

SAVE MIRFIELD

**LAND EAST OF WOODWARD COURT, MIRFIELD
OBJECTIONS TO PROPOSED RESIDENTIAL DEVELOPMENT
BY BELLWAY HOMES ON HIGHWAY GROUNDS**

February 2026

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– Independent Transport Planning Consultant

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1 EXECUTIVE SUMMARY

1.1 Introduction

- 1.1.1 Save Mirfield object to the planning application for a residential development of 75 dwellings on land east of Woodward Court, Mirfield by Bellway Homes (LPA Ref: 2025/93355) as the proposed development would have an **unacceptable impact on road safety** throughout the local area. The main site access is on Woodward Court, with egress onto Hepworth Lane, for left turning traffic also proposed. The proposed site access arrangements are considered unsatisfactory and traffic generated by the proposed development would unacceptably affect safety and operation of the local highway network.

1.2 Planning History

- 1.2.1 The site has a long planning history, with applications for residential development submitted in 1998, 2014 and 2017. None of these proposals have been approved and all have been considered unacceptable for highway safety reasons. A planning application for 98 dwellings was refused following a public inquiry in 1999. An application for 135 dwellings submitted in 2014 was recommended for refusal and withdrawn prior to Committee. An application for 61 dwellings was submitted in 2017 and refused on highway grounds. **The message is therefore clear that the site is not suitable for residential development for highway safety reasons.**

- 1.2.2 The 2017 application was refused for two reasons, relating to planning policy and highway safety. **The highway safety reason remains applicable and is set out below**, with references to NPPF and the Local Plan updated to refer to current documents.

2017/93935 Reason for Refusal No2 - The proposed development would lead to additional traffic impacts on an already constrained local highway network which, by virtue of the existing network of narrow roads, the close proximity of the proposal to the existing school (Crossley Fields Junior and Infant School), and the substandard visibility at the junction of Woodward Court and Wellhouse Lane, would result in an unsafe development which would fail to acceptably mitigate the degree of conflict between all users. The proposed development would lead to an unacceptable highway safety impact, contrary to paragraph 109 116 of the National Planning Policy Framework, ~~policy T10 of the Kirklees Unitary Development Plan and policy PLP21 of Kirklees~~ ~~Publication Draft Local Plan~~ and policies LP6 and LP21 of the Kirklees Local Plan.

1.3 Planning Policy Context

- 1.3.1 The application site is allocated in the Local Plan, adopted in February 2019 as 'Safeguarded Land' (land to be safeguarded for potential future development). Policy LP6 indicates that the status of safeguarded land site will only change through a review of the Local Plan. **The granting of planning permission for residential development on a piecemeal basis as now proposed is considered premature and would be contrary to the provisions of Local Plan Policy LP6.**
- 1.3.2 The proposals would also be contrary to Local Plan Policy LP21, which deals with Highway Safety and Access **as the proposed development would prejudice the safe and efficient flow of traffic and materially add to existing highway safety problems.**
- 1.3.3 The Council does not have a 5-year supply of deliverable housing land, however for this and other reasons, the Council is undertaking a review of the Local Plan. The National Planning Policy Framework sets out a presumption in favour of sustainable development (in paragraph 11) however it is considered that **the adverse road safety impacts arising from the proposed development would significantly and demonstrably outweigh the benefits, such that planning permission should be refused for highway safety reasons**, with housing land supply issue being properly addressed through the Local Plan review.

1.4 Unacceptable Road Safety Impacts

- 1.4.1 The Officer report to the Council's Strategic Committee of July 2015 sets out the unacceptable road safety impacts arising from the 2014 planning application, concluding that planning permission should be refused for road safety reasons. **The analysis by Council Officers remains applicable and provides clear-cut justification for refusal of the current application.**
- 1.4.2 The unacceptable road safety impacts recognised by Highways Officers, with which Save Mirfield fully agree, are as follows:
- Woodward Court - is proposed for site access and is congested with parked vehicles at the beginning and end of the school day with resulting pedestrian vehicle conflict
 - Visibility onto Wellhouse Lane from Woodward Court - visibility to the left is sub-standard for a driver exiting Woodward Court onto Wellhouse Lane

- The Officer appraisal of the 2014 application indicates that **‘any measurable increase in traffic’ at the following locations would be ‘detrimental to safety and operation’**:
 - Wellhouse Lane (north of Woodward Court) – conflicts between pedestrians, parked vehicles and vehicle flows at the beginning and end of the school day (photo 1 below)
 - Wellhouse Lane (south of Woodward Court) – conflicts between pedestrians, parked vehicles and vehicular flows at the beginning and end of the school day. (photo 2 below). The section between Hepworth Lane and Flash Lane is not wide enough for two-way traffic with only a narrow footway
 - Hepworth Lane (one-way section) – conflicts between pedestrians and vehicles on this narrow section which lacks footways

1.4.3 A recent survey undertaken by Save Mirfield confirms that **extensive on-street parking continues** to take place on Woodward Court, Wellhouse Lane and other local roads at the beginning and end of the school day, creating pedestrian vehicle conflict and a hazardous environment for vulnerable road users. In such circumstances Woodward Court cannot be considered a safe and satisfactory site access.

1.4.4 The submitted Transport Assessment confirms that a **‘measurable increase in traffic’** would result throughout the local area, which from the Council’s own assessment would be **unacceptable from a road safety viewpoint**. The locations of particular concern listed in paragraph 1.4.2 above and include Woodward Court, Wellhouse Lane and Hepworth Lane. The proposed egress onto Hepworth Lane is also considered unacceptable on road safety grounds as in addition to the stated inadequacies of Hepworth Lane, safe and satisfactory operation of the egress would be prejudiced by on-street parking nearby.

1.5 Potential Mitigation Measures

1.5.1 The application seeks to address the visibility issue at the junction of Woodward Court and Wellhouse Lane through provision of traffic calming measures which are set out below, with additional waiting restrictions also proposed on Wellhouse Lane:

- A raised table at the junction of Woodward Court and Wellhouse Lane;
- A flat-top road hump on Wellhouse Lane, 55 metres south of Woodward Court;
- A flat-top road hump on Wellhouse Lane, 130 metres north of Woodward Court (and approximately 35 metres north of the school access)

1.5.2 The traffic calming measures seek to reduce the speed of traffic on Wellhouse Lane approaching the junction with Woodward Court to a level at which the visibility available is sufficient. **A Road Safety Audit of the mitigation proposals has however not been undertaken and is required.** The mitigation measures as now proposed are however considered unsatisfactory on road safety grounds due to the excessive distance (130 metres) between the raised table at the junction of Wellhouse Lane and Woodward Court and the road hump on Wellhouse Lane, to the north of the Crossley Fields school access.

1.5.3 Government guidance¹ indicates a spacing of 60 to 90 metres between traffic calming features, is desirable and that spacings of more than 100 metres may give rise to increased speeds between the traffic calming measures (with vehicles accelerating away from one traffic calming feature and braking when approaching the next). **The potential for the increased traffic speeds on the Crossley Fields school frontage is considered unacceptable from a road safety viewpoint.**

1.6 Rat Running

1.6.1 The applicant asserts that some existing traffic heading southbound on Wellhouse Lane would be drawn through the new development such that traffic flows on Wellhouse Lane south of Woodward Court would be reduced. **With the existing peak period congestion on Woodward Court, the route through the site is however unlikely to be attractive,** as to comply with the Council's Highway Design Guide a new street through the development would need to be designed to constrain traffic speeds to below 20mph.

1.6.2 If the applicants are correct and the street through the development became an attractive alternative route, **rat-running during off-peak periods**, when roads in the vicinity of the site are not congested would be a concern. In such a scenario additional non-local traffic could be drawn from a wider area, from Greenside for example leading to an increase in traffic on Wellhouse Lane, passing the Crossley Fields school, which would be **unacceptable from a road safety viewpoint.**

¹ Para 3.3.7 of Local Transport Note 1/07 – published by the Department for Transport in March 2007.

1.7 Transport Assessment

1.7.1 The submitted Transport Assessment (TA) is considered unreliable:

- The PM peak hour has not been correctly identified. The TA refers to the PM peak hour as being from 4pm to 5pm, whereas traffic flows in the local area are higher from 3pm to 4pm.
- Trip rates used in the TA to assess traffic generation are too low. With above average car availability in the local area and limited accessibility to public transport, the development would be reliant on car-based travel such that the peak period trip rate of 0.7 vehicle trips per hour, favoured by Council Officers when considering previous applications should be used.
- The operational analysis is considered unreliable as the assessment models have not been calibrated against observed queue lengths, such that future year assessments are unduly optimistic and cannot be relied upon

1.8 Conclusions

1.8.1 The proposed development of 75 dwellings would give rise to **unacceptable impacts on road safety throughout the local area**. Woodward Court is not suitable for access due to on-street parking and pedestrian vehicle conflict at the beginning and end of the school day. The proposed egress onto Hepworth Lane is also unacceptable on road safety grounds as operation would be prejudiced by restricted road width and on-street parking nearby.

