

Objection Evidence in respects of Bromley Farm Quarry

**Application number 2023/91280- Application relating to Quarrying at Bromley Farm
Upper Cumberworth**

Introduction :

This report consolidates evidence relating to the Paragon Highways Transport Statement submitted as part of the planning application , details as above and relating to the statement in the Planning bundle. :
October 2022 – Project number 2074A

The report submits evidence in support of objections already lodged relating to traffic and risk associated with this development . It has been specifically commissioned and undertaken with a highways and transport industry specialist . As such, as well as providing hard evidence to substantiate resident concerns, it illustrates the inadequacy , limitation and cursory nature of the Transport Statement completed by Paragon Highways.

It sets out a risk appraisal , absent from existing papers , and highlights the hazardous nature should any approval be granted for this development to proceed.

The information in this report is material to any decision making by Kirklees council and as such should be considered and referred to in decision making for the purposes of transparency.

The existing statement contains significant inaccuracies and insufficient information to enable a reasonable and justifiable decision by the Planning Committee.

In order to justify this statement the commissioning of an industry expert to support a a Traffic Survey at the Bromley Farm Refuse Tip access/A635 junction site was deemed appropriate and necessary. This is particularly relevant given the councils failure to listen and address historic concerns raised or to undertake any relevant highways assessment using its resources

Methodology

This covered the proposed Quarries working hours, commencing on Saturday 24th February and completing on Friday 1st March 2024. The hours surveyed was Saturday 6 hours (7.00am-1.00pm) and then 2 hours daily from Monday – Friday. The hours during the week were staggered, Mon. 7-9am, Tue 9-11am; Wed 11-1pm, Thu 1-3pm and Fri 3-5pm, the information reported from this survey facilitates factual everyday set of evidence that is comprehensive and that extends beyond the cursory consideration of Paragon Highways. It illustrates how this project will have a major impact on our community of Cumberworth , upper Cumberworth , and Lower Cumberworth and the areas along the proposed routing of HGV traffic.

For ease findings stating Paragon's document reference number and our comments are as follows:-

Transport Statement Document No.	Comments
1.1.2.	Paragon Highways (PH) state their report demonstrates that the proposals should be acceptable. Question: Where is the information regarding traffic impact, with an additional 120 HGV movements using the junction daily there has to be disruption to the local network? Conclusion: Transparent statement by PH, no information.
2.1.4.	(PH) state that traffic movements along the route are moderate. Question: Where is the traffic movement information for people using the refuse tip facilities? Conclusion: Transparent statement by PH, no information.
2.1.5. 2.1.5. (cont'd)	(PH) central carriageway hatching and slow markings. Information: From kerbside to the hatching line measures 5.08m this would allow a car to pass on the inside if the HGV was positioned correctly in the hatching, but the measurement is insufficient to allow another HGV to pass, this would cause delays. Conclusion: Transparent statement by PH, no information.
2.1.6.	(PH) mention a bus route. Information: there are two bus stops, either side of the road, within 50m of the junction into the refuse tip, three different buses routes 350/353/X1 and Shelley College use this route, and in the proposed Quarry working day a movement of 26 buses will use this road. Conclusion: Transparent statement by PH, no information.
2.1.8.	(PH) accident records for the last 5 years Question: with the scale of the impact of the proposed Quarry further investigations should have been made other than using Crashmap, with 120 HGV's movements at the junction and the same HGV's using the Refuse Tip road, where is the Risk Assessment for HGV's and public

	vehicles accessing the Refuse Tip? (Risk Assessment Provided by community) Conclusion: Transparent statement by PH, no information.
2.1.9.	(PH) no collisions within the vicinity of the site, therefore it can be assumed that the access and surrounding highway network appear to operate safely. The use of Crashmap data, which records only police logged incidents, is a crude and limited tool to assess road safety and risk. Question: with an additional 120 HGV's movements entering and exiting the Refuse Tip, they will be turning left and right, where is the investigation to assume it will be safe? Conclusion: Transparent statement by PH, no information.
2.1.10.	(PH) does not indicate a road safety problem or any concern as a result of the minor additional use of the quarry. Information: from the Quarry Survey 11 HGV's entered the Refuse Tip daily, (PH) are proposing 120 HGV's that will be an increase of 90.8% is that a minor addition, again where is the Risk Assessment for this safety issue? Further where is the definition of minor ?. With regards to Section 5 Traffic impact, comments regarding this section have been submitted to Kirklees previously. Conclusion: Transparent statement by PH, no information.
5.1.2.	(PH) there are currently no vehicle movements associated with the proposed location of the Quarry extension.
5.1.2. (Cont'd)	Information: currently vehicles and HGV's are using the same access road that would be used for the Quarry extension, from the Quarry Survey it can be noted that there are approximately 272 vehicles daily using the Refuse Tip. Conclusion: Transparent statement by PH, incorrect information.
CONCLUSIONS	
There is no doubt that the Transport Statement is a very important document for the purposes of planning and should contain accurate information to provide to the local community to give them the confidence that the proposed project can	

