

Consultation Response from KC, Highways Development Management (HDM)

2023/91116 Land off, Primrose Lane, Hightown, Liversedge, WF15

Erection of 67 dwellings

Date Responded: 10/07/23

Responding Officer: A Darwin

Responding Ref: K9-5SE/3

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

- The mechanism for providing the all-purpose highway access to the site from Darley Road to be confirmed.
- Amendments to the site layout are required, including a new turning head for Plot 4-9.
- Further details and amendment to the waste strategy are required to address the Waste Strategy Team comments.
- Further highway details are required, including surfacing, gradient and other information, to determine whether the proposed highways are suitable for adoption. This should include updated Swept Path Analysis information for the amended layout.
- Once an acceptable highway layout has been agreed, a Stage 1 Road Safety Audit is required (RSA Brief must be agreed in advance with HDM).
- Further details and improvements to the PROW network are required, including surfacing, width, gradient and other information, which respond to the detailed PROW Team comments that are to be provided.
- Additional visitor parking to be provided within the adopted highway.
- Confirmation that adequate off-street vehicle parking is provided for all dwellings. Further details of cycle parking is also required, including for the apartment units.

Development Overview:

The site is located in the western part of Liversedge and is allocated for residential development in the Local Plan under site reference HS117, which comprises of 3.12ha of land. However, the net site area is reduced to around 2.5ha in order to safeguard the area of woodland (Protected Open Space) in the northern part of the site.

The development proposes 67 dwellings, including 55 no. houses (8 no. 3-bed, 39 no. 4-bed & 8 no. 5-bed units) and 12 no. (2-bed) apartments. Vehicular access to the site is proposed from an extension of Darley Road along the eastern site boundary.

Pre-application advice was provided regarding these proposals (HDM comments included in Appendix B of the supporting Transport Assessment). Some of the issues raised in the pre-application advice have been addressed in the development proposals and supporting information. However, not all issues have been fully addressed, and amendments to the proposals and further information are required, as described later in these comments. The scope of the supporting Transport Assessment was agreed at pre-application stage, and the report has been prepared in accordance with the agreed scope.

Reference to Plans/Documents:

- Transport Assessment (TA) by Vectos, dated March 2023 (v3) that includes a Framework Travel Plan section;
- Drawing VN222468-D100 Rev D – General Arrangement and Forward Visibility Splays (included in TA);
- Drawing VN222468-TR100 Rev D – Swept Path Analysis – 3.5t Panel Van, Large Car and Refuse Vehicle (included in TA);
- Proposed Site Layout drawing - 3416-1-001 Rev V;
- Proposed Materials drawing - 3416-1-100 Rev E.

Policy:

Local Plan Policies – LP3, LP19, LP20, LP21, LP22, LP23, LP24; Kirklees Highway Design Guide SPD, Housebuilder Design SPD, NPPF.

Reference should also be made to the Councils latest 'Waste Management Design Guide for New Developments' document and S38 design guidance documents that provide detailed requirements relating to the highway and development layout. See links below:

<https://www.kirklees.gov.uk/beta/planning-applications/pdf/waste-management-design-guide-new-developments.pdf>

<https://www.kirklees.gov.uk/beta/regeneration-and-development/highways-guidance-and-standards.aspx>

Site Access:

Vehicular access to the site is proposed via an extension to Darley Road, providing a single point of access from the eastern site boundary. Darley Road then connects to the wider highway network via Ripley Road to the south, which connects to the A659 Halifax Road via a priority junction, which includes right turn ghost island markings.

The principle of providing a single point of vehicular access to the development is acceptable. It is noted that as Ripley Road currently serves circa 200 dwellings, the proposed 67 dwellings would increase this to circa 267 dwellings. Therefore, given that a loop road is proposed within the site, no secondary emergency access is considered necessary in this instance, which is in accordance with the advice contained within the Councils Highway Design SPD.

As highlighted by HDM at the pre-application stage, significant levels of on-street parking currently occur on Darley Road/Ripley Road, which may impact on refuse/emergency vehicle access to the site. As such, Section 7 of the supporting Transport Assessment includes 2 no. overnight parking surveys to determine the level and location of on-street parking that occurs. These surveys identified on-street parking currently takes place mainly on Darley Road, with between 32-34 vehicles recorded during the two surveys. Of these parked vehicle, the majority were observed parking partially on footways. Parking was also observed at or close to the Linton Close junction, and to a lesser extent at the Dacre Close junction. Significant levels of double parking were also observed at the bend to the north of the Linton Road junction.

