



## **CALDERDALE LOCAL PLAN**

**LP1567 LAND ADJACENT TO EXLEY LANE, ELLAND**

## **LOCAL PLAN REPRESENTATION**

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## LP1567 LAND ADJACENT TO EXLEY LANE, ELLAND

### Document Status – Final

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## **1 LOCAL PLAN REPRESENTATION**

### **1.1 Introduction**

1.1.1 Northern Transport Planning has been appointed by residents of Exley Lane to provide advice on the transport implications of the allocation of land adjacent to Exley Lane, north of Elland, Calderdale (Site Reference: LP1567) for residential development.

1.1.2 This report has been prepared to provide transport-related evidence to assist the planning process.

### **1.2 Site and Location**

1.2.1 The site is located approximately 1.0km north of the centre of Elland in Calderdale. The site is split into two parts – the ‘Northern Site’ and the ‘Southern Site’ – bisected by Exley Lane, as shown on the plan provided as **Appendix A**.

1.2.2 Access to the site is available via Exley Lane and Plains Lane. We understand that to the north of the site Exley Lane is prohibited for use by traffic except for local access, i.e. all traffic associated with the site will travel to/from the south.

1.2.3 The site has been identified as having the potential to accommodate 450 dwellings.

### **1.3 National Planning Policy Framework**

1.3.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England under a framework within which local people and their accountable councils can produce their own distinctive Local Plans that reflect the needs and priorities of their communities.

1.3.2 Paragraph 102 of the NPPF states:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*a) the potential impacts of development on transport networks can be addressed;*

*b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

*c) opportunities to promote walking, cycling and public transport use are identified and pursued;*

*d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*

*e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

1.3.3 A residential development of 450 dwellings would generate approximately 3,600 additional trips per day by all modes of transport, and would generate approximately 2,300 vehicle movements per day. A development of this major scale clearly falls within the category of a development that would “generate significant amounts of movement” (NPPF paragraph 111). A detailed Transport Assessment is therefore required to analyse the impacts arising from development, propose mitigation measures and inform the plan-making process. At this stage, however, such a report has not been provided by the promoters of the site for consideration by local people and other key stakeholders.

## **1.4 Access on Foot**

1.4.1 Access to and from the site on foot will typically be via Exley Lane.

1.4.2 The main pedestrian route for the Northern Site will be from Exley Lane then via what is currently a farm track passing over a railway. This raises a number of highway safety issues which have not been addressed by the promoters of the site.

- 1.4.3 First, intervisibility between traffic and pedestrians is restricted at this location due to the 90 degree bend in the road approximately 35m to the west. There is no footway, only a narrow verge on the north side of Exley Lane, so pedestrians are required to cross to/from the south at this potentially unsafe location.
- 1.4.4 Second, and this is applicable to both the Northern and Southern sites, whilst it is normally expected that footways are provided on both sides of a road which is frequently used by pedestrians, matters are made even worse by the fact that the single footway on the west/south side of Exley Lane has a width of only 1.5m to 1.6m – this is not an appropriate width for use by the significant number of pedestrians which would be generated by a development of 450 dwellings. Manual for Streets 1 (MfS1) states at paragraph 6.3.22:
- “There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2 m. Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops.*
- 1.4.5 The promoters of the Exley Lane site have, in their ‘Vision Document’ (January 2018), suggested that the site is in a “highly accessible location”. They present a plan (on page 9) which suggests that a number of bus stops and a public house are within a 400m walk from the site, that a range of shops and facilities and the potential new Elland Railway Station are within an 800m walk from the site, and that virtually the whole of Elland lies within a 1,200m walk from the site. The plan is, of course, deceptive because people do not walk ‘as the crow flies’.
- 1.4.6 It is recognised that for public transport to be an attractive alternative mode of transport to the private car it needs to be easily accessible on foot. Ideally, bus users should not have to walk more than 400m to their nearest bus stop or 800m to their nearest railway station.
- 1.4.7 The Institute of Highways & Transportation guidance ‘Guidelines for Providing for Journeys on Foot (refer below) provides the following guidance:
- Maximum desirable distance to nearest bus stop = 400m.
  - Maximum desirable distance to Town Centre = 800m.
  - Maximum desirable distance to food shopping = 1,000m.

