

**Consultation Response from Chris Bembridge KC,  
Highways Development Management**

**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: 12/09/2024**

**Responding Officer: CNB**

**Responding Ref: K17-3/6**

This application is for the formation of a new quarry utilising the existing access of a previous and now depleted and refilled quarry on to A635 Barnsley Road, a 40mph two-way single carriageway primary distributor road of approximately 9m width with footways on the side of the application site and street lighting present. There is a hatched central reserve and a right turn lane in to the site.

The road hosts a medium frequency bus route and there are stops within 1km of the centre of the proposed site.

The most recent DfT manual traffic count done on A635 (just east of Britannia Crossroads) was July 2019 and indicates an AADF of 7685 vehicles with approximately 4% of these being HGVs. A similar volume of vehicles would be expected passing the access of the site.

The application was accompanied by a Transport Statement from Paragon Highways dated Oct 2022, a Transport Statement Addendum dated May 2024, and a Non-Technical Summary prepared by Silkstone Environmental Ltd and dated May 2023 (Rev A). An additional swept path analysis was requested for the Penistone Road/Cumberworth Lane junction and submitted June 2024 with a Transport Statement Addendum No1 containing details and results of a survey and capacity analysis at the A635 Barnsley Road/A629 Penistone Road junction submitted 12/06/2024.

#### Trip Generation

The proposals are worded as to extend an existing quarry, however the existing quarry appears to be infilled and the proposed extension is a new quarry using an existing access. We consider that because of this, all trips to the site should be viewed as new trips on the local highway network.

The Transport Statement proposed that 60 two-way trips per day will be required to carry out the excavation and infill over the period of 25 years. The non-technical summary indicates that the extraction will therefore be approximately 30,000 tonnes of material per annum, but this would fluctuate subject to market demand and so extraction would be carried out on a “campaign” basis (stated in the document as being “typically between March to September” and “this will continue for the remaining lifetime of the site”).

These figures appear to exclude the 10,000 tonnes of coal that is estimated to be within the site, as mentioned in the document, although only coal that is suitable for industrial uses will be transported off site. There is no indication if this coal will be included within the 60 two-way movements per day or if it would be exported outside of the “campaign” time periods? This information should be provided.

This number of trips would be classed as new trips given that the existing quarry ceased production several years ago and this would indicate an intensification of use of the access by heavy vehicles.

The applicant indicated that the type of vehicle used to deliver the extracted mineral was to be an articulated HGV, however some other information contained within the application refers to rigid 3 and 4 axle vehicles. The type and size of vehicle to be used should be confirmed.

#### Access to the site

Access to the new quarry is via a private driveway off A635 Barnsley Road that is a shared public access to the Bromley Farm Household Waste Recycling Centre and is also bisected by a PROW Footpath DEN/84/10. The access has an existing bell mouth with a 10m kerb radius (indicated at 7m in the TA but measured at 10m from maps/ariel photographs) which would be acceptable for the proposed

use and vehicles expected to use the site. There is adequate visibility at the junction for the 40mph posted speed along Barnsley Road with visibility splays exceeding the published requirements in both directions. There have been no injury-accident collisions recorded at the junction within the past 5 years and so we must assume that the junction is currently operating safely.

There is an existing right turn lane at the access to assist vehicles turning right into the site. The route proposed for the removal of the main mineral would not use this right turn lane in normal use.

The driveway is approximately 270m between the A635 and the proposed quarry access and is approximately 5m wide with three passing places where the width increases to approximately 7m and these are adjacent to the junction with A635 Barnsley Road and approximately 65m and 180m up the driveway. The driveway climbs quite steeply up from A635 Barnsley Road for approximately 100m with a blind summit at the top. From this first blind summit there is a shallower gradient upwards to a second blind summit adjacent to the upper passing point.

There have been highway safety concerns raised with the current use of the access driveway and with the expected intensification of use we expect that these concerns will increase.

We would consider that the existing layout of the access driveway (5m width with passing places) would be unsuitable for the intensification of use caused by the proposals and would request that, as the applicant owns the land adjacent to the driveway, the driveway should be widened to 6m along its full length between A635 and the access to the proposed quarry to allow two HGVs to safely pass. This should be completed prior to the quarrying work commencing. Drawing No 22007/501 Rev A indicates that the land on either side of the access driveway is in the control of the applicant and so this safety improvement is within the gift of the applicant.

The access from the driveway into the quarry was shown on drawing No 2074-103 Rev A with a junction radius of 10m and a width of approximately 23m at the bell mouth, narrowing to 10.5m. The initial 50m of the access is to be hard surfaced to limit any mud or debris from being dragged on to the shared private driveway.

There is also a security gate indicated on the drawing and is shown set back approximately 10m from the edge of the existing shared driveway, this would be insufficient for a 16.5m articulated vehicle to fully pull clear of the shared driveway whilst waiting for the gate to be opened and would cause an obstruction causing a highway safety concern. We would like to see the gate relocated with a setback of approximately 17m from the edge of the existing shared driveway. This can be conditioned if required.

A swept path analysis showing the access from the driveway in to the quarry site was submitted showing the swept path of a 16.5m articulated six axle vehicle and this is acceptable. This type and size of vehicle was confirmed by the applicant as being the type expected to operate at the quarry.

