

Pell Frischmann		Project No. A13398/VAA
		Version No. Final 1
TECHNICAL NOTE	Project Land to the East of Leeds Road and Land at Heybeck Lane, Chidswell, Dewsbury	Date 16/09/2020
	Subject Response to Kirklees Council (KC) M62 Junction 28 Scoping Response	By Chkd CJO SME

1 Introduction

- 1.1 Pell Frischmann is commissioned by C.C. Projects (the 'Applicant') to provide transport planning and highways consultancy services in connection with the Proposed Development of Land to the East of Leeds Road and Land at Heybeck Lane, Chidswell, Dewsbury (the 'sites') (Kirklees Local Plan site ID: MXS7).
- 1.2 The Proposed Development site is split into two development parcels, referred to as 'Land at Heybeck Lane' ('Site A') and 'Land to the East of Leeds Road' ('Site B'). Site A and Site B are the subject of separate outline planning applications that have been submitted in parallel to Kirklees Council (KC) in their position as the Local Planning Authority (LPA).
- 1.3 Site A, to be accessed from Heybeck Lane, is proposed to comprise up to 181 residential dwellings (C3 Use Class) with associated access and landscaping. Site B, to be accessed from Leeds Road, Chidswell Lane and a new access from Owl Lane (via the adjacent site HS47 being promoted by Barratt David Wilson Homes), is proposed to comprise up to 35 hectares (ha) (equal to up to 122,500 square metres [m²]) of employment space (mixed B1(a) / B1(c) / B2 / B8 Use Classes); up to 1,354 residential dwellings (C3 Use Class); a new two-form entry (2FE) primary school; a new local centre (including community facilities); and associated accesses and landscaping.
- 1.4 As a part of the planning submissions, a Transport Assessment (TA) and associated documents were prepared to assess the individual and combined impacts of the Proposed Development. These documents, and the scoping documents that inform them, have been submitted to KC in their role as LPA and as Local Highway Authority (LHA). In addition to KC, Highways England (HE) are expected to review the planning applications as Highways Authority for the Strategic Road Network (SRN), which includes the nearby M1 and M62 motorways. Leeds City Council (LCC) and Wakefield Council (WC) are neighbouring local planning and local highway authorities and were also approached during the course of pre-application scoping discussions.

2 Scope of Technical Note

- 2.1 During pre-application scoping discussions, HE raised issues with regards to the expected future capability of M62 Junction 28 (Tingley Interchange; herein 'J28') to accommodate the cumulative effects of Local Plan developments across the wider Kirklees and Leeds areas.
- 2.2 Pell Frischmann produced and issued a Scoping Report in July 2020 to propose a methodology for the assessment of the cumulative impacts at the motorway junction of the Applicant's sites, and the other identified cumulative development sites including the proposed development at Capitol Park East being promoted by Sterling Capitol. The Scoping Report detailed a series of items requiring responses and agreement.
- 2.3 KC commissioned AECOM to review the Scoping Report and provide commentary and recommendations as to the acceptability of the items specified. KC provided this response to Pell Frischmann on 3 September 2020.

- 2.4 Broadly, the principle of the proposed methodology is noted as being acceptable/agreeable to KC and we welcome this supportive and collaborative response. There are, however, a number of items with more detailed comments and requests for further information. This Technical Note addresses and provides an initial response to those items. Items which have been noted by KC as being in agreement have been excluded from this Technical Note for conciseness.

3 Items requiring comment/response

Future year

- 3.1 **Item for consideration:** *“Agreement of all parties to future year of 2032 (based full extent of KC and LCC Local Plan growth plans)”*
- 3.2 **KC Response:** *“2032 has been selected by Pell Frischmann for the future year assessment primarily based on this being approximately the end of the Kirklees and Leeds Local Plan periods. However, the realistic worst case for full build out of the development should be the primary determining factor. It would seem most optimistic for this development to start to deliver houses in 2022 which leaves 10 years for full build out at a rate of 153 houses per year. It needs to be demonstrated that this build out rate is achievable and therefore whether 2032 is the realistic worst case.”*
- 3.3 In accordance with the KC adopted Local Plan and in line with other documentation and technical assessments submitted as part of the two outline planning applications for the Applicant’s sites, it is fully expected that the Proposed Development across Sites A and B would be completed prior to 2032. This is also consistent with the assumption contained in the submitted Pell Frischmann Transport Assessment (TA) that the Proposed Development would be completed by a forecast future year of 2030, as agreed with KC and HE officers.

Additional scenario

- 3.4 **Item for consideration:** *“Agreement of all parties to the total of 6 traffic flow scenarios (i.e. weekday AM and PM peaks for each of the 3 specified scenarios)”*
- 3.5 **KC Response:** *“Table 1.1 in the Scoping Report sets out three specified scenarios as 2019 baseline, 2032 background and 2032 with development. The traditional approach would be for 2032 background to include KC and LCC committed development sites. None of the scenarios presented currently identify the impact of the Chidswell development.

