

From:
Sent: 19 July 2026 21:40
To: DC Admin
Subject: Objection Planning Application 2026/91494 – Land off Penistone Road, Birdsedge, Huddersfield, HD8 8XP

I write to object to this application on highway safety grounds. My objection is directed at the adequacy of the evidence before the Council. The applicant's Transport Statement (Andrew Moseley Associates, May 2026) does not provide the information the Council needs to conclude that the proposed access and the traffic it generates would be safe, and the recent collision record of this stretch of the A629 – including a fatality – directly contradicts its conclusions. The relevant tests are the first limb of paragraph 116 of the National Planning Policy Framework, under which development should be refused where there would be an unacceptable impact on highway safety, and Policy LP21 of the Kirklees Local Plan, which requires proposals to “demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety”. Neither test has been met.

1. The Transport Statement's collision assessment is not adequate information

The entire road safety evidence in the Transport Statement is a desktop search of the free CrashMap website, limited to 400 metres either side of the proposed site access (TS paragraph 2.6.1). It found one slight collision and on that basis concluded, at paragraph 2.6.4, that “additional collision data is not required to be requested from KC given there are no clusters or hotspots identified”. That reasoning is circular: a deliberately narrow search produced little, and the empty result was then used to justify not obtaining the authoritative collision data held by the Council as highway authority.

The 400m study area is not derived from any guidance and was not, so far as the published papers show, agreed with the Council. It excludes the junctions that development traffic will actually use. The Transport Statement itself (paragraph 2.2.4) identifies the A629/A635 junction, approximately 1.2km north of the site, as the route to Huddersfield – the destination for most trips. The A629's junction with Cumberworth Lane/Carr Hill Road, approximately 500 metres from the site, also lies just outside the chosen boundary. No junction other than the proposed access itself has been assessed in any way, yet the report concludes (paragraphs 4.2.5 and 5.1.2) that there will be no material impact on the surrounding highway network. That conclusion is not supported by any evidence in the document.

The data used is also out of date. CrashMap reproduces only police-reported personal injury collisions and lags the present day by a year or more; a report dated May 2026 whose “most recent five-year period” includes an August 2020 collision is plainly not describing the current position. Damage-only collisions and unreported incidents do not appear in it at all.

2. The actual recent record of this stretch of the A629

This section of the A629 contains known accident black spots, recent serious incidents include the following, none of them appears in the Transport Statement:

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- In 2025 a collision at the A629 junction by the Sovereign Inn, approximately 1km from the site, resulted in a fatality. The location is

- marked to this day by a roadside memorial. This fatal collision falls within the five-year assessment period the Transport Statement claims to cover, and was excluded from it only by the self-imposed 400m study boundary.
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- In April 2026, approximately two to three months before this objection, a car overturned on the bend approximately 100 metres from the
- proposed site access. This location is inside the Transport Statement’s own 400m study area, yet the incident is absent from its data – demonstrating that the method used cannot capture the current safety position even within the boundary the applicant chose.
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- On the weekend of 11/12 July 2026, the A629 was closed twice in two days following separate collisions at the Cumberworth Lane/Carr Hill
- Road junction, approximately 500 metres from the site. In both cases vehicles left the carriageway, ran up the bank and demolished dry stone walls.
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These are not isolated events but a pattern: loss-of-control and run-off-road collisions, on bends and at junctions, on the very corridor to which the development would add traffic and turning movements. That pattern is the signature of a vehicle speed problem – which matters directly to this application, as set out below.

3. Consequences for the access design and the assessment

No speed survey has been carried out. The proposed access visibility splays of 2.4m x 43m (TS paragraph 3.2.3) are the Manual for Streets standard for a road on which traffic actually travels at 30mph; they have been assumed from the speed limit, not measured. The Transport Statement’s own description of the road – rumble strips, coloured surfacing, central hatching and school warning signage (paragraph 2.2.3) – records measures introduced precisely because vehicle speeds here are a known problem, and the collision pattern above bears that out as well as regular observation of high speeds on the road by myself and other residents. If measured 85th percentile speeds exceed 30mph, the proposed splays are inadequate and the access is unsafe as designed.

No Stage 1 Road Safety Audit is referenced anywhere in the Transport Statement, despite the proposal comprising a new priority junction with a ghost-island right-turn lane and a pedestrian refuge on a classified A-road.

The interaction with Birdsedge First School has not been assessed. The school stands approximately 50 metres from the proposed access, on the opposite side of the A629. The assessed AM peak (08:00–09:00) coincides with the school run, when children are crossing and vehicles are stopping at the school frontage. The Transport Statement predicts 38 additional vehicle movements in that hour, including 27 departures, but treats the school solely as an accessibility benefit and nowhere considers it as a point of pedestrian/vehicle conflict.

Finally, the traffic assessment is based on 70 dwellings, yet the Planning Statement (paragraph 3.3) states the applicant is “not seeking to fix a quantum of development”. The safety conclusions therefore rest on a figure to which the application does not commit.

4. What the Council should require before determining this application

I respectfully request that the Council, through its Highways Development Management function, requires the applicant to provide the following before this application is determined:

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- An extended collision analysis using the validated STATS19 collision data held by Kirklees Council, covering the A629 corridor from the
- site to and including the A629/A635 junction, and expressly including the Cumberworth Lane/Carr Hill Road junction and the location of the 2025 fatal collision near the Sovereign Inn, together with the most recent available data and verification of the incidents
- listed at section 2 above with West Yorkshire Police.
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- A seven-day automatic traffic count and speed survey on the A629 in the vicinity of the proposed access, with the visibility splays re-validated
- against measured 85th percentile speeds rather than the posted limit.
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- A Stage 1 Road Safety Audit of the proposed access junction, ghost island and pedestrian refuge.
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- An assessment of the interaction between development traffic and Birdsedge First School at school travel times.
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- A stated maximum quantum of development to which the transport assessment applies.
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I also ask that the highways officer's site visit take place during school drop-off (08:30–09:00 on a school day) rather than at a neutral time, and that, given the level of local concern, the application be determined by the Planning Committee rather than under delegated powers.

If the applicant cannot or will not provide this information, the Council will not have the “adequate information” Policy LP21 requires, and cannot rationally conclude that the impact on highway safety is acceptable. In those circumstances the application should be refused under paragraph 116 of the NPPF and Policy LP21 of the Kirklees Local Plan.

Please notify me of the highways consultation response when published, of any committee date, and of the decision.