

About the application

Application number: 2023/91280	
What is the application for?:	Quarrying operations for the extraction of clay, shale and incidental coal and s
Address of the site or building:	Bromley Farm Quarry, Barnsley Road, Upper Cumberworth, Huddersfield, HD8 8PD
Postcode:	S36 4HG

User comments

Type of comment: An objection	
Do you wish your comments to be published on the website anonymously?	Yes
From the supporting document I have noted to some concerning discrepancies that make opposed to this planned development. “1.0 INTRODUCTION 1.0.7 The extraction of clay is not a continuous operation and is usually removed between April and September on a campaign basis to provide sufficient material to maintain the stockpiles for the year ahead Noise Prediction Assumptions 8.9.5 Rates of clay extraction are estimated to be a maximum of 30,000 tonnes per annum (tpa) but is dependent upon market demand. 8.9.6 For 30,000 tpa, over a 48 week working year, this equates to a maximum of 60 HGV movements per day. 12 movements per hour as a maximum (6in, 6out) have been included in the noise modelling calculations. 8.9.7 The 60 movements includes the importation of inert waste for restoration when a sufficient void has been created for this to be undertaken. This is expected to be approximately during the working of Cut 3. 8.9.8 The previous quarry had a restriction of 20 HGV imports per day and this is anticipated to be sufficient in any new permission.” In the introduction to this application there is an implication that this site will only run for a short “campaign” season (~26weeks) . As we can see here for the noise predictions they have used a model that is 48 week (~85% higher). This model to say noise levels will not be higher than legislative safe levels appears to be using a work intensity that does not reflect the implied levels in section 1.0.7 (or they have chosen to be deliberately misleading and intend a much longer “campaign” season at the quarry). If you take the figures proposed for movements per hour and factor in this increased intensity then it looks to be closer to 22 rather than 12 used for the calculations. In the traffic impact assessment they also appear to be using the same model as the noise impact assessment (please see quoted extract 12.8.3 bellow). I am forced to assume that they are also using as 48 week working model (I am unable to find a description for the model they used in either document 992471 or 988974) when making their analysis. • 12.8.3 It is anticipated that there will be a maximum of 120 hgv movements per day associated with the proposed quarry with 60 in and 60 out. This equates generally to a	

associated with the proposed quarry with 60 in and 60 out. This equates generally to a hgv movement along the access road leading from the A635 every 6 minutes or thereabouts.

- 12.9.2 Therefore, the level of traffic generated by the proposals can easily be accommodated and will have no material impact on the safe operation of the local highway and will not significantly add to any congestion at the peak times on the local network

Should the applicant stick to their claimed 26 week "campaign" working model I need to ask if the above statement in 12.9.2 would still be true for the 220 HGV movements per day that would be required to fit 48 weeks work in to just 26. The traffic assessment also focuses very heavily on the A635. There does not appear to be however any comment on the wider local area. I would consider an extra 120 (let alone the possible 220) vehicles moving along Carr Hill Road per day, a probable route for the HGVs to access the crow edge site, would very likely have an impact on the residents given the lack of infrastructure for pedestrians along large stretches of this residential street.

In addition, this significant increase in the number of HGVs along Carr Hill Road will likely have a very detrimental effect on the road surface condition, likely leading to an increase in accidents, particularly to cyclist who use this road in large numbers to avoid the busier A635. This before you also consider the risk posed to cyclists by overtaking HGVs. Are there any assurances that Carr Hill Road will not be used by the HGVs and that they remain on the A635 where they can be "easily accommodated"? How will you pay for the upkeep and repair of these roads once damaged by the increased volume of HGVs?

With regards to the air quality assessment in section 10 of document 992471. Whilst I appreciate that there may be minimal problems with dust at the site, no comment has been made about the impact of the vehicle related pollution to the surrounding area as there will be "no change in current activity levels." However by their own admission current baseline activity at the site is zero so I am unable to see how an extra "120" vehicle movements per day isn't an increase. This seems like a deliberate oversight to avoid admitting to an obvious worsening in air pollution. Please see quoted sections below.

- 10.5.2 The extension will be worked as a continuation of existing activities. No changes to the extraction rate or vehicle movements are proposed. The extension will be worked using the existing traffic movements of the recently restored Bromley Farm Quarry.

- 10.5.3 The proposed development will therefore not introduce any increase of Annual Average Daily Traffic (AADT) in terms of light-duty vehicles (LDV) or heavy-duty vehicle (HDV). Vehicle emissions from heavy-duty vehicles will, therefore, remain unchanged in comparison to the existing baseline.

- 10.5.4 An assessment of vehicular emissions is not required and can be concluded as not significant.

Yet document 992471 also states:

"1.0.3 Bromley Farm Quarry ceased working mineral in 2014 and has since been restored by the importation of inert waste. The site was fully restored in early 2022 and is now in agricultural use for sheep grazing."

"12.8.1 There are currently no vehicle movements associated with the proposed location of the quarry extension."

My assumption here is that the developers are implying that there will be no worsening in air pollution compared to those levels seen in 2014. This is not the same as saying

that air quality and pollution levels will not be worse than they are at present and have been for the best part of the last decade. Also using 2014 as a “gold standard” for safe levels of pollution given research in this area since then feels like saying “it was ok n