

PT/190506
20 January 2021

Ms H Leach
Principal Planner
Bury Council
Knowsley Place
Knowsley Street
Bury
BL9 0SW

Dear Helen,

PROPOSED RESIDENTIAL DEVELOPMENT, FORMER HOLCOMBE MILL SITE, RAMSBOTTOM PLANNING APPLICATION REFERENCE - 65844

I am writing on behalf of the applicant Eccleston Homes in relation to the above proposed development.

We understand that Transport for Greater Manchester (TfGM) have reviewed the planning application and confirmed that they have no objection, subject to a Section 106 contribution of £110,000 towards improvement works at the Bury New Road / Manchester Road traffic signal junction. Whilst we are pleased to note that there is no objection to the scheme, we do have concerns with the level of contribution being requested.

As you will be aware, all financial contributions that are to be provided by way of Section 106 Agreement will need to demonstrably meet the core legal tests set out at Regulation 122 of the Community Infrastructure Levy (CIL) Regulations in ensuring that those are:-

- (a) necessary to make the development acceptable in planning terms;*
- (b) directly related to the development; and*
- (c) fairly and reasonably related in scale and kind to the development.*

It is our firm opinion that, based on the scale of development proposed and lack of a highway impact at the Bury New Road / Manchester Road junction, no improvements are necessary and the requested contribution does not meet the above legal tests.

Scale of Development and form of Assessment

The proposed development comprises a residential development of 72 dwellings, including the conversion of the existing buildings on the site to 5 no. residential properties. Based on the widely accepted thresholds contained in the Department for Transport (DfT) *Guidance on Transport Assessment* document, this scale of development should only need to be supported by a Transport Statement type report. The reason being that developments of this scale have limited transport impacts and, therefore, detailed capacity assessments of off-site junctions are not normally required.

Notwithstanding this, in response to TfGM's comments on a previous application on this site, detailed capacity assessments were undertaken in order to quantify the impact of the development on the Bury New Road / Manchester Road junction, the results of which are discussed below.

Anticipated Highway Impact

The trip generating potential of the development was estimated using the industry-standard TRICS Database, with the estimated vehicle trips being distributed on the network using travel to work census data. This demonstrates that at all off-site junctions, including the Bury New Road / Manchester Road junction, the development will result in an increase of less than 30 two-way trips during the AM and PM peak hours. As confirmed in the DfT's Guidance on Transport Assessment document, an increase of less than 30 trips at a junction is not material.

Detailed capacity assessments of the A56 Manchester Road / Bury New Road junction were undertaken using LINSIG software, with the results of the 'with' and 'without' development scenarios summarised in the table below

Link	2025 Without Dev Scenario				2025 With Dev Scenario			
	AM PEAK		PM PEAK		AM PEAK		PM PEAK	
	DoS	MMQ	DoS	MMQ	DoS	MMQ	DoS	MMQ
A56 Manchester Road (North) Ahead	83.4%	16.7	30.1%	4.2	83.4%	16.7	30.1%	4.2
A56 Manchester Road (South) Ahead Left	74.2%	13.5	92.8%	32.3	74.8%	13.7	94.1%	34.5
Bury New Road Left Right	82.9%	18.0	89.2%	11.3	84.9%	19.0	91.4%	12.3
PRC (%):	8.0%		-3.1%		6.0%		-4.5%	

The above demonstrates that in a future assessment year of 2025 the A56 Manchester Road (South) link is operating over the 90% threshold during the PM peak period, without the proposed development in place. However, this is an existing issue and with the additional traffic generated by the development there will be only a very slight increase in the DoS and queue lengths when compared to the without development scenario. The greatest increase in queues occurs on the A56 Manchester Road (South) link during the PM peak period where there is an increase of only 2.2 PCU. This will be imperceptible and well within the day to day variation in queue lengths experienced at a junction of this type.

Summary

In summary, the analysis submitted with the application and summarised in this letter clearly demonstrates that the development will not have a material impact on the operation of the Bury New Road / Manchester Road traffic signal junction. On this basis no improvements can be justified or viewed as being necessary to make the development acceptable in planning terms. The requested contribution does not therefore meet the core legal tests set out at Regulation 122 of CIL.

It should also be noted that the site has historically accommodated industrial uses which would have generated significantly greater levels of traffic including HGV movements and that a residential development represents a significant betterment to the conditions that would have previously existed when the site was in last use

I trust that the above is afforded full consideration in your assessment of the requested S106 contributions. Please do not hesitate to contact me if you require any additional information.

Yours sincerely



Peter Todd
Technical Director
On behalf of SCP
peter.todd@scptransport.co.uk