

**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

Mark Baker

Senior Engineer, City of Bradford Metropolitan District Council

(Document Reference: P02/MB/Design & Engineering)

**presented as evidence in chief on behalf of
The City of Bradford Metropolitan District Council**

to

Local Public Inquiry – 6th November 2018

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Appendix 1 – New Line Retail Park replacement parking proposals – Drawing reference P/PTH/MH/103196/LA-27B

1.0 Personal Details

1.1 My name is Mark Baker and I hold the position of Senior Engineer with Bradford Metropolitan District Council. I have a HNC in Civil Engineering and 28 years' experience in the development, design and construction of highway improvement schemes for local authorities and government bodies.

2.0 Scope of Evidence

2.1 I have been instructed by The City of Bradford Metropolitan District Council (CBMDC) to provide evidence in respect of the proposed compulsory purchase of land under The City Of Bradford District Council (Harrogate Road/New Line Junction Improvements) (Side Roads) Order 2017 (the 'SRO') (see Core Document 21.1.17) and The City Of Bradford Metropolitan District Council (Harrogate Road/New Line Junction Improvements) Compulsory Purchase Order 2017 (the 'CPO') (see Core Document 21.1.15).

2.2 My evidence concerns scheme engineering matters arising from the proposed Harrogate Road/New Line improvement scheme (the 'Scheme'). Evidence dealing with other issues raised by objectors specifically in relation to policy and justification, land matters and funding has been dealt with by other witnesses for CBMDC within their own Proofs of Evidence.

3.0 Scheme Engineering

The Scheme will involve major civil engineering works, including -

3.1.1.1 Substantial widening of the existing highway on all four arms of the Junction.

3.1.2 Replacement and upgrading of the Junction traffic signals.

3.1.3 'P-Loop Junction', a new length of highway that would facilitate left and right vehicle turning manoeuvres from Harrogate Road.

3.1.4 Improvements to facilities for pedestrians including the provision of pedestrian controlled crossings and central pedestrian islands.

3.1.5 Improvements to facilities for cyclists including the introduction of cycle lanes and advance stop lines at traffic signals.

3.2 Demolition of 3no properties, namely, a currently vacant privately owned retail unit located at 911 Harrogate rd, a retail unit with flat above currently owned by CBMDC at 913 Harrogate rd, and 1 privately owned retail unit, Unit 4, No 70, New Line retail park, A657 New Line.

3.3 Demolition and reconstruction on new set back alignments of retaining wall features adjacent to the A657 to the southern boundary of property occupied by QRI and to the northern boundary of property occupied by Farmfoods

3.4 Closure of existing Farmfoods Supermarket's store highway access and construction of a new access.

- 3.5 Accommodation works to affected land and properties as shown on drg P/PTH/MH/103196/CPO-8A - contained in Core document 1, Appendix 4.
- 3.6 New and replacement planting and landscaping in multiple locations as shown on drg P/PTH/MH/103196/CPO-8A - contained in Core document 1, Appendix 4.
- 3.7 Road lighting improvements.
- 3.8 Relocation of five bus stops.
- 3.9 Reconstruction and extension of an existing watercourse culvert running north from a drainage channel under the eastern boundary of 804 New Line, under the A657 New Line and emerging into an open drainage ditch adjacent to the western boundary of property occupied by ASDA.
- 3.10 Significant diversions of statutory undertaker's plant and services.
- 3.12 A description of the scheme concepts and the key objectives that the proposals seek to address are discussed in section 2 of the evidence presented by Ben McCormac (see Proof P01/BMC/General Overview).
- 3.13 In developing the Scheme, a number of options were considered including a "do-nothing option" (as existing), pedestrian facilities option (as existing with pedestrian facilities), traditional crossroads and the 'P-Loop Junction', the preferred option. The 'P-Loop Junction' proposal has undergone a number of iterations in seeking to reduce the amount of land required whilst allowing the junction to operate efficiently.
- 3.14 The Scheme requires widening of the existing highway into land currently owned by the Council and private landowners.
- 3.15 The western approach to the junction of New Line will be widened on both sides, but primarily on its south side, where the proposed road widening will begin to taper at the car park of Sunnyside Nursery off New Line into the car park of New Line Retail Park and into a straight section of land owned by the Council and previously set-aside by Farmfoods Supermarket, off Harrogate Road for a road improvement. The north side of the junction will be widened into land set-aside by QRI Ltd (a local fashion Company) for the road improvement and into the landscaped garden of a War Memorial, comprising land in the ownership of the Council.
- 3.16 Starting at No. 150 New Line, the eastern approach to the junction of New Line will be widened primarily on the south side into the front gardens of terraced properties, semi-detached property and a detached property, leading to an empty commercial building. The northern side of the junction will be widened into land already in ownership of the Council and previously set aside for a road scheme and currently partly used as a temporary garden.
- 3.17 The northbound approach to the junction of Harrogate Road will be widened on both the east and western sides. The eastern side will be widened into a grass

