Shepley Road, Stocksmoor
Proposed Residential Development

Highways & Transportation Proof of Evidence
(Text)

By Philip M Owen, BEng (Hons), CEng, MICE, MIHT
On behalf of Newett Homes

Planning Application Reference – 2024/62/91242/E
Appeal Reference – APP/Z4718/W/25/3375000

Final Issue – 27th January 2026

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Contents

Appendices (bound separately)

1 Qualifications and Experience

1.1.1 My name is Philip Maxwell Owen. I am the Managing Director of Optima Highways and Transportation Limited, an independent consultancy based in Leeds. I was formerly an Associate Director with WSP Development and have 30 years' experience in the traffic and transportation field. During this time, I have advised a variety of private sector companies on the traffic and transportation aspects of a wide range of development proposals.

1.1.2 I hold an honours degree in Civil Engineering and am a chartered member of the Institution of Civil Engineers (ICE). I am also a member of the Chartered Institution of Highways and Transportation (CIHT).

1.1.3 I have been retained by Newett Homes as an expert witness for the purposes of this appeal. This Proof of Evidence (PoE) has been prepared to consider the traffic, highway and transport related matters.

1.1.4 I have visited the Site and surrounding area on several occasions for the purposes of this appeal and am familiar with the relevant guidance/policy requirements associated with it.

Statement of Truth

1.1.5 I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true to the best of my knowledge or belief. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer irrespective of by whom I am instructed.

Signed:

Name: ……Philip M Owen

Date: …… 27th January 2026

2 Introduction

2.1.1 I have been appointed by Newett Homes to assist in their appeal against the refusal of a full planning application (Ref: 2024/62/91242/E) for a proposed residential development of 50 dwellings located on land to the north-east of Shepley Road, Stocksmoor.

2.1.2 The location of the Site is shown on the figures in Appendix A and the proposed development Site layout is shown on the Planning Layout drawing Rev G (CD 1.5).

2.2 Background

2.2.1 To support the planning application, which was validated by Kirklees Council on the 10th May 2024, a Transport Assessment (TA – Ref: Core Document 1.23) and a Travel Plan (TP – Ref: CD 1.24), both dated 25th April 2024, were prepared by Andrew Moseley Associates (AMA).

2.2.2 Acting as the Local Highway Authority (LHA), the Highways Development Management team (HDM) within Kirklees Council (KC) undertook a review of the 2024 AMA Transport Assessment and Travel Plan reports and provided comments in their consultation response dated 14th October 2024 (CD 4.14). In summary the Council stated that they were unable to support the development proposals for the following primary reasons:

- Whilst the principles of the proposed Site Access arrangements were considered appropriate further information was sought requiring vehicle swept path analysis, stopping sight distances, gradients and long sections;
- Whilst the principle of the internal Site layout was considered generally acceptable further information and amendments was required;
- Disagreement with the proposed development trip generation calculations and traffic distribution analysis, particularly along Stone Wood Lane, which extends south-eastwards from the Site into the village of Shepley;
- Concern regarding the impact of development traffic and the lack of mitigation measures then proposed along Stone Wood Lane; and
- Updated Travel Plan required including the provision of a sustainable transport fund or MetroCard scheme.

2.2.3 Newett Homes appointed TPS Transport Consultants Ltd (TPS) to address the Councils October 2024 consultation comments, which following further discussions/meetings with KC both on-line and on-site, culminated in the production of a Transport Assessment Addendum (TAA) report dated 4th April 2025 (Reference CD 1.33).

2.2.4 Following a review of the TAA, Kirklees Council HDM produced a second consultation response dated 11th April 2025 (Ref: CD 4.16). A summary of the consultation findings is as follows:

- The Council confirmed that the revised Shepley Road/Site Access arrangements address their previous concerns and conclude that "*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"*. This matter is therefore resolved;
- KC acknowledge the Residential MetroCard and Monitoring funding commitments to be included in the Travel Plan and conclude that "*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".* This matter is therefore resolved;
- With respect to the internal Site layout, at the point of determination, the Delegated Planning Report (Ref: CD 3.1) confirms that the minor highways related revisions requested can be achieved through a suitably worded planning condition. The KC HDM consultation dated 11/4/25 (CD 4.16) also acknowledged 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*".

  It is common ground between the Council and Appellant that the current Site layout (CD 1.5) is suitable for a private estate, subject to standard conditions for further highway details and it is also common ground that should it be the intention that the highways are delivered to an adoptable standard then minor amendments to the planning layout could be submitted via a discharge of condition – see Statement of Common Ground (SoCG) document for further details.
- Based on a high assumed vehicular trip rate and traffic distribution along Stone Wood Lane (as set out in the TAA), the Council determined that "*the development may increase vehicle trips on Stone Wood Lane by approximately 19 two-way trips during peak hour periods*"; and
- Following a review of the proposed passing place improvements along Stone Wood Lane the Council acknowledged that the "*works would provide some improvement over the current arrangements*", however went on to conclude

that "*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*". This matter therefore remains unresolved with the Council.

2.2.5 Acting as the Local Planning Authority (LPA), Kirklees Council planning officers accepted the LHA officer advice set out in their 11th April 2025 Consultation response (Ref: CD 4.16) and reproduced the same information in the Delegated Planning Report (Ref: CD 3.1), which culminated in a recommendation to refuse planning permission for the following two reasons (the Decision Notice dated 24th April 2025 is provided as CD 3.2).

> *"1. The detrimental impact of development traffic on the local highway network, namely Stone Wood Lane, would adversely impact the safe and efficient movement of traffic by all modes, and be particularly detrimental to active travel users. Mitigation measures have been proposed to Stone Wood Lane which are considered to be insufficient to mitigate the harm of additional vehicle movements generated by the proposal. The proposal would therefore result in unacceptable impacts on highway safety and the amenity of active travel users utilising the route, contrary to Kirklees Local Plan Policy LP21(a, b, e), LP23, and LP24(dii) and paragraph 116 of the National Planning Policy Framework."*

> *"2. There is insufficient information supporting the application relating to requirements to support local infrastructure, to off-set the impacts of additional housing provision. A Section 106 agreement is required to ensure contributions towards the provision of affordable housing, education, on and off-site public open space, and the ongoing management and maintenance of on-site facilities including the public open space, drainage infrastructure (until adoption), and on-site significant ecological habitats. In the absence of an agreed Section 106 agreement, the proposed development therefore fails to achieve the requirements of policies LP4, LP11, LP28, LP30(i), LP49, and LP63 of the Kirklees Local Plan."*

2.2.6 Following the refusal of planning permission Newett Homes appointed myself to become the third highways consultant on the project. I undertook a thorough review and assessment of the previous work undertaken by the first two consultants and concluded that some aspects were wrong, in particular the predicted levels of traffic generation and distribution along Stone Wood Lane.

2.2.7 My Proof of Evidence (PoE) has been prepared to address the Council's first Reason for Refusal (RfR) relating to the impact of development traffic along Stone Wood Lane, as well as the matters raised within the Rule 6 Party Statement of Case, related to traffic.

2.3 Proof Structure

2.3.1 The remainder of this proof is structured as follows:

- Chapter 3 describes the existing Site and the surrounding local highway network. It also contains information on existing traffic flows as well as accident data;
- Chapter 4 sets out the development proposals including the Site access arrangements off Shepley Road;
- In Chapter 5 the accessibility of the site by non-car modes is described and considered;
- Chapter 6 sets out the base traffic flows, details of the vehicular trips generated by the development and the distribution of that traffic on the local highway network;
- Chapter 7 assesses the highway improvements proposed along the Stone Wood Lane corridor and their beneficial effect on existing and future highway users including pedestrians and cyclists; and
- In Chapter 8 I summarise the highways/transportation matters and detail my conclusions. This chapter also acts as my summary PoE.

3 The Site and Existing Highway Network

3.1 Introduction

3.1.1 This chapter describes the existing Site and the surrounding local highway network, with a particular focus on the Shepley Road/Stone Wood Lane corridor which routes to the south and east of the Site. It also contains information on existing traffic flows as well as accident data.

3.2 The Existing Site and Adjacent Highway Network

The Site

3.2.1 The development Site is located to the north-east of Shepley Road on the eastern edge of the village of Stocksmoor, which lies some 7km to the south-east of Huddersfield town centre. The Site in relation to the strategic and local transport networks is shown indicatively on the figures attached at Appendix A.

3.2.2 The Site has an overall area of approximately 2.5 hectares and is bound by the Penistone railway line to the north, woodland to the east, Shepley Road to the south and residential properties to the west.

3.2.3 The Site is designated as Safeguarded Land within the 2019 Kirklees Local Plan (Ref: SLS30), which means that the Council has identified that the Site is suitable to accommodate development in the longer term.

3.2.4 The Site comprises undeveloped, greenfield land and is currently accessed from Shepley Road by a field gate located in the south-west corner of the Site.

Local Highway Network

3.2.5 Shepley Road is a rural, residential street which forms the southern boundary of the Site and provides access to it. Many of the roads in the local area are historic rural routes and users of them will be familiar with their nature and non-standard layout. The local highway network is shown on the figure in Appendix A.

3.2.6 The Site is located on the outside of a bend on Shepley Road where the carriageway width is some 4.5m to 5.1m and there are grass verges to both sides with no footways. The road is lit along the Site frontage and is subject to a 30mph speed limit – noting that beyond the eastern boundary of the Site Shepley Road becomes unlit and subject to a 60mph speed limit. Due to the nature, alignment and highway geometry of the Shepley Road/Stone Wood Lane corridor, actual traffic speeds are below the 30mph limit and well below the 60mph limit – as detailed later in this chapter.

3.2.7 To the west of the Site Shepley Road remains lit and subject to a 30mph speed limit but widens to a 6m carriageway with circa 1.6m footways to both sides. Some 115m from the Site boundary Shepley Road forms one of the minor arms at a priority crossroads junction with Station Road/Fulstone Road and Cross Lane on the opposite side.

3.2.8 From this junction: Station Road extends in a north-easterly direction through Stocksmoor to join Birks Lane which provides access to Thunder Bridge and the A629 Penistone Road beyond; Fulstone Road heads south-west passing through the village of Fulstone before meeting the A635 at New Mill; and Cross Lane extends north-west providing access to several other rural routes that heads towards Honley and Huddersfield.

3.2.9 Shepley Road extends southwards from the Site for some 250m where it turns ninety degrees eastwards to enter some woods and becomes known as Stone Wood Lane. Stone Wood Lane then continues for another circa 800m before arriving at the junction with Jenkyn Lane on the outskirts of Shepley where it becomes known as Jos Lane. It is over this 800m length of Stone Wood Lane that the Council has raised concerns, which has culminated in RfR1 – this section of the highway network is therefore described in detail in the following section.

Existing Shepley Road/Stone Wood Lane Corridor

3.2.10 The Shepley Road/Stone Wood Lane corridor extends for some 1.07km between the Site and the Jenkyn Lane junction on the western edge of Shepley.

3.2.11 The average weekday, two-way traffic flows along the Shepley Road/Stone Wood Lane corridor to the east of the Site are 65 and 74 vehicles during the morning 08:00 to 09:00 and evening 17:00 to 18:00 peak hours respectively and 618 vehicles daily (survey details and sources of information are provided later in this chapter).

3.2.12 Two-way traffic flow of 65 to 74 vehicles per hour are 'low' and Stone Wood Lane is therefore considered to be 'lightly trafficked'. This aligns with the DfT document Manual for Streets (MfS – CD 7.3) which provides national guidance on the design of residential streets as well as high streets and lanes in rural areas. MfS does not provide a definitive, threshold figure as to what constitutes 'lightly trafficked' but instead generically describes residential streets and lanes in rural areas as being lightly trafficked (many of which will have flows greater than 74 veh/hr) within the 'Status and application' page. Furthermore, MfS states at paragraph 7.9.3 that 300 vehicles per hour (four times the quantum on Shepley Road) represents a "relatively low" traffic flow and at paragraph 7.2.14 advises that routes with around or less than 100 vehicles per hour are much more likely to operate satisfactorily as a shared space i.e. a street which pedestrians, cyclists and vehicles share the space, and where the non-vehicle users can do so without feeling intimidated by motor traffic. It is also noted that in their 2014

consultation response (copy in Appendix L) to the Cross Lane, Stocksmoor planning application (Ref: 2014/60/90460), which is allocated site HS192, the Highway Officer confirmed that Cross Lane is a "*lightly trafficked*" road. Cross Lane accommodates a higher level of traffic flow than Stone Wood Lane.

3.2.13 It is recognised that the route (particularly the Stone Wood Lane section) presents several physical/geometrical constraints including a reduced carriageway width (single track in many areas), reduced forward visibility, fairly steep gradient in places (particularly through the woods), substandard passing places and a lack of segregated pedestrian provision.

3.2.14 That said, Stone Wood Lane is a typical quiet, shared surface, rural lane commonly found throughout the UK including many places elsewhere in Kirklees e.g. Dobb Top Road/Smithy Lane in Holmebridge, which lies close to a consented residential development Site which Mr Darwin and I have both worked on (Ref: 2023/91212). Such rural roads often do not conform to present day guidance on highway standards and require a non-standard approach (as stated in MfS2 para 1.2.1 – CD 7.4). And as further advised in MfS2 (para 2.8.2) "*to attempt to do so* [i.e. conform to modern standards] *could be to the detriment of local character and lead to intrusion into some of our most outstanding landscapes*".

3.2.15 The Shepley Road/Stone Wood Lane corridor forms a small section of the 38km National Cycle Network (NCN) Route 627 which runs between Kirkburton to the north of the Site and Millhouse Green (via Shepley) to the south. The NCN comprises over 19,000km of traffic-free paths, quiet roads and traffic-calmed routes that connect towns, villages and the countryside across the UK - thereby offering routes for local commuting, leisurely rides and long-distance touring.

3.2.16 Two Public Right of Way (PRoW) footpaths connect with the Shepley Road/Stone Wood Lane corridor. As shown on the figure in Appendix A, the first PRoW (Ref: KIR/191/10) extends in a south-westerly direction through the woods from where road turns ninety degrees and changes its name from Shepley Road to Stone Wood Lane. Whilst not shown on the Council's Definitive Map there is also an established footpath located on the north side of Stone Wood Lane opposite KIR/191/10.

3.2.17 The second PRoW (Ref: KIR/137/20) routes northwards from the very eastern end of Stone Wood Lane towards the railway line, where it changes its reference to KIR/137/10 to connect with a bridleway and Dam Hill beyond.

3.2.18 Whilst again not shown on the Council's Definitive Map, two additional established footpaths extend northwards and southwards from Stone Wood Lane at the eastern edge of the wood.

3.2.19 Road signage provided at either end of the Shepley Road/Stone Wood Lane corridor informs drivers that the route is unsuitable for HGV's.