operate in a safe environment for all of the residents concerned. As can be seen by the comments above, Paragon Highways have failed to meet this criterion by the inadequacy and limitations of their report. This is illustrated above. The following are facts which have originated from the Traffic Surveys which was commissioned, at the communities expense, with the support of an experienced industry professional. The Survey summary sheets are attached as well as Risk Assessments. Should you require the daily survey sheets for inspection they are available on request, our directive throughout this survey has been to be fully transparent, therefore our concerns are factual and not statements as made by others to ensure the project is implemented.

- **Passing Traffic** - Currently during the weekly working hours of the proposed Quarry there was 1292 movements by HGV's, Paragon Highways (PH) propose another 680, this will result in a 52.6% increase in the movements of HGV's passing the junction on the A635 Barnsley Road leading into the Bromley Farm Quarry Refuse site. Please note our survey was over a 10 hour day, based on a driver's hours of 9 hours the percentage figure would be increased, i.e. our movement figures would be less.
- **Junction Traffic** - Currently during the weekly working hours there was 1003 movements of Cars/Vans and HGV's(7) entering the Refuse Tip from Upper Cumberworth and 498 Cars/Vans and HGV's(52) entering from Denby Dale. 795 Cars/Vans and 16 HGV's were recorded leaving the Refuse Tip and turning right heading towards Upper Cumberworth, this means of the 1821 movements entering the tip 43.7% will be entering a junction on the A635 that will see an increase in passing traffic (as above 52.6%). To also be considered is the 60 restoration HGV's movements, we appreciate it is unknown where the material is coming from but there is every chance it will be coming in from the Denby Dale direction and this will mean turning right into the Refuse Tip access road, the current junction layout is far from adequate and is a Health & Safety hazard issue. (Risk Assessment attached Doc-3).
- **Restoration Material** – Not knowing where the material is coming from is a major concern, this material is extracted daily, not stored, therefore our surrounding roads will be affected by these movements, HGV's passing schools, shopping high streets etc.
- **Refuse Tip Access Road** – This is a road used by the public, and is not wide enough; previous correspondence provided detailed Health & Safety requirements and the road width is insufficient. With the movements of HGV's increasing on this section of the road by 91% is a Health & Safety hazard. (Risk Assessment attached Doc-4).

The information recorded in this report is based on this survey activity, a previous document with additional important information regarding the Transport Statement has been submitted to Kirklees Council and needs to be read in conjunction with this report.

SUMMARY BROMLEY FARM QUARRY – TRAFFIC SURVEY

Date and Survey Time	Passing Vehicles from Upper Cumberworth Direction					Passing Vehicles from Denby Dale Direction					Entering Tip from Upper Cumberworth		Entering Tip from Denby Dale		Leave Tip Head Towards Upper Cumberworth		Leave Tip Head Towards Denby Dale		Total Move-ments
	Cars and Vans	HGV's	Motor Cyclist	Pedal Cyclist	Pedest-rians	Cars and Vans	HGV's	Motor Cyclist	Pedal Cyclist	Pedest-rians	Cars and Vans	HGV's	Cars and Vans	HGV's	Cars and Vans	HGV's	Cars and Vans	HGV's	
24.02.24. 7 - 9am	323	8	1	3	10	217	2	0	5	6	10	0	5	1	5	1	6	0	603
24.02.24. 9 - 11am	759	11	4	9	7	433	9	14	11	2	56	1	21	0	34	0	34	0	1405
24.02.24. 11 – 1pm	622	7	1	6	11	598	5	5	5	11	67	1	37	1	56	0	41	0	1474
26.02.24. 7 - 9am	863	23	0	0	3	531	32	0	0	5	10	0	5	4	5	1	7	2	1491
27.02.24. 9 - 11am	549	22	2	0	4	404	33	1	0	3	37	0	25	3	36	1	22	0	1142
28.02.24. 11 – 1pm	301	31	1	3	6	448	33	1	3	2	46	0	28	1	35	0	26	0	965
29.02.24. 1 – 3pm	437	19	3	2	8	558	18	2	1	3	67	1	24	2	52	1	33	2	1233
01.03.24. 3 – 5pm	582	18	0	0	8	776	21	0	0	5	14	0	5	0	12	0	8	0	1449
TOTAL Saturday Movements	1704	26	6	18	28	1248	16	19	21	19	133	2	63	2	95	1	81	0	
TOTAL Daily Weekday Movements	2732	113	6	5	29	2717	137	4	4	18	174	1	87	10	140	3	96	4	

