



ALISTAIR FLATMAN **PLANNING**
...a **Positive** Approach



Planning Statement

Proposed Pedestrian Bridge over St Andrews Road, Huddersfield

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1.0 Introduction

- 1.1 This Planning Policy Statement has been prepared on behalf of Cummins Turbo Technologies in support of their proposed pedestrian bridge over St Andrews Road, Huddersfield.
- 1.2 The proposed bridge will provide a safe route for employees and visitors from the main buildings to the existing car park. The bridge is not accessible to the general public.
- 1.3 The proposal has been subject to pre-application discussion with the LPA, details set out below.

Background – Need for the proposed pedestrian bridge and pre-application reference 2024/20206

- 1.4 Set out below is the need / justification for the proposed footbridge together with a summary of pre-app comments and how they have been addressed in design terms.

Need for the proposal

- 1.5 At present, the Cummins Huddersfield site is spread over both sides of St. Andrews Road, a busy two-way road with moderate to high amounts of traffic during working hours. This road poses a constant risk to staff and visitors of Cummins. There is a traffic-light pedestrian crossing on St. Andrew's Road that is frequently used by members of staff and visitors of Cummins. It is not unusual for staff and visitors to use this crossing multiple times a day as part of their regular work activities.
- 1.6 Due to the amount of traffic in combination with the frequency of staff and visitors crossing the road, there is a permanent Health & Safety risk of a vehicle related incident occurring on this road, such as a collision with a person or persons.
- 1.7 Recently, a Cummins member of staff was struck by a vehicle while crossing St. Andrew's Road. This person was hospitalised and is since recovering from major injuries.
- 1.8 This incident has led to Health & Safety discussions within Cummins Turbo Technologies at high level which has led them to pursue potential solutions to eliminate the risk of crossing St. Andrews Road at road level. The current pedestrian crossings on St. Andrew's Road only serve to reduce the risk. However, as driver error and human error are constant factors, the risk will always remain.
- 1.9 The proposed solution is an enclosed steel frame footbridge over St Andrew's Road to provide safe passage for members of staff and visitors of Cummins Turbo Technologies. This solution will eliminate the need for staff and visitors to cross the road using the existing pedestrian crossings, thus eliminating the risk of another vehicle related incident happening again.

Summary of Pre-app comments and response

- 1.10 The proposed bridge has been subject to pre-application discussions with the LPA (LPA ref 2024/20206 – letter dated 1 March 2024). The LPA

response is generally supportive in principle recognising the benefits to safeguarding employment land and premises. Comment was made about design with encouragement given to deliver a 'high quality and innovative design'. With regards highways, advice was given on minimum clearance heights and the importance to consider how the proposed bridge relates to the existing (retained) pedestrian crossing – please refer to submitted Highways Statement for comment and justification picking up comments made at pre-app. The pre-app letter also sets out relevant Local Plan policies and advises on technical reports to be submitted with the application.

- 1.11 Set out below is a summary of the proposal and how it has responded to pre-app comments.
- 1.12 The architect's response to design comments made in the pre-app letter is set out below:
- 1.13 The pre-app letter commented that the bridge as submitted
"would appear as a rather stark and utilitarian feature. It would serve to close very wide ranging views towards Castle Hill – But only for a short stretch of the road."
And
"In this context I would strongly recommend that the design and appearance of any functional footbridge proposal takes the opportunity to create a 'high quality' and innovative design"
- 1.14 In response, the design of the stair and lift tower to the East has been amended to be more compact, less bulky, and less 'utilitarian' than what was submitted previously as part of the pre-application submission.
- 1.15 The latest design incorporates a large curve to the stair and lift tower which creates a 'rounding off' aesthetic to the eye. The cladding profiles are unique and serve to compliment and accentuate the curve. We believe the cladding profiles help the design to appear more 'seamless' and less bulky than what was previously submitted as part of the pre-application.
- 1.16 The supporting structure, the columns and bridge supports, have also been designed in a way to be less bland and more bespoke to further the uniqueness of the design. We believe this reflects the advanced engineering and manufacturing that Cummins provide.
- 1.17 It is also noted that the pre-app letter references closing off of views towards Castle Hill – this matter has been addressed through design and through production of CGI images demonstrating the very limited loss of views for users of St Andrews Road – this matter is addressed further in Section 3.

