available or whose responsibility it is to identify them. In terms of timing it is too early to say what these are but we have not seen any indicative timeframes for any potential relocation, and our experience would suggest that identifying alternative sites and relocation to these is an extremely lengthy process.

In terms of the specific options outlined in the plans we have the following comments:-

- Options 5 - 8 RBC Infrastructure Delivery Plan March 2019 Update relocates the fire station within the revised site layout. Without detailed plans it is impossible to accurately say what impact this will have however we have major concerns about this option and the space that it provides for car parking, training, storage as well as the close proximity of the revised road layout and the impact this has on the welfare of staff and visitors. Furthermore it appears that some elements of the new build require demolition of the existing facility and therefore consideration would need to be given about maintaining the site as an operational fire station whilst works are undertaken. The difficulty this creates has not been referenced within the plans. Should any of these options progress there would be significant cost in demolishing the existing station and building a new one, we have estimated approx. £4.5m, and no budget has been allocated for this within the Plan.
- Options 9 - 16 RBC Infrastructure Delivery Plan March 2019 Update requires the fire station to be relocated to a new site. Without identifying alternative sites it is impossible to comment on the suitability of these options. However our concerns would be about suitability of the site in terms of size and layout to support our requirements, location to tie in with Fire risk within the surrounding area and location in terms of the ability of our on-all personnel to attend station within 5 minutes of a mobilisation. Should any of these options progress there would be significant cost in relocating including site acquisition, we would estimate in the region of £5.5m, and no budget has been allocated for this within the Plan.


Is there an overall strategy which demonstrates the Rawtenstall Gyrotory is deliverable and when it would be likely to be delivered?

We believe this is one for the Council to answer

What would be the implications for the Local Plan if this scheme was not delivered on time or at all?

We believe this is one for the Council to answer

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]




 [Lancashire Fire and Rescue Service](#)

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 www.lancsfireandrescue.org.uk

Sorry I have just looked at the Highway Capacity Report and with specific reference to the preferred options shown on page 85 we do not feel the existing fire station would be a viable under any of these. As such we would seek your earliest confirmation that, should you go ahead with your plans, you would identify a suitable alternative location and would meet the full cost of providing a new facility. Failure to do so would significantly impact on fire cover for Rawtenstall and the surrounding area.

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]

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 www.lancsfirerescue.org.uk

From: SHQ - Mattinson, Keith
Sent: 18 October 2018 15:46
To: 'Forward Planning'
Cc: AM - Morgan, Steven; SM - Hargreaves, Gary
Subject: RE: Rossendale Local Plan Consultation ends Friday 5th October




Further to my email below we have now held the meeting with Council Officers and wish to re-affirm our position as follows:-

The station itself dates back to 1989, with an accommodation block being added in 2011. The station meets the needs of our demand profile, with current front-line provision and associated crewing arrangements at the site aligned to this. Both the station and the accommodation block are in good condition based upon our current requirements (with minimal planned expenditure in the next 5 years). Within the scope of our Integrated Risk Management Plan (IRMP) 2017-22, Rawtenstall Fire Station has been considered most recently during the Emergency Cover Review 2017 (a strategic evaluation of our assets and front-line resources within Lancashire.). These re-affirmed that the location continues to provide the most suitable base from which to meet our emergency response standards for Rawtenstall and the surrounding area. This considers further, the requirement for Retained Duty System firefighters to respond to the site within five minutes of receiving an emergency call, and it is worth emphasising that the scope to continue doing this from any alternative site would severely limit any relocation options.

As such we have no need to relocate the station and are therefore concerned that your plans could result in such a requirement. If that was the case we would need re-assurance that you would identify a suitable alternative site that met our emergency response requirements as determined within the IRMP and would meet any costs of providing a new facility to the same standard as our existing facilities. Clearly this would have significant cost implications and we would expect these to be met by the Council.

Thank you

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]

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 www.lancsfirerescue.org.uk

From: SHQ - Mattinson, Keith
Sent: 05 October 2018 10:42

To: 'Forward Planning'
Subject: RE: Rossendale Local Plan Consultation ends Friday 5th October

Please accept this as our formal response to the consultation.

