

Objection to planning application 2020/60/91146/W for land west of Wesley Avenue, Netherthong - on grounds of unsuitable access, worse road safety, terrible impact on the highway system, and the fact it goes against the National Planning Policy Framework and Kirklees Council's own criteria on sustainable development and climate change policy.

SITE VISIT BY ELECTED REPRESENTATIVES ESSENTIAL

Firstly, it's important to point out that no-one should place any faith in the Sanderson Associates' Transport Statement in support of the development.

Example, section 3.3.3 (Sanderson) states:

"All roads within the rural village of Netherthong are subject to a speed limit of 30mph. However, the limit on Moor Lane increases to 40mph approximately 55m west of its junction with Holmdale Crescent and, approximately 175m west of its junction with Dean Avenue, the limit on Miry Lane increases to the national speed limit."

This is a central issue when talking about highway safety, danger to pedestrians and impact on the local highway system. Yet Moor Lane does not have a junction with Dean Avenue and neither does Holmdale Crescent have a junction with Dean Avenue - so quite where this '175m west' is referring to I don't know.

Inaccuracy like this, and more (see later), points to excessive smoothing of problems in other areas of the report and casts significant doubt on its validity and value.

Example, section 3.3.2 (Sanderson) states:

"Dean Avenue is a residential road with footways to both sides and street-lighting. To the north, Dean Avenue forms one minor arm of a crossroads junction with Miry Lane, Giles Street and Dean Brook Road."

The phrase "one minor arm" to describe the Dean Avenue element of that junction is completely misleading, as anyone who lives in the village, or has travelled through it, will know.

Dean Avenue is steep at that point and that junction is exceptionally difficult to negotiate when approaching down the hill. Visibility onto Miry Lane and Giles Street is testing, and that's without any vehicle emerging from the top of Dean Brook Road. Vehicles arriving at that junction from Dean Brook Road also have incredibly difficult sighting issues looking for vehicles coming down Giles Street from the village, adding to the problems.

In winter, the whole junction is incredibly treacherous, and vehicles have been known to slide straight across from Dean Avenue and into the wall at the top of Dean Brook Road.

And Miry Lane and Giles Street are a key route for parents and children going to and from Netherthong Primary School.

So why try to mislead or misinform councillors and the planning committee about that particularly dangerous junction by using the word 'minor'?

Simple, because it's an integral part of the proposed and totally unsuitable access to the planning application site west of Wesley Avenue.

Example, section 3.3.1 (Sanderson) states:

"Access to the site is to be taken from Wesley Avenue to the east of the site. Wesley Avenue is currently a cul-de-sac, with a carriageway width of approximately 4.9-5.0m, which serves 12 residential properties. Footways of approximately 1.8m are provided on both sides and street-lighting is present. To the east, Wesley Avenue joins Dean Avenue at an unmarked priority junction."

On this occasion, the Sanderson measurements are correct. Wesley Avenue is actually 5m wide at its widest point.

What they don't tell you is that the recommended minimum width of estate roads is 5.5m.

That clearly indicates Wesley Avenue was never intended to be part of a wider estate. It was never intended to be the access/egress to and from more buildings.

What it was intended to be was a Cul de Sac, which is why there has never been an access into this new proposed development site from the end of Wesley Avenue.

Wesley Avenue, therefore, is totally unsuitable as an access to this development.

This point is acutely emphasised when you consider the amount of traffic the developers admit they will be catering for, even if the initial plan remains at 36 homes (which it won't if planning

permission is granted).

Example, section 4.2.2 (Sanderson) states:

"Each of the 4-bed dwellings is to be provided with the space to park three vehicles in the form of two parking spaces and a single garage measuring 6m x 3m. Each 3-bed dwelling is to have a minimum of two parking spaces with eight of the 'F' plot types also showing a single garage. The 2-bed dwellings are all to be provided with two parking spaces. This is in line with the guidance shown in figure 4 (Kirklees recommendation)." With five four-bed properties planned, along with 22 three-beds and nine two-beds - plus seven visitor parking spaces - that means the developers are already providing parking for an extra 84 vehicles.

That's 84 extra vehicles, with all their noise and pollution, moving in and out of Wesley Avenue, which was never intended to handle anywhere near that amount of traffic as a cul-de-sac.

Again, this underlines Wesley Avenue is a totally unsuitable access.

It also illustrates another 84 vehicles on the narrow lanes of Netherthong will create a significant extra danger to pedestrians and anyone brave enough to get on a bicycle in this area. The impact on the road network would be incredibly bad.

Example, section 8.7 (Sanderson) states:

"It is not considered that the development would have an unacceptable impact on highway safety and the residual cumulative impacts on the road network would not be severe. Therefore, in accordance with NPPF, this development should be supported on highways grounds."

Quite the opposite is the case.

The dangerous 'pinch-point' junction at the bottom of Dean Avenue has already been highlighted, and it should also be noted that the roads off that junction - Miry Lane, Giles Street and Dean Brook Road (apart from in front of the homes on the old mill site, where the pavement is often filled with parked vehicles) - do not have pavements. So extra vehicles are bound to bring more danger.

