

RE: Application 2018/91661 Land at Walkley Terrace and Brunswick Street, Heckmondwike

I am a resident of Heckmondwike, living near to the above proposed development and OBJECT to both the Outline permission for residential development and planning permission for engineering operations and formation access on the following grounds.

LAND STABILITY:

I am concerned for the stability of the embankments along the East and North of the site when they are cut to fill in the valley floor. There are homes close by these embankments that could be affected and a public footpath along the edge of these embankments that may be undermined and lost.

I understand there are known to be at least two old mine workings, maybe more, under and around the cutting, although their locations appear to be unknown. I'm sure the effect of moving such mass, during the cut and fill phase of the development, must threaten the stability of these workings. Thereafter the process of compacting the cut earth, sufficient to lay the spinal road, will cause further stress. Additionally, the shock of driving piles down to strata firm enough to support foundations could cause collapse.

You too must have such concerns, to have served a notice upon the developer to provide 'A geotechnical stability assessment which assesses the potential for excavations associated with this development to cause instability in adjacent land and appropriate remediation strategies.'

It appears to me that the Conceptual Design Statement Produced on behalf of the Developer by _____, falls significantly short of what has been asked for.

It only seems to address the stability of the proposed houses. Referring to the pile foundations, Gabion basket and reinforced concrete retaining walls. There is no study or assessment of the viability of the embankment to remain in place whilst these retaining measures are being built.

It states that Pile foundations are to be sunk 'down to suitable bearing strata. The ground conditions are to be confirmed following further site investigations to ascertain the ground conditions.'

Are these further site investigations not what has been asked for?

The Risk assessment refers to:

Risk - Damage to existing adjacent structures due to increased loading, Increase in risk of settlement due to additional load.

Their Mitigation Strategy States:

A load assessment during the detailed design stage will determine any scale of risk.

Risk - Risk of collapse above public areas. Collapse of structure due to construction activities

Their Mitigation Strategy States:

A load assessment during the detailed design stage will determine any scale of risk. Removal of any unstable structure/wall by contractor. Method statement for demolishing works to be provided by contractor.

There is no reference whatsoever to the former mine workings, the only paragraph with any relevance states: 'The plots to be situated over the filled area of the site are to be built off piled foundations onto suitable bearing strata which is to be confirmed following further on site investigation works.'

Is this on site investigation work, not what has already been requested by requiring a geotechnical stability assessment?

There is no reference in the assessment to site drainage or the action of weather on the stability of the land, particularly as the level of the valley floor will have been raised significantly and the fill being loose in nature, even after any compaction.

NOISE AND VIBRATION:

The noise and vibration generated by the work of cutting and filling, compacting and pile driving, along with heavy plant transporting and erecting Gabion Baskets as well as all other site traffic, will be intolerable for local residents and disruptive to the work of local businesses. The railway cutting is surrounded by residential properties and business premises.

AIR POLLUTION:

The action of cutting and filling, compacting and pile driving along with heavy plant transporting and erecting Gabion Baskets as well as all other site traffic, will no doubt raise a great deal of dust into the air, which local residents and workers will inhale along with increased diesel fumes from the site vehicles and standing traffic from even greater congestion.

I fear It will be impossible to hang clothes on washing lines with any expectation of them not needing to be washed again. Windows will be constantly dirty.

CONGESTION AND ROAD SAFETY:

The Spinal road of this Cul de Sac development will feed onto Horton St, which in turn flows onto Brunswick St and Church St. The outflow of these streets is onto the B6117 Walkley Lane/Market St or A638 High St via either Church Ln or Cawley Ln. All these feeder streets are current narrow rat runs for drivers attempting to avoid the congestion of the town centre. They also provide routes to Heckmonwike Grammar and Junior Schools. These roads and many around them have terraced housing where street parking is the only available option. Many areas of these roads have resident

permit parking zones. Any spaces not occupied by resident's cars are taken by those of six formers or staff of the Grammar school, during term time. Parked vehicles restrict traffic flow to one direction at a time. As a result attempting to negotiate these streets is often akin to an assault course. Both Walkley Lane and High St are extremely busy main roads, in fact data from the transport research company INRIX showed the B6117 to be the 9th most congested B road in the UK. Prior to the previous application for development of this site, I conducted a traffic survey of Walkley Lane at its junction with Walkley Terrace, a junction approximately half a mile from its junction with High Street in the centre of Heckmondwike. En route this passes Brunswick St and Church St. On 3rd November 2017 Between 9am & 4pm I counted 6662 vehicles pass my location.

