

Rev A	05/10 Additional Highway Comments added
Rev B	Updated Miller Comments 25.01.21

	KMC Comment	Miller Comment
Access		
1A	- o Junction modelling input files to be provided for review; - o Collision analysis to be provided for review; - o Clarification of on-site parking provision is required, with amendments required to address any shortfall in provision; - o Amendments to the site access and internal layout are required to address PROW, HDM and Highway Design comments. In particular, the treatment of the affected PROW through the site needs further consideration; - o Updated Swept Path Analysis (SPA) is required of the amended site layout, which must be undertaken in accordance with local guidance; - o Detailed plans are required to confirm how all highway adoption standards are being met, including visibility requirements, and must clearly demonstrate the proposed adoption extents; - o Stage 1 Road Safety Audits are required for the S278 and S38 works.	- o ATTP have provided the junction modelling within Rev A of the TA. - o ATTP have provided and reviewed the collision analysis within Rev A of the TA. - o Car parking has been provided in accordance with SPG. - o Existing PROW has been accommodated and an adjoining footpath link proposed to enhance it. - o ATTP have provided updated swept path analysis within Rev A of the TA. - o Layout has accounted for design standards and forward vis. S38 adoption will be confirmed as part of the subsequent S38 submission to the LHA. - o Stage 1/2 RSA completed for S278 by Optima. Following finalisation of the S38 designs Optima will be employed to review S38. Nonetheless this will be submitted as part of the formal S38 submission.
1	Relating to this new access layout, I am aware of previous HDM (Highways Safety Team) comments which include: “This stretch of the A6024 is subject to overtaking manoeuvres. The 2 proposed refuges therefore need to have high intensity reflective bollards so they can be seen from a distance. With regards to road markings, the double white line system through the bend to the south of the site will need extending up to the new junction, so northbound drivers aren’t tempted to overtake when exiting the bend. Similarly, double white lines and deflection arrows will need laying on the southbound approach to the junction, as detailed in TSM Ch 5. All stretches of double white lining will require reflective road studs. Temporary signs will also be required to diag 7014” Please ask that the applicant presents this, clearly annotated on an amended engineering drawing (1:200 scale), implementation of which would be secured accordingly.	o The S278 junction proposals have been updated by ATTP accordingly on 18001-P-003 Rev C.
2	The existing proposal is presented on submitted drawing ref: 18001/P/003. This would be subject to a future Section 278 (off-site highway works) application/agreement with the Council and would require the full (Stages 1-4) Road Safety Audit process to be applied, throughout development/implementation. Could you please request that the applicant forward me the supporting Stage One Road Safety Audit and submits that to HDM? I was unable to find such within our file archives. If the Stage One RSA is not recent (i.e. undertaken in support of this planning application) – then a new Stage One RSA must be completed and submitted prior to determination.	o Stage 1/2 RSA completed for S278 by Optima. Copy to be provided.
2A	An up to date Stage 1 Road Safety Audit is required of the above site access S278 works and the internal Section 38 layout, together with a Designers Response Report. These should be completed and submitted to HDM prior to determination. It is requested that the new bus shelters that are required along Woodhead Road (see further comments below) are shown on the site access drawing that will be subject to the Stage 1 RSA, to allow any implications associated with the bus shelters to be considered. As the internal site layout is not yet agreed (see further comments below) the applicant may wish to delay the Stage 1 RSA for the S38 works until the site layout has been developed further.	- o Stage 1/2 RSA completed for S278 by Optima. Copy to be provided. - o Following finalisation of the S38 designs Optima will be employed to review S38. Nonetheless this will be submitted as part of the formal S38 submission.
2B	To enable HDM to consider whether the above statements are correct, it is requested that the LINSIG and Junction 9 input model files are provided to HDM, so that the junction operation can be reviewed in detail. In particular, this includes the LINSIG files of the signalised junctions that are within the study area, which are understood to experience capacity issues during network peak periods. Subject to the findings of the above review, mitigation works may be necessary to address capacity issues on the local highway network.	o ATTP have provided the junction models within Rev A of the TA.
Collison Analysis		
3	I would, however, advise that an up-to-date collision analysis exercise is undertaken and submitted, using recent data.	o ATTP have provided and reviewed the collision analysis within Rev A of the TA.
