

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2023/91280 Bromley Farm Quarry, Barnsley Road, Upper Cumberworth, Huddersfield, HD8 8PD		
Quarrying operations for the extraction of clay, shale and incidental coal and subsequent restoration by means of importation of inert wastes		
Date Responded: 9th November 2023	Responding Officer: RM	Responding Ref: WK/202332696
We have reviewed the application and submitted information and make the following comments and recommendations. Air Quality We acknowledge the submission of a new Air Quality and Dust Assessment by Miller Goodall (Dated: 3rd October 2023) (ref: 102882-2). It assesses the potential impacts associated with dust generating operations during the working of the new quarry, and the impact this will have on existing sensitive receptors. The assessment also considers changes in air quality caused by vehicle emissions namely HDVs (Heavy Duty Vehicles) travelling to and from the quarry. <u>Disamenity Dust</u> Dust from quarrying operations has the potential to impact local communities due to visible dust plumes and dust soiling of property. This courser visible dust is referred to by the Institute of Air Quality Management (IAQM) as disamenity dust. An assessment of disamenity dust has been completed for each of the five operational phases including restoration of the quarry. This has been undertaken in accordance with the source- pathway- receptor methodology as recommended in the IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning. The assessment includes the potential impact on five sensitive receptor locations which have been identified as being within 250m down-wind of potential dust-generating operations. Pathway effectiveness calculations have been undertaken based on meteorological data and dry day wind direction, these are worse case exposure calculations as many factors will reduce the potential for dust generation during the day to day working of the proposed quarry. The report concludes there will be a “negligible dust effect” at each sensitive receptor and that dust emissions can be controlled through the implementation of a Dust Mitigation Plan. <u>Road Traffic Assessment</u> It is estimated that the proposed quarry operations could result in up to a maximum of 60 loads per day equating to 120 heavy – duty (HDV) two-way traffic movements to and from the quarry to Crow Edge. The proposed development is not within an Air Quality Management Area (Air Quality Management Area). However, according to the Institute of Air Quality Management/ Environmental Protection UK (IAQM/EPUK) guidance “Planning for Air Quality”, where there is a change of 100 AADT (Annual Average Daily Traffic) movements outside an AQMA an Air Quality Impact Assessment is required. An air quality assessment was undertaken in accordance with national guidance to assess the potential changes in air quality arising from vehicle emissions because of the proposed quarry, and the impact this will have on existing sensitive receptors. Four existing sensitive receptor locations were identified due to their proximity to the road links affected by the HDV movements. Modelling using ADMS-Roads dispersion model was used to predict changes in		

concentrations of Nitrogen Dioxide (NO₂) and Particulates (PM₁₀ and PM_{2.5}) using traffic data taken from the Department for Transport. A Temprow growth factor was applied to uplift the traffic from 2019 to 2024 to account for future expected increases in traffic generation due to other committed developments. The model assessment was based on the following 3 scenarios:

- Scenario 1: 2019 - base year
- Scenario 2: 2024 - opening year 'without development and
- Scenario 3: 2024 - opening year 'with development'

The assessment concludes that the annual mean concentrations for NO₂, PM₁₀ and PM_{2.5} are predicted to be below the respective air quality objectives at all existing sensitive receptor locations within the study area for both the "with" and "without" the development scenarios.

We agree with the methodology used and accept the Air Quality and Dust Assessment.

Dust Management Plan

A Dust Management Plan (DMP) by Silkstone Environmental Ltd (dated: January 2023) has been submitted in Appendix E of the Air Quality and Dust Assessment by Miller Goodall (ref:102882-2) (dated: 3rd October 2023).

The Dust Management Plan provides a summary of operations at the extension site, and sets out the measures to control, mitigate and measure dust emissions throughout the lifetime of the operations to prevent loss of amenity to nearby sensitive receptors. We also note that in the plan titled 'Site Office & Wheel Bath Location' Dwg. No 22007/513 a permanent wheel bath fixture is proposed which has not been referenced in the Dust Management Plan.

Whilst we agree in principle with the Dust Management Plan, we would expect it to include the installation of a permanent wheel wash to avoid trackout from off-site transportation onto the main highway in accordance with the IAQM Guidance on the Assessment of Mineral Dust Impacts for Planning, Table 4 Good Practice Mitigation. We also note that in Table 1 of Appendix A that the water bowser will be checked to ensure that it is operating correctly on a weekly basis, and we expect that this is checked daily to comply with good practice dust mitigation. Therefore, we recommend the following conditions.

Recommendations

DUST1 Implement agreed Dust Mitigation Scheme – Condition

Before quarrying operations commence, the mitigation measures to control fugitive dust emissions during the operational phase of the development shall be implemented in accordance with those detailed in the Dust Management Plan (DMP) by Silkstone Environmental Ltd (dated: January 2023) in Appendix E of the Air Quality and Dust Assessment by Miller Goodall (ref:102882-2) (dated: 3rd October 2023) and retained for the duration of the lifetime of the quarry.

Reason: To safeguard the amenities of the occupiers of nearby properties in accordance with part 15 of the NPPF and LP52 of the Local Plan.

Wheel Bath - Condition

Before quarrying operations commence, details of the wheel bath fixture, as shown in the plan

titled Site Office & Wheel Bath Location Dwg. No 22007/513, including its location and maintenance shall be submitted to and approved in writing to the Local Planning Authority.

Reason: To safeguard the amenities of the occupiers of nearby properties in accordance with part 15 of the NPPF and LP52 of the Local Plan.