

**THE CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL (HARROGATE ROAD/NEW LINE JUNCTION IMPROVEMENTS) (SIDE ROADS) ORDER 2017**

**THE CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL (HARROGATE ROAD/NEW LINE JUNCTION IMPROVEMENT SCHEME) COMPULSORY PURCHASE ORDER 2017**

**THE HIGHWAYS ACT 1980**

**-and-**

**THE ACQUISITION OF LAND ACT 1981**

**THE HIGHWAYS (INQUIRIES PROCEDURE) RULES 1994**

**COMPULSORY PURCHASE (INQUIRIES PROCEDURE) RULES 2007**

**National Transport Casework Team (REFERENCE: NATTRAN/YH/LAO/149)**

**in the matter of**

**a highway improvement scheme involving highway alterations to improve and widen the A658 Harrogate Road from a point 70 metres north east of its junction with Carr Bottom Road, south westwards to a point 25 metres south west of its junction with Stanley Street and the A657 New Line from a point 45 metres north west of its junction with Haigh Hall Road, south eastwards to its junction with Elder Street, Bradford and a new 60 metres long one-way link road between Harrogate Road and New Line, Bradford in the County of West Yorkshire**

**Proof of Evidence**

**of**

**Ben McCormac BEng (Hons) Civil Engineering**

**Programme Manager WY+TF Schemes**

**(Document Reference: P01/BMC/General Overview)**

**presented as evidence in chief on behalf of**

**The City of Bradford Metropolitan District Council**

**to**

**Local Public Inquiry – 6<sup>th</sup> November 2018**

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**1 Personal Details**

1.1 My name is (Ben McCormac) and I hold the position of (WY+TF Programme Manager for CBMDC.) I have (a BEng (Hons) in Civil Engineering. I have (over 18 years of experience covering, Rail, Water and Highways Projects. I have held Programme Management positions for over 6 years. My skills focus on delivery, finance, risk and Client Liaison.

**2 Scope of Evidence**

2.1 *I will be covering the general concept of the scheme, drivers and expected outputs, historical decisions and approvals / permissions.*

2.2 I will cover objections raised, evidence to be provided and make reference to specific individuals appointed as expert witnesses, these being :-

| <u>Name.</u>     | <u>Area of Expertise.</u>     | <u>Proof Reference.</u>      |
|------------------|-------------------------------|------------------------------|
| Mark Baker       | - Design & Engineering matter | - P02/MB/Design& Engineering |
| Ben Marchant     | - Planning                    | - P03/BM/ Planning           |
| Kate Okell       | - Land and Property           | - P04/KO/Land and Property   |
| Dave Haskins     | - Funding Statement           | - P05/DH/Funding Statement   |
| Sally jones      | - Air Quality                 | - P06/SJ/Air Quality         |
| Brian Fairclough | - Noise                       | - P07/BF/Noise               |
| Andrew Bradshaw  | - Transport Modelling         | - P08/AB/Transport Modelling |

**3. Basic Description of the Scheme & Key Objectives / Outputs.**

**3.1 General.**

The Council is seeking to promote an extensive highway improvement scheme comprising proposals for an improved Harrogate Road/New Line road junction (“Junction”) which is designed to improve traffic flows, reduce traffic congestion and improve the safety aspects of the junction. New cycling and pedestrian facilities will be provided as part of the Scheme to try and encourage the use of sustainable modes for local journeys.

3.1.1 The A657 and A658 form part of two strategically important commuter routes within Bradford's transport network. On an average weekday, these routes carry approximately 38,000 vehicles and converge at the Junction, whose capacity is insufficient to accommodate the substantial volumes of traffic at peak hours. At peak times considerable congestion is evident and long delays make them less attractive for businesses.