3A	Therefore, it is requested that up to date collision analysis is undertaken and submitted to HDM for review. The analysis should include the following as a minimum: - o A6024 Woodhead Road/ Station Road/ Eastgate - Signal Controlled Junction; - o A616 New Mill Road/ Station Road - Priority Cross-roads; - o A6024 Woodhead Road/ A616 New Mill Road - Signal Controlled Junction; - o A6024 Woodhead Road from above junctions, past the site access, up to and including the Smithy Place Lane/Hagg Wood Road/A6024 junction. It is noted that the Smithy Place Lane/Hagg Wood Road/A6024 junction must be included in the collision analysis, as an initial review of this junction indicates that there have been a number of incidents that could be affected by development traffic, particularly traffic using Smithy Place Lane to travel to/via Brockholes. Subject to the findings of the above collision analysis, mitigation works may be necessary to address safety issues on the local highway network.	o ATTP have provided and reviewed the collision analysis within Rev A of the TA.
Refuse & Recycling		

4	Bin collection points should be presented on a drawing and located at the end of the private driveway areas, as Kirklees refuse vehicles will not access private driveways. Future residents will therefore need to wheel refuse bins to the area at the end of each private driveway where it connects to (future) adopted highway, an area of flat hardstanding therefore needs to be available for approx. 5 no. bins/area. Provision for the storage of waste to the rear/side of each property should be indicated, along with bin collection points at the end of all private driveways on communal collection points, not residents should not have to drag their bins to collection points exceeding 30m and refuse collection vehicles should not have to reverse more than 12m.	o Added to the site layout accordingly.
4A	All turning heads within the site should be of a size to accommodate the Kirklees Design Refuse Collection Vehicle (11.85m long), demonstrated via swept path analysis (SPA). It is noted that the swept path analysis currently provided in the Transport Assessment does not utilise the correct refuse vehicle size, and does not assess the latest site layout. It also appears that stationary steering has been used at the turning heads, which is not in accordance with KC guidance.	o ATTP have provided updated swept path analysis within Rev A of the TA.
Parking		
5	The UDP is not the correct/up-to-date document with respect to parking provision and the applicant is asked to clarify/correct this. Parking for the residential should accord with Kirklees Council (adopted SPD) Street Design Guidance. Visitor spaces at a rate of one per four dwellings are required which should be served from an informal road.	o ATTP have updated referencing to the SPG within Rev A of the TA.
6	I could not establish if they 4 no. bed homes all had an internal garage from the documentation submitted, however, it is clear that all units have a minimum of 2 no. car parking spaces. That said, the 4 no. bed units require 3 no. parking spaces/unit, therefore, please seek clarification from the applicant that this is the case.	o Car parking has been provided in accordance with SPG.
Sustainable Transport - Bus		
7	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 MetroCard's (Residential MetroCard 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 WYCA and detailed in a planning condition or S106 agreement. As an indication of the cost should the normal RMC scheme be applied based on a bus only ticket, the contribution appropriate for this development would be £74,679.00. This equates to bus only Residential MCards." Although Metro have only identified the requirement for 1 no. new shelter, HDM advises that bus shelter and real time information screens should be provided on both sides of Woodhead Road at the (2x) bus stops closest to the site (total contribution required is 2 x shelters at £13,000 per shelter and £10,000 per RTI screen for 2 x RTI screens. Forming a total of £46,000). To be secured under the Heads of Terms/s106, supporting any future planning consent for this proposal, in addition to the £74,679 for Residential MetroCard's. Total public transport s106 contribution is therefore: £120,679.	o Refer to the Travel Plan dated December 2021 Ref P1041P_20210518. o It is considered that a bus stop upgrade to the existing pole to the eastern (site) side of Woodhead Road is feasible. However, upgrading of the pole to the western opposite side is not due to the narrow constrained footway width and adjacent retaining wall.
