Kirklees Council

Proof of Evidence of Adam Darwin FIHE

Appeal reference: APP/Z4718/W/25/3375000

Application reference: 2024/91242

Site: Land north east of, Shepley Road, Stocksmoor, Huddersfield, HD4 6XW

Description of development: Erection of residential development (50 dwellings) with associated access, parking, public open space, landscaping and infrastructure

Appellant: Newett Homes

Date: 27/01/26

Contents

1	Qualifications and Experience	03
2	Introduction	04
3	Background and Base Data	07
4	Existing Constraints and Safety / Operational Issues	28
5	Other Key Issues	52
6	Summary and Conclusions	85

Appendices

Appendix A - ATC Data Summary - Shepley Road and Stone Wood Lane

Appendix B - Department for Transport (DfT) – Connectivity Tool Lite Output

Appendix C - Trip Rate Extract (Table 3.1) from Storthes Hall TAA (application reference 2023/93667)

Appendix D - Planning Area 22: Shelley – PAA School Data (See Table C)

Appendix E - Hourly summary of Appellant's Pedestrian / Cycle / Equine Survey data

Appendix F - Plan 1 & Plan 2 - Showing visibility issues

Appendix G - Google maps journey time / distance illustration

Appendix H - Existing Informal Passing Places and Proposed Improvement Locations

1. Qualifications and Experience

1.1 My name is Adam Darwin. I am Group Engineer, who has been co-managing the Highway Development Management (HDM) Team at Kirklees Council for the last 4 years. I was formerly a Principal Engineer at Sanderson Associates (Consulting Engineers) Ltd, and have over 25 years experience in the field of Highways Engineering, Traffic and Transportation Planning and Road Safety Auditing, with my experience gained in both the private and public sector, on a wide range of development and infrastructure projects across the UK. I hold a HNC in Civil Engineering (obtained from Sheffield Hallam University in 1998) and have been a Fellow Member of the Institute of Highway Engineers (IHE) since 2012.

1.2 I was the case officer in the HDM Team responsible for providing the consultation responses relating to the planning application (including at the pre-application stage) that is subject to this appeal.

1.3 My evidence relates to highway, traffic and transportation matters, and specifically Reason for Refusal 1.

1.4 In providing my consultation responses and this evidence, I have visited the site and surrounding area on numerous occasions, including walking and driving along Stone Wood Lane, during both peak and off-peak traffic periods, and attended two site visits with the Appellant's representatives during the course of the planning application process. I have also had regard to various sources of evidence, including local representations that have highlighted issues relating to the existing highway network and it's operation.

1.5 The evidence that I have prepared and provide for this appeal reference APP/Z4718/W/25/3375000 in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

2. Introduction

2.1 This Proof of Evidence (PoE) has been prepared on behalf of the Local Planning Authority (LPA), Kirklees Council (KC) in respect of an appeal against the refusal of residential development (LPA Ref: 2024/62/91242/E) on land north east of Shepley Road, Stocksmoor, Huddersfield, HD4 6XW.

2.2 The Appellant submitted a detailed Planning Application on 10th May 2024 for the following description of development:

'Erection of Residential development (50 dwellings) with associated access, parking, public open space, landscaping and infrastructure.'

2.3 The Application was determined by delegated decision on 24th April 2025. The Decision Notice contained two reasons for refusal, as follows:

'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 Stoney 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.'

2.4 My evidence relates to highways, traffic and transportation matters, and specifically Reason for Refusal 1 (RfR1). Matters relating to RfR 2 are being dealt with by others.

2.5 The main Kirklees Local Plan (adopted February 2019) policies relating to RfR 1 are Policy LP21 and Policy LP24 (dii), which are consistent with National Planning Policy Framework (NPPF December 2024) policies 115-118 relating to considering development proposals and promoting sustainable development.

2.6 As confirmed in the LPA's Statement of Case (LPA SoC), the Council's RfR 1 also refers to Local Plan Policy LP23, which relates to the core walking and cycling network as shown on the Local Plan Policies Map. However, although Stone Wood Lane is part of the National Cycle Network and the Trans Pennine Trail, it is not currently part of the core walking and cycling network identified on the Local Plan Policies Map. Therefore, Local Plan Policy LP23 is not considered to be of specific relevance to this appeal.

2.7 Without prejudice to the LPA's conclusions that the proposed development would be unacceptable, the LPA are to provide suggested conditions for consideration, in the event that the Inspector were to allow the appeal. This is currently being formulated, and is anticipated to form part of the Statement of Common Ground (SoCG) between the LPA and the appellant, which will identify any areas of disagreement between the parties identified therein. An initial version of the SoCG was submitted to the Planning Inspectorate on 7th January 2026, in accordance with the required timescales. However, the SoCG is not yet in its final form and will continue to be developed in advance of the Inquiry. As such, based on the latest version of the SoCG, it is agreed that the following matters remain in dispute relating to RfR 1, which can be narrowed down to:

- The existing conditions on Stone Wood Lane, and the section of Shepley Road between the site access and Stone Wood Lane, with reference to highway safety and operation;
- The relevant base traffic / speed data and how this is used in the assessment;
- The number of development trips generated by the proposal;
- The distribution of development trips on the local highway network;
- The sufficiency of off-site highway improvements on Stone Wood Lane; and

- The level of impact on highway safety, and on the amenity of active travel users, arising as a result of the development including mitigation measures.

2.8 The remainder of this evidence is set as follows:

- Section 3 - Sets out background matters that are required to put other matter in context, together with a review of the base traffic (all modes), speed and accident data submitted by the Appellant, including in that contained in their Statement of Case, and sets out the data that I have utilised within this evidence;
- Section 4 - Including my assessment of the existing constraints and highway safety / operational issues along Stone Wood Lane, which give rise to the concerns regarding the adverse impact of the development on this route;
- Section 5 – Responds to the matters that remain in dispute (in additional to those set out in section 4);
- Section 5 – Includes a Summary and Conclusions.

2.9 Artificial Intelligence (AI) has not been used to produce (or otherwise amend) any content contained within this evidence. However, as Microsoft Copilot is embedded in Microsoft 365 software used by Kirklees Council, it has been used to prepare this evidence, but only in so far as carrying out standard word processing type functions available prior to the introduction of Copilot (e.g. spell-checking, formatting etc). Similarly, when obtaining information online (e.g. obtaining core documents), AI been used, but only in the same manner as standard web-search functions, and not for content creation.

3. Background and Base Data

Introduction and Background

3.1 The site is located on Shepley Road to the east of Stocksmoor. Access to the site is currently via a field gate on to Shepley Road, which is a single carriageway two-way road that is subject to a 30mph speed limit along the site frontage and to the west leading to the main residential area of Stocksmoor. Immediately to the south of the site frontage, the speed limit on Shepley Road changes to National Speed Limit (NSL = 60mph in this location) and the road name changes to Stone Wood Lane further to the south, which then leads to Shepley village circa 1.05km travel distance to the east, where the speed limit then reduces back to 30mph. The exact location where this road changes name is unclear (most likely at the bottom of the hill on entry to Stone Wood). Therefore, for ease of reference, the full length of the road that is subject to the National Speed Limit is described as Stone Wood Lane in my evidence. The full length of Shepley Road and Stone Wood Lane, between the junctions with Cross Lane in Stocksmoor and Jos Lane in Shepley (a 1.2km length in total) is signed as being 'Unsuitable for HGVs', with prominent warning signage provided at either end, as can be seen on Photo 1 below.

Photo 1 – 'Unsuitable for HGVs' Signage at Shepley end of Stone Wood Lane

3.2 The development proposals were subject to a pre-application consultation with the Local Planning Authority in early 2024. This involved a pre-application meeting

with the applicant and their designers, and a formal pre-application response [CD 5.6] was provided by the LPA that included comments provided by the Councils Highway Development Management (HDM) Team. The pre-application response highlighted concerns relating to the proposed site layout and site access proposals. Concerns were also raised regarding the significant level of development traffic that was likely to be generated along Stone Wood Lane, as it is the most direct route to the local amenities available in Shepley (school, shops, medical facilities etc) and for onward journeys to the south. These concerns related to a number of physical constraints along the route, including it being single-track width for long sections, having restricted forward visibility, a lack of adequate passing places, no pedestrian provision, and being subject to the national speed limit. It was also noted that the road forms part of National Cycle Network (NCN) Route 627 (Kirkburton to Millhouse Green) and the Trans Pennine Trail. The HDM response concluded that it did not appear feasible to deliver sufficient improvement to Stone Wood Lane, which would allow the additional development traffic to be safely accommodated. This was due to highway boundary constraints, which appeared to preclude significant improvements to the existing sub-standard passing places that exist, which would likely require land beyond the existing highway boundary. The pre-application response also advised of the highway and transport related information that would be required to support a planning application, including the requirement for a Transport Assessment / Statement and Travel Plan, with the scope of the assessments to be agreed in advance with the LPA.

3.3 A planning application was then submitted on 30/04/24, which was supported by a Transport Assessment [CD 1.23] and Travel Plan [CD 1.24]. However, the scope of the Transport Assessment was not agreed in advance with the Council, contrary to the pre-application advice, and the proposals did not propose any improvements to Stone Wood Lane to mitigate the impact of development traffic. On the contrary, the Transport Assessment attempted to justify why development traffic would not use Stone Wood Lane, with a very low and unrealistic traffic distribution rate of between 3.8% - 20% of development traffic suggested to utilise this route.

3.4 The development proposals as originally submitted had taken into account some of the main concerns relating to the site layout and site access. It was confirmed in the Highway Development Management (HDM) consultation response of 14/10/24 [CD 4.14] that the principle of the site access on to Shepley Road was considered appropriate, including the realignment of the bend to improve forward visibility and to allow vehicles to safely pass. However, further changes to the site access arrangements were sought to address outstanding technical matters, together with a request for additional supporting information (including additional speed survey data, level information and swept path analysis, amongst other things). It was also confirmed that whilst the general principle of the revised site layout were now acceptable, further changes and additional supporting information were required, as the proposed streets had not been designed in full accordance with Kirklees Highway Design Guide SPD [CD 6.6] (and other relevant guidance), and so were not suitable for adoption at that time. It was also advised that subject to revised information being provided that adequately addressed the outstanding site access and site layout issues, a Stage 1 Road Safety Audit (RSA) would then be required.

3.5 The Council's Highway Development Management (HDM) consultation response of 14/10/24 [CD 4.14] also highlighted a number of deficiencies with the traffic assessment methodology including in the supporting Transport Assessment. This included concerns with the development trip generation assessment had not been undertaken in accordance with good practice guidance, including no consideration of trips by modes other than motor-vehicles, and making no attempt to take into account the site's low level of accessibility for pedestrians and cyclists. Concerns were also raised regarding the unrealistic traffic distribution assumptions that had been used in the assessment, which included an assumption that development traffic would avoid using Stone Wood Lane and utilise the longer route via Penistone Road / Abbey Road when travelling to / from Shepley. Concerns were also raised regarding the submitted Travel Plan, which did not include ambitious targets to reduce single occupancy car trips, nor agree to provide either the Residential MCard scheme (or a Residential Travel Plan Fund) that had been identified to be required at the pre-application stage, together with the Council's required Travel Plan Monitoring Fee.

3.6 The HDM consultation response also reiterated the concern regarding the development traffic impact (which had not been adequately assessed) along Stone Wood Lane, including the adverse impact on its operation, both for drivers, but more importantly for pedestrians and cyclists, who would be at increased risk of collisions with passing and reversing vehicles. On-site observations were also highlighted, with drivers observed having to reverse back for a substantial distance to reach a point where passing could occur due to the lack of adequate passing places, with this problem compounded when multiple vehicles arrive together, resulting in these vehicles having to reverse back even further until there is space for multiple vehicles to pass. The response highlighted what was deemed necessary in terms of adequate passing places for this type of single-track road. This was based on research by the Transport Research Laboratory (TRL) contained in their advice note entitled *'TSN29R (Studies of delays to traffic on single-lane carriageways with passing places)*', which has been used in various subsequent guidance documents, including the Department for Transport (DfT) document *'TAL 02/04 Rural traffic calming - Bird Lane, Essex'* (with this later document, produced in 2004, highlighted in the subsequent HDM consultation response [CD 4.16]). It was suggested by HDM that passing places that can accommodate multiple vehicles should be provided, with a maximum spacing of 60m, which are 5.5m wide to allow vehicles to safely pass, and most importantly should include adequate intervisibility between the passing places. It was concluded that a realistic assessment of the traffic impact on the local highway network had not been undertaken, including the assessment of impact on Stone Wood Lane, which is considered to be unsuitable to accommodate additional development traffic without improvement. As such, the development proposals could not be supported.

3.7 Following the HDM comments, a number of meetings and site visits took place with the Appellant's team (including their then new transport consultant), which included HDM and other planning colleagues, to discuss how the outstanding highways and transportation issues could potentially be addressed. This included discussions on the scope for mitigation measures that may be possible on Stone Wood Lane, to mitigate the impact of development traffic, and included a site visit attended by the Councils Tree Officer (who accompanied me and the Appellant's

representatives). Following these discussions, the Appellant submitted a Transport Addendum Report (TAA) report [CD 1.33], which sought to address the concerns previously raised. This included revised site access proposals and supporting information, an updated traffic assessment, and proposals for a scheme of passing place improvements on the south eastern section of Stone Wood Lane. This information was submitted on 04/04/25 and included the following:

- 24071-LE-00-ZZ-DR-D-0001-P4 - Feasibility Layout - Sheet 1 [CD 1.34]
- 24071-LE-00-ZZ-DR-D-0004-P4 - Proposed Contour Plan [CD 1.35]
- 24071-LE-00-ZZ-DR-D-0005-P3 - Proposed CL Long Sections [CD 1.36]
- 24071-LE-00-ZZ-DR-D-0006-P3 - Vehicle Tracking [CD 1.37]
- 24071-LE-00-ZZ-DR-D-0100-P2 - Stone Wood Lane - Existing Road Widths, Sheet 1 [CD 1.38]
- 24071-LE-00-ZZ-DR-D-0101-P2 - Stone Wood Lane - Existing Road Widths, Sheet 2 [CD 1.39]
- 24071-LE-00-ZZ-DR-D-0110-P3 - Stone Wood Lane - Highway Improvements, Sheet 1 [CD1.40]
- 24071-LE-00-ZZ-DR-D-0111-P3 - Stone Wood Lane - Highway Improvements, Sheet 2 [CD 1.41]
- P2835_20250404 - Transport Assessment Addendum (TAA) report [CD 1.33]

3.8 The above drawings 0100, 0101, 0110 & 0111 include a ‘chainage’ reference along the Stone Wood Lane route, with Chainage zero (Ch 0) commencing at the Shepley end, just to the east of the Jenkyn Lane junction. These chainage references have been utilised further in this evidence for the ease of locating various highway features along the route. To also assist in locating the main existing informal passing places (although not all overrun areas have been shown) and those that are proposed to be improved (as shown on the above submission plans) on the single track sections of Stone Wood Lane, these have been given a reference letter from PP - **A** (nearest Shepley end) to PP – **J** (at start of the uphill section through Stone Wood). These can be seen on Figure 1 below, with a larger scale version of the reference plan included at the start of **Appendix H** (which also includes a critique of the above passing place proposals).

Figure 1 – Passing place locations (existing informal and proposed improvements), Larger Scale Plan in Appendix H

3.9 The revised site access arrangements (24071-LE-00-ZZ-DR-D-0001-P4)[CD 1.34] included in the TAA report [CD 1.33] addressed the main outstanding issues with the site access arrangements. This including the provision of additional information (speed data, long-sections and visibility splay information), which confirmed that the site access visibility splays of 2.4x43m to the west and 2.4x38m to the south were acceptable. Therefore, HDM confirmed in the consultation response of 11/04/25 [CD 4.16] that there was no objection to the principle of the proposed site access, and that any further changes that may be required, including any changes that may arise from the required Stage 1 Road Safety Audit process, could be addressed via a suitably worded planning condition. In relation to the Travel Plan, the TAA report also confirmed that the Appellant agreed to provide the Council's Travel Plan Monitoring Fee (£10,000 = 5 years x £2,000), a

Sustainable Transport Fund (currently £832.37 per dwelling, based on the cost of a Residential MCard - Bus and Rail Zone 2-5, which would be index linked) and more challenging Travel Plan targets (a 10% reduction in single occupancy car trips).

3.10 The HDM consultation response [CD 4.16] also confirmed that whilst the methodology used in the revised traffic assessment contained in the TAA report [CD 1.33] was not fully accepted, including the revised assessment of development traffic that would use Stone Wood Lane, the level of peak hour vehicle trips that had been identified using the route were considered to be reasonable. This was on the basis of the 'Sensitivity Test' trip rates that had been agreed between both parties would be utilised within the TAA, to ensure a sufficiently robust assessment of traffic impact was undertaken. The 'Sensitivity Test' trip rate that was agreed to be used was 0.7 two-way vehicle trips per dwelling (35 vehicle trips in total for 50 dwellings) during both weekday peak hour periods, which the TAA assumed would distribute 47% and 53% via Stone Wood Lane in the AM and PM peak periods respectively. This equated to development trip increases of 16 and 19 two-way vehicle trips in the AM and PM peak periods respectively, which the LPA considered to be a reasonable future scenario given the range of local amenities in Shepley that would be primarily accessed via this route, as well as onward journeys to the south including when gaining access to the motorway network (M1).

3.11 Following a review of the proposed passing place improvements included in the TAA report [CD 1.33], HDM concluded that whilst these works would provide some improvement over the current arrangements along parts of Stone Wood Lane, the improvements are inadequate to mitigate the impact of additional development traffic, with the passing bay provision still falling well short of what would be required to allow the route to function in a safe and efficient manner for all users. Whilst it was appreciated that the Appellant did eventually make some attempt to offer these improvements, it was ultimately concluded that the proposed improvements will not materially improve the current situation, with the improvements offering only marginal benefits for passing traffic and little or no benefit to active travel users, and only provided improvements in locations where passing already takes place (but currently on verges or on unsurfaced areas). The

proposals also do not provide any improvement to the most problematic section of Stone Wood Lane on the approaches to the bend (at Ch. 560 / passing place location PP-I) at the top of the hill at the entrance to Stone Wood (Shepley side). This includes the steep section through the woods, which includes a long single-track section that lacks adequate inter-visibility between the existing passing places at the top and bottom of the hill. The proposals also do not address the sub-standard forward visibility at the bend where the road transitions between the single-track and two-way sections at the top of the hill. The combination of these features already causes frequent conflict issues with vehicles (and other road users), which results in safety and congestions issues, with drivers having to reverse long distances, often in platoons, up and down the hill and around the bend (see further explanation of the various Highway Safety and Operational issues along the route in Section 4).

3.12 Therefore, it was concluded that 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, leading to unacceptable impacts on highway safety and the amenity of active travel users utilising the route, and would compound the existing problems that already exist, which are of particular concern during weekday network peak periods.