- 3.1.2 The A658 Harrogate Road/A657 New line is a major pinch point on the districts strategic road network and the lack of capacity at the junction results in considerable queuing at peak times on all four approaches. The A657 provides access from Keighley, Shipley and Bingley into Leeds and the A658 links Bradford with Leeds Bradford Airport and Harrogate. Both are key commuter routes and carry significant volumes of traffic with as indicated approximately 38,000 vehicles using the Junction each day. There are no dedicated pedestrian facilities at the Junction despite the close proximity of Greengates Primary School, and retail units sited within 100 metres. The Scheme is located at the existing junction of Harrogate Road/New Line, Bradford which is an important junction that forms part of primary route network providing strategic links between Shipley to Leeds and Bradford to Harrogate. Harrogate Road provides access to Leeds Bradford Airport and the new Apperley Bridge railway station (opened in December 2015), which are located 5km and 1km to the northeast respectively. The Scheme will increase the number of traffic lanes on all arms of the junction, introducing controlled pedestrian crossing facilities, new cycle lanes, landscaping works and the construction of structures and retaining walls to accommodate the Scheme. Additionally, a new one-way road link will form a p-loop junction (“P-Loop Junction”) to facilitate right and left turning movements from Harrogate Road to New Line.
- 3.1.3 This Scheme has been a longstanding aspiration of the Council for over twenty years and will address several issues at this junction, including traffic congestion which causes long delays to travel between Bradford, Leeds, Airedale and Leeds Bradford Airport. It will also address the lack of cycle lanes and controlled pedestrian crossing facilities at this location.
- 3.1.4 A number of options were considered during the early development. The preferred option reflected in the Orders was considered to be the most efficient in terms of meeting scheme outputs whilst minimising the amount of land take required. Notwithstanding this, there was still a requirement to implement a CPO / SRO as the Scheme requires widening of the existing highway into land currently owned by the Council and private landowners. Land is also being acquired at New Line Retail Park (“NLRP”) to mitigate the loss of customer car parking created through the acquisition of frontage land.
- 3.1.5 In order to establish the most appropriate solution specifically with reference to the “NLRP”, Axis LLP were instructed to undertake an Options Appraisal in connection with the proposed acquisition of land at New Line Retail Park (“NLRP”), Bradford for the purposes of a proposed junction improvement scheme in January 2017.

Please refer to the Statement of Case (see Core Document 1, Appendix 9) for further information.

- 3.1.6 CPO/SRO - On the 24th January 2018 both the CPO and SRO (see Core Documents 21.1.15 & 21.1.17 respectively) were submitted to the Secretary of State (“SOS”) for Transport for confirmation and which if confirmed, will enable the Council to rely on the use of compulsory purchase powers if necessary.

3.1.7 *Expiry date for objections to the orders to be sent to the “SOS” were –*

1) Friday 23rd February for the Compulsory Purchase Order.

2) Friday 9th March 2018 for Side Roads Order.

3.1.8 Seven objections were received within the statutory objection periods. A status update is provided in section 7.

## **3.2 Design.**

3.2.1 The Scheme is designed to improve traffic flows and reduce traffic congestion along the Junction corridors. Air quality and highway safety will also be improved and the local environment will be enhanced through the use of high quality materials in the design of the Scheme. Where feasible, new cycle lanes and pedestrian facilities will be provided to encourage the use of sustainable modes for local journeys.

3.2.2 It will be necessary to relocate five existing bus stops/shelters. Consultations have been made and adjustments to the bus stop arrangements have been agreed with the West Yorkshire Combined Authority (“WYCA”), who own the bus shelters and have a licence from the Council, in its separate capacity as local Highway Authority, to provide bus stops/shelters.

3.2.3 In designing the geometric layout of the Scheme, the Council has had regard to the guidance contained in the design standards and advice notes contained in the Government’s “Design Manual for Road and Bridges” (see Core Document 21.1.20), relating principally to motorway and all-purpose trunk roads and where applicable has applied the same desirable high design standards to the Scheme.

Please refer to the ‘Design and Engineering Proof’ (see Proof P02/MB/Design & Engineering) for further information.

## **3.3 Objectives/Benefits.**

3.3.1 The objectives of the West Yorkshire Plus Transport Fund and also those of the West Yorkshire Transport Strategy 2040 (adopted 3<sup>rd</sup> August 2017), include supporting economic growth and improved quality of life through safer walking, cycling and reduced air pollution. The Scheme fulfils these objectives by introducing where feasible, cycle lanes and pedestrian crossings under signal control and increasing traffic throughput without having an overall detrimental effect on air quality.

Please refer to ‘Air Quality Proof’ (see Proof P06/SJ/Air Quality) for further detail.