The Site

- 1.18 The site is located on St Andrews Road to the north of its junction with Turnbridge Road. The surrounding area principally consists of commercial and light industrial premises. The main Cummins building sits on the west side of St Andrews Road with the car park to the east side.

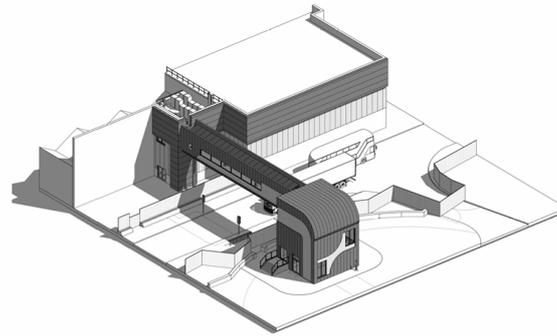
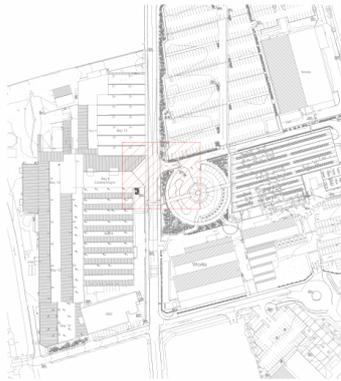
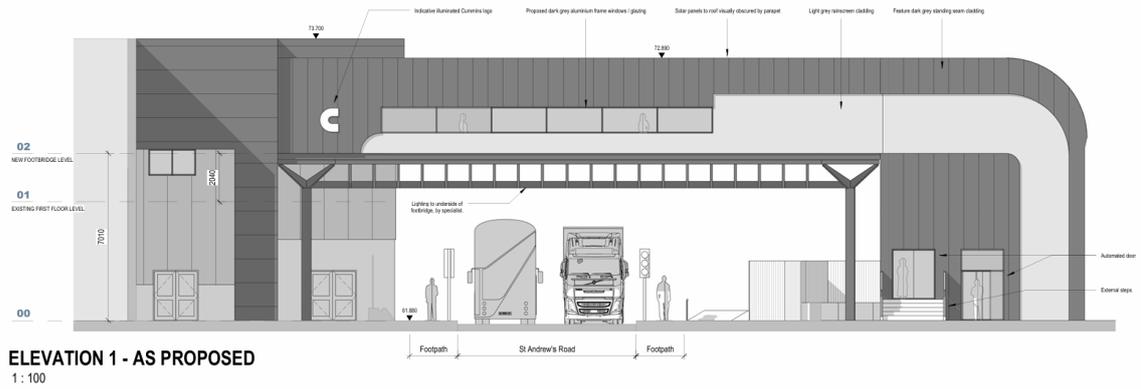
- 1.19 St Andrews Road has a 30mph speed limit although it is noted the recorded travel speeds are lower (see submitted Highways Statement).
- 1.20 The siting of the proposed bridge is within the landscaped area associated with the visitor carpark. There is a pedestrian gate in the security fencing leading to the pedestrian crossing over St. Andrew's Road. On the western side of St. Andrew's Road there is another pedestrian gate in the security fencing. This leads into a small yard area adjacent 'bay 9'.
- 1.21 The site is allocated within a Primary Employment Area in the Local Plan but not subject to any heritage, landscape or ecology designations. The site also sits with Flood Zone 2.

The Proposal

- 1.22 The proposal comprises the erection of a covered pedestrian bridge over St. Andrew's Road to span from one part of the Cummins site complex to another, for use by Cummins employees and visitors only.
- 1.23 The footbridge will include accessible stepped and cabin lift access from the visitor car park. From the East side of St. Andrew's Road all access would be from ground level. On the West side, the access to the footbridge is from first floor level with a proposed stair and platform lift.
- 1.24 On the East side, the stair tower will require alterations to the existing landscaping and hardstanding. Currently, new external paving is proposed to further the intention of the design.
- 1.25 The existing crossing will remain and there are no proposals to change the layout of the main car park.
- 1.26 Copied below is a site location / layout plan with proposed elevations

