



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

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West Yorkshire Combined Authority
40-50 Wellington Street
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Planning Services
Kirklees Council
Via Email

31st January 2024

Dear Sir/Madam,

PLANNING APPLICATION REF: 2023/60/93667/E

WYCA REF: K1015

Proposal: Outline application for demolition of buildings and erection of residential development (up to 261 dwellings), redevelopment of Lodge Cottage for residential use and associated works

Location: Storthes Hall Student Village, Storthes Hall Lane, Kirkburton, Huddersfield, HD8 0WA

Thank you for consulting with the Combined Authority (CA) on this application. We note that the site is identified as a major developed site in the Green Belt under Policy LP59 and allocated under site reference MDGB1.

The site is relatively isolated which is reflected in the 7th bullet point within the site-specific considerations in the Local Plan that states 'Improved access to public transport will be required'. There does not appear to be any firm commitment from the applicant to improve access to public transport as part of this development.

We note that the TA states that 'discussions will be held with the West Yorkshire Combined Authority to determine whether proportionate bus service improvements are feasible'. I can confirm that these discussions have not taken place to date and no quantification of what the applicant considers a proportionate bus service has been provided.

As set out in the Transport Assessment (TA), the site is currently served by the 398-bus service. This service is funded by the University of Huddersfield. It would therefore be a reasonable assumption that this service will not continue to operate if this development was

approved and built and therefore should be discounted in the accessibility assessment for the application.

The other bus services identified in the TA are the 341 and the D2 / D3. All these services are fully or in part funded by the Combined Authority. They are relatively low frequency services and are designed and operated to provide improved access to employment and amenities where there are no commercially operated buses, providing links to often isolated communities and places.

In order to achieve the region's ambitions to reduce carbon emissions, improve air quality and address the climate emergency, new developments play an important role in shaping places that are not car dominated and offer alternatives such as high-quality bus services and rail connectivity, as well as active travel modes where possible. This is reflected in Kirklees Council's Local Plan policies, specifically LP20 Sustainable Travel. For the application to meet the Council's own policy objectives, we recommend that the applicant needs to provide a package of interventions to improve the accessibility of the site.

Key to this, improved bus services are required. As discussed above, the majority of the bus services that currently operate in the vicinity of the site are funded by the Combined Authority. This means that there is scope for the CA to adapt and enhance the routes of these services to serve the site. To enhance the local bus network in this way to serve the site, additional bus resource would be required. At current prices, a single bus costs £200k per bus per annum to operate and we would seek a minimum of 5 years funding, a total of £1m over 5 years. Ideally, we would seek 2 buses for the same period, a total of £2m over 5 years. Our intention would be to use the additional bus to enhance the local network to provide connections to local amenities and key public transport interchange points (such as Stockmoor station for example).

It should be noted that, the minimum bus service level is based on the current bus network.

Additional bus infrastructure would be required on site (depending on the bus routing). We anticipate that 2 bus shelters should be provided (with associated bus stop clearways) equipped with real time information displays. This would cost £23k per shelter.

We note that the application includes a Travel Plan that sets out Travel Plan Measures for the site. In terms of influencing travel behaviour changes, the Travel Plan is focused on information sharing and does not include any incentive schemes or proposals to encourage modal shift.

Along side the bus service interventions suggested, we consider that the applicant should go further and be required to set up and administrate a sustainable travel plan fund. As done in other sites across West Yorkshire, similar funds are common whereby residents are offered financial incentives for sustainable travel measures including MCard public transport passes, cycle vouchers etc. Other Local Authorities use a figure of circa £520 per dwelling to calculate such funds. This is based on the cost of an annual Mcard if purchased through the Residential



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Mcard Scheme. As a fallback position, the site could enter the Residential MCard Scheme which would cost £135,720 if a sustainable travel fund cannot be set up. This is based on a Bus Only Mcard. Given the proximity of Stocksmoor station, the scheme can be upgraded to include rail travel in Zones 2 -5. This would increase the cost of the scheme to £207,689

I trust these comments will be useful in the appraisal of the application. Please contact me if you have any questions or would like to discuss these comments.

Yours sincerely,

Michael Long
Programme Development Lead – Strategic Sites