verge fronting a “KFC” food outlet but which is in the ownership of the Council. The western side will see the creation of a new length of highway with access into Farmfoods Supermarket, through land currently occupied by No. 911 and Nos. 913/915 Harrogate Road, all of which will be demolished.

- 3.18 The existing vehicular access on Harrogate Road serving Farmfoods Supermarket would be closed and relocated by some 25 metres to the south. The new access would be to Department for Transport’s Manual for Streets (2007) (see Core Document 21.1.41) highway standards and would incorporate a visibility splay to that standard.
- 3.19 The southbound approach of Harrogate Road will be widened on both sides. The eastern side of Harrogate Road will be widened into the front garden of a listed building situated at No. 830 Harrogate Road and onto land which is currently owned by the Council. The western side of Harrogate Road will be widened into the car park of Optegra Eye Hospital.
- 3.20 On the north eastern corner of the junction a new, one-way link road will be created onto land already owned by the Council and a small corner of land at No. 830 Harrogate Road. This link road will accommodate traffic travelling southbound on Harrogate Road and wishing to turn left, onto New Line in a westbound direction.
- 3.21 All other road widening construction will be carried out within the existing highway boundary including some narrowing of existing footways where appropriate.
- 3.22 Land is being acquired at New Line Retail Park to mitigate the loss of customer car parking created through the acquisition of frontage land. The Council considers it essential to acquire this land because the loss of parking may result in a loss of trade for the existing tenanted business and potentially cause New Line Retail Park to be significantly injuriously affected. Planning permission to demolish Unit No. 4 (No. 70 New Line), at the New Line Retail Park currently comprising a vacant “fish and chip” shop has been granted in order to permit alterations to be made to the structure of the retail park block of buildings to enable replacement parking to be provided once the existing retail car parking spaces fronting the retail park are lost when the adjoining New Line road is widened.
- 3.23 The existing vehicular access serving the New Line Retail Park would be relocated to a point approximately 40 metres to the west becoming a shared access with Sunnyside Day Nursery, New Works Unit’s A & B and New Line Retail Park.
- 3.24 As part of the overall Scheme, all proposed traffic lanes would be a minimum of 3.0 metres wide. To help relieve the heavy congestion and provide additional capacity to cater for traffic growth, new traffic lane lengths at the improved Junction would be provided as follows –

New Line westbound approach -
120 metres straight ahead lane and
60 metres right turning lane

New Line eastbound departure -
120 metres straight ahead lane

New Line eastbound approach -
60 metres straight ahead lane and
50 metres right turning lane

New Line westbound departure -
80 metres straight ahead lane

Harrogate Road northbound approach -
20 metres extension to the two northbound lanes

Harrogate Road southbound departure -
50 metres straight ahead lane

Harrogate Road southbound approach -
20 metres extension to the two southbound lanes

Harrogate Road northbound departure -
200 metres straight ahead lane and a 40 metres right turning lane

New one way P-Loop Junction carriageway -
60 metres left turning lane and
60 metres right turning lane

4.0 Scheme Design Standards

4.1 In designing the geometric layout of the Scheme, the Council has had regard to guidance the Departments for Transports overseeing organisation, Highways England standards and advice notes contained in the “Design Manual for Road and Bridges” (see Core Document 21.1.20), Although these documents relate principally to motorway and all-purpose trunk roads, where applicable the same desirable high design standards have been applied to the Scheme.

