Consultation Response from KC, Highways Development Management		
2023/90668 Grange Moor Coachworks, Barnsley Road, Grange Moor, Huddersfield, WF4 4DR		
Erection of B2/B8 Industrial Unit and associated works		
Date Responded: 31/05/23	**Responding Officer:** A Darwin	**Responding Ref:** HDC 16-5/1

RECOMMENDATION: Further information required

Further information is required regarding the following issues, which are detailed in the main body of the report:

- Amendments to the site access proposals are required, which include fully dimensioned plans, swept path analysis and details of any proposed departures from standard. Once the arrangements are agreed in principle, the designs must be subject to the Stage 1 Road Safety Audit process prior to determination;
- Off-site improvements are required to improve the sites accessibility by non-car modes, including improvements to pedestrian/cycle facilities on Barnsley Road and at Grange Moor Roundabout, and improvements to nearby bus stops.
- Various alterations to the site layout are required.
- Further details of the proposed site operation are required, including proposed staff numbers, shift patterns, operating hours etc. This information should then be used to inform the Transport Assessment process and to further develop the sites Travel Plan.
- The Travel Plan needs to be updated to provide a more comprehensive package of measures, a more thorough review of the sites accessibility, user-specific modal split information and targets, and clear information regarding the approval, monitoring and review processes.
- The trip generation and distribution information identified within the Transport Assessment needs to be based on end-user specific survey data, for both staff and operational trips. Further capacity assessments are then required based on an assessment methodology agreed in advance with HDM.
- Further justification and amendments to the on-site parking provision is required, which should take into account the end-user specific requirements based on empirical survey data.

Development Overview:

A detailed planning application has been submitted for a B2/B8 Industrial Unit and associated works. However, as advised by the applicant on 25/05/26, the application description has been amended as follows:

'Erection and operation of a single building comprising a Sui Generis land use limited to the purpose of storage, assembly, sale and distribution of custom-built computers, laptops and their components as well as any associated works (those being drainage, access, hard and soft landscaping) within the red-line boundary alongside business operations pursuant to the effective administration of the Sui Generis use.'

The proposed development is required to accommodate the business expansion of PCS (PC Specialist), who manufacture high performance custom computers and laptops. PCS currently operate from two units located at Jubilee Business Park, Grange Moor, which is in close proximity to the application site.

Based on the supporting planning statement, it is understood that PCS currently employ 205 staff, which include manufacturing, sales and other support staff. The proposal site is intended to allow expansion of the current business that would initially increase staff to circa 400 (as confirmed on the application form and planning statement), with scope for future expansion to 800-1,000 FTE staff.

There is currently limited information within the submission regarding the existing and proposed operation of the PCS business, including operating hours (the Travel Plan states that the operating hours are 0800-1900hrs) and shift patterns etc. However, some additional information has been provided by the planning agent on 24/05/23, as follows:

'Regarding shift patterns, we currently open Monday to Friday from 8am until 8pm and the call centre is open on Saturdays from 9am until 5pm. Some staff occasionally arrive and start work at 6am and at peak times when overtime is required, we have worked past 10pm in the evenings. The shift patterns really need to allow us to work within these hours, noting that the staff will be located internally with no noise or disruption to the neighbours. Most deliveries usually finish after 5pm.'

Whilst this additional information is welcomed, further clarity is required on how the development is intended to operate, with detailed information required regarding peak staff numbers (split by job type/shift pattern), shift patterns, operating hours/days etc. to enable HDM to assess the proposals, as clearly these matters will have a significant bearing on the development trip generations and parking requirements, which would be significantly higher than currently assessed should the peak 800-1,000 FTE staff be realised in future.

The proposed development includes a single building, with a GFA of circa 13,200sq.m. However, it is understood that changes to the building layout are currently being developed by the applicant, and this may result in changes to the GFA. It is noted that the supporting Transport Assessment currently only assesses a development of 8,320sq.m GFA, which is based on the building footprint and so does not assess the scale of development proposed and needs to be corrected (also see further comments below relating to the Transport Assessment, which identifies the need for a user specific trip generations assessment for this Sui Generis use).