We have no comments to make about the overarching forward plan, other than a concern about the impact of any new housing on the requirements for suitable hydrants, and specifically who will fund the installation of these.

However our main area of concern relates to the project to improve the Gyrotory system. As you are aware Rawtenstall Fire Station sits on the roundabout at the heart of the Gyrotory system, and we are extremely concerned that your proposals referenced in the Local Plan and the Highway Capacity Study potentially include a need to relocate the station.

The station itself dates back to 1989, with an accommodation block being added in 2011. Both the station and the accommodation block are in good condition and meet our current requirements (with minimal planned expenditure in the next 5 years). The location itself also provides a suitable base from which to meet our emergency response standards for Rawtenstall and the surrounding area. As such we have no need to relocate the station and are therefore concerned that your plans could result in such a requirement. We have a meeting scheduled for next week to discuss this further, but clearly if that was the case we would need re-assurance that you would identify a suitable alternative site that met our response requirements and would meet any costs of providing a new facility to the same standard as our existing facilities. Clearly this would have significant cost implications and we would expect these to be met by the Council.

Hopefully we will be able to clarify some of this at our meeting next week, following which we may be in a position to provide a further update.

Thank you

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]



[Lancashire Fire and Rescue Service](#)



[@LancashireFRS](#)



www.lancsfireandrescue.org.uk

From: Forward Planning [<mailto:forwardplanning@rossendalebc.gov.uk>]
Sent: 05 October 2018 09:25
To: SHQ - Mattinson, Keith
Subject: RE: Rossendale Local Plan Consultation ends Friday 5th October

Good morning,

Yes, an email submission is fine, as long as you submit it before midnight today.

Kind regards,

Nat

Nathaele Davies
Planning Assistant

Forward Planning | Room 120 | The Business Centre | Futures Park

Bacup | Lancashire | OL13 0BB

Tel: [REDACTED]

Web: www.rossendale.gov.uk/

Twitter: [@RossendaleBC](https://twitter.com/RossendaleBC)

Facebook: [Rossendale Borough Council](https://www.facebook.com/RossendaleBoroughCouncil)

Visit Rossendale: <http://www.visitrossendale.com/>

The Local Plan Consultation is open until Friday 5th October 2018. [Find out more](#)



From: SHQ - Mattinson, Keith [REDACTED]

Sent: 05 October 2018 09:21

To: Forward Planning

Subject: RE: Rossendale Local Plan Consultation ends Friday 5th October

Hi rather than fill in the online survey for the forward plan (much of which is not relevant to our comments) can you confirm that I can simply submit an email about the relevant elements of the plan

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel [REDACTED]

 [Lancashire Fire and Rescue Service](https://www.facebook.com/LancashireFireandRescueService)

 [@LancashireFRS](https://twitter.com/LancashireFRS)

 www.lancsfireandrescue.org.uk

From: Forward Planning [<mailto:forwardplanning@rossendalebc.gov.uk>]

Sent: 04 October 2018 15:25

To: SHQ - Mattinson, Keith; Forward Planning

Cc: AM - Morgan, Steven; SM - Hargreaves, Gary; Nathaele Davies

Subject: RE: Rossendale Local Plan Consultation ends Friday 5th October

Hi Keith,

Yes I spoke to Gary this morning. You will need to submit a formal response tomorrow to the consultation but you can include within this a reference to the on-going discussions that are taking place between the Fire & Rescue Service and Rossendale Borough Council and that you may submit further representations as appropriate, depending on the outcome of these discussions.

This will alert the Planning Inspector that there may be further correspondence between us on the Local Plan.

As I mentioned we have now published the Highway Capacity Study on the website, which is available to view at

https://www.rossendale.gov.uk/downloads/download/11031/highways_capacity_study

Hope this helps, and I look forward to meeting you next week,

Anne

Anne Storah
Principal Planner (Forward Planning)
Rossendale Borough Council

Direct dial: [REDACTED]

Rossendale Borough Council
Room 120
The Business Centre
Futures Park,
Bacup,
OL13 0BB.