### **3.4 The Primary key Scheme benefits are:-**

- 3.4.1 Reduced congestion at the Junction leading to anticipated reductions in vehicle delays.  
Increased safety provision for cyclists and pedestrians through provision of cycle lanes and dedicated controlled pedestrian crossing facilities on all arms of the Junction.

### **3.5 The secondary benefits of the scheme include: –**

*Supporting proposed housing developments in the area (see below) (see Core Document 21.1.50);*

- 3.5.1 *Construction of 267 dwellings and integral public open space, with associated access, parking and landscaping - Land At Simpsons Green, Apperley Road.*
- 3.5.2 *Erection of 45 dwellings with associated access and infrastructure (building to be demolished) - Sports Ground, Harrogate Road (adjacent to canal).*
- 3.5.3 *Outline planning permission for the construction of up to 130 residential dwellings with associated access – Land between Harrogate Road and Carr Bottom Road.*
- 3.5.4 *Hybrid application for up to 220 dwellings with full permission for 60 dwellings, with partial means of access and open space included within the outline - Land At Cote Farm, Leeds Road, Thackley.*
- 3.5.5 Outline application for residential (C3) use for up to 600 dwellings including detailed means of access with ancillary local centre (Uses A1 to A5 up to 2000 sq m gross), demolition of onsite buildings, a nursery (D1 Use) and fixed surface infrastructure associated with existing uses. - Fagley Quarry, Fagley Lane.
- 3.5.6 BPL House, Harrogate Road - 80 dwellings.

Please refer to paragraph 4.34 of the 'Planning Proof' (see Proof P03/BM/ Planning) for further detail.

### **3.6 Noise.**

- 3.6.1 The Council has also undertaken an operational noise assessment to understand the projected impacts of the Scheme on the surrounding area. In summary, the noise impact of the Scheme will be more noticeable in the short term, whereas the long-term impact will lessen over time.

Please refer to the 'Noise Proof' (see Proof P07/BF/Noise) for further information.

**3.7 The Scheme also supports the West Yorkshire Transport Strategy 2040 (adopted 3<sup>rd</sup> August 2017) (see Core Document 21.1.46).**

3.7.1 Economy – improving connectivity to support economic activity and growth in West Yorkshire.

3.7.2 Low Carbon – to make sustainable progress towards a low carbon sustainable transport system for West Yorkshire.

3.7.3 Quality of Life – to enhance the quality of life of people living, working in and visiting West Yorkshire.  
Please refer to paragraph 4.30 and 4.31 of the ‘Planning proof’ (see Proof P03/BM/ Planning) for further information.

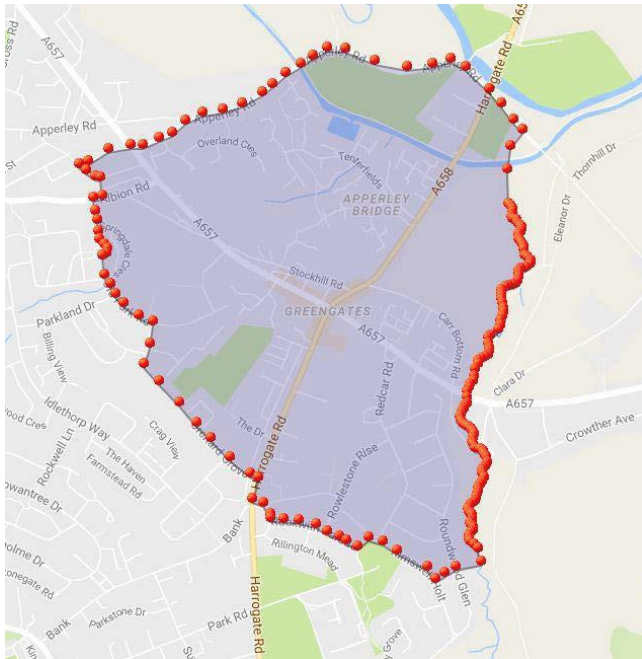
**3.8 Development of the Scheme and Consultations.**

3.8.1 The Council has carried out a robust and extensive public consultation exercise (see Core Document 21.1.39). Precise details were provided as to why certain aspects of the Scheme design were being considered and stakeholders, affected parties, local residents and businesses were asked for their comments with the opportunity being given for affected parties to make representations. The consultation ran from the 30th August 2016 until the 23rd September 2016. A key priority of the consultation was to actively engage with residents and businesses within close proximity to the proposed Scheme.

