

HDM Review (in red text) on 24/11/25, of previous HDM comments provided in email of 02/09/25

Harron/Optima response 12/12/25 (purple text)

Based on Netherton Revision C Site Layout (Construction), appended to email response to Highways.

### S38 Comments Summary

- No visibility information has been provided. This information should be provided, with all visibility splays contained within the proposed adoptable highway. HDM notes that a number of visitor parking spaces are likely to be impacted by the visibility splays, and may need to be relocated (e.g. the layby spaces adjacent to plots 30 & 53 should be moved further away from the junctions, closer to the drive for plot 29&30). Some flexibility in the junction visibility splay requirements may be acceptable when considering the impact of the visitor parking laybys (e.g. it would be acceptable to measure these junction visibility splays to the nearside wheel track rather than the kerb edge, when considering the impact on visibility caused by a parked vehicle in the laybys, which would be a transient feature).  
**Inset 4 on drawing 25041/IN/01 suggests a visibility splay of 2.4x25m is available at the junction of the shared surface street. However, it is clear that this is not correct and needs to be reviewed. It is noted that as this is a shared surface street, a splay of 2.4x23m can be accepted (but not 2.4x17m, as mentioned by Optima to Jon Beeson in their email of 17/10/25, which will not be accepted by the S38 Highway Adoption Team). We have relocated the Parking Bay for Plot 3 and re-drawn the bend to ensure the vis splay is outside of private ownership. We note that a 2.4m x 17m visibility splay for a 15mph speed limit is considered acceptable within the design guide for a shared surface street however a 2.4m x 23m splay has been shown and measured to the nearside wheel track (which is advised in Manual for Streets 2) and therefore can be achieved within the adopted highway.**
- Shared surface carriageways must be a minimum of 5.5m wide to enable them to be considered for adoption, and not 4.8m wide as currently shown. The entrance treatment to the shared surfaces should also confirm fully with the S38 standard details (e.g. the footway needs to be extended passed the ramp at full width for a minimum of 2m).  
**The shared surface widths are now 5.5m, which are acceptable. However, the footways have not be extended far enough in the shared surface streets, contrary to the standard detail previously provided. Noted, we have extended the full width footway 2m in all instances.**
- Additional/amended traffic calming features are required, to comply with Table 1 of the Kirklees Highway Design Guide SPD (e.g. 45-60m spacing depending on street type). For the shared surface street located along the west of the site, the traffic calming buildouts should be amended to provide a staggered buildout arrangement. The buildouts should also be located to ensure they do not block drives (e.g. the buildout located opposite No. 36's drive will need to be relocated, in addition to the other buildout that should be relocated as highlighted by the S38 Team).

The buildout opposite Plot 37 blocks the drive. This could be addressed by mirroring Plot 37 (e.g. so the drive/garage is on the south side). Noted. Build-out has been shuffled down and Plot 37 handed to ensure vehicles reversing out of bay are onto full width Type C road.

