

**IN THE PUBLIC INQUIRY INTO THE COMPULSORY PURCHASE ORDER
FOR THE PROPOSED A650 HARD INGS ROAD IMPROVEMENT SCHEME
CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL**

OBJECTIONS

BY

MR TARIQ GHAFOR

Subject Matter

**CPO for Proposed A650 Hard Ings Road Improvement Scheme.
Land and Buildings Known As Hard Ings Motor Company.
Proprietor: Mr Tariq Ghafoor**

DATE 1ST DECEMBER 2017

1. INTRODUCTION

1.1 Formal Details

Name : Mr Tariq Ghafoor

Status : Proprietor : Land and Buildings Known As Hard Ings Motor Company

Address : Hard Ings Road, Keighley, West Yorkshire, BD21 3NB

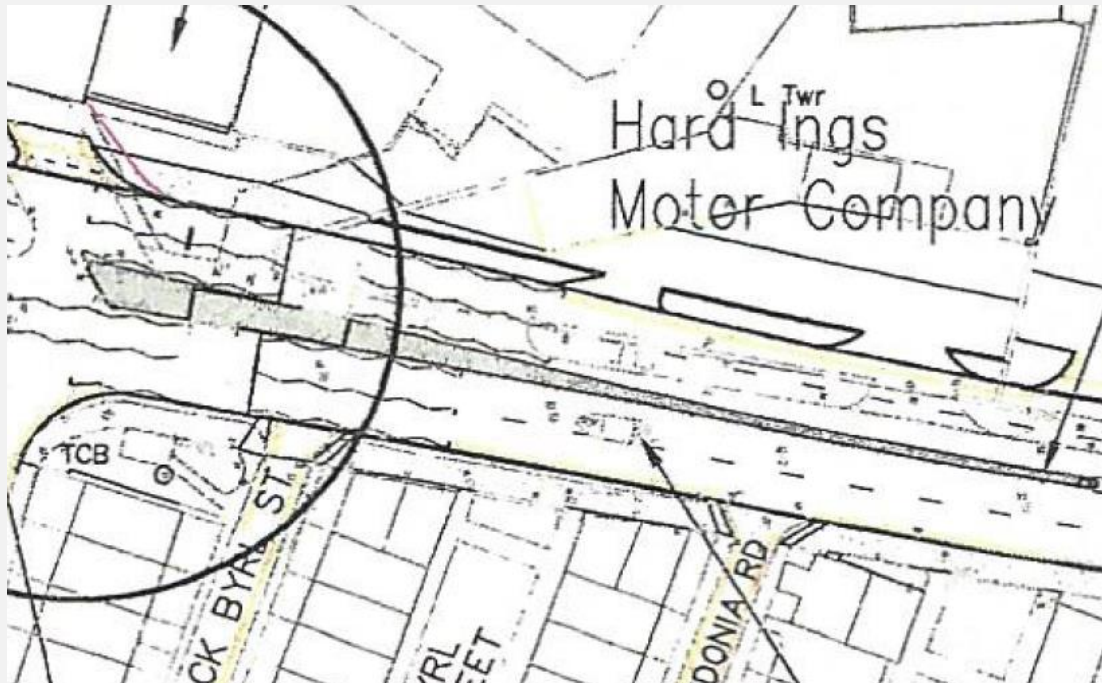
1.2 Synopsis

In this Public Inquiry, I, Mr Tariq Ghafoor, am objecting to a Compulsory Purchase Order (CPO) served by the City of Bradford Metropolitan District CBMDC (CBMDC) in connection with the proposed A650 Hard Ings Road Improvement Scheme. This CPO affects redevelopment land in my proprietorship fronting Hard Ings Road and known as "Hard Ings Motor Company".

2 THE BACKGROUND TO THE CLAIM

2.1 The Proposed Road Scheme

2.1.1 The proposed A650 Hard Ings Road Improvement Scheme has been promoted by the City of Bradford Metropolitan District (CBMDC). The following extract from A650 Hard Ings Road Improvement Scheme Engineering Feature Plan 3 prepared by CBMDC shows the effect of the scheme on the site.



