

**Planning Application for Redevelopment of Site to  
include Light Industrial Units, Prefabricated Offices  
and Waste Transfer Station Shed**

**Owler Lane, Birstall, Leeds WF17 9BW**

**Transport Statement**

**Foxhall Environmental Ltd**

April 2025

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**Status: FINAL**

# 1. Introduction

- 1.1 Foxhall Environmental Ltd is a waste recycling company that operates a small waste transfer facility located on the northern outskirts of Birstall, Kirklees close to the M62. The site in total extends to approximately 0.62 ha ( approximately 1.5 acres) and comprises an area of hardstanding for storage of waste, skips and vehicles a few old agricultural buildings in industrial use and open storage.
- 1.2 The company is seeking planning permission to redevelop its site by removing the current buildings and replacing them with three small light industrial units that will offer flexible accommodation for commercial and light industrial tenants. In addition, the existing waste management operations are all undertaken outside in the open. The intention is to construct a small Waste Transfer Shed to enable the bulking of waste and some element of sorting of waste to take place at the site.
- 1.3 The current waste site includes an old two-storey prefabricated office. The intention is to provide a replacement office for the staff on site.
- 1.4 There is also an option to provide secure storage within part of the redevelopment of the site
- 1.5 In accordance with the Planning Practice Guidance 'transport evidence bases in plan making and decision taking' this Transport Statement addresses key transport issues, including:
- the local highway network
  - the access arrangements to the proposed development
  - review of the proposed development and its operational facilities
  - the impact of the development on the local highway network. In terms of highway safety
  - accessibility of the site in relation to sustainable transport and local facilities

# 2. Planning policy

## **National Planning Policy**

- 2.1 in December 2024 a new National Planning Policy Framework (NPPF) was published, which sets out the government's planning policies for England and how these are expected to be applied. This NPPF replaces the previous version and the original document produced in March 2012.

2.2 NPPF paragraph 116 states that:

*Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*

### **Local Plan Policies**

2.3 The proposed redevelopment of the site is consistent with the objectives of the Kirklees Local Plan (adopted February 2019), which sets out the strategic framework for sustainable growth in the district to 2031. The following policies are of particular relevance to transport and accessibility considerations;

#### **Policy LP1 – Presumption in Favour of Sustainable Development**

2.4 This overarching policy supports proposals that contribute positively to the economic, social, and environmental dimensions of sustainable development. The development promotes economic activity in a sustainable location within Birstall and makes efficient use of previously developed land.

#### **Policy LP20 – Sustainable Travel**

2.5 LP20 encourages development that supports sustainable travel choices and reduces the need to travel by private car. The site's location within Birstall provides access to existing public transport routes and active travel infrastructure, helping to reduce reliance on car travel for workers and visitors.

#### **Policy LP21 – Highway Safety and Access**

2.6 This policy requires developments to be designed to ensure safe and efficient access for all users, including pedestrians, cyclists, and vehicles. The proposed scheme includes an appropriate internal layout, adequate servicing provision, and compliant visibility splays to ensure safe access to and from the highway network.

