

**Consultation Response from KC, Highways Development Management (HDM)**
**2023/92448 Former Cooper Bridge Water Treatment Works, Leeds Road, Mirfield, WF14 0BT**
**Outline application for erection of B8 industrial unit**
**Date Responded: 25/10/23**
**Responding Officer: A Darwin**
**Responding Ref: HDC 10-2NW/1**
**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 access proposals are required, with the further submission including fully dimensioned plans, visibility splays, swept path analysis (SPA) and details of any proposed departures from standard. Changes to the sites redline boundary are also required to accommodate the necessary changes. Once the arrangements have been agreed in principle (including agreement with Calderdale Council), the designs must then be subject to the Stage 1 Road Safety Audit process prior to determination. These access arrangements also need to be agreed with the Councils Major Projects Team, to ensure they are compatible with the A62 to Cooper Bridge Corridor Improvement Scheme that is being developed, and sufficient land within the development site must be safe guarded to ensure this scheme is not prejudiced. The site access and layout proposals also need to take into account any associated changes to the existing John Cotton site, including amendments to the existing parking, access and servicing arrangements.
- Detailed assessment of the traffic impact of the development on the local highway network is required, with the scope of assessment agreed in advance with HDM. This should include further information/justification regarding the approach to trip generation and distribution.
- Further justification of the on-site parking provision is required, which should take into account the end-user specific requirements. Opportunities to address any existing shortfall in parking at the existing John Cotton site should also be identified.
- A more detailed assessment of the sites accessibility by alternative transport modes to the private car is required, including a qualitative and quantitative assessment of the local transport network. Subject to these findings, a package of interim improvements may be required to ensure the site is accessible in the interim period before the A62 to Cooper Bridge Corridor Improvement Scheme is implemented. The applicant should also investigate the feasibility of providing a pedestrian/cycle link to the canal and riverside paths to the east of the site.
- Further details of the proposed site operation are required, including proposed staff numbers, shift patterns, operating hours etc. This information should then be used to inform the Transport Assessment process and to further develop the sites Travel Plan.
- The Travel Plan needs to be updated to provide a more comprehensive package of measures, a more thorough review of the sites accessibility, user-specific modal split information and targets, and clear information regarding the approval, monitoring and review processes.

**Overview:**

An outline planning application for the erection of B8 Storage and Distribution/Industrial unit has been submitted, with the following information provided on the application form:

- Existing GIA to be replaced = 240sq.m;
- Proposed GIA = 27,870sq.m;
- Net increase in GIA = 27,630sq.m;
- Site area = 6.1 Hectares
- Operating times = 24hrs, 7 days per week including bank holidays;
- 140 proposed car parking spaces (with no existing car parking affected);
- All matters reserved, except for access.

It is noted that the above car parking details are incorrect, as the proposals include replacement parking on both sides of the existing treatment works access on to Huddersfield Road, including parking areas to the east that are currently served from other existing John Cotton access points. Whilst layout and parking details have been identified as being reserved matters, a full understanding of the new/amended parking and access arrangements are required, as these matters have a direct impact on the new site access arrangements that would be established by this outline planning application. It is noted that additional changes within the existing John Cotton site may be necessary to accommodate these changes, which need to be clearly identified and included within the sites redline boundary.

The proposal site is allocated in the Kirklees Local Plan, with site reference ES9, which has an indicative capacity of 14,910sq.m GIA. As confirmed in the site allocation box, 'Additional mitigation on the wider highway network will be required'.

Kirklees Local Plan Policy 'LP19 – Strategic transport infrastructure' identifies a number of strategic transport infrastructure improvements, which includes 'TS1 A62/A644 Huddersfield to M62 J25' (also known as the 'A62 to Cooper Bridge Corridor Improvement Scheme'). These proposals are currently being developed by Kirklees Council, in partnership with Calderdale Council and the West Yorkshire Combined Authority (WYCA), with the Outline Business Case (OBC) dated September 2021 approval by WYCA. Kirklees Council is currently developing the scheme further, and are due to submit the Full Business Case (FBC) in late 2024, with works envisaged to be completed in 2027.

The former treatment works site is located immediately adjacent to the 'A62 to Cooper Bridge Corridor Improvement Scheme', and will directly benefit from the traffic capacity, accessibility, and other benefits of the scheme. As such, in accordance with LP4 & LP19, it is expected that this development will provide a proportionate financial contribution to this scheme, and the development must be designed to ensure that it does not prejudice its future delivery, including the safe-guarding of land where necessary.