2.2 Background to my Objections

2.2.1 I am the proprietor of the land entitled "Hard Ings Motor Company" (the site) fronting the A650 Hard Ings Road which was formerly a petrol filling station. I am proposing to establish a financial return from the redevelopment of this brown-field site.

2.2.2 The site currently has frontage and unrestricted vehicular and pedestrian access to the existing A650 Hard Ings Road which is a single carriageway and has a number of other similar direct vehicular accesses to commercial and retail plots.

2.2.3 Part of the site is the subject of a CPO for the A650 Hard Ings Road Improvement Scheme as illustrated above. I understand that the road will be widened to provide a dual 2 lane carriageway and some of the land within the site will be required for the new highway. The scheme makes provision for a left turn vehicular access into the site and for a left turn vehicular exit from the site onto the proposed eastbound carriageway of Hard Ings Road. Following my representations and objections, the CBMDC has recently agreed to amend the proposals to make provision for right turning vehicular access into the site from the proposed westbound carriageway. However, the CBMDC have rejected my request for the provision of a facility for vehicular right turns out of the site onto the proposed westbound carriageway.

2.2.4 The CPO will affect the layout of the site including vehicular access, circulating traffic, parking facilities, servicing of buildings and the vehicular exit. Buildings currently on the site will have to be demolished and new buildings constructed at a location suitable for the revised layout of the site and the associated vehicular movements. The CBMDC have not offered any compensation for the costs of these and other associated works.

2.2.5 I am in the early stages of realising a financial return from the redevelopment of the site and I do not wish to compromise the commercial value and viability of this investment.

2.2.6 I have over twenty years practical driving experience of the road network and traffic movements in this area and use it daily at both peak and off-peak times. I am very sceptical of the effect of the scheme on the traffic delays and congestion currently experienced on the highway network particularly in peak periods.

2.2.7 For the above reasons, I am objecting to the proposed A650 Hard Ings Road Improvement Scheme and the associated CPO.

3 THE OBJECTIONS

3.1 Objection No.1 - Effect of the highway improvement scheme proposals on the site

3.1.1 In my view, the loss of land from the site will have a significant effect on the financial value of this brown-field site and any returns arising from its redevelopment. The site is small and any reduction in area will severely restrict the redevelopment potential and the options available to me to maximise the returns from my investment. I have already sought advice concerning the financial value of the effects of the CPO on the reduction in potential returns from my investment and am not satisfied with the level of compensation that has been offered by the CBMDC.

3.1.2 The CBMDC has advised me that, as a result of the proposed highway scheme, part of the site will be compulsorily purchased for the construction of the new highway and footpath. I have also been advised by the CBMDC that the CPO will result in space restrictions within the site. The current vehicular access, vehicle circulation and parking arrangements, servicing of buildings and the layout and location of buildings on the site will be affected by the CPO. CBMDC have advised with several proposed site layout plan options, that these restrictions will necessitate a complete re-design of the layout of the site which will require the reconstruction of the access road, circulating area, parking areas, vehicle access for the servicing of buildings and the exit road.

3.1.3 In addition to the above vehicular restrictions, CBMDC have advised with several proposed site layout plan options, that the existing buildings on the site will have to be demolished and new buildings constructed at a location within the site suitable for the new road layout and parking arrangement. New supplies for the servicing of these new buildings will have to be provided as well as new foul and surface water drainage.

3.1.4 The retaining walls north and eastbound of the site will be affected by these reconstruction works and these walls will have to be removed and reinstated with suitable new retaining walls to accommodate the proposed new site buildings.

3.1.5 The existing surface water drainage system will have to be re-designed to suit the new layout and a new system will have to be constructed.

3.1.6 Existing Statutory Undertaker's plant may be required to be diverted.

3.1.7 New Statutory Undertaker's plant will be required to be installed.

3.1.8 Planning permission, building regulations approval and other legal procedures will be required. There will be costs associated with these requirements.

3.1.9 There may be unforeseen additional costs associated with these reconstruction works.

3.1.10 It is my view that the CBMDC should offer full compensation for the cost of the above re-design and reconstruction works which are required as a direct result of this CPO.

3.2 Objection No.2 - Traffic Restrictions To and From the Site

3.2.1 As stated above, the site currently has frontage to the existing A650 Hard Ings Road which is a single carriageway and has a number of direct vehicular accesses to commercial and retail plots. There is currently unrestricted vehicular access to and from the site.

