Consultation Response from Chris Bembridge KC,
Highways Development Management

2022/92097 The Veterinary Hospital, 131, Somerset Road, Almondbury, Huddersfield, HD5 8HN

Erection of two storey extension and alterations

Date Responded: 22/09/23
Responding Officer:CNB
Responding Ref: K6-12NE/1

These highways consultation comments are based on additional information supplied by the applicant in the form of a revised Travel Plan dated July 23, and these comments should be read in conjunction with the previously submitted comments, as appended below.

This application is for the erection of a single-story extension to an existing vets practice with parking and an access on to C997 Somerset Road, a 30mph two way single carriageway local distributor road of approximately 8.7m width with footways on both sides and street lighting present. The site joins C997 at a new mini roundabout and to the north of the roundabout there are parking bays to the front of residential dwellings opposite the site.

The vet hospital was recently constructed as part of application 17/94302.

Highways consultation comments were previously submitted for this application (original and previous responses added below) and concern was raised that the original development was causing parking and road safety issues on the surrounding highway network and that this would need addressing before we would be willing to consider an extension to the existing building as we considered that the proposals could increase the severity of the issues noted.

The additional information submitted by the applicant was to remove the need for a Travel Plan condition discharge application post decision. The initial condition requested by highways was worded as:

Condition
Within the first 3 months of any part of the development being brought into use a Full Travel Plan shall be submitted to and approved in writing by the LPA. The travel plan shall include measures to improve and encourage the use of sustainable transport. The measures will include as a minimum:

- the provision of 'live' and other bus/train information
- membership of the YWCA Travel Plan Network
- provision of METRO passes
- car sharing facilities
- the introduction of working practices to reduce travel demand
- the provision of on-site cycle facilities and information and
- the management of the car park to ensure staff parking is provided to a suitable level.

The Travel Plan will include details of when these measures will be introduced.

To support the promotion of the use of sustainable modes the travel plan will also include: how the travel plan will be managed; targets aimed at lowering car use, particularly single occupancy trips, from/to the site, management of staff car parking and how the travel plan and its objective of more sustainable travel will be promoted. The approved travel plan shall thereafter retained throughout the lifetime of the development unless otherwise agreed in

writing by the LPA.

This condition was added and worded specifically to deal with the parking issues that have occurred on the surrounding highways due to the operation of the proposal site and the expected intensification of these issues with the increase in treatment rooms from 6 to 10.

The revised Travel Plan from Via Solutions and dated July 2023 is an improvement on the previous TP submission with further detail being provided to cover the areas of concern that we highlighted in the previous highway's comments.

The objectives of the Travel Plan are targeted predominantly at employees rather than clients and this is acceptable, with any targeting of information to customers being of an advisory nature to assist them to change the mode of their travel to the vet hospital if it would be suitable.

The site characteristics and development proposals section list bus stops along A629 Wakefield Road as being within preferred 800m walking distance, this contrasts with the information provided within paragraph 3.3.4 which indicates that the routes from the stops on Wakefield Road are not attractive during the hours of darkness. The Wakefield Road sites currently carry bus services that operate early enough to allow the 07:30 shift workers to use them. No details were provided as to why the routes were not attractive or any suggestions of how these routes could be made more attractive. This may be required as mitigation if the targets are not met and the shift in travel mode to public transport is deemed necessary.

The bus stops marked within a desirable 400m walk of the site don't carry services that arrive prior to the 07:30 shift times.

These issues may influence take up levels for public transport for early shift staff, however it should be promoted for staff starting later or visitors to the site from other Donaldson's Vet surgeries around the region that are attending meetings as the proposal site appears to operate as a "head office".

Paragraph 5.1.1 indicates that there are 4 cycle parking spaces, Kirklees Highways Design Guide standards are for 1 safe and secure cycle parking space per 10 staff, for the quoted 72 staff this would equate to 7 cycle spaces. The journey to work survey provided with the TP indicates that no staff cycled to work and so the 4 spaces may be sufficient at the moment, however if promotion of active modes over single car use is successful, there may be an opportunity to increase the cycle parking or improve it to something more attractive to cyclists thus promoting its use.