#### **Policy LP22 – Parking**

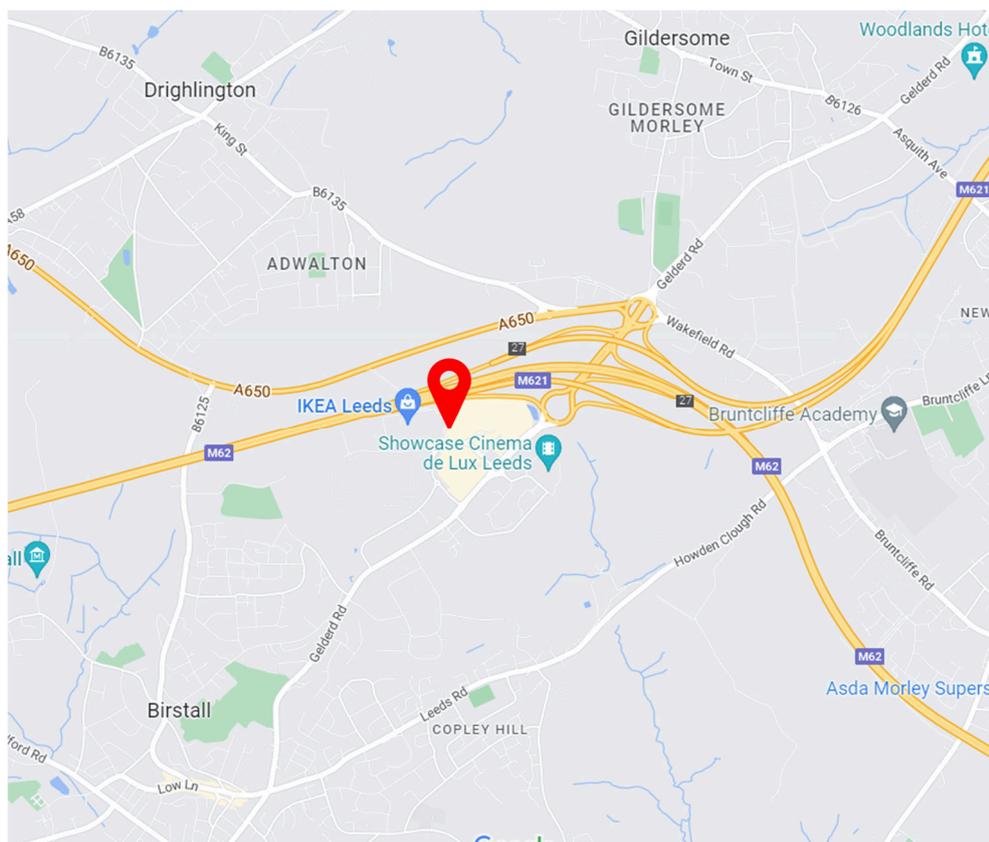
2.7 LP22 sets out expectations for parking provision, including for vehicles and cycles, based on the scale and type of development and local accessibility. The proposed scheme provides on-site car and cycle parking in accordance with Kirklees Council's standards, taking into account operational needs and sustainable travel targets.

#### **Policy LP31 – Strategic Transport Infrastructure**

- 2.8 This policy supports proposals that improve connectivity and reduce congestion. The development, which makes use of an existing access and supports employment use without generating significant new traffic, aligns with this policy by contributing to local economic growth with minimal transport impact.

### 3. Site Location

- 3.1 The site is located off Owler Lane which is itself accessed via the B6125 to the west of the site. The centre of the site is located at OS grid reference SE 22776 27631. It is located approximately 1.3 km north of the centre of Birstall and less than 1km from Junction 27 of the M62, where it joins with the M621.
- 3.2 Owler Lane is a narrow unclassified road that originally led to Gelderd Road to the east but which is now stopped up just past the access point to Foxhall Environmental's site.



- 3.3 The site is located within an industrialised area. To the west and south is a complex of small industrial units. To the east lie a number of large industrial units and factories which lie on the outskirts of the Junction 27 retail park.

