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My Ref/Fy Nghyf:	Your Ref/Eich Cyf	Date/Dyddiad	Please ask for/ Gofynnwch am:
		13th June 2017	Helen Winsall

Mr Graham Jenkins
SLR Consulting Ltd
Fulmar House
Beignon Close
Ocean Way
Cardiff
CF24 5PB

Dear Graham

Planning Application 15/0666/10: Craig yr Hesg Quarry

I refer to the above.

Following consultation with colleagues in our Public Health and Protection, Highways and Countryside Sections, this letter is written as a summary of what I still consider is required in order to take this application to the Development Control Committee.

It is noted that the application places a reliance on active control measures to reduce any impact on the closest parts of the Community to the quarry. Therefore, it is important that we are satisfied as a Council that these impacts can be controlled to an acceptable level prior to the determination of the application.

Below is a summary of information that we still consider is needed to determine this application. Please note that this is the view of Officers only, and is written without prejudice to the decision of the Council on this application.

Blasting

Officers acknowledge the advice given on vibration in Minerals Technical Advice Note 1 and are not looking to deviate from this, nor the air overpressure condition in the current ROMP. However, the expertise is not present within the Council to adequately assess the Blasting chapter of the Environmental Statement and verify that the information given to support the ability to adhere to these limits is sound. Officers consider that it is important to verify this to ensure all parties have confidence in the assessment of the application. **We are therefore at present looking to commission an independent specialist consultant to review the Blasting chapter of the ES prior** to the application going to Committee.

Blasts records provided. No difference to ROMP condition.

Chris Bradshaw
Prif Weithredwr | Chief Executive

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Distances

Officers disagree that the distances marked on the "Block Phasing Plan" between sensitive developments and the quarry are reflective of the separation distances as defined by Minerals Technical Advice Note 1. This is because they are measured from the buildings themselves to the extraction area rather than from the edge of the curtilages to the edge of the operational area of the quarry. It is considered that the distance from the nearest property in Conway Close should be 160 metres and the distance from the school (i.e. edge of the school playing field) should be 154 metres. This obviously brings the school into the 200 metre distance as referred to in Minerals Technical Advice Note 1.

It is considered that **the above "Block Phasing" plan should be amended to reflect distances from the curtilages/ edge of the school playing fields to the edge of the operational area of the quarry**. In addition, it is considered that **the Environmental Statement should be reviewed and it clarified as to whether this has any impacts on the contents of the Environmental Statement.**

Mobile Crushing Equipment

The Environmental Statement does not consider the influence of any mobile crushing or screening within the extension area. It does note that this is a permissible activity and one which could happen, although not currently planned for at this time. It is known that the crushing and screening of won mineral can have an impact upon local air quality, as observed at the fixed primary crushing plant.

It is considered that any mobile crushing intended should be considered in the Environmental Statement. If this does not happen, the intention is to put a condition on any grant of planning permission removing permitted development rights to operate this equipment within the quarry.

Particulate Matter

The application acknowledges the importance of active management of particulate matter emissions from the existing mineral processing areas and within the proposed extension area. It is considered that **a Particulate Management Plan should be adopted** to holistically manage particulate matter emissions from all parts of the development. This plan should take account of the phased nature of the proposed development and be subject to proactive and reactive review. **It is considered that details of this should be submitted prior to the determination of the application.**

In addition, given the acknowledged uncertainty in future particulate matter levels, the variability of prevailing weather conditions, the increased importance of burden

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reduction and the possible need to gather information to address community concerns, it is considered there is an ongoing need to monitor of PM_{10} within the local community. This continued surveillance will impart a cost to the Local Authority. As this cost is in direct consequence of the continued operation of Craig yr Hesg Quarry **it is considered a reasonable and proportionate financial contribution should be made towards any future monitoring arrangements. It is suggested that this figure should be £6,644 in the first year and £4,394 per year thereafter.**

agreed if that absolves them from // monitoring

Vegetation and Dust Control

The application places importance on both existing and proposed vegetation at the site boundaries ameliorating dust within the local community. Therefore confidence is needed prior to the determination of the application that the vegetation will be able to carry out this role throughout the lifetime of the quarry operation.

