

<b>Consultation Response from KC, Highways Development Management</b>
<b>2024/91477 Chutney Mahal, Folly Hall, Huddersfield, HD1 3PA</b>
<b>Erection of extensions and alterations to convert existing building into 32 student apartments</b>
<b>Date Responded: 19/11/2024</b> <b>Responding Officer: CNB</b> <b>Responding Ref: K6-9NW/3</b>
<p>This application is for a residential development consisting of a 32-bedroom student accommodation block with lounge, gym, cycle store (all connected with the student accommodation) and two commercial units based in an existing commercial building fronting on to A616 Folly Hall.</p> <p>A616 Folly Hall is a 30mph two way dual-carriageway main distributor road of approximately 10m width with footways on both sides and street lighting present. At the site frontage the highway has 6 lanes (3 in each direction) and is in the midst of a signalised junction with B6432 St Thomas' Road with No Waiting Mon to Sat All Day and No Loading Mon to Sat 8am to 9:30am and 4:30pm to 6:30pm TRO markings, there is a pedestrian safety barrier along the frontage of the site. There is a traffic signal safety camera located on A616 southbound on the approach to the junction.</p> <p>There are records of two injury accidents on A616 at the frontage of the proposal site within the last 5 years. We would not consider that the development proposals would be expected to exacerbate the occurrence of this type of collision in the immediate location.</p> <p>The proposal site is approximately 160m from stops on a high frequency bus route and is approximately 575m to the closest convenience store, 700m to shops and services in Huddersfield town centre and approximately 900m to the Huddersfield University main campus. The site is located in a sustainable edge of town centre location.</p> <p>The current consultation response is provided in relation to additional information submitted by the applicant in the form of a revised parking and servicing locations to deal with the highway concerns highlighted within the original response. This current response should be read in conjunction with the previous submitted HDM comments, as appended below.</p> <p>The main areas of concern as highlighted in the previous comments and pre-app guidance were the lack of parking and issues around servicing due to the location of the site adjacent to a busy signalised junction.</p> <p>The applicant has entered in to discussions with the HDM team and a resolution to the concerns has been negotiated.</p> <p><b>Waste Collection and Servicing</b> A suitable waste collection point has been identified just to the south of the signalised junction and this location has been considered by the Kirklees Waste Strategy team and is viewed as a suitable location for collecting waste from off street in the vicinity of the site. The waste collection point is approximately 50m from the proposed waste storage point although there are other closer locations, these are not as safe locations, as they are in the middle of a signalised junction. The applicant has mentioned altering the layout of the development to move the waste storage point closer to the collection point, however this would involve submitting additional drawings to be approved. The collection is to be aided by a member of staff with responsibility for taking out and returning the bins at the time of collection. This can be covered by a Waste Management and Servicing strategy plan and this can be conditioned.</p> <p>There are waiting and loading TRO restrictions along the frontage of the site on Folly Hall, as detailed above, and this would be a concern for other servicing vehicles associated with the halls of residence</p>

and the retail units. The Waste Management and servicing strategy will need to include the use of the retail units, and this should be updated with operational details when the retail units are occupied.

The second concern from HDM was the lack of on-site parking within the proposals. The type of development (student accommodation) would not usually require parking levels at standards, especially as the site is within a sustainable edge of town centre location and is within easy walking distance of the main University campus, however, some parking would be required for start and end of term drop-off and pick-up. The applicant has proposed that local public pay and display car parks can be used for this. The proposed local public car parks are the Mecca Bingo pay-and-display car park approximately 100m from the site, the Milford Street pay-and-display car park approximately 220m from the site, on street pay-and-display parking along Milford Street, the Colne Road East and West NCP pay-and-display car parks approximately 350m from the site and the Kings Bridge Road pay-and-display car park approximately 550m from the site. It is noted that there would be no guarantee of spaces at the locations and drop-off/pick-up parking would be in competition for any available spaces with other users. There are suitable and safe pedestrian facilities between each of these parking locations and the proposal site. Due to the number of public car parks within 500m, on balance, we accept this compromise to drop-off and pick-up parking.

