Consultation Response from KC, Highways Development Management (HDM)		
2024/91242 Land north east of Shepley Road, Stocksmoor, Huddersfield, HD4 6XW		
Erection of residential development (up to 50 dwellings) with associated access, parking, public open space, landscaping and infrastructure		
Date Responded: 14/10/24	**Responding Officer:** A.Darwin	**Responding Ref:** 12-33/18

RECOMMENDATION: HDM are unable to support the development proposals as this time in their current form.

Development Overview:

The site is approximately 2.5 hectares of greenfield land located to the east of Stocksmoor; and is bound by a railway line to the north, woodland to the east, Shepley Road to the south, and existing residential properties to the south-east and west. The site is designated as Safeguarded Land within the adopted Kirklees Local Plan (Ref. SLS30).

Access to the site is currently via a field gate on to Shepley Road, which is a single carriageway two-way road that is subject to a 30mph speed limit along the site frontage and to the west leads to the main residential area of Stocksmoor. Immediately to the south of the south frontage, the speed limit on Shepley Road changes to National Speed Limit (NSL = 60mph in this location) and the road name changes to Stone Wood Lane, which leads to Shepley village circa 1.1km travel distance to the east.

The proposed development includes the following:

- 6 x 1-bed dwellings, of which 2 are affordable;
- 10 x 2-bed dwellings, of which 4 are affordable;
- 23 x 3-bed dwellings, of which 4 is affordable;
- 6 x 4-bed dwellings; and
- 5 x 5-bed dwellings.
- Total 49 No. dwellings.

The development proposals were subject to a pre-application consultation with the Local Planning Authority in early 2024, and comments were provided by HDM that have been taken into consideration (to some extent) in the planning submission.

Reference to Plans/Documents:

- Transport Assessment (by AMA dated April 2024);
- Travel Plan (by AMA dated April 2024);
- Design and Access Statement (by Newett Homes dated May 2024);
- Planning Layout Plan - Z159.100 Rev G;
- Materials Plan - Z159.004;
- Proposed Indicative Engineering Levels drawing - Z159;
- Secure by design layout drawing – Z159;
- Proposed Site Access Design drawing (AMA/20547/SK002-P05 Included in TA Appendix B);
- Proposed Long Section (Shepley Road) drawing (AMA/20547/SK006 Included in TA Appendix C);
- Swept Path Analysis drawings (AMA/20547/ATR006/1.4-P01, 2.4P01, 3.4P01 4.4P01 Included in TA Appendix D).

Policy:

Local Plan Policies – LP5, LP19, LP20, LP21, LP22, LP23, LP24; Kirklees Highway Design Guide SPD, Housebuilder Design SPD, NPPF (See Link: https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx).

Reference should also be made to the Councils latest 'Waste Management Design Guide for New Developments' (See Link: https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx and other S38 design guidance documents and standard details that provide detailed requirements relating to the highway and development layout (See Link: https://www.kirklees.gov.uk/beta/regeneration-and-development/highways-guidance-and-standards.aspx).

Site access, road safety and operation:

Site Access

Access to the site is proposed via a new priority junction on Shepley Road, as shown on AMA drawing AMA/20547/SK002-P05. This access has been designed taking into consideration some of the concerns raised by HDM at the pre-application stage, and includes the following:

- A new priority junction access, which includes a 5.5m wide carriageway, 2m wide footways on both side and 6m junction radii;
- As the site access is on a bend that has restricted forward visibility due to vegetation on the inside of the bend, the bend is proposed to be realigned to improve forward visibility. To protect the forward visibility splay around the bend it is proposed to hard pave the verge area on the inside of the bend with block paving.
- The carriageway is proposed to be widened on the bend to enable vehicles to pass, including southbound vehicles passing a vehicle waiting to turn right into the site access;
- A new footway is proposed along the site frontage, connecting the site to the existing footway network to the west and extending as far south as possible within land/highway boundary constraints.
- Vegetation is to be cleared along the site frontage, including a number of large trees, to enable the site access to be delivered and to achieve the junction visibility splays.

