

Comments on Planning Application 2023/62/91280/EO: Bromley Farm Quarry

The impacts of the Bromley Farm Quarry plans as they stand will be devastating for this tranquil and beautiful rural area, with inevitable damage to:

- the mental and physical health of residents and visitors, particularly children and the vulnerable
- the safety of residents and visitors, particularly pedestrians, dog walkers, ramblers and cyclists
- the diversity and security of local flora and fauna
- streams and ponds
- air quality
- the already overloaded and crumbling road infrastructure.

Those who live in Upper Cumberworth, Lower Cumberworth, Cumberworth and Denby Dale choose the area because it provides a predominantly tranquil, green, and scenic setting in which to live and thrive.

The plans set out in the current planning application will destroy the beauty and peace of this stunning area and seriously damage the quality of life of those who live here.

Inadequate consultation

Even the title of the project is misleading: this project is not, as Wavin states, “an extension” to the existing quarry: it is an entirely new quarry, and must not therefore assume that earlier test data, permissions and allowances can be re-used for the current application.

This planning application, its associated assessments and consultations and its timing are both flawed and cynical. The public consultation period ran for just a few weeks over the recent summer holidays, when many local residents would be on holiday, and thus, unaware of its existence. In addition, Wavin felt it needed to notify only 26 households of its application, when in fact the huge impacts will fall on hundreds of local households, farms and workplaces, not to mention Cumberworth First School, which Wavin chose to ignore. I’m horrified (if not surprised) that such a large organisation feels it appropriate to act in such a derisory and neglectful manner. I trust that Wavin will indeed be made to comply in full with Kirklees Council’s statement that “It is an important principle of decision-making that the [planning] process is open and transparent” and significantly extend its consultation with our community.

Benefits to the local community

There are no benefits whatsoever to the affected community. There will be no new jobs for local people, and no benefits at all to the local economy. Indeed, any economic impacts are likely to be negative: who, for example, would want to start new businesses in an area where large, dirty trucks ply crowded and inadequate roads every few minutes and consequential traffic jams are created even where the trucks do not pass? The impacts on

our local community will be only negative: damage to our health, our lives, our homes, house prices and natural environment.

Traffic, roads and safety

(a) Traffic levels

Our village roads are already far busier than their width and structure can support, and as a result they are in a poor and often dangerous state. Huge articulated lorries from their bases on Coal Pit Lane, Lower Cumberworth, already travel (often far too fast) along our narrow roads, posing major threats to pedestrians and causing frequent jams when they meet oncoming vehicles. However, the frequency of these vehicles is dwarfed by that of the heavy waggons which Wavin plans to send along our local roads every 5-6 minutes (the figures given are inconsistent and therefore unclear). If the application is granted, at least 120 heavy trucks per day for the next 25 years will enter and leave the site between 7am and 6pm Mon-Fri, and 7.30 – 1pm on Saturdays, spreading slippery slurry along the routes, thus making them more dangerous still. This proposed increase in heavy vehicle traffic is terrifying in terms of the safety, health and wellbeing of residents and road users, and the costs to Kirklees Council in additional road repairs will be enormous.

Furthermore, the notion that there is “no change” in vehicle movements compared with the earlier quarrying activities because the application is for an extension to the previous quarry is of course unacceptable: the plans are in truth for a *new* quarry involving operations far larger than before. Most local residents have already lived through the earlier quarrying operation and we are not stupid: the number of vehicles involved then was a fraction of the 120 planned to move daily along our tiny and already-crowded roads. Thus, the levels of air pollution, noise, dirt, dust and serious road user/pedestrian hazards will also be greatly increased.

(b) Safety

The planned route between the Bromley Farm site and Crow Edge would most probably require the heavy quarry traffic to use either the Sovereign crossroads or Carr Hill Road. The Sovereign crossroads is already dangerous and queue-ridden. Trucks turning left onto Carr Hill Road would be particularly hazardous to parents (often with prams and buggies) walking their children to and from school, and to the many cyclists, dog walkers, hikers, and elderly or vulnerable pedestrians using Carr Hill Road, which has no footways. The required 2m between pedestrians and vehicles would inevitably mean that the trucks passing along the road every few minutes would have to move to the oncoming traffic lane in order to provide a safe distance. Clearly, especially given the frequency of the trucks, this situation would be highly dangerous, cause constant traffic jams, and worst of all, put lives at risk six days a week.

