

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: 11/04/25	Responding Officer: A.Darwin	Responding Ref: 12-33/18

RECOMMENDATION: HDM are unable to support the development proposals – see conclusion / recommendation at the end of this response.

Introduction

HDM provided a consultation response on 14/10/24 relating to the above planning application, which confirmed that we were unable to support the proposals in their current form. The reasons for this are summarised below (see previous comments for full details):

1. Whilst the principles of the site access arrangement were acceptable, further supporting information and amendments were requested.
2. Whilst the principles of the site layout were generally acceptable, further supporting information and amendments were requested, including changes required to comply with local highway adoption standards.
3. The initial Travel Plan submitted in support of the proposals was not acceptable, with improvements sought, including the provision of additional measures such as a Sustainable Transport Fund or Residential MCard scheme.
4. Concern regarding the impact of development traffic on road safety and highway operation of Stone Wood Lane.

Following the above HDM comments, a number of meetings and site visits have taken place with applicants team, HDM and other planning colleagues, to discuss how the above outstanding issues could potentially be addressed. This included discussions on the scope for mitigation measures that may be possible on Stone Wood Lane, to mitigate the impact of the development traffic. Following these discussions, the applicant has submitted the following information that includes proposed improvements to Stone Wood Lane:

- FEASIBILITY LAYOUT - SHEET 1_24071-LE-00-ZZ-DR-D-0001_P4
- PROPOSED CONTOUR PLAN_24071-LE-00-ZZ-DR-D-0004_P4
- PROPOSED CENTRE LINE LONG SECTIONS_24071-LE-00-ZZ-DR-D-0005_P3
- VEHICLE TRACKING_24071-LE-00-ZZ-DR-D-0006_P3
- STONE WOOD LANE-EXISTING ROAD DIMENSIONS-SHEET 1_24071-LE-00-ZZ-DR-D-0100_P2
- STONE WOOD LANE-EXISTING ROAD DIMENSIONS-SHEET 2_24071-LE-00-ZZ-DR-D-0101_P2
- STONE WOOD LANE- FEASIBILITY LAYOUT-HIGHWAY IMPROVEMENTS-SHEET 1_24071-LE-00-ZZ-DR-D-0110_P3
- STONE WOOD LANE- FEASIBILITY LAYOUT-HIGHWAY IMPROVEMENTS-SHEET 2_24071-LE-00-ZZ-DR-D-0111_P3
- TPS Transport Assessment Addendum (TAA produced by TPS, ref. P2835 and dated 04.04.05).

With regard to Point 1 above, relating to the site access arrangements, the revised proposals go a long way to addressing the outstanding issues raised. Therefore, HDM do not object to the principle of the proposed site access arrangements, and any further changes required (including changes arising from the required Stage 1 Road Safety Audit process, which would usually be required prior to determination) could be addressed via suitably worded planning conditions.

With regard to Point 2 above, relating the site layout, no revised proposals have formally been submitted to date. However, the latest TAA report indicates that all of the layout changes that were previously requested can be fully

addressed, although this would result in the reduction of development units from 50 to 49 dwellings. It is noted that at previous meetings with the applicants team and attended by HDM, the required site layout changes have been discussed, and it was agreed that all of the required changes could be accommodated. Therefore, whilst HDM do not object to the principle of the proposed site layout arrangements, no updated site plan has been provided to date (or been subject to the Stage 1 Road Safety Audit process), Therefore, HDM are currently unable to confirm whether the revised site layout will be acceptable.

With regard to Point 3 above, relating the Travel Plan matters, the applicant has confirmed in the TAA report that they agree to provide the Residential MCard scheme (Bus and Rail Zone 2-5) for the development (note that the cost of this has now increased from £795.74 to £832.37 per dwelling for Rail Zone 2-5). They have also confirmed agreement of the required Travel Plan Monitoring contribution (5 years x £2,000 per year = £10,000) and also to more challenging Travel Plan targets. Therefore, HDM do not object to the Travel Plan principles for the development, and the final Travel Plan and associated measures could be addressed via suitably worded planning conditions and S106 requirements.

However, with regard to Point 4 above, relating to the impact of development traffic on road safety and highway operation of Stone Wood Lane, HDM are still unable to support the proposals due to the detrimental impact that is anticipated – see further comment below (and previous HDM response).

Road safety and highway operational matters

HDM raised concerns at both the pre-application stage and in the consultation response to the planning submission (see response of 14/10/24 for further details), relating to the additional traffic that would be generated along Stone Wood Lane, which is the most direct route leading 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.

The main concerns related to Stone Wood Lane are due to physical constraints, which include it being single track width for long sections, having restricted forward visibility, lacking adequate passing places, and it has no pedestrian provision. The road also forms part of National Cycle Network (NCN) Route 627 (Kirkburton to Millhouse Green), and includes a number of connections to the public right of way network. Therefore, additional development traffic utilising this route is considered to be detrimental to the safe and efficient movement of traffic (by all modes) on this route, and particularly for active travel users.

