

**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: 16/07/25**
**Responding Officer: A Darwin**
**Responding Ref: HDC 10-2NW/1**
**RECOMMENDATION: No Objection, subject to conditions and S106 requirements (See end of the response for further details).**
**Overview:**

This outline planning application is for a new B8 Storage and Distribution development, with all matters reserved except for access. Whilst the final details and layout of the development would be agreed at the Reserved Matters stage, a B8 Storage and Distribution development of up to 28,871m<sup>2</sup> gross floor area (GFA) has been assessed. Therefore, this is the maximum level of development that is anticipated at the Reserved Matter stage and a planning condition should be imposed that caps the quantum of development and use class accordingly.

HDM provided initial comments on the development proposals on 25/10/23, which raised a number of concerns with the proposals and supporting information. Following numerous meetings with the applicants team, and the submission of additional supporting information, the principles of the development are now considered acceptable to HDM, who offer no objection, subject to conditions and S106 requirements (See end of this response for further details).

Notwithstanding the above, HDM still have remaining concerns regarding the indicative development proposals that have been presented, relating to the internal site layout, parking facilities and internal access and servicing arrangements. However, these matters can be addressed at the Reserved Matters stage, and secured by condition / S106 requirements (see further comments below relating to these specific issues). It has also been agreed with the applicant that the final details of the sites Full Travel Plan (FTP) can be secured by condition / S106 requirements.

Below is a summary of the most recent transport related information submitted by the applicant that has been assessed and forms the basis of this final HDM consultation response:

- Dwg 3633-100-P-001-G – Site Access (Cooper Bridge Road) General Arrangement;
- Dwg 3633-100-P-002-G – Site Access (Cooper Bridge Road) Engineering Layout;
- Dwg 3633-100-P-003-F – Site Access (Cooper Bridge Road) Swept Path Analysis;
- Dwg 3633-100-P-010-G – Site Access (Huddersfield Road) General Arrangement;
- Dwg 3633-100-P-011-F – Site Access (Huddersfield Road) Engineering Layout;
- Dwg 3633-100-P-012-F – Site Access (Huddersfield Road) Swept Path Analysis;
- Technical Response Note dated 29/02/24, with accompanying traffic modelling files and traffic data calculations (note the development traffic distribution in this document has been superseded by information in the Technical Note dated 14/02/25);
- Technical Response Note dated 28/03/24;
- Technical Note (TRANSYT Model Capacity Assessment) dated 14/02/25, which summarised the applicants modelling data and included minor amendment to traffic distribution assumptions (e.g. HGV traffic to turn left into Huddersfield Road access as requested by HDM).
- Independent Stage 1 Road Safety Audit (RSA) by Meraki Alliance dated 25/03/25, which was undertaken on the basis of the RSA Brief approved in advance by HDM;
- Completed Stage 1 RSA Response Report with agreed actions, which has been signed off by both Calderdale and Kirklees Council HDM Officers on 12/05/25.

The proposal site is allocated in the Kirklees Local Plan, with site reference ES9, which has an indicative capacity of 14,910m<sup>2</sup> 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 at the design and development stage, and it is proposing to submit a full planning application towards the Autumn of 2026, and to also submit a revised Outline Business Case to WYCA in the same time frame. Provided that the project can secure land without Compulsory Purchase being required, this will set the project up to submit a full business case and seek approval to proceed with construction in 2028.

The former treatment works development 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 that the development must be designed to ensure that it does not prejudice its future delivery, including the safe-guarding of land where necessary.

In light of the above, the applicant has developed their site access arrangements to ensure that they can be implemented based on the current highway arrangements, or with the emerging 'A62 to Cooper Bridge Corridor Improvement Scheme' proposals in place, to ensure that the highway improvement scheme is not prejudiced by the development proposals. The preliminary design of the developments site access arrangements and associated highway works has now satisfactorily demonstrated that the works can be accommodated in either scenario. However, close coordination will be required between the applicant and the Councils Major Projects Team, to ensure that as the design of the highway improvement scheme develops further, this is taken into account in the developments site access design (and visa versa). As such, sufficient flexibility is required in the planning condition relating to the site access proposals, to ensure that any changes required due to ongoing design development can be incorporated. As requested by the LPA, the applicant has also enlarged their redline site boundary area to ensure that there is sufficient land within the application site to accommodate any necessary changes.