1.8.2 Visibility to the left at the junction of Wellhouse Lane and Woodward Court is sub-standard with the intensification of use arising from the proposed development resulting in increased risk of collision. Whilst the applicant has identified traffic calming measures with a view to mitigating this issue, the proposed traffic calming scheme is considered unacceptable as based on Government guidance the proposals may result in increased traffic speeds on the Crossley Fields school frontage.

1.8.3 The proposed development would result in an undesirable increase in traffic on Wellhouse Lane, passing Crossley Fields School. An undesirable intensification of Wellhouse Lane to the south of the site would also result, including the junction with Hepworth Lane where visibility is severely restricted. The resulting increase in traffic on the narrow section of Hepworth Lane, where footway provision is inadequate would be unacceptable on road safety grounds.

- 1.8.4 Arising from the unacceptable impact on highway safety the proposed development would be contrary to Local Plan Policy LP21 of the Local Plan and paragraph 116 of the National Planning Policy Framework. Accordingly, planning permission should be refused on highway grounds, consistent with the refusal of applications for residential development submitted in 1998, 2014 and 2017.

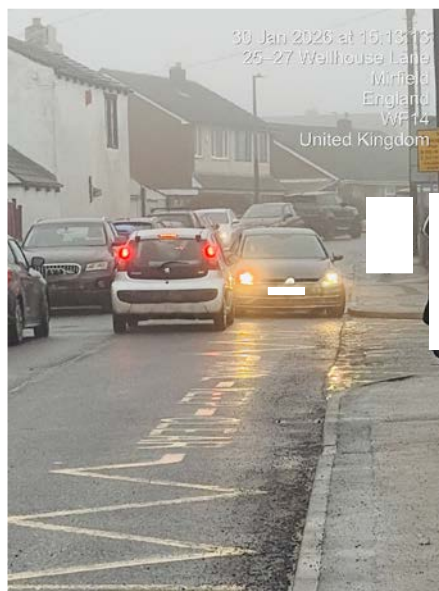


Photo 1. Traffic Congestion on Wellhouse Lane, on the Crossley Field School frontage



Photo 2. Traffic Congestion on Wellhouse Lane, south of Woodward Court.

Photos Courtesy of

2 PLANNING HISTORY

2.1 Introduction

- 2.1.1 This section of the report considers the planning application history of the site, reviewing highway matters relevant to applications for residential development made in 1998, 2014 and 2017, none of which were approved. It is understood that an application was also made in 1983 however details of this submission are not available.

2.2 1998 Planning Application

- 2.2.1 An outline planning application submitted in 1998 (98/60/92026/E4) proposed a development of 124 dwellings, with 98 dwellings on what is broadly the current application site, with access from Woodward Court and a further 26 dwellings off Wellhouse Lane and Greenside Road. Pedestrian access and vehicular access for use in emergency, was also proposed on Hepworth Lane.
- 2.2.2 A public inquiry was held in February and March 1999 with an appeal against non-determination of the application dismissed and planning permission refused. The Inspector concluded that additional use of the junction of Wellhouse Lane and Woodward Court would '*create a danger to highway users*' due to sub-standard visibility, contrary to UDP Policy T10. The Inspector considered that these concerns alone justified the refusal of planning permission and dismissal of the appeal. Whilst visibility criteria have been updated since the 1999 inquiry, road safety concerns are considered to remain a constraint on development of the application site.

2.3 2014 Planning Application

- 2.3.1 A full planning application for a development of 135 dwellings on the current application site was submitted in 2014, with access from Woodward Court. Vehicular access to Hepworth Lane for use in emergency was also proposed. Whilst the application was withdrawn prior to determination, a report to the Council's Strategic Committee in July 2015 recommended refusal of planning permission for three reasons relating to highway safety, drainage and site layout. The highway reason for refusal indicated in Council's report is set out below:

'The cumulative impacts associated with the proposed scale of development and associated traffic cannot be efficiently and safely accommodated on the local highway network within the vicinity of the site. The development is therefore considered to be contrary to policy T10 of the Councils Unitary Development Plan'

- 2.3.2 The Council's July 2015 Committee report provides a detailed appraisal of the traffic and road safety implications of the proposals which is directly relevant to the current proposals. With regard to proposed site access from Woodward Court, the Council's report notes the existing traffic congestion and pedestrian vehicle conflicts evident at the beginning and end of the school day and the difficulties experienced by residents during these periods.

- **Site Access – Woodward Court:**

'During the period running up and after the school start (0855hrs) and finish (1520hrs and 1530hrs) times Woodward Court is heavily parked up by parents taking their children to and from school. Conflicting vehicle movements together with adult and children pedestrian movements are not uncommon within these periods.

Woodward Court residents find it extremely difficult to leave their homes by car, or arrive with any confidence of being able to access their driveways'.

- 2.3.3 The Council's report notes that whilst visibility to the right from Woodward Court at the junction with Wellhouse Lane is satisfactory, visibility to the left is substandard based on relevant criteria set out in Manual for Streets (which remain applicable today):

- **Visibility – Woodward Court along Wellhouse Lane:**

'With regard to visibility requirements along Wellhouse Lane from the junction of Woodward Court, several speed readings with analysis have been provided within the Transport Assessment and Technical Note..... From Woodward Court's junction to the north along Wellhouse Lane visibility is considered acceptable in relation to the 30mph speed limit, but substandard to the south relative to the available 29.3m 'Y' distance and the required 43.0m.

- 2.3.4 The 2015 Committee report sets out concerns regarding the impact of generated traffic on safety and operation of local road links between key junctions. The report states that **'any measurable increase in traffic'** on the sections of Wellhouse Lane between Jenny Lane and Woodward Court and between Woodward Court and Hepworth Lane and on the one-way section of Hepworth Lane, east of Wellhouse Lane would be detrimental to safety and operation as detailed below:

- **Road Links (between junctions):**

In terms of road links between the assessed junctions set out above, HDM have concerns in how the development traffic would be accommodated along:

- **Wellhouse Lane (north of Woodward Court):**

At school start and finish times Wellhouse Lane between Jenny Lane and Woodward Court becomes extremely busy with pedestrian flows, on street parking, and heavy vehicular flows often resulting in restricted two-way flows with on-site observations often witnessing tangible frustration between pedestrians, residents, and drivers. HDM consider that any measurable increase in vehicular activity along this section of highway can only make the current situation worse.

- **Wellhouse Lane (south of Woodward Court) to Hepworth Lane:**

At school start and finish times Wellhouse Lane between Woodward Court and Hepworth Lane becomes extremely busy with pedestrian flows, on street parking, and heavy vehicular flows. From Hepworth Lane to Flash Lane where the road is narrow with a low kerbed narrow footway and two way vehicular flows cannot be achieved. Vehicle queuing and overrunning of the footway is frequent.

As a result, pedestrians feel unsafe and intimidated with vehicular dominance along this section of Wellhouse Lane. HDM consider that any measurable increase in vehicular activity along this section of highway can only make the current situation worse.

- **Hepworth Lane – One way section:**

At school start and finish times this section of Hepworth Lane becomes busy with both pedestrian and vehicular flows. Due to the narrow nature of this section of Hepworth Lane and the lack of footways, any interaction between pedestrians and vehicles has to be very conscious and careful. Pedestrians are often observed as being subservient in that it is the vehicle that passes the pedestrians and not the car stopping and letting the pedestrians pass. There is also a history of drivers deliberately travelling against the one-way flow as a short cut, and to avoid the narrow stretch of Wellhouse Lane between Hepworth Lane and Flash Lane. HDM consider that any measurable increase in vehicular activity along this section of highway can only make the current situation worse.

- 2.3.5 The Transport Assessment submitted in 2014 models operation of key junctions in a 2014 base year and a 2019 future year, with and without the proposed development. The July 2015 Committee report comments that the analysis does not properly reproduce base year operation as observed on site (as the models have not been calibrated against observed queue lengths) and therefore cannot be considered to provide reliable future year assessment of operation and development impact.

