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| <b>Consultation Response from KC,<br/>Highways Development Management</b>                                                |
| <b>2026/91972 Silent Woman Hotel, Nabbs Lane, Slaithwaite, Huddersfield, HD7 5AU</b>                                     |
| <b>Change of use from public house (Sui Generis) to children's day nursery (Class E(f)) (within a Conservation Area)</b> |
| <b>Date Responded: 18/09/2026<br/>Responding Officer: CNB<br/>Responding Ref: K1-33/17</b>                               |

This application is for the change of use of a public house to a children's day nursery at a building fronting on to Nabbs Lane, a 30mph two-way single carriageway local access road of approximately 7.8m width with a single footway on the side of the proposal site and street lighting present. There are No Waiting At Any Time (NWAAT) TRO markings on both sides to the east of the site with no loading flashes opposite and along Church Lane. The NWAAT TRO markings to the front of the land adjacent to the application site have been obscured due to re-surfacing/wear and have attracted on-street parking along this section in contravention of the TRO. There is a length of approximately 18m along the frontage of the site that currently doesn't have any parking controls.

It is approximately 220m to stops on a high frequency bus route and approximately 400m to the rail station in Slaithwaite.

The closest convenience store is approximately 250m from the site with a supermarket within 300m and other shops and facilities in Slaithwaite town centre within 350m.

The site is on the route between the town centre and a primary school (Slaithwaite CE Junior and Infant School) and as such we would expect there to be a higher than usual level of traffic using the road at the peak school hours. Also the single footway outside the site is expected to be a pedestrian rout to the school, and as Nabbs Lane only has a footway on the side of the proposal site we would not wish to see any development that may obstruct or block this footway for highway safety reasons.

Due to the proximity of the station and the low supply of public car parking within Slaithwaite, this area attracts a high volume of commuter parking that leads to an oversubscription of the available parking spaces. This has led to highway safety issues due to obstruction and resulted in the parking TROs being upgraded in parts of this area to include No Loading, especially along one side of Church Lane. Consultation with the Kirklees Highway Safety team indicated that they are currently investigating the possibility of introducing a "resident only" parking scheme along Nabbs Lane and Howgate Road due to complaints by local residents. It should be noted that as a commercial business the proposal site would not be eligible for parking permits.

The application was accompanied by a Transport Statement.

#### Trip Rates

No trip rates for the proposals were provided within the Transport Statement, either using TRICS data, a count at a similar local facility or from first principles. The Transport Statement merely suggested that the trips generated by the proposals were "not expected to increase overall traffic generation" from the use as a pub. This is to simplify the issue and doesn't take in to account the times that trips would be focused in to, which in the case of a children's nursery is likely to be the existing highway peak hours. A pub would be expected to generate the majority of its trips outside the network peak hours. The number of proposed children were not included in the Transport Statement and was obtained from the

An interrogation of TRICS data indicates a trip rate of ;

| Trip rate/child (based on sites with 25 to 100 children) | Trips (based on 50 children) |            |
|----------------------------------------------------------|------------------------------|------------|
|                                                          | Arrivals                     | Departures |
| AM Peak                                                  | 0.172                        | 0.143      |
| PM Peak                                                  | 0.094                        | 0.125      |

| Trip rate per 100sqm (based on all sites) |          |            | Trips (based on measured area of 377sqm) |            |
|-------------------------------------------|----------|------------|------------------------------------------|------------|
|                                           | Arrivals | Departures | Arrivals                                 | Departures |
| AM Peak                                   | 3.933    | 3.110      | 15                                       | 12         |
| PM Peak                                   | 2.717    | 3.264      | 10                                       | 12         |

This indicates that trips to the site would be somewhere between 9 and 15 in the morning and 15 and 12 in the afternoon. These trips would not be expected to have a severe impact on the operation or efficiency of the local highway network. However, the issues are not the number of vehicles on the network, it's the limited opportunities for parking and drop-off at the site.

It should be noted that not all the sites surveyed would be similar to the proposal site (as often occurs with the use of TRICS data) and so a survey of another similarly sized local nursery would have provided more accurate trip rate and parking demand data.