It is noted that an objection has been raised by the property owner of No. 2 Leeds Road, due to their concerns that the site access proposals impact their rights to park vehicles within the boundary of No. 1 Leeds Road, which is owned by Kirklees Council. Whilst this is a private land matter that the applicant will need to resolve with the respectively landowners / rights holders, before they would be able to implement their development, the applicant has considered how alternative access / parking arrangements could be delivered for No. 1 Leeds Road. This could involve the creation of a relocated private drive access on to Cooper Bridge Road to the north of their development site access (subject to agreement with the affected parties), and a preliminary design for the private drive access has been incorporated into the wider developments site access proposals; and no problems have been raised regarding the principle of the relocated access design / location in the Stage 1 Road Safety Audit (RSA). At this stage, no design has been progressed for the revised parking and internal drive arrangements for No. 1 Leeds Road. However, the applicants redline boundary has been extended to include the full extent of No. 1 Leeds Road, which will enable these arrangements to be agreed at the Reserved Matters Stage, once agreement has been reached with the affected parties, and then implemented in conjunction with the wider development proposals.

#### **Site Access Arrangements:**

The following access arrangements are proposed:

Left in only access from Cooper Bridge Road (See Dwg 3633-100-P-001-G – Site Access (Cooper Bridge Road) General Arrangement)

The site access is proposed to replace the minor access that previously served the former treatment works site (and also serves No. 1 Leeds Road). This access has been designed to be used by both inbound HGV and light vehicular traffic, and also incorporates revised access for No. 1 Leeds Road (see earlier comments regarding deliver of this access).

Some of key issues relating to the Cooper Bridge Road access are as follows:

- The section of Cooper Bridge Road where the access is located is predominantly within the Calderdale Council highway network. Therefore, a joint S278 agreement with both Calderdale Council and Kirklees Council is likely to be required to implement the site access works. As such, Kirklees Council HDM have consulted with their counterpart at Calderdale Council regarding the site access proposals, and both Councils have agreed that the preliminary site access arrangements are acceptable. Similarly both HDM Officers have reviewed the Stage 1 Road Safety Audit and Designer Response Report that has been undertaken for these works, and have agreed the RSA Actions (which is necessary to close out the Stage 1 RSA process).
- The site access has been designed to work with the current highway arrangements and also with the wider highway improvement scheme that are currently been development. However, as previously mentioned, as the wider highway improvement scheme design develops, this may require changes to the site access design. As such, close coordination is required between the two schemes, and the planning condition that is required to secure these works needs to allow for this design progression.
- A relocated access for No. 1 Leeds Road has been incorporated into the proposals. However, no details of any internal parking / drive arrangements for the property have currently been developed, and these arrangements will need to be agree at the Reserved Matters stage. The sites redline boundary has been amended to facilitate this.
- Due to safety concerns regarding traffic potentially turning right into the access from Cooper Bridge Road, a spitter island with wand bollards has been incorporated to prevent this manoeuvre. However, due to the limited width of Cooper Bridge Road and the need to maintain adequate kerb clearances, as the road is a designated wide load route, a narrow 0.4m removable island and wand type bollards are proposed. These are not standard items, and an enhanced commuted sum for future maintenance is likely to be required (by Calderdale Council) as part of the S278 agreement. Also, to further discourage right turners into the site access, a 'No right turn' Traffic Regulation Order (TRO) with associated signing and lining is proposed. This will also be of beneficial should the removable island and bollards be absent for any reason (e.g. due to damage or if removed for wide load movement purposes). The cost associated with the TRO process will need to be funded via the S278 agreement (this would include any other new / amended TRO's that are required e.g. to parking restrictions).
- The site access works incorporate changes to the existing shared use cycle / footway along the Cooper Bridge Road frontage, with a connection then provided into the site to allow good quality cycle access arrangements for staff and visitors. The proposals have also been developed to accommodate the improvements to the pedestrian / cycle facilities that are being developed for the wider highway improvement scheme.
- Given that the private access is for inbound traffic only, there is a risk that traffic not associated with the development could inadvertently enter the access and then be unable to exit the site due to the one-way arrangement. Therefore, it will be necessary for the development to allow vehicles that have entered the access to circulate through the site and exit via the proposed Huddersfield Road access. These requirements should be secured within the S106 agreement, and within the internal layout that is to be agreed at the Reserved Matters stage. The S106 agreement should also include a requirement for the development to close the site access (with design/works to be agreed with the LPA), should the site cease to operate.
- A full package of junction visibility information and swept path analysis has been provided, which confirms that junction will be able to accommodate the proposed use, and has been independently reviewed as part of the Stage 1 RSA process.

#### Upgraded access on Huddersfield Road

The proposed Huddersfield Road site access involves upgrading the existing all movements access to the water treatment works site, which is currently used for parking associated with the existing John Cottons site immediately to the east, as well as the retained Yorkshire Water facilities to the east of the development site.

Some of key issues relating to the access are as follows:

- The access has been designed to facilitate left turn in and out movements only. This is due to the close proximity of the traffic signal controlled junction to the west of the access, to ensure that conflicting right turn movements do not affect the safe operation of the junction. To prevent right turn movements to/from the access, a physical island is proposed on Huddersfield Road. As requested by the Council highway Safety Team, a 'No U-turn' Traffic Regulation Order (TRO) with associated signing and lining is

proposed at the eastern end of the traffic island to prevent drivers from u-turning to gain access to the site. The costs associated with the TRO process will again need to be funded via the S278 agreement (this would include any other new/amended TRO's that are required e.g. to parking restrictions).

