

Pell Frischmann		Project No. A13398/VAA
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TECHNICAL NOTE	Project Land at Chidswell, Dewsbury	Date 13/03/2018
Subject Response to Morley Town Council Highways Objection to the Allocation of Land at Chidswell, Dewsbury (MX1905)		By Chkd S Evans

INTRODUCTION

1. Pell Frischmann is retained by the Church Commissioners for England (the 'Commissioners' and the 'Applicant') to provide transport planning and highways consultancy advice in connection with the Commissioners' strategic landholding at Chidswell, Dewsbury (the 'site').
2. The Local Planning and Highways Authority is Kirklees Council (KC). The Commissioners' site is included for allocation within the KC Draft Local Plan, which is currently the subject of an Examination in Public by a Government appointed Inspector. By way of reference, the Commissioners' site is referred to as 'Land East of 932-1110 Leeds Road, Shawcross/Woodkirk, Dewsbury' (KC Draft Local Plan site allocation reference MX1905).

BACKGROUND

3. The Commissioners' site has been identified to deliver 1,535 dwellings and 122,500 square metres (m²) of employment development during the Local Plan period. The Delivery and Implementation schedule submitted by WYG Planning to the Inspector, on behalf of the Commissioners, identifies the delivery of this quantum of development between 2020/21 and 2030/31, in various phases.
4. This Technical Note has been prepared by Pell Frischmann, on behalf of the Commissioners, to respond to the *Highways Objection on behalf of Morley Town Council* dated February 2018. This objection document refers directly to the WYG Transport *Interim Transport Assessment* (ITA), also prepared on behalf of the Commissioners, dated August 2016. The purpose of this Technical Note is to address the various concerns raised.

INTERIM TRANSPORT ASSESSMENT (ITA)

5. By way of context, it should be noted that the *Interim Transport Assessment* (ITA) assesses masterplan proposals also for 1,535 dwellings and 122,500m² of employment development over an approximately 10-year period. Various junction capacity assessments have been carried out, the results of which are presented in the ITA, testing the masterplan proposals in two future assessment years; 2020 and 2030. In the 2020 future assessment year the ITA tests a total of 480 dwellings and 122,500m² of employment development; and in the 2030 future assessment year it tests the full proposed allocation of 1,535 dwellings and 122,500m² of employment development.
6. As set out in the introductory chapter of the ITA, the interim assessment follows various other technical work undertaken in relation to the proposed allocation at the site; this includes a *Transport Feasibility Study and Sustainable Transport Strategy Report* prepared in 2013; an *Accessibility and Connectivity Review Technical Note* dated December 2015 (submitted to KC in January 2016); and an *Interim TA Scoping Note* dated April 2016.
7. The 2013 *Transport Feasibility Study and Sustainable Transport Strategy Report* identifies that there are numerous services and facilities located within Department for Transport (DfT) recommended walking, cycling and public transport travel times from the site; it concludes that the site is in a highly accessible location and is conveniently located in relation to various DfT identified core services and facilities. The report recognises that there is, "great potential with the site to encourage a significant modal shift away from single occupancy car use towards sustainable [i.e. non-car] modes, including 'active' travel modes such as walking and cycling".

8. The 2013 *Transport Feasibility Study and Sustainable Transport Strategy Report* concludes that early options for the masterplan would likely create the need to enhance existing bus services and to improve existing bus frequencies to key destinations. The report also considers potential future public transport penetration into the site, together with the potential provision of a new shuttle bus, linking the masterplan site with the nearby Dewsbury Railway Station, for example.
9. The 2015 *Accessibility and Connectivity Review Technical Note* provides an update to the abovementioned 2013 *Transport Feasibility Study and Sustainable Transport Strategy Report*. It presents an audit of the proximity of existing key local facilities and services to the site, including employment; primary, secondary and further education; healthcare; retail; and recreation and leisure.
10. The proposed scope of the August 2016 ITA is set out in the April 2016 *Interim TA Scoping Note*; this is based on previous technical notes and discussions with KC officers.

RESPONSE TO THE OBJECTION

11. The *Highways Objection on behalf of Morley Town Council* (hereafter referred to as the 'Highways Objection') states that the ITA provides, "*copious amounts of information and detailed results of analyses but lacks any supporting documentation*". It also suggests that the ITA as submitted is, "*therefore inadequate and misleading / incorrect*". The remainder of this Technical Note will demonstrate, with reference to specific points raised, that the above statements are incorrect and therefore that the conclusions drawn by the Morley Town Council (MTC) Highways Objection are unfounded.