#### Construction Management Plan

A brief explanation of the basis of a construction management plan was included within the transport statement. Due to the constraints at the site the construction management plan would be vitally important and should indicate the location of parking for staff and deliveries and materials storage on a drawing. The proposals are for materials to be stored and delivered off site and full details of this would need to be provided and this should include details of the location of the storage point, how materials would be transferred from here to the site and details of any legal agreements to use third party land. The Construction access Management Plan can be conditioned.

Deliveries should not obstruct the access to Broomfield Industrial Park and any deliveries made from A616 to the frontage of the site should be kept to a minimum and fit in with the existing TRO restrictions on loading. This should be included within the construction management plan.

#### Highway Works

Any construction deliveries to be made from the highway along the frontage of the site may need the correct street works licence and suitable traffic management and this would incur an additional charge. The deliveries should abide by the current TRO regime on loading.

The scaffolding above the footway would need a scaffolding licence and this would incur an additional charge.

In the event that a highway closure is required during the construction period this would need approval and the correct street works licence and possibly rental of the highway lane space. Again, full traffic management to Chapter 8 standards would be required for all arms of the signalised junction.

The street works licences can be obtained from [tma.permits@kirklees.gov.uk](mailto:tma.permits@kirklees.gov.uk) and we would recommend that the street works team is contacted at the earliest opportunity to arrange the issuing of permits or licences so as not to delay the works.

With this we consider that the application is now acceptable on highways grounds with the following conditions.

#### CONDITIONS

HDM recommends a suitable condition is drafted to ensure the landlord has a legal binding clause

within their lease agreement to only rent rooms within the residential premises to full time students. The condition and lease agreement to be robust to ensure the Local Authority can control and enforce the restriction on tenants.

Reasons; to restrict vehicle ownership and therefore reduce the amenity impact of any additional parking on the adjacent highway

Before development commences, details of suitable storage, bin presentation points and access and method for collection of wastes from the premises hereby approved shall be submitted to and approved in writing by the Local Planning Authority in the form of a Waste Management and Servicing Strategy Plan. The approved details shall be provided before first occupation and shall be so retained thereafter.

Reason: In the interests of amenity and highway safety and to meet the requirements set out in Local Plan Policy LP24 part d(vi).

The development shall not be brought into use until a Car Park (drop-off/pick-up) Management Statement has been submitted to and approved in writing by the Local Planning Authority. The Car Park Management Statement shall include details of:

i. Resident Liaison member of staff and contact details  
ii. Method(s) of informing resident of public parking locations in relation to the premises for drop-off and pick-up. (for example this might include leaflet, text, website, notice board etc). These details should be submitted to all residents on being appointed a room in the development but prior to their first arrival.

v. Information for guests on sustainable travel options.

vi. Mechanism for review of the Car Park Management Plan.

The development shall thereafter be operated in accordance with the approved Car Park Management Statement.

Reason: This is to ensure the site can be made safe and accessible and in the interests of highway safety, to ensure pedestrian safety and in the interests of residential amenity.

Before development commences, details of suitable cycle storage facilities shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter.

Reason: To comply with the Council's sustainability objectives and to meet the requirements set out in Local Plan Policy LP22 part g.

Prior to construction commencing, a schedule of the means of access to the site for construction traffic shall be submitted to and approved in writing by the LPA. The schedule shall include the point of access for construction traffic, details of the times of use of the access, the numbers and size of vehicles expected to access the site, the routing of construction traffic to and from the site, construction workers and delivery parking facilities, the location of materials storage and site facilities, the use of traffic management/banksman for large deliveries and the provision, use and retention of adequate wheel washing facilities within the site and the means of removal of mud and debris from the highway/footway. Unless otherwise agreed in writing by the LPA, all construction arrangements shall be carried out in accordance with the approved schedule throughout the period of construction.

Reason: In the interests of highway safety

#### FOOTNOTE

Any works within the adopted highway fronting the property will need to be constructed under the correct legal agreement of the 1980 Highways Act or Licence. You are required to consult the Design Engineer (Kirklees Street Scene: 01484 221000) with regard to obtaining this permission and approval of the construction specification. Interference with the highway without such permission is an offence which could lead to prosecution.

The street works licences can be obtained from [tma.permits@kirklees.gov.uk](mailto:tma.permits@kirklees.gov.uk) and we would recommend that the street works team is contacted at the earliest opportunity to arrange the issuing of permits or licences so as not to delay the works.