As confirmed in the application submission, discussions have taken place between Kirklees Major Projects Team and the applicant to discuss the interaction between the A62 to Cooper Bridge Corridor Improvement Scheme and the development site, including the implications in terms of access; and it is understood that these discussions are ongoing. HDM have consulted the Major Projects Team and the comments provided by HDM in this response that relate to access are cognisant of these ongoing discussions.

With regarding to the timing of the A62 to Cooper Bridge Corridor Improvement Scheme, the Transport Assessment provided in support of this development site states at paragraph 4.2.1:

*'...subject to funding being approved through the 'West Yorkshire Plus Transport Fund' process, it is understood that the scheme is programmed for delivery between September 2025 and May 2027. This timescale does not align with John Cotton Group's commercial requirements and specific short-term need for storage space (ideally close to the factory).*

*Accordingly, a series of discussions have been held with Kirklees Council's major projects team through preparation of the planning application to ensure that the proposed access arrangements both align with the Council's wider scheme, and are capable of being brought forward satisfactorily on an independent basis before the Council's scheme is delivered. The intention is that the proposed development can be implemented prior to, but does not prejudice, future delivery of the Council's wider highway improvement scheme.'*

HDM acknowledges that the timescales of the A62 to Cooper Bridge Corridor Improvement Scheme may not align with the applicants' timescales. However, given that these improvements will contribute to the delivery of suitable access arrangement (for all transport modes) for the development site, it is necessary for the development to ensure that suitable access arrangements are developed that work with the existing and future highway arrangements, which may involve interim measures to address existing traffic capacity issues and accessibility constraints. At this stage, these issues have not been satisfactorily addressed (see further comments below).

### Site Access Arrangements:

The following access arrangements are proposed:

- In only access from Cooper Bridge Road, which would replace the minor access that previously served the former treatment works site. This site access is intended to be the sole access for inbound HGV's, and would also be used by staff accessing some of the proposed car parking.
- Upgrade of the existing access on to Huddersfield Road that previously served the former treatment works site, which would be an all-movements junction for access to/from the proposed car parking, and egress only for HGV's.
- The Huddersfield Road access is also proposed to serve an area of existing car parking within the existing John Cotton site to the east, which is proposed to be rearranged. However, no details are provided of the wider changes within the existing John Cotton site that are proposed. Therefore, it is unclear how these changes may affect traffic flow within the existing site and the other existing accesses on Huddersfield Road, which needs to be clarified.

The following comments are provided regard the proposed access arrangements:

#### In only access on Cooper Bridge Road

Within the vicinity of the proposed Cooper Bridge Road access, the highway is under the control of Calderdale Council. As such, HDM have consulted with their counterpart at Calderdale Council to discuss the access arrangements, as well as Kirklees Council Major Projects Team and other internal consultees. Based on these discussions, there are significant concerns with the access arrangement proposed, as follows:

- The proposed entry only access on to Cooper Bridge Road may be acceptable in principle. However, inbound right turn movements are not acceptable at this access for safety/operation reasons; and are likely to result in rear shunt incidents associated with the lack of any right turn lane facilities, as well as right turning incidents associated with the close proximity of the signalised roundabout to the north. These problems would be further exacerbated once the A62 to Cooper Bridge Corridor Improvement Scheme is delivered, which are currently envisaged to include two southbound lanes on Cooper Bridge Road. Therefore, only a left in access could be accepted in this location, which would require any northbound development traffic on Cooper Bridge Road to circulate Cooper Bridge Roundabout (or the revised gyratory system currently being developed) before entering via this access.
- As only left in access could be accepted, physical measures to prevent right turn movements into the site access should be provided. However, as there are width constraints on Cooper Bridge Road that will not allow this in the interim situation (a separation island can be implemented later with the A62 to Cooper Bridge Corridor Improvement Scheme), the only physical measures that are likely to be possible in the interim situation would relate to the alignment of the access to discourage right turn movements, and in particular HGV's, which must be incorporated into the proposals.
- To further discourage right turn movements into this site access, it is suggested that a 'no right turn' TRO and signage/markings are provided on Cooper Bridge Road. Based on HDM's initial discussions with their counterpart at Calderdale Council, it was considered that in principle a TRO of this type may be acceptable in this situation.
- Whilst a left in access on Cooper Bridge Road may be acceptable in principle, the arrangements currently proposed are unacceptable. The access must be designed in accordance with DMRB standards, which require (see 5.6.2 of CD 123) 15m corner radii, with a corner taper of 1:10 over a distance of 25m on the minor arm, to ensure that HGV's traffic can turn left at an appropriate design speed, without causing rear shunt type incidents. In addition to these junction geometry requirements, right turn movements into the access need to be actively discouraged as mentioned above. The minor arm of the site access also needs to be of sufficient width to allow an inbound HGV's to pass a stationary vehicle (either parked or broken down), to ensure that blocking back onto the highway does not occur.
- Careful design of the cycle/footway crossing of the site access arm also needs to be considered in the design, as well as safe pedestrian/cycle access to/from the site.
- Based on the necessary changes to this site access design, it is clear that land beyond the applicants site boundary to the north (that has been procured by Kirklees Council to deliver the wider Cooper Bridge improvement scheme) will be required to deliver an acceptable access arrangement, and the redline boundary for the planning application will need to be amended (HDM have already identified this matter to the Planning Officer).