Web: www.rossendale.gov.uk

Twitter: [@RossendaleBC](https://twitter.com/RossendaleBC)

Facebook: [Rossendale Borough Council](https://www.facebook.com/RossendaleBoroughCouncil)

Visit Rossendale: <http://www.visitrossendale.com/>

Local Plan: www.rossendale.gov.uk/localplan



From: SHQ - Mattinson, Keith [REDACTED]
Sent: 04 October 2018 12:50
To: Forward Planning
Cc: AM - Morgan, Steven; SM - Hargreaves, Gary
Subject: FW: Rossendale Local Plan Consultation ends Friday 5th October

Further to this consultation, you make reference to the discussions with the Fire Service in your Duty To Co-Operate Statement in which you state "Discussions have taken place with Lancashire Fire and Rescue Service and these are expected to continue further to ensure Rawtenstall Fire Station is provided for adequately within the Local Plan given the potential transport implications and its location on the large roundabout in Rawtenstall (known as the Gytratory)" These discussions are still on-going with a meeting planned for next week. I understand that my colleague (Gary Hargreaves) has contacted your department to seek re-assurance that the outcome of these discussions will still be

considered as part of the formal consultation process and was advised to submit a holding response referencing this. As such can you please confirm that we will be able to submit a formal response following this meeting and that this will still form part of the consultation process, despite it being after the current 5 October deadline.

Thank you

Keith Mattinson
Director of Corporate Services
Lancashire Fire & Rescue Service
Tel: [REDACTED]



[Lancashire Fire and Rescue Service](#)



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www.lancsfireandrescue.org.uk

From: Forward Planning <forwardplanning@rossendalebc.gov.uk>
Date: 2 October 2018 at 12:18:29 BST
To: Undisclosed recipients;;
Subject: **Rossendale Local Plan Consultation ends Friday 5th October**
Reply-To: Forward Planning <forwardplanning@rossendalebc.gov.uk>

Hello,

This is a reminder that the Local Plan consultation will end this Friday 5th October 2018 at midnight. Thank you if you have already submitted your comments, they are being processed. If you wish to submit your comments, please note the closing date is Friday 5th October, any comments received after midnight on that day will not be considered. To view the consultation documents and make representations please visit www.rossendale.gov.uk/localplan.

The consultation on the [Statement of Community Involvement](#) will also end on Friday 5th October.

Please note that the Rossendale Local Plan Highways Capacity Study has now been published on the Council's website. The final consultants' report is available to view here: https://www.rossendale.gov.uk/downloads/download/11031/highways_capacity_study. The Council will discuss the outcomes of the study with the relevant highways authorities.

Kind regards,

Forward Planning Team

Forward Planning | Room 120 | The Business Centre | Futures Park
Bacup | Lancashire | OL13 0BB
Tel: [REDACTED]

Web: www.rossendale.gov.uk/

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The Local Plan Consultation is open until Friday 5th October 2018. [Find out more](#)

Your Ref :
Our Ref : 2021-03-23 LPA
Date : 23 March 2021

m/
e/

Anne Storah
Principal Planner (Forward Planning)
Rossendale Borough Council
Futures Park
Bacup
Rossendale
OL13 0BB

BY EMAIL ONLY: [REDACTED]

Dear Anne,

**ROSSENDALE LOCAL PLAN 2019 – 2034
CONSULTATION ON EXAMINATION LIBRARY 8 (SECOND TRANCHE)
HASLINGDEN CRICKET CLUB - LOCAL PLAN POLICY H52
RESPONDENT NUMBER 5195**

Following our meeting today and as agreed and requested by you, this brief letter is submitted to the consultation on Examination Library 8 and confirms that my clients are working with you and the relevant statutory consultees in relation to the above site. It is unfortunate that the dialogue between the Council and ourselves has only recently been commenced but I reiterate our commitment to working to a deliverable solution for the site to present to the Inspectors.

