

## **Objections on highways/parking grounds: submitted by Anthony Rae**

1. My name is Anthony Rae; I have been a resident of Hebden Bridge for 30 years. I do not have a professional qualification in transport or planning issues. I have been involved in a number of initiatives and planning applications in the town where there is a connection between retail activity and parking:

- In the mid-1990s I was the lead objector to proposals at the Walkley's Clogs location to create an 'out of town' shopping centre, which generated excessive traffic flows and parking/access problems. The proposals were rejected at public inquiry for which I prepared and presented the evidence.

- In 2007-8 I was the lead objector to a proposal to create an underground car park at the Garden Street town centre location, which was to be funded by excessive amounts of commercial development. The proposals were rejected at public inquiry for which I prepared/presented the evidence, which included detailed parking surveys for the town.

- In 2012 and in discussion with the developers I examined the traffic impacts of the planning application for a supermarket and hotel at the Mytholm Works, King St site to the west of Hebden Bridge, which included a 170 space car park. Their transport consultant provided a detailed analysis indicating that capacity at the new junction to the site from the A646 was sufficient not to cause disruption to traffic flows along the main road and so I personally did not present an objection, in the context where the LPA officers had also indicated that they would not be assessing the separate cumulative impact of increased traffic flows through the town centre itself.

2. In my capacity with Calderdale Friends of the Earth I was the original proponent of the town centre pedestrianisation scheme that was subsequently implemented in the mid-2000s, and was a member of and spokesman for the Hebden Bridge Traffic Review undertaken by Calderdale Council in conjunction with local representatives. Measures that resulted from the review, which were approved in a public consultation, included the introduction of on-street parking charges (balanced by a 'free first hour' provision in the town centre 'triangle'), and the construction of the Station Road longstay car park by Hebden Royd Town Council. I'm a director of the Hebden Bridge Partnership which in its *2020 Vision* document is pursuing two strategic transport proposals: to create an integrated multimodal transport hub for the town at the railway station location, primarily by the expansion of the station car park (this has very recently been identified for provisional implementation in the West Yorkshire Combined Authority transport fund programme), and the introduction of a 'shared space' scheme building on the first phase of pedestrianisation (understood to be a longer term, strategic objective in view of cost constraints).

The intention is that, consistent with the parking strategy established by the Traffic Review, the parking expansion at the station location would not just be for rail users but be available to provide additional longstay capacity for the town centre at periods of peak demand (such as weekends and bank holidays) when rail commuter use is less.

3. All the above has given me some considerable experience and detailed knowledge of the intricate difficulties of balancing supply and demand for parking in Hebden Bridge - which as a significant visitor destination attracts peaks of demand, for instance at summer weekends and bank holidays - and where the absence of flat sites in or near the town centre (with the exception of the station location) means that it is in practice difficult to foresee how a 'solution' to increased parking demand can be met by increased supply of physical spaces. A further constraining factor is that there is only one single main access route to the town along the length of the Calder Valley (A646), which experiences frequent traffic congestion on both the east and west sides of the town as well as in the town centre itself. Consequently, and increasingly as both car ownership and traffic levels experience trend increases, it could be said that both access to and parking in the town are on something of 'a knife's edge'.

4. This means that very careful attention has to be paid by policy and decision makers to maintaining a balance between parking supply and demand - i) by using the full range of mechanisms available including changes to parking charges and length of stay, and ii) by careful assessment and balancing of the amount of activity and types of uses to be encouraged or sanctioned in the town centre - if the viability of the retail sector, and economic activity more generally, in the town is to be protected, and the amenity of residents preserved. However as the assessment of the Mytholm Works site application demonstrated, the planning framework is not well able to respond to applications where the consequence of cumulative changes to highway or parking capacity are at issue, and where the provision of adequate sustainable transport facilities is not a policy requirement either of the existing UDP or the NPPF.

