

Appeal Statement Dealing with Highway Matters

**Proposed Residential Development
Former Mondi/Holcombe Mill, Bridge Street, Ramsbottom**

Prepared for: Eccleston Homes Limited

June 2022

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1.0 QUALIFICATIONS AND EXPERIENCE OF AUTHOR

- 1.1 My name is Peter Todd. I am Technical Director at SCP, Transportation Planners and Infrastructure Designers, with offices in Manchester, Leeds and Chelmsford.
- 1.2 I hold an MSc in Transport Engineering and Planning and am also a member of the Chartered Institute of Highways and Transportation. I have almost 18 years' experience in providing transport and highways advice on development related matters for a range of developments.
- 1.3 I am familiar with the Appeal site and the surrounding area, with SCP having prepared the Transport Assessment and Travel Plan in support of the planning application.
- 1.4 I can confirm that the evidence I have prepared and provided for this Appeal in this Statement represents my true and professional opinions.

2.0 INTRODUCTION

Background

- 2.1 A planning application (Reference: 65844) was submitted to Bury Council on 14th August 2020, for a residential development comprising the erection of 73 no. dwellings including the retention and conversion of 2 existing buildings to residential use (5 no. units), the retention of a chimney and the demolition of a derelict building, together with engineering operations.
- 2.2 The planning application was accompanied by a detailed Transport Assessment and Travel Plan dated August 2020. The Transport Assessment concluded that the development could be safely accessed, is well located in terms of its accessibility by all the major non-car modes of transport and the traffic generated by the development could be accommodated on the local highway network.
- 2.3 The Transport Assessment was reviewed by Bury Council, as Local Highway Authority, and Transport for Greater Manchester (TfGM). The Local Highway Authority raised no highway objection to the application subject to a number of conditions relating to highway alterations to the existing access and footway on Bridge Street, a construction traffic management plan, a travel plan, a scheme for the management and maintenance of the internal estate road, visibility splays and car parking / cycle storage, all of which are relatively standard conditions and acceptable to the Appellant.
- 2.4 TfGM raised initial concerns in relation to the impact of the development at the Bury New Road / Manchester Road traffic signal junction. Whilst no objection was raised by TfGM, a Section 106 contribution of £110,000 was requested for the upgrading of the Bury New Road / Manchester Road traffic signal junction to provide MOVA control, which would increase capacity and improve the operation of the junction.
- 2.5 There was a difference of opinion between the Appellant and TfGM in relation to the level of impact at this junction and whether the requested contribution was justified and met the core legal tests set out at Regulation 122 of the Community Infrastructure Levy (CIL) Regulations. However, following a viability assessment the Appellant agreed to pay the requested contribution which resulted in the application being recommended for approval to Bury Council's Planning Committee.
- 2.6 Notwithstanding this position, the application was refused for two reasons on 7th June 2022, with reason for refusal one relating to the highway matters, as summarised below:-

‘1. The proposal would be an intensification of the use of a site, which would be detrimental to road safety and maintaining the free flow of traffic. The proposed development therefore conflicts with the following policy(ies) of the Bury Unitary Development Plan:

Policy HT4 - New Development

Policy H2/2 - The Layout of New Residential Development

2.7 Whilst it is accepted that committee members do not have to follow the advice of their senior professional officers, should they deviate from officer’s recommendations they should have substantive planning reasons and technical evidence to support their decision. This was not the case with this application.