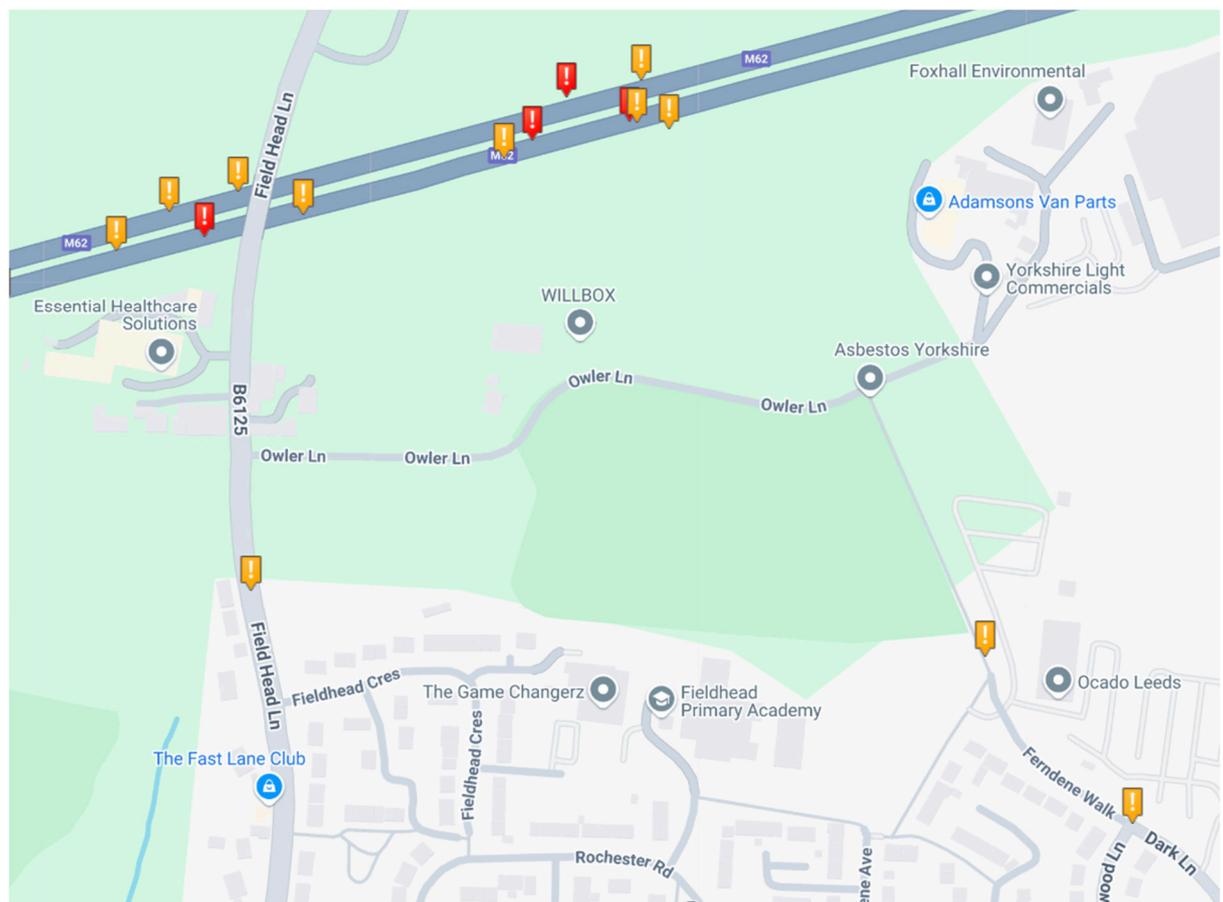
### Existing Highway Network

- 3.4 The site is located at the end of Owler Lane – the lane continues past the site entrance, but is blocked up for all traffic. The lane is a single track highway with passing places which is accessed off the B6125 Field Head Road.
- 3.5 Field Head Lane travels in a north-south direction. Heading north, the road passes a few residential properties and small commercial business estate before crossing over the M62. Approximately 470m north of the Owler Lane junction, Field Head Lane connects to the A650, that provides access to junction 27 of the M62.
- 3.6 Heading south from the Owler Lane junction, Field Head Lane leads to Birstall, past a residential area of the town.

### Personal Injury Accident Data

- 3.7 Details of personal injury accident records in the vicinity of the site have been obtained from the online Crashmap database for the most recent 10-year period. The study area takes in Owler Lane, Field Head Lane and the M62.

**Fig 1 – Crashmap extract**



- 3.8 There have been several recorded incidents within the study area, however, all but one relate to accidents on the M62.
- 3.9 The single incident recorded on the local highway network was located approximately 100m south of the Owler Lane junction with Field Head Lane. The incident occurred 7 years ago on 19 November, 2017 and involved 3 vehicles, where a car hit another car before striking a parked car. Only minor injuries were recorded.
- 3.10 With regards to the location of the development site:
- no incidents of any injury severity have been recorded at or in close proximity to the site access in over 10 years.
  - Only a single incident has been recorded over a 10 year period in the area, which was classed as a minor accident.
  - All the vehicles involved cars.
- 3.11 There were no recorded incidents in proximity to the application site, involving HGV movements.
- 3.12 A copy of the Crashmap accident record is provided in Appendix xxx.