5. The purpose of this submission is threefold:

- to challenge the assertions in the Transport Statement submitted by the appellant that the development will have little or no impact on highways issues, although these assertions are not supported adequately by evidence as they need to be.

- to identify a number of propositions for the inspector to test, which argue that proceeding with the application will - primarily by resulting in a significant reduction in the town centre parking stock - precipitate an increase in traffic congestion and potential road safety conflicts in the area around the application site directly, and indirectly impact negatively on the retail, economic and social viability and activity of the town.

- to identify also some technical questions about the operation of the loading bay provision.

6. It is noted that the retail activity at the site will be on a larger scale - 399m<sup>2</sup> (298m<sup>2</sup> ground floor and 101m<sup>2</sup> first-floor storage\*) - than the previous 2007 permitted application (which was 318m<sup>2</sup>), and will also be much more intensive: because it will be operated by a national supermarket chain, whereas the ground floor retail space was previously divided between two (much more likely to be) independent shops; and because the supermarket will open for much longer hours: 7am-11pm Monday-Saturday and fractionally less on Sunday. There will also be an ATM at the site, which will generate additional movements.

[\*NB the Planning Statement *para* 1.3 has the area at 460m<sup>2</sup> but I'm presuming that's a mistake because it doesn't tally with the floor plans.]

7. Since the supportive conclusions of the Calderdale Council Highways Network Manager in the LPA committee report about this application 'not creating any undue highway safety issues' are cited *TS paragraph 1.5*, I should also note that I thought the highways assessment in that report was inadequate because it did not evaluate the issues contained in this submission. Therefore whilst the Transport Statement may choose to concentrate on the service delivery arrangements (consequent to the grounds for refusal *TS1.7-8*), the thrust of this submission is that the inspector needs to firstly look a little wider at other highway impacts (including parking) so as to relate these back to the particular concerns of the UDP policies set out in *para.44* below, but secondly then understand how those highway and parking impacts could affect the town more generally.

8. The inspector will also wish to note the judgement of the officers at the time the 2007 permission was renewed: "the site is situated within the town centre zoning and in accordance with policy T18 does not require on site parking *unless it is envisaged that parking conflicts will occur*" *my emphasis*. My submission is that this should have been, and is, a material issue in the determination of this significantly more intensive application, which as the application form states will result in the loss of 33 parking spaces on the site (answer to question 10). The appellant at *paragraph 1.12* essentially accepts the validity of raising and testing this issue.

9. Because the applicant has chosen a Written Procedures appeal, which therefore prevents interactive interrogation of their case by objectors, my submission is that they needed to provide actual evidence to support statements or assertions they are making, and that if they don't provide such evidence then the inspector should be able to give much less weight to those

parts of their case.

The assertions or statements of the Transport Statement are as follows:

**A) 'The store is unlikely to generate new car trips or additional parking demand.'** TS 2.6

10. No evidence is provided in support of this assertion, and therefore the Inspector should question its validity. On Thursday 16th April I conducted photographic surveys of the car use associated with the nearby Sainsbury's Local store in Mytholmroyd (files of this evidence are available to all parties on request, and see the photographic appendix). The Mytholmroyd store has 4 dedicated parking spaces, and a dedicated loading bay. Over a measured hour at lunchtime (12.55-13.55) there were 21 car movements at the site. At a second survey during the evening peak (17.05-18.05) there were 35 car movements, and this time a count was also made of footfall (adults entering the store) - they were 81 in number. This gives a ratio of car movements/adult shoppers of 43%.

11. Whilst there are differences between the specific location of the Mytholmroyd store and the Hebden Bridge site (by definition each site is to an extent *sui generis*) I submit that this evidence tends to disprove the assertion of the Transport Statement: 'additional parking demand' is clearly demonstrated at the Mytholmroyd store, and there is no essential difference I can identify that would invalidate a comparison. The Inspector will be able to observe similar behaviour on Crown Street in Hebden Bridge where motorists arrive outside the Oasis and One Stop convenience stores (who would be competitors for Sainsbury's), park, shop, and then leave. This activity tends to support a judgement that the Sainsbury's store would also 'generate new car trips' at its location.