To address the above parking issues, the Transport Assessment suggests that localised double yellow line parking restrictions could be used to prevent obstructive parking, with the TA suggesting that this could include the bend to the north of the Linton Road junction. HDM have discussed this proposal with the Councils Highway Safety Team, who have advised that whilst they would not normally promote parking restrictions on residential estate roads, in this case, localised parking restrictions could be considered. However, they would only support the promotion of the restrictions on the inside of the bend north of Linton Close, and potentially at the Linton Close and Dacre Close junctions, to reduce the risk of obstructive parking in these areas. It is also noted that any parking restrictions proposed would be subject to a separate formal public consultation as part of the necessary Traffic Regulation Order (TRO) process that is required. Therefore, the final extents of any restrictions that may be proposed/approved will not be determined at this stage. The Councils cost to promote and implement the TRO will need to be funded by the development. Therefore, a **£10,000** contribution should be secured by S106 agreement for this purpose.

At the Ripley Road/Halifax Road junction, visibility splays in excess of 2.4x43m are provided in both directions, which are adequate based on the 30mph speed limit. However, it is understood that on-street parking occurs within close proximity to the junction, which can affect the available visibility. This has also been observed by HDM during recent site visits, with 2-3 cars observed parking to the west of the junction in front of the bungalow properties. Whilst on-street parking has been observed near to the junction, this does not appear to have resulted any turning collisions, with no incidents of any type recorded at the junction over the latest 5 year period.

In light of the above, the Councils Highway Safety Team have confirmed that localised double yellow line restrictions could also be promoted within the immediate vicinity of the junction. However, these would be limited to within 10m of the junction to the east and 18.5m to the west (both measured from nearside channel line of minor road). These limited restrictions would ensure that obstructive parking does not occur close to the junction, but would still allow 3 no. on-street parking spaces to be available for residents living in the 3 no. bungalows that do not benefit from drives (parking for these dwellings is available in a parking court, to the east of the Ripley road junction). As previously stated, the necessary TRO would be subject to a separate formal public consultation. Therefore, the final extents of any restrictions that may be proposed/approved will not be determined at this stage. The Councils cost to promote and implement the TRO will again need to be funded by the development. However, these costs would be covered by the S106 contribution previously identified.

As identified at the pre-application stage, to gain access to the site it is necessary to cross public footpath PROW SPE/110/20 that runs along the full extent of the eastern site boundary. However, there appears to be no public vehicle rights over this footpath, and the land occupied by the PROW is not within the development site boundary and appears to be unregistered. Therefore, the applicant was advised to investigate the legalities of ownership and the available rights to convert these sections of PROW to dedicated all-purpose highway to serve the development. As such, it is understood that the applicant has sought advice from the Councils Highway Design and Public Rights of Way teams, to consider the mechanism that could be used to deliver the site access, which is confirmed in Section 5.5 of the Transport Assessment. It is understood that this matter is still be considered by relevant officers, and further comments will be provided to the applicant in due course.

Notwithstanding the above, it is noted that the red line boundary for the development does not include the section of PROW SPE/110/20 between the site and the all-purpose highway on Darley Road. Therefore, the implications of this needs to be considered by planning colleagues, who may determine that changes to the red line boundary are required.

Public Rights of Way (PROW)

There are a number of PROW within the vicinity of the site, including footpaths SPE/110/20 and SPE/116/20 that run along the eastern and southern site boundaries respectively, and Public Bridleway SPE/111/120 on Primrose Lane along the western site boundary. The Spen Valley Greenway also runs along the northern site boundary, which forms part of National Cycle Network Route 66.

The Councils Public Rights of Way team have been consulted regarding the proposals, and their detailed comments are awaited. However, it is understood that they have a number of concerns regarding the proposals, and further information and amendments are likely to be required to the PROW proposals in due course.