Sustainable Transport - Pedestrian and Cycle		
7A	Initial comments have been provided that have identified concerns regarding the changes to the public footpath that runs through the site (HOL/31/40), which are as follows: - o There is a visitor parking bay location in the turning head opposite Plot 7 immediately adjacent to the existing PROW. The parking bay may affect the safety of users of the PROW and could result in the PROW becoming blocked if vehicles park badly. As such, it is requested that the visitor parking bay is relocated from the turning head. - o As the footpath crosses the site access road, a speed table is proposed. However, this is not well aligned to the footpath and should be removed. HDM agree with the removal as the speed table, as it is considered to be an unnecessary feature in this location given the proximity of the adjacent bend. Dropped crossings with tactile paving should be provided instead. - o The plans do not clearly show the proposed treatment of the PROW as it passes through the site. However, it is considered that some improvements should be provided by the development, as the footpath will provide a valuable link to Woodhead Road, particularly as the footpath heads south linking to PROW HOL/31/60 that leads to the bus stops on Woodhead Road and to Smithy Place. In addition to the above, concern is raised regarding the treatment of the access road north of plot 115 / 120, as it crosses PROW HOL/31/30 (Smithy Lane), as motor traffic could choose to use this new connection to access Smithy Lane from the site access road. Further consideration on how this situation can be safely managed is required, which must ensure that safe pedestrian access is provided to/from the PROW and that rat running along Smithy Place does not occur. The applicant is requested to consider the above issues and any necessary improvements	o Existing PROW has been accommodated and an adjoining footpath link proposed to enhance it. o Vehicular access to and from Smithy Lane is to be restricted by means of physical restrictions, i.e. kerb lines and bollards.
Electric Vehicle (EV) Charging		
8	EV charging points should be proposed throughout the development and clearly presented on EV charging plan drawing, as follows: - Externally mounted to houses; - Internally mounted; - On mounting post adjacent to parking bays. EV charging should be secured by a Planning Condition and cross-referenced to the submitted EV drawing submitted in support of this application.	o EV charging points are to be provided in accordance with Drg 05 Rev B
Construction Access Strategy		

9	During the construction of this planning application phase, a Construction Management Plan (CMP) will be implemented which will address any potential impacts arising from the development and ensure that the Site operates efficiently and safely. A CMP should address construction hours of operation, treatment of delivery vehicles (wheel washing requirements, sheeting etc) and access routes to/from the Site. HDM advises that a CMP is secured by planning condition and that additionally, a specific planning condition is secured relating to: -Wheel washing facilities; -Carriageway and footway condition survey (pre and post construction).	o Construction Management details provided on Drg 04.
Highway Design Comments		
10	v. The proposed earthworks modelled to form a site access should be assessed for site safety and a RRAP assessment should be carried out to determine if a vehicle restraint barrier is necessary;	o Following finalisation of the S38 designs Optima will be employed to review the S38. Nonetheless this will be submitted as part of the formal S38 submission and any vehicle restraint will be confirmed at detailed design stage.
11	viii. The site access must have a corner radii of 6m minimum. If the Kirklees Council refuse vehicles struggles to negotiate the junction, then the corner radii must be increased to 10m;	o The S278 junction proposals have been updated by ATTP accordingly on 18001-P-003 Rev C.
11A	viii. The site access must have a corner radii of 10m minimum. Additional widening may also be required to ensure that the Kirklees Council refuse vehicle can turn into the site past a vehicle waiting to exit the site access junction;	o The S278 junction proposals have been updated by ATTP accordingly on 18001-P-003 Rev C.
12	The A6024 Woodhead road has a segregated on-carriageway cycleway route that has not been account for at the proposed site access junction. Proposals need to be modified to reflect and integrate this existing facility;	o Cycle route to Woodhead Road be maintained and accommodated as part of the S278 proposals. It is considered that for on site typical cycle practices will I be adopted i.e. shared road space with vehicles.
Site Layout		
13	I. Provision of visitor bays must be to a ratio of 1:4 to the total number of dwellings proposed. Hence, a minimum of 37 spaces are required, when an allowance only circa 20	o Car parking has been provided in accordance with SPG.