## 4. Accessibility by Non-car Modes

- 4.1 This section of the report considers the accessibility of the proposed development site for the following modes of transport in order to review opportunities that will exist for employees.
- Accessibility on foot
  - accessibility by cycle
  - accessibility by bus, and
  - accessibility by rail

### **Accessibility on foot**

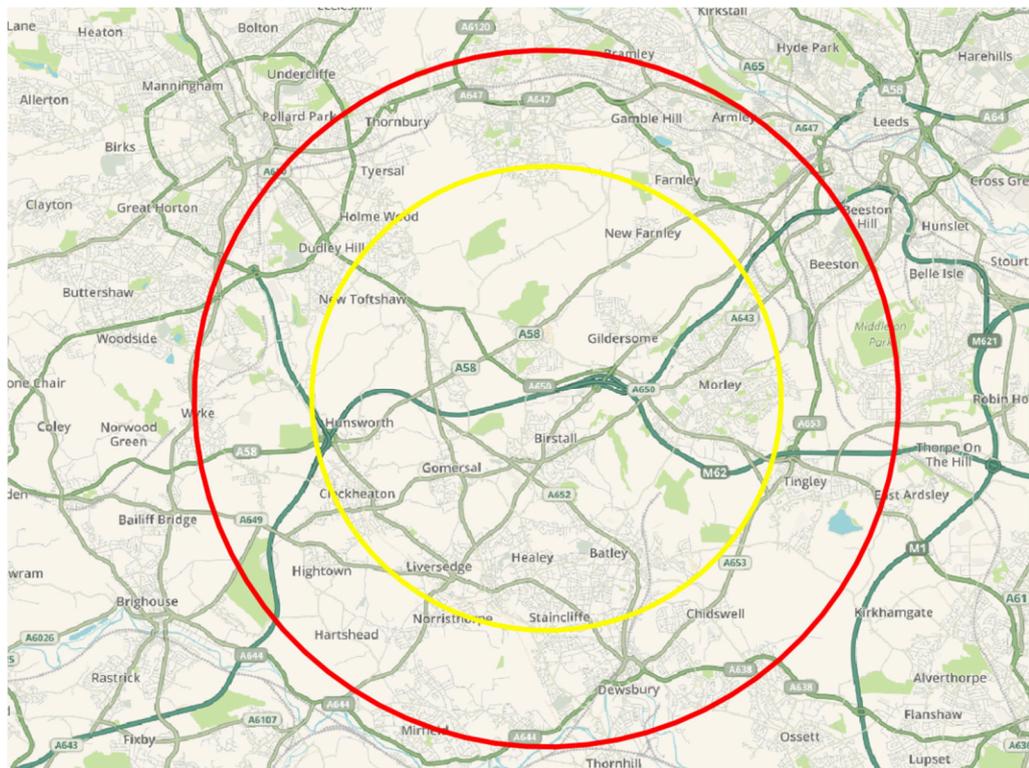
- 4.2 Walking is the most common form of travel in Britain and have the greatest potential to replace short car trips, particularly those under 2 km.
- 4.3 It is important to consider the routes that will be taken in order to get to a destination as well as the distance. Department for Transport and guidance 'Building Sustainable Transport into New Developments' (2008) gives the following advice:



which has personal benefit, as well as economic benefits for the nation in terms of health service costs. The bicycle is generally more affordable than the car and its there are social equity benefits relating to the promotion of cycling. Cycling may also other people without cars to reach destinations they may otherwise be able to reach.

- 4.8 It is indicated in the PPG13 (2001) that 'cycling has the potential to substitute for short car trips, particularly those under 5km and form part of a longer journey by public transport'. Notwithstanding this, however, 'Building Sustainable Transport into New Developments' (2008) identifies that people may be willing to walk or cycle for whether surroundings are more safe and stimulating. In addition, the National Travel Survey identifies longer cycle journeys more than 5 km with an average distance of 5.3 km and an 85<sup>th</sup> percentile distance of 7.4 km.