1.4.8 The walking distance between the centre of the Northern Site (i.e. not the furthest distance, which would be at its northern end) and the nearest bus stops on A6025 Halifax Road, taking the shortest route via the unattractive subway, has been measured at 675m, representing a 9 minute walk time. The Barge and Barrel public house, this being the nearest 'facility' to the site, is a 700m walk.

1.4.9 There are currently no railway stations in Elland, but we understand there are plans for a new station to be located west of Lowfields Way. If this station does eventually come to fruition, it will be a 1.7km walk from the centre of the Northern Site, representing a 21 minute walk time – this is too far for most people to walk, although it is accepted that it would be accessible as part of a combined cycle/public transport trip.

1.4.10 Other examples of accurate walking distances/times to facilities are:

- Nearest supermarket – 1,200m/15 minute walk.
- Nearest school – 1,400m/18 minutes walk.
- Nearest pharmacy – 1,300m/16 minutes walk.
- To (approximate centre of) Elland Town Centre – 1,800m/23 minutes walk.

## **1.5 Access by Cycle**

1.5.1 National Cycle Route 66 follows the alignment of the Calder and Hebble Navigation which bisects the site and Elland Town Centre – this provides an attractive leisure cycling route. Other than this, there are no obvious facilities to encourage cycling as a mode of transport in the vicinity of the site or within Elland. Furthermore, the topography of roads surrounding the site is not conducive to cycling.

## **1.6 Access by Public Transport**

1.6.1 As stated previously, the nearest bus stops are located a 675m walk from the centre of the Northern Site, a distance which is almost twice the 'desirable maximum'. From here the bus services No.E4 and No.537 are available.

1.6.2 The No.E4 provides an hourly service daytime Monday to Saturday between Elland and Barkisland, with no services in the evenings or on Sundays.

1.6.3 The No.537 provides an hourly service daytime and evening Monday to Saturday between Halifax and Huddersfield via Elland, with two-hourly services on Sunday.

1.6.4 No train services are currently available from the site. As stated previously the planned Elland Railway Station, even if it comes to fruition, will not be within convenient walking distance of the site.

## 1.7 Access by Vehicles

1.7.1 The promoters of the site have presented vehicular access arrangements as shown on the plan provided as **Appendix B**.

1.7.2 We understand that the Northern Site eastern access via Plains Lane will be used as an 'emergency access' only due to the substandard width of Plains Lane and associated levels of on-street parking. It is apparent, therefore, that all traffic will access both the Northern Site and the Southern Site via Exley Lane south (due to the prohibition of traffic north of the site on Exley Lane).

1.7.3 From a consideration of the submitted layouts, it is possible that suitable site access arrangements for the Southern Site are deliverable, although this has not been properly demonstrated by the promoters of the site, either in terms of satisfactory design or operational analysis.

1.7.4 It is obvious, however, that the design of the Northern Site access junction with Exley Lane is substandard.

1.7.5 The existing layout of Exley Lane south of the proposed Northern Site access is shown on the Google Street View image provided as **Appendix C**. It can be seen that cars associated with the adjacent dwellings park on-street, typically parking partially on the carriageway and partially on the margin outside the dwellings.

1.7.6 The proposed Northern Site access junction with Exley Lane has been reproduced on the drawing provided as **Appendix D**. The drawing has also identified the cars parked on the Google Street View image. The drawing raises a number of highway safety issues which have not been addressed by the promoters of the site.

