

**Consultation Response from KC, Highways Development Management (HDM)**

**2023/91491 Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU**

**Erection of 61 age-restricted apartments with ancillary accommodation including separate residents lounge and manager facilities and associated external works, including the erection of access bridge and riverside walk featuring two pedestrian bridges (within a Conservation Area).**

**Date Responded: 28/07/23**

**Responding Officer: A Darwin**

**Responding Ref: K3-36/23**

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

- Further details / amendments to the site access arrangements and relocated visitor parking bays, including a Stage 1 Road Safety Audit (with RSA Brief agreed in advance with HDM) and Designers Response.
- Further details of the emergency and active travel access arrangements via Woodhead Road, including access rights for other users (e.g. the existing plumbing business).
- Further details and consideration of fire fighting arrangements, including swept path analysis of high reach appliances.
- Further details regarding the waste strategy, and refuse vehicle turning/loading arrangements.
- Improvements to the surface parking arrangements, and route/design of the Riverside Walk, including the provision of a public route from Woodhead Road.
- Further details and amendments to the basement car parking layout.
- Further details relating to car park management, including identification of visitor parking spaces and EV charging provision, and parking management measures.
- Improved facilities for cycle storage.

**Development Overview:**

This application seeks approval of 61 (59 x 2 bed and 2 x 3 bed) age-restricted apartments (55 and over) with ancillary accommodation including separate residents lounge, manager facilities and associated external works, including the erection of access bridge and riverside walk featuring two pedestrian bridges (within a Conservation Area), at the former Prickleden Mills site, Woodhead Road, Holmfirth. The application site is located straddling the River Holme, approximately 450 metres to the west of Holmfirth Town centre.

This application comprises a revised apartment scheme to that approved in December 2013 (Ref: 2012/90738), with a later variation approved in January 2018 (Ref: 2018/90031), both of which were for 46 age restricted apartments. A similar application for 61 age-restricted apartments (Ref: 2021/92003) was refused on 22/06/22.

This application is supported by a Transport Statement (TS) prepared by Paragon Highway Consultants dated May 2023, which considers a number of issues including parking, access and traffic generation.

**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 layouts. 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>

**Vehicular Access:**

Main vehicular access via Lower Mill Lane

The main vehicular access to the site is proposed via Lower Mill Lane. To create the new site access, it is proposed to relocate 4 no. visitor parking bays from the end of Lower Mill Lane to the initial section of access road. However, the information provided does not clearly indicate the changes proposed to the highway, or the proposed extent of the highway boundary. Therefore, further detail of the proposed highway works are required, with the following design comments noted:

- It is envisaged that the highway boundary is proposed to be amended to include the relocated visitor parking bays and not the remainder of the site access roads. However, this should be clarified on detailed highway works plan, with the highway boundary clearly delineated in the design. A transition ramp at the highway boundary may also be beneficial, which would help delineate the highway boundary and ensure slow speeds to/from the site.
- 0.6m wide margins are required to the rear of the relocated public visitor parking spaces and included in the highway boundary. A 0.6m margin should also be provided to the side of the last public parking bay, which will help to delineate these spaces from the private on-site parking.
- Amendments to the boundary fencing adjacent to the visitor parking will be required, as well as new/amended street lighting.
- The parking aisle width must be a minimum of 6m adjacent to all parking bays to allow for manoeuvring to/from bays. No waiting restrictions (Double Yellow Lines) will also be required opposite the visitor parking bays, with the necessary TRO changes clearly annotated on the proposal plans.
- A min. 2m wide footway is required along the Riverside Walk route (the current proposals do not appear to provide this in some places). Safety fencing is also required adjacent to the river, which is of appropriate design for the conservation area setting.
- The drainage proposals should be confirmed, which need to be designed to ensure that surface water from the site does not drain into the public highway.

Once the site access layout and riverside walk route has been agreed in principle, a Stage 1 Road Safety Audit and Designers Response report is required. An RSA Brief must also be agreed with HDM prior to undertaking the RSA.