12. It is the case that some Sainsbury's shoppers would be able to find parking spaces in the very adjacent existing Market Place car park, including at off-peak hours, but not during daytime/peak hours when it is usually full. Moreover this is a charged and enforced car park, whereas parking provision at their Mytholmroyd store (and also on Crown Street) is free and therefore it is more likely that people arriving by car to shop at Sainsbury's will seek a free, and on-street, parking space.

13. Irregular parking activity was also observed in the Mytholmroyd survey including parking in the disabled bay, and in the loading bay (see photographic appendix).

**B) 'the scheme will not have an adverse impact on car parking which would have any impact on highway safety.'** TS 1.12

14. I have already noted that the planning application form correctly identifies that the development would result in a substantial nett loss of 33 parking spaces from the town centre parking stock. By contrast the Transport Statement has sought to present this matter in a way which disguises its impact and attempts thus to remove it from consideration. Its paragraph 2.10, which talks about a -3/+2 impact on *on-street* parking spaces, dependent on the time of day, is therefore misleading.

15. The current situation needs to be understood in the context of the changes to Hebden Bridge's parking stock that have occurred over the last decade, for which the surveys I undertook in 2007 in connection with the Garden Street planning application provide a baseline. They need to be considered in parallel with related planning permissions. As follows:

- In 2007 the town centre on- and off-street parking stock was **398** spaces.
- Also in 2007 the original planning permission was granted for the Fire Station site, which after that time was allocated to temporary car parking use. So  $398 + 39$  (using the number of spaces derived from the Transport Statement; in practice they are poorly marked) = 437
- In October 2010 planning permission was given for the Town Hall extension building, resulting in the extinction of 'Town Hall' car park with 22 spaces. So  $398 + 39 - 22 = 415$ .

- Therefore if the Sainsbury's development were to proceed, the 39 spaces at the Fire Station site would be lost, and then an additional nett 3 on-street spaces removed as a result of the planning application. So  $398 + 39 - 22 - 39 - 3 = 373$ . So the total town centre parking stock would be reduced by nett 25 spaces or -6.3%.

16. But over the same period (2007-14) the number of cars in Great Britain, and therefore seeking parking spaces, has increased from 28.0m to 29.6m ([www.gov.uk/government/collections/vehicles-statistics](http://www.gov.uk/government/collections/vehicles-statistics) Table VEH0202) or +5.7%. This has the effect of exacerbating any net loss in the parking stock, by increasing demand for a smaller number of spaces. In aggregate therefore and in the situation of a Sainsbury's development, the Hebden parking supply would have decreased by 6.3% whilst demand increased by (of the order of) 5.7%.

17. However the localised impacts in the immediate area of the development site are much more pronounced. On Wednesday and Thursday market days 31 more spaces are lost at Market Place car park but the availability of the temporary Fire Station site car park immediately adjacent has provided some continuing capacity in the immediate area around the application site. However if the development takes place, on those two market days the loss of spaces since 2007 in the immediate area would be 31 (Market Place) + 22 (Town Hall) + 39 (Fire Station site) = 92 spaces. For the other five days a week the loss would be 22 (Town Hall) + 39 (Fire Station site) = 61.

18. My first submission is that these figures demonstrate that it cannot credibly be argued that 'the scheme will not have an adverse impact on car parking ...' (Of course that statement continues to make a connection with 'highway safety', and I will return to that issue in para.23 below).

19. But immediately, and taking the sum of my actual evidence presented so far, this must create further doubt about another assertion in the Transport Statement: "Whilst a limited number of pass-by car trips may occur, the majority of the customers of the store will be people who are currently shopping, visiting or working in the town centre. These customers will either already be using the existing off-street and on-street parking in the town centre or will have arrived in the town centre by another mode of transport." No evidence is submitted to support this assertion, and surely it will not be possible for customers to be 'using the existing off-street and on-street parking' if that has been substantially reduced in quantity.

