

Objection 1 to Kirklees Council (SL)(No 115) Order 2022.

The reduction to 20mph is welcome but there is an element of Monty Python in keeping a 30mph on parts of the same street. It should be across the whole of the town centre, including the Huddersfield Road, and not just in bits. This is rather typical of Kirklees which tries to do the absolute minimum so as not to alienate anyone but then fails to do its job properly.

The new draft Manual for Streets from the Department for Transport, if it is made policy at the end of the year, would seem to put the kibosh on aspects of the Road Access Plan for Holmfirth. It will put the new Highway Code into law with a hierarchy of needs with pedestrians and cyclists at the top, followed by public transport, then [electric cars] and petrol/diesel at the bottom. It would pave the way for more 20mph limits instead of the distinctly odd mix of 20/30mph planned by Kirklees. The current plan reverses the hierarchy by increasing traffic flow, less priority for pedestrians and no extra provision for bus routes.

Additional comments

Thank you for your response, it is much appreciated. However, I have to take issue with a number of points that you raise. In fact, I would suggest that the whole basis on which the changes are predicated is ill-conceived and will make matters worse for pedestrians and cyclists, who, as I pointed out in my original objection, should as per the Highway Code take precedence over car users in the hierarchy of users.

This is admitted in the 'first objective ... reduce congestion' and the wish to 'improve journey times By a minimum of 12%'. The scientific evidence suggests that this will, in fact, increase carbon levels as a) less congestion is likely to increase the numbers of cars and b) the cars will be consuming more petrol as they will despite the 20mph increase speed. There is no aim here – and by default it is admitted as such – to reduce car usage and the number of cars.

There is also bad science in claiming that "reduced idling will also improve air quality'. Research suggests that this is in fact incorrect. Whilst it is indeed a problem with older cars, modern cars are much more efficient and turning off/on is actually less of a pollution problem than free flowing cars which increase speeds and consume more and emit more carbon. The fact that there will no reduction in the speed limit on the main Huddersfield Road can only lead to an increase. And given that reducing congestion will almost certainly lead to increased usage by cars and probably lorries, the problem on Huddersfield Road will again increase.

It might be argued, as I have hear done Councillor attempt to do, that increased numbers of electric cars would help but that doesn't, in fact, deal with congestion or free flow of cars and the low rate of changeover means that any gains from lower emissions do not cancel those from more car usage, which not only includes carbon but also tyre wear which is doubly polluting.

As you admit there are no extra provisions for cycle usage on the Road. No specific cycle lanes. And increased car usage/flow is likely to make it even more dangerous for cyclists and pedestrians.

No mention is made at all of Buses. Should they not have priority - in particular, in the exit from the bus station.

Whilst I do appreciate that Manual for Streets is not yet law, admitting that you are only abiding by "current standards and guides for our design" is hardly in line with Kirklees commitment to zero carbon or a great advert when compared to other Councils which have welcomed going beyond them. Going for low hanging fruit when we have a self-admitted 'climate crisis' is a pretty terrible indictment. It would be good to know whether this is at the direction of the Councillors or of whom. Aim higher...

As I understand it the Carbon assessment of the Road Plan, which was clearly rushed and not comprehensive and is currently being assessed by an independent panel, is flawed because of some of the factors noted above.

For those reasons I stick my objection to what is an ill-thought out and piecemeal plan.

Objection 2 to Conversion of existing Zebra Crossings to Puffin Crossings on Towngate, Victoria Square and Victoria Street.

1. According to the 110 page London Transport Report, Puffin crossing and behaviour study (2005), "49% of pedestrians crossed without using the signal demand", whilst "vehicles that were stopped by the signals had to wait longer at Puffins than at Pelicans".
2. The conversion of the Zebra to Puffin appears to invert the Highway Code making it less useful and less priority for pedestrians than the Zebra. It doesn't potentially comply with the new draft Manual for Streets from the Department for Transport, if it is made policy at the end of the year, would seem to put the kibosh on aspects of the Road Access Plan for Holmfirth. It will put the new Highway Code into law with a hierarchy of needs with pedestrians and cyclists at the top, followed by public transport, then [electric cars] and petrol/diesel at the bottom.
3. London has stopped installing Puffins as pedestrians disliked the degree of uncertainty of the 'green man' when crossing. Likewise, Birmingham because of concern that pedestrian indicators can be obscured by crowds - a problem on Holmfirth's narrow pavements. Also, they should not be installed within 20 metres of a junction -the Highway Code has specific rights for pedestrians on junction crossing. There is no definitive research on the safety issue between the two types of crossing. Puffins are more expensive to install and maintain.
4. The siting of the Puffin is against best practice in that they should be at least 20 metres from a junction. This is clearly not. Is there adequate footpath width for pedestrians who might gather there, especially as it is near the Church and the pick-up for the Last of the Summer wine trips.
5. The plans to view are inadequate. Not sure if it includes rails for the blind and disabled.

Additional Comments

Thank you for replying to my objection. It is appreciated.

However, my objections remain. Everyone I have informed about the aim to improve journey times by a minimum of 12% is astonished – shocked that you are putting traffic above pedestrians and, clearly, failing to deal in any way with the climate change. In fact, the science suggests that you will be increasing carbon and tire wear particle pollution.

The London Study (and not just this one) has been used by other cities and towns and led to a number of them rejecting the Puffin crossings (Birmingham is, I believe, a prime one).

Again, only observing 'current standards' is a poor advert and fails to appreciate what other councils are doing by going above current standards.

You mention "elderly and disabled". In Germany crossing times have been increased to accommodate the increasing numbers of elderly instead of increasing traffic flow.

If I understand your response correctly then you are not undertaking best practice with the siting of the Puffin crossing i.e. its closeness to the junction., rails etc..

For these reasons I will not be withdrawing my objections.

Given the reasons above and those in my objection to the speed changes I believe that there should be a new independent environmental assessment (by the Kirklees Independent Commission) of carbon levels and rubber particle pollution given the increased traffic flows expected and planned for.

I would like to be informed of what the next stages are with regard to objections.