The proposed development includes a significant amount of on-site parking to accommodate staff and visitors use. However, the exact level of parking provision is unclear, with some inconsistencies in the supporting documents that need to be clarified. However, based on the information contained in the Transport Assessment and Travel Plan, it is understood that the parking provision is as follows:

- 309 car parking space, which includes 258 staff spaces in the main car park, and 45 'executive'/visitor bays and 6 (2%) disabled/accessible bays in the car park to the east side of the building.
- 25 (8%) of the above parking bays are proposed to include EV charging facilities.
- A 12 bay covered bicycle store is proposed within the parking area to the east of the building.

In addition to the above development, a 4 bays EV charging facility is proposed to the south of the main site, which is intended for public use.

The proposed development would replace all of the existing uses at the site, which include Grange Moor Coach Works, Holgate Construction Limited and a small café unit.

Reference to Plans/Documents:

- Planning Statement prepared by Acumen;
- Design and Access Statement prepared by Acumen;
- Travel Plan prepared by Sanderson Associates ref. 151716/002/02 dated Feb. 2023;
- Transport Assessment prepared by Sanderson Associates ref. 151716/001/02 dated Feb. 2023;
- Proposed Masterplan drawing P2753-ACU-XX-DR-A-102-01 (including in TA);
- Proposed (Highway) Works drawing 151716/001A (including in TA);
- 'Swept Path Analysis – Articulated Vehicle (16.5m)' drawing 151716/002 (including in TA);
- 'Swept Path Analysis – Articulated Vehicle (16.5m)' drawing 151716/003 (including in TA);
- 'Available Visibility Splays from the three access and egress junctions' drawing 151716/005 (including in TA);
- 'Swept Path Analysis – Articulated Vehicle (16.5m)' drawing 151716/002 (including in TA);

Policy and guidance:

Local Plan Policies LP5, LP19, LP20, LP21, LP22, LP23, LP24; Kirklees Highway Design Guide SPD, NPPF.

Reference should also be made to the Councils latest S38/S278 design guides, including the guidance entitled 'Emergency Access, Waste Management, Servicing and Deliveries – April 2020 (version 1)'.

Proposed Site Accesses:

The development proposes three accesses on to the A637 Barnsley Road, which would replace the 2 existing accesses that serve the current site uses. Barnsley Road is subject to a 50mph speed limit and is street lit within the vicinity of the site accesses. Barnsley Road connects to Grange Moor Roundabout circa 60m to the north of the proposed northern site access (egress only access from the proposed service yard). To the south of the proposed site accesses, Barnsley Road is subject to the 7.5T weight restrictions, which applies to southeast-bound traffic towards Flockton.

Given the nature of Barnsley Road, the site access arrangements and associated works must comply with the requirements of the Design Manual for Roads and Bridges (DMRB). However, whilst some dimensions have been provided on the submission plans, not all geometric parameters have been clearly identified. Therefore, these need to be clearly annotated on the revised submission drawings. Should there be any departures from standard within the access designs and associated highway works, these also need to be clearly identified so that any safety implications can be considered.

Notwithstanding the above, the following comments are noted regarding the proposed access arrangements, which should be taken into account in the revised submission:

Northern site access – Service yard egress

- The northern site access is proposed as an exit only from the service yard. The access is intended to be left turn only on exit, with a 8m radius on the north side and a small radius (circa 2m) on the south side to discourage right turn movements. The principle of this access point appears to be acceptable. However, the proposed layout would still allow vehicles to turn right on exit (particularly by light vehicles), which is unacceptable due to the close proximity of Grange Moor Roundabout and the lack of adequate visibility for right turning vehicles. Therefore, measures to prevent right turning vehicles must be incorporated into the proposals (e.g. a physical island on the major road, and appropriate signing/lining). The junction radii on the north side should also be amended to 10m in accordance with CD123 of DMRB.
- A 2.4x160m visibility splay has been shown to the right on exit of the site. This is in accordance with the min. standards in DMRB and is acceptable in principle. However, this will need to be rechecked once the amendments to the main site access have been incorporated (see further comments below).
- It is unclear whether a footway is proposed on the south side of the access, which is shown on the development site layout but not on the highway works plan. This should be incorporated into the proposals, and should demonstrate a suitable pedestrian crossing point that is inset into the junction in accordance with good practice.
- No swept path analysis (SPA) has been provided for turning HGV's at the junction. This should be provided for all HGV types, including max. legal rigid and articulated vehicles (including 18.5m long artics) and high reach fire appliance (should these be required). Further amendments to the access arrangements may then be required, including the provision of tapers, to ensure that HGV's can turn without encroaching the central hatching.