20. A judgement about the balance between parking space supply and demand in Hebden Bridge town centre depends upon a quantification of recent changes (see above), and then an assessment of the extent to which parking demand is already high - including because of secular trends, but then recognising Hebden Bridge's status as a visitor market attraction - and spilling over into adjacent residential areas. On Easter bank holiday Monday I took a file of photographs that I have christened 'carmageddon' because of the presence of very large numbers of cars in every nook and cranny in the town, but have chosen not to submit that because it would not be representative.

21. So the photographic appendix instead records the number of cars parked around and beyond the Valley Road area on Thursday (market day) 16th April, that is to say before the start of the summer season. It can very easily be seen that parking spaces across the entire area are under substantial pressure. The inspector is requested to visit the town to inspect the balance between parking supply and demand on a Thursday market day, and also on one of the May bank holidays (4th or 25th). By doing so they will be able to make a judgement as to whether that balance is indeed 'on a knife's edge' or not, and what the consequences for economic viability might be if that balance is not just adversely disturbed but irretrievably lost, because once the Fire Station site is developed without parking there is no remedy available to restore that lost capacity. The inspector is therefore also requested to reach a judgement as to whether there is any other location in the town centre, and also specifically within the immediate area of the development site, where a new parking capacity could be provided.

22. In addition to an 'economic viability' test there is also a 'social amenity' one. The inspector should for example note that the development site is immediately adjacent to the Hebden Bridge Group Practice medical centre and that increased competition for parking spaces could result in difficulties being experienced by people needing to park next to that building. It is also the case that parking pressures immediately around the development site will ripple northwards into the residential areas further up Valley Road. The current amount of parking in those areas on a market day Thursday is recorded in the photographic appendix.

23. At this point the next and consequential test should be around the question: 'what will happen to traffic flows, and congestion, and potential road safety conflicts, as a result of this substantial loss of parking spaces focused in one area of the town centre where demand for parking is at the same time being increased by the development?' The Transport Statement acknowledges the existence of this issue at TS 5.1: '...it was suggested by members of Committee and objectors who spoke, that the closure of the temporary car park would contribute to the road safety concerns expressed within the reason for refusal.'

24. In consequence the Transport Statement undertook surveys of the balance between parking supply and demand that follow the format of those I undertook in 2007-8 (which provide my baseline for the parking stock total in paragraph 15 above). The results of the TS survey are presented in paragraphs 5.13-25 but it is important to understand that two strong caveats must be applied to their construction and interpretation. Firstly TS 5.25 states: 'In summary it is clear that *at the time that servicing will be taking place for the store*, there is significant spare capacity within the car parks and on street within the wider catchment considered and also in the immediate vicinity of the site.' *my emphasis* I understand this to mean that the Transport Statement is representing that the surveys demonstrate that between the hours 6-10am and 5-7pm there is parking spare capacity available elsewhere in the town. This is of course correct since the capacity typically only comes under pressure between approx 11am-3pm.

25. However that is not the proper test of the consequence of losing the 39 spaces at present available in the Fire Station site, because these will be lost permanently, at all times of day and especially when spaces are at a premium e.g over the middle of the day, on market days, summer weekends and bank holidays. My judgement is that the 5.25 definition of the test TS applies about the consequences for parking capacity of the loss of the application site is misleading.

26. (Since TS 5.21 - 'On a Thursday (Market day) the existing car parking stock within the immediate vicinity of the site is well utilised between 10.00 am and 3.30 pm, however even during this period, when the Market Place car park is closed at no stage did the survey find that demand outstripped supply.' - appears to argue contrary to my previous statement that 'This is of course correct since the capacity typically only comes under pressure between approx 11am-3pm' let me just point out that the half hourly surplus it is pointing to consists of just 14-1-3-4-6-8-6-10-10-12-14-21 vehicles respectively between 10am-3.30pm; see appendix SCW9-3 column four).