3.2.2 Part of the site is the subject of a Compulsory Purchase Order for the A650 Hard Ings Road Improvement Scheme as illustrated in paragraph 2.1,1 above. I have not been provided with any cross sections through the proposed highway improvement scheme so have assumed that the road will be widened to provide a dual 2 lane carriageway with two traffic lanes of 3.65 metres width in each direction, a kerbed central reservation of varying width and no hard strips. I have assumed that, in the vicinity of the site, the central reservation will be widened to provide a right turn lane into the site.

3.2.3 The CBMDC have rejected my request for the provision of a facility for a right turning vehicular exit from the site onto the proposed westbound carriageway.

3.2.4 I am aware that the viability of some retail outlets is dependent upon passing trade. This is particularly relevant for fast food and retail businesses. Access restrictions would have a significant effect on the potential returns from my investment in this site. I have therefore welcomed the recent decision to provide a dedicated right turn lane into the site from the westbound carriageway of Hard Ings Road. However, the restricted left turn only exit from the site remains of concern to me. It is my view that this restriction is not currently in force and, as a direct result of the CPO, enforcement of a left turn only exit will have a detrimental effect on the potential financial returns from the re-development this brown-field site.

3.2.5 I have noted that the dedicated right turn entry lane from the westbound carriageway of the proposed A650 Hard Ings Road Improvement Scheme into the site now offered will necessitate the widening of the central reservation across the frontage to the site. I am advised that this facility could also be utilised for the provision of a right turn from the site. I am not anticipating a high number of right turning vehicles leaving the site when it has been redeveloped but have been advised that, in order to wait safely in the central reservation for a gap in the traffic using the westbound carriageway, these vehicles will require a refuge wide enough for the vehicle to be clear of both the eastbound offside lane of

traffic and the westbound offside lane of traffic. This may require a slightly wider central reservation so that the facility would not be detrimental to road safety. It would restore all traffic movements currently available at the site.

3.3 Objection No.3- Increasing the Capacity of Hard Ings Road

3.3.1 I object to the principle of the A650 Hard Ings Road Improvement Scheme which I believe provides no benefit to the peak period congestion in this area. It is my understanding that the existing link road between the Bradford Road Roundabout and the Beechcliffe Roundabout has adequate capacity and that the traffic entries onto these roundabouts are the cause of congestion in this area.

3.3.2 Following the submission of my objections to the scheme and my request for additional information, I have now received the following response from CBMDC with respect to traffic flows along Hard Ings Road.

The average two way traffic flows for the length of Hard Ings Road is 2771 vehicles per hour in the morning peak (08:00-09:00) and 2829 vehicles per hour in the evening peak (17:00-18:00). This is based on data acquired from an Automatic Traffic Count (ATC) located on Hard Ings Road and manual traffic counts undertaken to build the traffic model. More recent traffic count surveys have also been conducted on three consecutive weekdays (13th to 15th March 2017), and the results of this survey also confirm the above mentioned average two-way traffic flows.

In accordance with the Design Manual for Roads and Bridges (DMRB) TA 79/99, the capacity of a two lane 9.0m wide UAP3 road type is 1530 vehicles per hour one-way. This equates to a capacity of 550 vehicles per hour in two-way flows. Therefore, at present the capacity of the existing road layout is inadequate at peak hours.

Traffic modelling results are included in the Gateway 1 report, available on the CBMDCs website on the following link within the Compulsory Purchase Order and Side Road Order, Supporting Documents section. Other link options that were considered are included in Appendix 12 of the Gateway 1 report.

3.3.3 My initial view is that this data does not appear to me to demonstrate the requirement for this dual carriageway link road.

3.3.4 The CBMDC has stated that the average evening peak period two way flow is 2829 vehicles per hour. A 50/50 split in traffic equates to 1415 vehicles per hour in each direction but this traffic flow does not take account of any tidal traffic flows at this location.

3.3.5 I do not agree with the CBMDC assessment of the existing road type UPA3 as I am advised that the existing road is a 7.3 metres wide UAP2.