BROMLEY FARM TRAFFIC SURVEY - ADDITIONAL INFORMATION
OBSERVED DURING SURVEY

OBSERVATIONS

Misc. Opening of Tip Gates 7.15am Saturday

- 2 Vans Parked by side of road on exit from Tip, one behind the other, causing a hazard at junction, parked for 10 minutes
- Setting-up traffic lights approximately 350m from Tip entrance heading towards Denby, 2 vans parked in entrance exchanging cones, one van blocking Entrance (5mins)
- Operation of Traffic Lights 350m away was close to becoming a hazard for vehicles entering/exiting Tip entrance
- Speeding vehicles, including two vehicles racing one another

1. Buses - Daily and on occasions causing traffic movement delays
2. Ambulance/Police – Blue Lights
3. Vehicles Turning around in entrance to Tip
4. Tractors – Slow moving causing traffic to build-up behind them
5. JCB

Date	Misc.	Ref – 1	Ref – 2	Ref – 3	Ref – 4	Ref – 5			
24.02.24 Sat 7-9am	Gates open	3	1						
24.02.24 Sat 9-11am		1	3	1	1				
24.02.24 Sat 11-1pm		5			4				
26.02.24 Mon 7-9am		5				1			
27.02.24 Tue 9-11am	2 Vans Set-up Traff.Li Operation of Traffic Lights	1		3	1				
28.02.24 Wed 11-1pm		5		1 HGV Artic 2 cars	4				
29.02.24 Thu 1-3pm		4		3		2			
01.03.24 Fri 3-5pm		2			3				

RISK ASSESSMENT

Road Junction Traffic On the A635 Barnsley Road Accessing the Bromley Farm Refuse Tip			Document No.	RA03
			Issue date	March 2024
			Review Due	March 2025
			Approved by:	

Generic Risks

NO	PERSONS AT RISK	IDENTIFIABLE HAZARD	RISK			CONTROL MEASURES TO BE PUT IN PLACE	RESIDUAL RISK		
			P	S	R		P	S	R
1	All	Injuries to members of the public, pedestrians, Joggers (including children, people with prams, the elderly and those with disabilities) whilst walking near or crossing the road junction.	2	3	6	Significant control measures: - Ensure routes for pedestrians are maintained and suitable and adequate signs are to be put in place to advise and warn pedestrians away from hazards and to indicate safe routes, members of the public are prohibited from accessing the Tip on foot by signage or barriers. - The paving area to be segregated to ensure public, pedestrians, and children are excluded from HGV's turning area. Install appropriate barriers. - Improve entrance to Refuse Tip junction, the existing corner radius's are insufficient for a HGV's to turn into site without entering the road hatchings. - Widening of road at junction to allow traffic to flow in order to prevent congestion and cause delay factors for emergency services. - Correct signage to be installed at all appropriate places. - Bus stops to be re-sited closer to Upper Cumberworth. - Prevent turning in entrance by using appropriate signage.	1	3	M
2	All	Injuries to pedal cyclists and motor cyclists from traffic whilst passing through the junction.	2	3	6		1	3	M
3	All	Daily, three bus and school routes, bus stops either side road within 50m of junction.	2	3	6		1	3	M
4	All	Slow moving vehicles, tractors, encouraging vehicles to enter hatchings to overtake.	2	3	6		1	3	M
5	All	Passing Emergency Vehicles	1	2	2		1	2	M
6	All	Vehicles turning around in entrance to Refuse Tip	2	3	6		1	3	M
7	All	Articulated/Rigid tippers from Upper Cumberworth entering road hatchings to turn LEFT into Refuse Tip entrance, a manoeuvre that allows pedal/motor cycles to proceed on the inside of the HGV.	3	3	9		1	3	M
8	All	HGV's turning into Refuse Tip entrance from Denby Dale. Road hatchings insufficient to allow another HGV to pass on the inside,	3	1	3		1	3	M

RISK ASSESSMENT

Road Junction Traffic On the A635 Barnsley Road Accessing the Bromley Farm Refuse Tip						Document No. RA03 Issue date March 2024 Review Due March 2025 Approved by:
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Generic Risks

