

I strongly object to these proposals on several grounds relating to:

- 1) Noise pollution from quarrying activity
- 2) Inappropriate increase in HGV traffic in the locality (safety, noise, pollution, traffic)
- 3) Environmental impact
- 4) No benefit to local community / detrimental impact to neighbouring amenity

1) Noise impact:

The noise assessments presented are based on substandard un-representative baseline data taken over a 1 hour period at three properties on a Thursday in April 2022. The comparison of likely noise pollution against such a narrow baseline dataset is very likely to underestimate the true noise impact over the proposed working days, hours and period and is completely inadequate for the size and nature of the proposed development.

The assessment focusses on the three closest properties but fails to draw attention to the other affected properties as shown in the drawings at the back of the report. This needs to be highlighted to the residents of Cumberworth in a fair way, not buried in a report appendix.

NPPF technical guidance criteria of no more than 10dB change above background noise where possible, is exceeded in almost every modelled scenario (even with the poor baseline dataset), not just at the three closest properties but also across large residential areas of Upper Cumberworth. The application fails to draw attention to this, and in every case leans on the criteria for a maximum of 55dB being passable in cases where the 10dB change cannot be complied with. The increase in noise over the working periods and timeframe is significant in the context of the local environment and I feel this would be detrimental to mental well-being and that of the residents of Cumberworth. Most people have chosen to live in these villages for their rural, peaceful character, and wellbeing. Anyone in the impacted zones shown on the maps, including areas cleverly shaded green (which still show noise impact) will hear the quarry activity constantly, for example while in sat their gardens.

The KC consultation response from Environmental Health states that “Reference is made to the Minerals Planning Practice Guidance to the NPPF which states “Mineral planning authorities should aim to establish a noise limit, through a planning condition, at the noise-sensitive property that does not exceed the background noise level (LA90,1h) by more than 10dB(A) during normal working hours (0700-1900)”. All of the tables show the noise levels will meet with this limit and are therefore acceptable to all of the nearest NSRs.” This statement is incorrect. The tables within the noise assessment report show the 10dB criteria to be surpassed under all modelled scenarios at most NSRs and the council should re-review the assessment please.

The noise impact assessment fails to identify the large impact on all those who use the nearby footpaths. The footpaths across the site and down from Eunice Lane are much used and loved by local dog walkers, families, and visitors. The access to rural footpaths, nature and peaceful environment is central to the appeal of the villages, and a much loved aspect of living in this location. The constant noise from site activity will cause significant detrimental impact to neighbouring amenity. The same goes for the Eunice Lane play area.

The report and assessment refers to differing numbers of HGV movements. Has the assessment even been undertaken for the correct maximum number of HGV movements? This is unclear. The planning response from Environmental Health also highlights that clarity is required on the use of mobile crushing plant and the need to assess the noise impact of this.

2) HGV traffic

I agree with the many other objections regarding the unacceptable levels of noise, pollution, dust and safety risks associated with the increased HGV traffic through the village, which does not appear to have been properly considered. This is very concerning.

3) Environmental impact:

The previous use of the site included potentially contaminative land uses including historical landfill and spoil storage. There is a risk of mobilising contamination and polluting the Secondary A aquifer (a controlled water) along with down gradient receptors which may be reliant on baseflow from the aquifer. I note the Environment Agency requirement for a remediation strategy to ensure appropriate management and remediation. The conceptual site model presented in the Phase 1 assessment is simplistic, and does not take account of the pollution pathways associated with potential historical mine workings and higher permeability zones within the aquifer. The assessment also assumes 'best practice' on site before concluding low risk, without much detail of what that entails or how it would be regulated and monitored.

Extraction of incidental coal is not compliant with Kirklees Council's Strategic Aim and Vision of achieving Net Zero by 2038.

4) No benefit to the local community:

The quarry does not create new jobs or improve the local economy. The quarry only has negative impacts for the local environment, residents and visitors to the area.

The geology of the area is not unique and therefore cannot be essential for the supply to Crow Edge. There will be far better located resources, where extraction and transport to the site will not be so detrimental. Although there is some history of quarrying in the area, the scale and timeframe of this extraction is significant in comparison, and the importance of the quiet village character, liveability, and opinion of residents is very different to what it was when the original quarry was worked. I understand the need for resource and I am an advocate for development when undertaken in a sustainable way, with proper consideration of people, place/environment. Due to the location and nature of this proposed quarry I strongly object and hope that the council will not approve the application.

I also wanted to note (additional to the 500 word limit submitted through the online portal (14/08/23):

Air quality: I agree with the KC Environmental Health response regarding the inadequacy of the Air Quality assessment. An assessment needs to be undertaken which reflects the true nature of planned activity and HGV numbers and cumulative impacts adequately.

The assessment states that 'the distance to a dust-generating source is screened to distances of 250 m for a soft-rock quarry and 400 m for a hard-rock quarry'. The assessment then uses the 250m screening distance, stating that this criteria has been used due to the extraction of clay, a soft rock. The quarry proposals are however also for shale, a hard rock, therefore the assessment must include receptors within 400m and is currently insufficient.

I am also very worried that the assessment does not consider the air quality impacts off site e.g. on the transport route.

Access track

I agree with KC Conservation and Design consultation response regarding poorly thought out route of the access track. With the visual and noise impact it would surely be better located further south and further down gradient.

General

As a final note I would like to convey my shock and disappointment at the way in which this application has been managed, with so little consideration of how this will impact the residents and users of the villages of Upper and Lower Cumberworth. I live on Eunice Lane, close to the site and was only made aware of the plans by a concerned neighbour a week before the closing date of the objections. There has been no consultation or effort made with the community and everyone I have spoken to in the village feels a sense of outrage not only at the plans, but how they have been publicised (or not), and the timing of this when many people are on holiday. The local school was not even notified.

I urge this application to be overruled, and at the very least for dialogue to be opened up with members of the public so that appropriate and considerate mitigation measures can be agreed, for the many impacts operation of this site over such a long timeframe will bring.