3.2.20 MfS (CD 7.3) advises that lanes in rural areas can provide other functions than just movement, including various leisure activities such as walking, cycling and horse riding. This concept is also accepted in the Department for Transport Traffic Advisory Leaflet (Tal) 3/05 ' Quiet Lanes' (CD 7.5) which states that quiet lanes are "*minor rural roads which are appropriate for shared use by walkers, cyclists, horse riders and motorised users. They should have low traffic flows travelling at low speeds*." Such is the case for Stone Wood Lane which exhibits both low traffic flows (65 to 74 two-way vehicles during the busiest peak hours) and low speeds (average of 19.1 to 28.4mph and 85th percentile speeds of 22.1 to 33.3mph).

3.2.21 On-site observations confirm the rural, low frequency use of Stone Wood Lane and as a pedestrian, I observed that it is not intimidating when a vehicle does appear due to the relatively slow traffic speed, available visibility, opportunity to shelter within verges/carriageway edges and driver caution/awareness (which residents of the development will also have).

3.2.22 As a driver, the overall nature, multi-modal use and geometry of Stone Wood Lane combine to enhance awareness/caution, reduce vehicle speeds and any potential collision risk. This is borne out by the historic accident data obtained from the Council (further details provided later in this chapter), which confirms that **not one personal injury accident** had been recorded along the Shepley Road/Stone Wood Lane corridor over a 15-year period, when 3 to 5 years is the normal timeframe for assessment and personal injury accident records are the recognised empirical method for assessing accidents.

3.3 Existing Surveys

Traffic Surveys of Shepley Road/Stone Wood Lane Corridor

3.3.1 Automatic Traffic Count (ATC) surveys have been undertaken at five separate locations along the Shepley Road/Stone Wood Lane corridor which recorded traffic volumes and speeds over a 7-day period from Monday 15th to Sunday 21st of September 2025. A copy of the data from all five ATCs is provided in Appendix B. The locations of the 2025 surveys are the same or very similar to those previously completed in December 2024 by TPS to support their TA Addendum report (CD 1.33).

3.3.2 Within the TPS TA Addendum, an additional survey was undertaken at the 30mph/National Speed Limit (NSL) transition on Shepley Road between 13th December and 19th December 2024. This Dec 2024 ATC has also been referenced in my PoE as it

was used to confirm that adequate visibility is provided at the proposed Site Access junction onto Shepley Road.

3.3.3 A location plan showing where each of the six ATC surveys took place is also provided in Appendix B. Tables 3.1 and 3.2 summarise the traffic flows and vehicular speeds taken from the six surveys.

3.3.4 The Council's SoC Appendix 1 report also references the same six ATC surveys which I have summarised in tables 3.1 and 3.2. However, the Council include a seventh ATC survey which was completed in April 2024 and included within the original Transport Assessment (TA) report prepared by AMA (CD 1.23). I disagree that this seventh ATC survey should be used in the assessment of the Shepley Road/Stone Wood Lane corridor and my reasoning is set out in the Note included within Appendix G of my PoE. Furthermore, even if the seventh ATC survey is included in the data, it does not affect the outcome of my assessments, findings or conclusions.

Table 3.1 - Shepley Road/Stone Wood Lane Traffic Surveys – Traffic Flows

Ref	Location	Average Two-way Weekday Traffic Flows (vehicles)								
		AM Peak Hour (08:00 – 09:00)			PM Peak Hour (17:00 – 18:00)			Daily 24hr		
		To Stocksmoor	To Shepley	Two-Way	To Stocksmoor	To Shepley	Two-Way	To Stocksmoor	To Shepley	Two-Way
13/12/24 - 19/12/24 Dec 24 Site 2	At 30mph/NSL Transition on Shepley Road	33	29	63	29	33	62	289	328	618
Sep 25 Site 1 On hill nearest site	Shepley Road	36	26	62	31	40	71	282	288	570
Sep 25 Site 2	Stone Wood Lane	36	26	63	31	41	72	283	286	568
Sep 25 Site 3	Stone Wood Lane	37	28	65	32	41	73	290	296	586
Sep 25 Site 4	Stone Wood Lane	34	26	60	31	43	74	277	284	562
Sep 25 Site 5	Stone Wood Lane	36	26	62	31	42	73	285	288	573

3.3.5 As shown in Table 3.1 the traffic surveys show that the existing greatest average weekday peak hour flows along the Shepley Road/Stone Wood Lane corridor are 65 vehicles during the morning peak (08:00 to 09:00) and 74 vehicles during the evening peak (17:00 to 18:00). These values are greater than (but still broadly align) with the survey undertaken in December 2024 at the 30mph/NSL transition on Shepley Road, which gave average weekday AM and PM vehicle flows of 63 and 62 respectively.

3.3.6 The Council's SoC Appendix 1 report includes the same average weekday traffic flows shown in my table 3.1 above but also considers maximum weekday traffic flows. I disagree that maximum traffic flows should be used in the assessment of the Shepley Road/Stone Wood Lane corridor and my reasoning is set out in the Note included within Appendix G of my PoE. Furthermore, even if the maximum traffic flow values are applied, it does not affect the outcome of my assessments, findings or conclusions.

Table 3.2 - Shepley Road/Stone Wood Lane Traffic Surveys – Traffic Speeds

Ref	Location	Traffic Speeds in Each Direction (mph)			
		Average		85th Percentile	
		To Stocksmoor	To Shepley	To Stocksmoor	To Shepley
13/12/24 - 19/12/24 Dec 24 Site 2	At 30mph/NSL Transition on Shepley Road	21.1	20.4	24.4	23.2
Sep 25 Site 1 On hill nearest site	Shepley Road	27.3	26.5	31.6	30.2
Sep 25 Site 2	Stone Wood Lane	28.4	25.4	33.3	29.9
Sep 25 Site 3	Stone Wood Lane	19.1	20.3	22.1	23.7
Sep 25 Site 4	Stone Wood Lane	23.6	23.9	27.8	28.1
Sep 25 Site 5	Stone Wood Lane	24.2	25.9	28.8	31.0

3.3.7 The recorded traffic speeds vary along the Shepley Road/Stone Wood Lane route and as shown in Table 3.2 average values between 19.1mph and 28.4mph were recorded with 85th percentile values lying between 22.1mph 33.3mph. And these speeds will vary further along different sections of the lane i.e. these values are at the survey location – not at every bend and narrower section.

3.3.8 The Councils SoC Appendix 1 report states that "*the LPA do not accept that average speed data is of relevance in this situation, as it is not typically used for traffic engineering assessment purposes, where 85th percentile data is used*". The Council go on to suggest that some of the speed data in the vicinity of the single track sections of Stone Wood Lane should be "*treated with caution*" because traffic is not entirely in a free-flow condition (although they do not suggest any better, alternative methodology for acquiring the data). Notwithstanding this, and perhaps because the most appropriate methodology for acquiring the data has been undertaken, the Council conclude (at para 11) that they "*accept the 85th percentile data can be used for assessment purposes*".

3.3.9 In my table 3.2 above I have included average and 85th percentile values. The reason for including average values is that it provides context, is well understood and is the measure used by the DfT and LHA's when setting local speed limits. Notwithstanding this, I agree with the Council that the geometric assessment of Stone Wood Lane, particularly with respect to matters of visibility, should be based on 85th percentile speed values.

Pedestrian/Cycle/Equine Surveys of Shepley Road/Stone Wood Lane Corridor

3.3.10 Two pedestrian/cycle/equine surveys have been undertaken at either end of the Shepley Road/Stone Wood Lane corridor in order to capture trips at both ends of the route – one located on Shepley Road some 110m south of the Site and the other on Stone Wood Lane just west of the Jenkyn Lane junction (as shown on the figure in Appendix B). The surveys recorded the number of pedestrians, cyclists and horse riders on a weekday and a Saturday over a 12-hour period between 07:00 to 19:00.

3.3.11 The western Shepley Road survey was conducted on Wednesday 24th and Saturday 27th September 2025. The eastern Stone Wood Lane survey was also undertaken on the same two days but for unknown reasons the survey company advised that the camera had failed on Saturday 27th. The Stone Wood Lane survey was therefore repeated on Saturday 4th October 2025 over the same 12-hour period. A copy of the survey data for both locations is provided in Appendix C and is summarised in Tables 3.3 and 3.4.

Table 3.3 Shepley Road (south of Site) - Ped/Cycle/Equine Surveys (Sep 2025)

Survey Date	Northbound				Southbound				Two-way			
	Peds	Cyclists	Equine	Total	Peds	Cyclists	Equine	Total	Peds	Cyclists	Equine	Total
07:00 to 19:00 on Wednesday 24/9/25	10	3	2	15	13	3	0	16	**23**	**6**	**2**	**31**
07:00 to 19:00 on Saturday 27/9/25	15	10	0	25	19	8	0	27	**34**	**18**	**0**	**52**

Table 3.4 - Stone Wood Lane (west of Jenkyn Lane) - Ped/Cycle/Equine Surveys (Sep/Oct 2025)

Survey Date	Northbound				Southbound				Two-way			
	Peds	Cyclists	Equine	Total	Peds	Cyclists	Equine	Total	Peds	Cyclists	Equine	Total
07:00 to 19:00 on Wednesday 24/9/25	7	5	0	12	7	3	2	12	**14**	**8**	**2**	**24**
07:00 to 19:00 on Saturday 4/10/25	5	0	0	5	3	0	0	3	**8**	**0**	**0**	**8**

3.3.12 The surveys show that for Shepley Road, a greater use was recorded on the Saturday, when **34 pedestrian and 18 cycle two-way movements were observed over the 12-hour period i.e. a total of 52 two-way non-motorised users per day**. On average this equates to **just under 3 pedestrian and 1.5 cycle movements per hour i.e. a total of 4.5 two-way non-motorised users per hour**. No equine movements took place on this part of Shepley Road on the Saturday, but there were two on the Wednesday when pedestrian/cycle movements were lower.

3.3.13 On Stone Wood Lane, a greater use was recorded on the Wednesday, when 14 pedestrian, 8 cycle, and 2 equine two-way movements were observed over the 12-hour period i.e. a total of 24 two-way non-motorised users per day . On average this equates to just over 1 pedestrian, under 1 cycle and well below 1 equine movement per hour i.e. a total of 3 two-way non-motorised users per hour. These flows are less than those recorded on Shepley Road and therefore I will take the Shepley Road survey flows (shown in bold above) as the worst-case.

3.3.14 The Council's SoC Appendix 1 report queries the results of the Optima Sep/Oct 2025 pedestrian/cycle/equine surveys and therefore a review has been undertaken of very similar surveys completed in June 2025 by the previous consultant on the project. TPS instructed a weeklong pedestrian/cycle/equine survey in the same locations as the Optima September 2025 surveys. The TPS surveys, which were completed between Tuesday 3rd June and Monday 9th June 2025 over the same 12 hour period between 07:00 and 19:00, are included within Appendix D.

3.3.15 The average flows across the 7 day period (i.e. total weekly flow divided by 7), for each non-motorised user, are summarised within Tables 3.5 and 3.6 for the Shepley Road (south of the Site) and Stone Wood Lane (west of Jenkyn Lane) locations respectively.

Table 3.5 – Shepley Road (south of Site) - Ped/Cycle/Equine Surveys (June 2025)

Northbound				Southbound				Two-way			
Peds	**Cyclists**	**Equine**	**Total**	**Peds**	**Cyclists**	**Equine**	**Total**	**Peds**	**Cyclists**	**Equine**	**Total**
15	5	0	19	12	3	0	16	**27**	**8**	**0**	**35**

Table 3.6 – Stone Wood Lane (west of Jenkyn Lane) - Ped/Cycle/Equine Surveys (June 2025)

Northbound				Southbound				Two-way			
Peds	**Cyclists**	**Equine**	**Total**	**Peds**	**Cyclists**	**Equine**	**Total**	**Peds**	**Cyclists**	**Equine**	**Total**
9	4	0	14	12	3	0	15	**21**	**8**	**0**	**29**

3.3.16 The TPS surveys show that a slightly greater use was recorded on Shepley Road, when 27 pedestrian and 8 cycle two-way movements were observed over the 12-hour period i.e. a total of 35 two-way non-motorised users per day. On average this equates to a total of 3 two-way non-motorised users per hour.

3.3.17 The June 2025 TPS surveys, which were undertaken during the summer, show lower non-motorised user movements than those recorded by Optima in Sep/Oct 2025. It is concluded that the Optima pedestrian/cycle/equine surveys are therefore valid and provide a worst-case assessment.

3.3.18 The Council's SoC Appendix 1 report comments that the Sep/Oct 2025 surveys do not pick up non-motorised users at the two footway crossover points on Stone Wood Lane located at the eastern and western edges of the wood. However, the TPS surveys do pick up these locations (shown on the Figure in Appendix B), which were surveyed on Tuesday 3rd and Thursday 5th June 2025 between the hours of 07:00 and 19:00. The results of the surveys show that:

- For the Footpath Crossover at the eastern edge of the wood:
  - to the east of the crossover point 18 and 16 two-way NMU's were recorded on Stone Wood Lane during the Tuesday and Thursday 12-hour periods respectively. This equates to 1.5 two-way NMU movements per hour on average; and

- to the west of the crossover point 16 and 14 two-way NMU's were recorded on Stone Wood Lane during the Tuesday and Thursday 12-hour periods respectively. This equates to less than 1.5 two-way NMU movements per hour on average.

- For the Footpath Crossover at the western edge of the wood:
  - to the east of the crossover point 16 and 11 two-way NMU's were recorded on Stone Wood Lane during the Tuesday and Thursday 12-hour periods respectively. This equates to less than 1.5 two-way NMU movements per hour on average; and
  - to the west of the crossover point 28 and 24 two-way NMU's were recorded on Stone Wood Lane during the Tuesday and Thursday 12-hour periods respectively. This equates to 2 two-way NMU movements per hour on average.

3.3.19 It can therefore be concluded that:

- The highest number of NMU users recorded at the two footpath crossovers is well below the quantum surveyed on Shepley Road in September 2025 i.e. 28 two-way movements per day at the western crossover point versus 52 on Shepley Road;
- The Shepley Road survey represents a worst case assessment of NMU users travelling along the length of the Stone Wood Lane corridor as clearly some users will only travel a partial length and turn back or walk to the crossover points to access the off-road footpaths – this is clearly demonstrated at the western crossover survey point where between 24 and 28 NMU's were recorded to the west of the crossover point i.e. the Stocksmoor side and only around half this figure (11 to 16) continued along Stone Wood Lane to the east.

3.3.20 The Council's SoC Appendix 1 (para 15) comments that (my underlining) "*the LPA notes that the data for the AM weekday peak hour period indicates lower active travel flows than for the hours on either side of this time period, which provide some evidence (but of limited weight due to the deficiencies with the data and being only a snapshot of user activity) that active travel users are already avoiding Stone Wood Lane during this busier weekday AM network peak traffic period*". The reason for this is that the majority of pedestrian/cycle movements along Stone Wood Lane are leisure trips including dog walkers and cycle enthusiasts, many of whom I have observed on site. And leisure trips are generally undertaken outside of peak hour commuting/school-run periods.

