

# Kirklees Council Highway Design Guide Supplementary Planning Document

## Consultation Statement - October 2019

### 1. Introduction

1.1. This statement of consultation sets out how Kirklees Council has carried out the necessary consultation to inform the preparation of the Highway Design Guide Supplementary Planning Document (SPD). The statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Highway Design Guide Supplementary Planning Document (SPD).

1.2. The Consultation statement provides information on the consultation that was undertaken to develop the SPD. In particular, this statement sets out:

- The Purpose of the consultation
- Who was consulted
- How they were consulted
- A summary of the main issues raised during the consultation
- How those issues have been taken into account in the adopted SPD

### 2. Statement of Community Involvement (SCI)

2.1. The National Planning Policy Framework states that planning policy should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.

2.2. These principles are defined within the Council's SCI which was adopted in September 2015. It outlines how the Council will work with local communities and stakeholders in developing planning policy documents, including SPDs. Consultation on the Highway Design Guide SPD has been prepared in line with the principles of the adopted SCI.

### 3. Timetable of SPD production

The Production of the Highway Design Guide SPD has followed a number of stages. The timetable for the production of the SPD is set out below.

Dates	Stage or Consultation Topic/Event
May 2017 – August 2017	Evidence Gathering and Early Internal Stakeholder Engagement
June 2017	Strategic Environmental Assessment Screening and Consultation
September 2018 – October 2018	Draft Highway Design Guide SPD presentations

1 <sup>st</sup> November 2018 – 13 <sup>th</sup> December 2018	Public Consultation on the Draft Highway Design Guide SPD
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#### **4. Consultation on the preparation of the draft Highway Design Guide SPD**

4.1. Early consultation on the preparation of the Highway Design Guide SPD was undertaken with internal council specialisms. This period of internal officer engagement was held from 9<sup>th</sup> May 2017 until 30<sup>th</sup> August 2017.

4.2. The following Internal council specialisms were consulted as part of the preparation and initial drafting of the SPD:

- Lighting
- Rights of Way
- Highways
- Road Safety
- Creative economy
- Green Infrastructure
- Landscapes
- Structures
- Waste & Street Cleansing
- Health
- Section 38
- Drainage

4.3. During the consultation period 13 internal responses were received regarding the preparation of the SPD.

4.4. All the main issues and themes raised as part of the consultation formed the basis for the development of the draft Highway Design Guide SPD for the public consultation and have been incorporated in to the SPD.

#### **5. Consultation on Strategic Environmental Assessment Screening**

5.1. As part of the process for developing the Highway Design Guide SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) was needed. Consultation on the SEA screening statement started on Friday 2<sup>nd</sup> June 2017 and finished on Friday 30<sup>th</sup> June 2017.

5.2. The council notified the following specified bodies of the SEA screening statement by email inviting comments in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004:

- Environment Agency

- Historic England
- Natural England

5.3. Responses were received from all three of the consulted bodies. A full summary of the responses received for the SEA consultation can be seen in the SEA determination Statement.

5.4. The responses received confirmed the council's position that a further SEA was not required as the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been covered in principle in the Sustainability Appraisal of the Local Plan.

## **6. Pre-consultation presentations on Draft Highways Design Guide SPD**

6.1. Presentations on the draft Highway Design Guide SPD were held between 20<sup>th</sup> September 2018 and 4<sup>th</sup> October 2018 for planning committees. The purpose of the presentations was to set out how and why the Highway Design Guide SPD had been produced and how it will support the planning process. In addition the presentations gave the opportunity for questions and discussion on the draft Highway Design Guide SPD.

6.2. Presentations were made to the following planning committees:

- Huddersfield Planning Committee – Thursday 20<sup>th</sup> September 2018
- Strategic Planning Committee – Thursday 27<sup>th</sup> September 2018
- Heavy Woollen Planning Committee – Thursday 4<sup>th</sup> October 2018

6.3. No comments were received from the presentations and the council proposed no changes to the draft Highway Design Guide SPD following the presentations.

## **7. Public consultation on the draft Highways Design Guide SPD**

7.1. Consultation on the draft Highway Design Guide SPD started on Thursday 1<sup>st</sup> November 2018 and finished on Thursday 13<sup>th</sup> December 2018.

7.2. In compliance with regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the following actions were undertaken:

- A hard copy of the draft Highway Design Guide SPD, SEA screening statement and SEA determination statement were made available to view at the council's Huddersfield and Dewsbury customer service centres.
- The draft Highway Design Guide SPD, SEA screening statement and SEA determination statement were published on the council's online consultation portal. Details of the consultation and details of where hard copies of information could be found were published on the council's website.

- Targeted consultation bodies (Appendix 1) were contacted directly by letter or email with details about the consultation, where to view the document and how to comment.
- A press release was released highlighting the consultation process
- A web banner was placed on the council website advertising the consultation.
- A notification email was sent to all councillors detailing the start of the consultation.

## **8. Representation Statement and Summary of the Main Issues Raised by the Representations**

### **Number of Representations Made**

8.1. A total of 46 representations were made on the draft Highway Design Guide SPD by 32 respondents. These are summarised in Table 2, below. Table 3, following, provides a full list of representors.

<b>Table 2: Summary of Comments made, categorised into Consultation Groups</b>	
<b>Comments received from:</b>	<b>Number of Comments received:</b>
Residents / Individuals	28
Developers / Consultants	4
Statutory Consultees / other Organisations	2
Local Planning Authorities / Councils	6
Town / Parish Councils	5
Councillors	1

<b>Table 3: List of those who submitted a representation</b>		
<b>Comment Reference</b>	<b>Name</b>	<b>Organisation</b>
H_SPD1	Respondent 1	Individual
H_SPD2	Respondent 1	Individual
H_SPD3	Respondent 1	Individual
H_SPD4	Respondent 1	Individual
H_SPD5	Respondent 2	Individual
H_SPD6	Respondent 3	Individual
H_SPD7	Respondent 3	Individual
H_SPD8	Respondent 4	City of Wakefield Metropolitan District Council
H_SPD9	Respondent 5	Individual
H_SPD10	Respondent 5	Individual
H_SPD11	Respondent 5	Individual
H_SPD12	Respondent 5	Individual
H_SPD13	Respondent 5	Individual
H_SPD14	Respondent 6	Individual
H_SPD15	Respondent 7	Individual

H_SPD16	Respondent 8	Individual
H_SPD17	Respondent 9	Individual
H_SPD18	Respondent 10	Individual
H_SPD19	Respondent 11	Individual
H_SPD20	Respondent 12	Individual
H_SPD21	Respondent 13	Individual
H_SPD22	Respondent 14	Individual
H_SPD23	Respondent 15	Individual
H_SPD24	Respondent 16	Individual
H_SPD25	Respondent 17	Individual
H_SPD26	Respondent 16	Individual
H_SPD27	Respondent 16	Individual
<b>Table 3: List of those who submitted a representation</b>		
H_SPD29	Respondent 18	Councillor
H_SPD30	Respondent 19	Kirklees Metropolitan Council
H_SPD31	Respondent 19	Kirklees Metropolitan Council
H_SPD32	Respondent 20	Peak District National Park Authority
H_SPD33	Respondent 20	Peak District National Park Authority
H_SPD34	Respondent 21	Sanderson Associates Ltd
H_SPD35	Respondent 22	Individual
H_SPD36	Respondent 23	Morley Town Council
H_SPD37	Respondent 23	Morley Town Council
H_SPD38	Respondent 23	Morley Town Council
H_SPD39	Respondent 24	Via Solutions
H_SPD40	Respondent 25	Sports England
H_SPD41	Respondent 26	Miller Homes
H_SPD42	Respondent 27	Jones Homes (Yorkshire) Limited
H_SPD43	Respondent 28	Kirkburton Parish Council
H_SPD44	Respondent 29	Historic England
H_SPD45	Respondent 30	Individual
H_SPD46	Respondent 31	Mirfield Town Council
H_SPD47	Respondent 32	Kirklees Metropolitan Council

### Summary of Main Issues Raised by Representors and Councils responses

8.2. Table 4, below, summarises the main issues raised in response to the consultation. A full table of comments received and council responses are included in appendix 2, some comments have been summarised for brevity.

Main Issues Raised	Impact on the Highways Design Guide SPD
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The allocation of HS137 (formerly H358) of the Local Plan and the compliance of this with the Highway Design Guide SPD	Not applicable to the Highway Design Guide SPD
The document is too perspective in relation to technical standards and should have more emphasis on guidance	Amended the document change references from 'standards' to 'guidance' and further emphasised guidance of technical standards proposed
There was not enough consultation and not enough advertisement of the consultation was undertaken	Consultation was undertaken in line with both regulations and the councils adopted SCI
Concerns raised around the lack of minimum parking standards	No amendments proposed, guidance set in the SPD is considered appropriate for parking proposals in new developments
The photos used in the document are of poor quality and do not present best practice in some cases	Amended photos to reflect better practice
Some of the links to other documents are out of date and have been superseded	Amended out of date guidance and signposted further guidance documents in the SPD
Concern over the guidance of tree height in relation to street lighting	Amended the guidance to raise the height to the tree canopy to above street lighting
<b>Main Issues Raised</b>	<b>Impact on the Highways Design Guide SPD</b>
Concern that the council is divesting responsibility for general landscape maintenance	Comments are noted by the council but no amendments were made
The Map needs to made clear where the Peak District National Park is	Amended the map to make clear where the Peak District National Park is
There needs to be further consideration of future digital technologies (e.g. Superfast broadband and 5G technology) and how this will be included in the design of Highways	Comments are noted by the council
There needs to be further consideration of active travel and active design between new developments and surrounding built developments	Comments are noted by the council
The threshold of 10 residential Travel Plan is too onerous	Amended the threshold for travel Plans to 50 resident units
Concerns over the safety of shared spaces particularly in relation to blind, partially sighted and disabled people.	Comments are noted by the council. The SPD sets out guidance for shared space in line with government endorsed guidance. Amendments made to text to emphasis design requirements of visual impaired individuals.
Concern that the document does not adequately reflect rural highways and does not	Comments are noted by the council

reflect the different character areas of the borough	
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## Appendix 1