27. Secondly I would request the inspector to test the consequences of subtracting 39 spaces from the various 'shortfall/surplus' columns in appendix SCW9 which record the pre-and post positions for the town centre and then narrower Valley Road parking stock. (Additionally an allowance should also be made for 'maximum effective capacity' of a car park: this is more likely to be 90% rather than 100%.) It will be noted however that the post-scheme capacity is recorded as just 3 spaces less than the pre-scheme total; in other words the 39 spaces of the Fire Station site appear to have been withdrawn silently from the recorded measurement of pre-scheme total capacity. This treatment of the Fire Station car park capacity is only disclosed by its omission from the list of car parks to be surveyed contained in TS 5.9 resulting in its absence in the parking beat surveys e.g on page 63PDF of appendix SCW8. My judgement is that this omission renders the interpretation that the TS makes of the surveys in paragraphs 5.16-24 unreliable or invalid.

28. However the inspector can easily see in appendix SCW9 that, across the middle of the day, the TS surveys demonstrate that the loss of the 39 spaces in the Fire Station site results in a very significant shortfall in parking capacity. The inspector should note that furthermore the

Transport Statement does not identify this as an issue (so essentially is disguising it), or then comment on its implications for traffic flows, congestion, or potential road safety consequences. Its assertion instead is that the development 'will not have an adverse impact on car parking *which would have any impact on highway safety.*' *my emphasis* The TS has in fact simply disregarded or ignored the range of potential adverse consequences, and is therefore deficient. My submission however would be that there must be some considerable likelihood that there will be an increase in irregular parking and associated vehicle manoeuvres which must have a negative impact upon highway safety. The photographic appendix makes a number of references to these. There will also be an increase in traffic flows by vehicles circulating around the area in an unfulfilled and frustrated search for parking spaces.

29. In the absence of a Transport Statement that even acknowledges the potential for these impacts to occur it will be for the inspector to reach his own conclusions without the benefit of evidence from the appellant, but I believe it would be unsafe to ignore the consequences of the loss of these parking spaces within the determination of the application.

30. I understand that it is not the responsibility of the developer to provide parking spaces for Hebden Bridge town centre on a permanent basis. TS 5.2 comments on this point. The developers have a right to seek an appropriate development for their site. But the operative word in that sentence is 'appropriate'.

**C) consequently is it a reasonable position that 'No dedicated parking spaces are proposed for the Sainsbury's Local store, in view of its town centre location'? TS 2.5**

31. To continue that last point it is entirely reasonable to argue that the addition of an intensifying use at this particular location - although the applicant is denying that it is intensifying - makes it inappropriate. The impact of this intensification has then been worsened by the developer's decision that 'no dedicated parking spaces' are to be provided. Similarly they have decided themselves, as a development choice, that 'It would not be practical or desirable for delivery vehicles of this size to use the central courtyard behind the store off Regent Street, and it is therefore proposed that the store will be serviced from its frontage on Valley Road.' TS 2.13 (Apparently it is more 'practical and desirable' for delivery vehicles to be parked on Valley road, with all the goods being transferred across the pavement into the store by its southern door, thus inevitably causing either inconvenience or a temporary impediment to pedestrians.)

32. But if both of these facilities have been provided at the Mytholmroyd *Local* store (4 off-street parking spaces, and a dedicated off-street delivery bay) why does the same principle not apply in Hebden Bridge? The answer appears to be that the developer has *chosen* to use the remainder of the site behind the store - which could have been allocated to parking/deliveries - for some other use (in this case residential), probably to increase the financial yield from the site. It is of course quite usual for supermarkets to provide on-site private parking adjacent to their stores. Policy T18 provides for an exception within the town centre Exception for this to happen, and the 2007 permission renewal document gave the developer clear indication that this was an issue at this site. This then would have mitigated the problem being created by the loss of the 39 parking places on the Fire Station site.