- In addition to the above requirements, land must be safeguarded within the site, which will enable the access to be amended in future to accommodate the A62 to Cooper Bridge Corridor Improvement Scheme. This will need to be discussed further with Kirklees Highways Major Projects Team. However, it is noted that a left in access as described above appears to be achievable.

In light of the above, significant changes are required to the Cooper Bridge Access arrangements, which must be designed to work with the current highway arrangements and the future A62 to Cooper Bridge Corridor Improvement Scheme. Updated plans are required of these revised access proposals, which should be fully dimensioned and include swept path analysis (SPA) of HGV's that have been undertaken at an appropriate design speed (to be confirmed in the SPA report).

Subject to an acceptable access arrangement being demonstrated in principle, these arrangements will then need to be agreed with Calderdale Council as Local Highway Authority for this section of Cooper Bridge Road, and a Stage 1 Road Safety Audit and Designers Response will be required. Prior to undertaking any Stage 1 RSA, an RSA Brief will need to be agreed by both highway authorities.

#### Upgraded access on Huddersfield Road

HDM have consulted with Kirklees Major Projects Team and other internal consultees regarding the upgraded access proposals on Huddersfield Road. Based on these discussions, there are again significant concerns with the access arrangement proposed, as follows:

- A right turn lane is proposed at the upgraded site access junction on Huddersfield Road, which is proposed to replace the existing hatch markings. However, the layout of the right turn lane is not in accordance with DMRB standards, which includes a lack of adequate deceleration length, storage length, taper and lane width. These deficiencies cannot be addressed due to the location of the adjacent traffic signals, and are significant road safety concerns that could result in rear shunt collisions, late braking and blocking back to the traffic signals.
- As adequate right turn lane facilities cannot be provided at the site access, it is suggested that this movement is prevented through the introduction of a physical segregation island, which appears to be achievable for both the interim situation and with the A62 to Cooper Bridge Corridor Improvement Scheme by extending the existing physical island at the signalled junction passed the site access in the existing hatched area. Whilst preventing right turners into this access will alter the access strategy for the development, this arrangement would still enable access to the site, subject to the left in access only on Cooper Bridge Road being achievable and being made available for both HGV's and staff traffic.
- Following consultation with the Councils Road Safety team, significant concerns have been raised regarding right turning vehicles exiting the site access on to Huddersfield Road, as this traffic would need to turn right through westbound queuing traffic at the adjacent traffic signals, which would significantly restrict visibility and create unsafe turning manoeuvres. It is noted that this safety problem has already been acknowledged by the applicant, as they have installed informal 'no right turn' signage at this existing access.
- As safe turning for right turners out of the access cannot be achieved, it is suggested that right turn movements from the site access are again prevented through the introduction of a physical segregation island as mentioned above. Whilst preventing right turners out of the access will alter the access strategy for the development, development traffic will still be able to head east on Huddersfield Road, but would need to first circulate the highway network via the Cooper Bridge Roundabout for these journeys (which will still be possible with the A62 to Cooper Bridge Corridor Improvement Scheme in place).
- No details of junction visibility have been confirmed in the Transport Assessment or the supporting plans. However, it is clear that junction visibility to the right on exit of the site access is not in accordance with DMRB requirements (e.g. below 2.4x120m based on 40mph speed limit) and is severely sub-standard. It is noted that it may be possible to address this issue by setting back the boundary wall in the existing John Cotton site to the east of the access. However, this will have implications on the existing parking area and service yard, and the necessary amendments need to be identified. It is noted that these changes will also require further changes to the planning application red line boundary.
- The site access plans do not currently acknowledge the existing cycle lanes on Huddersfield Road, or provide suitable arrangements for pedestrians and cyclists, which must be incorporated into the design.