3.13 As part of the Appellant's Statement of Case [CD 8.1], a 'Highways and Transportation Statement of Case' (H&T SoC) document [CD 8.2 – Appendix 3], has been provided. This introduced a significant amount of new technical details, including new survey data, that was not submitted at the application stage. The document contradicts or supersedes in a range of areas the Appellant's final Transport Assessment Addendum (TAA) report [CD 1.33] submitted during the planning application determination period. The technical details included in the Appellant's H&T SoC document have been prepared by the Appellant's new transport consultant (their third different consultant). This includes a completely new assessment of development traffic impact on Stone Wood Lane, and significant amounts of additional data and analysis. The H&T SoC document also seeks to reject the use of the 'Sensitivity Test' trip rates that had been agreed between the LPA and the Appellant's previous transport consultant (their second

consultant who produced the TAA report and utilised the 'Sensitivity Test' trip rate therein), which had been agreed to provide a robust assessment and to test a reasonable future scenario, as is required.

3.14 Therefore, I produced a Technical Response [CD 8.4 – 8.8] to the Appellant's H&T SoC document to supplement the Council's main Statement of Case [CD 8.3], which formed part of the Council's Statement of Case. This included a summary of issues where there was agreement, and where necessary, identified where there are areas of disagreement, and presented the Council's updated assessment of the development traffic impact based on the Appellant's new transport consultant's new traffic assessments and data. This information and assessment is now included in this evidence, which includes a review (and additional analysis) of the baseline traffic / speed survey data, personal injury accident (PIA) data and Pedestrian / Cycle / Equine survey data later in Section 3 below, and my updated assessment and review of the development traffic analysis in Section 5.

3.15 In an email received on Monday 19th January 2026 at 17:51 [CD 5.5], the Appellant provided some further new traffic count data (together with amended passing place drawings – see further comments in Section 5). The new traffic data included two surveys undertaken in Stocksmoor on Tuesday 11th and Wednesday 12th November 2025, with the Appellant stating that this new data had now been checked and was to be used within Mr Owen's (the Appellant's latest transport consultant) evidence. The submission of this new traffic count data at this late stage, gives rise to various concerns, which are summarised below:

- The late submission of the data has not given the LPA adequate opportunity to scrutinise the data, in advance of the deadline for the submission of proofs evidence on 27th January 2026.
- Given the date of the surveys, it is disappointing that no mention of the existence of these new traffic counts has been made previously. This includes at the Case Management Conference, where it would have been expected that the intention to introduce this new data would have been highlighted.
- The data has been provided with no context, or information on how it was obtained, or what it will be used for in evidence. There was no mention of this

in the Appellant's Statement of Case. Therefore, it not possible for the LPA do consider this data, in advance of the exchange of proofs of evidence.

- From an inspection of the new data, it is unclear what the data is attempting to show, as the background to the surveys, and the survey methodology is unknown. Notwithstanding this, there are significant issues with the data as presented, which is lacking any flow diagrams and other information needed to understand the data. This includes a lack of information to explain some of the data labels (e.g. what does 'south to Zone 1' mean?). There are also missing headings on various fields in the tables (e.g. there are no time periods shown on some of the tables, which requires the LPA to guess when this data was obtained).
- Notwithstanding the lack of adequate information in the data, the data has also only been provided in PDF format. Therefore, even if the LPA were able to fully interpret the data, which we cannot, any analysis would be a laborious process.
- The LPA had also not been advised in advance of the surveys (as is required, as Kirklees operates a permit scheme for installing count equipment on the highway). Therefore, there is no way that the LPA can now check on the exact conditions on site during the survey, and so it is not possible for us to confirm whether the data is valid, or representative of a typical day.
- The scope of the surveys were also not agreed with the LPA in advance (similar to all of the other new survey data now being submitted at the Appeal stage), so again, the Appellant's approach to data collection, and the traffic assessments in general, has not been undertaken in accordance with good practice, where data gathering and assessment methodologies should be agreed in advance with the LPA.

3.16 In addition to the above concerns, the LPA are aware that there have been significant and ongoing roadworks (water main replacement works) within Stocksmoor, which will have had some impact on these new surveys. This has been checked with the Councils Highways Network Management team, who have confirmed that there were permits in place between 11/11/2025 - 19/12/2025 and from 05/11/26 to the present day (27/01/26), with the works still ongoing. These permits allowed for the provision of 4-way traffic signals at the Cross Lane / Shepley Road / Fulstone Road junction (e.g. within the centre of the new traffic

count cordon), which I had myself observed being in place on site in December 2025. In the email from the Appellant, there was no mention of these roadworks.

3.17 In light of the above, the LPA has significant concerns about the introduction of this new traffic count data, and are unable to provide any comments or response on the findings of the survey at this time. However, should the Inspector be willing to accept this new (and late) submission of data, the LPA has significant reservations about its validity, and reserve the right to comment further in rebuttal evidence in due course, if necessary.

Traffic Surveys

3.18 For the avoidance of doubt, the following commentary relates only to the traffic submitted during the application, and the new survey data submitted within the Appellant's Statement of Case in October/November 2025.

3.19 The Appellant's H&S SoC document [CD 8.2] includes new Automatic Traffic Count (ATC) surveys that have been undertaken since refusal of the planning application. This includes new surveys at five separate locations along the Stone Wood Lane route, with the surveys recording traffic volumes and speeds over a 7-day period from Monday 15th to Sunday 21st of September 2025. A full copy of the survey data sheets were provided within the Appellant's H&S SoC document.

3.20 Whilst these new ATC surveys (i.e. those contained in the H&S SoC document) are unhelpful in some respects, as this new data was clearly not available prior to determination of the planning application and adds a certain level of confusion regarding the traffic data sources, the LPA accepts the new volumetric traffic data obtained from these new ATC surveys as being reasonable, given that the data is generally consistent with the previous ATC surveys that had been carried in similar locations on Stone Wood Lane for the Transport Assessment Addendum (TAA) report [CD 1.33]. In terms of the speed data, again this new data appears to generally accord with previous ATC surveys, so it is also accepted by the LPA. These new ATC surveys also provide additional data on the two steep sections of Shepley Road / Stone Wood Lane, which supplement the previous ATC surveys. Therefore, for the purposes of the Appeal, the LPA also rely on this new ATC data.

3.21 However, in the Appellant's H&S SoC document [CD 8.2], only their new ATC data has been utilised. This approach is not accepted, as some of the previous ATC speed data is required to confirm that adequate visibility is provided at the proposed site access (e.g. the ATC data from both the original TA[CD 1.23] and the TAA[CD 1.33] reports is required for this purpose). The previous ATC data (including the ATC data from both the TA and TAA reports) is also helpful, as it provides two additional weeks of traffic flow data (with the new ATC data, this then covers three separate weeks, during different months, in April 2024, December 2024 & September 2025), which can be used for comparison purposes. Therefore, some of the previous ATC data continues to be used by the LPA as part of the assessment of the development, in addition to the new ATC survey data. A summary of the ATC data now utilised in this evidence is as follows:

- TA by AMA [CD 1.23]data Site 1 (At proposed site access) - w/c Friday 12/04/24
- TAA by TPS [CD 1.33] data Site 2 (On hill circa 30m south of the proposed site access at 30mph/NSL Transition) - w/c Friday 13/12/24
- H&T SoC by Optima [CD 8.2] data Site 1 (On hill circa 110m south of the proposed site access) - w/c 15/09/26
- H&T SoC by Optima [CD 8.2] data Site 2 (On hill though single-track section through woods at circa 740m chainage) - w/c 15/09/26
- H&T SoC by Optima [CD 8.2] data Site 3 (South of bend at top of hill through woods at circa 530m chainage) - w/c 15/09/26
- H&T SoC by Optima [CD 8.2] data Site 4 (South of single-track section at circa 320m chainage) - w/c 15/09/26
- H&T SoC by Optima [CD 8.2] data Site 5 (North of single-track section closest to Jos Lane at circa 120m chainage) - w/c 15/09/26

3.22 The results of the seven ATC surveys identified above have been analysed and the traffic flow data now utilised by the LPA is summarised in the tables contained at **Appendix A** of this evidence (and as already included in the Council's Statement of Case, Appendix 1 - Technical Response [CD 8.4 & 8.5]).These tables include some additional data analysis that has not be included in the Appellant's H&S SoC document [CD 8.2]. However, as this data is based on the Appellant's ATC survey data, which they have submitted in support of the proposals at various stages, there should be no reason for the Appellant to question the validity of the

data. However, as yet they have not agreed to include this in the Statement of Common Ground.

3.23 The following Table 1 includes the weekday peak hour two-way vehicle flows on Shepley Road / Stone Wood Lane between the Appeal site and Shepley, which now informs the LPA assessment of the development. This includes the 'maximum average weekday' and 'maximum weekday' two-way vehicle flows – see Table 1 below:

	Table 1 - Weekday Peak Hour Two-way Flows			
	AM Peak (0800-0900)		**PM Peak (1700-1800)**	
	Vehicles	**Data Source**	**Vehicles**	**Data Source**
Max. Average Weekday (Row A)	69	TA w/c 12/04/24	74	H&T SoC w/c 15/09/25
Max. Weekday (Row B)	90	TA on 12/04/24	89	H&T SoC on 18/09/25

3.24 The data in Table 1 shows that the 'maximum average weekday' two-way vehicle flows were 69 (from the w/c 12/04/24 ATC survey) and 74 (from the w/c 18/09/25 ATC surveys) vehicles respectively, and is the data that is now utilised in this evidence, to ensure that a robust assessment of development traffic impact is considered. This data analysis is slightly different to that used by the Appellant in their new traffic assessment analysis contained in their H&T SoC document [CD 8.2] (that identified 65 and 74 two-way vehicles in the weekday AM and PM peak periods respectively), as the Appellant has not sought to utilise the previous ATC survey data, which the LPA considers to be a less robust approach.

3.25 The data in Table 1 also shows the 'maximum weekday' two-way peak hour vehicle flows were 90 (from the 12/04/24 ATC survey) and 89 (from the 18/09/25 ATC surveys) vehicles in the AM and PM peak periods respectively, which are also used to inform the LPA assessment of the development, but have not been used in the Appellant's new assessment, as they have not sought to consider the 'maximum weekday' two-way peak hour vehicle flows.

3.26 The additional ATC survey summary data (produced by the LPA) in **Appendix A** of this evidence, also includes other data analysis that has been used to inform the LPA's assessment of the development (this includes additional weekly traffic

flow data, which has been used to respond to the Appellant's assessment of the personal injury accident data).

3.27 In the Appellant's H&S SoC document, they have identified average and 85th percentile speed data along the Shepley Road / Stone Wood Lane route (but using their new ATC survey data only). However, the LPA do not accept that average speed data is of relevance in this situation, as it not typically used for traffic engineering assessment purposes, where 85th percentile data is used. Also, the speed data (particularly that obtained on the single-track sections of Stone Wood Lane) will not have been recorded in entirely free flow conditions (due to vehicles slowing when passing other highway users or potentially reversing), may have been undertaken in wet conditions, and the summary analysis includes network peak hour speed data, all of which are contrary to the guidance contained in 'CA185 - Vehicle speed measurement' [CD 7.20] contained in the Design Manual for Roads and Bridges (DMRB). Notwithstanding these potential issues (and taking into account that the aforementioned DMRB document is guidance, as it is a standard to be applied rigidly to the Trunk Road and Motorway Network only), it appears that there are not substantial variations in the recorded speeds outside of network peak periods. Therefore, as this is the best speed data that is available at this time, the LPA accepts that the 85th percentile data can be used for assessment purposes. However, the speed survey data within the vicinity of the single-track sections of Stone Wood Lane needs to be treated with caution.

3.28 The additional ATC survey analysis included in **Appendix A** of this evidence, includes the speed data at all seven ATC survey sites previously mentioned, which include the ATC survey data at the site access ('TA Site 1') and the later data obtained to the south of the Appeal site access ('TAA Site2' located circa 30m to the south of the proposed site access), which were used to determine the site access visibility splay looking to / from the south (2.4x38m SSD is required, which is based on the higher speed reading of 27.4mph recorded in the original 'TA Site 1' data for vehicles heading towards Stocksmoor, passed the proposed site access). The seven ATC surveys along Shepley Road / Stone Wood Lane indicate 85th percentile speeds ranging from 22.1 - 33.3mph. The data also shows some high speed readings in certain locations, with recorded speeds of 40mph or more

at 5 of the 7 count sites, and at 2 of the sites there is a recorded speed in excess of 50mph.

3.29 In summary, the LPA accepts the Appellant's new ATC data (i.e. those contained in the H&S SoC document) can be used for assessment purposes, on the basis that it is used in conjunction with the previous ATC data used to inform the assessments previously undertaken by the Council and the Appellant (but only the two ATC surveys, from the Appellant's TA and TAA report previously mentioned, to supplement the Appellant's new data). However, the average speed data that has been referenced by the Appellant is not considered to be relevant to the case. The ATC surveys have also not been undertaken in full accordance with good practice. As such, the results need to be treated with caution and are likely to be an underestimate of traffic speeds, particularly along the single-track sections of Stone Wood Lane, as all speed data was not obtained in free flow conditions. This evidence also references the more robust base traffic flows obtained from the three sets of ATC data (as set out in Table 1 above), to ensure a robust assessment of development traffic impact is considered.

Pedestrian/Cycle/Equine Surveys

3.30 The Appellant's H&S SoC [CD 8.2] includes new 'Pedestrian / Cycle / Equine Surveys' on Shepley Road / Stone Wood Lane, which it states was *'in order to capture active travel user trips along the route'*. However, the LPA raise a number of issues with the new data as follows:

- As confirmed in the Appellants H&S SoC document, there was a problem with the count equipment at one end of the route during the first Saturday survey, resulting in that survey needing to be redone. Therefore, the Saturday survey data (combined from two separate data sources) provides an incomplete and somewhat unreliable record of users along the route (e.g. the stated purpose of the survey).
- The Appellant's H&S SoC document includes details of two public rights of way that connect with Stone Wood Lane, including KIR/137/20 to the east (accessed opposite Jenkyn Lane near ch.10) and KIR/191/10 (accessed from the low point in Stone Wood Lane near ch.810). However, there are additional footpath connections located near Ch. 540 (See red arrows on Figure 1 below, which

also includes a further access to the woods at and Ch. 790), which lead into Lower Stone Wood and Upper Stone Wood to the north and south of Stone Wood Lane respectively, which provide onward connections to the wider footpath network. Whilst these paths are not recorded on the Council's Definitive Map and Statement, they are well established and well used footpaths (based on my on-site observations), which have not been mentioned in the H&S SoC document or picked up in the survey data. Therefore, this omission also affects the reliability of the new survey data, and may explain why the active travel user flows at either end of Shepley Road & Stone Wood Lane do not match for the weekday survey (they can't match for the weekend survey as they were undertaken on different days), with some users taking circular walks through the wood that may not be picked up in the data.

- All of the surveys were undertaken in Autumn, when active travel users are unlikely to be at their peak (e.g. this would be more likely in summer months). Similarly, for the redone Saturday survey, this was undertaken during wet conditions, and it is clear from the data that this has suppressed the active travel user flow data. This is clear as the data undertaken at the Shepley Road end of the route, which the survey data sheets suggests was undertaken in dry conditions for both survey days, shows that the active travel users at the weekend (52 users over the 12hr survey) were substantially higher than the weekday data (31 users over the 12hr survey). However, for the data obtained on Stone Wood Lane to the southeast, which includes the redone weekend data obtained in wet conditions, this shows the complete opposite, with substantially fewer active travel users (8 users over the 12hr survey) for the weekend survey than for the weekday data (24 users of the 12hr survey). Therefore, the weekend survey data undertaken in wet conditions is not useful for assessment purposes.

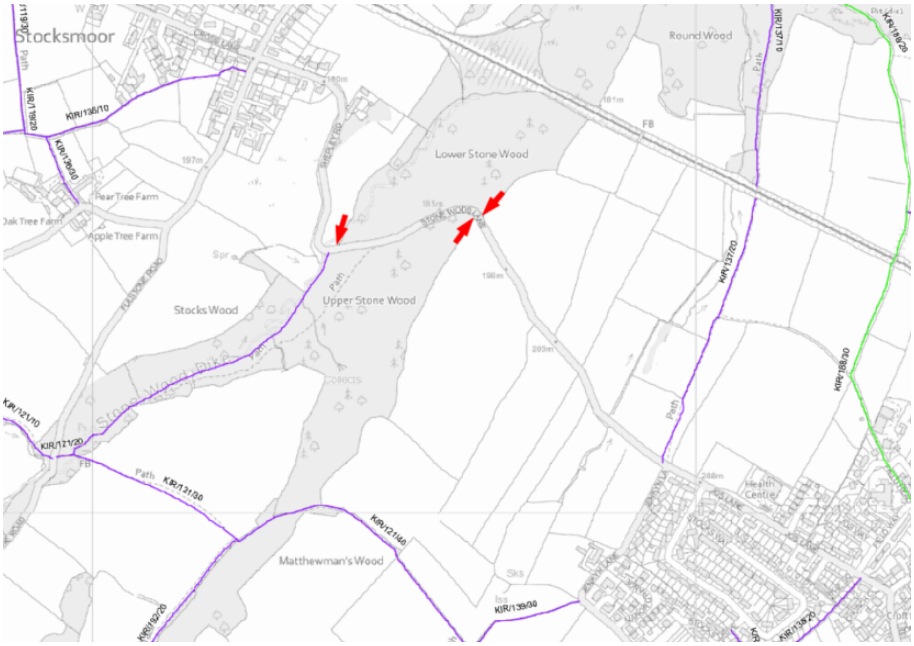

Figure 1 – Location of (unrecorded) footpath entrances at Ch.540 & Ch.790 on Stone Wood Lane

3.31 In light of these issues, it is considered that the new Pedestrian / Cycle / Equine Survey data included in the H&S SoC document is unreliable, and limited weight can be given to the data. The data only provides a snapshot of active travel user activity, so also does not form a robust basis for assessment. That said, I note that the data for both the AM and PM weekday peak hour periods indicate lower active travel flows than for the hours on either side of these time periods, which provide some evidence (but of limited weight due to the deficiencies with the data, and it being only a snapshot of user activity) that active travel users are already avoiding Stone Wood Lane during the busier weekday AM and PM network peak traffic periods. For ease of reference, I have summarised the survey data for the hourly periods in **Appendix E**.

Existing Personal Injury Accident Data

3.32 Up to date Personal Injury Accident (PIA) data has been included in the Appellant's H&S SoC document [CD 8.2], covering a 15 year period, from 1st July 2010 to 30th June 2025. The search area includes the full length (1.2km) of the Shepley Road / Stone Wood Lane corridor between the Station Road / Cross Lane and Jenkyn Lane / Jos Lane junctions. The search confirmed that there has been one recorded incident that involved two vehicles, and resulted in a single 'slight' injury to one of the vehicle drivers, which occurred at the Shepley Road / Cross Lane junction.

3.33 The LPA can confirm that this collision search information is factually correct. However, I dispute the findings set out in the H&S SoC document, which states:

> *'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.'*

3.34 The lack of personal injury related incidents along the route is not evidence that the road operates safely. PIA data only includes incidents that resulted in personal injury, and that were reported to the Police (or were otherwise recorded e.g. through hospital admissions). The data also does not record damage only type incidents. Therefore, the PIA record is an incomplete record of 'accidents' on Stone Wood Lane, and it is wrong to surmise that this confirms the road operates safely.