- As requested by HDM, the applicant has designed the access to accommodate HGV traffic for both the inbound and outbound movements. This is to ensure that inbound HGV's from the east on Huddersfield Road (including those arriving from the adjacent John Cotton site) will enter the site from this access, rather than the Cooper Bridge road access, as this will ensure that unnecessary traffic movements are avoided at Cooper Bridge Roundabout.
- As outbound movements will be restricted to left only, development traffic wishing to head east on Huddersfield Road (or Leeds Road) will need to undertake a u-turn at Cooper Bridge Roundabout. The Council's UTMC Team had some initial concerns on how this may affect the operation of this signalised roundabout junction. However, following their own sensitivity test traffic modelling, they have concluded that it would not have a significant adverse impact on the junction operation. It is also noted that the wider highway improvement scheme is being developed to accommodate these manoeuvres.
- To accommodate the site access arrangements, relatively minor changes are required to the existing John Cotton site to the east. The details of these consequential changes can be agreed as part of the Reserved Matters proposals, and the site's redline boundary has been amended to facilitate these changes. The applicant has also been requested to consider how traffic movements between the development site and the existing John Cotton site could be 'internalised' to minimise unnecessary trips on the local highway network. The applicant has advised that access between the sites is unlikely to be possible. However, it is requested that this is considered further at the Reserved Matters stage, with a pedestrian and cycle link provided between the sites as a minimum.
- As part of the site access proposals, it is also proposed to provide a new Toucan crossing facility at the existing traffic signals immediately to the east, to allow pedestrians and cyclists to cross Huddersfield Road, and to facilitate access to/from Huddersfield Road and Leeds Road (via Stocks Bank Road for outbound cycle movements from the site), and enable safe access to the bus stops on these roads. The Toucan crossing has been designed to align as closely as possible with the wider highway improvement scheme that is being developed and that also includes this facility, with the aim of minimising any abortive works. However, some changes will be required to the southern kerb lines, as it is not feasible to design the site access arrangements that fully align with both the current and future highway alignment (which is still subject to further design development). Therefore, it is reiterated that close coordination is required between the two schemes, and the planning condition that is required to secure the site access works needs to allow for this design development.
- As there are no controlled pedestrian crossing facilities currently on Leeds Road to the north of the site access, a new pedestrian refuge island is proposed, which will facilitate pedestrian access along Leeds Road and to the existing bus stops. It is noted that this is likely to be a temporary feature, as controlled crossing facilities are likely to be provided on Leeds Road as part of the wider highway improvement scheme.
- A shared cycle/footway is proposed along the west side of the site access, which will connect directly to the new Toucan crossing facilities proposed on Huddersfield Road.
- A Stage 1 Road Safety Audit and Design Response Report have been provided, and HDM have agreed the RSA Actions, to close out the stage 1 RSA process.
- A full package of junction visibility information and swept path analysis has been provided, which confirms that junction will be able to accommodate the development, and this has been independently reviewed as part of the Stage 1 RSA process.

#### **Accessibility:**

In HDM's previous consultation response, concerns were raised regarding the current accessibility of the proposals, which had also been raised by WYCA and ATE. Whilst it was acknowledged that 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 current accessibility issues on the local network. This included a lack of safe pedestrian/cycle crossing facilities on either Cooper Bridge Road or Huddersfield Road, including a lack of facilities to allow access to nearby bus stops.

The applicant's proposals now include a controlled crossing (Toucan) on Huddersfield Road that will be linked to the site via a shared use cycle/footway, and a new pedestrian refuge island on Leeds Road. These facilities will assist active travel users to/from the site, and provide improved crossing facilities to the nearest bus stops to the

site on Leeds Road and Huddersfield Road. Therefore, it is considered that the proposed works are acceptable as interim measures, in the advance of the wider improvements that will be delivered by the A62 to Cooper Bridge Corridor Improvement Scheme (to which a financial contribution is sought to this scheme from the development – see further comments below).

As confirmed in HDM's previous consultation response, WYCA have requested that funding be provided by the development, to enable real-time information (RTI) displays to be installed at the nearest accessible bus stops to the site. WYCA / HDM previously suggested that these real-time displays should be provided at the bus stops on Cooper Bridge Road, due to the current lack of pedestrian crossing facilities to more closer bus stops. However, as pedestrian crossing facilities are now proposed on Huddersfield Road and Leeds Road, development users will now be able to safely access the northeastbound stop on Leeds Road. As such, HDM have reconsulted with WYCA, who have agreed that the best locations to install the RTI displays are at Stops 11851 (northeastbound stop on Leeds Road, to the north of the site) and 13099 (southwestbound stop on Leeds Road, adjacent to Cooper Bridge Roundabout). The current cost of these two RTI displays is **£22,000 (2x£11,000)**, which should be secured via S106 agreement.