<b>Bordering planning authorities</b>	
Barnsley MC Planning and Transportation Service Bradford MC Department of Transportation, Design and Planning Calderdale Council High Peak Borough Council	Leeds City Council (Planning and Development Services) Peak District National Park Authority City of Wakefield Metropolitan District Council Oldham MDC Strategic Planning and Information
<b>Kirklees and bordering parish and town councils</b>	
Denby Dale Parish Council Dunford Parish Council Gunthwaite and Ingbirchworth Parish Council Holme Valley Parish Council Kirkburton Parish Council	Meltham Town Council Mirfield Town Council Morley Town Council Saddleworth Parish Council
<b>Regional Bodies</b>	
Leeds City Region Local Enterprise Partnership	West Yorkshire Combined Authority
<b>Other specific consultees</b>	
British Telecom Calderdale & Huddersfield NHS Foundation Trust Calderdale & Kirklees Age UK Cycle Kirklees Consultation Group Environment Agency Highways England Historic England Huddersfield Architects Society Huddersfield Clinical Commissioning Group Huddersfield Society for the Blind Kirrheaton Future Kirklees Visual Impairment Network Kirklees Walking	Lepton Vision Locala Mencap in Kirklees Mid Yorkshire Hospitals NHS Trust National Grid Network Rail Newsome Ward Community Forum NHS Property Services Northern Gas Networks NTL Group Ltd South West Yorkshire Foundation Trust Sport England Yorkshire Water
<b>Planning Agents Forum Consultees</b>	
All members of the Planning Agents Forum	

## Appendix 2

Respondent	Organisation	Page/Para /image	comments	KMC response
Respondent 18	N/a		I'm disappointed that we are not going to have minimum parking standards, at least as a starting point. Why just give an indication as to what would be expected - why not raise it to a default standard?	Comments noted. It is considered that the proposed parking 'to be demonstrated on a case by case basis' taking into account such factors as development type, mix and use, accessibility, and local car ownership will encourage developers to understand to operational requirements of the development rather than a prescriptive table
Respondent 1		p. 16, Para. 1.1	Motor vehicles as the lowest priority is a dream that cannot become a reality in this age of employment away from the home base, and schools allowing pupils from outside their immediate catchment area	Comment noted
		P21	Kirklees is too hilly to accommodate cyclists safely	Comment noted
		p. 31, para. 3.31	Highway design is very lacking in Mirfield and this area should be given specific consideration	Comment noted
		p. 44	No properties should need to be equipped with pumps. If new development deems this requirement, then it should be abandoned without further ado.	Comment noted



Respondent 2		p.44	As one of the authors of the CIRIA SuDS manual referred to I was shocked to see this photograph. It is an example of how NOT to design and build SuDS and is frankly grotesque. It has none of the multiple benefit aspects and looks like a canyon. I know there are many much more appropriate and properly designed SuDS in the Area, any one of which could be used instead.	Comment noted
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			Use and alternative and properly designed SuDS photograph	
Respondent 3		P. 2	This is a very encouraging vision that echoes some of the statements that one might hear at a conference for "Healthy Streets".  The pity is that is that it would have been so much better if had been written and approved much earlier. The phrase "The door is being closed after the horse has bolted" comes to mind	Comment noted
		p. 21	Whilst the references to the Sustrans manual and the "Making Space for Cycling" document are good starting points. The Design Guide also needs to take account of the work on Cycling infrastructure being done by: Transport for London (TFL) and Transport for Greater Manchester (TGM) as well as a number of other bodies such as those of Waltham Forrest where there has been some pioneering work done in their development of a "Mini Holland". It will also need to have system to frequently update references.	Comment noted
Respondent 29	Historic England		No Comments	Comments noted
Respondent 19	KC Conservation and Design	P14	"Highway designers should..." in relation to trees and retaining them I feel it is key that space is afforded to them and this should be stated in the guide. Equally reference should be made to an arboricultural method statement etc. which is mentioned later in the document.	Comment noted

		P16 xix	Is it worth re-emphasising that highway design is a multi-disciplined approach? A lot of the text in this part is multi-disciplined so perhaps it's worth saying this?	Comments noted. Amended SPD to reflect further emphasis on multidisciplinary approach
		P18	The box states that a Statement of Compliance is needed in a D&A but this is not mentioned in the supporting text. Perhaps it should be?	Comment noted. The council feels that this is suitable referenced within the SPD and does not require further text.

		P20 para. 1.2	would suggest "carefully sited street trees"	Comment Noted. Amended SPD to include proposed wording.
		P29 table 1	Too squashed perhaps it is worth expanding onto a single page? Actually this applies to all tables really.	Comment noted and expanded to half page
		P30	Would a diagram or drawing be useful in describing the different types of hierarchy?	Comment noted
		P42	Photo under 3.60, is this good or bad practice? Does not look good practice, more of a trip hazard.	Comments noted. Photo removed from SPD.
			Any references to Secure by Design needed? Should the reader be asked to look at or contact ALO?	Comment noted.

Respondent 19	KC Conservation and Design	2.21	<p>Tree canopies should be kept at a height below the lights. Will this not just continually block the lamp glow?</p> <p>Then what happens to all our existing trees on highways that have grown up and been pruned above the lamp glow, will we have to go around every one of these trees topping them all, do we have the resources to do this. A little facetious I know but I am bemuse by this very misguided text.</p> <p>This text needs changing to the following:          “Achieving an efficient lighting design can be more challenging on tree lined highways. This is because it can be difficult to achieve and maintain acceptable lighting levels when grass verges and trees are located between the footway and the highway. In these circumstances it may be necessary to minimise the width of grass verges and ensure tree canopies and suitably managed to minimise their interference until such size that their canopies are above the lighting columns. Street lighting is often dual purpose and must adequately illuminate both the highway and the footway.”</p>	<p>Comments noted and response/amendment likely required</p> <p>Note this comment relates to 4.21, which has been amended accordingly</p>
		Para. 4.4	<p>The word ‘protected’ needs omitting. Is a protected tree a proposed or existing feature and what about all trees, retained, removed as part of the proposal etc.’ ‘Trees’ on its own covers the point better?</p>	<p>Comment noted. Amended paragraph to remove ‘protected’</p>
		Para. 4.5	<p>The wording needs to include reference to existing features which are retained. We should not simply be looking at a blank canvas on every scheme, existing, established landscape features can greatly contribute to schemes. I’d suggest that the simplest way to address this is to refer to ‘retained and new planted’ - trees, shrubs and grass. Although ideally this paragraph could do with more work to fully re-word.</p>	<p>Comment noted. Amended to add ‘retained and new planted’</p>

		Key Driver 16	<p>This is wildly ambitious. Is it realistic, practical or reasonable to expect extensive tree planting to be proposed on all street corridors? I'm fully supportive of tree planting but it has to be the right trees in the right place and actually feasible that the trees might continue to be viable over the long term. An exception that all new street schemes will have extensive planting, unless there's a 'valid and robust reason not to', is going to have a significant impact on future planning proposal. The word 'proposed' needs changing for 'considered' and 'Extensive' should be omitted completely.</p>	<p>Comment noted. Added 'where feasible', and changed 'extensive' to 'appropriate'</p>
		Para. 4.12	<p>"Likewise, trees within sustainable urban drainage systems should be able to flourish in wet conditions. Species choice should not just be restricted to wet conditions, what about drought or hard standing tolerance etc. This needs changing to 'Likewise species choice should be suitable for the proposed site's growing conditions'. "Ideally, only trees of fastigiated form should be situated alongside the carriageway, due to their slender and upright nature." This statement would rule out most tree species and narrow the street scene down to a hand full of trees. While I understand the sentiment, and appreciate that fastigate form trees can be a useful tool to aid tree planting in street locations, the statement is too restrictive. There are carriage ways where other tree forms may be appropriate. This needs changing to say: 'consideration should be given to using fastigate form trees on constrained sites'.</p>	<p>Comments noted. Document amended according to proposed changes.</p>
		Para. 4.13	<p>"Trees should be of slender girth when mature, and have no foliage lower than 2.1 metres over the footway, or 4.6m over the carriageway. This can be achieved through selective planting and formative pruning. A trees natural capacity to deal</p>	<p>Comments noted. Changed accordingly and clarified that</p>

		<p>with ground conditions should be considered and where possible aid drainage. Trees can also be utilised to aid storm water and infiltration.”</p> <p>This needs removing completely. It is technically in correct and makes no sense. The description of the end tree is unrealistic and this type of tree simply does not exist. Formative pruning (normally done at a young age) will not allow for these kinds of head room in later life, this will have to be done via on going routine maintenance pruning though out the tree’s life. In addition we normally work to 5.5m for head room over a carriage way. And how does a tree aid storm water and infiltration? I can try and assume the meaning of this text but it is far from clear. “The Council recommends the retention of existing healthy trees unless a full arboricultural survey suggests otherwise.”</p> <p>Why would a full arboricultural survey suggest the removal of a healthy tree? The point of a survey is to normally assess the condition of trees. Wording from our existing planning policy PLP 33 could be utilised here so I suggest that this is reworded to say:</p> <p>‘Designs should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment. The condition of trees, and their suitability for retention, should be based on an arboricultural survey and arboricultural expert advice.</p> <p>“The Council’s Forestry Section is able to provide further guidance.”</p> <p>Can Forestry provided info on this? Or would that be Planning or Landscapes.</p>	<p>the Council is able to provide further guidance.</p>
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		Para. 4.16	<p>I think this has been sorted in relation to the hyperlink to the BS. May be worth checking other links if appropriate. In terms of the reference to the BS this now needs to be changed so it is no longer in blue.</p> <p>The technical detail in this statement is incorrect. The whole paragraph needs deleting and replacing with:  “Existing trees to be retained for adoption must be subject to a condition survey in accordance with industry best practice and have any tree work carried out to the satisfaction of the Council.” reference to BS 5837 would be better placed in one of the above paragraphs and read as follows:</p>	Comments noted. changed accordingly
			<p>“To ensure conflicts with either existing trees, or newly planted trees, are minimised, designs will need to comply with British Standards BS 5837, Trees in Relation to Design, Demolition and Construction- Recommendations, and where necessary utilise appropriate underground infrastructure.”</p>	
		Para. 4.14 & 4.18	<p>Needs deleting and replacing with:  “Where street trees are proposed these should be planted in suitable tree pits and, where necessary incorporate root barriers, drainage systems and adequate soil capacity to prevent root ingress into services or damage to the highway. Furthermore, trees should have no guardrails or recessed areas that collect litter.”</p>	Comments noted. Amendments to the paragraph have been made
Respondent 4	Wakefield Council		No Comments	Comments Noted

Respondent 5		P. 9 map of district	The map implies that the road joining the A629 to the A636 via Kirkburton to Scissett, Shelley (not shown!) and Skelmanthorpe (not shown!) is an 'A' road. It is not. It is the B6116 - an already overloaded, country road through 3 villages and currently a 'high accident route' with many constrictions along its entire length.	Comment noted. Map amended to include B6116 in the key
		Para. 3.34	states that the design standards for visibility, stopping sight distance, design speed, etc. should be in compliance with the DMRB (Design Manual for Road And Bridgeworks) where the traffic flows on the external roads, with which the development road is joining, exceed 10,000 v.p.d. or where vehicle speeds exceed 37 mph  These criteria might not indicate most or all of the situations where the use of DMRB standards are appropriate. In many situations the use of Standards based on the proposed Design Guide or Manual for Streets will NOT BE APPROPRIATE where traffic flows do not reach 10,000 v.p.d.	Comment noted.
		p.17	The approach to shared spaces/areas is still, to some extent, experimental and a number of reservations have been expressed by difference experts. The safety record of this approach over a medium/longer term is not yet proven.  We also feel the use of block paving represents a medium to long term maintenance issue and likely increased costs to residents on unadopted roads subject to developer/private maintenance contractor agreements in particular.	Comments noted. The SPD is aligned with the government endorsed guidance on shared space and inclusive mobility
		Para. 3.8	The Council should be 'requiring' NOT just 'encouraging' developers!  Yet another example of the overall lack of prescription in this document.	Comments noted

