

Victor Grayson
Development Control
Investment and Regeneration Service
Kirklees Council
PO Box B93
Civic Centre III
Market Street
Huddersfield
HD1 2JR

27th August 2020

Dear Victor,

**RE: PLANNING APPLICATION REFERENCE 2020/60/92331/E
OUTLINE PLANNING APPLICATION FOR DEMOLITION OF EXISTING
DWELLINGS AND DEVELOPMENT OF PHASED, MIXED USE SCHEME
COMPRISING RESIDENTIAL DEVELOPMENT (UP TO 1,354 DWELLINGS),
EMPLOYMENT DEVELOPMENT (UP TO 35 HECTARES OF B1(PART A AND
C), B2, B8 USES), RESIDENTIAL INSTITUTION (C2) DEVELOPMENT (UP TO 1
HECTARE), A LOCAL CENTRE (COMPRISING A1/A2/A3/A4/A5/D1/D2 USES), A
2 FORM ENTRY PRIMARY SCHOOL INCLUDING EARLY YEARS PROVISION,
GREEN SPACE, ACCESS AND OTHER ASSOCIATED INFRASTRUCTURE AT
LAND EAST OF, LEEDS ROAD, CHIDSWELL, SHAW CROSS, DEWSBURY**

has been instructed by our client, to submit a **CONDITIONAL SUPPORT** on its behalf, in relation to the above application. This is conditional in relation to the potential traffic impact of the above development on the existing highway network and the lack of adequate mitigation proposed for the impact of that development traffic. would be happy to engage in further discussions with both Kirklees Council, and Applicant, to address these concerns, however, in the absence of complete Transport Assessment (TA) and therefore potentially the lack of a suitable mitigation package for the development traffic, conditionally support the above application.

Justification

The Site Allocation Plan (SAP) was adopted by Leeds City Council on 10 July 2019. The SAP identifies sites for housing, employment, retail and greenspace to ensure that enough land is available in appropriate locations to meet the growth targets set out in the Core Strategy.

I have an interest in a strategic employment development at Capitol Park, Leeds, which has been allocated through the Leeds SAP. The Policy wording in the Leeds SAP sets out requirements for each Site in which their proposed development will cause a cumulative impact upon Tingley roundabout. In order to mitigate this impact, a contribution will be required towards any improvements agreed with Highways England, **taking into account the cumulative impact of other allocated sites in the area.**

I have liaised with Highways England, Leeds City Council and Kirklees Council, in respect of all Local Plan allocations in the vicinity of M62 J28 and the need for a cumulative assessment of the impacts of these developments, at the motorway junction. This includes the site, subject to this planning application.

It is noted that the Transport Assessment, submitted in support of the planning application (prepared by Pell Frishmann, report ref: A13398/VAA and dated 15 May 2020) states:

- At Paragraph 6.12 – further modelling to establish the impacts of the development proposals on the A653 Dewsbury Road corridor within Leeds City Council’s administrative areas has been requested by LCC. The requested work is not presented in the submitted TA and the authors acknowledge that this will need to follow as part of a TA Addendum report in due course.
- Paragraph 6.35 lists a number of committed developments within Leeds which LCC has requested be explicitly included as part of the baseline position against which these development proposals should be assessed. Paragraph 6.36 confirms that, presently, the committed developments identified by LCC have not been considered. Rather, the Applicant’s consultants propose to present an updated assessment as part of the aforementioned TA Addendum.
- Paragraph 6.26 lists the various assessment scenarios which have been considered by the Applicant’s consultants. An assessment of the cumulative effects of planned development sites

in both Kirklees and Leeds on the operation of M62 Junction 28 is required by Highways England, LCC and your own Council and has not been conducted. Again, the authors acknowledge this to be the case (at Paragraphs 1.11 and 6.15).

It is also notable that the assessment of M62 Junction 28 that is presented in the submitted TA has been undertaken using LinSig software, whereas Highways England has requested it be modelled using TRANSYT software and using a base model developed by HE and LCC. Pell Frishmann acknowledge at Paragraph 6.15 of the submitted TA that further assessment work using the TRANSYT model will be needed.

It is therefore clear that the submitted TA is incomplete and does not yet provide sufficient information for the merits of the development proposals to be fully considered.

transport consultants, i-Transport LLP, have engaged with Pell Frishmann and note that they have recently submitted a technical scoping paper to the three highway authorities relating to the necessary cumulative traffic assessment at M62 Junction 28. Feedback from the three highway authorities to that scoping paper is awaited, however is supportive, in principle, of the approach outlined therein.

We request the opportunity to be granted a reasonable period of time to review the further modelling work (and TA Addendum) when it is submitted and reserve the right to make further detailed comments, at that stage.

In light of the above, we would welcome your confirmation that you will be going back to the applicant to update their Transport Assessment, in line with the above comments, and that you will be seeking appropriate highway mitigation measures to address the impact of their development.