Consultation Response from KC Highways Development Management		
2026/90271 Pilgrim Foodservice, Forge Lane, Thornhill Lees		
Change of use of existing industrial storage unit to wholesale supermarket, erection of single-storey extension, formation of mezzanine level, installation of canopy over customer entrance, external re-cladding and associated works		
Date Responded: 25/06/26	**Responding Officer:** M Zenner	**Responding Ref:** 15-1SW/3

RECOMMENDATION: HDM considers there is insufficient information to assess the potential highway impacts of the proposals fully.

Further information / amendments are required regarding the following issues, which are detailed in the main body of the report:

- Further information and consideration of the site access bearing in mind the link to the neighbouring site (exit only) as existing;
- Improved pedestrian / cycle access arrangements are required, including improved routes within the site;
- There are concerns that the intensification of use of the surrounding footways and highway could cause safety conflicts both within the site and at the access points onto Forge Lane.
- Further supporting information is required in relation to car parking provision (the scope of the methodology and surveys to be agreed in advance with HDM);
- Clarification is required over proposed floorspace and staff numbers;
- The provision of a TA / TS is required to include multi-modal trip generation for existing and proposed uses, accident statistics, junction assessments and a review of the sites accessibility including an audit of the existing pedestrian and cycle provision within the vicinity of the site should be provided;
- Further information on servicing and waste management at the site should be provided including swept paths;
- Clarification over the boundary treatment is required;
- Visibility splays to meet MfS standards should be provided;
- Improved bus stop provision should be investigated with WYCA.

Development Overview:

It is HDM's understanding that the proposals are for the change of use of the existing industrial storage unit to a wholesale supermarket, with the erection of a single storey extension, the formation of a mezzanine level, the installation of a canopy over the customer entrance, external re-cladding and associated works.

The submitted application form details the existing floorspace within the industrial storage unit as 1098 sq m and the proposed floorspace as 1398 sq m; an uplift of 300 sq m. But there appears to be some confusion on the application form as it lists 1098 sq m tradable floor area of sui generis floorspace.

The opening hours of the store are listed as 8am to 10pm Monday to Sunday.

No details are provided in relation to the number of staff proposed to work at the site, which should be clarified.

The existing site plan indicates two existing access points to the site; the first from Forge Lane approximately 60m west of the junction with station road. This entrance is signed as 'exit' only and HDM understands it previously operated alongside the access on Forge Lane located immediately to the west by Tarmac. It is noted that the entrance here has been closed recently and a fence installed to separate the two sites.

The second access point shown on the existing site plan is shown from Station Road. HDM has reviewed this location and cannot see any evidence of an existing access point. There is no dropped kerb or engineered vehicle access point present and there does not appear to be a pedestrian link into the site at this point.

Forge Lane is a local distributor road that has a circa 7.2m wide carriageway and circa 1.8m footways on both sides. It has street lighting and is subject to a 30mph speed limit and has road humps to calm traffic along its length. Approximately 60m northeast of the Forge Lane site access, Forge Lane joins the B6117 Station Road / B6117 Thornhill Road / B6409 Savile Road via a double mini-roundabout junction that provides access to Dewsbury Town Centre to the north. Approximately 700m to the southwest, Forge Lane joins Lees Hall Road / Raventhorpe Road via a mini-roundabout junction, which is proposed to be upgraded as part of the Dewsbury Riverside Phase 1 development (planning application reference 2021/93689).

The proposals include 40 no customer parking spaces adjacent to the Forge Lane frontage to the east of the site access. To the west side of the building 1 accessible parking space, 1 EV charging space and 3 staff parking spaces are provided. Furthermore, there is an area adjacent to the Forge Lane frontage to the west of the site access detailed as 'future additional parking area (as required) but no layout has been provided, just a dashed line outlining the location.

The proposed site plan indicates a delivery entrance at the rear of the building and indicates that the delivery access route travels past the northeast corner of the building and therefore it is anticipated that deliveries will be made via the Forge Lane access. The submitted floorplans indicate that the rear part of the building would be used as a storage area. The proposed building alterations include a mezzanine floor which is detailed as provided a prayer room, a kitchen, an office, toilets and two store rooms.