			<p>It is a concern that the Council appear to be divesting themselves of any responsibility for general street landscape maintenance. Who is responsible for monitoring and enforcement of the stated private management contractors' appointed by developers and their contractual obligations long term? Who will monitor that residents will not be subject to excessively increasing charges (as seen with the recent leasehold scandal)?</p> <p>The same comments would also appear to apply to SUDS proposals. This entire section appears 'short term' and kicks a can of long term issues 'down the road'.</p> <p>It is a concern that so many new development roads could end up 'unadopted' and therefore, not subject to the full scrutiny, inspection and testing currently carried out by Utility Companies - the perfect excuse for cheap and sub-standard work by developers only concerned with maintaining and increasing their profit margins.</p> <p>From our local experience, we believe the Council is storing up massive, future drainage issues and their associated costs. Maximum prescription is needed, not loopholes to be exploited.</p>	Comments Noted
Respondent 6			10 principles of highway design	Comments noted. Site HS137 (formerly H358) is allocated



		<p>I absolutely agree with the 10 principles of highway design and I really hope that Kirklees Council will strongly adhere to these principles in full when examining any planning applications.</p> <p>For example - a current proposal for a housing development within the Kirklees plan (H358 in Emley) appears to totally disregard the priority, inclusivity, connectivity, safety and sustainability principles. As residents we are being bombarded by a private company working for developers pressing for site access via the single lane, historical road of Warburton. This road has no pavements, is extremely narrow, runs alongside a children's recreation area and the ancient terraced houses open directly onto the street. There is no off road parking, further narrowing the access.</p> <p>Any increase in traffic will make this road incredibly unsafe. The safety issues will affect everyone but will particularly affect children and those with less mobility. It is not a proposal that is sustainable in that transport links to local towns are minimal. It is not a proposal that prioritises pedestrians and cyclists. It also does not integrate with the unique and historical setting.</p> <p>If Kirklees Council is serious about its vision and framework for highway development then it cannot entertain such absurd access proposals.</p>	<p>in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>
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Respondent 7		<p>I would like to comment on the hypocritical visions of Kirklees regarding H358 to the Highway Design Guide.</p> <p>Putting pedestrians and cyclists first, incentivising walking and cycling in a secure and pleasant environment, providing protection from motor vehicles, delivering design that reduces car travel and fuel consumption and where the needs of people rather than vehicles shape the area.</p> <p>I feel H358 contradicts all of the above. H358 leads onto a single track Lane with no footpaths, alongside the only children's playground in Emley or Emley Moor. We regularly take our nearly 3 year old child to the playground and also the millennium green walking up Warburton from upper lane. It is already difficult walking up that</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>
		<p>section with a child and we currently have to move to the side for moving cars and pick our child up as cars pass due no footpaths. This is also a problem for elderly and disabled wheelchair users. This would be even more hazardous with increased traffic from H358. Additional vehicles going up the tight single track lane with no footpaths would be a real safety concern. This combined with gridlock and air pollution from the Stationary traffic going up the lane and also coming down attempting to join upper lane that is already stretched.</p> <p>Upper lane is already under huge demand from traffic cutting through the village. The stress of additional Traffic from H358 would be a recipe for disaster where footpaths are scant or non-existent. The entire village is already busy at peak times with queuing traffic and would be completely gridlocked and unsafe for pedestrians and cyclists and again higher levels of Air pollution from Gridlocked traffic. Public Transport isn't a viable option for most people getting to and from work from Emley and Emley Moor adding to traffic congestion.</p> <p>I fail to find any positives to H358 and would like to see the Removal of H358 from Kirklees local plan.</p>	

Respondent 8			<p>From reading the SPD document it is clear that Kirklees places a great deal of importance on the safe use of the highways and roads by pedestrians and cyclists. I find it hard to understand how this safe use attitude works with the intended future use of Warburton. The current access up Warburton is barely adequate for the level of traffic it handles at the moment, being single track with no footpaths, there is no protection for road users that are not in cars. This road also passes the village playground, putting children at risk, which would only increase with more residents and guests driving along it, as well as their children using the playground. Also the increased traffic would feed onto Upper Lane, where footpaths are scant or non-existent. This would become horribly gridlocked at commuter times and other busy times of the day. The public transport situation in the village is not good, which will only be exacerbated by the increase in the number of residents using it.</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD</p>
Respondent 20	Peak District National Park Authority	Page 9, Map of District	<p>We are pleased to see that the Peak District National Park is included within the map. However, as it is shown in the same colour as the main settlements, this could give the impression that the design guide will apply within the National Park. For clarity, it would be useful to both show the National Park in a different colour to the main Kirklees settlements. We would also recommend that the Guide provides a statement to the effect that land within the National Park is not subject to either the Kirklees Local Plan or the Highways Design Guide Supplementary Planning Document.</p>	<p>Comment noted. Changed to include shading on Peak Park</p>
			<p>Whilst the scope of the Highways Design Guide SPD lies outside the National Park, development on or in close proximity to the boundary has the potential to bring visual impacts both to and from the National Park. In delivering any development including through the Highways Design Guide consideration need to be given to the Section 62 Duty of the Environment Act (1995), which directs Kirklees Council to have regard to National Park purposes when undertaking or permitting development which may affect the setting of the National Park.</p>	<p>Comment noted</p>

Respondent 9			<p>In respect of H358 development proposal in Emley, the site is accessed by a single track carriageway (Warburton) where for parts, there is no pedestrian pavement and houses open directly onto the roadside. A proposed 44 house development with only the above access would not encompass any aspect of High Standard Highway Design.</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD</p>
Respondent 10			<p>H358 leading onto a single track with no pavement in Emley leading onto Upper Lane</p> <p>I want to put forward my comments and grievance for review and discussion regarding the proposed development of 44 houses in Emley via Green Acre Close.</p> <p>I have reviewed the Highway design guidelines and I feel this development proposal is against a number of items within the guidelines where it refers to 1.0 Prioritising Pedestrians 2.0 Cycling Infrastructure 3.0 Streets</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD</p>