Main site access

- The main site access is proposed as a two-way access for light vehicles and entry only for HGV's. The principle of this access point appears to be acceptable. However, there appears to be a number of design elements that do not accord with DMRB standards that need to be addressed in a revised design, with full details of compliance or any proposed departures from standard clearly identified.
- The proposed junction alignment is not perpendicular to Barnsley Road, as required by DMRB (see para. 5.4 of CD123). Given that there are no constraints that would preclude this, this must be addressed in the revised proposals.
- There appears to be a small (circa 6m) radius on the north side of the junction, and a larger (circa 10m) radius on the south side. This is not in accordance with DMRB and Kirklees Councils standards that require min. 10m radius in this situation.
- No swept path analysis (SPA) has been provided for turning HGV's at the junction. This should be provided for all HGV types, including max. legal rigid and articulated vehicles (including 18.5m long

artics) and high reach fire appliance (should these be required). Further amendments to the access may then be required, including the provision of entry tapers, to ensure that inbound HGV's can turn without encroachment of the right tune lane on Barnsley Road or the outbound traffic lane from the site.

- 2.4x160m and 2.4x130m visibility splays have been shown at the access, looking to the southeast and northwest respectively. Whilst it is acknowledged that the 130m splay is measures up to the exit of Grange Moor Roundabout where speeds are likely to be lower, this is a departure from standard that needs to be identified on the plans and Stage 1 RSA Brief to allow the RSA Team to fully consider this matter. Similarly, the 'x' distance of 2.4m is not in accordance with DMRB (min. 4.5m is required, see p3.8/3.82 of CD123) and may need to be increased (subject to the final junction modelling assessments once these have been agreed) or alternatively a departure from standard would need to be identified.
- Junction visibility to the right of the main site access would be blocked by vehicles waiting to exit the public EV charging bay access to the southeast. This is not acceptable, and the EV charging bay access should be removed from the proposals. Any other obstructions to visibility (e.g. signage, street furniture of vegetation etc) should be clearly identified on the proposal plans, and relocated where necessary.
- Out of hour security gates are proposed at the site access. However, these need to be inset further into the site access, to ensure that a 18.5m articulated vehicle could stand clear of Barnsley Road.
- The proposed right turn lane is 3.0m wide, which is below the minimum width of 3.5m identified in DMRB (p6.10 of CD123). The TA suggest that the remaining design elements for the right turn lane are in accordance with DMRB. However, this needs to be clearly demonstrated on plan. It is noted that additional queuing length may be required in the right turn lane, which needs to be established once the junction modelling has been agreed (see further Transport Assessment comments below).
- No footways are proposed around the bellmouth of the site access junction, and no pedestrian crossing facilities have been shown. These facilities should be incorporated into the proposals, and should demonstrate a suitable pedestrian crossing point that is inset into the junction in accordance with good practice. A pedestrian refuge island may also be necessary at the junction to reduce the pedestrian crossing distance, which will be dependant on the final junction arrangement.
- There is a traffic island proposed on the southeast side of the right turn lane. This does not currently serve any purpose and should be removed from the proposals (unless it is to be used as a pedestrian island – see further comments below regarding bus stop provision).
- There is currently a layby for southeast bound traffic located immediately adjacent to the proposed right turn lane, and the interaction of these features could create safety problems. Therefore, the plans should clearly indicate whether this layby is to remain or not, and if retained, whether any amendments are required, so this matter can be considered as part of the Stage 1 Road Safety Audit.

