

**TRANSPORT AND WORKS ACT 1992**  
**TRANSPORT AND WORKS (INQUIRIES PROCEDURES)**  
**RULES 2004**  
**NETWORK RAIL (HUDDERSFIELD TO WESTTOWN**  
**(DEWSBURY) IMPROVEMENTS) ORDER**

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**TRAFFIC AND TRANSPORTATION**  
**PROOF OF EVIDENCE**

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**The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order 5 October 2021**

*Proof of Evidence – Traffic and Transportation*

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# The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order 5 October 2021

## Proof of Evidence – Traffic and Transportation

Abbreviation	Definition
Alliance	Network Rail has commissioned the TRU West Alliance to design and deliver the West of Leeds section of the TRU. The Alliance is made up of the client, principal designer and principal contractor organisations amongst others contributing to the design and delivery of the Scheme.
CoCP	Code of Construction Practice
Code of Construction Practice	The document that outlines how the Scheme will reduce or mitigate construction effects on the environment
CTMP	Construction Traffic Management Plan
Construction Traffic Management Plan	A document which set outs the measures required during construction of the Scheme to reduce the impact on traffic and the local highway network.
Construction Phase	The period in which construction of the Scheme takes place.
Combined Authority	West Yorkshire Combined Authority
DPP	Deemed Planning Permission
Deemed planning permission	On making an order under the Transport and Works Act 1992, the Secretary of State may direct that planning permission shall be deemed to be granted, subject to such conditions (if any) as may be specified in the direction.
EIA	Environmental Impact Assessment
Environmental Impact Assessment	The process by which the anticipated effects on the environment of a proposed development or Scheme are measures
ES	Environmental Statement
Environmental Statement	The report setting out the process and findings of an Environmental Impact Assessment.
Footpath Diversion	Footpaths, bridleways and restricted byways may be diverted by order of a council, under section 119(1) of The Highways Act 1980, if it appears to them to be expedient to do so in the interests of either the owner, lessee or occupier of land crossed by the way or of the public.
HGV	Heavy Goods Vehicle
Heavy Goods Vehicle	A truck that when laden has a total weight of more than 3.5tonnes
Link	Represent sections of road that have the same properties (speed, capacity etc.) along the full length of that section. A road may be represented by one or many sequential model links, depending on whether the properties of the road change at points (modelled notionally as network 'nodes') along it.
Mitigation	Measures identified to reduce potential environmental impacts and effects arising from the construction and or operation of the Scheme.

## The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order 5 October 2021

### *Proof of Evidence – Traffic and Transportation*

NCN	National Cycle Network
NR	Network Rail
Overbridge	An overbridge is defined as a structure which carries a highway, footpath or other amenity over the railway.
PRoW	Public Rights of Way
Public Rights of Way	Paths on which the public have legally protected rights to pass
Route Section	For reporting purposes, the Scheme has been split into six distinct areas (Route Sections) based on geography.
Scheme	The works authorised under the Order and permitted development rights which are referred to in this ES.
TA	Transport Assessment
Transport Assessment	A document which sets out transport issues relating to a proposed development, identifying any significant highway safety issues and providing an analysis of the recent accident history of the affected/impacted areas.
TTRO	Temporary Traffic Regulation Order
TWAO	Transport and Works Act Order The mechanism by which authorisation is given for the construction and operation of certain transport systems, such as railways. An order gives the promoter the necessary powers to put such a Scheme into practice.
Underbridge	A structure which carries the railway over a highway, footpath or other amenity.

## **1. INTRODUCTION**

- 1.1.1 My name is Graham Foulkes. I am a Managing Consultant in Transportation with Atkins. I am a Chartered Transport Planner being a full member of the Chartered Institute of Logistics and Transport since 1995. I graduated from Oxford Brookes University in 1989 with a Bachelor of Arts (BA) degree in Planning Studies and from the University of Salford in 1992 with a Master's Degree (MSc) in Transport Engineering and Planning. I have over 30 years' experience working as a practitioner in transport planning across the UK and Overseas.
- 1.1.2 Atkins has been involved in the development of the traffic and transport aspects of the Order since 2018, developing and refining the strategic traffic model and writing the necessary chapters of the Environmental Statement. I became involved with the Scheme in August 2021 following the departure of another team member.

## **2. STRUCTURE OF THE PROOF OF EVIDENCE**

2.1.1 My Proof of Evidence will consider traffic aspects of construction concerning disruption to Public Rights of Way (PRoW), disruption to bus provision, and how construction will be managed to mitigate the impacts, highlighting residual impacts and how they could be further managed as more detail on the construction plans comes forward.

2.1.2 I will provide evidence on the following topics:

- a. The adequacy of the Environmental Statement for traffic and transport aspects;
- b. The impact on the highway network in terms of disruption due to temporary road closures and the impact of mitigation;
- c. The impact on Public Rights of Way;
- d. The impact on bus services; and
- e. Responses to specific objectors.