NO	PERSONS AT RISK	IDENTIFIABLE HAZARD	RISK			CONTROL MEASURES TO BE PUT IN PLACE	RESIDUAL RISK		
			P	S	R		P	S	R
8	All	(Cont'd) causing congestion by waiting traffic to pass.	3	1	3		1	3	M

THIS GENERIC RISK ASSESSMENT IS INTENDED AS A GUIDE ONLY AND DOES NOT REPLACE THE NEED FOR SITE SPECIFIC RISKS TO BE ASSESSED

Risk Assessment Notes

Definitions	
ACCIDENT	An unplanned, uncontrolled event which has led to damage, ill health or injury
HAZARD	A condition or practice with the potential to cause harm, damage, ill health, injury or other loss
RISK	The combination of the probability that a HAZARD will result in an ACCIDENT and the severity of that ACCIDENT
PROBABILITY	The likelihood of an accident occurring
SEVERITY	The outcome of accident

Key						
Probability (P)	Severity (S)		S=1	S=2	S=3	
1 = Unlikely	1 = Minor	P=1	L	L	M	L = Acceptable Risk, reduce if possible
2 = Possible	2 = Serious	P=2	L	M	H	M = Tolerable Risk, reduce using control measures
3 = Probable	3 = Major	P=3	M	H	H	H = Unacceptable risk, re-assess hazard

RISK ASSESSMENT

Refuse Tip Access Road	Document No. RA04 Issue date March 2024 Review Due March 2025 Approved by:
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Generic Risks

NO	PERSONS AT RISK	IDENTIFIABLE HAZARD	RISK			CONTROL MEASURES TO BE PUT IN PLACE	RESIDUAL RISK		
			P	S	R		P	S	R
1	All	When entering the Refuse Tip from the junction after 30m the access road narrows to 5.3m wide and is at the bottom of a brow of a hill. This width is not wide enough for two HGV's to pass, the distance is not sufficient for a HGV and car to pass.	3	2	6	Significant control measures: - In general the access road is not safe to be considered for a quarry road, the Health & Safety Executive states for Quarry Vehicles and Edge Protection the road needs to be wide enough to allow vehicles to pass with ease, for two-way roads they should be three and one times the width of the largest vehicle using the road, these are the minimum acceptable widths. Therefore width of road needs to be 8.92 metres wide, existing road is unsafe for passing. The hazards are an unacceptable Risk and there is every probability of an accident occurring. - Additional signage to inform pedestrians and ramblers using the public right of way of HGV traffic movements and indicate safe routes. - Wheel washing facilities to be installed to control dust and prevent mud from being transferred from site to the access road.	3	2	H
2	All	At this point the HGV will be travelling up the hill not knowing what traffic is coming in the opposite direction, should two vehicles meet one would have to reverse.	3	3	9		3	2	H
3	All	Further along the road it widens to 5.5m, this is still not sufficient for two HGV's to pass.	3	3	6		3	2	H
4	All	The make-up of the road was not constructed for the usage of 120 HGV's movements each day. The edging has no kerbs; HGV's would be using the road to its extreme and It is likely the road would collapse.	3	3	9		3	3	H
5	All	There are two passing places, the bays in length are not long enough for HGV's to park parallel to the edge, should two vehicles meet one would have to reverse.	3	2	6		3	2	H

RISK ASSESSMENT

Refuse Tip Access Road	Document No. RA04 Issue date March 2024 Review Due March 2025 Approved by:
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Generic Risks

NO	PERSONS AT RISK	IDENTIFIABLE HAZARD	RISK			CONTROL MEASURES TO BE PUT IN PLACE	RESIDUAL RISK		
			P	S	R		P	S	R
6	All	Public right of way that crosses the access of the site/Refuse Tip.	3	2	6		2	2	M
7	All	The works will create dust and be an inconvenience to the general public, hazardous to the eyes and breathing.	2	1	2		1	1	2

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3 = Probable	3 = Major	P=3	M	H	H	H = Unacceptable risk, re-assess hazard

RISK ASSESSMENT

Refuse Tip Access Road	<table><tr><td>Document No.</td><td>RA04</td></tr><tr><td>Issue date</td><td>March 2024</td></tr><tr><td>Review Due</td><td>March 2025</td></tr><tr><td>Approved by:</td><td></td></tr></table>	Document No.	RA04	Issue date	March 2024	Review Due	March 2025	Approved by:	
Document No.	RA04								
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