As such, the applicant was advised that Stone Wood Lane was not consider suitable for any further intensification in use from the development without improvement, which did not appear to be deliverable within the highway boundary (e.g. additional passing places appear to require third party land acquisition).

In the original planning submission supporting information, the applicants consultants sought to downplay the level of development traffic that may use Stone Wood Lane, and did not propose any measures to improve the route, to address the concerns that had been raised at the pre-application stage. Therefore, in the previous HDM consultation response, it was confirmed that the proposed residential development could not be supported.

In the latest TAA report that has been submitted by the applicant, further information has been provided regarding the anticipated traffic impact of the development, included revised estimates of development traffic that may use Stone Wood Lane. Based on the applicants' assumptions (see paragraph 4.11 of the TAA), they have estimated that up to 16 two-way vehicle trips in the weekday AM peak hour and 19 two-way vehicle trips in the weekday PM peak hour periods may be generated on Stone Wood Lane.

HDM do not accept some of the trip distribution assumptions that have been used to derive the above revised estimates, including the assumption that no primary school children living at the development site would attend schools to the east and travel to school via Stone Wood Lane (e.g. those attending Shepley First School). However, the level of peak hour vehicle trips that have been identified in the TAA, including those that may use Stone Wood Lane are considered reasonable.

To demonstrate this, it is noted that there are currently circa 163 dwellings in Stocksmoor and its immediate locality (e.g. those that have a Stocksmoor address). Therefore, the additional 49 dwellings that are proposed at the development site would represent an increase in dwellings in Stocksmoor of +30%. Therefore, based on a worst case assumption that all traffic using Stone Wood Lane is local to Stocksmoor (which is unlikely to be the case, as there will be some proportion of through traffic), traffic levels are unlikely to increase above 30% of current levels.

Based on the maximum two-way peak hour flow observed on Stone Wood Lane in the most recent survey data (see paragraph 2.17 of the latest TAA report), of 77 two-way vehicles that occurred between 17:00-18:00 on Monday 16th December 2024, a 30% increase in these flows would equate to 23 two-way vehicle trips. This is broadly similar to the additional 19 two-way development trips that the TAA estimates may be generated in the weekday PM peak period on Stone Wood Lane, which would represent an increase of 25% (e.g. based on an increase of 19 two-way trips from a baseline of 77 two-way vehicle).

In summary, it is accepted that the development may increase vehicle trips on Stone Wood Lane by approximately 19 two-way trips during peak hour periods.

Notwithstanding the above, the information in the TAA (paragraph 2.17) that identifies a 'virtual 7-day period' peak hour flow of 55 two-way vehicles on Stone Wood Lane is not accepted as being valid for assessment purposes. This is due to an average over 7 days being irrelevant for undertaking a robust traffic assessment (as weekend flows are typically lower than weekday flows), and as the data does not reflect the previous traffic count data utilised in the original Transport Assessment (TA). To demonstrate this, below is a summary of the hourly traffic flow data adjacent to the site, utilised in the original TA (note that this data table has been produced by HDM, based on the raw data supplied by the applicants original transport consultant):

2-way traffic on Shepley Road adjacent to site access (Motor vehicles only, and excluding cycles)								
Time	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday	Average Weekday
	12/04/2023	13/04/2023	14/04/2023	15/04/2023	16/04/2023	17/04/2023	18/04/2023	
0000 - 0100	3	5	8	1	0	0	2	1.2
0100 - 0200	0	0	2	0	0	0	1	0.2
0200 - 0300	4	1	2	1	0	0	0	1
0300 - 0400	1	0	0	2	0	0	0	0.6
0400 - 0500	0	0	0	2	0	0	1	0.6
0500 - 0600	4	5	0	4	4	2	6	4
0600 - 0700	7	7	3	11	7	10	7	8.4
0700 - 0800	64	15	8	60	67	56	53	60
0800 - 0900	90	14	12	70	76	49	61	69.2
0900 - 1000	51	33	25	24	50	42	38	41
1000 - 1100	39	53	35	39	33	23	17	30.2
1100 - 1200	35	44	30	29	46	39	31	36
1200 - 1300	53	48	43	37	32	28	42	38.4
1300 - 1400	70	33	50	23	37	42	38	42
1400 - 1500	67	32	44	34	30	35	33	39.8
1500 - 1600	80	38	37	51	54	50	42	55.4
1600 - 1700	85	39	47	50	83	59	45	64.4
1700 - 1800	77	36	42	76	72	71	56	70.4
1800 - 1900	42	22	30	36	39	33	41	38.2
1900 - 2000	31	16	15	20	30	31	29	28.2
2000 - 2100	18	14	18	20	17	21	20	19.2
2100 - 2200	6	13	11	10	10	13	9	9.6

2200 - 2300	8	13	2	8	3	10	0	5.8
2300 - 0000	4	17	4	3	6	2	2	3.4
0700 - 1900	753	407	403	529	619	527	497	585
0600 - 2200	815	457	450	590	683	602	562	650.4
0600 - 0000	827	487	456	601	692	614	564	659.6
0000 - 0000	839	498	468	611	696	616	574	667.2

As can be seen from the above, the maximum hourly two-way vehicle flow from the previous survey data was 90 two-way vehicles, which occurred on Friday 12/04/23; and the average weekday AM and PM two-way peak hour vehicle flows were 69 and 70 vehicles respectively.