### **3. SCOPE OF EVIDENCE**

#### **3.1 Environmental Impact Assessment**

- 3.1.1 The Transpennine Rail Upgrade for the section between Huddersfield and Westtown (Dewsbury) has been subject to an Environmental Impact Assessment (EIA), which is reported in the Environmental Statement (ES). The ES considers Traffic and Transport in Volume 2i, Chapter 14 (NR16A) and a Transport Assessment (TA) in Volume 3 Appendix 14.1 (NR16B). Key aspects of the TA and Traffic and Transport ES Section are presented in this Proof of Evidence.
- 3.1.2 Reference is also made to three Statements of Case; from Network Rail (NR28), from Kirklees Council (OBJ 33) and from the West Yorkshire Combined Authority (OBJ 40).
- 3.1.3 The Traffic and Transport element of the ES and the associated Transport Assessment of the ES have clearly set out the measures to be implemented to overcome pinch points on the highway network during construction, easing the impacts from temporary road width and lane restrictions, and road and Public Rights of Way (PRoW) closures. Measures in the ES are being included in the Order and in contemplation through Construction Traffic Management Plans (CTMPs).

#### ***General traffic and transport study approach***

- 3.1.4 The details of the Traffic and Transport assessment in Chapter 14 of the ES are based on the TA. The TA is a standard, well versed approach to identify and mitigate for the effects of a proposed change that impacts traffic movements. It takes surveyed traffic data, growthed to a future year in line with economic growth, or uses other readily available traffic data and traffic forecasts, to then consider how a traffic network will operate, and adds in the proposed change (i.e. the Scheme) to assess how that operation will be modified. It then goes on to offer mitigation if necessary to return the operation to a pre-change (pre-Scheme) condition.
- 3.1.5 The TA for this Scheme Order uses an existing traffic model provided by Kirklees Council as its starting point. Updates were applied and some revisions to improve outputs in the study area for this Order (including data from the manual and automatic traffic counts undertaken). The change element in this case is the construction works for the Scheme which in some cases temporarily closes roads, reduces lane widths and removes some lanes (the construction proposals are listed in Table 14-7 of the Environmental Statement (ES) (NR16A), Traffic and Transport in Volume 2i, Chapter 14, with the road closures listed in Table 14-9). The TA departs a little from the



standard process in that it includes the mitigation measures in the first instance, such as diversion routes for traffic, as these measures are embedded in the Scheme design. It therefore produces the residual traffic effects of construction.

- 3.1.6 The TA focuses on the construction phase as this is where most of the traffic impacts will occur. In the operation phase the highway network is restored.
- 3.1.7 As the traffic and transport study has used a traffic model a wide range of data is output to inform on impacts to highway network users other than vehicular users, and all outputs are reported in the ES Chapter 14.
- 3.1.8 The mitigation embedded in the Scheme design and the traffic model is in advance of further refinement to be developed with Kirklees Council and West Yorkshire Combined Authority to be contained in Construction Traffic Management Plans for each construction stage, submitted and agreed to by the local authority under and pursuant to proposed Condition 6 of the Deemed Planning Permission (DPP).

#### ***Details of the traffic and transport study***

- 3.1.9 The Traffic and Transport element the associated Transport Assessment of the ES make use of a strategic traffic model, which is a revised and updated version of the Kirklees Traffic Model that was previously developed and provided to this study by Kirklees Council. The revision to the model essentially added detail around the construction Scheme to enable impacts of the works - in terms of highway changes, construction traffic routes and construction staff traffic - to be assessed and how the mitigation, for example, the provision of diversion routes, would assist, as well as correcting some errors.
- 3.1.10 Temporary PRow closures affecting pedestrian routes on footpaths, bridleways and towpaths, and cycle routes including National Cycle Networks (NCNs) 66 and 69, were taken into consideration, for those proposed to be closed for greater than one week.
- 3.1.11 General and residential amenity are considered in terms of the impacts on bus services and general parking provision. Some bus services would be materially affected by diversion routes in some route sections; elsewhere bus services that remain unaltered could be affected by traffic diverting from other closed roads. Parking restrictions displacing parked vehicles may also impact on highway capacity of other roads.
- 3.1.12 Consideration is also made for rail replacement bus services when railway line possessions are necessary. Rail replacement bus services will operate in the

same way as when the railway has previously closed using the same pick-up and drop-off points. Rail Replacement Bus Strategies will be drawn up as part of the Construction Traffic Management Plans.

3.1.13 Existing accident data has been assessed, with the identification of accident clusters. There will be increases in traffic flows (for some links and routes there will also be reductions) including along routes where there are accident clusters. Given that these increases are temporary and construction works including diversion routes will be agreed with the local authority, the construction phase is not anticipated to have a significant impact on highway safety.

3.1.14 Consultation was undertaken during the development of the Transport Assessment with:

- Kirklees Council (Highways officers and Public Rights of Way officers);
- Local cyclist groups affiliated with the Local Highway Authority for the specified study areas;
- Sustrans;
- Peak and Northern Ramblers Association; and
- Canal & River Trust.

