Consultation Response from KC, Highways Development Management		
2020/92546 Land off, Blackmoorfoot Road and Felks Street, Crosland Moor, Huddersfield, HD4 7AD		
Outline application (with details of points of access only) for the development of up to 770 residential dwellings (Use Class C3), including up to 70 care apartments (Use Classes C2/C3) with doctors surgery of up to 350 sq m (Use Class D1); up to 500 sq m of Use Class A1/A2/A3/A4/A5/D1 floorspace (dual use), vehicular and pedestrian access points off Blackmoorfoot Road and Felks Stile Road and associated works.		
Date Responded: 16/04/2021	**Responding Officer: Ryan Kinder**	**Responding Ref: K2-16/11**

Highway Development Management's (HDM) comments for the above application as follows:

Updated final comments 16/04/2021

Outline planning application for the erection of residential development of up to 770 dwellings with access the only mater to be considered, all other matters are to be reserved.

Further to previous comments as detailed below, discussions between the applicants Transport Consultant (Croft) and the Councils UTC section have taken place. This has led to a further Technical note (04) been submitted dated March 2021. The technical note has addressed concerns raised by the Councils UTC section on the previous methodology on the modelling of signalised junctions on the existing network as a result of the assignment and distribution of traffic from the proposed development.

The signalised junctions modelling results are summarised as follows:

Blackmoorfoot Road/Park Road West

It is acknowledged that this junction is going face some capacity issues as a result of this development which may lead to excessive queuing, however a recent scheme to improve this junction further has been carried out to improve the efficiency of the signal timings and provide updated equipment including Bluetooth monitoring equipment. This was funded by the recent development at the Former St Lukes hospital. It is considered that no further improvements can be provided at this junction unless more space is provided which would include demolition of building and shops.

It should also be noted that the vehicular trip rate calculated for this development in the assignment and distribution of traffic was a very robust figure and considered to be a 'worst case scenario'. In reality this junction may or may not have a severe impact.

Blackmoorfoot Road/Manchester Road

The modelling of this junction indicates that in the design year 2022, the junction operates within capacity with the development flows, however in the design year 2031 it appears capacity issues may or may not arise, it again must be stressed that the vehicular trip rate is considered robust, in this instance it is suggesting that more vehicles will travel down Blackmoorfoot Road than on Manchester Road, however this in reality will not be the case. In addition the forecast growth rates may be subject to a reduction given the current trends and situation we are in as a nation.

Lockwood Bar junction.

This junction is currently running over capacity, it is considered that the assignment and distribution of traffic from this development will have a negligible effect on its operation. It is also worth noting that a major highways scheme is planned here by the Council to address the current capacity issues.

The information on the junction modelling has now been clarified and is now considered acceptable from a highways perspective.

The previous HDM comments requested further information to address the following matters:

- Contained within the Transport Assessment is a plan which identifies a potential site access of Blackmoorfoot Road (dwg ref 1852-F01). The proposed site access should be of a minimum road width of 6.75m plus cycle lanes to both sides and 2m footways.

- Swept paths for an 11.6m long PSV and 11.85m refuse collection vehicle should be demonstrated on a suitable plan.

- Footways to the site frontage should be of a minimum 2m in width.

- The junction of Felks Stile Road/Blackmoorfoot Road, currently has poor visibility and a tight radius onto Blackmoorfoot Road, to improve this a junction improvement scheme is considered necessary as part of the proposed site frontage improvements.

- The existing 30 mph speed limit will need relocating to beyond the site access on Blackmoorfoot Road to facilitate suitable sightlines for the development, this will need to be secured via suitable condition accordingly.

An addition Technical Note (3) has been submitted dated January 2021, this addresses these matters and information on the proposals are attached in the appendices. A frame work Travel Plan is also included in this Technical Note.

The total traffic generation associated with the proposed development of 770 dwellings is to forecast circa 558 two –way vehicle movements in the AM peak and 602 two-way vehicle movements in PM peak

A previous calculation based on 825 residential units for the residual traffic impact the development would have at the Longroyd Bridge junction has been revised to accommodate upt 770 dwellings. This figure has been revised and an offsite contribution is calculated at £552,980.00.

Previous comments were raised regarding the current public transport provision to serve this development, discussions have taken place and an agreement has been reached that a sustainable travel measures and improvements to the bus facilities are requested as follows:

Provision of 2 bus shelters with ‘Real-time’ information displays (for either new stops within the site or upgrading other local stops) (£23k per stop)

The provision of 2 bus stop poles (for alighting) within the site. (£500 per stop) should this come forward at a future stage of development

A sustainable travel fund to the value of £393k for the number of units currently indicated.