Therefore, utilising the development traffic increases that have been identified in the latest TAA (up to 16 and 19 two-way vehicle trips in the AM and PM weekday peak period), traffic is expected to increase on Stone Wood Lane by up to **27%** (e.g. 19 trips compared to an average hourly baseline of 70 trip in the weekday PM peak), with the **average weekday PM peak hour two-way flow increasing to 89 two-way vehicles**.

As identified in the previous HDM response, and as accepted in the latest TAA report, passing places are usually required on single track roads at a maximum spacing of 60m, and require adequate inter-visibility between them. This guidance originates from research undertaken by TRL (see previous HDM comments for further details), and has been utilised in various guidance documents, and is still considered to be useful guidance on this matter. The research is also quoted in DfT document: *'TAL 02/04 Rural traffic calming - Bird Lane, Essex'*, which recommends that:

'Passing places should have a minimum length of 3 cars. Ideally each passing place should be clearly visibility from the last, with spacing no greater than 60m (research shows this is sufficient for vehicle flows of up to 300 vehicles per hour).'

Following a number of meetings and site visits attended by the applicants team and HDM (and the councils tree officer), the applicants consultant has now produced a package of measures that seek to improve the existing passing places on Stone Wood Lane and to also improve forward visibility, with the proposals included in the latest TAA report.

HDM have reviewed these proposed passing place improvements, and accept that they are likely to be the most that can be achieved within the constraints of the highway boundary, along the most constrained / narrow section of Stone Wood Lane. However, whilst these works would provide some improvement over the current arrangements, HDM do not consider that they are adequate to mitigate the impact of additional development traffic, with the passing bay provision still falling well short of the required provision mentioned above. A summary of some of the key issues are as follows:

- All of the passing bay improvements are proposed in locations where passing already takes place, which includes at gate entrances, on verge areas, and in other naturally created passing places (e.g. not hard paved carriageway areas). Therefore, whilst the proposals would provide a better quality carriageway surface at these passing locations, no entirely new passing bays for cars/vans would be created. Therefore, the proposals would not increase the number/frequency of passing place locations.
- The proposals would increase the size of some of the passing places (as well providing an improved carriageway surface). However, some of the passing places could only accommodate 1 vehicle, so may not be effective. Also, some of the passing places are only 4.2m wide, so would be inadequate to enable two cars to pass.
- Whilst some vegetation clearance has been noted on the plans, there are still a number of sections along the route where there would be inadequate inter-visibility between passing places, which cannot be improved due to the horizontal and vertical alignment of the highway, as well as vegetation and other features that are outside of the highway boundary that cannot readily altered.
- Even with the improvements, there would still be a number of sections of Stone Wood Lane where the spacing of passing places (for cars/vans) is well beyond the recommended maximum distance of 60m,

including the following sections (note the quoted chainage is taken from the improvement drawings included in the TAA report):

- A 140m+ length between ch.700-560, which also has restricted forward visibility due to bends and a steep gradient;
- A 60m+ length between ch. 520-460, which also has restricted visibility due to a bend and the vertical alignment of the carriageway;
- A 100m+ length between ch.440-340, which also has restricted forward visibility due to bends;
- A 70m length between ch.300-230, which also has restricted forward visibility due to bends;
- A 100m+ length between ch.120-20;
- For a 500m section of Stone Wood Lane between ch. 20 to 520, the carriageway width is generally between 2.6-3.5m wide (except at the passing places), which is below the width where a car/van can safely pass a pedestrian or cyclists, as acknowledged in the TAA report.

In conclusion, whilst it is appreciated that the applicant has attempted to offer improvements to Stone Wood Lane to mitigate the impact of additional development traffic on this route, the potential improvements are significantly limited by existing highway constraints, and are not considered to materially improve the current situation or adequately mitigate the development traffic impact. Therefore, the development would exacerbate existing issues along this route.

Conclusion / Recommendation

In conclusion, HDM are unable to support the proposals due to the detrimental impact of development traffic on the local highway network (namely Stone Wood Lane), which will adversely impact the safe and efficient movement of traffic (by all modes), and be particularly detrimental to active travel users, contrary to Kirklees Local Plan Policy LP21 and LP23, and in accordance with paragraphs 115 and 116 of the NPPF. Therefore, it is recommended that the development proposals should be refused on these grounds.