Traffic Surveys of Stocksmoor Village

3.3.21 Surveys have been undertaken within Stocksmoor to determine a bespoke traffic distribution and trip generation for residents of the existing village. This is the preferred approach to assessing traffic generated by the proposed development because it is based on empirical evidence that takes into account the Site's location within Stocksmoor, the location/availability of local facilities and the accessibility to public transport.

3.3.22 The approach is supported by Planning Practice Guidance (PPG) in relation to the preparation of 'Travel Plans, Transport Assessments and Statements' (CD 7.8) where it states in paragraph 006 that these documents should be "*proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible*" and "*be tailored to particular local circumstances*". (my underlining)

3.3.23 A bespoke approach to determining residential trip rates and traffic distribution is also often advocated by LHA's including Kirklees Council. For example, on a residential scheme on Bankfield Drive, Holmebridge (Ref: 2023/91212), which both Mr Darwin and I worked on, the LHA pre-app advice (copy in Appendix E) was to obtain "*vehicle turning count data at the Bankfield Drive and Laithe Bank Drive junctions to consider the likely traffic distribution to/from the development site*" (my underlining).

3.3.24 The bespoke Stocksmoor surveys were undertaken on Tuesday 11th and Wednesday 12th November 2025 between the hours of 07:30 to 09:30 and 16:00 to 18:00. I went through a process of reviewing and checking the data and received the finalised version that I was content with in January 2026. The data is provided in Appendix F along with a methodology summary and reference plans.

3.3.25 The village of Stocksmoor has been split into 7 zones which are shown on the plan attached at Appendix F. The total number of dwellings within the surveyed zones is 104. Nine cameras were erected within these zones (in the locations shown on the plan) to record the traffic movements associated with the residential properties i.e. the residents that live there as well as any visitors, deliveries, work vans etc. These traffic movements were then tracked (using the sequence of cameras) to determine their route into and out of the village, using the following four cordon points as shown on the plan

- North – Station Road;
- East – Shepley Road;
- South – Fulstone Road; and
- West – Stocks Moor Road.

3.3.26 A detailed description of the Stocksmoor residential survey results is included within Sections 6.4 and 6.5 of my proof.

3.4 Existing Personal Injury Accident Data

3.4.1 Personal injury accident data for the local highway network has been obtained from Leeds City Council (acting as the Recording Authority) for the most recently available 15-year period, which includes information recorded between the 1st July 2010 and the 30th June 2025.

3.4.2 As advised within national Planning Practice Guidance (PPG) an assessment of injury accident records is only required over a three to five year period, when considering the local highway network close to a new site access (Ref: Paragraph 014 of the 'Travel Plans, Transport Assessments and Statements' category within PPG – CD 7.8). The analysis of a 15-year period therefore far exceeds the requirements of national planning guidance.

3.4.3 The area for which the injury accident data was requested is shown on the figure contained in Appendix H and extends along the full length of the Shepley Road/Stocksmoor Lane corridor up to and including the Station Road/Cross Lane and Jenkyn Lane/Jos Lane junctions to the west and east respectively – a distance of some 1.2km. The information received from the Council, including a location plan, is provided in Appendix H.

3.4.4 The data shows that during the 15-year period there has been just one personal injury accident recorded within the study area. This was classed as being 'slight' in nature and occurred on Station Road near to the Shepley Road/Cross Lane junction when a car travelling southbound on Station Lane collided with another car turning left out of Cross Lane onto Station Lane. The incident report notes that a 'failure to judge another person's path or speed' was a likely contributory factor to the accident. This one accident is remote from the Stone Wood Lane corridor and has no bearing on RfR1.

3.4.5 No personal injury accidents, including pedestrians, cyclists and horse riders, have been recorded over the 15-year period along the entire circa 1.2km length of the Shepley Road/Stone Wood Lane corridor.

3.4.6 Whilst any accident is regrettable, it can be concluded from the lack of any recorded personal injury accidents over the extent of Stone Wood Lane, over the extended 15-year period, that there are no specific evidential causes for concern relating to existing highway safety. This being the case, it is clear that despite its non-standard width and geometry and given the recorded instances of use by pedestrians, cyclists and those on horseback, Stone Wood Lane operates safely in practice.

3.4.7 Furthermore, the highway improvement measures proposed along Stone Wood Lane (refer to Chapter 7) will serve to benefit highway safety for both existing and new users alike.

3.4.8 The Council's SoC Appendix 1 report confirms that the personal injury accident data information along the Stone Wood Lane/Shepley Road corridor, as provided in the Appellants SoC (and now in my PoE Appendix H), is correct. The LHA then suggests that the data is lacking because it only includes incidents that resulted in a personal injury and does not include 'damage only' accidents.

3.4.9 However, the Council present no data of their own to support this position aside from a reference to the 'Reported Road Casualties Great Britain' document which is meaningless in relation to any accidents that may have occurred along Stone Wood Lane/Shepley Road. Furthermore, it is highly likely that any impact between a vehicle and a pedestrian/cyclist/horse rider would result in a personal injury and therefore, as confirmed by the data received, no such incidences have occurred.

3.4.10 In summary, the Councils SoC comments do not affect the outcome of my findings or conclusions on this matter.

4 Development Proposals

4.1 Introduction

4.1.1 This chapter describes the development proposals including the Site access arrangements off Shepley Road.

4.2 Development Proposals

4.2.1 The submitted planning application is for a residential development of 50 dwellings with associated access, parking, public open space, landscaping and infrastructure – as shown on the Site Layout drawing (Ref: CD 1.5).

4.3 Proposed Shepley Road/Site Access Arrangements

4.3.1 Access to/from the Site for all transport modes is proposed from a new simple priority 'T' junction on Shepley Road. The works are shown on the drawing included within Appendix B of the TPS April 2025 TA Addendum report (CD 1.33) and comprise the following:

- A slight realignment (into the Site) of the Shepley Road carriageway, thereby improving forward visibility for all drivers travelling around the bend;
- Widening of the Shepley Road carriageway around the bend up to 7.5m, thereby improving vehicle swept path tracking for larger vehicles accessing the development Site such as a refuse vehicle;
- Provision of a 2.0m wide footway on the northern (Site) side of Shepley Road. The footway extends along the length of the Site frontage, including the provision of dropped crossings and tactile paving across the Site access, connecting to the existing Shepley Road footway to the west of the Site boundary;
- 5.5m wide Site Access carriageway with 2.0m footways to both sides;
- 7.0m junction radii; and
- Closure of the existing field gate access to the Site.

4.3.2 As confirmed in the delegated planning report the principle of the site access arrangements is considered by the Council to be appropriate and whilst they have not been subject to an agreed Stage 1 Road Safety process, the LHA are satisfied that a suitable access arrangement is achievable, and any additional changes (and the required Stage 1 Road Safety Audit, which may identify these) can be controlled via a suitably worded condition. This is a very normal approach in my experience.

4.3.3 The proposed off-site highway improvements along Stone Wood Lane are described in Chapter 7.

4.4 Construction Access

4.4.1 Construction access to the Site would be from Shepley Road with all HGV movements prohibited from utilising Stone Wood Lane to the east.

4.4.2 During the construction phase a Construction Management Plan (CMP) will be implemented which will address/mitigate any potential impacts arising from the development and ensure that the Site operates efficiently and safely. For example, the CMP will address construction hours of operation, treatment of delivery vehicles (wheel washing requirements, sheeting etc) and access routes to/from the Site. The CMP would be secured by a suitably worded planning condition.

5 Site Accessibility and Sustainability

5.1 Introduction

5.1.1 This chapter describes the accessibility and sustainability of the Site by non-car modes.

5.2 Accessibility by Foot and Cycle

5.2.1 The footways on Shepley Road and Station Road provide routes for residents of the Site to walk to the facilities in Stocksmoor within a 5 to 7 minute walk. These facilities include the Clothiers Arms pub, the Village Hall (which hosts various activities/events), the railway station and bus stops.

5.2.2 There is also a network of footpaths and Public Rights of Way within the local area that provide accessible leisure, fitness and dog walking opportunities including two footpath routes into the woods, located some 300m south of the south of the Site on Shepley Road on the bend where it becomes known as Stone Wood Lane.

5.2.3 The Site lies adjacent to the Shepley Road/Stone Wood Lane corridor, which forms part of the National Cycle Network (NCN) Route 627 which runs between Kirkburton to the north and Millhouse Green (via Shepley) to the south.

5.3 Accessibility by Rail

5.3.1 Stocksmoor railway station lies adjacent to the northern boundary of the Site and can be reached within a short 6-minute walk from a central point within the proposed development. The station has a 6 space car park, ticket machines, a seated area, CCTV and 3 lockers provided as cycle parking within the car park.

5.3.2 The station lies on the Penistone Line which operates between Huddersfield and Sheffield, calling at a number of stations which include:

- Lockwood;
- Berry Bow;
- Honley;
- Brockholes;
- Shepley;
- Denby Dale;
- Penistone;
- Silkstone Common;
- Dodworth;
- Barnsley;
- Wombwell;
- Elsecar;
- Chapeltown; and
- Meadowhall.

5.3.3 Between Monday and Saturday there are hourly services with the first and last trains to Huddersfield leaving Stocksmoor at 06:34 and 23:41 respectively. The first service of the

day to Sheffield leaves at 06:27 and the last at 23:06. On a Sunday, hourly services are maintained to Huddersfield and Sheffield, operating between 09:24 and 20:38. Approximate journey times to key destinations are as follows:

- Shepley – 2 minutes;
- Huddersfield - 22 minutes;
- Barnsley – 33 minutes;
- Meadowhall – 58 minutes; and
- Sheffield – 67 minutes.

5.4 Accessibility by Bus

5.4.1 The nearest bus stop to the proposed development is located on Cross Lane, a 250m distance to the west of the Site, which can be reached within a short 3-minute walk from a central point within the development Site.

5.4.2 The stop is served by service 341, which is operated by South Pennine Community Transport on a loop between Stocksmoor and Huddersfield.

5.4.3 During weekdays, the bus service generally operates every two hours or so with 8 services in total per day. The first service is timetabled to leave Stocksmoor at 06:40, arriving at Huddersfield for 7:10 i.e. a 30-minute journey time. The last service of the day leaves Stocksmoor at 20:06, arriving to Huddersfield for 20:40 – a slightly longer 34-minute journey. On a weekday, the first and last bus services leave Huddersfield at 07:15 and 19:30 respectively, arriving back at Stocksmoor for 07:47 and 20:04.

5.4.4 On a Saturday, there are 7 services a day, commencing from 07:50 and running through until 20:06 with a service approximately every 2 hours. The last bus to leave Huddersfield is at 19:30. There are no bus services on a Sunday however, the railway station provides the opportunity for Stocksmoor residents to still travel to/from Huddersfield by public transport.

5.4.5 In addition to bus service 341, there are two school bus services that run to/from Stocksmoor:

- Service K82 runs between Almondbury and Kirkburton Middle School. In the morning, the service departs from Stocksmoor Rail Station at 08:32 and arrives at Kirkburton School at 08:45. In the afternoon, the bus departs the school at 15:50 and arrives at Stocksmoor Rail Station at 16:00.
- Service K85 runs between Almondbury and Shelley College. In the morning, the service departs from Stocksmoor Rail Station at 07:33 and arrives at Shelley

College at 08:00. In the afternoon, the bus departs the college at 15:15 and arrives at Stocksmoor Rail Station at 15:38.

5.5 Accessibility to Local Facilities

5.5.1 The facilities within Stocksmoor i.e. the pub, village hall, railway station and bus stops are within comfortable walking/cycling distance of the development Site.

5.5.2 It is recognised and accepted that some residents of the development Site will access the facilities within Shepley by car, such as the primary school, co-op food store and health centre. However, these trips will be minimal and have been fully accounted for in my bespoke assessment of development traffic generations along Stone Wood Lane (as detailed within Chapter 6 of this proof).

5.5.3 Furthermore, alternative facilities to those in Shepley are located elsewhere within the local area which do not require the use of Stone Wood Lane. For example:

- Thurstonland Endowed First School, Shelley First School and Farnley Tyas CE First School can all be reached within a similar journey time by car (compared to Shepley First School) and do not require the use of Stone Wood Lane;
- Other small convenience foodstores similar to the small Co-Op in Shepley are located in nearby villages such as the Morrisons Daily in Shelley and the Co-Op in Kirkburton. Car journey times to these alternative convenience stores is a little longer than to Shepley but only by 2 to 3 minutes. Furthermore, such small convenience stores are often used as a top-up shop (as opposed to a large weekly shop at a large supermarket) and this can be undertaken as part of another journey i.e. travelling to/from work and not as a single purpose trip;
- Other health care facilities (GP, pharmacy, dentist) are available such as the Health Centre in Kirkburton. The car journey time to Kirkburton is a little longer than to Shepley but only by 3 to 4 minutes. Furthermore, visits to the dentist, doctors and pharmacy are not regular events and generate relatively few trips – they are often also undertaken as part of another journey i.e. travelling to/from work.

5.5.4 There are of course many other key trip attractors that are not located in Shepley which generate trips by Stocksmoor residents (some on a regular daily/weekly basis) that do not therefore require the use of Stone Wood Lane, such as a secondary school, large supermarket, hospital, bank, major shopping centre, permanent post office (currently a mobile, limited service in Shepley), cinema and significant employment opportunities.

5.6 Site Accessibility Summary

5.6.1 The close proximity of both the railway station and the bus service will provide residents of the Site with convenient, walkable access to regular public transport services, which operate throughout the day and enable travel to key regional destinations that offer extensive facilities, services, shops, leisure activities and employment opportunities. These destinations include Huddersfield, Barnsley and Sheffield, which can be reached within 22, 33 and 67 minutes respectively by rail. Stocksmoor itself provides some walkable local facilities (pub and village hall) and additional services/shops can be reached by cycle in nearby villages other than Shepley.

5.6.2 As such the Site is in a sufficiently sustainable location for the development proposed, and as Mr Johnson explains, this was also determined by the Local Plan process, which looked at a range of sites and factors, and allocated land for housing in Stocksmoor now and for future development. It follows the Site's location is compliant with the NPPF which requires at paragraph 110 that people are offered "*a genuine choice of transport modes*". Noting also the last sentence of paragraph 110 which states that "*opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making*."

5.6.3 The Council recognise and acknowledged the beneficial elements of the Site's location and concluded that the Site is "*sustainable for residential development*" and "*is accessible*". The following relevant extracts are taken from the Council's Delegation Report (CD 3.1):

> *"The site is within walking distance of numerous bus stops that connect the development to the wider area, including Huddersfield Town Centre that in turn connects to the greater region. Officers note that the site is within close proximity to Stocksmoor Railway Station and so the site is reasonably well served by public transport"*
>
> *"The site is within the urban envelope, albeit on the edge of the settlement, within a location considered sustainable for residential development. It is accessible, lying within an existing established settlement and close to various local amenities and facilities. At least some, if not all, of the daily, economic, social and community needs of residents of the proposed development can be met within the area surrounding the application site, which further indicates that residential development at this site can be regarded as sustainable."*

5.6.4 Within the current working draft of the Statement of Common Ground (SoCG) it is also agreed with the Council that the Site is in a "*sustainable and accessible location*", "*is accessible by public transport*" and "*the sustainability of the site's location is not a basis for refusal*".