In addition, the increased traffic and obstructions caused by the trucks will inevitably divert a great deal of traffic to other routes, many of which (such as Cumberworth Lane, Top Road, Coal Pit Lane, Barncliffe Hill, etc) are narrow and would be extremely hazardous under heavy traffic.

Noise pollution

The quarry site and the operational and traffic noise it creates will have a massive negative impact on local residents and pedestrians.

I concur with others' objections to the sub-standard and unrepresentative baseline data noise assessments which, outrageously, were 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 almost inevitably underestimates the true noise levels (from excavators, trucks and the highly intrusive reversing beepers of on-site vehicles) over the proposed working days, hours and the 25-year project period: it is completely inadequate given the size and nature of the proposed development. Even given the unreliable baseline data, the NPPF technical guidance criteria of 'no more than 10dB change above background noise' is exceeded in nearly every modelled scenario, not just at the three closest properties but across most of Upper and Lower Cumberworth. What's more, the application relies on the maximum 55dB criterion, which should only be used where the 10dB maximum *cannot* be met and not where an operator *chooses not to comply*. Even using Wavin's own maps, noise pollution will increase greatly throughout the duration of this generation-long project.

Ecology and biodiversity

The assessment that "no sites protected by statutory or non-statutory nature conservation designations would be directly or indirectly affected by the development proposals." (Section 5.0 – NonTechnical Summary) is absurd.

This rural area is home to a vast range of flora and fauna, including many Section 41 Species of Principal Importance in Kirklees. Specific to the planned 'development' area, these include:

- deer, which often frequent the fields and woodland on and around the proposed quarry area (I know from personal experience that these beautiful creatures have inhabited the area for more than 40 years)
- badgers
- bats
- Eurasian curlews, skylarks (which nest in the fields to be quarried), owls, song thrushes, yellowhammers
- many butterflies, beetles and dragonflies
- orchids
- and many, many more.

The planned quarry and the areas surrounding its transport routes are primarily wild areas, rich in both flora and fauna, and the noise and pollution of these 'developments' will pose a serious threat to much of this precious wildlife.

It is hard to see how the destruction of prime biodiversity sites such as this supports Kirklees Council's commitment "to protect and enhance the biodiversity and geodiversity of Kirklees."

Air quality

The quarry will generate airborne dust from the clay, the shale and incidental coal, yet the assessment of such dust uses only a 250m screening distance. This would be appropriate were the quarry producing only soft-rock clay. However, the screening distance requirement for hard rocks such as shale and coal is 400m. Indeed Silkstone Environmental's assessment document states this clearly at 5.4.2. : "The first stage of the guidance is to determine the scale of the assessment needed by reviewing whether there are sensitive receptors within distances of either 250m of soft-rock extraction or 400m of hard-rock extraction." Yet at section 7.7.11, it contradicts itself, asserting that: "In accordance with the IAQM Minerals Guidance, only dust-generating operations within 250m of the sensitive receptor require assessment." This clearly needs coherent reassessment using the appropriate 400m hard-rock screening distance requirement.

I applaud the Kirklees Council Environmental Health response to the applicant's inadequate Air Quality Assessment and trust that a fully appropriate and accurate assessment will be provided. This should also include a professional assessment of the air quality impacts along and around the truck routes to Crow Edge.

Conclusion

Given the abundance of clay and shale deposits across the country, it seems absurd to excavate these minerals in an area where road infrastructure is totally inadequate, and where it will inevitably destroy an outstandingly beautiful, peaceful and biodiverse environment.

The prospect of 25 years of heavy, dangerous traffic, environmental damage and destruction, noise, dust and slurry at the hands of huge organisations – and without a single benefit in return – is quite simply, devastating, though I strongly suspect that the applicant and its global owner won't care one jot about that. As a Kirklees resident who has long treasured and respected the beauty and tranquillity of our rural homeland (and who trusted and helped vote in the current Labour Council), I sincerely hope that Kirklees will care a great deal more.