- **Junction Modelling:**

It is noted that the modelling outputs (which include the cumulative highway impact from the approved Mirfield Moor development) indicate that the junctions operate within capacity (with the exception of the junction Dunbottle Lane / Flash Lane (mini-roundabout). However, HDM would argue that computer software should be used as point of reference only and viewed alongside site observations, not just at the junctions but also the road links between them.

The following junctions are considered by HDM to have existing material issues in their operation, efficiency, and perception of user safety which would be exacerbated by adding the forecast development traffic:

- a) Wellhouse Lane / Woodward Crescent (priority junction):*
- b) Wellhouse Lane / Flash Lane (priority junction):*
- c) Hepworth Lane / Wellhouse Lane / Pumphouse Lane:*
- d) Wellhouse Lane / Jenny Lane / Wellhouse Avenue:*

- 2.3.6 In view of the unacceptable impact on road safety, Council Officers recommended refusal of the 2014 planning application on highway grounds, with further reasons relating to drainage and site layout. The application was however withdrawn prior to determination.

2.4 2017 Planning Application

- 2.4.1 A planning application for a development of 61 dwellings on the current application site was submitted in November 2017 (LPA Ref: 2017/93935), with access proposed from Woodward Court. Objections were submitted by numerous local people and local community groups, many stating that proposals for developing the site had been considered and rejected previous occasions. The expectation was clear that the 2017 application should again be refused as development had been considered unacceptable on highway safety grounds on previous occasions.

- 2.4.2 The 2017 application included traffic calming measures on Wellhouse Lane, with a 'raised table' feature at the junction of Wellhouse Lane and Woodward Court and road humps on Wellhouse Lane to the north and south of the junction. Arising from the excessive distance between traffic calming features resulting in vehicles accelerating away from one traffic calming feature before braking before the next, it was considered that the traffic calming scheme would lead to increased traffic speeds on the Crossley Fields school frontage. As such, in seeking to resolve the junction visibility issue, unacceptable road safety impacts were anticipated on the school frontage.

2.4.3 Whilst the 2017 application sought to resolve the visibility issue at the junction of Wellhouse Lane and Woodward Court, mitigation measures to address the area-wide concerns identified by Council Officers in the 2014 application were not proposed. The expectation was therefore that Officers would again recommend the application for refusal on highway grounds. Highways Officers however for reasons which remain unclear raised no objections to the proposed development. The application was determined at the Council's Strategic Planning Committee in October 2018, when Members refused planning permission for two reasons; the first relating to planning policy and the second recognising the unacceptable impacts on road safety. The Decision Notice for the 2017 application (Ref: 2017/93935) is included as Appendix A.

3 PLANNING POLICY ISSUES

3.1 Introduction

- 3.1.1 This section of the report considers the context for considering the current application providing by national and local policy guidance.

3.2 National Planning Policy Framework

- 3.2.1 The National Planning Policy Framework (NPPF) updated in February 2025 confirms a presumption in favour of sustainable development (in paragraph 10 and 11 of the Framework) advising that for decision-taking this means:

NPPF Paragraph 11

- *c. approving development proposals that accord with an up-to-date development plan without delay; or*
- *d. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

- 3.2.2 The footnote to paragraph 11 of the Framework indicates that the term 'out-of-date' includes situations where the Council cannot demonstrate a 5-year supply of deliverable housing sites. It is recognised that the Council does not have a 5-year supply of deliverable housing sites, such that clause (dii) above is applicable. It is considered however that the unacceptable impacts on highway safety arising 'significantly and demonstrably' outweigh the benefits of granting planning permission, with housing land supply issues being properly addressed through the Local Plan review, such that refusal of the current application on highway grounds is fully justified.

- 3.2.3 Highway matters are considered in paragraph 116 of the Framework, set out below, with subsequent sections of this report confirming that the reasons for refusal of previous applications for housing development remain applicable due to the unacceptable impacts on highway safety:

NPPF Paragraph 116 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

3.3 Kirklees Local Plan

- 3.3.1 Kirklees Local Plan was formally adopted in February 2019. The application site is not allocated for housing in the Local Plan. It is however allocated as 'Safeguarded Land' under Policy LP6, which is set out below.

Policy LP6 - Safeguarded land (land to be safeguarded for potential future development)

Areas identified as safeguarded land will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses. All proposals must not prejudice the possibility of long term development on safeguarded land sites.

The status of safeguarded land sites will only change through a review of the Local Plan.

- 3.3.2 Policy LP6 indicates that the status of safeguarded land site will only change through a review of the Local Plan, which the Council is now undertaking. The granting of planning permission for residential development on a piecemeal basis as now proposed would therefore be contrary to the provisions of Local Plan Policy LP6, with future use of the site to be properly considered as part of the review process.

- 3.3.3 The granting of planning permission at this stage is considered premature as referenced in paragraph 51 of the NPPF, as it is considered the granting of planning permission would prejudice the outcome of the Plan making. The review will seek to ensure an appropriate mix of housing site is allocated, in terms of location, size and market sector etc and a phased delivery of such sites; objectives that would be prejudiced by the piecemeal granting of planning permission prior to completion of the review process.

- 3.3.4 The proposed development is considered contrary to Local Plan Policy LP21 as the proposals would prejudice the safe and efficient flow of traffic and materially add to existing highway safety problems. Policy LP21 is set out below:

Policy LP21 - Highways and access

Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users.

New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.

Proposals shall demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals shall also consider any impacts on the Strategic Road Network.

All proposals shall:

- a. ensure the safe and efficient flow of traffic within the development and on the surrounding highway network;*
- b. where needed, provide new infrastructure or improvements on or off site to ensure safe access from the highway network for pedestrians, cyclists, public transport users and private vehicles;*
- c. be accompanied by a supporting Transport Assessment or Transport Statement where the development would generate significant trip generation, providing detail as to the impact on highway safety, air quality, noise and light restrictions;*
- d. take into account changes in site levels and topography to ensure the development can be accessed easily and safely by all sections of the community and by different modes of transport;*
- e. take into account the features of surrounding roads and footpaths and provide adequate layout and visibility to allow the development to be accessed safely;*
- f. take into account access for emergency, service and refuse collection vehicles;*
- g. provide on-site safe, secure and convenient cycle parking/storage facilities to encourage sustainable travel modes.*

- 3.3.5 It is noted that the 2017 application was refused for reasons including non-compliance with draft Local Plan Policy PLP21, the forerunner of adopted Local Plan Policy LP21. The unacceptable impacts on road safety identified in connection with the 2017 application are not resolved such that the current application remains contrary to Local Plan Policy LP21. The site cannot be 'accessed effectively and safely by all road users' and cannot be 'adequately served by the existing local highway network', such that the current planning application should be refused.

4 THE LOCAL HIGHWAY NETWORK

4.1 Introduction

4.1.1 This section of the report considers existing traffic conditions in the vicinity of the site.

4.2 The Local Highway Network

4.2.1 Woodward Court is a residential cul-de-sac that provides access to 12 dwellings and which the applicant proposes as the main vehicular access to the development. Woodward Court provides a 5.9 metre carriageway flanked by a 2.0 metre footway to each side. Woodward Court joins Wellhouse Lane at a simple priority junction. Visibility to the right onto Wellhouse Lane is satisfactory although the visibility splay to the left is sub-standard and limited to 2.4 x 29.3 metres, the normal requirement in an urban location with a 30mph speed limit in operation being 2.4 x 43 metres.

4.2.2 Wellhouse Lane provides for the distribution of traffic through the local area. To the north of Woodward Court, residential frontage development has taken place on the western side of Wellhouse Lane with Crossley Fields Junior and Infants School to the east. This section of Wellhouse Lane is a two-lane single carriageway on which traffic movement is subject to a 30mph speed limit, with a 5.5 metre carriageway generally available and a footway to each side. The vehicular access to the school is situated on Wellhouse Lane some 100 metres north of the junction with Woodward Court, with a separate pedestrian access 70 metres north of Woodward Court. Off-street parking is available within the school grounds for staff however use by parents for parking or dropping-off/collecting children is not permitted.

4.2.3 Crossley Fields Junior and Infants School is a focus of activity at the beginning and end of the school day, with vehicles taking children to and from school and extensive school related on-street parking on Woodward Court, Wellhouse Lane and throughout the local area. Significant pedestrian activity is evident with locally based parents walking to and from school, often with younger children and pedestrians also walking to and from parked vehicles. This combination of demands for movement, together with traffic and on-street parking unrelated to the school leads to significant traffic congestion and accident risk.

