

From:
Sent: 15 August 2023 14:36
To: DCAdmin
Subject: Comment on Application number 2023/62/91280/E0 (over word limit)

As a resident of Upper Cumberworth, I am writing to express my serious concerns about the application submitted to restart mineral extraction at Bromley Farm Quarry after nearly a decade. This application contains significant inconsistencies and misleading statements that may have deceived some of those who were consulted as part of the statutory requirement. These concerns revolve around traffic issues, the impact on the environment and noise, and the overall environmental implications. Even though the area is designated for possible mineral extraction in Kirklees, the application fails to adequately justify why this location should be chosen or what safeguards will be implemented for the community.

1) The traffic estimates provided in the application are perplexing due to their varied and confusing nature. For instance, there is mention of 60-120 HGV movements per day, which seems to be based on a 48-week working year. However, it is evident that campaigns will focus on certain times of the year, potentially intensifying this estimate. The basis for this calculation is unclear and other points in the application say it might vary based on market demand. This lack of clarity raises doubts about the accuracy of the figures and whether the applicant is certain about the numbers. It would be hoped in any accepted application the planning authority would set out a constant for a specific number per day as a maximum cap, as for the infill works previously (although the present application is flawed on many other grounds and should be approved).

Assuming the provided estimate is accurate, my main concern revolves around the increased HGV movements on the already busy Upper Cumberworth A635 road, particularly during school pick-up and drop-off times. This poses a risk to pedestrians, cyclists, and children commuting to school. Additionally, the application portrays the proposed traffic as an extension of existing activity, which does not accurately represent the situation since mineral extraction ceased in 2014. Statements such as "minor additional use of the quarry" fail to acknowledge the substantial effect of restarting activities from a current baseline of zero. These misleading statements may have influenced the responses of non-local statutory bodies, such as Active England who failed to provide any substantive input, in their consultation.

Clarity on the number of vehicle movements is crucial, and planners must thoroughly comprehend and assess the resulting impact. Additionally, a misleading statement was made regarding the absence of

incidents on Crashmap over the past 5 years—referring to the site entrance, although its usage has been reduced. However, considering the route these vehicles must follow along the A635 to the Sovereign Junction or through Carr Hill Road (which may be restricted in one direction, subject to enforcement), and then proceeding towards or above Birdsedge, even when restricted to accidents in the past 5 years involving goods vehicles, the following incidents have occurred within a short walk from our home:

- Upper Cumberworth: 1 serious, 1 slight
- Around the Sovereign and Carr Lane (adjacent to PMW quarries): 2 serious
- Towards Birdsedge from Upper Cumberworth A629: 1 serious, 1 slight

Furthermore, Upper Cumberworth stands as one of the few settlements without speed safety cameras or lower speed restrictions on the A635/636 stretch—from the Sovereign/A629 junction to the A637 near Midgley. Traffic from the A635 and 636 converges at the Denby Dale junction, passing through Upper Cumberworth. The absence of such measures, which are found in other settlements along the same road, suggests that addressing traffic concerns on the A635 is already imperative. Any proposed development should have collaborated with Kirklees and relevant stakeholders to devise substantial solutions to this issue prior to submitting the application, especially if the proposal could exacerbate this situation.

2) While acknowledging that planning applications can be received throughout the year, it is astonishing that, especially considering the significant scale of this application in terms of its footprint, the Local Planning Authority fulfilled their obligations (according to the Town and Country Planning (Development Management Procedure) (England) Order 2010 and the Planning (Listed Buildings and Conservation Areas) Act 1990) by placing a site notice at a single location well into the public consultation period in holiday season (specifically, on the 26th of July, or 70% of the way through the consultation period). It's worth noting that this sign is positioned far from the A635, despite the significant impact this project could have on it. Despite the limited time available for expressing concerns, a considerable number of issues have been raised by local residents, highlighting the widespread nature of the problems. Many residents have faced similar issues in the past pre 2014 when there was activity before, such as noise and dust, and they justifiably seek greater reassurances that align with current standards rather than historical ones.