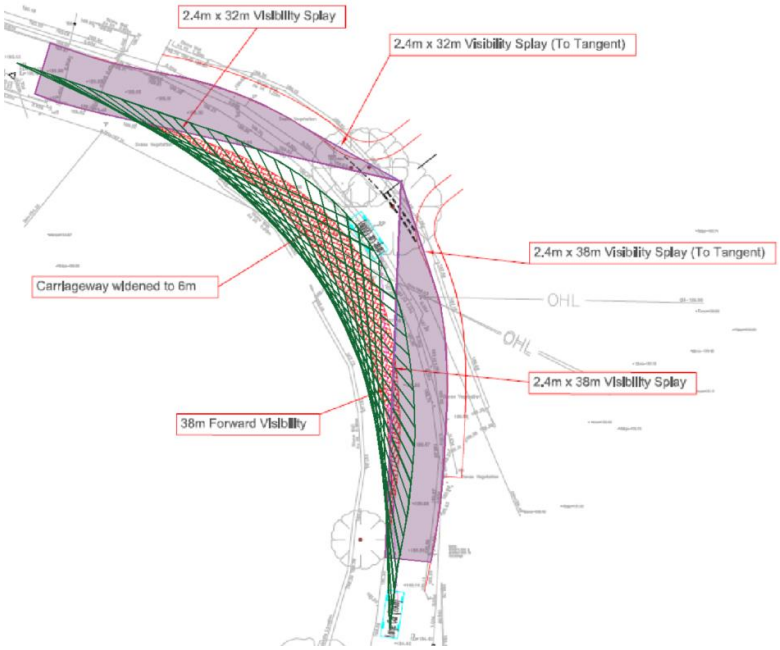
The principle of the site access arrangements are considered appropriate. However, there are a number of issues that need to be addressed before the arrangements can be accepted, which are as follows:

- Additional swept path analysis is required to confirm that a large vehicle (e.g. refuse vehicle) can pass a light vehicle on the widened bend (e.g. passing a stationary car waiting to turn right into the access). This may result in some additional carriageway widening being necessary (in addition to the widening to 6m as currently proposed). It is noted that Shepley Road is signed as being unsuitable for heavy vehicles. As such, passing by large vehicles will be infrequent and only a minimum level of clearance (e.g. 250-500mm) is expected to be demonstrated by this additional swept path analysis.
- The speed data included in the TA confirms that 85th percentile speeds on Shepley Road were recorded as 24.0mph southbound (e.g. exiting the village) and 27.5mph northbound (See section 4.2 of TA), and that the junction visibility splays and forward visibility splays at the bend have been provided in accordance with these speeds. However, following further information provided by the transport consultant who produced the TA, it has been confirmed that the speed survey was undertaken within the immediate vicinity of the site proposed access (e.g. on the apex of the bend) rather than on approach to the proposed junction. Therefore, the approach speeds to the junction may be slightly higher than those recorded by this speed survey. HDM have checked the detailed speed data results that also include approximate vehicle classifications, which suggest that the proportion of larger vehicles (e.g. OGV1, OGV2 and PSV) are at times over 10%. Therefore, the Stopping Sight Distance (SSD) should be based on a deceleration rate of 0.375g, rather than the 0.45g deceleration rate that has currently been used. Based on the higher recorded 85th percentile speed of 27.5m (northbound) and the deceleration rate of

0.375g, this equates to a SSD requirement of 41m. Therefore, in accordance with good practice, it is expected that the 41m SSD requirement is applied to all visibility splays at the junction and forward visibility around the bend, which should be clearly demonstrated on the plans.