2.8 This Appeal Statement has been prepared to address the above reason for refusal.

Structure of Appeal Statement

2.9 The structure of this statement is provided below:-

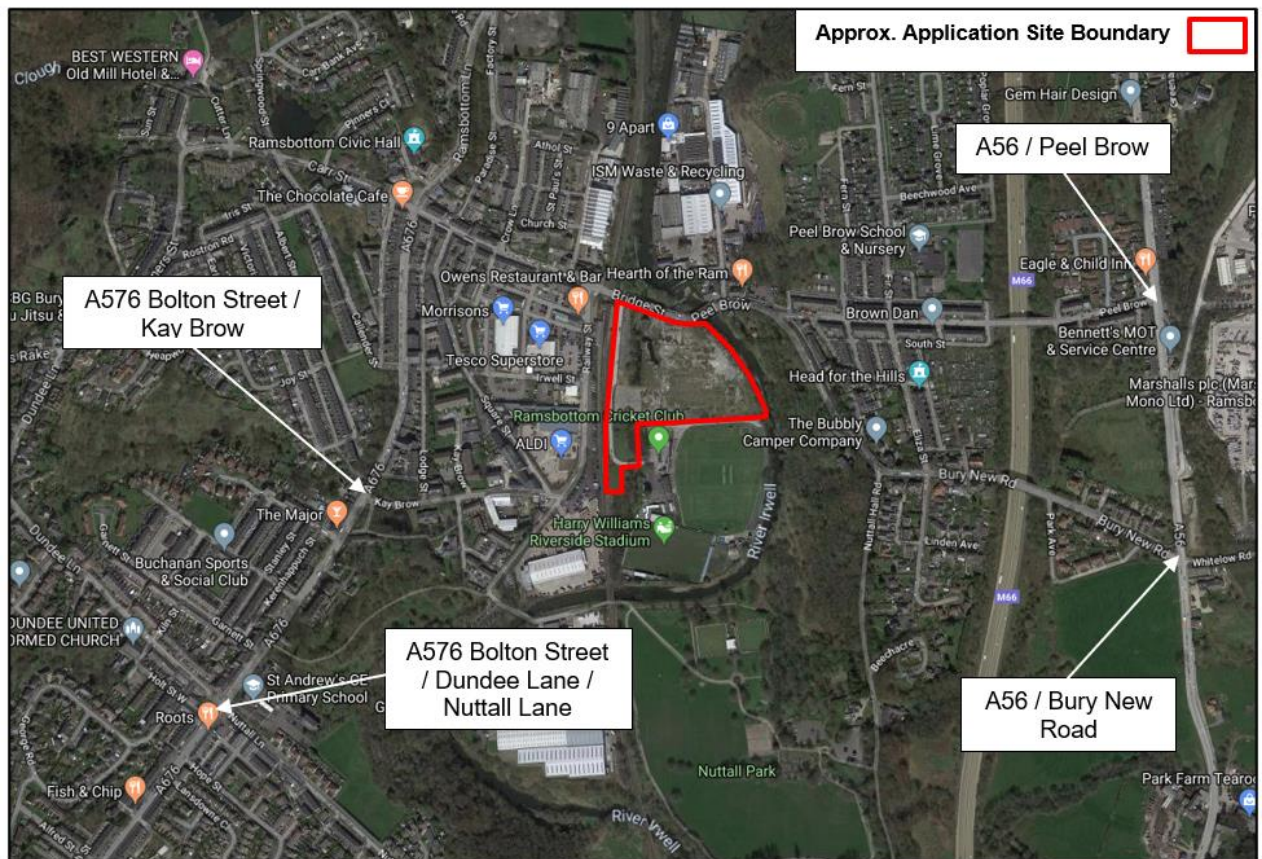
- Chapter 3 – summarises the Appeal particulars, including a description of the existing site, planning history and development proposals;
- Chapter 4 – presents an assessment of the trip generating potential of the proposed development and impact on the operation of the local highway network; and
- Chapter 5 – summarise the transport-related policies referenced in the reason for refusal one and sets out the case for the Appellant.