5.6.5 It is also worth noting that through the identification of housing allocations (HS192 and HS199 on Cross Lane) and safeguarded land (SLS29 and the appeal Site SLS30) in the settlement of Stocksmoor through the Local Plan, there is an acknowledgement by the Council that the settlement has capacity to accommodate additional growth and is sustainable and accessible.

5.6.6 The accessibility of the development Site to local facilities and public transport is fully recognised and taken into account within the development traffic generations I have calculated (details in Chapter 6) which are based on a bespoke traffic survey of existing Stocksmoor residents. Furthermore, the results of this assessment (that the proposed development will generate 30 two-way vehicle movements in the peak hour) is just 2 vehicle movements less than the 32 two-way development trips now predicted to be generated by the Council within their SoC (Appendix 1) i.e. the peak hour development trips predicted by the Appellant and the Council, which reflect the accessibility and sustainability of the Site, are very similar.

6 Traffic Flows

6.1 Introduction

6.1.1 This chapter sets out the base traffic flows, details of the vehicular trips generated by the development and the distribution of that traffic on the local highway network. It also considers the material impact of the predicted development trips on the Shepley Road/Stone Wood Lane corridor.

6.2 Existing Traffic Survey Flows

6.2.1 As described within Chapter 3, traffic surveys of the Shepley Road/Stone Wood Lane corridor have been undertaken in September 2025 and the resulting average weekday peak hour flows (two-way) are as follows:

- 65 vehicles during the morning peak hour 08:00 to 09:00; and
- 74 vehicles during the evening peak hour 17:00 to 18:00.

6.3 Base Traffic Flows

6.3.1 Traffic growth is based on a combination of proposed future developments, car ownership and changing attitudes in the way people use and have access to their vehicles.

6.3.2 Based on a typical build out rate of 30 to 35 dwellings per annum then the proposed development would be completed within less than two years. Allowing for the planning/appeal process then 2030 is considered to represent a realistic future design year.

6.3.3 Background traffic growth rates between 2025 and 2030 within the local area surrounding the site have been determined using the latest Tempro 8.1 software (included within Appendix I). The resulting values (averaged for both the Kirklees 051 and 056 Output Areas which are representative of the Site because it is located on the boundary between the two) for the AM and PM peak hours are:

- AM Tempro Traffic Growth Rate: 1.052; and
- PM Tempro Traffic Growth Rate: 1.052.

6.3.4 The Tempro growth rate predicts a peak hour traffic increase of 5.2% during the AM and PM peak hours. These growth rates have been applied to the 2025 surveyed counts to produce the 2030 Base Traffic Flows along the Stone Wood Lane corridor - as shown in Table 6.1. Within their SoC Appendix 1 report the Council confirms that both the future design year of 2030 and the proposed 5.2% growth rates are accepted by the LPA.

Table 6.1 Shepley Road/Stone Wood Lane Corridor - 2030 Base Traffic Flows

Time Period	Two-Way Vehicle Movements
AM Peak Hour (08:00 to 09:00)	69
PM Peak Hour (17:00 to 18:00)	78

6.4 Proposed Development Vehicular Trip Generation

6.4.1 The original 2024 Transport Assessment prepared by AMA (CD 1.23) utilised the industry standard TRICS database to determine peak hour vehicular trip rates of 0.514 and 0.477 vehicles/dwelling during the busiest morning and evening peak hours. The second highway consultant (TPS) also utilised the TRICS database and within their TA Addendum (CD 1.33) they proposed similar but slightly higher AM and PM peak hour vehicular trip rates of 0.518 and 0.516 vehicles/dwelling respectively.

6.4.2 Despite determining vehicular trip rate values of 0.518 (AM) and 0.516 (PM) from TRICS in their TA Addendum report, TPS then proceeded to apply a 'sensitivity test' trip rate of 0.7 two-way vehicle movements per dwelling for the remainder of their analysis. A trip rate of 0.7 is also the value that the Council considered in the April 2025 consultation response (CD 4.16) and advised TPS to utilise (as confirmed in para 41 of the Council's SoC Appendix 1).

6.4.3 The Council's SoC (Appendix 1) now proposes a reduced 0.63 veh/dwelling trip rate, which is obtained by applying a 10% reduction to the original 0.7 value. It is unclear where the original 0.7 trip rate value has come, but it appears to be unjustified and not supported with any evidence. Similarly, the 10% reduction now applied is arbitrary and neither derived from empirical evidence or TRICS.

6.4.4 Whilst I disagree with the Council's approach to determining development trip rates, and explore this a little further within the Note contained in Appendix G, ultimately (as set out in the following section) the difference between myself and the Council with respect to the predicted development traffic generations is very small and relatively immaterial (just 2 vehicle movements difference in the peak hour).

6.4.5 The HTS appended to the appellants SoC also included a TRICS based analysis and determined peak hour vehicular trip rates of 0.555 and 0.559 vehicles/dwelling during the busiest morning and evening peak hours – slightly higher than the TPS values.

6.4.6 Since completion of the TRICS based work in the SoC I have instructed surveys to be undertaken within Stocksmoor to determine a bespoke residential traffic trip rate/generation. The survey is described in Chapter 3 and is the preferred approach to assessing traffic generated by the proposed development because it is based on empirical evidence that takes into account the Site's location within Stocksmoor, the location/availability of local facilities and the accessibility to public transport.

6.4.7 The following section describes the trip rate results of the bespoke Stocksmoor village survey and for completeness, I have then also summarised the TRICS based trip rate assessment which was previously completed and included in the Appellants SoC.

Development Trip Generation Methodology using Stocksmoor Village Survey

6.4.8 The Stocksmoor village survey has been utilised to determine a bespoke residential vehicular trip rate that can then be applied to the development Site to predict the number of vehicular trips that would be generated by the proposed 50 dwellings. Such a methodology most accurately predicts development trips because it reflects the existing travel behaviours of Stocksmoor residents and takes into account the location and accessibility of the Site to public transport as well as to local services, facilities and employment opportunities.

6.4.9 The traffic surveys were undertaken between the hours of 07:30 to 09:30 and 16:00 to 18:00 on Tuesday 11th and Wednesday 12th November 2025 and recorded all vehicular movements associated with 104 existing dwellings within Stocksmoor (movements associated with any other uses or 'through' traffic movements have been excluded from the survey – as described in Chapter 3 and the methodology in Appendix F). The morning and evening peak hour traffic movements occurred at the following differing times on each day:

Tuesday 11th November

- AM Peak Hour – 08:15 to 09:15
- PM Peak Hour – 16:00 to 17:00

Wednesday 12th November

- AM Peak Hour – 08:30 to 09:30
- PM Peak Hour – 16:15 to 17:15

6.4.10 The resulting residential traffic flows surveyed during these peak hour periods, which represent the highest surveyed hourly traffic movements, are shown in Table 6.2.

Table 6.2 Stocksmoor Residential Survey - Peak Hour Traffic Flows

Tuesday 11th November 2025 (vehicles)				Wednesday 12th November 2025 (vehicles)			
Peak Hour	**Arrive**	**Depart**	**Two-Way**	**Peak Hour**	**Arrive**	**Depart**	**Two-Way**
Morning Peak Hr (08:15 to 09:15)	23	40	**63**	Morning Peak Hr (08:30 to 09:30)	23	36	**59**
Evening Peak Hr (16:00 to 17:00)	32	30	**62**	Evening Peak Hr (16:15 to 17:15)	39	20	**59**

6.4.11 Dividing the existing traffic movements shown in Table 7.2 by the number of dwellings surveyed (104) provides the bespoke morning and evening peak hour vehicular trip rates for Stocksmoor village – as shown in Table 6.3.

Table 6.3 Stocksmoor Residential Survey - Peak Hour Vehicular Trip Rate per Dwelling

Tuesday 11th November 2025				Wednesday 12th November 2025			
Peak Hour	**Arrive**	**Depart**	**Two-Way**	**Peak Hour**	**Arrive**	**Depart**	**Two-Way**
Morning Peak Hr (08:15 to 09:15)	0.221	0.385	**0.606**	Morning Peak Hr (08:30 to 09:30)	0.221	0.346	**0.567**
Evening Peak Hr (16:00 to 17:00)	0.308	0.288	**0.596**	Evening Peak Hr (16:15 to 17:15)	0.375	0.192	**0.567**

6.4.12 As shown in Table 6.3 the Stocksmoor traffic surveys produce a slightly higher bespoke residential trip on the Tuesday (0.596 to 0.606 veh/dwelling) than the Wednesday (0.567 veh/dwelling) but the values are all relatively consistent. Applying the proposed 50 dwellings to the bespoke trip rates in Table 6.3 gives the proposed peak hour development traffic flows shown in Table 6.4.

Table 6.4 Proposed Development Traffic Generations (using bespoke trip rates)

Tuesday 11th November 2025 (vehicles)				Wednesday 12th November 2025 (vehicles)			
Peak Hour	**Arrive**	**Depart**	**Two-Way**	**Peak Hour**	**Arrive**	**Depart**	**Two-Way**
Morning Peak Hr	11	19	**30**	Morning Peak Hr	11	17	**28**
Evening Peak Hr	15	14	**30**	Evening Peak Hr	19	10	**28**

6.4.13 As shown in Table 6.4 the Stocksmoor surveys produce a slightly higher bespoke development peak hour trip generation of **30 two-way vehicles** using the Tuesday trip rate data and **28 vehicles** using the Wednesday data.

Development Trip Generation Methodology using TRICS Database

6.4.14 Prior to completing the Stocksmoor traffic surveys, development trip rates/generations were determined using the TRICS (Trip Rate Information Computer System) national database and set out in the Highways & Transportation Statement (HTS) appended to the Appellants Statement of Case. This information is also included here for completeness.

6.4.15 The TRICS 8.25.6 online database has been interrogated to determine an average residential vehicular trip rate. The time periods selected are the weekday morning (08:00 to 09:00) and evening (17:00 to 18:00) peak hour periods. The TRICS outputs are attached at Appendix J. Survey sites within the database have been chosen using the following parameters:

- Land use: Residential, Houses privately owned;
- Calculation options: Vehicular trip rates selected;
- Trip Rate Parameters: Number of Dwellings: 4-500;
- Date range: 23rd March 2016 to 18th September 2024 (excluding Covid Sites);
- Days included: Monday to Friday; and
- Location Type: Suburban Area.

6.4.16 The resulting peak hour vehicular trip rates are summarised in Table 6.5.

Table 6.5 – TRICS Vehicular Trip Rates

Time Period	Vehicular Trip Rates (per dwelling)		
	Arrivals	Departures	Total
Morning Peak Hour	0.127	0.428	0.555
Evening Peak Hour	0.372	0.187	0.559

6.4.17 Applying the TRICS trip rates in Table 6.5 to the proposed 50 dwellings results in the morning and evening peak hour traffic generations set out within Table 6.6.

Table 6.6 Proposed Development Traffic Generations (using TRICS)

Time Period	Vehicular Trip Generations (50 dwellings)		
	Arrivals	Departures	Total
Morning Peak Hour	6	22	**28**
Evening Peak Hour	19	9	**28**

6.4.18 As shown in Table 6.6 the TRICS database methodology predicts a development peak hour generation of **28 two-way vehicle movements** throughout the busiest weekday

morning and evening peak hours. This accords with the bespoke Stocksmoor survey for the Wednesday and is 2 vehicles per hour less for the Tuesday survey. The two methods corroborate each other very well.

Development Trip Generation Summary

6.4.19 Two methodologies have been applied to determine the predicted volume of traffic generated by the proposed development, one utilising a bespoke survey of existing properties within Stocksmoor and a second utilising the national TRICS database. Both are equally valid and produce very similar results i.e. development peak hour trip generations of between 28 and 30 two-way vehicles.

6.4.20 Due to the empirical and bespoke nature of the methodology, the remainder of my assessment in this PoE is based on a **development traffic generation of 30 two-way vehicle movements in the peak hours**, determined from the Stocksmoor village surveys.

6.4.21 This figure is just 2 vehicle movements less than the 32 two-way peak hour development trips now predicted to be generated by the Council within their SoC (Appendix 1) – noting that this represents a reduction from the 35 trip figure previously supported by the Council and relied on to underpin the decision to refuse planning permission in the first place i.e. the unevidenced 'sensitivity test' 0.7 trip rate multiplied by 50 dwellings.

6.5 Proposed Development Traffic Distribution

6.5.1 The original 2024 Transport Assessment prepared by AMA (CD 1.23) utilised a census based distribution methodology but assumed that all journey types were employment/work related. AMA concluded that 3.8% of development traffic would route along Stone Wood Lane but also suggested a 20% sensitivity test scenario.

6.5.2 The second highway consultant (TPS) based their distribution methodology on 2022 National Travel Survey (NTS) data for England, which shows that 54% and 47% of development generated trips are education related during the morning 08:00 to 09:00 peak hour – they then applied these same percentages to the distribution of all development related traffic along Stone Wood Lane. The NTS data was first suggested in the Councils 2024 consultation response (CD 4.14), as referenced in the TPS TA Addendum (para 4.7).

6.5.3 The distribution methodology, as previously proposed by TPS (and supported by Kirklees Council) to apply to development traffic, is fundamentally flawed and incorrect for the following numerous reasons:

- It is based on National Travel Survey (NTS) data which covers all transport modes, as opposed to just vehicular trips. This will inevitably produce a higher proportion of education related trips because it includes walking etc;
- TPS applied the same AM peak hour 47% to 54% distribution to the highway network PM peak hour of 17:00 to 18:00. This is clearly incorrect because the proportion of education related trips is very low during this hour i.e. by 17:00 the vast majority of pupils have long left school and already arrived at home. This is verified within the NTS data table itself with a value of 5% of trips being education related during the 17:00 to 18:00 period (refer to table in 14/10/24 Council consultation response – CD 4.14). And further verified in the assessment I undertook (included in Appendix K of this proof) which also confirms that just 5% of trips are education related during the PM peak hour;
- The NTS data is generic covering the whole of England and clearly not bespoke to the proposed Site, for which travel patterns could be markedly different;
- It has been assumed that the 47% to 54% distribution along Stone Wood Lane applies to all development journeys i.e. not just education related trips; and
- It has been assumed that all 47% to 54% of development trips route to Shepley along Stone Wood Lane. Clearly, some education related trips will travel along different routes.

6.5.4 Within the April 2025 TA Addendum, TPS concluded that "*it is not expected that education trips would be to/from Shepley and therefore, the undertaking of these trips would have limited impact on this route*" i.e. Stone Wood Lane. However, despite this conclusion they then applied the flawed 47% to 54% 'education' derived trips to all other journey purposes including commuting, shopping, other work, other escort/personal business, visiting friends, entertainment and sport. This is another significant, incorrect and unsubstantiated assumption.