It is recommended that a 4th scenario is added of 2032 base plus committed.”*
- 3.6 Given the relatively tightly-scoped nature of the M62 Junction 28 assessment focussed on determining proportion of impact, we did not propose a scenario isolating the Applicant’s Proposed Development as it is simply one of the number of cumulative developments to be considered. However, we recognise there is a specific value to KC in identifying the isolated impact of the Proposed Development for their planning determination purposes and, therefore, we will include an additional fourth scenario including all but the Proposed Development, as recommended.

Complexity of TEMPRO use

- 3.7 **Item for consideration:** *“Agreement of all parties to the principle of the use of TEMPRO ‘alternative planning assumptions’ to discount applicants’ and cumulative development growth from TEMPRO-derived growth factors.”*
- 3.8 **KC Response:** *“Why make it so complicated. A more transparent option would be to calculate the future year baseline (derived from 2019 count plus TEMPRO growth) then simply remove the Chidswell and Capitol Park generations from it.”*
- 3.9 The proposed methodology is essentially that specified in WebTAG Unit M4 Paragraph 7.3.7. The intent of this being to avoid double-counting of those trips being accounted for specifically by our cumulative developments.

- 3.10 We have yet to receive feedback on the Scoping Report from HE or LCC, and so will keep from making any methodological changes until all the feedback can be reviewed and weighed. However we welcome the potential to appropriately reduce complexity. Given KC's proposed methodology should (in principle) result in a similar outcome, we are content to make this simplification if supported by the relevant authorities.

Consistency of methodology with TA

- 3.11 **Item for consideration:** *“Provision by KC of a list of required cumulative development sites in the KC local planning authority area.”*

- 3.12 **KC Response:** *“There does need to be consistency of methodology between the main TA and this additional cumulative assessment. Both must use the same Kirklees committed development sites otherwise it will lead to confusion and raise questions about the validity of the assessments.*

The list of sites potentially impacting on M62 J28 are as follows:

[Tabulated details of sites KC ref: MXS7, HS47 and HS61 not replicated here but the same as those informing the Scoping Report]

Notes;

With regards to traffic flows from the above sites at M62 J28; we have received an application for HS47, currently undetermined, which indicates two-way traffic flows at J28 of 27 and 26 respectively in the AM and PM peak periods.

To date we have not received planning applications for HS61 and have no agreed details regarding traffic flows at J28. It may be possible to determine indicative flows at J28 using the Kirklees SATURN model.”

- 3.13 The committed development sites for the Proposed Development's TA were defined as those in the KC Local Plan and were captured as part of the underpinning growth forecasts inherent in KC's SATURN model (itself developed to support the Local Plan). Except for the specific consideration of the turning counts on the proposed new roundabout on Owl Lane by HS47 (an exercise undertaken due to a lack of detail in the SATURN model), all committed developments were captured as part of growth in the TA entirely and exclusively by virtue of the SATURN model forecasts. This ensured consistency between junctions analysed.
- 3.14 The committed developments required as a part of this assessment process by KC are defined parts of the KC Local Plan and were therefore captured in those SATURN model forecasts. Consequently, the Kirklees cumulative developments in the TA, those specified in the Scoping Report and in KC's Scoping Report Response are equivalent.
- 3.15 With regard to the noted flows from HS47, we propose to use the distributions defined in that development's TA (specifically Appendix D) in line with the Scoping Report's methodology. These were determined in that TA through an Office for National Statistics (ONS) 2011 Census Journey to Work distribution exercise broadly equivalent to that proposed for this assessment and is considered suitable.
- 3.16 With regard to HS61, we intend to apply a Census Journey to Work distribution in line with the Scoping Report methodology so as to provide methodological consistency across the cumulative developments considered. HS61 would have been accounted for in the KC SATURN model by virtue of being a Local Plan defined development. However, as this junction assessment exercise has arisen (in part) because use of the SATURN model was not considered on its own appropriate for M62 Junction 28, we consider that a 'first principles' distribution in line with the other cumulative developments is more likely to be acceptable to the various stakeholders as a whole.

Additional information regarding trip distribution

- 3.17 **Item for consideration:** *“Agreement of all parties that the Transport Assessment (and associated documentation) related to the Applicant's Proposed Development is acceptable with regard to trip*

generation estimates, mode share estimates, trip distributions and therefore development uplift flows for the future scenarios in which the complete and operational development is included.”

- 3.18 **KC Response:** *“A detailed review of the draft Transport Assessment for Land to the East of Leeds Road and Land at Heybeck Lane, Chidswell, Dewsbury has been undertaken by AECOM. This found that the person trip rates and vehicle trip rates were acceptable. However, there was not enough detail provided to allow a full review of the distribution and assignment of vehicle trips to the highway network.*

Until a high-level distribution plan is provided, a justification for the routes used between the site and the origin / destination of trips and network diagrams to quantify the quantum of development trips per route, this point cannot be agreed.”

