



MATTER 11: MINERALS ALLOCATIONS

Submission by Mrs Jacey Bedford

11b)

OBJECTIONS TO SITE 1965a

I support all the points in Graham Maxwell's submission on behalf of BOLT(ED)

Inclusion of Site ME1965a is inconsistent with Kirklees own policy documents, specifically:

Selecting this site is inconsistent with the National Planning Policy Framework and the Council's own Policy PLP 36

Site ME1965a does not comply with LP policy 36 "Proposal for Mineral Extraction"

The site ME1965a does not meet the requirements of the Kirklees Vision or LP Objectives 1,3,5,6,7,8,and 10

Site ME1965a fails to meet the requirements of the Kirklees Joint Health and Well-being Strategy.

Site ME1965a does not comply with the National Planning Policy Framework paragraphs 1,7,9,10,14,15,17,28,58,61,64,69,73,74,75,70,80,81,86,88,109,110,120,122,123,125,126,131,142,150,151,152,155,157,158 and 163

Site ME1965a fails to meet the requirements of the Kirklees Economic Strategy

LOCATION

Site 1965a when viewed on the map looks to be adjacent to Appleton Quarry's current quarrying operation, however, a site visit will quickly reveal that what counts most here is the topography. The current Appleton Quarry is on the north side of the ridge while site 1965a is on the south side.

While Kirklees Planning Department profess to have visited the site, they have not requested access to any private land (said in their submission before the inspector at the hearing on 10th October 2017) and therefore they have not viewed this site from all angles, in particular the view from the Park Head area of Birdsedge. Residents of Park Head would be looking uphill to the quarry.

RESIDENTIAL AMENITY

The loss of residential amenity should 1965a be included as a Mineral Extraction area on this plan would be devastating for the three houses at Dearne Grange whose frontage is a bare five metres from the site, and also for the 17 houses at Park Head and Park Head Farmyard, Birdsedge which are immediately bordering the site. It is also close enough cause problems to the further 15 houses along Penistone Road, Fairleigh and Sunside, Birdsedge. Quarrying here would cause dust, noise and disruption plus loss of visual amenity.

WATERCOURSES

Site ME1965a borders the headwaters of the River Dearne which not only sustains local nature, but also supplies water to Hinchliffe's Mill at Denby Dale where it is used for dyeing cloth. Hinchliffes is a substantial local employer of over 350 workers. Hinchliffes rely on unpolluted water from the Dearne and also have a licence to take water from a borehole. Should quarrying affect the water table their water supply will also be affected.

Park Dyke, a tributary of the River Dearne rises and runs through the middle of Site 1965a, joining the river before it reaches Hinchliffe's Mill.

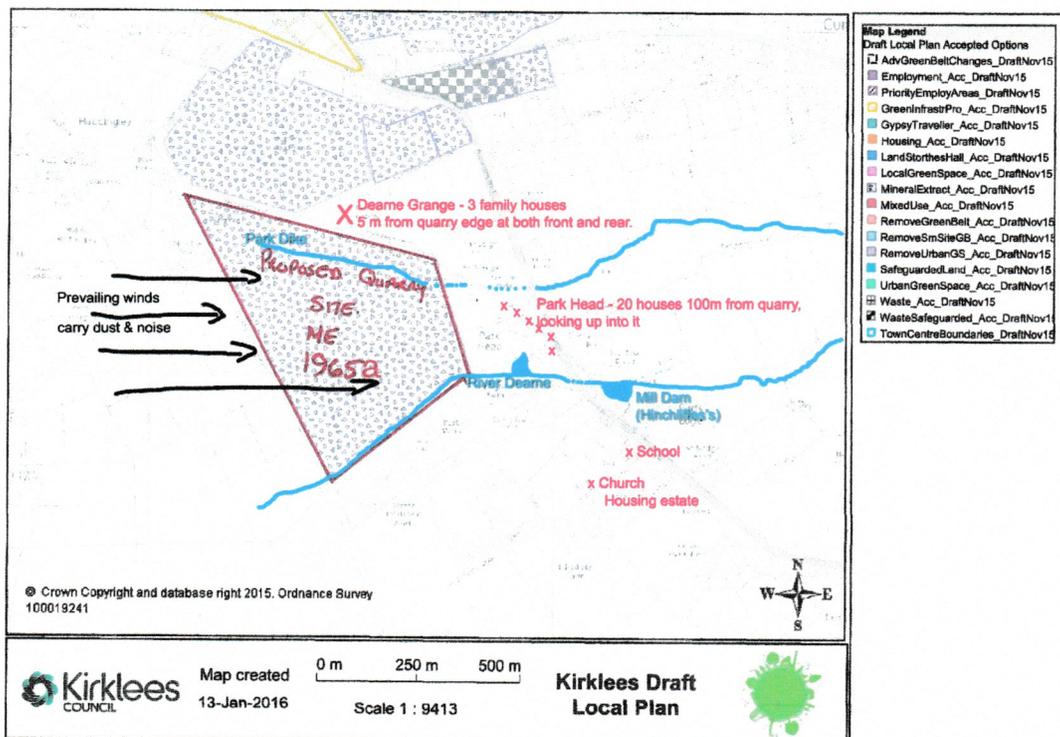
In the 2012 LDP submission prepared by Urban Vision (obtained by Graham Maxwell via a Freedom of Information request) it was recommended that a stand-off of 250m from the River Dearne should be put in place. Given the site ME1965a contains two water courses it could be argued that the same stand-off should apply to Park Dike.