#### PREVIOUS COMMENTS (sent 21/10/2024)

This application is for a residential development consisting of a 32-bedroom student accommodation block with lounge, gym, cycle store (all connected with the student accommodation) and two commercial units based in an existing commercial building fronting on to A616 Folly Hall.

A616 Folly Hall is a 30mph two way dual-carriageway main distributor road of approximately 10m width with footways on both sides and street lighting present. At the site frontage the highway has 6 lanes (3 in each direction) and is in the midst of a signalised junction with B6432 St Thomas' Road with No Waiting Mon to Sat All Day and No Loading Mon to Sat 8am to 9:30am and 4:30pm to 6:30pm TRO markings, there is a pedestrian safety barrier along the frontage of the site. There is a traffic signal safety camera located on A616 southbound on the approach to the junction.

There are records of two injury accidents on A616 at the frontage of the proposal site within the last 5 years. We would not consider that the development proposals would be expected to exacerbate the occurrence of this type of collision in the immediate location.

The proposal site is approximately 160m from stops on a high frequency bus route and is approximately 575m to the closest convenience store, 700m to shops and services in Huddersfield town centre and approximately 900m to the Huddersfield University main campus. The site is located in a sustainable edge of town centre location.

The site is located adjacent to the A616 Folly Hall where there is a narrow safety fenced footway along the frontage of the existing building (approximately 1.9m width). This full footway should be retained at its current width, or better still improved in width due to the increase in pedestrian footfall expected by the proposals, and all doors or window fittings should open inwards and not extend on to or over the existing footway to avoid obstruction to all users. No details of the footway are shown on any of the submitted plans.

The site was provided pre-application advice/guidance as 24/20216 for 25 residential units and an initial application was submitted on 29/08 as 24/91477. This pre-app guidance and initial application comments are appended below for reference and should be read in conjunction with the current consultation response.

The current consultation response is provided in relation to additional information submitted by the applicant in the form of a revised Transport Statement and revised Block Layout to deal with the highway concerns highlighted within the original response.

The main areas of concern as highlighted in the previous comments and pre-app guidance were the lack of parking and issues around servicing due to the location of the site adjacent to a busy signalised junction.

#### Parking

A low provision of on-site parking in relation to the number of accommodation units is usually acceptable for student halls of residence as the daily operational parking and the busy drop-off/pick-up

times at the start and end of term can be easily managed to avoid the need for on-street parking and removal of congestion. However, in this case no on-site parking is proposed and the additional information submitted on Drawing No FLH-PL-005 indicates parking at two other locations, one on a private pay and display car park and the other on a private unadopted street, both of which cannot be guaranteed to have either available spaces (the on-street site looks heavily parked on streetview) or be available for parking for the lifetime of the development and because of this we cannot accept these areas as the proposed parking spaces for the development.

The Revised Transport Statement indicates that the parking and drop-off/pick-up can be managed, however we dispute this given that the parking areas are under third party control.

The application would need to show that an acceptable parking location, under the ownership of the applicant and able to be fully managed, should be provided to enable drop-off and pick-up to be accomplished safely.

It is noted that the pedestrian routing to and from the private pay and display car parking is via the pedestrian crossing route through the signalised junction and is considered to be a safe and accessible route.

The revised transport statement indicates that cycle parking will now be at 1 cycle space per unit, with 32 spaces in total provided on hydraulic double tiered bike racks and this is acceptable.

#### Waste Collection

The servicing arrangements also caused a highway safety concern due to the location of the site being within a busy signalised junction with waiting and loading restrictions.

The submitted revised Transport Statement includes proposals for the servicing and waste collection for the site. This proposes that the waste collection will be made by the same company that collects from the neighbouring industrial site and that the collection will be done from the access road in to the industrial site at the time the collection from the industrial site is made. This would be acceptable, however there is no guarantee that the waste collection company will still be operating or that the contract would not be terminated during the lifetime of the development, and this may require Kirklees waste services to take over collection.

The proposed location of the collection point would not obstruct the traffic flow or cause a highway safety concern for users of A616 Folly Hall, however a slight delay may be caused to traffic exiting the industrial site while loading takes place.