- Some long section information has been provided in Appendix C of the TA, showing what appears to be the revised alignment of Shepley Road following the realignment works. This long section has then been used to seek to demonstrate that the visibility splay requirements are achieved vertically. However, the long section information is very limited in detail and does not include gradient or vertical alignment information to enable HDM to assess the feasibility of the proposals. It is noted that the gradient of Shepley Road (as amended by the revised alignment) within the vicinity of the site access should not exceed 1:12 within the full limits of the junction bellmouth and it's immediate approaches, otherwise suitable crossfalls gradients on the site access minor arm are unlikely to be achievable (these should not exceed max. 4% as per the Highway Design Guide SPD). Based on HDMs check of the limited information provided on the long section, it appears that the site access may need to be relocated further to the west where the carriageway gradient would be reduced. Further level information is required, included detailed long section information on Shepley Road that clearly shows the proposed carriageway gradients, including tie-ins to the wider carriageway vertical alignment, together with more detailed vertical alignment/levels information within the minor arm of the junction to ensure that suitable crossfall gradients can be achieved.
- The proposed carriageway alignment on the southeast side of the bend appears to show the edge of the proposed carriageway immediately adjacent to the highway boundary. This should be amended to ensure that min. 600mm clearance is maintained.
- Block paving has been proposed in the inside of the realigned bend to protect the forward visibility splay envelope. The provision of a hard paved surface is welcomed, which should ensure that adequate visibility is maintained. However, a tarmac surface is likely to be preferred, to reduce the costs of future maintenance. The final detail of the paving type could be agreed at the S278 detailed design stage. However, the current paving proposals taper down to nothing at either end, which is not appropriate, and should be amended to provide to a minimum width of 600mm and include edging kerbs.
- It is expected that improved signage and road markings are provided at the 30mph/NSL transition to the south of the site access, which should include a replacement 30mph roundel and improved terminal signage on yellow backing boards. These should be shown on the proposal plans.
- Dropped pedestrian crossings with tactile paving should be provided at the site access, which should be shown on the plans. It should also be confirmed that adequate gradients are achieved at the crossing points.

HDM have rechecked the junction visibility splays and the required forward visibility around the bend based on the 41m SSD requirement, as shown on the sketch below (note this will change once the required adjustments to be carriageway alignment have been made). This indicated that adequate visibility could be achievable horizontally, but this needs to be confirmed by the applicant on revised plans and also checked vertically. It is noted that the forward visibility requirement (measured 1.5m from carriageway edge) should extend to the south by a minimum of 41m from the rear of a waiting righting vehicle into the access (as shown in green on the sketch) and 41m to the northwest of the drivers eye position of a waiting right turner.



Subject to the revised information adequately addressing the above issues and a preliminary layout being agreed, this will then need to be subject to a Stage 1 Road Safety Audit (RSA), alongside the S38 works. It is noted that the RSA Brief must be agreed in advance with HDM, and a draft version of the brief provided in editable format with the further submission for review, including CV's for the proposed independent RSA Team.

Road safety and operation

HDM raised concerns at the pre-application stage that the development will generate a significant level of additional traffic along Stone Wood Lane, which leads to Shepley circa 1km to the east, with this route being attractive to development users due to the amenities available in Shepley (school, shops, medical facilities etc) and for onward journeys to the south. However, this road has a number of physical constraints, which include it being single track width for long sections, having restricted forward visibility, lacks adequate passing places, and has no pedestrian provision etc. The road also forms part of National Cycle Network (NCN) Route 627 (Kirkburton to Millhouse Green).

Therefore, the applicant was advised that Stone Wood Lane was not consider suitable for any further intensification in use from the development without improvement, which does not appear to be deliverable within the highway boundary (e.g. additional passing places may require third party land acquisition). As such, HDM could not support the proposed residential development at this site.

The applicant has not proposed any improvements to Stone Wood Lane as part of the proposals to address the existing deficiencies, and has sought to down play the problems by suggesting that development users are unlikely to use this route to access facilities in Shepley, and would instead travel the longer route to Shepley via Thunderbridge. HDM do not accept this (see further comments below regarding the traffic assessment) and consider the intensification of use of this route would adversely affect it's operation, both for drivers, but more importantly for pedestrians and cyclists (on this NCN route), who would be at increased risk of collisions with passing and reversing vehicles.

