

Consultation Response from KC, Highways Development Management (HDM)

2023/91212 Land off Bankfield Drive, Holmebridge, Holmfirth, HD9 2PH

Erection of 16 dwellings with access from Laithe Avenue

Date Responded: 19/06/23 | **Responding Officer:** A.Darwin | **Responding Ref:** HDC 3-26/3

RECOMMENDATION:

Further information and amendments required.

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

- Amendments to the site layout and visitor parking provision is required;
- Additional information regarding the proposed estate roads and private drives is required, including long sections, levels, contour information, surface treatments, kerbing, drainage and highway retaining structures;
- Once the development layout has been agreed in principle, a Stage 1 Road Safety Audit and Designers Response is required (RSA Brief to be agreed in advance);
- Further details of proposed garages and cycle parking provision is required;
- Off-site improvements are required to mitigate the impact of the development on the local highway network, particularly at the Bankfield Drive & Laithe Bank Drive junctions with Dobb Top Road.
- More detailed consideration of the site accessibility for pedestrians and cyclists is required, with improvement works proposed where required.
- Further consideration of the traffic impact of the development is required, with particular attention given to the impact of traffic on pedestrians within the local shared space streets.

Development Overview:

The site is located in Holmebridge to the south of the village centre, and is proposed to be accessed via Laithe Avenue, which is an existing residential estate road. The site is allocated for residential development in the Local Plan, with site reference HS183 that has an indicative capacity of 23 dwellings.

Immediately to the west of the site is further 'safeguarded land' designated in the Local Plan, which may be accessed in future via the HS183 site. As such, in accordance with Local Plan Policy LP6, the proposals must not prejudice the possibility of long term development of the safeguarded land. This requirement has been accommodated within the site layout, with the extended section of Laithe Avenue passing through the site and connecting to the sites western boundary with the safeguarded land. However, the shared road between plots 10-12 should also be extended to the site boundary to allow for a further potential future connection to this land.

The proposed development includes 16 No. dwellings, which includes 10 no. 3-bedroom dwellings and 5 no. 4-bedroom dwellings and 1 no. 5-bedroom dwelling.

Reference to Plans/Documents:

- S104 Drainage Layout Plan – 21042-101C
- Detailed Landscape Proposals – H2-230201-1-C
- Proposed Site Plan - 2021.01.003-N
- Transport Statement report by Optima Highways dated March 2023 (Rev. 3)

Policy:

Local Plan Policies – LP5, LP6, LP19, LP20, LP21, LP22, LP23, LP24; Kirklees Highway Design Guide SPD, Housebuilder Design SPD and the NPPF.

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

Site Access:

Access to the site is to be gained via Laithe Avenue, which links to Dobb Top Road/Smithy Lane to the north via Bankfield Drive and Laithe Bank Drive, which are both residential estate roads that are c.5.5m wide with c.1.8m wide footways and street lighting.

On the approach to the Dobb Top Road/Smithy Lane junctions, both Bankfield Drive and Laithe Bank Drive have steep downhill gradients (circa 1:6-1:7). At the Bankfield Drive/Dobb Top Road/Smithy Lane junction, there is also restricted visibility to the west along Smithy Lane, and Dobb Top Road forms a further junction on the west side of the Bankfield Drive minor arm in the large bellmouth area.

To provide access to the site, it is proposed to extend Laithe Avenue to the west as a Local Residential Street (Type 2), with footways on both sides for the initial section that connects to the safeguarded land to the west. A shared space street is then provided to the north of the extended section of Laithe Avenue, which serves the remainder of the site. These arrangements are acceptable in principle. However, as previously stated, the shared surface street between Plots 10-12 should also be extended to the site boundary to allow for a further future link to the safeguarded land.

Site Layout/Servicing/Waste Collection:

Whilst the general principle of the site layout is acceptable, the following issues need to be addressed to confirm whether an adoptable highway layout can be achieved:

- No level information has been provided, to confirm whether highway gradients and drainage proposals are acceptable and this must be provided. It is noted that in accordance with the Councils Highway Design Guide SPD, a maximum highway gradient of 1:20 should be provided. However, if it can be clearly demonstrated that this is not feasible, which may be the case given the sites topography, gradients of up to 1:12 could be considered for the Local Residential Street (Type 2) section. Should the shared space streets have a gradient in excess of 1:20, a separate 2m wide pedestrian route is required, which has not currently been provided.
- The plans do not show any highway dimensions, so it is not possible to confirm if the layout meets the Councils adoption standards, and this must be provided.
- Whilst no highway dimensions have been provided, it appears that 4m junction radii have been provided at the internal junction. Whilst this may be acceptable, no Swept Path Analysis has been provided to confirm that the Councils design refuse vehicle can safely turn at this junction.
- Trees are proposed in proximity to the adoptable carriageway corridor. Details of root barrier systems need to be provided for consideration to ensure current proposals remain adoptable. There are also two trees proposed adjacent to the Plot 13 and 14 that are in close proximity to an existing retaining wall fronting Dobb Top Road, which is of concern. These trees should be relocated, or details provided how these could be provided without impacting on the safety of the retaining wall.
- The Councils Waste Strategy Team have provided detailed comments regarding bin store locations etc. and these comments should be taken into account in a revised layout.
- Swept path analysis has been provided to confirm that the Councils design refuse vehicle can turn within the proposed turning head between Plots 10-12. However, should any vehicles park within this turning head, this would prevent the refuse vehicle from turning within the site, resulting in long reversing manoeuvres. Therefore, measures to ensure the turning head will not be blocked are required (e.g. additional visitor park laybys).
- No transition ramp has been shown between the Type 2 street and the shared surface, which must be incorporated (See S38 standard details for further information).
- The visitor parking layby proposed adjacent to Plot 2 is very close to the private drive. This could result in the visitor parking blocking turning movements and visibility to/from the private drive. The location of the

visitor parking bay should be amended to address this issue. The size of all of the visitor parking bays also needs to be confirmed, as they do not appear to meet the minimum standards of 2.4x6m (2.0x6m where there is an adjacent footway).

- The extent of the proposed adopted highway has not been indicated on the plans. Therefore, this must be confirmed on the submission drawings, with all junction and forward visibility requirements incorporated into the adopted highway. The extent of shared private drives should also be identified, as well as confirmation of how future maintenance will be secured.
- A turning head for light vans is proposed for the private drive serving plots 13 & 14, which is welcomed. However, the turning head is located in close proximity to the existing retaining wall fronting Dobb Top Road. Therefore, confirmation is required that the existing retaining wall can take this vehicle loading, and what if any works are proposed to this retaining wall (it is assumed it will be partially reconstructed, to allow the new site drainage to be installed?).

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 stated in the HDM pre-application comments, sufficient detail must be provided to confirm that the streets are suitable for adoption, and should 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 required information has been provided, which is reiterated as follows:

- Long sections, cross-sections and contours;
- Dimensioned plans, including visibility splays and forward visibility sight-lines;
- Kerbing details and surface treatments;
- Extent of proposed adoption and unadopted communal areas to be confirmed. Details regarding the maintenance of unadopted communal areas/facilities are also required.
- Swept path analysis of the entire highway layout, including all junctions.
- Details of any new highway retaining walls, and consideration of the development impact on any existing retaining walls within the vicinity of the highway (e.g. the retaining wall on Dobb Top Road).

Once the development layout has been agreed in principle, a Stage 1 Road Safety Audit and Designers Response is required (RSA Brief to be agreed in advance).

Parking:

It is understood that all dwellings will be provided with off-street parking in line with the Councils Highway Design Guide SPD, which recommends that 2 spaces are provided for 2-3 bed dwellings and 3 spaces for 4+ bedroom dwellings.

However, to achieve the required parking provision most of the dwellings included garages. Whilst the size of the garages appears to be adequate, the submission plans do not confirm whether their internal dimensions meet the Councils minimum standards of 3m x 6m, which must be confirmed or amended accordingly.

The proposals include 5 no. visitor parking bays, which include 3 laybys in the proposed adoptable highway and 2 no. bays located in the private drive serving plots 13 & 14. Whilst the visitor bays in the private drive are welcomed, they will not be available for public use. Therefore, there is a shortfall of visitor parking for the 14 No. units served by the adoptable roads of 1 space (a minimum of 1 per 4 units is required), which should be incorporated into the layout as a minimum.

As previously stated, there is concern about the lack of visitor parking within the turning head between plots 10-12, the location of the layby adjacent to plot 2 and the size of the laybys being generally too small, and these points should be addressed in a revised layout.

All dwellings are proposed to include 1 no. electric vehicle charging point, which should be secured by condition. Secure cycle parking is also required for all dwellings and should allow for electric cycle charging. Should cycle parking be proposed within garages, these will need to be enlarged to accommodate this.