3.0 APPEAL PARTICULARS

Site Location and Existing Conditions

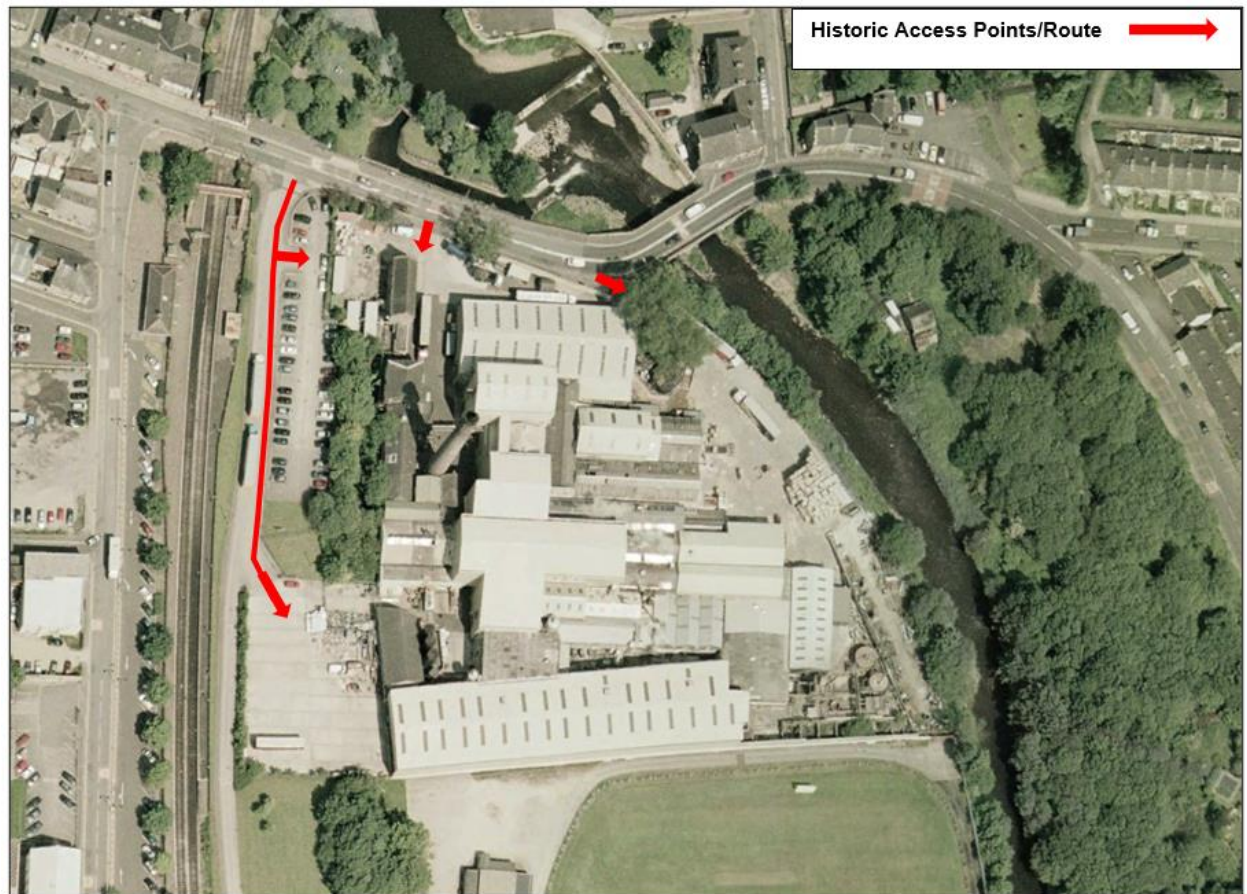
- 3.1 The Appeal site is located to the south of Bridge Street/Peel Brow on the eastern edge of Ramsbottom town centre, as shown on **Figure 3.1** below.

Figure 3.1 – Site Location



- 3.2 The application site comprises previously developed land that formerly accommodated the Holcombe Paper Mill, which closed in 2008 and was substantially demolished in 2013. Currently the site consists of an area of hard-standing, the former Holcombe Mill chimney stack and three buildings associated with the former mill.
- 3.3 Vehicular access to the site historically took place from Bridge Street/Peel Brow via three priority-controlled accesses, located to the north-west and north-east of the site and centrally along the sites frontage, as shown on **Figure 3.2** below. The western access is currently in use and serves Ramsbottom Cricket Club and Harry Williams Riverside Stadium, located to the south of the site.

Figure 3.2 – Existing Site Access Arrangements



3.4 The Transport Assessment considered a relatively extensive study area, including the following junctions, which are shown on **Figure 3.1** earlier.

- Proposed site access;
- A56 Whalley Road / A56 Manchester Road / Peel Brow;
- A56 Manchester Road / Bury New Road;
- A576 Bolton Street / Kay Brow; and
- A576 Bolton Street / A576 Bolton Road West / Dundee Lane / Nuttall Lane

3.5 Manual classified turning count traffic flow surveys were undertaken at the above junctions on Wednesday 3rd July 2019, pre-COVID, between the hours of 07:00 - 09:30 and 16:00 - 18:00. These surveys were used in the highway impacts assessments presented in the Transport Assessment, which were not disputed by either Bury Council or TfGM. I will return to the topic highway impact later in this Appeal Statement.