New Road, Moor Lane, Thong Lane and Dean Brook Road would be considered the four main routes into Netherthong (Miry Lane is steep, basically single lane and currently closed while another development is being built)

None of these routes into the village have pavements either and, with high walls in many places and few escape points for pedestrians or cyclists, they are already dangerous. That is particularly so down Thong Lane and Dean Brook Road, which many youngsters use as routes to Holmfirth High School.

Example from the National Planning Policy Framework:

"Chapter 9 of the NPPF refers to highways matters with para 109 advising that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

I would suggest the above information clearly indicates this application will severely impact on the road network and should be rejected on that basis alone.

The developer and Sanderson saying "It is considered the proposal will not give rise to any highway safety or capacity issues" clearly does not stack up.

They also talk of "modest trip generation" which will have "no material adverse impact on the existing highway network".

This is a nonsense with around 84 more vehicles (and probably more) using an unsuitable access route and funnelling out onto the narrow and congested lanes around the village, with the obvious extra danger that brings (already detailed above).

Further to the road safety issues, Sanderson again must be questioned.

Example, section 3.4.1 (Sanderson) states:

"Road traffic collision data has been obtained from the Crashmap database for the most recent 5 year period available (2014-2018)."

The tacit admission here is the information used is two years old and in no way reflects the highway safety issues we currently have in the village - particularly since the building of The Orchards development and the ongoing new estate off Miry Lane (more than 70 new homes in total) - and these are safety issues highlighted in many complaints so far and witnessed on a daily basis by Netherthong residents and visitors alike.

Further to the safety issues, the developer and Sanderson provide information which suggests the new development would be utopia in terms of walking and cycling access.

Example, section 5.2.1 (Sanderson) states:

"Walking is the most important mode of transport at the local level and can replace short car trips for journeys under 2km, which contribute to congestion and pollution, and the need for car parking." Then section 5.2.4 provides a "summary of some of some of the services and amenities that fall within the preferred maximum walking distance", including the limited amenities in the village, Holmfirth Centre, Thongsbridge Tennis and Fitness Club, medical and supermarket sites. The problem is that all of these mean negotiating the steep, narrow lanes of the village like the dangerous junction at the bottom of Dean Avenue, Miry Lane, Giles Street, Outlane, Church Street or Moor Lane, before tackling the equally treacherous Dean Brook Road, Thong Lane or New Road - all without pavements - to get anywhere near the destinations in question.

Then we come to cycling.

Example, section 5.3.1 (Sanderson) states:

"Like walking, cycling has an important part to play in reducing congestion, improving accessibility and reducing pollution. Cycling is also linked to increased general health and fitness which has personal benefits as well as economic benefits in terms of health service costs. The bicycle is generally more affordable than the car and hence there are financial benefits to the promotion of cycling. Cycling may also allow people without cars to reach destinations that they may otherwise be unable to reach. Cycling has the potential to substitute for short car trips, particularly those under 5km and to form part of a longer public transport trip."

While that all sounds wonderful, it is completely fanciful. As stated above, the lanes and roads around Netherthong are narrow, often steep, have few if any pavements and are congested - so totally unsuitable for cycling.

Example, section 5.3.6 (Sanderson) states:

"It is considered that the sites proximity to surrounding local centres and facilities along with the available cycle infrastructure provides adequate incentive to encourage future residents to travel by cycle."

Again, this is completely fanciful. Indeed the TRICS information supplied by Sanderson to back up their Multi-Modal transport data appears to have been collected largely from very flat areas of the country, bearing no resemblance to the situation in Netherthong.

Then there is more inaccuracy from Sanderson when talking about cycling further afield, towards Huddersfield.

Example, section 5.3.3 states:

"Figure 6 identifies that both Holmfirth and Meltham are located within the 5km cycling radius of the site. Slaithwaite, Milnsbridge, Paddock, Moldgreen, Almondbury, Shelley and Shepley are all located within the 7.5km cycling radius. Huddersfield town centre falls on the edge of the 7.5km cycling radius, which equates to a 31 minute ride via the A616."

The A616 is actually the road which goes from Honley through Brockholes to New Mill, not up the Netherthong side of the valley towards Holmfirth.

The A616 only starts at the Honley junction with the A6024, so any cyclist from the development off Wesley Avenue would have to negotiate the dangerous village lanes and then exit routes - Dean Brook Road, Thong Lane or New Road - before encountering the busy A6024 to even get to the A616 trumpeted by Sanderson.

Public transport is also an issue.

The developer and Sanderson point to bus services 308, 309 and 335 and, interestingly, the fact they don't make any comment on the limited frequency of the services speaks volumes for how poor the bus service to the village actually is.

Only one bus would get any commuters to Huddersfield for what might be considered the start to a 'normal' working day, while the last bus leaving Huddersfield is at 5.20pm and there is no evening service.

At best the services run only hourly, while the 309 is scheduled just twice a day.