Blank – see over

Proposed Pedestrian Bridge – St Andrews Road, Huddersfield



1.27 Copied below is a CGI image of the bridge looking south – the image is taken just to the north of the car visitor park entrance / exit



The Planning Application

- 1.28 This planning application includes the following:
- Completed application form
 - Plans and CGIs – Farrar Bamforth Architecture (FBA)
 - Planning Statement – Alistair Flatman Planning
 - FRA – AVAL Consultants
 - Highways Statement – AVAL Consultants
 - Biodiversity Accounting Assessment Report – JCA
 - Phase 1 (inc CMRA) and Phase 2 Ground Reports – Rogers Geotechnical Services
 - Climate Change Proforma - FBA
- 1.29 The submitted additional technical information is considered sufficient to enable the Local Planning Authority to determine the clear merits of the proposed development.

2.0 Relevant Planning Policy.

National Planning Policy Framework 2 (December 2023)

- 2.1 The National Planning Policy Framework (revised July 2018 and updated Feb 2019) sets out the government's planning policies for England and how these are expected to be applied. The National Planning Policy Framework must be taken in to account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 2.2 Set out below is a summary and assessment of the relevant sections of the NPPF.
- 2.3 The National Planning Policy Framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. The guidance advises that the policies in paragraphs 1-231 taken as a whole constitute the government's view on what sustainable development in England means in practice for the planning system.

Achieving Sustainable Development

- 2.4 Paragraphs 7, 8 and 11 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. This includes at 8b a social objective to support healthy communities.
- 2.5 Paragraph 11 sets up the presumption in favour of sustainable development stating:

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Building a Strong, Competitive Economy.

- 2.6 Paragraph 85 is clear in terms of promoting economic development stating that decisions should help create the conditions in which businesses can invest, expand and adapt.
- 2.7 Furthermore, it goes on to advise that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 2.8 The site is unallocated but sits within an area characterised by employment / leisure / commercial uses. The economic case for the proposal is clear in that it will provide operational benefits to the applicant by providing a safe means of access for employees and customers. The proposal will therefore enable the existing business to invest and grow through investment in its facilities.

Promoting Sustainable Transport

- 2.9 Chapter 9 of the NPPF refers to highways matters with para 115 advising that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 2.10 The proposal will deliver improved pedestrian links for employees and visitors. The new bridge is to be built on private land and will not impact existing crossing or access to the car park. In order to construct the bridge, local road closures and diversions will be required. The impact of these closures / diversions have been assessed and considered that there will be no detrimental impact to the local highway network. Full details are set in the submitted Highways Statement prepared by Aval.
- 2.11 As such the development will not give rise to any highway safety or capacity issues. The proposal is therefore consistent with NPPF para 115.

Design

- 2.12 Chapter 12 of the NPPF refers to Design and advises that good design is a key aspect of sustainable development. The design of the bridge has been revised to take account of comments made a pre-app – further details are set out in the section 3. The bridge is designed to allow vehicles to safely travel beneath it with the landing area in the car park kept to a minimum to minimise impacts on landscaping and flood risk. Materials and colours for the bridge, together with its design / shape ensure the bridge is inkeeping with the larger industrial buildings belongs to the applicant.
- 2.13 Overall, the proposal would result in a well-designed scheme with benefits to visual amenity of the site through high quality design.

Meeting the challenge of climate change, flooding and coastal change

- 2.14 Paragraph 165 of Chapter 14 confirms that development should be directed to areas with the lowest probability of flooding. The site lies within Flood Zone 2 and is the application is therefore supported by a FRA. The proposed development is situated outside an area prone to surface water flooding but falls within a zone susceptible to river flooding. Despite this, there have been no recorded flood incidents in the area. Therefore, the construction of a new bridge is not expected to impact the surrounding area in terms of flood risk. Further details are found in the FRA prepared by Aval.