PROW:

PROW footpath HOL/91/20 runs along the southern boundary of the site, and it is proposed to provide a 2.5m wide link to the PROW from the site access road. This link is welcomed and is acceptable, and it's provision must be secured by a suitable worded planning condition.

Road Safety:

At the pre-application stage, a number of safety issues were identified by HDM on the local network, and the applicant was requested to investigate these matters further, and propose a package of highway measures to address these issues. However, in the supporting Transport Statement, the transport consultant has provided responses to the concerns raised, and have concluded that *'no off-site highway improvements are necessary.'*

HDM do not agree with these findings and provide further comments on these matters below. For ease of reference, the original HDM pre-applications comments, Transport Statement response and further HDM comments are provided for each issue as set out below:

Junction Visibility at Bankfield Drive

HDM Pre-applications comments:

'...there is restricted junction visibility looking to the west from the Bankfield Drive junction on to Smithy Lane. Therefore, speed data should be obtained on Smithy Lane on approach to the junction, to confirm the visibility requirements. Consideration should then be given to improving the junction arrangements to maximise junction visibility. This may be possible by making the junction more compact (subject to Swept Path Analysis), encouraging drivers on Bankfield Drive to wait closer to the central lane markings, which will improve the available sight line to the west. Amendments to the boundary wall on the south side of Smithy Lane to the west of the junction should also be investigated to improve visibility.'

Transport Statement response:

'5.5.3 KC state in their pre-app response that there is restricted junction visibility to the west from Bankfield Drive to Smithy Lane and consideration should be given to improving the junction arrangements, such as encouraging drivers on Bankfield Drive to wait closer to the centre line marking at the give-way.'

5.5.4 It is acknowledged that there is some restriction to visibility to the west due to the presence of the retaining wall, however, it is concluded that no changes to the junction are required for the following key reasons:

- From the site visit, which included driving various routes, vehicle speeds on the Smithy Lane/Dobb Top Road corridor are observed to be fairly low, between circa 15 and 20mph.*
- The low vehicle speeds reflect the geometry, alignment and nature of Smithy Lane and Dobb Top Road. These factors all contribute to influence driver behaviour and lead to a reduction in speed;*
- Advice and research in both Manual for Streets and MfS2 confirms that reduced visibility plays result in reduced vehicle speeds and more cautious and careful driving;*
- The accident data confirms that no incidents have occurred at the Bankfield Drive/Dobb Top Road junction over the most recent five year period which confirms that there are no highway safety concerns at this junction;*
- The development proposals add very few additional trips to this junction and will therefore have no material impact in either capacity or safety terms. Kirklees Council already acknowledge and agree in their pre-application response that due to the low development trips no capacity assessment is required; and*

- *Kirklees Council commented that the Bankfield Drive/Dobb Top Road junction could potentially be made more compact to encourage drivers to wait closer to the central lane markings. It has been observed during the site visit that vehicles turning left from Bankfield Drive do already tend to sit closer to the road centre line.*

5.5.5 In summary, the evidence confirms that there are no existing highway safety concerns at the Bankfield Drive/Dobb Top Road junction and the development proposals do not have a material impact and will not change this. It is therefore concluded that no improvements are required to the existing visibility or layout at the junction.'

HDM Response to Transport Statement comments:

- No empirical data has been provided to confirm whether traffic speeds are 'fairly low' or between 15-20mph as has been suggested. Therefore, as previously requested by HDM, speed data is required to confirm the visibility requirements at this junction.
- Notwithstanding the above, assuming speeds are 20mph as has been suggested, this would require visibility splays of 2.4x25m. Whilst the Transport Statement has not clarified the available visibility at the junction, the above splays are clearly not achieved, with HDM estimating that the splay to the west is circa 2.4x16m at best. Therefore, the visibility splay is sub-standard and improvements are required.
- Whilst no personal injury accidents have been identified at this junction, this does not mean that no incidents have occurred, as damage only incidents are not recorded within this data. Therefore, the lack of any incident record does not mean there are no safety issues to address.
- Bankfield Drive and Laithe Bank Drive currently serve circa 53 dwellings. Therefore, the additional 16 dwellings that are proposed to be served by these roads, is likely to increase the use of these roads by 30% or more. Furthermore, given the location of the site, the majority of the vehicle trips may choose to use Bankfield Drive, which is the most direct route to/from the site, and is likely to make the proportionate increase in traffic on this road substantially more than 30%. Therefore, HDM do not agree that this level of increase is immaterial, and this additional traffic could materially increase the risk of turning collisions at the junction. This is of particular concern given that Smithy Place is a shared space highway and a designated signed rural school route.