14	iii. The main internal road alignment into the site seems jagged in places and has very tight centreline alignment- this is unacceptable. A minimum 20m centreline radius on the internal road should be used to ensure refuse swept paths of refuse vehicles are not compromised. The following is noted with regards to your development: - - o The radius seems too tight for contra-flow vehicular flow and is unacceptable just off the site access junction; - o The radius seems too tight for contra-flow vehicular flow and is unacceptable near plot nos. 1 to 4;	o The S278 junction proposals have been updated by ATTP accordingly on 18001-P-003 Rev C. The site layout has been designed to these principles accordingly. o ATTP have provided updated swept path analysis within Rev A of the TA. The site layout as proposed accommodates vehicular manoeuvres.
15	vi. Any bell mouths formed off this road should be staggered 25m apart and have visibility splay tangent with a y distance of 25m and x distance of 2.4m. Current proposals may need to be amended to suit if they do not comply;	o The site layout generally complies with this requirement. Nonetheless all junctions have been tracked and appropriate visibility standards afforded as per Rev A of the TA.
16	vii. All corner radii are required to be 6m minimum to assist with refuse swept path movements, this is to also to be required at all proposed turning head areas too;	o The site layout complies with this requirement.
17	viii. Vertical speed control features (e.g., speed tables) are discouraged- However, if proposed should be less than 60m apart for them to be effective;	o These have been removed, except for transitioning between road types.
18	ix. All roads are required to have forward visibility of 25m throughout and especially around bends. Visibility envelopes around bends are required to be illustrated to ensure any proposed plots do not interfere. Initially, a sight stopping distance of 25m is to be used but can be relaxed to 23m if it impacts a proposed plot location. Current proposals need to be amended to suit; x. All areas required for visibility must be included in the adoptable carriageway. Any areas of visibility that fall within private driveways and gardens are not acceptable and proposals should be amended to suit;	o The site layout generally with this requirement. o The forward visibility splays will be included within the prospectively adoptable highway and will be concluded as part of the subsequent detailed S38 submission.
19	xii. Where on-street parking is envisaged, swept path analysis is required to demonstrate if the Kirklees Refuse Vehicle can manoeuvre through;	o ATTP have provided updated swept path analysis within Rev A of the TA.
20	xiii. No swept path analysis (SPA) drawings have been provided for our assessment for the development layout. The current development proposal shown strongly indicates issues with refuse vehicle manoeuvrability;	o ATTP have provided updated swept path analysis within Rev A of the TA.
21	xiv. SPA is required on all turning head areas and severe bends to optimise their size in relation to refuse vehicle movements;	o ATTP have provided updated swept path analysis within Rev A of the TA.
22	xv. On all turning heads it is required to demonstrate using swept path analyses that when manoeuvring, Refuse Collection Vehicles, shall be able to travel at a minimum speed of 5 km/h. In other words, drivers shall not need to stop to adjust the steering while stationary before setting off again. The Kirklees vehicle parameters are set out in Table 1 of Emergency Access, Waste Management, Servicing & Deliveries - April 2020 (version 1): - - o Length – 11.85 m - o Width – 2.50 m (including wing mirrors) - o Width when loading – 4.10 m - o Working height – 6.00 m - o Turning circle (wall to wall) – 22.07 m (diameter) - o Turning circle (between kerbs) – 17.88 m (diameter) - o Gross vehicle weight – 32 t.	o ATTP have provided updated swept path analysis within Rev A of the TA.
23	xvi. Bin collection points need to be shown, as they are required to assess if the refuse vehicle can effectively access them with the adoptable Section 38 carriageway area;	o Added to the site layout accordingly.

24	xvii. Around tight bends in the carriageway consideration should be given to making provisions for overrun areas or localised carriageway widening where required following SPA checks;	o ATTP have provided updated swept path analysis within Rev A of the TA. The site layout as proposed accommodates vehicular manoeuvres.
25	xviii. To transition from the widened existing tarmacked road to the proposed Section 38 block paved road a ramp should be introduced that should be no steeper than 1:12;	o Added to the site layout accordingly.
26	xx. Around bends SPA for two normal size vehicles being able to cross each other in the contraflow direction needs to be demonstrated too;	o ATTP have provided updated swept path analysis within Rev A of the TA. The site layout as proposed accommodates vehicular manoeuvres.