3.35 To illustrate this point, data from the latest Reported Road Casualty Great Britain (RRCGB-2024): Annual Monitoring (2024) [CD 7.14] can be utilised, which identifies casualty rates on rural roads at Table 10 of the monitoring report. When this casualty rate data is applied to the 1.2km length of Shepley Road / Stone Wood Lane along the Appellant's study area, and utilising the weekly traffic flows recorded from the various ATC surveys (between 3,599 - 4,323 vehicles per week), this equates to an average casualty rate of 0.04 - 0.05 casualties per year or 1 casualty every 20 - 25 years. Therefore, the fact that there has only been 1 incident within the study area (and none on the most sub-standard section of Stone Wood Lane), which resulted in 1 casualty, has no statistical significance. It is noted that the incident that has been identified by the Appellant at the Shepley Road / Cross Lane junction involved two vehicles. Thankfully this incident only resulted in one casualty. However, it is only by chance (accidents are often defined as random multi-factor events) that both drivers were not injured. Had this been the case, then then the casualty rate would be well above the 15 year average (based on this generalised metric, which is provided for illustrative purposes only, and similarly has no statistical significance). This demonstrates that no statistical significance can be placed on the rate of 'accidents' along Stone Wood Lane, which the Appellant uses as their main justification why they consider the route *'operates safely in practice'*, which is an incorrect assumption.

3.36 It is also noted that given the sub-standard nature of Stone Wood Lane, it is likely that damage only type incidents are frequent occurrences, with incidents of varying degrees of severity (but that may have not resulted in a reported injury incident). This has been alluded to in a number of public comments made regarding the Appeal site. Also of note are incidents that have been described on a number of occasions in the public comments (and have also been personally mentioned to me by a member of the public when I have undertaken a site visit on Stone Wood Lane on 16/12/25). The first incident described related to a head on collision between two vehicles that has been mentioned at the top of the hill on exit of Stone Wood (Passing Place location PP-I), and the second being a loss of control type incident at the bottom of the hill at the start of Stone Wood, which it has been suggested resulted in the bridge structure being damaged. Whilst this is only anecdotal evidence and must be treated with caution, there is also no reason to doubt that these incidents occurred.

3.37 In summary, the LPA disagrees with the Appellant's assumption that the Personal Injury Accident (PIA) record demonstrates that Stone Wood Lane *'operates safely in practice'*, which is a flawed assumption. The Appellant's assessment also ignores the high number of comments from local people, who have identified safety concerns along the route, and have identified a number of incidents that that they are aware of that do not form part of the PIA record (as damage only non-injury related incidents are not recorded).

Site Accessibility

3.38 The Appellant's H&T SoC document [CD 8.2] sets out in broad terms the Appeal sites accessibility by active and sustainable transport modes, and concludes that:

> *'As such the Site is in a sustainable location and 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."'*

3.39 The Appellant's H&T SoC document [CD 8.2] goes on to quote sections from the Council's Delegation Report that concluded by stating:

'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.'

3.40 The LPA do not dispute that the Appeal site's location can be regarded as sustainable (in accessibility terms), when taking into account it's rural context at the edge of the existing settlement of Stocksmoor.

3.41 However, the site's accessibility by active and sustainable transport modes is relatively low, which is demonstrated by the Department for Transport's (DfT) 'Connectivity Tool Lite', which has been applied to the Appeal site. A copy of the output is included in **Appendix B**.

3.42 The site's relatively low level of accessibility is likely to result in development users being heavily reliant on car use, which has not been reflected in the various vehicle trip generation assessments that have been undertaken by the Appellant's various consultant's in all of their assessments (this includes the latest revised assessment included in the Appellant's H&T SoC [CD 8.2], which only considers vehicle trips). Therefore, it is considered that Appellant has not undertaken a robust assessment of development trips (by all modes), which potentially under-estimating the development's vehicle trip generation.

3.43 Also, none of the Appellant's trip generation assessments have considered the modal split or trip generations for other modes than motor vehicles. This results in a lack of consideration of the development trips by active travel modes, some of which are likely to utilise Stone Wood Lane to access local services and for leisure purposes. Therefore, the additional active travel trips that would be generated along Stone Wood Lane have not been assessed.

3.44 The Appellant's various transport assessments have also lacked a detailed qualitative assessment of the active travel provision within the vicinity of the site, including consideration of the active travel user provision (or lack of) on Stone Wood Lane.

3.45 Therefore, all of these factors result in all of the Appellant's various transport assessments (and trip generation assessments) not being robust, and failing to comply with the 'Planning Practice Guidance (PPG) - Travel Plans, Transport Assessments and Statements' [Paragraph: 015 Reference ID: 42-015-20140306, bullet points 4, 9, 11 & 12] and Active Travel England (ATE) 'Standing Advice Note: Active Travel and Sustainable Development' [CD 7.15 - toolkit criterion 1-5].

4. Existing Constraints and Safety / Operational Issues

Introduction

4.1 The Appellant has suggested [CD 8.2, paragraph 3.2.9] that it is only the most constrained section of Stone Wood Lane between Ch. 0 and Ch. 800 that is of concern to the LPA. This is not the case, as the full 1.05km length of Stone Wood Lane (& Shepley Road) between the site access and Jos Lane in Shepley is of concern. This is due to the various physical constraints and safety / operations issues along the full length of the route, which would be exacerbated by the intensification in use from development traffic, and are not proposed to be adequately mitigated, giving rise to highway safety / operational concerns. However, it is agreed that it is the most constrained section mentioned above that is of most concern.

4.2 The Appellant has accepted that Stone Wood Lane has several physical constraints both in the submitted TAA report [CD 1.33], and in their H&T SoC [CD 8.2 paragraph 3.2.13], where it states:

> *'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.'*

4.3 Whilst it is welcome that the Appellant has acknowledged some of these constraints, their assessment of these constraints, and consideration of the highway safety risks and operational matters is not accepted. This includes the point made at paragraph 3.2.19 of their H&T SoC [CD 8.2], which states:

> *'3.2.19 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).'*

4.4 The LPA do not accept the above, which is not the view expressed by local people, or reflect my own experience when visiting the route on numerous occasions,

including during the busier (in terms of vehicular traffic) network peak periods. Based on my own experience as a pedestrian using the route, passing traffic can be intimidating, with drivers often failing to reduce their speed when passing, even on the most constrained sections of the route.

4.5 Therefore, it is considered that the Appellant has not adequately considered the safety risks for all users along Stone Wood Lane; nor have they considered the perception of safety, which is an important consideration, as if active travel users do not feel safe using the route, they will not use it (or will avoid peak periods, which may already be the case). This results in the Appellant underestimating the adverse impact of additional development traffic along this highly constrained and sub-standard rural road.

4.6 To put these matters into context, the following points are noted:

- *'PPR026 - Accident analysis on rural roads - A technical guide (2004)'*, by TRL Limited [CD 7.13] states at paragraph 4.14:

  'In the case of rural roads (and particularly Vulnerable Road Users on rural roads)….although accident and casualty numbers may be low, the accident risk associated with them is very high.' ; and

- *'Reported road casualties Great Britain annual report: 2024'* (RRCGB 2024) [CD 7.14] states at Section 7 (third paragraph):

  '….fatalities on roads in rural areas (60%) are over represented compared to the proportion of traffic on roads in rural areas (45%).'

- The *'NFU Mutual Rural Road Safety Report 2025'* [CD 7.12] states in the Foreword (first and second paragraphs):

  'In the 10 years to the end of 2024, 10,000 lives were lost on Britain's rural roads. To put that into perspective, that's almost three loved ones killed each day over the last decade.

  Every road death is a needless tragedy, but this staggering loss of life becomes even more concerning when considering that people are significantly more likely to lose their lives on countryside roads than any other type of road. In the last ten years, two-thirds more people have been killed on rural roads

than on urban roads. Put simply, rural roads are persistently and disproportionately dangerous for those using them, whether they are motorists, cyclists, pedestrians or horse riders.'

4.7 The above points highlight the importance of carefully considering highway safety issues along rural roads, such as Stone Wood Lane, and in particular, the risks associated with vulnerable road users (e.g. active travel users, including pedestrians, cyclists and horse riders), which is a key consideration for the development that the Appellant has discounted as not being a significant problem.

4.8 Kirklees Council have committed to the implement the West Yorkshire Vision Zero strategy, with a summary of the what this means in their *'West Yorkshire Vision Zero - Strategy on a page 2024 – 2027'* document [CD 7.11]. This commits to the aim of reducing deaths and serious injury on our roads by 2040. Kirklees Council has confirmed its commitment to this, in the recently adopted '*Kirklees Transport Strategy, 2025'* [CD 6.29], which includes *'Policy S-2'* (see page 31-32) that commits to implement the Vision Zero strategy.

4.9 The above demonstrates Kirklees Council's ongoing commitment to improving highway safety, and working towards the aim to *'eliminate all traffic deaths and serious injuries, while increasing safe, healthy, equitable mobility.'* [CD 6.29 page 32]. This can only be achieved if new developments play their part, ensuring there are no detrimental residual impacts from the development on highway safety.

4.10 The remainder of this section sets out the some of the existing constraints, and safety / operational issues that currently exist along Stone Wood Lane, which could be impacted by additional development traffic if not adequately and appropriately mitigated.

Visibility

4.11 Ensuring there is adequate visibility for all road users is one of, if not the most important highway design parameters, which is required to allow the highway to be used safely. However, on Stone Wood Lane there are multiple horizontal and vertical constraints, including frequent bends (and vertical alignment issues), which reduce forward visibility below minimum design requirements. Therefore, rather than this being describing as *'reduced forward visibility'*, which is how the

Appellant has put it, it is more accurate to describe visibility along the route as being sub-standard in various locations.

4.12 Adequate forward visibility is required to ensure that road users can avoid a collision with another road user, or other hazard they may encounter within the highway (e.g. a fallen tree). In the case of Stone Wood Lane, the lack of adequate inter-visibility between motor vehicle traffic and active travel users is a significant highway safety risk factor, since the entire length of the route operates as a shared surface highway. The lack of adequate forward visibility for drivers often requires pedestrians to quickly step off the carriageway (where there is space to do so), to avoid this passing traffic. However, this is not possible in many locations along the route, where there is little if any space for pedestrians to clear the carriageway. It is also not possible (or acceptable) for cyclists and horse riders to be forced to clear the carriageway when they encounter passing vehicles.

4.13 Adequate inter-visibility between passing places is also a key issue, as drivers / riders entering the single-track sections need to be able to see in advance that their exit is clear, before deciding to proceed, or yielding to allow an oncoming vehicle to pass. Where there is inadequate inter-visibility between passing places, this results in conflicts between traffic (all modes) and requires drivers / riders to reverse back to allow passing to occur. Due to the constrained width and alignment of Stone Wood Lane, and the lack of good quality passing places, this results in lengthy and difficult reversing manoeuvres (due to the frequent bends, steep gradients, and narrow carriageway widths etc.). This presents a significant highway safety risk factor for all road users, but is of most concern for active travel users, such as pedestrians, who are forced to wait in close proximity to these reversing vehicles in the shared surface road, or in the narrow verges (where they exist), until all vehicles have passed. These issues are compounded when multiple vehicles are involved, as drivers need to coordinate their manoeuvres. This significantly increasing the risks for all users, as drivers can easily be distracted from other hazards, such as waiting pedestrians (and other active travel users), when concentrating on completing these difficult manoeuvres. The time it takes for these incidents to be resolved also increases when more vehicles are involved, increasing the delay (and exposure to risk) of waiting active travel users.

4.14 There are various bends along the route that have sub-standard forward visibility. One of the locations that is of most concern is on the approaches to the bend (at Ch.560, passing place location PP-I), at the top of the hill at the entrance to Stone Wood (Shepley side), and in particular for drivers/riders approaching from Shepley, as the road transitions from a two-way passing section at the downhill bend, to a single-track section heading downhill through Stone Wood. Forward visibility is restricted at the bend due to the embankments, trees and walls on the inside of the bend, which can be seen on the images below (Photo 2 - Taken at approximately Ch.560 / PP-I, with a 1.5m offset from the carriageway edge and a driver eye height of 1.05m - The bend can also be seen in the wider context on Photo 3).

Photo 2 - Taken approximately at Ch. 560 looking in Stocksmoor direction

4.15 The recorded vehicle speeds on approach to this bend (See the H&T SoC [CD 8.2] ATC Site 3 data, which I have summarised in **Appendix A**, and was located around Ch. 530), identified 85th percentile speeds of 22.1mph (and the occasional speed of between 35-40mph) on the Stocksmoor bound approach to the bend (downhill towards the single-track section). Based on the Stopping Sight Distance (SSD) guidance contained in Manual for Streets 1 (MFS1) [CD 7.3 Section 7.5], the required stopping site distance (SSD) at 22.1mph is calculated at 28m SSD. This is based on a perception / reaction time of 1.5 seconds, and a deceleration rate of 0.45g (4.4m/s2), values recommended in MfS for lower speed situations

(e.g. where 85th percentile speeds are below 37mph), and where the proportion of HGVs is low (as is the case on Stone Wood Lane). MfS2 [CD 7.4 paragraph 10.1.5] also provides additional guidance on how to account for downhill gradients in the SSD calculations, which if applied in this situation, where there is a relatively steep downhill gradient on approach to the bend, would increase this SSD requirement. However, for simplicity (and as even this lower SSD value is not achievable), only the lower 28m SSD requirement has been considered below.

4.16 To demonstrate that adequate forward visibility is not available at the bend (near PP-I), I have plotted the 28m SSD forward visibility envelope, drawn from a driver/rider eye position of 1.5m from the inside edge of carriageway. This is the area that needs to be maintained free of all obstructions (both horizontal and vertical), to allow the minimum level of forward visibility to be achieved, which is shown on Plan 1 included at **Appendix F** (orange shaded area on inset 1).

4.17 As can be seen from the above plan (and Photo 2), forward visibility is restricted due to the wall and embankment on the inside of the bend. To address this issue, an option may be to set back the wall and embankment. This could result in the loss of the mature tree that can be seen above the wall, so was not considered by the Appellant (and for other reasons, including the significant costs that would be involved). Therefore, it is clear that there is sub-standard forward visibility at the bend, which gives rise to significant highway safety concerns, due the risk of vehicles colliding with a pedestrian (or other active travel user, such as an oncoming cyclist) at the bend on this shared surface road, or with an oncoming vehicle exiting the single-track section.

4.18 The above SSD requirement relates to the distance required for a vehicle to stop, to avoid a collision with a stationary object in the carriageway (or a slow moving pedestrian etc). However, given that the bend is at the point where the road transitions (e.g. where the carriageway reduces below 4.8m width around Ch. 556 / PP-I - see separate comments below relating to carriageway widths) from two-way (at the bend) to single-track (on the hill through the woods), it is not only the speed of the individual vehicle that needs to be taken into account. It is also necessary to consider the closing speed of opposing vehicles approaching the transition point in opposite directions. Assuming that a motor vehicle driver / rider

is travelling uphill towards the transition point at the same speed as the oncoming driver (e.g. 22mph – although it is likely to be higher, as drivers need to use their accelerator to maintain momentum when travelling up the steep hill), this would be a closing speed of 44mph. This would affectively double the visibility requirement to 56m (e.g. 2 x 28m SSD) to allow opposing drivers to stop before reaching the conflict point, which is not available. It is noted that this issue may have been a contributory factor to the head on collision that has been mentioned by local people may have occurred at the bend (although I cannot verify the circumstances of the incident, as the incident is not captured in the personal injury accident record, so I cannot comment further on the circumstances).

4.19 In additional to the lack of adequate forward visibility at the bend and transition point (at around Ch. 556 / PP-I), it is clear that there is not adequate inter-visibility between the passing places at either end of the hill through the woods (this section is below 4.8m wide between Ch. 556 / PP-I and Ch. 706 / PP-J, a distance of approximately 150m, where a car cannot pass a van comfortably), which the Appellant has acknowledged is an important requirement to allow passing places to function safely and effectively [CD 8.2 paragraph 6.2.31], and for the reasons I have previously described.

4.20 To demonstrate that adequate inter-visibility between passing places is not available, I have plotted the minimum inter-visibility sight line that is required. This has been drawn from a driver / rider eye position 1.5m from the inside edge of carriageway and a setback distance of 2.4m back from the transition point to the single-track section. Whilst I do not accept that 4.1m is adequate for cars to safely pass, as has been suggested by the Appellant (see separate comments below relating to carriageway widths), I have plotted the inter-visibility from the transition point where the carriageway reduces below 4.1m (around Ch. 562 / PP-I & Ch. 696 / PP-J, a distance of circa 134m), to conclusively demonstrate that adequate inter-visibility is not available between passing places in this location. This has been shown (red solid line) on Plan 1 – inset 2, included at **Appendix F**.

4.21 This demonstrates that adequate inter-visibility between the passing places at the top and bottom on the hill through the single-track section in Stone Wood is not available. This is particularly problematic in this location, due to the steep gradient

and the length of the single-track section (circa 134m is below 4.1m and 150m below 4.8m). This results in frequent conflict issues for drivers (and other road users), congestion issues (with associated delay to active travel users), and requires drivers to reverse long distances, often in platoons, up and down the hill and around the bend. These issues give rise to road safety concerns, with pedestrians and other active travel users being most at risk from these reversing vehicles.

4.22 It is noted that the inter-visibility sight line I have indicated, is the absolute minimum that is required, as it has been drawn from the driver eye position at the transition point between the single-track and two-way sections. However, in practice, drivers need to be able see in advance of this point (e.g. if they pass this point, they would need to reverse, if they meet an oncoming vehicle or cyclist etc), as most drivers / riders will not come to a stop at the transition point to observe the exit to the single track-section is clear, unless they have seen (or are otherwise aware e.g. via a car horn) that an oncoming road user is approaching.

4.23 In preparation for the Inquiry, I carried a site visit on Wednesday 3rd December 2025 (one of a number of preparatory visits), where I observed all traffic (both directions and by all modes) at the bend on entry to Stone Wood (observing from a safe point off the carriageway around Ch. 540 / PP-I), for a 1 hour period between 0800-0900 (e.g. the AM peak). The road surface was slightly wet from earlier rain, but the weather was fine and dry throughout the visit. To confirm that I was observing typical traffic flow levels, I counted passing traffic, with 85 two-way vehicles observed during the 1 hour period. Therefore, this appeared to represent typical usage of the route (e.g. the maximum observed flow from the Appellant's 3 weeks of ATC data is 90 two-way vehicles in the AM Peak).

4.24 During the site visit, I observed the following:

- No HGV's were observed, so I did not identify any drivers ignoring the unsuitable for HGV signage that exists at either end of the route. However, 4 open back builder's trucks (under 7.5t) were noted, together with multiple vans, including home delivery vehicles.
- There were several (5+) occasions when vehicles had entered (or were just about to enter) the single-track section heading down hill towards Stocksmoor,

where they encountered an oncoming vehicle and had to reverse back up hill (to varying degrees). Photo 3 below shows one such occurrence I observed during this site visit, with the small car reversing back from the bend to allow the orange van to pass.

- On one occasion, the same driver was forced to reverse back twice, due to encountering vehicles on two attempts to use the single-track section, with the second time being a longer reversing manoeuvre than the first occurrence (as they had driven out of my sight down the hill after the first incident, before reversing back up the hill and around the bend).