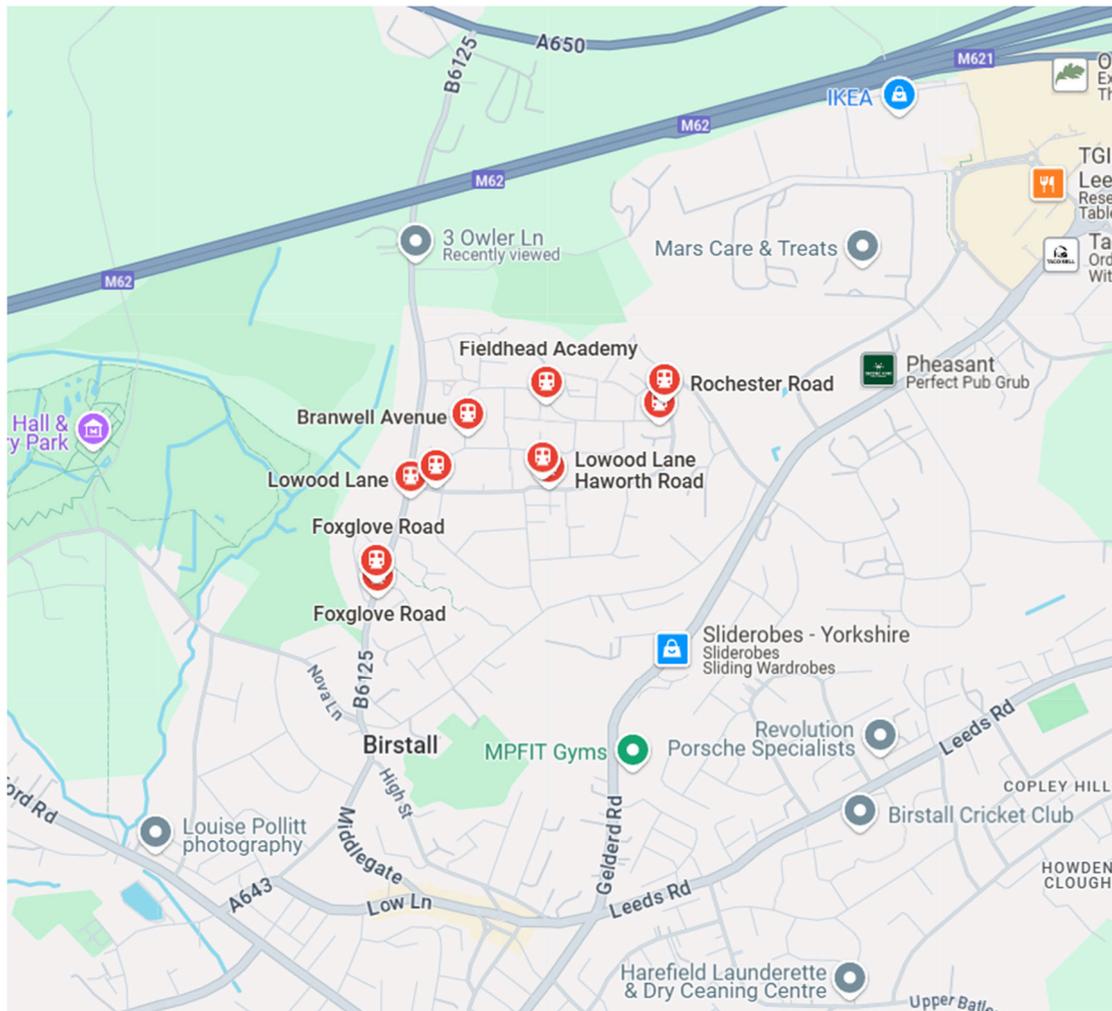
- 4.9 **Figure 3** below indicates the destinations that lie within a 5 km and 7.5 km radii of the application site.



- 4.10 As with walking, cycling will not follow simple radius shown on the plan is provided in order to give an indication where destinations lie and the general extent to which the site may be accessible by cycle.

#### Accessibility by Bus

- 4.11 The location of bus stops within the vicinity of the site are set out on **Figure 4** below:



- 4.12 The nearest bus stops are located on Rochester Road within the Fieldhead residential estate. There is a good frequency of buses (approximately every 30 minutes) running along the route where the bus stop lie. The earliest pick-up is 5:45 AM, and the last being 6:00 PM which should be satisfactory for the anticipated hours operated by the industrial estate businesses.