UNDERGROUND RESERVOIR

It has recently come to our attention that Yorkshire Water operates an underground reservoir beneath Rusby Wood on land adjoining site ME1965a. This supplies water to Birdsedge, Denby Dale and Cumberworth plus other local villages. THIS IS NEW INFORMATION AND NOT ON ANY PREVIOUS SUBMISSIONS. Though Yorkshire Water did not put in an objection to the inclusion of Site 1965a, in the event of a planning application for quarrying on that land, Yorkshire Water would require a safe stand-off distance to protect the underground tanks. (Information from Stephanie Walden who leads the Yorkshire Water planning team.)

POLLUTION AND PREVAILING WIND

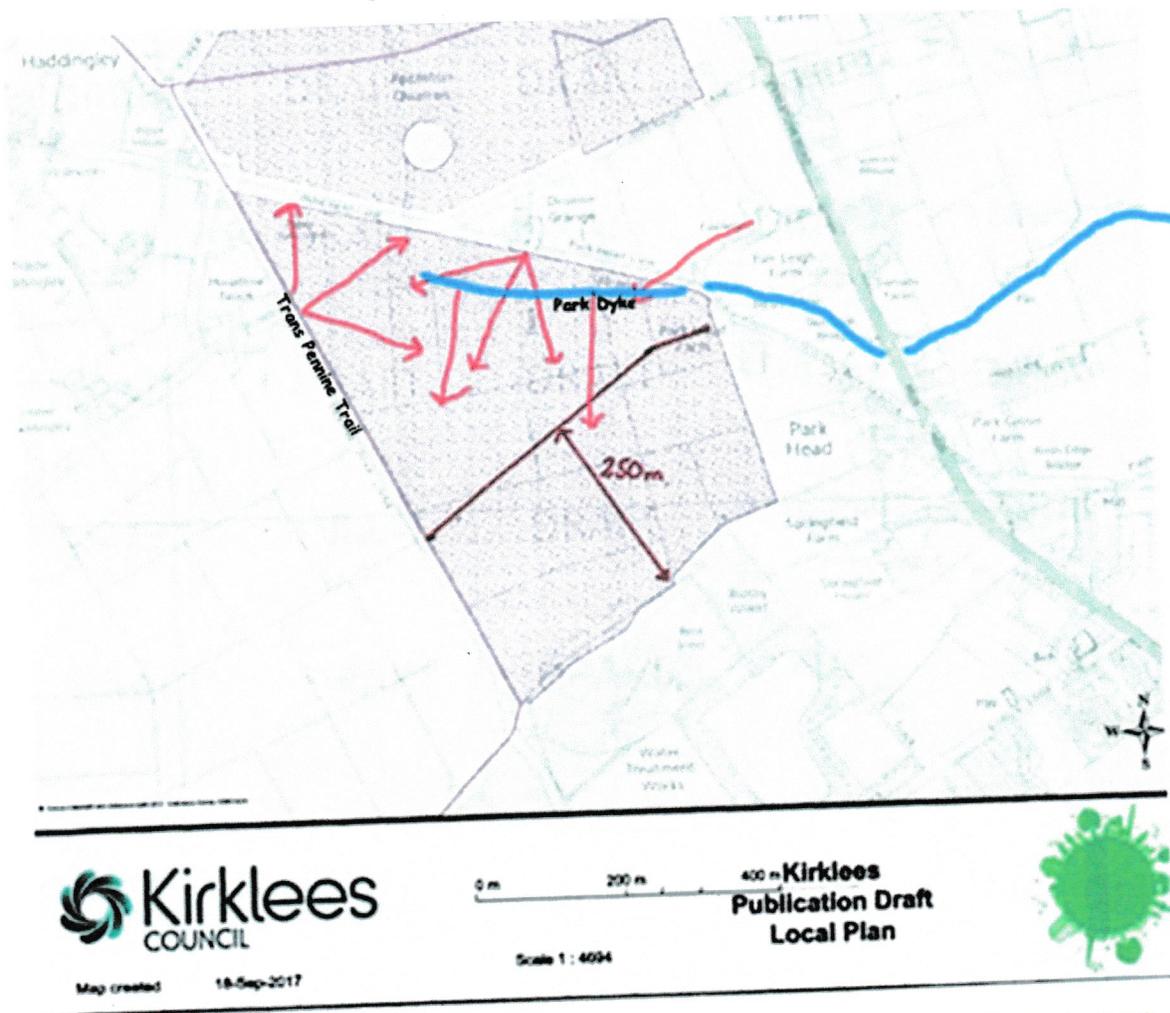
The prevailing wind that crosses site ME1965a is blowing towards the largest group of adjacent houses, with Dearne Grange Houses having a wind blowing towards them 69% of the year and Birds Edge and Park Head having it blowing directly at them for 62% of the year. (Estimated from weather on line).