3.1.15 This followed the issue of a Transport Scoping Report to Kirklees Council to agree:

- Details of the proposed development set out under the construction and operational phases and including details of:
  - Proposed temporary and permanent closures of roads; and
  - Proposed temporary and permanent closures of PRowS.
- The areas to be covered in the Transport Assessment including:
  - Policy context;
  - Baseline conditions including proposed data collection;
  - Construction phase details and impact assessment;
  - Operational phase details and assessment; and
  - Proposed next steps including a summary of information required from Kirklees Council.

3.1.16 Kirklees Council raised no issues with the approach contained in the scoping report.

3.1.17 The assessment considered the 22 construction compound sites to be of a scale warranting discussion within a Transport Assessment as confirmed in Network Rail's Statement of Case in paragraph 9.3.48 (NR28).

3.1.18 Temporary road closures are proposed as part of the construction phase. Only those that would be in place for greater than one week were taken forward into the Transport Assessment.

3.1.19 The traffic model is formed of a Do-Minimum scenario where the existing highways network and traffic flows are modelled, and Do-Something models reflecting the different packages of construction scenarios. The Do-Something models include temporary road closures, reduced highway widths, lane reductions, construction traffic routeings and vehicle numbers and staff traffic volumes associated with the construction scenarios, as well as the mitigation impacts of diversion routes, such that only residual impacts remain. The construction proposals are listed in Table 14-7 of the Environmental Statement (ES) (NR16A), Traffic and Transport in Volume 2i, Chapter 14, with the road closures listed in Table 14-9 and PRow closures in Table 14-10.

3.1.20 The largest impacts are during the construction phases as this is when most road closures and other temporary and short-term interventions will arise.

3.1.21 The different construction elements were analysed to identify peak periods of construction activity. From this analysis five distinct periods of maximum activity and likely disruption were identified, in summary being:

- Scenario 1 – February/ March 2023;
- Scenario 2 – June/ July 2023;
- Scenario 3 – December 2023/ January 2024;
- Scenario 4 – September/ October 2024; and
- Scenario 5 – September 2025.

3.1.22 The scope of the traffic modelling required for the TA and the traffic element of the ES were agreed with Kirklees Council, specifically the future year for construction impacts – taken as a central year at 2024 – and that no Design Year (beyond 2026) assessment was needed given the very limited impact of the Scheme in the operational phase.

3.1.23 As identified in Chapter 1 of the ES (Vol 2i) (NR16A) the Scheme was separated into six route sections for the purposes of design and the EIA, these being:

- Route Section 1 – Huddersfield;
- Route Section 2 – Hillhouse and Fartown;
- Route Section 3 – Deighton and Bradley;
- Route Section 4 – Colne Bridge and Battyeford;
- Route Section 5 – Mirfield and Lower Hopton; and

- Route Section 6 – Ravensthorpe and Westtown.

3.1.24 Modelling of five construction scenarios as Do-Something scenarios across all six route sections was undertaken to allow modelled trip movements associated with each scenario to be derived, so an order of severity impact could be established of each scenario on each route section. For example, Route Section 1 is impacted to the greatest extent by scenarios 1 and 3, whereas Route Section 4 is impacted to the greatest extent by scenarios 3, 4 and 5.

3.1.25 HGV movements delivering construction materials or equipment were assigned to fixed routes, using a pre-load facility available in the traffic modelling software to prevent these trips being subject to route choice.

3.1.26 For staff traffic, staff arriving at the compound sites are likely to arrive before the morning peak hour and depart after the evening peak hour. For robustness, to consider a worse-case impact, staff in the Transport Assessment are assumed to arrive and depart at the strategic compound sites in the peak hours before being grouped and transferred to the satellite compound sites by minibus (details of which are set out in paragraphs 14.5.7 to 14.5.10 and Table 14-8 in Chapter 14 of Vol 2i of the ES (NR16A)).

3.1.27 Whilst detailed construction information is not available at this stage, the information provided by the Alliance<sup>1</sup> is of sufficient detail for a robust assessment to be undertaken to inform the Environmental Statement, refinement of those construction plans is to follow during subsequent detailed design stages. This refinement will include close liaison with Kirklees Council as the Local Highways Authority, in particular to establish Construction Traffic Management Plans for each stage of the Scheme. It is worth noting here that discussions with WYCA are also planned during this stage to consider the impacts on bus service provision and identify appropriate mitigation measures. The temporary road closures and other measures established for the Environmental Statement are subject to change as efforts are made to minimise their requirement.

3.1.28 Given the scale of the study area, a screening approach laid down by the Institute for Environmental Management and Assessment (IEMA) guidelines was adopted. Highway links showing traffic flows over a 24 hour period which will increase by more than 30% (or the number of Heavy Goods Vehicles (HGVs) will increase by more than 30%) and any other specifically sensitive areas where 24 hour traffic flows will increase by 10% or more are included.

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<sup>1</sup> The Alliance is made up of the client, principal designer and principal contractor organisations amongst others contributing to the design and delivery of the Scheme

The next step was to include any links which are considered as being close to or over highway capacity (operating at 80% of capacity or above in this study). This provided 116 links on which to consider the impacts on driver delay, pedestrian and cyclist delay, and accidents and safety.

