Consultation Response from KC, Highways Development Management
2026/90783 7, Wakefield Road, Grange Moor, Huddersfield, WF4 4DS
Erection of extension and refurbishments to former petrol filling station/car sales to form petrol filling station with retail, office, hot food take-away, car sales and repair facilities with canopy, car wash area, PF pumps, parking and storage tanks
Date Responded: 29/10/2026 Responding Officer: CNB Responding Ref: K16-1/2

This application is for the erection of extensions and refurbishment of a former petrol filling station to form a petrol filling station with retail, office, hot food take away car sales and repair and car wash at a site fronting on to A642 Wakefield Road, a 50mph two-way single carriageway main distributor road of approximately 9.3m width with a hatched central reserve with right turn lanes to both sides and pedestrian refuge islands. There is a footway on the side of the site with a grass verge opposite that turns to a footway to the east of the site and street lighting present.

There are bus stops on a medium frequency (1 bus per hour per direction) route within 175m of the site.

There are proposals to reduce the speed limit on Wakefield Road from 50mph to 40mph from a point to the west of the proposal site to the opposite side of the roundabout junction with A637 Barnsley Road and also proposals to implement highway safety and active travel improvements to the A642/A637 roundabout as part of previous permission 23/90668, although these have yet to be implemented.

The applicant submitted a Transport Statement Document 001, issue number 01 dated Feb 2026 from Sanderson Associates. This assessment is based on details provided within the TS and submitted layout drawings.

The site benefits from a conditional permission for extensions to form a car sales and repair facility as 23/92129, this permission doesn't appear to have been undertaken.

Collision Data
A collisions survey was carried out within the TS and this suggested that the section of Wakefield Road to the frontage of the site has only experienced one recorded PIC in the last 5 years, with other collisions recorded at the roundabout junction with A637 Barnsley Road to the east and the junction of Paul Lane to the west. This would obviously have been during a time that the site was either closed or during its time as a car salesroom, which would have generated fewer trips than the current proposals. We extended a collisions search to cover the last 20 years as this would have included the use of the site as a petrol filling station (PfS) and this indicated that the number of PICs recorded at the access to the site were similar to the last 5 years submitted with the current application and so we must assume that when last used as a petrol filling station the access operated safely, although we do accept that the current proposals do have the propensity to increase trips to the site over and above the trips expected for the previous PfS use.

Access
The access into the site is existing and is currently set up as a one-way circulatory system with the eastern access marked as the entrance and the western access marked as the exit, with right turn lane markings into the eastern access. It is noted that on drawing No 2797 (100) 06 Site Plan as Proposed, indicates that the one-way system is to be reversed, and this would not be suitable without changes to the markings on Wakefield Road to increase the length of the right turn lane at the proposed western access. It is also noted that on drawings Nos 401101-001 Site Access Visibility Splays and 401101-002 Swept Path Analysis of Proposed Arrangements the western access is shown as an entrance while the eastern access is marked to allow two-way movements (in and out). The proposed layout of the access should be confirmed before we can make a decision on the suitability of the access to the site.

We do not consider that the existing right turn lane for the western access is acceptable, and a suitable length right turn lane couldn't be formed without having an adverse impact on the right turn lane into the commercial premises opposite, the right turn lane would need to be 40m to meet current guidance.

We would prefer the in and out access points to remain as they are with the entrance to the east and the exit to the west. However, any proposed changes to the access would require approval by the Kirklees Highway Safety and s278 teams, an independent stage 1 Road Safety Audit and re-marking works would need to be carried out under the correct legal agreement with the Local Highway Authority.

A speed survey was carried out on Wakefield Road and this recorded 85th percentile speeds of 44.71mph heading eastbound, the critical direction. This would require a visibility splay of 123m based on DMRB calculations. Drawing No 401101-001 Site Access Visibility Splays shows that this visibility splay can be achieved to the right and that there is a full-length visibility sightline between the access and the exit from the roundabout junction to the east. These are acceptable. It should be noted that paragraph 4.6.4 indicates that the visibility splay construction is based on Manual for Streets paragraph 10.5.3 although the visibility splay Y-distances have been calculated from DMRB guidance and so DMRB guidance should have been used for the construction of the splays, however, there appears to be suitable visibility at the site to conform to DMRB standards and so this isn't a concern.

Trip Generation
The proposals are for a six-pump filling station with an automated car wash, a convenience store, hot food takeaway, office accommodation to the first floor and car sales/repair, all of which are expected to employ approximately 18 full-time equivalent staff. There will be 12 car parking spaces (including 2 accessible spaces), charging spaces for 2 EVs and 4 cycle parking spaces.

Trip generation for the different uses at the site was provided within the TS and were based upon data obtained from the National TRICS database. This indicates that a total of approximately 94 two-way trips would be generated in the AM peak, 123 two-way trips in the PM peak and 137 trips on a Saturday noon retail peak. Some of these trips may be linked trips and the TS suggests a figure of 20% of linked trips between the PfS/retail and the hot food takeaway. The TS also suggested that there would be a split in trip types at 20% new trips and 80% pass-by and diverted trips, while HDM considers that 20% new trips for retail/PfS may be a bit high given the location of the site on a primary A-road, we are happy to accept the figures as proposed.