<u>EV charging access</u>

- A separate access is proposed to the southeast of the main site access to serve the 4 no. public EV charging bays. There are a number of concerns with this access arrangement as identified below, which cannot be readily addressed. Therefore, this access is not acceptable and should be removed from the proposals. However, there may still be scope to accommodate the public EV charging bays, should they be served from the main site access instead.
- The proposed right turn lane is only 2.5m wide, which is below DMRB standards. Whilst the other geometric parameters relating to the right turn lane have not been confirmed, it is also clear that the right turn lane length is substantially below standard.
- Due to the limited junction spacing between this access and the main site access, vehicles waiting to exit the EV charging access would block visibility from the main site access.

In light of the above, changes are required to the proposed access arrangements, including amendments to the northern and central access and removal of the southern access. The revised submission must include sufficient details and measurements to confirm compliance with design standards, with any departures from DMRB that cannot be designed out of the proposals being clearly identified. Once an access design has been produced that is acceptable in principle, this will then need to be subject to the Stage 1 Road Safety Audit process, and an RSA Brief must be agreed in advance with HDM.

In addition to the above access design issues, the proposals currently lack good quality pedestrian, cycle and public transport access. As such, improvements to the site access arrangements and the local highway network are considered necessary, to facilitate and encourage access to the site by alternative modes of transport to the

private car. In particular, there is a lack of adequate pedestrian and cycle facilities at Grange Moor Roundabout, and improvements should be proposed to address these deficiencies, in accordance with local and national planning policy requirements and guidance contained in LTN 1/20. Similarly, measures to improve public transport accessibility should also be investigated, which could include new/relocated bus stops on Barnsley Road, or enhancement to the existing nearby stops (see further comments below regarding accessibility matters).

Road Safety

The supporting Transport Assessment includes an assessment of personal injury accident data within the vicinity of the site over the latest 5 year period, and identifies that there have been two incidents along the Barnsley Road frontage and 3 at Grange Moor roundabout. The Transport Assessment then concludes that *'there are no discernible accident trends within the vicinity of the site'.*

HDM do not agree with the TA conclusions and consider the accident assessment to be too limited in scope. It is also noted that there have been two cycling collisions at Grange Moor Roundabout, which is a concern and demonstrates that safety improvements for cyclists are warranted at this junction to enable safe cycle access for the development.

The development will also generate additional HGV traffic on the A637 Barnsley Road via Flockton (only westbound HGV's are permitted by the existing TRO on this route) and the B6118 Liley Lane, which are the most direct routes to/from the M1 and M62 respectively. However, these routes are not designed to modern standards, with locations where there is restricted width, visibility and alignment. As such, traffic management measures and/or other improvements may be necessary to mitigate the impact of the development on these routes. These matters can be considered in further detail once the traffic/HGV generation and distribution has been agreed (see further Transport Assessment comments below).

Adoption Issues, Site Layout, Parking and Servicing:

Site layout

The following layout comments are noted and should be addressed in the revised submission:

- The extent of the existing and proposed highway should be clearly marked on the submission drawings, which should include the junction bell-mouths and all necessary visibility splays/sight-lines.
- The internal junction to the main car park appears to be too narrow, and would not allow cars to pass. The access may also need to accommodate occasional use by larger vehicles (e.g. high reach fire appliance or cherry pickers to maintain car park lighting columns etc).
- The internal car park access is also located circa 17.5m from the service yard barrier to the west. This could result in service vehicles blocking back across the car park access. Therefore, the service yard barrier should be relocated further into the site to reduce the risk of blocking.
- Improved pedestrian / cycle access facilities are required from the local highway (as well as improvements to the highway as mentioned above) and within the site. This should include high quality routes that link to the pedestrian entrances and cycle store area(s), and should be designed in accordance with current guidance, including LTN 1/20. At present, the facilities are not of adequate quality and do not provide continuous links.
- An access barrier is proposed within the smaller parking area located on the eastern building frontage. However, it is unclear how this would operate, and the adjacent car parking bays would appear to be inaccessible due to the barrier equipment. Therefore, further details and consideration of these arrangement is required. It is also noted that not all of the submitted plans show consistent parking arrangements, with some significant differences for the eastern car park.
- No facilities for staff drop-off have been provided. This should be incorporated and include adequate turning provision.