Highway Safety

- 3.6 The Personal Injury Accident data for the local highway network was assessed in the Transport Assessment for the most recently available five-year period ending 31st December 2019. The Transport Assessment concluded that, based on the relatively low number of accidents that occurred in the study area and their severity, the existing accident record did not represent a material concern in the context of the proposed development. It should be noted that Bury Council, as Local highway Authority, or TfGM did not raise any concerns with regards to highway safety with this application.
- 3.7 For the purpose of this Appeal, updated accident data has been obtained from the online resource Crashmap covering the most recently available five-year period ending June 2021. The location and severity of any accidents within the study area during this period are presented in **Appendix PT1** and a summary of the number and severity of the accidents at each junction/link in the study area is presented in **Table 3.1** below.

Table 3.1 – Personal Injury Accident Data Summary

Junction/Link	Fatal	Serious	Slight	Total
Bridge Street / Peel Brow Link	0	0	0	0
Bury New Road Link (between Peel Brow and A56)	0	0	0	0
Railway Street / Kay Brow Link	0	0	0	0
A676 Link (between Kay Brow and Dundee Lane / Nuttall Lane)	0	0	2	2
A56 Whalley Road / A56 Manchester Road / Peel Brow Junction	0	0	3	3
A56 Manchester Road / Bury New Road Junction	0	0	1	0
A576 Bolton Street / Kay Brow Junction	0	1	0	1
A676 Bolton Street / A676 Bolton Road West / Dundee Lane / Nuttall Lane Junction	0	0	1	1

- 3.8 As can be seen from the above no accidents occurred in the immediate vicinity of the site, on either Bridge Street or Peel Brow over the 5-year study period. Of the junctions assessed in the study area, all experience relatively low accident rates, with an average of less than one accident per year at all junctions. In addition, the majority of the accidents that occurred were of slight severity. By any measure, this road safety record is enviable and compares very favourably with other parts of the road network in Bury and elsewhere. I will return to the topic of road safety later in this Appeal Statement.

Development Proposals and Access Arrangements

- 3.9 The Appeal proposals comprise of a residential development of 73 no. dwellings including the retention and conversion of 2 existing buildings to residential use (5 no. units), the retention of a chimney and the demolition of a derelict building, together with engineering operations.
- 3.10 Vehicular access to the development will be provided off Bridge Street via the existing access to the north-west of the site, as shown on drawing number SCP/190506/SK01 Rev E, presented in **Appendix PT2**. The access has been designed to typical residential standards measuring 5.5m in width and benefits from 6m corner radii and 2m footway on the eastern side of the road which connect the site to the existing pedestrian infrastructure on Bridge Street. The remaining two existing accesses, located to the north-east of the site and centrally, will be closed and the footway reinstated.
- 3.11 Junction visibility from the site access has been provided in accordance with the visibility requirements set out in the MfS for a 30mph road, providing visibility splays that have an 'x' (minor arm setback distance) of 2.4m and a minimum 'y' (major road visibility) distance of 43m in both directions. The achievable visibility splays are shown on drawing number SCP/190506/SK01 Rev E, presented in **Appendix PT2**, which has been prepared on a topographical survey.
- 3.12 An independent Stage One Road Safety Audit (RSA) of the access arrangement was undertaken and presented in the Transport Assessment with no significant safety issues being identified. However, the RSA did recommend the introduction of 'keep clear' and give way markings at the access to stop queuing vehicles from blocking the access and to inform drivers to give way, along with the introduction of dropped kerbs and tactile paving at the access to prevent Non-Motorised Users from slipping/falling. Both of these recommendations have been accepted and are shown on the site access drawing.
- 3.13 In addition to the above, a secondary emergency access will be provided off Bridge Street. This will take the form of a pedestrian / cycle access, which will be controlled through the use of retractable bollards.
- 3.14 It should be noted that both the Local Highway Authority and TfGM did not raise any concerns with the proposed access arrangements with the highway officer confirming that appropriate levels of visibility are provided and that the closure and reduction in use of the two existing accesses on Bridge Street are welcomed.