In HDM's previous consultation response, it was requested that the applicant explore opportunities to provide a pedestrian/cycle link through the site to the east to connect to the existing routes adjacent to the River Calder and the Calder and Hebble Navigation Battye Cut, which then lead towards Wood Lane and the NCN 66 Calder Valley Greenway beyond. However, the applicant has confirmed that they do not have sufficient control of the retained waste water treatment works site to the east of the application site to facilitate the link, and do not wish to see a publicly accessible path through their site, due to potential health and safety implications. HDM acknowledge that there are land ownership issues that currently preclude the link, and accept the applicants position on this matter.

#### **Travel Plan:**

As identified in the previous HDM's consultation response, the Travel Plan submitted in support of the proposals is not currently acceptable. However, it has been agreed with the applicant that the final details of the Travel Plan, and the associated measures, can be secured by condition and S106 requirements (including Travel Plan Monitoring fee).

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), which should be secured via S106 agreement.

#### **Highway Safety:**

Following the improvements made to the site access proposals, which now incorporate pedestrian/cycle crossing improvements, the previous concerns raised regarding highway safety matters associated with the site access proposals have been adequately addressed.

As highlighted in the previous HDM response, the Councils Road Safety Team have 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 off-street car parking is available for all development users, to ensure that these problems are not exacerbated by the development. Furthermore, the proposed development provides an opportunity to improve the parking facilities for the wider John Cotton site. Therefore, these issues need to be taken into account at the Reserved Matters Stage, to ensure that adequate parking for all development users is accommodated, and potentially addresses any existing shortfall in provision (see further comments below relating to car parking). A Parking Management Plan (PMP) should also be secured by condition, which includes details of the on-site parking arrangements and management, together with agreed measures to address any problems that may occur (e.g. additional 'no waiting' restrictions or other parking management measures may be required on the highway, and funded by the development).

**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, the level of parking that is likely to be achievable on site does not currently appear to be adequate to serve the development, based on the very large building footprint that is currently being envisaged. To put this into context, the indicative masterplan drawing indicates circa 154 car parking spaces. However, based on 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 95m<sup>2</sup>. 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, particular during shift change periods, and further space within the site may need to be safeguarded for this purpose (or a decked parking arrangement may be an option). Alternatively, the proposed development floor area may need to be reduced.

As requested in the previous HDM response, the applicant needs to 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. As this information has not been provided, this information will need to be provided as part of the Reserved Matters planning submission, with the proposed parking levels (for all modes) and layout secured by planning condition. The supporting information will need to include existing parking (both on and off site) and travel mode data for existing staff, and an assessment of future demand based on empirical data. This information will also be required to inform the required Parking Management Plan (PMP) that should be secured by condition, as previously identified.

The proposed car parking must 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.

**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. These proposals will need to be designed to ensure that the site security and internal access arrangements safely manage the interaction between service vehicles and other users (either staff or other traffic that may have inadvertently entered the site). The proposals should also be designed to minimise the need for vehicle movements on the highway between the existing and proposed John Cotton sites. A Service Management Plan (SMP) should also be secured by condition.

**Traffic Impact Assessment:**

HDM previously raised concerns with the traffic impact assessment methodology that had been used in the original Transport Assessment (TA) submitted in support of the proposals, which had not been agreed in advance with HDM.

These issues have now been satisfactorily addressed through the submission of additional data, and traffic modelling that has been reviewed by HDM in consultation with the Councils UTMC team.

A summary of the agreed assessment approach and findings of its findings are as follows:

Traffic Generation and Distribution

**Total Vehicle Trip Generation (Source: TRICS Database - Employment(02), Warehouse(F)):**

Hour Start		Vehicle Trip Rates			Vehicle Trips		
		Arr	Dep	Tot	Arr	Dep	Tot
AM Peak	07:00 - 08:00	0.166	0.129	0.295	46	36	82
	07:30 - 08:30	0.153	0.107	0.260	43	30	72
	08:00 - 09:00	0.154	0.105	0.259	43	29	72
	08:30 - 09:30	0.138	0.092	0.230	38	26	64
	09:00 - 10:00	0.096	0.077	0.173	27	21	48
PM Peak	16:00 - 17:00	0.101	0.161	0.262	28	45	73
	16:30 - 17:30	0.101	0.201	0.302	28	56	84
	17:00 - 18:00	0.120	0.213	0.333	33	59	93
	17:30 - 18:30	0.100	0.126	0.226	28	35	63
	18:00 - 19:00	0.114	0.096	0.210	32	27	59