So it's no surprise the developer would not want to draw attention to this woeful service, because they realise people are basically bound to use cars.

Despite all the above, we are asked to believe the following:

Example, section 5.6.1 (Sanderson) states:

"It is considered that the sites location provides reasonable opportunities to travel sustainably. As such, residents and visitors to the development will have a realistic choice of sustainable travel options which will reduce the need to travel by car."

Residents and visitors know this is completely unrepresentative of the actual situation.

Walking and cycling are extremely hazardous in and around Netherthong while the developer even appears to acknowledge the bus service isn't worth talking about.

The upshot of all this is that the vast majority of new residents on the proposed site off Wesley Avenue WILL TRAVEL BY CAR - highlighting the narrow Wesley Avenue is a totally unsuitable access, would be chaotic at peak times, the lanes and roads around the proposed site will be severely impacted and the safety of those in the village already will be put at greater risk.

The comments of Holme Valley Parish Council - people who actually know the area - are significant.

They are opposed to this development because of the access. They state:

"Object over access to the site from Wesley Avenue and adequacy of local highways and infrastructure (for cars and pedestrians). The historic centre of Netherthong is narrow and constricted and effective traffic flow will be compromised given increased incremental traffic flow. Members further raised concerns around drainage."

And historically, this site has been previously rejected, with access being a key in both cases. Note previous decisions to refuse development on this site:

1980 - Department of Environment (T/APP/5113/A/79/2558/G2) on the grounds that the roads within Netherthong were too narrow and any increase in the number of vehicles using these roads could result in the risk of greater problems between pedestrians and vehicles.

1976 - Planning application was declined (APP/5113/A/76/1174) on the grounds that it would be injurious to the rural character of the area; insufficient access from the existing streets and that the road to the side of the site is incapable of taking the increased traffic that new development would bring.

That final statement above says it all about this access being totally unacceptable.

Can I remind you of the NPPF:

"**Chapter 9 of the NPPF refers** to highways matters with para 109 advising that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

Again, the application should be rejected because the access and surrounding lanes are simply not suitable.

With regard to the Health Impact Assessment, or lack of one at this stage, the Kirklees Policy LP47 relates to 'healthy, safe and active lifestyles' and seeks to create an environment which supports healthy, active and safe communities and reduces inequality.

Should this planning application be granted, it will certainly not be a safe community.

Environmentally, this development will also be damaging if it's granted permission.

Example, section 2.2.2 Policy LP1 states that:

"When considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Proposals that accord with the policies in the Kirklees Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."

There are enough material considerations around access, safety in the village and impact on the surrounding highway network to mean this should be rejected, but this plan also fails to deliver environmentally.

Were this application to be approved, increased carbon emissions would mean the equivalent of chopping down 2,880 mature woodland trees and not replacing them for 100 years - that's how bad an impact it would have (see below).

Addressing climate change is one of the core land use planning principles which the NPPF expects to underpin both plan making and decision taking.

On Kirklees own website, the council states: "Climate emergency

"Why we must act now

"We declared a climate emergency in 2019 because we all must take urgent action to improve and protect our environment.

"Greenhouse gases such as carbon dioxide trap heat, helping to warm the globe. The amount of carbon emissions are now causing an overall warming of the planet with corresponding devastating impacts starting to be felt.

"Cases of extreme weather such as heat waves and rainfall are having consequences already in Kirklees with issues such as moorland fires and flooding in particular affecting the region.

"Our 2038 carbon neutral vision

"Our vision is to make Kirklees completely carbon neutral by 2038.

"This will mean carbon emissions from human activities in Kirklees will need to be dramatically reduced to zero with any remaining emissions safely removed from the atmosphere. This can also be referred to as achieving 'net zero' carbon emissions by 2038.

"How will we do this?

"Environmental impact considered in all decisions

"Environmental impact is assessed as part of any Kirklees Council decision."

The question of environmental impact and its effect on climate change has not been correctly addressed in this planning application.

Indeed, there is only one reference - "THEME 9: CLIMATE CHANGE, ENERGY USE AND WASTE MINIMISATION"

This application to build houses on three previously undeveloped wildflower meadow fields, greenfield spaces, which have remained undisturbed for centuries, will have a negative impact on the climate.

On 14 November 2019, Politics Home published an article stating:-

"The construction industry is the largest contributor to UK carbon emissions, directly accounting for 10% of the country's emissions and influencing a massive 47% of all emissions through related work...It will be impossible to reach the UK's world-leading target of net zero emissions of global warming gases by 2050 if industry continues to operate in the same way, warns the NFB (National Federation of Builders) report."

According to Green Energy Consulting, one broad leaf tree will, on average, absorb in the region of 1 tonne of carbon dioxide during its full life-time (approximately 100 years). This means that if the proposed 36 houses are built, the increased carbon emissions would be the equivalent to chopping down 2,880 mature woodland trees and then not replacing them during the next 100 years.

This cannot be acceptable to the Council or to the residents of Netherthong