

Mr J Barker
Planning Policy Team
Kirklees MC
PO Box B93, Civic Centre 3,
Off Market Street,
Huddersfield,
HD1 2JR

3rd Floor
15 St Paul's Street
Leeds LS1 2JG

0113 397 1397
leeds@nlplanning.com

nlplanning.com

Date 13 June 2016
Our ref 50461/JG/JSt/11563407v2
Your ref ME1970; ME1972; ME1972; ME1975; ME2545

Dear James

KIRKLEES LOCAL PLAN MINERALS EXTRACTION SITES

Thank you for your letters of the 25th May 2016 relating to the provision of further information for a number of sites promoted by Johnsons Wellfield and the Myers Group for future allocation for minerals extraction.

We have discussed the scope of reporting now required, and that this letter will become public information. This letter is now presented on this basis.

Minerals Extraction Site ME1975 Moor End Farm

We confirm that the boundary shown on the site plan accords with the site location. Please note that the extent of the site should coincide precisely with the field boundaries which on site are generally defined on site by dry stone walling. The plan attached includes part of the public highway to the north and west which is beyond the boundary of the site. We attach plan GIS/50461/01-12 to illustrate the boundary of the site.

Further information is now sought. We can confirm that with respect to Site ME1975, Johnsons Wellfield will demonstrate that the site issues described below can be satisfactorily addressed and that as a consequence there is a reasonable prospect that planning permission will be granted during the plan period.

Access

Access to the site will be taken from Nopper Road, with associated traffic movements then taking a route via Blackmoorfoot Road to the existing processing facility at Thewlis Lane. There is the potential for an alternative route to be taken which utilises a new connection taken from site which crosses to the existing airfield operation which has an existing access route, off the public highway to the existing processing plant located off Thewlis Lane. Johnsons Wellfield will as part of any planning application for development, undertake a comprehensive transport assessment and will



scope the need for and if justified, commit to agreed off site highways improvement with the Highways Authority as part of the proposals to facilitate the transport of minerals from the site.

Surface Water Drainage

In preparing a planning application for the development of the site, Johnsons Wellfield will thoroughly consider the existing surface water drainage regime at and surrounding the site, by undertaking a surface water drainage and flood risk assessment. The working and restoration scheme will be designed so as to mitigate for potential interference with nearby water courses, including necessary measures to safeguard flow and water quality.

JW will liaise with the lead flood authority, the Council's own drainage engineers and the Environment Agency in designing the proposal scheme.

Air Quality

A planning application for development will be accompanied and informed by an air quality assessment. The National Planning Policy Framework (NPPF) indicates that a dust assessment is required for proposed mineral sites to provide evidence that there will be no "unacceptable adverse impacts" at sensitive receptor locations. The NPPF is supported by the National Planning Practice Guidance (NPPG) which includes a minerals section. The NPPG provides advice on the type and characteristics of receptors which should be included in a dust assessment and recognises that both topographical and meteorological conditions should be considered when undertaking the assessment.

Kirklees Council has declared two AQMA's in their area of jurisdiction. The closest AQMA to the proposed development is "AQMA 2" which has been declared for an exceedance of the 24-hour mean PM10 objective. This AQMA is located along a section of Huddersfield Road, A644, approximately 13km north-west of the proposed allocation for development.

The main potential air quality effects expected to be associated with the proposed development are dust emissions from earthworks and track out in the initial site development phase and dust emissions from mineral extraction, handling and transportation in the operational phase.

Potential air quality effects from the construction phase will be assessed using the IAQM guidance document, "Guidance on the assessment of dust from demolition and construction." (February 2014). Potential air quality effects associated with the operational phase will be assessed using the IAQM guidance document, "Guidance on the Assessment of Mineral Dust Impacts for Planning" (May 2016). The IAQM (2016) guidance document, 'Guidance on the assessment of mineral dust impacts for planning' will be utilised to assess air quality effects associated with the operational phase. This recommends combining the residual source emissions with the pathway effectiveness to determine the dust impact risk depending on the proximity of receptors to dust generating activities, meteorological and topographical conditions.