**HGV Trip Generation (Source: TRICS Database - Employment (02), Warehouse (F)):**

Hour Start		Vehicle Trip Rates			Vehicle Trips		
		Arr	Dep	Tot	Arr	Dep	Tot
AM Peak	07:00 - 08:00	0.044	0.065	0.109	12	18	30
	07:30 - 08:30	0.036	0.069	0.105	10	19	29
	08:00 - 09:00	0.049	0.067	0.116	14	19	32
	08:30 - 09:30	0.048	0.064	0.112	13	18	31
	09:00 - 10:00	0.044	0.051	0.095	12	14	26
PM Peak	16:00 - 17:00	0.070	0.051	0.121	20	14	34
	16:30 - 17:30	0.068	0.042	0.110	19	12	31
	17:00 - 18:00	0.074	0.048	0.122	21	13	34
	17:30 - 18:30	0.054	0.042	0.096	15	12	27
	18:00 - 19:00	0.046	0.027	0.073	13	8	20

The above trip rates and associated weekday peak hour vehicle trip generations, which have been identified from the TRICS database, are acceptable (note that the HGV Trips are included in the Total Vehicle Trips and are not additional vehicle trips).

As set out in the original TA, 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, are proposed to transfer/divert to the new facility. This will have operational benefits for the applicant, and help to reduce HGV trips numbers and journey length on the wider highway network. These transferred/diverted trips have been taken into account in the assessment (as shown on Figures 14-21 of the TRANSYT Model Capacity Assessment dated 14/02/25), and results in the net increase in development traffic reducing to 61 and 69 vehicles in the AM and PM weekday peak hour periods respectively, entering into the TRANSYT Model study network (e.g. the Cooper Bridge Roundabout and A644/A62 signalised junctions, which are to be improved as part of Phase 1 of the 'A62 to Cooper Bridge Corridor Improvement Scheme', with these figures based on the inbound flows to the study network shown on Figures 22-23 of the TRANSYT Model Capacity Assessment dated 14/02/25).

The traffic distribution for light vehicles and new/diverted/transferred HGV trips, as well as the committed development and traffic growth assumptions that have been utilised within the TRANSYT Model Capacity Assessment dated 14/02/25 are acceptable.

### Impact on the Highway Network

The applicant's consultant has provided a number of iterations of TRANSYT modelling for the agreed study area, which includes Cooper Bridge Roundabout and the A644/A62 signalised junction, with their final assessment information contained in their 'TRANSYT Model Capacity Assessment' report dated 14/02/25.

The applicants report concludes that:

- *'Several key links within both the Cooper Bridge roundabout and A62 Leeds Road / A644 Huddersfield Road junction currently operate beyond capacity in the 2022 Base scenario, in both the weekday AM and PM peak hours.*
- *Both the 2028 Do Minimum and 2028 With Development scenarios are also predicted to be associated with overcapacity links, in both the weekday AM and PM peak hours.*
- *While queuing on Leeds Road is expected to increase, there is generally no significant increase in the DoS values and associated queues between the 2028 Do Minimum and 2028 With Development scenarios.*
- *On this basis, it is concluded that changes in traffic flows associated with the proposed development can be satisfactorily accommodated by the Cooper Bridge roundabout and A62 Leeds Road / A644 Huddersfield Road junction.'*

The Council UTMC Team have reviewed the traffic modelling work in detail, with a summary of their findings as follows:

- The traffic model is limited to the two main signalised junction within the immediate vicinity of the site. Therefore, the model only forms part of a wider traffic scenario and so is not full representative of current traffic conditions. This includes some under-estimation of the extensive queuing that occurs at peak times on some approaches. As such, the Councils UTMC Team have extended the applicants model to enable additional journey time data to be utilised to better validate the model. Based on this additional data and extended model, this gives reassurance that the amended model provides a fair representation of site conditions.
- Some concerns were initially raised regarding the impact on additional u-turning development traffic at Cooper Bridge roundabout (required due to the movement restrictions at the development site access and at the A644/A62 junction). The Councils UTMC team have undertaken further sensitivity testing, and have concluded that the U-turn movements do not severely affect the operation of the roundabout during the course of the modelled hour.
- In summary, the Councils UTMC Team have concluded that: *'The conclusion reached is that the planning application brings changes to traffic movements in and out of the John Cotton site, but this is manageable.'*

In light of the above, it is concluded that whilst the development will have an adverse impact on the operation of the local highway network, which is already operating over capacity at peak times, the impact of the development is not considered to be severe.

Notwithstanding the above, as identified in the previous HDM consultation response, it is expected that the development will provide a proportionate financial contribution to the 'A62 to Cooper Bridge Corridor Improvement Scheme'. A financial contribution that is commensurate with that secured for the Bradley Villa Farm 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 in the S106 signed in August 2023, with the development generating up to 64 peak hour vehicles trips through the A62 to Cooper Bridge Corridor Improvement Scheme, which equated to £12,820 per peak hour trip. Based on index linking of 5.4% (based on August 23 – May 23 CPI data) to take account of inflation since this previous financial contribution was agreed, an equivalent proportionate cost of £13,512 per peak hour trip is appropriate for this B8 development.