Travel Plan monitoring

Kirklees Council requires developers to contribute to the cost of monitoring Travel Plan progress. The Council charges an annual fee for five years for this service, with two rates based on the size of the development.

- Large Scale Major Development defined as 200 or more residential units or 10,000 m2 GFA or more for other types of development:

Cost: £3000 per annum for the first five years after opening

- Small Scale Major Development defined as between 50-199 residential units or at or above the thresholds defined in the table at Appendix A up to 9,999 m2 GFA for other types of development

Cost: £2000 per annum for the first five years after opening

It should be noted that, as per the criteria set out above, the Blackmoorfoot Road proposal would require £3,000 per annum for the first five years from the development being brought into use.

This fee will cover assistance with the development of the Framework Travel Plan into a Full Travel Plan in discharging the Travel Plan condition directly with Emmpire Knight Group Thereafter, the fee which equates into approximately £50/hr x 60hrs = £3,000 for the officer time, will be used to assist the Travel Plan Co-Ordinator in implementing, maintaining, and monitoring the Full Travel Plan at total cost of £15,000 over 5 years.

Overall the proposal is considered acceptable from a highways perspective, please include the following conditions:

OFF-SITE HIGHWAY IMPROVEMENTS

Prior to development commencing, a detailed scheme for the improvement of Blackmoorfoot Road shall be submitted to and approved in writing by the LPA. The scheme shall include full sections, details of speed reducing features, construction specifications, drainage works, street lighting, relocation of existing 30mph speed limit, white lining, signing, surface finishes and treatment of junction/forward sight lines together with an independent Safety Audit covering all aspects of the work. Unless otherwise agreed in writing by the LPA, all of the agreed works shall be implemented before any part of the development is first brought into use.

Visibility Splays to be provided

Before development commences, the wall to the site frontage shall be set back to the rear of the proposed visibility splays as shown on an approved plan and shall be cleared of all obstructions to visibility and tarmac surfaced to current standards in accordance with details that have previously been approved in writing by the Local Planning Authority.

Reason: To ensure adequate visibility in the interests of highway safety.

FOOTNOTE

The granting of planning permission does not authorise the carrying out of works within the highway, for which the written permission of the Council as Highway Authority is required. You are required to consult the Design Engineer, Flint Street, Fartown, Huddersfield (Kirklees Street Care: 0800 7318765) with regard to obtaining this permission and approval of the construction specification. Please also note that the construction of vehicle crossings within the highway is deemed to be major works for the purposes of the New Roads and Street Works Act 1991 (Section 84 and 85). Interference with the highway without such permission is an offence which could lead to prosecution.

Details of junction of new estate road

No development shall take place until details of the junction and associated highway works, between the proposed estate road(s) and Blackmoorfoot Road/Felks Stile Road have been approved in writing by the Local Planning Authority. No building shall be brought into use until the works to provide the junction have been completed in accordance with the approved details.

Reason: To ensure that suitable access is available for the development.

HWNOTE3 The details shall include full sections, details of speed reducing features, construction specifications, widening of existing highway to site frontage, drainage works, lighting, signage, white lining, surface finishes, treatment of sight lines together with an independent safety audit covering all aspects of the works.

Travel Plan to be submitted:

A full travel plan shall be submitted to and approved in writing by the LPA
3 months prior to any part of the development being brought into use. The travel plan shall include measures to improve and encourage the use of sustainable transport, the Travel Plan shall continue to be developed and implemented as long as any part of the development is occupied.

Reason: To comply with the Council's sustainability objectives.

Internal adoptable roads

No development shall take place until a scheme detailing the proposed internal adoptable estate roads have been submitted to and approved in writing by the Local Planning Authority. The scheme shall include full sections, drainage works, street lighting, signing, surface finishes and the treatment of sight lines, together with an independent safety audit covering all aspects of work. Before any building is brought into use the scheme shall be completed in accordance with the scheme shown on approved plans and retained thereafter.

Reason: To ensure that suitable access is available for the development.

Upgrading Bus Stops

Prior to development commencing, a detailed scheme for the improvement of bus stops 9 (to be agreed) shall be submitted to and approved in writing by the LPA. Unless otherwise agreed in writing by the LPA, all of the agreed works shall be implemented before any part of the development is first brought into use.

Reason: To improve public transport infrastructure in the vicinity of the site in accordance with the council sustainability objectives.

