

**Consultation Response from KC,
Highways Development Management****2024/93156 Healey Lane Mills, Healey Lane, Healey, Batley, WF17 7SH****Outline application for redevelopment of existing Islamic Centre****Date Responded: 11/07/2025****Responding Officer: CNB****Responding Ref: K13-6SW/1**

This is an outline application with access, appearance, layout and scale for the partial demolition of a mill building, part change of use to community uses and the building of a mosque/madrassa with parking and access on to B6123 Healey Lane, a 30mph two-way single carriageway secondary link road of approximately 9.3m width with footways on both sides and street lighting present.

B6123 Healey Lane hosts a medium frequency bus route and there are stops within 160m of the centre of the site.

Highway safety engineering works on Healey Lane in the vicinity of the site to incorporate traffic calming and parking restrictions in the form of No Waiting at Any Time TRO markings on the side of the development have recently been installed. The Kirklees Highway Safety team have suggested that a formal crossing should be incorporated in to the proposed safety designs to allow a safer crossing over Healey Lane for attendees of the mosque/madrassa who are arriving on foot. This would require a contribution of approximately £120,000 from the applicant to incorporate this formal pedestrian crossing in to the current proposals. This should be added as s278 works funded by the applicant.

There are six recorded personal injury collisions (PIC) on the highway network in the vicinity the site over the past 5 years, however none of these would appear to be caused by reasons that would be exacerbated by the proposals.

The proposals are to demolish existing industrial units and erect a mosque/madrassa with car parking with a one-way vehicle circulation with separate entrance and exit access points on to B6123 Healey Lane. The existing mosque/madrassa building will be retained and transformed into community use buildings and facilities for the madrassa. The new facilities will have an increase in worshipers from 150 to 252 and an increase in pupils from 60 to 120, a combined increase of 77%.

The application is accompanied by a Transport Statement dated August 2024 and a Travel Plan also dated August 2024. A subsequent Highways Technical Report was submitted along with the results of the initial parking surveys carried out on Friday 4th April 2025.

Trip Rates

A survey of the current trips generated by the site and one from a similar local site have been provided with the application and the existing site survey has been used to generate a trip generation rate for the proposed development. This was a total of 127 pedestrian trips at the highway peak hour (4:45pm – 5:45pm). These trips have been multiplied by the increase in the numbers of worshipers and pupils (77%) to provide a future number of trips during the highway peak of 225 pedestrian trips.

The trip rates obtained for the nearby Jame Masjid Mosque are approximately half that of the ones obtained for the existing use at the application site. Within the Transport Statement it is suggested that this may be due to the increase in capacity influencing the way trips are carried out, with more shared trips. However, it should be noted that these figures are based on pedestrian trips not vehicle occupancy and it is more likely that there are lower occupancy percentages at the bigger mosque than at the

smaller one causing this difference in pedestrian trip rates.

A vehicular trip generation was undertaken as part of the initial application, based on the existing car park arrivals and departures and from video evidence of on-street drop-off and pick-up numbers on Healey Lane. During the highway peak this totalled 61 trips (20 vehicles using the car park and 11 as on-street drop-off). The matched arrival and departure numbers within the hour from the car park may indicate that the majority of the vehicles accessing the car park were for drop-off purposes and not parking, as would be expected with a school-based use. This was not carried out on a Friday and so did not catch the bust Friday prayers peak. A subsequent survey was carried out to cover access and car parking on a Friday as part of the wider area initial car parking survey.

A survey of the existing commercial/industrial areas of the site was also carried out prior to the car parking survey and this amounted to 23 two-way trips from the site. These can be used as a discount from the existing site trip generation as this land use will no longer commence with the development proposals and based on the proposed increase of 77% with the existing commercial aspect discounted, the net increase in trips during the evening peak hour is calculated to be approximately 24 two-way trips. We would not consider that this number of additional trips would have a severe impact on the operation or efficiency of the local highway network.

A further initial car parking survey was carried out on-street in the surrounding area on Friday 4th April 2025, including a car park survey of the use of the existing car park and a count of users/worshippers using the existing premises. This was based on an approved brief and is acceptable.

Our main concern with trip rates wouldn't be the impact of the additional traffic on the efficiency of the highway network but on the parking demand that the trips would generate, and this is discussed below.

Access

Two vehicular accesses are proposed, with an in/out circulation system through the car park proposed. The in access would be to the west of the proposal site while the out access would be to the east of the site. Both access points are existing but would undergo improvements. Any changes to the accesses would need to be carried out under the appropriate legal agreement with the local highway authority, either a s184 or a s278 agreement depending on the level of the changes/improvements required.

The site proposals are currently part way through a Stage 1 Road Safety Audit process and results will be analysed when they are produced.