### ***Adequacy of the traffic and transport study***

3.1.29 The Traffic and Transport chapter of the Environmental Statement and the supporting Transport Assessment set out the required information at this stage and support the Order in a satisfactory manner. Refinement will be required in the forthcoming Construction Traffic Management Plans for each construction stage.

## **3.2 Impact on roads**

3.2.1 The impact on roads as a result of the Order Scheme will be primarily due to diversion routes provided to mitigate the impacts of road and PRow closures.

3.2.2 The impact considers the 22 construction compound sites, with non-car use encouraged for all staff movements, as set out in Network Rail's Statement of Case in paragraph 9.3.48 (NR28).

3.2.3 As summarised in Network Rail's Statement of Case in paragraph 9.3.52 (NR28) some detail is provided in the ES in the Traffic and Transport section in Volume 2i, Chapter 14 (NR16A) where it is confirmed that of the critical 116 links identified within the study area, 107 links on 68 roads could be impacted by the Scheme during the construction phase:

- Driver delay, pedestrian and cyclist delay, and accidents and safety – temporary significant adverse effects are predicted for 48 links (37 roads);
- Pedestrian and cyclist amenity – temporary significant adverse effects are predicted for 28 links (27 roads);
- Fear and intimidation – temporary significant adverse effects are predicted for 47 links (37 roads); and
- Severance – temporary significant adverse effects are predicted for 67 links (42 roads).

3.2.4 The same document lists in some detail in Table 14-24 these traffic impacts and impacts of lesser or no significance.

3.2.5 Traffic flow changes on some key links are listed in various tables by route section in the TA in Volume 3 Appendix 14.1 (NR16B) showing the changes at different times of day. It is worth pointing out that some of these changes are increases and in other places there are decreases as traffic removes itself from

roads either to avoid closures or as the cumulative ‘ripple’ effect of traffic transferring to one route and then traffic on that route maybe finding other alternative routes.

### ***Mitigation***

- 3.2.6 As in Network Rail’s Statement of Case in paragraph 9.3.49 (NR28) measures to reduce the impacts of construction are set out in the CoCP. This was submitted as Appendix 2-1 of the ES (Vol 3) (NR16B) which set out measures to reduce the potential transport impacts during construction. Whilst there will be overlap with the CTMPs, the CoCP focuses on reducing to a practicable minimum the potential impacts on people and the natural environment.
- 3.2.7 Mitigation measures have been embedded into the design of the Scheme, mainly comprising diversion routes in place for roads temporarily closed. The need for these has been minimised as far as possible, In particular at the A62 Leeds Road Overbridge an offline solution is proposed to enable continued use of the highway as far as possible. The A62 is identified as a key route between Leeds and Huddersfield and the offline construction will enable traffic flow through the majority of works, with limited road closures only required for tie-in works. These design measures are detailed in the Highways Proof of Evidence of Chris Williams (NR/PoE/CW/11.2) and the Design and Engineering Proof of Evidence of Mr Graham Thomas (NR/PoE/GT/2.2).
- 3.2.8 The construction of a temporary platform at the Hillhouse Compound site is proposed, which will enable services to continue to operate to the east to Leeds whilst works at Huddersfield Station are ongoing, minimising impacts to the rail passengers. Passengers will be required to purchase a ticket at the existing Huddersfield station and will travel by a shuttle bus to the Hillhouse site in order to minimise traffic flows and to prevent uncontrolled access to the compound site. It is assumed that during peak hours up to five buses an hour will make the journey. No direct access to the temporary platform will be available to passengers.
- 3.2.9 To minimise impacts, manage displaced traffic and parking, and manage traffic movements associated with the construction compound site operations, detailed mitigation will be through delivery CTMPs for each construction stage. These will be submitted to be agreed by the local authority pursuant to proposed Condition 6 of the DPP prior to any work commencing.
- 3.2.10 It is usual for a CTMP to include details on:
- construction traffic routes;
  - swept path analysis for large vehicles at key turns on those routes;

- times within which construction traffic will arrive and depart (specifically to avoid peak traffic periods and when schools are opening and closing if they are on the construction routes);
- numbers and sizes of Heavy Goods Vehicles (HGVs), and if any larger abnormal loads are required;
- staff numbers and their associated traffic numbers at different times of the day;
- how staff might be transferred from site to site and the associated numbers of vehicles involved and types of vehicle;
- temporary signage might also be added, warning traffic of any narrow sections on the construction routes;
- signage to assist construction traffic to adhere to the prescribed construction routes;
- diversion route signage;
- location of signage;
- location of any traffic signal equipment, advance signal signage and traffic cones; and
- how the methods by which controls are to be enacted, in terms of notifications to staff and other drivers about routes and times.