Paragraph 6.2.3 mentions the package of measures to control on street parking within the vicinity of the site, this is to be part funded through a s106 agreement, however at time of writing this has not been sealed yet and so the Kirklees Highway Safety team have been unable to progress the scheme.

Paragraph 6.3.2 mentions the offer to provide a Personalised Travel Plan (PTP) to staff if requested and this is welcomed due to the impact that PTP can have on modal shift towards sustainable travel. This should be heavily promoted to all staff not just new staff as simple sustainable mode changes may not always be obvious to established staff without the nudge that PTP can provide.

The role of the Travel Plan Coordinator has been provided in detail and with contact details provided in section 8 of the travel plan, this is acceptable.

The initiatives to promote active/sustainable travel are acceptable and details of these promotions and their success levels should be included in the annual monitoring reports.

A specific reference to joining the West Yorkshire Combined Authority (WYCA) Travel Plan Network (TPN) is included in paragraph 6.3.21, this was requested previously as the organisation can provide excellent information and guidance for the promotion of sustainable travel modes and can offer other incentives such as discounted travel passes for staff. As part of membership, organisations are required to submit annual monitoring to the TPN and this could be tied in with the monitoring required as part of the Travel Plan condition.

It should be noted that TPN membership could provide benefits to the whole Donaldson's Vets network and not just at the Almondbury Veterinary Hospital.

Paragraph 6.3.25 referred to a proposed car share scheme, but no further details were provided on how this will work or whether it will be based on one of the existing online car share schemes. These details can be included as part of the monitoring reports and added to the TP later when more details are available.

Section 6.4 Car Park Management Plan suggests, in paragraph 6.4.1, that the proposals would only be used for triage at the veterinary hospital, however this cannot be conditioned and so after permission has been gained the rooms could be used for formal treatment. It also states that the triage service would increase client throughput but not increase visitor numbers. These two statements appear to contradict one another. The increase in rooms will increase the number of animals that can be within the veterinary process at the same time, and this may cause an increase in trip generation. The use of triage would have very little impact on car parking demand and appears more to be an organisation operational change. However, the Travel Plan is to be targeted mainly at staff and so even though an increase in visitors may increase parking demand slightly, the main points of concern can still be addressed by the Travel Plan.

Paragraph 6.4.4 states that car share vehicles will be allocated priority parking on site, this is an acceptable way of promoting car share, however there may be problems identifying if a car has multiple occupants or not, or how far the "lift" has been occupied. This has been identified as an existing issue with some of the car-share software developers where "rewards" for car share are included in the scheme and some of their software does contain methods to override abuse of the system. The TPN may be able to provide advice relating to car share.

The targets mentioned in section 7 have been obtained from an initial staff survey and have been compared against 2021 Census travel to work data, however no details were provided on the exact Lower Super Output Areas (LSOAs) were used beyond the information that they covered the surrounding 10 miles. The site is located within the Kirklees 040 Medium Super Output Area (MSOA) and this provides slightly different percentage figures than the Census data submitted in Table 5. The targets suggested are both challenging but achievable and a modal shift of 10% from single user car trips are acceptable, however if the modal shift target could be based on the available staff parking, this may better resolve the recorded parking issues.

The results of the travel surveys will be monitored for 5 years and paragraph 7.1.12 states that the travel plan will be extended for a further year with the agreement of the council.

Section 8 provides details of the name, address, contact number and e-mail address of the travel plan co-ordinator. This is acceptable.

Paragraph 10.1.4 covers monitoring and annual surveys and states that a minimum response rate will be set at 30%, this appears quite low for a small business where management may have a greater ability to impose the requirement for a response on their staff, and we would expect a much greater response rate than 30% to be recorded.

Paragraph 10.2.1 states that if targets are not met then the TPC will liaise with the council's travel plan officer and WYCA TPN on potential measures to resolve this. No details of proposed mitigation have been suggested, although we would expect this to be based on the results of the annual surveys to identify the best proposals to achieve the targets.

With this additional information contained within the Travel Plan document and the usual convention that Travel Plans remain a "live" document for the length of the travel plan to allow for future agreed changes, we are now sufficiently happy with the details provided to reword the Travel Plan condition.