3.3.6 I am also advised that 1539 vehicles per hour one-way does not equate to a capacity of 550 vehicles per hour in two-way flow as stated in the CBMDC reply.

3.3.7 I am also advised that, in Table 2 of TA79/99, the capacity of a 7.3 metres wide UAP2 road type is 1470 vehicles per hour one way (60/40 split). I have therefore concluded that the existing road has sufficient capacity for the volume of traffic stated in paragraph 3.3.4 above i.e.1415 vehicles per hour.

3.3.8 I have concluded that the above assessment confirms my view that the existing link road between the Bradford Road Roundabout and the Beechcliffe Roundabout has adequate capacity and that the traffic entries onto these roundabouts are the cause of congestion in this area.

3.3.9 I remain unconvinced that the traffic modelling undertaken by CBMDC is a true representation of the effect of this scheme on traffic delays.

3.3.10 I remain of the view that the scheme will not reduce the peak period congestion in this area.

3.3.11 I have over 20 years' of personal local experience of the traffic growth and congestion on Hard Ings Road and the surrounding Keighley areas. The main congestion is at the approach to the Bradford Road Roundabout and also the Beechcliffe Roundabout; this is only during peak time traffic, approximately one hour in the morning (8am – 9am) and 1 hour in the evening (5pm – 6pm).

3.3.12 I use this road countless times during the day, including during peak times. My actual experience during peak traffic is that once my vehicle is on Hard Ings Road, in either direction, there is no traffic congestion and the traffic always keeps flowing. In the eastbound direction, traffic keeps flowing until you reach the red phases of the traffic signals at the Bradford Road Roundabout. Therefore, the proposed Hard Ings Road dual carriageway will not address the congestion problem; the congestion is not on Hard Ings Road, it is before Beechcliffe and Bradford Road Roundabouts.

3.3.13 My observation is the scheme has not been properly thought through and is not addressing the actual congestion problem areas, Bradford Road Roundabout and Beechcliffe Roundabout. I hold CBMDC to strict proof to the congestion areas and the proposed scheme will solve this congestion and not create further congestion.

3.4 Objection No.4- Traffic Growth Forecasts

3.4.1 I believe that the forecast design year traffic flows along the A650 Hard Ings Road used in support of this improvement scheme are derived from growth rates that are not based on historic data.

3.4.2 In 1996 traffic data forecasts suggested that traffic along Hard Ings Road would increase by 76% over 20 years whereas in reality it only increased by 11%.

3.4.3 I have received the following response from the CBMDC with respect to the above.

The CBMDC has not had access to detailed plans or traffic analysis of the previous Department for Transport (DfT) scheme and are therefore unable to comment on its data in detail. Nevertheless the CBMDC's case will show that traffic counts along Hard Ings Road have not seen a significant increase because the road is already running over capacity and cannot accommodate a significant increase in traffic flows since vehicles are unable to enter this section of road network and are held on the approaches in queues on the A629 / A650 Aire Valley Road.

3.4.4 I accept that the figures I have quoted were from a traffic analysis undertaken by the Department for Transport. However, I remain of the view that the traffic growth rates used by the CBMDC in the traffic modelling of this scheme are not based on historic data.

3.4.5 In the absence of data supporting the growth rates used by the CBMDC, I am not convinced that the traffic modelling of this proposal provides a true representation of the performance of this scheme in the design year.

3.5 Objection No.5- Trip Redistribution

3.5.1 I have suggested that an alternative option for the A650 Hard Ings Road Improvement Scheme should be explored.

3.5.2 I understand that Royd Way and Royd Ings Avenue are currently used for access to Keighley Cougar and the B&Q Retail Park and for trips to Stockbridge and the Bingley area along Royd Ings Avenue and Bradford Road and Keighley Road towards Bingley. I am of the view that both of these roads have adequate spare capacity and reassigning trips for these destinations from the A650 would significantly reduce the eastbound trips along Hard Ings Road. There would then be adequate capacity for one traffic lane in the eastbound direction along the proposed dual carriageway.