- On another occasion, there was a particularly problematic incident, as the driver struggled to reverse up hill and around the bend, and their vehicle started to mount the edge of the embankment on the inside of the bend, at which point the driver was unwilling (understandably) to reverse any further. There was then a stand-off (less than a minute) when neither driver would / could move off, and eventually the Shepley bound driver decided to drive very close to the embankment on the outside of the bend to complete the passing manoeuvre. This incident was clearly a difficult situation (and potentially frustrating) for both drivers, with the driver heading toward Stocksmoor sounding their horn for a long burst (perhaps 3-4 seconds) as they drove off downhill.

- I observed passing vehicles often travelling in platoons of 2 (and occasional 3) vehicles. This is likely to have been the case, due to hold ups earlier along their journey along Stone Wood Lane, due to meeting other oncoming traffic at an earlier single-track section, resulting in ‘bunching’ of the traffic.

- I heard multiple times other drivers briefly sounding their horns. These vehicles were out of my sight within the Stone Wood section, but I assume these were drivers trying to alert others of their presence.

- I did not observe any pedestrians walking up or down the hill during the AM peak hour period. However, there were 6 adult pedestrians, some walking dogs, who either crossed Stone Wood Lane between the two (unregistered) footpath connections between the woods at the top of the hill (around PP-I), or routing from these paths via Stone Wood Lane to / from Shepley.

Photo 3 – From site visit of 03/12/25 showing vehicle conflict and reversing from bend

4.25 None of the above incidents of vehicles meeting at the bend and single-track section resulted in a collision. However, they are likely to have been uncomfortable and frustrating for those involved, and had the road surface been icy, a collision may have occurred (although it would also be expected that drivers would travel slower, in accordance with the conditions). Also, had any pedestrians been present within the immediate vicinity of these reversing / manoeuvring vehicles, they would have been at significant risk, as there is limited scope to step off the carriageway within the immediate vicinity of the transition to the single-track section (or on the single-track section itself), which is potentially why pedestrians may already be avoiding using the route during network peak periods.

4.26 A similar problem of restricted forward visibility and lack of adequate inter-visibility between passing places exists further to the south at Ch. 340 (PP-E), which can be seen on the image below (Photo 4 - Taken at approximately Ch.338, with a circa 1.5m offset from the usable highway edge, and a driver eye height of 1.05m, in the current informal passing bay that the development proposes to hard pave).

Photo 4 - Taken approximately at Ch. 338 looking in Stocksmoor direction

4.27 As can be seen from the photo, you can neither see the next available passing place from this location, nor around the bend due to the trees (including a large oak tree) on the inside of the bend. It is also noted that this is a best-case scenario in terms of visibility, as drivers would not typically pull to the left in this location, unless they saw an oncoming vehicle approaching, and would usually be further to the right where visibility is further reduced. The photo was also taken in autumn, so visibility is further restricted when the trees are in leaf (as I have observed on other site visits).

4.28 To demonstrate that adequate forward visibility is not available at the bend at Ch. 360 (e.g. northwest of PP-E, where the large oak tree can be seen on the right hand side of Photo 4, which is unfortunately not shown on the Appellant's survey drawings), the northbound speed data from H&T SoC [CD 8.2] ATC Site 4 (at Ch.320) summarised in **Appendix A** has been utilised. This indicated northbound 85th percentile speeds of 27.8mph (and the occasional speed of between 35-40mph). Based on the Stopping Sight Distance (SSD) guidance contained in Manual for Streets [CD 7.3], the required stopping site distance (SSD) at 27.8mph is calculated at 39m (using the same parameters I have identified above). To demonstrate that adequate forward visibility is not available at the bend, I have plotted the 39m SSD forward visibility envelope, drawn from a driver/rider eye position of 1.5m from the inside edge of the road. This is the area that needs to be

maintained free of all obstructions (both horizontal and vertical), to allow the minimum level of forward visibility to be achieved to allow a driver / rider to observe a stationary object, which is shown on Plan 2 included at **Appendix F** (orange shaded area on inset 1).

4.29 As can be seen from Plan 2 (inset 1) in **Appendix F** and Photo 4 above, forward visibility is restricted due to the tree and vegetation on the inside of the bend. To address this issue, it would be necessary clear all of the vegetation and trees on the inside of the bend. However, this is unlikely to be feasible or desirable, as it would involve removing a large mature oak tree that straddles the highway boundary (and so is beyond the highway boundary and would require agreement from the adjacent landowner), as well as other vegetation that is beyond the highway boundary. It would also require land acquisition to allow the forward visibility to be protected from any future regrowth.

4.30 As previously mentioned, it is also the closing speed of vehicles that also needs to be taken into account at the single-track sections, which effectively doubles the SSD requirements (e.g. to potentially 2 x 39m = 78m, if the approach speeds were the same). Clearly this cannot be achieved, given that the 39m SSD is not achievable.

4.31 To demonstrate that adequate inter-visibility between passing places is not available in this location, I have plotted the minimum required inter-visibility. As above, whilst I do not accept that 4.1m is adequate for cars to safely pass, as suggested by the Appellant, the inter-visibility has been plotted from the transition point where the available width reduces below 4.1m (circa Ch. 340 / PP-E & circa Ch. 390 / PP-F, a distance of approximately 50m), to conclusively demonstrate that adequate inter-visibility is not available. This has been shown (red solid line) on Plan 2 – inset 2, included at **Appendix F**.

4.32 The lack of adequate forward visibility at the bend, and lack of inter-visibility between passing places in this location, causes similar problems for all road users as previously described, with active travel users being most at risk of a collision with an unsighted driver approaching them in the opposite direction. The following image (Photo 5 - Taken looking southeast towards the transition point at Ch. 340 / PP-E) illustrates this point, with the group of cyclists seen in the photo being at

risk of a collision, had they met an unsighted northwest bound (to Stocksmoor) driver / rider entering the single-track section.

Photo 5 - Taken looking southeast towards Ch. 340 / PP-E in the Shepley direction

4.33 In summary, there are multiple locations along Stone Wood Lane where there is sub-standard visibility (both forward visibility and inter-visibility between passing places). This causes significant highway safety risks, which would be exacerbated by additional development traffic along the route. The highway safety and operational issues I have identified at the specific locations and mentioned above, will not being mitigated by the passing place improvements that are proposed by the development. This includes at the bend at Ch. 560 / PP-I, which is of greatest concern, due to the existing highway safety / operational issues in this location (at the bend at the top of the hill at the entrance to Stone Wood), with no improvement works being proposed in this area that would have any influence on the issues I have identified.

Passing Places

4.34 The Appellant has acknowledged that the passing place provision on Stone Wood Lane is sub-standard. However, they have gone to some length to question the research and guidance documents referenced by the LPA. This included TAL 2/04 'Rural Traffic Calming: Bird Lane, Essex', produced by the Department for Transport (DfT) [CD 7.7] referenced in the Council's HDM Team consultation response of 11/04/25 [CD 4.16] and the earlier detailed research that informed this

guidance (TRRL Advice Note TSN29), which was highlighted (with an extracted diagram and text) in the Council's HDM Team consultation response of 14/10/24[CD 4.14]. These documents were highlighted to give an indication of the design requirements for passing places on single-track rural roads, and are still considered to provide useful guidance on these matters.

4.35 Based on the TAL 2/04 and TRRL Advice Note TSN29 guidance, I consider that well designed passing places should include the following:

- Provide a carriageway width of 5.5m (plus margins on both sides);
- Ideally be spaced (centre to centre) at 60m apart for traffic flows up to 300vph;
- Include suitable tapers (the above guidance suggests 1:2 tapers that are 5.5m long) to allow for manoeuvring in and out.
- Accommodate multiple or longer vehicles (e.g. 11-16.5m long that would allow either 2-3 car lengths or an agricultural vehicle with trailer); and
- Most importantly to have adequate inter-visibility between the passing places.

4.36 To confirm that the above guidance remains valid, I have also taken reference from 'Technical Standard - Roads (Appendix C) - HS2 rural road design criteria' [CD 7.22], which recommends the following:

C.6.7	Inter-visible passing places must be provided on single-track roads at a maximum spacing of 200 metres.
C.6.8	The combined width of single-track road plus passing bay shall be 5.5 metres over a length of 5 metres (or 15 metres where likely to be used by buses or heavy goods vehicles). 5 metre long tapers shall be provided at each end.
C.6.9	The carriageway width across overbridges and through underbridges on single-track roads shall be 5.5 metres, using road markings to give a centred 3.5 metre running lane to discourage a sudden increase in traffic speed or unsafe overtaking manoeuvres. Inter-visible passing places shall be provided at each end of the structure.

4.37 Based on the above HS2 standard, the suggested geometry for passing places is in general accordance with the guidance previously quoted by the LPA. However, a suggested maximum spacing of passing places of 200m is quoted (but for guidance purposes only). I do not support this in the context of Stone Wood Lane, and I assume this separation distance has only been quoted to enable the guidance to be applied in a wide range of situations (e.g. in very lightly trafficked roads, such as farm tracks with minimal usage).

4.38 I note that except for the existing passing place around Ch. 140 / PP-A, there are no other passing places along the most constrained sections of Stone Wood Lane (e.g. between Ch. 0 and Ch. 800) that comply with what I consider to be a well-designed passing place (e.g. in terms of the width, length and tapers) as I have set out above.

4.39 Whilst I consider a 60m separation distance between passing places is desirable, to enable the passing places to operate safely and efficiently, I accept that this distance is not a rigid design requirement that must be applied in all cases. In lower traffic flow situations (e.g. less than 300vph), a greater separation distance can work adequately, subject to the passing places having good levels of inter-visibility and otherwise conforming to good design principles, which I have highlighted is not the case in a number of key locations.

4.40 Whilst achieving a minimum spacing of passing places at 60m intervals is not necessarily essential, long sections of single-track road between passing places (e.g. on the hill between Ch. 556 / PP-I and Ch. 706 / PP-J, where the carriageway is below 4.8m width) exacerbate the highway safely and operational issues I have previously outlined, as the required reversing distances increase accordingly. These reversing distances also increase further when multiple vehicles (or larger vehicles) are involved, due to the sub-standard geometry at many of the passing places on Stone Wood Lane, which cannot accommodate all types (or multiple) vehicles. This results in drivers having to reverse even further to the preceding passing place(s) to allow passing to occur, increasing the highway safety risk and delay to waiting active travel users.

4.41 Therefore, whilst I accept that longer separation distances between passing place can work adequately under certain conditions (e.g. when they are well designed and have good inter-visibility), this is not the case for Stone Wood Lane, where the existing deficiencies with the passing places already contribute towards highway safety risks, and cause operational problems on a regular basis, with the AM peak period being my greatest concern, as this would coincide with children going to school, should their parents be willing to let them walk along this route.

Carriageway Widths and Speeds

4.42 For the vast majority of Stone Wood Lane between the development site and Shepley (a 1.05km length), the carriageway width is below 5.5m. This is except for the limited wider passing places available around Ch. 130-150 / PP-A (approximately 20m) and Ch. 776-828 / PP-J (approximately 52m).

4.43 Due to the lack of footways along the entire route, the road operates as a shared surface highway. Based on the guidance contained in the Kirklees Highway Design Guide SPD [CD 6.6 – Table 1], a carriageway width of 5.5m is required for new shared surface roads, plus hard margins (0.6m wide) on both sides, to take account of vehicle overhang / edge shyness etc. This carriageway width allows 2m wide cars to pass, with a clearance of 0.5m between the cars and on each side of the carriageway (a similar 0.5m horizontal clearance is also recommended in 'LTN 1/20 – Cycle Infrastructure Design' [CD 7.18 – Table 5-3] for cycle clearances to vertical objects above 0.6m e.g. walls, fences and vegetation). The 5.5m carriageway width allows larger vehicles to pass, with a reduced level of clearance (e.g. based on two 2.4m wide vans passing, the available width between vehicles and each edge of carriageway would reduce to approximately 0.2m if it were split evenly), which is acceptable if traffic speeds are relatively low (e.g. a 15-20mph design speeds are identified in the Kirklees Highway Design Guide SPD, for both shared surface roads or higher order Type B streets of the same width). It is noted that the vehicle widths I have mentioned have been taken from Manual for Streets 1 (MfS1) [CD 7.3], as shown on Figure 6.18 extracted below. However, given that MfS was produced in 2007, and private car widths have increased since this time, the clearance widths I have identified will now be lower.

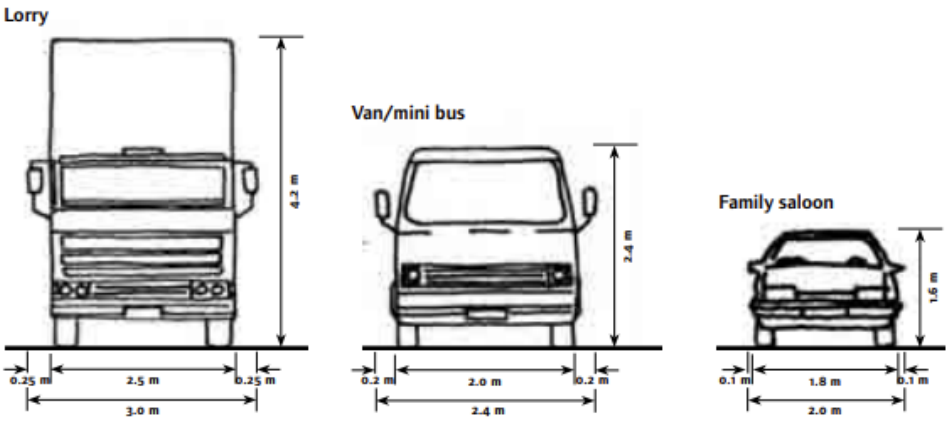

Figure 6.18 Private and commercial motor-vehicles – typical dimensions.

4.44 Based on the above, the majority of Stone Wood Lane along the two-way sections (including passing places) is of insufficient width (e.g. below 5.5m) to allow two light vehicles to pass comfortably, even at the low speeds (e.g. below 20mph). Therefore, I do not accept the assertion that traffic speeds on Stone Wood Lane are low, as suggested by the Appellant, with the recorded 85th percentile speeds along the entire route being consistently above a suitable speed (e.g. 20mph) for this width of shared surface road, with the occasional driver travelling well in excess of this (e.g. a speed of 50-55mph has been recorded for a driver travelling down the hill through the single-track section through stone Wood close to PP-J).

4.45 The Appellant has suggested that a 4.8m carriageway width is adequate to allow a car to pass a van, and a 4.1m width is sufficient for two cars to pass. They have based this assumption on the dimensions shown on Figure 7.1 of MfS1[CD 7.3], which is extracted below:

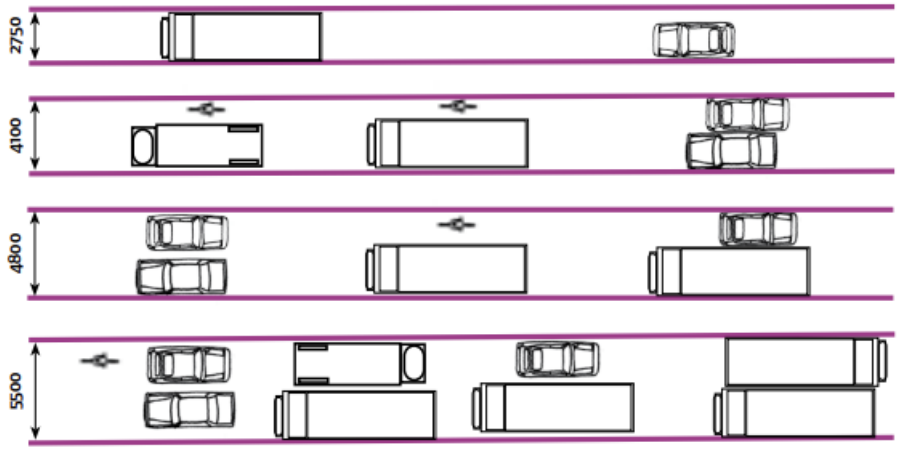

Figure 7.1 Illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.

4.46 I accept that a 4.8m wide carriageway can allow a car and van to pass at low speed (e.g. less than 20mph), but the level of clearances I have previously identified would be significantly reduced (e.g. based on a 2.4m wide van, passing a 2m wide car, the available width between the passing vehicles and each edge of carriageway would be approximately 0.15m if split evenly). Therefore, this narrower width would involve closer passing of vehicles, increasing the risk of collisions between passing traffic (e.g. clashing wing mirrors etc.). This also doesn't take account of the edge treatment at the side road, which requires additional clearances (e.g. a safe distance would be 0.5m to a boundary wall, fence or other vertical obstruction, as previously mentioned).

4.47 However, I do not accept that a 4.1m carriageway width is adequate to allow two cars to safely pass, as this would only provide 33mm clearance (if evenly split 3 ways) between vehicles and each edge of carriageway, which is clearly inadequate at any speed. It is also noted that Figure 7.1 from MfS [CD 7.3] states that the identified widths are not recommendations. Whilst I acknowledge that smaller cars may be able to physically pass at this narrow 4.1m carriageway width (and this does occur on Stone Wood Lane at the very narrowest of the passing places that exist), this is not a safe or comfortable width for vehicles to pass, and is likely to result in low speed collisions with passing traffic or adjacent boundary features (an issue I have experienced myself when using the route, where I have scraped my vehicle on vegetation when passing at one of the very narrow informal passing places / PP-F).

4.48 To demonstrate this, the following image (Photo 6), looking southeast from around Ch. 540 / PP-I towards the informal passing place at Ch. 485 / PP-H (just south of the bend exiting Stone Wood on the Shepley side) that the Appellant proposes to 'improve' with a 4.2m wide passing place (which is also less than 5m long, so is unusable by larger cars) was taken during one of my recent site visits. These vehicles were both 'super-mini' type vehicles (e.g. Renault Clio), and they struggled to pass even at crawling speed, and took some time to do so.

Photo 6 - Looking southeast from around Ch. 540 towards Ch. 485

4.49 As can be seen from Photo 6, even with these small cars, there was minimal space for these vehicles to pass, and this location is unsuitable for larger cars / vans. It is also noted that the next available passing place cannot be seen on Photo 6, due to the crest of the hill, so there is inadequate forward visibility between the passing places that can accommodate larger vehicles (e.g. the next available informal passing place in the Shepley direction is around Ch. 450 / PP-G).

4.50 The Appellant has also suggested that a 4.1m wide carriageway is adequate for a vehicle to pass a horse rider. Whilst this may be physically possible, it would not be a safe width to pass a horse. This is confirmed in the Highway Code - Rule 215 (see extract below), which recommends that horses should be passed with 2m clearance, and at a slow speed of a maximum of 10mph. This distance is also similar to the minimum offset distance required in the Design Manual for Roads and Bridges (DMRB)[CD 7.21] 'CD143 - Designing for walking, cycling and horse-riding', which recommends a minimum width of 1.8m (paragraph 5.16.6) between the edge of a traffic lane and an equestrian route. Based on the absolute minimum width required for a horse of 1m (e.g. Bridleways must be a minimum of 2m wide, and DMRB CD143 Table 5.16 requires equestrian routes to be between 2-3m, for single and two-way riding respectively), the recommended safe passing clearance of 2m, and a car width of 2m, this requires a carriageway width of 5m (or 4.8m, if the reduced 1.8m clearance is utilised from DMRB). Therefore, it is clear that it is not safe for a car to pass a horse in a carriageway width at 4.1m and at least 4.8m carriageway width (plus 0.5m wide margins) is required, even when travelling at a low speed (10mph).