The one-way system should be clearly marked with either "ENTRY" and "EXIT", "IN" and "OUT" or arrow markings and this should be conditioned.

Visibility splays for the access points were provided in drawings No 21/382/TR/006 Rev C and 21/382/TR/008 Rev C. These were from Manual for Streets calculations based on 85th percentile speeds obtained from ATCs set up at either side of the proposal site and are acceptable.

A swept path analysis was provided on drawing No 21/382/ATR/002 Rev B for an 11.85m refuse wagon and this is acceptable.

Parking

The proposals are for a 59-space car park to be provided with the development as two surface car parks

to each side of the building and an under-croft parking area. The under-croft section consists of 14 EV charging spaces and 4 accessible spaces. The spaces scale to approximately 2.4m x 4.8m and therefore would be acceptable within standards.

The proposals are for approximately 372 users, although it is assumed that the majority wishing to park would be worshippers (252) with the pupils being dropped-off and picked-up rather than parents/guardians parking for the duration of the classes. This would still equate to just over 4 worshippers per space if the madrassa was not operating during the busiest times for prayer.

A car parking accumulation assessment was not submitted with the application and so one was carried out using the observed trips and the proposed increase in use of the site.

Using the submitted trip generation for the madrassa growthed to the proposed use levels, the proposed car park is suitable, however this would be expected as most trips would be drop-off/pick-up where the dwell time within the car park would be very low, meaning that a large turnover of spaces would be obtainable.

A problem may occur with use of the car park by worshippers where the dwell times would be expected to be longer and so turnover would be much lower and with a higher parking demand the car park is expected to reach capacity leading to an increased demand for on street parking.

No trip generation details were provided with the initial submission for Friday prayers when we would expect car park demand to be at its highest and so the national TRICS database was used to obtain a trip rate. When based on a GFA of 2059sqm (as quoted in the application form) and 59 car parking spaces, the car park was shown to be over capacity during the busiest prayer times, with a maximum demand of over 4 times the car park capacity. Obviously, this is based on the full GFA of the proposals and not just the prayer hall and so would give a worst-case scenario.

Car parking demand details were provided with the April 2025 parking survey, and this suggested that the car parking demand was approximately 0.507 parking spaces per worshipper. This is considered acceptable for a base to obtain the full parking demand for the proposals and a similar calculation would be expected when the survey is repeated 12 months after full occupation.

The parking demand figure would calculate to a proposed future parking demand of approximately 128 spaces. The Highways Technical Report then discounted this by 10% based on the wished for reduction in single occupier car trips within the Travel Plan, however we feel that the inclusion of this 10% discounting may be premature as a final Travel Plan and the initial travel plan survey targets have not been arranged yet (and cannot be arranged until the initial user travel survey is carried out after full occupation of the building. Of this 128-space demand, 59 will be contained within the proposed car park (possibly a slightly higher figure if parking marshals are employed and “stacking” can be achieved within the car park). This would mean that approximately 69 parking spaces would be required on the highway network surrounding the site.

Due to the proposed No Waiting At Any Time/No Loading TRO on Healey Lane adjacent to the site then it is expected that this additional parking demand would extend further into the surrounding residential streets.

The Kirklees highway safety team have expressed a concern that the overflow parking would be

displaced on to residential streets around the development site where existing obstruction and highway safety issues have been recorded, specifically Linton Avenue and Healey Lane. They have requested that the applicant contributes to a before and after parking survey to be carried out in the local area to ascertain the impacts of the proposals on parking in the surrounding residential streets and to fund any further restrictions deemed necessary. A fully scoped initial parking survey was carried out on Friday 4th April 2025 and covered the entire area to the west of the site along Healey Lane and West Park Road as far as (and including) West Park Grove, Trafalgar Street (as far as its junction with Throstle Nest), Nelson Street, Holyoake Avenue, Alder Mews, Linton Avenue, Malham Drive, Hayburn Road, Throstle Nest and Woodhall Drive. A second parking survey should be carried out, again on a Friday, after the development has been fully occupied for 12 months and should follow the previously agreed scope. The comparison between the two surveys will then form the basis of an assessment of the parking impacts of the proposals and suitable mitigation requested.

The costs of the mitigation works will only be able to be provided when any issues and concerns have been fully identified through the “after” survey, however for reference the current cost for a TRO is £6775 each plus the costs of the lining and signing costs but this is subject to an increase annually at the start of the financial year. We would request that £10,000 is procured within the s106 agreement to fund the costs of any proposed TROs and lining/signs costs. This survey and the mitigation costs should be conditioned with any unused mitigation cost monies being within a claw-back scheme, the details of which should be incorporated within the s106 agreement.