- 4.2.4 The school currently has around 480 pupils aged from 4 to 11 years of whom around 210 are understood to be resident in Mirfield (the WF14 post-code). The remainder are resident further afield, mainly in Thornhill Lees and Ravensthorpe, with small numbers coming from Huddersfield and Bradford. Whilst it may be feasible for children resident locally in Mirfield to walk to school, the majority who are resident further afield (270 of the 480 pupils) travel by car. This is confirmed by reference to the 2024 National Travel Survey² which found that for children aged 5 to 10, of those travelling 2 to 5 miles (such as those resident in Thornhill Lees or Ravensthorpe), 83% travelled to and from school by car.
- 4.2.5 The school day runs from 8:40am to 3:15pm for the younger children and from 8:45 to 3:20pm for older children. The school has a Breakfast Club which runs from 7.45am each day and an After School Club that runs through to 5:00pm. The school takes part in the WOW initiative that encourages children to walk to school, as an alternative to car travel. The safety of children whether walking to and from school from home or travelling by car, parking locally and completing their journeys on foot is clearly of paramount importance.
- 4.2.6 On-street parking in the vicinity of the Crossley Fields Junior and Infants School is controlled by Traffic Regulation Order (TRO) which extends on both sides of Wellhouse Lane from the school access to a point south of Woodward Court, with an initial 10 metre length of Woodward Court also included. The TRO prohibits on-street waiting at the beginning and end of the school day (Monday to Friday from 0800-0930 and from 1500-1600 hours), with the exception of a 'drop and go' zone on the eastern side of Wellhouse Lane fronting the school which can accommodate 4 cars and is available during the morning period only.
- 4.2.7 Proceeding south from the junction with Woodward Court, Wellhouse Lane initially provides a two-lane carriageway generally 5.5 metres in width, flanked by a single eastern footway. Wellhouse Lane is joined from the east by Hepworth Lane at a simple priority junction, approximately 200 metres south of Woodward Court, with entry onto Hepworth Lane from Wellhouse Lane prohibited. Drivers exiting Hepworth Lane have appropriate visibility of traffic on Wellhouse Lane to the right, however minimal perception of traffic approaching from the left as visibility is limited to almost zero due to the proximity of third party land and boundary walls (see photo 3 below).

² <https://www.gov.uk/government/statistics/national-travel-survey-2024/nts-2024-travel-to-and-from-school>
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By Bellway Homes On Highway Grounds
apk/2601/v2
February 2026

- 4.2.8 To the south of Hepworth Lane, Wellhouse Lane narrows significantly with carriageway width varying from 3.2 metres, which is not sufficient for two cars to pass, to around 4.5 metres, which would enable two cars to pass with minimal tolerance. Footway provision on this section of Wellhouse Lane is also sub-standard with only a single footway of less than 1.0 metre available, with a minimal kerb upstand. Footway provision is therefore insufficient to enable pedestrians walking in opposite directions to pass. The restricted carriageway width and minimal kerb upstand also results in vehicles using the footway to pass an oncoming vehicle. Carriageway and footway provision on this section of Wellhouse Lane is therefore unsatisfactory with resulting vehicle-vehicle and pedestrian vehicle conflicts.
- 4.2.9 At its southern end, Wellhouse Lane joins Flash Lane at a simple priority junction, with Wellhouse Lane the minor road. Visibility to left and right onto Flash Lane is well below normal standards with drivers exiting Wellhouse Lane having very limited perception of approaching traffic on the major road. Safety and operational problems are compounded by on-street parking on Flash Lane adjacent to the junction and by the limited width of Wellhouse Lane adjacent to the junction, which is too narrow for vehicles to pass.
- 4.2.10 Hepworth Lane extends some 280 metres in a westerly direction from Shillbank Lane to Wellhouse Lane. Bellway propose an egress from the development for left turns only onto Hepworth Lane, approximately midway along the 275 metre length. Proceeding from Shillbank Lane, the initial section of Hepworth Lane is narrow with carriageway width limited to around 4.2 metres in places. With property boundary walls and fences at the edge of carriageway oncoming vehicles would have difficulty in passing. There are also no footways on this section of Hepworth Lane, with resulting pedestrian vehicle conflict.
- 4.2.11 Carriageway width increases at the proposed point of egress to around 5.5 metres with a single footway available on the southern side. A section of new 2.0 metre wide footway is proposed on the northern side of Hepworth Lane extending eastward from the proposed egress. On-street parking is however evident on this section of Hepworth Lane as numerous existing dwellings do not have off-street parking that would restrict turning movements from the development (as shown below in Image 1).
- 4.2.12 The western section of Hepworth Lane is one-way westbound, with a 'No Entry' sign in place at the junction with Wellhouse Lane. This 45 metre section of Hepworth Lane narrows to around 3.0 metres (see photo 4 below), with no footway provision. Conflicts between moving vehicles, parked vehicles and pedestrians are such that an intensification of use of Hepworth Lane would be unacceptable on road safety grounds.



Photo 3. Hepworth Lane Junction With Wellhouse Lane – Visibility to the Left Almost Zero



**Image 1. On Street Parking at the Proposed Egress Location on Hepworth Lane
(Google Street View 2023)**



Photo 5. Hepworth Lane from Wellhouse Lane Illustrating Restricted Carriageway Width

Photos Courtesy of

4.3 Road Traffic Accidents

4.3.1 Details of road traffic accident involving injury have been obtained from the Crashmap database. An extract below shows diagrammatically the location of road traffic accidents involving injury recorded in the last 5 years. Two road traffic accidents involving injury were recorded in locations relevant to the proposed development, with a pedestrian receiving 'slight' injuries in both incidents. The incidents are described below, with detailed reports provided in Appendix B:

- In October 2022 a pedestrian in the age range 11-15 received 'slight' injuries when in collision with a car on Hepworth Lane, east of the junction with Hepworth Close. The incident occurred on a weekday at 4.17pm, in daylight hours when it was raining.
- In May 2023 a pedestrian in the age range 26-35 received 'slight' injuries with two cars involved in the incident to the north of the school access on Wellhouse Lane. The incident occurred on a weekday at 3.10pm in daylight hours in a period of fine weather.