On-site parking

As previously stated, there are some inconsistencies in the supporting information relating to the number of parking spaces that are proposed. Therefore, this should be clarified in the revised submission. Notwithstanding this, comments relating to the parking provision as currently presented is as follows:

- Only 2 % of the car parking spaces are proposed as accessible/disabled spaces, which is below the 5% provision recommended in DfT document inclusive mobility. As such, additional spaces may be required, unless justification can be provided to confirm that the provision is adequate. The layout of accessible/disabled spaces is also not in accordance with good practice, with the front/rear transfer zone located with the parking aisle.
- Only 12 cycle parking spaces are proposed, which equates to circa 4% of the car parking provision. This level of provision is considered to be too low, particularly as this is likely to be the main alternative form of transport to the site, given the sites limited pedestrian and public transport accessibility. Therefore, additional provision should be incorporated based on an ambitious cycle mode split. The proposed cycle parking should also be of high quality, and further details of the provision should be provided to confirm this (it is noted that covered facilities have been suggested, which is welcomed).
- 8% of parking spaces are proposed to include EV charging provision. However, a minimum of 10% should be provided, with scope for additional facilities to be incorporated in future.
- No motorcycle/two-wheeler parking is proposed and should be incorporated.
- Very limited justification for the level of on-site car parking has been provided, with the only justification provided in the TA stating: *'The number of spaces being made available to both staff and visitors is justified due to the limited public transport network available within the immediate vicinity of the site.'* This is not adequate justification for the level of parking proposed, which must be based on a detailed assessment of need. This should be based on the end-users requirements using empirical parking survey data, and should take into account all of the proposed Travel Planning measures (see further comments below) that are to be employed to minimise the need for car parking. The assessment also needs to take account the proposed shift patterns for staff, as traffic demand is likely to be at it's peak during shift change periods (TBC, as shift times are currently unknown).

Servicing

The proposed servicing arrangements include a one-way system through the site, with service vehicles entering via the main site access and exiting via the northern site egress. These arrangements are generally acceptable, with Swept Path Analysis (SPA) providing in the Transport Assessment confirming that articulated HGV's can utilise the 4 No. loading docks and circulate the site. However, there are some outstanding issues that should be addressed in the revised submission:

- Swept Path Analysis (SPA) is required for both side access points, to ensure HGV's can turn safety to/from the site. This should include all HGV types that will service the site, including rigid and articulated vehicles (including 18.5m long artics).
- Any gates at the main site access and site egress need to be set back to allow an 18.5m long artic to stand clear of the highway and barriers.
- The internal barrier to prevent unauthorised access to the service area may need to be inset further into the site to ensure blocking of the car park access does not occur.

At present, the supporting Transport Assessment has estimated the trip generation and distribution of HGV's based on TRICS data, and used traffic distribution data obtained from the existing site use. However, given that the end-user is known and already operates within close proximity to the site, it should be possible to provide more accurate end-user specific information in relation to this traffic and it's distribution, and this information should be provided.

As previously stated, there are road safety and operational concerns regarding additional development traffic, and in particular HGV traffic that will be generated by the development on the local highway network, particularly via the A637 through Flockton and via the B6118 Likely Lane. However, it is unclear what route outbound HGV traffic would utilise to head south on the M1, given that HGV traffic is not permitted to head east along the A637 via Flockton.

Therefore, a detailed assessment of the HGV trip generation and distribution is required based on end-user specific information, which should be possible as the end-user will be aware of their own supply chain and distribution requirements. A HGV routing strategy should then be developed to confirm the routes that will be used, which will then need to be incorporated into a Service and Delivery Management Plan (SDMP) that would be secured by condition. Whilst full details of the SDMP are not necessarily required at this stage, adequate details, including management measures and any associated mitigation measures (e.g. should additional/amended TRO's be identified as being necessary) must be identified at this planning stage.

Accessibility, Sustainable Transport and Travel Plan:

Pedestrian Accessibility

The site is located in a relatively remote location. Therefore, it is likely that only a limited proportion of staff who live locally would be able to access the site on foot, including those living in Grange Moor and Flockton. This is acknowledged to some extent in the supporting Transport Assessment. However, whilst the TA includes some basic details for walking distances, it provides little if any details on the quality of the pedestrian routes, even though it acknowledges that this is an important consideration. As such, a more detail review of the local pedestrian network is required to confirm whether there are any barriers to pedestrian accessibility, and if so, to propose measures to improve the situation.