Whilst the applicant will need to await the detailed PROW comments, to ensure that all of their concerns are addressed, it is noted that there is very limited detail relating to the required PROW works, with HDM's initial comments as follows:

- A link to Spen Valley Greenway is proposed, as well as links to Bridleway SPE/111/120, which are welcome. However, the paths only appear to be 2m wide, which are inadequate for multi-use routes. Therefore, improvements are required to ensure that they comply with the requirements of LTN 1/20. This must also include information regarding the proposed surfacing and gradients of the routes, to ensure that they are suitable for all users.
- Links to footpath SPE/110/20 are proposed, which are also welcome. However, there are again no details of the width, surface treatment or gradients.
- There is very little level or site sections information available. However, it would appear that new retaining walls may be required adjacent to the PROW, including SPE/116/20 that runs along the southern site boundary (see drawing 3146-1-401 Rev E that shows a new retaining wall adjacent to the footpath). Therefore, details of any new/amended retaining structures need to be clearly identified.
- It is expected that the width and surface treatment of the footpaths that run along the site boundaries will also be improved. This includes sections of SPE/110/20, where the site boundary wall has partially collapsed into the footpath.

Further information and amendments to the PROW proposals are required, which must take into account the comments and requirements of the PROW team once their formal consultation response has been provided.

Site Layout/Servicing/Waste Collection:

The Councils Waste Strategy Team have provided detailed comments regarding the proposals, and these need to be fully addressed. A summary of the key issues that remain outstanding that affect the site layout are as follows:

- The drag distance from Plot 9 to the BCP is approximately 35m, which is in excess of the distance specified in guidance (max 25m). The drag distance from the Bin store to the BCP on the adopted highway is approximately 19m that is in excess 8m (for 240ltr bins). Reversing RCV's is a recognised safety hazard and WISH guidance specifies a maximum reverse distance of 12m. Without provision of a turning head the reverse distance from the loop road to Plot 7 is approximately 35m that is not acceptable.
- Further details of the waste storage for Plots 10-15 and 16-21 is required (addressing all of the other detailed points raised by Waste Strategy).

In addition to the above comments from Waste Strategy, it is noted that the cul-de-sac serving Plots 4-9 is in excess of 20m in length. Therefore, in accordance with West Yorkshire Fire and Rescue advice (and the Councils Highway Design SPD), a turning head must be provided. It is also noted that the maximum hose distance of 45m is exceeded for Plots 8-9.

The following issues have been identified with site layout that need to be addressed:

- Visitor parking has been provided within layby, which is welcome. However, there are only 15 spaces located within the adopted highway (2 more spaces are provided for the private drive serving Plots 7-9, which are welcome, but would not be publicly accessible). Therefore, there is a slight shortfall in visitor parking provision, and the spaces are not evenly spread across the site. There is also likely to be some overspill parking within the site from existing Darley Road residents and their visitors, and additional visitor bays should be provided for this purpose.
- The swept path analysis demonstrates that a refuse vehicle cannot pass a car at the bend adjacent to Plot 63. This bend should be widened to a minimum of 6.1m, and have a centreline radius of at least 20m, to ensure that vehicles can safely pass and obstructions to the refuse vehicle do not occur.
- Adequate junction and forward visibility splays appear to have been demonstrated. However, these splays must be contained within the adopted highway, which will require some amendment to the hard margin/footway widths to accommodate this. These amendments should be made, and the proposed highway boundary and visibility splays clearly marked on this plan.
- The proposed materials plan suggests that the shared surfaces around the loop road will be tarmac, rather than block paving that is as recommended in the Highway Design Guide. Therefore, it is recommended that block paving is provided instead, to highlight the transition in street type and encourage lower traffic speeds. This is particularly important as forward visibility of 17m has been shown around the shared surface loop road, which is only adequate if the 15mph design speed is achieved. Details of all proposed highway surfacing should be shown on an amended plan, which should include the treatment of footways and hard margins (which should also be block paved).
- No highway level details or long section information has been provided. Therefore, it is unclear whether the gradients are acceptable and to an adoptable standard. It is noted that a max. 1:20 gradient is usually required for all adopted streets, and must be no steeper than 1:12 (including on the inside footway on bends). Shared surface street should not be steeper than 1:20. However, if this is not achievable, then consideration may be given to a shared surface street that is slightly steeper than 1:20, subject to the provision of an 2m wide footway being provided.
- The drive for Plot 3 is located at a junction, which is not good practice and will prevent a suitable pedestrian crossing (with tactile paving) being provided at the junction. This drive should be relocated, and the plans should clearly demonstrate suitable pedestrian crossing points throughout the site.
- There is a portion of the HS117 site along the western site boundary that has been excluded from the development, as it is understood to be outside of the applicant control and is not to be developed at this

time. However, consideration of how access to this parcel of land could be accessed if future should to be confirmed.

