

Consultation Response from Chris Bembridge 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: 15/10/2024 Responding Officer: CNB Responding Ref: K14-5SE/4

This application is for the demolition of an existing mosque and the erection of a mosque and education centre with an existing car park with 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.

This application is for revised information in the form of a Car Parking survey covering Weds 4th September and Friday 9th September. This is the first week of term after the summer school holidays and as such the dates are acceptable.

These current comments should be read in conjunction with the previous set of comments as appended below.

The main concerns with the application were that the proposals may increase the parking demand at the site and would exacerbate the existing parking issues.

The additional information requested was for a parking survey of the area around the site in order to ascertain the exact numbers of available spaces for proposed users of the site and also to assess the number of areas with parking issues.

Unfortunately, the parking survey details submitted does not appear to represent what we have observed out on site and offers little weight to this additional information in our analysis of the proposals. It is noted that there is an increase in on street parking during prayer times on Fridays as indicated in the survey results but our observations have indicated this is greater than the results submitted. The use of the on-site car park on a Friday doesn't appear to show occupancy above 50% during Friday prayers when observations show that the car park is occupied beyond its proposed capacity by using a stacking process, which is an acceptable way of managing the car park as it keeps vehicles off the adopted highway.

It has been observed that during the operation of the current mosque there is an increase in off and on-street parking within the area around the site and that some of this is observed to be anti-social parking. However, it is noted that these problems only occur during prayer times and disperse shortly after.

The latest iteration of the proposals for the upstairs rooms appears to be very similar in size and form of the previously approved application and so we would not expect the increase in trips to be sufficiently great as to have a severe additional impact on the operation and efficiency of the local highway network highway, however we do appreciate that some issues currently occur we do not expect these be exacerbated by the proposals.

With this we accept that we may struggle to defend an objection to the proposals on highways grounds and so we would not wish to object in this case.

If the Planning Authority is minded to approve the application we would like to see a Parking Management Plan submitted for approval prior to first occupation and to remain in operation for the lifetime of the development and a construction access management plan that shows a layout plan of the site showing delivery and contractor parking, the location of site facilities and materials storage, location for larger deliveries and use of a banksman and the use and retention of wheel washing facilities to avoid mud or debris from being dragged on to the highway. Suitable wording can be provided.

Previous Comments (submitted 22/01/2024)

This application is for the demolition of an existing mosque and the erection of a mosque and education centre with an existing car park with 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.

This application is for revised information in the form of a Transport Statement from TPS Transport Consultants dated December 2023 (issue 1) and a Construction Traffic Management Plan also from TPS Transport Consultants dated December 2023 (issue 1).

These highways comments relate only to the additional information submitted by the applicant, as noted above, in response to the previous HDM comments submitted on 11/09/23 and attached below. These current comments should be read in conjunction with the previous set of comments.

Transport Statement

The main concern that HDM highways have with the proposals are the traffic and parking issues that currently occur with the existing mosque. The current proposals are for a new three storey mosque, and this would have a larger floor area than the permitted application 19/92515 and this would have the propensity to generate additional trips to the site and exacerbate the existing parking and road safety issues.

The initial assessment for the permitted site (19/92515) was for an internal area of approximately 632sqm as given on the application form, the current proposals are for approximately 975sqm as indicated on drawing No AIB 01, an increase of approximately 343sqm, although it is appreciated that not all this internal space will be occupied by users and includes staircases and access landings/corridors.

It is also noted that the within the transport statement, paragraph 2.3 Development Proposals suggests that the first floor will have 3 classrooms, 3 ladies' rooms, and office, a small kitchen, and toilets, however drawing No AIB/02 also shows a conference room and another room between the conference

room and the rear stairs. No mention is made in the Transport Statement for these two rooms or their use.

The third floor contains a room marked as “storage area”, this room is approximately 19m x 11m and this could possibly be used for other uses beyond storage.

There is a possibility that these additional rooms could generate trips above those generated by the current use of the building. This is not addressed within the transport statement.

The transport statement suggests that the current mosque has 150 worshipers at Friday prayers and that the amount wouldn’t increase, even though there was to be an increase in size of the prayer hall.

The off-street parking adjacent to the site is marked up for 23 spaces and this is not expected to change under the new proposals.

The trip generation section of the transport statement indicated that on-site observations suggested that most persons attending Friday Prayers on 8th December arrived on foot. No further details of the observations or the methodology of the observations were provided. If a full multi-modal survey was carried out, then we would expect to see full details of it provided within the transport statement.

There are no issues with servicing the proposed building based on the information provided within the transport statement.

Construction Traffic Management Plan

The construction management plan presents and explains the processes that will occur during the demolition and construction phases of the proposals with details provided regarding all the issues and concerns that were raised and responds to the wording of our usual construction access management plan condition, however there is no drawing provided showing how all the materials storage, contractor and delivery parking, with turning, and site facilities can be accommodated as indicated on the existing car park. As such this cannot be accepted.

The transport statement does not indicate realistically that there will be any improvement to the current parking issues and road safety concerns with the new proposals and the construction traffic management plan does not fully demonstrate how contractor parking and materials delivery/collection can be achieved without overspill on to the surrounding highway network.

With this we cannot support the proposals as they currently stand based on highway safety grounds as previously.

Previous Comments (submitted 11/09/23)

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 Ravenhouse 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 worshippers. 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 worshippers 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.