4.2 No departures from standards or relaxations are required

4.3 A Stage 1 Road Safety Audit (RSA1) was carried out in August 2014. Issues raised have subsequently been incorporated into the scheme design, the RSA1 document is contained in Core document 21.1.52.

5.0 Options Considered

5.1 One of the Scheme’s key challenges is the constraint placed on the site by existing properties. This is particularly the case on the New Line east/west corridor.

5.2 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.

- 5.3 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.
- 5.4 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.
- 5.5 In further seeking to reduce land and property acquisition, an optimised 'P-Loop Junction' layout was produced and modelled. 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.
- 5.6 Storage capacity within the Optimized 'P-Loop junction' itself was discussed and modelled at length. In discussion with the Council's Urban Traffic Control UTC Unit it is expected that any potential demand for increased storage can be controlled by adjusting signal timings using SCOOT/MOVA control systems. Timings can either be controlled manually or remotely by the UTC unit control room, A CCTV camera will be located at the junction enabling the UTC room to remotely monitor the site.
- 5.7 In conclusion, the Council adopted the optimised 'P-Loop Junction' layout as the preferred option for the Scheme and this was taken forward to support the Council's Gateway 1 funding submission to the West Yorkshire Combined Authority.

6.0 Provision for Pedestrians / Cyclists

- 6.1 The Scheme would provide most carriageways with 1.5metres wide cycle lanes in each direction throughout the junction making a combined total of over 600 metres of new cycle lanes.
- 6.2 Where carriageway space is limited such as on both the Harrogate Road downhill northbound arms the inside (nearest to kerb line) lane would be a minimum of 4.0 metres wide allowing for comfortable overtaking of cyclists within that lane width. Each of the new traffic signal lane approaches would have advanced cycle stop

lines.

- 6.3 The Scheme would include significant improvements to assist pedestrians to cross the roads. At the new junction there would be controlled pedestrian crossing facilities with red coloured tactile paving and dropped kerbing on each arm of the Junction. The four crossing routes would be staggered giving refuge in the centre of each carriageway.
- 6.4 In addition there would be two new controlled crossings one each on New Line and Harrogate Road. The one on New Line would replace the existing pelican crossing outside Asda and would also be staggered. The crossing on Harrogate Road would be a brand new facility located just to the north of Carr Bottom Road.
- 6.5 The scheme will retain all existing pedestrian access points to the highway.

7.0 Public Right of Way (PROW footpath 352)

- 7.1 There is one definitive right of way (footpath 352), crossing the CPO Order Land which is located to the eastern boundary of the "QRI Ltd" property on New Line. Due to realignment of the carriageway the existing access to the path is stopped up, with a newly created access located approximately 4m to the north to provide access from the new footway alignment.

8.0 The Schemes Effect on Bus-Stops

- 8.1 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 Combined Authority who own the bus shelters and have a licence from the Council, in its separate capacity as local Highway Authority to locate the bus stops/shelters in the positions illustrated on the plan annexed to the Statement of Case and marked Appendix 3 (see Core Document 1, Appendix 3). During the Scheme construction, an opportunity will be taken to improve each bus stop amenity, including the provision of shelters (albeit some would be reused) with real time information. The bus stop shelter proposals meet the design standards from the Combined Authority for positioning, function and footway widths, as described in the Metro Bus Stop Infrastructure Standard 2008 (see Core Document 21.1.40).
- 8.2 The alterations that have been agreed are as follows -
 - 8.3.0 Bus stops within the CPO Order –
 - 8.3.1 Harrogate Road bus stop/shelter for northbound buses near Optegra Eye Hospital - the bus stop would be set back and remain in its existing location. A new shelter would be provided;
 - 8.3.2 New Line bus stop for westbound buses outside Farmfoods Supermarkets store. In order to assist free flowing traffic through the Junction, this stop would be relocated

some 150 metres to the west. The improved facility would include a bus lay-by and shelter. This stop may be amalgamated with the stop opposite Stockhill Road