The bin storage location is acceptable as it is adjacent to the proposed collection location and within recommended drag distances.

A consultation with the Kirklees Waste Strategy team indicated that they found the waste storage and collection proposals to be acceptable and so we will acquiesce to their professional knowledge in this field. The only concern raised was with the failure of any refuse contract necessitating the collection of waste by Kirklees waste teams and the requirement to allow a refuse vehicle on to the Broomfield Industrial Park to allow collection as proposed to continue. If this cannot be arranged through a written agreement with the landowner of the industrial site, the waste collection would have to be made from the frontage of the site on A616 Folly Hall and this may have highway safety implications as it may interfere with the operation and efficiency of the traffic signals.

#### Servicing and Deliveries

There are waiting and loading TRO restrictions along the frontage of the site on Folly Hall, as detailed above, and this would be a concern for other servicing vehicles associated with the halls of residence

and the retail units.

A servicing management plan will need to be provided to include the use of the retail units, and this should be updated with operational details when the retail units are occupied. This can be conditioned.

#### Construction Management Plan

A brief explanation of the basis of a construction management plan was included within the transport statement. Due to the constraints at the site the construction management plan would be vitally important and should indicate the location of parking for staff and deliveries and materials storage on a drawing. The proposals are for materials to be stored and delivered off site and full details of this would need to be provided and this should include details of the location of the storage point, how materials would be transferred from here to the site and details of any legal agreements to use third party land.

Deliveries should not obstruct the access to Broomfield Industrial Park and any deliveries made from A616 to the frontage of the site should be kept to a minimum and fit in with the existing TRO restrictions on loading. This should be included within the construction management plan.

Due to the constraints of the site we would like to see these details prior to determination to ensure that the parking and storage can be delivered and any negotiations around the suitability of the construction access management plan and discharge of the condition would not delay the commencement of works at this later date.

#### Highway Works

Any construction deliveries to be made from the highway along the frontage of the site may need the correct street works licence and suitable traffic management and this would incur an additional charge. The deliveries should abide by the current TRO regime on loading.

The scaffolding above the footway would need a scaffolding licence and this would incur an additional charge.

In the event that a highway closure is required during the construction period this would need approval and the correct street works licence and possibly rental of the highway lane space. Again, full traffic management to Chapter 8 standards would be required for all arms of the signalised junction.

The street works licences can be obtained from [tma.permits@kirklees.gov.uk](mailto:tma.permits@kirklees.gov.uk) and we would recommend that the street works team is contacted at the earliest opportunity to arrange the issuing of permits or licences so as not to delay the works.

With this we still feel that we cannot currently support the application due to a lack of suitably detailed information relating to the full impacts of the parking, drop-off/pick-up, continued waste collection for the lifetime of the development and other servicing associated with the development on the operation of the highway network and highway safety and so wish to object on these grounds.

#### Previous Comments (sent 29/08/24)

This application is for a residential development consisting of a 32-bedroom student accommodation block with lounge, gym, cycle store (all connected with the student accommodation) and two commercial units based in an existing commercial building fronting on to A616 Folly Hill.

A616 Folly Hill is a 30mph two way dual-carriageway main distributor road of approximately 10m width with footways on both sides and street lighting present. At the site frontage the highway has 6 lanes (3 in each direction) and is in the midst of a signalised junction with B6432 St Thomas' Road with No Waiting Mon to Sat All Day and No Loading Mon to Sat 8am to 9:30am and 4:30pm to 6:30pm TRO markings, there is a pedestrian safety barrier along the frontage of the site. There is a traffic signal safety camera located on A616 southbound on the approach to the junction.

There are records of two injury accidents on A616 at the frontage of the proposal site within the last 5 years. We would not consider that the development proposals would be expected to exacerbate the occurrence of this type of collision in the immediate location.

The proposal site is approximately 160m from stops on a high frequency bus route and is approximately 575m to the closest convenience store, 700m to shops and services in Huddersfield town centre and approximately 900m to the Huddersfield University main campus. The site is located in a sustainable edge of town centre location.