6.5.5 The Council accepted and adopted all these flaws and unevidenced assumptions and applied the 47% to 54% distribution of development trips along Stone Wood Lane within their second (April 2025) consultation response (CD 4.16). The LHA have also maintained this position in the Council's SoC Appendix 1 (ref para 39) but for simplicity, have adopted a central 50% traffic distribution along Stone Wood Lane.

6.5.6 I disagree with the Council's approach to determining development traffic distributions for all the above reasons.

6.5.7 The HTS appended to the appellants SoC set out a methodology for determining development traffic distribution based on calculating trip generations by journey purpose. Since the completion of the SoC I have instructed surveys to be undertaken within Stocksmoor as a checking mechanism, to determine a bespoke residential traffic trip distribution and to see if this would corroborate my earlier approach. The surveys are described in Chapter 3 and provide the preferred approach to assessing the development traffic distribution because they are based on empirical evidence that takes into account the location of, and route to, surrounding facilities, services, leisure and employment opportunities i.e. what the residents of Stocksmoor are doing now for all vehicular journey purposes from/to Stocksmoor.

6.5.8 The following section describes the trip distribution results of the bespoke Stocksmoor village survey and for completeness, I have then also summarised the 'journey purpose' trip distribution assessment which was previously completed and included in the Appellants SoC.

Development Traffic Distribution Methodology using Stocksmoor Village Survey

6.5.9 In addition to establishing trip rates, the Stocksmoor village survey described in Chapter 3 has also been utilised to determine a bespoke residential vehicular distribution that can then be applied to the development Site to predict the quantum of development traffic that will route along the Stone Wood Lane corridor.

6.5.10 The survey recorded the quantum of residential traffic that routed to/from each of the following four cordon points located around the village:

- North – Station Road;
- East – Shepley Road;
- South – Fulstone Road; and
- West – Stocks Moor Road.

6.5.11 The residential traffic movements generated by the existing Stocksmoor dwellings during the busiest morning and evening peak hour periods are shown in Tables 6.7 and 6.8 for the surveyed Tuesday 11th and Wednesday 12th November respectively.

Table 6.7 Stocksmoor Residential Survey (Tuesday 11th Nov) - Existing Traffic Distribution

	Morning Peak Hour 08:15 to 09:15				Evening Peak Hour 16:00 to 17:00			
Route	**Arrive**	**Depart**	**Two-Way**	**% Distribution**	**Arrive**	**Depart**	**Two-Way**	**% Distribution**
North (Station Road)	5	11	16	**25.4%**	10	6	16	**25.8%**
East (Shepley Road/Stone Wood Lane)	8	7	15	**23.8%**	1	9	10	**16.1%**
South (Fulstone Road)	1	3	4	**6.3%**	3	3	6	**9.7%**
West (Stocks Moor Road)	9	19	28	**44.4%**	18	12	30	**48.4%**
Total =	**23**	**40**	**63**	**100%**	**32**	**30**	**62**	**100%**

Table 6.8 Stocksmoor Residential Survey (Wednesday 12th Nov) - Existing Traffic Distribution

	Morning Peak Hour 08:30 to 09:30				Evening Peak Hour 16:15 to 17:15			
Route	**Arrive**	**Depart**	**Two-Way**	**% Distribution**	**Arrive**	**Depart**	**Two-Way**	**% Distribution**
North (Station Road)	4	11	15	**25.4%**	16	9	25	**42.4%**
East (Shepley Road/Stone Wood Lane)	4	6	10	**16.9%**	2	7	9	**15.3%**
South (Fulstone Road)	2	2	4	**6.8%**	3	1	4	**6.8%**
West (Stocks Moor Road)	13	17	30	**50.8%**	18	3	21	**35.6%**
Total =	**23**	**36**	**59**	**100%**	**39**	**20**	**59**	**100%**

6.5.12 The results in tables 6.7 and 6.8 show that the percentage of existing traffic travelling to/from Stocksmoor using Shepley Road/Stone Wood Lane (i.e. the east cordon point) is very similar across three of the four peak hour periods, lying in the range between **15.3% and 16.9%.** The fourth peak hour (AM on Tuesday 11th Nov) is slightly higher than this range at **23.8%** of traffic.

6.5.13 Applying these surveyed traffic distributions in tables 6.7 and 6.8 to the predicted development traffic generation of 30 two-way vehicle movements, gives the following **predicted development trips along the Stone Wood Lane corridor**:

- AM Peak Hour – **5 to 7 two-way development trips** (i.e. 0.169 & 0.238 x 30); and
- PM Peak Hour – **5 two-way development trips** (i.e. 0.153 & 0.161 x 30).

Development Traffic Distribution Methodology by Journey Purpose

6.5.14 Prior to completing the Stocksmoor traffic surveys, the development traffic distribution was determined by calculating trip generations by journey purpose (commuting, education, shopping, other) and then assessing the assignment of each trip purpose across the highway network. The full methodology was set out in the Highways & Transportation Statement (HTS) appended to the Appellants Statement of Case and has been provided in Appendix K of this PoE for completeness.

6.5.15 The results of this methodology are that the proposed development will generate a maximum of **7 two-way vehicular movements along Stone Wood Lane** during the busiest morning and evening peak hour periods. This represents **23.3%** of the total 30 development vehicle movements predicted, which is entirely corroborative of the empirical data and vice versa.

Development Traffic Distribution Summary

6.5.16 Two methodologies have been applied to determine the predicted distribution and number of development trips along Stone Wood Lane, one utilising a bespoke survey of existing properties within Stocksmoor and a second based on calculating trip generations by journey purpose.

6.5.17 Both are equally valid and comply with the NPPF policy test (para 116 and glossary definitions) to consider reasonable and realistic future scenarios. The distribution assessments produce very similar results giving a range of between **15.3% and 23.8% of development traffic travelling along Stone Wood Lane**, which equates to between **5 and 7 two-way vehicle movements** during the busiest peak hour periods.

6.5.18 It is worth noting that there are alternative, less direct routes to Shepley (via Stone Wood Lane) that Stocksmoor drivers can take if preferred.

6.5.19 Indeed, as advised in the 2024 KC consultation response (CD 4.14), a Stocksmoor resident survey (120 responses) confirms that when travelling to Shepley, 85% of people would use Stone Wood Lane i.e. 15% would not use Stone Wood Lane and choose an alternative route instead. In the consultation the Council comment that "*this appears to be a sensible and reasonable estimate*" and it is therefore also reasonable to assume that 15% of residents within the proposed development would make the same choice not to use Stone Wood Lane.

6.6 Design Traffic Flows

6.6.1 Adding the 2030 base traffic flows in Table 6.1 to the proposed development trips obtained from the empirical bespoke surveys produces the **2030 Design traffic flows of 74 to 76 and 83 vehicles along the Stone Wood Lane corridor during the busiest morning and evening peak hours** - as shown in Table 6.9.

6.6.2 Paragraph 7.2.14 of Manual for Streets (CD 7.3) advises that routes with around, or less than 100 vehicles per hour, are much more likely to operate satisfactorily as a shared space i.e. a street which pedestrians, cyclists and vehicles share the space, and where the non-vehicle users can do so without feeling intimidated by motor traffic. This matter is something that the Council also acknowledge and recognise because they state in Paragraph 63 of the SoC Appendix 1 that the 100 veh/hr value is "*a key threshold when considered* [sic] *shared surface highways*". (my underlining)

6.6.3 The predicted future peak hour design flows of 74 to 83 two-way vehicle movements are comfortably below the guideline 100 veh/hr figure stated in MfS.

Table 6.9 Shepley Road/Stone Wood Lane Corridor - 2030 Design Traffic Flows

Time Period	Two-way Vehicle Movements on Stone Wood Lane		
	2030 Base Flows	**Development Trips**	**2030 Design Flows** (% change)
AM Peak Hour (08:00 to 09:00)	69	**5 to 7**	**74 to 76** (7% to 10%)
PM Peak Hour (17:00 to 18:00)	78	**5**	**83** (7%)

6.6.4 The Council's SoC Appendix 1 (para 62) states that the LPA have produced their own 2030 Design Traffic flows, which they "*intend to refer to at the appeal to consider design parameters for Stone Wood Lane*", because the appellants 2030 Design Traffic flows presented in the SoC "*are not considered to be robust (as they do not consider the maximum average weekday peak hour flows from the three sets of ATC survey data, do not include a robust assessment of development traffic, and do not consider an additional scenario that considers design flows based on the current maximum recorded peak hour flows)".* (my underlining)

6.6.5 As described in Section 3.3, I disagree that maximum traffic flows should be used in the assessment of the Shepley Road/Stone Wood Lane corridor and my reasoning is set out in the Note included within Appendix G but fundamentally the Council's approach is flawed and does not accord with the NPPF. The Council's approach (as described above in para 62 of the SoC Appendix 1) is based on assessing the very 'maximum' values and being 'robust' – this does not comply and is contrary to national policy which requires that assessments should be based on reasonable and realistic future scenarios (NPPF para 116 and glossary definitions).

6.6.6 Notwithstanding this, even if the Councils maximum peak hour traffic flow values of 89 and 90 are utilised (as shown in table 4 of their SoC Appendix 1) then, adding my

proposed development trips obtained from the empirical bespoke surveys, produces 'Council Maximum' future design flows of 94 to 97 veh/hr (as shown in Table 6.10) – which is still below the guideline 100 veh/hr figure stated in MfS with respect to shared space use. Therefore, even if the Council's maximum traffic flow values are applied (which I do not agree with) it does not affect the outcome of my assessments, findings or conclusions with respect to the Stone Wood Lane/Shepley Road corridor.

Table 6.10 Shepley Road/Stone Wood Lane – Council's 'Maximum' 2030 Design Traffic Flows

Time Period	Two-way Vehicle Movements on Stone Wood Lane		
	Council Maximum Weekday Flows *	Development Trips	Council Maximum Design Flows (% change)
AM Peak Hour (08:00 to 09:00)	90	**5 to 7**	**95 to 97** (6% to 8%)
PM Peak Hour (17:00 to 18:00)	89	**5**	**94** (6%)

* taken from Table 4 of Council SoC Appendix 1

6.7 Material Impact

6.7.1 The previous national Guidance on Transport Assessments GTA document (now withdrawn) suggested that a development traffic generation of 30 two-way trips per hour represented an appropriate threshold figure above which an assessment may be required but below which the impact could be considered non-material. Whilst the Government's current Planning Practice Guidance (PPG) does not specifically refer to 30 two-way trips per hour this remains a threshold which is generally applied within the industry including by many local highway authorities and National Highways.

6.7.2 It is evident by any measure than an additional 5 to 7 two-way vehicular trips along Stone Wood Lane, which equates to one additional vehicle every 8½ to 12 minutes, represents a 'non-material' impact. Furthermore, in terms of the volume of development, the additional trips are certainly not 'severe' which is the test applied in paragraph 116 of the NPPF. The matter of unacceptable 'highway safety' referenced in the same paragraph of the NPPF is considered in Chapter 7.

6.7.3 As with any road, the traffic flows along Stone Wood Lane/Shepley Road vary on a day to day basis, as illustrated by the ATC surveys that have been undertaken (as described in section 3.3). The morning and evening weekday peak hour two-way flows along the Stone Wood Lane/Shepley Road corridor taken from the ATC surveys completed in December 2024 and September 2025 (as listed in Table 3.1 and included in Appendix B)

are shown in Table 6.11 below. The ATC's provide two weeks of data in separate months.

Table 6.11 - Shepley Road/Stone Wood Lane – Peak Hour Daily Flow Changes

	Two-way Weekday Traffic Flows (vehicles) – Taken from Site 1 (Sep 2025) ATC & Site 2 (Dec 2024) ATC Survey			
	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
	Two-Way Vehicle Flow	Difference in flow with day before (% change)	Two-Way Vehicle Flow	Difference in flow with day before (% change)
Monday 15/9/25	62	n/a	57	n/a
Tuesday 16/9/25	70	**+8** (13%)	73	**+16** (28%)
Wednesday 17/9/25	67	**-3** (4%)	84	**+11** (15%)
Thursday 18/9/25	62	**-5** (8%)	83	**-1** (1%)
Friday 19/9/25	50	**-12** (19%)	58	**-25** (30%)
Monday 16/12/24	71	**+17** (31%)	73	**+12** (20%)
Tuesday 17/12/24	63	**-8** (11%)	63	**-10** (14%)
Wednesday 18/12/24	64	**+1** (2%)	67	**+4** (6%)
Thursday 19/12/24	61	**-3** (5%)	48	**-19** (28%)
Friday 13/12/24	54	n/a	61	n/a

6.7.4 The results in table 6.11 show that, the majority of the flow comparisons (11 out of 16), vary by 5 to 25 vehicles (8% to 31% change) on a day to day basis. Such existing fluctuations are equivalent to, or substantially greater than, the predicted quantum of development traffic. Therefore, the proposed 5 to 7 vehicle increase (7% to 10% - or 6% to 8% of the Council's 'maximums' approach is applied) in development trips along the Stone Wood Lane/Shepley Road corridor would be difficult to perceive and would not have a material impact. The change would comfortably fall within the range of daily variations.

6.7.5 The Rule 6 SoC suggests that as vehicle flows increase on Stone Wood Lane, the incidence of vehicle conflicts would rise at a disproportionately faster rate. However, my evidence shows that that there has not been a single personal injury accident along the Stone Wood Lane/Shepley Road corridor over a 15 year period and of course during this time traffic flows have increased and decreased on a daily basis i.e. daily traffic flow fluctuations, which are similar to or even greater than the proposed development traffic generations, have not resulted in any change to the occurrence of personal injury incidents.

6.7.6 The Council's SoC Appendix 1 acknowledges that the 30 two-way trip threshold is often still used in certain circumstances, to determine materiality in the context of whether there is the need for an assessment of traffic effects at all, but the LPA does not consider it to be appropriate in this situation. Instead, the Council refer to the much older and also superseded 1994 IHT 'Guidelines for Traffic Impact Assessment' document which suggests that a traffic impact could be considered material where there is a 10% increase in traffic, or a 5% increase in sensitive locations. This is a crude measure when dealing with very low traffic flows, which is the case on Stone Wood Lane, because small fluctuations in flow produce a disproportionate and misleading percentage change. This is demonstrated in Table 6.9 where it is shown that development traffic increase on Stone Wood Lane lies between 7% and 10%.

6.7.7 Three materiality assessment methodologies have been considered, the 30 two-way trip threshold, comparison with existing daily fluctuations in traffic flows and the 5% to 10% increase in traffic threshold. The first two methodologies conclude that a development traffic increase of 5 to 7 vehicles per hour along the Stone Wood Lane/Shepley Road corridor does not represent a material impact. The third methodology, which I do not agree with, suggests that there may be a material impact if Stone Wood Lane is defined as a sensitive location.

6.7.8 Notwithstanding this, materiality assessments are of course just a gateway to ascertaining whether or not an analysis of a particular highway network is required, and if it is, whether or not the development impact justifies any mitigation measures. Despite concluding from the two materiality assessments that I have undertaken that the development will not have a material impact at all, I have still proceeded to undertake a detailed assessment of the Stone Wood Lane/Shepley Road corridor and proposed suitable and satisfactory highway mitigation measures. In other words, even on the Council's approach the furthest the matter takes us is that assessment is needed, and as assessment has been undertaken, that point goes no further.