- Swept path analysis is required for the full site layout, confirming the Councils design refuse vehicle can pass a car throughout the layout, including at all bends (e.g. to ensure parked or passing cars do not block access for the refuse vehicle).  
The swept path analysis provided demonstrates that the refuse vehicle cannot pass a car on the bends. This is a specific requirement of the S38 Highway Adoption Team. Therefore, if the applicant is not willing to incorporate the necessary widening, then is likely to present a barrier to adoption. This road has been re-tracked and we are now achieving 7.4m width at the widest point. Updated tracking drawings have been provided which demonstrate a RVC can pass a moving vehicle with a clear distance between the two. Site has been adjusted to suit.
- The level information provided is unclear, and it is not possible to confirm whether the streets have suitable gradients. This includes the shared surface streets, which must have a maximum gradient of 1:20 to be considered for adoption, otherwise these will need to be provided as Local Residential Streets (Type B) instead.  
No chainage plan or road numbering plan has been provided. Therefore, it is not possible to check the long-section information provided. However, it appears that Road 3 may be the shared surface street to the south. If this is the case, the 1:17 gradient that has been shown is not acceptable for adoption, as previously stated. As previously stated, all shared surface street must not exceed the maximum permitted gradient of 1:20. Please see attached 'Highways Area Layout Plan' which assigns the respective roads. Our Engineering department have a meeting with S38 team on Monday 15/12/25 to negotiate the 1:17 gradient.
- 1 visitor parking space per 4 dwellings should be provided in formal laybys, which have minimum dimensions of 2.4x6m, and include a minimum 1m margin when located on streets without an adjacent footway (e.g. shared surface streets), to allow for vehicle alighting. As mentioned above, HDM note that a number of visitor parking spaces are likely to be impacted by the various visibility splays, and some relocation of the visitor parking laybys may be necessary. The laybys also appear to be 2m wide, so will need to be widened to min. 2.4m.  
21 visitor parking bays have now been provided, which is acceptable. However, some of the bays appear to be only 2.0m wide on the Type B streets. Therefore, these need to be widened to 2.4m, as required by the S38 Highway Adoption Team. 2m bays either widened or removed and provided elsewhere at 2.4m+ width. Total bays provided remains at 21.

### Other HDM Comments

In addition to the points raised by the S38 Team, HDM have noted that following points that should also be picked up in the revised layout design:

- No level information has been provided for the PROW links. Whilst the final details of these links are covered by planning condition (Condition 30), indicative level details should be provided to confirm that suitable pedestrian gradients are achieved in accordance with guidance contained in DfT document 'Inclusive Mobility'. It is also noted that this VoC application will also need to vary the wording of previous condition 30 in due course, to reflect the revised site layout and amended alignments of the various footpath links.

Has the path level/gradient information been provided? If so, please confirm which drawing(s) this is shown on? Please see updated 'External Works Layout Sheet 3' which includes levels and gradients for the PROW upgrade along the bottom of site. Full details of materials, section through etc will be picked up as part of Condition 30 discharge.
- Junction visibility to/from the shared private drive serving plots P09-P11 is restricted by the parking bays for plots P08-P03. Therefore, it would appear that these parking spaces will need to be set back further from the highway edge, should this shared private drive be retained. These parking spaces also appears to affect visibility at the junction immediately to the east of the P03's parking space.

As per the earlier comment, this issue has not been addressed. A splay of 2.4x23m needs to be demonstrated that is contained within the adoptable highway. As previous comment; site layout updated to ensure vis splay within highways ownership.
- The shared private drive serving plots P09-P11 is only 4m wide, which is below the minimum width of 4.5m that is required for the first 5m, in accordance with the Kirklees Highway Design Guide SPD.

The drive has now been widening to 4.5m, which is acceptable. OK.
- It is unclear whether all properties will have sufficient off-street parking in accordance with the recommendation in the Kirklees Highway Design Guide SPD, as it is unclear which properties include garages. Therefore, confirmation is required of the proposed off-street parking provision for each plot. For a garage to be taken into account in the provision, this will need minimum internal dimensions of 3x6m.

Has any further information been provided to address this point? If so, please confirm where this information is provided? We have added an item to the key to determine which plots have an integral garage, single and double. All of our integral garages achieve the minimum 3x6m clearances. We have worked to Kirklees design guide in so far as 4/5 bed plots require 3 spaces, 2/3 bed plots require 2 spaces and 1 beds 1 space.
- For each dwelling, a bin collection point should be identified adjacent to the adopted highway. Ideally this should be located on a separate hard standing area. However, should this not be feasible in all locations, it is acceptable for bins to be presented at the end of drives, as long as there is sufficient width for a car to pass (e.g. a minimum drive width of 3.3m for a single drive, or 5.7m for a double drive, is typically required).