Between 1442 hrs and 1452 hrs and again between 1453 hrs and 1457 hrs the traffic backed up from the direction of the town centre passed the junction with Walkley Terrace. For some considerable time before and after these times the traffic came to a standstill within 20 metres of the junction. Sometimes traffic was stationary in both directions. I have not yet conducted a survey on High St, but I know from experience, it too bears a heavy traffic flow and its junction with Walkley Ln and Westgate is often in gridlock, where traffic from one direction cannot clear the junction before the traffic lights complete a full cycle, depriving traffic from the other direction the opportunity to move at all.

Around the same time that I conducted the survey, I researched the website Crashmap.com, I looked at the injury collision stats for the past five years in Heckmondwike. There were 76. I also obtained the figures over a similar area for 20 other towns within West Yorkshire of a comparative or larger size. Ranging from Mirfield with – 14, through Cleckheaton at – 41 and Brighouse at - 74 to Pontefract with 91. I found that out of 21 small towns, only Pontefract is a greater accident black spot than Heckmondwike. The road showing the greatest number of accidents was Church St mainly at its junction with Walkley Ln, Market St and Station Ln.

Heavy plant bringing Gabion Baskets and other large site traffic attempting to negotiate a route via Horton St to the site will cause serious traffic issues throughout Heckmondwike.

Assuming most modern households now possess at least two cars, if 74 houses were to be built on the site, I estimate we could expect at least 120 vehicles leaving the development and returning again, during peak traffic flows, adding significantly to the already congested roads of Heckmondwike.

In his report on the earlier application, which was refused in February this year, Highway Officer, made the following observations on the Phase 2 – Residential element of the development: 'The access for the proposed development is proposed to be formed off Horton Street.....'

There is insufficient information to properly assess the traffic impact of this development. Further assessment of the development flow routing is needed. A proportion of the traffic associated with this development will be utilising the High Street / Market Street junction in the centre of Heckmondwike, however the traffic figures do not show traffic dissipating from the site beyond Church Street. The A638 corridor through Heckmondwike, and associated junctions with the A638 corridor, is already very congested. The addition of any further traffic onto this route will only exacerbate these problems. If traffic tries to avoid the already congested junctions along the A638 corridor then that will lead to an increase in rat running through the adjacent residential streets.

Church Street is problematic, with accidents along its full length, and clusters at the junctions with B6117 Walkley Lane and Thomas Street. The roads between Horton Street and the B6117 are all potential 'rat runs', with 2 sets of crossroads (both with recorded overshoot accidents). These roads are of relatively low standard, with stretches of permit parking making it difficult for opposing or turning vehicles to manoeuvre.

No base follows are provided in the Transport Statement.

Highways view is that given the sensitive location of this development a Transport Assessment should have been provided with the scope ideally having been agreed in advance. The Transport Statement submitted is not considered sufficient to enable an assessment of this application to be completed.'

The Developer would appear to have commissioned a further Transport Statement which includes a Transport assessment, in which it describes traffic

5.4. TRAFFIC IMPACT ASSESSMENT

‘Existing traffic on both Walkley Lane and High Street is currently congested at peak hours which results in queueing on both roads. In these busy peak periods queueing traffic would allow vehicles to turn in and out of junctions. This would likely make any PICADY assessments of the surveyed junctions inaccurate as the **flow of traffic on the major arms is currently exceeding capacity** and modelling software does not take account of queueing traffic allowing vehicles to turn. Transport Statement – Walkley Lane, Heckmondwike – 18047 17 The existing peak hour flows on the minor arms our development traffic would access site from are much lower than the other arms of the junctions surveyed. **It is noted that there is a heavy entry flow from Walkley Lane and Station Lane to Church Street. This is likely to be due to the industrial units generating traffic on Church Street and traffic rat running through Church Street to avoid congestion on Walkley Lane and High Street.’**

Despite the above statements, it concludes that ‘the development is considered acceptable in terms of traffic impact and accessibility provision, and fully accords with both national and local transport policy. There are therefore no highway safety or capacity reasons why planning consent for the proposed development should not be granted.’

I fail to see how this conclusion can possibly be drawn, after describing such congestion of the relevant roads.