The assessment of air quality effects will be used to define appropriate mitigation measures to reduce the level of effects such that they are not significant. JW will liaise closely with the Council's Environmental Health department in agreeing assessment methodology and the form of any mitigation measures necessary.



Heritage

The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. This site lies some 350 metres from the edge of the South Crosland Conservation Area.

Johnsons Wellfield will commission heritage consultants to undertake a desk based Historic Environment Assessment which will form the baseline assessment. This will assess the above and below ground designated and undesignated assets including the South Crosland Conservation Area. The assessment will be informed by agreed viewpoints and zone of visual impact visualisations which will be produced as appropriate.

That assessment, together with other technical assessments will be used to design an acceptable scheme which pays particular attention to the heritage assets including the South Crosland Conservation Area.

Minerals Extraction Site ME2545 Moor End South

We attach a revised boundary to show the proposed allocation site boundary. This correlates with the boundary (plan reference GIS/50461/01-19) shown on the NLP submission of 23rd November 2015. This site edged blue is owned by Johnsons Wellfield.

Further information is now sought. We can confirm that with respect to Site ME2545 Johnsons Wellfield will demonstrate that the site issues described below can be satisfactorily addressed and that as a consequence there is a reasonable prospect that planning permission will be granted during the plan period.

Access

Access to the site will be taken from a position close to the existing agricultural access within the north west of the prospect on Arborary Lane. This will be designed to a standard appropriate for the level of usage intended. Traffic to and from the site will be from the north via Nopper Road, with associated traffic movements then taking a route via Blackmoorfoot Road to the existing processing facility at Thewlis Lane. Johnsons Wellfield will as part of any planning application for development, undertake a comprehensive transport assessment and will scope the need for and if justified, commit to agreed off site highways improvement with the Highways Authority as part of the proposals to facilitate the transport of minerals from the site.

Surface Water Drainage

In preparing a planning application for the development of the site, Johnsons Wellfield will thoroughly consider the existing surface water drainage regime at and surrounding the site, by undertaking a surface water drainage and flood risk assessment. The working and restoration scheme will be designed so as to mitigate for potential interference with nearby water courses, including necessary measures to safeguard flow and water quality.

JW will liaise with the lead flood authority, the Council’s own Drainage engineers and the Environment Agency in designing the proposal scheme.



Air Quality

A planning application for development will be accompanied and informed by an air quality assessment. The National Planning Policy Framework (NPPF) indicates that a dust assessment is required for proposed mineral sites to provide evidence that there will be no “unacceptable adverse impacts” at sensitive receptor locations. The NPPF is supported by the National Planning Practise Guidance (NPPG) which includes a minerals section. The NPPG provides advice on the type and characteristics of receptors which should be included in a dust assessment and recognises that both topographical and meteorological conditions should be considered when undertaking the assessment.

Kirklees Council has declared two AQMA’s in their area of jurisdiction. The closest AQMA to the proposed development is “AQMA 2” which has been declared for an exceedance of the 24-hour mean PM10 objective. This AQMA is located along a section of Huddersfield Road, A644, approximately 13km north-west of the proposed allocation for development.

The main potential air quality effects expected to be associated with the proposed development are dust emissions from earthworks and track out in the initial site development phase and dust emissions from mineral extraction, handling and transportation in the operational phase.

Potential air quality effects from the construction phase will be assessed using the IAQM guidance document, “Guidance on the assessment of dust from demolition and construction.” (February 2014). Potential air quality effects associated with the operational phase will be assessed using the IAQM guidance document, “Guidance on the Assessment of Mineral Dust Impacts for Planning” (May 2016). The IAQM (2016) guidance document, ‘Guidance on the assessment of mineral dust impacts for planning’ will be utilised to assess air quality effects associated with the operational phase. This recommends combining the residual source emissions with the pathway effectiveness to determine the dust impact risk depending on the proximity of receptors to dust generating activities, meteorological and topographical conditions.

The assessment of air quality effects will be used to define appropriate mitigation measures to reduce the level of effects such that they are not significant. JW will liaise closely with the Council’s Environmental Health department in agreeing assessment methodology and the form of any mitigation measures necessary.

