

Consultation Response from KC Highways Development Management		
2026/90620 Central Warehouse, Bradford Road, Batley, WF17 5LW		
Demolition of existing building and erection of food/drink building with drive thru lane (Class E)		
Date Responded: 25/08/26	Responding Officer: M Zenner	Responding Ref: 13-10SE/9

RECOMMENDATION: HDM considers that whilst additional information has been provided it is not sufficient to overcome highways concerns in relation to the proposals and to comply with NPPF TR6.

Concerns remain that the layout does not work effectively, the proposed layout appears cramped and is likely to lead to conflicts within the site which will be exacerbated by the increase in trips and intensification of uses within the site. The proposed access arrangements would lead to all vehicles exiting through the PFS pumps and are likely to cause queuing within the site which could potentially block back onto Bradford Road impeding pedestrian and vehicular traffic and is not acceptable on highway safety grounds contrary to Local Plan Policy LP21 and NPPF TR3.

There is insufficient information provided to ascertain that adequate parking is provided within the site for the range of uses proposed; contrary to Local Plan Policy LP22 and NPPF TR2.

A vision-led approach that prioritises active-travel has not been demonstrated to comply with NPPF TR1 and TR4 or Local Plan Policy LP20.

Development Overview:

It is HDM's understanding that the existing site currently hosts a Petrol Filling Station and associated retail unit with additional facilities such as a jet wash and a vacuuming bay adjacent to the building to the south and there is an air/water point located to the north along the site boundary adjacent to two parcel lockers.

There is also an existing building located to the north of the retail building which is stated to be in commercial use, the building was formerly in use by B & D Bolts and has car parking to the front and rear of the site. There is a gated access to a neighbouring site that connects to the rear car park and a grassed area behind a retaining wall at the rear of the car park.

There are currently two vehicular access points at the site accessed from Bradford Road, the existing site layout plan indicates that these are an 'in' (northern access) and an 'out' (southern access) although HDM

is of the view that vehicles exiting the B & D Bolts site are more likely to exit from the northern access closest to their building rather than pass through the pumps at the Petrol Filling Station.

The proposals appear to involve the demolition of the existing commercial building to the north and to replace it with a 'drive thru' building. The building is located centrally within the space to the rear of the site with a vehicle loop around it and proposes car parking, EV charging and cycle parking. The proposals also appear to relocate some other uses within the site such as the vacuum bay and create additional car parking spaces.

The A652 - Bradford Road is an 'A' classified road subject to a 30mph speed limit. At this location on Bradford Road there are narrow cycle lanes on either side of the road, a single general traffic lane in either direction separated by a narrow area of hatching. There is a small refuge island and dropped kerbs located along the central area of the site between the two vehicular access points and a narrow right hand turn lane is located within the central hatching adjacent to both of the site accesses.

Reference to Plans/Documents:

- Proposed Layout – Dwg 251072 – 203E;
- Proposed Site Layout Swept Path Analysis Oil Tanker, 10m Rigid & Large Car – Dwg DTP/3707526/ATR001 Revision A;
- Proposed Site Layout, Proposed Highway Works – Dwg DTP/3707526/SK001 Revision A;
- Transport Statement dated June 2026;
- Road Safety Brief.

Policy:

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

Traffic Impact/Network Assessment:

HDM previously requested further information in regards to the existing level of trips at the site and the proposed level of trips. A Transport Statement (TS) has been submitted for the application which doesn't make reference to a vision led approach which is contrary to NPPF Policy TR1. 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 are required.

The TS supplied has attempted to provide an insight into existing and proposed trip generation at the site. However, the surveys provided do not appear to be multi-modal and therefore do not consider or provide details of those accessing the site via active travel or public transport modes.

The TS states that the existing industrial unit that is proposed for demolition stopped trading a number of years ago and that there is no survey data available for the vehicle trips to the site.

No survey data has been gleaned for the existing PFS and associated retail units which could be undertaken to provide robust data. However, a TRICS search has been undertaken for PFS with retail for town centre and edge of town centre sites during weekdays. A trip rate has been gleaned per filling bay and factored up to 8 filling bays to give a likely trip rate for the site. However, the data provided focusses on suggested AM and PM peak hours of 8-9am and 5-6pm. No survey data has been supplied to evidence that these are the peak hours on the local highway network.

