

**Town & Country Planning Act 1990  
Section 78 Appeals**

**Craig Yr Hesg Quarry**

**Summary Evidence of:**

**Katrina Early Hawkins  
Smith Grant LLP**

**AIR QUALITY**

**On behalf of: Hanson UK**

**Planning Inspectorate Reference: APP/L6940/A/20/3265358 (Western Extension Appeal)**

**Planning Inspectorate Reference: APP/L6940/A/21/3282880 (S73 Appeal)**

**Local Authority Reference: 15/0666/10 (Western Extension Appeal)**

**Local Authority Reference: 21/0720/15 (S73 Appeal)**

**May 2022**

## 1. SCOPE AND STRUCTURE OF THE EVIDENCE

- 1.1. My name is Katrina Hawkins. I am currently Chairman of Smith Grant LLP (SGP), an environmental consultancy, having been a Partner of SGP since 2005. I have been in practice as an environmental consultant for over 25 years specialising in air, land and water pollution. I hold a First Class (Hons) degree in Chemistry and a MSc degree in Environmental Pollution Control, am a Chartered Environmentalist, and a Member of the Institute of Air Quality Management, Institute of Environmental Sciences and Institute of Environmental Management and Auditing.
- 1.2. SGP has been involved with the Craig yr Hesg Quarry ('the Site'), the subject of this Appeal, since 2009 as part of the technical team commissioned to prepare and undertake an air quality assessment as part of the EIA and Environmental Statement (ES) submitted in respect of the Environment Act ROMP Review application in 2010. SGP's involvement with the Site has continued since 2009, including with the on-going process of review with respect to PM<sub>10</sub> monitoring carried out both on and off-site.
- 1.3. I have been involved with the Site since 2017 including in respect of the regular review of PM<sub>10</sub> monitoring and undertaking the air quality assessments for the S73 ES and the Western Extension Supplementary ES (WE SES). I have continued involvement up to and including this Planning Inquiry.
- 1.4. The air quality assessment for the Western Extension application primarily considered potential changes in levels of local PM<sub>10</sub> concentrations due to the existing and proposed quarry activities and whether the proposals could influence future compliance with relevant Air Quality Objectives (AQOs) that have been established in relation to the protection of human health. Following consultee responses from the Environmental Health Department, Public Health Wales, the Cwm Taf University Health Board and other parties further information relating to PM<sub>10</sub> was submitted to RCT during the determination of the Western Extension application. On review of these additional submissions the Officer's recommended approval of the proposals subject to the retention of the existing measures taken to manage fugitive dust, and hence also PM<sub>10</sub>, emissions.
- 1.5. Additional information on local PM<sub>10</sub> levels was presented in the WE SES which confirmed that on-going monitoring data continued to indicate the absence of any actual or likely breaches of the relevant AQOs.

- 1.6. Similar information was presented in the S73 ES and the Officer's again recommended approval of the proposals concluding that potential effects of the proposals could be adequately mitigated and managed.
- 1.7. Air quality is not cited as a reason for refusal of the Western Extension planning permission in the decision notice and is not stated as forming part of the Council's case. It is cited as a reason for refusal in the reason for refusal in relation to the S73 planning application, but again is not cited in the Council's Statement of Case. References to air quality and pollution are however made in the third-party representations. My evidence therefore considers potential impacts of aerial emissions that may arise from the proposed activities.
- 1.8. The assessments presented in the WE ES, WE SES and S73 ES, along with the results of on-going PM<sub>10</sub> monitoring, have been used to inform my Proof of Evidence on air quality matters where this relates to established air quality standards. My evidence also considers quarry related traffic movements and potential impacts of associated exhaust emissions. Matters in relation to fugitive dust and potential impacts on amenity are dealt with separately in my proof on 'dust'.
- 1.9. These topics are discussed in the context of the existing baseline conditions and the potential for environmental impacts associated with the two proposals.

