

Address: 18 Brook Meadows Huddersfield HD8 8GW

### About the application

Application number: 2024/93458	
What is the application for?:	Erection of residential development for 62 dwellings including grouting remedial
Address of the site or building:	land at, Cliff Hill, Denby Dale, Huddersfield, HD8
Postcode:	YO1 0LT

### User comments

Type of comment: An objection	
Do you wish your comments to be published on the website anonymously?	No
How much material would be removed from the site.	
<p>4.2 Applicant's response is 'based on' an assumption, an 'assumed' thickness, an 'assumption' that 30% of the seam has been worked and arrives at an 'approximation' which, according to the applicant, is 'likely to change'. Nevertheless, 4400m<sup>3</sup> of coal is to be mined. This is the same figure as in the previous, rejected, application and equates to approx. 6200 tonnes of coal to be mined and then removed from site.</p> <p>If the applicant's estimates are, as is likely, inaccurate, this figure could be substantially larger. For example, if only 10% of the seam is worked then there will be approximately 6600m<sup>3</sup> of coal or 9300 tonnes and all of the estimates regarding timescales, traffic movements, pollution etc. become unviable.</p> <p>I therefore contend that, as with the previous, refused, application, the following applies:</p> <p>Insufficient information has been provided that the risks arising from land contamination resulting on the site can be adequately mitigated under the proposed land remediation strategy. Likewise insufficient understanding of the residual impacts of the site remediation, inclusive of an incomplete understanding of the site's characterisation, do not provide sufficient comfort to allow the proposed site remediation to be undertaken subject to appropriately worded planning conditions. The current submission therefore incurs unacceptable risks that could cause harm to people and/or the environment contrary to Kirklees Local Plan Policy LP53 as well as National Planning Policy Framework Paragraph 183 (clauses a, b and c). It has not been demonstrated that the proposed development would be environmentally feasible or acceptable nor that the proposal would provide local or national benefits that would outweigh the resultant residual environmental impacts of developing the site for the purposes of winning and working minerals (coal) resulting from the site's remediation. Indeed, the proposed site remediation strategy creates unknown residual environmental impacts that have still not been adequately assessed</p>	

unknown residual environmental impacts that have still not been adequately assessed. There remain significant concerns with the proposed development in respect of the potential for adverse impacts on water resources, human health (noise & air quality in particular) as well as residential amenity more broadly. No overriding community benefits are identified which would make the extraction of coal acceptable from the site. Overall, the proposal is contrary to mineral planning policy with particular regard to Kirklees Local Plan Policies LP36, LP51 and LP52 as well as National Planning Policy Paragraphs 211 (clauses b & c) and 217 (clauses a and b).

How much material would be imported into the site.

Again, this is based on 'approximately', 'anticipated' 'approximate' and is admitted as a figure likely to change. On a site such as this, such a lack of certainty is unacceptable.

How the operations would be carried out.

4.6 No grouting plan has been provided for the proposed layout. The figures and plan submitted relate to a development of 48 houses, previously rejected. The development will be at a substantial risk of subsidence as no grouting is proposed beneath private gardens and shared open spaces, and only some grouting is proposed beneath the development's estate roads. No mitigation for nearby properties is proposed.

4.7 Large tracked rotary rigs as proposed typically operate at noise volumes of 90 - 105 decibels so within 'hazardous' to 'highly hazardous' levels (source 'The Driller' online). The applicant makes no mention of noise mitigation.

4.8 Applicant states (on own estimates) traffic movements of 550 HGVs to remove material. This figure is inaccurate. Based on 20 tonne loads the actual figure, if the lowest estimate of the applicant is used, is around 650. In addition, there will be waste material as well as coal to transport.

4.9 In addition the applicant claims three further HGV movements per day (so six each way) but does not specify a time period for this. Assuming six months of operations, this is around 244 HGVs a month, or 11 per working day. Cumberworth Lane cannot support this amount of extra traffic.

4.10 Officers have advised routing the HGV traffic through the village centre in order to minimise the use of the unsuitable road that is Cumberworth Lane. Applicant suggests 'banksmen or temporary traffic lights' to allow HGVs to turn across a line of traffic. This will effectively block a major route into the village.

How environmental impacts would be mitigated

4.12 There appears to be no Groundworks Management Plan or Construction (Environmental) Management Plan. Thus there are no stated measures to control noise, dust and other pollutants, nor to mitigate environmental impacts such as mud on the highway.

There is no legal agreement in place to underpin Kirklees' requests for support for education, open space, biodiversity loss, sustainable travel etc. The approximations

and assumptions provided by the applicant are an insufficient evidence base on which to base such an agreement.

In addition, the extraction of coal is still proposed, with no evidence (or assessment) of where it will be disposed of once it has been extracted. If it is to be sold for commercial use, the income has not been anywhere included. If it is combusted, this is contrary to Kirklees' environmental policies.

Thus the submission is still contrary to Policies LP11, LP20, LP28, LP30, LP49 and LP63 of the Kirklees Local Plan.