BUFFER ZONES and SAFE STAND OFF DISTANCES

Including a safe stand off distance from housing which (depending on local authorities) is usually 250 metres to 500 metres, would effectively sterilise site ME1965a because of the proximity to houses on all sides.

In the document LE 100 Identifying Future Mineral Sites a document produced for KMC by Urban Vision p18 para 5.16 states **“Where appropriate the Council may also seek to achieve a buffer zone of 250m from the urban area to protect residents from the noise and dust that can be created through quarrying activities.”**



In document LE 102 Minerals Safeguarded Areas a document produced by Urban Vision for KMC p15 para 5.19 **“For the purposes of this paper it is recommended that the buffer zone for coal and sandstone is 500 metres. The buffer zone for sand and gravel and clay is 250 metres. These distances are accepted as standard by Minerals Planning Authorities based on examples produced in the BGS guidance.”**

Site ME1965a is a proposed sandstone quarry. If best practice is followed and a 500 metre standoff limit applied, most of the site, including the potential entrance from the top of Park Head Lane will be unusable. In fact the only remaining usable land will be a very small patch in the very centre of ME1965a.

KMC in the 2015 plan in policy PLP39 also recognised the need for stand-off distances and recommended 250m for gravel and 500m for sandstone. This proposal was supported by local industry including the promoter of site ME1965a. However this recommended stand-off distance has not been a feature of the current plan, which is worrying in the extreme. Can Kirklees cease to follow Best Practice on a whim because someone has designated a wholly unsuitable piece of land for Mineral Extraction?

The application of buffer zones was not mentioned in the sustainability appraisal

I enclose a rough map showing that the implementation of even 250 metre buffer zones from housing and water courses would effectively render 80% of this potential site as unsuitable for quarrying. If a 500 metre buffer zone was implemented because this is a SANDSTONE quarry, then the whole site will be rendered unusable for mineral extraction.

For this reason alone I propose that Kirklees' plan is unsound while this site remains on it.

ACCESS AND ROAD TRAFFIC USE

The Trans Pennine trail (marked on the map above) runs along the south western boundary of ME1965a. Kirklees appears not to have taken this into consideration at all, but the designation of the trail through beautiful countryside, will obviously be severely affected. The trail will attract walkers, runners, cyclists and horseriders.

The lane is narrow and has no pavement. Quarry traffic will endanger lives.

There is no suitable and safe road access to this site whichever direction traffic comes from. All the roads are narrow and without pavements. Active quarries spawn lots of heavy traffic, lorries being noisier when they are empty than when they are full, so noisier on their return to the quarry. It's common practice to offer drivers a financial incentive for speed, which makes traffic noisier and even more dangerous.

Noise pollution is already a problem for local residents with the existing Appleton Quarry. Large scale quarrying of site ME1965a would make life hell for residents.