Emergency Access

The Transport Statement and supporting drawings suggest that there may be an emergency access to Woodhead Road, and this access may also be utilising by the existing plumbing business that is served by this access road. However, it is unclear how this emergency access would operate and be controlled (e.g. previous applications showed this access with lockable bollards). Therefore, further details are required of this emergency access route, as well as details of the proposed access rights (including vehicle types) and access controls. Adequate access and turning facilities also need to be maintained for the plumbing business, which need to be clearly identified, and tested with swept path analysis.

No details of the proposed fire fighting arrangement for the development have been confirmed. However, due to the height of the proposed buildings, it is anticipated that high reach appliances will need to be accommodated. Therefore, further details of the proposed fire fighting arrangements should be provided, including swept path analysis of high reach appliances; and confirmation that the arrangements are in accordance with West Yorkshire Fire and Rescue Service standards, or as otherwise agreed.

Refuse Collection

The Transport Statement and application form suggests that private waste collection is proposed; and the swept path analysis provided suggests that the refuse vehicle would turn at the bridge and would not enter further into the site. However, other than this, there is very little information to confirm how refuse collection is anticipated to take place, and how it would be managed in a safe and efficient manner.

The Councils Waste Strategy Team have also highlighted a number of concerns regarding the waste strategy, including the small size of the waste stores, which are likely to require frequent collections, and the excessive bin carry distances for residents and collection staff. Therefore, a detailed waste strategy needs to be proposed, which addresses all of the concerns raised.

It is also noted that the swept path analysis (SPA) provided for the refuse vehicle is extremely tight, with little or no clearance from kerb edges. This is of particular concern due to the lack of a hard margin on the south side of the proposed bridge, which could result in a refuse vehicle colliding with the bridge parapet and also the adjacent car parking bays. Therefore, the SPA and site layout should be reviewed, to ensure safe turning can take place in a location that is suitable to accommodate the agreed waste strategy.

**Parking:**

Car Parking

Based on the scale of development proposed, the following car parking provision is required based on guidance contained in the Councils Highway Design SPD:

- 1 space per dwelling for the 59 no. 2 bedroom apartments = 59 spaces;
- 2 spaces per dwelling for the 2 no. 3 bedroom apartments = 4 spaces;
- Visitor parking at 1 space per 4 dwellings = 15 spaces;

Therefore, a total of 78 car parking spaces are required for the development, plus the 4 additional replacement visitor parking spaces at the end of Lower Mill Lane.

The development proposes the following car parking provision:

- 4 replacement visitor parking spaces at the end of Lower Mill Lane;
- 22 surface parking spaces on south side of river (spaces P1-P22);
- 9 surface parking spaces on north side of river (spaces P23-P31);
- 47 basement parking spaces (spaces P32-P78).

The drawings also show that 14 of the basement parking spaces will be marked as 'disabled' bays (18%), and the planning statement confirms that each apartment will be provided with EV charging facilities.

In light of the above, the level of car parking provision that has now been identified is acceptable. However, there are a number of issues that need to be addressed as follows:

- There are a number of what appear to be columns in the basement car park that would affect safe turning to/from the bays. Therefore, this needs to be clarified, with the columns relocated where necessary (subject to swept path analysis).
- It is also noted that if these are columns in the basement, they also appear to impact on the use of the proposed disabled/accessible parking bays, with side access being blocked by the columns. Clear 1.2m wide transfer zones are normally required for this purpose, which are missing from the current layout and should be incorporated.
- The parking aisles adjacent to any parking bay must be a minimum of 6m to allow for turning to/from the spaces. This is not available for all spaces, including P19-P22 & P36, and the layout needs to be amended accordingly.
- At the end of parking aisles, it is usual to extend the aisle beyond the last space to enable ease of access. This has not been provided for the basement and surface car parks. Therefore, this should be incorporated, or swept path analysis provided to confirm that a large car can access these spaces. Alternatively, the last bays in the aisle could be widened instead.