The data indicates that there would be 74 two-way trips in the AM peak and 99 two-way trips in the PM peak for the PFS. The peak time listed within the TRICS data was 1-2pm.

HDM notes that TRICS data has been gleaned for the proposed drive-thru for weekdays which indicates there would be 42 two-way trips during the AM peak and 66 two-way trips in the PM peak. The peak time listed within the TRICS data was 6-7pm.

The TRICS Consortium Limited released a report in January 2023 named 'Fast Food Drive-Through Trip Generation Analysis 2023' which indicated that peak times of use are Saturday lunchtime and also indicated that more recent surveys show increases in the number of visitors to these type of facilities; which does not appear to have been considered or addressed at the site.

A TRICS search was also conducted for EV charging stations, however there are only a small number of surveys on the system and therefore the data from 5 surveys may not be representative. The data provided indicated that there are likely to be 4 two-way trips in the AM peak and 4 two-way trips in the PM peak. The peak time listed within the TRICS data was 2-3pm.

The methodology detailed within the TS states that developments of this nature are located as such to draw on traffic already routing along the local highway network rather than generating new or primary trips. The TS states there is the potential for some linked trips at the site and suggests that 10% of the trips are likely to be linked with 20% of trips classified as new. No evidence or research has been provided to justify these figures and the applicant appears to try to justify there is limited uplift by focussing solely on the 'new' trips. A robust assessment would consider the trip generation relating to the new drive thru use in full rather than just a percentage of the trips, as even pass-by trips would still be new turning trips at the site accesses.

Whilst HDM accepts there may be linked trips at the site, it is likely that there will be a considerable number of pass-by or diverted trips to the site which are not mentioned within the TS.

The TS refers to the proposed access / egress arrangements as a 'betterment' by providing a one-way system through the site. It is HDM's view that the proposals will increase the level of trips to the site and enforce a one-way arrangement where all vehicles have to pass through the PFS pumps which is likely to increase queuing and congestion through the site and could potentially lead to blocking back onto the public highway onto Bradford Road.

Further information was requested in relation to the proposed use of the drive thru including the number of covers and the likely floorspace within the building that is publicly available floorspace / the number of covers proposed. The applicant has not provided any additional information in this regard.

It is noted that the submission states there will be 3 full time staff and 8 part time staff at the site, a full time equivalent of 7 staff.

Further information was requested in relation to the use of the EV charging bays and the likely level of use of these bays, the type of charging facility proposed and likely dwell time of drivers at the spaces. No further information has been supplied.

Vehicular Access:

There are currently two vehicular access points at the site accessed from Bradford Road, the existing site layout plan indicates that these are an 'in' (northern access) and an 'out' (southern access) although HDM is of the view that vehicles exiting the B & D Bolts site are more likely to exit from the northern access closest to their building rather than pass through the pumps at the Petrol Filling Station and furthermore there are right turn markings located on Bradford Road adjacent to both site access points.

The proposed site layout plan appears to show no change to the southern 'out' access but shows a new kerbline to be constructed within the existing northerly 'in' access to allow for hardstanding to accommodate an LV cabinet and EV charging bays. Should this amendment be approved by the LPA, it

would require an amendment to the dropped kerb which would need to be delivered via a Section 278 agreement or another appropriate agreement that is agreed with the Highway Authority.

HDM previously requested swept paths to be provided for the site. Dynamic Transport Planning have provided swept paths for the largest vehicles they deem will service or access the facilities. They have detailed a large car accessing / egressing part of the drive thru lane, but do not show vehicles negotiating the tight alignment on the approach and exit from the drive thru lane; which is required. Furthermore, large vans are likely to use the drive thru and therefore larger vehicles should have been shown accessing the full route into and out of the site and the drive thru lane also.

The swept paths provided also show the oil tanker servicing the site using the relocated offsets fills which have been relocated to in-between the pumps. The vehicles accessing via the western access on Bradford Road appear to track exceptionally close to the proposed kerblines and may cause damage on part of the public highway. 0.5m clearance to kerbing or vertical obstructions on each side of the swept path should be provided. Designs should therefore, where possible, aim to cater for vehicles larger than the above minimum standards.