Given the trip generation and trip type discounting indicated above, we would not expect the proposals would have a severe impact on the operation or efficiency of the local highway network.

Internal Layout
Drawing No 401101-002 shows a swept path analysis showing access for cars and an oil tanker, although the drawing shows both entrance and exit from the eastern access, again this will need confirming and a new swept path analysis produced that also shows vehicles exiting the site and heading westwards along the A642.

Drawing No 401101-001 Site Access Visibility Splays and drawing No 401101-002 Swept Path Analysis of Proposed Arrangements shows the car wash as having an entrance to the south and an exit to the north, however no swept path analysis has been provided to show that a car exiting the car wash can turn safely within the car park while cars are parked in spaces 6 to 12. A swept path analysis would be required to show that safe access and egress of the car wash can be achieved.

Parking
A greater concern is the level of parking demand proposed by the development in relation to the proposed provision of parking spaces. Due to the layout and nature of the A642 fronting the

development site we would not wish to see any development in this location that generates a demand for on-street parking and would need to see that all parking demand generated by the development can be successfully accommodated on site for highway safety reasons.

A parking accumulation analysis was provided with the TS (Table 2) and this appears to indicate the maximum parking demand for the hot food takeaway would be 3 spaces, this, however, may be flawed as this doesn't actually give an indication of parking demand and also the figures were based on one-hour intervals and the dwell time for a takeaway would be expected to be below 1 hour. A more realistic result may have been obtained from using smaller time periods of either 30 or, better still, 15 minutes, although it is accepted that this level of detail is often missing from TRICs data. The table shows 12 arrivals at the noon peak hour with 11 departures, and it would be expected that this would generate a parking demand closer to the UDP figure than the 1 space that the table indicates for this hour. This may indicate that there is a shortfall of parking provision for the hot food take-away aspect of the site. The numbers of staff should be indicated along with identified staff parking on the layout drawing. No details were provided relating to the type of hot food takeaway to be included and we appreciate that different takeaway styles will generate different demand.

The petrol filling station would not be expected to generate any additional parking beyond the cars parked at the pumps whilst filling and paying, apart from staff parking. There may be some linked trips between pump use and convenience store use, but these types of trips are usually accommodated with parking at the pump and shouldn't be a concern.

It would be expected that the convenience store attached to the Petrol Filling Station will generate some trips independent from fuel purchases. It is accepted that the trip rates for the PfS included sites with a shop attached and will include these trips, however there may be an additional parking demand generated by the shop that would not be accommodated by parking at the pumps. RAC Foundation research suggests that, in some non-urban areas, up to 80% of trips to a PfS with retail go for the retail alone and so, even though we do not think the additional parking demand will be the full 80% of the trips generated by the PfS, there would be some parking demand generated.

The trip generation details for the proposed office space identifies 3 arrivals and 3 departures during the peak hours. A re-run of the TRICs data for offices confirms this and indicates that the parking accumulation demand would be for 4 spaces, however it should be noted that this demand may vary with the final user of the offices and the number of customers expected to visit the site during the operation of the office.

Staffing for the above uses is given as; PfS/store – 3 staff, takeaway – 3 staff, office – 3 staff. Although there would be a level of car sharing and use of sustainable travel modes, due to the unsustainable location of the site we would still expect most of the staff to travel by private car and this may use up to 9 of the 12 car parking spaces on site. We would like to see the staff parking marked clearly on a drawing to ensure there is sufficient supply provided so as not to remove excessive amounts of the customer parking.

The "Site Plan as Proposed" drawing No (100) 06 indicates 12 car parking spaces (including two accessible spaces and two EV charging spaces) to serve the above uses and we feel that this will be insufficient for the demand at the peak times. The site is not suitable for on-street parking on A642 and any requirement for on-street parking in this location would be a highway safety concern.

No details were provided for the layout or parking for the car sales/servicing aspect of the proposal (this is included as phase 2, although there is nothing to indicate that the current application is only for phase 1). We would need to see a proposed layout for this area, indicating the locations of car sales parking, customer parking and staff parking.

Servicing and Deliveries
A swept path analysis for a delivery tanker was provided as part of drawing No 401101-002 Swept Path Analysis of Proposed Arrangements, however this shows the delivery tanker accessing the site through the western access and this would require it to cut across the opposing right turn lane in order to make the manoeuvre. Again, we would need to see confirmation of the entry/ exit layout of the site and would prefer the entry to the east access and exit from the west access so that the correct length of right turning lane can be utilised. We would need to see either confirmation of a change in access arrangements and the proposed changes to the layout of the highway markings to achieve a safe access or the swept path showing the tanker accessing through the eastern access and egressing through the western access.

We would also need to see further details of the car sales aspect of the proposals including access by car transporter vehicles if these are to be used for deliveries of vehicles.

Waste storage and collection details would need to be provided, including a swept path analysis for a refuse collection vehicle (11.85m Kirklees vehicle is preferred for this). It would be expected that waste collection would be done by Kirklees Commercial waste or by a private commercial waste collection company.

Conclusion
With this we cannot fully assess the impacts of the proposals on highway safety and would need the information requested above in order to do this and so we cannot currently support the application as submitted.