Heritage

The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. This site at its closest lies some 100 metres from the edge of the South Crosland Conservation Area.

Johnsons Wellfield will commission heritage consultants to undertake a desk based Historic Environment Assessment which will form the baseline assessment. This will assess and the above and below ground designated and undesignated assets including the South Crosland Conservation Area. The assessment will be informed by agreed viewpoints and zone of visual impact visualisations which will be produced as appropriate.



That assessment, together with other technical assessments will be used to design an acceptable scheme which pays particular attention to the heritage assets including the South Crosland Conservation Area.

Minerals Extraction Site ME1970 Seventy Acres, Honley

We confirm that the boundary shown on the site plan accords with the site location. Please note that the extent of the site should coincide precisely with the field boundaries which on site are defined by dry stone walling. The plan attached includes part of the public highway to the north and west which is beyond the boundary of the site. We attach plan GIS/50461/01-09 to illustrate the boundary of the site.

Further information is now sought. We can confirm that with respect to Site ME1970 Johnsons Wellfield will demonstrate that the site issues described below can be satisfactorily addressed and that as a consequence there is a reasonable prospect that planning permission will be granted during the plan period.

Surface Water Drainage

In preparing a planning application for the development of the site, Johnsons Wellfield will thoroughly consider the existing surface water drainage regime at and surrounding the site, by undertaking a surface water drainage and flood risk assessment. The working and restoration scheme will be designed so as to mitigate for potential interference with nearby water courses, including necessary measures to safeguard flow and water quality.

JW will liaise with the lead flood authority, the Council's own Drainage engineers and the Environment Agency in designing the proposal scheme.

Local Air Quality

A planning application for development will be accompanied and informed by an air quality assessment. The National Planning Policy Framework (NPPF) indicates that a dust assessment is required for proposed mineral sites to provide evidence that there will be no "unacceptable adverse impacts" at sensitive receptor locations. The NPPF is supported by the National Planning Practise Guidance (NPPG) which includes a minerals section. The NPPG provides advice on the type and characteristics of receptors which should be included in a dust assessment and recognises that both topographical and meteorological conditions should be considered when undertaking the assessment.

The IAQM (2016) guidance document, 'Guidance on the assessment of mineral dust impacts for planning' will be utilised to assess air quality effects associated with the operational phase. This recommends combining the residual source emissions with the pathway effectiveness to determine the dust impact risk depending on the proximity of receptors to dust generating activities, meteorological and topographical conditions.

Kirklees Council has declared two AQMA's in their area of jurisdiction. The closest AQMA to the proposed development is "AQMA 2" which has been declared for an exceedance of the 24-hour mean PM10 objective. This AQMA is located along a section of Huddersfield Road, A644, approximately 13km north-west of the proposed allocation for development.



The main potential air quality effects expected to be associated with the proposed development are dust emissions from earthworks and track out in the initial site development phase and dust emissions from mineral extraction, handling and transportation in the operational phase.

Potential air quality effects from the construction phase will be assessed using the IAQM guidance document, "Guidance on the assessment of dust from demolition and construction." (February 2014). Potential air quality effects associated with the operational phase will be assessed using the IAQM guidance document, "Guidance on the Assessment of Mineral Dust Impacts for Planning" (May 2016).

The assessment of air quality effects will be used to define appropriate mitigation measures to reduce the level of effects such that they are not significant. JW will liaise closely with the Councils Environmental Health department in agreeing assessment methodology and the form of any mitigation measures necessary.

Heritage

This site lies close to a number of archaeological sites (reference 10376/2; 12168/2; and 10375/2) the nearest of which is some 70 metres from the proposed allocation and two scheduled monuments (reference SM31505; SM31506), the nearest of which is approximately 50 metres from the boundary of the proposed allocation.

Johnsons Wellfield will commission heritage consultants to undertake a desk based Historic Environment Assessment which will form the baseline assessment. This will assess the above and below ground designated and undesignated assets including the archaeological sites and scheduled monuments highlighted above. The assessment will be informed by agreed viewpoints and zone of visual impact visualisations which will be produced as appropriate.