Based on the above, and the worst case increase in peak hour vehicle trips that has been identified through the study network of 69 vehicles in the PM peak (as identified above, this is based on the inbound network flows

from Figure 23 of the TRANSYT Model Capacity Assessment report dated 14/02/25), this would equate to a required contribution of up to £932,328 (69 vehicle trips x £13,512 per trip).

However, as the development proposals are currently at the outline planning stage, it may be that a smaller building may be proposed at the Reserved Matters stage, which could be expected to have a proportionate reduction in traffic impact. As such, it is proposed that the final contribution is determined once the size of the building has been fixed. Therefore, it is recommended that the required financial contribution is secured based on a calculation using the final GFA of the new building that is proposed at the Reserved Matters Stage. By applying the above total contribution of £932,328 based on the GFA currently envisaged (and used for traffic assessment purposes) of 28,871m<sup>2</sup> GFA, this would equate to a contribution of **£3,229 Per 100m<sup>2</sup> of B8 GFA.**

The above contribution (**£3,229 per 100m<sup>2</sup> GFA**) should be secured by Section 106 agreement, which should be index linked (CPI). The level of development proposed at the Reserved Matters stage should also be capped at a maximum of 28,871m<sup>2</sup> of B8 use, which should be secured by planning condition.

### Construction Access Strategy

A Construction Traffic Management Plan (CTMP) is required for the development and should be secured by planning condition. Additionally, a planning condition is required that secures Highway condition surveys (pre and post construction) and remediation.

### Conclusion

No Objection, subject to conditions and S106 requirements (See below).

### Recommended S106 requirements:

- Accommodation of safe and efficient public vehicular access through the site, to enable traffic that has inadvertently entered the site via the Cooper Bridge Road access to safely exit the site via the Huddersfield Road access for the lifetime of the development. Should the development cease to operate, the site owner will also need to implement measures to prevent access through the site that has been agreed in advance with the Local Planning Authority.
- 'A62 to Cooper Bridge Corridor Improvement Scheme' Financial Contribution of £3,229 per 100m<sup>2</sup> of GFA, up to a maximum contribution of £932,328 based on the maximum GFA of 28,871m<sup>2</sup>. The contribution to be provided upon occupation, to be retained for a minimum of 10 years and be index linked (CPI).
- Real-time Information (RTI) Displays at Bus Stops 11851 and 13099 - £22,000;
- Travel Plan monitoring fee - £15,000 (£3,000 x 5yrs).

Recommended Planning Conditions and informatives:

### Reserved Matters – Condition

It is understood that a 'Reserved Matters' condition will be imposed that secures all matters not determined at this outline planning stage (e.g. all matters except for access). Therefore, the following items relating to highways / transportation matters should be secured by this condition:

- Scale;
- Layout;
- Means of access (including pedestrian and cycle access into and within the site, and vehicular access within the site);
- Parking (for all modes);
- Servicing facilities and routes;
- Security arrangements, including any access barriers;
- Revised parking / drive arrangements for No. 1 Leeds Road.

Development Quantum - Condition

*The floorspace of all of the development hereby approved shall comprise B8 Storage and Distribution use, and shall not exceed 28,871m<sup>2</sup> Gross Floor Area (GFA).*

*Reason: To limit impacts upon amenity and to ensure the assessments of traffic generation remain robust.*

Approved Access – Condition

*Means of access to and from the site and the associated works shall be in accordance with the preliminary access design(s) shown on the approved plan(s) ref. 3633-100-P-001-G, 3633-100-P-002-G, 3633-100-P-010-G and 3633-100-P-011-G, or as otherwise agreed in writing by the Local Planning Authority. The works shall include:*

*Entry only access from Cooper Bridge Road, which includes:*

- *Measures to prevent right turn movements into the access;*
- *Measures to prevent parking or loading within the vicinity of the access;*
- *Cycle track/footway improvements;*
- *Works to accommodate the future A62 to Cooper Bridge Corridor Improvement Scheme;*
- *Replacement access for No. 1-2 Leeds Road.*

*Left turn only access on Huddersfield Road, which includes:*

- *Measures to prevent right turn movements into and out of the access, including U-turn movements on Huddersfield Road;*
- *Measures to prevent parking or loading within the vicinity of the access;*
- *Cycle track/footway improvements;*
- *Works to accommodate the future A62 Cooper Bridge Corridor Improvement Scheme;*
- *Amendments to the existing site access and parking arrangements to accommodate the upgraded site access;*
- *New Toucan crossing facilities on Huddersfield Road and associated works;*
- *New pedestrian crossing refuge island and associated works on Leeds Road.*