		<p>The Vision states " Traffic &amp; other activities are integrated where needs of the people shape the area"</p> <p>People movement for people with health conditions, impairments, elderly &amp; children are prioritised. Where walking and cycling is the most important modes of transport. Highway design is to ensure walking areas are safe, welcoming &amp; secure. Pedestrians are prioritised where access is required direct to buses, schools, local facilities. There needs to be inclusive design at the outset.</p> <p>This is in direct contrast to the proposed plans where access to the new housing development is via Warburton technically a side road with limited width, lighting and no pavements. Currently residents in Warburton, Green Acres &amp; Saxon Close walk up the street and step to onside between the parked cars if there are any cars, vans, horse boxes, delivery vans coming up the street and there is a caring relationship between passing cars and pedestrians. If there was another 44 houses and potentially 88 cars not taking into consideration, friends, family and delivery vans this is not safe and definitely not sustainable. There is a children's play area and additional cars coming up Warburton would put safety at risk. The houses down Warburton have on road parking and this means there is only room for 1 car at a time to move up and down approx. 150 yards of the road around the corner from Greenacres. We currently wait for cars to come through as it is single lane traffic but the addition of 80 cars to this current proposal is again not sustainable. Additional traffic will mean access to the main road "Upper Lane" will be significantly more difficult especially at peak times. There is on street parking in the village itself i.e. Upper Lane and another 88 cars commuting to Leeds, Huddersfield Wakefield will make it more difficult for pedestrians, cyclists and of course car drivers as there is no industry in the village and it is essentially a commuter village. Again these difficulties are in contrast to your design vision</p> <p>I understand the need for housing and especially affordable housing but without robust infrastructure this will make it untenable for the people who already live in this small village.</p> <p>I request that my comments are taking into consideration as part of the plans scrutiny meeting and the outline of the planning application for Emley village</p>	
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<p>Respondent 11</p>		<p>I have read the long awaited draft Highways Consultation document and hoped the even longer awaited traffic and highways plan for Emley would be included. Emley does get mentioned under - Introduction, Kirklees Context: xvi 'Away from the large urban settlements, some small villages of a traditional character remain, such as those at Emley and Upper Hopton' - and that appears to be it.</p> <p>This document sets out Kirklees 'Vision' for the interior design of new housing estates and does not take into account the established settlements and existing highways, footpaths (or lack of in the case of Emley) and public transport (again lack of, in the case of Emley) where the new housing estates are being planned and developed.</p> <p>Overarching gold standard statements such as 'The most successful streets are those where traffic and other activities have been integrated together, and where buildings and spaces, and the needs of people, rather than vehicles, shape the area and create a sense of place' and 'Priority: Putting pedestrians and cyclists first by designing vehicular routes that minimise barriers to their movement and their safety' and so on are frankly ludicrous when looking at site H358 in Kirklees Local Plan.</p> <p>Emley is now awaiting an Outline Planning Application for site H358 in the next week or so. The plans show a development of some 45 houses with one access road via Green Acres Close onto Warburton. Warburton is a narrow lane, the majority of the time only a single vehicle width with NO footpaths. The only playground and recreation area for children in Emley and Emley Moor is on Warburton. The majority of houses on Warburton have no off road parking. Service and emergency vehicles have difficulties reaching properties on Warburton, Green Acres Close, Saxon Close and Church Hill Farm. Warburton leads to Upper Lane, the main road through Emley. There are sporadic stretches of footpath on Upper Lane and again many houses have no off road parking.</p> <p>Many more housing developments are being planned in the Denby Dale and Kirkburton Wards - particularly Skelmanthorpe and Highburton - which will bring hundreds more commuter vehicles through Emley to reach the A636 for access to the M1. These will</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>
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			<p>not be cyclists or pedestrians travelling to work and is not sustainable in any shape or form.</p> <p>Bearing in mind the Office of National Statistics has downgraded the number of houses required by some councils by 20%, locations where sustainable development is not viable should be revisited for planning purposes.</p>	
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<p>Respondent 12</p>		<p>I am writing to oppose the proposal to build on site H358 in Emley, HD8.</p> <p>Our opposition is based on the following;</p> <p>Emley is already a rat run for commuters trying to get to the Huddersfield or the M1, Wakefield etc. This will only become worse if planned developments in Skelmanthorpe, Highburton etc. of several hundred houses come to fruition. The use of Emley as a commuter route causes horrendous problems for traffic flow especially as there are several choke points in the village. These choke points are caused as residents have no alternative but to park on the main road through Emley due to not having off road parking reducing the road to just wide enough for one vehicle. At peak time traffic backs up in both directions and it can take some time to get past these stretches. Even at non peak times these choke points are difficult to navigate especially for traffic going in the direction of the motorway.</p> <p>Due to the delays getting through Emley some of the commuter traffic is diverting down the side roads going past the village school creating additional risk to school children.</p> <p>The proposed development of this land would add a large number of cars and other vehicles to this already difficult situation with potentially hundreds of additional journeys per day. Lacking public transport and the distances to train stations and places of works means whoever lives on this development will have no option but to use cars and there are likely to be at least two per property plus visitors, deliveries etc.</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>
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			<p>Furthermore Warburton, which is the only route of access to the site on the current plan, itself is little more than a small lane with no pavement and no off street parking for a significant portion of it and no means to provide these. We walk on this lane and already have to dodge cars as there is no pavement to walk on and already see the difficulties posed when cars are going down it in opposite directions and cannot pass as again there is only barely enough width for one vehicle at a time. We have also seen when deliveries are taking place vans completely blocking the road for both directions of travel and have been told of an incident when an ambulance could not get down the road as the space was too narrow for it.</p> <p>How this road can be deemed suitable for considerable additional traffic does not make sense as once again adding the potential for several hundred more journeys on this stretch of road would add to the chaos and put at more risk pedestrians including school children who walk up the lane to and from school and to get to the playground and recreational area.</p> <p>Whilst the little stretch of or road at Greenacres does have a pavement this is similarly only a narrow road with residents parking on it and along with Warburton's usually only has width enough for one vehicle to pass. As vehicles are often parked at the end of this road on Warburton's getting out of this stretch is also a tight squeeze.</p> <p>We understand that the site in question was only deemed suitable due to access being possible from two points but that as access cannot now be gained from Wentworth the suitability of this land for building homes is wholly inappropriate.</p> <p>However even if access via the Wentworth estate side was possible the situation there is hardly better than on Warburton with residents parking making the road similarly only single lane for significant stretches and crucially especially so near the junction with Beaumont Street where vehicles are parked not just by residents</p>	
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			<p>on the estate but also neighbouring roads. As there are always vehicles parked near</p>	
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		<p>the junction/entrance to this road this choke point means cars turning in from the main road often have to stop to wait for a car coming out occasionally still sticking out onto the main road. This is a constant issue which would only be made worse by the addition of potentially several hundred more journeys through there every day.</p> <p>There is also the potential that should access be possible to the site from both Warburton's and Wentworth side that this would itself become a rat run to bypass the choke point through the middle of Emley on Upper Lane and these roads and the way they are used make this totally inappropriate.</p> <p>I would also add that the first choke point through the village is directly opposite the entrance to Wentworth Drive and this already causes great difficulty in exiting this side road as traffic on the main road coming from the direction of Emley Moor has no option but to drive on the wrong side of the road to get round the parked row of cars on their own side. We have witnessed several near misses here (not helped by many drivers going at inappropriate speed).</p> <p>Whilst we have concentrated our concerns on should the land be built on the site is also not appropriate for access for the actual building process. Neither Warburton's or Wentworth are easily navigable by anything other than medium sized vans and the large lorries typically seen delivering goods to building sites would physically not fit. If a Sainsbury delivery van struggles to get up the road a tipper type truck, or one carrying materials or a cement mixer etc. will find it impossible and would cause total gridlock should they attempt it.</p> <p>In summary we believe that the traffic problems in the village are bad enough not to willingly add to it, not only will this proposed estate add to the already existing congestion it would also increase the risk of accidents with pedestrians. The proposed access roads be it just Warburton's or along with Wentworth Drive are just not suitable for the additional traffic that would be created, and the proposal</p>	
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			<p>itself goes against Kirklees Council's own policy regarding new developments and impact on the existing area and residents.</p>	
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			<p>The council's own Highway Design Principle states it expects from developers that they put pedestrians and cyclist first, that they incentivise walking and cycling in a secure and pleasant environment, that they provide protection from motor vehicles and that their designs reduce vehicle use and fuel consumption and that the needs of people rather than vehicles shape the area. Allowing the development of this site goes directly opposite the Highway Design Principle, pedestrians and cyclist will be put in greater danger by the increased traffic (especially at the long stretches of Warburton where there is no pavement and no option but to already walk on the road) which will make the environment less secure and less pleasant. As Emley is poorly served by public transport developing here does nothing but increase the amount of vehicle use and fuel consumption and the needs of people are not being put first.</p> <p>The Local Plan should be as much about the existing communities as well as any proposed new builds. The proposal to build on this land should also be taken in context of the impact on the traffic in the village of all the plans to build in the area and not just this site in isolation.</p>	
Respondent 21	Sanderson Associates (Consulting Engineers) Ltd		Produced in partnership with Jones Homes, see their comments	See responses to Jones Homes Comment

Respondent 22	Pennine Cloud Co		<p>Dear Sir/Madam,</p> <p>Thank you for the opportunity to comment on the DRAFT HIGHWAYS DEVELOPMENT PLAN.</p> <p>I do so as a resident and business owner in Kirklees. Plus, as a private sector member of the Leeds City Region Enterprise Partnership (the LEP). I sit on the Business Innovation and Growth Panel. I am championing the City Region's new Digital Framework.</p>	Comments noted
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		<p>The Digital Framework covers 5 keys themes aimed at unlocking the benefits and opportunities of the digital economy for all: (1) traditional businesses using digital for competitive advantage; (2) digital skills; (3) infrastructure; (4) tech sector; (5) tech for good - a smarter city region.</p> <p>My response to your consultation will consider use of digital technologies on our highways.</p> <p>We need to take into account how superfast broadband and 5G are rolled out across the region. Technologists are now taking about use of smart street furniture, green powered street lighting, and the Internet of Things to illuminate dark data and make decisions on traffic flow. Road design needs to ensure that trunking is made available for all utilities, including broadband fibre optics and possible relay systems for 5G on lamp posts. Any new build properties adjoining roads will also require access to connectivity with least amount of disruption to traffic flows etc., by road works.</p> <p>I am aware that discussions are taking place about relieving congestion in Holmfirth town centre. Both the University of Leeds Institute of Transport and Sheffield University have already signalled that traffic congestion is best dealt with using digital/online technologies. This is far preferable than pulling down heritage buildings and dividing town centres by building new roads right through the centres. Certainly I would ask Kirklees Council to consider further collaboration with these two top Yorkshire universities around deployment of digital technologies to build a smarter road network across the region. Particularly across trans-Pennine routes. This is something which the LEP and Combined Authority are interested in doing to help drive the new digital framework. One of the reasons why we hosted an event in Holmfirth in September last.</p>	
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Respondent 13			<p>H358</p> <p>I would like to raise my concerns that in no respect does the proposed entry and exit route via Warburton comply with values set out in 'Highway Design Principles</p> <p>POINT 1 Priority Putting pedestrians and cyclists first and ensuring their safety</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination</p>
			<p>FAIL No footpaths or pedestrian refuge the entire length of Warburton. In addition the cottages whose residents only exit from their property is immediately into the roadway. Due to the lack of driveways parking on this section renders Warburton single track. The proposed plan would increase traffic by a conservative estimate of 120 vehicle journeys per day. Such volumes make it impossible to guarantee the safety of young and old. Points 2 to 10 all FAIL on the unworkability of POINT 1</p>	<p>and is not part of the Highway Design Guide SPD.</p>
Respondent 23	Morley Town Council (The Town Clerk for and on behalf of)		<p>The document is entitled "Consultation Draft" but with whom. It is a concern that this document may not have been widely publicised or circulated to local interest groups, neighbouring authorities and Parish / Town Councils in the area.</p> <p>Consultation should be repeated with direct contact to all local interest groups, neighbouring authorities and Parish / Town Councils.</p>	<p>Comment noted</p>
			<p>Section 3 of the document contains confusing wording and emphasis about the design parameters to be used for estate roads where in some parts these should [be] used as starting points and in others as standard – which are they?</p> <p>Another example of this is the definition of Type c Shared Space streets - in one sentence it suggests the surface will be shared by pedestrians and motor vehicles but in the next it says "pedestrians can safely share the whole street with vehicles; however designated pedestrian routes should still be available for more vulnerable pedestrians e.g. elderly people, disabled people and those with children." So what are they – shared or not?</p>	<p>Comment noted.</p>

			<p>KMC has previously included parking guidance for residential and non-residential uses in their UDP. The proposed HDG provides guidance on residential uses similar to the previous guidance but provides none for other non-residential uses. The lack of any guidance on the level of parking provision for non-residential uses will suggest to developers that they might be able to reduce the provision within their developments and result in overspill parking on adjacent streets</p> <p>Amend wording in Section 3 to make use of design parameters clearer, provide guidance for parking provision for non-residential developments and make definition of Shared Space Streets clearer.</p>	<p>Comments noted. The council feels the SPD adequately reflects parking guidance</p>
			<p>In the Appendix reference is made to the Council's Highways Guidance Document - S278 procedure and other documents such as the Section 38 Procedure and the Council's Road Safety Audit procedures. As these documents are referred to the HDG then they should also be available to the public to comment on but they would appear not to be so how can one reasonably comment on an incomplete document.</p> <p>The content of the Appendix infers that the Council will have a greater role in carrying out the detailed design of highway works. Whilst this might be welcomed, it does beg the question whether the Council has the resources to service this demand now and in the future, particularly with increasing budget pressures from Central government.</p> <p>Also in the Appendix there is a checklist for designers to cater for motorcycles. Why is there not a similar checklist for pedestrians and pedal cyclists? These road user groups should not be forgotten.</p> <p>When the HDG consultation is repeated then the Council documents referred to therein should be readily available to allow full and proper comment on all of them.</p> <p>A checklist for designers for pedestrians and cyclists should also be included.</p>	<p>Comment noted. The guidance for motorcycles has been removed</p>

Respondent 24	Via Solutions		The document title says Consultation Draft but the question is with who. Whilst rumours of a revised HDG for Kirklees have been around for a while this consultation has not been widely advertised nor has it been circulated widely to local highway consultancies directly. When we contacted KMC Highways about this we got no response from officers.	Comment noted. Consultation has been undertaken in line with the adopted SCI
		Xviii on page 8	Worthy of note that this says "Kirklees comprises steep valley topography that in some areas can make highway design and access challenging". Highways Officers need to take more account of this statement particularly those dealing with road adoptions.	Comment noted
		Para 1.12 on page 18	Says "Inclusive Mobility sets out standards" whereas para 1.9 says "guidance". The latter is correct as the actual document states it is for guidance.	Comment noted. Changed accordingly