- The location and management of the developments visitor parking bays has not been identified. Therefore, the location of these bays should be confirmed, as well as measures to ensure that the spaces are not abused by residents or other unauthorised users.
- The planning statement confirms that one EV charging point will be provided per apartment. The location of these spaces should be confirmed. This is particularly important for the charging facilities that will be required to the south of the river, as there appears to be limited scope to locate the necessary charging equipment for some of the proposed spaces.

### Cycle Parking

Cycle parking is proposed in individual self-storage units for each apartment, accessed from the basement car park. This level of provision is acceptable. However, the design of the facilities appears to be impractical for the following reasons:

- Some of the storage units are less than 1.6m deep that would not accommodate a standard bicycle.
- The access routes to storage units are very narrow, with multiple bends and doors that will be difficult to navigate, particularly for less able bodied cyclists.
- To access the storage units, cyclists would need to tilt their bike on end due to the narrow corridor widths. This will be particularly difficult for less able bodied cyclists, and those using heavier (e.g. electric) and more cumbersome non-standard cycles.

In light of the above, the cycle parking provision should be improved, and should incorporate provision for non-standard bikes, such as three-wheelers, tandems, recumbents and other “non-standard” cycles (LTN 1/20 recommends a provision of 5% for non-standard cycles). One option that could be considered is providing larger shared cycle parking stores within the basement, which would provide a higher quality provision. For information, a store that is circa 6x8m (with 2.7m headroom) could provide sufficient space for 61+ cycles if two-tier racks were utilised (See 11.4.9 of LTN 1/20 for more information on suitable parking options), which would easily fit in the available space.

### Accessibility

Further comments are required from the Councils Public Rights of Way (PROW) Team in relation to the proposed route and design of the Riverside Walk, which is an extremely important link, and one of the key features of the development. However, in the interim, HDM have reviewed the proposals and initial comments relating to the site accessibility is provided below.

Pedestrian and cycle access is proposed via Lower Mill Lane and Woodhead Road, and a new section of Riverside Walk is proposed, including 2 new footbridges. These access arrangements are similar to those proposed previously for the site, and are acceptable in principle. However, there are a number of concerns with the arrangements as currently proposed, which are as follows:

- The treatment of the access via Woodhead Road is unclear. Are any improvements to the route proposed? How will the interaction with the existing plumbing business and emergency access be managed? Will there be any form of access controls? Etc.
- For the previous schemes that have been approved at the site, access to the Riverside Walk was available for the public via the Woodhead Road access. This now appears to have been prevented by the introduction of pedestrian and vehicle gates on the link bridge, which removes a significant public benefit of the scheme. A fully gated community that prevents pedestrian connectivity is also contrary to the Holme Valley Neighbourhood Plan.
- The Riverside Walk route from Lower Mill Lane is not of good quality, with a footway less than 2m wide proposed for the initial section, and a lack of any footway through the parking area adjacent to parking spaces P14-P22. There is also a lack of pedestrian crossing facilities at the link bridge crossing point.
- Access to the footbridge adjacent to parking spaces P22 is noted at being ramped. Whilst no details of the ramp gradient are provided, based on the limited spot level information it appears that the ramp would be in excess of 1:20, which would make it inaccessible for some users.

- The proposed Riverside Walk and footbridges are shown at 1.5-1.8m in width. This should be widened to a minimum of 2m clear width in accordance with DfT document 'Inclusive Mobility'. Consideration should also be given to whether the route could be upgraded for cycle use.

For the most recent planning approval for the site (Ref: 2018/90031), the draft S106 agreement required an 'Accessibility Improvement Contribution' of £25,000 towards accessibility improvements in Holmfirth Town Centre. This contribution is still considered to be necessary and should be secured via a Section 106 obligation. Due to the time that has lapsed since the previous contribution was agreed, it is recommended that an appropriate uplift of 20% is applied to the contribution to take into account construction cost increases. Therefore, an 'Accessibility Improvement Contribution' of **£30,000** should be provided. Other contributions and requirements relating to the Riverside Walk that were previously required should also be secured (with suitable index linked cost uplifts).