These concerns mirror the original objections presented in the parish response, which explicitly highlighted concerns regarding “proximity to the school, increased traffic onto a narrow highway, and considerable disturbance and environmental impact.”. It is disheartening to note that these concerns don't appear to have been adequately addressed in the current version of the application.

3) In addition to the misleading impression that this application represents a continuation of current operations, notable inconsistencies and errors significantly hinder accurate assessments. Although this list is not exhaustive, several examples are particularly concerning:

— Miller Goodall, representing Silkstone Environmental Ltd., the latter being responsible for many of the submitted assessments (including Coal Mining, Hydrological Impact, Flood Risk, Landscape and Visual Impact, Noise, and Preliminary Geo-environmental Risk), has produced an Air Quality and Dust Assessment with repeated references (45 times) to the location as "Gantham," even in the title. This oversight, whether due to a lack of local knowledge or a copying error, suggests a lack of attention to detail in their work. This lapse in accuracy could extend to other parts of their documentation, raising doubts about its reliability. It's concerning that neither the primary contractor (Silkstone) nor the quality control process identified this error and what else may have been missed similarly. It is also difficult to conceive how both parties could be familiar enough with the site to undertake such detailed assessments but not be able to pinpoint it to the nearest 100 km.

— The Access Road plans provided by Paragon Highways (ID 987937) depict a single lane off Barnsley Road (A635), which contradicts the claim of two lanes elsewhere. Although the new access road is shown with two lanes, HGVs from the quarry only use the road towards the tip (which is a deadend) as they exit from it. While this could be an inadvertent error, it remains significantly misleading and makes the situation look much better than the reality of HGVs needing to pass on the already busy recycling centre approach. If the company, which should have an intimate understanding of traffic and vehicle requirements, cannot accurately present this detail (unless intentionally misleading), it raises concerns about their competence in

other areas as well. The tendency or decision not to show it drawn correctly also highlights the inadequacy of the existing access road, which is narrow and busy (the drawing wouldn't fit!), especially considering the high volume of traffic that would be generated by the proposed operations.

— There are inconsistencies in the presented operating times. The application form indicates 0700-1800 Mon-Fri and 0730-1300 Sat, while Supporting Statement 3.11 specifies 0730 Mon-Fri and 0700-1300 Sat.

— Discrepancies exist between the application form and the supporting statement regarding the waste management system. While the application form states "no foul water," the supporting statement (3.10) describes the use of a septic tank.

— References to the location exhibit inconsistent measurements and descriptions, often referring to the relation to the village rather than the site itself. For instance, 7.2.2 mentions the nearest residential areas as Upper Cumberworth, situated just 100m to the east of the village's edge. However, 7.5.20 refers to Upper Cumberworth as 400m to the east of the village's edge.

— The ecological report displays minor typos and a lack of attention to detail.

Some additional minor concerns are outlined below. Addressing these issues alone, without considering the traffic concerns, the misleading and inaccurate nature of the application, and the strength of local sentiment, would not be sufficient to change the overall view.

1) Specifics about job generation remain unclear. While reference is made to 95 jobs associated with the site at Crow's Edge/this application, mentions of extractions from another quarry and their wider business are also present. The distinction between jobs directly and peripherally impacted is unclear. These jobs are also not in the impacted area. Given that job creation is a pivotal claim in support of this proposal, the lack of detail undermines the case for its approval.