		Para 2.6b on Page 22	Only quotes guidance from Design Manual for Roads and Bridges - this is only applicable on Trunk Roads. No mention is made of visibility requirements within Manual for Streets which would be applicable in built up areas.	Comment noted
			Fails to mention that in MfS2 the use of the design parameters within that document in low speed environments is applicable in all urban areas and totally fails to mention rural roads where speeds are constrained. Include reference to use of MfS parameters on urban and rural roads where vehicle speeds are constrained to 37mph or less	Comments noted. Document signposts the MfS and MfS2 within the document
		Para. 3.6	Concentrates too much on place and movement which is explained more appropriately in MfS2 Include reference to MfS2 and relevant sections within that.	Comments noted

		Para 3.7	<p>Notes use of maximum speed of 20mph but needs to recognise that in certain circumstances actual speeds might be less and so designing to a maximum can be counterproductive.</p> <p>Also the wording confuses the roles of the “Designer” and those who would be undertaking a Road Safety Audit.</p> <p>Revise wording to suggest that should the proposed highways be designed in a manner that vehicles speeds are constrained a lower design speed could be used in developing forward visibility envelopes on tight bends for example.</p> <p>Revise wording when including reference to Road Safety Audit of internal layout as this is twisting the role of this process.</p>	Comments noted. Changed to reflect revisions from the comments
		Para 3.8 and Table 1	<p>Contradicts the constructive thinking in para 3.7 which states “Table 1 outlines design parameters based upon the number of dwellings to be served” and should be considered as a “starting point”. The wording in para 3.8 contradicts this by saying that the Council encourages highways to a “standard” which can be adopted and be designed to “comply with the following range of requirements” given in table 1.</p> <p>The above wording is likely to lead to overly prescriptive road designs with no design variation to suit topographic or environmental circumstances. For example for Type B streets Table 1 suggests a 2m footway on each side – this may be unnecessary in certain circumstances and so should be recognised here.</p>	Comments noted
			Amend wording in para 3.8 to be more akin to para 3.7. See comment above about Table 1 Type B streets.	

		Para. 3.14	<p>This sets out requirements for Shared Space streets. The wording is confusing as in one sentence it suggests the surface will be shared by pedestrians and motor vehicles but in the next it says “pedestrians can safely share the whole street with vehicles; however designated pedestrian routes should still be available for more vulnerable pedestrians e.g. elderly people, disabled people and those with children.” So in other words the Type C streets are not shared spaces at all.</p> <p>Change wording of para3.14 clearer in terms of usage of designated pedestrian routes” in shared space streets</p>	Comments noted
		Paras 3.15 and 3.16	<p>It should be made clearer to potential developers why private roads need to be laid out to an adoptable standard. There may be environmental and conservation reasons why such a requirement might be difficult to achieve and this needs to be taken account of by the Council.</p>	Comments noted. Amended wording to ‘appropriate standard’
		Para 3.20 and Table 2 and 3.21	<p>Again, the Council appears to be overly prescriptive road designs with no design variation to suit topographic or environmental circumstances. Table 2 indicate no real difference in design standards between Major and Minor industrial estate roads. On smaller estates this could lead to an over dominance of the highway width compared to that remaining for the built form. Para 3.23 indicates these “may be required” so this needs to be made clearer earlier</p>	Comments noted. Added ‘or provide justification on not being able to meet the guidance’
		Para. 3.23	<p>Specifies minimum of two staff parking spaces per unit but this is not repeated in the parking section of the document.</p> <p>It then suggests the shared turning head should “be a minimum of 25m (radius)”. It is not clear whether this means the external edge of the turning area but if it is this is over large / excessive and so this might be a typographic error (perhaps should read diameter)? Leeds CC guidance indicates a 20m x 20m turning head is adequate which again suggests this is a typo.</p>	Comments noted. Corrected typo
		Para. 3.26	<p>Manual for Streets suggests that the use of DMRB standards even on higher order roads is not always applicable in all scenarios and MfS should be seen as a starting</p>	Comments noted

			point and could be used on roads carrying 10000 vehicles per day. This goes back to earlier comments (para 3.6) on the Council not taking heed of the guidance in MfS2	
		Paras 3.28 to 3.30	<p>The document fails to consider the scenario that providing there is reasonable forward visibility on bends then it is not unusual or unreasonable to expect an element of give and take between drivers particularly when one of those is a refuse or delivery vehicle. All too often at KMC there is a requirement to provide significant widening on tight bends serving very small numbers of dwellings so the chances of one vehicle meeting another are much reduced.</p> <p>The HDG needs to provide support to Officers in encouraging designs which are more in keeping and pragmatic having due regard to the scale of development the road is being designed to serve.</p>	Comments noted
		Para 3.32 and Table 4	<p>This section fails to take account of the advice within Manual for Streets on junction spacing – the danger will be is that the figures in Table 4 will become prescriptive rather than recommended as the sentence prior to that suggests. It also suggests that cross roads would only be considered on the lowest order of streets (Type C) which are shared with pedestrians – this again contradicts Manual for Streets guidance and is almost “old school”.</p> <p>Revise text to be more in line with the guidance in Manual for Streets 1 and 2.</p>	Comments noted. Updated to ‘guidance’
		Para. 3.33	<p>Fails to mention that in MfS2 the use of the design parameters within that document in low speed environments is applicable in all urban areas and totally fails to mention rural roads where speeds are constrained.</p> <p>Include reference to use of MfS parameters on urban and rural roads where vehicle speeds are constrained to 37mph or less.</p>	Comments noted

		Paras 3.36 / table 5 and 3.37	The proposals here are welcomed but with the caveat that with such small radii, Officers might be inclined to require swept path analyses which may then warrant significant widening of the minor roads to the detriment of pedestrian safety due to increased crossing distances.	Comments noted
			It needs to be clearly stated in the text that the design of junctions needs to be one which balances the needs of pedestrians first and vehicles second.	
		Para. 3.40	As with para. 3.7 above, the wording confuses the role of who would be undertaking a Road Safety Audit within the design process	Comments noted. Wording Amended
		Para. 3.44	Due to resource difficulties within these organisations, expecting the emergency services to provide a response to a consultation from a developer for a proposal which has yet to be submitted for planning approval is naive	Comments noted. Changed to 'non-standard speed restraints' so fewer proposals would need to consult emergency services
		Para. 3.45 and 3.46	See comments on xviii and paras. 3.8 and 3.20	Noted, but retained
		Para. 4.7 and 4.10	It is unreasonable to expect a private management company to have to maintain the highway verges between the footways and carriageways that are required by the council particularly on Type A roads	Comments noted. Amended document to reflect this
		Para. 4.17	The wording of this paragraph gives mixed messages in terms of height of planting within visibility splays – which should it be – 600mm or 800mm?	Comment noted. Amended to correct visibility splay
		Para. 5.1	Misquotes NPPF paragraph – should be 105	Comment noted. Removed para number
		Paras 5.4 to 5.7	KMC has previously had extensive parking guidance for residential and nonresidential uses... The concern is that in the absence of any guidance than what methodology would be accepted by KMC to determine an appropriate level of parking provision for non-residential uses...	Comment noted

		Para. 5.14b	Seems to be inconsistent with para. 5.4	Comment noted. Para 5.4 changed to give more weight
		Para. 5.19	Trigger point of 10 or more housing units for requirement of a travel plan is impractical and unreasonable.	Comment noted. Threshold increased to 50 residential units.
		Para. 6.1	See comments on paras 3.28 to 3.30. the text on para 6.1 is supportive of the same	Comment noted
		Para. 6.10	KMC officers need to recognise that hard margins on residential estate roads allow for the overhanging of vehicles so this paragraph will need amending	Comment noted
		Para. 6.11	See comments on paras. 3.28 to 3.30. The text in para 6.11 is supportive of the same (need for widening on lightly trafficked roads)	Comment noted



		Para. 7.1	<p>This makes reference to the Council’s Highways Guidance Document - S278 procedure but when asked, this has not been finalised so how can one reasonably comment on an incomplete document.</p> <p>Having said the above the so called policy infers that any access for a development will require a Section 278 Agreement. This would not be cost effective for a small scale development requiring just a simple access on to the highway where the legal costs could exceed the costs of construction. A simple or mini S278 procedure or use of S184 of the Highways Act should be accommodated.</p> <p>The text also suggests the works must be undertaken by the Highway Authority and kept in house – it has to be questioned whether this is practicable (does KMC have the resources to do this) or reasonable (in terms of being anti-competitive) – it has been common practice to allow developers own contractors to do the work if they are approved by the Council. Also for a housing development the joining to the highway is often encompassed within the Section 38 Agreement to avoid additional legal costs. The wording of this paragraph suggests a performance of the Council in meeting developers’ requirements but makes no mention of actually having the resources to deliver this service in a timely and cost effective manner.</p> <p>Should be revised to allow mini S278 Agreements, use of S184 for minor works and to allow developers designers and contractors to carry out the works with the agreement of KMC. If all this is in the Highways Guidance Document then this should be made available for comment as well.</p>	Comments noted. The S278 procedure will be undertaken in line with the Highways Guidance Document, as noted in the SPD
		Para. 7.2	<p>This makes reference to the Council’s Section 278 Procedure and Section 38 Procedure documents. When asked, apparently neither of these documents have been finalised so how can one reasonably comment on an incomplete document(s).</p> <p>Mention is made of The Institute of Highways and Transportation – this is incorrect – should be the Chartered Institution of Highways and Transportation.</p> <p>One has to wonder if anyone drafting this document know anything about Road Safety Audits - HD19/05 does not exist – one assumes they mean HD19/15 which has now been superseded by GG119.</p>	Comment noted. Amended to GG119

			<p>With regard to the Section 38 Audits, why is there a different requirement placed on external audit teams compared to those carried out by the Council's own Audit Team? This is unreasonable and implies that an Audit to a lesser standard would be carried out by the Council.</p> <p>Mention is then made of the Kirklees Road Safety Audit Procedures which again is a document that is still in preparation.</p> <p>For Section 278 agreements, the document confirms that the design would be undertaken by KMC in house design team and audited by their own RSA people in line with their procedures as yet unpublished. See comments on 7.1 above for our concerns in this regard.</p> <p>The wording of this paragraph suggests a performance of the Council in meeting developers' requirements but makes no mention of actually having the resources to deliver this service in a timely and cost effective manner.</p>	<p>Comments noted. Amended to require same standard of audit regardless if undertaken Kirklees audit team</p>
		Para. 7.3	<p>This paragraph, whilst laudable in content, provides a checklist of matters to be considered for one road user group – what about pedestrians and pedal cyclists? We are not aware of any other HDG with such a level of detail. Perhaps should have spent more time drafting the missing Guidelines for S278, S38 and Road Safety Audit procedures</p> <p>Is this paragraph really necessary?</p>	<p>Comments noted. Paragraph removed.</p>