In light of the above, HDM reiterate that improvements to junction visibility are required at this junction.

Steep Downhill Slope from Bankfield Drive and Wall Damage

HDM Pre-applications comments:

'The steep downhill approaches to Smithy Lane/Dobb Top Road from Bankfield Drive and Laithe Bank Drive are likely to result in high approach speeds and could result in junction overshoot type incidents, particularly in wet/icy conditions. Therefore, measures to reduce approach speeds should be investigated on approach to both junctions, which could include ramp type features (e.g. similar to those provided at the start of shared space type streets).

There is also evidence that the wall on the north side of Dobb Top Lane/Smithy Lane opposite the Bankfield Drive and Laithe Bank Drive junctions may have been struck by vehicles (either passing traffic or from the side roads), resulting in damage to the walls. HDM have consulted with the Councils Highway Structures team about this matter, who have advised that rain water that runs along and through boundary walls of this type (with no kerb or drainage channel), causes maintenance issues as fill material is washed from the wall, reducing it's strength over time. Therefore, whilst no additional vehicle restraint feature appears suitable in this location, measures should be investigated to address the drainage issue adjacent to the wall. This could involve the creation a 450-600mm wide hard margin with full height kerb to direct water to the drainage gully instead of through the wall.

Transport Statement response:

5.5.6 KC state that the steep downhill slope from Bankfield Drive and Laithe Bank Drive could potentially result in high approach speeds and overshooting of vehicles, particularly in wet and icy conditions. KC requested that consideration be given to potential remedial measures such as ramp type features.

5.5.7 It is acknowledged that there are existing downhill slopes from both Bankfield Drive and Laithe Bank Drive, however, it is concluded that no changes are required for the following key reasons:

- *Onsite observations reveal that the few vehicle movements from both roads towards Dobb Top Road are undertaken with care and drivers safely come to a halt at the give way road markings with no issues;*
- *Bankfield Drive has a bend on its approach to Dobb Top Road which naturally reduces vehicle speeds further. This was also observed on the site visit with vehicles approaching the junction at low speeds;*
- *There are no visible tyre skid marks on the carriageway and there are no recent signs of damage to the existing stone walls located on Dobb Top Road. This suggests no vehicle overshooting occurs at either approach from Bankfield Drive or Laithe Bank Drive;*
- *The onsite observations (such as no road skid marks, and no damage to any walls) align with the Council's recorded accident data which shows that no collisions have taken place at this location within the last five years, including during the colder winter months when snow/icy conditions can prevail;*
- *The development proposals add very few additional trips to this junction and will therefore have no material impact in either capacity or safety terms. Kirklees Council already acknowledge and agree in their pre-application response that due to the low development trips no capacity assessment is required; and*
- *It is observed that grit salt bins have been provided (and recently filled) in close proximity to Bankfield Drive and Laithe Bank Drive. Use of these will reduce the likelihood of skidding during poor conditions and assist in preventing any potential collisions.*

5.5.8 In summary, the evidence confirms that there are no existing highway safety concerns relating to the approaches from both Bankfield Drive and Laithe Bank Drive to Dobb Top Road. The development proposals do not have a material impact and it is therefore concluded that no improvements are required.

5.5.9 Any concerns KC may have regarding the approach gradients during wet/icy conditions is clearly an existing maintenance matter which is the responsibility of the Council. Grit bins are already provided for such occasions.

HDM Response to Transport Statement comments:

- Whilst there have been no recorded personal injury incidents relating to junction overshoots at these junctions, there is clear evidence of this from the damage that has been caused to the walls opposite the junctions. Following further investigation with the Councils highway maintenance team and their customer report records from ROSS, there appears to have been 4-5 incidents since 2015 where there has been significant damage to the walls from vehicle collisions, with a number of these incidents involving vehicle skidding on exit from Bankfield Drive and Laithe Bank Drive. Therefore, the comments that drivers safely halt at the give-way line and no skidding occurs is clearly not the case.
- As previously stated, the development is likely to increase traffic at these junctions by at least 30% or more, which is considered to be a material increase. Therefore, this will increase the risk of further junction overshoot incidents and collisions with the highway wall opposite.
- Whilst the bend in Bankfield Drive does help to reduce traffic speeds away from the junction, this would not significantly constrain the speed of traffic on approach to the junction. Furthermore, due to the gradient of these roads and the lack of level sections at the junctions, this increases the risk of overshoot incidents occurring, which may be most likely by non-residents who are not as familiar with the road alignment (e.g. home delivery vehicles, who were responsible for at least one of the previous wall collisions).