As originally written and now re-drafted, draft Policy H52 and the associated allocation cannot be delivered, for the reasons already set out in our extensive submissions. Specifically, the current allocation is subject to a restrictive covenant that prevents its development in isolation and therefore protects the club in perpetuity. Our proposed mixed-use policy seeks to facilitate a new pavilion and changing facilities, the retention of the cricket pitch, a replacement practice strip at Haslingden High School all to be subsidised by the provision of much needed new houses. Dealing with the site holistically, in a plan-led manner, is entirely consistent with national planning policy set out in the Framework¹.

I reserve the right to make further submissions and look forward to hearing from you soon.

Yours sincerely

[REDACTED]

DANIEL CONNOLLY BA (Hons) DipTP MRTPI

¹ Paragraph 15.

Dear Sirs & Madam

I understand that the council is considering changing the urban boundary on land behind The Holden Arms on Grane Road, Haslingden; the purpose being to free land for building 130 new homes. I wish to object - to both the change of the urban boundary and to the proposed new building. My reasons are as follows:

URBAN BOUNDARY: The purpose of this is to contain development within it and to preserve areas outside the boundary in its natural state. At a public inquiry in 1993 a Government inspector ruled the site should remain undeveloped. I wonder why councillors should now think otherwise?

WILDLIFE AND COUNTRYSIDE Act 1981: This protects ALL birds as well as other protected species such as bats, along with flora and fauna. Has an Extended Phase One Survey been carried out to look for species with special attention to the barn stone walls, hedgerows, ditches, trees - as well as the grassland?

TRAFFIC:

130 New homes will, of necessity, mean that most will have 2 cars, meaning a massive increase in the volume of traffic on Grane road. The section from The Holden Arms down to the Motorway/bypass is already congested with traffic. Parked cars line both sides of the road causing a driving hazard. A potential increase of 260 cars using that road for return journeys each day is bound to create further problems regarding congestion and safety.

SCHOOLS & HEALTH CARE:

How will schools cope with extra intake? And can doctors and dentists take on new patients? It is already difficult to find a dentist - either NHS or private.

FLOODING:

1) The developer proposes to install attenuation chambers but this won't work, because there is constant flow of ground water and the attenuation chambers would be completely full from ground water and normal rain fall.

So when there was a large downpour, the whole lot would overflow and go straight into the River Ogden, almost guaranteeing floods in Helmshore and Irwell Vale." Quote by Tony Hodbod.

2) **HOLCOMBE ROAD** - from the Holden Arms down to the bend at Holden Vale - is already a problem area after heavy rain. There is massive run off from the fields onto the road on the opposite side to the proposed site. The drains are either blocked or cannot take the excess water, and the road gets flooded! This is a long-standing problem but is now happening on a regular basis as our climate changes.

The possibility of clearing the proposed development site of all the grassland and replacing it with concrete and tarmac really doesn't bare thinking about. The land is always sodden, which is what makes it such a special habitat for nature. But take away this 'sponge' and where will the water go? Replacing new grassed areas will not make up for the initial loss.

The National Trust are currently working on the moors above Helmshore to create flood management to stop the water running down the hillside. So why is RBC thinking of ripping out a wonderful, natural habitat that already serves such a purpose!

TAYLOR-WIMPEY:

Quote: "Aside from the infrastructure and environmental benefits ... " What benefits are they referring to? I see none.

Taylor Wimpey refers to their 'Construction Environmental Management Plan (CEMP). The purpose of this is to minimise the environmental impact on wildlife during construction. But as the whole site is to be stripped, this is meaningless.

I ask that the councillors of Rossendale Borough Council represent the wishes of the local people and withdraw the suggestion of changing the Urban Boundary and also refuse planning permission.

Thank you.

Yours faithfully
Arlene Harris

I write in reference to planning submissions H43,H44 and H45 located in the village of Weir.

Having lived in this village since the day I was born ■ years ago, I've sat and watched yet more and more of the fields and country side that is full of wildlife I played in as a child get developed into housing estates.

This village is now bursting at the seams, there's cars parked all over the place, people are parking on streets they don't even live on...

How anyone can contemplate this village being able to handle 52 more houses is beyond me, we have 1 small primary school, no shops....

I would like to appose all 3 planning submissions.

There is plenty of places to build for these developers, but there driven by greed and maximum return with zero regard for people that already live here.

Mr Dickinson.