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By email

Our ref BRO004/0001/4128-6430-9837/2/SR
24 November 2023

Dear Mr Hope

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Cuerden Strategic Site, East of Stanifield Lane, North of Clayton Farm, West of Wigan Road, Lostock Hall -
Planning Application LCC/2022/0044**

Thank you for your letter dated 26 October 2023.

You will be aware that we act for the Brookhouse Group Limited. Brookhouse's transportation consultants Mode have reviewed the further environmental information and continue to have significant concerns as to the adequacy of the assessment work undertaken.

We attach Mode's technical note dated 23 November 2023. In summary:

The application to LCC will create a ransom situation over the Brookhouse land and potentially impact the comprehensive delivery of the wider strategic site and of the link road, delivery of which would reduce traffic volumes on the A582.

The majority of the site is not within reasonable walking distances to bus stops on Stanifield Lane and without the link road there is no option to divert existing services from Stanifield Lane into the site. With poor access to the bus network this cannot be considered to be a sustainable development.

The proposed pedestrian footway on Stoney Lane will reduce the carriageway to less than 2m in some places, thereby removing vehicular access to Stoney Lane, the approved residential development for 9 no. dwellings (app no. 07/2022/00886/OUT) and to Brookhouse land.

The applicant has sought to demonstrate that the application will generate less trips than the previously approved application by changing trip rates. If the previously approved trip rates were used this would show that the application generates more AM peak hour trips.

The junction modelling assessment fails to assess a reasonable base situation in order to enable comparison with the 'with development' scenario to understand the impact of the development on the network. This point has also been raised by National Highways.

Mr Robert Hope
Lancashire County Council

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There were a number of issues with both the LinSig and VISSIM modelling assessments which were raised by National Highways, some of which have been updated; however, the results are not available on the planning portal to review.

The VISSIM modelling assessment was deemed to be so poor that National Highways sought to undertake their own assessment in order to understand the impact on their network.

The LinSig modelling results demonstrate that some junctions are still anticipated to operate over capacity in the network peak hours, meaning the full impacts of the scheme have not been mitigated. Whereas, with link road, these mitigation schemes would be more effective at improving the operational capacity on the road network.

Yours faithfully

A handwritten signature in grey ink that reads "Town Legal LLP". The signature is written in a cursive, slightly slanted style.

Town Legal LLP