

**From:**  
**Sent:** 14 April 2026 22:16  
**To:** DC Admin; Kerri Simpson  
**Subject:** 2026/90783 - Formal Objection – Proposed Petrol Filling Station, A642 Wakefield Road (Highway Safety and Policy Compliance)

I write in a professional capacity to submit a formal objection to the proposed petrol filling station on land adjacent to the A642 Wakefield Road.

This objection is made on the basis that the development would result in unacceptable impacts on highway safety, in clear conflict with national, local, and regional planning policy.

### 1. Existing Highway Safety Context

The application site is located on a section of the A642 Wakefield Road that has experienced approximately 75 recorded casualties within the most recent five-year period. This level of incident frequency is materially significant and indicates the presence of an established collision cluster and/or inherent deficiencies in the local highway environment.

In transport planning terms, this baseline condition is a critical material consideration. The existing safety record demonstrates that the network is already operating under stress, with a heightened sensitivity to additional vehicular conflict.

### 2. Local Highway Characteristics and Constraints

The safety concerns are materially exacerbated by the prevailing highway conditions at this location. The A642 operates at a 50mph speed limit on the approach to a roundabout in the vicinity of the proposed development. This is a key constraint that significantly influences driver behaviour and collision risk.

Vehicles travelling at this speed are required to decelerate as they approach the roundabout, creating a dynamic environment characterised by:

- Rapid changes in speed and driver decision-making
- Increased braking distances and reduced reaction time
- Heightened sensitivity to unexpected manoeuvres

The introduction of a petrol filling station access within this context would result in vehicles:

- Pulling out into traffic travelling at or near 50mph
- Attempting to join or cross a live traffic stream immediately prior to a junction where drivers are already adjusting speed and lane position
- Creating additional and competing decision points for drivers approaching the roundabout

This combination materially increases the likelihood of rear-end shunt collisions, side-impact collisions, and conflict arising from sudden braking or evasive manoeuvres.

### 3. Technical Standards – Stopping Sight Distance and DMRB Compliance

In accordance with the Design Manual for Roads and Bridges (DMRB), access design on high-speed roads must ensure that appropriate Stopping Sight Distance (SSD) is achieved, reflecting vehicle speeds and driver perception–reaction time.

For a 50mph road, DMRB guidance (e.g. CD 109) requires visibility splays and forward visibility that allow drivers sufficient distance to perceive a hazard, react, and come to a controlled stop. On an approach to a roundabout—where drivers are already decelerating and scanning for circulating traffic—the effective availability of SSD is often reduced due to:

- Vertical and horizontal alignment constraints
- Queuing and vehicle stacking associated with the junction
- Driver focus being directed toward the roundabout rather than a new access point

The introduction of a new access in such a location risks substandard or compromised SSD in practice, even where theoretical visibility splays may be demonstrated. This creates a situation where drivers may be unable to respond safely to vehicles entering or exiting the site, particularly under peak or congested conditions.

As such, the proposal raises serious concerns regarding compliance with DMRB principles and the ability to achieve a genuinely safe access arrangement in operational terms.

#### 4. Nature of the Proposed Use

A petrol filling station is a high-turnover roadside use, characterised by:

- Frequent vehicular ingress and egress
- Short dwell times and unpredictable driver behaviour
- A high proportion of turning movements, including right-turns across live traffic
- Conflict between slowing, stationary, and accelerating vehicles

When combined with a 50mph approach to a roundabout, these characteristics create a compound risk environment that is fundamentally incompatible with safe highway operation.

#### 5. Policy Conflict – National Planning Policy Framework

The proposal fails to accord with the National Planning Policy Framework (NPPF), specifically:

- Paragraph 114, which requires refusal where development would result in an unacceptable impact on highway safety or where the residual cumulative impacts are severe.

Given the existing casualty record, speed environment, and junction proximity, the development would give rise to a severe residual cumulative impact on highway safety.

- Paragraph 115, requiring safe and suitable access for all users.

This has not been robustly demonstrated.

#### 6. Policy Conflict – Wakefield Local Plan

The development conflicts with the Wakefield Local Plan, including:

- Policy SP5 (Transport Infrastructure)
- Policy T1 (Transport and Accessibility)
- Policy T2 (Highways Safety)

These policies require that development does not compromise highway safety, which this proposal clearly would.

#### 7. Conflict with Regional Transport Strategy

The proposal is inconsistent with the objectives of the West Yorkshire Combined Authority, including the West Yorkshire Transport Strategy 2040 and its Vision Zero ambition.

#### 8. Conclusion

In summary, the proposed development:

- Would result in a severe residual cumulative impact on highway safety, contrary to the NPPF (paragraphs 114–115)
- Fails to comply with Wakefield Local Plan Policies SP5, T1, and T2
- Conflicts with the objectives of the West Yorkshire Combined Authority
- Raises serious concerns regarding DMRB compliance and stopping sight distance
- Introduces unsafe access within a 50mph approach to a roundabout
- Would exacerbate a location with a significant and evidenced casualty record

On this basis, there is a clear and defensible justification for refusal.

(14/4/26 i regret to inform you of a RTA on the A642 close to the roundabout which resulted in the police and ambulances attending.)

Kind regards