3.5.3 I do not appear to have received any response from MBDC concerning this alternative but I am of the view that, if trips could be effectively redistributed as I

have suggested, then there may be a possibility of reducing the eastbound carriageway to a single lane. However, I am not in a position to ascertain the effect of this option on the eastbound approach to the proposed traffic signal controlled junction of the A650 Hard Ings Road with Lawkholme Lane at peak periods which may also impact upon the performance of the traffic signals at the roundabout to the west.

3.5.4 I am advised that a single lane exit from the roundabout onto the eastbound carriageway of Hard Ings Road may also affect the performance of this traffic signal controlled junction in peak periods.

3.5.5 I have also been advised that a single lane eastbound along Hard Ings Road which is kerbed on both sides would present difficulties for traffic passing a broken down vehicle. However, measures such as the provision of hard strips could be incorporated into the scheme to allow the safe passage of traffic in the event of such a breakdown.

3.5.6 I have not been provided with any details concerning consideration of Non-Motorised Users (NMU's) in connection with the single lane eastbound option and am not aware that the CBMDC has commissioned an NMU survey. I am therefore unable to offer any comment concerning the effect of a single eastbound lane on NMU's.

3.5.7 This option would effectively reduce the overall width of the proposed dual carriageway which would provide a financial benefit with respect to the construction cost of the scheme.

3.5.8 This option would also reduce the width of land required from my site and other plots fronting the proposed eastbound carriageway of scheme.

3.5.9 I have concluded that there are significant benefits in the reassignment of some traffic as suggested and that this option should be modelled so that a proper comparison can be made with the proposed scheme.

3.6 Objection No.6- Toucan Crossing Facility

3.6.1 I have requested that CBMDC provides the following evidence in support of the proposed toucan crossing at the traffic signal controlled junction of the A650 Hard Ings Road with Lawkholme Lane :-

- a) Evidence of any NMU surveys undertaken in connection with the proposals,
- b) Results of cyclists and pedestrian surveys, desire lines and predicted peak hour demands.
- c) Evidence of consideration of alternatives such as a footbridge, underpass or improvements to the existing refuge crossing.

3.6.2 I have received the following response from CBMDC.

A pedestrian survey was undertaken throughout the length of Hard Ings Road in 2014 (to input into the traffic model) indicates a total of 40 pedestrians cross Hard Ings Road between 07.00-10.00 and 88 cross the road between 16.00 – 19.00 on a typical weekday. Although, the number of pedestrians crossing Hard Ings Road is relatively low, for the reasons given above, it is advantageous to incorporate an at grade pedestrian crossing, since we are providing a signalised junction anyway at this location, and taking into consideration we are removing the existing pedestrian refuge at Hard Ings Road in the vicinity of Byrl Street.

The traffic signals at Lawkholme Lane on the proposed eastbound carriageway will only be called when a pedestrian uses the crossing adjacent to the access to Keighley Cougars. Throughout the week we would expect this to be an irregular occurrence, being used mainly at weekends when rugby matches take place at Cougars.

The proposed cycling facilities at Hard Ings Road have not been designed to meet an existing demand, but are included to encourage cycle usage and improve connections to other cycle routes in the area and have been developed in liaison with Bradford's cycling group BSpoke. There is a general national and local strategy to encourage cycling alongside integrated transport.

Consideration is given to the provision of either a subway or a pedestrian bridge where stopping traffic is not an option and where the number of users justify the costs.

Pedestrian overpasses over highways are expensive, especially when long ramps for wheelchair users are required. Without ramps, people with mobility issues will not be able to use the structure. One significant barrier to the use of a pedestrian bridge is the distance added to the pedestrian/bicyclist's route. Because of the need to get up above cars and HGV's, straight or spiral ramps are typically used that will be very long to achieve the necessary ramp gradients for wheelchair users for Disability Discrimination Act (DDA) compliance. Most people tend to view the extra distance as a burden that will cause too much delay to them with the additional effort to climb up the bridge and go over it, and instead will cross at grade at the nearest convenient location sometimes jaywalking to avoid the obstacle of the bridge.

Throughout the Bradford district, footbridges and subways are being removed and replaced with surface crossings where it is feasible to do so. Similar to footbridges, subways can cause pedestrian detours and lengthen journeys on foot due to the length of ramps necessary to be accessible to disabled people. The design of subways removes any natural surveillance which can act as a precursor to crime problems or fear of crime. Both outcomes can in turn reduce the number of journeys on foot. Subways also provide a point of shelter which can result in anti-social and / or criminal behaviour, as well as a point for collecting wind borne rubbish thus making them unattractive to use.