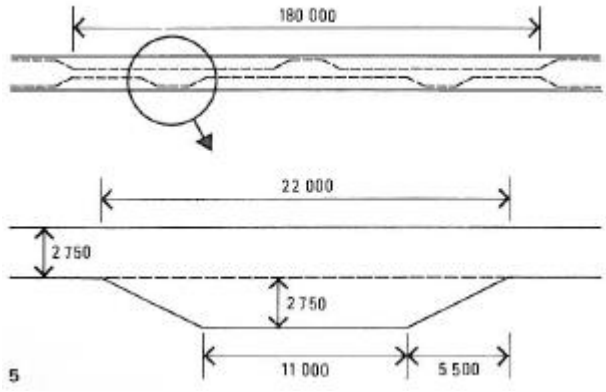
It is noted that HDM have undertaken multiple site visits along Stone Wood Lane, and on a number of occasions have encountered a vehicle approaching in the opposite direction. This has resulted in one of the drivers having to yield and then reverse back for a substantial distance to reach a point where vehicles can pass, at the sub-standard passing places that are available. This problem is then compounded when other vehicles arrive during these occurrences. Depending on the locations where vehicles meet, this can require multiple vehicles to reverse

back beyond the first informal passing point they reach, as there is insufficient space for the other vehicle to pass multiple vehicles.

HDM are not aware of any recent guidance/research on the detailed requirements for passing places on single track roads. However, TRL carried out research on this matter in the 1970's, which is set out in TRRL advice note TSN29R (Studies of delays to traffic on single-lane carriageways with passing places). This was then used to underpin various design guidance, including Design Bulletin 32 (and it's companion guide), which was national guidance that was in place for many years prior to the adoption of 'Manual for Streets' in 2007. As Manual for Streets does not provide any further detailed advice on this matter, the TRRL advice note is still understood to be the most up to date research. The TRRL advice note provides various advice on the requirements for passing places on single track roads, which is dependant on traffic volumes and states:

'…..for two-way flows up to 100 vph two passing places within 180m (i.e. a separation of 60m, centre-to-centre) are sufficient. For higher flows of up to a two-way total of 300vph three passing places are probably necessary (separation of 45m, centre-to-centre).'

The research also includes various diagrams to identify what are regarding as suitably sized passing bays and their required separation, which have been reproduced below (the diagram shows the required 45m passing place separation for hourly flows up to 300vph):



To enable the passing places to work affectively, it is also necessary that there is adequate intervisibility between passing bays, otherwise this will result in vehicles needing to reverse if they encounter a vehicle approaching in the opposite direction once they have exited the passing bay.

HDM have undertaken a high level review of the passing opportunities that are available on Stoney Wood Lane, and it is apparent that they do not comply with the minimum standards recommended in TSN29R. This includes a section of circa 700m where the passing places are inadequate (in terms of frequency, size and/or forward visibility).

Therefore, whilst the additional development traffic may not increase peak hourly traffic flows above 100vph (although the TA does not quantify this), it is clear that the passing provision on Stone Wood Lane is inadequate, and the additional development traffic will adversely impact the operation of the highway, which is of greatest concern due to the impact on pedestrians and cyclist using this important route between Stocksmoor and Shepley.

As such, HDM remain of the view that improvements to Stone Wood Lane should be provided by the development, to address some of these existing deficiencies, and safely accommodate additional development traffic (by all modes) along this route.

Site Layout/Servicing/Waste Collection:

It is expected that the internal road layout shall be built to adoptable standards, as set out in the Kirklees 'Highway Design Guide SPD' and 'Highways Guidance Note – Section 38 Agreements for Highway Adoptions' March 2019 (version 1). Reference should also be made to the Councils latest 'Waste Management Design Guide for New Developments' (See Link: https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx and other S38 design guidance documents and standard details that provide detailed requirements relating to the highway and development layout (See Link: https://www.kirklees.gov.uk/beta/regeneration-and-development/highways-guidance-and-standards.aspx).

At the pre-application stage various advice was provided regarding the site layout proposals, including the recommendation to provide a loop road system to minimise the need for turning heads. Many of the points raised have been incorporated into the site layout, which is considered to be acceptable in principle.