Rule 215

Horse riders and horse-drawn vehicles. Be particularly careful of horse riders and horse-drawn vehicles especially when approaching, overtaking, passing or moving away. Always pass wide and slowly. When you see a horse on a road, you should slow down to a maximum of 10 mph. Be patient, do not sound your horn or rev your engine. When safe to do so, pass wide and slow, allowing at least 2 metres of space.

Feral or semi feral ponies found in areas such as the New Forest, Exmoor and Dartmoor require the same consideration as ridden horses when approaching or passing.

Horse riders are often children, so take extra care and remember riders may ride in double file when escorting a young or inexperienced horse or rider. Look out for horse riders' and horse drivers' signals and heed a request to slow down or stop. Take great care and treat all horses as a potential hazard; they can be unpredictable, despite the efforts of their rider/driver. Remember there are three brains at work when you pass a horse; the rider's, the driver's and the horse's. Do not forget horses are flight animals and can move incredibly quickly if startled.

4.51 Therefore, this demonstrates that there are highway safety risks associated with vehicles passing horse riders along the vast majority of the Stone Wood Lane, as the majority of existing informal passing places (that are to be hard paved, but not widened to the minimum required width of 4.8m + 0.5m margins, due to highway boundary constraints) are still too narrow for a horse to be passed with any degree of comfort. This problem is exacerbated by the restricted forward visibility along Stone Wood Lane, as drivers cannot see far enough ahead to slow to the recommended maximum safe passing speed of 10mph along much of the route.

4.52 There are other long sections of single-track width that lie between the range of 3.2 - 3.9m, including on the steep section through Stone Wood between Ch. 564 / PP-I to Ch. 695 / PP-J (an approximate length of 130m). This width is identified in LTN 1/20 'Cycle Infrastructure Design' [CD 7.18] at Chapter 7, which relates to 'Quiet mixed traffic streets and lanes', as being a critical highway safety issue, stating at paragraph 7.2.10 *'…widths between 3.2m and 3.9m may encourage close overtaking by motor traffic at pinch points and should not be used'*.

4.53 This LTN 1/20 guidance is based on providing a minimum safe overtaking clearance of 1m, the 1m kinetic envelope of a cyclist (See Figure 5.1 of LTN 1/20) and a cars width of 2.0m, to achieve the minimum lane width of 4.0m (plus 0.5m wide margins) that LTN 1/20 advises is required for safe overtaking of cyclists.

4.54 The LTN 1/20 guidance is based on traffic speeds of up to 20mph, which they consider to be low speeds, and the maximum upper limit for cyclists to feel comfortable in mixed traffic. This is confirmed at paragraph 7.1.1 of LTN 1/20, which states:

> *'7.1.1 Where motor traffic flows are light and speeds are low, cyclists are likely to be able to cycle on-carriageway in mixed traffic, as shown in Figure 4.1. Most people, especially with younger children, will not feel comfortable on-carriageways with more than 2,500 vehicles per day and speeds of more than 20 mph. These values should be regarded as desirable upper limits for inclusive cycling within the carriageway'.*

4.55 I consider that the above guidance is equally applicable to pedestrians walking in the carriageway, as the minimum width for very short sections of footway identified

in DfT document ‘Inclusive Mobility’ [CD7.19 Section 4.2, first paragraph] is 1m (e.g. the same width as the dynamic kinetic envelope of a cyclist).

4.56 Therefore, based on the above advice, there is inadequate width for a driver to safely pass a pedestrian or cyclist along many of the single-track sections along the route, including the steep hill section through Stone Wood between Ch. 564 / PP-I to Ch. 695 / PP-J.

4.57 I have experienced issues myself when walking along this section during a recent site visit. When I was walking down the hill (around Ch. 600), I observed 3 cars meeting on this steep single-track section (where frequent conflicts occur due to the lack of inter-visibility between passing places, as previously discussed) as can be seen on the image below (Photo 7 looking downhill to the west). Fortunately, the vehicle travelling uphill yielded, and reversed down the hill away from me (towards PP-J), otherwise I would have been stood in a highly vulnerable location (standing in the narrow verge that is mainly mud/leaf litter), had the vehicles attempted to reverse up the hill in my direction, in this section of road that is only circa 3.3m wide. These concerns are compounded due to the high banking / walls on both sides, which prevent any means of escape for a pedestrians should a vehicle reverse in their direction, potentially resulting in a severe incident due to crush type injuries.

Photo 7 - Looking downhill to the west from around Ch.600

Other issues

4.58 Stone Wood Lane also has long sections of single-track width that reduce as low as 2.6m, including a circa 120m long single-track section at the Shepley end (e.g. around Ch. 70). Pedestrians are at risk of a collision from a passing vehicle along this (and other) sections of Stone Wood Lane due to the narrow width, which in this case has little if any verge to step aside onto. There is also restricted forward visibility on approach to this section from the Shepley direction, as the road bends to the right, as can be seen from Photo 8 (taken from around Ch. 0 looking northwest toward the start of Stone Wood Lane).

Photo 8 - Looking toward Stone Wood Lane from Jos Lane around Ch. 0

4.59 When I have walked along this long (120m) narrow single-track section of Stone Wood Lane on numerous occasions, I have felt obliged to rush, to reduce the risk of a vehicle passing me. During one of my visits, I was walking in the Shepley direction when a car approached me from behind. I was aware of their presence, and rushed to try and exit the route, but the car continued toward me and did not slow significantly, forcing me to quickly stand in the very narrow verge and brambles on the south side, to allow them to pass. This was uncomfortable due to the narrow width and close passing of the vehicle, and somewhat intimidating. Had I been a more vulnerable road user (e.g. a parent accompanying a child), this would have been more concerning. Local residents have also highlighted similar issues, with comments made that when they walk their dog along the narrow sections, they pick them up as it is not safe for them to be passed.

4.60 The Appellant has suggested that pedestrians have the 'opportunity' to shelter within verges when being passed by traffic. However, as I have highlighted, there are locations where there are no verges (or they are very narrow), where they are over-grown, and many that are not a safe place to stand and wait (e.g. on the hill through Stone Wood). There are also virtually no verges of sufficient width (e.g. a minimum of 1m) along the route that are adequate for a pedestrian to stand comfortable (particularly an adult accompanying a child, or a dog walker etc).

4.61 Manual for Street (MfS) [CD 7.3] provides a summary of research regarding the maximum acceptable vehicle flow on a shared surface road, as shown on the extract below taken from page 83 (also see paragraph 7.2.14 of MfS):

Research on shared space streets

A study of public transport in London Borough Pedestrian Priority Areas (PPAs) undertaken by TRL for the Bus Priority Team at Transport for London concluded that there is a self-limiting factor on pedestrians sharing space with motorists, of around 100 vph. Above this, pedestrians treat the general path taken by motor vehicles as a 'road' to be crossed rather than as a space to occupy. The speed of vehicles also had a strong influence on how pedestrians used the shared area. Although this research project concentrated on PPAs, it is reasonable to assume that these factors are relevant to other shared space schemes.

The relationship between visibility, highway width and driver speed identified on links was also found to apply at junctions. A full description of the research findings is available in Manual for Streets: redefining residential street design.[3]

4.62 As can be seen from the above, the recommended threshold for shared surface roads is 100 vehicles per hour (vph). Above this level, the research suggests that drivers dominate the space, rather than the pedestrians (and other active travel users). Whilst traffic flows on Stone Wood Lane are currently just below this level (90 vehicles were recorded during the AM peak period, during one of the ATC surveys), based on my experience of using the road, it already feels like vehicles dominate the space when drivers encounter a pedestrian, with them failing to yield for me, even though I had very limited options to get off the carriageway (e.g. on the long narrow section around Ch. 70). This 100vph threshold is also utilised in the Kirklees Highway Design Guide SPD [CD 6.6 – See Table 1 for Type C streets], as the maximum permitted flow for a shared surface road (although we typically discourage shared surface roads in new developments, with flows anywhere near this upper limit). Therefore, contrary to what is suggested by the Appellant, the current traffic flows on Stone Wood Lane are not low given its context as a shared

surface road. On the contrary, they are currently close to what is usually accepted as the maximum acceptable flow for a shared surface road.

4.63 Finally, it is noted that Stone Wood Lane is unlit. Whilst, this may not be a significant issue for drivers (and may be beneficial in some cases, as it allows them to see an oncoming vehicle at night), this exacerbates the safety risks for active travel users who are likely to avoid using the route at night, and who would be very difficult to observe by an approaching driver (even if they wisely used a torch and wore hi-visibility clothing), and would be at significant risk of being hit by a passing vehicle, particularly on the single-track sections where there is restricted forward visibility as I have identified.

Summary

4.64 In summary, the existing physical constraints and operational issues I have identified, give rise to highway safety concerns for all users, but are most problematic for active travel users, who are at risk from passing traffic, and in particular from reversing vehicles, which occurs frequently during network peak periods, due to the sub-standard passing place provision. These reversing manoeuvres, which are often over long distances and involve multiple vehicles, compound the highway safety risks, and are also difficult for drivers due to the physical constraints along the route.

4.65 Of greatest concern is the long section of single-track road on the hill through Stone Wood (between PP-I & PP-J), which lacks inter-visibility between passing places, has sub-standard forward visibility at the top of the hill at the bend where the road transitions between single-track and two-way. This single-track section also lacks suitable verges where pedestrians can safely wait to allow traffic to pass. Problems occur on this single-track-section on a regular basis, where vehicles frequently come into conflict. This results in long and hazardous reversing manoeuvres, which are of most concern to waiting pedestrian who are at risk of being struck by these vehicles. This section of Stone Wood Lane is beyond the scope of the mitigation works proposed by the Appellant, and so the existing problems in the area, and many other sections along the wider route, will be exacerbated by additional development traffic and are not adequately mitigated.

5. Other Key Issues

Development Proposals

5.1 As confirmed in the Council's Highway Development Management (HDM) consultation responses [CD 4.14 & 4.16] provided during the planning application consultation period, whilst the principle of the site layout was acceptable, the street layout had not been designed in full accordance with the Council's Highway Design Guide SPD, and as such, was not suitable for adoption in its current form. This remains the case. However, highway adoption is not a mandatory requirement of the planning process, and the LPA did not cite this as reasons for refusal, as the streets could remain private should the Appeal be allowed. However, as final details of the street layout had not been agreed, a suitably worded planning condition would be necessary, to ensure that the site layout is designed to a commensurate standard to an adoptable street (e.g. that it is safe and suitable for all users, but not necessarily complying with all layout requirements for an adoptable street) and that a Stage 1 Road Safety Audit needs to be carried out. A condition would also be required to agree the waste collection arrangements for the Appeal site, as the Council's Waste Teams will not routinely enter private streets without prior agreement. It is understood that the Appellant is in agreement on these matters, and this will be confirmed in the Statement of Common Ground once this has been finalised.

5.2 The revised site access arrangements (shown on drawing 24071-LE-00-ZZ-DR-D-0001-P4) [CD 1.34] included in the Transport Assessment Addendum report addressed the main outstanding issues raised in relation to the site access. Therefore, it was confirmed in the final HDM consultation response of 11/04/25 [CD 4.16] that there was no objection to the principle of the proposed site access, and that any further changes that may be required, including any changes that may arise from the required Stage 1 Road Safety Audit process in due course, could be addressed via a suitably worded planning condition. This remains the case and it is understood that the Appellant is in agreement of this matter, and this will also be confirmed in the Statement of Common Ground once this has been finalised.

Construction Access

5.3 Construction access to the Site would be required from Shepley Road, with all HGV movements prohibited from utilising Stone Wood Lane to the east, and during the construction phase, a Construction Management Plan (CMP) will be required that will need to address / mitigate any potential impacts arising from the development, and ensure that the Site operates efficiently and safely. The CMP would need to be secured by a suitably worded planning condition, and it is understood that this will be confirmed in the Statement of Common Ground once this has been finalised.

5.4 A planning condition would also be required for pre and post construction highway conditions surveys and remediation, to ensure that any damage caused to the highway that is associated with construction activities at the Appeal site is rectified, which would need to be secured by a suitably worded planning condition. This is a standard LPA requirement, and it is not expected that this matter will be in dispute.

Agreed 'Sensitivity Test' Trip Rates and Future Assessment Scenario

5.5 In the pre-application advice letter from the LPA [CD 5.6], it was confirmed that a Transport Assessment or Statement was required to support the planning submission, and that the scope of the assessment should be agreed in advance with the Council's Highway Development Management (HDM) Team. This approach is consistent with the National Planning Policy Framework (NPPF), December 2024, and the accompanying Planning Practice Guidance (PPG), relating to Travel Plans, Transport Assessments and Statements.

5.6 The planning application was validated on 10/05/24 and was supported by a Transport Assessment [CD 1.23] and Travel Plan [CD 1.24] produced by AMA (the Appellant's first transport consultant). However, the scope of these reports, including the development trip generation assessment and distribution, had not been discussed or agreed in advance of their submission with HDM, contrary to the pre-application advice.

5.7 HDM then reviewed the supporting information, including the Transport Assessment and Travel Plan, and provided a consultation response dated

14/10/24 [CD 4.14]. In this response, HDM raised concerns regarding the traffic assessment methodology, including the approach to the development's vehicle trip generation and distribution assessments.

5.8 Following the HDM Consultation response, the Appellant appointed a new (second) transport consultant (TPS) to respond to the issues raised by HDM, including the concerns relating to the traffic assessment methodology that had been used in the original Transport Assessment. A number of meetings and discussions were held between the new transport consultant and HDM, which culminated in the production of a new Transport Assessment Addendum [CD 1.33]. As part of the discussions that took place in advance of the Transport Assessment Addendum being prepared, it was agreed between both parties that a 'Sensitivity Test' of traffic impact was undertaken in the new assessment, to ensure that a robust assessment of the developments impact on Stone Wood Lane was undertaken (as this was the key area of concern in terms of traffic impact). The Transport Assessment Addendum report confirmed at paragraph 4.5 the rationale for using the 'Sensitivity Test' assessment was:

> *'In order to provide a robust assessment, taking into account the likely low levels of walking and cycling….'.*

5.9 The 'Sensitivity Test' trip rate utilised within the Transport Assessment Addendum was based on a robust two-way weekday peak hour vehicle trip rate of 0.7 trips per dwelling, for both the AM and PM weekday peak hour periods, and equated to 35 two-way vehicle trips based on the 50 dwellings proposed. The Transport Assessment Addendum then estimated that up to 16 (47%) and 19 (53%) two-way vehicle trips in the weekday AM peak and PM peak hour periods respectively, could be generated on Stone Wood Lane (see paragraphs 4.11 - 4.13 of the Transport Assessment Addendum [CD 1.33]).

5.10 HDM reviewed the Transport Assessment Addendum report and provided the consultation response dated 11/04/25 [CD 4.16]. In this response, HDM continued to raise concerns regarding the traffic distribution methodology (which had been revised by the Appellant's consultant since the original Transport Assessment, using a different methodology). In particular, the assumption made in the Transport Assessment Addendum that no primary school children living at the development

site would attend schools to the east and travel to school via Stone Wood Lane (e.g. those attending Shepley First School) was not accepted. However, the HDM consultation response concluded that the level of weekday peak hour vehicle trips identified in the Transport Assessment Addendum (based on the agreed 'Sensitivity Test' trip rates that had been agreed by both parties in advance), which had been estimated by the Appellant's consultant to utilise Stone Wood Lane were reasonable, with the HDM consultation response summarising by stating:

> *'… it is accepted that the development may increase vehicle trips on Stone Wood Lane by approximately 19 two-way trips during peak hour periods.'*

5.11 As part of the Appellant's H&T SoC document [CD 8.2], a completely new assessment of development traffic generation and distribution has been undertaken, by a new (third) transport consultant (Optima). As with the previous Transport Assessment (and elements of the subsequent Transport Assessment Addendum), the scope of this new assessment has not been agreed with the LPA in advance of the Appeal. This is particularly problematic in this situation, given the complex nature of the new assessment that has been used by the Appellant's consultant, which includes numerous assumptions that have not been discussed or agreed previously. This approach is contrary to paragraph 116 of the National Planning Policy Framework, December 2024 (NPPF), which states that *'all reasonable future scenarios'* should be taken into account, which the NPPF glossary defines as:

> *'Reasonable future scenarios (for assessing potential highways impacts): a range of realistic transport scenarios tested* ***in agreement with the local planning authority*** **[Bold added for emphasis]** *and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.'*

5.12 It is understood that the new assessment methodology has been proposed by the Appellant's new transport consultant, as they believe that the *'Council's methodology in arriving at 16 to 19 development trips on Stone Wood Lane is*

incorrect and flawed', as they have stated at paragraph 5.7.4 of the H&T SoC document [CD 8.2].

5.13 It is reiterated that the previous assessment methodology was not based on the 'Council's methodology'. On the contrary, this assessment was the 'Sensitivity Test' that the Appellant's previous (second) consultant had proposed (based on the 'Sensitivity Test' trip rates that had been agreed in advance with HDM), and their own assessment of traffic distribution, with the Appellant's transport consultant clearly believing at the time that it was a 'reasonable future scenario' to form the basis of assessment of development traffic impact on Stone Wood Lane. Therefore, the statement at paragraph 5.7.4 of the Appellant's H&T SoC document [CD 8.2] is inaccurate.

5.14 It is also reiterated that HDM did not agree with the assessment methodology used to derive the traffic distribution in the 'Sensitivity Test' assessment contained with the Transport Assessment Addendum report [CD 1.33]. Instead, HDM confirmed that it was accepted as being a reasonable assessment scenario for considering the proportion of weekday peak hour development traffic that may use Stone Wood Lane (e.g. the 47% and 53% during the weekday AM and PM peak hour periods respectively, as identified in the Transport Assessment Addendum). Therefore, this previously accepted and reasonable future traffic distribution scenario, which was utilised by both the Council and the Appellant in the assessment of development traffic impact along Stone Wood Lane should continue to be utilised. However, for simplicity, the LPA have suggested [CD 8.4 and below] that a 50% figure should be used for both peak periods as part of this Appeal.

5.15 In the Appellant's H&T SoC document, the use of the 0.7 two-way 'Sensitivity Test' trip rate has been questioned, stating at paragraph 5.4.4:

> *'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 have considered in the April 2025 consultation response. It is unclear where the 0.7 value has come from, but it appears to be unjustified and not supported with any evidence. It should therefore not be used.*'

5.16 To put the 'Sensitivity Test' trip rate into context, as it was not fully explained in the Appellant's Transport Assessment Addendum report [CD 1.33], and as this appears to have confused the new (third) transport consultant when preparing the H&T SoC document [CD 8.2], the 'Sensitivity Test' trip rate was a trip rate that HDM had advised the Appellant's consultant to utilise given the Appeal sites relatively low level of accessibility. This 'Sensitivity Test' trip rate was considered reasonable, as it was also being used at the same time for a nearby residential development proposal at Storthes Hall (Planning Application reference 2023/93667) as their baseline trip rate (e.g. prior to taking into account any Travel Plan measures that may reduce the vehicle trip rate), and the use of the same vehicle trip rate was considered to provide a robust approach for the Stocksmoor site, and to ensure consistency of assessments of developments sites in the local area. The use of this 'Sensitivity Test' trip rate was suggested by HDM as both development sites had similar accessibility characteristics, including their proximity to no significant amenities within easy walking distance of the sites, and as the Storthes Hall site is located within close proximity to the Appeal site (it is located circa 2km to the north and within the same MSOA areas as the Stocksmoor site).