There is also the additional land take to take into consideration for the provision of the installation of the ramps / steps to either a footbridge or a subway, which would have to be accommodated within a significantly widened footway on both sides of Hard Ings Road, probably in the region of an additional 6.0 metres adjacent to the extent of the ramp / steps structure. However, some land take would be saved by providing a reduced central island to accommodate traffic signals only and not a pedestrian refuge, in the region of approximately 1.0m.

There are also buildability issues to take into consideration, such as the diversion of Statutory Undertakers equipment and the existing sewer for a subway construction, as well as the presence of ramps / stairs in front of residential properties who take access directly off Hard Ings Road, with no garden area acting as a buffer between the footbridge structure and their windows, and the additional traffic management that would be necessary to provide these additional structures on Hard Ings Road.

Taking into consideration the above, both a pedestrian footbridge and subway options have been discounted at the Hard Ings Road / Lawkholme Lane junction. Instead, choosing to incorporate an at grade pedestrian crossing facility at the signalised junction designed to aid turning vehicles at this junction.

3.6.3 It would appear from the information provided that NMU surveys have not been undertaken in connection with the road improvement proposals. The CBMDC have relied solely upon pedestrian surveys undertaken in 2014 and concluded that the use of the proposed toucan crossing is expected to be mainly at weekends when rugby matches take place at Keighley Cougars.

3.6.4 These pedestrian surveys are out of date. Keighley Cougar rugby matches were previously accessed from Hard Ings Road and are now exclusively accessed from Royd Ings Avenue; resulting in considerably reduced pedestrian crossing at Hard Ings Road. Keighley Cougar home matches average twice a

month, normally on a Sunday and for a nine month period; therefore, an average total of 18 Sunday matches in one year period. All supporters in vehicles attending Keighley Cougar will park on Royd Ings Avenue and access the ground from there; these pedestrians will not be anywhere near Hard Ings Road or the proposed Toucan Crossing. Majority of supporters using public transport will walk along Bradford Road, cross at the Bradford Road Roundabout under passage and continue to walk along Alston Road onto Royd Ings Avenue to access the Keighley Cougar ground. These pedestrians will not require or be in the proximity of the propose Toucan Crossing; again, raising serious doubts on the CBMDC decision making process.

3.6.5 I am critical of the use of survey data obtained three years ago and not relevant to the current true situation.

3.6.6 The information provided also indicates that there is no demand for cyclists crossing Hard Ings Road. However, the proposed toucan crossing is designed for use by pedestrians and cyclists. If the crossing will not be used by cyclists, I consider that a puffin crossing would be more appropriate if there is sufficient pedestrian demand; I believe there is insufficient pedestrian demand to qualify for this type of crossing.

3.6.7 The CBMDC have indicated that there is a low pedestrian demand throughout the week and that the crossing will be used mainly at weekends when rugby matches take place. I have concluded that the usage envisaged does not justify the provision of this crossing facility. This CBMDC data and information is simply wrong and not reliable with information detailed in 3.6.4. Therefore, serious doubt is raised on the decision making process, which has been made on inaccurate and wrong data.

3.6.8 No information has been provided to indicate desire lines for the pedestrian demand and I am not convinced that the junction with Lawkholme Lane is the right place for a pedestrian crossing anyway. Proper analysis of the actual site conditions would conclude that this proposed pedestrian crossing location is a potentially dangerous location, as pedestrians, particular children will be encouraged to race across Lawkholme Lane and the Petrol station entrance to reach this crossing when green.

3.6.9 Only a very small number of pedestrians from the north side of Hard Ings Road (5 businesses in Coronation Business Centre and Fibreline) use the existing crossing to the McDonalds side of the road; in the main, the pedestrian crossing is to reach McDonalds as a destination.

3.6.10 Pedestrians walking eastbound on Hard Ings Road use the pedestrian under passage at the Bradford Road Roundabout. The proposed Toucan Crossing will divert pedestrian crossings from the Bradford Road Roundabout

under passage to this proposed Toucan Crossing; therefore, creating more and frequent congestion when the lights are activated red. The Toucan crossing will ultimately be used as an alternative to the Bradford Road Roundabout under passage, potentially placing the under passage in disuse and attracting antisocial behaviour.

