

Regulation 22 Documents

The documents recently submitted by Provectus Remediation Ltd merely rectify some of the many errors, omissions and discrepancies Hilltop Action Group identified in the original submission of October 2014. There have been no material changes to the proposal.

Indeed, most of the concerns and objections raised by Hilltop Action Group and others have been ignored:

- Noise levels will still be above the recommended maximum of background + 10dBA particularly at locations more sensitive than the sample locations chosen by the applicant. There have been no amendments to the original plans to either reduce the noise being generated or to attenuate its effects.
- There are still serious concerns about the health effects of dust. Public Health England state in their letter of 18 June 2015: "*Exposure to PM₁₀ and PM_{2.5} has been shown to have public health impacts.*" and "*The impact from opencasting operations at this specific site is difficult to quantify without more accurate data relating to population exposure duration and levels of PM₁₀ and PM_{2.5}.*"
- Slope stability issues are not adequately dealt with in the application. Specifically there is no consideration of the consequence of breaking into old mine workings or the excessive vibration loading due to heavy traffic on the A61.
- The applicant's statement that: "*The extraction area will be made secure through the use of the existing boundary hedgerows supplemented with noise bunds and perimeter fencing where appropriate.*" is wholly inadequate. The proximity of residential areas and ready access to the site perimeter will entice youngsters to use the site as a playground - the noise bunds will be an attraction rather than a deterrent.
- The location of the water attenuation lagoons is unchanged - in an elevated location on potentially unstable ground immediately adjacent to ancient bell-pits.
- Hydrogeology: The possible hydrogeological impacts have been largely ignored. The effects on Far Tupton Wood are mentioned (as requested in the scoping opinion) and dismissed. Their conclusion that the woods lie on strata below the coal seams, based on a slope of 10-12°, is erroneous. Far Tupton Wood sits on a line of ancient bell pits indicating that it sits on strata ABOVE the coal seams. The trees are therefore at risk from drawdown of groundwater into the excavations. More worryingly, all the residential properties to the east of Far Tupton Woods are at **even greater risk** being nearer to the excavations. Any lowering of groundwater levels brings the likelihood of clay shrinkage and consequent subsidence.

- The new documents still fail to acknowledge the large number of residential properties, schools, nurseries, playgroups, care homes, community facilities and commercial/retail units that will be impacted by the Hilltop proposals.
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Hence, all objections previously submitted by Hilltop Action Group are still relevant.

Hilltop Action Group

e: HilltopActionGroup@gmail.com

w: www.HilltopProject.com