3.2.11 As set out in Network Rail's Statement of Case in paragraph 9.3.50 (NR28) for the construction associated with this Scheme, the development of CTMPs will identify more specific information in relation to the construction compounds, including site parking requirements and measures to reduce the impacts of the temporary traffic management arrangements. The measures will comprise:

- Diversion routes to be proposed for the road network during temporary road closures - discussions are ongoing with Kirklees Council's Highways Network team to ensure the most appropriate routes are proposed;
- Diversion routes to be proposed for bus services during temporary closures - discussions are ongoing with the Combined Authority to ensure the most appropriate routes are proposed;
- Planning of works in phases such that neighbouring major links are not carried out simultaneously to ensure suitable alternative routes are available;
- Access to properties and businesses will be maintained as far as reasonably practicable during construction; and
- Detailed arrangement for construction compounds including;
  - Traffic route signage;
  - Signing and security of compound access and egress;
  - Co-ordination of temporary road closures; and

- The need for diversions as well as any route timing or volume restrictions.

3.2.12 In addition, the CTMPs will help reduce the negative impacts of temporary roadworks and restrictions, and will include:

- A Rail Replacement Strategy to help reduce the impact of replacement bus services during temporary rail closures.
- A Travel Plan for Construction Staff – to help reduce the impacts from construction staff and rail staff that will operate out of temporary construction compounds, as well as between the strategic construction compounds and satellite compounds through the promotion of sustainable modes of transport as an alternative to the private car.
- Station Travel Plans.

3.2.13 To confirm, as in Network Rail's Statement of Case in paragraph 9.3.51 (NR28), no mitigation measures are proposed for the operational stage given the very limited impact of the permanent change to the highway network.

3.2.14 Much of the content of the CTMPs will refine the details of the approach taken so far for the Environmental Statement and will include close liaison between Network Rail and the local authority in their development. This liaison will include planning, environment (air quality), PRow and Highways officers of the local authority and will also involve liaison with bus service planners at the Combined Authority.

3.2.15 Through that process, more specific information in relation to the construction compounds, construction routes, staff numbers and working hours, associated trips and parking requirements as well as the construction programme and associated traffic measures will be provided.

### ***Adequacy of Environmental Statement for road impacts***

3.2.16 The ES has used a fully detailed and updated strategic traffic model, initially developed by Kirklees Council. Construction scenarios have been built into that model for the different construction scenarios, including construction traffic, the addition on construction traffic (construction vehicles and staff vehicles), temporary road closures and re-routeings. The model has output the residual impacts of these work and their mitigation, which I consider are acceptable at this stage.



### **3.3 Impact on public rights of way**

- 3.3.1 There will be temporary changes to Public Rights of Way (PRoW) and NCN cycle routes as a result of construction of the Scheme and these are set out in Table 14-10 in Chapter 14 of the ES (Vol 2i) (NR16A). These will be of a relatively short term nature. In most cases, to mitigate these closures, diversion routes have been identified where they are available. There will also be instances where PRoWs are crossed by construction traffic, and these will be managed by temporary crossing point installations which will last for the duration of the construction period.
- 3.3.2 The diversion routes are shown in Figure 2-2 of the ES Vol 4 – Figures (NR16C).

#### ***Summary of PRoW closures***

- 3.3.3 Route Section 1 will see minimal temporary impacts with the temporary closures of a number of footpaths accompanied by proposed diversion routes.
- 3.3.4 Route Section 2 will see temporary impacts with the temporary closures of a number of footpaths, byways and cycles route NCN69, as well as canal towpaths being crossed by construction traffic (but not closed); crossing points are to be installed where necessary. Closures will be mitigated through proposed diversion routes (where appropriate).
- 3.3.5 Route Section 3 will see a small amount of temporary closures to a footpath and two sections of cycle route NCN69. Diversion routes amount to an additional 0.5 miles, including making use of the existing cycle lanes on A62 Leeds Road. Closures will be mitigated through proposed diversion routes (where appropriate).
- 3.3.6 Route Section 4 will see a small amount of temporary closures to a footpath and a towpath and two sections of cycle route NCN69.
- 3.3.7 Route Section 5 will see temporary impacts with the temporary closures of footpaths, bridleways and cycle route NCN69. Some diversion routes are proposed, whilst for other closures diversion routes are not required.
- 3.3.8 Route Section 6 will see temporary closures of footpaths, bridleways, towpaths and one closure of part of cycle route NCN69. Some diversion routes are proposed. In some cases no diversion routes are available.
- 3.3.9 Full details of the pedestrian and cyclist impacts are set out in the Transport Assessment (TA) in Volume 3 Appendix 14.1 (NR16) as impacts on non-motorised users. A summary of those impacts, focusing on the worse-case impacts, is set out in the following paragraphs.

### ***Pedestrian impacts***

- 3.3.10 Route Section 1: Pedestrians will be affected by some diversion routes increasing walking times by up to 15 minutes in one case.
- 3.3.11 Route Section 2: A diversion route along Red Doles Road is likely to increase pedestrian walking times by 30 minutes.
- 3.3.12 Route Section 3: Diversion routes amount to 0.5 miles.
- 3.3.13 Route Section 4: In one case, no suitable diversion route can be provided, and in another, if construction works are required on Calder Valley Greenway (Bridleway) a diversion route can be provided. Pedestrians will be impacted by the lack of a suitable diversionary route, which is likely to mean notable increases in their journey time.
- 3.3.14 Route Section 5: In most cases diversion will have an impact upon pedestrians as temporary works will result in extended journeys where diversions are required.
- 3.3.15 Route Section 6: The temporary closure of Calder Road could potentially increase walking journey distances by 2.5 miles. The temporary closure of Thornhill Road could potentially increase journey distances by 0.9 miles.
- 3.3.16 In some instances, no diversion routes are available in Route Section 6 due to the interlinking nature of the PRow, the affected routes are identified in the ES.

