

Stage 3 Hearing Statement – Upper Dearne Valley Environmental Trust
Matter 19 – Transport policies

Issue - Does the Plan set out positively prepared policies for supporting sustainable travel and safe access, which are justified, effective and consistent with national policy?

[Policies PLP 20, 21, 22, 23]

- a) What is the scheme size threshold above which Travel Plans will be required, as set out in Policy PLP 20?

No comment

- b) Is section 2 in Policy PLP 21 justified and sufficiently flexible to allow for mitigation or improvements in the highway network? Is the Council's proposed modification SPMM23 necessary to ensure that the policy is sound?

PLP21/SPMM23 – we have deep concerns about the amendments proposed. Paragraph 2 has been rewritten and effectively diluted so as to focus only on site access and NOT the needs of the wider local road network. The revised wording is too subjective – what constitutes 'severe'? As proposed it is open to different interpretation and inconsistent application in practice.

The essence and intention of the original paragraph needs to be reinstated in our view for soundness. Traffic generated by new developments does not just evaporate once it has left the site entrance.

- c) In what circumstances would be Transport Assessments or Transport Statements be sought, as referred to in Policy PLP 21?

We believe requirement for Transport Assessments/Transport Statements referred to in PLP21(c) should be extended:

a) to reflect emerging National requirements

b) a requirement that these will be independently commissioned by the Council and charged to developers as part of the planning application fee structure. It is well overdue that all reports necessary for any development to take place were truly independent of the developer. There is an opportunity for Kirklees to take the lead in what should be a National requirement.

- d) Is criterion g in Policy PLP 21, relating to the provision of on-site electric charging points, justified and deliverable?

Criterion (g) appears to have been deleted completely from SPMM23. We believe it should be reinstated in the light of recently stated Government policy.

- e) What car parking standards will apply in new development schemes?

We are concerned that the change SPMM24/PLP22 will permit inadequate off road parking provision in rural areas which are badly served by public

transport or where travel to work distances are extensive as in Kirklees Rural. The result could be resident parking spilling onto other roads in the vicinity of new developments.