Conserving and enhancing the natural environment

- 2.15 Paragraph 180 of Chapter 15 advises that the planning system should contribute to and enhance the natural and local environment. The site is not subject to any landscape, heritage or ecological designations.
- 2.16 Paragraph 186 relates to ecology and biodiversity considerations when determining planning applications. There are no known protected species or ecology designations on site. As such it is considered the site is of low wildlife value. A Biodiversity Accounting Assessment Report has been prepared indicating that a greater than 10% biodiversity net gain can be achieved (refer to submitted report by JCA).
- 2.17 Paragraph 189 refers to ground conditions advising that when making decisions, consideration must be given to whether a site is suitable for its

proposed use taking account of ground conditions and any risks arising from land instability and contamination. The site is currently car park / landscaped area and building; there are no known contamination or stability issues that prevent planning permission being granted. Further details are set out in the submitted Phase 1 Ground Report and CMRA.

Assessment against NPPF

- 2.18 Assessing the proposal against the main objectives of the NPPF, it is clear the scheme accords with the overarching approach to planning in that:-
- It is supporting economic development
 - The proposal will provide a safe pedestrian access to a key local employer for employees and customers and not give rise to any highway safety or capacity issues, such that there are no adverse impacts
 - The proposal will not give rise to any flood risk / drainage issues
 - The proposal will not harm any ecological interests and provides opportunities for enhancement on site
 - As illustrated by the submitted plans, the development proposal will result in be in-keeping with its commercial / industrial surroundings in terms of design / materials and layout.
- 2.19 It is therefore considered that the proposal is wholly consistent with this national guidance. As such, the presumption in favour applies and the application should be approved.

The Development Plan

- 2.20 With respect to the proposed development, the Development Plan currently comprises the adopted Kirklees Local Plan sets out planning strategy with relevant planning policies together with an Allocations Document.
- 2.21 The Council's vision is clear in terms of promoting economic growth and development. The uses surrounding the site are a mix of employment, leisure and commercial uses even though it is not allocated / designated as such.
- 2.22 In light of the above and having regard to the proposal, the following Local Plan policies are noted:
- LP1 – Presumption in favour of sustainable development
 - LP2 – Place shaping
 - LP3 – Location of new development
 - LP8 – Safeguarding of employment land and premises
 - LP20 – Sustainable travel
 - LP21 – Highways and access
 - LP24 – Design
 - LP27 – Flood Risk
 - LP28 – Drainage
 - LP30 – Biodiversity and geodiversity
 - LP32 – Landscape

- 2.23 These policies are assessed in Section 3.

3.0 Planning Assessment

Principle

- 3.1 The site is an established employment use and is identified within the Local Plan as being a Priority Employment Area.
- 3.2 Paragraph 85 of the NPPF is clear in terms of promoting economic development whilst Policy PLP8 of the adopted Local Plan similarly seeks to safeguard existing employment uses.
- 3.3 The proposed bridge would help to 'safeguard employment land and premises' (as confirmed in the LPAs pre-app response). The pre-app response also confirmed that, in principle, there are no objections to the proposal.
- 3.4 The design and layout of the bridge reflects its use and the wider site representing economic investment to enhance an existing important local business. There are no flood risk or highways reasons to resist the proposal. Similarly, there are no heritage, landscape or ecological designations or interests on site.
- 3.5 In light of the above it is considered the proposed use is acceptable in principle complying with vision set out in the Kirklees Local Plan (Policy PLP9) and guidance set out in the NPPF encouraging economic development.

Design / Visual Amenity

- 3.6 Kirklees Local Plan Policies LP1, LP2 and significantly LP24 all also seek to achieve good quality, visually attractive, sustainable design to correspond with the scale of development in the local area, thus retaining a sense of local identity. Policy LP24 states that proposals should promote good design by ensuring:
"a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape..."
- 3.7 The footbridge is for pedestrians only and will be supported by a steel frame, the supporting structure of which will fall within the land belonging to Cummins Turbo Technologies. The footbridge will have an external cabin lift to the East side, and an internal platform lift to the West side, for accessibility purposes.
- 3.8 The design has been revised to address pre-application comments. The stair and lift tower to the East has been amended to be more compact, less bulky, and less 'utilitarian' than what was submitted previously as part of the pre-application submission.
- 3.9 The proposed design incorporates a large curve to the stair and lift tower which creates a 'rounding off' aesthetic to the eye. The cladding profiles are unique and serve to compliment and accentuate the curve. We believe the cladding profiles help the design to appear more 'seamless' and less bulky than what was previously submitted as part of the pre-application.
- 3.10 The supporting structure, the columns and bridge supports, have also been designed in a way to be less bland and more bespoke to further the uniqueness of the design. We believe this reflects the advanced engineering and