In light of the above, significant changes are required to the Huddersfield Road access arrangements, which must be designed to work with the current highway arrangements and the future A62 to Cooper Bridge Corridor

Improvement Scheme. The only feasible option appears to be a left in/left out priority junction (or alternatively a fully signalised junction could be considered, although traffic capacity issues are likely to preclude this as an option). Updated plans are required of these revised access proposals, which should be fully dimensioned and include swept path analysis (SPA) of HGV's that have been undertaken at an appropriate design speed (to be confirmed in the SPA report).

Subject to an acceptable access arrangement being demonstrated in principle, a Stage 1 Road Safety Audit and Designers Response will be required. Prior to undertaking any Stage 1 RSA, an RSA Brief will need to be agreed by HDM.

In addition to the above issues, the following access issues also require further consideration:

- What security arrangements are proposed for the site? Should security gates/barriers be proposed, these need to be carefully sited to ensure that blocking back on to the highway does not occur.
- As traffic unrelated to the development may inadvertently access the site, particularly from the Cooper Bridge Road access, how would this traffic be managed? Presumably this traffic will need to be allowed to exit via the Huddersfield Road access, which will have implication on the site security arrangements.
- As other traffic will enter via the Cooper Bridge Road access and pass the main building / service yard, what measures will be provided to ensure that there is no conflict between this traffic and turning/circulating HGV traffic?
- No details of the access arrangements for the retained treatment works site have been identified in the Transport Assessment. As such, further details, including swept path analysis are required to confirm that adequate access is maintained for this use.
- As previously stated, the proposals include changes to the existing parking/servicing arrangements in the existing John Cotton site to the east. These physical changes and their impact on the existing site use need to be clearly identified, including details of how this will affect access to/from the existing site.
- Access for emergency service vehicles needs to be considered and SPA provided. Given the height of the proposed building, access for hydraulic inspection platform vehicles is likely to be required.

#### **Accessibility:**

The Transport Assessment provided in support of the proposal states:

*'A range of options exist to travel to and from the site by sustainable modes, including on foot, by cycle and by public transport.*

*The highway network in the immediate vicinity of the site is considered to be fit for the intended purpose. A wider package of improvements is being progressed for delivery by the Council to support wider growth in the area, and this will represent a benefit to the operation of the network in the vicinity of the site.'*

HDM disagrees with the above conclusions. Whilst the local network will be significantly improved once the A62 to Cooper Bridge Corridor Improvement Scheme is delivered, which will include major enhancements to pedestrian and cycle facilities on the local network, there are currently significant issues on the local network that have not been identified in the Transport Assessment. This includes a lack of safe pedestrian/cycle crossing facilities on either Cooper Bridge Road or Huddersfield Road, which is a significant barrier to accessing the development by sustainable transport modes, including safe access to bus stops. These concerns have also been identified by Active Travel England (ATE) and the West Yorkshire Combined Authority (WYCA) in their consultation responses.

In light of the above, a more thorough assessment of the site accessibility is required, including a qualitative and quantitative assessment of the routes and facilities on the local network (including bus stop access and provision), together with a package of improvements that may be required in the interim situation before the wider A62 to Cooper Bridge Corridor Improvement Scheme is delivered.

Improvements to the site access arrangements should also be identified to ensure that high quality access is provided for pedestrians and cyclists, and to ensure that the arrangements for these users on the adjacent highway are not compromised by the development (and enhanced where possible). This should include suitable pedestrian/cycle access via both of the proposed site access points, which link to the developments pedestrian entrances and cycle parking facilities.

WYCA have been consulted regarding the proposals and have requested that funding of **£21,000** be provided by the development, to enable real-time displays to be installed at bus stops 14001 and 13100 on Cooper Bridge Road. Whilst these bus stops are not the closest stops to the site, they are the only stops that can currently be accessed safely in both directions (via a towpath connection under Cooper Bridge Road) due to the lack of pedestrian crossing provision on the local network. As such, in addition to the applicant investigating interim measures to improve pedestrian crossing provision on the local network to enable access to bus stops, it is recommended that this real-time display contribution is secured via a S106 obligation.