Accessibility by Non-Car Modes

3.15 A detailed appraisal of the accessibility of the site is presented in the Transport Assessment, with neither the Local Highway Authority or TfGM raising any concerns with the development in this regard. I do not therefore propose to repeat all of the analysis presented in the Transport Assessment, but do summarise the key points below:-

- The site is within acceptable walking distance (less than 2km) of Ramsbottom town centre, where a good range of facilities can be reached.
- The site is within acceptable cycle distance of locations such as Ramsbottom and Edenfield etc. where a number of facilities and employment uses can be reached. In addition, National Cycle Route 6 runs almost adjacent to the site and locally links Accrington, to the north, with Bury to the south, and also connects to Regional Route 91.
- The closest bus stop to the site is located immediately adjacent the north-west corner of the site, on Bridge Street. There are also bus stops located on both sides of the A676 Bolton Street, approximately 400m walk distance west of the site. A summary of the main bus services which use these stops are provided in **Table 3.2** below.

Table 3.2 – Bus Services:

Service	Route	Service Frequency
472	Bury / Ramsbottom Circular	Mon – Fri: 15mins
		Sat: 15mins
		Sun: 30
474	Bury / Ramsbottom Circular	Mon – Fri: 15mins
		Sat: 15mins
		Sun: 30
477	Bury - Ramsbottom	Mon – Fri: 60mins
		Sat: 60mins
		Sun: -
X41	Accrington - Manchester	Mon – Fri: 30mins
		Sat: 30mins
		Sun: 60

- In terms of rail services, the Ramsbottom ELR Station is located immediately adjacent the site. The ELR is a recreational tourist attraction line that provides an hourly steam train service between Rawtenstall and Bury.

- 3.16 In summary the site has a good level of accessibility for those without the use of a car or as an alternative to using the car for local trips. A Framework Travel Plan was also submitted with the planning application which identifies a number of measures to promote sustainable travel to and from the site. The Framework TP will be developed into a detailed Travel Plan once the development is occupied.

4.0 TRIP GENERATION AND HIGHWAY IMPACT

Overview

- 4.1 This section of the Appeal Statement provides an estimate of the trip generating potential of the existing and proposed uses of the site, along with a summary of the impact of the development on the operational performance of the proposed site access and A56 Manchester Road / Bury New Road Signalised Junction.
- 4.2 It should be noted that the scale of development proposed (72 dwellings) falls below the widely accepted thresholds (less than 80 dwellings – DfT’s now archived Guidance on Transport Assessment) for when a full Transport Assessment is typically required. The reason being that developments of this scale have limited transport impacts and, therefore, detailed capacity assessments at off-site junctions are not normally required. Notwithstanding this, in response to TfGM’s comments on an earlier application on the site, detailed capacity assessments were presented in the Transport Assessment in order to quantify the impact of the development on the Bury New Road / Manchester Road junction.
- 4.3 The traffic flow analysis (survey data, trip generation estimates, distribution, growth factors etc.) and capacity assessment methodology presented in the Transport Assessment was not disputed by the Local Highway Authority or TfGM.

Trip Generation – Existing Use

- 4.4 As detailed earlier, the site formally accommodated the Holcombe Paper Mill which was substantially demolished in 2013, however, there are three existing buildings on the site, with a total GFA of approximately 350m², which could be brought back into use without the need for planning permission.
- 4.5 In order to estimate the level of trips that could be generated by the existing buildings on the site, if brought back into use, average trip rates from the industry-standard TRICS Database (V7.6.2) were obtained. A summary of the vehicular trip rates and generation associated with the existing use of the site, as presented in the Transport Assessment, is provided in **Table 4.1** below.

Table 4.1 - Estimated Trip Rates (Per 100m ²) Associated with the Existing Buildings				
Mode	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
Trip Rates	1.265	0.224	0.097	1.022
Trip Generation	4	1	0	4

Trip Generation - Proposed Development

- 4.6 Similarly, in order to estimate the trip generating potential of the proposed residential development, average trip rates from the industry-standard TRICS Database (V7.6.2) were obtained. A summary of the vehicular trip rates and generation associated with the proposed development, as presented in the Transport Assessment, is provided in **Table 4.2** below.

Table 4.2 - Estimated Trip Rates Associated with the Proposed Residential Development				
Mode	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
Trip Rates	0.136	0.370	0.348	0.187
Trip Generation	10	27	25	13

Net Trip Distribution

- 4.7 The net traffic generation is equal to the total traffic generated via the proposed development minus the total traffic that could be generated by the existing buildings, if brought back into use, and is as summarised in **Table 4.3** below.