6.7.9 It is also worth noting that through the identification of housing allocations (HS192 and HS199 on Cross Lane) and safeguarded land (SLS29 and the appeal Site SLS30) within Stocksmoor through the Local Plan, there is an acknowledgement by the Council that the settlement has capacity to accommodate additional growth, generate traffic on the local highway network and there is no mention of Stone Wood Lane being a constraint. Furthermore, it is noted that some other sites were removed from the Plan due to unsatisfactory access or impact on the local highway network – this is not the case for both of the Safeguarded Land sites in Stocksmoor which includes the appeal Site.

6.7.10 With respect to the Housing Allocation Site HS192 on Cross Lane (which has now been built and occupied) the 20/3/14 Kirklees Council Highways Development Control

consultation response to the outline planning application for 15 dwellings (Ref:2014/60/90460) stated that (my underlining) "*Cross Lane is a lightly trafficked unclassified road*" and concluded that "*these proposals are considered acceptable from a highways point of view and we have no wish to resist the granting of planning permission*". There is no reference to Stone Wood Lane and no concerns are raised regarding the development impact on the local highway network. A copy of the consultation response is provided in Appendix L.

7 Assessment of Stone Wood Lane/Shepley Road Corridor

7.1 Introduction

7.1.1 This chapter assesses the highway improvements proposed along the Stone Wood Lane corridor and their beneficial effect on all existing and future highway users including pedestrians and cyclists, not just those from the appeal site.

7.2 Existing Stone Wood Lane/Shepley Road Highway Layout & Operation

7.2.1 The Stone Wood Lane/Shepley Road corridor extends for some 1.07km between the junction of Jenkyn Lane (on the western edge of Shepley) and the Site. The drawings in Appendix M, which also include some photographs, show the layout of the existing highway over this length.

7.2.2 Figure 7.1 of Manual for Streets (CD 7.3) identifies that a minimum width of 4.1m is required for two opposing cars to pass each other and 4.8m is required to accommodate a car passing a large vehicle - this information is also included on page 35 of the Kirklees Highway Design Guide SPD (CD 6.6). Figure 6.18 of MfS also advises on the typical dimensions of various vehicles including a family saloon car which has a width of 1.8m (excluding wing mirrors) and 2.0m (with wing mirrors). This corroborates the 4.1m width required for two cars to pass each other i.e. dimensions of two cars is 2 x 2.0m equals 4.0m.

7.2.3 Manual for Streets 2 (CD 7.4) further endorses the 4.1m and 4.8m widths, stating at paragraph 8.6.4 that (my underlining) "*MfS1 Figures 6.18 and 7.1 provide information on the width requirements of different types of vehicle, and these can be taken as a guide to minimum lane widths. These can be applied to links between and at junctions*."

7.2.4 The existing highway layout drawings in Appendix M include a 'chainage number' reference which is provided to identify specific locations measured in metres along Stone Wood Lane/Shepley Road. Chainage zero (Ch 00.00) commences at the Shepley end of Stone Wood Lane, just to the east of the Jenkyn Lane junction. These chainages have been coloured as follows to allow identification of the existing highway widths:

- Chainage shown in 'PINK' where the existing carriageway/passing place width is LESS than 4.1m;
- Chainage shown in 'ORANGE' where the existing carriageway/passing place width is EQUAL to or GREATER than 4.1m & LESS than 4.8m; and
- Chainage shown in 'GREEN' where the existing carriageway/passing place width is 4.8m or GREATER.

7.2.5 There are several sections of carriageway along Stone Wood Lane where the width falls below 4.1m and where traffic must therefore operate one-way only on a priority basis between passing places. There are currently nine locations along Stone Wood Lane where passing places occur i.e. where the carriageway width is 4.1m or greater or where the carriageway width, plus an overrun area of verge, provides a width of 4.1m or greater i.e. a more informal passing place location but one that is still used. The location and layout of the existing nine passing places is shown on the drawings in Appendix M and they are identified as follows:

- Passing Place 1 (Chainage 140) – carriageway width generally 4.8m or more;
- Passing Place 2 (Chainage 182) – carriageway width generally between 4.1m and 4.8m;
- Passing Place 3 (Chainage 225) – carriageway width generally some 4.8m or more;
- Passing Place 4 (Chainage 305 to 330) – carriageway width generally a minimum of 4.8m;
- Passing Place 5 (Chainage 395) – informal passing place which utilises verge overrun areas to give a 4.1m to 4.2 width;
- Passing Place 6 (Chainage 407) – informal passing place which utilises verge overrun areas to give a 4.5m to 4.6 width;
- Passing Place 7 (Chainage 445) – informal passing place which utilises verge overrun areas to give a 4.8m width;
- Passing Place 8 (Chainage 486) – informal passing place which utilises verge overrun areas to give a 4.1m width; and
- Passing Place 9 (Chainage 648) – informal passing place which utilises verge overrun areas to give a 4.1m to 4.2m width.

7.2.6 A detailed Travelog has been prepared (and is contained in Appendix N) which describes the westbound journey along the Stone Wood Lane/Shepley Road corridor between Shepley and the Site and vice-versa i.e. the eastbound journey between the Site and Shepley. Through a series of photographs, drawings and text the Travelog shows how Stone Wood Lane/Shepley Road currently operates with respect to the sections of one-way working, the available driver inter-visibility and the location/geometry of the passing places. The details can be read in Appendix N but in summary there are just two locations where there is insufficient driver visibility between passing places and should two opposing vehicles meet it is necessary for one of them to reverse – these are as follows:

- Between Passing Place 4 (Ch.330) & Passing Place 5 (Ch.395) and Vice-Versa between PP5 & PP4, where there is a bend in the road:
  - Should a vehicle need to reverse in this section (for example between the point where the carriageway width is 4.1m at Ch.334 and the driver has travelled far enough to be able to see around the bend to an oncoming vehicle at Ch.356) then this would be over a maximum reversing distance of some 22m (for the driver closest to the nearest passing place).

- Between Ch.561 & Ch.584) and Vice-Versa, where there is a bend in the road:
  - Should a vehicle need to reverse in this section (for example between the point where the carriageway width is 4.1m at Ch.X561 and the driver has travelled far enough to be able to see around the bend to an oncoming vehicle at Ch.575) then this would be over a maximum reversing distance of some 14m (for the driver closest to the nearest passing place).

7.2.7 At paragraph 74 of the Council's SoC Appendix 1 the LPA states that when drivers meet within the single-track sections of Stone Wood Lane (my underlining) "*the vehicles can stop and reverse back to the previous passing place. However, given the highly constrained nature of the route (which is narrow, steep and lacks adequate forward visibility in various locations) and the lack of adequate passing places, these reversing movements can be lengthy (which justifies why frequent passing places are required), and well beyond what is usually considered as a maximum safe reversing distance (20m is quoted in various guidance documents, including Manual for Streets, and the Councils Highway Design Guide SPD, as the maximum recommended reversing distance when discussing the need for turning heads.*"

7.2.8 The Council suggest that reversing movements "*can be lengthy*" and "*well beyond what is usually considered as a maximum"* but this is a generic comment not backed up with any evidence or information i.e. where does this reversing take place and precisely over what length? In contrast I have identified that, based on the available inter-visibility between existing passing places, then reversing is most likely required in two locations over a distance of some 14m to 22m.

7.2.9 Within the same SoC Appendix 1 paragraph the Council suggest a maximum safe reversing distance of 20m as quoted in MfS. This distance is quoted in MfS (paragraphs 6.7.2 and 6.8.3) but this is in relation to the reversing of fire engines and service vehicles (similarly the 20m reference in the Kirklees Highway Design Guide relates to refuse vehicle reversing), not other smaller vehicles or cars which form the vast majority of traffic that is actually using Stone Wood Lane. Notwithstanding the inconsistency in the guidance quoted by the Council, the existing reversing distance of between 14m and 22m either complies with the suggested 20m figure or is only very marginally above

it by 2m. I therefore conclude that the reversing that does take place is acceptable and safe for all highway users based on the low frequency of vehicles, the low traffic speeds and the acceptable reversing distances.

7.3 Proposed Stone Wood Lane Highway Improvements (TPS Scheme)

7.3.1 During the planning process, the appellant offered a package of off-site improvement works along the Stone Wood Lane corridor which comprised highway widening in various locations to increase passing place widths/opportunities for all users as well as improving inter-visibility between opposing drivers. These highway improvement works were included in the TPS TA Addendum report (CD 1.33) and for convenience the drawings are also provided in Appendix O of this report. These improvements will be referred to as the 'TPS Scheme' or the 'TPS Highway Improvements' in my proof.

7.3.2 The Travelog in Appendix N describes how the proposed TPS Scheme will improve the existing Stone Wood Lane corridor and compares this to the existing situation.

7.3.3 The details can be read in Appendix N but in summary, over the full length of the Stone Wood Lane/Shepley Road corridor there are nine improved passing places proposed. The proposed improvements are materially beneficial because they increase the length of the passing place to accommodate additional vehicles, provide greater room for pedestrians/cyclists to shelter, improve inter-visibility between passing places and reduce the separation distances between them.

Council Response to Proposed TPS Stone Wood Lane Highway Improvement Works

7.3.4 Following a review of the proposed TPS passing place improvements along Stone Wood Lane the Council's Highways Development Management (HDM) officers acknowledged and accepted (within their 11/4/25 consultation response - CD 4.16) that the (my underlining) "*works would provide some improvement over the current arrangements*", however went on to conclude that "*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*".

7.3.5 In arriving at their view HDM were incorrectly of the opinion that the development will generate an additional 19 and 16 two-way vehicular trips along Stone Wood Lane during the AM and PM peak hours. However, this is not the case, and (as set out in Chapter 6 of this report) it has been demonstrated that the Site will generate far fewer trips along Stone Wood Lane, a maximum of just 5 to 7 two-way during both peak hours.

7.3.6 The HDM response also considers that the proposed passing places fall well short of the 'required provision'. However, there is no current highways guidance on what constitutes the 'required provision' of passing places on single lane roads, with both MfS and MfS2 as well as the Council's adopted Highway Design Guide, being silent on

the matter. Instead, the Council's opinion is informed by some research carried out in the 1970's by the Transport Research Laboratory (TRL) on housing estates (i.e. not rural roads) - the findings of which are set out within a 1977 Working Paper TSN29R titled 'Delays on Single-Lane Roads with Passing Places' (Ref: CD 7.6). The Council concluded from this research that passing places are required every 60m.

7.3.7 However, in their SoC Appendix 1 the Councils position on this has changed, stating in paragraph 73 that (my underling) "*the Appellant's H&T SoC document sets out their justification why passing places are not required at 60m intervals, as is recommended in the DfT guidance (TAL 2/04) that has been highlighted by the LPA. The LPA agrees that the 60m distance between passing places is not a rigid distance that must be applied in all cases, and acknowledges that when there are lower traffic flows, a greater separation distance could be acceptable, subject to the passing places being well designed and effective*".

7.3.8 In paragraph 74 the Council go on to state (my underlining) "*the Appellant's H&T SoC document goes on to state that 'what is of more importance, is achieving good inter-visibility between passing places whatever distance that may be, irrespective of setting rigid separation distances'. The LPA agree that this is one of the most important factors, as without adequate intervisibility between passing place, vehicles entering the single-track section without being able to see the exit, are unable to avoid meeting a vehicle coming in the opposite direction*". It is therefore now common ground with the Council that achieving adequate inter-visibility between passing places is of key importance, not the separation distance between them. Notwithstanding this, I now give further consideration to the TSN29R Paper, which the Council first raised in their 2024 consultation response (CD 4.14).

7.3.9 Firstly, the validity and application of the TSN29R Paper is highly questionable for the following reasons:

- The study was undertaken in 1977 and is therefore now 49 years old. Both local and national highway guidance has changed and developed significantly during this time and if there was some relevance to the findings then it is logical that they would have been developed and included within some current local/national guidance – but this is not the case;
- The brief was to determine the use of single-lane roads with passing places within *housing estates* i.e. not rural, country roads;
- The study was focussed on determining *vehicle delays* along single-lane roads i.e. its passing place separation recommendations are based on the objective of keeping the average traffic delay to 5 seconds or less. The suggested passing

place distances are therefore not recommendations on the grounds of highway safety, but on the grounds of causing negligible vehicle delay;

7.3.10 For the above reasons it is considered that very little weight can be attached to the TSN29R Working Paper which has been relied on by the Council to inform judgements on matters of highway safety.

7.3.11 Secondly, notwithstanding the negligible weight that can be attached to TSN29R, the Council's previously suggested 60m distance between passing places is incorrect for the predicted level of traffic on Stone Road Lane i.e. 76 and 83 two-way vehicles on average during the busiest morning and evening peak hours in the 2030 design year (see table 6.9).

7.3.12 The overall conclusion of the TSN29R report states:

> *"Single-lane roads with passing places spaced at between 45m to 60m (centre to centre) would give satisfactory traffic operation in housing estates at two-way flows of up to 300 veh/h. The resulting average delay to traffic is unlikely to exceed 5 seconds per vehicle over 180m. A further experiment (see Appendix 3) shows that networks of single-lane roads could operate satisfactorily at similar flow levels."*

7.3.13 The TRL study is focused on determining vehicle delays along single-lane roads and the conclusion refers to average delays unlikely to exceed 5 seconds per vehicle for flows up to 300 veh/hr with these 45m to 60m gaps between passing places. From an examination of the data within the Paper it can be determined that delays of less than 5 seconds per vehicle can be achieved with a passing place every 90m on roads with two-way flows of around 100 veh/hr (with Stone Wood Lane, having even fewer; between 76 and 83 vehicle movements per hour on average). In simple terms the distance between passing places relates to delays, depending on vehicle flows and not the issues in this case.

7.3.14 The Council also reference TAL 2/04 'Rural Traffic Calming: Bird Lane, Essex' in their April 2024 consultation response (CD 7.7), which reflects the TRL research, stating that:

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

7.3.15 TAL 2/04 does not advise on passing place separation distance requirements for roads with two-way flows of circa 100 veh/hr. However, it logically follows that the reports confirmation that a 60m separation is satisfactory for flows up to 300 veh/hr means that a reduced separation distance is therefore acceptable for a 66% reduction in traffic flow to circa 100 veh/hr which is the approximate flow on Stone Wood Lane (albeit it is lower than this). Increasing the 60m distance by an equivalent 66% therefore results in a

suggested passing place separation of around 100m (where two-way traffic flows are circa 100 vehicles/hr).

7.3.16 In summary, if the objective is to seek traffic delays of 5 seconds or less then, then the TRL and TAL guidance suggest a passing place separation distance of 90m to 100m where two-way traffic flows are 100 veh/hr – noting that predicted 2030 Design flows on Stone Wood Lane are even less than this at 76 to 83 veh/hr. The TRL Paper refers to previous studies of single lane roads within the Scottish Highlands and from a website review Argyle & Bute Council and Aberdeenshire Council highway standards recommend that passing places are provided every 100m to 150m respectively. It is concluded that if the objective is to minimise traffic delay then ideally passing places should be provided at about 100m apart where two-way traffic flows are 100 vehicles per hour.

