



## National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Graeme Watt (Head of Planning & Development)  
Operations Directorate  
Yorkshire & Northeast Region  
National Highways

Email: [BMTadminsupt@nationalhighways.co.uk](mailto:BMTadminsupt@nationalhighways.co.uk)

To: Kirklees Council FAO William Simcock  
Email: [dcadmin@kirklees.gov.uk](mailto:dcadmin@kirklees.gov.uk)

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** 2025/92161

**Location:** Land adj, 17, Whitehall Road West, Birkenshaw, BD11 2LS

**Proposal:** Discharge of details reserved by conditions 4-8 (intrusive investigations), 11 (Remediation Strategy and Verification Report ), 12 (CEMP), 13 (noise), 14 (Arboricultural Method Statement), 15 (CMP), 16 (highway), 17 (visibility), 18 (Safety Audit), 19 (estate streets), 20 (waste collection), 21 (surface water attenuation), 24 (bin storage), 25 (bicycle storage), 26 (drainage), 28 (drainage), 29 (CEMP: Biodiversity),-30 (landscape), 34 (solar panel array), 35 (materials), 38 (boundary treatments) on previous permission 2024/92281 for erection of 23 dwellings

**National Highways Ref:** NH/25/12510

Referring to the consultation on a planning application dated 15 August 2025 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 propose not 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 [BMTadminsUPPORT@nationalhighways.co.uk](mailto:BMTadminsUPPORT@nationalhighways.co.uk)

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

**Signature:**

**Date: 13 November 2025**

**Name:** Paula Bedford

**Position:** Planning & Development

**National Highways  
Calder View House  
Wakefield  
WF2 7UA**

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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.

### **Recommend No Objection**

I am content that the recent revisions to the construction environment management plan satisfy the requirements of this condition and therefore offer no objection to this discharge of condition 15.

In addition, I am content that the drainage system, surface water attenuation tank and hydro brake are to be adopted by Yorkshire Water and that an appropriate maintenance and management scheme is to be implemented. As such I offer no objection to the discharge of conditions 21 and 28.

The remaining conditions are not relevant to National Highways

Reasons: In the interest of the safe and efficient operation of the Strategic Road Network, and to protect the integrity of the motorway drainage asset in accordance with DfT Circular 01/2022.

### **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 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.