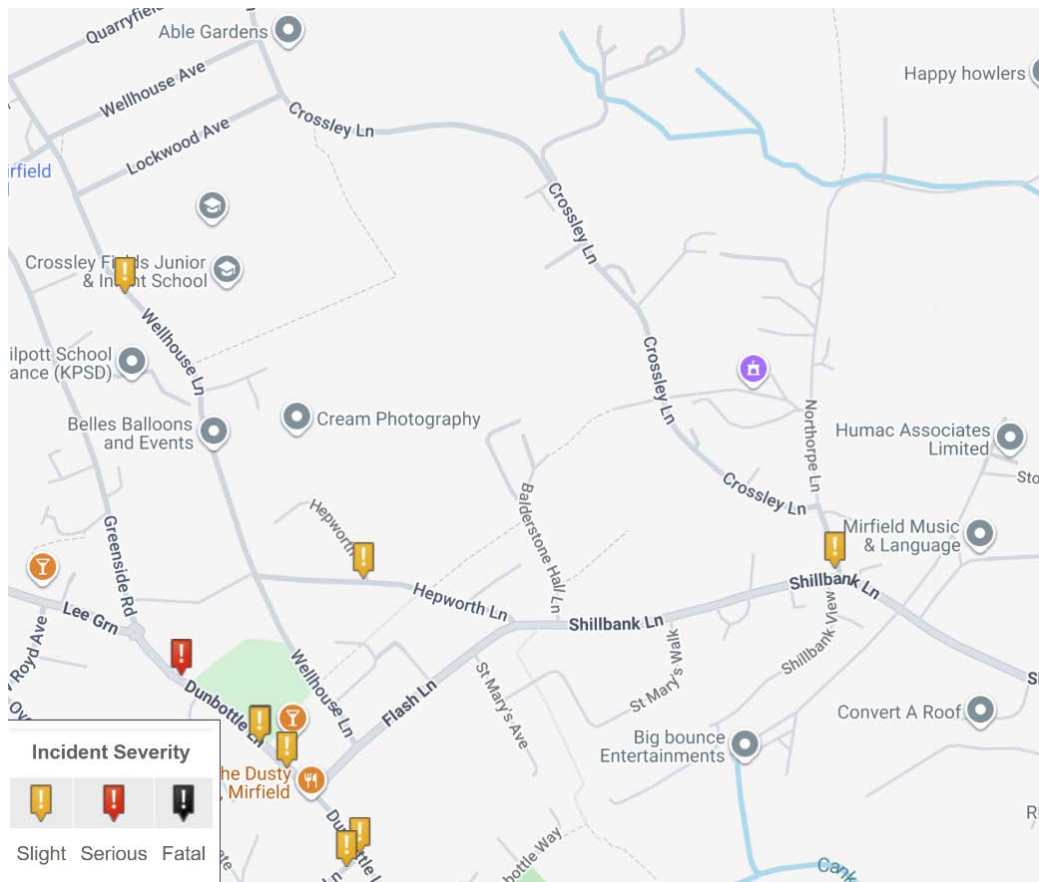
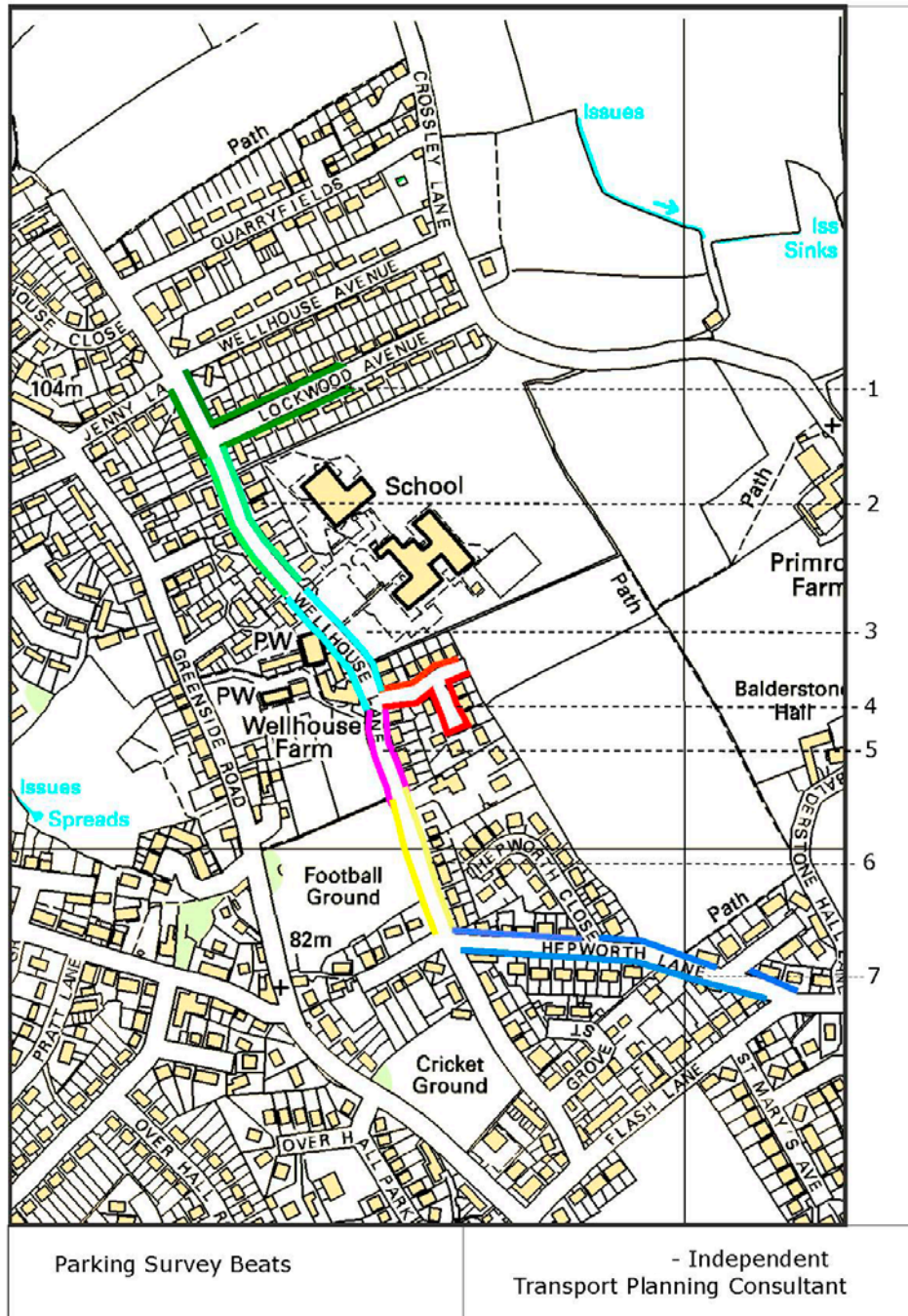


Image 2. Extract from Crashmap Showing the Location of Injury Accidents Recorded in the Last 5 Years

4.4 On Street Parking

- 4.4.1 Extensive on-street parking takes place on the local highway network at the beginning and end of the school day, arising from children attending Crossley Fields junior and infants school, being dropped-off and collected. The submitted Transport Assessment (TA) fails to recognise the extent of on-street parking in the vicinity of the site and the drastic effect that parking has on safety and operation of the local highway network. A survey of on-street parking adjacent to the Crossley Fields school and the application site was therefore undertaken by Save Mirfield on Wednesday 28 January 2026 to enable the effects of on-street parking to be considered further.

- 4.4.2 The survey area is shown on the plan below and includes Woodward Court, sections of Wellhouse Lane to the north and south of Woodward Court, as well as Hepworth Lane and sections of Lockwood Avenue. The parking survey involved an enumerator recording the number of vehicles parked on-street at 5 minute intervals from 08:00-09:15 hours and from 14:45-16:00 hours. The survey area was divided into 7 'beats' and 15 survey areas, with the number of parked vehicles recorded separately for each area. The results of the survey are indicated in tables 4.1 and 4.2 below.
- 4.4.3 The survey demonstrates a substantial increase in demand for on-street parking at the beginning and end of the school day, with key facts set out below:
- Peak on-street parking demand is at 8:45am and 3:20pm when 89 vehicles were parked on-street in the morning period and 124 vehicles were parked on-street in the afternoon period.
 - In the morning period, 57 more vehicles are parked on-street at 8:45am than at 9:15am and in the afternoon period 84 more vehicles are parked on-street at 3:20pm than at 3:55pm. Allowing a 6 metre edge of carriageway length per vehicle, this equates to an additional 342 metres of parked vehicles in the morning period and an additional 504 metres of parked vehicles in the afternoon period
 - The survey demonstrates a major increase in on-street parking on Woodward Court, which is proposed as access to the development, at the beginning and end of the school day. In the morning period 2 parked vehicles were recorded at 8:00am with 15 parked vehicles recorded at 8:45am. In the afternoon period 3 parked vehicles were recorded at 4:00pm with 31 vehicles recorded at 3:20pm.
- 4.4.4 The survey confirms that Woodward Court is used extensively for school related parking. Woodward Court is regarded by parents as a preferred on-street parking location as it is close to the pedestrian access to the school on Wellhouse Lane. Drivers will seek to park on Woodward Court, u-turning to park elsewhere if no space is available. The surveys also confirm extensive additional on-street parking at the beginning and end of the school day on Wellhouse Lane, to the north and south of Woodward Court and on Lockwood Avenue.



Beat	Area	Number of Vehicles Parked															
		08:00	08:05	08:10	08:15	08:20	08:25	08:30	08:35	08:40	08:45	08:50	08:55	09:00	09:05	09:10	09:15
1	Lockwood Avenue Both Sides - from Wellhouse Lane to lamp post at No21.	10	11	11	11	11	11	12	13	16	22	15	11	9	10	10	10
1	Wellhouse Lane West - between Lockwood Avenue and Jenny Lane	0	0	0	0	1	1	2	3	3	3	3	2	1	1	1	1
1	Wellhouse Lane East - between Lockwood Avenue and Jenny Lane	3	3	3	3	5	5	5	5	5	7	6	3	3	3	3	3
2	Wellhouse Lane West - between main School Access and Lockwood Avenue	5	7	7	7	8	8	8	11	12	14	11	8	7	5	4	4
2	Wellhouse Lane East - between main School Access and Lockwood Avenue	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
3	Wellhouse Lane West - between Woodward Court and main School Access	1	1	3	3	2	2	3	3	3	3	3	2	2	2	3	2
3	Wellhouse Lane East - between Woodward Court and main School Access	0	0	0	0	0	0	2	3	3	4	5	1	0	0	0	0
4	Woodward Court North	0	0	0	0	2	2	4	5	6	7	6	2	1	0	0	0
4	Woodward Court South	2	3	2	2	2	3	3	5	7	8	5	5	3	2	2	2
5	Wellhouse Lane West - between Woodward Court and northern boundary of Playing Field	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Wellhouse Lane East - between Woodward Court and northern boundary of Playing Field	0	0	0	2	3	3	6	3	3	4	2	1	0	0	0	0
6	Wellhouse Lane West - between Hepworth Lane and northern boundary of Playing Field	3	3	3	3	3	3	3	3	2	2	2	2	2	2	2	2
6	Wellhouse Lane East - between Hepworth Lane and northern boundary of Playing Field	3	3	3	3	4	3	3	7	8	10	6	4	4	4	3	3
7	Hepworth Lane North	2	1	1	1	1	1	2	1	1	1	1	1	1	1	1	1
7	Hepworth Lane South	3	2	2	2	2	2	3	2	2	2	2	2	2	2	2	2
	Total	34	36	37	39	46	46	58	66	73	89	69	46	37	34	33	32