HDM have consulted the Councils Public Rights of Way (PROW) team regarding the proposals. Whilst there are no Definitive PROW within the immediate vicinity of the site that are affected by the proposals, they have highlighted that there are publicly available pedestrian/cycle routes to the east of the site adjacent to the River Calder and the Calder and Hebble Navigation Battye Cut that lead towards Wood Lane and the NCN 66 Calder Valley Greenway beyond. However, the PROW Team have identified that there is currently limited access to these routes from Cooper Bridge Road and Huddersfield Road. As such, there is an opportunity for the development to facilitate a link to these routes through the site, which would be a significant benefit to the local area and enhance the accessibility of the development site by active travel modes.

In light of the above, the applicant is requested to investigate the possibility of providing a link to these canal/riverside routes through the site, which should be accessible to both pedestrians and cyclists. It is noted that these routes are managed and maintained by the Canal and River Trust, and their agreement to any links would be required. As such, HDM can provide contact details for their representatives so this matter can be explored. It is also noted that to facilitate these links, a route would need to be created through the retained waste water treatment works site that is beyond the site's red-line boundary to the east. However, it is envisaged that this may be achievable, given that the development site has been purchased from the same landowner. HDM have visited site to check on the feasibility of providing a connection to these routes, which appears to be achievable from the northeast corner of the treatment works site, but would be subject to some tree loss that would also require further investigation.

#### **Travel Plan:**

A draft Travel Plan has been provided in support of the development, which is proposed to be developed further once the site becomes operational. Whilst this approach may be acceptable for a development where the end user is unknown, this is not the case here, with the development being designed for the specific needs of John Cotton Group Ltd. As such, the draft Travel Plan should be developed further based on the specific requirements of the business, and must take account of their specific circumstances and any barriers to accessibility (e.g. required shift patterns that may limit bus use etc). The Travel Plan should also be based on user specific mode split data, which could readily be obtained from their existing site and not the generic census data that has been used. The Travel Plan should also be targeted at the entire John Cotton Group Ltd business/staff in Mirfield, and not just staff at the proposed warehouse.

With regard to the specific measures in the Travel Plan, there is currently a lack of significant measures to encourage / facilitate access by sustainable modes, with the vast majority of measures related to the provision of information, which whilst welcome are unlikely to be that effective on their own. As such, a more comprehensive package of measures and actions should be incorporated into a revised Travel Plan for review by HDM, which are designed to achieve set targets and include clear remedial actions (with a defined budget and penalties) if targets are not met.

Other specific points relating to the Travel Plan that need to be addressed are as follows:

- Details of the proposed site operations, including working hours, staff numbers (split by job type/working hours) and shift patterns are required;
- Further consideration of the proposed modal split is required, which should be informed by end-user specific data and not generic census data. Once a suitable modal split has been established, interim targets should be set for single occupancy car trips, as well as for sustainable transport modes.
- A more thorough review of accessibility should be included. This should include an assessment of the quality of existing infrastructure, and identify any interim improvement works that are necessary in advance of the A62 to Cooper Bridge Corridor Improvement Scheme.
- The Travel Plan should be clear of what measures and actions will be incorporated, and should avoid any reference to 'consider' measures, which lacks any firm commitment. It is noted that some

commitments that are included in the Action Plan are not referenced elsewhere in the report (e.g. the commitment to join the West Yorkshire Travel Plan Network, which is welcomed). The Action Plan should also include all key actions required of the Travel Plan Coordinator, including all timescales and procedures. This should include clear information on how the Travel Plan and measures are to be agreed, monitored and reviewed in conjunction with the LPA and other stakeholders. The proposed timescales need to ensure that all measures are in place upon first occupation.

- Reference has been made to setting up a car sharer scheme. However, no details of other complimentary measures have been identified (e.g. guarantee lift home scheme, priority parking for car shares etc.).
- Measures to encourage public transport use should be provided. Given that a commitment has been made to join the West Yorkshire Travel Plan Network, the opportunities for discounted / taster tickets should be possible, and an initial offer and budget for this should be set out in the Travel Plan.
- To allow an effective Travel Plan to be operated at the site, a Travel Plan budget will be required to allow measures to be delivered on an annual basis, and this should be clearly set out in the Travel Plan and set at a level that would allow meaningful Travel Plan measures to be implemented.
- Safe, secure and covered cycle parking facilities must be provided in accordance with LTN 1/20 guidance, as well shower, locker, changing and drying facilities. Motorcycle parking and equipment storage should also be incorporated.
- The Travel Plan is currently aimed at staff and visitor travel only. However, measures should also be incorporated that address business use and operations.
- There are currently spurious references to cycle measures that are available in Leeds, which need to be addressed.
- The suggestion that a 50% response rate to staff surveys is not acceptable, and a 100% response rate should be targeted.