Respondent 25	Sport England		<p>I refer to the above document and your recent consultation with Sport England. Thank you for seeking our views on this matter.</p> <p>Sport England's remit and strategy has broadened beyond sport and now seeks to bring the benefits of regular physical activity to the public that don't regularly participate in sport. Our survey data has consistently told us that the most popular forms of physical activity are walking and cycling. Our design guidance Active Design is underpinned by the understanding that minor (but interlinked) changes to the physical environment can improve people's levels of physical activity. Within Active Design are a number of measures that concern 'active travel' and it is in this context that we have reviewed the SPD.</p>	Comment noted
			<p>In overall terms given the linkages between active travel and improved public health we find it odd that the introduction to the SPD does not explicitly acknowledge the linkages.</p> <p>Active Design sets out 10 key principles which we consider to be important to the creation of environments that offer individuals and communities the greatest potential to lead active and healthy lifestyles. It is considered that the following principles have a direct relationship to highways design:</p>	
			<p>Active for All. By this we mean Neighbourhoods, facilities and open spaces should be accessible to all users and should support sport and physical activity across all ages. Pointers to best practice in respect of highways design would be;</p> <ul style="list-style-type: none"> <li>- Are all facilities supported as appropriate by public conveniences, water fountains and, where appropriate, changing facilities to further increase their appeal to all?</li> <li>- Do public spaces and routes have generous levels of seating provided? -</li> <li>- Where shared surfaces occur, are the specific needs of the vulnerable pedestrian taken into account?</li> </ul>	Comment noted

			<p>Walkable communities by this we mean Homes, schools, shops, community facilities, workplaces, open spaces and sports facilities should be within easy reach of each other. Pointers to best practice in respect of highways design would be;</p> <ul style="list-style-type: none"> <li>- Are a diverse mix of land uses such as homes, schools, shops, jobs, relevant community facilities and open space provided within a comfortable (800m) walking distance? Is a broader range of land uses available within 5km cycling distance?</li> <li>- Are large, single purpose uniform land uses avoided?</li> <li>- Are walkable communities created, providing opportunities to facilitate initiatives such as walking buses to school, and providing the basic pattern of development to support a network of connected walking and cycling routes</li> </ul> <p>Connected Walking and Cycling Routes by this we mean All destinations should be connected by a direct, legible and integrated network of walking and cycling routes. Routes must be safe, well lit, overlooked, welcoming, well maintained, durable and clearly signposted. Active travel (walking and cycling) should be</p>	<p>Comment noted</p>
			<p>prioritised over other modes of transport. Pointers to best practice in respect of highways design would be;</p> <ul style="list-style-type: none"> <li>- Creation of a legible, integrated, direct, safe and attractive network of walking and cycling routes suitable for all users?</li> <li>- Prioritisation of pedestrian, cycle and public transport access ahead of the private car</li> <li>- Are the routes provided, where feasible, shorter and more direct than vehicular routes?</li> <li>- Are the walking and cycling routes provided safe, well lit, overlooked, welcoming, and well maintained, durable and clearly signposted? Do they avoid blind corners?</li> <li>- Do routes support all users including disabled people?</li> <li>- Are shared pedestrian and cycle ways clearly demarcated, taking the needs of the vulnerable pedestrian into account?</li> </ul>	

			<p>High Quality Streets and Spaces Flexible and durable high quality streets and public spaces should be promoted, employing high quality durable materials, street furniture and signage. Pointers to best practice in respect of highways design would be;</p> <ul style="list-style-type: none"> <li>- streets and spaces which are provided of a high quality, with durable materials, street furniture and signage</li> <li>- appropriate provision made to promote access to, and activity by, all users including providing safe route ways for vulnerable pedestrians</li> </ul>	Comment noted
			<p>Appropriate Infrastructure by this we mean supporting infrastructure to enable physical activity to take place should be provided across all contexts including workplaces, sports facilities and public space, to facilitate all forms of activity. Pointers to best practice in respect of highways design would be;</p> <ul style="list-style-type: none"> <li>- At major travel destinations are public toilets, showers and changing facilities provided? Are these accessible and usable by all potential users?</li> <li>- Are drinking fountains provided?</li> <li>- Is there a multitude of seating options provided? Is the seating provided accessible to all?</li> </ul>	Comment noted
			<ul style="list-style-type: none"> <li>- Is safe and secure cycle parking provided for all types of cycles including adapted cycles and trikes?</li> <li>- Is safe and secure pushchair storage provided where appropriate?</li> </ul>	

			<p>In broad terms we found much to commend within the SPD. But, as with the linkages to the public health agenda we would be more reassured that the Highways Design Guide would achieve its aims if it was clear in terms of scene setting that the promotion of walking and cycling requires complementary spatial measures in terms of the location of new development, density, mix of land-uses, and co-location of travel destinations. Equally ensuring walking and cycling is prioritised in new developments can be just as much about eliminating features within the surrounding area which discourage active travel as measures within a new development itself. So for example, Huddersfield’s inner ring road was created at a time when accommodating the needs of motorists was prioritised above the needs of pedestrians and cyclists and it forms a barrier in its current form disconnecting parts of the town centre from inner areas around it, whilst making walking and cycling use of arterial routes which cross it laboured. We trust you these comments your fullest consideration and would be grateful for confirmation as to when the Design Guidance is adopted by the Council.</p>	Comment noted
Respondent 26	Miller Homes		<p>Miller Homes was passed the SPD by a third party but were not directly contacted by KMC</p> <p>There is an ongoing issue with section 38 conditions set after planning permission has been granted – should all be agreed internally within KMC before planning permission granted. Current system sets onerous conditions with planning permission which states subject to s38 and highways approval</p>	Comment noted
		3.27	requires clarification, the council should not be able to insist upon features and then charge a commuted sum	Comment noted
		4.24	This photograph of the Miller Homes development at Lindley is misleading as the basins are not highway related, but to assist with flooding	Comment noted. The photograph is within a

				section on drainage solutions and is given to illustrate this
		6.9	Requires accommodation of large service vehicles – not achievable on existing or proposed developments. Would lead to a loss of land for housing which is unacceptable given housing targets.	Comments noted.
Respondent 27	Jones Homes (Yorkshire) Limited		It is hoped that this will not be the final consultation, another draft should be produced as there are a number of issues.  Workshops should be held, which we would be keen to participate in	Comments noted. Consultation has been undertaken in line with the adopted SCI
		Para. 1.12	Incorrectly states that inclusive mobility is a standard, but it is a guidance document	Comment noted. Amended to correct this
		Para 2.5	incorrectly refers to Disability Discrimination Act (DDA) regulations, which have been replaced with the Equalities Act 2010	Comment noted. Amended to correct this
		Para. 2.6	a minimum 'x' distance for cycle links of 2.4m is unnecessary – 1m is adequate in most cases for residential and industrial estates according to MfS	Comment noted. The MfS states that there are some issues with an 'x' distance of shorter than 2m, therefore no amendment suggested
		Para. 3.5 sentence 2	suggested wording – <i>'in order to ensure that allocated sites can be successfully bought forward developers will be expected to demonstrate that a corridor of suitable width is reserved in the lead in development which can accommodate a satisfactory future extension of the highway to serve the number of dwellings expected on the allocated site'</i>	Comment noted. Proposed wording not included as the wording in the SPD is considered appropriate
		Para. 3.7	Suggested wording – <i>'Designers will be required to demonstrate how proposed street layouts will achieve the selected design speed in practice; and street layouts will be subject to a stage 1 Road Safety Audit'</i>	Comment noted. Amended for clarification in line with suggestion

		Para. 3.8 and table 1	Too prescriptive and rigid, wording should be amended to allow more flexibility	Comment noted. Amended to allow for developers to justify why they haven't met these conditions, where appropriate
		Para 3.16 point iv	suggested wording: <i>The highway infrastructure is designed and constructed to an appropriate standard, commensurate with the guidance provided for an adoptable standard street</i>	Comment noted changed wording as proposed
		Para. 3.20	Prescriptive design parameters that are not considered to be appropriate	Comment noted. Added 'or provide justification on not being able to meet the guidance'
		Para. 3.22	Rigid application of standard from Design Manual for Roads and Bridges – should be changed to 'guidance'	Comment noted. Changed to say 'guidance' in table for under 20ha
		Para. 3.23	A shared turning point of 25m (radius) would be excessive. This appears to be an error and should be corrected to diameter	Comment noted. Amended to correct error
		Para. 3.24	It is not considered appropriate or necessary to state that gates should be set back 16.5m into a site – this is overly prescriptive. Suggested amendment: <i>'Where gates are proposed, they may need to be set back from the highway to ensure that commercial vehicles can pull off the highway to prevent blocking of passing pedestrians and vehicles on the major route'</i>	Comment noted. Amended to say '(or proportionately to the developments operational requirements)'
		Para. 3.27	Suggests that commuted sums will be calculated in accordance with guidance issued by DfT, but no reference is provided. This should be amended for clarity so that commuted sums do not place an unnecessary burden on development	Comment noted. Amended to reflect relevant body



		Para. 3.32	Suggest amending 90m junction spacing to 60m on 30mph major roads	Comment noted, but retained
		Para. 3.33	Suggests that MfS guidance only applies to built-up areas having a vehicle speed of 37mph or less  Unless evidence can be provided that it is necessary, it is not considered appropriate to rigidly apply DMRB standards for visibility on 30mph roads carrying more than 10,000 v.p.d	Comment noted. No change required as the MfS is signposted from the document
		Para. 3.36	it is considered that an 'x' distance of 1m may be acceptable in certain circumstances on lightly trafficked streets as confirmed in MfS	Comment noted – however, MfS states that this shorter 'x' distance has some issues

				The notes have been amended to allow for instances where a shorter or longer x distance may be justified
		Para. 3.40	Wording blurs the relationship of Designer and Road Safety Auditor	Comment noted. Wording amended to provide more clarity
		Para. 3.44	It is unrealistic to expect stakeholders to consult with the emergency services in all pre applications given the resources available to them. Wording should be amended to clarify that this is required in exceptional circumstances	Comment noted. Wording amended to clarify requirement only where a non-standard design element is proposed
		Para. 3.47	It is unclear why the normal minimum gradient of 1:80 is not appropriate in Kirklees – suggest amendment	Comment noted, but retained
		Para. 3.48	A requirement of 5.3m headroom will affect the ability to install street trees, as advocated in section 4 and is not consistent	Comment noted, but retained

		Para. 3.51, table 6	It is recommended that the minimum vertical curve lengths are reduced from 20m to 5m	Comment noted, but retained
		Para. 4.11	While street trees may be appropriate in some circumstances, this may not always be the case	Comment noted. Amended to allow more flexibility and clarity
		Para. 4.13	Foliage no lower than 4.6m above the carriageway is inconsistent with para.3.48 which sets out a minimum 5.3m clearance	Comment noted. Paragraph removed and replaced
		Para. 4.35	further clarity is required on the matter of concrete pipes  DMRB is intended for use in the design of trunk roads and motorways, not residential estates. DMRB states that it can be used by LA's with no Road Design Guide of their own, but motorways/trunk roads and residential estate roads are not directly comparable	Comment noted. Not changed  Comment noted. This guidance refers specifically to the need for larger tanks and culverts (150cm or larger) to

				obtain Approval in Principle in accordance with DMRB and is not blanket guidance.
			The 120-year liability for a commuted sum is not considered appropriate. It is strongly advised that further consultation between the Council and Yorkshire Water is required to rectify this crossover, as many prospective developments may become unviable due to this additional cost burden. 120-year liability is more appropriate for a bridge type structure rather than a carrier pipe	Comment noted

