



## National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Simon Boyle (Regional Director)  
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[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** 2023/91812

**Location:** Railway line and associated land between, Huddersfield and Westtown (Dewsbury), within the Order Limits of The Network Rail (Huddersfield to Westtown (Dewsbury), Improvements Order 2022

**Proposal:** Discharge of conditions 5, 6, 7, 10, 12, 16 of the Deemed Planning Permission granted by the Department for Transport in relation to The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements Order 2022, Stage 4 of the Development

**National Highways Ref:** NH/23/01656

Referring to the consultation on a planning application dated 28 June 2023 referenced above, in the vicinity of the M62 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to [Planningyne@nationalhighways.co.uk](mailto:Planningyne@nationalhighways.co.uk).

<b>Date: 11 October 2023</b>	
<b>Name:</b> Paula Bedford	<b>Position:</b> Assistant Spatial Planning Manager
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<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

### **Recommended No Objection**

The CTMP sets out details in relation to Condition 6 of the planning consent with a view to discharging that condition.

National Highways has reviewed the CTMP prepared and submitted by National Rail to discharge Condition 6. In broad terms, it is considered that the contents of the CTMP are acceptable, as it clearly sets out the applicant's approach to construction management, both in terms of the management of construction vehicle movements and construction worker movements.

It is noted that the SRN is not referenced within the CTMP, however, given the location of the site and site compounds, this is not considered to be an issue in terms of assessing the impact of the construction element of the development proposals. Furthermore, given the location of the works – namely railway stations – it is considered by National Highways that there is scope for staff and workers to travel to the sites via train.

The CTMP states that a five-week notice period of Abnormal Indivisible Load (AIL) movements will be provided to the Local Highways Authority; and requirements will also be presented to the established Highways Network Management Group for information.

National Highways would expect that the standard procedures for AIL will be followed by the applicant, however, it is noted that potential carriageway width, height and weight restrictions for the movement of such vehicles will need to be discussed and agreed with National Highways, where routes will utilise the SRN. As such, National Highways would advise that the applicant directly discusses any matters pertaining to AILs with the National Highways Abnormal Indivisible Loads team<sup>2</sup>.

Furthermore, it is stated that the development proposals will seek to reduce dependence on the private car as far as is practicably possible; and the CTMP states that the primary objective of the Staff Travel Plan is to minimise the number of single occupancy car journeys by employees, especially during the peak hours, through actively encouraging the use of more sustainable modes of travel such as

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<sup>2</sup> [AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk](mailto:AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk)

walking, cycling, public transport and car sharing to reflect current policy at both a national and local level. This approach is supported by National Highways.

In addition, it is stated that the benefits of using sustainable modes of travel include:

- Delivery of a long-term commitment to changing travel habits, thus delivering environmental health and road safety improvements;
- Reduction in unnecessary travel to and from the site and ensure that those that must travel do so in a sustainable manner; and
- Minimising the traffic impact of the development on the wider highway network within the Kirklees area.

It is considered by National Highways that this approach will reduce any potential impact at the SRN and is therefore welcomed and supported.

Given the above, National Highways has no objection to the information presented to discharge Condition 6.

I make no further comment on the remaining conditions.

Reason: To ensure the safe and continued operation of the SRN

### **Standing advice to the local planning authority**

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.