### ***Cyclist impacts***

- 3.3.17 Route Section 1: Cyclists will see some journey times increased by up to 5 minutes.
- 3.3.18 Route Section 2: A diversion route along Red Doles Road is likely to increase cyclist journey times by 10 minutes.
- 3.3.19 Route Section 3: Diversion routes amount to 0.5 miles, including making use of the existing cycle lanes on A62 Leeds Road.
- 3.3.20 Route Section 4 In one case, no suitable diversion route can be provided, and in another, if construction works are required on Calder Valley Greenway (Bridleway) a diversion route can be provided. Cyclists will be impacted by the lack of a suitable diversionary route, which is likely to mean notable increases in their journey time.
- 3.3.21 Route Section 5: In most cases will have an impact upon cyclists as temporary works will result extended journeys where diversions are required.

- 3.3.22 Route Section 6: The temporary closure of Calder Road could potentially increase journey distances by 2.5 miles. The temporary closure of Thornhill Road could potentially increase journey distances by 0.9 miles.

***Adequacy of Environmental Statement for PRow impacts***

- 3.3.23 The ES has adequately predicted the PRow residual impacts, which are acceptable at this stage, particularly given the short-term nature of the more adverse impacts.

**3.4 Impact on bus services**

- 3.4.1 There will be temporary changes to bus routes as a result of construction of the Scheme. Temporary road closures impacting bus services directly are confined to Route Sections 1 and 3 are set out in Table 7.10 and paragraph 9.5.6 of the Transport Assessment (TA) in Volume 3 Appendix 14.1 (NR16B). Indirect effects are where road closures do not directly affect bus routes, but they could be affected by traffic diverting from other roads.
- 3.4.2 In Route Section 1 in Huddersfield, the study has suggested bus services can be diverted to Castlegate, Southgate and Kirkgate when a part of John William Street is temporarily closed and to Hillhouse Lane and the A62 when a part of Northgate is temporarily closed for approximately 1 and 5 months respectively. Temporary lane restrictions with potential traffic signal operation on Westgate and temporary lane restrictions on Henry Street are being planned for approximately 6 months. No closures are planned that would affect the operations of Huddersfield Bus Station.
- 3.4.3 In Route Section 3 in Deighton when part of A62 Leeds Street is closed a diversion route via Deighton Road and Whitacre Street has been recommended, but full closure at this location is only programmed for limited periods (weekends and overnight).

***Adequacy of Environmental Statement for bus service impacts***

- 3.4.4 The ES has adequately predicted the bus residual impacts, which are acceptable at this stage, particularly given the short-term nature of the impacts.

**3.5 Rail replacement bus services**

- 3.5.1 Occasionally it will be necessary to close the railway during construction works. At these times, in the Transport Assessment it is assumed that rail replacement bus services are proposed to follow similar routes and frequencies as planned for other and similar works, with stops at stations as

already established. Some details are provided in the Transport Assessment (TA) in Volume 3 Appendix 14.1 (NR16C) for each Route Section.

***Adequacy of Environmental Statement for bus service impacts***

3.5.2 The ES has adequately predicted the rail replacement bus service impacts, which are acceptable at this stage.

## **4. RESPONSES TO SPECIFIC OBJECTORS**

### **4.1 Objectors**

4.1.1 The main objectors on transport grounds are:

- OBJ 33 – Kirklees Council
- OBJ 40 – West Yorkshire Combined Authority
- OBJ 35 – Canal and River Trust
- OBJ 19-21 – Newlay Concrete
- OBJ 15 – Kinder Properties and OBJ 16 Domino's Pizza
- OBJ 23 – HD1 Developments

### **4.2 OBJ 33 – Kirklees Council**

4.2.1 Issues raised by Kirklees Council are being resolved through the collaborative effort in the workshops between Network Rail and Kirklees Council. These issues include where roads are stopped-up and how construction traffic is to be controlled and managed. These measures have been addressed in the ES, and it is intended that they be secured through the CTMPs under proposed Condition 6 of the DPP. This will be addressed in a Statement of Common Ground which is under discussion between the two parties, as well as a Side Agreement being developed for outstanding matters. The Side Agreement will contain details on:

- Highways Network Management Group (including frequency of meetings);
- Process for temporary stopping-up of streets;
- Process for Traffic Regulation Orders; and
- Construction access/egress points.

### ***Objection***

4.2.2 There is no particular objection on transport grounds, but transport/traffic does form part of the objections on other grounds.