Kirklees Council require Travel Plan monitoring fees to be secured as part of the S106 agreement. For a development of this scale (classed as a 'Large Scale Major Development' that is in excess of 10,000m<sup>2</sup>) the fee is **£15,000** (£3,000 per year for 5 years).

### **Highway Safety:**

As previously stated, there are significant highway safety concerns regarding the site access proposals, which must be addressed. In addition to this, interim improvements are required to pedestrian/cycle facilities (provided in advance of the A62 to Cooper Bridge Corridor Improvement Scheme), to enable safe and convenient pedestrian/cycle links to the wider network (including public transport facilities).

The Councils Road Safety Team have also highlighted that problems have occurred in the past associated with John Cotton staff and visitors parking on the local highway network, including on nearby residential streets. As such, the development needs to ensure that adequate on-street car parking is available for all development users, to ensure that these problems are not exacerbated. Furthermore, the proposed development provides an opportunity to improve the parking facilities for the wider John Cotton site. As such, further information is required regarding the proposed parking provision to confirm that it is adequate to serve the development, and potentially address any existing shortfall in provision (see further comments below relating to car parking).

### **Parking:**

Whilst it is acknowledged that the planning application is submitted in outline with all matters reserved except for access, it is necessary for the applicant to demonstrate that adequate parking facilities can be provided within the site.

However, based on the submitted information, it is unclear what provision is currently envisaged, as the reports and plans suggest that 140 new car parking spaces are proposed, but 154 spaces are shown on the plans, some of which appears to be replacement parking for the existing John Cotton site.

The supporting Transport Assessment also states that future parking provision would be *'in accordance with Kirklees Council's prevailing parking standards.'* However, it is noted that Kirklees do not have prescriptive standards related to car parking, and these must be established through an assessment of the development operational parking requirements. Therefore, the applicant should provide further supporting information based

on empirical data regarding the proposed parking levels, and any associated changes to the provision for the existing John Cotton site, which must take into account the additional parking requirement during shift change periods.

It is noted that in accordance with the Homes and Communities Agency guidance document 'Employment Density Guide 2015' the lowest employment rate per GEA for B8 development is suggested to be 1 FTE per 95sq.m. When this is applied to the development site, this would equate to 284 FTE staff. Therefore, this suggests that the level of parking currently proposed is inadequate, and further space within the site needs to be safeguarded for this purpose or the proposed development floor area reduced.

The proposed car parking must also include disabled/accessible parking provision, which is designed in accordance with national standards, including DfT document Inclusive Mobility. EV Charging facilities are also required, which are in accordance with the minimum standards identified in the West Yorkshire Low Emission Strategy (WYLES) – See the Councils Environmental Health Consultation Response for further details on this matter.

High quality cycle parking facilities are required for the development, which must be secure, covered, well located near to building entrances and accessible via safe routes through the site that link to the wider network. For further information on the level and quality of cycle parking provision that is required, the applicant should refer to the guidance contained in DfT document LTN/120.

Whilst the planning application is in outline only, the indicative masterplan should be updated to demonstrate that adequate parking can be made available for all modes based on the scale of development proposed, and good quality access to/from these facilities are made available.

#### **Servicing:**

As layout is a reserved matter, no specific comments are provided regarding the proposed servicing arrangements shown on the site plan, and these arrangements will need to be agreed at the reserved matters stage. However, as previously mentioned, further consideration should be given at this stage to the access routes and security arrangements that are to be provided within the site, to ensure that the interaction between service vehicles and other users (either staff or other traffic that may have inadvertently entered the site) are safely managed. The proposals should also be designed to minimise the need for vehicle movements on the highway between the existing and proposed John Cotton sites.

#### **Traffic Impact Assessment:**

No formal pre-application consultation was undertaken with HDM in advance of the planning submission. Therefore, the scope of the traffic assessment including in the applicants Transport Assessment (TA) has not been agreed in advance, contrary to the NPPF Planning Practice Guidance (PPG).

