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My Ref: PTH/HS/103197/GEN/CEY

Your Ref: GGW/RMS/FIB.26-1

25<sup>th</sup> July 2017

Dear Sirs,

**The City of Bradford Metropolitan District Council (A650 Hard Ings Road Improvement Scheme, Keighley) Compulsory Purchase Order 2017  
Fibreline Limited, Victoria Park Mills, Hard Ings Road, Keighley**

We refer to your letter addressed to the Secretary of State, dated 25 May 2017, in connection with the above Compulsory Purchase Order (CPO) (the 'Order').

We note your client's objection to the Order and take on board the concerns raised in your letter. We respond to your client's individual concerns below.

**Significant detrimental impact on the ability to operate from their business premises.**

We have offered to undertake accommodation works to help mitigate the impact of the scheme on the Fibreline property, including the possibility of widening the entrance and providing a new ramp to a low level car park or a road level car park option, and the provision of a relocated pedestrian access. You have received our letter addressing your clients concerns regarding access to and from the premises during the construction phase and have responded with further queries. We will respond to this subsequent letter in the near future.

**There are likely to be significant affects on the usability of the office premises due to :-**

**Loss of Light**

The proposed scheme will not have a significant impact on daylight. The Technical Daylight Amenity Impact Assessment undertaken by Gray Scanlan Hill has demonstrated



through accepted practice technical analysis (scientific measurement) that the offices will continue to achieve adequate / good levels of daylight, measured against current Design Guidance and British Standards.

As part of the technical study, it was measured that the proposed scheme will result in the offices experiencing a small reduction in daylight amenity but not to an extent that would be noticed by the room occupants. Notwithstanding that reduction, daylight levels would continue to be adequate / good, measured against current Design Guidance and British Standards.

### **Increase in Noise and Vibration**

The Council has carried out a noise and vibration assessment at Fibreline's property. The assessment concludes that there will be a small increase in both noise and vibration levels once the scheme is completed. However, these are expected to be at a low level and will be largely imperceptible. As such we do not believe the road widening scheme will result in a significant increase in noise and vibration levels.

Ground-borne vibration levels were also measured as a mix of vehicles passed 'Fibreline' at varying distances from the current carriageway alignment. This measurement exercise indicated that moving the carriageway 3 metres closer to the building was unlikely to lead to any significant change in the current vibration climate within the premises, with no vibration levels measured within the building being above the threshold of human perception, and all levels recorded being far below the level at which (even cosmetic) damage might be expected to a sound structure.

### **Safety**

The proposed parapet will be designed to provide vehicle containment unlike the existing dry stone boundary wall, which provides little protection from an errant vehicle, an improvement to the safety of occupants to the building.

### **Security**

In terms of security, we do not believe the gap between the building line and the proposed parapet wall to the retaining wall is close enough for a person to climb across without the aid of ladders/planks at a part of the building that is clearly visible from the road. However, we have previously advised that if this is a real concern, improved security measures could be considered as part of a compensation package.

### **Overbearing Impact and effect on the outlook for occupants of the offices**

In planning terms, a building or structure is usually considered to have an overbearing impact if it would have such an oppressive impact on the occupiers of the affected building as to demonstrably harm the use of the building. The Technical Daylight Amenity Impact Assessment referred to above demonstrates that the construction of the retaining parapet wall adjacent to the Fibreline office windows will not result in a significant loss of light to the offices therefore the use of the building will not be compromised by loss of daylight.

In terms of outlook / aspect and openness, the existing view from the offices is not 'open'; it is dominated by the grassed embankment (which currently retains the difference in level between the offices and Hard Ings Road) and the stone boundary wall at the top of the embankment. The effect of the proposed road widening works will be to reduce the distance between the office windows and the adjacent embankment/wall, but the works will not result in a currently 'open' aspect being transformed into an enclosed aspect. Furthermore although the distance between the existing embankment/wall and the office will be reduced, some separation will be retained so that an unacceptable overshadowing affect will not occur.