In light of the above, HDM reiterate that improvements are required to address the junction overshoot / wall collision incidents. As such, HDM have discussed this matter further with the Councils Highway Structures Team, who have agreed that a 325mm height containment kerb (Safety Kerb Type TK2 – See S238/S278 standard details) could be installed opposite the junctions, to reduce the risk of an errant vehicle from colliding the wall. Whilst this would not address the issue of overshoot incidents directly, it would reduce the risk of an opening in

the wall being created that could be hazardous to pedestrians (e.g. school children on this rural school route), thereby reducing the severity of such incidents. However, the Councils Road Team have highlighted that any proposal should not adversely affect pedestrian safety along this shared surface route, which would need to be taken into account in the design (e.g. sections of footway and/or step of locations may be required, as well as improved signage and road markings). Any proposed works would also need to ensure adequate drainage of the highway, with water directed to gullies and not through the wall.

In addition to measures to protect the highway boundary wall from vehicle strikes, measures to reduce the risk of overshoot/skidding issues should be provided on approach to the junction. This could include ramp type features as previously suggested, or other measures such as higher friction surfacing on approach to the junctions.

Footway improvements on Bankfield Drive and Laithe Bank Drive

HDM Pre-applications comments:

The footway surfaces on the steep sections of both Bankfield Drive and Laithe Bank Drive are currently overgrown by moss, which is likely to be slippery in wet conditions. Therefore, improvements to the footways surfacing should be investigated specifically in these areas, as well as along the full footway routes to the site.

Transport Statement response:

*'5.5.10 KC state that the footway surfaces on the steep sections of both Bankfield Drive and Laithe Bank Drive are currently overgrown with moss which is likely to be slippery in wet conditions.
5.5.11 Some moss was observed on the footways on Bankfield Drive and Laithe Bank Drive but this is clearly an existing maintenance issue for KC to resolve. This area of highway is 'maintainable at public expense' and it is the responsibility of the Council to treat the footways and ensure they are kept clean from moss.'*

HDM Response to Transport Statement comments:

Whilst it is agreed that the Highway Authority have a duty to maintain the highway, this does not extend to ensuring the highway is kept clear of moss as has been suggested, which would be impractical.

Therefore, it is disappointing that the applicant is unwilling to consider improvements to the footways, which would make them more attractive to users and promote walking to/from the development, in line with local and national policy to encourage sustainable forms of transport such as walking.

Access to Wider Network

HDM Pre-applications comments:

'Access to the wider highway network (e.g. the A6024 Woodhead Road) is via Dobb Top Road and Bank Lane to the west, and Dobb Top Road, Dobb Lane, Ford Gate and Co-op Lane to the east. These lanes are relatively narrow, have no footway provision and are a bus route. 'Rural School Route' signage on yellow backing boards are currently provided on this route to highlight the presence of pedestrians within the shared carriageway. Consideration should be given to whether any additional improvements could be provided to mitigate the impact of additional development traffic along these routes. To consider this matter further, speed and traffic flow data should be obtained along these routes, together with vehicle turning count data at the Bankfield Drive and Laithe Bank Drive junctions to consider the likely traffic distribution to/from the development site.'

Transport Statement response:

'5.5.12 KC state that access to the wider highway network is via Dobb Top Road and Bank Lane to the west and Dobb Top Road, Dobb Lane, Ford Gate and Co-op Lane to the east. KC also state that consideration should be given to whether any additional improvements could be provided to mitigate the impact of additional development traffic along these routes.'

5.5.13 *It is concluded that no improvements on these roads are required for the following key reasons:*

- *The development proposals add very few additional trips to the local highway network and will therefore have no material impact in either capacity or safety terms. Kirklees Council already acknowledge and agree in their pre-application response that due to the low development trips no capacity assessments of the local highway network is required;*
- *The distribution exercise undertaken in this chapter highlights that the majority of vehicles turn left from Bankfield Drive, onto Smithy Lane before then heading east along Woodhead Road. Only 11% of trips are predicted to turn right out of Bankfield Drive and travel along Dobb Top Road. In summary the low number of trips generated by the development reduce even further as they dilute across the local highway network and as such they have no material impact on the operation or safety of the local highway network;*
- *The accident data confirms that no incidents have occurred across the wider local highway network for the most recent five year period which confirms that there are no highway safety concerns; and*
- *Existing 'Rural School Route' signage is already displayed along both Dobb Top Lane and Smithy Lane which alerts drivers to the potential of pedestrians walking on the carriageway.*