2) Notably, there is a mention of extracting not insignificant incidental coal. However, the extent of its impact on the business model and site decision remains unclear due to insufficient detail. This lack of clarity is especially important as new coal extraction likely conflicts with national net-zero targets, and those set by the Kirklees Local Authority. Determining whether such extraction is necessary for the viability of the proposal and how it will avoid substantially increasing CO2 emissions is essential. The potential adverse consequences and substantial quantities could undermine various small initiatives. For instance, 10,000 tons of coal burned equates to 36,000 tons of CO2 emissions, equivalent in one hit to 10% of Kirklees' targeted per annum reduction by 2050 as part of the "Net Zero for Kirklees." This seems out of all proportion to any jobs preserved or created. Additionally, methane emissions (a 28 times more potent greenhouse gas) from the site could exacerbate the issue further. Considering this, Kirklees should be looking to support land uses and job opportunities that align with, rather than counteract, net-zero targets.

3) The Supporting Statement (12.8.5) refers to the use of an existing road leading to the recycling centre. It mentions that this road can accommodate two vehicles, one being a car and the other an HGV. However, the road already struggles with traffic volume to the recycling centre, often involving trailers. Moreover, in some places, it's difficult for even two normal cars to pass, let alone a car and an HGV. The road's poor condition, with potholes and uneven surfaces, raises questions about the accuracy of details presented, such as a claim (7.2.16) that it's constructed to a high standard. It's doubtful whether the road can accommodate HGVs while ensuring access to the recycling centre. This concern is amplified during Saturday morning operations when vehicles waiting to enter the recycling centre from the A635 often block the A635 waiting to turn. HGVs leaving the centre will also need to navigate corners and uphill sections, potentially causing traffic slowdowns and dangerous manoeuvres.

4) The application mentions no diversion of existing footpaths, including the Denby & Cumberworth Circular trail (DEN/84/10), which is described as heavily used. Although no diversion is proposed, crossing at the recycling centre access road can already be challenging at times. Now, pedestrians will need to cross

at the junction with the quarry access road, potentially hindered by screening earth mounds, especially when approaching from the northwest. While it might not be part of the proposal to divert, ensuring a safe crossing point may become necessary, possibly involving aids such as widening or islands. Curiously, no party seems to have considered or assessed this aspect.

5) The ecological report lacks figures and justification for habitat evaluations. Particularly concerning are extended wildlife corridors serving the Dearne Valley woodland, housing many uncommon species. These woods are situated close to the quarry site, even closer to the turning point for HGVs and the busy access road, which will intersect these wildlife passages. The report mentions Biodiversity Net Gain calculations implying a 64.49% net gain (7.5.6). However, no supporting evidence for this unusually high value is provided. A separate Biodiversity Net Gain report, detailing assumptions underlying calculations, including habitat classification and condition assessment, should be made available for scrutiny. Given other inconsistencies and errors, ensuring transparency and allowing scrutiny is critical. The realization timescales and the fate of biodiversity over the next 25+ years, crucial for the survival of declining species, must also be considered – the assessment as given looks only before/after which might be suitable for short term work often considered by planners, but not a 25 year operation.

6) One potential route for HGVs involves Carr Hill Road. Although attempts have been made (although regularly broken and not enforced) to introduce a restriction (signed in one direction) for vehicles above 3.5 tonnes, this cut-through remains busy and lacks pavement. If HGVs were routed this way, it would likely compel pedestrians to opt for cars for safety reasons, both for themselves and their children. Furthermore, this situation underscores that traffic is indeed a road safety concern in the village. If Carr Hill Road is not utilized, HGVs will need to navigate a challenging turn at the busy and awkward Sovereign junction. Moreover, they will be passing through the village's middle section at full speed, a situation that could significantly worsen an already problematic traffic scenario, considering the expected 120 HGVs per day.

7) Another intriguing and valid point raised by others pertains to the comparison between wind farms and this quarry application. Wind farms often offer compensation for relatively minor disruptions compared to the substantial disturbances this quarry application could cause to Upper Cumberworth (and Lower Cumberworth). My firm belief is that the current form of the application should not be accepted. However, if it were to be considered, or upon resubmission, supporting the scheme could be achieved through proactive engagement with the local community, rather than alienating them through insufficient information and notice.