## 2. QUARRY ACTIVITY PM<sub>10</sub> EMISSIONS

- 2.1. I have reviewed and presented in my evidence summary information regarding local PM<sub>10</sub> levels and potential contributions from the existing and proposed activities.
- 2.2. In 2009 RCT determined that indicative PM<sub>10</sub> monitoring that had been undertaken at Glyncoch identified a risk of breaching the 24-hour daily mean (short-term) AQO for PM<sub>10</sub>. Further in-depth monitoring was necessary to determine whether declaration of an Air Quality Management Area (AQMA) under their Local Air Quality Management (LAQM) obligations was required. PM<sub>10</sub> monitoring has since been undertaken on and off-site by both the Appellant and RCT and has been subject to regular review and assessment by SGP.
- 2.3. The available data does not indicate any actual or likely breaches of either the long-term annual mean or short-term 24-hour AQOs for PM<sub>10</sub>. On the basis of the results RCT has not progressed to declare an AQMA due to PM<sub>10</sub> concentrations at Glyncoch.
- 2.4. The air quality assessments prepared to accompany the original Western Extension application and subsequent SES considered the possible increases in PM<sub>10</sub> concentrations that may be experienced at receptors from the quarrying activities (compared to a scenario of 'no operations') and the resulting total concentrations. The assessments each concluded there were potential predicted *negligible* impacts from PM<sub>10</sub> for human health at receptors surrounding the proposed extension area and *negligible* to possibly *slight adverse* at receptors near the continuing existing quarry operations and processing plant (when compared to a baseline of 'no operations').
- 2.5. Of note however, the neither the Western Extension or S73 time extension proposals do not include for any increases in throughput at the site. Hence there would not be any expected increases in PM<sub>10</sub> emissions from the processing activities compared to presently. Monitoring carried out at the area within the Glyncoch Estate closest to this part of the site has demonstrated that PM<sub>10</sub> concentrations remain well below both the established short-term and long-term air quality objectives.
- 2.6. This position was agreed by the relevant Officer's in recommending approval for both applications, subject to the imposition of several conditions.
- 2.7. The processing activities would continue to be operated in accordance with the requirements of the Environmental Permit which includes detailed conditions relating to the management and monitoring of dust, and hence PM<sub>10</sub>, emissions. The recommended conditions also included for operation of the wider quarrying activities not controlled under the Permit in accordance with an agreed Dust and Particulate Management Plan and Dust Monitoring Plan (DMMP) to ensure the application of

appropriate control and mitigation measures at the Site. A separate Section 106 agreement was to be entered into to include the payment of a contribution by the Appellant to the setting up of and future air quality monitoring of particulate matter in the local community.

- 2.8. It remains of my opinion that the Appeal proposals would not result in significant adverse impacts on local air quality due to PM<sub>10</sub> emissions, subject to the retention of the existing measures taken to manage fugitive dust and hence also PM<sub>10</sub>, emissions.

### **3. OTHER AERIAL EMISSIONS**

- 3.1. I have also reviewed and presented in my evidence summary information regarding on-road vehicle exhaust emissions. Neither the proposed Western Extension development nor the S73 extension of time proposals would result in any additional HGV movements on the local road network to those currently experienced. In addition, on-going improvements in HGV exhaust emissions would serve to reduce the contribution of site-related traffic emissions to local ambient air pollution. I do not consider the continuation of existing HGV movements on the local road network likely to result in significant adverse impacts.

## 4. MITIGATION

- 4.1. The existing processing and directly associated activities at the site would continue to be operated in accordance with the Environmental Permit issued by RCT. This would continue to require the appropriate management and mitigation of fugitive dust, and hence also PM<sub>10</sub> emissions, from these elements of the site through a range of procedures and physical measures using Best Available Techniques (BAT). Neither the proposed Western Extension development or the S73 development incorporate any changes to the existing processing activities, whether in relation to quantum or method of process, the only proposed change being the relevant extended period of time for operation.
- 4.2. The wider quarrying activities would also continue to be operated in accordance with conditions within the planning permission requiring the appropriate management and mitigation of fugitive dust. These measures would be detailed in an agreed Dust Monitoring and Management Plan (DMMP) for either the Western Extension or S73 development. With respect to the Western Extension proposals this would include measures relating to preparation of the extension area, such as soil stripping and bund creation, as well as for blasting, internal transport, material handling, stockpiling etc. The DMMP would be subject to regular review and agreement with RCT, enabling the updating and / or amending of the DMP in response to any changes in circumstances or opportunities for additional mitigation measures.
- 4.3. Additional mitigation is also to be provided through provision of a scheme of additional planting along the site boundary north of the primary crusher feed hopper.
- 4.4. A separate Section 106 agreement was to be entered into to include the payment of a contribution by the Appellant to the setting up of and future air quality monitoring of particulate matter in the local community.

## 5. CONCLUSIONS

- 5.1. Taking into account the full range of available evidence I conclude that neither the Western Extension Appeal or S73 Appeal would result in significant adverse impacts on local air quality due to PM<sub>10</sub> emissions, subject to the retention of the existing measures taken to manage fugitive dust and hence also PM<sub>10</sub> emissions.
- 5.2. Overall, from my review of the information and results of the assessment, I conclude that, with the incorporation of appropriate mitigation as already employed at the site, the proposed developments comply with the relevant national and local planning policies in relation to air quality.
- 5.3. As such air quality matters would not justify the refusal of the Appeals and I would therefore respectfully request that the Appeals be upheld.