'Missing' Supporting Information and Appendices

12. Paragraph 2.2.4 (p. 4) states that, "*It is appreciated from the ITA text that WYG has discussed matters with KMC [Kirklees Metropolitan Council / KC] Officers and their consultants and the 'missing information' in the absent appendices may have been submitted separately but one then has to question why this information is not posted on the Council's website*".
13. In response to this point, and for clarity, it is confirmed that various supporting information related to the ITA, such as TRICS trip rate calculations, traffic modelling results and site access designs, has been shared with KC Highways officers as part of the preparation of the ITA. However, information such as site access designs, that clearly identify the proposed points of access to the site, have not been released into the public domain as they contained, at the time, commercially sensitive information.

Existing Transport Situation

14. In Paragraph 2.5.2 (p. 5), the Highways Objection refers to walking distances between the site and existing nearby bus stops. It disputes the distances identified within the ITA on the basis that a "*significant quantum of development*" is towards the eastern half of the site, therefore suggesting that the travel distances will be greater than as stated in the ITA.
15. In response, it is noted that given such a large site, it is considered reasonable to measure walking distances to public transport from various points, including various points around the edge of the site. As already identified in the 2013 *Transport Feasibility Study and Sustainable Transport Strategy Report* that is referenced within the introductory chapter of the ITA, it has already been acknowledged that the masterplan would likely create the need to enhance existing bus services and that future public transport penetration into the site is a possibility. Whilst such options would be explored as part of a future planning application, it should *not* be assumed that public transport accessibility would not improve in the future.

Engagement with Leeds City Council and Wakefield Council

16. Paragraph 2.5.4 (p. 4) of the Highways Objection refers to agreement with KC Highways officers but notes the ITA makes no mention of the same agreement with officers from Leeds City Council (LCC) or Wakefield Council (WC). It is confirmed that discussions and agreements 'in principle' took place with KC Highways officers as part of the preparation of the ITA. It is further understood that KC Highways officers have been liaising with their counterparts at LCC and WC as part of KC's Duty to Cooperate.

Traffic Data Collection

17. The Highways Objection notes that baseline traffic surveys were carried out on Thursday 5 May 2016 and continues, stating that it is, "*industry standard practice to carry out such surveys outside of school holidays / holiday periods to ensure that the data gathered is as representative of normal traffic conditions as possible*".
18. The timing of the baseline traffic surveys was discussed with KC Highways in advance and the surveys were carefully timed to avoid holiday periods. It is confirmed that Thursday 5 May 2016 was a term-time date. The surveys were carried out as soon as possible so as to keep as much distance as possible between them and the school summer half term holiday and school summer holidays.
19. As noted in the ITA (Paragraph 5.17, p. 53), the 2016 baseline traffic surveys were used to inform the '2016 Base' traffic assessment. However, the 2020 and 2030 future year assessments (both with and without allocation site development traffic) are not solely reliant on the May 2016 traffic surveys but also utilise traffic data contained within the established KC SATURN strategic traffic model. As noted in Chapter 5 of the ITA, the 2016 baseline traffic survey data is uplifted using growth factors derived from the SATURN traffic model, to produce 2020 and 2030 predicted traffic flows. Committed development traffic, as contained within the KC SATURN traffic model, is also taken into account.
20. It is industry-standard practice to conduct traffic surveys on given dates, as agreed with the respective Highways Authority, to inform a Transport Assessment (TA) or similar transport report. It is noted that background traffic flows vary from day-to-day. However, it is considered that the use of the established SATURN traffic model to inform the future assessment years adequately resolves any potential issues arising from daily traffic variation in the 2016 Base scenario.

Indicative Masterplan Proposals

21. Paragraphs 2.6.1 and 2.6.2 (p. 8) of the Highways Objection refer to the allocation site's indicative masterplan proposals and, as identified in the ITA, the five proposed access points to the site. As noted previously within this Technical Note, the reason why the access designs are not presented in the ITA is because, at the time, they were commercially sensitive. However, it is confirmed that the access designs have been shared with KC Highways officers on a confidential basis and it is confirmed by KC Highways officers that these site access designs are acceptable to them 'in principle'. It is recognised that proposed site access designs will be subject to further detailed design and Road Safety Audits (RSAs) as part of a future planning application.

Trip Generation, Assessment and Distribution

22. It is noted that the assumptions behind and calculations related to the trip generation, distribution and assignment have been discussed and agreed with KC Highways officers as part of the development of the ITA.
23. The trip generation assessment follows industry-standard best practice, including with reference to the TRICS trip rate database *Good Practice Guide*. The trip rates used to derive the predicted development traffic flows for the allocation site have been derived from comparable survey sites contained within the TRICS database.
24. The derivation of mode splits for the ITA, including vehicle mode splits, utilises local mode split data obtained from the Office for National Statistics (ONS). The approach and methodology followed in deriving these mode splits, for both the residential and employment elements of the proposed allocation, is in accordance with industry-standard best practice and is as agreed with KC Highways officers. Similarly, the trip distribution and traffic assignment are based on ONS 'Travel to Work' data, also in accordance with industry-standard best practice and as agreed with KC Highways officers. The proposed traffic distribution is presented in Figure 4.1 and Figure 4.2 of the ITA (Chapter 4, pp. 44-45).
25. Paragraph 2.7.5 (p. 9) of the Highways Objection makes reference to, "*normally accepted vehicle trip rates used by KMC Highways Officers for planning applications in their area*"; furthermore, it questions the approved trip rates as contained and used in the ITA.
26. For clarity, it is not unreasonable or indeed uncommon for trip rates for proposed developments within in the same local authority area to vary. For robustness, and as is the case within the ITA, the TRICS site selections that have informed the trip rates have taken account of the allocation site's

