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Chris Dowes
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Dear Chris,

PLANNING APPLICATION REF: 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

PLANNING APPLICATION REF: 2020/60/92350/E

Outline application for residential development (Use Class C3) of up to 181 dwellings, engineering and site works, demolition of existing property, landscaping, drainage and other associated infrastructure

Thank you for consulting with the West Yorkshire Combined Authority on these applications. We apologise for the delay in sending these comments. Given the proximity of these site we have provide a single response for both sites.

City Region Context

The Combined Authority and the Leeds City Region Enterprise Partnership (LEP) have a shared economic vision for economic growth throughout the Leeds City Region (LCR) and work closely with our partners to deliver a shared Strategic Economic Plan (SEP). The Combined Authority is also responsible for the West Yorkshire Transport Strategy (WYTS).

The SEP is based on a vision to 'unlock the potential of the City Region, developing an economic powerhouse that will create jobs and prosperity'. Enhanced housing

and employment growth are central to this ambition. The SEP aims to build on the existing market strengths and promote delivery of strategic development opportunities across the City Region in the longer term.

Alignment with the SEP and WYTS

The development locations are both within the North Kirklees Growth Zone cluster on the Chidswell Spatial Priority Area (SPA). This location has been identified as a key site within the district with significant potential for growth in jobs, businesses and housing with the potential to make a significant contribution to the housing targets for the City Region.

We therefore support the principle of mixed-use development in this location and the significant contribution it will make to increasing house growth and employment opportunities within North Kirklees and the wider City Region.

The WYTS has been developed to, in part, ensure that the anticipated growth in the LCR set out in the SEP can be achieved in a sustainable way. The WYTS aims to set the policy framework to promote new journeys to be made in full or part by sustainable transport, using rail, bus and new technologies, and by cycling and walking, or combinations of these modes.

Transport Comments

To achieve the region's ambitions around cutting carbon, improving air quality and addressing the climate emergency, new developments have an important role in shaping places that are not car dominated to places which offer real alternatives for people which includes high quality bus services and rail connectivity as well as active travel modes where possible.

The Transport Assessment (TA) provides a detailed summary of the existing public transport conditions at the site. With respect to bus provision the TA concludes that the Site is currently well served by public transport. The TA goes on to state that:

'...given the large number of new residents and employees on the Site, and the associated growing demand for sustainable travel options, would encourage commercial operators to seek to run additional services. Furthermore, the internal Spine Road has been designed to accommodate the potential provision of bus services in the future. This would bring all but the most distant extents of the Site to within 400m range of bus services.'

This statement appears to be contradictory to the wider conclusion that the site is well served by public transport.

Given the size of the site, it is inevitable that parts of the site will not be within the 400m range of existing bus services. This is acknowledged by the applicant and we welcome the inclusion of the enabling infrastructure to allow buses to access the site. Regarding the access for buses to the site being from point 3 to 5 of the masterplan, has thought been given to buses serving the employment space too as this appears to have been overlooked. Allowing buses through the road marked

'internal vehicular connection' in the masterplan and through access point 2 would be an ideal opportunity to connect jobseekers with employment opportunities by bus.

The drawings are not particularly clear on what infrastructure there would be for buses within the site. The applicant needs to identify where the bus stops planned on the through route will be located and consider bus laybys (particularly relevant near the local centre).

The TA states that '*...the Applicant proposes to engage with local public transport operators to establish the commercial feasibility of bringing services into the Site in the future.*' The applicant appears to be placing a significant reliance on changes to the commercial bus network to improve the accessibility of the site. Discussions with operators to assess the feasibility and viability of bus services should form part of the application process in order for any mitigation (ie bus service funding) to be secured through the planning process and not wait until an undefined point in the future to engage with bus operators.

The main operator in the vicinity of the site is Arriva. Their core offer in the area is the premium 202/203 service every 15 minutes between Leeds, Dewsbury and Huddersfield. This service is part of their 'MAX' standard high-specification double decker buses on this route with e-leather seats, complimentary WiFi and at-seat USB chargers. This service is the most direct bus route between Dewsbury and Leeds, and journeys direct between the two destinations account for a significant proportion of its usage. As such, Arriva have advised that they are keen to keep any deviations from the main Leeds Road to an absolute minimum. There are already two variations to the route between Leeds and Dewsbury, with the 202 serving the Bennett Lane area and the 203 serving the Bywell Road area.

In its current form, Arriva have advised that they would not feel it appropriate to further divert either variation of this service into the new development given the added journey time and the inconvenience to existing customers.

In addition, Arriva complement their core offer with other services which provide more localised connections, generally running every hour. These services are essential in connecting parts of the network that do not fall on an arterial route and will not benefit from a core bus corridor. Service 117 passes the development along Leeds Road, before continuing to Leeds via West Ardsley and the White Rose Shopping Centre. Arriva have advised that they could consider diverting this service into the development, but this would require additional funding as there is not any time available within the cycle of buses on the route to allow for this.

Service 205 passes the development along Leeds Road, before continuing to Dewsbury. Again, Arriva have advised that they could consider diverting this service into the development, although the operational span-of-day is limited with infrequent peak-time connections.

Arriva have advised that for a development of this size, a service at least every 30 minutes through Monday to Saturday and hourly during evenings and Sundays to local key trip generators would be appropriate. In this area they recommend that a service every 30-minutes between Leeds and Dewsbury via White Rose shopping

centre. An indicative cost for providing such a service would be around £650,000 per annum. By making some network alterations in the area, they believe that they could reduce costs to around £300,000 per annum. The Combined Authority and Arriva would be happy to discuss ways in which a pump-prime funding solution could make this a self-sustaining commercially viable service after a short-term initial funding period.

The use of discounted MCards are supported at new residential developments but these are supplementary measures to influence travel behaviour and should not be prioritised over service provision. Without a bus service penetrating the development, the take-up and use of discounted MCards will be extremely limited.

Bus operators have flagged up an increased volume of traffic is a concern for existing bus services passing the development along Leeds Road, and have suggested additional bus priority measures for Leeds Road to ensure there is no consequential delay in bus services because of increased congestion. Any increase in traffic without appropriate mitigation could result in increased bus journey times and reduced service frequencies (to allow resource to be redirected into running times). Operators have suggested bus lanes on the approach to, and traffic light priority for buses at, the junctions of the A653 with Heybeck Lane, Rein Road and Tingley Interchange.

I trust these comments will be useful in your appraisal of the application. We look forward to working with the council and applicant to address the comments in this response.

Yours sincerely

Michael Long
Policy Officer – Planning Coordination