Method for collection and storage of waste

Before development commences, details of suitable storage, bin presentation points and access for collection of wastes from the dwellings hereby approved shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter.

Before development commences, details of temporary waste collection arrangements to serve

occupants of completed dwellings whilst the remaining site is under construction shall be submitted to and approved by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter.

Closure of redundant accesses.

Prior to the first occupation of the development details of the proposed method of closing off and making good all existing redundant accesses to the development site have been submitted to and approved in writing by the local planning authority. The approved works shall be completed before the development is occupied and the highway layout retained as such for the lifetime of the development.

Reason: To ensure the free and safe use of the highway.

Highway condition survey

Development shall not commence until a survey of the condition of the following streets Blackmooorfoot Road, Felks Stile Road has been submitted to and approved in writing by the Local Planning Authority. Upon completion of the development (completion of the final approved building on the site) a further condition survey shall be carried out and submitted to the Local Planning Authority together with a schedule of remedial works to rectify damage to the highway identified between the two surveys . The approved mitigation works shall be fully implemented prior to final occupation of the development. In the event that a defect is identified during other routine inspections of the highway that is considered to be a danger to the public it must be immediately made safe and repaired within 24hours from the applicant being notified by the Local planning Authority.

Traffic associated with the carrying out of the development may have a deleterious effect on the condition of the highway that could compromise the free and safe use of the highway.

Structures

1) Before the development commences a scheme detailing the location and cross sectional information together with the proposed design and construction for all new retaining walls/ building retaining walls adjacent to the existing/proposed highways shall be submitted to and approved by the Highway Authority in writing. The approved scheme shall be implemented prior to the commencement of the proposed development and thereafter retained during the life of the development.

2) Before the development commences a scheme detailing the location and cross sectional information together with the proposed design and construction details for all new surface water attenuation tanks/pipes/manholes located within the proposed highway footprint shall be submitted to and approved by the Highway Authority in writing. The approved scheme shall be implemented prior to the commencement of the proposed development and thereafter retained during the life of the development. See https://www.kirklees.gov.uk/beta/regeneration-and-development/highways-guidance-and-standards.aspx for further details.

Important Notes:
All new storm water attenuation tanks/pipes/culverts/manholes with internal diameter/ spans exceeding 0.9m must be located off the adoptable highway. Any decision to locate these facilities within the adoptable highway footprint must be accompanied with a full risk evaluation report with particular reference to their proposed inspection, structural assessment and maintenance regime in compliance with the CDM Regulations 2015 requirements.
The adopting authority (i.e. Yorkshire Water) will also be required to produce and submit a legally binding agreement to the Highway Authority explicitly stating that they will be fulfilling their obligations

in relation to the systematic and cyclical inspection and structural assessment of any attenuation structure located within the highway footprint, in full compliance with BD63- Inspection of Highway structures.

Furthermore, all new precast pipes/ culverts/storage tanks proposed for use within the footprint of an adoptable highway must comply with the Specification for Highway Works (SHW-Series 500 or 2500) and/or must be accredited with a BBA (The British Board of Agrément Roads and Bridges) or HAPAS (Highway Authority Product Approval Scheme) or equivalent certificate.

Previous comments 02/12/2020

A Transport Assessment/Travel Plan narrative has been submitted dated July 2020 by Croft Transport Solutions.

The submitted Transport Assessment (TA) assesses the traffic impact of a development of some circa 700 dwellings in trip generation terms. Highways Development Management considers the tip rates utilised to be acceptable in this respect.

The total traffic generation associated with the proposed development is to forecast circa 733 two – way vehicle movements in the AM peak and 602 two-way vehicle movements in PM peak.

The signalised junction of Blackmoorfoot Road/Park Road West has been modelled and referred to in pages 40-44 of TA, the Councils UTC section have concerns regarding the methodology of this data and further discussion is requested regarding this issue.

To enable and informed assessment from a highways prospective further information is required in the respect of the following matters:

Contained within the Transport Assessment is a plan which identifies a potential site access of Blackmoorfoot Road (dwg ref 1852-F01). The proposed site access should be of a minimum road width of 6.75m plus cycle lanes to both sides and 2m footways.

Swept paths for an 11.6m long PSV and 11.85m refuse collection vehicle should be demonstrated on a suitable plan.

Footways to the site frontage should be of a minimum 2m in width.

The junction of Felks Stile Road/Blackmoorfoot Road, currently has poor visibility and a tight radius onto Blackmoorfoot Road, to improve this a junction improvement scheme is considered necessary as part of the proposed site frontage improvements.