**D) 'the existing use of the route by commercial vehicles is not resulting in any road safety issues' TS 1.11**

33. Please note that the wording of this statement relates to the *existing* use of the Valley Road area by HGVs, and not the situation created by a future Sainsbury's development. Similarly the Road Safety audit in section 4 confines itself to assessing whether there will be any safety impact arising from the delivery vehicles alone, rather than e.g future increased car traffic associated with the store (which is denied) or increased traffic circulation arising from the loss of parking spaces (which is ignored).

34. First it should be noted that the number of deliveries has increased from 5 in the original Sainsbury's transport statement to 7 (paragraph 2.17). What percentage increase does this represent of HGV traffic in the area? TS 3.4 states that "... between the hours of 7.00 am and 7.00 pm 45 vehicle class type OGV 1 and vehicle class type OGV 2 vehicles were observed

either entering or exiting Valley Road at the junction with St George's Street ..." The wording is unclear as to whether this is recording of movements of 45 individuated vehicles, or alternatively 45 entering or exit movements at the junction. If the former the 7 Sainsbury delivery movements a day would represent an increase of 16% over the baseline; if the latter an increase of 31%. The Inspector is requested to establish which is the case, but if it is the larger number this is a very significant increase which has not been adequately disclosed.

35. Furthermore, although I have not had sight of any proposed conditioning for the application, I doubt if setting a maximum number of deliveries per day can be required or enforced and therefore there is no certainty that the number of deliveries might not increase. This could be for a number of reasons but a particular circumstance in which it might occur would be at the introduction at a later date of a 'click and collect' service at the Hebden Bridge store. For example online orders would be picked at the Halifax superstore and then delivered at the Hebden Bridge local for subsequent collection. This would both increase the number of delivery vehicles and then in turn attract more shoppers' cars to the location who would seek a parking space. Only Sainsbury's will know whether it is within their future commercial strategy to introduce this service (and that is something they will not be able to guarantee to the appeal) but it is quite reasonable to ask whether this specific location and delivery method (through front of store) could cope with such a future possibility.

36. The proposal is that up to 11.2m length vehicles will be parked in a delivery bay in operation at certain times of the day on Valley Road; presumably they will be there for periods between 10-20 minutes. However the Transport Statement does not identify the width of the delivery vehicles because the test for the practicality of this proposal should be whether two-way traffic (including other HGVs) will continue to be able to pass along the road whilst the Sainsbury delivery vehicles are parked up. (And see the photo on page 13 of this submission) The inspector is requested to check against the DFT *Manual for Streets* whether this is possible. In my experience I have never seen an HGV parked in this location so can't judge what would occur if this occurred repeatedly on a daily basis. It is correct that as *TS 2.15* notes that 'There is already a loading bay in force on Valley Road at its junction with Moss Lane' but the amount of both vehicle and pedestrian traffic at that location is reduced, with less likelihood of conflicts between the two.

37. I also ask whether the proposal to make the loading bay operational only at certain times of the day *TS 2.9* is enforceable? If it isn't then delivery vehicles arriving at the location would not be able to access the bay and (working to a strict schedule) would be tempted to engage in irregular parking, or alternatively circulate around the loop until the bay became available. This would not be an easy manoeuvre and would add to traffic congestion. For example the photographic appendix records instances where the loading bay at the Mytholmroyd store was occupied by a parked car; also the bay will be directly located next to the market area and presumably market trader vehicles could also legitimately use it on Wednesdays/Thursdays e.g. during their setup period 6-10am.

38. Given the above I believe that the *TS 3.6* conclusion – 'Given the current level of goods vehicle usage on Valley Road it is clear that the servicing route to the site is already well used by commercial vehicles and that any servicing traffic associated with the Sainsbury's Local will therefore not have any impact on the free and safe passage of vehicles on Valley Road in the vicinity of the site. The previously approved permission would have resulted in exactly the same situation with servicing vehicles approaching the site on Valley Road and no concerns were raised in granting previous permission for redevelopment of the site' – contains both an invalid non sequitur in the second clause of its first sentence, and an invalid comparison in its second sentence due to the intensification of the retail operation that will occur compared to the 2007 permission.