However, following a review by HDM and the S38 team, it has been identified that there are a number of issues with the layout that need to be addressed and the layout is not currently suitable for adoption. A summary of these matters are as follows:

- To enable the streets to be considered for adoption, they need to comply with the Councils Highway Design guide SPD and other S38 guidance documents. However, it is apparent some of the criteria do not comply with the SPD, including some of the critical dimensions. This includes forward visibility that is not provided in full accordance with the SPD (e.g. 17m SSD shown on the shared surface loop road, which must be a minimum of 23m and contained within the highway to be considered for adoption, as per Table 1 of the SPD). Therefore, the applicant should undertake a full compliance check to confirm that all critical dimensions and highway features are to an acceptable standard. This includes the key geometric features identified in Table 1 of the SPD.
- To enable highway adoption, swept path analysis is required to demonstrate that a 11.85m refuse vehicle can pass an oncoming or parked family car throughout the layout, which is likely to require bend widening to accommodate these manoeuvres. This has not currently been demonstrated.
- Whilst full long section information has not been provided, it appears that the section of shared surface street and turning head to the east of the site has a gradient of 1:12, which is not acceptable as shared surface streets should not exceed 1:20. Therefore, either the gradient of this section of street should be reduced to 1:20, or the street should be amended to a standard estate roads (Type 2 Street identified in the SPD).
- The proposed turning head at the end of the shared surface street appears to have been checked with swept path analysis using stationary steering, which is not acceptable. Therefore, this needs to be rechecked without the use of stationary steering, which is likely to require the turning head to be enlarged (typically turning heads need to be circa 30m long to accommodate the Councils design refuse vehicle).
- At the end of the steep shared surface cul-de-sac (which is not currently acceptable due to the gradient) and turning head, there is proposed to be a steep (1:3) embankment, which is then supported at it's base by a tall retaining wall. This is a significant concern, as if a driver loses control (e.g. skids in wet/icy conditions) and leaves the carriageway at then end of the turning head, the vehicle would then travel down the embankment and retaining wall, which is likely to result in a severe incident. This problem is compounded by the steep gradient along the approach. Therefore, a vehicle restraint system will be necessary and must be incorporated into the proposals, with the submission drawings confirming how this can be incorporated (this should be shown indicatively on the plans, and is likely to require a level plateaux/berm at the top of the embankment). It is noted that the level strategy plans indicate a 300mm high kerb at the end of the turning head, which may have been intended to address this issue, but this is not considered to be an adequate solution.
- The total no. of visitor parking bays accords with Council guidance (10 in highway area + 2 on private drive). However, there is no provision within the vicinity of the site access and the LAP, which could result in blocking of the refuse vehicle. Therefore, it is recommended that 2 additional parallel layby spaces are provided on the east side of the carriageway adjacent to the LAP.

- The private drive serving Plots 44-47m is too long (at 50m), so the max. bin carry distance of 25m is exceeded. The bin presentation point also needs to be relocated to the back edge of the highway. The turning head on this private drive also needs checking to ensure it can accommodate a fire tender.

The above issues should be addressed in a revised layout, and should be supported by the additional swept path analysis and long section information. For clarity, the final package of preliminary design information that is required is as follows (some of which has been provided, but will require updating):

- Long sections, cross-sections and contours;
- Dimensioned plans, including street widths, centre line radii, junction stagger distances, junction radii, visibility splays and forward visibility sight-lines;
- Kerbing details, surface treatments and ramp details;
- Pedestrian crossing arrangements;
- Street tree details, including proposed root protection measures;
- Swept Path Analysis (SPA) of Kirklees Design Refuse vehicle to be provided for entire site layout, including turning heads and passing cars at bends/junctions, and fire tender and light van turning on private drives;
- Preliminary information relating to Vehicle Restraint System (VRS);
- Extent of proposed highway adoption and unadopted communal areas to be confirmed. Details regarding the maintenance of unadopted communal areas/facilities is also required. These area need to be clearly annotated on a plan, which include confirmation that unadopted streets will be maintained by the Management Company (this will need to include any street not designed in accordance with the Highway Design SPD).

Any retaining features affecting the highway will require formal technical approval by the Council as the Highway Authority. We would recommend providing details of all proposed retaining features and underground storage facilities (including pipes) to my colleague Farhad Khatibi (Team Leader) in the structures section at the earliest opportunity, who will be able to advise of the necessary requirements in more detail.