- 1.7.7 First, it can be seen that the 2.4m x 43m visibility splay to the left from the site access passes through the parked cars, i.e. the splay is available in theory but not in practice. If the cars chose to park completely on the carriageway, visibility to the left would be further compromised.
- 1.7.8 Second, the promoters of the site have accepted that a carriageway width of 5.5m is the appropriate dimension, as this is the width they have proposed for the internal highway network at the site access – at this width two Heavy Goods Vehicles (HGVs) can pass each other. However, it can be seen that the carriageway width of Exley Lane at the site access is less than 5.2m, and this is on a bend where local widening would normally be provided. The implications of this is that two HGVs certainly cannot pass each other; it is likely that an HGV cannot pass a large van; and it is possible that two large vans would not be able to pass each other. As well as being of relevance during the operation of the site access post-development, the implications are particularly important during the construction phase. If Exley Lane was widened at this location to enable the satisfactory two-way movement of all vehicles, visibility from the site access would be restricted further. The fact is, the suitability of the Northern Site access has not been demonstrated by the site promoter, either in terms of satisfactory design or operational analysis.
- 1.7.9 Third, it can be seen that due to on-street parking south of the Northern Site access, the Exley Lane carriageway width is restricted to either 4.7m or 3.0m depending on whether cars are parked on one side or both sides of the road. MfS1 provides guidance on different carriageway widths and what each can readily accommodate as follows:
- 2.75m – suitable for single lane working only (passing places required).
  - 4.1m – two cars can pass each other.
  - 4.8m – a car can pass an HGV.
  - 5.5m – two HGVs can pass each other.
- 1.7.10 It is apparent, therefore, that the section of Exley Road south of the proposed Northern Site access currently presents a ‘bottleneck’, the traffic effect of which has not been considered by the site promoter, but would be clearly revealed during the construction phase and post-development. Potential mitigation measures are not immediately apparent. Similar issues, we understand, have led to the site promoter downgrading the use of Plains Lane to an ‘emergency access’ route.

- 1.7.11 Fourth, the Northern Site access design includes footway provision connecting with Exley Lane which will encourage its use by pedestrians, however there is no footway on the east side of Exley Lane so pedestrians are required to cross to the west side of the main road. Unfortunately, at this location forward visibility along the Exley Lane is poor due its horizontal alignment. Despite this, the highway safety implications have not been addressed by the site promoter.
- 1.7.12 Dealing finally with off-site traffic issues, it appears that the site promoter has given this no consideration. Our site visit was undertaken during a COVID-19 lockdown period, and during the daytime, so the observed level of traffic and associated queues and delays were far from 'typical' network peak conditions. Notwithstanding this, we know that all generated traffic will use the Exley Lane junction with A6025 Park Road and that the potential development of 450 dwellings will generate around 230 vehicle movements per hour during both the A.M. and P.M. peak periods, i.e. around 4 vehicles per minute or one vehicle movement every 15 seconds.
- 1.7.13 It is apparent that A6025 Park Road is a relatively heavily trafficked local distributor road and we have been advised by local residents that its junction with Exley Lane is typically operating at capacity during the A.M. and P.M. peak periods. It is clear that the effect of the additional traffic generated by 450 dwellings on the operation of this junction needs to be properly assessed before any decision can be made on the local plan allocation.

## **1.8 Conclusion**

- 1.8.1 Paragraph 108 of the NPPF states:
- “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
  - b) safe and suitable access to the site can be achieved for all users; and*
  - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