BCP have only been shown for the shared private drives. Therefore, it is unclear whether suitable provision is provided for the individual dwellings (e.g. without drives/paths being blocked). Further information is required. Plots that front onto full width footpaths (2m) use the footpath as the collection point. Assume comment is referring to where a hard margin only is present. Please confirm origin of 3.3m or

5.7m for single/double drives respectively? We have ensured for plots affronting hard margins either a BCP space has been added or one of two parking bay widths have increased to 3m, which is typically accepted by Highways for a 2.1m parking space and 900mm clear width for bin drag/collection at end of drive.

- Shared bin collection points (BCP) are required for properties accessed from shared private drives, which should be located adjacent to the highway. HDM note that the BCP adjacent to plot no. 77 should be relocated so that it is adjacent to the proposed adoptable highway. The bin carry distance for Plot 79-80 will be well in excess of the recommended maximum 25m carry distance, when the bin presentation point has been relocated adjacent to the highway. Therefore, it is recommended that these units are reorientated (e.g. rotated by 90 degrees clockwise), which will help to reduce the bin carry distance. The bin carry distance also appears to be in excess of 25m for plots 15 & 16, and so these plots design should also be reviewed.

**This matter has not been addressed.** BCP to P77 is in a compliant position, rear access from P79/80 has been added for compliant bin drag route. BCP to P12-16 has been relocated the Max 25m from refuse stopping point on shared surface, to reduce bin drag length from plots.

- Some of the drives/parking spaces have boundary fences immediately adjacent to the parking spaces (e.g. plot P11 & P04), which will impact the affective width of the parking spaces. Therefore, an additional margin of 0.6m (0.3m absolute minimum) should be provided around all parking spaces where there is an adjacent vertical feature.

**This matter has not been addressed.** Plot 3/4, 17/18, 8-11, 30-31, parking/gardens redesigned to ensure clear width (either by adding dedicated margins, or widening parking bays to 3m).

- Cycle parking is required for all dwellings. This should be provided in accordance with LTN 1/20 guidance (See section 11 for cycle parking guidance). Cycle parking should be accessible via external routes that are of sufficient width and alignment to allow easy access. At present, it is unclear what cycle parking provision will be provided. However, if this is proposed to be within secure garden sheds and/or garages, these need to be of sufficient size to accommodate a range of bikes (e.g. 1x2m area is typically required for a single cycle stand accommodating a standard bike).
- **This matter has not been addressed.** Spec of cycle sheds will be put forward against outline planning condition. It will be a timber pent shed, end entry. Currently shown as 1.2x1.8m. A 1x2m space would be achievable in all our 3x6m clear garages (on the basis of the vehicle taking up no greater than 3x5m (which exceeds basic parking standards). Please see attached cycle shed spec sheet.

#### Additional / Amended Information required:

- Updated plans to address the above design issues;  
**Further amendments required.** Please see appended to email.
- Swept path analysis (SPA) of the Kirklees Design Refuse vehicle passing a large car throughout the layout;

Updated SPA required to confirm that all roads are suitable for adoption. Please see appended to email.

Plans showing all junction and forward visibility splay requirements;

Further amendments required. Please see appended to email.

- Updated long section information and supporting chainage plans, which confirm that all streets will comply with our adoption requirements (this includes no shared surface streets steeper than 1:20, as mentioned above).

Further amendments required. Now added on 'Highways Area Plan'. 1:17 to be discussed further.

Provide a 'Highway Areas Plan', showing the areas that are to be offered for adoption, and those that are to remain private (e.g. shared private drives will remain private, but their extents still need to be defined). This plan should include the annotation as indicated on the attached sample 'Highway Areas Plan\_Adoption\_V3.pdf' drawing.

This has not been provided. However, it is noted that at present the streets are not suitable for adoption. Please see appended to email, by Elston.

Provide a Stage 1 Road Safety Audit (RSA) and agree the subsequent Design Response report with HDM. The RSA needs to be based on the revised preliminary plans once they have been agreed, and based on an RSA Brief (in line with GG119), which has been previously approved by HDM in consultation with our Highway Safety Team. To help expedite matters, I would be pleased to receive a draft RSA Brief for review as soon as possible, to ensure the RSA can follow quickly once the revised layout has been agreed.