The existing 30 mph speed limit will need relocating to beyond the site access on Blackmoorfoot Road to facilitate suitable sightlines for the development, this will need to be secured via suitable condition accordingly.

The Transport Assessment (TA) provides a detailed summary of the existing public transport conditions at the site. With respect to sustainable transport provision, as in previous applications, the TA concludes that ‘the proposed development site is ‘accessible by bus’. The 393 service past the site currently provides an hourly service. We have concerns that the bus service level passing this site (1 bus per hour until 1700) is unlikely to encourage significant levels of modal shift from car to bus.

It is noted that the applicant has suggested that 'discussions will be held with the highway authority and West Yorkshire Metro at a more advanced stage of the
planning process regarding potential improvements to the existing bus service in the vicinity of the application'. For the avoidance of doubt, we suggest that any enhancements need to be discussed an agreed as part of this outline application and set out in a S106 agreement and not deferred until a reserved matters application. We do not agree with the TA conclusion that the public transport provision for a site of this scale should be considered acceptable with a single hourly service.

The 393 service is a tendered service and paid for by the Combined Authority in full. The continuation of all tendered services is subject to the availability of funding and would be assessed against our tendered services criteria. The accessibility of this site by non-car modes is therefore heavily dependent on the ability of the Combined Authority to fund this service. We consider that (as a minimum), to ensure the continuation of the existing bus service levels past the site (1 bus per hour) and to increase the hours of operation of the service into the evening, it would be reasonable to seek a financial contribution from the development towards the operation of the 393 service (or equivalent service).

The 393 service is currently part of a package of service that cost in the region of £800k per annum to operate. This aspect of the package cost around £65k per annum to operate. If further funding could be secure through this application, then we would be able to fund enhancements to this service.

There are also additional opportunities to improve the access to the site by pump priming the existing commercial bus network to extend to the site. The extension of the 328 or 387 services is a possibility. This would be dependent on the layout of the site incorporating a turning area or road layout to allow for the circulation of buses.

The Travel Plan (TP) states that 'suitable targets for reducing the need to travel by private car will be set and agreed with Kirklees Council and included in the final Travel Plan for the development'. A more robust approach would be for targets to be set as part of this application to allow potential mitigation options to be considered and secured through the planning process. The current TP uses vague language which offers no guarantee that the measures discussed will be implemented. The measures suggested in 5.2.2 of the TP appear to be light touch and are unlikely to deliver any meaning full changes to travel patterns.

To ensure that sustainable transport can be a realistic alternative to the car, the developer needs to fund a package of sustainable travel measures. We recommend that the developer contributes towards sustainable travel incentives to encourage the use of sustainable modes of transport. Leeds City Council have recently introduced a sustainable travel fund. The fund can be used to purchase a range of sustainable travel measures including discounted Mcard (Residential Mcard Scheme) for all or part of the site. This model could be used at this site.

The payment schedule, mechanism and administration of the fund would have to be agreed with Kirklees Council and the Combined Authority and detailed in a planning condition or S106 agreement. As a starting point and an indication of the cost should the normal MCard scheme be applied based on a bus only ticket, the contribution appropriate for this development would be £393k. This equates to 770 bus only Residential MCards.

In summary we suggest that the developer should fund the following:
- £150k per annum for a minimum of 5 years to be used for enhancing the 393 and pump priming either or both the 328 and 387 services.
- An amended site layout to incorporate a bus turning area or road layout that allows buses to circulate to facilitate bus services into the site.

- Provide a minimum of 2 bus shelters with Realtime information displays (for either new stops within the site or upgrading other local stops) (£23k per stop)
- Provide 2 bus stop poles (for alighting) withing the site. (£500 per stop)
- Travel Plan Fund to the value of £393k (Based on Residential MCard Costs)

Travel Plan monitoring

Kirklees Council requires developers to contribute to the cost of monitoring Travel Plan progress. The Council charges an annual fee for five years for this service, with two rates based on the size of the development.

• Large Scale Major Development defined as 200 or more residential units or 10,000 m2 GFA or more for other types of development:
Cost: £3000 per annum for the first five years after opening

• Small Scale Major Development defined as between 50-199 residential units or at or above the thresholds defined in the table at Appendix A up to 9,999 m2 GFA for other types of development
Cost: £2000 per annum for the first five years after opening

It should be noted that, as per the criteria set out above, the Blackmoorfoot Road proposal would require £3,000 per annum for the first five years from the development being brought into use.