### **Wider spatial issues**

39. Throughout this application process I have personally not taken a view on the direct impact of a Sainsbury's convenience store on the existing retail offer of Hebden bridge, because this is already highly specialised, and secondly because the amount of competition provided by a Sainsbury's Local is less than that from a medium or large supermarket and would more likely

impact on the two existing convenience stores on Crown Street (Oasis and One Stop). I would point out nonetheless that planning permission has already been granted by Calderdale Council for additional supermarket capacity for Hebden Bridge at a location (Mytholm site - development not started) where parking provision can and will be provided in a way which adds to, rather than subtracts from, the town's overall parking stock. Consequently the local planning authority has already met its obligations to provide additional and competing provision for food and other goods in what it regards as an appropriate location, and in a way which more appropriately balances the issues of retail competition & choice and its associated transport impacts for the town as a whole.

40. However I do think there is a very real possibility, and danger, of a substantial *indirect* impact upon the retail offer - not just confined to food stores in the same sector - as a result of the reduction to the town centre parking stock and then the knock-on highway impacts. I think it is easily understood that the disbenefit to the town as a whole would be much larger than the possible benefit of increased competition in the convenience sector between the three stores named. This damage would be permanent and intractable because it could not be remedied. I urge the inspector to reflect on this wider consequence.

41. Taking the overview, a planning permission has already been approved to expand both supermarket and parking capacity at the 'edge of town' to the west of Hebden, and there is a programme decision supported by Calderdale Council to expand parking capacity at the rail station 'edge of town' location to the east. Spatially these seem to me to be appropriate locations for this additional capacity *ceteris paribus*. But a proposal to expand supermarket capacity (albeit at a smaller scale) in the town centre, not just without additional parking provision, but actually reducing the town's stock significantly, seems to me to be inappropriate in the particular circumstances of Hebden Bridge, in that it could compromise the economic and retail viability of the town centre itself.

42. Secondly by potentially creating or increasing a traffic congestion 'bottleneck' at the beginning of Valley Road, the development could close off the potential for future redevelopment and regeneration further along its entire length including increased housing on brownfield sites in a sustainable location, and also in the immediate location (e.g the adjacent and underutilised BT telephone exchange site on Hangingroyd Lane). This ground for objection should not be overemphasised but rather questions whether the development site is an appropriate location for retail activity by a major national supermarket chain with its potential for further intensification. There is only a limited amount of highway capacity in the Valley Road/ Hangingroyd Lane area, which is not capable of any expansion: how therefore should it be allocated, and in support of what types of uses, in the present and for the future?

## Conclusions

43. The appeal Transport Statement has chosen to identify and address a very narrow definition of the highways and parking issues arising from this proposed development. Even in that situation it has not provided sufficient evidence to substantiate some of its central propositions. This has the effect of masking or concealing relevant highways and parking issues, which could then translate into specific safety conflict issues. Approval of this application would in fact result in proportionately large changes to the parking stock and also to the number of delivery vehicles around the application site.

44. In terms of the UDP policy requirements that should be applied:

- *T18 Maximum Parking Allowances*: the Exception for Town Centres specifically states: '... However in some circumstances, at the discretion of the Council, where it is considered that on-street parking problems will arise or that issues of Road safety may be compromised, then parking may be required'.

- *GT4 Hierarchy of consideration* refers to the principle of '... in any event ... not mak[ing] conditions worse for more vulnerable transport users'.

