

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
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 there 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. “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 is wrong Since 2014 a large number of papers have shown a clear link between vehicle related air pollution and many health problems including miscarriage, poor foetal growth/low birth weight, sudden infant death infertility, poor lung development in children, chronic lung disease in both children and adults, stroke cancer, cardiovascular disease and	

lung disease in both children and adults, stroke cancer, cardiovascular disease and death. Increased levels of air pollution have also been shown to worsen the severity of disease in people with chronic lung disease and increase need for medical intervention and hospital admissions. The HGVs associated with this site are some of the biggest contributors to air pollution. We should be aiming for a higher standard air quality not lower.

The evidence of the ill-effects of air pollution is clear enough that granting permission to a development that will, despite the above claims to the contrary, worsen air quality from the current base line (no activity at the site) and route traffic through residential areas and on routes adjacent to school access will have an absolute harm to the residents of Upper Cumberworth without offering an objective benefit to them. If the proposed campaign season is not followed then the effects of air pollution will be even greater .

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 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.

Should the applicant stick to there claimed 26 week "campaign" working model 220 HGV movements per day 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 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 accomodated"? who will pay for the upkeep and repair of these roads once damaged by the increased volume of HGVs?