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Secretary of State for Transport  
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NE4 7AR

Our ref GGW/RMS/FIB.26-1

25 May 2017

Dear Sir/Madam

**City of Bradford Metropolitan District Council (A650 Hard Ings Road Improvement Scheme, Keighley) Compulsory Purchase order 2017**

**The Highways Act 1980 -and- The Acquisition of Land Act 1981**

**Our Client: Fibreline Limited, Victoria Park Mills, Hard Ings Road, BD21 3ND**

We refer to the above Compulsory Purchase Order ("**the Order**") and confirm that our client has an interest in Plot 12 described in the Notice of Making of the Compulsory Purchase Order ("**the Notice**") and Joint Statement of Reasons for making the Compulsory Purchase Order and Side Roads Order ("**statement of reasons**"). Plot 12 is described in the Notice as "941 square metres of private accesses and frontage grass verge of Fibreline Limited, Victoria Park Mills, lying to the north of the A650 Hard Ings Road, Keighley".

Our client objects to the Order on the following grounds: -

- 1 Fibreline raise objections to the proposed road widening scheme, which would have a significantly detrimental impact on the ability to operate from their business premises. The objectors reserve the right to supplement these objections and provide additional points in further detailed consultations and in any proof of evidence submitted in relation to any convened Public Inquiry.
- 2 Fibreline acquired their current property in 1989 and undertook substantial refurbishment and improvement works. The company has grown and now employs over 180 full-time staff and operates the factory/warehouse premises from Sunday 10pm to Friday 10pm on a 24 hour basis. Fibreline's main office sits adjacent to Hard Ings Road. The office block is single storey in construction and extends approximately 30 metres across the front elevation. In between the office building and the existing carriageway is a narrow buffer, with a stone wall and sloped grass verge. The office windows currently achieve adequate natural light. This grass verge is the land required for road widening and is the subject of the Compulsory Purchase Order, while the land hatched blue on plan ref: PTH/HS/103197/LAP-12B is also the subject of the Compulsory Purchase Order and is required for working space.
- 3 The proposed widening would necessitate the construction of a new retaining wall to the front of the office building and the loss of this grass verge. If the scheme was to proceed, the carriageway would then lie approximately 9 metres from the windows of the office building and the pavement/cycle

path 6 metres from the building. There are likely to be very significant affects on the usability of the office premises due to loss of light, noise, vibration, safety, security and general amenity concerns.

- 4 Appendix 3 in the statement of reasons is an Engineering Feature Plan showing the location of the proposed retaining wall, footpath and road. The scheme would result in the road moving 3 metres closer to the office windows, while creating a dual carriageway in this location. The resultant loss of amenity within the offices due to increased vibration, noise, loss of light, overbearing impact on amenity, safety and compromised security could render the only existing office space serving the business unusable, which could in turn threaten the entire Fibreline operation in Keighley.
- 5 The creation of a steep retaining wall outside the office window, with the relocated stone wall above, would invariably result in a reduction in the amount of natural light to these offices. There is presently a sloped grass verge which allows adequate levels of sunlight throughout the day. Removing this grass verge and replacing with a retaining wall much closer to the office block would impinge on the outlook of employees and presently enjoyed rights of light being diminished. These offices presently enjoy a partial outlook towards the road, albeit at a lower level. Any attempts to build a steep retaining wall closer to the offices would also have a deleterious effect on the outlook for occupants of these offices.
- 6 The objectives of the road widening scheme are to improve traffic flows and reduce traffic congestion on the A650 and in Keighley town centre. The consequences of increased traffic flows would be more frequent and faster moving vehicles across 4 lanes of traffic and a potential increase in noise and disturbance from these vehicles. Fibreline operate the only business with an office fronting Hard Ings Road. Employees work in these offices for over 10 hours a day (08.00-18.00). 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.
- 7 Our clients object to the principle of the A650 Hard Ings Road Improvements Scheme, which is not justified. Traffic data collected between 2000 and 2015 shows that the Annual Average Daily Traffic (AADT) on Hard Ings Road has not significantly increased and carried some 29,000 vehicles a day in 2015. At the time of the previous scheme to widen the A650 Hard Ings Road in 1996, the AADT was 26,000 vehicles a day. The increase of 3,000 vehicles over a 19 year period is much lower than predicted in the 1996 forecasts, which anticipated an increase from 26,000 to 46,000 over the 20 year period. Similarly, traffic data forecasts for the current scheme predict an increase of 3,200 vehicles over the period modelled from 2017 to 2026 to 34,237 vehicles. The historical traffic data does not support these anticipated increases in traffic.
- 8 Finally, the statement of reasons indicates the alternative options which have been considered. All of the alternative options proposed the dualling of the A650 Hard Ings Road to provide 4 lanes. There were no alternative options for retaining and improving two lanes and improving the Beechcliffe and Bradford Road Roundabouts. The Department for Transport Advice Note TA79/99 'Traffic Capacity of Urban Roads' provides guidance on the maximum hourly flows that typical urban roads can carry. This note advises that a road of a similar width and character to Hard Ings Road can carry some 2,500 vehicles per hour two-way. The data provided by Axis Property Consultancy to our clients in support of the road widening scheme forecasts an increase in morning peak hour (08.00-09.00) traffic flows from 2,189 vehicles (2017 model) to 2,418 vehicles (2026 model). Provided there were improvements to the two roundabouts, the existing 2 lane Hard Ings Road could have sufficient highway capacity to accommodate anticipated morning peak hour flows. All alternative options, including the option to improve the roundabouts without fully widening Hard Ings Road, should be subject to examination to determine whether they could achieve the same or similar objectives as the proposed scheme with less impacts.

We look forward to receiving acknowledgement of receipt of our client's objection in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'A. Walker', written in a cursive style.

**WALKER MORRIS LLP**