3.8.2 A range of communication methods were used to provide information about the proposals and ensure that people had the opportunity to offer their feedback on the proposals. Briefing packs were sent to MPs, MEPs and 89 political representatives for the Council including Council Ward Members.

3.8.3 Consultation leaflets were delivered to approximately 2,225 key stakeholders, residential and business properties. The leaflet distribution area that was chosen, included properties that would be directly affected by these proposals.

### 3.8.4 Leaflet distribution area.



- 3.8.5 The briefing pack/leaflet included details about the dedicated consultation website, project email address and telephone information line. There was also information included regarding the consultation exhibition/drop-in session. The Scheme is located near the Leeds Council Ward of Calverley & Farsley. The City of Leeds Council Leader and elected Ward Councillors were also consulted by letter and also electronically. Feedback and responses can be found in Appendix 5 – Key Stakeholder Responses of core document 21.1.39.
- 3.8.6 To engage a wider audience beyond those who lived within the leaflet distribution area, a press release was issued to seven local news outlets.
- 3.8.7 An advert was published in the Bradford Telegraph and Argus on 30th August 2016, to give as many interested parties as possible the opportunity to engage with the consultation process. 30 community access points were located both inside and outside the consultation leaflet distribution area to provide wider access to the consultation materials. These were located at local shops, amenities and other key locations including bus/railway stations and libraries, where the public could easily obtain copies of the consultation leaflet.
- 3.8.8 An exhibition/drop-in session was held at Albion Mills Business Centre (Bizspace), Albion Road on the 15th September 2016 and gave the public and stakeholders an opportunity to view plans and discuss the proposals with the Scheme project team. 148 people attended and in principle, the over-riding thought was that the Scheme is needed and is well supported.



- 3.8.9 The total number of feedback correspondences received from all consultations was 218 which included 43 feedback forms that were submitted at the exhibition/drop-in session. Within the feedback received throughout the consultation process, support was shown for the Scheme, with 29% of respondents strongly supporting and 33% supporting the proposals. 8% of respondents strongly opposed and 12% opposed the proposals.
- 3.8.10 Positive comments were received regarding the plans to reduce congestion, the provisions to improve safety on the roads and the associated landscaping proposals.
- 3.8.11 All feedback received during the consultation has been considered by the project team during the finalisation of the Scheme and this resulted in some minor amendments to the Scheme design by altering the engineering highway design to provide additional on-street car parking spaces for limited times of parking.
- 3.8.12 These consultations enabled feedback, comments and views from the public and other stakeholders to be taken into consideration with modifications to the design being made where possible.
- 3.8.13 Numerous meetings have and are continuing to be held with interested parties in an endeavour to acquire wherever possible all the land and rights needed for the Scheme in advance of the Council being authorised to seek to rely on the use of compulsory purchase powers as a last resort to achieve the desired objectives and these negotiations will continue throughout the compulsory purchase process.

Please refer to core document '21.1.39' for further information.

### **3.9 Approvals / Funding / Programme**

- 3.9.1 The Scheme has been accepted as a qualifying scheme and prioritised by WYCA in consideration of the schemes economic impact within the WY+TF programme. Initially, a long list of 120 projects was reduced into a medium list of 60. The prioritised package included 33 projects and the Scheme was ranked at 25 based on the schemes ability to deliver GVA (Gross Value Added) uplift per £1 of whole life costs across West Yorkshire. The Scheme has been developed and received Development Approval (Outline Business Case) of the WYCA assurance framework governance process in May 2014 (see Core Document 21.1.22). 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.
- 3.9.2 The total cost of the Scheme is estimated to be in the region of £11.43M and is to be met from a combination of funding supported by WYCA, CBMDC and S.106 commuted sum payments.