1.8.2 The following comments are relevant in relation to the above:

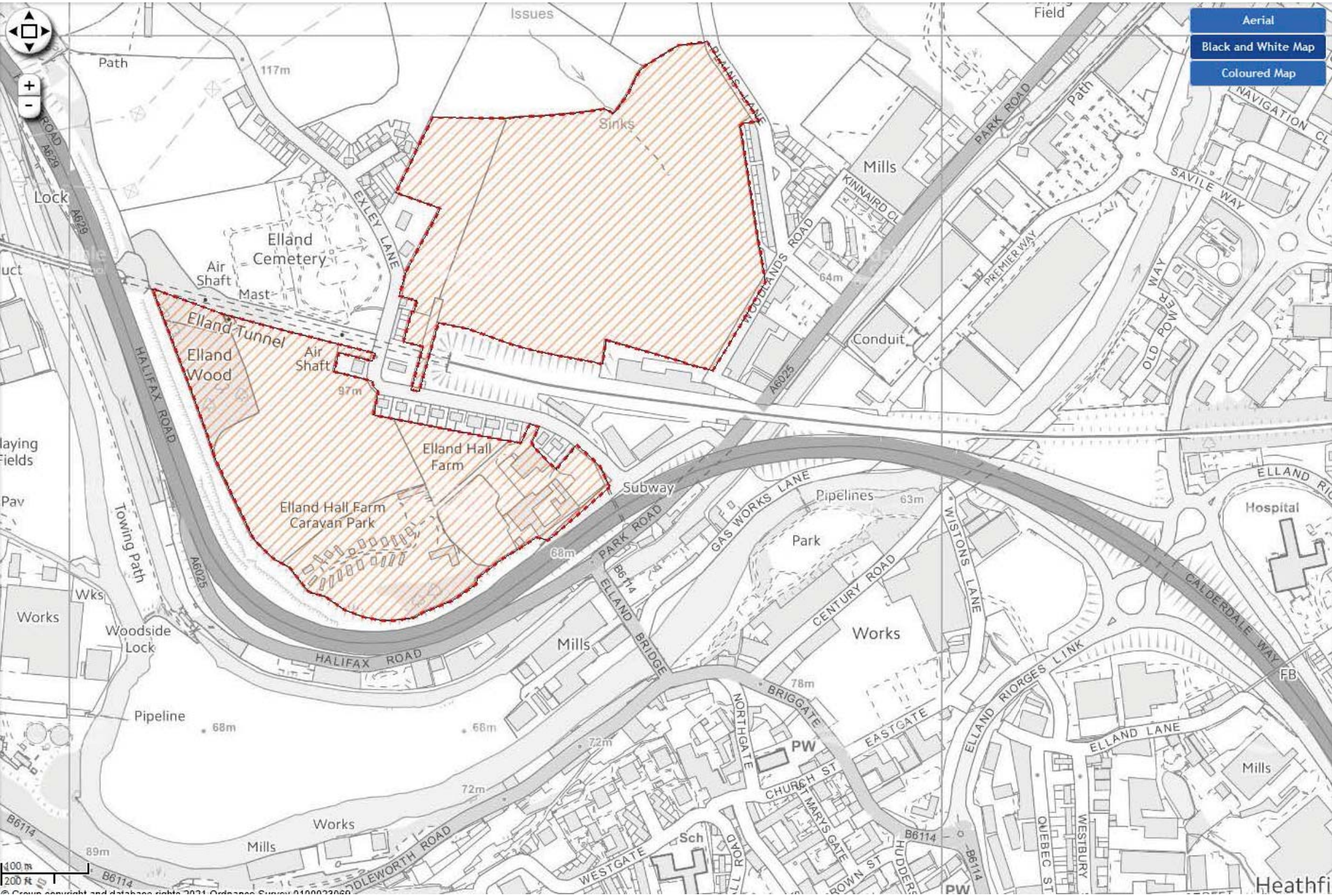
- Opportunities for sustainable transport – as has been demonstrated within this representation, the site is not readily accessible using sustainable modes of transport.
- Safe and suitable access – safe and suitable access by all modes of transport has not been demonstrated by the promoter of the site.
- Impact of development – this representation demonstrates that the impact of traffic generated by the potential development has not been satisfactorily assessed to enable a decision on allocation of the site for residential development to be made.