Table 4.3 – Net Trip Generation				
Mode	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Arrivals	Departures	Arrivals	Departures
Vehicles	6	26	25	9

- 4.8 The above table demonstrates that the proposed development will result in an increase of approximately 32 two-way trips in the AM peak hour and 34 two-way trips in the PM peak hour. On average, this equates to a volumetric impact of around one additional vehicle every two minutes. Once this has been distributed on the wider highway network, this will not have a material impact on the operation of the local highway network.

Trip Distribution Methodology

- 4.9 The methodology used to estimate the trip distribution of the development-related traffic routing through the junctions in the Transport Assessment study area was based on information from the 2011 Census and again, was not distributed by the Local Highway Authority or TfGM.

4.10 The trip distribution routes and percentages are shown in **Table 4.4** below.

Table 4.4 – Trip Distribution		
Route Reference	Route Description	Percentage
A	Peel Brow, A56 Whalley Road North	19.4%
B	Bridge Street, Railway Street, Kay Brow, A676 South	12.8%
C	Peel Brow, Bury New Road, A56 Manchester Road South	67.8%

4.11 The proposed development trip generation has been assigned to the above distribution routes / percentages, with the development trips on the local highway network shown on the traffic flow figures presented in **Appendix PT3**.

Anticipated Highway Impact

4.12 When considering the impact of a development on the local highway network, a number of Local Authorities, including TfGM, typically ask for detailed capacity assessments to be undertaken when the increase in development traffic exceeds a 30 vehicle two-way trip threshold. This is based on guidance presented in the DfT's now archived Guidance on Transport Assessment document which, at paragraph 2.11, states the following:-

'The thresholds in Appendix B are based upon scenarios which would typically generate 30 two-way peak hour vehicle trips. Whilst there is no suggestion that 30 two-way peak hour vehicle trips would, in themselves, cause a detrimental impact, it is a useful point of reference from which to commence discussions'.

4.13 As shown on the traffic flow figures presented in **Appendix PT3**, once the development traffic has been distributed on the local highway network, all junctions in the TA study area including the Bury New Road / Manchester Road junction, experience an increase of less than 30 two-way development trips. Based on the trip numbers alone and the DfT's / widely accepted thresholds, the development will not have a material impact on the operation of any of the key junctions in the vicinity of the site and detailed capacity assessments should not have been necessary.

4.14 Notwithstanding this, in response to TfGM's comments on a previous application on this site, detailed capacity assessments were undertaken in the Transport Assessment in order to demonstrate that the site access will operate satisfactorily when serving the proposed development and to quantify the impact of the development on the Bury New Road / Manchester Road junction.

- 4.15 The assessment of site access junction has been undertaken using Junctions 9 (PICADY) software and the assessment of the signal controlled A56 Manchester Road / Bury New Road junction has been undertaken using LINSIG software.
- 4.16 With the Junctions 9 model, the results generated provide a Ratio to Flow capacity (RFC) along with an estimate of the likely traffic queues. RFC values between 0.00 and 0.85 are generally accepted as representing stable and acceptable operating conditions. Values between 0.85 and 1 represents variable operation (i.e. possible queues building up at the junction during the period under consideration and increases in vehicular delay moving through the junction). RFC values in excess of 1 represents overloaded conditions (i.e. congested conditions).
- 4.17 LINSIG software presents results as a percentage Degree of Saturation (DoS) and corresponding likely traffic queues for each modelled link at the junction. For Traffic Signals it is generally accepted that DoS of 90% or less on individual links represents satisfactory signal operation. DoS of between 90% and 100% represent variable operation which warrants further investigation and values in excess of 100% represent overloaded conditions.

Proposed Site Access Capacity Assessment

- 4.18 The PICADY assessment outputs are presented in **Appendix PT4** with the results summarised in **Table 4.5** below.

Table 4.5 – Proposed Site Access PICADY Results

Approach	AM PEAK		PM PEAK	
	RFC	MMQ	RFC	MMQ
2025 'With Development' Assessment Scenario				
Site Access- Right Left	0.10	0.1	0.06	0.1
Bridge Street – Ahead Right	0.00	0.0	0.01	0.0

- 4.19 The above results demonstrate that the proposed site access will operate well within practical capacity in the future assessment year of 2025, with RFC's well below the 0.85 threshold and no significant queuing or delay predicted, particularly on Bridge Street. It should be noted that the Local Highway Authority and TfGM did not raise any concerns with the assessment methodology or capacity of the proposed site access junction.