Parking:

The TA confirms that car parking has been provided in full accordance with the Councils Highway Design Guide SPD, which includes 1 space for the single bedroom dwellings, 2 spaces for the 2-3 bedroom dwellings and 3 spaces for the 4+ bedroom dwellings. Some of the dwellings include garages, which have been confirmed to comply with the minimum internal dimensions of 3m x 6m. Therefore, the off-street car parking proposals are acceptable.

12 no. visitor parking spaces are provided in laybys, which are welcomed and are generally acceptable. However, as mentioned above, 2 additional spaces are sought adjacent to the LAP to ensure blocking at the site access does not occur. It may also be necessary to provide 2 additional spaces, should the proposed layby spaces be lost on the short section of shared surface street (e.g. if the gradient cannot be reduced to 1:20 and needs to be converted to a Type 2 street).

The 'secured by design' plan confirms that all dwellings that do not benefit from a garages (that can be used for cycle parking) will be provided with a secure cycle shed in the rear garden, which are accessible by external routes. This provision is acceptable, with the final details of the provision secured by planning condition.

The site layout plan includes EV charging facilities in the key. However, these appear to have been omitted from the plan. Therefore, these need to be incorporated, in accordance with building regulation requirements.

Accessibility and Travel Plan:

The supporting TA and Travel Plan includes a high level review of the accessibility of the site by non-car modes. However, the review is very basic, and does not assess in any detail how residents would access key local services, including schools. The TA does mention some facilities such as two pubs and a hairdresses that can be

accessed on foot, located in Thunderbridge and Shelley. However, the TA ignores that fact that the closest and most useful facilities are located within Shepley, including the nearest primary school, medical centre and convenience store.

The most direct and convenient route to the nearest facilities in Shepley are within walking distance (1.1km) of the site. However, to access these facilities, pedestrians (and cyclists) would need to use Stone Wood Lane, which is currently unattractive due to the constraints that have been previously identified (e.g. lack of adequate passing places and forward visibility for drivers, which results in frequent reversing of vehicles, in conflict with non-motorised users in the shared surface road).

The TA suggests the site is served by a bus service that operates on an hourly basis. This is not correct, as the bus frequency (to/from Huddersfield) is generally every two hours. However, the site is located close to Stocksmoor Railway station, so the site is reasonably well served by public transport, which is likely to be the primary non-car mode for utility trips by residents.

Therefore, given that no improvements have been proposed by the development to improve conditions for all highway users on Stone Wood Lane, it is considered that walking levels are likely to be low. This includes parents escorting children to primary schools, which is likely to be all by car.

A Travel Plan has been provided in support of the proposals. However, at the pre-application stage, it was identified that this should include the provision of either the Residential MCard scheme or Residential Travel Plan Fund (RTPF) to the same value. Neither of these measures has been incorporated into the Travel Plan, which is not acceptable. Given that the site is well located to the railway station, it is expected that the Residential MCard scheme would be for bus and rail (the Bus and Rail Zone 2-5 pass that enables travel to Huddersfield currently costs £795.74 per dwelling, and the Zone 1-5 pass that enables travel to Leeds costs £1,139.33 per dwelling).

It is also noted that the Travel Plan includes a target to reduce single occupancy car trips for commuter journeys by 5%. This is not considered to be an ambitious target, nor is it adequate as it only relates to commuter trips, which will only account of a minority of journeys to/from the site.

Therefore, the Travel Plan is not acceptable and should be amended to confirm that the residential MCard scheme will be introduced (or an RTPF, should this be the applicants preferred approach).

Kirklees Council will require a Travel Plan monitoring fee to be secured as part of the S106 agreement. For a development of this scale (classed as a ‘small major’ residential development) the fee is £10,000 (£2,000 per year for 5 years).

Traffic Assessment:

The supporting TA includes an assessment of the peak hour traffic generations and distribution. HDM do not accept these findings, with comments as follows:

Trip Generation

Based on good practice guidance, the TA should assess the trips that will be generated by the development by all transport modes, to ensure that adequate provision for all users is available. However, this has not been done, with the TA only including an assessment of vehicle trips.