The proposals are for 2 off-street parking spaces, and these would be for staff. The current regulations suggest a ratio of staff to children of 1:8 and so for 50 children this would require 7 staff, although no staffing numbers were included in the Transport Statement. This would require 5 staff to have to either park away from the site or make alternate travel arrangements. This would be an acceptable arrangement with a strong staff travel plan included as condition.

#### Highway Safety Concerns

The main concern is the drop-off and pick up of children at the site, as there is no off-street parking for drop-off and pick-up within the application site and it is very constrained for on-street parking with existing TROs restricting spaces, the proposed Resident Parking scheme possibly removing others and the remaining available on-street parking being subject to competing uses, including commuter parking which is prevalent in the area due to the proximity of the railway station.

The Transport Statement indicates in Section 7 Parking and Drop-Off that "parents will utilise the on-road parking for short duration drop-off and collection" and this area is then indicated on a photo of the site. However, this land is part of the adopted highway and could not be reserved exclusively for the use of the nursery and would be subject to the competing demand, and evidence shown in Google Streetview, indicates that this length of highway is frequently used for parking. The applicant provided photos showing the space not being used during the AM peak, however this was just a single snapshot when scaffolding and barriers were installed at the premises, and this may have been a factor in drivers deciding against parking there while renovation works were ongoing. The applicant has provided no other parking surveys of the local area to indicate that spaces would be available for drop off and collection.

Based on the TRICS data there would be a parking demand for 15 spaces in the morning and afternoon peaks with a slightly smaller demand during the adjacent hours. Given the extended times required for drop-off and pick-up of nursery age children, it wouldn't be unreasonable to approximate this to 10 minutes per vehicle. With an extreme worst-case scenario of 50 children being independently dropped off, and a maximum available frontage of 18m which would be suitable for 3 cars, and assuming there was no competing use of the parking spaces, this would take approximately 2.7 hours of continuous use, with the drop-off timings carefully controlled. Obviously, this is an extreme case, and not all the children would be independently dropped off. Based on the TRICS data of 15 arrivals, this could be achieved within the peak hour. However, as the spaces to the front of the site cannot be guaranteed to be free as the road is open to all users and all competing parking demand, then this may not be

achievable.

The Transport statement also mentions that there is a public car park on Old Bank within 50 yards of the site, however there was no indication of existing use of the car park or if spaces would be available at the drop-off and pick-up times, and given that parking is oversubscribed in Slaithwaite, the car park is still in the proximity of the town centre and the railway station and would attract commuter parking, and the photo evidence from street view that shows the car park near capacity (or above given the location of some of the parked vehicles on the access to the canal bridge), we doubt that spaces would be available. No car parking surveys were provided within the Transport Statement to refute this.

If the nursery were to try and “reserve” the drop-off spaces to the front of the site, without the necessary licences from the Local Highway Authority, then this may be viewed as an offence under the Highways Act and the applicant may be liable to prosecution.

With this, it is likely that during drop-off and, to a lesser extent pick up due to the slightly longer stay times for collecting children, the drivers may be forced to “double park” on Nabbs Lane, park in unsociable locations causing obstructions to driveways etc, or park in contravention of the TROs, and these would be a highway safety concern.

The Kirklees Highways safety Team have been consulted and have commented that they “fully support encouraging sustainable travel and reducing reliance on on-site parking. However, in this case, it is difficult to identify a suitable safe alternative location with good pedestrian facilities to and from the building where displaced parking could reasonably be accommodated” and that they “wouldn’t support the proposals without any off-street parking facilities”. They also pointed out that the nursery wouldn’t qualify for residents parking permits and that they would recommend yellow lines immediately outside the property to try to maintain visibility and pedestrian access.

Without a more detailed indication of how the drop-off and pick-up will be managed and how unsociable parking will be avoided, we cannot accept that a safe way of operation can be achieved at this location.

With this we cannot currently support the application as submitted as the applicant has not provided sufficient information and details to indicate that safe and suitable access arrangements can be provided for drop-off and pick-up at the site and so we must object on highway safety grounds.