CG2 – point to north of the bridge where view is interrupted – 45m between CGI1 and CGI2



3.16 Taking the above into account, the views are interrupted for 45m out of 610m, or about 7% of the length of St Andrews Road. If you look at time (based on drivers using the road), travelling at a speed of 30mph (48kph – speed being 13.3m/sec) just over 3 seconds. However, it is noted from the Highways Statement that average speeds travelling south are 22mph (35kph – speed

being 9.7m/sec), as such the interruption to the view would be just under 5 seconds. These are negligible in terms of distance and speed.

- 3.17 As such it is considered the proposed bridge is well designed reflecting host building / business, will sit comfortably on the site and wider streetscene reflecting the industrial character of its surrounds. The interruption of views to Castle Hill are negligible such that there is no harm to views of Castle Hill. As such the proposal is consistent with Local Plan Policy 24 (Design) which seeks to ensure development proposals are of a high quality and well designed to make a positive contribution towards the character, distinctiveness and identity of a site and its surrounds. The Proposed Development will therefore deliver a high quality of design and make a positive contribution to its surroundings consistent with NPPF and Local Plan Policy PLP24.

Amenity Considerations

- 3.18 There are no nearby residents that would be impacted by the proposal. The proposed bridge brings health and safety / wellbeing benefits to employees and visitors to Cummins through provision of a safe means of access to and from the car park / operational buildings.

Highways

- 3.19 The proposed bridge will provide a safe means of access for employees and visitors to Cummins and will not adversely affect use of St Andrews Road or the existing crossing. The submitted Highways Statement demonstrates that construction of the bridge can be safely undertaken with local traffic diversions in place that would not harm highway safety elsewhere.
- 3.20 Local Plan policies PLP 20 and 21 relate to Sustainable Travel and Highway Safety respectively. The site can be safely accessed with no impact on parking to ensure there are no highways issues arising in terms of capacity or safety. 72 marked spaces will be provided to serve the proposal.
- 3.21 In light of the above, it is considered that the Proposed Development would not have an unacceptable effect on traffic flow and safety and as such will not detract from the character or appearance of the area.

Flood Risk

- 3.22 The site sits within Flood Zones 2. As such a FRA has been lodged with the application. The proposed uses are classed as 'non vulnerable' and as such there is no requirement to undertake any sequential or impact assessments. Development is well designed and does not give rise to increase risk of flooding elsewhere. As such the requirements of Policy PLP 27 and PLP 28 are met.

Biodiversity Net Gain

- 3.23 The built footprint of the proposed bridge is small. It will be located in an existing landscaped area adjacent to the car park. Opportunities exist within the proposal to deliver BNG in excess of 10%. Full details are set out in the submitted Biodiversity Accounting Assessment Report. The proposal therefore complies with Local Plan policy LP30

Summary

- 3.24 The proposed development will deliver a safe means of pedestrian access between Cummins buildings and their car park for employees and visitors. The

proposed bridge is well designed to complement to host building and deliver an interesting and attractive structure on the site. The design and materials represent high quality design and the submitted technical reports demonstrate matters relating to highways, ecology (BNG) and flood risk are all satisfactorily addressed.

- 3.25 The Proposed Development complies with the relevant national and local planning policies and as such there are no grounds to refuse this planning application.

4.0 Summary

- 4.1 This Planning Policy Statement has been prepared on behalf of Cummins Turbo Technologies in support of their proposed pedestrian bridge at St Andrews Road, Huddersfield.

Background – Need for the proposed pedestrian bridge and pre-application reference 2024/20206

- 4.2 Set out below is the need / justification for the proposed footbridge together with a summary of pre-app comments and how they have been addressed in design terms.