A swept path has been provided for a 10m rigid which appears to service the drive thru unit, but it accesses by driving towards the pumps and reversing back towards the accessible bay, which could cause conflicts within the site as this occurs in close proximity to the pedestrian path indicated within the site, furthermore the vehicle would block egress from the drive thru lane and impede vehicles intending to access the drive thru lane, plus it may impede vehicles intending to exit parking spaces 1-7 plus several of the EV charging bays. To exit the site the vehicle would need to exit through the pumps and would require the central four pumps to be clear of vehicles to have adequate space to exit. HDM is concerned that this could cause queuing and obstruction within the site which could cause queuing back onto the public highway.

No detail has been provided as to whether the PFS / Drive thru would be closed to the public during servicing or what arrangements would be put into place to ensure the safe operation of the site. A servicing management strategy should have been considered and detailed.

HDM is concerned that the intensification of use of the access, the servicing manoeuvres in close proximity to the site access and the provision of EV charging spaces adjacent to the access could cause blocking back onto the public highway to the detriment of highway and pedestrian safety.

It is noted that an RSA brief has been submitted by Dynamic Transport Planning, however, at this stage HDM cannot support the arrangements due to the potential for queuing and obstruction at the access to the site and the issue with the oil tanker swept path detailed above.

Visibility splays from the proposed site accesses were previously requested to comply with a 30mph speed limit, 2.4m x 43m to the nearside kerblines. Visibility splays have not been demonstrated.

Despite the proposed plan stating 'existing crossing in' for the northern access and 'existing crossing out' on the southern access, HDM believes those exiting the drive thru lane and those using the EV spaces may not drive across the Petrol Filling Station frontage to exit the site and therefore there could be conflicts at the site access that compromise highway safety. Further consideration is needed in relation to access and egress arrangements and the implications of using the PFS forecourt to exit from the site.

Furthermore, no details have been provided in relation to the existing servicing of the site and the proposed servicing arrangements for the site. The number of vehicles and times of service vehicles should be outlined. Further information and swept paths should have been provided to detail the existing and proposed arrangements for all uses provided on the site.

The proposals appear to remove access to the neighbouring property to the rear where there is an existing gate, in the proposed arrangement landscaping is shown in-front of the existing gate but no access is provided from the drive thru loop. The applicant should review and clarify rights of access from the neighbouring property, provide appropriate access if necessary and detail this.

Pedestrian Access:

HDM notes there are no clearly defined pedestrian access route to the existing uses on the site. However, it is HDM's view that the proposals are likely to intensify the use of the site for vehicles and pedestrians and as such dedicated pedestrian routes should be provided to enable safe access and egress by visitors and staff. Whilst an indicative path is shown from Bradford Road it is not clearly defined that this is a pedestrian access route to raise awareness of potential conflicts. It is HDM's view that the proposals should provide a 2m wide footpath for pedestrians and the proposals should tie into the existing public highway arrangements within the vicinity of the site on Bradford Road.

Three Sheffield stands have been relocated within the site adjacent to some bollards and appear to narrow the pedestrian access path to the drive-thru to less than 800mm width which is not accessible; it is also unclear if there is a dropped kerb present. It is also noted that this path runs adjacent to the relocated parcel lockers and therefore the full width of footway provided at that point could be restricted. A zebra crossing marking is located between an area of hardstanding that runs alongside parking space no 5, this hardstanding is less than 1.6m depth. While it appears that dropped kerbs are proposed at either side of the zebra crossing marking, the kerbline is exceptionally curved to the north which does not appear to provide priority for pedestrians. Whilst the footway that extends further to the north is in excess of 2m width it narrows to less than 0.7m between the bollards and the entrance door to the proposed drive thru / A3 unit which is not acceptable.

A pedestrian path is now shown running along the eastern edge of the EV bays and a zebra crossing marking which links across to a pedestrian path that runs behind parking spaces 1-4 which is approximately 1.2m wide. Whilst this is an improvement on the previous design, it is not clear if the route is accessible due to the presence of bollards and kerbed islands and the issue raised above in regards to the narrow footway width at the entrance door would be an issue for this route too.

Internal Layout:

The proposed building is located centrally within the space to the rear of the site with a vehicle loop around it and proposes car parking directly in-front of the unit, adjacent to the 'out' point of the drive thru and adjacent to the 'in' point of the drive thru. No details are shown of the order point/s.

HDM is concerned that this arrangement appears very tight for vehicles manoeuvring in and out of the site due to the presence of the EV charging spaces and proposed car parking spaces within the site, the swept path proposed only shows vehicles on the loop itself not accessing and egressing the drive thru lanes.