5.17 The outline planning application for the Storthes Hall residential development site has subsequently been approved. As part of the final submission for this planning application, a Transport Assessment Addendum (TAA) report dated 13/12/24 was produced (by the same transport consultants that are now acting for the Appellant at the Appeal), which included the final vehicle trip rate that was ultimately agreed for that development, with the relevant extracts from the Storthes Hall TAA showing the agreed trip rates included at **Appendix C** (and previously included in the LPAs Statement of Case – Technical Response report [CD8.4 & 8.7]). As can be seen from the Storthes Hall TAA report extract, a reduced vehicle trip rate of 0.630 two-way weekday peak hour trips was ultimately agreed for that development, which was set out in Table 3.1 of the Storthes Hall TAA report. The reduced two-way vehicle trip rate of 0.630 was agreed, as it included a 10% reduction from the 0.7 two-way trip rate (e.g. a Vision-led approach), as the applicant for that site had agreed to provide a financial contribution of £1,000,000 (to be paid in £200,000 instalments over 5 years) to enable a new bespoke bus

service to be provided through the Storthes Hall site, ensuring that the site was accessible by public transport. The development also agreed to provide a Sustainable Transport Fund (STF) to enable all dwellings to be provided with either an annual Residential MCard bus pass, or another sustainable transport measure of the same value.

5.18 It is understood that the Appellant is prepared to agree to provide a similar Sustainable Transport Fund (STF) for their development (to the current value of the Residential MCard bus and rail zone 2-5 pass), as part of their package of Travel Plan measures, which it is understood will be confirmed in the Statement of Common Ground and S106 Agreement once they are both finalised. Therefore, it is now reasonable for a similarly reduced 'Sensitivity Test' trip rate of 0.630 to be utilised for the Stocksmoor site, as both developments sites will have similar levels of accessibility by public transport following the agreed mitigation and Travel Plan measures; albeit the Storthes Hall site may still have slightly better public transport accessibility given the bespoke nature of the new bus service improvement that has been secured for that development.

5.19 Based on this reduced 'Sensitivity Test' trip rate, which takes account of the Appellant's agreement to provide a Sustainable Transport Fund (STF) to support a package of Travel Plan measures, the Appeal site is estimated to generate a total of 32 two-way vehicle trips in both the AM and PM weekday peak hour periods (e.g. 50 dwellings multiplied by the reduced 'Sensitivity Test' trip rate of 0.630).

5.20 Based on 50% of development traffic utilising Stone Wood Lane (e.g. the 50% traffic distribution that the LPA now recommends is used for simplicity, as stated above, rather than the 47% and 53% assumed for the weekday AM and PM peak hour periods respectively, which was the traffic distribution identified by the Appellant's previous consultant in their Transport Assessment Addendum [CD 1.33 paragraphs 4.11 – 4.13], the Appeal site is estimated to generate 16 two-way vehicle trips in both the AM and PM weekday peak hour periods on Stone Wood Lane.

5.21 In summary, the LPA does not accept the Appellant's rejection of the use of a 'Sensitivity Test' trip rate, which had been utilised to ensure a robust assessment of development traffic impact on Stone Wood Lane. The use of a 'Sensitivity Test'

trip rate was agreed in advance with the Appellant's previous (second) transport consultant prior to their completion of the Transport Assessment Addendum report, which is in accordance with the NPPF that states that 'all reasonable future scenarios' should be agreed in advance with the LPA. The LPA also rejects the Appellant's assertion in their H&T SoC document [CD 8.2] that the traffic distribution methodology used in the 'Sensitivity Test' assessment was the 'Councils methodology', as the traffic distribution was a proposed scenario suggested by the Appellant's consultant in their Transport Assessment Addendum [CD 1.33]. Whilst this traffic distribution methodology was not fully accepted by the LPA, it was agreed to form a reasonable basis for assessment as identified in the final HDM consultation response. Notwithstanding that the previous 'Sensitivity Test' assessment had been agreed as a 'reasonable future scenario' between both parties, the LPA recommend that an adjusted version of the 'Sensitivity Test' assessment is considered as part of the Appeal, as set out above. This takes into account a 10% reduction to the previously agreed 'Sensitivity Test' trip rate (as the Appellant is understood to have committed to provide a Sustainable Transport Fund to support Travel Plan measures at the Appeal site) and a simplified assessment of traffic distribution that assumes 50% of development traffic uses Stone Wood Lane (rather than 47% and 53% in the AM and PM weekday network peaks respectively, as had been proposed by the Appellant's consultant in the Transport Assessment Addendum [CD 1.33] paragraphs 4.11 – 4.13).

5.22 Based on the adjusted version of the 'Sensitivity Test' assessment, the LPA estimate that the Appeal site would generate a total of 32 two-way vehicle trips in both the AM and PM weekday peak hour periods, of which 50% may use Stone Wood Lane, which equates to 16 two-way vehicle trips along this route. This realistic future scenario takes account of the Appeal sites relatively low level of accessibility, the Travel Plan measures now proposed, is consistent with the trip rates agreed for a nearby development site at Storthes Hall, and is based on a methodology previously proposed by the Appellant's consultant in their Transport Assessment Addendum [CD 1.33] and subsequently agreed by the LPA as forming a reasonable basis for assessment. Therefore, this adjusted 'Sensitivity Test' assessment is in accordance with the requirements of the NPPF, which requires that 'all reasonable future scenarios' be taken into account.

The Appellant's new trip rate, traffic generation and traffic distribution assessment

5.23 As part of the Appellant's H&T SoC document, a completely new assessment of development traffic generation and distribution has been undertaken (the scope of which had not been previously discussed or agreed with the LPA, contrary to the NPPF guidance). The Appellant's new assessment concludes at paragraph 5.7.2 of the H&T SoC document by stating:

> *'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 25% of the total 28 vehicle movements predicted (see Table 5.4), which is considered to be robust taking account of each journey purpose and some of the worst-case assumptions applied.'*

5.24 The LPA does not accept that the new assessment provides a robust basis for assessment or that it is based on worst-case assumptions.

5.25 The new development traffic generation assessment included in the Appellant's H&T SoC document [CD 8.2], has been calculated using data from the TRICS database. The new assessment identified two-way vehicle trip rates of 0.555 and 0.559 per dwelling, in the AM and PM weekday network peak hour periods respectively, as shown in their Table 5.3. This is the third such TRICS assessment that the Appellant's (three) transport consultant's have now undertaken (for the Transport Assessment [CD 1.23], Transport Assessment Addendum [CD 1.33] and now for the Appellant's H&T SoC document), all of which have incrementally increased the development's vehicle trip rate. However, none of these TRICS assessments have adequately taken into account the development site's relatively low level of accessibility and are not considered to provide a robust basis for assessment.

5.26 For the new TRICS assessment that is now being relied upon by the Appellant, the TRICS search parameters are set out at paragraph 5.4.1 of the H&T SoC document [CD 8.2]. Whilst it is helpful that the search parameters have now been identified in the new document (which had not been the case for the previous assessments, contrary to good practice), no justification has been provided why these TRICS search parameters are considered to be reflective of the Appeal site, and appear to be generalised trip rates that could be applied to any housing

development below 500 dwellings located in a suburban area (e.g. the two main TRICS search parameters that have been used). As such, the derived trip rates are not reflective of the nature of the Appeal site, which is in a somewhat isolated location away from the wider suburban area, has a relatively low level of accessibility and is not within easy walking distance of any significant local amenities that serve the day to day needs of residents. Therefore, it is not accepted that these trip rates provide a robust basis for assessment as has been suggested by the Appellant and are generic trip rates that do not reflect the Appeal site.

5.27 To put this issue into context, *'Method of Travel to Work'* data from the 2011 Census for MSOA Kirklees 051 & 56 has been obtained, which is the same datasets that have been utilised by the Appellant later in their new traffic distribution assessment (See further comments below relating to the new traffic distribution methodology that the Appellant now proposes). The 'Method of Travel to Works' data has been shown individually for each MSOA and in a combined dataset, as well as a comparison with the wider Kirklees area, as shown in Table 2 below (in accordance with normal practice, this excludes those not in employment and who work from home from the dataset, as they are not travelling to work):

Table 2
Method of Travel to Work (excluding 'Not in employment' and Work mainly at or from home')
2011 Census Data - QS701EW Dataset

Method of Travel to Work	E02002321: Kirklees 051		E02002326: Kirklees 056		Combined Kirklees 051&056		Kirklees	
Underground, metro, light rail, tram	5	0.2%	0	0.0%	5	0.1%	155	0.1%
Train	88	2.7%	92	3.1%	180	2.9%	5,421	2.9%
Bus, minibus or coach	220	6.8%	95	3.2%	315	5.1%	15,134	8.2%
Taxi	17	0.5%	7	0.2%	24	0.4%	1,727	0.9%
Motorcycle, scooter or moped	23	0.7%	20	0.7%	43	0.7%	1,280	0.7%
Driving a car or van	2,438	75.4%	2,466	82.8%	4,904	78.9%	125,678	68.4%
Passenger in a car or van	201	6.2%	133	4.5%	334	5.4%	12,566	6.8%
Bicycle	27	0.8%	20	0.7%	47	0.8%	1,829	1.0%
On foot	202	6.3%	135	4.5%	337	5.4%	19,083	10.4%
Other method of travel to work	11	0.3%	12	0.4%	23	0.4%	960	0.5%
Totals	3,232	100.0%	2,980	100.0%	6,212	100.0%	183,833	100.0%

5.28 As can be seen from the above Table 2, within the combined MSOA that encompasses the Appeal site (and also the aforementioned Storthes Hall site), the car / van driver percentage (78.9%) is significantly higher than the Kirklees average (68.4%) by over 10%. Therefore, this suggests that a higher vehicle trip rate is appropriate for the Stocksmoor site than has been derived by the Appellant's transport consultant's in their various assessments, including the new generic trip rate for a suburban residential development included in their latest assessment.

5.29 Whilst the above 'Method of Travel to Work' data relates to commuter trips, as a high-level assumption, it is reasonable to assume that other trips from the Stocksmoor site could have a similar modal split. This is considered reasonable, as the majority of other trip types such as education, shopping, sport / leisure, holiday / day trips and other personal business trips are likely to be motor-vehicle trips, given the lack of facilities within easy walking distance of the Appeal site.

5.30 If the local car / van driver percentage identified for combined MSOA 51 & 56 in Table 2, are then applied to the weekday AM and PM two-way peak person trip rates identified in Table 4.1 (0.987 and 0.876 two-way person trips in AM and PM peak respectively) of the Appellant's previous Transport Assessment Addendum report [CD 1.33] (their only transport assessment that identified person trips), a vehicle trip rate can be derived. Using this approach, this would equate to two-way vehicle trips rates of 0.779 (0.987 x 78.9%) and 0.691 (0.876 x 78.9%) in the weekday AM and PM network peak periods respectively.

5.31 This demonstrates that the 'Sensitivity Test' trip rate of 0.7 two-way vehicle trips utilised within the Appellant's Transport Assessment Addendum report was a realistic figure to form the basis of the traffic assessment for the Appeal site (notwithstanding that a 10% reduction to this 'Sensitivity Test' trip rate is now accepted by the LPA as described above, on the basis that a robust Travel Plan and associated measures are ultimately provided). This also demonstrates that the Appellant's new trip rate assessment is not robust, and has not been undertaken in accordance with good practice (e.g. a better approach is to first consider all person trips from the development, and then considering how these trips would distribute between all transport modes).

5.32 As part of the Appellant's H&T SoC document, a completely new assessment of development traffic distribution has been undertaken. The Appellant's new traffic distribution assessment is considered to be overly elaborate, unnecessarily complex, disproportionate to the scale of assessment being undertaken, and includes numerous assumptions that are questionable at best and others that appear to be flawed.

5.33 Specific concerns I have identified regarding the various assumptions within the new traffic distribution methodology contained in the Appellant's H&T SoC document [CD 8.2] are set out below.

5.34 Data from TEMPro for Middle Super Output Areas (MSOA) 051 & 056 (See MSOAs on Figure 2 below) has been used to determine vehicle journey purpose for car trips (rather than assessing all mode trip types, which is a better approach) at the Appeal site. This data has been used as Stocksmoor lies on the edge of these two MSOA, which the LPA does not dispute. However, using this data from a wide area, and then applying it to the Appeal site is incorrect, as this assumes that the travel patterns and modal split of people living in Stocksmoor are the same as people living in the remaining areas of MSOA 051 & 056. It is noted this wider area includes the villages of Shepley, Shelley, Kirkburton and Highburton, which all have a range of local facilities, including schools (both primary and secondary), shops, medical facilities etc. that are within easy walking distance. This is not the case for the Appeal site, which is not within easy walking distance of any such facilities, and the most direct walking route to the nearest facilities that accommodate the daily needs of residents is along Stone Wood Lane when walking to Shepley (a walk of over 1km before reaching any local facility). In particular, the data relating to primary education trips will certainly not be the same for the Appeal site as in the wider MSOAs, as it will be easy to walk to a primary schools for a large proportion of people living in the other villages, which will clearly not be the same for the Appeal site, where it is likely that the vast majority of all trips to/from primary school will be by car (or by bike, should parents feel safe to do so). Unfortunately, the TEMPro database cannot be focused in sufficiently to consider only Stocksmoor and surrounding rural areas that are less accessible, to allow more localised journey purpose information to be considered. Had this been the case, using the smaller Lower Super Output Area scale census data (e.g. If it

had been possible to use LSOA 051B – see area on Figure 3 below), could have provided more representative data for trip distribution purposes (and using the data for all trip types). However, TEMPro can only consider the larger MSOA datasets, which in this case incorporate villages with very different travel characteristics to Stocksmoor. As such, the journey purpose data for car trips used by the Appellant are unreliable, and provide a flawed assessment approach, ignoring that during peak hour periods, more people will be travelling by car for other purposes (e.g. taking children to primary school) who live in Stocksmoor. A better approach would have been to determine journey purpose for all trip types during network peak periods, and then applying a reasoned and justifiable modal split to each trip type (e.g. 100% of primary school trips by car).

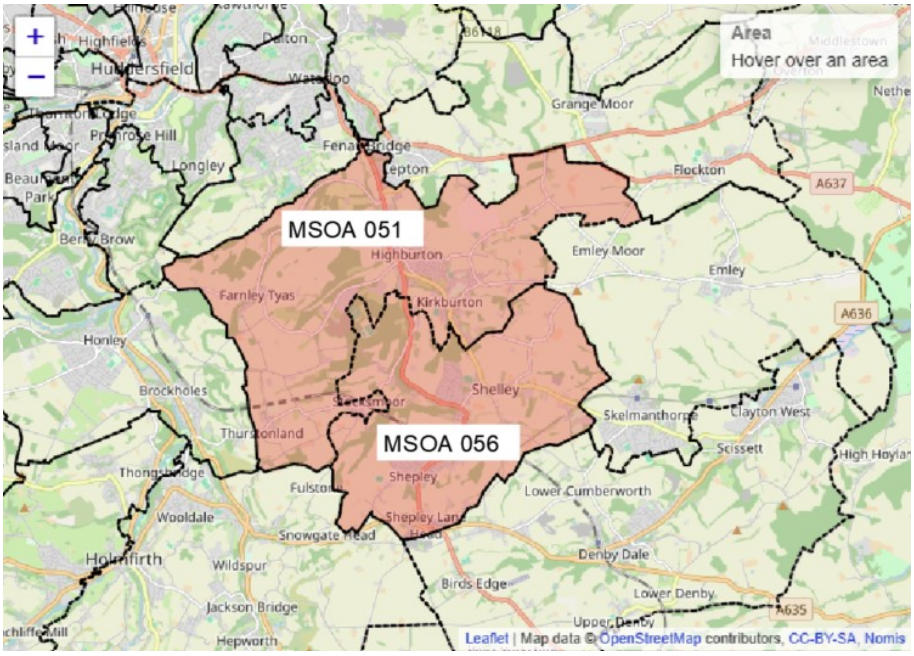

Figure 2 – Middle Super Output Area (MSOA) 051 & 056

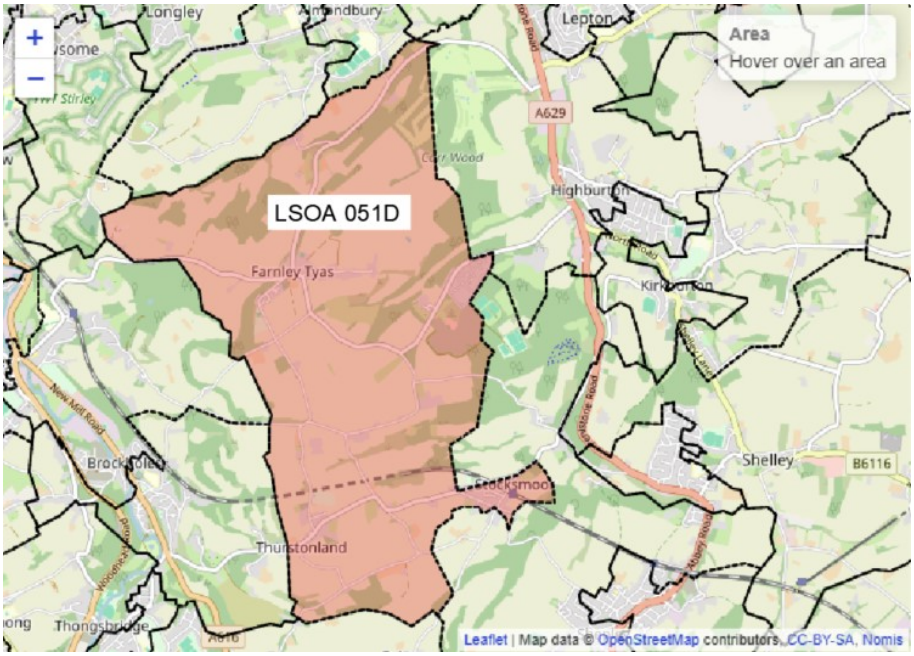

Figure 3 – Lower Super Output Area (LSOA) 051D

5.35 The Appellants H&T SoC document [CD 8.2] has assigned commuter trips using 2011 Census data for MSOA 051 & 056. Whilst it has not been confirmed in the report, it is understood that this has been done using the *'WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)'* dataset, utilising the car/van driver data. This assessment approach is relatively standard and has been used for many years, and can provide an indication of commuter traffic distribution (and is often uses as a proxy for the modal split for all journey types). However, the 2011 Census data is now old and does not reflect current commuter patterns. Unfortunately, the later 2021 Census data cannot readily be used for the same purpose, as it was affected by Covid restrictions, so there is no more recent Census data that could be used. Therefore, the usefulness of the 2011 Census data is diminishing, as the data is outdated and unreliable. This is one of the reasons why the LPA had asked for a 'first principles' type assessment of trips by all modes and trips types for the assessment, and accords with the principles in the NPPF that require a Vision-led approach to assessment and not 'predict and provide' as has been done consistently by the Appellant's various transport consultants in their assessments.