Table 4.1 Save Mirfield Parking Survey – Morning Period

Beat	Area	Number of Vehicles Parked															
		14:45	14:50	14:55	15:00	15:05	15:10	15:15	15:20	15:25	15:30	15:35	15:40	15:45	15:50	15:55	16:00
1	Lockwood Avenue Both Sides - from Wellhouse Lane to lamp post at No21.	11	13	13	18	20	21	20	20	13	9	8	9	8	9	8	8
1	Wellhouse Lane West - between Lockwood Avenue and Jenny Lane	2	2	2	4	4	5	5	5	3	2	2	2	2	2	1	1
1	Wellhouse Lane East - between Lockwood Avenue and Jenny Lane	4	4	5	6	7	6	7	7	3	2	2	2	2	2	2	2
2	Wellhouse Lane West - between main School Access and Lockwood Avenue	13	15	16	16	16	16	17	16	15	7	7	9	10	9	10	10
2	Wellhouse Lane East - between main School Access and Lockwood Avenue	2	2	2	2	2	2	2	2	3	1	1	1	1	1	1	1
3	Wellhouse Lane West - between Woodward Court and main School Access	4	4	5	5	4	4	7	5	3	3	3	3	3	3	3	4
3	Wellhouse Lane East - between Woodward Court and main School Access	0	0	0	0	1	1	2	2	2	0	0	0	0	0	0	0
4	Woodward Court North	5	5	7	7	8	8	8	10	9	0	0	0	0	0	0	0
4	Woodward Court South	5	6	8	9	11	15	17	21	14	3	3	3	3	3	3	3
5	Wellhouse Lane West - between Woodward Court and northern boundary of Playing Field	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1
5	Wellhouse Lane East - between Woodward Court and northern boundary of Playing Field	5	6	6	6	7	7	7	7	7	0	0	0	0	0	1	1
6	Wellhouse Lane West - between Hepworth Lane and northern boundary of Playing Field	7	7	7	7	7	7	9	9	6	6	4	4	3	3	2	2
6	Wellhouse Lane East - between Hepworth Lane and northern boundary of Playing Field	7	9	12	13	12	13	13	14	13	3	3	4	4	4	4	4
7	Hepworth Lane North	1	1	1	1	2	2	3	5	5	2	2	2	2	2	2	2
7	Hepworth Lane South	2	2	2	2	2	2	2	1	1	1	1	1	2	2	2	2
	Total	68	76	86	96	103	109	119	124	97	39	36	40	40	41	40	41

Table 4.2 Save Mirfield Parking Survey – Afternoon Period

- 4.4.5 Photograph 5 below shows on-street parking on both sides of Woodward Court, with vehicles obstructing the footway and prejudicing the safety of pedestrians. During the morning and afternoon pre-school and post-school periods Woodward Court is effectively reduced to one-way operation and can become grid-locked, with vehicles entering Woodward Court obstructing those exiting and vice versa.
- 4.4.6 The safety hazards facing pedestrians is illustrated in Photograph 6. A group of school children and parents is shown crossing Woodward Court after leaving school, with parked vehicles and traffic on Woodward Court creating pedestrian vehicle conflict and a hazardous environment for vulnerable road users. In such circumstances Woodward Court cannot be considered a safe and satisfactory means of access to the development now proposed, with the additional traffic generated by the proposed development prejudicing the safety of children attending Crossley Fields Junior and Infants School.



Photo 5. Traffic Congestion on Woodward Court



Photo 6. Pedestrian Vehicle Conflict At the Junction of Woodward Court and Wellhouse Lane

Photographs Courtesy of

5 COMMENTS ON THE BELLWAY TRANSPORT ASSESSMENT

5.1 Introduction

- 5.1.1 This section of the report comments on the Transport Assessment submitted as part of the Bellway Homes planning application.

5.2 Existing Traffic Flows

- 5.2.1 Section 2.6 of the submitted Transport Assessment (TA) lists traffic surveys undertaken by the applicant on Wednesday 18 June 2025, with the survey periods indicated as being from 07:00-10:00 and from 16:00-19:00 hours. The results of these surveys are then set out diagrammatically in figures 100 and 101 of the TA.
- 5.2.2 Paragraph 2.6.2 the TA correctly identifies the AM peak hour as being from 08:00-09:00 however the PM peak hour is indicated as being from 16:00-17:00, whereas traffic volumes in the local area in the period 15:00-16:00 are much higher. The PM peak hour has therefore not been correctly identified and data for the correct PM peak hour (15:00-16:00) not collected in the surveys.
- 5.2.3 Table 5.1 below sets out traffic flows on Wellhouse Lane, to the north and south of Woodward Court from the 2025 surveys, taken from figures 100 and 101 of the submitted TA. Traffic data from the TA submitted as part of the 2017 planning application is set out in table 5.2, including data for 15:00-16:00 as well as the periods surveyed in 2025. It can be seen from table 5.2 that traffic on Wellhouse Lane is substantially higher in the period 15:00-16:00 than in the period from 16:00-17:00.
- 5.2.4 The submitted TA asserts (in para 2.6.5) incorrectly that traffic flows in 2025 are lower than those recorded in 2016. It can be seen by comparing table 5.1 (2025 surveys) and table 5.2 (2016 surveys) that weekday traffic on Wellhouse Lane in the periods from 08:00-09:00 and from 16:00-17:00 in 2025 is effectively the same as recorded in 2016.

Period	Northbound – North of Woodward Court	Southbound – North of Woodward Court	Two-Way – North of Woodward Court	Northbound – South of Woodward Court	Southbound – South of Woodward Court	Two-Way – South of Woodward Court
Hour Ending 09:00	75	125	200	80	130	210
Hour Ending 16:00	-	-	-	-	-	-
Hour Ending 17:00	57	31	88	52	23	75

Table 5.1 Vehicle Flows on Wellhouse Lane (2025)

Source: Transport Assessment produced by Optima Consultants as part of the 2025 Planning Application (Ref: 2025/93335)

Period	Northbound – North of Woodward Court	Southbound – North of Woodward Court	Two-Way – North of Woodward Court	Northbound – South of Woodward Court	Southbound – South of Woodward Court	Two-Way – South of Woodward Court
Hour Ending 09:00	113	78	201	131	71	202
Hour Ending 16:00	65	75	140	73	96	169
Hour Ending 17:00	48	39	87	47	34	81

Table 5.2 Vehicle Flows on Wellhouse Lane (2016)

Source: Appendix C of Transport Assessment produced by AMA Consultants as part of the 2017 Planning Application (Ref: 2017/93935). The figures in the table above are weekday average flows recorded by Automatic Traffic Count.

5.3 On-Street Car Parking

- 5.3.1 The submitted Transport Assessment (TA) fails to recognise the extent of on-street parking in the vicinity of the site and the drastic effect that parking has on safety and operation of the local highway network. Section 3.3.5 of the TA notes that some on-street parking takes place on Woodward Court whilst asserting that 'Woodward Court can satisfactorily accommodate on-street parking as well as maintaining access'. Photographs in section 4 of this report show on-street congestion on Woodward Court with cars parked on both sides of the road. It is clear that Woodward Court does not provide satisfactory access to the proposed development, with conflicts between pedestrians, parked vehicles and moving vehicles clearly evident.