The arrangements appear cramped and HDM is concerned the proposed arrangements would increase conflicts within the site due to the level of parking spaces proposed and the close proximity to other uses such as the drive thru, the vacuum bay / jet wash and the access / egress arrangements.

HDM is also concerned that there is limited visibility for those exiting the drive thru lane due to the presence of car parking spaces 5-7.

Whilst HDM notes that the jet wash bay is proposed to remain in its existing location, the proposed increase of vehicles passing through the PFS pumps to exit the site could cause more conflicts. There is limited visibility at this point due to the existing building line. Furthermore, the relocated vacuum bay and

parking spaces adjacent to the access will result in more vehicles manoeuvring within close proximity of the exit which will cause further conflicts within the site.

The provision of parking bays 8 and 9 along the Bradford Road frontage removes the ability for vehicles to exit the site unless two fill pumps in a row have no vehicles parked at them.

Parking:

The submission includes approximately 11 car parking spaces incorporating 1 accessible parking spaces and 6 Electric Vehicle Charging Spaces. Kirklees Council's Highway Design Guide does not have specific car parking standards for retail uses or drive thru uses and therefore evidence was requested to demonstrate that the proposed parking is appropriate for the development.

The submitted TS makes reference to the parking standards within the Unitary Development Plan, and states that 8 car parking spaces should be provided for the retail use and 25 for the food and drink unit; a total of 33 spaces overall. However, this document has since been superseded.

The submitted TS states that there are 25 operational parking spaces proposed as part of the development which broadly aligns with the local standard requirements. HDM would contest this, as 6 of the spaces are for EV charging and 8 of the spaces are located at fuel pumps and therefore would be unlikely to be available for users visiting to use the drive-thru unit or for non fuel retail purchases. 11 general purpose car parking spaces are proposed according to the submitted site layout plan.

No parking surveys have been undertaken either at the site or at a similar site in a comparable location. The TS supplies parking accumulation data but it is unclear where this data has been derived from, the raw TRICS data in the appendices appears to be based on 'drive through' operations and yet the explanation given in 5.3.4 of the TS appears to state that the data is for a 'fast food' use without a drive thru.

No details have been provided in relation to the parking demands for the existing uses on the site. Survey data should have been provided to ascertain that the proposed level of car parking is adequate for the uses proposed to operate on the site and will not result in further congestion or obstructive parking within the site.

Furthermore, there are a number of cumulative uses proposed for the site and therefore a robust and realistic assessment of parking demands for all uses has not been undertaken.

Standard parking spaces provided in a perpendicular arrangement should be 2.5m wide x 5m length and provided with 6m aisle widths. Accessible spaces should be provided with an addition 1.2m aisle to one side and to the rear of the space.

Kirklees Council's Highway Design Guide does not have specific cycle parking standards for retail and food / drink uses, however, The Department For Transport Local Transport Note 1/20 provides notional standards on Page 134 of the document, setting out both long stay and short stay standards and also provides guidance on the design of facilities. All cycle parking should be located at ground floor level, long stay for staff should be provided in a secure covered arrangement and short stay visitor facilities should be located in a well overlooked location with natural surveillance close to the proposed destinations. Whilst the cycle parking proposed is now located closer to the PFS and the proposed drive-thru building, it restricts the available footway width. It does not appear to be located in a well overlooked location and does not appear adequate in number of spaces or type of provision for staff.

Waste Management:

It is anticipated that the refuse & recycling arrangements are likely to be undertaken by a private organisation, but further clarification should have been supplied. The bin storage appears to be located at the side elevation of the existing retail unit but it is not clear if there is sufficient space provided for the existing use and no details are provided for the storage of refuse of the proposed drive thru which could impede access routes or parking spaces within the site as a result. Furthermore, the location of the parcel lockers could impede access to the refuse store.

The Kirklees Waste Management Design Guide For New Developments provides additional information in relation to waste management within Kirklees.

Public Transport:

The site is less than 300m distance from Batley Bus Station and there is a bus stop opposite the site. There are approximately 1-4 bus services per hour along Bradford Road.

Conclusion:

HDM considers that whilst additional information has been provided it is not sufficient to overcome highways concerns in relation to the proposals. See recommendation above.