

RESPONSE TO CHRIS BEMBRIDGE KIRKLEES COUNCIL
CONSULTATION REPORT (Dated 12/09/2024) & PARAGON
HIGHWAYS RESPONSE (Dated 14/01/2025)

Re: 2023/91280 Bromley Farm Quarry
Barnsley Road
Upper Cumberworth
Huddersfield HD8 8PD
February 2025

The purpose of this report is to highlight the inaccuracies and ambiguous statements mentioned by Kirklees Council (KC) in their Consultation Response to Paragon Highways.

From previous correspondence with KC there appeared to be a concern about the experience of the people objecting to the information supplied by KC. For there to be no transparency, the following information and comments is from a person who holds a Certificate of Professional Competence in national road haulage operations and also qualified in Health & Safety. With reference to Road Haulage there were over 15 years working experience as Transport Manager and likewise over 15 years working experience as H&S Manager. The following comments raised are my concerns that KC ignored from previous findings; some of your statements are unreasonable, ambiguous or incorrect. The following comments are listed against the paragraphs in the Consultation Response made by Chris Bembridge of Kirklees Council:-

Highways Develop. Man. Ref: K17-3/6	Comments
Reports – Covering Page	Kirklees Council (KC) responded to Paragon Highways (PH) on the 12th September 2024 and PH response was received by KC on the 14th January 2025 that is over <u>18 weeks</u>. Question: The Community are issued with this report on the 4th February 2025 and informed they have till the 18th February 2025 to respond <u>2 weeks</u>, if this demand is not fulfilled, the case will be closed. Conclusion: There appears to be no lead times for PH to respond, perhaps KC could explain why we have a two week deadline, this is totally unjustifiable.
Paragraph 1	KC states there are bus stops within <u>1km</u> of the centre of the proposed site. Conclusion: Transparent statements from KC, there are two bus stops, either side of the road, within <u>50m</u> of the junction into the refuse tip.

Paragraph 2	A detailed survey was completed by Cumberworth Community in February 2024, the survey covered the proposed hours that the quarry would be in operation, this being weekly from 7am–5pm and 7am–1pm on a Saturday. Our survey indicates daily that AADF of 6233 vehicles with 4.3% of these being HGV's, with the additional 120 proposed movements this would increase to 6.1%. Saturday movements were AADF of 3435 vehicles with 1.4% of these being HGV's; with the additional 72 estimated movements this would increase to 3.4%. Conclusion: Transparent statement by KC, the above survey was conducted at the A635 junction that accesses the refuse tip. This would be far more accurate than DfT traffic count completed in July 2019 at Britannia Crossroads.
Trip Generation Paragraph 3 Paragraph 5	With reference to the 10,000 tonnes of coal that is estimated to be within the site, this implies that it could have an additional impact on the 120 daily movements and KC are still waiting for information to be provided. Conclusion: Inconclusive, when do you expect this information from PH, is it before the 18th February deadline. Type of vehicle to be used, still waiting for confirmation. Conclusion: Transparency, why have KC waited so long for the information with regards to what type of road haulage vehicle they will use, this is a very basic question with a very simple answer. They have had <u>18 weeks</u> to decide and we are being demanded to respond in <u>2 weeks</u>.
Access to the Site Paragraph 1	To suggest that the existing bell mouth access would be acceptable is very misleading; with excess HGV movements no consideration has been taken for pedestrians. Vehicles are mentioned again, what type? there is a big difference between rigid and articulated. There should be no comparison with the past 5 years, this junction will experience a totally new concept with the increase of HGV's either rigid/articulated? so it would be wrong to assume that the junction would operate safely. Conclusion: Have KC satisfied themselves that the kerb radius is now 10m; it would have been more productive if a site visit had been conducted and other issues could have been identified, instead of looking at maps/erial photographs. In practice there are times when it is not correct to compare the last 5 years, in order to justify

Paragraph 1 (Con'td) Access to the Site Paragraph 2	your statement where are the Risk Assessments? The route proposed for the removal of the main mineral would not use this right turn lane in normal use. Conclusion: Transparent statement, yes you are correct, but what you fail to mention the delivery of inert material. The answer to this question will not be known until the quarry is in operation. Inert material is not usually stockpiled and dug as virgin soil.
Paragraph 3 – 5	In these paragraphs KC have highlighted there are <u>highway</u> safety concerns with the current use of the access driveway and with the expected intensification of use we expect that these concerns will increase. Conclusion: Incorrect statement, this road will no longer be a <u>highway</u> because it is will be used in conjunction with the quarry access, 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. KC recommendation of 6m is incorrect and is extremely inaccurate. Again where are the Risk Assessments, this would be a requirement when you using a shared public access to Bromley Farm Household Waste Recycling Centre.
Paragraph 7	The gate relocation to be setback approximately 17m from the edge of the existing shared driveway. Conclusion: KC are assuming there will be only one vehicle waiting to enter the site, from experience this is incorrect, any more than one vehicle would be a risk to people using BFHWR the entrance to the quarry is on a bend, again Risk Assessments required.
Paragraph 8	In this paragraph it has been confirmed by the applicant that 16.5m articulated six axle vehicles as being the type expected to operate at the quarry. Conclusion: Ambiguous statement, in this same report under 'Trip Generation' paragraph 5, the type and size of vehicle to be used was to be confirmed. Now appears we are using a 16.5m articulated vehicle with a pay load of 44 tonnes, which would require a whole new appraisal of the access road as this vehicle will not be able to park in the existing laybys previously mentioned. A rigid and articulated vehicle is completely different in the way they are used.

Transport Route Paragraph 2	The proposed transport route should have not been issued to KC in the first instance, because of statutory HGV laws this route should never have been considered, basic transport knowledge or use of a 'Truck Route Planner'. Conclusion: If the proposed route had been accepted, from Community experience we know these vehicles would have used Carr Hill Road HD8 as a short-cut, as this HGV problem currently exists, but would increase with additional HGV's using the quarry, we welcome the correct route and will be monitoring the situation should they arise.
Paragraph 5	Details to be provided on trips caused by extraction and infill and details of proposed/controlled routes should be provided. Conclusion: It is highly unlikely that you can control infill materials as they will probably be imported within the borough. This is a major concern i.e. schools, villages, unsuitable roads and appears to have been overlooked/ignored by KC.
Paragraphs 6 - 8	The capacity analysis supplied by PH is very impressive all 167 pages. Conclusion: The report is very computer orientated, which makes you concerned on its accuracy, i.e. the daily environment, this is confirmed in the 'Junction Capacity Assessment' in section 4.25 where PH quote 'It should be considered that traffic queues were observed on certain hours, on one day only, which can be unreliable because queue lengths have a large daily variability even with the same levels of traffic demand. The queues shown within the PICADY model are what you would expect to see if you averaged observations from days'. This is unlike the Cumberworth Community manual traffic count which covered all eventualities' including pedestrians, cyclists.

The Consultation Response Report from Kirklees Council is inaccurate and ambiguous and questions are still not answered, the report has no consideration for the safety of school children, pedestrians and cyclists. The use of the tip access road becoming part of the quarry entrance is a high risk, but to-date no Risk Assessments have been produced, I find this very unprofessional.

Informative reports covering the above have been previously submitted, with no response to my questions; it is obvious from reading your reports that Kirklees Council have not acknowledged or not interested

with my comments or concerns, as I am constantly repeating the same questions.

Finally are KC going to be transparent in informing the HD9 community they will be having an additional 60 plus HGV articulated traveling through their village, because to-date it appears they have not.