# APPENDIX A



- Aerial
- Black and White Map
- Coloured Map

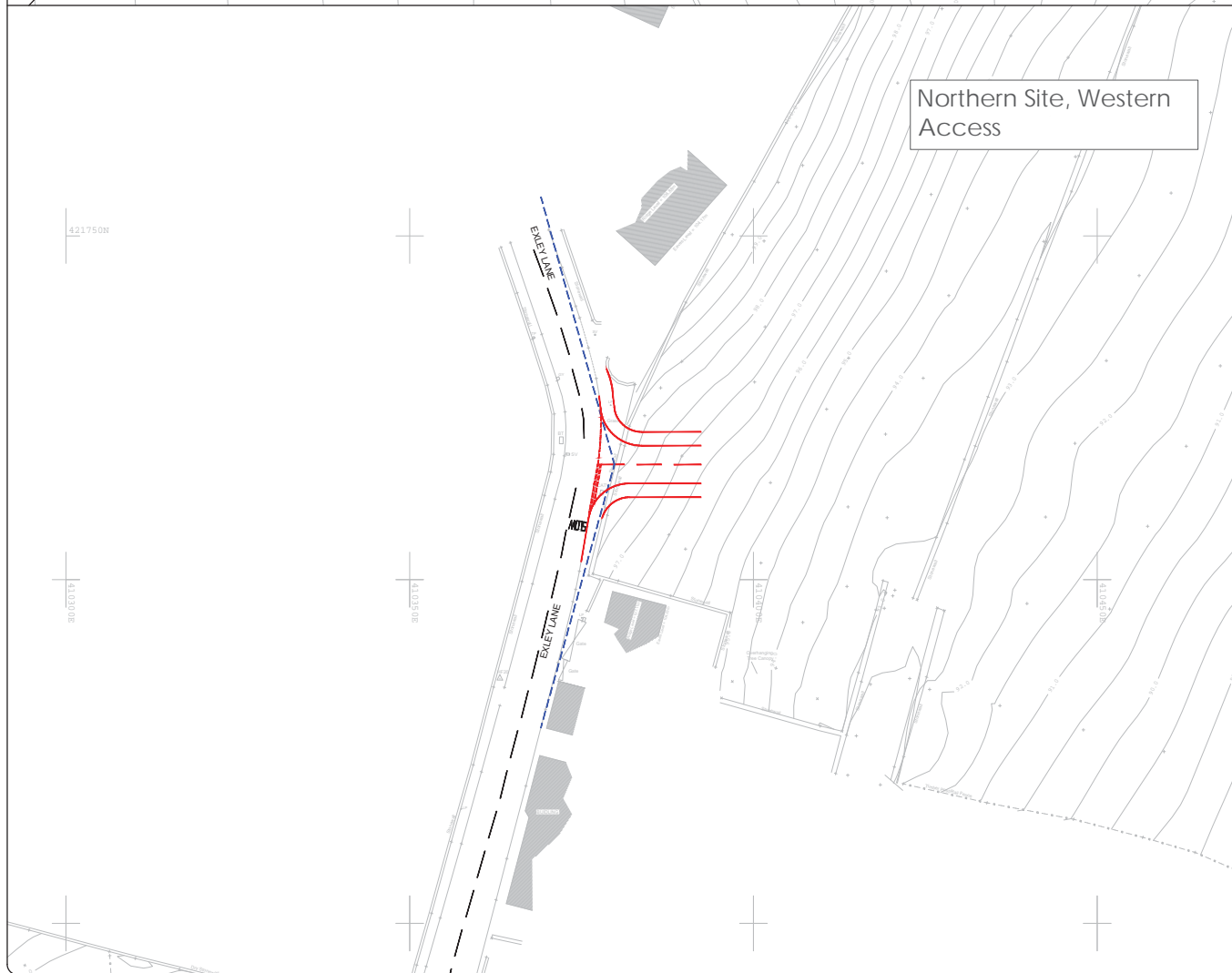
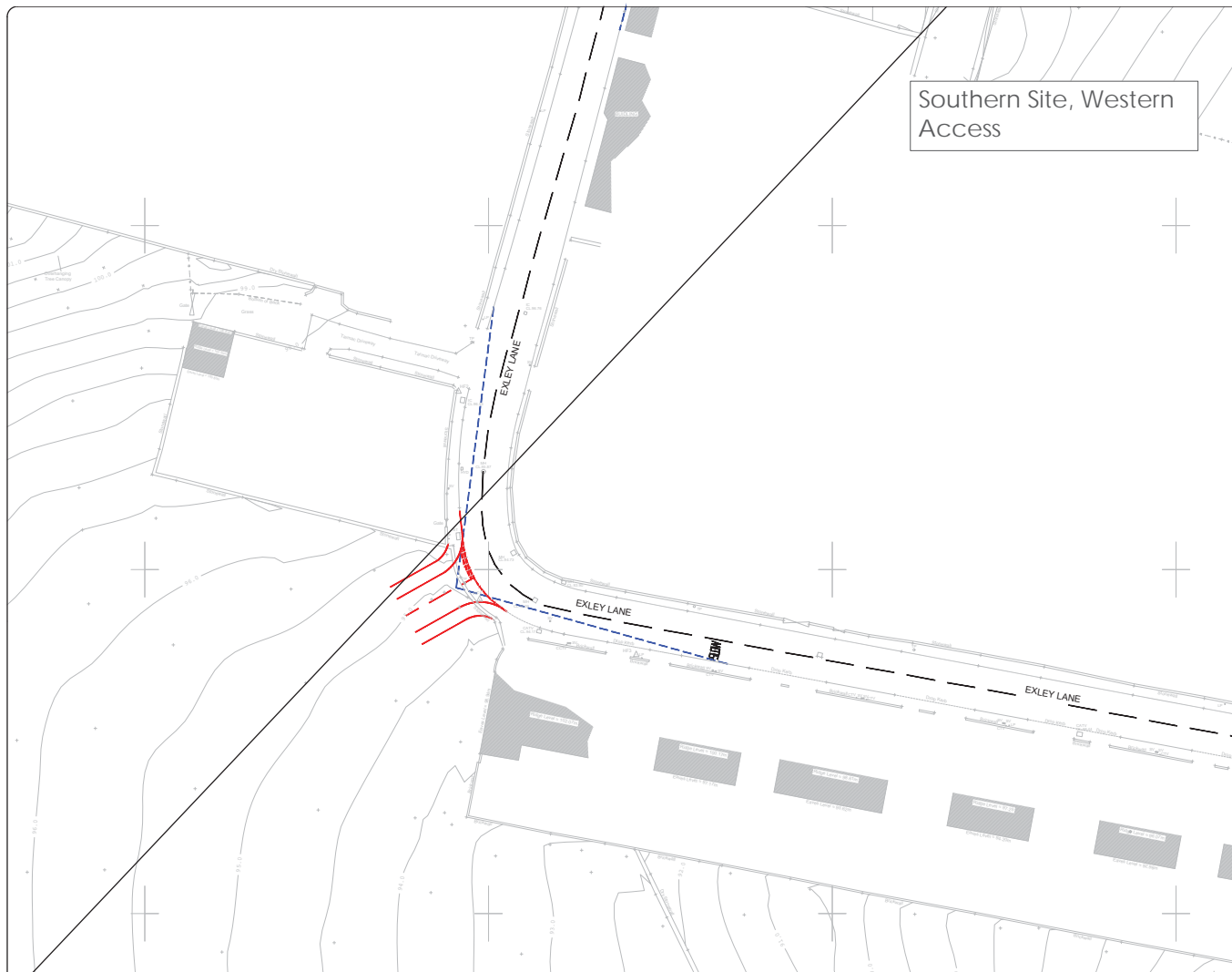