8.4.0 _Bus stops outside the CPO Order Land -

8.4.1 Harrogate Road bus stop for southbound buses outside Saint John the Evangelist Church – the bus stop would be set back and remain in its existing location;

8.4.2 New Line bus stop/shelter for eastbound buses outside Asda - this stop would have to be moved due to the close proximity of the signals that control the end of the 'P'-flowing traffic through the Junction this stop would be relocated some 70 metres to the east. The improved facility would include a bus lay-by and shelter;

8.4.3 Harrogate Road bus stop/shelter for southbound buses near Costa Coffee - in order to assist free flowing traffic through the Junction this stop would be relocated some 60 metres to the south;

9.0 Scheme Implementation

9.1.0 Construction programme and implementation.

9.1.1 Construction of the Scheme is provisionally scheduled to commence in late 2019. It is anticipated that the construction phase would be approximately 12 months.

9.1.2 It is intended that the Scheme will be delivered by an award of a Contract to a Contractor appointed by the Council through a competitive procurement process in accordance with the Council's financial and procurement rules and relevant statutory provisions and that the Scheme implementation programme is to be finalised with the appointed contractor.

9.1.3 It is intended to carry out the Scheme works with minimum disruption to pedestrians, residential and commercial premises occupiers and road users. Access to properties will be maintained at all times during business hours. Any unavoidable disruption to accesses will usually only take place outside of business hours of the affected property and discussions with affected parties will take place in advance of and during the works.

9.1.4 In the event that the nature of the works adjacent to a property cause vehicular access to that property to be impossible , this shall only be done by advance notification and negotiation between the contractor and the property owner. The council will ensure that any such agreements entered into are strictly adhered to, ensuring the minimum of disruption to the property owner.

9.1.5 The main priority is to reduce disruption to a minimum while these important works are being undertaken. Through traffic will be maintained at all times during the daytime. There may occasionally be the need to close a road during the night for certain disruptive works. Advanced notice will be given of these works and suitable

advance notification and diversion routes will be sign posted. There may be periods where temporary traffic lights are required.

9.1.6 The A658 Harrogate Rd and A657 Newline are designated as 'permit streets' and works on them will be subject to regulation under the Yorkshire Common Permit Scheme. The permit scheme replaces part of the existing New Roads and Street Works Act noticing system. Anyone carrying out works in a permit street must apply for a permit, which sets out how the work will be undertaken to minimise disruption.

9.1.7 Construction will take place primarily during the daytime and through traffic will be maintained during this time. There may be rare occasions where a road closure may be required (for example for road re-surfacing) and these works may be done during the evening or overnight, with signed traffic diversions in place. However, working hours will be tailored to the requirements of the site. Working hours are expected to be 8.00 am to 6.00 pm Monday to Friday and 8.00 am to 1.00 pm on Saturdays. Certain works in sensitive areas such as junction approaches will be restricted to off-peak hours, e.g. between 9.30 am and 15.30 pm, and on occasions, Sunday working may be necessary to carry out other disruptive works.

9.1.8 During the works all reasonable steps will be taken phase the works to minimise the impact of construction on businesses and residents. This will involve contractual clauses obligating the contractor to working methods best suited to achieve this. The Council will closely monitor the impact of the construction works to ensure these measures are applied

9.19 Construction Practice

9.20 The Contractor will be required to adopt the recommendations of the Local Government Association Considerate Constructor Scheme (May 2011) (see Core Document 21.1.24), which aims to improve the "image" of the construction industry through good practice. The Contractor will be required to adopt the requirements of this Code of Practice where they are more onerous than those set out in the Considerate Constructor Scheme. Where necessary, it is expected that the Contractor, with no prior intervention, shall adopt stricter controls than may be included in this Code or the Considerate Constructor Scheme to reduce annoyance or nuisance.

