

20 Moor Lane
Gomersal
BD19 4LF

Ms. Nina Sayers
Kirklees Council

30.viii.2023

Application 2023/60/92079/E

Dear Ms. Sayers,

I wish to object to this application on grounds of safety, both as it affects existing road users and pedestrians, and as it affects the local environment. I wish to object furthermore on account of the inaccuracies previously identified by my (950020) and others' objections to the previous application **Application 2022/60/92100/E**, none of which have been addressed despite the assurances of the planning officer at the Planning Sub-Committee on 22 June 2023. I wish to add observations of further inaccuracies, some of which are very basic and call into question the ability of Kirklees planning officers to check applications received with accuracy.

I cannot understand why Kirklees planning officers have supported the applicant to submit this further, little revised application when so many of the inaccuracies identified by members of the public during the last consultation are simply repeated. They are non-trivial inaccuracies that should have been identified by the planning officers in the first place. I am left with the distinct impression that, in failing to recognize these inaccuracies and indeed in repeating them in the sub-committee report, such officers are serving the wishes of the applicant rather than the taxpayers.

The markedly greater tenor of anger in the new public objections clearly reflects the way in which the planning officers have simply parroted the applicant's arguments and neglected the public's objections.

1. Highways Safety

This application makes the proposal more dangerous, not less. When in the early 1970s Gomersal Bridge at the bottom of Moor Lane was demolished, the removal of the obstacle to motorists' sightlines it had hitherto presented resulted in increased speeds along the A652 and, correspondingly, accidents at the junction of both sides of Moor Lane and the A652.

This proposal would similarly improve motorists' sightlines along Moor Lane but, far from being a benefit, it would enable increased speeds by those who already use it as a rat-run, making the road more hazardous for residents.

This is because the bend in Moor Lane currently acts as a natural traffic-calming measure: vehicles slow their passage approaching it owing to their perception of a visual obstacle. This application makes no attempt to mitigate the harm that it does to road safety in this respect, and proposes not only to remove this natural traffic-calming measure, but to replace it with black bollards - a deliberate uglification that benefits no one, but also creates a new, less visible highways hazard.

1.1 Highways Safety – Inaccuracy of Plans

The plans use the outdated CAD block "large car 2006". Why has the planner chosen this block, rather than a current one? Why have Kirklees Planning Officers permitted them to do so without comment? Cars are now much larger than they were 18 years ago. Newer CAD blocks are available that reflect the increased average size of cars.

In 2006 SUVs were almost unknown on UK roads. By 2018 they accounted for nearly 1/3 of cars on UK roads, and in 2023 they accounted for over half of new sales. Their width, length, and height is much greater than the average large car of 18 years ago.

Use of an 18-year-old car size on the plans is misleading. It underestimates the margins available for passing and turning, and suggests that there is more space available for safe vehicular movement on Moor Lane than is the case.

It also grossly underestimates the increased risk of fatality. In my objection to the previous application, I pointed out that I commute from and to my home on Moor Lane by bicycle every day, and asked that the safety of cyclists be considered. This was ignored. Yet the risk of fatal injuries is increased by almost 200% when cyclists are hit by the large cars of 2023, compared with those of 2006, owing to their higher bonnet and greater weight [see research by VIAS, the Belgian Road Safety Institute: <https://www.vias.be/fr/newsroom/des-voitures-plus-lourdes-plus-hautes-et-plus-puissantes-pour-une-securite-routiere-a-deux-vitesses-/>]

I ask once again that the risks to locally-resident pedestrians, cyclists, and other road users be assessed using current data rather than the data of 18 years ago, and that such assessments be taken into account in a transparent way in the decision regarding this application.

1.2 Highways Safety – Comparison of Measurements

In 2006, a typical large car such as the Lexus RX Estate had a width of 1845mm.

In 2023, one of the *smallest* large cars we see on Moor Lane is the Range Rover Evoque. Its width is 1904mm.

One of the most common newly-bought family cars we see this year on Moor Lane and throughout Kirklees is the Nissan Navara (width 1920mm), but this is not even one of the most popular new purchases - that would be the Mercedes GLS450 (width 2030mm).

See, for examples of the general trend, <https://www.theguardian.com/business/2023/aug/26/more-than-150-car-models-too-big-for-regular-uk-parking-spaces>

There is a dramatic difference between 2006 and 2023, and it measures 19 centimetres at its popular extreme. Moor Lane is this much narrower than the applicant claims.

This difference should be taken into account in combination with the information on the calculation of splays contained in objection 1004679, to evidence the inadequacy of the submitted plans with respect to highways safety and emergency access.

2. Environment – Flood Risk

The application form asks the question, “Will the proposal increase flood risk elsewhere?”. The applicant has ticked “No”.

GOV.UK’s flood risk map clearly shows that whilst the site itself is at low risk of flooding, the adjacent areas – particularly Moor Lane and Ventnor Close – are at medium risk.

[See: <https://check-long-term-flood-risk.service.gov.uk/map?easting=420786&northing=426758&map=SurfaceWater>]

I am relieved to see that the recently-added Drainage/Foul Sewerage Assessment from Haigh Huddleston (1004971) belatedly contradicts the statement on the application and acknowledges this risk. However, this acknowledgement has been added to the application over five weeks after the public consultation began, after many of the public objections have already been submitted, and with only a week remaining for neighbours to see and comment on it. We are once again reliant on our councillors to call this application in for vote at sub-committee, given that we have been given incomplete and inaccurate information at the start of the consultation.

2.2 Environment - Density

At the outset of the previous application, other nearby applications such as 2022/93344 – ten one-bedroom apartments to be built on the site of the old dancing school on Moor Lane – had not been approved. They now have. I cannot understand how the applicant’s new submission can be permitted to continue to rely upon obsolete underestimates of local density, given that this new information is known to the applicant.

I furthermore hope that at that sub-committee, as at the last, the issue of a conflict of interest is raised. It is inconceivable to me that Kirklees do not comprehend the reputational damage a public perception of a complaisant relationship with a developer may incur. That Kirklees owns both the strip of access land, and the land necessary for drainage and water connexion, and will therefore benefit financially from permitting this application, and has not been transparent about this relation nor disclosed the benefit, does not present a picture of a neutral and impartial arbiter. That so many basic inaccuracies in the application have seemingly passed the Planning Officers’ scrutiny does not commend their abilities to act in our, the taxpayers’ best interests.

Yours sincerely,