- *BE5 Design and layout of highways and accesses*: This requires that 'the design and layout of



highways and actresses should i) ensure the safe and free flow of traffic ... in the interests of highway safety

- *S2 Criteria for assessing retail developments* states in Part A ii) 'the development creates no unacceptable environmental, amenity, traffic, safety, or other problems'

- *GS1 Retail Strategy* states that 'As part of this strategy the vitality and viability of existing centres will be maintained to ensure that they remain attractive to shoppers and visitors and can compete effectively with other centres and other forms of retailing.' I believe this policy, with its reference to the 'viability of existing centres will be maintained' applies to the indirect consequences of parking stock reduction I refer to in paragraph 40 above.

45. I think it is reasonable to apply these various policy tests to the circumstances arising from this development which I have described. Furthermore I believe that insufficient evidence has been provided by the applicant that the development does comply with UDP policies relating to the avoidance of adverse traffic, parking and highway safety impacts. Instead the applicant simply asserts that the impacts consequent to the development will be minimal and acceptable. The evidence that I have submitted tends to disprove that position.

46. Consequently there are reasonable grounds for concluding that this development would be contrary to the existing UDP policies and should be refused.

47. If the appellant submits a rebuttal of this document I would request that I be allowed to comment on their arguments.

Anthony Rae

*22nd April 2015*

*21 Chapel Avenue, Hebden Bridge HX7 8DG*

**Photographic appendix: Thursday 16th April 2015**

**A) Car park at Mytholmroyd Local store**



*Photo 1378: Irregular parking at the Mytholmroyd Local store: car in loading bay - 5.24pm*



*Photo 1402: Irregular parking at the Mytholmroyd Local store: car encroaches on loading bay, driver waits in car on disabled bay(on right), when all four parking spaces are already occupied – 5.49pm*

*B) Parking in Hebden Bridge town centre – 12.20-50pm*

These photographs record the saturation of parked cars across a wide area around the application site, and the town centre itself, on an ordinary market day in April when the Market Place car park next to the application site is closed. They pose the question: what would happen to all these cars, and to ensuing traffic flows or congestion, if additionally the 39 spaces of the application site were to be lost? Where would they go? What would be the consequential economic and amenity impacts?



*Photo 1262: Fire Station site car park (application site)*



*Photo 1264: Regent St*



*Photo 1267: looking north down Valley Road, GP Practice on left. Irregular parking and HGV approaching*



*Photo 1268: Valley Road at application site. Q: How would this HGV pass a Sainsbury HGV in the loading bay at that location also allowing for oncoming traffic without being tempted to encroach on nearside pavement where there are shop entrances?*



*Photo 1282: Valley Road, GP Practice on right*



*Photo 1281: Greenwood St*



*Photo 1280: Greenwood St (vehicles on the right are not parked but are being serviced at a repair business)*



*Photo 1279: passage off Valley Road*





*Photo 1278: private parking off Valley Road*



*Photo 1277: Baker's St*



*Photo 1276: corner of Valley Road/Hangingroyd Lane*



*Photo 1274: Palestine Road, off Victoria Road*



*Photo 1273: Victoria Road*



*Photo 1271: far end of Victoria Road*



*Photo 1275: Foster Lane*



*Photo 1283: Hangingroyd Lane*



*Photo 1284: Regent St (residents parking zone area)*





*Photo 1287: Bond St*



*Photo 1285: Hangingroyd Lane. Market stalls can be seen in background on Market Place car park, and traders' vans in foreground.*



*Photo 1286: Hangingroyd Lane. Town Hall Extension on left occupies site of previous 'Town Hall' car park*



*Photo 1290: Lees Yard (St George's Sq) car park*



*Photo 1291: Garden St car park*



*Photo 1293: New Road car park*



*Photo 1296: Station Road car park. Although mostly occupied by rail users this is formally part of the town centre longstay parking stock. Photos of the station car park are not provided because it is 'rail users only' but it also was full.*



*Photo 1301: parking stretching along A646 from Station Road in the direction of Mytholmroyd. These vehicles will be a mixture of rail users overflowing from the station car park (see para.2 for proposals to extend this) and longstay users of the town centre such as employees.*