That assessment, together with other technical assessments will be used to design an acceptable scheme which pays particular attention to the heritage assets protecting those assets from harm.

Nature Conservation

Development can affect ancient woodland and veteran trees, and the wildlife they support. In this case the ancient woodland abuts the northern boundary of the ME1970 minerals prospect. As part of any planning application for development Johnsons Wellfield will undertake both an ecological assessment (comprising phase 1 habitat survey and stage 2 species specific surveys as required) together with a tree survey to determine the baseline so far as this relates to the ancient woodland located to the north of the minerals prospect site. The methodology for the assessments will be agreed beforehand with the Council and statutory consultees.

That assessment, together with other technical assessments will be used to design an acceptable scheme which pays particular attention to the safeguarding of the ancient woodland and nature conservation species which it supports from harm, be this in terms of ground water, air quality or in combination with other technical considerations.



Minerals Extraction Site ME1971 Seventy Acres, Honley

We confirm that the boundary shown on the site plan accords with the site location. Please note that the extent of the site should coincide precisely with the field boundaries which on site are defined by dry stone walling. The plan attached includes part of the public highway to the north and west which is beyond the boundary of the site. We attach plan GIS/50461/01-10 to illustrate the boundary of the site.

Further information is now sought. We can confirm that with respect to Site ME1971 Johnsons Wellfield will demonstrate that the site issues described below can be satisfactorily addressed and that as a consequence there is a reasonable prospect that planning permission will be granted during the plan period.

Surface Water Drainage

In preparing a planning application for the development of the site, Johnsons Wellfield will thoroughly consider the existing surface water drainage regime at and surrounding the site, by undertaking a surface water drainage and flood risk assessment. The working and restoration scheme will be designed so as to mitigate for potential interference with nearby water courses, including necessary measures to safeguard flow and water quality.

JW will liaise with the lead flood authority, the Council's own Drainage engineers and the Environment Agency in designing the proposal scheme.

Local Air Quality

A planning application for development will be accompanied and informed by an air quality assessment. The National Planning Policy Framework (NPPF) indicates that a dust assessment is required for proposed mineral sites to provide evidence that there will be no "unacceptable adverse impacts" at sensitive receptor locations. The NPPF is supported by the National Planning Practise Guidance (NPPG) which includes a minerals section. The NPPG provides advice on the type and characteristics of receptors which should be included in a dust assessment and recognises that both topographical and meteorological conditions should be considered when undertaking the assessment.

Kirklees Council has declared two AQMA's in their area of jurisdiction. The closest AQMA to the proposed development is "AQMA 2" which has been declared for an exceedance of the 24-hour mean PM10 objective. This AQMA is located along a section of Huddersfield Road, A644, approximately 13km north-west of the proposed allocation for development.

The main potential air quality effects expected to be associated with the proposed development are dust emissions from earthworks and track out in the initial site development phase and dust emissions from mineral extraction, handling and transportation in the operational phase.

Potential air quality effects from the construction phase will be assessed using the IAQM guidance document, "Guidance on the assessment of dust from demolition and construction." (February 2014). Potential air quality effects associated with the operational phase will be assessed using the IAQM guidance document, "Guidance on the Assessment of Mineral Dust Impacts for Planning" (May 2016). The IAQM (2016) guidance document, 'Guidance on the assessment of mineral dust impacts for planning' will be utilised to assess air quality effects associated with the operational phase. This recommends combining the residual source emissions with the pathway effectiveness



to determine the dust impact risk depending on the proximity of receptors to dust generating activities, meteorological and topographical conditions.

The assessment of air quality effects will be used to define appropriate mitigation measures to reduce the level of effects such that they are not significant. JW will liaise closely with the Councils Environmental Health department in agreeing assessment methodology and the form of any mitigation measures necessary.

Heritage

This site lies close to a number of archaeological sites (reference 10376/2; 12168/2; and 10375/2) and two scheduled monuments (reference SM31505; SM31506).

Johnsons Wellfield will commission heritage consultants to undertake a desk based Historic Environment Assessment which will form the baseline assessment. This will assess and the above and below ground designated and undesignated assets including the archaeological sites and scheduled monuments highlighted above. The assessment will be informed by agreed viewpoints and zone of visual impact visualisations which will be produced as appropriate.