Unfortunately, the assessment methodology used in the TA is currently not accepted, and further information/clarification and detailed traffic capacity assessment information is required. It is noted that National Highways have been consulted regarding the proposals, and any issues that they raise will also need to be addressed. It is also noted that no traffic figures have been included in the TA (although these have been referenced in the report), and these need to be provided with any further submission.

Comments regarding the traffic assessment methodology are as follows:

#### *Trip Generation*

Section 5.1.1 of the TA confirms that TRICS has been utilised to determine the vehicle trip generations for the development, which have been identified for various weekday peak hour periods in Table 4. These vehicle trip rates appear to be generally acceptable for traffic assessment purposes. However, further details of the proposed site operation, including staff numbers, shift patterns etc are required to confirm that this data is fully representative of the development.

No assessment of multi-modal trips has been identified in the TA, which is necessary to identify the development implications and requirements for other transport modes. This information should be provided in accordance with good practice guidance and informed by user specific information. The identified modal split should also directly relate to the Travel Plan Targets, which should be challenging but achievable based on appropriately targeted Travel Plan Measures.

Section 5.1.2 of the TA sets out the existing HGV trips to/from the existing John Cotton site in Mirfield and their warehousing facilities at Ravensthorpe, Euroway (Oakenshaw) and Ossett, which are proposed to be replaced by the facilities at the development site. This data has then been utilised at Section 5.1.3 to identify the net increase in trips, once these existing trips divert to/from the development site. The following tables have been extracted from the TA that shows the diverted HGV trips and net impact of development traffic:

**Table 4: Existing HGV Trips to / from Satellite Sites - Average Weekday**

Origin / Destination	HGV Trips per Average Weekday		
	Arr. to Mirfield	Dep. from Mirfield	Total
Ravensthorpe	32	34	66
Euroway	29	47	76
Ossett	2	4	6
<b>Total</b>	<b>70</b>	<b>86</b>	<b>156</b>

**Table 5: Existing HGV Trips to / from Satellite Sites - Average Weekday Peak Hours**

Origin / Destination	Weekday AM Peak Hour			Weekday PM Peak Hour		
	Arr at Mirfield	Dep from Mirfield	Total	Arr at Mirfield	Dep from Mirfield	Total
Ravensthorpe	3	3	7	3	3	7
Euroway	3	5	8	3	5	8
Ossett	0	0	1	0	0	1
<b>Total</b>	<b>6</b>	<b>9</b>	<b>15</b>	<b>6</b>	<b>9</b>	<b>15</b>

**Table 6: Vehicle Trip Generation - Weekday Peak Hours**

Time Period	Mode	Total Vehicle Trips		Existing Journeys to Satellite Sites, Diverted to Development		Net Vehicle Trips		
		Arr.	Dep.	Arr.	Dep.	Arr.	Dep.	Tot.
Weekday AM Peak Hour	Total Vehicles	46	36	9	6	37	30	67
	HGVs	12	18	9	6	3	12	15
	Light Vehicles	34	18	-	-	34	18	52
Weekday PM Peak Hour	Total Vehicles	33	59	9	6	24	53	77
	HGVs	21	13	9	6	12	7	19
	Light Vehicles	12	46	-	-	12	46	58

Whilst the principle of netting off the existing HGV trips is accepted, HDM have a number of queries regarding the assessment approach that has been used, as follows:

- Further explanation is required relating to the data contained in table 4, to explain why there is a significant discrepancy between the total number of arrival and departures. It is assumed this could relate to private haulage vehicles (e.g. not based at either site) being used for some trips, but further details are required to explain this.

- The average weekday peak hour trips have been estimated based on 10% of the daily trips. Whilst this percentage may be realistic, further justification is required to confirm how this percentage has been derived.
- Whilst HGV movement may reduce on the wider network due to the consolidation in warehousing at the Mirfield site, there will still be a requirement to move goods between the existing site and the proposed warehouse. Therefore, if these trips utilise the local highway network (although it would be preferable for these trips to be internalised if possible), these trips cannot be netted off from the total vehicle trips. As such, further information is required to explain these arrangements in more detail and ensure that all traffic movement are fully taken into account.