There is currently a lack of adequate pedestrian (and cycle) crossing facilities at Grange Moor Roundabout, and improvements to this junction are expected to enable safe and convenient access to the wider pedestrian network, in accordance with local and national policy requirements.

Improvements to the pedestrian facilities at the site accesses and within the site are also required.

Cycle Accessibility

Given the location of the site and it's proposed use, it is likely that cycling will be one of the most attractive and feasible sustainable modes of transport to the development. However, other than providing a simple cycling distance plan in the Transport Assessment, little if any details have been provided about the quality (or lack thereof) of provision within the vicinity of the site.

As such, a more detailed review of the local highway network is required to confirm if there are any barriers to cycle accessibility, and if so, to propose measures to improve the situation.

There is currently a lack of adequate cycling facilities at Grange Moor Roundabout, and improvements to this junction are expected to enable safe and convenient access for cyclists, in accordance with local and national policy requirements, and guidance contained in LTN 1/20. This is particularly important due to the known safety risks to cyclists at roundabouts, which is evidenced by the cycling collisions that have occurred at this junction. Any proposed cycling facilities will also need to be linked to the on-site cycle parking, to ensure that cycle safety is maintained within the site.

Public Transport Accessibility

The site is located within walking distance of a number of existing bus stops. However, the bus services that operate from these stops are relatively limited, with circa 1 per hour/direction on Wakefield Road travelling between Wakefield-Huddersfield, and circa 1 per hour/direction on Liley Lane travelling between Grange Moor and Dewsbury. The last bus service to Dewsbury is also at 1708hrs, so may only be accessible to staff working typical office hours. In addition to these stops, the Transport Assessment suggests that the existing stops located to the southeast of the site Barnsley Road may be utilised instead, as users may seek to avoid crossing Grange Moor roundabout due to the lack of adequate crossing facilities.

The supporting Transport Assessment also indicates that public transport use may not be a viable option for some staff, due to their shift patterns and lack of bus services at start/finish times. However, no details of shift patterns have been confirmed to allow this matter to be considered in more detail, nor has the Travel Plan made any suggestion on how this issue could be mitigated (e.g. through flexible working practices).

Notwithstanding the above, HDM acknowledges that public transport use may not be possible for some staff working shifts, and that improvements to current bus service times/frequencies may not be feasible for a development of this scale. However, measures should be introduced to maximise the accessibility of the site by public transport. Therefore, the applicant should propose a package of measures to improve the public transport accessibility of the site, which should include the following as a minimum:

- Bus shelters should be available for all of the nearby bus stops that would be utilised by the development for both directions. At present, there is a lack of shelter/seating provision at the eastbound stop on Wakefield Road that serve the Huddersfield-Wakefield service (231). For information, the current cost for providing a new shelter is £23,000. It is noted that new shelters can only be provided where there is an effective width of min. 2m to ensure that a 1.5m clear footway width is maintained (See DfT document Inclusive Mobility for further details).
- Realtime bus information should be provided at the two nearest stops to the site. For information, the current cost for providing real-time displays is £10,000 per stop.
- Consideration should be given to whether new/relocated bus stops could be provided on Barnsley Road. Should these be proposed, adequate footways and crossing provision will be required.

WYCA have been consulted regarding the proposals. However, no formal comments have been provided to date. Therefore, HDM will reconsult them further once the applicant has proposed a suitable package of measures to help maximise the accessibility of the site by bus. The expected improvements to the bus stops will need to be secured by a S106 obligation.

Travel Plan

A draft Travel Plan has been provided in support of the development, which is proposed to be developed further once the site becomes operational. Whilst this approach may be acceptable for a development where the end user is unknown, this is not the case here, with the development being designed for the specific needs of PCS. As such, the Travel Plan needs to be developed further based on the specific requirements of PCS, and must take account of their specific circumstances and any barriers to accessibility (e.g. required shift patterns that may limit bus use). The Travel Plan should also be based on user specific mode split data, which could readily be obtained from their existing site in Grange Moor and not the generic census data that has been used, which looks to be unrealistic.