3.6.11 In the last ten years, there have been five individual pedestrian accidents with a slight injury; in the same period and in 2010 there was one serious accident involving two pedestrians; there have been no fatal accidents in the same period. I believe there is no evidence for the requirement of a Toucan Crossing.

3.6.12 I have concluded that there is no cyclist demand and low pedestrian demand which do not justify the expense of the installation of the toucan crossing or a puffin crossing. In my view, a far more practical, economical and operational facility would be to upgrade the existing facility at Hard Ings Road in the vicinity of Byrl Street. This is a proven desire line location and the cost of a new pedestrian refuge would be far less than the provision of a toucan crossing at an unverified location with no cyclist demand and low pedestrian demand.

3.6.13 I hold BMDC to strict proof that this Toucan Crossing is necessary and will not create new additional congestion.

3.7 Objection No.7- Traffic Signal Controlled Junction with Lawkholme Lane

3.7.1 I have requested that CBMDC provides details of traffic modelling, vehicle and pedestrian phasing diagrams and queue lengths at stop lines demonstrating the performance in support of the proposed traffic signal controlled junction of the A650 Hard Ings Road with Lawkholme Lane.

3.7.2 I have received the following response from the CBMDC.

The signalised junction at Lawkholme Lane has been designed to provide a safe right turn into Lawkholme Lane from Hard Ings Road and a left turn out of Lawkholme Lane into Hard Ings Road. Loop detection is to be provided within the right turn lane on Hard Ings Road on the approach to the signalised junction with Lawkholme Lane. When the queue of traffic exceeds a designed queue length, this will call the signal on the westbound carriageway, stopping the traffic on this side of the road and permitting vehicles to turn right into Lawkholme Lane and left out of Lawkholme Lane.

3.7.3 This information is insufficient for me to consider the traffic delays at this traffic signal controlled junction. The output data from the modelling of this junction has not been provided so I am unable to comment on queue lengths and delays. I remain of the view that the existing priority junction should be retained but with a ban on the right turn from Hard Ings Road. This traffic could simply be directed to the roundabout and then back onto Hard Ings Road so that it can turn left into Lawkholme Lane. My observations are that queues for the left turn into Hard Ings Road from Lawkholme Lane are never very long, typically around 12 vehicles and that is during peak periods; there is an alternative route in any case. Frequently during peak traffic, Lawkholme Lane close to the junction with Hard Ings Road is forced to operate as a single lane. The scrapyard business park large vehicles on one side of Lawkholme Lane and sometimes other vehicles visiting this same business park on the opposite side. However, the traffic always manages to flow and this further supports this junction does not require traffic control signalling.

3.7.4 If the traffic signalling is installed at this Lawkholme Lane junction and when the traffic proceeds to join Hard Ings Road during the green phases of the traffic signals; you will nearly always find not all vehicles will be able to proceed one after another, as some vehicle will be temporarily blocked by the parked vehicles as discussed in 3.7.3. There is already parking restrictions on this part of Lawkholme Lane, therefore, any new restrictions or enforcement of existing restrictions will not make the necessary difference.

3.7.5 It is clear to me that the proposed traffic signal control will inevitably result in delays on Hard Ings Road during red phases of the traffic signals at all times of the day and these delays will be even more significant during peak periods.

3.7.6 My observations with the facts on the ground are that the traffic on Hard Ings Road is free flowing and only congestion is the eastbound traffic at the Bradford Road Roundabout; this is caused by the red phases of the traffic signals at that roundabout. The westbound traffic has little or no congestion at the Beechcliffe Roundabout, even during peak periods, as there are no traffic signals at this roundabout. My view is the proposed Traffic Signal Controlled Junction with Lawkholme Lane will create considerable congestion in both directions during peak periods; this is supported by the impact of the traffic signalling at the Bradford Road Roundabout at present.

3.8 Objection No.8- Beechcliffe Roundabout

3.8.1 I have now received the following information from the CBMDC concerning the traffic modelling of the proposed signalisation of Beechcliffe roundabout.

