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Your Ref: 2023/92448  
Our Ref: ATE/23/00496/OUT  
Date: 15 September 2023

## Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: , Kirklees Metropolitan Council

**Application Ref:** 2023/92448

**Site Address:** Former Cooper Bridge Water Treatment Works, Leeds Road,  
Huddersfield, WF14 0BT

**Description of development:** Outline application for erection of B8 industrial  
unit

Notice is hereby given that Active Travel England's formal recommendation is as follows:

- a. ~~**No Objection:** ATE has undertaken a detailed assessment of this application and is content with the submission.~~
- b. ~~**Conditional approval:** ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.~~
- c. **Deferral:** ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.
- d. ~~**Refusal:** ATE recommends that the application be refused for the reasons set out in this response.~~

## 1.0 Background

Active Travel England (ATE) welcomes the opportunity to comment on this outline application for the erection of a B8 industrial unit. The site is located to the west of Mirfield and is identified as an employment site within the local development plan. The total floorspace of the building is approximately 28,000m<sup>2</sup> and the development would form an expansion of the John Cotton Group site, which includes the buildings and land bordering the site to the east.

## 2.0 Summary

While ATE acknowledges that this application is currently at outline stage, it is important that key active travel principles and facilities are agreed to at this stage so that these can be developed when full details are submitted at reserved matters. ATE has identified the provision of cycle parking and staff facilities as areas where further information is required. The current priority afforded to pedestrians and cyclists at junctions around the site is also poor and a significant concern, however it is acknowledged that improvements to this are in development.

## 3.0 National Policy and Guidance

The *National Planning Policy Framework (NPPF)* states:

104. Transport issues should be considered from the earliest stages of... development proposals, so that:

c) opportunities to promote walking, cycling and public transport use are identified and pursued.

110. In assessing specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; [and]

b) safe and suitable access to the site can be achieved for all users.

112. Applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; [and]

c) create places that... minimise the scope for conflicts between pedestrians, cyclists and vehicles...;

113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

*Local Transport Note 1/20 (LTN 1/20)* provides guidance to local authorities on delivering high quality, cycle infrastructure. More specifically relevant to this application is section 11 which relates to cycle parking and other equipment.

*Gear change: a bold vision for cycling and walking* is the Government's cycling and walking plan for England. This sets the Government's vision for cycling and walking to be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030. Active Travel England's responsibilities for walking also extend

to “wheeling”, such as the use of wheelchairs (self-propelled or powered) and mobility scooters.

*Inclusive mobility: making transport accessible for passengers and pedestrians* provides guidance on designing and improving the accessibility and inclusivity of public transport and pedestrian infrastructure.

#### **4.0 Opportunities**

The application, and particularly its location, benefits from a range of attributes which have the potential to facilitate walking, wheeling and cycling as a desirable choice for commuting journeys as identified below.

##### Proximity to urban areas

The application site is located on the western edge of Mirfield, but the urban areas of Huddersfield, Brighouse and Dewsbury are all nearby. It is therefore possible that a significant proportion of employees will live within a distance that would result in them having the option to undertake all or part of their journeys to the site using active travel modes.

##### A62 to Cooper Bridge Corridor Improvement Scheme

ATE recognise that a Preferred Option consultation was undertaken on the A62 to Cooper Bridge Corridor Improvement Scheme in 2021 and the local highways and planning authorities have explored improvements to the highways infrastructure for several years leading up to that consultation. At the time of that consultation the intention was to commence development in 2024. The Preferred Option included provision of controlled pedestrian crossings at the Cooper Bridge roundabout and the junction of Leeds Road and Huddersfield Road, which is adjacent to the main entrance to this site. The improvements also include the provision of segregated cycle lanes along this highway corridor. These improvements, when carried out, would significantly improve the accessibility of the site for pedestrians and cyclists.

##### Mode share targets

Table 1 of the Travel Plan identifies mode share targets for commuting journeys. These include 14% for on-foot and 1% for by-bicycle. The on-foot target is reasonably positive and likely reflects the proximity of the site to urban areas. Comparatively, the mode share for cycling is low and this likely reflects the nature of the surrounding highways infrastructure. There is scope therefore for a significant improvement in this mode share if improvements to infrastructure and facilities encourage this.