With regard to the specific measures in the Travel Plan, there is currently a lack of measures to encourage/ facilitate access by sustainable modes, with the vast majority of measures related to the provision of information, which whilst welcome, is unlikely to be that affective. As such, a more comprehensive package of measures and actions should be incorporated into a revised Travel Plan for review by HDM.

Other specific points relating to the Travel Plan that need to be addressed are as follows:

- Details of the proposed site operations, including working hours, staff numbers (split by job type and shift patterns) and shift patterns is required;
- Further consideration of the proposed mode split is required, which should be informed by end-user specific data and not generic census data. Once a suitable modal split has been established, interim targets should be set for single occupancy car trips, as well for sustainable transport modes.
- A more thorough review of pedestrian/cycle accessibility should be included. This should include an assessment of the quality of existing infrastructure, and identify any improvement works that are necessary (e.g. pedestrian / cycle improvements at Grange Moor roundabout and on Barnsley Road).
- The Travel Plan should be clear of what measures and actions will be incorporated, and should avoid any reference to 'consider' measures, which lacks any firm commitment.
- Reference has been made to car sharer spaces being provided. However, no details have provided of the level/location of these spaces, how they would be managed or any other associated measures that may be proposed for car sharers (e.g. guarantee lift scheme etc.). A development of this scale should also be able to operate it's own car sharing scheme for staff, which may be what is alluded to in the Travel Plan that states *'the Travel Plan Coordinator will assist staff with finding a lift share partner'.*
- The Travel Plan refers to *'Taster Tickets'* for public transport users. However, no details are provided to confirm what this would be.
- An Action Plan has been included in Appendix D. However, this does not directly correspond to all measures including in the main body of the Travel Plan, and needs to be updated (once additional measures have been incorporated).
- The Travel Plan and Action Plan should also include all key actions required of the Travel Plan Coordinator, including all timescales and procedures. This should include clear information on how the Travel Plan and measures are to be agreed, monitored and reviewed in conjunction with the LPA and

other stakeholders. The proposed timescales need to ensure that all measures are in place upon first occupation.

- To allow an effective Travel Plan to be operated at the site, a Travel Plan budget will be required to allow measures to be delivered on an annual basis, and this should be clearly set out in the Travel Plan and set at a level that would allow meaningful Travel Plan measures to be implemented.
- Safe, secure and covered cycle parking facilities must be provided, as well shower, locker, changing and drying facilities. Motorcycle parking and equipment storage should also be incorporated.
- The Travel Plan is currently aimed at staff and visitor travel only. However, measures should also be incorporated that address business use and operations.
- It is expected that the end-user would join the West Yorkshire Travel Plan Network, which should be confirmed in the revised Travel Plan.

Kirklees Council require Travel Plan monitoring fees to be secured as part of the S106 agreement. For a development of this scale (classed as a 'Large Scale Major Development' that is in excess of 10,000m²) the fee is **£15,000** (£3,000 per year for 5 years).

Construction Access Strategy

A Construction Management Plan (CMP) is required for the development and should be secured by planning condition. Additionally, specific planning condition(s) should be secured relating to:

- Wheel washing facilities; and
- Highway condition surveys (pre and post construction) and remediation.

Traffic Impact Assessment:

The supporting Transport Assessment includes an assessment of the impact of the development on the local highway network. However, the scope and assessment methodology was not agreed in advance with HDM and is not currently acceptable, with comments as follows:

Trip Generation

The current assessment uses traffic generation data obtained from the TRICS database. Whilst this approach would be acceptable for a development where the end-user was unknown, this is not the case here and this approach is not agreed.

The proposed end-user currently operates from a site in Grange Moor, in close proximity to the application site. Therefore, survey data from the applicants existing business should be used to establish the likely traffic generations for the development (by all modes and to include service vehicles). User specific trip rates/generations could then be established, taking into account the existing and proposed operating practices, staff numbers and shift patterns etc. Before proceeding with any further survey/assessment work, it is recommended that the applicants transport consultant agrees the assessment approach that is to be used with HDM, to reduce the risk of abortive work.