In terms of the character of the proposed retaining wall, we have previously advised that landscaping could be provided to the rear of the wall. This could be either at a low level or within a raised bed. We have explained that facing treatments for the retaining wall could resemble the existing stone wall if desired. The parapet to the retaining wall could be either solid or a metal parapet (that can be seen through). However, noise attenuation and privacy will be improved with a solid wall.

Given the urban location of the Fibreline site and the usage of the affected rooms (offices), and having regard to the suggested accommodation works, it is not considered that the impact of the proposed road widening works would be such that the use of the offices would be demonstrably harmed. Therefore, given that it has also been demonstrated that the proposed road widening project would not unacceptably harm the usage of the offices through loss of light, the proposed works are not considered to have an unacceptably detrimental visual impact on Fibreline's offices.

**Persistent noise disturbances over a sustained period during working hours could be detrimental to health, productivity and the company's ability to retain and hire staff.**

The HSE advise that noise can be considered to be a problem in the workplace if it is intrusive or worse than intrusive for most of the working day and identifies noise exposure action values. Noise calculations supplied by the noise assessment (which is based on the forecast traffic increases taking into account the proposed new alignment of the carriageway) indicate that noise exposure levels will not exceed the lower exposure action value in accordance with the Noise Regulations.

**The Scheme is not justified.**

The Scheme has been accepted as a qualifying scheme and prioritised by West Yorkshire Combined Authority (WYCA) within the West Yorkshire Plus Transport Fund (WY+TF) programme. Initially, a 'long list' of over 120 projects were reduced into a 'medium list' of 60. The prioritised package included 33 projects, and the Hard Ings Road project was ranked at 14<sup>th</sup> across West Yorkshire.

The Scheme has been developed and received Development Approval (Gateway 1) of the WYCA Assurance Framework governance process in May 2014. In doing so it has demonstrated that the Scheme will provide an acceptable level of value for money, has a clear set of objectives and a realistic chance of successful implementation. The scheme

aims to support economic growth and improved quality of life through reducing congestion, improving pedestrian and cycling facilities and reducing air pollution.

We have not had access to detailed plans or traffic analysis of the previous Department for Transport (DfT) scheme and are therefore unable to comment on the Annual Average Daily Traffic (AADT) data in 1996. Different sources have been used to collect traffic data within the project area, such as Automatic Number Plate Recognition (ANPR), Automatic Traffic Count (ATC), and Classified Manual Turning Counts at all major junctions along Hard Ings Road. These traffic counts have been used to build a traffic matrix for the base year 2014 in our traffic Model.

The traffic data collected by the Department for Transport (DfT) at Hard Ings Road does not show a significant change in AADT between 2000 to 2014. DfT traffic data has been analysed on consecutive road sections either side of Hard Ings Road, i.e. the A650 Aire Valley Road and the A629. It is observed that for the period 2000 to 2014, AADT has increased by approximately 11% on routes either end of Hard Ings Road, compared with traffic flows on Hard Ings Road itself increasing by only 3%. The traffic growth after opening Bingley By-pass shows a significant increase along A629 and A650. The DfT traffic data indicates an increase in AADT of around 14% between the period 2005 to 2016. Recorded AADT's gradually increase at sites moving away from Hard Ings Road. This is due to the fact that Hard Ings 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.

The National Trip End Model (Tempo) has been used to determine the appropriate growth factors based on the Keighley area as agreed with the West Yorkshire Combined Authority (WYCA). A micro-simulation traffic model has been developed to represent traffic conditions at two different times of day for a base year 2014, namely AM Peak Hour (07:30-09:30) & PM Peak Hour (16:30-18:30). The 2014 base model has been calibrated and validated for AM and PM peak hours in line with DfT's WebTAG and Design Manual for Roads and Bridges (DMRB) guidance in terms of link flow/journey time validation.

**No alternative options for retaining and improving the two lanes and improving the Beechcliffe and Bradford Road roundabouts have been considered.**

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 in 2014.

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 2550 vehicles per hour in two-way flows. Therefore, at present the capacity of the existing road layout is inadequate at peak hours.

The data supplied previously via Axis is data used for the noise assessment outside Fibreline's offices and applies to this section of the road only. The traffic flows are significantly higher on the section of Hard Ings Road between Lawkholme Lane and the A629 dual carriageway.