That assessment, together with other technical assessments will be used to design an acceptable scheme which pays particular attention to the heritage assets protecting those assets from harm.

Minerals Extraction Site ME1972 Seventy Acres, Honley

We confirm that the boundary shown on the site plan accords with the site location. Please note that the extent of the site should coincide precisely with the field boundaries which on site are defined by dry stone walling. The plan attached includes part of the public highway to the north and west which is beyond the boundary of the site. We attach plan GIS/50461/01-11 to illustrate the boundary of the site.

Further information is now sought. We can confirm that with respect to Site ME1972 Johnsons Wellfield will demonstrate that the site issues described below can be satisfactorily addressed and that as a consequence there is a reasonable prospect that planning permission will be granted during the plan period.

Surface Water Drainage

In preparing a planning application for the development of the site, Johnsons Wellfield will thoroughly consider the existing surface water drainage regime at and surrounding the site, by undertaking a surface water drainage and flood risk assessment. The working and restoration scheme will be designed so as to mitigate for potential interference with nearby water courses, including necessary measures to safeguard flow and water quality.

Johnsons Wellfield will liaise with the lead flood authority, the Council's own Drainage engineers and the Environment Agency in designing the proposal scheme.

Local Air Quality

A planning application for development will be accompanied and informed by an air quality assessment. The National Planning Policy Framework (NPPF) indicates that a dust assessment is required for proposed mineral sites to provide evidence that there will be no "unacceptable adverse impacts" at sensitive receptor locations. The NPPF is supported by the National Planning Practise Guidance (NPPG) which includes a minerals section. The NPPG provides advice on the type and



characteristics of receptors which should be included in a dust assessment and recognises that both topographical and meteorological conditions should be considered when undertaking the assessment.

Kirklees Council has declared two AQMA's in their area of jurisdiction. The closest AQMA to the proposed development is "AQMA 2" which has been declared for an exceedance of the 24-hour mean PM10 objective. This AQMA is located along a section of Huddersfield Road, A644, approximately 13km north-west of the proposed allocation for development.

The main potential air quality effects expected to be associated with the proposed development are dust emissions from earthworks and track out in the initial site development phase and dust emissions from mineral extraction, handling and transportation in the operational phase.

Potential air quality effects from the construction phase will be assessed using the IAQM guidance document, "Guidance on the assessment of dust from demolition and construction." (February 2014). Potential air quality effects associated with the operational phase will be assessed using the IAQM guidance document, "Guidance on the Assessment of Mineral Dust Impacts for Planning" (May 2016). The IAQM (2016) guidance document, 'Guidance on the assessment of mineral dust impacts for planning' will be utilised to assess air quality effects associated with the operational phase. This recommends combining the residual source emissions with the pathway effectiveness to determine the dust impact risk depending on the proximity of receptors to dust generating activities, meteorological and topographical conditions.

The assessment of air quality effects will be used to define appropriate mitigation measures to reduce the level of effects such that they are not significant. Johnsons Wellfield will liaise closely with the Council's Environmental Health department in agreeing assessment methodology and the form of any mitigation measures necessary.

Heritage

This site lies close to a number of archaeological sites (reference 10376/2; 12168/2; and 10375/2) and two scheduled monuments (reference SM31505; SM31506).

Johnsons Wellfield will commission heritage consultants to undertake a desk based Historic Environment Assessment which will form the baseline assessment. This will assess and the above and below ground designated and undesignated assets including the archaeological sites and scheduled monuments highlighted above. The assessment will be informed by agreed viewpoints and zone of visual impact visualisations which will be produced as appropriate.

That assessment, together with other technical assessments will be used to design an acceptable scheme which pays particular attention to the heritage assets protecting those assets from harm.



Nathaniel Lichfield
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Conclusion

The statement set out above responds to the questions raised by Kirklees Council in respect to sites ME 1970; ME1971; ME1972; ME1975 and ME2545. Should you require any further clarification, please do not hesitate to contact me.

Yours sincerely



Jonathan Standen
Planning Director