

Response to SC008 Kirklees Council and Highways England Joint Position Statement

We are amazed that both bodies have concluded that the individual developments are “not considered to have the potential to generate a significant impact on the Strategic Road Network.” Theoretical models are only ever as good as the baseline assumptions and data inputs to the models. It would appear as though, in this instance, the parties have been prepared to change their input assumptions, on site capacity and phasing, in order to deliver the preferred outputs. We are somewhat mystified as to how they can do this, given that there is, as yet, no masterplan for development of the relevant sites.

We are also rather mystified as to how anyone can consider the Local Plan proposals sound, given that:

- The long term “ideal” scheme is unfunded and has been indefinitely postponed
- The interim scheme feasibility study is in its early stages [how do we know it is viable?]
- “Any interim package is unfunded and does not have an identified funding route”

There again, perhaps we should not be surprised, as Kirklees have completely ignored traffic issues on many occasions in the past few years – both in plan making and planning decision taking. One senior member of the Council’s ruling Cabinet has publicly said “If we refused any development on traffic grounds, we would never approve anything”.

This ready dismissal of any and all traffic constraints on development is exemplified in SC008, when it affords strong prominence to the phrase “To ensure viability, the costs of any infrastructure contributions should, when taking account of the normal costs of development and mitigation provide competitive returns to a landowner / developer to enable the development to be deliverable [in accordance with NPPF 173]”. The combined wording and phraseology in SC008 effectively provides developers with more than adequate arguments to avoid making any contribution towards road improvements or mitigation measures.

In this particular instance we find the Council’s “development at all costs” attitude to be completely unacceptable, given that the existing traffic problems around Junction 26 of the M62 are already hugely significant, with extremely long queues frequently stretching back for perhaps a mile along the M62 towards Leeds and the M606 towards Bradford, partially blocking the motorways at rush hour periods.

Whilst we are making these comments in respect of document SC008 we are also aware that the same could be said about virtually all the infrastructure requirements associated with the Local Plan, including Highways, Schools, Health Services, Drainage and Flood prevention. The overall lack of commitment to infrastructure provision is simply not acceptable.