A56 Manchester Road / Bury New Road Junction – Capacity Assessment

- 4.20 The LINSIG assessment outputs are presented in **Appendix PT5** with the results of the 'with' and 'without' development scenarios summarised in **Table 4.6** below

Table 4.6 – A56 Manchester Road / Bury New Road Signal Controlled Junction LINSIG Results

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%	

- 4.21 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, with the junction still forecast to operate below the 100% with the development in place. 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.
- 4.22 Notwithstanding this, the Appellant has agreed to provide a Section 106 contribution of £110,000 which will allow the junction to be upgraded to MOVA control. The introduction of MOVA will improve the operation of the junction through the controller software constantly assessing, modifying and updating of the signal times afforded to each arm of the junction to ensure that it operates at peak efficiency. Research by Transport Research Laboratory (TRL) and the Department for Transport (DfT) supports this, with Traffic Advisory Leaflet 3/97 stating:
- ‘TRL/Department of Transport (DOT) trials have shown that MOVA reduces delays by an average of 13% compared to the earlier, vehicle actuated system. Benefits are likely to be largest when compared with vehicle actuated signal control that has not been recently validated.’*
- 4.23 JCT, the developers of LINSIG software, have confirmed that it is not possible to accurately model the benefits of introducing MOVA. The capacity assessment results presented above are therefore likely to be significantly improved upon by the introduction of MOVA and more than mitigate the very minor increase in development trips at this junction.

5.0 POLICY REVIEW AND ASSESSMENT OF THE REASON FOR REFUSAL

Planning Policy

5.1 The following planning policies from the Bury Unitary Development Plan (UDP) are cited within refusal reason one:-

▪ HT4 – New Development.

In considering the location of new or intensified development, the Council will encourage proposals which:

- *support the principles of sustainable development;*
- *assist the implementation of a balanced transportation strategy;*
- *minimise the environmental impact of traffic. In particular, new development will be encouraged where use can be made of public transport or spare capacity in the existing highway network, provided that this is also in accordance with other policies of the Plan.*

▪ H2/2 – Layout of New Residential Development.

New residential development will be required to demonstrate acceptable standards of layout. Factors to be considered when assessing proposals will include:

- *car parking provision;*
- *access for both vehicles and pedestrians, and provision for public transport;*
- *the possible need for traffic calming measures;*
- *density;*
- *space about and between dwellings;*
- *landscaping and screening;*
- *protection/provision of trees and hedgerows;*
- *open space/children's play areas;*
- *design for safety and security;*
- *access/facilities for the disabled;*
- *the existence of any public rights of way.*

5.2 The National Planning Policy Framework (NPPF) was initially published by the Ministry of Housing, Communities and Local Government in 2012 and was most recently revised on 20th July 2021. The NPPF is the Government's overarching framework policy which dictates the direction that each local authority should take when preparing their Local Plans.

- 5.3 Bury Council's UDP was adopted in August 1997, nearly 15 years before the initial 2012 NPPF was published and 24 years before the current version. One of the core principles of the NPPF is that significantly greater weight should be placed on bringing forward sustainable development, arguably much more so than was the case previously. The highly sustainable location of the site is not in dispute, as set out earlier.
- 5.4 The NPPF also introduced the 'severe' traffic impact policy test in para 111 (previously paragraph 32 in the first version), which was at the time a significant material step-change from the national and local policy approach that was applied previously. Paragraph 111 states the following:-
- Paragraph 111 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*
- 5.5 It is important to note the distinction that NPPF paragraph 111 draws between consideration of the acceptability of road safety matters (where an 'unacceptable' test applies) and traffic impact matters (where a 'severe' test applies).
- 5.6 Policies HT4 and H2/2 have no comparable text that reflect the 'severe' traffic impact test in Paragraph 111 of the Framework. Policy HT4 includes mention of developments being encouraged where use can be made of public transport or spare capacity in the existing highway network with H2/2 making reference to acceptable access needing to be provided for both vehicles and pedestrians, and provision for public transport.
- 5.7 Given that the policies in the UDP pre-date that of the NPPF, the key test that should apply from both a traffic impact and highway safety perspective is that in Paragraph 111 of the NPPF. It should be noted however that the highway related reason for refusal 1 does not allege any specific conflict with policies in the NPPF.