#### Vehicle Trip Distribution

Section 5.2 of the TA states that a population based gravity model has been used to assess the traffic distribution of light vehicles associated with the development. However, there is currently a lack of information to enable HDM to understand the assessment approach, with the following issues identified:

- A 'distance coefficient' has been applied, but no details are provided;
- A 'maximum travel time' has been applied, but no details are provided;
- No information on route assignment or methodology has been provided;

In light of the above, the proposed light vehicle traffic distribution is not currently accepted. It is also noted that as the development is associated with the existing John Cotton business in Mirfield, it would be more accurate if user specific staff traffic distribution was obtained, which could readily be obtained from existing staff and used to inform both the Transport Assessment and Travel Plan as recommended by good practice guidance.

Section 5.2 of the TA states that HGV traffic distribution has been based on AADT flows on the local network. This approach is considered to be somewhat flawed, as the flow of passing HGV's on the local network are unlikely to be commensurate with HGV movements to/from the site. In practice, it is expected that the vast majority of HGV traffic would utilise the Strategic Road Network (SRN), with few trips likely to be heading towards Huddersfield or Mirfield town centres (the assessment currently assumes 10% to each town centre). Given that the end user for the development is known, it is expected that HGV distribution should be well understood by the applicant. Therefore, further information should be provided to justify the HGV traffic distribution.

#### Impact on the Highway Network

Section 5.3 of the TA considers the impact of development traffic on the local highway network, by identifying the net change in vehicle trips at various junctions / links, and concludes that:

*'Overall, the anticipated changes in traffic flows related to the proposed development are of modest scale, and do not represent a significant impact in terms of the operation of the existing highway network. On this basis further detailed assessment and mitigation (in terms of physical changes to the configuration of the existing highway network) is not necessary.'*

HDM do not accept the above conclusion, as it is impossible to conclude that there would be no significant impact without undertaking any level of analysis. As such, the applicant must undertake detailed capacity assessment of the local highway network, to consider whether there would be a significant impact on the local highway network in advance of the A62 to Cooper Bridge Corridor Improvement Scheme being implemented. The scope of the detailed capacity assessment must be agreed in advance with HDM, including the following matters:

- Scope of junctions to be assessed, which would typically include any junction where there is an hourly increase above 30 two-way vehicle trips (to be established once development traffic flows/distribution have been agreed);
- Assessment year and approach to traffic growth, and including committed developments;
- Assessment time periods, which should be determined based on cumulative base/development traffic periods.

Subject to the further assessment work determining that there would not be a significant adverse impact on the safe and affective operation of local highway network, then it may be acceptable for the development to come

forward in advance of the A62 to Cooper Bridge Corridor Improvement Scheme being implemented (subject to any interim accessible improvements being delivered).

As previously stated in the Overview section of this response, it is expected that the development will provide a proportionate financial contribution to the A62 to Cooper Bridge Corridor Improvement Scheme. At this stage it is not possible to determine the exact level of contribution that will be necessary, as this would be determined by the level and distribution of traffic being generated by the development, which is yet to be agreed. However, a contribution that is commensurate with that recently secured for the Bradley Villa Farm (BVF) development (Planning Application 2021/92086) which forms part of the wider Bradley Masterplan site (Local Plan reference HS11) is appropriate. A contribution of £820,474 was secured for the BVF development, with the development generating up to 64 peak hour vehicles trips through the A62 to Cooper Bridge Corridor Improvement Scheme, which equates to £12,820 per peak hour trip.

In light of the above, and based on the worst case increase in peak hour vehicle trips that has currently been identified in the TA of 77 vehicles in the PM peak (Net trip increase as stated in Table 6), this would equate to a required contribution of **£987,140** (77 trips x £12,820 per trip). A final contribution amount will need to be agreed in due course, once the traffic assessments methodology has been fully agreed.

### **Construction Access Strategy**

A Construction Management Plan (CMP) is required for the development and should be secured by planning condition. Additionally, specific planning condition(s) should be secured relating to:

- Wheel washing facilities; and
- Highway condition surveys (pre and post construction) and remediation.

### **Planning Conditions/Section 106:**

Conditions;

- To be advised

Section 106 Contributions/Requirements;

- To be advised in due course, but including:
- A62 to Cooper Bridge Corridor Improvement Scheme Contribution – Currently estimated at £987,140 (TBC once the traffic assessments methodology has been agreed);
- Real-time Information Displays at Bus Stops 14001 and 13100 - £21,000;
- Travel Plan monitoring fee - £15,000 (£3,000 x 5yrs).

### **Conclusion:**

Further information and amendments required, see recommendation.