Whilst the current trip generation approach that has been used based on TRICS data is not acceptable and end-user specific rates need to be agreed, it is noted that the TRICS data currently provided is clearly not representative of the proposed development, as incorrect GFA data has been used and as the site selection is not representative of the development proposal and it's location. To demonstrate this, a daily vehicle trip rate for the site of 3.785 has been identified. Therefore, based on the GFA of 13,200sq.m, this would equate to a development trip generation of 500 two-way trips over a 24hr period. This is clearly not robust given that a 309 space (TBC) car park is proposed, which if full, would generate at least 618 two-way trips, even if there was only a single daily shift and if there were no other traffic generated by the development, which will not be the case.

A first principles approach to traffic generation has been used for the proposed public EV charging bays. This approach is acceptable. However, it is unclear if these trips have been assessed as new or pass-by/diverted trips.

Traffic Distribution and modal split

Development traffic distribution has been based on local method of travel to work census data, to distribute light vehicle trips on the local network. Again, whilst this approach may be acceptable for a development where the end-user was unknown, this is not the case here and this approach is not agreed.

Given that the proposed end-user currently operates from a site in Grange Moor, in close proximity to the application site, the existing travel patterns of their staff will provide the most suitable data to inform the traffic distribution assessment and modal split for proposed development. Therefore, this further information should be obtained from the end-user and the traffic distribution agreed in advance with HDM before proceeding with any additional traffic assessments. The end-user specific data should also be used to inform the modal split assessments, rather than the generic TRICS and census data that has currently been used, which is not considered to be representative.

To distribute HGV traffic on the local network, traffic distribution data from the existing businesses on the site has been utilised. Again this approach is not acceptable, given that information could be obtained from the end-users existing business, to accurately determine the likely HGV distribution and this approach should be used instead. As stated previously in these comments, the distribution of HGV traffic on the local network is of concern, and the assessment of HGV trips needs to take account of a suitable routing strategy (to be agreed), particularly for traffic heading towards the M1 that is not permitted via Flockton.

Base traffic flow data, assessment year and traffic growth

Base traffic data has been obtained on the local network on 29th November 2022, including at the existing site accesses and at Grange Moor Roundabout (which includes queue length data). This base traffic count data is acceptable to HDM. However, it is noted that the AM and PM peak assessment periods also need to take account of the cumulative development/network peak periods, to ensure that a robust assessment of traffic impact is undertaken. It is recommended that the applicants transport consultant agrees these periods in advance with HDM, once the user specific traffic generation data has been agreed, to minimise the risk of abortive work.

A design year of 2027 has been used within the assessment. However, this is not acceptable and a design year 5 years post planning submission should be utilised (e.g. 2028).

TEMPRO has been used to growth the 2022 base traffic data to 2027, using data for Kirklees 046 MSOA. This approach is acceptable. However, the growth rates will need to be amended to suit the revised 2028 design year.

As the proposed development would replace a number of existing businesses at the site, the Transport Assessment removes these flows from the base data in the 'with development' traffic scenarios, to identify the net impact of the development. This approach is acceptable.

Traffic Impact Assessment

Until the traffic data to be used in the assessment is agreed, the impact of development traffic cannot be considered in further detail. However, the following comments are noted that will need to be taken into account in the revised submission:

- The assessment needs to include all junctions where there would be an increase in peak hour trips of 30 pcu's. As a minimum this needs to include all site accesses and Grange Moor Roundabout (as included in the current scope).
- The assessment needs to include an assessment of impact within Flockton, including the impact on queuing and delay at the two single lane working sections (one priority controlled and one signal controlled).
- The current modelling of Grange Moor roundabout does not appear to be representative of existing highway conditions, with significantly longer queues identified in the queue data compared to those shown in the modelling. As such, fully validated base modelling is required for this and any other locations that are to be assessed.

- Any junction modelling of the site accesses and Grange Moor Roundabout needs to take account of the junction geometry, including any changes that are proposed (e.g. to accommodate the required pedestrian/cycle improvements), which has not currently been undertaken (e.g. the Barnsley Road arm is affected by the current site access proposals, which is not reflected in the modelling).

Planning Conditions/Section 106:

Conditions;

- To be advised

Section 106 Contributions/Requirements;

- To be advised
- Travel Plan monitoring fee - £15,000 (£3,000 x 5yrs).

Conclusion:

Further information required, see recommendation.