5.4 Trip Generation

- 5.4.1 The current application proposes a development of 75 dwellings. It is therefore self-evident that this development would generate more traffic than the development of 61 dwellings proposed in the 2017 application, which was refused on highway grounds. In the absence of convincing area-wide mitigation there is therefore a strong presumption that the current application should also be refused on highway grounds.
- 5.4.2 The trip rates and estimates of traffic generation indicated in the current application are considered unrealistically low. The submitted TA indicates (in table 5.2) two-way morning peak hour trip rates of 0.526 vehicles per dwelling in the morning peak hour and 0.504 vehicles per dwelling in the evening peak hour, whereas Council Officers indicated when considering the 2014 and 2017 applications that based on their local experience peak hour trip rates of 0.7 vehicles per dwelling are appropriate in Kirklees.
- 5.4.3 Table 5.3 below sets out data from the 2021 census for Household Car and Van Availability. The table sets out data for the Kirklees 020 Super Output Area, within which the application site is located, (image 5.1 of the TA) as well as for Kirklees as a whole, the Yorkshire and Humber region and nationally for England. It is clear from the table that the proportion of households with no car or van in Kirklees 020 (14.8%), is much lower than for Kirklees as a whole (22.7%) as well as regionally and nationally (24.2% and 23.5%). Similarly, the proportion of households in Kirklees 020 with 2 or more cars or van is much higher than for Kirklees as a whole as well as regionally and nationally, such that low vehicle trip rates for the development are unlikely to be appropriate.

Number of cars or vans	Kirklees Mid Layer Super Output Area 020		Kirklees Local Authority Area		Yorkshire and The Humber		England	
	Number of Households	%	Number of Households	%	Number of Households	%	Number of Households	%
Total: All households	2,752	100.0	177,989	100.0	2,330,660	100.0	23,436,085	100.0
No cars or vans in household	408	14.8	40,356	22.7	564,965	24.2	5,516,098	23.5
1 car or van in household	1,134	41.2	73,901	41.5	980,137	42.1	9,674,645	41.3
2 cars or vans in household	922	33.5	48,622	27.3	600,010	25.7	6,106,970	26.1
3 or more cars or vans in household	288	10.5	15,110	8.5	185,548	8.0	2,138,372	9.1

Table 5.3 Household Car or Van Availability

Source: 2021 Census Table TS045 (Car or Van Availability)

5.5 Accessibility

5.5.1 Accessibility and the effectiveness of the proposed Travel Plan are further issues relevant to trip rates for the proposed development. The submitted TA refers indicates the nearest bus stops as being on Shillbank Lane, 400 metres from the centre of the site, with the walking route to the bus stops via Hepworth Lane. Whilst a short section of new footway is proposed on Hepworth Lane, there is no footway on the narrow section of Hepworth Lane, through to the bus stops at the junction with Shillbank Lane. The same walking route is also identified as a pedestrian route to Shillbank Stores on Shillbank Lane, which is one of the nearest shops. The pedestrian route to the bus stops and the shop is however likely to be considered unacceptable on road safety grounds by most pedestrians, with residents instead resorting to car borne travel.

5.5.2 The TA indicates recognises travel to work as a key component of peak period travel, with the submitted Travel Plan targeting a 10% reduction in travel to work by car or van. The Travel Plan however fails to identify any measures or incentives that would materially affect modal split. The Travel Plan also does not target any increase in bus travel, presumably recognising the poor accessibility to public transport, with resulting reliance on car based travel.

5.5.3 It is anticipated therefore that residents would continue to use the mode of transport they consider most appropriate and as evidenced by the above average levels of car and van availability the use of the low trip rates set out in the TA are unlikely to be appropriate. The peak hour trip rate of 0.7 vehicle trips per dwelling favoured previously by Council Officers should therefore be used to provide a more realistic assessment of traffic generation.

5.6 Traffic Distribution

5.6.1 The anticipated distribution of traffic generated by the proposed development is detailed in table 5.3 and figure 150 of the submitted TA. Significant proportions of generated traffic are indicated as using sections of the local highway network that are already congested at the beginning and end of the school day and locations with narrow roads and poor visibility and inadequate footway provision:

- 58.1% of generated traffic movements are indicated via Woodward Court and Wellhouse Lane North, passing Crossley Fields School,

- 24.4% of traffic arriving at the Woodward Court access is assigned westbound on Hepworth Lane, which is narrow in places, without appropriate footways and then turning right at the junction with Wellhouse Lane where visibility is severely restricted
- A significant proportion of generated traffic is shown using Wellhouse Lane to the south of Woodward Court, which is narrow, congested and lacking suitable footways, with proportions varying by location and direction.

5.7 Unacceptable Road Safety Impacts

5.7.1 Paragraph 6.4.1 of the submitted TA comments on the 'materiality' of additional traffic flows generated by the proposed development. A 'threshold figure' of 30 vehicle movements per hour is referred to which is taken from paragraph 2.11 of 'Guidance on Transport Assessment' (GOTA) published by Government in March 2007. When considering operational impacts, such as the effect of additional traffic on queue lengths at junctions, the figure of 30 vehicle movements per hour remains in common use, paragraph 2.11 of GOTA referring to this as a 'useful point of reference'. When considering impacts on road safety however, normal practice is that no additional traffic should be considered acceptable due to the resulting increased risk of road traffic accidents.

5.7.2 In areas adjoining the site, there are operational impacts where peak period congestion is would be adversely affected by traffic generated by the proposed development which have not been properly evaluated in the submitted TA, as considered further in section 5.9 below. Unacceptable road safety impacts however arise continuously on a 24/7 basis from increased traffic at junctions with restricted visibility, on narrow roads where oncoming vehicles are unable to pass and locations with inadequate footway provision where pedestrians are at risk from passing traffic. With such issues it would be entirely inappropriate to consider a certain volume of additional traffic as being acceptable, but no more above an arbitrary threshold. The appropriate response when dealing with road safety is therefore to recognise as the Council have done previously that 'any measurable increase in traffic' would be unacceptable.

5.7.3 The distinction between operational and road safety impacts is clear in paragraph 116 of the National Planning Policy Framework (NPPF) which refers separately to 'unacceptable impacts on highway safety' and 'residual cumulative impact on the road network' as follows:

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

5.7.4 The unacceptable road safety impacts recognised by Highways Officers, with which Save Mirfield fully agree, are as follows:

- Woodward Court - is proposed for site access and is congested with parked vehicles at the beginning and end of the school day with resulting pedestrian vehicle conflict
- Visibility onto Wellhouse Lane from Woodward Court - visibility to the left is sub-standard for a driver exiting Woodward Court onto Wellhouse Lane
- Wellhouse Lane (north of Woodward Court) – conflicts between pedestrians, parked vehicles and moving vehicles at the beginning and end of the school day
- Wellhouse Lane (south of Woodward Court) – conflicts between pedestrians, parked vehicles and vehicular flows at the beginning and end of the school day. The section between Hepworth Lane and Flash Lane is also not wide enough for two-way traffic with only a narrow footway, with resulting pedestrian vehicle conflict.
- Hepworth Lane – pedestrian vehicle conflict on narrow sections with inadequate footway provision and additionally concerns regarding operation of the proposed egress which would be prejudiced by nearby on-street parking.

5.8 Rat Running

5.8.1 The applicants assert that some existing traffic heading southbound on Wellhouse Lane will be drawn through the new development such that traffic flows on Wellhouse Lane south of Woodward Court would be reduced. With the existing peak period congestion on Woodward Court, the route through the site is however unlikely to be attractive, as to comply with the Council's Highway Design Guide a new street through the development would need to be designed to constrain traffic speeds to below 20mph.

- 5.8.2 If the applicants are correct and the street through the development became an attractive alternative route, rat-running during off-peak periods, when roads in the vicinity of the site are not congested would be a concern. In such a scenario additional non-local traffic could be drawn from a wider area, from Greenside for example leading to an increase in traffic on Wellhouse Lane, passing the Crossley Fields school, which would be unacceptable from a road safety viewpoint.

5.9 Operational Assessment

- 5.9.1 The operational analysis provided in the submitted TA is considered unreliable. The results of the base year analysis indicate only limited queuing at the junctions analysed which is not consistent with observations on site. The base year junction assessment models should be calibrated against queue lengths observed on site, which they have not been. With uncalibrated base year models, the future year assessments are unduly optimistic and cannot be relied upon. Furthermore, and as mentioned previously, the evening peak hour has not been correctly identified and trip rates used in the TA are considered unrealistically low. As such the operational assessment produced in the TA is considered unreliable.