7.3.17 However, this case is not really about capacity or the delay of traffic on Stone Wood Lane/Shepley Road, as confirmed by the LHA in paragraph 72 of their SoC Appendix 1 where they state (my underlining) "*the Appellant's H&T SoC document also discusses the effect of vehicle delay relating the adequacy (or otherwise) of the improved passing places. The LPA can confirm that it is not the delay to vehicular traffic that gave rise to the reason for refusal in this case*."

7.3.18 What is of importance, as also agreed with the Council, is achieving good inter-visibility between passing places whatever distance that may be, irrespective of setting rigid separation distances.

Assessment of Stone Wood Lane and Proposed TPS Highway Improvement Works

7.3.19 With the proposed TPS highway improvements in place the development impact on the Stone Wood Lane corridor can be safely and satisfactorily accommodated for the following key reasons:

- Existing 2025 two-way traffic flow of 65 to 74 veh/hr and predicted future 2030 traffic flows of 76 to 83 veh/hr are low and based on national MfS guidance (as well as the opinion of the Kirklees Council Highway officer when responding to the Cross Lane, Stocksmoor planning application), Stone Wood Lane is clearly a 'lightly trafficked' highway (even if the Council's 'maximum' flows of 94 to 97 veh/hr, which I do not agree with, are considered).
- Traffic speeds on Stone Wood Lane are low with average values of 19.1 to 28.4mph and 85th percentile speeds of 22.1 to 33.3mph. And these speeds will vary along different sections of the lane i.e. this was at the survey location – not at every bend and narrower section.

- The proposed development will generate a maximum of 5 to 7 two-way vehicular movements along Stone Wood Lane during the busiest morning and evening peak hour periods. An additional 5 to 7 two-way vehicular trips along Stone Wood Lane, which equates to one additional vehicle every 8½ to 12 minutes during the busiest peak hours, represents a 'non-material' impact when considering two separate methodologies - the 30 two-way trip threshold and the comparison with existing daily fluctuations in traffic flows. Notwithstanding this, materiality assessments are of course just a method of ascertaining whether or not an analysis of a particular highway network is required, not to determine if a problem exists;
- The busiest of multiple separate survey days (including both the Optima Sep/Oct 2025 and the TPS June 2025 surveys) shows that a maximum of 34 pedestrian and 18 cycle two-way movements were observed utilising the Shepley Road/Stone Wood Lane corridor over the 12-hour period between 07:00 and 19:00. On average this equates to just under 3 pedestrian and 1.5 cycle movements per hour giving a total of 4.5 two-way non-motorised users per hour i.e. existing pedestrian and cycle trips are both low;
- No personal injury accidents have been recorded over the most recently available 15-year period along the entire circa 1.2km length of the Shepley Road/Stone Wood Lane corridor. There is therefore no specific evidential cause for concern relating to existing highway safety and personal injury to pedestrians, cyclists, horse riders or drivers;
- It is recognised that the route presents several physical/geometrical constraints. However, Stone Wood Lane is a typical quiet rural lane commonly found throughout the UK and as a driver, the overall nature, multi-modal use and geometry of the route combine to enhance awareness/caution, reduce vehicle speeds and any potential collision risk. On occasions where two opposing cars meet, drivers proceed carefully, pull over and use the existing informal passing places. Occasionally they will have to back up, but that is not unusual or unacceptable for the distances involved, it happens now and does so safely. Furthermore, the proposed highway works will improve the existing situation and Stone Wood Lane will become safer as a result;
- As advised in MfS national guidance, lanes in rural areas can provide other functions than just movement, including various leisure activities such as walking, cycling (indeed Stone Wood Lane is already designated as a part of Route 627 on the National Cycle Network) and horse riding. This concept is also accepted in TAL 3/04 which states that quiet lanes are "*minor rural roads which*

are appropriate for shared use by walkers, cyclists, horse riders and motorised users. They should have low traffic flows travelling at low speeds." Such is the case for Stone Wood Lane and therefore as a pedestrian, it is not intimidating when a vehicle does appear due to the relatively slow traffic speed, available visibility, opportunity to shelter within verges/carriageway edges and driver caution/awareness (which residents of the development will also have);

- Paragraph 7.2.14 of Manual for Streets (CD 7.3) advises that routes with around, or less than 100 vehicles per hour, are much more likely to operate satisfactorily as a shared space i.e. a street which pedestrians, cyclists and vehicles share the space, and where the non-vehicle users can do so without feeling intimidated by motor traffic. This matter is something that the Council also acknowledge and recognise. The predicted future peak hour design flows of 74 to 83 two-way vehicle movements are comfortably below the guideline figure of around or less than 100 veh/hr stated in MfS;
- The proposed highway works to widen usable carriageways and extend the length of passing places will provide a material benefit to all users of Stone Wood Lane i.e. pedestrians, cyclists, horse riders and drivers. These 'benefits' will occur because the improvements will:
  - increase the width/length of some passing places so that additional vehicles can be accommodated. Furthermore, drivers will feel more comfortable pulling closer to highway boundaries where additional carriageway surfacing provided. The effective usable width is therefore increased.
  - provide more space for pedestrians/cyclists to shelter.
  - reduce inter-visibility distances to the next available passing places either side.
  - reduce actual distances for all users to the next available passing place;
- The proposed improvements and resulting benefits will clearly satisfactorily mitigate the impact of the development proposals which will only generate an additional 5 to 7 two-way vehicle movements during the busiest peak hours. The Council themselves concede that the proposed works "*would provide some improvement over the current arrangement*", albeit not sufficient in their view to accommodate an extra 19 two way vehicle movements from the appeal site (as advised in the 11/4/25 consultation and Delegated Report). This begs the question, if the Council accept the benefit and mitigation of some level of improvement along Stone Wood Lane, what level of development would they accept?

- The proposed highway improvements will not only mitigate the low impact of the proposed development along Stone Wood Lane but will also provide betterment to the route for all existing users i.e. pedestrians, cyclists, horse riders and drivers, without creating a route that would cause more of a draw for other traffic;
- Over the full length of the Stone Wood Lane/Shepley Road corridor there are nine improved passing places proposed. The proposed improvements are materially beneficial because they increase the length of the passing place to accommodate additional vehicles, provide greater room for pedestrians/cyclists to shelter, improve inter-visibility between passing places and reduce the separation distances between them;
- It is acknowledged that no highway improvements can be provided through the woods (circa Ch 562 to 696.00) because of the existing steep banking along this section and the likely damage to well established large tree roots. Notwithstanding this there is generally a good sightline along this relatively short 134m section and an informal passing place is provided at Ch.648 (Passing Place 9);
- Furthermore, the proposed highway improvements need to be considered as an overall package and the numerous benefits they bring to many other locations along Stone Wood Lane; and
- For the 683m length of Stone Wood Lane, which has sections of single-way vehicle operation (between Ch.14 and Ch.697), there are 10 locations where existing or improved passing places are provided. On average this equates to a passing place every 62m (683/11) which far exceeds the TRL and TAL guidance which suggests a passing place separation distance of 90m to 100m where two-way traffic flows are 100 veh/hr (noting that predicted 2030 Design flows on Stone Wood Lane are even less than this at 76 to 83 veh/hr). The Stone Wood Lane/Shepley Road corridor will therefore operate within capacity and with acceptable delay.

7.3.20 In summary, for all the above reasons, I conclude that the proposed Stone Wood Lane TPS highway improvements will not only mitigate the low impact of the development proposals but will also provide an operational betterment to the amenity of existing users of the route including pedestrians, cyclists, horse riders and drivers. The improved Stone Wood Lane/Shepley Road corridor has sufficient capacity to accommodate the proposed development traffic and, as agreed with the LHA, there are no concerns regarding vehicle journey time delays.

7.3.21 It has therefore been demonstrated that the proposed development passes the NPPF test (para 116) and it **will not have an unacceptable impact on highway safety**. To the contrary, it will deliver highway improvement benefits and become safer, and as such it also complies with the Kirklees Local Plan policies LP21(a, b, e), LP23 and LP24(dii) which require the safe/efficient flow of traffic on the local highway network, the provision of improvements to deliver this and the promotion of walking/cycling.

7.4 Stone Wood Lane Highway Improvements (Optima Scheme)

7.4.1 As I have explained in the previous section, the TPS highway improvements on Stone Wood Lane offered during the course of the planning application process are considered sufficient to mitigate the development proposals. However, now that the application has been refused I have undertaken a further review of the highway improvements that can be achieved along Stone Wood Lane within the adopted highway boundary and these are shown on the drawings in Appendix P. These improvements will be referred to as the 'Optima Scheme' or the 'Optima Highway Improvements' in my proof.

7.4.2 The TPS improvements would always have been secured by a form of planning (Grampian) condition, are not part of the scheme as such (as they are in the highway and permission is not needed for them as part of this appeal as they will be delivered via a S278 Highways agreement in due course). However, if the inspector is minded to grant permission and feels that a more general condition requiring highway improvements to be submitted and approved should be applied, as opposed to a condition referring to the existing TPS plans, then the Optima Scheme illustrates what such a condition could deliver.

7.4.3 The Travelog in Appendix N describes how the Optima Scheme will improve the existing Stone Wood Lane corridor and compares this to the existing situation as well as the TPS Scheme. The details can be read in Appendix N but in summary the key differences to the TPS Scheme are as follows:

- Provision of a new Passing Place 5 (Ch.365 to Ch.387) which creates inter-visibility with Passing Place 4 thereby removing the need for any vehicle reversing in this location and improving non-motorised user amenity;
- Provision of a new Passing Place 6 (Ch.412 to Ch.433) which creates a longer waiting area capable of accommodating two vehicles and a greater number of pedestrians, cyclists or horse riders; and
- Provision of signage either end of the Stone Wood Lane/Shepley Road corridor to advise drivers that there is no footway along the route and to anticipate the presence of pedestrians in the carriageway. This is a matter that can be independently conditioned in any event.

7.4.4 At other passing place locations the Optima Scheme improvements are very similar to the proposed TPS Scheme and whilst there are some relatively small geometry differences (predominantly to remove some carriageway overprovision to retain verge areas and secure optimum inter-visibility between passing places), the overall benefits to the improved operation of the existing highway network are unchanged.

7.4.5 For all the same reasons provided in the previous section (for the TPS Scheme), I conclude that the proposed Stone Wood Lane Optima highway improvements will not only mitigate the low impact of the development proposals but will also provide an operational betterment to the amenity of existing users of the route including pedestrians, cyclists, horse riders and drivers. The provision of two new passing place locations mean that this operational betterment is even greater than the TPS Scheme due to the provision of improved inter-visibility and additional passing place width/length.

8 Summary and Conclusions

8.1 Introduction

8.1.1 This chapter acts as a summary to my PoE and concludes the highways and transportation matters.

8.2 Background

8.2.1 I have been appointed by Newett Homes to assist in their appeal against the refusal of a full planning application (Ref: 2024/62/91242/E) for a proposed residential development of 50 dwellings located on land to the north-east of Shepley Road, Stocksmoor.

8.2.2 To support the planning application, which was validated by Kirklees Council on the 10th May 2024, a Transport Assessment (TA) and a Travel Plan (TP), both dated 25th April 2024, were prepared by Andrew Moseley Associates (AMA).

8.2.3 Acting as the Local Highway Authority (LHA), the Highways Development Management team (HDM) within Kirklees Council (KC) undertook a review of the 2024 AMA Transport Assessment and Travel Plan reports and provided comments in their consultation response dated 14th October 2024. Newett Homes then appointed TPS Transport Consultants Ltd (TPS) to address the Councils October 2024 consultation comments, which following further discussions/meetings with KC culminated in the production of a Transport Assessment Addendum (TAA) report dated 4th April 2025.

8.2.4 Following a review of the TAA, Kirklees Council HDM produced a second consultation response dated 11th April 2025. Acting as the Local Planning Authority (LPA), Kirklees Council planning officers accepted LHA officer advice and recommended refusal of planning permission for the following two reasons:

> *"1. The detrimental impact of development traffic on the local highway network, namely Stone Wood Lane, would adversely impact the safe and efficient movement of traffic by all modes, and be particularly detrimental to active travel users. Mitigation measures have been proposed to Stone Wood Lane which are considered to be insufficient to mitigate the harm of additional vehicle movements generated by the proposal. The proposal would therefore result in unacceptable impacts on highway safety and the amenity of active travel users utilising the route, contrary to Kirklees Local Plan Policy LP21(a, b, e), LP23, and LP24(dii) and paragraph 116 of the National Planning Policy Framework."*

> *"2. There is insufficient information supporting the application relating to requirements to support local infrastructure, to off-set the impacts of additional housing provision. A Section 106 agreement is required to ensure contributions towards the provision of affordable housing,*

education, on and off-site public open space, and the ongoing management and maintenance of on-site facilities including the public open space, drainage infrastructure (until adoption), and on-site significant ecological habitats. In the absence of an agreed Section 106 agreement, the proposed development therefore fails to achieve the requirements of policies LP4, LP11, LP28, LP30(i), LP49, and LP63 of the Kirklees Local Plan."

8.2.5 Following the refusal of planning permission Newett Homes appointed myself to address Reason for Refusal 1 (RfR1).

8.3 The Site and Existing Highway Network

The Site

8.3.1 The development Site is located to the north-east of Shepley Road on the eastern edge of the village of Stocksmoor, which lies some 7km to the south-east of Huddersfield town centre.

8.3.2 The Site is designated as Safeguarded Land within the 2019 Kirklees Local Plan (Ref: SLS30), which means that the Council has identified that the Site is suitable to accommodate development in the longer term.

Local Highway Network

8.3.3 Shepley Road is a rural, residential street which forms the southern boundary of the Site and provides access to it. Many of the roads in the local area are historic rural routes and users of them will be familiar with their nature and non-standard layout.

8.3.4 Shepley Road extends southwards from the Site for some 250m where it turns ninety degrees eastwards to enter some woods and becomes known as Stone Wood Lane. Stone Wood Lane then continues for another circa 800m before arriving at the junction with Jenkyn Lane on the outskirts of Shepley where it becomes known as Jos Lane. It is over this 800m length of Stone Wood Lane that the Council has raised concerns, which has culminated in RfR1.

8.3.5 The average weekday, two-way traffic flows along the Shepley Road/Stone Wood Lane corridor to the east of the Site are 65 and 74 vehicles during the morning 08:00 to 09:00 and evening 17:00 to 18:00 peak hours respectively and 618 vehicles daily.

8.3.6 It is recognised that the route (particularly the Stone Wood Lane section) presents several physical/geometrical constraints including a reduced carriageway width (single track in many areas), reduced forward visibility, fairly steep gradient in places (particularly through the woods), substandard passing places and a lack of segregated pedestrian provision.