Assessment of Reason for Refusal One

- 5.8 Refusal reason 1 raises concerns that the proposed development will result in an intensification of the use of the site which, it is alleged, would be detrimental to road safety and the free flow of traffic. I address the matters of road safety and highway impact below.

Highway Safety

- 5.9 The Personal Injury Accident data for the local highway network has been assessed which has not highlighted any existing road safety problems. No accidents have occurred in the immediate vicinity of the site, on either Bridge Street or Peel Brow, over the 5-year study period. In addition, of the junctions assessed all experience relatively low accident rates, an average of well below one accident per year, with the majority of these accidents being of slight severity.
- 5.10 By any measure this road safety record is enviable and compares very favourably with other parts of the road network in Bury and elsewhere. There are no compelling empirical or technical reasons to believe that the local highway network will operate any less safely with the additional development-related traffic in place.
- 5.11 Vehicular access to the development will be provided off Bridge Street via the existing access to the north-west of the site, which will be upgraded to typical residential standards. The remaining two existing accesses, located to the north-east of the site and centrally, will be closed and the footway reinstated. This will reduce the number of accesses on this section of Bridge Street, providing a betterment to road safety.
- 5.12 The proposed site access has been designed to relevant geometrical standards and provides the required levels of visibility. In addition, an independent Stage One RSA was undertaken of the proposed site access which did not identify any significant highway safety issues. Measures to improve road safety, including the provision of keep clear markings and dropped kerb / tactile paving as requested by the RSA have been provided.
- 5.13 Given the lack of an existing highway safety issue on the local highway network and as the proposed access arrangements comply with relevant geometrical and visibility splay standards, with no issues being identified in the RSA, it is unclear why the Council should view this development as being detrimental to road safety. It is my firm opinion that the impact of the development on highway safety cannot be seen as being unacceptable, in accordance with the key test in Paragraph 111 of the NPPF.
- 5.14 It should also be noted that no highway safety concerns were raised by the Local Highway Authority or TfGM.

Highway Impact

- 5.15 The analysis presented in the Transport Assessment and supplemented in this Appeal Statement demonstrates that once the development traffic has been distributed on the local highway network, all junctions in the TA study area including the Bury New Road / Manchester Road junction, will experience an increase of less than 30 two-way development trips. Based on these low trip numbers and the DfT's / widely accepted thresholds, the development will not have a material impact on the operation of any of any of the key junctions in the vicinity of the site and detailed capacity assessments should not have been necessary.
- 5.16 Notwithstanding this, in response to TfGM's comments on a previous application on this site, detailed capacity assessments were undertaken of the proposed site access and Bury New Road / Manchester Road junction.
- 5.17 The assessments demonstrate that the proposed site access will operate well within practical capacity when serving the proposed development, with no significant queuing or delay predicted, particularly on Bridge Street. It should be noted that the Local Highway Authority and TfGM did not raise any concerns with the assessment methodology or capacity of the proposed site access junction.
- 5.18 Assessments of the Bury New Road / Manchester Road junction demonstrate that this junction is operating slightly over the 90% capacity threshold during the PM peak hour, without the proposed development in place. However, it has been demonstrated that the junction will still operate below the 100% threshold and that the development will not result in a material increase in delay or 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.
- 5.19 Notwithstanding this, the Appellant has agreed to provide a Section 106 contribution of £110,000 which will allow the junction to be upgraded to MOVA control. The introduction of MOVA will improve the operation of the junction through the controller software constantly assessing, modifying and updating of the signal times afforded to each arm of the junction to ensure that it operates at peak efficiency. The introduction of MOVA at this junction will more than mitigate the very minor increase in development trips at this junction
- 5.20 The residual cumulative impact of the development on the road network cannot be considered severe in accordance with the key test in Paragraph 111 of the NPPF.

- 5.21 Again, this application was recommended for approval with no objections on highways from the Local Highway Authority or TfGM. Whilst it is accepted that committee members do not have to follow the advice of their senior professional officers, should they deviate from officer's recommendations they should have substantive planning reasons and technical evidence to support their decision. It has been demonstrated through this Appeal Statement that this clearly was not the case with this application on either highway safety or traffic impact grounds.
- 5.22 For the reasons set out above, it is respectfully requested that the Appeal be allowed.