Reference to Plans/Documents:

- Application Form;
- Design and Access Statement;
- Location Plan dated 29th January 2026;
- Existing Elevations – Dwg 25C31-FBA-XX-ZZ-DR-A-0210 Revision P01;
- Existing GA Floor Plan - Dwg 25C31-FBA-XX-ZZ-DR-A-0210 Revision P01;
- Proposed GA Floor Plan – Dwg 25C31-FBA-XX-ZZ-DR-A-2001 Revision P01;
- Existing Site Plan – Dwg 25C31-FBA-XX-ZZ-DR-A-0200 Revision P02;
- Proposed Elevations – Dwg 25C31-FBA-XX-ZZ-DR-A-2100 Revision P01;
- Proposed Site Plan – Dwg 25C31-FBA-XX-ZZ-DR-A-2000 Revision P03.

Policy:

Local Plan Policies – LP19, LP20, LP21, LP22, LP23, LP24; Kirklees Highway Design Guide SPD.

Traffic Impact/Network Assessment:

HDM note that no Transport Statement (TS) or Transport Assessment (TA) has been submitted as part of the application. The submission simply states within the Design & Access Statement that 'Wholesale Supermarket operations are comparable in trip characteristics to industrial storage and distribution uses, with a focus on servicing and bulk purchasing rather than high frequency short stay customer trips'.

However, no evidence has been supplied to demonstrate this. HDM therefore feels there is insufficient information to assess the potential highway implications of the proposals. Clarification is also rquired of the proposed use class and associated floor areas, particularly if a more open Class E / retail use were proposed (e.g. not sui generis for all floor area, as currently suggested).

Trip generation for the existing and proposed uses should be supplied and the scope of a TS or TA including the methodology and data to be used should be agreed with HDM in advance of submission.

The DfT's 'Travel Plans Transport Assessments And Statements' document sets out that 'the scope and level of detail in a Transport Assessment or Statement will vary from site to site but the following should be considered when settling the scope of the proposed assessment:

- information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport)
- information about neighbouring uses, amenity and character, existing functional classification of the nearby road network;
- data about existing public transport provision, including provision/ frequency of services and proposed public transport changes;
- a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;
- an assessment of trips from all directly relevant committed development in the area (ie development that there is a reasonable degree of certainty will proceed within the next 3 years);
- data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network;
- an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 5-year period if the proposed site has been identified as within a high accident area (HDM would advise a full collision assessment using Key Accidents should be undertaken to provide a map and full narrative data with details of locations, severities, dates, times, road conditions, type of road user and consideration of causation);
- measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;
- a description of parking facilities in the area and the parking strategy of the development;
- ways of encouraging environmental sustainability by reducing the need to travel; and
- measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads.

It is HDM's view that the proposals should follow a vision led approach and provide high quality routes and connections for active travel. Consideration should be made to the existing highway arrangements within the vicinity of the site and how the proposals will tie into those arrangements and any necessary amendments that will be required.

Vehicular Access:

The existing site plan indicates two existing access points to the site; the first from Forge Lane approximately 60m west of the junction with station road. This entrance is signed as 'exit' only and HDM understands it previously operated alongside the access on Forge Lane located immediately to the west by Tarmac. It is noted that the entrance here has been closed recently and a fence installed to separate the two sites. HDM requests further clarification in regards to the use of the proposed and neighbouring access to ensure the proposals do not affect the neighbouring use and to ensure that the proposed access arrangements are fit for purpose.

The proposed access onto Forge Lane is proposed to be retained as existing. Whilst no dimensions have been provided it appears to be a 6.5m wide access route for vehicles with a footway on either side that extends for approximately 12m from the soft landscaped verge boundary into the site before ending abruptly. The existing and proposed plans do not reference the existing boundary wall along the Forge Lane frontage either side of the existing access which should be clarified. The footway on the east side is approximately 4m wide and the footway on the west side of the access is approximately 3m wide.