#### **Accessibility by Rail**

- 4.13 The nearest railway stations are located in Batley and Morley, both have good links to public transport but are approximately 1 hour journeys by bus from each station to the nearest bus stop, which may be problematic. Both routes involve a 5 minute walk to the site, which may disadvantage some potential visitors/staff at the site.

#### **Accessibility Summary**

- 4.14 The site is considered to be reasonably accessible by foot from Birstall and nearby residential areas. The site is also considered to be accessible by cycle with good infrastructure provision in the area. There is a bus stop within walking distance of the site.

- 4.15 It is considered that the site will be accessible by sustainable travel options for employees living close to the site (within 7.5 km).

## 5. Development Proposals

- 5.1 The intention is to replace the existing poor-quality and dilapidated buildings within the site with modern units capable of providing valuable usable commercial workspace. In addition, the development proposes a small Waste Transfer Station to enable a wider range of wastes to be handled within the existing waste management operations, which are currently all undertaken in the open.
- 5.2 The development also provides for an area of secure storage. This will house a number of secure metal iso-containers for individuals to rent. The containers will be stacked a maximum of two high.
- 5.3 Parking for staff and visitors will be provided, with the number of dedicated parking bays in accordance with the Local Plan guidance.
- 5.4 It is anticipated that most operations will take place at the site within the following hours (in line with existing hours at the site)
- 0600 hrs to 1800 hrs Monday to Friday,
  - 0600 hrs to 1400 hrs Saturday, with no operations on Sundays or Bank/Public Holidays

## 6. Traffic Impact Assessment

### Staff, Visitors and Suppliers

- 6.1 The application site is located at Foxhall Environmental, off Owler Lane, Birstall. The site forms part of an established employment area and is currently occupied in part by an operational waste transfer station, which will remain in use. The proposed development comprises:
- Three small light industrial units
  - An office building associated with the waste transfer operation
  - A secure storage area

### Access

- 6.2 The site is accessed from Owler Lane, a short cul-de-sac serving the wider estate. Owler Lane connects to Field Head Lane, which provides direct access to the A650 Bradford Road, located approximately 400 metres to the east. The A650 forms part of the local primary route network and connects to the M62 (Junction 27) approximately 1km to the south-east, enabling convenient access to regional destinations including Leeds, Bradford and Wakefield.
- 6.3 The existing access to the site will be retained. It benefits from sufficient visibility splays in both directions and can safely accommodate light goods vehicles, small HGVs, and staff vehicles.

### Parking Provision

- 6.4 The site will provide 23 car parking spaces, including 3 disabled bays, allocated as follows:
- Unit A: 5 spaces
- Unit B: 5 spaces
- Unit C: 4 spaces
- Office (waste operations): 9 spaces
- 6.5 Standard bay dimensions of 5.0m x 2.5m will be used throughout. Turning areas have been designed to ensure safe on-site manoeuvring for delivery vehicles and emergency access.

### Operational Hours

- Monday to Friday: 06:00 – 18:00
  - Saturday: 06:00 – 13:00
  - Sunday/Bank Holidays: Closed
- 6.6 These hours are consistent with existing site operations and reflect typical working hours for industrial uses, largely outside of peak residential movement times.

### Trip Generation (TRICS-Based Estimate)

#### Existing Waste Vehicle Movements

- 6.7 The **waste transfer station** currently generates around **20 vehicle movements per day**, consisting of:
- Small skip lorries and vans (delivering or collecting waste)
  - Site staff or operatives (typically using vans or cars)

6.8 These movements are already embedded within local traffic conditions and have been operating **without recorded highway issues**.

6.9 A typical breakdown is:

- **10 arrivals / 10 departures** across the working day
- Movements are spread from 06:00–16:00, with peak waste-related traffic before midday
- Vehicles are generally small in size (transit vans, 3.5–7.5t skip wagons)

6.10 The anticipated traffic generation has been estimated using the TRICS® database, using comparable land use categories:

Use Class B1c/B2 (Light Industrial)

Use Class B1a (Office – small-scale admin)

6.11 Given the limited scale of the development and available parking, a simplified forecast is as follows:

Period	Arrivals	Departures	Total Trips
Weekday AM Peak (08:00–09:00)	6	3	9
Weekday PM Peak (17:00–18:00)	2	5	7
Saturday Peak (08:00–10:00)	3	2	5

6.12 These trip rates assume a typical occupancy of 1–2 vehicles per industrial unit at peak times and modest staff/visitor activity to the office use. The existing waste operation is already factored into baseline local traffic levels and is not expected to generate additional peak hour movements.