8.3.7 That said, Stone Wood Lane is a typical quiet, shared surface, rural lane commonly found throughout the UK including many places elsewhere in Kirklees. Such rural roads

often do not conform to present day guidance on highway standards and require a non-standard approach.

8.3.8 The Shepley Road/Stone Wood Lane corridor forms a small section of the 38km National Cycle Network (NCN) Route 627 which runs between Kirkburton to the north of the Site and Millhouse Green (via Shepley) to the south. Two Public Right of Way (PRoW) footpaths connect with the Shepley Road/Stone Wood Lane corridor. Whilst not shown on the Council's Definitive Map there are also additional established footpaths.

8.3.9 On-site observations confirm the rural, low frequency use of Stone Wood Lane and as a pedestrian, I observed that it is not intimidating when a vehicle does appear due to the relatively slow traffic speed, available visibility, opportunity to shelter within verges/carriageway edges and driver caution/awareness (which residents of the development will also have).

8.3.10 As a driver, the overall nature, multi-modal use and geometry of Stone Wood Lane combine to enhance awareness/caution, reduce vehicle speeds and any potential collision risk. This is borne out by the historic accident data obtained from the Council which confirms that **not one personal injury accident** had been recorded along the Shepley Road/Stone Wood Lane corridor over a 15-year period, when 3 to 5 years is the normal timeframe for assessment and personal injury accident records are the recognised empirical method for assessing accidents.

Surveys

8.3.11 Surveys have been undertaken within Stocksmoor to determine a bespoke traffic distribution and trip generation for residents of the existing village. This is the preferred approach to assessing traffic generated by the proposed development because it is based on empirical evidence that takes into account the Site's location within Stocksmoor, the location/availability of local facilities and the accessibility to public transport.

8.3.12 Surveys have also been completed to record vehicular and non-motorised movements along the Stone Wood Lane/Shepley Road corridor.

8.4 Development Proposals

8.4.1 The submitted planning application is for a residential development of 50 dwellings with associated access, parking, public open space, landscaping and infrastructure.

Proposed Shepley Road/Site Access Arrangements

8.4.2 Access to/from the Site for all transport modes is proposed from a new simple priority 'T' junction on Shepley Road.

8.4.3 As confirmed in the delegated planning report the principle of the site access arrangements is considered by the Council to be appropriate and whilst they have not been subject to an agreed Stage 1 Road Safety process, the LHA are satisfied that a suitable access arrangement is achievable, and any additional changes (and the required Stage 1 Road Safety Audit, which may identify these) can be controlled via a suitably worded condition. This is a very normal approach in my experience.

Construction Access

8.4.4 Construction access to the Site would be from Shepley Road with all HGV movements prohibited from utilising Stone Wood Lane to the east.

8.5 Site Accessibility and Sustainability

Accessibility by Foot and Cycle

8.5.1 The footways on Shepley Road and Station Road provide routes for residents of the Site to walk to the facilities in Stocksmoor within a 5 to 7 minute walk.

8.5.2 There is also a network of footpaths and Public Rights of Way within the local area that provide accessible leisure, fitness and dog walking opportunities.

8.5.3 The Site lies adjacent to the Shepley Road/Stone Wood Lane corridor, which forms part of the National Cycle Network (NCN) Route 627.

Accessibility by Rail

8.5.4 Stocksmoor railway station lies adjacent to the northern boundary of the Site and can be reached within a short 6-minute walk from a central point within the proposed development. The station has a 6 space car park, ticket machines, a seated area, CCTV and 3 lockers provided as cycle parking within the car park.

8.5.5 The station lies on the Penistone Line which operates between Huddersfield and Sheffield, calling at a number of stations including Barnsley and Meadowhall.

Accessibility by Bus

8.5.6 The nearest bus stop to the proposed development is located on Cross Lane, a 250m distance to the west of the Site, which can be reached within a short 3-minute walk from a central point within the development Site. The stop is served by service 341, which is operated by South Pennine Community Transport on a loop between Stocksmoor and Huddersfield.

8.5.7 In addition to bus service 341, there are two school bus services that run to/from Stocksmoor, one to Kirkburton Middle School and the other to Shelley College.

Accessibility to Local Facilities

8.5.8 The facilities within Stocksmoor i.e. the pub, village hall, railway station and bus stops are within comfortable walking/cycling distance of the development Site.

8.5.9 It is recognised and accepted that some residents of the development Site will access the facilities within Shepley by car, such as the primary school, co-op food store and health centre. However, these trips will be minimal and have been fully accounted for in my bespoke assessment of development traffic generations along Stone Wood Lane. Furthermore, alternative facilities to those in Shepley are located elsewhere within the local area which do not require the use of Stone Wood Lane.

8.5.10 There are of course many other key trip attractors that are not located in Shepley which generate trips by Stocksmoor residents (some on a regular daily/weekly basis) that do not therefore require the use of Stone Wood Lane.

Site Accessibility Summary

8.5.11 The close proximity of both the railway station and the bus service will provide residents of the Site with convenient, walkable access to regular public transport services, which operate throughout the day and enable travel to key regional destinations that offer extensive facilities, services, shops, leisure activities and employment opportunities. Stocksmoor itself provides some walkable local facilities (pub and village hall) and additional services/shops can be reached by cycle in nearby villages, other than Shepley.

8.5.12 As such the Site is in a sufficiently sustainable location for the development proposed, and as Mr Johnson explains, this was also determined by the Local Plan process, which looked at a range of sites and factors, and allocated land for housing in Stocksmoor now and for future development. It follows the Site's location is compliant with the NPPF which requires at paragraph 110 that people are offered "*a genuine choice of transport modes".* Noting also the last sentence of paragraph 110 which states that "*opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making*."

8.5.13 Within the current working draft of the Statement of Common Ground (SoCG) it is also agreed with the Council that the Site is in a "*sustainable and accessible location*", "*is accessible by public transport*" and "*the sustainability of the site's location is not a basis for refusal*".

8.6 Traffic Flows

Existing Traffic Survey Flows

8.6.1 Traffic surveys of the Shepley Road/Stone Wood Lane corridor have been undertaken in September 2025 and the resulting average weekday peak hour flows (two-way) are as follows:

- 65 vehicles during the morning peak hour 08:00 to 09:00; and
- 74 vehicles during the evening peak hour 17:00 to 18:00.

Base Traffic Flows

8.6.2 The 2030 Base Traffic Flows along the Stone Wood Lane corridor are provided in the table below.

Time Period	2030 Base Flows Two-Way Vehicle Movements
AM Peak Hour (08:00 to 09:00)	69
PM Peak Hour (17:00 to 18:00)	78

Proposed Development Vehicular Trip Generation

8.6.3 Two methodologies have been applied to determine the predicted volume of traffic generated by the proposed development, one utilising a bespoke survey of existing properties within Stocksmoor and a second utilising the national TRICS database. Both are equally valid and produce very similar results i.e. development peak hour trip generations of between 28 and 30 two-way vehicles.

8.6.4 Due to the empirical and bespoke nature of the methodology, my PoE is based on a **development traffic generation of 30 two-way vehicle movements in the peak hours**, determined from the Stocksmoor village surveys.

8.6.5 This figure is just 2 vehicle movements less than the 32 two-way peak hour development trips now predicted to be generated by the Council within their SoC (Appendix 1).

Proposed Development Traffic Distribution

8.6.6 Two methodologies have been applied to determine the predicted distribution and number of development trips along Stone Wood Lane, one utilising a bespoke survey of existing properties within Stocksmoor and a second based on calculating trip generations by journey purpose.

8.6.7 Both are equally valid and comply with the NPPF policy test (para 116 and glossary definitions) to consider reasonable and realistic future scenarios. The distribution assessments produce very similar results giving a range of between **15.3% and 23.8% of development traffic travelling along Stone Wood Lane**, which equates to between **5 and 7 two-way vehicle movements** during the busiest peak hour periods.

8.6.8 It is worth noting that there are alternative, less direct routes to Shepley (via Stone Wood Lane) that Stocksmoor drivers can take if preferred.

Design Traffic Flows

8.6.9 Adding the 2030 base traffic flows to the proposed development trips obtained from the empirical bespoke surveys produces the **2030 Design traffic flows of 74 to 76 and 83 vehicles along the Stone Wood Lane corridor during the busiest morning and evening peak hours**.

8.6.10 Manual for Streets advises that routes with around, or less than 100 vehicles per hour, are much more likely to operate satisfactorily as a shared space i.e. a street which pedestrians, cyclists and vehicles share the space, and where the non-vehicle users can do so without feeling intimidated by motor traffic. The predicted future peak hour design flows of 74 to 83 two-way vehicle movements are comfortably below the guideline 100 veh/hr figure stated in MfS.

8.6.11 The Council's SoC Appendix 1 (para 62) states that the LPA have produced their own 2030 Design Traffic flows, which include current maximum values. I disagree that maximum traffic flows should be used in the assessment of the Shepley Road/Stone Wood Lane corridor but even if they are the 2030 peak hour values remain below 100 veh/hr and the outcome of my assessments, findings and conclusions with respect to the Stone Wood Lane/Shepley Road corridor is unaffected.

Material Impact

8.6.12 Three materiality assessment methodologies have been considered, the 30 two-way trip threshold, comparison with existing daily fluctuations in traffic flows and the 5% to 10% increase in traffic threshold. The first two methodologies conclude that a development traffic increase of 5 to 7 vehicles per hour along the Stone Wood Lane/Shepley Road corridor does not represent a material impact. The third methodology put forward by the Council in their SoC, which I do not agree with, suggests that there may be a material impact if Stone Wood Lane is defined as a sensitive location.

8.6.13 Notwithstanding this, materiality assessments are of course just a gateway to ascertaining whether or not an analysis of a particular highway network is required at all, and if it is, whether or not the development impact justifies any mitigation measures. Despite concluding from the two materiality assessments that I have

undertaken that the development will not have a material impact at all, I have still proceeded to undertake a detailed assessment of the Stone Wood Lane/Shepley Road corridor and proposed suitable and satisfactory highway mitigation measures. In other words, even on the Council's approach the furthest the matter takes us is that assessment is needed, and as assessment has been undertaken, that point goes no further.

8.7 Assessment of Stone Wood Lane/Shepley Road Corridor

Existing Stone Wood Lane/Shepley Road Highway Layout & Operation

8.7.1 The Stone Wood Lane/Shepley Road corridor extends for some 1.07km between the junction of Jenkyn Lane (on the western edge of Shepley) and the Site.

8.7.2 A detailed Travelog has been prepared which describes the westbound journey along the Stone Wood Lane/Shepley Road corridor between Shepley and the Site and vice-versa i.e. the eastbound journey between the Site and Shepley. Through a series of photographs, drawings and text the Travelog shows how Stone Wood Lane/Shepley Road currently operates with respect to the sections of one-way working, the available driver inter-visibility and the location/geometry of the passing places. There are just two locations where there is insufficient driver visibility between passing places and should two opposing vehicles meet it is necessary for one of them to reverse.

Proposed Stone Wood Lane Highway Improvements (TPS Scheme)

8.7.3 During the planning process, the appellant offered a package of off-site improvement works in the highway along the Stone Wood Lane corridor which comprised highway widening in various locations to increase passing place widths/opportunities for all users as well as improving inter-visibility between opposing drivers. These highway improvement works were included in the TPS TA Addendum report (CD 1.33) and are referred to as the 'TPS Scheme' or the 'TPS Highway Improvements'.

8.7.4 The Travelog describes how the proposed TPS Scheme will improve the existing Stone Wood Lane corridor and compares this to the existing situation. In summary, over the full length of the Stone Wood Lane/Shepley Road corridor there are nine improved passing places proposed. The proposed improvements are materially beneficial because they increase the length of the passing place to accommodate additional vehicles, provide greater room for pedestrians/cyclists to shelter, improve inter-visibility between passing places and reduce the separation distances between them.

8.7.5 Following a review of the proposed TPS passing place improvements along Stone Wood Lane the Council's Highways Development Management (HDM) officers acknowledged and accepted (within their 11/4/25 consultation response) that the (my underlining)

"*works would provide some improvement over the current arrangements*", however went on to conclude that "*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*".

8.7.6 Upon detailed assessment I conclude that the proposed Stone Wood Lane TPS highway improvements will not only mitigate the low impact of the development proposals but will also provide an operational betterment to the amenity of existing users of the route including pedestrians, cyclists, horse riders and drivers. The improved Stone Wood Lane/Shepley Road corridor has sufficient capacity to accommodate the proposed development traffic and, as agreed with the LHA, there are no concerns regarding vehicle journey time delays.

8.7.7 It has therefore been demonstrated that the proposed development passes the NPPF test (para 116) and it **will not have an unacceptable impact on highway safety**. To the contrary, it will deliver highway improvement benefits and become safer, and as such it also complies with the Kirklees Local Plan policies LP21(a, b, e), LP23 and LP24(dii) which require the safe/efficient flow of traffic on the local highway network, the provision of improvements to deliver this and the promotion of walking/cycling.

Stone Wood Lane Highway Improvements (Optima Scheme)

8.7.8 I consider that the TPS highway improvements on Stone Wood Lane offered during the course of the planning application process are sufficient to mitigate the development proposals. However, now that the application has been refused I have undertaken a further review of the highway improvements that can be achieved along Stone Wood Lane within the adopted highway. These improvements are referred to as the 'Optima Scheme' or the 'Optima Highway Improvements'. The relevance of this Scheme is discussed at 7.4.2 above.

8.7.9 The Travelog describes how the Optima Scheme would further improve the existing Stone Wood Lane corridor and compares this to the existing situation as well as the TPS Scheme. In summary the key changes to the TPS Scheme are as follows:

- Provision of a new Passing Place 5 (Ch.365 to Ch.387) which creates inter-visibility with Passing Place 4 thereby removing the need for any vehicle reversing in this location and improving non-motorised user amenity;
- Provision of a new Passing Place 6 (Ch.412 to Ch.433) which creates a longer waiting area capable of accommodating two vehicles and a greater number of pedestrians, cyclists or horse riders; and

- Provision of signage either end of the Stone Wood Lane/Shepley Road corridor to advise drivers that there is no footway along the route and to anticipate the presence of pedestrians in the carriageway (which can be separately conditioned ion any event).

8.7.10 At other passing place locations the Optima Scheme improvements are very similar to the proposed TPS Scheme and whilst there are some relatively small geometry differences, the overall benefits to the improved operation of the existing highway network are unchanged.

8.7.11 For all the same reasons provided for the TPS Scheme, I conclude that the proposed Stone Wood Lane Optima highway improvements will not only mitigate the low impact of the development proposals but will also provide an operational betterment to the amenity of existing users of the route including pedestrians, cyclists, horse riders and drivers. The provision of two new passing place locations mean that this operational betterment is even greater than the TPS Scheme due to the provision of greater inter-visibility and additional passing place width/length.

8.8 Overall Summary and Conclusion

8.8.1 I conclude that the proposed development fully accords with the NPPF and local transport policies and there is no reason on highway, transport or accessibility grounds why the Appeal Site should not be granted planning permission.