Using these predicted traffic flows, in accordance with the DMRB, the types of road and carriageway width were considered. This approach was chosen to quickly identify a scheme footprint and also to identify the extent to which land and property would be affected. This assessment identified four options which could provide for the predicted demand in 2026:-

- single 4 lane 14.6m wide carriageway,
- dual 6.75m wide carriageway (with sub options as the scheme was developed),
- dual 7.3m wide carriageway, and
- composite part dual 6.75m wide carriageway, part single 6.75m wide carriageway.

Initial options considered the feasibility of widening on each side of Hard Ings Road. It was however apparent that given the constraints of housing and the presence of Victoria Park, that potential for widening on the south side of the road was very limited without severe environmental impact. Accordingly, such options were not pursued. In order to protect residential properties adjacent to the south-western kerblines, avoid legal issues with respect to the restrictive covenant in place at Victoria Park and the re-location of the gas governor, options were restricted to widening on the north eastern side of the carriageway only.

Although a four lane single carriageway option throughout the length of Hard Ings Road has the least land take of all options, it was discounted due to road safety implications, since all turning movements for vehicles would be possible in the absence of a central reserve. Although traffic movement restrictions could be introduced, they are unlikely to be effectively enforced, and could therefore result in more turning conflicts, particularly at entrances/exits to the numerous business premises.

Dualling the full length of this section of Hard Ings Road with (with no right turns) was also given consideration but was discounted for several reasons. Firstly because there are many businesses located off Hard Ings Road who would be significantly affected in terms of access. Secondly, because this option has the greatest implications on land take, particularly adjacent to the Fibreline building. Thirdly because it would require a significant re-design of the Bradford Road roundabout. This would be necessary because the roundabout would have to deal with traffic being re-routed as the existing right turn from Lawkholme Lane would cease to be operational.

The proposed Scheme is a composite part dual 2 lane and part single 4 lane carriageway (from Coronation Business Centre to Bradford Road roundabout). This has benefits with respect to minimising land take, particularly in front of Fibreline's premises. The proposed Scheme has been developed with a signalised junction at Lawkholme Lane incorporating a Toucan crossing (to replace an existing pedestrian refuge). This retains the convenience

of a right turn from Hard Ings Road into Lawkholme Lane as the current situation, and avoids the unnecessary re-routing of this traffic to U-turn at the Bradford Road roundabout. The retention of a junction and conversion to traffic signal control at Lawkholme Lane maintains local accessibility, and avoids the unnecessary diversion of local traffic, increased journey lengths and additional traffic loading at the Bradford Road roundabout. There are also a significant number of right turning movements into the petrol filling station and the adjacent McDonalds restaurant from Hard Ings Road. Therefore, a right turn priority facility with a dedicated turning lane (to allow through traffic to proceed unobstructed) has been included within the scheme.

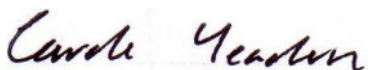
The capacity of Beechcliffe roundabout is improved in the Scheme by the remodelling of the roundabout to provide additional lanes on the roundabout itself, the implementation of traffic signals on all arms and an additional traffic lane on the approach to the roundabout from the A629. Two lanes have 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.

The two lanes allocated in each direction for the full length of Hard Ings Road will remove bottlenecks when vehicles merge into one lane, compared with the current one lane provision in both directions, and will provide for the predicted demand in 2026. Bradford Road roundabout is currently operating with spare capacity. However, in the current situation, vehicles exiting the Bradford Road roundabout onto Hard Ings Road westbound, merge into one lane adjacent to the ambulance station, causing congestion to back up on and through Bradford Road roundabout and beyond at peak hours. Modelling has demonstrated that with the re-timing of signals, this junction will operate acceptably in the 2026 design year.

We hope the above answers your client's concerns and we would be happy to meet if this would be helpful. We look forward to progressing discussions concerning compensation and hope that your client will feel able to remove their objection to the CPO in the near future.

Finally, please note that this response is without prejudice to current and future negotiations with the Council and its representatives.

Yours faithfully



Carole Yeadon  
Senior Engineer