5.36 Whilst it is acknowledged that the 2011 census data can still give an indication of commuter traffic distribution, this type of assessment is open to significant interpretation and requires many judgements to be made regarding route choice

between the origin (home) and destination (work) of these trips. In the new assessment included in the Appellant's H&T SoC document, which includes the detailed data and distribution assumptions at (Appendix I of the Appelland's H&T SoC [CD 8.2]), there has been no attempt to try and simplify the assessment to make the routing assumptions more transparent and auditable. Instead, separate traffic distribution assumptions have been made for 153 different MSOA areas, which makes it extremely difficult to check and validate each assumption. A much better approach, which is easier to audit, is to group the more distant MSOA into larger areas (e.g. all Leeds areas could have been grouped together rather than having 19 different Leeds MSOA areas to check). Notwithstanding this, some of the route choices that have been assumed are questionable. For example, there are a number of commuters to MSOA areas in Sheffield that have been assumed to travel via New Mill to the west (avoiding Stone Wood Lane), which would appear to be an error (i.e. the easiest way to travel to urban areas in Sheffield is either via the M1 or via the A629, which are to the east and south, and not to the west of Stocksmoor). Also, for commuters heading to all MSOA in Leeds, none of this traffic had been assigned to use Stone Wood Lane, which is clearly wrong, as it is quicker (or at least as quick, notwithstanding the problems on Stone Wood Lane) to travel to all areas of Leeds via the M1 rather than the M62, and Stone Wood Lane potentially provides a quicker route to the M1 (as the route avoids more congested routes and involves fewer junctions to contend with). To illustrate this issue, in **Appendix G**, I have included an illustrative check of journey times during the AM peak period heading toward Leeds (Elland Road Park Ride has been shown as a potential destination, as this could be used for onward journeys to Leeds city centre), which indicates that travelling via Stone Wood Lane would be a realistic option for travelling to Leeds (or any other destination accessed via the M1).

5.37 In addition to the flawed / questionable assumptions relating to the route choice in the Appellant's new commuter traffic distribution, the data analysis is also flawed. As can be seen from the data in Appendix I of the H&T SoC document [CD 8.2], the dataset they have used includes 3,714 commuters. However, within the MSOA 051 & 056 dataset, there are 4,212 commuters. Therefore, the analysis ignores circa 12% of commuters from the dataset. There is no explanation in the H&T SoC

document to explain why this is the case. However, it appears that all MSOA with 3 or fewer people have been removed from the analysis. This approach is flawed, as it discounts MSOA areas that include a smaller work (destination) population, which are likely to be MSOA further away from the Appeal site. These excluded MSOA are more likely to be accessed via the motorway network, with the nearest connection to the motorway (M1) being to the south and east. Therefore, this is also likely to diminish the traffic distribution assigned to use Stone Wood Lane.

5.38 There are also various flaws in the new assessment relating to education trips contained in the H&T SoC document [CD 8.2]. Whilst it has not been acknowledged in the Appellant's assessment, there are school buses to both Kirkburton Middle School and to Shelley High School that are available in Stocksmoor. Therefore, the assumption that secondary school children will be driven to school by car in the same proportion as primary school children is not accepted, and certainly does not align with a Vision-led approach to transport planning (e.g. a target of the site's Travel Plan should be to encourage all secondary school children to use the bus if they are able).

5.39 The assumption that primary school children (that are most likely to be driven to school by car) would be evenly split between Thurstonland First School and Shepley First School is also questionable. Whilst for education planning purposes, the Appeal site sits within the Thurstonland Primary Admission Area (PAA), this does not mean that parents are most likely to choose this school. Similar to the MSOA data, the Appeal site sits on the boundary of the Thurstonland and Shepley PAA's and so these areas should be grouped together if this is being used to judge which primary school children from the Appeal site may attend, and if a consistent approach to data analysis is being used (e.g. to reflect the Appellant's approach of combined MSOA from two areas, due to the site being on or close to the boundary). Using the same 2024 school planning data as used in the H&T SoC document (but using Table C that focuses on where children live in the local area, which is included in **Appendix D**) this indicates that there are 253 children in the Shepley First School and Thurstonland First School PAAs, of which 139 (55%) attend Shepley First School and 42 (17%) attend Thurstonland First School, with the remainder choosing other first schools. Therefore, it is not a robust assumption to assume an even split (as has been done in the Appellant's H&T SoC document

[CD 8.2]) of children attending each first school, when the majority of children in the two combined PAAs attend Shepley First School (with Shepley First School also being marginally closer to the Appeal site). I note that I do not suggest that the above alternative assumption is the true split of where parents will prefer to send their children to go to primary school, but is presented to demonstrate the flaw in the Appellant's assumptions. Given that Stocksmoor Vision have Rule 6 status at the Inquiry, this local group may be able to provide more information on this matter.

5.40 For the shopping and 'other' trips, the H&T SoC document [CD 8.2] has made the assumption that 25% of these trips will distribute on four identified primary routes. However, this is no more than an assumption, which is not based on any evidence. The only justification provided for this is that a *'robust allowance'* for traffic heading towards Skelmanthorpe and the motorway network via Stone Wood Lane has been identified. However, the LPA do not consider this to be a robust assumption, as the route via Stone Wood Lane to the M1 may be marginally longer, but is likely to be quicker (or at least as quick, as mentioned above, and is illustrated by the journey time information in **Appendix G**) than alternative routes, as this route avoids other congested streets (e.g. Far Bank, which has extensive on street parking, and a primary school that is busy during the AM peak period).

5.41 In summary, the Appellant's H&T SoC document [CD 8.2] includes a completely new assessment of development traffic generation and distribution (the scope of which had not been previously discussed or agreed with the LPA contrary to the NPPF & PPG). The Appellant's new assessment concludes at paragraph 5.7.2 of the H&T SoC document by stating:

> *'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 25% of the total 28 vehicle movements predicted (see Table 5.4), which is considered to be robust taking account of each journey purpose and some of the worst-case assumptions applied.'*

5.42 The LPA do not accept that the new assessment provides a robust basis for assessment or that it is based on worst-case assumptions. The assessment also

fails to take account of the sites relatively low level of accessibility and includes numerous questionable assumptions and apparent flaws.

5.43 Therefore, all of these factors result in all of the Appellant's various transport assessments (and trip generation assessments) not being robust, and failing to comply the 'Planning Practice Guidance (PPG) - Travel Plans, Transport Assessments and Statements' [Paragraph: 015 Reference ID: 42-015-20140306, bullet points 4, 9, 11 & 12] and Active Travel England (ATE) 'Standing Advice Note: Active Travel and Sustainable Development' [CD 7.15 - toolkit criterion 1-5]. The Appellant has also continually failed to agree the scope of the assessment(s) with the LPA, which was highlighted as being necessary at the pre-application stage, and is important for any Transport Assessment, as indicated at Paragraph's 14 and 15 of the above PPG [Paragraph: 014 Reference ID: 42-014-20140306 and Paragraph: 015 Reference ID: 42-015-20140306].

Future Year Assessment and Design Flows on Stone Wood Lane

5.44 In the Appellant's H&T SoC document, it is suggested at paragraph 5.3.2, that 2030 is considered to represent a robust future design year. Paragraph 5.3.3 goes on to set out background traffic growth rates from 2025 to 2030, utilising data obtained from Tempro 8.1 for average values within for Kirklees MSOA 051 & 056, which provide growth factors of 1.052 for both AM and PM weekday peak periods. Both the future design year, and the proposed growth rates are accepted.

5.45 The Appellant's H&T SoC document [CD 8.2] then utilises these growth rates to determine 2030 Base Traffic Flows, as shown in their Table 5.2. However, as previously identified (See Table 1 above and **Appendix A**), the previous ATC survey data undertaken for the original Transport Assessment identified a higher average weekday peak hour flow than has been identified in the Appellant's data. Therefore, the alternative traffic flow data I have identified in Table 1 has been used as the basis to apply the future traffic growth, to ensure a robust assessment. This revised data is included in Table 3 below:

	Table 3 - Weekday Peak Hour Two-way Flows on Stone Wood Lane			
	AM Peak (0800-0900)		PM Peak (1700-1800)	
	Vehicles	Comment	Vehicles	Comment
Row A Max. Average Weekday Base ATC Flows (See Table 1)	69	TA w/c 12/04/24	74	H&T SoC w/c 18/09/25
Row B Max. Weekday ATC Flows (See Table 1)	90	TA 12/04/24	89	H&T SoC 18/09/25
Row C 2030 Base Traffic Flow	73	Row A Flow x 1.05	78	Row A Flow x 1.05

5.46 In the Appellant's H&T SoC document, 'Design Traffic Flows' have been identified in their Table 5.2 for Stone Wood Lane.

5.47 However, the LPA have produced their own Table 4 below, which shows the Design Traffic Flows on Stone Wood Lane that I consider provide a more robust basis for assessment. This information has been produced, as the Design Traffic Flows presented by the Appellant in their H&T SoC document 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).

5.48 These Design Traffic Flows are slightly different to the Appellant's data, as they include the more robust average weekday peak hour flows identified previously in Table 1 of this report, together with the adjusted 'Sensitivity Test' development flows (that include the 10% reduction due to the agreement to provide the Residential MCard scheme), again to ensure a robust assessment. An additional Design Traffic Flow scenario has also been included, which add the existing maximum weekday peak hour flows I have identified in Table 1 above (with no traffic growth applied), together with the adjusted 'Sensitivity Test' development flows, which demonstrates that weekday peak hour flows could exceed 100vph (a key threshold when considered shared surface highways, as previously identified in Section 4). The LPA's Design Traffic Flows can be seen in Table 4 below:

Time Period	Table 4 - Two-way Vehicle Movements on Stone Wood Lane				
	2030 Base Flows	**Max. Weekday ATC Flow**	**Adjusted 'Sensitivity Test' Development Trips**	**2030 Base + Development**	**Max. Weekday (no traffic growth applied) + Development**
AM Peak Hour (08:00 to 09:00)	73	90 (on 12/04/24	16	89	106
PM Peak Hour (17:00 to 18:00)	78	89 (on 18/09/25)	16	94	105 (Note: Corrected number from LPA SoC Appendix 1)

5.49 In summary, I accept the future design year of 2030, and the proposed traffic growth rates contained in the Appellant's H&T SoC document [CD 8.2]. However, I have provided a more robust assessment of future design year traffic flows on Stone Wood Lane, utilising all of the base traffic count data available (from all three ATC surveys provided by the Appellant in their various assessments, which show higher average weekday flows than used in the Appellant's assessment), and have utilised the maximum peak hour flows recorded from the various surveys as an additional test scenario, as I do not consider the assessment provided by the Appellant in their latest assessment to be suitably robust.

Materiality Assessment of Traffic Impact on Stone Wood Lane

5.50 To consider the magnitude of traffic impact of development traffic on Stone Wood Lane, the adjusted 'Sensitivity Test' assessment flows (e.g. using the reduced 0.630 two-way weekday peak hour vehicle trip rate that includes a 10% reduction that assumes an affective Travel Plan would be implemented, and a simplified assessment of traffic distribution that assumes 50% of development traffic utilises Stone Wood Lane) that I have identified above have been utilised. Also, whilst I do not accept the Appellant's new trip generation and distribution methodology contained in the H&S SoC document, as it is not considered to be robust, the Appellant's suggested development traffic flow scenario has also been considered below for completeness. The development traffic increases for both scenarios have been compared to the maximum average weekday base flows obtained from the three ATC surveys (e.g. those shown in Table 1 of this report) as shown in Table 5 below:

	Table 5 Base + Development Weekday Peak Hour Two-way Flows on Stone Wood Lane			
	AM Peak (0800-0900)		PM Peak (1700-1800)	
	Vehicles	% Increase	Vehicles	Comment
Base Flow (Table 1 Row A)	73	N/A	78	N/A
Adjusted 'Sensitivity Test' Flow	16	21.9%	16	20.5%
Appellants H&T DoC Flows	7	9.6%	7	9.0%

5.51 In the Appellant's H&T SoC document [CD 8.2] (and in the previous Transport Assessment Addendum [CD 1.33]), they have made reference to the previous 'Guidance on Transport Assessment' (GTA) [CD 7.17] document produced by the Department for Transport (DfT) in 2007, which has since been withdrawn and replaced by the current NPPF Planning Practice Guidance (PPG) and have stated that:

'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 further 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.

It is evident by any measure than an additional 7 two-way vehicular trips along Stone Wood Lane, which equates to one additional vehicle every 8 ½ 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 6.'

5.52 Whilst I acknowledge that the 30 two-way trip threshold is often still used in certain circumstances, such as when to consider detailed junction capacity modelling, I do not accept this as an appropriate threshold that serves any purpose in this situation for the reasons that follow. It is also noted that the same section (relating

to when an assessment was needed) of the former GTA document [CD 7.16] states at paragraph 2.13:

> *'These thresholds are for guidance purposes and should not be read as absolutes. There are a range of qualitative factors that need to be taken into account that the thresholds do not necessarily capture. There will also be site-specific issues that assessments will need to take into account. In some circumstances, a TA may be appropriate for a smaller development than suggested by the thresholds…'*

5.53 The current Planning Practice Guidance (PPG) [Paragraph: 013 Reference ID: 42-013-20140306] also recommends a similar approach, suggesting that assessment thresholds need to be considered on a case by case basis, and take account of impact on sensitive areas, which is the case with the impact on Stone Wood Lane due to its constrained nature and its important local (and national, given that it is a NCN route) access function for active travel users.

5.54 Of more help in considering the significance of the traffic impact on Stone Wood Lane is the former 'Guidelines for Traffic Impact Assessment' document produced by the Institute of Highways & Transportation (IHT) in 1994 (GfTIA)[CD 7.16 - Section 3.1 relating to the scope of assessment, including paragraphs 3.1.5 & 3.1.10], which was superseded by the aforementioned GTA document [CD 7.17]. This former guidance document suggested that traffic impact may be considered material or significant should there be an increase of 10% of traffic on a link, or 5% in sensitive locations, which would apply to Stone Wood Lane. The guidance also suggested that lower percentage increases may also give rise to concerns. Based on these thresholds, which were previously deemed to represent material increases in traffic, it is clear that the scale of impact of development traffic on Stone Wood Lane is material, with development traffic increases of over 20% based on the adjusted 'Sensitivity Test' assessment trips (as can be seen from Table 4 above); and even when considering the lower trip generation and distribution estimates proposed in the Appellant's H&T SoC document [CD 8.2], which I have demonstrated are not robust, the 5% threshold for a material or significant impact in a sensitive location is still exceeded.

5.55 It is also noted that the GfTIA document [CD 7.16], also includes a detailed guidance on how the impact on road safety (Section 3.10) should be assessed, stating at paragraph 3.10.2:

'The required scale of accident investigation and consideration of safety issues will be dependant on the scale of the development and its location, particularly when proposals are being promoted in the vicinity of known hazardous locations. Some consideration should be given to safety issues in all TIAs, the most common problem being the creation of new or more intensive conflicts between vehicles and vulnerable road users such as pedestrians, cyclists, children and the elderly'.

5.56 It is also interesting to note that paragraph 3.10.4 of the GfTIA document [CD 7.16], mentions specific guidance used by Kirklees Highway Development Management at the time of publication. This demonstrates the importance of carefully considering road safety matters has been a key issue for Kirklees Councils (amongst many other authorities) for many years. This continues to be the case, as is demonstrated by Kirklees Council's commitment to implement the West Yorkshire Vision Zero Strategy [CD 7.11], which is confirmed in Policy S-2 (see page 31-32) of the recently adopted Kirklees Transport Strategy [CD 6.29], where our aim is to ensure that there are no deaths or serious injuries on our roads by 2040.

5.57 In conclusion, I do not accept the Appellant's assertion in their H&T SoC document [CD 8.2] that the former 'Guidance on Transport Assessments' document's assessment threshold of 30 two-way peak hour trips has any bearing on the Appeal. I consider that the thresholds identified in the earlier 'Guidelines for Traffic Impact Assessment' document produced by the Institute of Highways & Transportation (IHT), are of more help to consider the significance of the impact of development traffic from the Appeal site on Stone Wood Lane, and in particular those impacts on Highway Safety. Based on this former guidance, which suggests thresholds for material or significant traffic increases at 10% on a link, or 5% in sensitive locations, it is clear that the scale of impact of development traffic on Stone Wood Lane is material, even when considering the Appellant's new development traffic assessment methodology, which I do not consider to be robust.

Proposed Stone Wood Lane Highway Improvements

5.58 At Section 6 and 7 of the Appellant's H&T SoC document [CD 8.2], they have set out what they consider to be the benefits of the proposed works on Stone Wood Lane, which they have stated *'will not only mitigate the low impact of the development proposals but will also provide a betterment to existing users of the route including pedestrians, cyclists, horse riders and drivers.'*

5.59 Whilst the LPA continues to accept that the works (i.e. those shown on the drawings submitted and considered at the application stage) in themselves may provide some marginal improvement over the current passing bay arrangements, I still conclude that the works are inadequate to mitigate the adverse impact of additional development traffic along Stone Wood Lane on all users, which will be particularly detrimental to active travel users.

5.60 To help to demonstrate that the proposed passing places (i.e. those shown on the drawings submitted and considered at the application stage) provide only marginal improvement, a critique of each proposed location is in included in **Appendix H**, with a summary of the finding as follows:

- All of the passing place improvements are proposed in locations where passing already takes place, which includes at gate entrances, on verge areas, and in other naturally created passing places (e.g. not hard paved carriageway areas). Therefore, whilst the proposals would provide a better quality carriageway surface in some of these locations, no entirely new passing places for cars/vans would be created. Therefore, the proposals would not increase the frequency of passing place locations.

- The proposals would increase the size of some of the passing places. However, some of the passing places could only accommodate one small vehicle at best, so would not be effective. Also, some of the passing places are only 4.2m wide, so would be inadequate to enable two cars to safely pass, and would not allow a car or van to safely pass a horse rider. This is compounded by the adjacent highway boundary features (walls, fences, embankments and vegetation), which immediately abut some of the widened passing places, which would be hazardous for cyclists (who required a minimum of 0.5m offset to vertical features) and other highway users. Therefore, the extra carriageway width

proposed in many locations would not provide any material benefit, as it is the adjacent highway boundary feature that are the constraining feature, and not the available carriageway width.

- No swept path analysis has been provided by the Appellant, but it is clear that some of the proposed passing places are unusable (at least in a safe manner), and so will not deliver the benefits that the Appellant suggests.

- Whilst some vegetation clearance has been noted on the plans, there are still a number of sections along the route where there would be inadequate inter-visibility between passing places, which cannot be improved due to the horizontal and vertical alignment of the highway. The vegetation clearance suggested (but not specifically identified on the plans) would be largely ineffective, and to improve visibility further would require extensive removal of mature trees, and would require land beyond the highway boundary. It is also noted that regular highway maintenance already takes place along the route, so the suggested vegetation clearance would do no more than already routinely occurs along the route.

- Even with the improvements, there would still be a number of sections of Stone Wood Lane where the spacing of passing places are well beyond the recommended maximum separation distances, and the suggestion that the works would reduce these separation distances is marginal, even assuming that the proposed passing place improvements were workable, which they are not in a number of cases.