100m  
200ft  
© Crown copyright and database rights 2011 Ordnance Survey 100022620

Heathfi



# APPENDIX B



- Notes:**
1. This drawing is subject to copyright and is not to be reproduced in part or whole without approval.
  2. Do not scale this drawing - check all dimensions on site.
- Key**
- Proposed Access Provision
  - - - Visibility Splays Provided to Accord with Manual for Streets and 30mph Speed Limit

Rev:	Date:	Status/Amendments:	By:
A	27.07.20	TOPO ADDED AS BASE DRAWING	K.G
-	30.06.20	INITIAL ISSUE	K.G

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Client:  
**AVANT HOMES**

Project:  
**EXLEY LANE, ELLAND**

Drawing Title:  
**PROPOSED SITE ACCESS OPTIONS**

Drawn By:	Checked By:	Approved By:
KG	RAM	RAM
Scale:	Paper Size:	Date Created:
1:500	A1	30.06.20
Drawing Number:	Drawing Revision:	
18029.IN.04	A	

# APPENDIX C

2 Exley Ln

Elland, England

Google

Street View - Oct 2014



Currently shown: Oct 2014

2009

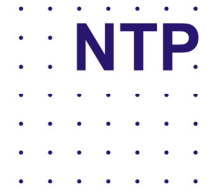
2014

EXLEY

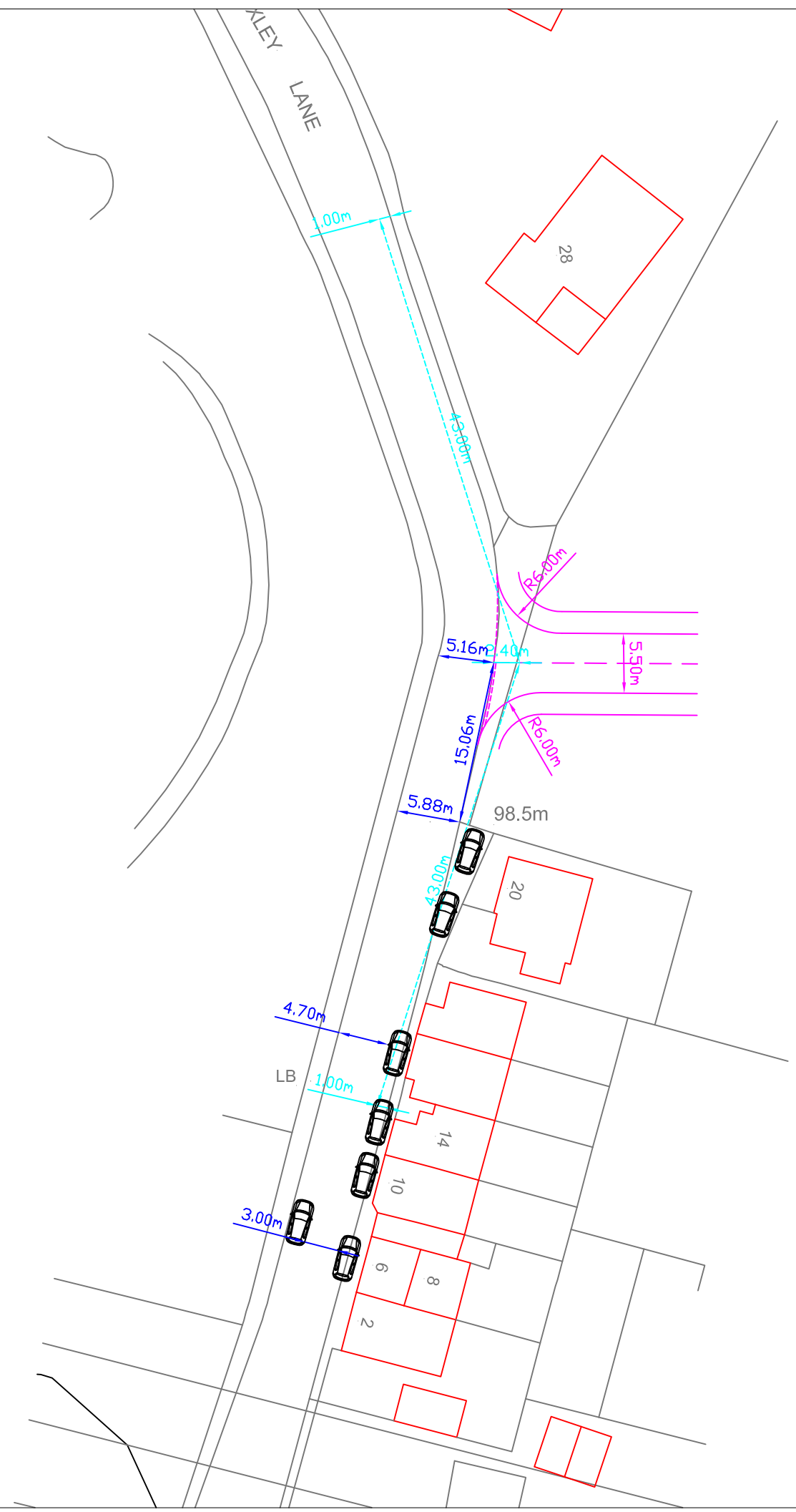


Google

Image capture: Oct 2014 © 2021 Google - United Kingdom Terms Report a problem



# APPENDIX D



Notes

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Client  
EXLEY LANE RESIDENTS

Project  
EXLEY LANE

Title  
NORTHERN SITE ACCESS

Scale 1:500	Sheet A3	Drawn JV	Chkd AK
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Drawing No. NTP21006-001      Rev  
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