The transport statement suggests that a Car Park Management Plan will be put in place for the operation of parking on the site and we would support this action. The plan should cover details of the operation of the car park for all times, covering prayer times, madrassa times and parking associated with the communal uses of the existing site to be retained. It should provide contact details of a member of staff to provide a liaison with local residents, cover the use of parking attendants/marshals for busy times, the occasional need for “stacking” to fit in greater numbers of vehicles than the marked car park would take for during busy times, the use of marshals to deter illegal or unsocial on-street parking, the provision of parking and alternative/sustainable travel modes information for all users of the site, and a mechanism for review of the Car Park Management Plan. This should be conditioned.

Travel Plan

An Interim Travel Plan was submitted as part of the application, and this is acceptable as an interim travel plan. The TP suggests an initial mode shift from single occupancy vehicle use to sustainable modes of 10% and this is acceptable for an initial target and may be adjusted when the initial occupier surveys are carried out.

The objectives, measures and action plan are all acceptable for an interim Travel Plan. It is noted that Bryan G Hall have been appointed as Interim Travel Plan Co-ordinator and this is acceptable. The name and new contact details of a permanent TPC should be forwarded to the LPA as soon as this appointment is made.

We would request that 5 annual surveys are carried out after the initial occupation survey and that the monitoring reports are submitted to the LPA for assessment and written approval, for this there will be a charge of £2,000 pa for the 5 years of surveys (total of £10,000) and this should be included as part of the s106 agreements.

The transition from interim travel plan to full travel plan should be conditioned with monitoring for 5

years after the initial travel survey included within a s106 agreement.

Construction Access Management Plan

Due to the location of the site on the route to a primary school and the possible existing madrassa use taking place during the early stages of development, we would like to see a construction access management plan provided with the application. This should give details of the times of access to the site, types, sizes and approximate numbers expected to visit the site, details of parking for contractors and deliveries including a turning space so they can enter and exit the site in forward gear, the location of materials storage and site facilities, the use of a banksman and details of highway management for large deliveries that can't access the site and the use and retention of wheel washing facilities to avoid mud and debris from becoming dragged on to the adopted highway for road safety reasons. A construction Management Plan was mentioned in the TS (paragraph 5.10) but no details were included. This can be conditioned and should include all phases of the demolition and construction process.

Landscaping is retained as a reserved matter, and we would like to be invited to assess the landscaping details when they are submitted at reserved matters to ensure that they would have no detrimental impact on highway visibility and highway safety.

With this, and providing that any RSA issues are suitably resolved, we consider that on balance the outline application proposals are acceptable on highways grounds with the following conditions.

Conditions

Prior to commencement a traffic survey shall be undertaken on Healey Lane and West Park Road as far as (and to include) West Park Grove, Trafalgar Street (as far as its junction with Throstle Nest), Nelson Street, Holyoake Avenue, Alder Mews, Linton Avenue, Malham Drive, Hayburn Road, Throstle Nest and Woodhall Drive, submitted to and approved in writing by the Local Planning Authority. This parking survey shall be repeated approximately twelve months after the Mosque/madrassa is brought in to use and be submitted to, and approved in writing by, the Local Planning Authority, together with a schedule of any mitigation measures considered necessary to mitigate the impact of associated development traffic, identified between the two surveys, with timescales for implementation. Unless otherwise agreed in writing the approved mitigation measures shall be implemented and retained in accordance with the approved timescales.

Reason: To ensure the proposal's impact upon the local highway network is appropriately assessed and mitigated against, in the interest of Highway safety and efficiency, to comply with the aims and objectives of Policy LP21 of the Kirklees Local Plan.

Prior to development commencing, details of a scheme to introduce pedestrian crossing facilities (humped zebra crossing) across B6123 Healey Lane, with timescales for implementation, shall be submitted to, and approved in writing by, the Local Planning Authority. Unless otherwise agreed in writing the pedestrian crossing facilities shall be implemented and retained in accordance with the approved timescales.

Reason: In the interests of highway safety and to allow for safe pedestrian access to and from the site.

Before the development is brought into use the ingress and egress shall be signed and lined with suitable markings in accordance with with details that have been approved in writing by the Local

Planning Authority. The signs and lining approved shall thereafter be retained.

Reason: In the interests of highway safety and to achieve a satisfactory layout

The development shall not be brought into use until a Car Park Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Car Park Management Plan shall include details of:

- i. Resident Liaison member of staff and contact details
- ii. Operation of the car park including expected times of operation
- iii. Car park attendant/s and marshals
- iv. The overflow parking plan
- v. Information for guests on travel options and booking system for parking spaces.
- vi. Mechanism for review of the Car Park Management Plan

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

Reason: This is a pre-commencement condition 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.

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

Footnotes

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.