10.0 The Side Roads Order

10.1 The Side Roads Order provisions relate to the Classified Roads of the A658 Harrogate Road and the A657 New Line, which the Council propose to improve at their crossroads junction.

10.2 The A658 Harrogate Road improvement will extend 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. The A657 New Line improvement will extend for a point 45 metres north west of its junction with Haigh Hall Road, south eastwards to its junction with Elder Street.

10.3 **The Side Roads Order Provisions**

10.3.1 Stopping Up of Highways

10.3.2 A length of urban footpath, which extends north eastwards off the A657 New Line, running along the western side of the War Memorial Site, will be encroached upon by the A657 New Line improvement, its widening at this location, and be stopped up.

10.3.3 The footpath will continue to connect with the A657 New Line, set back on its improvement highway boundary.

10.3.4 New Highways

10.3.5 A new length of highway, a road, reference A in the Order (see Core document 21.1.17), will be provided off the A568 Harrogate Road, leading into the south east corner of the site of the Farmfoods Store. The highway will have on highway parking bays provided along its south western side of its main carriageway. A new vehicular and pedestrian private means of access to the Farmfoods Store will be provided off its north west termination point.

10.3.6 A new length of highway, a road, reference B in the Order (see Core Document 21.1.17), will be provided from the junction of the improved A658 Harrogate Road to the junction of the improved A657 New Line, in the north east quadrant of the Junction. This road will provide a P-Loop arrangement, one-way southwards, catering for left and right turning movements from the Harrogate Road into New Line.

10.4 Stopping Up of Private Means of Access to Premises/New Private Means of Access to Premises

10.4.1 A number of pedestrian only, vehicular, or vehicular and pedestrian, Private Means of Access to Premises are to be stopped up off the existing A658 Harrogate Road or A657 New Line, where they are to be improved.

10.4.2 In each and every case, a new Private Means of Access to Premises is to be provided, either set back onto the improved highway boundary of Harrogate Road or New Line as the case may be, or in close proximity to where the existing Private Means of Access is located.

10.4.3 Existing private means of access to be stopped up and the new means of Access to be created by the order are recorded in *the Side Roads Order 2017*, which is contained in Core document 21.1.17

10.4.4 The locations of private means of access are shown on the *Side Roads Order Plan* contained in Core document 21.1.18.

11.0 Traffic Regulation Order

- 11.1 Traffic regulation orders pursuant to the Road Traffic Regulation Act 1984, are required in order to impose waiting restrictions and restricted turns at Harrogate Road and New Line. It is not considered that there are any insurmountable issues which would preclude the provision of such an order.
- 11.2 As part of the wider consultation that ran from the 30th August 2016 until the 23rd September 2016 with local residents, businesses and statutory consultees, reference was made to the proposed need for traffic regulation orders to be introduced. A decision as to whether or not to make the traffic regulation orders and subsequent formal consultation will be made dependent upon the progress of both the CPO Order and Side Roads Order.

12.0 Objections to the Order

- 12.1 Seven objections (the 'Objectors') were received in respect of the Order and these are listed below. At the time of completing this report, three/four have been formally withdrawn.

| Remaining Objections | | | | |
|--|---------------------|-------------------------------------|---|-----------------------|
| OBJ Ref No. | CPO Plot Ref | Objector Name | Property | Comment |
| OBJ/1 | 19 | St. Paul Street Investments Ltd | 911 Harrogate Road | Terms agreed. |
| OBJ/2 | 42 | Optegra UK Ltd | Optegra Eye Hospital, 937 Harrogate Road | Objection Remains |
| OBJ/3 | 9 | Sriven Services Ltd T/A Subway | 74 New Line Retail Park | Objection remains |
| OBJ/4 | 20 | Ladbrokes Coral Group | 913 Harrogate Road | Objection Remains |
| Objections That Have Been Removed | | | | |
| OBJ/5 | 26 | Wilkinson Greengates Properties Ltd | 804 Harrogate Road | Objection now removed |
| OBJ/6 | 30 | Mr & Mrs Lock | 140 New Line | Objection now removed |
| OBJ/7 | N/A | Northern Powergrid (NE) Ltd | In respect of Statutory Undertakers Plant and Equipment | Objection now removed |

