

**Sent:** Tuesday, June 11, 2024 10:56 AM  
**To:** Victor Grayson <Victor.Grayson@kirklees.gov.uk>

**Subject:** Cliffe Hill Development 62 Houses off Cumberworth Lane - comments regarding the GRM reply to planning committee

Dear Victor,

I have read the reply from GRM dated 31<sup>st</sup> May 2024, regarding the points that were raised at the recent planning committee meeting at the Town Hall.

I have a number of comments/concerns to raise on the GRM reply:

1. Their report refers to “Rogers Geotechnical Services Phase 1 Geo Environmental Report (Ref C2206/22/E/3401 May 2022)” - this Rogers report was submitted as part of the previously rejected planning application – so why is it deemed relative/admissible to this new planning application ?
2. The grouting plan submitted with their report is incorrect and should therefore not be accepted - their drawing shows the 47 house layout as well as the open storage pond and not the 62 houses and below ground surface water storage tank – therefore how can you/Kirklees Planning trust the information submitted by GRM ? Have their grout volumes been based upon this incorrect drawing ?
3. Their reply does not provide any more information and still leaves more questions than answers in terms of volumes to be excavated and numbers of construction lorries that will be required to remove the coal - it is caveated by saying the volumes are likely to change - surely this cannot be accepted by Kirklees Planning as it leaves it open to abuse by the developers allowing them to to open cast mine the entire site ?
4. It doesn't confirm whether the coal is being classified as waste or as a sellable commercial product – why hasn't this been clarified ? How does this fit in with Kirklees Councils policy on Zero Carbon, and greener / cleaner environment for the residents of Denby Dale and surrounding villages. ?

5. Their report indicates that approximately 4400m<sup>3</sup> of coal is anticipated to be extracted / mined via open cast mining techniques, however it follows this by saying this figure is likely to change as works progresses and more information becomes available – what's to stop the developer from extracting/ mining the entire site of approx. 12,000 tonnes of coal ?
6. 4400m<sup>3</sup> of coal to be mined equates to approx. 6200 tonnes of coal to be mined and then removed from site (assuming a conversion factor of 1.4)– based on 20t HGV wagon loads this equates to 310 HGV wagon movements through the villages to get to site and the same number of HGV movements to remove the coal for disposal - that's is 620 HGV's to and from the site for the coal mining alone - on top of that you have the HGV's required for the grouting works.
7. Why haven't the Developers clarified exactly how and where the 6200tonnes of mined coal will be stored on site ?, cleaned and washed on site ? How are the developers going to excavate and safely store the other excavated materials that they need to dig out before removing the coal – these volumes will be in the thousands of tonnes too. Are these non coal soils to be stored on site or removed as contaminated waste and replaced by imported soils ? If removed from site this will increase the HGV traffic even further.
8. They indicate that approx. 1650 tonnes of grout will be required – this will take 83 HGV wagon loads of grout into site based on 20 tonne loads, and a further 83 HGV's to exit the site when emptied = total of 166 HGV wagon movements through our villages and into site, on top of this you have the HGV's required to bring on the 3 x piling rig, grout mixers, 20t excavators , site welfare cabins etc – again they say that this figure is likely to change as works progress and more information becomes available - again this grouting could double in volume - I have grave concerns that the extent of grouting will have dire impact on the natural ground water soakage characteristics of the ground. The developers have offered up no assurances against ground water pathways being impacted / blocked by the extent of the deep below ground grouting . Where will the ground water drain to ? This is highly likely to cause area flooding downstream into the surrounding properties due to the slope of the site.
9. Have the developers reviewed their surface water run off calculations and storm tank volume capacity based upon the majority of the site being grouted and the free draining land being effectively turned into non impermeable land ? – it will effectively act like hard solid ground and absorb very little rainwater . Kirklees Council need to 100% certain that no downstream flooding due to surface water run off will impact any properties/roads downstream or run the risk of court action.
10. Are Kirklees Council willing to accept the increased risk of area flooding caused by the concrete grout curtain being proposed under the majority of this site ?
11. The Developers are not proposing to carry out grouting at the location of the below ground storage tank, why not ? There is a coal mine entry located close to this storage tank as well as above the 6m wide easement strip allowed to the foul sewers to be laid under. If the ground is not stabilised are the developer/ Kirklees Council going to provide indemnities against any ground subsidence that may affect the below ground concrete storage tank or the sewers laid under the easement strip ?
12. The grouting plan only shows minimal grouting under the proposed site access roads (being offered up for adoption) – are Kirklees highways willing to accept this as satisfactory to ensure that the adopted roads and any utilities laid within the adopted roads are guaranteed not to be affected by settlement/subsidence in the future due to the mining works in the area ?
13. Environmental Impacts – there is no details provided regarding noise, dust and vibrations associated with the 500+ 20m deep boreholes and open cast mining operation on the nearby properties and wider residents in Denby Dale and other villages impacted by the 786 HGV wagons needed just for the grouting and open cast coal mining operation
14. There has been no reference that I can find to the developers proposing to carry out pre site surveys on the local residents properties surrounding the site – Please can you confirm that this will be undertaken at the developers expense to ensure that no existing properties are subject to damage/ subsidence caused by the extensive grouting and mining operations. There is mention that pre site condition surveys will be carried out to the highway by the proposed entrance but not residents properties , why not ? do residents not matter ?
15. There appears to be some unexplainable issues going on with the sale of the site – it appeared on Right Move for sale in the past week or two , only to be removed a few days later. The land owner confirmed to local residents that he was unaware of the land being up for sale , are Kirklees Planning aware of this ?
16. Throughout this entire planning application I feel that there have been numerous changes and amendments to layouts, that have been added to planning portal after the period to comment has closed , how many of

these changes have been shared with the Statutory and Non Statutory consultees ? – I get the impression that the open cast coal mining and extensive grouting proposed have not been made clear to the consultees to comment upon.

17. I feel that the application is too vague and lacking detail to be accepted by Kirklees Planning , this is highlighted by the 42 Conditions being proposed.

This planning application needs to be rejected and not rushed through because Kirklees have not met their house building targets

Regards