- To ensure the safety of pedestrians crossing the PROW at the Darley Road access, and ensure slow speeds to/from the development site, some form of speed reducing feature should be proposed (e.g. a raised speed table could be one option).

Once the site layout arrangements have been amended and agreed in principle by HDM, a Stage 1 Road Safety Audit and Designers Response report is required. An RSA Brief must also be agreed with HDM prior to undertaken the RSA.

Highway Adoption Issues:

The internal road layout shall be built to adoptable standards, as set out in the Kirklees 'Highway Design Guide SPD' and 'Highways Guidance Note – Section 38 Agreements for Highway Adoptions' March 2019 (version 1) and associated documents.

As identified at the pre-application stage, sufficient detail is required at the planning stage, to check that the proposed highways are suitable for adoption, and must clearly show the extent of proposed adoption and any areas that are to remain private (e.g. landscaping areas and PoS). However, not all of the necessary information has been provided to date. Therefore, it is reiterated that the following information is required to enable the site layout to be fully considered:

- Long sections, cross-sections and contours;
- Dimensioned plans, including visibility splays and forward visibility sight-lines (with amendments previously identified);
- Kerbing details and surface treatments (with block paving to shared surfaces as previously identified);
- Extent of proposed highway adoption and unadopted communal areas to be confirmed. Details regarding the maintenance of unadopted communal areas/facilities is also required;
- Details of new PROW connections, including confirmation of their status (e.g. footways or multi-use routes), as well as improvements to existing PROW;
- Updated Swept path analysis of revised layout, including the new turning head that is required for the cul-de-sac serving Plot 4-9.
- Any retaining features affecting the highway (including PROW) need to be clearly identified, and sufficient detail provided to ensure that they are suitable in principle.

Development Parking:

The supporting Transport Assessment suggests that off-street parking will be provided for all dwellings, in '*general accordance*' with Council guidance. Further clarity is required to confirm that the provision is in full accordance with Council guidance, which should include a schedule of all plots with bedroom numbers and parking provision confirmed.

A number of dwellings include integral garages. Therefore, clarification is required to confirm that they meet the minimum internal dimensions of 3m x 6m.

All dwellings are to be provided with an electric vehicle charging point, which is acceptable and should be secured by planning condition.

Secure cycle parking should be provided for all dwellings. However, no details have currently been provided. Further information is required, which is particularly important for the apartments, where a large external store may be required. It is noted that the Transport Assessment suggests that cycle parking may be provided with garages. Therefore, if this is proposed, then the garages will need to be enlarged to accommodate this.

As previously stated, additional visitor parking should be provided within the adopted highway. This should provide a minimum of 1:4 spaces per dwelling within laybys, with additional spaces provided close to the site entrance to accommodate any overspill parking from Darley Road residents/visitors.

Road Safety:

The councils Road Safety Team have been consulted regarding the proposals, and they have not identified any significant issues on the local network, other than the on-street parking issues that occur on Darley Road and at the Ripley Road/Halifax Road junction that have been previously mentioned.

The supporting Transport Assessment includes an assessment of personal injury collision data on the local network within the latest 5 year period. This review has confirmed that there have been no recorded incidents on Darley Road, Ripley Road or at the Ripley Road / Halifax Road junction during the search period, which suggests that there aren't any significant issues on the local highway network that need to be addressed, with the exception of the additional double yellow line TRO's that have previously been mentioned that will need to be funded by the development (and subject to a separate consultation process to determine whether they are acceptable).

Accessibility and Travel Plan:

Given the sites location adjacent to Spen Valley Greenway, and the numerous PROW that exist within the immediate vicinity of the site, the site well placed to be accessed on foot and by cycle. However, as previously mentioned, improvements to the proposed pedestrian/cycle links and existing PROW are required to ensure that the opportunities to maximise accessibility by these modes is realised.