5.10 Transport Assessment

- 5.10.1 The submitted Transport Assessment is considered unreliable for the following main reasons:
- The PM peak hour has not been correctly identified. The TA refers to the PM peak hour as being from 4pm to 5pm, whereas traffic flows in the local area are higher from 3pm to 4pm.
 - Trip rates used in assessing traffic generation are too low. With above average car availability in the local area, and limited accessibility to public transport the development would be reliant on car based travel such that the trip rate of 0.7 vehicle trips per hour, identified by Council Officers when considering previous applications should be used.
 - The operational analysis is considered unreliable as the assessment models have not been calibrated against observed queue lengths, such that future year assessments are unduly optimistic and cannot be relied upon

6 CONCLUDING REMARKS

- 6.1.1 The proposed development of 75 dwellings would give rise to **unacceptable impacts on road safety throughout the local area**. Woodward Court is not suitable for access to the proposed development due to on-street parking and pedestrian vehicle conflict at the beginning and end of the school day. The proposed egress onto Hepworth Lane is also unacceptable on road safety grounds as operation would be prejudiced by restricted road width and on-street parking nearby.
- 6.1.2 Visibility to the left at the junction of Wellhouse Lane and Woodward Court is sub-standard with the intensification of use arising from the proposed development resulting in increased risk of collision. Whilst the applicant has identified traffic calming measures with a view to mitigating this issue, the proposed traffic calming scheme is considered unacceptable as based on Government guidance the proposals may result in **increased traffic speeds on the Crossley Fields school frontage**.
- 6.1.3 The proposed development would result in an undesirable increase in traffic on Wellhouse Lane, passing Crossley Fields School, leading to increased pedestrian vehicle conflict. An undesirable intensification of Wellhouse Lane to the south of the site would also result, including the junction with Hepworth Lane where **visibility is severely restricted**. The resulting increase in traffic on the narrow section of Hepworth Lane, where footway provision is inadequate would also be unacceptable on road safety grounds.
- 6.1.4 Previous applications for residential development on the site were refused for highway safety reasons, which have not been resolved, with the expectation that the current application should be similarly refused. The **unacceptable impacts on road safety** have been shown in this report to **significantly and demonstrably outweigh the benefits** of granting consent. The Transport Assessment submitted as part of the planning application has been shown to be unreliable and does not provide an objective assessment of the impacts arising from the proposed development
- 6.1.5 The development now proposed is therefore contrary to Local Plan Policy LP21 and paragraph 116 of the National Planning Policy Framework. Accordingly, **planning permission should be refused on highway grounds**, consistent with the refusal of applications for residential development submitted in 1998, 2014 and 2017.

Appendix A

**KIRKLEES METROPOLITAN COUNCIL
INVESTMENT & REGENERATION SERVICE**

DEVELOPMENT MANAGEMENT

Town and Country Planning Act 1990 (as amended) – SECTION 70

DELEGATED DECISION TO DETERMINE PLANNING APPLICATIONS

Reference No: 2017/62/93935/E

Site Address: Land off, Woodward Court, Mirfield

Description: Erection of 61 dwellings with associated access, drainage, open space and landscaping

Recommending Officer: Matthew Woodward

DECISION - Refused

I hereby authorise the refusal of this application for the reasons set out in the agenda of the Strategic Planning Committee dated 25/10/18 and the committee decision authorisation sheet annexed below in respect of the above matter.

David Wordsworth

AUTHORISED OFFICER

Date: 29-Oct-2018

Decision Authorisation – Committee Decision

Committee: Strategic Planning Committee

Date of Committee: 25th October 2018

Application Number: 207/93935

Officer Recommendation: Approve subject to conditions and S106 Agreement

Committee Decision: Refuse

Summary of Committee Decision – Committee did not agree with the officer recommendation and considered that the development of Provisional Open Land (POL) and a future Safeguarded designation was unacceptable in principle.

Members also considered that the scheme represented unacceptable highway safety impacts.

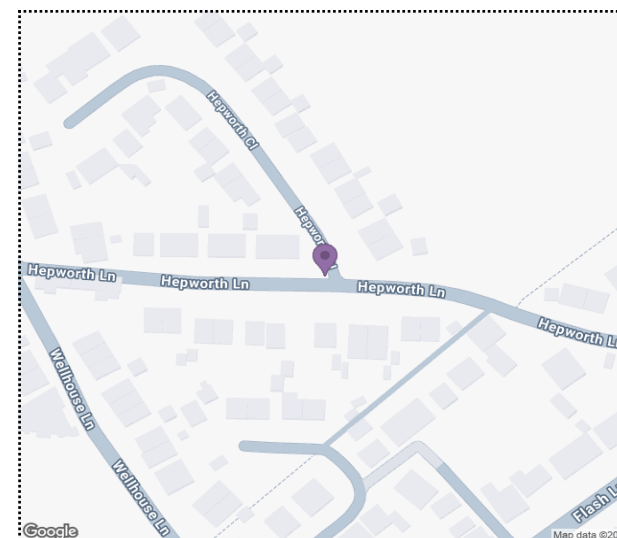
- 1) The site is designated as Provision Open Land in the Kirklees Unitary Development Plan, the proposed development conflicts with Unitary Development Plan policy D5. The site is designated as Safeguarded in the Kirklees Publication Draft Local Plan which commands very significant weight as a material planning consideration in the determination of this application. The proposal conflicts with policy PLP6 of the Kirklees Publication Draft Local Plan as permanent forms of development, such as that proposed in this application, which prejudice the long term development options of the land, should only be considered through a change to the allocation through a review of the local plan. The benefits associated with the provision of housing in this case are significantly and demonstrably outweighed by the harm arising from the conflict with the current Provisional Open Land Designation and the emerging Safeguarded designation, contrary to paragraph 139(d) of the National Planning Policy Framework.
- 2) The proposed development would lead to additional traffic impacts on an already constrained local highway network which, by virtue of the existing network of narrow roads, the close proximity of the proposal to the existing school (Crossley Fields Junior and Infant School), and the substandard visibility at the junction of Woodward Court and Wellhouse Lane, would result in an unsafe development which would fail to acceptably mitigate the degree of conflict between all users. The proposed development would lead to an unacceptable highway safety impact, contrary to paragraph 109 of the National Planning Policy

Appendix B



Validated Data

Crash Date:	Thursday, October 20, 2022	Time of Crash:	16:17:00	Crash Reference:	2022131232740
Highest Injury Severity:	Slight	Road Number:	U	Casualties:	1
Highway Authority:	Kirklees			Vehicles:	1
Local Authority:	Kirklees			OS Grid Reference:	420922 420922
Weather Description:	Raining without high winds				
Road Surface Description:	Wet or Damp				
Speed Limit:	20				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	Unknown				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Give way or uncontrolled				



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Validated Data

Crash Date:

Thursday, October 20, 2022

Time of Crash: 16:17:00

Crash Reference: 2022131232740

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)	10	Male	36 - 45	Vehicle is moving off	Front	Unknown	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Pedestrian	Male	11 - 15	In carriageway, crossing elsewhere	Crossing from driver's offside

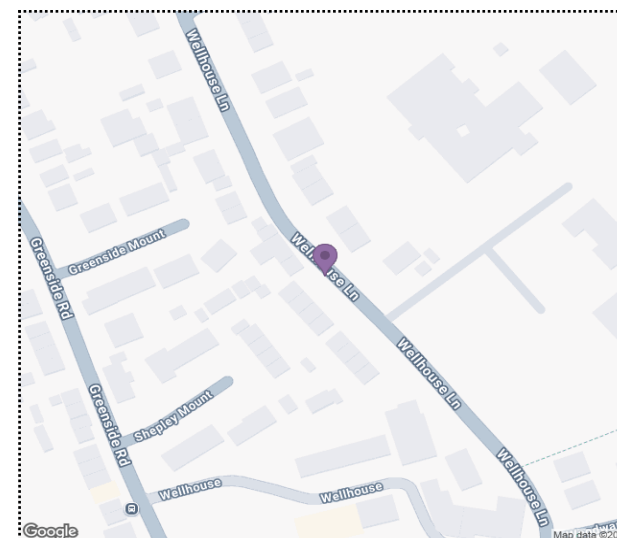
For more information about the data please visit: www.crashmap.co.uk/home/faq

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Validated Data

Crash Date:	Wednesday, May 3, 2023	Time of Crash:	15:10:00	Crash Reference:	2023131303874
Highest Injury Severity:	Slight	Road Number:	U	Casualties:	1
Highway Authority:	Kirklees			Vehicles:	2
Local Authority:	Kirklees			OS Grid Reference:	420663 421227
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	30				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	Not at or within 20 metres of junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Unknown				



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Validated Data

Crash Date:

Wednesday, May 3, 2023

Time of Crash: 15:10:00

Crash Reference: 2023131303874

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)	1	Unknown	Unknown	Vehicle is passing a stationary vehicle on its offside	Offside	Unknown	None	None
2	Car (excluding private hire cars 2005 onwards)	11	Unknown	Unknown	Vehicle is parked in the carriageway	Nearside	Unknown	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
2	1	Slight	Pedestrian	Female	26 - 35	In carriageway, not crossing	In carriageway, stationary - not crossing (standing or playing)

For more information about the data please visit: www.crashmap.co.uk/home/faq

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