

# Technical Response Note

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## 1 Introduction

Fore Consulting Limited (Fore) is instructed by John Cotton Group Ltd to assist an outline planning application for a proposed warehouse development on the former Cooper Bridge Waste Water Treatment Works, near Mirfield, Kirklees, in respect of transport and highways matters. The commission included the preparation of a Transport Assessment and Travel Plan submitted with the planning application to Kirklees Council<sup>1</sup>.

This note provides a technical response to a consultation by Kirkless Council's Highways Development Management (HDM) team on the planning application, dated 25 October 2023, specifically in relation to points raised regarding the proposed access arrangements. It is structured based on the Council's consultation, for cross-referencing purposes.

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<sup>1</sup> Planning application reference 2023/92448



## 2 Response to Points Raised

Kirklees Council Comment	Fore Response
<b>In Only Access on Cooper Bridge Road</b>	
<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>Noted and accepted.</p> <p>The proposed arrangements have been amended to discourage right turn manoeuvres into the access, as far as practicable.</p> <p>The arrangements are demonstrated on Fore drawing 3633/100/P001A accordingly.</p> <p>Although based on Cooper Bridge Road as existing, the proposed access arrangement is in line with the arrangements discussed with the Council's Major Projects team progressing the wider Cooper Bridge Improvement Scheme. It is understood that the proposed access arrangements are to be incorporated in the emerging Improvement Scheme 'as existing' based on the likelihood that the development proposed by John Cotton Group Ltd will come forward in advance of the Council's Improvement Scheme, which is subject to detailed design and preparation of a satisfactory business case (as part of the WYCA approvals process for release of funding).</p>
<p><i>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.</i></p>	<p>Provision for such a TRO and related signage is indicated within the revised arrangements.</p>
<p><i>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</i></p>	<p>The revised arrangement incorporates the identified provisions.</p> <p>The minor arm is widened to 6.0m width, to allow vehicles to pass should this be necessary. The swept path of passing vehicles in this way is demonstrated on Fore drawing 3633/100/P003A.</p>
<p><i>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.</i></p>	<p>The revised arrangement allows for an uncontrolled crossing of the access road.</p>
<p><i>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</i></p>	<p>To define the extent of land necessary to accommodate visibility requirements at the proposed access, a traffic speed survey was commissioned on Cooper Bridge Road immediately south of the existing Cooper Bridge Roundabout by</p>



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<p><i>planning application will need to be amended (HDM have already identified this matter to the Planning Officer).</i></p>	<p>means of an automatic radar survey, over 7 consecutive days commencing Tuesday 30 January. This confirmed 85<sup>th</sup> percentile vehicle speeds of 33mph on Huddersfield Road.</p> <p>Relating the surveyed traffic speeds to the relevant DMRB guidance, Fore drawing 3633/100/P002A demonstrates a forward visibility envelope of 90m, which represents the extent of land within the Council’s ownership required to deliver the access. This matter is subject to wider discussion between the applicant team and the Council as part of the planning application.</p>
<p><i>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.</i></p>	<p>The proposed ‘in only’ arrangements have been shared with the Major Projects team and (in principle) are incorporated in the emerging scheme, subject to further detailed design and preparation of a satisfactory business case (as part of the WYCA approvals process for release of funding).</p>
<p><i>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).</i></p>	<p>The revised arrangements and details requested are demonstrated on Fore drawings 3633/100/P001A to and 3633/100/P003A.</p> <p>Swept path analysis assumes a vehicle speed of 30mph, reducing to 20mph when passing a vehicle parked on the access road Such speeds are suitable given the nature of the proposed access road.</p>
<p><i>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.</i></p>	<p>Noted. Confirmation is requested that the proposed arrangements are accepted for the purposes of a Stage 1 RSA.</p>
<p><b>Upgraded Access on Huddersfield Road</b></p>	
<p><i>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.</i></p> <p><i>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.</i></p> <p><i>Following consultation with the Councils Road Safety team, significant concerns have been raised regarding right turning</i></p>	<p>Revised arrangements are demonstrated on Fore drawing 3633/100/P010. This comprises an extended physical island on Huddersfield Road to preclude the ability of vehicles to turn right into the site, and allow ‘left in, left out’ movements only. The impact of this on the operation of the existing Cooper Bridge roundabout is assessed in the highway modelling work submitted to the Council under separate cover.</p> <p>Although based on Huddersfield Road as existing, the proposed access arrangement is in line with the arrangements discussed with the Council’s Major Projects team progressing the wider Cooper Bridge Improvement Scheme. It is understood that the proposed access arrangements are to be incorporated in the emerging Improvement Scheme ‘as existing’ based on the likelihood that the development proposed by John Cotton Group Ltd will come forward in advance of the Council’s Improvement Scheme, which is subject to detailed design and preparation of a satisfactory business</p>