		Para 4.35	This suggests that a systematic regime and commuted sums would be required on internal diameters of 900mm and above, which the SPD classifies as an attenuation tank. This is vague and further clarification is required to determine the minimum internal diameter that would be classified as an attenuation tank to be managed and maintained by the council, noting that many of the pipe networks will be adopted by Yorkshire Water	Comment noted, no change proposed
		Para 5.19	The threshold for requiring Travel Plans for residential developments of 10 units and above is considered onerous. Smaller developments could be required to incorporate sustainable travel measures using a less formal Travel Plan process. Leeds City council has a detailed travel plan SPD that uses a threshold of 50 units, which we consider to be more reasonable	Comment noted. Threshold changed to 50 units
		Para. 6.9	It is not necessary for all highways to be designed to accommodate an 11.85m long refuse vehicle, many roads cannot safely accommodate such a vehicle and they are not used in Kirklees. This requirement will lead to less efficient use of land, making it harder to meet housing targets	Comment noted. Last sentence changed
		Para. 6.9	Insufficient detail about 11.85m vehicle, meaning it cannot be adequately assessed using swept path analysis	Comment noted but no change proposed
		Para. 6.9	tracking of the refuse vehicle should not be undertaken at a design speed of 15mph on street types a and b and 10mph on street type c. Vehicles will not be turning at these speeds and this will lead to over-engineered and inefficient development layouts. It is recommended that this note is removed from the SPD	Changed in line with recommended replacement sentence
		Para. 7.2	For minor works, where the safety implications are likely to be minimal, an audit in full accordance with GG119 should not be necessary.	Comment noted. SPD states 'unless otherwise agreed in writing with the council...'
				added and correction to GG119

			Also, it appears that this SPD would allow the council to undertake Road Safety Audit to a different standard than would be expected from a developers consultant	Comment noted. Amended to clarify that the same standards of RSA are required from the council and from consultants
			HD19/15 has now been superseded by GG119	Comment noted. Amended to reflect Update
Respondent 14			H358 I live on Warburton , it is a single track not enough room for 2 cars to pass, many of the cottages doors open directly onto the road, there are no footpaths , only a few of the properties have off road parking many times I have not been able to park in front of my own house, there is nowhere for visitors to park - in bad weather ice and snow you cannot get up the road -there is nowhere to leave your car Upper lane is full Kirklees SDP has a responsibility to cyclists pedestrians , providing protection from Motor vehicles , they should take into account of the needs of the people living there -these visions in the SDP are very hypocritical considering the state of Warburton.	Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.
Respondent 32	Kirklees Council Landscape	p. 10	Agree with these points	Comment noted
		p.12	Some minor changes in wording suggested	Comment noted. Amended accordingly
		p.17	add colour to blister paving for visual impairment	Comment noted. Amended accordingly
		p.18 Para. 1.10	should be 'regardless of visual ability, mobility or age'	Comment noted. Amended accordingly

		p.19 Para. 1.14	Heading should be tactile paving and colour contrast	Comment noted. Amended accordingly
		p.22 Para. 2.3	should be 'safe, attractive and secure cycle parking'	Comment noted. Amended accordingly
		p. 40 Para. 4.1	should include wellbeing and healthy active travel	Comment noted. Amended accordingly
		Para. 4.2	also should be in collaboration with parks officers	Comment noted. Document changed to just say 'council'
		Para. 4.3	minor changes in wording suggested to be more flexible	Comment noted. Amended accordingly
		Para. 4.4	variety of lighting options, choose most appropriate for setting	Comment noted
		Para. 4.5	add 'keeping with character of setting'	Comment noted
		Para. 4.7	Add 'sometimes'	Comment noted. Amended accordingly
		p.41 Para. 4.7	add 'even if the footway is aligned behind the verge' at the end	Comment noted. Amended accordingly

		Para. 4.9 and 4.10	mention trees that already exist at the site	Comment noted. Amended accordingly
		Key Design Driver 16	Changes in wording suggested to add flexibility and reflect what is appropriate to the site	Comment noted. Amended accordingly
		p.42 para 4.12	changes in wording recommended	Comments noted. Paragraph made more concise.

		Para. 4.13	this doesn't apply to all cases	Comment noted. Changed para. To be more suitable for general guidance
		Photo	Planting looks poor and isn't clear what the photo illustrates	Comment noted. Amended photo.
		4.16	Add 'and protected during construction'	Comment noted
		p. 43 Para. 4.18	Who is going to approve this?	Comment noted. Removed 'approved'
		Photo (both on page)	Poor photo – what is this showing?	Comment noted. Amended photos

		Para. 4.21	Lighting and trees should be specified together	Comments noted. Amended accordingly
		p.44 Para. 4.24	to end, add 'biodiversity opportunities, maintenance, managed links to POS'	Comments noted. Amended accordingly
		p.44 Photo	poor photo	Comments noted. Changed to better quality photo of same
		p.45 Para. 4.26	Add 'and how they can work with POS and other landscaped verges/mitigated areas'	Comments noted
		p.46 photo	poor photo	Comments noted. Changed to higher quality photo of same

		Para. 4.34	add 'The location of a tank under the POS should be discussed with the Landscape Architects department at the early stage with the understanding that the Council generally do not adopt tanks under the POS.' to end	Comments noted. Amended accordingly
		p.47 Para. 4.39	add 'or rain gardens in curtilage' to end	Comments noted. Amended accordingly
		photo	poor photo, terrible surface water	Comments noted. Changed to better photo
		p.49 Para. 5.5	This sentence needs finishing	Comments noted. Amended accordingly

		p.50 Para. 5.6	add 'such as street trees or soft landscaping'	Comments noted. Amended accordingly
		Key Design Driver 21	Add 'in conjunction with soft landscaping'	Comments noted. Amended accordingly
		Para. 5.8	Add 'and parking should not dominate the streetscape' to the end	Comments noted. Amended accordingly
		Para. 5.9	Should be 'strong and extensive planting and trees', 'visual amenity'	Comments noted. Amended accordingly
		Key Design Driver 22	Add 'should incorporate some form of soft landscaping or tree planting as standard.' To end	Comments noted. Amended accordingly
		p. 52	add 'bin storage and presentation'	Comments noted. Amended accordingly
		p.53	poor photo	Comments noted

		p.54	photo should be a Kirklees refuse vehicle	Comments noted
		p.55 General	Please make reference to current waste management guidelines	Comments noted



		Key Design Driver 26	Add 'and design out unnecessary manoeuvring procedures' to the end	Comments noted. Amended accordingly
		p.56 Para. 6.7	add 'and be maintained by a private management company' to the end	Comments noted. Amended accordingly
		p.57 Para. 6.9	mention dropped kerbs	Comments noted. Amended accordingly
		Para. 6.11	Turning space reduced to that needed by a private car is not ideal.	Comments noted. Amended accordingly
			Mention - Delivery vehicles are becoming more prevalent with increase in online shopping	Comments noted. Amended to reflect this comment
		p. 58 Para. 6.15	Add 'Soft landscaping should be incorporated so the hard landscape highway surfacing does not dominate. ' to the end	Comments noted. Amended accordingly
		Para. 6.16	Add 'and maintained and managed by a private management company. ' to the end	Comments noted. Amended accordingly
Respondent 15			With regards to the current proposal for site H358 in Emley. According the Kirklees plan a certain requirement of infrastructure is required, the H358 site lacks this infrastructure. The only access to this site is via Warburton Road and Green Acres Close. Warburton Road is a narrow road with no footpaths at either side. Due to the nature of the houses already on Warburton which have is no off road parking, cars are parked along the side of the road, making this a single track lane. It is difficult for cars to pass and delivery vehicles and construction vehicles would	Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.

			<p>cause great disruption. It is already unsafe for the children walking to school as no pavements means that pedestrians have to walk on the road and along with the poor lighting on winter mornings and nights makes this an accident waiting to happen.</p> <p>Emley as a village does not provide much local employment so most residents are commuters. At key times the Traffic is already at a bottleneck through the village without the additional traffic from the new development. Footpaths throughout the village are lacking. The main street of Upper Lane only has footpaths to one side and along with parked cars make Upper Lane almost a single track road.</p> <p>The vision in the Kirklees plan talks of putting pedestrians and cyclists first and incentivising walking and cycling in a secure and pleasant environment, providing protection from motor vehicles, reducing car travel and fuel consumption. In my opinion the plan for site H358 goes against this vision in every aspect.</p>	
Respondent 16			<p>H358</p> <p>This site cannot take more houses. The plan will mean Warburton is incredibly dangerous.</p> <p>It is already dangerous for children to walk down as there is no footpath. I thought new developments had to have suitable footpaths and access?</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>

Respondent 17			<p>H358</p> <p>With regards to Site H358 I feel that the vision of the Kirklees Plan has been lost. The plan talks about safety of pedestrians and cyclists to encourage more people to walk and cycle. The site H358 is accessed from Warburton Road which has no pavements and due to on road parking is at times is a single track, adding the additional traffic from 40 houses potentially 80 cars this is far from a vision of safety. Children have to walk in the road as no pavements are not available. Warburton Road feeds on to Upper Lane, the main street running through Emley which already suffers from congestion at peak times. Upper Lane only has Pavements on one side of the road. Which again is far from providing a safe</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>
			<p>environment for walkers. Due to developments in other local villages where the traffic feeds through Emley the congestion has greatly increased over the last few years.</p> <p>I think the vision set out in the Kirklees plan cannot be obtained by building the development on the H358 site.</p>	

Respondent 16			<p>H358 Emley.</p> <p>Your very own design standards dictate that you will prioritise walkers and cyclists. How can you justify adding potentially 100 new cars into Emley at site h358?</p> <p>There are no footpaths in Warburton? This is your key principle and unacceptable.</p> <p>Children play on the Warburton recreation ground and cars parked make the road single track. This is highly dangerous. They can only walk there in the road.</p> <p>Children walk down Warburton to school or school buses. They take their life in their hands with the current level of traffic. The doubling or trebling of this traffic volume is both unsafe and impractical.</p> <p>Upper lane is gridlocked with the majority of it being single lane due to parked cars. Adding more cars into the village in not a sound plan. Emley is a commuter village and people need to drive to work and shops. 40 or 80 or even 100 more cars will stifle the village and make walking on Warburton too dangerous to consider. It will result in parents driving children up and down Warburton to protect them.</p> <p>This plan does not comply with your very own design standards and should be removed.</p>	<p>Comments noted. Site HS137 (formerly H358) is allocated in the adopted Local Plan which underwent Independent examination and is not part of the Highway Design Guide SPD.</p>
Respondent 28	Kirkburton Parish Council		<p>The comments from Kirkburton Parish Council on the above consultation are as follows:</p>	<p>Comments are noted by the council. The SPD sets out guidance for shared space in line with government endorsed guidance.</p>