#### **TRICS-Based Traffic Generation Methodology**

6.13 Trip generation estimates for the proposed development have been derived using data from the TRICS® (Trip Rate Information Computer System) database. TRICS is the industry-standard system used to predict vehicular trip rates for new developments, based on observed data from comparable sites across the UK.

6.14 For this assessment, appropriate development types and site selection criteria were applied to ensure the data was reflective of the proposed uses. The following land use categories were used:

- B1c/B2 – Light Industrial Units: Sites with small-scale industrial operations, typically involving light manufacturing, processing, or storage.
- B1a – Offices (General Office Use): For the administrative office associated with the waste transfer use.

6.15 The selected sites from the TRICS database met the following filtering criteria:

- Located within edge-of-town or suburban areas, similar to Birstall
- Gross floor areas of a comparable scale
- With similar levels of parking provision and access to local road networks
- Excluding sites in town centres or major employment hubs that may have atypical trip patterns

6.16 From this filtered data, average peak hour trip rates per 100m<sup>2</sup> GFA were applied to the proposed floor areas of the new industrial units and the office space. As floor areas are modest and total on-site parking is limited to 23 spaces, trip generation has been capped by the physical constraints of the site and the expected staff/visitor levels.

6.17 This approach is considered robust for a development of this scale and use type, and represents a reasonable worst-case scenario. The resulting predicted traffic flows demonstrate that the site will generate a low number of vehicle movements, spread over the operational period and unlikely to place any significant pressure on the local highway network.

6.18 The **total expected daily vehicle movements** (arrivals + departures) across the site are:

<b>Source</b>	<b>Vehicle Movements (2-way total)</b>
Existing Waste Operations	20
Proposed Industrial/Office	Approx. 30–34
<b>Combined Daily Total</b>	<b>50–54 movements per day</b>

6.19 These movements are distributed across a **12-hour operating window**, averaging fewer than **5 vehicle movements per hour**, and are well within the capacity of **Owler Lane, Field Head Lane**, and the adjacent **A650/M62 corridor**.

#### **Traffic Impact and Highway Safety**

6.20 The forecast trip generation is low and well within the capacity of the local road network. The A650 and M62 corridor provide high-capacity routes to regional centres and are designed to accommodate significantly higher volumes than those generated by this proposal.

- 6.21 Owler Lane and Field Head Lane are lightly trafficked estate and local roads respectively. Visibility from the site access is acceptable and there are no known highway safety issues in the immediate vicinity. Vehicle movements will be spread throughout the working day, avoiding any pronounced peak demand or queuing risk.
- 6.22 Given the modest number of vehicle movements, no mitigation is considered necessary. The proposal makes efficient use of previously developed land and will support local employment opportunities with negligible impact on traffic conditions.
- 6.23 The site is proposed to be operated over a 12 hour period Monday to Friday and 10 hour period on Saturdays. This therefore equates to an average of 0.7 HGV deliveries (1.5 movements) per hour and 1.5 skip deliveries (3 per hour).
- 6.24 It is not considered that these additional vehicle movements would be discernible amongst the HGV movements already occurring within the Falconer Road Industrial Estate or give rise to a material adverse impact on the local highway network.

#### **Junction Modelling**

- 6.25 It is considered that the predicted traffic generation (a total of 53 total vehicle movements over the course of a day) do not warrant capacity modelling of any junctions in the vicinity of the site.

## **7. Traffic Routing**

- 7.1 The site is located at the end of Owler Lane, accessed off Field Head Lane.
- 7.2 The majority of vehicle movements to the site will be from the north from jnc 27 of the M62 and the A650 onto Field Head Lane.
- 7.3 Some local traffic to site by staff is anticipated to come from the south (Birstall town) along Field Head Lane.