5.5.14 *In summary, the evidence confirms that there are no existing highway safety concerns in the local area that would justify additional wider network improvements. The development proposals do not have a material impact and it is therefore concluded that no improvements are required.'*

HDM Response to Transport Statement comments:

- The requirement to undertake junction capacity assessment is not related to the need to review highway safety matters and is thus irrelevant.
- No data has been provided to confirm the current use of the local highway network or existing traffic speeds. Therefore, it is unclear how the Transport consultant can conclude that there would be no material impact.
- Whilst the Transport Statement does include a census based traffic distribution based on method of travel to work data, there are no details on how this has been used to route traffic on the local network. Based on the information provided, it appears that the vast majority of traffic that has been identified heading east on Woodhead Road has been assumed to travel via Smithy Lane rather than Dobb Lane. However, in practice more traffic may choose to use Dobb Lane at peak times, to avoid congestion issues on Woodhead Road. Therefore, the traffic distribution that has been presented is not considered to be reliable.
- As previously stated, whilst no personal injury accidents have been identified in the local area, this does not mean that no incidents (or near misses) have occurred. Therefore, the lack of any incident records does not mean there are no safety issues to consider.
- Whilst existing pedestrian warning signs are provided on the local network, consideration should be given to whether these are adequate or whether additional measures are required to mitigate the impact of additional traffic on these routes, and to allow them to safely accommodate the additional pedestrian and cycle movements from the development.

In summary, HDM cannot currently support the proposals due to the increase in safety risk of additional development traffic on the local network, which has not been thoroughly assessed or mitigated to an acceptable degree; and as appropriate opportunities to promote sustainable transport have not taken up. Therefore, the proposals are considered to be contrary to paragraph 110 of the NPPF and LP20 & LP21 of the Kirklees Local Plan.

Accessibility:

The supporting Transport Statement includes a high level review of the sites accessibility by non-car modes. This has confirmed that site is accessible by public transport, with relatively frequent hourly services available within walking distance of the site on Woodhead Road (circa 400m walk from the site).

However, the Transport Statement only provides a cursory review of the pedestrian facilities on the local network, and does not propose any measures to encourage this form of transport. Therefore, as requested at the pre-application stage, the applicant should investigate whether improvements on the local network are required,

which could include the measures previously suggested within the vicinity of the Bankfield Drive and Laithe Bank Drive junctions with Dobb Top Road.

Traffic Impact/Network Assessment:

The following comments are noted regarding the traffic impact assessment included within the Transport Statement:

- The TRICS database has been utilised to determine the likely traffic generations for the development. Whilst this approach is acceptable in principle, the TRICS data does not appear to be representative of this site. As can be seen from the TRICS output, a large number of the sites that have used are for terrace housing, bungalows and semi-detached dwellings, which is not representative of the proposal site that only includes large detached dwellings with 3+ bedrooms. The data selection parameters also do not appear to take into account other local factors, including car ownership levels, public transport accessibility etc.
- Multi-modal trip distribution has been determined by applying local census data mode split assumptions to the TRICS vehicle trip generation data, which is considered to be a flawed approach. If census data is to be used for modal split purposes, this should be applied to the total person trip data and not to the vehicle trip data.
- Traffic distribution has been based on method of traffic to work data from the census. Whilst this approach is often used, it does not take into account non-work trips, and also does not confirm which routes will be used to access the wider network. This approach is also contrary to that suggested by HDM at the pre-application stage, where it was requested that turning count data from the existing Bankfield Drive and Laithe Bank Drive junctions with Dobb Top Road should be used to inform the assessment (this data could also have been used to validate any trip rate assumptions).
- No traffic (volume and speeds) or pedestrian data has been obtained on Dobb Top Road / Smithy Lane to determine the existing use of these routes by all modes. Therefore, it is not possible to determine whether the impact on these routes is acceptable, or whether mitigation is required. This is particularly important as these routes are shared surfaces, and the interaction between pedestrians, cyclists and motor vehicle traffic needs to be considered.

In light of the above, further supporting information is required to allow the impact of the development on the local network to be fully considered.

Planning Conditions/Section 106:

Conditions;

- To be advised

Section 106 Contributions/Requirements;

- To be advised

Conclusion:

Further information required, see recommendation.