

**Consultation Response from KC,
Highways Development Management**

**2023/91715 Mohaddis E Azam Education Centre And Masjid E Madani, 225C, Ravenshouse
Road, Dewsbury Moor, Dewsbury, WF13 3QU**

Demolition of existing mosque and erection of mosque and education centre

Date Responded: 11/09/23

Responding Officer: CNB

Responding Ref: K14-5SE/4

This application is for the demolition of an existing mosque and the erection of a replacement mosque and education centre with parking and an access on to Ravenshouse Road, a 30mph, two-way, single carriageway, unclassified, distributor road of approximately 9m width with a hatched central reserve to protect right turn lanes, a pedestrian refuge, footways on both sides and street lighting present. It hosts a medium frequency bus route with stops within 130m of the proposal site. To the north of the proposal site the main road turns in to Low Road while the narrow estate road to the rear of the site takes up the name Ravenshouse Road. This Back Ravenshouse Road is a narrow (4.75m to 5.5m) estate road that serves a small number of residential properties. There have been several recorded complaints regarding car parking, obstruction and more severe highway safety issues in the area related to the proposal site including manoeuvring vehicle collisions with pedestrians and other vehicles. There has also been repeated abuse of the existing TRO markings around the site and on footway parking.

The site benefits from previous permissions for demolition and alterations and for a community centre, however in most cases a highways objection was raised based on parking and road safety issues caused by the existing development being intensified by the proposals.

Since the previous approvals, the car parking area on Ravenshouse Road has been granted conditional planning permission (18/92581) and has now been included within the current planning application and will provide 23 spaces. Previously the car park contained portable cabins used as teaching areas and it is noted that these are not shown on the proposed layout drawing (AIB/01 dated Sept 2021) and so it is expected that they will be removed prior to any commencement of work at the site to allow the car park to be used by contractors vehicles. During operation of the proposals the car park should be used exclusively for the parking of vehicles and not for storage or any other reason.

The submitted Planning Statement claims (in section 1.3) that the proposals are to improve facilities and would not lead to an increase in worshippers and this may be the case for the ground floor of the proposals although it is noted that section 4.4 indicates that the size of the Mehrab has been increased and thus may be able to take additional worshipers. However, the upper floors provide for an educational establishment and no details of this use has been provided and we would consider that this aspect of the proposals could cause an increase in trip generation and associated parking demand.

No trip generation details were provided with the application, and these would have needed to take account of both the educational use and the operation of the mosque at prayer times, when the highest trip generation and thus parking demand would occur. Details on staffing levels and numbers of students and operational times for the education aspect of the proposals would be required along with estimates of the numbers of worshipers at peak prayer times (this should be based on observations of the current use).

Without this information we cannot assess the impacts of the proposals on the immediate highway network or if the proposed parking provision would match demand to alleviate all the recorded issues concerning on-street parking and obstruction, and as such we would have to assume that the proposals would still cause the same parking and highway safety issues.

As stated in the previous HDM responses, the main concern is parking in the area. The limited on-street parking is in demand from existing residents, users of the existing mosque, local businesses and the existing convenience store. As previously mentioned, the Kirklees highway safety team have records of a considerable number of complaints relating to parking in the area based on obstruction of access and footways and visibility splays from accesses and junctions.

No parking demand details were provided with the application, Kirklees doesn't have parking standards for this type of development proposal, however previous guidance should be used as a starting point if no other observed information can be provided, and that would require 1 space per 5 seats or per 25sqm for visitor spaces plus 1 space per 3 staff and 1 cycle space per 40sqm. Based on the total area being 975sqm as indicated on drawing AIB/01 Proposed Ground Floor (Jun 23), the off-street parking requirements would be for 39 visitor spaces plus the required number of staff spaces with 24 cycle spaces. These are based on superseded standards but should be used as a starting point with suitable evidence to explain any reduction in parking provision.

The proposed car park is set out in drawing No AIB/01 Proposed Layout (Sept 2021) and shows a single access with 23 parking spaces, however paragraph 4.6 of the submitted planning statement suggests that there are spaces for 26 cars with two disabled spaces and this is not what is shown on the parking layout drawing. The parking spaces scale to approximately 2.4m x 4.8m with a 6m headway between spaces 1 to 20 to allow cars to manoeuvre safely. Spaces 21 to 23 are tandem against the edge of the car park and don't allow for independent access, ie space 23 would block in the other two spaces and space 22 would block in space 21. This may be suitable for staff parking or use at prayer times if the car park is managed and attendants can stack the cars, this process has been observed in use at other similar land uses, but this would require the use of marshals to control the parking.

However, no information has been provided with the application relating to car parking management and so we must assume that the total capacity will remain at 23 spaces, and this would fall short of the initial starting point requirements.

Drawing No AIB/01 Proposed Layout (Sept 2021) shows the car park with a single access over a dropped kerb crossing. The site, as constructed, has two gates and two dropped kerb crossings on to Ravenshouse Road and a single vehicle and separate pedestrian access on to the Back Ravenshouse Road. To comply with the proposal drawing we would like to see the second gated access on Ravenshouse Road (to the south) removed and the redundant dropped kerb crossing reinstated to a full kerb with the "H-bar" marking removed, and the vehicular access on to Back Ravenshouse Road removing. These changes should be clearly marked on a drawing and should be conditioned for highway safety reasons if you are minded for approval, and the works done within a s184 legal agreement with the council, with an appropriate footnote included, wording can be provided if required.

Due to the parking issues existing at the site we would also wish to see a construction access management plan submitted to provide details of the routes used to access the site, the types of vehicles expected to access the site, the location of off-street parking for contractors vehicles and deliveries, the location of materials storage and site welfare facilities and the use of traffic management and use of a banksman for larger deliveries that cannot turn on site. There should also be details of wheel washing facilities to avoid mud and debris from being dragged on to the highway for road safety reasons. This should cover both the demolition and construction phases and should be conditioned if you are minded for approval and wording can be provided.

Waste Storage and collection is to be from a small yard to the rear of the site, this yard is approximately 0.95m wide and may struggle to fit the appropriate number of waste bins for the site. This should be based on Kirklees Waste Strategy team guidance. The bins are also stored behind a gate and so this may not be a suitable location for collection as it may not be accessible to the collection crew. We would not wish to see bins left on the adopted highway or footway as they can cause an obstruction and highway

safety concern.

Due to the lack of trip generation and parking demand information, the shortage of car parking for the size of the proposals and the severe level of existing issues relating to parking and highway safety generated by the existing use, we cannot, again, support the proposals and wish to object on highways and highway safety grounds.