3.9.3 Cost Breakdown as follows;

|  |                       |          |
|--|-----------------------|----------|
| <b>Scheme Title:- Harrogate Road - New Line</b>                      |                       |          |
| <b>P-Loop Junction Improvement</b>                                   |                       |          |
| <b>Budget Estimate Summary - September 2018</b>                      |                       |          |
| <b>Description</b>   | <b>Cost (£)</b>       |          |
| <b>Works Total</b>   | <b>£3,683,043.41</b>  | <b>A</b> |
| <b>Land Acquisition (Estimated land costs including CPO process)</b> | £3,580,000.00         |          |
| <b>Statutory Undertakers</b>   | £1,400,000.00         |          |
| <b>Land and Stats Total</b>  | <b>£4,980,000.00</b>  | <b>B</b> |
| <b>Design Development</b>  | <b>£1,726,000.00</b>  | <b>C</b> |
| <b>Total Cost (A+B+C)</b>  | <b>£10,389,043.41</b> | <b>D</b> |
| <b>Risk (10% of D)</b>   | <b>£1,038,904.34</b>  | <b>E</b> |
| <b>Estimated Scheme Total (D+E)</b>                                  | <b>£11,427,947.75</b> | <b>F</b> |

Please refer to 'Funding Statement proof' (see Proof P05/DH/Funding Statement) for further information.

3.9.4 Going forward, continuing under the WYCA assurance framework process (see Core Document 21.1.61), the Scheme will need to achieve Full Business Case approval at Decision Point 4 and Full Business Case with detailed Costs at Decision Point 5. These additional approval stages will allow for further evaluation of the scheme to ensure it is still programmed to deliver economic growth benefits, address identified congestion issues and continues to offer value for money.

3.9.5 The scheme is expected to achieve Full business Case Approval by June 2019, with Full Business Case + Costs by October 2019. Start of construction works is expected in November 2019 with a projected completion date of November 2020.

#### **4.0 A brief history of the proposals and selected option.**

4.1 A coarse analysis in 2014 of the known potential solutions was undertaken specifically to identify the numbers of traffic lanes required to provide for predicted demand in 2026 (10 years after predicted opening). This approach was chosen to quickly identify the extent of the land required and any associated property issues.

4.2 Continuing assessment work identified that there were two clear options which could provide for the predicted 2026 demand; a 'P-Loop Junction' layout with extended lanes, and a Controlled Crossroads layout with extended lanes. Both showed significant benefits and appeared to address the existing capacity issues. There was very little difference in the offer between the two, although a 'P-Loop Junction' did have some detriment for vehicles turning right from Harrogate Road (south) as they would have to use the 'P-Loop Junction' route.

4.3 A controlled crossroads layout with extended lanes did however have a significant effect in terms of additional land taken. The layout required demolition of property at the south east corner and would significantly impact on the recently completed Farmfoods Supermarkets store development at the north-west corner. In contrast the 'P-Loop Junction' layout with extended lanes avoided both these sites making better use of land already in ownership of the Council.

4.4 In further seeking to reduce land and property acquisition, an optimised 'P-Loop Junction' layout was produced and modelled.

Please refer to the 'Transport Modelling Proof' (see Proof P08/AB/Transport Modelling) for further information.

In terms of design, it significantly reduced the impact on the New Line Retail Park with the expectation that it should minimise impact on the retail provision, subject to further careful detailed design and successful negotiation with the owners. The optimised 'P-Loop Junction' layout design involves the introduction of reduced length lane merges and divergences. These have been incorporated within this design in the knowledge that similar reduced standards operate successfully elsewhere across Bradford District.

4.5 Taking into account the above statements, the 'P-Loop Junction', became the preferred option. The 'P-Loop Junction' proposal has undergone a number of iterations since its conception in seeking to reduce the amount of land required whilst allowing the P-loop Junction to operate efficiently.