No information regarding the size of vehicles that will be required to service the site has been provided, and no swept paths have been demonstrated to ensure they can access and egress the site acceptably from a highway safety perspective; which should be addressed. Swept paths of the turns from Forge Lane should be provided to ensure that turning vehicles do not impede opposing traffic movements. In addition to this, there are regularly vehicles parked on-street on Forge Lane in the vicinity of the site access which could have an impact on the operation of the access; which should be considered.

No visibility splays have been provided as part of the submission which should be provided. 2.4m x 43m should be provided in accordance with the requirements set out in Manual for Streets, vertical visibility should be considered alongside horizontal due to the change in levels from within the site down onto Forge Lane and should consider the boundary treatment, including if the existing boundary wall is to be maintained as this may impede the visibility of small children walking along the rear of the footway.

The second access point shown on the existing site plan is shown from Station Road. HDM has reviewed this location and cannot see any evidence of an existing access point. There is no dropped kerb or engineered vehicle access point present and there does not appear to be a pedestrian link into the site at this point. For an access on Station Road to be acceptable it would need to be located as far away from the mini-roundabout as possible to ensure blocking back to the roundabout will not occur, and a right turn lane would be required. However, HDM would not support two inter-connected accesses for the site, as it may encourage drivers to cut through the site, to avoid the traffic queues that occur on Station Road and Forge Lane during peak periods.

Pedestrian Access:

The existing footways on Station Road and Forge Lane adjacent to the site are approximately 1.8m wide and in some locations narrower where sign poles / street furniture is present. There are no verges present to provide a buffer between pedestrians and vehicles. At times these footways can be busy; especially at the beginning and end of the school day. HDM would recommend that as part of the proposals that the existing footways are widened to 3m to provide further space and separation between large vehicles accessing the site and pedestrians using the footways. Dropped kerbs and tactile paving should be provided across the site access, but HDM will further consider the requirements once the provision of trip generation data and servicing data has been submitted. Pedestrian crossing improvement should also be investigated on the local highway network.

Pedestrian access within the site is proposed via the two 12m length footways located either side of the existing Forge Lane vehicle access. HDM is concerned that the proposed arrangements do not provide a safe accessible arrangement for pedestrians through to the entrance of the site from the site access. Furthermore, there is very little pedestrian infrastructure proposed to access the car parking spaces bearing in mind the delivery access route appears to route between the customer entrance and the customer car parking spaces. No safe and accessible pedestrian route appears to be provided for the accessible parking space, the EV charging space or the staff parking spaces which should be addressed also.

PROW:

There are a number of PROW's located within walking distance of the site, none are directly affected by the proposals but they do provide an effective off-road route through to Lees Hall Road and the River Calder. Connections in the vicinity include:

- DEW/117/40
- DEW/116/40
- DEW/117/30
- DEW/117/20
- DEW/117/10

Parking:

The proposed car parking provision is as follows:

A total of 45 car parking spaces, comprising:

- 40 standard spaces (2.4 x 4.8m)
- 1 accessible space;
- 1 Electric Vehicle Charging space;
- 3 staff parking spaces;
- An area marked 'future additional parking area (as required)'.

Parking spaces are noted as 2.4m x 4.8m with 6m aisle widths, other than the accessible space which has approximately 1m aisles on two sides and to the rear. HDM require parking spaces to be 5m x 2.5m with 6m aisle widths. These slightly larger spaces are needed for retail uses due to the higher turnover of spaces. Accessible spaces should have a 1.2m aisle to one side and to the rear.

The Kirklees Local Plan states under Policy LP22: Parking: that car parking provision in new developments will be determined by the availability of public transport, the accessibility of the site, location of the development, local car ownership levels and the type, mix and use of the development. (Policy LP22). LP22 also states that new developments will incorporate flexibly designed and sufficient parking provision for private cars, considering a range of solutions. This is to provide the most efficient arrangement of safe, secure, convenient and visually unobtrusive car parking within a site, including a mix of on-street and off-street parking in accordance with current guidance. Policy LP22 also states that provision will be made to meet the needs of cyclists for cycling parking in new developments and that provision will be made to accommodate the needs of people with disabilities.