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<p><i>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.</i></p> <p><i>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).</i></p>	<p>case (as part of the WYCA approvals process for release of funding).</p> <p>In addition, as discussed with the Council's HDM officer, the feasibility of introducing signalised pedestrian crossings on Huddersfield Road as part of the arrangement has been considered.</p> <p>The arrangement demonstrated allows for introduction of signalised crossings; however, it is not considered feasible to introduce an additional stopline for eastbound traffic at the crossing. Such traffic is to be managed at the existing stopline on Leeds Road, as under the existing arrangement.</p> <p>To do so, it would be necessary to relocate the crossing east along Huddersfield Road, which is not considered desirable for the following reasons:</p> <ul style="list-style-type: none"> <li>• At this location, sufficient width for the central island to allow for pedestrian usage cannot be readily incorporated without narrowing the width of the eastbound and westbound carriageways. This is not considered appropriate given the nature and use of Huddersfield Road at this point.</li> <li>• In addition, moving the crossing of the eastbound carriageway east in this way would introduce a considerable stagger between the respective crossings, which would not suit the desire line of potential crossing users, and increase the likelihood of undesirable use of the crossings by pedestrians.</li> </ul> <p>Consequently, the arrangement identified best balances the constraints in the immediate vicinity to provide a signal-controlled crossing on Huddersfield Road.</p>
<p><i>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 substandard. 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.</i></p>	<p>An automatic traffic count survey was commissioned to collect traffic speed data over 7 consecutive days commencing Tuesday 30 January. This confirmed 85<sup>th</sup> percentile vehicle speeds of 30.8mph on Huddersfield Road, approaching the proposed access junction. Relating this to DMRB guidance, such speeds equate to a desirable minimum stopping sight distance of 70m.</p> <p>By nature of using 85<sup>th</sup> percentile speeds to establish visibility requirements, it follows that a proportion of vehicles in practice travel faster than the 85<sup>th</sup> percentile speed recorded. Taking into account speeds observed at certain times of day (eg overnight) when traffic flows are lower, and therefore speeds are naturally higher, it is proposed that warning signage to indicate the location of the proposed access is provided. Effectively this mitigates the observed speeds higher than the 85<sup>th</sup> percentile, and allows visibility to be provided a level that is 'one step below the desirable minimum'.</p> <p>The resulting visibility splays of 2.4m x 70m are achievable within the existing extent of public highway and land controlled by the applicant.</p>



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<p><i>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.</i></p>	<p>The revised arrangements incorporate the existing cycle lanes on Huddersfield Road around the proposed access. Cyclists approaching from the east have the option of using the proposed access road to access the development, and cyclists approaching from the west (via Cooper Bridge Road) and north (via Leeds) would have the option of using the Cooper Bridge Road access, which provides a suitable route to the development.</p>
<p><i>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).</i></p>	<p>The revised arrangements and details requested are demonstrated on Fore drawing 3633/100/P010.</p>
<p><i>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.</i></p>	<p>Noted. Confirmation is requested that the proposed arrangements are accepted for the purposes of a Stage 1 RSA.</p>
<p><b>General</b></p>	
<p><i>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.</i></p>	<p>It is anticipated that security gates will be utilised, and that these will allow for management of traffic that may inadvertently use the access road to exit through the site onto Huddersfield Road.</p>
<p><i>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.</i></p>	<p>The proposed access from Cooper Bridge Road effectively discourages this, by requiring traffic to turn from Cooper Bridge Road into the site. An option which provided a longer diverging lane was identified, though it was discounted given that it could imply the availability of 2 lanes on Cooper Bridge Road, introducing driver confusion and potentially increase the number of vehicles accessing the site inadvertently.</p>
<p><i>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?</i></p>	<p>The specific internal layout of the development will be addressed as part of a future application for reserved matters.                      Notwithstanding this, the submitted illustrative masterplan demonstrates an internal access road through the site that is separate from turning areas and HGV parking, which suitably manages such conflicts.</p>
<p><i>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.</i></p>	<p>The specific internal layout of the development will be addressed as part of a future application for reserved matters.                      Notwithstanding this, the submitted illustrative masterplan allows for the retained treatment works to be accessed from the internal access road though the site. Such access will by nature be on a managed basis.</p>
<p><i>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</i></p>	<p>No change to existing parking and servicing arrangements in this area are proposed.</p>



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<p><i>site use need to be clearly identified, including details of how this will affect access to/from the existing site.</i></p>	
<p><i>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.</i></p>	<p>The specific internal layout of the development will be addressed as part of a future application for reserved matters, noting that the proposed access arrangements are intended to accommodate articulated vehicles of maximum length.</p>
<p><b>Accessibility</b></p>	
<p><i>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.</i></p>	<p>The proposed access arrangement on Huddersfield Road allows for introduction of pedestrian crossing facilities, which significantly improves infrastructure for those travelling walking or using public transport to access the site (given the location of existing bus stops on Leeds Road), as well as a wider benefit locally.</p>
<p><i>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.</i></p>	<p>The stops identified are relatively remote from the proposed development (a walking distance of approximately 750m). In contrast, the stops on Leeds Road (as identified above) and Stocks Bank Road (which are served by the same services as the stops on Cooper Bridge Road) are closer to the proposed development site (less than 500m from the site), and as such are more likely to be used by staff based at the site.</p>
<p><i>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.</i></p> <p><i>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 sites 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.</i></p>	<p>The feasibility of this arrangement has been considered by the applicant, and it is not considered appropriate or desirable to provide such a route through the site. Notwithstanding that the details of the proposed building are subject to a reserved matters application, the likelihood is that any such route would be through operational yard areas related to the building, which represent a clear issue in terms of health and safety of users, as well as operational practicality of the development for the applicant.</p>