## **8. Swept Path Analysis**

- 8.1

## **9. Summary and Conclusions**

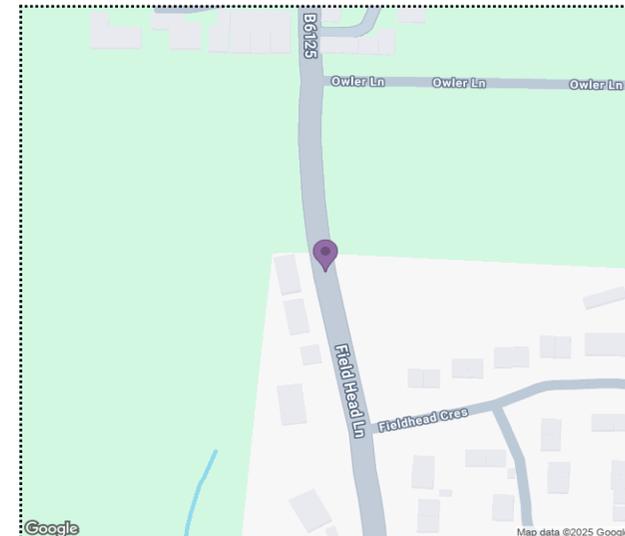
- 9.1 Foxhall Environmental Ltd proposes to redevelop its site at Owler Lane Birstall, through the demolition of three redundant buildings and replace them with three small light industrial units, offices and open storage area.
- 9.2 No new access point is proposed.
- 9.3 The site operations will generate approximately 53 vehicle movements day.
- 9.4 There is no accident history on the local highway network associated with HGVs. There is a single incident noted on the local highway network over the past ten years (none since 2014), indicating the highway network is safe.
- 9.5 It is considered that the proposed level of traffic generation would have no discernible negative impact on the operation or safety of the local highway network.
- 9.6 The site is accessible by foot and cycle. There are limited options for public transport.
- 9.7 Vehicle routing will utilise the A650 and M62.
- 9.8 This Transport Statement has demonstrated that the residual cumulative impacts of the development are not severe. In accordance with the NPPF and in particular paragraph 115, the development should not be refused on transport grounds.

# Appendix I - Crashmap Incident Record



**Validated Data**

<b>Crash Date:</b>	Sunday, November 19, 2017	<b>Time of Crash:</b>	07:56:00	<b>Crash Reference:</b>	2017134BH0306
<b>Highest Injury Severity:</b>	Slight	<b>Road Number:</b>	U	<b>Casualties:</b>	2
<b>Highway Authority:</b>	Kirklees			<b>Vehicles:</b>	3
<b>Local Authority:</b>	Kirklees			<b>OS Grid Reference:</b>	422345 427374
<b>Weather Description:</b>	Fine without high winds				
<b>Road Surface Description:</b>	Frost or Ice				
<b>Speed Limit:</b>	30				
<b>Light Conditions:</b>	Daylight: regardless of presence of streetlights				
<b>Carriageway Hazards:</b>	None				
<b>Junction Detail:</b>	Not at or within 20 metres of junction				
<b>Junction Pedestrian Crossing:</b>	No physical crossing facility within 50 metres				
<b>Road Type:</b>	Single carriageway				
<b>Junction Control:</b>	Unknown				



For more information about the data please visit: [www.crashmap.co.uk/home/faq](http://www.crashmap.co.uk/home/faq)

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**Crash Date:**

Sunday, November 19, 2017

**Time of Crash:** 07:56:00

**Crash Reference:** 2017134BH0306

**Vehicles Involved**

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Car (excluding private hire cars 2005 onwards)	6	Male	21 - 25	Vehicle is slowing down or stopping	Back	Unknown	None	None
2	Car (excluding private hire cars 2005 onwards)	1	Male	21 - 25	Vehicle proceeding normally along the carriageway, not on a bend	Front	Unknown	None	None
3	Car (excluding private hire cars 2005 onwards)	0	Male	36 - 45	Vehicle is parked in the carriageway	Front	Unknown	None	None

**Casualties**

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Driver or rider	Male	21 - 25	Unknown or other	Unknown or other
2	2	Slight	Driver or rider	Male	21 - 25	Unknown or other	Unknown or other

 For more information about the data please visit: [www.crashmap.co.uk/home/faq](http://www.crashmap.co.uk/home/faq)

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