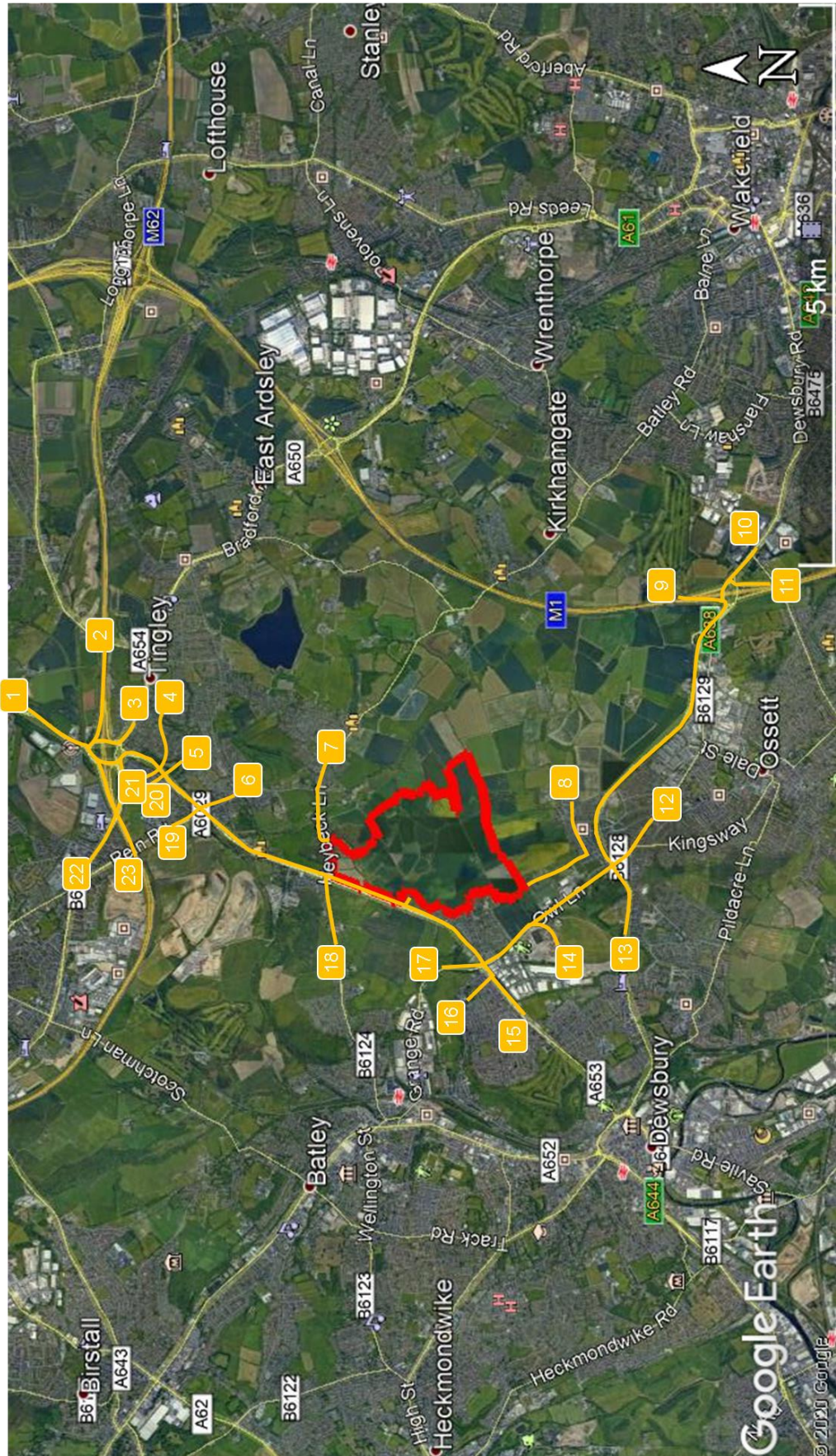
- 3.19 As will have been noted by AECOM, Appendix E of the TA detailed the Census Journey to Work information and route assignments used by Pell Frischmann in the traffic analysis work presented in the TA. However, a plan showing the physical route against which each route identifier applies was omitted. Routes 1, 2, 3, 22 and 23 (J28 arms clockwise from north) are relevant in this case and are shown in Figure 3.1.

- 3.20 **Item for consideration:** *“Agreement of all parties that no further adjustments are necessary or proposed for development trips relating to the applicants’ proposed developments.”*

- 3.21 **KC Response:** *“Until a high-level distribution plan is provided, a justification for the routes used between the site and the origin / destination of trips and network diagrams to quantify the quantum of development trips per route, this point cannot be agreed.”*

- 3.22 Please see our response to the previous item.

Figure 3.1: Routing IDs to/from MXS7 used in Pell Frischmann TA submission Appendix E



4 Conclusion

- 4.1 We welcome the agreement, comments and suggestions put forward by KC in the ‘Review of M62 J28 Cumulative Assessment Scoping’ technical note. We have indicated above our responses to those outstanding points and we consider that these have now been suitably addressed.
- 4.2 Should there be further (or emerging) items of clarification necessary, we remain ready and willing to engage with KC and the other stakeholders to ensure, as far as possible, a mutually acceptable assessment.