12.2 Where the objection relates to highway engineering issues, either in the proposed scheme design, or in proposals to mitigate issues raised in the objection, I address these matters directly. Where the nature of the objection pertains to other matters such as the requirement for the land, I refer to the relevant expert's evidence.

13.0 Design mitigation measures with regard to Objectors:-

13.1.0 Objection OBJ/1 – St. Paul St Investments Ltd

13.1.1 The proofs of evidence prepared by Andrew Bradshaw (transport planning and modelling) (see Proof P08/AB/Transport Modelling) and Kate Okell (land and property matters) (see Proof P04/KO/Land & Property, Para 6.4) provides further response and justification with regard to this objection.

13.1.2 Grounds of objection in relation to engineering issues are as follows:-

13.1.3 *“The subject property is situated in an area which is to be redeveloped to facilitate and new access arrangement for the neighbouring retail park. It is proposed that these access arrangements should be redesigned to co-exist with and preserve our clients property.”*

13.1.4 If left in its current location the existing Farmfoods entrance would Impede the safe and efficient operation of the proposed junction. There is potential for traffic turning right in to the site to queue into the junction at peak times as discussed in Andrew Bradshaw's Proof of Evidence (see Proof P08/AB/Transport Modelling, Para 8), restricting the flow through the junction, potentially leading to vehicles blocking the junction between signal phases leading to inefficient operation and risk of collision. The proposed location of the Farm foods access reduces this possibility by providing additional queue length for traffic turning right into the site.

13.1.5 Vehicles exiting the site would be very close to the proposed stop line, traffic signals and pedestrian crossing facilities, with associated visibility issues this proximity would introduce. It is good engineering practice to ensure that junctions provide adequate visibility and in this case it is considered that moving the Farmfoods site access further away from the junction provides a safer option for traffic emerging from the site as well as pedestrians and cyclists. Who may be waiting at the crossing facility or at the advanced stop line.

13.2.0 Objection OBJ/2 – Optegra Eye Hospital

13.2.1 *“No compelling case in the Public Interest to acquire land or rights over plot 42”*

13.2.2 Optegra eye hospital (Plot 42) is located in a critical 'pinch point' in the Scheme. Here, land is required to facilitate construction of additional lanes on the northern Harrogate Road approach and exit of the Harrogate Road/New Line junction and to construct a bus-shelter. Widening options to the eastern side of Harrogate Road are limited due to the presence of several properties including a listed

building, known as “Greengates House”. If Plot 42 is not included in the CPO Order, the restricted existing available highway would not allow the construction of additional entry and exit lanes and therefore adversely affect the operation of the junction.