Need for the proposal

- 4.3 At present, the Cummins Huddersfield site is spread over both sides of St. Andrews Road, a busy two-way road with moderate to high amounts of traffic during working hours.
- 4.4 Due to the amount of traffic in combination with the frequency of staff and visitors crossing the road, there is a permanent Health & Safety risk of a vehicle related incident occurring on this road, such as a collision with a person or persons. Recently, a Cummins member of staff was struck by a vehicle while crossing St. Andrew's Road. This person was hospitalised and is since recovering from major injuries.
- 4.5 This incident has led to Health & Safety discussions within Cummins Turbo Technologies at high level. The proposed solution is an enclosed steel frame footbridge over St Andrew's Road to provide safe passage for members of staff and visitors of Cummins Turbo Technologies.

Summary of Pre-app comments and response

- 4.6 The proposed bridge has been subject to pre-application discussions with the LPA (LPA ref 2024/20206 – letter dated 1 March 2024). The LPA response is generally supportive in principle recognising the benefits to safeguarding employment land and premises. Comment was made about design with encouragement given to deliver a 'high quality and innovative design'.
- 4.7 The pre-app letter commented that the bridge as submitted

“would appear as a rather stark and utilitarian feature. It would serve to close very wide ranging views towards Castle Hill – But only for a short stretch of the road.”

And

“In this context I would strongly recommend that the design and appearance of any functional footbridge proposal takes the opportunity to create a 'high quality' and innovative design”

- 4.8 In response, the design of the stair and lift tower to the East has been amended to be more compact, less bulky, and less 'utilitarian' than what was submitted previously as part of the pre-application submission. The latest design incorporates a large curve to the stair and lift tower which creates a 'rounding off' aesthetic to the eye. The cladding profiles are unique and serve to compliment and accentuate the curve. We believe the cladding profiles

help the design to appear more 'seamless' and less bulky than what was previously submitted as part of the pre-application.

- 4.9 The supporting structure, the columns and bridge supports, have also been designed in a way to be less bland and more bespoke to further the uniqueness of the design. We believe this reflects the advanced engineering and manufacturing that Cummins provide.
- 4.10 It is also noted that the pre-app letter references closing off of views towards Castle Hill – this matter has been addressed through design and through production of CGI images demonstrating the very limited loss of views for users of St Andrews Road.

The Site

- 4.11 The site is located on St Andrews Road to the north of its junction with Turnbridge Road. The surrounding area principally consists of commercial and light industrial premises. The main Cummins building sits on the west side of St Andrews Road with the car park to the east side.
- 4.12 The site is allocated within a Primary Employment Area in the Local Plan but not subject to any heritage, landscape or ecology designations. The site also sits with Flood Zone 2.

The Proposal

- 4.13 The proposal comprises the erection of a covered pedestrian bridge over St. Andrew's Road to span from one part of the Cummins site complex to another, for use by Cummins employees and visitors only. The footbridge will include accessible stepped and cabin lift access from the visitor car park.
- 4.14 The existing crossing will remain and there are no proposals to change the layout of the main car park.

Summary

- 4.15 In summary, it is considered the proposed development comprising a new bridge associated with a well-established business is acceptable in principle given the economic benefits arising. The proposal would be consistent with policies seeking to support local businesses.
- 4.16 The design has been finessed following pre-app comments to deliver an attractive and well designed bridge reflecting the host business in terms of design features and materials / colours. Care has been taken to ensure the design and siting of the bridge minimises interruption of views of Castle Hill from users heading south along St Andrews Road. The submitted CGI images indicate that there is only a 45m length where views are interrupted (or 7% of the total 610m length where the view currently exists). In terms of traffic speeds, this 45m length equates to circa 3-4 seconds where views are interrupted. This impact is short and temporary in its duration (due to movement of users) and overall considered to be negligible. Supporting reports are lodged with the application demonstrating there are no highways, ground or flood risk issues arising whilst the proposal can deliver a greater than 10% enhancement in biodiversity.
- 4.17 In light of the above, and as demonstrated on the submitted plans and submitted reports, the proposal is consistent with planning policy set out in the

NPPF and adopted Kirklees Local Plan and does not give rise to any significant planning issues.

- 4.18 In view of the above, it is considered the scheme satisfies national and local policy and represents a suitable and sustainable development proposal for the site that addresses all the relevant and material considerations. In this context, the proposal satisfies Section 38(6) of the Planning and Compulsory Purchase Act 2004 and it is considered that planning permission should be granted.