The lack of capacity on Hard Ings Road results in considerable congestion at peak times with traffic queuing on beyond both Bradford Road and Beechcliffe

roundabouts. The Beechcliffe roundabout is also running over capacity, specially the traffic approaching from A629 suffer long delays. The average queue length on the A629 approach to Beechcliffe Roundabout at peak times is around a kilometer which reflects through speed data collected in 2016. This showed an average speed about 9mph against the posted speed limit of 70mph in evening peak period (17:00-18:00). The historic traffic speed data also shows the journey time on A629 has been increased by 54% within last five years from 2012 to 2016. The journey time in 2012 was 295 seconds which had been increased to 455 seconds in 2016. Similarly the journey time along A650 Aire Valley Road has been increase by 42% in morning peak and 26% in evening peak period. Speed records show that the average traffic speed along Hard Ings Road is 14mph during the AM and PM peak periods in the eastbound direction and 14mph in the AM peak and 11mph in the PM peak, in the westbound direction against a posted speed limit of 30mph. In addition to significant peak time congestion, the junction can also suffer from considerable delays at other times, in particular on a Saturday with local traffic trying to access the Keighley Retail Park which can only be accessed from Hard Ings Road. Saturday lunchtime traffic levels on Hard Ings Road approach those experienced in the commuting peaks during the week.

The capacity of Beechcliffe roundabout would also be improved by remodelling and the implementation of traffic signals on all arms and an additional traffic lane on the approach to the roundabout from the A629. Queues on the A629 will be much shorter due to the provision of an extra lane on the approach to Beechcliffe Roundabout. Two lanes have also been allocated for the exit into Hard Ings Road from the roundabout. This arrangement will increase the capacity of the junction and will operate effectively in the design year, 2026. At present the single lane provision on Hard Ings Road causes congestion to back up onto and through Beechcliffe Roundabout and beyond at peak times.

3.8.2 The information provided is insufficient for me to consider the traffic delays at this proposed traffic signal controlled roundabout. The output data from the modelling of this junction has not been provided so I am unable to comment on queue lengths and flow/capacity ratios (RFC's). Whilst in theory there may be improvements to journey times but I have extensive practical knowledge of the actual performance of this junction at all times of the day and remain of the view that the existing roundabout performs satisfactorily even in the peak periods. Once traffic enters the roundabout, I have observed that it is free flowing. It is clear to me that the proposed traffic signal control will inevitably result in delays during red phases of the traffic signals at all times of the day and these delays will be even more significant during peak periods. I am sceptical of any benefits resulting from these proposed works and remain of the view that the existing layout should be retained.

3.8.3 My observation is the A629 Hard Ings Road approaching the Beechcliffe Roundabout from Keighley would benefit from two proper lanes, both to carry traffic eastbound on Hard Ings Road and left lane to direct traffic left onto A629

towards Skipton; this would reduce congestion on the A629 Hard Ings Road from Keighley Town centre.

3.8.4 My observation is the A629 dual carriageway approaching Beechcliffe Roundabout from Skipton would benefit from both lanes turning left and to merge eastbound on Hard Ings Road towards Bradford. This would considerably reduce congestion on the A629 dual carriageway from Skipton. Many vehicles use the right lane on A629 dual carriageway approaching Beechcliffe Roundabout and travel around the full roundabout and then take the Hard Ings Road eastbound turning towards Bradford. The left lane can filter to Royd Way for traffic to Keighley Cougars, B & Q retail park, Stockbridge and Bingley.

3.8.5 My observations with the facts on the ground are that the traffic on Hard Ings Road is free flowing and the only congestion is on the eastbound traffic at the Bradford Road Roundabout; this is caused by the red phases of the traffic signals. The westbound traffic encounters no congestion at the Beechcliffe Roundabout, even during peak periods, as there are no traffic signals at this roundabout. My view is the proposed Traffic Signal Controlled Beechcliffe Roundabout will create similar congestion caused by the traffic signalling at the Bradford Road Roundabout.

STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true opinions on the matters to which they refer.

Signature

A handwritten signature in blue ink, enclosed in a black rectangular box. The signature appears to be 'Mary Guter'.

Date 1st December 2017