## **5.0 Council procedures: Main decisions made by the Council**

5.1 On the 1st December 2015, the Council acting in its separate capacity as a highway Authority resolved to promote a compulsory purchase order and a side roads order to facilitate the proposed road widening highway improvement scheme and associated highway alterations (see Core Document 21.1.9 & 21.1.10). As a consequence of further public consultation and a review of the engineering and design features, a decision was taken by the Council's Executive on the 7th March 2017 to modify the scheme, this involved the provision of additional parking at the proposed Farm Foods entrance (off Harrogate Rd) and removing the provision of existing parking on the main approaches so as to ensure the proposed junction design operates as planned (see Core Document 21.1.13 & 21.1.14). The Council therefore subsequently proceeded on the 19th December 2017 to make the "The City of Bradford Metropolitan District Council (Harrogate Road/New Line Junction Improvements) (Side Roads) Order 2017" (see Core Document 21.1.17) under sections 14 and 125 of the Highways Act 1980 and on the 21st December 2017 made the "The City of Bradford Metropolitan District Council (Harrogate Road/New Line Junction Improvement Scheme) Compulsory Purchase Order 2017" (see Core Document 21.1.15) under Sections 239, 240, 246, 250 and 260 of the Highways Act 1980.

5.2 In addition to the above, planning permissions are required for parts of the scheme, such as the P-Loop and new access into Farm Foods (see Core Document 21.1.51). There are also two Listed Building Consents (LBC's) required (see Core Document 21.1.53). Planning permissions and consents have all been granted in 2017.

5.3 All works not covered by the relevant planning permissions are covered under permitted development, as such there are no other issues which could give rise to a planning impediment.

Please refer to the 'Planning Proof' (see Proof P03/BM/ Planning) for further detail.

## **6. Human Rights.**

6.1 The Council have acted in accordance with the relevant, laws, Acts and Procedures when considering the Design of the proposed scheme.

Please refer to Paragraph 26 of the Statement of Case, Core Document number 1.

## **7. Public Sector Equality Statement.**

7.1 In formulating and promoting the Orders, the Council has had regard to its statutory duties and obligations under the Equality Act 2010 and in particular, to its obligations under sections 149 and 150 of the said Act.

7.2 An initial "Equalities Impact Assessment" was undertaken in December 2014, the results of which stated that the Scheme will have no negative impact upon any protected groups.

7.3 Section 6 of the Human Rights Act 1998 prohibits authorities from acting in a way that is incompatible with the European Convention of Human Rights and Fundamental Freedoms 1950 ('the Convention'). Various convention rights may be affected by the process of making and considering the CPO Order including those under Articles 6, 8 and 14 of the Convention and Article 1 of the First Protocol. Each of these rights are qualified rights and may be interfered with provided such interference is prescribed by law, is pursuant to a legitimate aim, is necessary in a democratic society and is proportionate.

7.4 The Council is conscious of the need to strike a balance between the right of the individual and the interest of the public. With reference to paragraphs 7.1, 7.2 & 7.3, the Council believes this scheme is compliant and although a degree of interference is expected, the benefits generated in the public interest warrants the proposed action.

Please refer to Section 26 of the 'Statement of Case', Core Document number 1.

## **8. Land Schedule – Scheme Land Ownership**

8.1 The CPO Order Land is predominantly used for commercial and residential purposes. Specifically, the various land uses in the area can generally be described as follows:-

8.1.1 Harrogate Road – land to the southeast and southwest - comprises a number of Retail properties, some of which contain upper floor residential accommodation and one of which is a large supermarket with car park. There is also a fast food restaurant.

8.1.2 Harrogate Road – land to the northeast - comprises an area which has been cleared of buildings, laid to lawn and used as a temporary permitted community garden. Slightly north of this is "Greengates House", a Grade II listed office building with adjoining residential premises and rear car park.

- 8.1.3 Harrogate Road – land to the northwest - comprises a listed Grade II War Memorial (with associated gardens), a restaurant, retail properties and a private hospital with car park.
- 8.1.4 New Line – land to the southeast - comprises predominantly residential dwellings with associated front gardens. There is also a large car park (accessed via Harrogate Road) which serves a modern retail/leisure development and further retail premises.
- 8.1.5 New Line – land to the northeast – comprises a parade of retail properties with frontage car park.
- 8.1.6 New Line – land to the northwest comprises a former school building which has been converted into commercial offices.
- 8.1.7 New Line – Land to the southwest - comprises part of the car park (which serves Farmfoods Supermarket) and New Line Retail Park, a parade of two storey commercial units which are occupied by retailers including a veterinary practice, chemist, education centre, food outlets, and a restaurant. There is also a Nursery with frontage car park.
- 8.1.8 The purported ownership of the CPO Order Land is described and set out in the CPO Order Schedule. The CPO Order Land consists of land in third party ownership and occupation together with some unregistered land and land already in the ownership of the Council. The main plots are described in document 21.1.15 of the supporting documents bundle – CPO Schedule.