			<p>1. The introduction of shared spaces should be avoided as they impact detrimentally on blind, partially sighted and disabled people. Evidence has shown that the incidence of accidents increases following such changes to the highway.</p>	<p>Amendments made to text to emphasis design requirements of visual impaired individuals</p>
			<p>2. The amount of street furniture should be kept to the minimum required, as it causes problems for wheelchair users.</p>	<p>Comment noted. Reference to minimal street furniture is included in the SPD</p>
			<p>3. The Parish Council is disappointed to note that the consultation period has been reduced to 6 weeks on this occasion, when best practice is to allow 12 weeks for the public and bodies such as the Parish Council to respond.</p> <p>I realise that this response is slightly outside of the consultation period, but trust that it will be possible for the Parish Council's comments to be considered before final decisions are taken.</p>	<p>Comments noted. The 6 week consultation period was above the minimum 4 week requirement for SPD consultations and complied with the councils SCI</p>
Respondent 30			<p>Perhaps inevitably the guide appears to focus on urban streets. The feel of the document is very housing estate-y and samey. Considering that a significant amount of the land in Kirklees is rural by nature, should there not be greater consideration of rural highway design and appreciation of the difference between the composite areas of the borough? In the Holme Valley in particular, the landscape characteristics, as identified by the AECOM study, are distinctive. The consultation exercises carried out in connection with the development of the neighbourhood plan has re-affirmed the importance of retaining these features. These include the narrow, steep and twisting roads bounded by dry stone walls. These features are evidently of local importance; they are also part of the attractiveness of the area and contribute to the Kirklees Economy through tourism etc. Hence there is a danger of a contradiction between this and the principals contained in the design guide.</p> <p>The nature of the roads requires attention to speed control measures and sight lines. Greater emphasis of these could be made.</p> <p>Housing estate design should take care not to create areas which lay the ground for conflict between neighbours over parking, waste bins and access etc.</p>	<p>Comments noted</p>

			<p>Repeated reference is made to the concern for pedestrians and cyclist safety. There not one reference to horse riders or bridleways. Given the rural nature of the borough, this is a serious omission.</p> <p>Consideration should also be given to the increased use of country roads as links between settlements to main roads. Some of the developments in rural areas have knock on effects which lead to traffic hot spots away from the immediate vicinity of a development. Attention should be given to this in the guide.</p> <p>Given the urgent imperative to reduce carbon emissions, could this be the opportunity to require developers to construct all pavements, car parking and other hard standing areas from porous materials? Flood mitigation and minimisation of run off is essential. Are there ways of building in other actions to make the use of the private car less attractive and more inconvenient? This is chance for Kirklees to take the lead!</p>	
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Respondent 31	Mirfield Town Council	<p>Dear Sirs</p> <p>Re: Land at Slipper Lane 2018/90801/90802/91005/93622</p> <p>Mirfield Town Council would like to make comments/objections on the above applications, especially regarding highways. We have instructed a highways consultant and the following are findings that the council would like a response to and adhering to before any application is granted.</p> <p>MTC note that the two main areas that are of concern to MTC are also key elements in the SPD - capacity and highway safety.</p> <p>In chronological order working through the document we would like to report the below;</p> <ul style="list-style-type: none"> <li>• Introduction (i)– do the high standards of highway design conform to the Design Manual for Roads and Bridges requirements?</li> <li>• (ii) – Were all the highway design considerations taken into account when designing the proposed highway mitigation measures at the A62 Leeds Road/Sunny Bank Road signalised Junction? Particularly in reference to highway safety and the feasibility via a Stage 1 Road</li> </ul>	Comments noted
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			<p>Safety Audit.</p> <ul style="list-style-type: none"> <li>• (iii) – In retrospect, with future highway modifications be required to accommodate the resident parking to the east of the junction off the north kerb line. Sufficient feasibility work could have prevented any unnecessary delays, costs, etc. in this instance;</li> <li>• (iv) With regards to addressing congestion MTC cannot understand how the 2013 through put traffic counts undertaken in the WSP TS (2014) were less than the 2006 counts ?? (Not an issue in SPD more in TS). The TS showed the A62 Leeds Road/Sunny Bank junction as oversaturated (132%) so the storage of motorised traffic, that the SPD encourages has not been addressed;</li> <li>• (v) accommodate all movements – see above.</li> <li>• (vii) Key Design Drivers – was a Design and Access Statement submitted for this application addressing any divergence from the Key Drivers?</li> <li>• (ix) Collaborative approach to highway design. Was this applied to the proposed A62 Leeds Road / Sunny Bank Road mitigation measures? Removal of the right turn lane (northbound) and reassignment of the westbound lanes?</li> </ul> <p>Highway Design Principles</p> <ul style="list-style-type: none"> <li>• Priority No.1 – Ensuring safety. MTC don't recall seeing a Road Safety Audit for the proposed highway mitigation measures at the A62 Leeds Road/Sunny Bank Road junction;</li> <li>• Priority No.7 – Road Safety Audit particularly to identify any issues on eastern arm with on street parking, emergency vehicles etc.;</li> </ul> <p>Scheme Design</p>	
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			<ul style="list-style-type: none"><li>• <i>“Anticipate the movement patterns of pedestrians, cyclists and vehicles and decide where this can be most effectively located.”</i> – MTC are not sure the reassignment of the westbound</li></ul>	
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			<p>lanes and the removal of the right turn (northbound) anticipated movements of vehicles, etc.</p> <ul style="list-style-type: none"> <li>• <i>“Ensure there is adequate parking for cars.....”</i> – Has an assessment been undertaken to ensure the area to the rear of the main residential plot on the north east corner of the junction has a sufficient level of parking to prevent on street parking?</li> <li>• <i>“Provide easy access to dwellings for emergency vehicles and refuse collection”</i> – How are the properties on the east side of the junction (A62) serviced? From the A62 or from the rear? Is easy access available?</li> </ul> <p>Prioritising Pedestrians</p> <ul style="list-style-type: none"> <li>• 1.1 – Has the parking area to the rear of the large residential plot been assessed for safety, pedestrian accessibility, it is illuminated etc.? It is a shared space (not sure if it is private or public land);</li> <li>• Ped facilities and movements has been considered as part of the highway mitigation measures at the A62 Leeds Road/Sunny Bank Road junction;</li> <li>• Safety and Security – Is pedestrian guardrail proposed at the junction as part of the safety measures. This would have been identified as part of Road Safety Audit as the RSA assessed all potential users, not just vehicles. Although the SPD states barriers can be hazard what other methods can be used to prevent children from running out into the traffic? Cycling Infrastructure</li> <li>• Cyclists have been included within the A62 Leeds Road/Sunny Bank Road junction design works, however MTC are not sure if novice cyclist would feel comfortable using the cycle reservoirs – are alternative routes available for novices ? Again a Road Safety Audit would have confirmed.</li> <li>• Has a suitable cycle signing strategy been agreed with KC and does it work without cluttering the junction?</li> </ul> <p>Streets</p>	
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			<ul style="list-style-type: none"> <li>• (3.1) This confirms that this SPD relates to a 'Manual for Streets' approach only and does not apply to the proposed larger highway infrastructure projects on main roads (i.e. A62). However, the principles should still apply to larger schemes. There is no mention of the Design Manual for Roads and Bridges design guide (DMRB) that relates to higher classification roads, trunk roads, etc.</li> <li>• (3.7) The document identifies that the scheme layout will be based on design speeds that in practice form part of the Stage 1 Road Safety Audit. Finally, it gets a mention but was one undertaken for the works at the A62 Leeds Road/Sunny Bank Road junction?</li> <li>• (3.8) KC encourage highway works to be designed to an adoptable standard that includes conformance to the DMRB. MTC are not sure the proposed mitigation works conform to the DMRB requirements – We would question the running lane widths, is the crossing pedestrian island (at left lane off southbound) of a sufficient width to accommodate a person &amp; pushchair or cycle, the left turn heading northbound looks tight for large vehicles, right turn lane southbound looks too narrow, etc.;</li> <li>• (3.22) DMRB mentioned at this point for industrial/commercial traffic. HGV/cyclist interaction is also mentioned but we are unsure if this was looked at as part of the RSA. Design issues above still apply;</li> <li>• (3.26) Carriageway widths – Do the lane widths conform to DMRB, not sure if vehicle speeds through the junction were considered?</li> <li>• (3.28) Was swept path analysis undertaken as part of the highway mitigation measures at the A62 Leeds Road/Sunny Bank Road junction? Nothing mentioned in the TS.</li> <li>• (3.36) Junction Radii need to conform the Table 5 and DMRB. The proposed radii look like they are not smooth curves and intermittent, however this could be the poor base/topo.</li> </ul>	
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			<ul style="list-style-type: none"><li>• (3.39) There no mention of speed surveys or speed assessments in the 2014 TS. Have these been considered as part of the A62 Leeds Road/Sunny Bank Road junction mitigation design.</li></ul>	
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			<ul style="list-style-type: none"> <li>• (3.48) We are assuming that as part of the detailed design drawings of the proposed A62 Leeds Road/Sunny Bank Road junction mitigation measures that the carriageway cross falls conform to the SPD and DMRB requirements;</li> <li>• If any vehicles decide they do not want to take the detour to join Sunny Bank Road (northbound) they can still physically make the right turn, albeit illegal. The extended pavement on the north east corner does not prevent vehicles from making the right turn;</li> </ul> <p>Utilities</p> <ul style="list-style-type: none"> <li>• As additional kerbing, ducting, pavement construction, signing etc. are required we would assume that no services are affected or they have been slewed/diverted as agreed with the statutory undertakers and KC. Have access covers been provided for maintenance;</li> </ul> <p>Lighting</p> <ul style="list-style-type: none"> <li>• Has a lighting assessment been undertaken for the proposed scheme to ensure the luminance values are not affected?</li> </ul> <p>Site Drainage</p> <ul style="list-style-type: none"> <li>• Has a drainage assessment been undertaken to ensure the new measures do not cause localised flooding or ponding and there is sufficient discharge points for the surface water runoff. This will need to be completed as an adoptable system.</li> </ul> <p>Parking</p> <ul style="list-style-type: none"> <li>• Has an assessment been undertaken to ensure the dwellings located to the north east of the A62 Leeds Road/Sunny Bank Road junction have sufficient parking to the rear of the main residential unit on the A62. If not the residents will park on the A62</li> </ul>	
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			<p>eastbound arm that could result in highway safety issues, congestion and a 'bottle neck' situation. Does the level of parking conform to KC Local Plan standards (5.2)</p>	
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