- 13.2.3 Any alternative option would have an unacceptable impact on the listed building (“Greengates House”). Planning permission/listed building consent is unlikely to have been obtained which would render this option unfeasible. In light of this, the Council strongly believes that acquisition of Plot 42 is in the public interest.
- 13.2.4 *“Car parking provision at the Hospital is already limited and options need to be considered to how any loss can be replaced.”*
- 13.2.5 There are currently 20 car parking spaces in the southern car park at Optegra. However one space is rendered un-usable due to the existing car parking layout/design. The Council has offered to undertake accommodation works to the car park which upon completion of the Scheme will provide 20 fully accessible parking spaces designed to modern standards. Accordingly, the Council believes the existing number of parking spaces will be retained and the proposed car parking layout will be an improvement.
- 13.2.6 *“Construction will further reduce the number of parking spaces available at the hospital for an unspecified period of time and make access to the hospital even more difficult for patients, staff and suppliers. Further consideration needs to be given to reducing the area set aside for construction in the location so that impact can be mitigated”.*
- 13.2.7 The Council is currently investigating possible temporary car parking arrangements for the objector and will continue to work towards a solution. Correspondence regarding this issue is contained within Kate Okell’s Proof of Evidence (see Proof P04/KO/Land and Property, Para 6.14).
- 13.3.0 Objection OBJ/3 – Sriven Services Ltd
- 13.3.1 *“Drastically spoil the frontal elegance for the shops”*
- 13.3.2 Although the Scheme may have a minor impact on the frontal elegance of the “New Line Retail Park Parade”, it is considered that overall the Parade will benefit from:-
- a) improved visibility; and
 - b) a refurbished, modern car parking area.
- 13.3.3 In terms of a) above, currently motorists approaching from the east currently have poor visibility of the Retail Parade because the building is obscured by the adjacent Farmfoods Supermarket store. This means that motorists do not see the Parade until they are on or past the existing vehicular entrance and this consequentially hinders passing trade. Similarly, vehicles approaching from the west have reduced

visibility due to the existing car parking spaces being located directly in front of the retail units. The Scheme will reduce the number of parking bays directly obscuring the shops by creating two main clusters of parking 'zones' at the east and western ends of the New Line Retail Park.

13.3.4 In terms of b) above, the current car park has not been improved for some time and suffers from faded markings. The Scheme will relay the existing block paving as required and replace the car park markings based on current parking standards at no cost to the Landlord or the Tenants.

13.3.5 *“Create congestion for customers in the considerably reduced front area”*

13.3.6 The proposed new access and internal roadways have been designed using current design guidance and are considered acceptable for the proposed use. Tracking plan (P/PTH/MH/103196/LA-27B) showing how a large vehicle can navigate the car park is included in Appendix 1 of this document. The Council has successfully attained planning permission for the revised entrance arrangement (ref 17/03441/REG) (see Core Document 21.1.51)

13.3.7 *“Entail a longer drive to reach parking area and longer walk to my shop”.*

13.3.8 The Scheme proposals include a new vehicular access point which will be shared by New Line Retail Park, Sunnyside Day Nursery and New Works Units A and B. Whilst the Harrogate Road/New Line junction does move 40 metres to the west, entailing a marginally longer drive for customers travelling from the east, this is negated by a reduced drive for customers travelling from the west.

13.3.9 It should be noted that the current access to New Line Retail Park does not meet current safety standards and visibility is seriously compromised when performing any manoeuvre to exit the car park. Furthermore, if left in its current position, vehicles would be required to make an unsafe manoeuvre to cross a maximum of 3 lanes to exit the car park. The new proposed shared access point will meet visibility standards and is set back from the junction in such a way that vehicles will only need to cross 1 lane of traffic to access/egress the car park.

13.4 Objection OBJ/ 4 – Ladbrokes/Coral Bookmakers -

13.4.1 *The acquisition and demolition of the above premises is solely to facilitate a new access into the Farmfoods property and we fail to see how it is in the public interest to adopt CPO powers to acquire and demolish the CORAL premises (thereby extinguishing our business) to the benefit of another existing commercial occupier and*

13.4.2 *It appears that an arbitrary decision has been made to acquire / demolish the above property along with no 911 rather than adopt other options to facilitate the scheme.*

13.4.3 The Engineering justification to this objection is the same as for Objection OBJ/1 – St. Paul St Investments Ltd, in that demolition of the property is required to

construct a new access to the Farmfoods store. As such I refer to my comments in relation to OBJ/4 contained in this evidence.

- 13.4.4 The proofs of evidence prepared by Andrew Bradshaw (transport planning and modelling) (see Proof P08/AB/Transport Modelling, Para 8) and Kate Okell (land and property matters) (see Proof P04/KO/Land and Property, Para 6.51) provides further response and justification with regard to issues within this objection.

14.0 Conclusion

- 14.1 “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”

15.0 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 11th October 2018

APPENDIX 1