characteristics. It is considered that it would be incorrect to automatically use trip rates previously agreed by KC Highways officers for other development sites in the area, as these other sites may have different characteristics, such as site location and accessibility.

Junction Capacity Assessment

27. The Highways Objection is critical of the scope of the junction capacity assessment presented in the ITA. However, it is noted that the scope of the assessment has been determined following the outcome of the above trip distribution and traffic assignment exercise and focusses on those junctions where the allocation site is expected to have the greatest impact. The scope of the junction capacity assessment, including the junctions themselves and the timings of the assessment scenarios, has been discussed and agreed with KC Highways officers beforehand.

M1 Junction 40 (Flushdyke Interchange)

28. The Highways Objection notes that the M1 Junction 40 (Flushdyke Interchange) lies within the WC jurisdiction. This is noted and it is understood that discussions have taken place between KC Highways officers and WC, particularly in relation to this junction, as part of KC's Duty to Cooperate.
29. The ITA identifies that this junction would require certain mitigation in order to operate within capacity levels in the 2030 future assessment year, assuming the full allocation of 1,535 dwellings and 122,500m² of employment development is built-out. In response to the Highway Objection, and as noted within the ITA (Paragraph 6.18, p. 88), this "*certain mitigation*" could involve the optimisation/re-validation of the traffic signals, including "*slight alterations*" to the inter-green times, to maximise the vehicle throughput.
30. It is noted that, whilst the ITA identifies certain mitigation that could potentially be implemented at this junction, the precise and final nature of the mitigation would be determined as part of a Transport Assessment (TA) in the context of a future planning application. In response to concerns related to highway safety, it is noted that any proposed improvements to the junction would be subject to agreement with the relevant Highways Authorities and would also be subject to a Road Safety Audit (RSA), as is normal practice.

M62 Junction 28 (Tingley Interchange)

31. The Highways Objection notes that the M62 Junction 28 (Tingley Interchange) lies within the LCC jurisdiction. This is also noted and, similar to the above comments, it is understood that discussions have taken place between KC Highways officers and LCC, including in relation to this junction, as part of KC's Duty to Cooperate.
32. Similar to the M1 Junction 40, it is noted that, whilst the ITA identifies certain mitigation that could be implemented, the precise and final nature of the mitigation would be determined as part of a TA in the context of a future planning application. Any proposed improvements to the junction would be subject to agreement with the relevant Highways Authorities and would also be subject to an RSA.

Other Off-Site Junctions

33. Similar to the above comments, it is noted that where any junction mitigation is proposed, these would be subject to agreement with the relevant Highways Authorities and would be subject to RSAs. However, it should also be noted that all junctions tested in the ITA would be tested again as part of a further TA in the context of a future planning application.
34. Paragraph 2.8.13 (p. 17) of the Highways Objection refers to the method of operation of the traffic signals at the A653 Leeds Road / Heybeck Lane junction, that is assessed as part of the ITA. The Highways Objection states that, "*It should be pointed out that the method of operation of this junction may have changed since the ITA was written as the right turn movements off the A653 are now signalled separately*". In response, it should be noted that a TA as part of future planning application would also reflect any changes to baseline transport conditions that have occurred since the ITA was prepared in 2016, including any changes to the operation of traffic signals.

SUMMARY AND CONCLUSIONS

35. The MTC Highways Objection concludes with its view that, *“the ITA as submitted is therefore inadequate and misleading / incorrect”*; furthermore, with the *“possible deliberate act of omission of full details of the traffic impact of the proposals”*. Pell Frischmann and the Commissioners strongly disagree with this conclusion and take the view that the ITA is robust and accurate throughout.
36. The scope, approach and methodology of the ITA has been discussed and agreed with KC Highways officers. The ITA successfully demonstrates that, where off-site highways mitigation is likely to be required, suitable mitigation can be offered. It is further note that, should the Commissioners’ site be allocated for development, a future planning application would be accompanied by a further Transport Assessment (TA), the scope of which would be discussed and agreed with KC Highways officers and other Highways Authorities, as appropriate. Additionally, proposed site access arrangements and proposed off-site highways mitigation would be subject to agreement with the relevant Highways Authorities and would also be subject to Road Safety Audits (RSAs), as is normal practice.