The site is within walking distance of bus stops on Halifax Road, which are accessible via continuous footways of adequate width. A pedestrian refuse island is also provided on Halifax Road, circa 90m east of the Ripley Road junction, which will enable access to the westbound stops. There are frequent bus services on Halifax Road, which have been confirmed in the Table 4.1 of the Transport Assessment, which is extracted below.

Service No.	Route	Approximate Frequency (services per hour)					
		Mon – Fri				Sat	Sun
		AM Peak	Midday	PM Peak	Evening		
200	Heckmondwike - Leeds	2	2	2	1	2	1
260	Huddersfield - Cleckheaton	1	1	1	1	1	-
261	Huddersfield – Heckmondwike	1	1	1	-	1	-
268 MAX	Bradford - Wakefield	4	4	4	1	4	2

Table 4.1: Frequency of Bus Services on A649 Halifax Road and A638 Bradford Road

HDM have consulted with WYCA to obtain their views on the proposals, and they have requested that a financial contribution of **£20,000** is sought to provide Realtime Information Displays at the nearest stops on Halifax Road (Stop ID's 15037 and 15038), which should be secured by a S106 agreement.

The supporting Transport Assessment includes provisional information regarding the Travel Plan that will be provided for this site, and confirms that a final Travel Plan will be agreed in due course. This is acceptable, and a final Travel Plan should be secured by condition.

To enable the Travel Plan to be affective, a Sustainable Travel Fund (STF) will be required. Based on the 67 dwellings that are proposed, the STF will be **£34,819.90**, which is based on the current cost of a WY Metro Residential Bus Only MCard cost of £519.70 per plot. It is noted that the STF may be used for a variety of Travel Plan measures that can be agreed in the final Travel Plan, although given the good quality bus services that are available, the MCard scheme may be appropriate for this site, and should form part of the Travel Plan offer.

Kirklees Council requires developers to contribute to the Councils cost of assisting with monitoring and implementing the Travel Plan, with an annual fee charged for the initial five year monitoring period, 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 covers assistance with the development of the Travel Plan and assist the Travel Plan Coordinator 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 via S106 agreement.

Transport Assessment and Traffic Impact

The Transport Assessment includes an assessment of the development traffic impact on the local highway network. This assessment has been undertaken in accordance with the scope agreed at the pre-application stage.

The assessment has demonstrated that the development can be accommodated on the local highway network in capacity terms. This includes no significant adverse impact on capacity at the Ripley Road / Halifax Road junction, which would remain within capacity (Max. RFC of 0.32 on any traffic stream) following the introduction of additional development traffic at this junction.

The trip rates and associated development trip generations that have been included in the assessments, are as follows:

	Trip Rate			Trip Generation		
	Arr	Dep	Total	Arr	Dep	Total
AM Peak	0.145	0.397	0.542	10	27	37
PM Peak	0.374	0.166	0.54	25	11	36

Table 6.2: Proposed Development Trip Rates and Trip Generation

The Transport Assessment concludes *‘the traffic impact of the proposed development cannot reasonably be considered to be severe, and as a result the tests included within the NPPF are not exceeded.’* HDM broadly agrees with this conclusion, and raises no objection to the proposal in relation to traffic impact.

Construction Management Plan

No details have been provided relating to the proposed construction access strategy for this site. This will need to be provided in due course, and a Construction Management Plan (CMP) should be secured by condition. The CMP condition should include specific requirement for construction access arrangements, HGV turning and loading arrangements, contractor parking, as well as adequate wheel washing and street cleansing facilities. It is noted the Temporary Traffic Regulation Orders (TTRO) may also be required on Darley Road and Ripley Road during the construction period.

In addition to the CMP, highway conditions surveys (including PROW) must be undertaken in advance of work commencing on site, with any remedial works required both during and post construction implemented by the development. The necessary conditions surveys must be undertaken jointly with the Local Highway Authority, and should be secured by planning condition.

Planning Conditions/Section 106:

Conditions and informatives:

- To be advised

Section 106 Contributions/Requirements;

- TRO Contribution for Darley Road & Ripley Road / Halifax Road junction - **£10,000**
- Provision of 2 No. Real Time Information displays (Stop ID's 15037 and 15038) - **£20,000**;
- Sustainable Transport Fund (STF) **£34,819.90** (based on 67 dwellings)
- Travel Plan Monitoring Fee - **£10,000** (£2,000 x 5yrs).

Conclusion:

Further information and amendments required, see recommendation box.