The site is located adjacent to the A616 Folly Hall where there is a narrow safety fenced footway along the frontage of the existing building (approximately 1.9m width). This full footway should be retained at its current width, or better still improved in width due to the increase in pedestrian footfall expected by the proposals, and all doors or window fittings should open inwards and not extend on to or over the existing footway to avoid obstruction to all users. No details of the footway are shown on any of the submitted plans.

The site was provided pre-application advice/guidance as 24/20216 for 25 residential units and a transport statement was requested covering specific items listed in the response. This guidance is appended below for reference.

#### Trip Generation

The nature of use of the site combined with its location would not be expected, during usual use, to generate sufficient trips as to have a severe impact on the operation or efficiency of the local highway network, and so this aspect is not a concern providing the development remains for full-time student use only. We would expect some trip generation for servicing, maintenance and operation of the two retail spaces.

#### Travel Plan

The pre-application information stated that a travel plan would not be required for these proposals due to the student use, limited number of dwellings proposed, lack of parking and sustainable location, however it was noted that the Transport Statement contained a large section devoted to a travel plan. The contents of the travel plan are acceptable to promote sustainable and active travel at the site, however we would not wish to proceed with the travel plan past this point due to the very limited impacts that a TP could have with this type of development and no annual monitoring would be required.

No parking is included with the application, and this would be acceptable for student accommodation during term time, however there is a concern relating to drop-off and pick-up at the start and end of term, where no car parking is available. The site is located within the extent of a busy signalised junction, and we wouldn't want to promote any development that may lead to parking or waiting within this area as this would be a highway safety concern. The applicant would need to indicate where any parking would occur for drop-off and pick-up and how this would be managed, this may require some parking spaces added within the design of the building and a car parking management plan to cover how it will be managed. Without these details we cannot support the application. This concern also extends to the retail proposal, however the severity of the concern would be dependent of the type of

retail proposed. Further details should be provided.

There is a pay and display car park opposite the site accessed off St Thomas' Road, however there is no direct safe route from the car park to the proposal site without detouring to the far side of the signalised junction to use the pedestrian crossing facilities and we fear that any students using the direct route between the car park and site across A616 Folly Hill would be a highway safety concern (the highway is 6 lanes wide at this location with a very narrow kerbed central reserve).

Cycle parking is proposed within the development, and this should be at one space per unit to be acceptable based on local parking guidance, it is noted that the D&A Statement and states that 15 bikes will be provided, it is not sure if this is referring to cycle parking or a provision of cycles for residents use and this should be clarified. Very few details of the cycle parking were provided. A diagram within the design and access statement shows a two-tier cycle storage rack and this would be acceptable, however we would need to see that a suitable amount of these can be accommodated with sufficient space for removing cycles safely from the racks.

#### Servicing

No details were provided relating to the servicing or waste collection from the premises. A bin store is indicated on drawing No FLH-PL-003 to the front of the building with a door opening out on to A616 Folly Hill, however this is located within the outer boundaries of the traffic signals adjacent to the southbound stop line on A616 and would be over the traffic detector loops. Any service vehicles waiting in this location are liable to cause an obstruction of the traffic signals, causing them to become inefficient, and a highway safety concern as queuing vehicles may wish to manoeuvre around them and will also obstruct the exit lane from the Broomfield Business Park. It is noted that the approach to the signals along A616 Folly Hill has waiting and loading restrictions, and these may impact upon servicing at the site.

We would need to see a suitable servicing management plan that explains how servicing to the development, including waste management, will be carried out without causing an obstruction to the signalised junction before we could support the current application.

Details of waste management and waste servicing should be approved by the Kirklees Waste Strategy team. The waste management for the residential and retail uses should be clearly divided as they will create different types of waste, with the student apartments being residential and the retail being commercial waste.

#### Construction Access Management Plan

Due to the location of the site, close up against a busy A-class main distributor road we would also like to see a construction access management plan explaining how access will be made to the site, the numbers and types of vehicles expected at the site, on-site parking for contractors vehicles and deliveries, location for storage of materials and site facilities and wheel washing facilities to stop mud or debris from being dragged on to the adopted highway for road safety reasons. This should cover all aspects of the development including demolition and build phases.

With this we cannot currently support the application due to a lack of suitably detailed information relating to the full impacts of the development on the operation of the highway network and highway safety and so wish to object on these grounds.

