

Mr Glenn Wakefield  
Kirklees Metropolitan Borough Council  
Planning Services  
PO Box B93  
Huddersfield  
West Yorkshire  
HD1 2JR

**Our ref:** RA/2013/125836/01-L01  
**Your ref:** 2013/62/90793/W  
**Date:** 12 August 2013

Dear Mr Wakefield

**MINERAL EXTRACTION  
LAND ADJACENT THEWLIS LANE, CROSLAND MOOR, HUDDERSFIELD, HD4 7AB**

Thank you for consulting us on the above application and allowing us more time to provide our comments.

We have no objections to the application as submitted, providing the below condition is included in the grant of any planning permission:

**Flood Risk**

The proposed development will only meet the requirements of the National Planning Policy Framework if the following measure(s) as detailed in the Flood Risk Assessment submitted with this application are implemented and secured by way of a planning condition on any planning permission.

**Condition**

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) by S M Foster Associates Ltd, dated June 2012, Ref 033/027/01/fra and the following mitigation measures detailed within the FRA:

- Managing the surface water runoff such that surface water will be attenuated within the site.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing/phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

**Reason**

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

We also have the following advice to offer:

**Environmental Permit****Advice to LPA/applicant**

This development may require an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency, unless a waste exemption applies.

If any controlled waste is to be removed off site, then the site operator must ensure a registered waste carrier is used to convey the waste material off site to a suitably permitted facility.

The applicant is advised to contact the Environment Management team at our Leeds Office on 03708 506 506 or refer to guidance on our website <http://www.environment-agency.gov.uk/subjects/waste>

**Groundwater**

We have reviewed the 2013 conceptual model produced by S Foster and visited the Thewlis Quarry site on 22 July 2013. We had initial concerns with the evidence to suggest that there will be very little water in the proposed quarry, bar minor seepages. Our concerns have now been dealt with.

We are now clear that the siltstone band below the quarry is low in permeability and there is some form of water table above this, although it may be intermittent or thin. Our understanding from the site visit is the method of quarry working is to leave a layer of sandstone above the siltstone. This is needed to allow quarry machinery to track across the quarry floor, without the ground being churned into wet mud or silt. If they did encounter wet ground they would backfill with the abundant quarry spoil that they have available after a relatively short period. Therefore, at any time only a small proportion of the quarry will extend down below the water table.

The quarry operator will not abstract groundwater from the quarry. Therefore, groundwater will broadly continue to migrate down the geological dip to spring discharges.

We consider that there is little prospect of unacceptable impacts from the quarry. Firstly any disturbance of the water table will be minor during the quarry. And such disturbance will be short term because the quarry will only be active for 8 years. Then the quarry will be backfilled with quarry spoil that is likely to be high in permeability.

**Water Resources**

The Environmental Statement focuses on Groundwater rather than potential impacts on Surface Waters, as there are no watercourses in close proximity to the site. However, we are concerned that there is no reference anywhere in the document to the Water Framework Directive or the Humber River Basin Management Plan. We recommend

that the applicant should consider the aims and objectives of this key piece of EU legislation, to ensure that the proposals do not lead to deterioration of the water environment (groundwater or surface water).

### **Historic Landfill**

On the 22nd of June 2007 we sent your Authority a CD containing historic landfill data which has all the information we hold on the historic landfill sites within 250m of this development proposal. As such, we have no further comments on this application.

If you have any queries or require any additional information, please do not hesitate to contact me on the details below.

Yours sincerely

**Abdul Gaffar**  
**Sustainable Places - Planning Advisor**

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