*The approved access works shall be fully constructed and made operational prior to first occupation of the development and thereafter retained and maintained for the lifetime of the development.*

*Reason:- To ensure the free and safe use of the highway, in the interest of highway safety.*

Approved Access – Informative

*The granting of planning permission does not authorise the carrying out of works within the highway, for which the written permission of the Local Highway Authority is required.*

*You are required to consult the Local Highway Authority Design Engineer (Kirklees Street Scene: 01484 221000) at the earliest opportunity in the development process to obtain approval of the design details, agree the mechanism for delivery, and obtain the necessary permissions / permits to enable the delivery of the site access(es).*

*This process will involve entering into a 278 agreement of the Highways Act 1980 or other appropriate agreement to enable delivery of the works. The applicant is advised to make early contact with the Local Highway Authority Design Engineer, to ensure that the delivery of the works does not delay occupation of the development. It is also noted that due to the site access proposals also affecting the Calderdale Council highway network, a joint agreement(s) is likely to be required to deliver the works that could increase the delivery timescales.*

*Please also note that the construction of vehicle crossings within the highway is deemed to be major works for the purposes of the New Roads and Street Works Act 1991 (Section 84 and 85). Interference with the highway without such permission is an offence which could lead to prosecution.*

#### Internal Access Arrangements - Condition

*Notwithstanding the indicative details submitted to date, prior to the commencement of development (including ground works) of the development hereby approved, a scheme detailing the internal vehicle and pedestrian route(s) through and within the site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include full design details, including sections, drainage details, street lighting, signing, surface finishes and the treatment of sight lines, together with details of the delivery of the scheme and the provision of public access throughout the life of the development. The development hereby approved shall not be brought into first use until the internal routes have been completed in accordance with the details so approved, unless otherwise agreed in writing by the Local Planning Authority.*

*Reason: In the interests of highway safety and amenity and to achieve a satisfactory layout.*

*This pre-commencement condition is necessary to ensure that details of the internal routes are agreed at an appropriate stage of the development process.*

#### Delivery and Servicing Management Plan (DSMP) - Condition

*Prior to the commencement of superstructure works, a Delivery and Servicing Management Plan (DSMP) shall be submitted to and approved in writing by the Local Planning Authority. The DSMP shall include as a minimum:*

- *A strategy for the use of the developments servicing areas and individual access points, for the management of HGV movements and other traffic, to minimise impacts on the local highway network and to include details of the site access security/barrier arrangements that ensure that blocking back to the site access junctions and highway will not occur;*
- *Details of servicing facilities at the site, including the access, turning and yard arrangements;*
- *Details of on-site servicing procedures;*
- *Details of the delivery driver procedures, including measures to ensure that HGV parking does not occur on the highway;*
- *Details of on-site holding area(s) for waiting vehicles;*
- *Details of the driver welfare facilities;*
- *Monitoring and review procedures;*
- *Details of the remedial measures that may be required to address any highway safety or operational issues.*

*The development shall be occupied and operated strictly in accordance with the DSMP so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority.*

*Reason: In the interests of highway safety and mitigating the impacts of the development, to accord with Policies LP20 and LP21 of the Kirklees Local Plan and the National Planning Policy Framework.*

#### Parking Management Plan (PMP) - Condition

*Prior to the commencement of superstructure works, a Parking Management Plan (PMP) shall be submitted to and approved in writing by the Local Planning Authority. The PMP shall include as a minimum:*

- *A strategy for the use of the developments access, parking and drop-off areas that demonstrates how the impact of the development on the highway will be minimised at all times, including at peak periods and during shift changeovers. The strategy shall include measures that ensure that no overspill parking or drop-off associated with the development will take place on the highway and ensures that queuing or waiting traffic does not block the highway;*
- *Details of the parking, drop-off and access arrangements that accommodate the needs of all development users, including supporting evidence that demonstrates that the facilities are adequate;*
- *Monitoring and review procedures; and*
- *Details of the remedial measures that may be required to address any highway safety or operational issues.*

*The development shall be occupied and operated strictly in accordance with the PMP so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority.*

*Reason: In the interests of highway safety and mitigating the impacts of the development, in accordance with Policies LP20 and LP21 of the Kirklees Local Plan and the National Planning Policy Framework.*

Full Travel Plan (FTP) - Condition

*Six months prior to the first occupation of the development hereby approved, a Full Travel Plan (FTP) shall be submitted to and approved in writing by the Local Planning Authority. The FTP shall include as a minimum:*

- *The appointment of a Travel Plan Co-ordinator;*
- *The identification of objectives and targets for trip reduction and modal shift;*
- *Measures to be implemented to meet the objectives and targets;*
- *A timetable / phasing of the implementation of the FTP measures and its operation thereafter;*
- *Mechanisms for monitoring and review for the five-year formal monitoring period;*
- *Mechanisms for reporting, review and agreement of annual action plans;*
- *Remedial measures to be applied in the event that targets are not met; and*
- *Mechanisms for securing variations to the FTP following monitoring and reviews.*

*The completed development shall be occupied and operated in accordance with the approved FTP for the life of the development unless otherwise agreed in writing by the Local Planning Authority.*

*Reason: To ensure staff and visitors to the development are encouraged to use sustainable forms of transport and to mitigate the highway and air quality impacts of the development in accordance with the Kirklees Local Plan, National Planning Policy Framework and the West Yorkshire Low Emissions Strategy.*

EV Charging Facilities - Condition

See Environmental Health Consultation Response for suggested condition / footnote wording (EVC1/EVF1).