This fee will cover assistance with the development of the Framework Travel Plan into a Full Travel Plan in discharging the Travel Plan condition directly with Emmpire Knight Group Thereafter, the fee which equates into approximately £50/hr x 60hrs = £3,000 for the officer time, will be used to assist the Travel Plan Co-Ordinator in implementing, maintaining, and monitoring the Full Travel Plan at total cost of £15,000 over 5 years.

An independent stage 1 safety audit and designers response is required on the site access and improvement works on the existing highway.

With respect to this application Kirklees Council Transportation and UTC sections have undertaken to:
1. quantify and assess the impact of the traffic generated from this development from the local highway authority's perspective at the Longroyd Bridge (A62 Manchester Road/B6432 St Thomas' Road/Longroyd Lane) and Lockwood Bar (A616 Huddersfield Road/B6108 Meltham Road/Swan Lane) Junctions; and

2. determine what level of contribution to schemes already in development might be appropriate based on a proportional impact analysis

1 Quantification and assessment of the impact:
The Council already has two calibrated and validated Transyt models for a base year of 2015 at these two junctions. These have been developed as part of the work being undertaken as part of the Huddersfield Southern Gateways West Yorkshire plus Transport Fund scheme .
The Huddersfield Southern Gateways scheme is a collection of junction improvements identified from work undertaken to understand the cumulative traffic impact of the Kirklees Local Plan on the authority's local highway network . This work identified a list of 30 junctions that would require mitigation to accommodate full Local Plan build-out by 2030.
To understand the impact of development from the Black Cat the Black Cat on both Longroyd Bridge and Lockwood Bar, the following methodology has been adopted:
1. Calculate the performance index (from Transyt) of the base models for both junctions. The performance index is a linear combination of vehicle delay and number of vehicle stops expressed as a monetary value. The lower the PI the better the junction is performing.

2. Growth the base flows to a forecast year when the development will be "built out". In this case

2032/32. This is based on expected Local Plan build-out rates. The forecast growth rate is derived from Tempro v7.1. (This includes all development). In this case a forecast growth of 12% has been used. This is the average growth of the three zones around each junction for "car driver" as it is assumed that the figures provided by the consultant for assignment already take mode split into account.

3. Run the Transyt models with the identified West Yorkshire Transport Fund scheme and the full growthed traffic flows. Calculate a PI for each junction

4. Use the developer's (and agreed with the Council) generation, mode split distribution and assignment figures for the development of 825 residential units and subtract these from the 2032 growthed traffic flows. Rerun the West Yorkshire Transport Fund scheme Transyt models with the growthed traffic flows, but with the development flows subtracted. Calculate a PI for each junction

5. The % difference between the two PI's in steps 3 and 4 is the percentage contribution models.

6. This percentage change is then applied to the costs associated with each preferred scheme at each specific junction. In this case the costs are as follows:
Lockwood Bar- £
Longroyd Bridge- £750,000
NB
As this process has developed it is noted that the modelled flows from the development at Lockwood Bar are minimal and so the calculation for this junction has been discontinued and the focus has been solely on the Longroyd Bridge junction.

2. Determination of Contribution

The results for Longroyd Bridge are as follows:

	PI (£/hr)	% change
2015	1395.16	
2032 All Growth	2502.91	79%

	PI (£/hr)	% change
2015	1395.16	
2032 All Growth- development traffic	2502.91	-31%

These results are somewhat surprising. It would be expected that the percentage change in the "2032 All Growth- development traffic" would be perhaps slightly less than the "2032 All Growth" figure. This would signify that the development traffic is a small percentage of the full amount of growth.
In this instance it is not. One hypothesis is that the modelled development traffic at this junction is greater than the Department for Transport's overall growth estimates.
In this instance the only other option available to the Council given the timescales is to attribute the "all growth figure as a percentage of total scheme cost. The reality is that the scheme will increase traffic at the junction by a figure greater than 79%, but for the purposes of agreeing on a proportionate contribution, the Council should therefore request the sum of 79% of £750,000= £592,500

Offsite highway improvement contributions

A contribution of £592,500 is requested towards the Longroyd Bridge congestion scheme, the details of which are outlined above.

Other off site highway works.

The impact of the traffic associated with this development in conjunction with the recently approved development at Former St Lukes Hospital development is expected to cause issues for traffic exiting the site. It is therefore concluded that a section 278 improvement scheme in the form of the provision of traffic signals at the junction of Blackmoorfoot Road/Former St Lukes Site is provided at the expense of this application. A suitable trigger in terms of numbers of dwellings can be agreed accordingly and secured via suitable condition.