##### River Calder towpath

The towpath runs along the southern bank of the River Calder at Mirfield before crossing over to the northern side of the river immediately to the east of the application site. Although it is accepted that this path may not be suitable for all users at all times of the day and year, for some it will represent a significantly more attractive walking route to the site from Mirfield compared to walking on Huddersfield Road.

For these opportunities to be realised, ATE considers that the principle and details of infrastructure to encourage active travel among employees of the site should be agreed at

outline stage and would request that these are added to the Site Plan and Travel Plan to ensure they are carried through at reserved matters stage.

## **5.0 Areas of Concern**

In its current form, this application does not adequately demonstrate a commitment to how the proposed development will ensure that active travel modes are prioritised and ATE has summarised its key concerns below.

### Cycle parking and staff facilities

- The Travel Plan states that “covered and secure cycle parking will be provided within the site in accordance with Kirklees Council’s prevailing parking standards.” However, within Kirklees Council’s Highway Design Guide SPD (2018), paragraph 5.4 states that, “Kirklees Council has not set local parking standards for residential and non-residential development.” The development should therefore conform to LTN 1/20 standards detailed in Table 11-1, which advises a minimum of 1 secure and covered space per 500m<sup>2</sup> of floorspace. Based on a floorspace of 27,630m<sup>2</sup> this would result in a minimum of 56 spaces to be provided. The submitted Site Plan does not show any cycle parking and should be amended to show indicatively where this will be provided. A planning condition should also ensure full details of any structure and the type of stands to be used should be submitted at reserved matters. The Travel Plan should also be updated to confirm the number of spaces to be provided.
- In addition to the above, it should be made clear what facilities are available for staff who travel to the site using active travel modes. Section 11.7 of LTN 1/20 advises that to facilitate longer cycle commutes places of work should have changing rooms, lockers, showers and drying rooms. It should be made clear which of these facilities will be provided within the new development. If these are located within part of the existing site details should be provided of what these facilities are, their size, and where they are located in relation to cycle parking. As above, the Travel Plan should be updated to provide more details on these facilities.

### Current active travel infrastructure

- Although it is acknowledged that the Council is exploring improvements to the highway infrastructure in the vicinity of the site, it is not clear whether any improvements have been fully committed to at this stage. The existing infrastructure and the lack of pedestrian crossings on Huddersfield Road, Leeds Road and at the Cooper Bridge roundabout is of concern to ATE. Given the reasonably high walking mode share in commuting journeys to the site, all of these trips will include the need to cross these busy highways using uncontrolled crossings. At peak times this will be challenging and potentially unsafe. If the A62 to Cooper Bridge Corridor Improvement Scheme was not under review then ATE would be strongly encouraging that this scheme contributes to the delivery of pedestrian crossings to these highways because the development will intensify the number of crossings.
- There is a short length of cycle lane separated from the highway by a painted line on Huddersfield Road outside the frontage to the site, however the length and limited protection of this cycle lane means that this is unlikely to be genuinely attractive to cyclists. Other infrastructure for cyclists is limited to sharing footways with pedestrians, which vary in width and surfacing quality. Leeds Road, Huddersfield Road and the A644 have high volumes of traffic and generally give full priority to motor vehicles with no provision for cyclists in the highway.

The local planning authority should liaise with the Combined Authority team responsible for the A62 to Cooper Bridge Corridor Improvement Scheme and consider their response to the application, any potential impact on the improvement scheme and any changes to the expected timescales of delivering the scheme.

## **6.0 Next Steps**

In consideration of the above ATE, recommend that the local planning and highways authority considers the following points to discuss with the applicant:

- Amendments to the Site Plan and Travel Plan to provide details in principle of the provision of cycle parking (minimum 56 spaces) at the site and the provision of any staff facilities such as changing rooms, lockers, showers and drying rooms.
- Ensure the team/department leading on the A62 to Cooper Bridge Corridor Improvement Scheme have been consulted on the application.

ATE hopes this advice has been useful and requests that the local planning authority shares this correspondence with the applicant and their agents. ATE would be content to review further submitted information to help address the above identified deficiencies if required.