Cycling Facilities – Condition

*Prior to the commencement of superstructure works, a scheme detailing the provision of covered and secure cycle parking, together with electric cycle charging, locker, shower and changing facilities for cyclists shall be submitted to and approved in writing by the Local Planning Authority. The use hereby approved shall not commence until the cycling facilities have been installed in accordance with the details so approved, and shall thereafter be retained.*

*Reason: In the interests of encouraging the use of sustainable transport modes, and to accord with the Kirklees Local Plan.*

Construction Traffic Management Plan (CMP) - Condition

*Prior to the commencement of development (including ground works), a Construction Traffic Management Plan (CTMP) shall be submitted to and approved in writing by the Local Planning Authority. The CMP shall include as a minimum details of:*

- *Any phasing of development and timetable of works;*
- *Hours of works;*
- *Details of construction access arrangements and signage;*
- *Construction vehicle sizes and routes (with swept path analysis testing if necessary);*
- *Numbers and times of construction vehicle movements, which shall wherever possible, minimise HGV movements during network peak periods, with the exception of abnormal load movements and/or continuous concrete pours;*
- *Locations of HGV waiting areas and details of their management;*
- *Details of parking for construction workers (including vans);*
- *Loading and unloading of plant and materials;*
- *Measures to be taken to minimise the deposit of mud, grit and dirt on public highways by vehicles travelling to and from the site, including the provision of adequate wheel washing facilities within the site;*
- *Street sweeping arrangements;*
- *Site manager and liaison officer contact details, including details of their remit and responsibilities.*

*The development shall be carried out strictly in accordance with the CMP so approved throughout the period of construction and no change therefrom shall take place without the prior written consent of the Local Planning Authority.*

*Reason: In the interests of amenity, to ensure the highway is not obstructed, in the interests of highway safety, and to accord the Kirklees Local Plan.*

*This pre-commencement condition is necessary to ensure measures to avoid obstruction to the highway network and to avoid increased risks to highway safety are devised and agreed at an appropriate stage of the development process.*

#### Highway Condition Surveys and Remediation - Condition

*Prior to the commencement of the development hereby approved (including ground works) a survey of the existing condition of the highway (the extent of highway to be surveyed to be agreed with the Local Planning Authority in advance) shall be carried out and submitted to and approved in writing by the Local Planning Authority. The survey shall include carriageway and footway surfacing, verges, kerbs, edgings, street lighting, signing and white lining. Upon completion of the development hereby approved (or at any earlier stage to be agreed with the Local Planning Authority in advance) a post-construction survey of the agreed extent of highway shall be carried out and the post construction survey and a scheme of remedial works shall be submitted to and approved in writing by the Local Planning Authority. The approved remedial works shall be carried out following the completion of all construction works related to the development and prior to the occupation of the development hereby approved unless otherwise agreed in writing by the Local Planning Authority. Should any highways defects (affecting highway safety) attributable to the construction traffic of the development hereby approved be identified during the construction period, remediation of these shall also be implemented in accordance with details to be submitted to and approved in writing by the Local Planning Authority.*

*Reason: In the interests of highway safety, to ensure the effective maintenance of the highway and to accord with Policy LP21 of the Kirklees Local Plan.*

*This pre-commencement condition is necessary to ensure highways surrounding the site are appropriately surveyed prior to works commencing, and to ensure responsibility for remedial works can be fairly assigned with reference to evidence.*

#### Highway Structures - Condition

*Where highway retaining structures and/or private structures within close proximity of the highway are necessary, prior to development commencing on the superstructure of the development hereby approved, the design and construction details of any such structures (and any temporary highway retaining structures that may be deemed necessary) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include a design statement, all necessary ground investigations on which design assumptions are based, method statements for both temporary and permanent works and removal of any bulk excavations, together with structural calculations and all associated safety measures for the protection of adjacent public highways, footpaths, culverts, adjoining land and areas of public access. The development shall be completed in accordance with the approved details before any part of the development is first occupied and shall be retained as such thereafter.*

*Reason: To ensure that any new retaining structures do not compromise the stability of the highway in the interests of highway safety and to accord with Policy LP21 of the Kirklees Local Plan.*