The parking management plan (measures to manage parking) is awaiting the sealing of the s106 agreement and payment of funding to the Kirklees Road Safety Team for them to progress the parking management scheme.

Previous Comments (submitted 23/05/23)

These highways consultation comments are based on additional information supplied by the applicant in the form of a Travel Plan, and these comments should be read in conjunction with the previously submitted comments, as appended below.

This application is for the erection of a single-story extension to an existing vets practice with parking and an access on to C997 Somerset Road, a 30mph two way single carriageway local distributor road of approximately 8.7m width with footways on both sides and street lighting present. The site joins C997 at a new mini roundabout and to the north of the roundabout there are parking bays to the front of residential dwellings opposite the site.

The vet hospital was recently constructed as part of application 17/94302.

Highways consultation comments were previously submitted for this application (original and previous responses added below) and concern was raised that the original development was causing parking and road safety issues on the surrounding highway network and that this would need addressing before we would be willing to consider an extension to the existing building as we considered that the proposals could increase the severity of the issues noted.

The additional information submitted by the applicant was to remove the need for a Travel Plan condition discharge application post decision. The initial condition requested by highways was worded as:

Condition

Within the first 3 months of any part of the development being brought into use a Full Travel Plan shall be submitted to and approved in writing by the LPA. The travel plan shall include measures to improve and encourage the use of sustainable transport. The measures will include as a minimum:

- the provision of 'live' and other bus/train information
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- car sharing facilities
- the introduction of working practices to reduce travel demand
- the provision of on-site cycle facilities and information and
- the management of the car park to ensure staff parking is provided to a suitable level.

The Travel Plan will include details of when these measures will be introduced.

To support the promotion of the use of sustainable modes the travel plan will also include: how the travel plan will be managed; targets aimed at lowering car use, particularly single occupancy trips, from/to the site, management of staff car parking and how the travel plan and its objective of more sustainable travel will be promoted. The approved travel plan shall thereafter retained throughout the lifetime of the development unless otherwise agreed in writing by the LPA.

This condition was added and worded specifically to deal with the parking issues that have occurred on the surrounding highways due to the operation of the proposal site and the expected intensification of these issues with the increase in treatment rooms from 6 to 10.

The submitted Travel Plan is a standard interim travel plan albeit with full Travel Plan Co-ordinator contact details and the initial travel survey of staff. The condition specifically mentioned membership of the WYCA Travel Plan Network and management of the car park to ensure car parking is provided to a suitable level (a suitable level being one that doesn't cause parking issues on the surrounding streets). The travel plan as submitted fails to cover these two points sufficiently.

We would wish to see a section within the travel plan that explicitly deals with parking and includes a car park management plan that shows how parking will be allocated to staff and clients, with adequate parking resources made available to cover all staff parking requirements on site. If this is not possible for some reason this needs to be explained and travel plan initiatives linked directly to the problem.

The Travel Plan includes details of bus services within the area, however there are no details that indicate that the services listed tie in with shift times at the vet hospital beyond the reason that the % of vet employees using single occupancy car use is higher than travel to work census data because of the shift work falling outside public transport services hours. If these do not coincide, then promotion of bus use would be ineffective to reducing car trips. It is not envisaged that may clients would bring their pets on the bus and so this would be mostly useful to staff travel. The TP should provide details of initiatives that would reduce single car use while promoting suitable alternatives that fit in with the existing shift patterns.

The initial staff survey revealed that 90.3% of staff used single occupancy cars to travel to work as opposed to only 71.7% from the 2021 census data from a radius of 10 miles from the site, however the targets to reduce single car use proposed in paragraph 7.1.9 is only 1% per annum, this would only

reduce single car use to 85% over 5 years. We would prefer to see a more challenging but achievable target proposed for this modal shift.

The monitoring period of 5 years with extensions if the targets are not reached or maintained is acceptable, however we would not request a monitoring fee and so the support offered by the council will be limited.

With this we do not feel that the Travel Plan as submitted is suitable to remove the post-commencement condition as it does not fulfil the wording of the proposed condition and as such would not achieve the desired impact on the parking concerns associated with the site.