Drawing No 22007/513 indicates that the initial 50m of the internal site access road will be finished with a solid impermeable surface (concrete). This would form a solid join with the shared access road and would reduce the incidence of mud and debris being dragged on to the shared driveway in conjunction with suitable wheel washing facilities.

Details were also included on drawing No 22007/513 to indicate the location of the wheel washing facilities adjacent to the access point on the concrete apron, this is to avoid mud and quarry debris from

being dragged on to the shared driveway or even the adopted highway for highway safety reasons. The continued use of the wheel washing facilities should be conditioned to last for the lifetime of the development, including infill.

The internal layout of the site beyond the access gate would be private and not accessible to the general public and so would be subject to operational controls rather than highways standards and regulations.

#### Transport Route

The application statements have indicated that the minerals quarried at the proposed site will be used in the production of pipes for Wavin at their Crow Edge works, located on the A616 Sheffield Road, within the boundary of Barnsley District.

A transport route was proposed for the trips using unclassified roads between A629 Penistone Road and A616 Sheffield Road. Many of these roads are rural in nature and not used to frequent HGV traffic. A swept path analysis was requested for the junction of A629 Penistone Road and Cumberworth Lane as we were concerned that two of the proposed 16.5m articulated vehicles might not be able to access/egress the junction safely if they arrived at the same time. It is noted that the provided swept path (drawing No 0001 from Paragon Highways) shows a swept path for an 8.75m rigid three axle heavy duty tipper (although the vehicle on the analysis drawing appears to have 4 axles) and not the 16.5m articulated vehicles that were proposed to be used for the deliveries (and used for the swept path analysis at the site access junction).

It is noted that many of the unclassified roads along the proposed route do not have segregated pedestrian footways and are considered unsuitable for frequent increased use by HGVs may be a highway safety concern because of this.

We consider that there may still be highway safety concerns using this route and so we would prefer that the route between the proposal site and the pipe works is carried out on the all-purpose A-class highway network as this has been designed for the use of all standard goods vehicles. The length of the route using A-class roads would be approximately 6.8 miles (via New Mill), which would be a slight increase on the proposed route via unclassified roads of approximately 2.1 miles. It should be noted that the £24,000 per year maintenance payments requested by Kirklees Highway Maintenance team for the excess wear and tear on the unclassified rural routes would not be required if the route was solely along A-class roads (Barnsley may have requested a similar amount on top of this for increased maintenance along their unclassified road network along the initially proposed route). The route would need to be amended to show only A-class road use on the approved drawing and route plan for us to accept the proposals.

As mentioned above details should also be provided on trips caused by coal extraction and infill and details of proposed/controlled routes should be provided.

A basic route capacity analysis was carried out by HDM on the alternative A-class road route and DfT surveys indicated that the observed traffic flows were well below the highway link capacity calculated from DMRB figures (TA 79/99 amendment 1) with capacity still remaining after 25 years of growth was added using the TEMPro traffic growth analysis programme and because of this we do not feel that a cumulative impact on the highway link network would be required. This does not cover the capacity analysis of junctions, and a capacity analysis of the A629 Penistone Road/A635 Barnsley Road "Sovereign Junction" was requested and is discussed below.

A capacity assessment was carried out on the junction of A629 Penistone Road/A635 Barnsley Road “Sovereign Junction” using the PICADY junction capacity assessment software, based on a peak hours turning count done on 25<sup>th</sup> April 2024. The assessment was based on the proposed trip distribution on the submitted route scheme and showed that the junction operated within capacity during the highway peak hours. However, we do have some concerns with the model, apart from the geometry which appears to be generous, the traffic flows input into the model don’t appear to represent the supplied traffic count or other recent traffic flows taken at the junction or DfT link flows counted on A635 Barnsley Road to the east of the junction, and as such cannot be accepted. We also have concerns with the accuracy of the traffic count submitted. Due to this we cannot use the supplied model to accurately assess the impacts of the additional development trips on the junction.

We would like to see the traffic count and modelling repeated with the northern junction surveyed and assessed as a crossroads with the entrance to the petrol filling station creating the second minor arm and the southern junction done to show movements across to Holmfirth Road. Traffic queues on each arm should also be taken at 5-minute intervals to obtain an average queue length for model validation purposes. The geometry of the model should be justified with a drawing showing the measurements used and we would recommend that for the southern junction, the minor arm Barnsley Road takes account of the possibility for vehicles to be parked on the forecourt of the PFS when measuring the visibility to the right. The development traffic should also be modelled with the revised a-roads only routing as proposed above and submitted for assessment and approval. The electronic version of the model should be submitted for assessment.

Due to the revised routing proposal being fulling along all purpose A-class roads we would also like to see a similar junction capacity assessment carried out at the A635 Penistone Road/A616 Sheffield Road “New Mill Crossroads” junction. A capacity analysis for this junction was not requested earlier as previously this junction was not on the proposed traffic routing for the quarry.

With this we cannot currently support the application as submitted and therefore wish to object on highways and highway safety grounds, however if the highway concerns raised above were to be suitably addressed then we may be able to re-assess the application.