The Kirklees Highway Design Guide does not provide parking standards for uses other than residential. Therefore, HDM has calculated that on the basis of the proposed car parking provision of 45 spaces, which equates to 1 space per 31 sq m GFA (based on 1398 sq m). It is unclear whether this will be sufficient for a development of this type and scale, as no supporting information has been provided within the application. However, this level of provision seems low for a retail use such as this. As such, further information is required in relation to the proposed use and likely car parking demands to allow HDM to assess the potential highway impacts of the proposals. It is recommended that the applicant agrees the scope of any parking assessments / surveys with HDM in advance.

Cycling:

Policy LP22 states that provision will be made to meet the needs of cyclists for cycling parking in new developments

Whilst it is acknowledged that Kirklees Highway Design Guide does not provide cycle parking standards within it for uses other than residential; LTN 1/20 incorporates guidance on cycle parking standards on page 134 and sets out notional short stay and long stay standards for a range of uses.

Long stay provision should be made for staff in a secure covered lockable compound and short stay should be provided for customers. Suitable arrangements are demonstrated with LTN 1/20.

Whilst there is an unnamed store adjacent to the staff parking, it is not clear if this is proposed for staff use and no visitor/customer cycle parking is noted within the site.

The site is in a reasonable proximity of the Spen Valley Greenway NCN66 and therefore there are opportunities for staff or visitors to access the site via cycle.

Public Transport:

The closest bus stops to the site are located along Forge Lane and Station Road. The Forge Lane bus stops are provided with just one pole but are indicated as operating on both sides of the road, there are currently no shelters in place and the footway width isn't adequate to provide them. HDM feels widening the current footways to 3m would enable the provision of a shelter on the nearside bus stop. At present there are dropped kerbs across the Forge Lane arm of it's junction with Station Road but this uncontrolled facility would mean customers and staff taking a convoluted route to be able to cross to access the bus stop on the north side of Forge Lane which should be considered further. The applicant should consult with WYCA (HDM would also be pleased to be involved in these discussions) to see whether the bus stop(s) on Forge Lane can be relocated any closer to the site, which appears to be achievable.

The closest Station Road bus stop is located on the bridge and is provided solely with a pole. It appears there is limited scope for improvements or the provision of a shelter at this location due to the width of the footways and the existing structure.

The services on Forge Lane are stated to be infrequent but look to be hourly during the day. The services on Station Road are more frequent during daytime hours then appear to be hourly out of peak times.

HDM requires further information in regards to multi modal trip generation at the site in order to ascertain the required improvements necessary for a scheme such as this.

Servicing / Waste Management:

Limited details have been provided in relation to servicing or waste management which should be clarified. A delivery entrance is shown to the rear of the building and the north east corner of the building is annotated with 'delivery access route'. A refuse store is outlined at the rear of the building but no details have been provided in relation to the number and size of vehicles that will be required to service the site and no swept paths have been provided to demonstrate how the path of vehicles proposed to access and egress the site as well as passing through the site.

There is a need to accommodate the safe manoeuvring and turning requirements of larger vehicles, including those used for refuse collection, deliveries and emergencies. Therefore swept path analysis should be provided for vehicles that will be accessing the site.

Good practice should be followed when undertaking swept path analysis, including using appropriate design/ driven speeds and other parameters appropriate to the context of the analysis.

All schemes must incorporate reasonable tolerances and safety margins. A good starting point is to allow 0.5m clearance to kerbing or vertical obstructions on each side of the swept path.

Travel Plan:

Further information on multi modal trip generation at the site is required to ascertain if a Travel Plan would be required at the site.

Highway Boundary:

The development site boundary appears to encroach into the adopted highway (e.g. part of the verge immediately south of the Forge Lane / B6117 Station Road / B6117 Thornhill Road / B6049 Savile Road double mini roundabout junction). Therefore, the proposals need to exclude this area from the development. The plan below shows the extent of the existing highway:

Conclusion: There is insufficient information in order to assess the highway impacts of the proposals. Further information and amendments are required. See recommendation for further information.