With relation to the Parking Management condition, worded as;

Implementation of Car Park management plan to manage parking
The development shall not commence until a contribution of £5,200 has been made towards a scheme detailing measures to manage parking within the parking bays on Somerset Road between and at the junctions of Somerset Road with Langley Road, Broadgate and Foxglove Road and all associated works as proposed by The Local Planning Authority. Secured by s106 agreement.

The proposed condition relating to management of parking was to cover a parking management strategy and the funding contribution towards measures to manage parking. The travel plan condition contains specific wording to cover a parking management plan as part of a travel plan and so if the s104 funding contribution of £5200 towards measures to manage parking off site is agreed and signed prior to determination we would be happy to have the parking management condition removed.

Details of the proposed measures to manage parking off site are to be provided by the Kirklees Highway Safety engineering team.

Previous Comments (submitted 07/02/23)

This application is for the erection of a single-story extension to an existing vets practice with parking and an access on to C997 Somerset Road, a 30mph two way single carriageway local distributor road of approximately 8.7m width with footways on both sides and street lighting present. The site joins C997 at a new mini roundabout and to the north of the roundabout there are parking bays to the front of residential dwellings opposite the site.

The vet hospital was recently constructed as part of application 17/94302.

Highways consultation comments were previously submitted for this application (original response added below) and concern was raised that the original development was causing parking and road safety issues on the surrounding highway network and that this would need addressing before we would be willing to consider an extension to the existing building as we considered that the proposals could increase the severity of the issues noted.

A supplementary document was then submitted by the applicant in the form of a Highways Technical Note from VIA Solutions dated October 2022.

As part of this Technical Note the applicant's highway consultant suggested that the previous highways

response was based on “anecdotal information” and that as no details were included that the concerns were not genuine. A brief “spot photographic survey” examination of the immediate area around the site was then carried out by the highways consultant and the conclusion was reached that the proposal site was not responsible for the parking issues recorded.

In response to this, the comments were based not on “anecdotal evidence” but on observed photographic evidence and an investigation into the resident’s parking concerns carried out by the Kirklees Highway Safety team as part of the proposals to install TRO restrictions for parking within the area. The Kirklees Highway Safety team would not base a costly TRO parking scheme on “anecdotal evidence”.

The ‘spot photographic survey’ represents a very brief snapshot and in no way can be considered thorough enough evidence as to be considered the basis of a proper parking survey on which to base any meaningful conclusions. We would recommend for the avoidance of doubt that an independent full parking survey should be undertaken in the area with the scope agreed with the highway authority prior to commencement.

The highways analysis for the initial application for the Vet hospital was based on a car parking demand analysis and this showed that the number of spaces proposed would be adequate for the number of staff and clients proposed within the application. The approval contained conditions that the car park would be managed with a client booking system with allocation of a numbered parking space at the time of booking and a named car parking manager to ensure there were no parking issues. Drawing No 3155/50 submitted as part of the discharge for condition 11 shows the car park layout with spaces delineated into staff and client parking, with a total of 14 spaces designated as staff spaces.

It is clear that these conditions, although now discharged, are not working given the evidenced parking issues within the surrounding roads.

This application is for a single-story extension

The current proposals, although not considered as being severe in themselves, are expected to increase trips to the site and, when added to the existing issues and concerns caused by the site, would add a cumulative effect on to the problems experienced in the immediate area.

As indicated earlier the Kirklees Highways Safety team have been investigating the parking complaints generated by the Vets and they have drawn up a permit and restricted parking scheme that should go some way to alleviating the issues, and, due to the proposal site causing the problems, we would expect the applicant to make a contribution towards the TRO investigation and works of approximately £5200, secured by s106 agreement.

We would also request that the applicant submits a staff Travel Plan that will contain details of how, as an organisation, the applicant will promote sustainable travel for staff and support the use of sustainable travel and car share to reduce the number of staff vehicles needing to come to the premises which should, in turn, reduce the requirement for off site parking. As part of the Travel Plan, we would request that the applicant joins the West Yorkshire Combined Authority Travel Plan Network to allow them to take advantage of the sustainable travel offers that the TPN has to offer. This should be conditioned, in this instance and given the scale of the development, the Highway Authority would not seek a Travel Plan monitoring fee.