I wonder at the accuracy and validity of this report when within Appendix E Traffic Survey Data on page 65 it states the data was obtained for Walkley Road/Station Lane on Wednesday 15th April 2018.

Walkley Road does not exist in Heckmondwike and the 15th of April this year fell on a Sunday.

If the report’s authors cannot even provide the correct road names and date when the survey took place, how can their data be relied upon to be correct

Over pages 66 to 69 Car Counter data is shown for each 15 minute period during the survey times for the junctions of High St / Church Ln as well as Walkley Lane / Brunswick St. However there is **NO** data recorded for the major junction affected and which has been identified in their report as ‘having a heavy entry flow from Walkley Lane and Station Lane to Church Street.’

COMPLIANCE WITH THE NATIONAL PLANNING POLICY FRAMEWORK AND THE LOCAL PLANNING POLICY: - ALSO PROVISION FOR JOINING THE ARMS OF THE HECKMONDWIKE GREENWAY/RINGWAY.

Paragraph 35 of the NPPF states that:

“developments should Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;

Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;

and,

Consider the needs of people with disabilities by all modes of transport.

The LOCAL TRANSPORT POLICY sets out the walking and cycling strategy for West Yorkshire to encourage more people to use these modes of travel to help reduce the dependency on private cars. With regards to cycling provision within development proposals, the WYCS seeks to ‘ensure that new development proposals are located and designed to be cycle friendly and adopt guidelines for cycle

parking standards". With regards to walking, the LTP seeks to improve the local environment to make walking more attractive by enhancing safety, security and environmental quality.

This report states that:

'It is considered that this site is in compliance with local and national transport policies due to the sustainable location of the site with good quality facilities for travel by modes other than the single occupancy private car trips.

It seems to me that this is blatantly untrue. If I have read the document and maps correctly, there has been little or no consideration given to allowing the foot/cycle path of the Ringway to join up. It appears to suggest that cyclists and walkers can use the spinal road. Accessing the existing Ringway seems to be only possible by negotiating steps at one end and a 1 in 2 gradient at the other, if at all. Neither of which are, cyclist, walker nor wheelchair user friendly.

FLOOD RISK

At times of high or sustained rainfall, areas of Walkley Lane and the Greenway to the south of this development often flood. Raising the ground level of the site floor and covering it with a hard impervious surface, i.e. Homes and Tarmac will thereby remove the opportunity for direct rainfall and that falling on surrounding areas to run off and be absorbed by this land a natural aquifer, temporarily holding it and gradually allowing it to filter safely into the water table and local beck.

Flood risk is therefore likely to be increased and the developer does not seem to have adequately addressed this concern.

OVERCAPACITY OF LOCAL SERVICES

Local Schools and Doctor's surgeries seem to be at capacity. I'm told schools are not able to add capacity due to having no-where to construct extra classrooms, therefore an educational precept on the developer will not resolve this issue.

ENVIRONMENT, ECOLOGY AND WILDLIFE

This former railway cutting has been described by the developer as derelict land.

It is far from derelict. It may have been so, some 60 odd years ago, however, over the intervening decades, nature has populated it with a wide variety of foliage. Self seeded trees, bushes, grasses, flowers and fungi, all of which provide a rich habitat for foxes, squirrels, rabbits rodents, bats, insects and a selection of birds of many species.

Nearby, at the side of the Greenway there is a fishing lake which supports ducks, geese and swans as well as fish of course.

This lake would undoubtedly be affected should the development go ahead.

The cutting adjoins the mature woodland of a Designated Urban Green Space which also supports a variety of flora and fauna. The development would, no doubt have a detrimental impact on those.

Shortly before the developer sought planning permission, trees were mysteriously felled in the cutting. Since then fires have often ignited the dry grass during the summer months. Necessitating the attendance of the fire service to extinguish them. I do not recall this happening before that time. This could have had a significant impact on the cutting's ecosystem. Thankfully the land is resilient and recovers very quickly.

This land is a valuable part of the green corridor. It is treasured locally for the amenity it provides. Heckmondwike has a high concentration of housing, amongst which there is no other unmanaged natural green space, similar to this that I am aware of.

Children play safely here, having adventures that parks just cannot provide. It is a beautiful and tranquil open green space of which Heckmondwike is desperately short. It ought to be retained in its current form, yet allowing the connection of the Greenway link to the Ringway.

For all the above reasons I urge you to reject both the full and outline planning applications.