4.2.3 In paragraph 10.3.2 of Kirklees Council Statement of Case, the Council state that:

*“The Council does not objection (sic) in principle to the Scheme or to the principle of modifications to the PRow network, but the Council request a mechanism securing the provision of further information and detail regarding the treatments of existing public rights of way and regarding the proposals where changes are intended.”*

4.2.4 In paragraph 10.3.4 (a) of Kirklees Council's Statement of Case:

*"The Council considers that there is likely to be disruption and increased journey times form (sic) the temporary and permanent realignment of several PRowS and as such has suggested a condition to assess and minimise disruption to users across the length of the Scheme."*

### **NR Response**

4.2.5 In relation to the further information request, further information on PRowS will be dealt with under the Side Agreement currently being agreed with Kirklees Council. Network Rail will work with Kirklees Council in the development of the CTMPs, as traffic matters and as part of the mitigation for objections raised to non-transport related aspects where traffic forms a part. The CTMPs will contain, as stated in Section 4 above, measures to manage construction traffic and displaced traffic. This will also satisfy the matters Kirklees Council raise as set out above in paragraphs 4.2.3 and 5.2.4.

4.2.6 Activities are already underway with Kirklees Council to hold regular traffic management meetings during which the required Temporary Traffic Regulation Orders including temporary closures of PRowS and associated diversion routes will be discussed and the outcome of these discussions will inform the production of the CTMPs.

4.2.7 The Side Agreement currently being developed between Network Rail and Kirklees Council contains protocols for discussion in respect of the establishment of a Highways Network Management Group to discuss and agree temporary highways stopping-ups and alterations, and temporary traffic regulations which, alongside the CTMPs' development, is the mechanism for securing further information and detail on modifications to the PRow network.

4.2.8 Given the short duration of the works, the residual impacts after any mitigation are acceptable.

### **4.3 OBJ 40 – West Yorkshire Combined Authority**

4.3.1 In general, the Combined Authority's objections are focused on bus services and maintaining their operation and operation of Huddersfield Bus Station.

### **Objection**

4.3.2 In paragraph 3.6 of the Statement of Case the Combined Authority states that it:

*"...looks forward to working with Network Rail to obtain suitable assurances that the powers in the Order will not adversely affect the safe and efficient*

*operation of the bus station. Discussions regarding these assurances have commenced with Network Rail.”*

4.3.3 In paragraph 5.11 of their Statement of Case, the Combined Authority outline their position in terms of the disruption bus services as a result of the road closures.

4.3.4 The Combined Authority, in paragraph 7.2 of the Statement of Case have stated that they:

*“...would like Network Rail to continue to work with our officers on a comprehensive management strategy, to mitigate the potential impacts on residents and businesses and for this to be agreed at the earliest opportunity. Station Travel Plans and Construction Traffic Management Plans need to be developed jointly with the Combined Authority due to the impact on the public transport network. We are particularly disappointed that there is generally a lack of information in relation to diversionary bus services. Based on our assessment, we believe that bus customers and impacts on the bus network are not adequately considered in the assessments accompanying the application.”*

4.3.5 In paragraph 8.11 of their Statement of Case, the Combined Authority are concerned that bus customers and impacts on the bus network are not adequately assessed in the Transport Assessment. Also at paragraph 8.12.4 the Combined Authority raised the point of the adequacy of diversion routes for buses (as well as HGVs).

4.3.6 In the Combined Authority’s Statement of Case, paragraph 8.12.6 and 8.12.7, the Combined Authority are concerned that the level of detail for rail replacement bus services has not been adequately addressed, including a comparison of train and bus capacity.

### **NR Response**

4.3.7 A Working Group is to be set up between Alliance, West Yorkshire Combined Authority and Kirklees Council to discuss proposals for street works (including temporary road closures), which will include information on programme and proposals for diversion routes including for bus services.

4.3.8 Details of these diversion routes and agreed signage will be detailed within the CTMPs, and will also be detailed in a Side Agreement between Network Rail and Kirklees Council. A separate Side Agreement will be established between Network Rail and the West Yorkshire Combined Authority which will deal with temporary bus management. In this Side Agreement, a Highways Steering Group is intended to be set up comprising officers of Network Rail, the

Combined Authority and Kirklees Council, to consider, discuss and agree the way forward in terms of temporary bus stops, special services and temporary changes to bus routes and the continued operation of the bus station. For the bus station itself it is proposed to set up an interface group of officers from Network Rail and the Combined Authority's Bus Station Project Team to manage and mitigate any impacts that could arise for the bus station.