We consider that these two conditions would reduce the impacts that the proposals will have on the already affected local highway network sufficiently as to make the proposals acceptable to highways.

Conditions
Implementation of Car Park management plan to manage parking
The development shall not commence until a contribution of £5,200 has been made towards a scheme detailing measures to manage parking within the parking bays on Somerset Road between and at the junctions of Somerset Road with Langley Road, Broadgate and Foxglove Road and all associated works as proposed by The Local Planning Authority. Secured by s106 agreement.

Travel Plan
Within the first 3 months of any part of the development being brought into use a Full Travel Plan shall be submitted to and approved in writing by the LPA. The travel plan shall include measures to improve and encourage the use of sustainable transport. The measures will include as a minimum:

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The Travel Plan will include details of when these measures will be introduced.

To support the promotion of the use of sustainable modes the travel plan will also include: how the travel plan will be managed; targets aimed at lowering car use, particularly single occupancy trips, from/to the site, management of staff car parking and how the travel plan and its objective of more sustainable travel will be promoted. The approved travel plan shall thereafter retained throughout the lifetime of the development unless otherwise agreed in writing by the LPA.

Original Consultation response (sent 10/08/22)

This application is for the erection of a single story extension to an existing vets practice with parking and an access on to C997 Somerset Road, a 30mph two way single carriageway local distributor road of approximately 8.7m width with footways on both sides and street lighting present. The site joins C997 at a new mini roundabout and to the north of the roundabout there are parking bays to the front of residential dwellings opposite the site.

The vet hospital was recently constructed as part of application 17/94302.

The current application was accompanied by a Technical Note: Highways dated Sept 2021 from Via

Solutions, which provides highways and transport advice to address any highways impacts that the proposals may have.

No trip generation details were submitted with the application. The Technical Note suggested that the proposals will increase the number of treatment rooms from 6 to 10, and these will be used for veterinary nurse triage work to assist the vets and as such there would be no additional staff employed. It would however "increase the client throughput" which would indicate an increase in customer trip generation to the site.

The Technical Note also suggests that the business is expected to use COVID compliant working practices for some years to come and "this requires a strictly controlled appointment system to manage customers visiting the site" although no details of this system was provided within the Technical Note.

The Kirklees highway safety team has a number of records of complaints of dangerous and unsociable parking in the area that have been received since the veterinary hospital opened and are currently investigating these complaints in relation to the implementation of parking controls including the possible introduction of "No Waiting At Any Time" and residents only permit parking schemes along Somerset Road and the local adjoining residential streets. The highway safety investigation has concluded that the current parking problems are being caused by employees at the veterinary hospital parking on the surrounding residential streets rather than in the existing car park. It should be noted that the parking complaints started prior to any Covid compliant working practices being required and so the problems are not based on the pandemic working arrangements.

When the initial application for the erection of the hospital was submitted, the number of parking spaces proposed was accepted based on a calculation of the parking demand for both staff and customers, with a customer parking management plan put in place to allocate spaces at the time of booking an appointment. This arrangement does not appear to be working. It has been suggested that the issue has been created by management at the site banning staff from parking within the car park, however this has not been officially confirmed as the source of the problems.

The current proposals are to increase the number of practice rooms and subsequently increase the client throughput, which can only increase the parking demand, while at the same time reducing the number of parking spaces within the site. This would be expected to create a higher parking displacement on to the surrounding highway network, and the application does not indicate how this concern will be alleviated.

HDM are unable to support any further development at this site that would increase the amount of on street parking within this area.

Consideration needs to be given to addressing the existing parking issues caused by the development prior to any further parking demand being generated. Measures could include measures to control on street parking, parking management plan or the introduction of a travel plan for staff including membership of the West Yorkshire Combined Authority's Travel Plan Network, in order to access advice and public transport offers to reduce the parking demand at the site.

In summary, HDM are unable to support the proposals until existing parking issues associated with the current development have been satisfactorily addressed.