Please refer to 'Appendix 1 – General Overview Plot Usage & Description' of this Proof for a schedule identifying plot reference, brief details, identified land use and current status of negotiations.

## **9. Objections – Main Points of Objection & Responses**

- 9.1.1 Objection 1 – St Paul's Investment – Will be WITHDRAWN (awaiting formal agreement, but settlement agreed in principle).
- 9.1.2 Objection 2 – Optegra eye hospital – Objection Live agreement, but settlement agreed in principle).
- 9.1.3 Objection 3 – Mr Srinivason – Subway – Objection Live.
- 9.1.4 Objection 4 – Ladbrokes / Coral Bookmakers – Objection Live
- 9.1.5 Objection 5 – Wilkinson Greengate Properties – Objection WITHDRAWN
- 9.1.6 Objection 6 – Mr & Mrs Lock – 140 New Line – Objection WITHDRAWN
- 9.1.7 Objection 7 – Nothern Power Grid – Objection WITHDRAWN.

## 9.2 Current status of Live Objections:-

### 9.2.1 Objection 2 – Optegra eye hospital – grounds of objection as follows:-

Unacceptable impact on the hospital and its vulnerable patients.

Impact on car parking provision and consideration required as to how loss can be replaced.

Temporary land requirements will lead to further loss of parking space; this should be avoided.

Impact on sensitive equipment from dust and vibration.

Lack of attempts to acquire by agreement in respect of the CPO.

Dialogue is on-going, responses to formal objections can be explained further by Mark Baker (Design) (see Proof P02/MB/Design & Engineering, Para 13.2.0), Kate Okell (Land) (see Proof P04/KO/Land and Property, Para 6.14)

### 9.2.2 Objection 3 – Mr Srinivason – Subway, grounds of objection as follows:-

Loss of parking frontage

Replacement parking spaces in a more remote place

Impact on shop operations/impact on business

Congestion in the car park

Impact on frontage elegance of the shops

Dialogue is on-going, responses to formal objections can be explained further by Mark Baker (Design) (see Proof P02/MB/Design & Engineering, Para 13.3.0) and Kate Okell (Land) (see Proof P04/KO/Land and Property, Para 6.33)

9.2.3 Objection 4 – Ladbrokes / Coral Bookmakers – grounds of objection as follows:-

Need for the unit; acquisition is not in the public interest

*Justification for re-revised entrance to Farmfoods and other options should be considered to facilitate the scheme.*

Dialogue is on-going, responses to formal objections can be explained further by Mark Baker (Design) (see Proof P02/MB/Design & Engineering, Para 13.4), Kate Okell (Land) (see Proof P04/KO/Land and Property, Para 6.51) and Andrew Bradshaw (Fore Consulting) (see Proof P08/AB/Transport Modelling, Para 8)

**10. Conclusions**

10.1 In summary, I am of the view that I have advanced a compelling case to justify the Orders being confirmed in the public interest to ensure that the Council, acting on its behalf, will be able to use compulsory purchase powers, should the use of such powers be required as a last resort, to acquire for the purposes of the Orders, all the land and rights needed to promote, deliver and facilitate the proper construction to improve and widen the A658 Harrogate Road from a point 70 metres north east of its junction with Carr Bottom Road, south westwards to a point 25 metres south west of its junction with Stanley Street and the A657 New Line from a point 45 metres north west of its junction with Haigh Hall Road, south eastwards to its junction with Elder Street, Bradford and a new 60 metres long one-way link road between Harrogate Road and New Line, Bradford in the County of West Yorkshire”

10.2 **Expert Declaration**

I confirm that my duty to the Inquiry as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively and that I will continue to comply with that duty.

I confirm that my expert evidence includes all facts which I regard as being relevant to the opinions I have expressed and that attention has been drawn to any matter that would affect the validity of those opinions.

I am not instructed under any conditional fee arrangement and have no conflict of interest.

I confirm that I have made clear which facts and matters referred to in this proof of evidence 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 and complete professional opinions on the matters to which they refer.

Dated 11<sup>th</sup> October 2018