Pre-Application Highways response (sent 07/03/2024)

This is pre-application highways advice for a residential development consisting of a 25-bedroom student accommodation block with lounge, gym, cycle store (all connected with the student accommodation) and two commercial units based in an existing commercial building fronting on to A616 Folly Hill.

A616 Folly Hill is a 30mph two way dual-carriageway main distributor road of approximately 10m width with footways on both sides and street lighting present. At the site frontage the highway has 6 lanes (3 in each direction) and is in the midst of a signalised junction with B6432 St Thomas' Road with No Waiting Mon to Sat All Day and No Loading Mon to Sat 8am to 9:30am and 4:30pm to 6:30pm TRO markings, there is a pedestrian safety barrier along the frontage of the site. There is a traffic signal safety camera located on A616 southbound on the approach to the junction.

There are records of two injury accidents on A616 at the frontage of the proposal site within the last 5 years. We would not consider that the development proposals would be expected to exacerbate the occurrence of this type of collision in the immediate location.

The proposal site is approximately 160m from stops on a high frequency bus route and is approximately 575m to the closest convenience store, 700m to shops and services in Huddersfield town centre and approximately 900m to the Huddersfield University main campus. The site is located in a sustainable edge of town centre location.

For the application we would require a transport statement that covers the following points.

#### Trip Generation

Due to the sustainable location and no on-site parking to be included, the vehicular trips to the site are expected to be very low and would consist essentially of servicing trips.

#### Parking

Due to the sustainable location and type of proposal (student accommodation) we would not insist on any on-site parking. However, we do have a concern relating to the drop-off and pick-up at the start and end of term and would like to see a managed location for this to occur in as use of the highway adjacent to the proposal site would not be acceptable due to highway safety concerns. A parking management plan may be required to cover drop-off and pick-up at the site.

#### Cycle Parking

This is indicated on the drawing and is noted as being for 25 cycles, however exact details of the storage and the types of stands to be included will be required. The failure to provide safe and secure cycle parking or the use of unsuitable stands that may cause damage to cycles may discourage residents from using cycling as a transport mode and this may go against Kirklees sustainable travel policy.

#### Waste and Recycling bin storage and collection

A waste storage location is indicated on the submitted drawing to the front of the development with an access opening directly on to A616 Folly Hill. We would recommend that any waste storage is done to standards and guidance provided within the Kirklees Waste Strategy team guidance document, which can be found at <https://www.kirklees.gov.uk/beta/planning-applications/pdf/waste-management-design-guide-new-developments.pdf> . We have also asked our colleague in Waste Strategy to provide comments and these will be forwarded as soon as they are available.

#### Servicing

We would like to see details of how servicing for the site will be operated, given that there is no street frontage available due to the location of the signalised junction. We wouldn't like to see any servicing occurring from A616 within the traffic signals for highway safety reasons. It is noted that previous

iterations of the proposals for residential units included an under-croft servicing area, but this has been removed from the current plans, presumably due to use of the existing building. A separate servicing management plan may be required, and this may need to include the commercial units.

The Parking and servicing management plans may be combined if required.

Unless the drop-off/pick-up and servicing concerns are not addressed we may be forced to object to the proposals on highway safety grounds.

#### Sustainable Travel

We would not request a formal Travel Plan for the site due to the low number of bedrooms and lack of on-site parking, however we would appreciate the submission of a travel plan statement (this may be included within the transport statement) that indicated how sustainable travel use and information will be promoted to the residents to encourage the use of sustainable and active modes of travel to fit in with Kirklees sustainable travel policies. We would not wish to have any annual monitoring carried out.

#### Footnotes

It is the applicant's responsibility to find out whether the work approved by this planning permission requires written approval from the Highways Structures section for works near or abutting highway and any retaining structures. Contact Farhad Khatibi (structures team leader 01484 221000) at the earliest opportunity, who will be able to advise you of the necessary requirements in more detail.

Any works within the adopted highway fronting the property will need to be constructed under the correct legal agreement of the 1980 Highways Act. You are required to consult the Design Engineer (Kirklees Street Scene: 01484 221000) with regard to obtaining this permission and approval of the construction specification. Interference with the highway without such permission is an offence which could lead to prosecution.