- 4.3.9 The disruption to the bus network as a result of closure is being kept to a minimum. Bus diversion routes are set out in the Transport Assessment (TA) in Volume 3 Appendix 14.1 (NR16) referencing routes for general traffic for routes displaced by temporary road closures, specifically for temporary closures of parts of John Williams Street and parts of Northgate in Huddersfield and part of the A62 Leeds Road in Deighton. These routes are being kept as short as possible, mindful of the size of these vehicles.
- 4.3.10 The details of the road closures will be outlined in the Construction Traffic Management Plans and will be discussed with the Combined Authority during their development, with an aim to minimise disruption to bus services, however short-term and temporary those construction activities will be.
- 4.3.11 At present, it is assumed that one Working Group will be set up which the Combined Authority and Kirklees Council will attend to discuss highways matters.
- 4.3.12 Firmer details about the construction programmes and a more precise understanding of the requirement for rail replacement bus services will follow as the construction programme is refined. Discussions will take place with the relevant authorities in the development of a schedule of rail replacement bus services. Details will be included in the CTMPs.
- 4.3.13 The ES (Chapter 14, Vol 2i) considers the potential effects on bus services. Firmer details about the construction programmes and the effects on bus routes will be considered as part of the Construction Traffic Management Plans to be developed by Network Rail in association with Kirklees Council and West Yorkshire Combined Authority, including the suitability of any diversion routes for buses (and HGVs).
- 4.3.14 Property elements of this matter are dealt with in the Proof of Evidence of Mr Nigel Billingsley (NR/PoE/NB/5.2).



#### **4.4 OBJ 33 – Canal and River Trust**

##### ***Objection***

- 4.4.1 On page 19 of Appendix A of their objection, the Canal and River Trust highlight that the CTMP should consider abnormal loads and identify routeing information.

##### ***NR Response***

- 4.4.2 Route options for abnormal loads will be discussed with Kirklees Council as highways authority and details will be included in the relevant CTMPs.

#### **4.5 OBJ 19-21 – Newlay Concrete**

##### ***Objection***

- 4.5.1 Discussions with Newlay Concrete, who are based on Calder Road, have identified concerns regarding;
- Impact on the local traffic network which may have a negative impact on business; and
  - Concern that bridge closures on Calder Road will mean a long distance to the market for construction products.

##### ***NR Response***

- 4.5.2 The ES identifies a diversion route adding approximately 1.8 miles to a trip when the Calder Road bridge is closed. Details will be set out in the CTMP with proposals and timings to be communicated to site operators. A plan of the diversion route is shown in Appendix A as taken from the (TA) in Volume 3 Appendix 14.1 Insert 98 (NR16).

#### **4.6 OBJ 15 – Kinder Properties and OBJ 16 Domino's Pizza**

##### ***Objection***

- 4.6.1 An objection has been received from occupants of the Castlegate Retail Park (Domino's Pizza and Kinder Properties) regarding access to egress from the retail car park during the construction period when the John Williams Street underbridge is closed, during which time Green Street, which runs through the retail park in one direction from St John's Road, is to be temporarily closed, along with, in particular, Fitzwilliam Street which provides the only egress from Green Street.

### **NR Response**

4.6.2 A proposal has been lodged with Kirklees Council to mitigate the impact of any temporary closure of Green Street. The proposal is to allow two-way movements at the junction of St John's Road and Green Street to permit both access to and egress from the Castlegate Retail Park during the temporary works on Fitzwilliam Street and the John Williams Street bridge. This arrangement will be in place during the blockades planned for the works and will ensure that patrons can continue to visit the retail units in this location. Kirklees Council Highways team has agreed this arrangement in principal.

4.6.3 Appendix B shows the temporary access arrangement. The exact programme for works is not yet finalised but it is anticipated that any closure will last approximately one month. Further details on the closure are contained in the Proof of Evidence of Mr Mike Pedley (NR/PoE/MP/3.2).

## **4.7 OBJ 23 –HD1 Developments**

### **Objection**

4.7.1 An objection has been received from HD1 developments which sets out in connection to the temporary closure of the car park on Fitzwilliam Street that:

*“...the loss of this important facility (car park) for the period during which the Order is implemented (around 5 years) is not in the public interest, and no reasonable alternatives appear to have been considered by Network Rail.”*

### **NR Response**

4.7.2 Network Rail consider that any parking displaced from the Fitzwilliam Street car park will be able to utilise other publicly available car parks within the vicinity of the station. This includes car parks at Cambridge Road, Bath Street, the Kingsgate Centre, and alongside Huddersfield Bus Station.

4.7.3 In addition I understand that the Council are of the view that the nearby Cambridge Road car park is underused and can accommodate the parking from Fitzwilliam Street, and that the housing allocation for this site will be timed for development after the Upgrade construction works are complete.

## **4.8 Statement of Matters**

### **Issue Raised**

4.8.1 Item 4 of the Statement of Matters sets out that the consideration should be given to the:

“potential effects of the scheme on cycling and walking and the normal and safe operation of Huddersfield Bus Station on tenants and/or users of the Bus Station during the construction including the impacts on local bus services in the area.”

***NR Response***

4.8.2 Property elements of this matter are dealt with in the Proof of Evidence of Mr Nigel Billingsley (NR/PoE/NB/5.2).

4.8.3 The Construction Traffic Management Plans (to be submitted under Condition 6 of the DPP) will be developed with the Council as the planning and highway authority. However based on best practice NR will have a Working Group to discuss and mitigate disruption to highways and buses with the Council and Combined Authority.

## **5. WITNESS DECLARATION**

### **5.1 Statement of declaration**

5.1.1 I hereby declare as follows:

- (i) This proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion.
- (ii) I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.
- (iii) I understand my duty to the Inquiry to help it with matters within my expertise and I have complied with that duty.