For the previous planning approvals at the site, a Travel Plan was provided and secured to the permissions. However, no Travel Plan has been submitted for this application. Therefore, a Travel Plan should be secured by condition, which will need to include specific measures to facilitate and encourage active travel for development users and their visitors. A Sustainable Travel Fund (STF) should also be secured via a S106 obligation, with the fund value based on the current cost of the Residential MCard scheme, to enable this or other appropriate travel plan measures to be delivered. Based on the 61 apartments proposed, this would equate to a Sustainable Travel Fund (STF) requirement of **£31,701.70** (£519.70 x 61 apartments).

Kirklees Council typically require a Travel Plan Monitoring fee to be provided for sites meeting the threshold for a Travel Plan (over 50 dwellings). However, as this has not been secured for the previous approvals at the site, and as the development is only just above the Travel Plan threshold, a Travel Plan Monitoring fee is not requested in this instance.

#### **Traffic Impact:**

The supporting Transport Statement includes an assessment of the likely peak hour traffic generations that would be associated with the development, which has been based on data obtained from the TRICS database for 'retirement flat' developments, using the 'per dwelling' setting. This assessment has estimated that during weekday network peak periods, the development would generate up to 7 two-way vehicle trips (based on a two-way trip rate of 0.122 between 0800-0900).

The Transport Statement goes on to suggest that if a more robust trip rate of 0.4 trip per apartment was utilised instead, this would equate to 24 two-way peak hour vehicle trips. However, the Transport Statement suggests that this level of traffic generation is unlikely to occur, and is more akin to a standard private apartment type development (e.g. without any age restriction).

HDM have reviewed the TRICS data contained with the Transport Statement and in the TRICS database itself. Based on this review, HDM consider that the development trip generations are likely to lie somewhere between the two trip rate scenarios. HDM have undertaken a further TRICS assessment scenario (utilising retirement flats trip rates, excluding edge of town sites), based on bedroom numbers rather than dwelling numbers. This has identified a weekday network peak period trip rate of 0.115 per bedroom, which would equate to a two-way traffic generation of 14 vehicle (based on 124 bedrooms).

In light of the above, based on any of the trip rate assessment approaches, the development is estimated to generate a maximum of 24 two-way vehicle trips during either the AM or PM weekday network peak periods. This would represent an increase of circa 1 vehicle every 3 minutes, which is not considered to represent a significant impact on the local highway network, and would be mitigated by the accessibility enhancements and TRO alterations that will be delivered by the development, as previously mentioned.

**Construction Access:**

As with the previous planning applications at the site, local residents have raised concerns regarding the use of Lower Mill Lane by construction traffic. These concerns are noted, and it will be necessary for a detailed Construction Management Plan to be agreed prior to commencement of development. As agreed for the previous planning approvals at the site, a Local Liaison Group must also be established during the construction phase, to ensure that issues and concerns from local residents and businesses are addressed.

Highway conditions surveys are also required before/after the construction phase, to ensure that any damage caused to the highway is rectified. This should also include the condition of retaining structures along the Lower Mill Lane river frontage.

The wording of the above conditions and S106 obligations that were agreed for the 2018 planning application (Ref: 2018/90031), which should be replicated for this application.

**Planning Conditions/Section 106:**

To be advised in due course once outstanding matters have been addressed, but with conditions/S106 requirements currently identified summarised below:

**Conditions;**

- Waste management strategy;
- Site access highway works details;
- Off-site highway works (parking controls and TRO amendments);
- Highway Structures conditions (See separate consultation response from Highway structures);
- Drainage of internal parking areas and access roads;
- Design details of Riverside Walk route;
- Control and management measures for on-site parking;
- Construction Management Plan (CMP);
- Highway Condition Surveys and Remediation.
- Travel Plan.

**Section 106 Contributions/Requirements;**

- Accessibility Improvements Contribution - **£30,000**
- Sustainable Transport Fund - **£31,701.70**
- Construction Management Plan, Local Liaison Group and Highway Condition Surveys and Remediation requirements;
- Riverside Walk and Bridge Works, including associated contributions (with index link uplifts), maintenance and public access rights.

**Conclusion:**

Further information required, see recommendation.