27	xxi. Around tight bends in the carriageway consideration should be given to making provisions for overrun areas or localised carriageway widening;	o ATTP have provided updated swept path analysis within Rev A of the TA. The site layout as proposed accommodates vehicular manoeuvres.
28	xxii. New 2-to-3-bedroom dwellings within Kirklees must provide 2 no. off-street car parking spaces, with 4+ bedroom dwellings providing 3 no. off-street car parking spaces. Any new 1–2-bedroom apartments must provide 1 space, where 3+ bed providing 2 no. spaces. One cycle space per unit is recommended;	o Car parking has been provided in accordance with SPG.
Other Items for Consideration		
29	ii. Details of proposed surface finishes have not been provided for comment. From the block plan it is assumed that the main residential road will be block paved;	o Now clearly indicated on the site layout accordingly.
30	iii. A Stage 1 Road Safety Audit with designers’ comments is required. The Audit must comply with GG119 and an audit brief must be approved beforehand;	o Stage 1/2 RSA completed for S278 by Optima. Following finalisation of the S38 designs Optima will be employed to review S38. Nonetheless this will be submitted as part of the formal S38 submission.
31	iv. Landscaping plans must be provided to ensure proposed trees do not impact on necessary highway visibility. All proposed trees need to be assessed and relocated to be placed outside of any required visibility splay/envelopes;	o Landscaping details are submitted for consideration.
31A	It is noted the highway layout plans do not show the existing / proposed trees within the site. These should be shown on the amended highway plans, to ensure that the layout is in accordance with the NPPF and the Councils Highway Design Guide SPD & Housebuilders Design SPD, which require streets to be tree lined, and to ensure that any trees do not have any adverse impact on road safety and amenity.	o Added to the site layout accordingly.
32	vi. Any proposed combined cycle route will need to be 3m wide. There seems to be no provision for cyclist within the development- proposals need to be amended to accommodate minimum requirements in accordance with LTN 1/20 Cycle Infrastructure Design.	o Cycle route to Woodhead Road be maintained and accommodated as part of the S278 proposals. It is considered that for on site typical cycle practices will be adopted i.e. shared road space with vehicles.
Bridge and Structures		
33	Before the development commences a scheme detailing the location and cross sectional information together with the proposed design and construction details for all new retaining walls/ building retaining walls adjacent to the existing/ proposed adoptable highways including any modifications to the existing retaining walls supporting the A6024 Woodhead Road and public footpath (HOL/31/30) 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.	o Recommended Planning Condition. o Existing retaining walls to Woodhead Road are designed out by the proposed S278 works. The S278 proposals are being assessed by the Highway Design team o Dialogue with Farhad Khatibi has been opened on retaining structures.
34	2)No development shall take place until the design and construction details for all temporary and permanent retaining structures supporting the embankment within the site have been approved in writing by the Highway Authority. The details shall include a design statement, all necessary ground investigations on which design assumptions are based on, method statements for both temporary and permanent works, removal of any bulk excavations, a full slope stability analysis together with structural calculations and all associated safety measures for the protection of adjacent public highway. All highway retaining structures shall be designed and constructed in accordance with the approved details and shall be so maintained throughout the life of the development unless otherwise agreed in writing by the Highways Structures Section.	o Recommended Planning Condition. o Existing retaining walls to Woodhead Road are designed out by the proposed S278 works. The S278 proposals are being assessed by the Highway Design team o Dialogue with Farhad Khatibi has been opened on retaining structures.
35	4)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 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.	o Recommended Planning Condition. o The subsequent formal S38 submission will satisfy this condition. Note however there are no oversize sewer pipes or structures within the prospectively adoptable highway.
Travel		
36	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. For this development the lower rate that applies to ‘Small Scale Major Development’ (residential developments of between 50-199 units) is applicable, which is £2,000 per annum for the first five years from the development being brought into use. The above fee will cover assistance with the development of the Draft Travel Plan into a Full Travel Plan in discharging the Travel Plan condition, and assist the Travel Plan Co-Ordinator in implementing, maintaining, and monitoring the approved Travel Plan. The total Travel Plan Monitoring Fee is £10,000 (5 x £2,000) and should be secured in the S106 agreement.	o Refer to the Travel Plan dated December 2021 Ref P1041P_20210518.