- The proposals appear to impact a number of highway boundary walls, embankments and other features. This impact has not been clearly identified on the submission plans. As such, it is unclear whether some of the works are viable / deliverable, and are likely to require agreement with third party landowners to allow them to be implemented (e.g. the removal of the wall at passing place location PP – E, near chainage 340, would appear to require the removal of a dilapidated wall that would not form part of the highway; and other walls will need to be rebuilt if the carriageway is moved closer to them).

5.61 In an email received on Monday 19th January 2026 at 17:51 [CD 5.5], the Appellant provided a revised package of passing place improvement drawings, produced by their new consultant (Optima), as shown on drawings 25072/GA/01, GA/02, GA/03 and GA/04. In the email, the Appellant suggested that whilst they consider the improvement drawings submitted at the application stage satisfactorily mitigate the impact of the development, they have produced these new drawings to *'further improve on the TPS proposals'.* The submission of these new plans at this late stage gives rise to various problems, which are summarised below:

- The late submission of the plans does not allow the LPA adequate opportunity to scrutinise the revised designs in any detail, in advance of the deadline for the submission of evidence on 27th January 2026.
- It is unclear why these new proposals have been submitted at this late stage, given that there has been no previous mention from the Appellant that revised designs were to be provided. This includes at the Case Management Conference, where it would have been expected that this intention would have been highlighted.
- The revised proposals have been provided with little, if any, explanation of what changes have been made, or any explanation of why the changes have been made. Instead, it has been stated that further explanation will be provided later in Mr Owen's (the Appellant's latest transport consultant) evidence. Without this explanation, it is clearly not possible for the LPA to understand the revised proposals in any detail.
- The provision of these new designs also appears contrary to the Appellant's suggestion that the previous designs were adequate, given that they now feel it necessary to provide alternative designs. This begs the question, what does the Appellant think was wrong with the previous proposals?
- The brief supporting email that accompanied the drawings, suggested that the new proposals broadly align with several of the passing places previously proposed, but with some variation on their design and location. As mentioned above, it is unclear what changed have been made, or why. It is also apparent that there have been some significant alterations, which

include the omission of one of the improved passing places (at the passing place Location PP – I, near chainage 530).

- Given that we now have two sets of quite different passing place proposals from the Appellant, it is unclear what we are now being asked to consider. This also has implications on how any proposal could be conditioned, should the Appeal be allowed. It is unclear whether it is expected that the LPA will need to choose a preferred design, a combination of the two, or a general condition that requires passing place improvement.

- It is also unclear how the new consultant has managed to find additional width within the highway to provide the enlarged / amended passing places shown on the new plans. It was already questionable whether the previous proposals were deliverable due to highway boundary and alignment constraints, given that the works impact on adjacent banking, trees, fences, walls and other features alongside the proposal passing bays, which continue to not be accurately shown on the plans (or are completing missing is some cases, including many trees that have been omitted from the drawings). Therefore, these revised proposals, with no detail of the impact on these existing highway features, raise further questions over their deliverability. Of particular concern is the impact on various trees alongside the roadside, some which are understood to be of high value (e.g. a large oak tree may be affected in one location), which has not been assessed.

- It is also unclear how the extent of the highway boundary has been assessed, as the drawings mention that this has been indicatively taken from OS mapping, which is not an accurate record of highway features. Therefore, it is unclear whether the proposals are deliverable within the highway boundary. This is of particular concern for the amended passing place around Ch. 340 (My reference PP-E that Optima have called Passing Place 4), which they have now extended, and appears to require the (further) removal of part of a dilapidated boundary wall that is not thought to form part of the highway (as highway boundary features are typically owned by the adjacent landowner, with the exception of some highway retaining walls that have been built by the Highway Authority, which is not

the case here). This can be seen on Photo 9 below, with a circa 1m section of wall (as can be seen by the 1m long wooden staff seen on top of the wall in the picture), within unknown ownership needing to be removed. To highlight that the wall, and the gate entrance behind it may not be highway, there is evidence of an old / rotten gate post (the left side of the wooden staff shown in Photo 9), which appears to suggest that the new gate that can been in the photo has been set back into the field, from an earlier position at the southern extent of wall that is proposed to be removed.

Photo 9 – At Ch. 343 looking at dilapidated wall affected by works at PP-E (My reference) / Passing Place 4 (Optima reference)

5.62 Whilst there is a lack of adequate information currently available to consider the alternative passing places proposals, my initial comments are below (this includes my previous passing place references, and the new references provided on the Optima drawings):

- Passing Place 1 (my reference PP-A) – Some (unspecified) geometry changes have been made. The reasoning for this is unclear, but appears to have made the passing place slightly shorter than previously proposed at the southeastern end.

- Passing Place 2 (my reference PP-B) – Some (unspecified) geometry changes have been made. The reasoning for this is unclear, but appears to have again made the passing place slightly smaller than previously proposed. However, this does not appear to materially change the design, other than a slightly better exit taper.

- Passing Place 3 (my reference PP-C) – Some (unspecified) geometry changes have been made. This appears to be due to the lack of adequate visibility associated with the previous design. This now results in the passing place improvement including minimal alterations to the existing provision (but with some minor widening to allow the 4.8m width to be provided for 2 cars lengths).

- Passing Place PP- D – The previous improvement at this location has now been omitted, with the drawings now suggesting there would be 'nominal' carriageway widening only. Given that the previous improvement works would not have provided a material benefit in this location, as forward visibility was sub-standard from the extended passing place, then the removal of the improvement only appears to be a minor downgrade to the previous proposals.

- Passing Place 4 (my reference PP-E) – As previously mentioned, this amended passing place improvement impacts on the dilapidated boundary wall that can be seen in Photo 9. Therefore, the revised (and previously submitted) proposals are unlikely to be deliverable.

- Passing Place 5 (my reference PP-F) – This passing place has been relocated and amended significantly from the previous proposals. Given the lack of information on the plans, including many existing trees that have been omitted, it is not possible to check whether these works are deliverable. However, it appears that they would require the loss of a number of trees, impact the banked verges on either side of the road (that support the boundary wall on the south side), and require alterations to the boundary walls (the walls on both sides would need to be rebuilt to deliver this improvement). Therefore, it is unlikely that these works are deliverable. It is also noted that the passing place has been shown at 4.2m, using

virtually all of the highway width (the highway is circa 4.7m wide between walls in this location, based on the Appellant's topographical survey data). Therefore, in practice, the proposed carriageway widening cannot be fully utilised, due to the required offset from boundary walls (i.e. 0.5m clearance is required for cyclists, to avoid clashes with handlebars and pedals), so the affective width of the passing place would be only circa 3.7m (i.e. 4.7m highway width, minus 2 x 0.5m margins from the walls on either side).

- Passing Place 6 – This is a completely new passing place that did not feature in the previous design. This has been shown at 4.8m wide. However, as with passing place 5, in practice, this carriageway width cannot be fully utilised, due to the required offset (0.5m) from boundary walls. These works would also appear to impact on the adjacent highway boundary features, with no details of what the new treatment would be or whether there is agreement with the owner of these features to make the necessary changes.

- Passing Place 7 (my reference PP-G) – This passing place has been elongated and made wider to 4.8m, which could be beneficial. However, as with the new passing place 5 & 6 designs, it would impact adjacent boundary features and is unlikely to be deliverable as currently shown. This is particularly the case at the northwest end of the taper, which abuts the highway boundary wall. Therefore, it appears that this amended design is not deliverable, and it is not feasible to extend the existing informal passing place in this location, without removing a significant number of trees and rebuilding the boundary walls (which has not been indicated, and is unlikely to be deliverable).

- Passing Place 8 (my reference PP-H) – This passing place has been shown to be enlarged, with the aim of achieving a slightly wider 4.4m passing place that is 6m long. However, as with the new passing place 5, 6 & 7 designs, the passing place is shown built immediately up the highway boundary walls. This is likely to require the walls to be rebuilt and strengthened, which is unlikely to be feasible (unless the Appellant can agree this with the landowner). It would also mean the effective width of the passing place is

less than 4.4m, given the need for a 0.5m offset from the walls to allow safe passing for cyclists (e.g. 4.0m + 2 x 0.5m = 5.0m highway width is needed for a car to safely pass a cyclist).

- Passing PP-I – This has now been omitted from the latest proposals.

5.63 Given the late submission of these revised passing place proposals, the lack of explanation of the changes that are now proposed, and the lack of any context why design changes are being made at all (together with the other problems described above), the LPA reserves the right to comment further on the proposals once more detail has been provided. If necessary, further comments will be provided in rebuttal evidence in due course. However, based on the information currently available, and the limited opportunity that has been given to review the proposals, it is clear that they do not change the LPA view that the proposals are inadequate to mitigate the impact of the development and provide minimal improvement to the current passing place provision. In a number of locations, they also appear to be undeliverable (at least as shown). This includes impact on features alongside the highway boundary, including impacts on trees, bankings, walls and fences, which appear to require significant amendment/upgrade; and some of which will not form part of the highway, so would require the consent from the adjacent landowner.

5.64 In conclusion, whilst it is welcomed that the Appellant eventually accepted that improvements were necessary to mitigate the impact of the development on Stone Wood Lane, their proposals only provide margin benefits to some of the existing sub-standard informal passing places that already exist along the route. These proposals will not offset the negative impacts of the development traffic, in terms of highway safety and amenity for of all users, and do little to assist active travel users on this important active travel route. The mitigation works will also do nothing to address the most problematic section of Stone Wood Lane on the steep single-track section through Stone Wood. There are also concerns that a number of the improvements may not be deliverable, due to impact on third party land (e.g. features along the highway boundary) and unknown impacts on various trees that are not shown on the proposal plans.

5.65 Therefore, the additional development traffic generated along Stone Wood Lane will increase the risk of collisions, which is of particular concern for vulnerable road users on this rural highway. Should a collision occur on the route involving a vulnerable road user, this could result in a severe (or worse) incident, which is unacceptable and contrary to the West Yorkshire Vision Zero strategy [CD 7.11].

The amenity of active travel users

5.66 In the light of the existing highway safety and operational concerns on Stone Wood Lane identified in Section 4, which have the greatest adverse impact on active travel users, it is considered that active travel users, including walkers, cyclists and horse riders, would be likely to be further discouraged from using the route due to the impact of additional development traffic. This includes during network traffic periods, where it already appears that these users are being discouraged from using the route to some extent.

5.67 In addition, because of the configuration of Stone Wood Lane, including its limited widths at various points, active travel users need to pause at various points if they meet a vehicle, including stepping to the side of the road or onto the verge (where they are available) whilst the vehicle passes them. The disruption of having to do so repeatedly when travelling along the route is likely to detract from the convenience and amenity of all active travel users. The additional traffic associated with the development would materially increase the likelihood of such users meeting passing vehicles, and would thus further detract from their convenience and amenity when using the route.

5.68 To put this into context, the most constrained section of Stone Wood Lane is approximately 800m long (between Ch. 0 to Ch. 800 / PP-J). Therefore, based on a walking speed of 1.2m/s, this walk would take approximately 11 minutes (google maps suggest around 13 minutes, so is a modest estimate for this walking distance given the steep hill that needs to be negotiated). Based on the maximum 'with development' traffic flow of 106 vehicles in the weekday AM peak period identified in Table 4 above, a pedestrian would be expected to be passed by 19 vehicles during this walk. Having to step into a verge (if one is available), and wait for a vehicle to pass this number of times on such a short walk is highly

inconvenient for these users (in addition to the safety risks I have identified), will add significant delay to their journey and reduce their enjoyment of using the route.

5.69 Therefore, additional development traffic along Stone Wood Lane, particularly during network periods, is likely to discourage active travel users from using this route. As such, it would conflict with the aims of Local Plan policies and the NPPF, which seek to promote and encourage active travel and reduce private car use and dependency.

6. Summary and Conclusions

6.1 The 1.05km length of Stone Wood Lane between the Appeal site and Shepley is subject to the national speed limit, is unlit, and signed as unsuitable for HGV's. Due to the lack of footways, it operates as a shared surface highway.

6.2 The road provides an important local access function, particularly for residents of Stocksmoor, providing the most direct route to Shepley, where there are a range of facilities, including education uses, shops, medical facilities, and other amenities required on a daily basis. To access these facilities by active travel modes from Stocksmoor, Stone Wood Lane is the most direct route, and the only available route for pedestrians based on a reasonable walking distance.

6.3 Stone Wood Lane forms part of National Cycle Network (NCN) route 627 and the Trans Pennine Trail, and so is of regional and national importance.

6.4 Whilst the number of existing active travel users on the route may be considered low in an urban context, it is a well-used rural road, used on daily basis by pedestrians, cyclists and horse riders. However, active travel users may already be avoiding the route to some extent during weekday network peak periods, possibly due to the effect of motor vehicle traffic on their safety, comfort and enjoyment of the route.

6.5 Stone Wood Lane is single-track for much of its length, and has sub-standard passing places, in terms of frequency, geometry and lack of adequate inter-visibility. It also has a range of other physical constraints along the route, including sub-standard carriageway widths, alignment, lack of adequate forward visibility, and steep gradients. There are no dedicated pedestrian facilities, and the verges that exist that allow pedestrian to step off the carriageway to avoid passing vehicles, are consistently narrow or absent in places.

6.6 The existing physical constraints and operational issues I have identified, give rise to highway safety concerns for all users, but are most problematic for active travel users, who are at risk from passing traffic, and in particular from reversing vehicles, which occur frequently during network peak periods, due to the sub-standard passing place provision. These reversing manoeuvres, which are often over long

distances and involve multiple vehicles, compound the highway safety risks, and are difficult for drivers due to the physical constraints along the route.

6.7 Of greatest concern is the long section of single-track road on the hill through Stone Wood, which lacks inter-visibility between passing places, has sub-standard forward visibility at the top of the hill at the bend, where the road transitions between single-track and two-way. This single-track section also lacks suitable verges where pedestrians can safely wait to allow traffic to pass. Problems occur on this single-track section on a regular basis, where vehicles frequently come into conflict. This results in long and hazardous reversing manoeuvres, which are of most concern to waiting pedestrian who are at risk of being struck by these vehicles. This section of Stone Wood Lane is beyond the scope of the proposed mitigation measures, and so the existing problems in the area, and many other sections of the route, will be exacerbated by additional development traffic.

6.8 The Appellant has suggested that the lack of recorded personal injury accidents demonstrated that Stone Wood Lane operates safely. This is a flawed assumption, and ignores the concerns expressed by local people, and the clear highway safety issues associated with this shared surface rural road, where the safety and amenity of active travel users is critical.

6.9 Whilst existing traffic speeds along the route may be low compared to the national speed limit that is in force, these speeds are not low based on the context of the road. The existing traffic speeds along the road range from 22.1 - 33.3mph, with some well in excess of these speeds. These speeds are higher than are acceptable for a shared surface road, with a maximum speed of 20mph regarded as the upper limit for the safety and comfort of active travel users. The speeds are also higher than the design speed of the road, based on its physical constraints, which mean that safe levels of inter-visibility between motorists and active travel users, and other motorists, is not available for much of its length.

6.10 Similarly, whilst existing traffic flows may be low compared to a local distributor type road, with existing peak hour flows of up to 90 two-way vehicles per hour, they are not low for a shared surface road. The upper limit of traffic flows for shared surface roads based on local and national guidance is 100 vehicles per hour.

Above this level, guidance suggests that roads become dominated by motor vehicles, to the detriment of active travel users.

6.11 Based on the 'Sensitivity Test' trip rates used in the Transport Assessment Addendum submitted at the application stage, and that I have now suggested should be reduced by 10% to take account of the agreed Travel Plan measures, the development is estimated to generate up to 32 two-way weekday peak hour vehicle trips. Based on a reasonable future scenario of 50% of development traffic using Stone Wood Lane during peak periods, this equates to an additional 16 two-way weekday peak hour vehicle trips along the route. Based on the current maximum two-way flow of 90 two-way vehicles, development traffic would increase traffic flows to over 100vph, in exceed of the maximum upper limit for a newly designed shared surface road, which Stone Wood Lane falls well short of in design terms.

6.12 The Appellant does not accept the Sensitivity Test trip rates, which were agreed at the application stage, and have now undertaken a further assessment of development traffic, using a new assessment methodology. This new methodology was not agreed by the LPA, which has been requested consistently since the pre-application stage, and is contrary to national guidance that requires assessment scenarios to be agreed in advance. The Appellant's new assessment of development traffic and distribution includes a number of questionable assumptions and apparent flaws, which makes it unreliable. The Appellant's new assessment is also not robust, as it does not take into account the sites low level of accessibility and very limited amenities in Stocksmoor, which will result in the development being heavily reliant on private car use. Based on the Appellant's assessment, they consider that the development would generate 28 two-way network peak hour vehicle trips, of which they consider 7 two-way trips would use Stone Wood Lane. I do not accept that this is a robust assessment and under-estimates the impact of development traffic on Stone Wood Lane.

6.13 National guidance on the production of Transport Assessments requires that a range of realistic future scenarios are assessed. Therefore, as I have demonstrated, even if the Appellant's assessment of development traffic flows and distribution were accepted, which I have demonstrated is not robust, this would

still represent a material increase in traffic along Stone Wood Lane, with traffic increases of between 9-10%. This is in-excess of what previous national guidance (as current national guidance is silent on this matter) suggested represented a material increase in traffic in sensitive locations of 5% (or 10% in other locations), which I believe is still a useful threshold to consider matters of highway safety impact. Based the 'Sensitivity Test' trip rate scenario, (including the 10% Travel Plan reduction), the impact would be much greater, with the increase in traffic along Stone Wood Lane being between 21-22%.

6.14 Whilst it is welcome the Appellant eventually accepted improvements were necessary to mitigate the development's impact on Stone Wood Lane, their proposals provide only margin benefits to some of the sub-standard informal passing places that already exist along the route. These proposals will not offset the negative impacts of development traffic, in terms of highway safety and amenity for of all users, and do little to assist active travel users on this important active travel route. The mitigation works also do nothing to address the most problematic section of Stone Wood Lane on the steep single-track section through Stone Wood. There are also concerns that a number of the improvements may not be deliverable, due to highway boundary constraints and unidentified impacts on trees.

6.15 Therefore, I remain of the view that 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, leading to unacceptable impacts on highway safety and the amenity of active travel users utilising the route, and would compound the existing problems that already exist, which are of particular concern during weekday network peak periods.

6.16 As such, the development is contrary to Kirklees Local Plan (2019) Policy LP21 and Policy LP24 (dii), together with National Planning Policy Framework (NPPF December 2024) policies 115-118 relating to considering development proposals and promoting sustainable development.

Appendix A - ATC Data Summary - Shepley Road & Stone Wood Lane

Appendix B - DfT – Connectivity Tool Lite Output

Appendix C - Trip Rate Extract (Table 3.1) from Storthes Hall (application reference 2023/93667) TAA Report

Appendix D - Planning Area 22: Shelley – PAA School Data (See Table C)

Appendix E – Hourly summary of Appellant's Pedestrian / Cycle / Equine Survey data

Appendix F – Plan 1 & Plan 2 - Showing visibility issues

Appendix G – Google maps journey time / distance illustration

Appendix H - Existing Informal Passing Places and Proposed Improvement Locations