INEFFECTIVE MONITORING

Kirklees has a bad track record of failure to impose planning restrictions on the current Appleton Quarry, having failed to prevent working outside the agreed hours of operation (after residents have complained.) There is no reason to suppose that mitigations put in place in order to secure planning permission for quarrying on Site ME1965a would be adhered to or enforced.

11c) What are the cumulative impacts of the proposed allocations with existing operations in particular, in the Cumberworth and Crosland Moor areas?

It only takes a quick glance at the area map to see existing and proposed quarry workings in the area: Appletons Quarry itself (ME2243); the planned extensions to Appletons Quarry (ME2263) (planning permission already granted, extended and extended again); the proposed mineral extraction site at the corner of Cumberworth Road and the A629, previously (confusingly) designated ME1965 and now designated ME1965b; the proposal to include the previously protected area known as Round Wood in the mineral extraction area (ME2263); quarries along both sides of Barnsley Road from the Sovereign stretching down towards Cumberworth (ME2253) and (ME2244). Quarrying for shale between Cumberworth and Denby Dale (an extensive site) (ME2314) and (ME2248). (ME2249) at Kitchenroyd, (ME2264) at Bagden, and (ME2265) and (ME2313) at Denby. Close by at Shelley there are further areas (ME2267), (ME2312), (ME2315) and ME2252 at Hepworth. In view of all this, extending the potential mineral extraction area at (ME1965a) to another 25.31 hectares (bigger than the footprint of Birdsedge Village itself) would be irresponsible and unjustifiable.

During the recent wind turbine fight the Julie Marshall report on the landscape of the area (commissioned by Kirklees) said that the proliferation of wind turbines on this high upland ridge had already reached maximum saturation and no further northward encroachment should be allowed. How can Kirklees then invade that northern end of the ridge with ugly (and unnecessary) quarries?

Mineral extraction policy DLP37 states that proposals to explore for or extract minerals will be permitted provided they will not:

- a. *cause unacceptable detriment to landscape or local visual amenity during or subsequent to extraction;*
- b. *be materially detrimental to interests of nature conservation, cultural heritage, geological or archaeological importance;*
- c. *cause nuisance or materially significant disturbance to local residents as a consequence of the generation of dust, noise or vibration by site operations or associated transport;*
- d. *prejudice highway safety through the volume or nature of vehicle movements generated;*
- e. *result in pollution of water resources or soils or the interruption of land drainage;*
- f. *cause materially significant permanent change to local rights of way networks; or result in permanent loss of best and most versatile agricultural land.*

It is my contention that designating and allowing mineral extraction at the site ME1965a will:

- a) Cause unacceptable detriment to landscape and local visual amenity during and after extraction. Furthermore this detriment is long-term. The current Appleton Quarry has been in operation since the 1890s without restitution of land and ME1965a is larger than the current quarry.
- b) Be materially detrimental to the interests of nature conservation. Frogs, toads, newts and bats inhabit the area
- c) Cause nuisance and materially significant disturbance to local residents as a consequence of the generation of noise and vibration as expressed by the generation of low frequency rumbling which travels through the ground and into the fabric of buildings not attenuated by double glazing and other insulation measures. Also by the generation of dust (wind blown). Also by the addition of heavy traffic on local roads ill-equipped to handle it.
- d) Prejudice highway safety by the increased traffic flow along narrow unclassified roads currently used for leisure purposes by walkers, cyclists, runners, dog-walkers and horse-riders. Any traffic using Birdsedge Lane would seriously endanger children attending the local Birdsedge First School. Traffic accessing the site via the A629 and Cumberworth Lane

would put additional stress on an already dangerous crossroads. (Carr Hill Road and the A629.) The vision at this crossroads is limited and there have been a number of serious traffic accidents over the years.

- e) Result in the pollution or interruption of water courses Park Dyke and the headwaters of the River Dearne as outlined above. The resulting land drainage would be affected. Any pollutants would flow to the lowest point, i.e. the River Dearne and thence to the Upper Dearne Woodlands, currently managed by a woodland trust. In addition water required for processes at Hinchliffe's Mills in Birdsedge and Denby Dale might be seriously affected by pollution of the water.
- f) Finally would result in the loss of 22 hectares of good grazing land currently farmed and used for both cattle and sheep.

In other words, designating this parcel of land for mineral extraction fails Kirklees own mineral policy DLP37 in every significant way.



This google photo shows what the cumulative effect of Kirklees Mineral Extraction proposals could do to this immediate area.