The weekday peak hour vehicle trips have been derived using the TRICS database, as shown in the table below:

Table 5-1 Proposed Vehicle Trip Rates and Generation (50 dwellings)

	AM Peak Hour (08:00-09:00)		PM Peak Hour (17:00-18:00)	
	Arrivals	Departures	Arrivals	Departures
Trip Rate	0.154	0.360	0.318	0.159
Trips	8	18	16	8

The TA confirms that the TRICS search has included 'houses privately owned' and excludes sites in greater London and Ireland. However, no attempt appears to have been made to further interrogate the database for sites that are representative of this site, including taking into account the sites low level of accessibility for pedestrians and cyclists. Therefore, the TRICS assessment has not been undertaken in accordance with best practice, and the vehicle trip rates that have been derived are considered to be too low.

As such, a revised assessment should be undertaken that takes into account the specifics of the site and it's accessibility levels. This could involve a 'first principle' assessment that takes account of the anticipated mode split (for all trips and not just journeys to work), applied to a robust 'person trip' generation (typically, a residential development could be expected to generate in the region of 1 trip per dwelling during peak periods).

Development Traffic Distribution

Development traffic distribution has been derived using method of travel to work data from the 2011 census. Based on this approach, the TA suggests that only 3.8% of weekday peak hour development traffic would use Stone Wood Lane.

The TA also suggests that residents are unlikely to use Stone Wood Lane at peak times due to the likelihood of delays (due to it's constrained nature) and would instead travel via Penistone Road/Abbey Road. This assumption is not accepted, as this alternative route is significantly longer and is also not an easy route with it's own constraints, and is also subject to delay at peak times. It is also noted that local residents have undertake surveys of local people (120 responses), which suggest that when travelling to Shepley, 85% of people would use Stone Wood Lane, which appears to be a sensible and realistic estimate.

Whilst the TA's approach to traffic distribution is often used for traffic distribution purposes, it is better suited to employment related development, particularly when assessing weekday network trips. This is due to the majority of weekday peak hour trips associated with residential development not being commuter trips. This is demonstrated by data obtained from the 2022 National Travel Survey, that includes weekday trip start time and journey purpose, which is summarised in the table below:

Trip start time by trip purpose (Monday to Friday only) in England (Source NTS0502a)									
Start time	**Commuting (%)**	**Business (%)**	**Education (%)**	**Escort education (%)**	**Shopping (%)**	**Other work, other escort and personal business (%)**	**Visiting friends, entertainment and sport (%)**	**Holiday, day trip and other (%)**	**All purposes (%)**
0700 to 0759	42	4	16	6	3	14	4	12	100
0800 to 0859	17	2	28	26	4	13	3	6	100
0900 to 0959	9	4	3	5	22	24	15	20	100
1500 to 1559	8	1	25	22	11	13	10	10	100
1600 to 1659	22	3	8	5	14	19	16	14	100
1700 to 1759	30	2	3	2	12	19	20	11	100
All day	17	2	10	8	15	17	17	14	100

As can be seen from the above, during weekday peak periods, commuter trips only represent a minority of trips, ranging between 8-42%, with education trips representing the majority of trips (54%) during the 0800-0900 time period.

It is concluded that the traffic distribution approach that has been used in the TA significantly underestimates the trips that are likely to head toward Shepley via Stone Wood Lane, which includes a range of local amenities, including a primary school, medical centre and shops etc.

The TA goes on to suggest that even if 20% of weekday peak hour development traffic were to use Stone Wood Lane, this would only equate to 5 vehicle trips. This is still considered to be a significant under-estimate, which is based on a traffic generation rate and distribution methodology that are not robust, contrary to the assertion in the TA.

Therefore, it is concluded that a realistic assessment of the traffic impact on the local highway network has not been undertaken, including the assessment of impact on Stone Wood Lane, which is not considered to be suitable to accommodate additional development traffic without improvement.

Conclusion:

HDM are unable to support the development proposals as this time in their current form.