– no mr dmir

It is considered that in order to provide this confidence a **comprehensive landscaping scheme should be provided for dust management purposes prior to the determination of the application.** This should include the following:

- All existing vegetation that is being relied on for dust management clearly marked on a plan;
- Where new planting is proposed, details of the mix of species, method of planting and the length of time anticipated before the it is expected to be effective in dust management;
- In the period before the vegetation is expected to be effective in dust management, the expected impact of dust and how this will be managed;
- Details of how vegetation will be managed and maintained;
- Where existing vegetation being relied on for dust management is outside your ownership, details of the arrangements that will be in place to ensure its continued management, or when a review of the "Dust Action Plan" (see below) would be triggered if its effectiveness changes.

In addition, **if such vegetation is not as effective as anticipated in controlling dust, there should be a "Dust Action Plan" ready to be put into place, as part of the above Particulate Management Plan. Details of this should again be submitted prior to the determination of the application** and should include a trigger for its implementation, along with the actions that would be taken to ensure some other means of dust control.

Dust Control- General

In addition to the above, and to support the active management of particulate matter emissions and to take account the significant variables identified within the

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application in relation to the possible frequency of dust events, it is considered **there should be a programme of monitoring dust levels at the worse case location(s) associated with the existing mineral processing area and the extension area.** Such monitoring must be in accordance with an agreed method and it is suggested it should be continued throughout the operation of Craig Yr Hesg Quarry. Again, it is considered that a trigger level should be established, which if exceeded would warrant the implementation of an Action Plan (this could be included within the Dust Action Plan above), which would include a review of existing dust control measures. **Again, it is considered that all the above should be submitted prior to the determination of the planning application.**

Operational Noise

As you are aware, a day and night time **noise limit at Cefn Heulog of 42dB$_{LAeq}$ is proposed** in addition to specific day and night noise limits set elsewhere. Furthermore, it is considered that **to reduce the impact of noise associated with the bund construction the permitted hours of these construction works (including preparatory works) should be restricted to the weekday between 10:00 and 16:00 and be carried out in accordance with the specified noise limit stated in existing Condition 20 of the existing consent**.

Communication and Community Engagement Strategy

It is considered that **a Community Engagement Strategy should be produced for future working at the Quarry which addresses the following issues, and your agreement is sought to the principle of this prior to the determination of the application**:

- **Bund Construction and Phased Surface Level Preparation of the Extension Area-** Given the concerns that dust from these operations may generate within the community, it is considered appropriate that a **mechanism should be put in place for the developer to communicate with the community in respect of what works are taking place, when they are due to take place, and the expected impact of the works, prior to undertaking them**;

- **Communication of Blasting Activities;**

- **Community Liaison Group-** The application acknowledges the benefit of sustained meaningful engagement in enabling the operator and the local community to appreciate concerns, further understand any associated risks and to develop mutually agreeable actions. It is therefore considered that **a "community liaison group", should be formed** and maintained throughout the operation of Craig Yr Hesg Quarry.

Chris Bradshaw
Prif Weithredwr | Chief Executive

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Highway Matters

While it is noted that the rate of vehicle movements is not likely to significantly increase, the extension would significantly extend the life of the quarry. The access route from the quarry via the B4273 is considered substandard in terms of structural integrity, geometry footway and carriageway width. This is further exacerbated by on street parking which channels HGV traffic and requires braking and turning movements which adversely affect the structural integrity of the carriageway surface, leading to an increased inspection and maintenance requirement by the Council as Highway Authority. Therefore it is considered that the proposal should make an appropriate financial contribution towards any additional maintenance liability resulting from the heavy goods vehicle movements over this proposed extended period of operation. You are no doubt aware of the suggestions made by Highways Development Control in their comments. **Please would you indicate how you intend to deal with this matter.**

Ecology/ Countryside Management Matters

- **It is considered that a Habitat/ Woodland/ Countryside Management Plan should be submitted to address the issues below prior to the determination of the application:**

- **Management of the surrounding woodland, where it is in Hanson's ownership-** This includes the management of the woodland being offered to Rhondda Cynon Taf, as it is considered that Hanson retaining and managing this would be a more appropriate mitigation option;

- **Grassland mitigation and management-** It is considered that the area lost through the extension to the quarry has enough value to require grassland mitigation/compensation. While an appropriate planting scheme for dust mitigation purposes has to take priority, it is considered this mitigation should take place where land is still available. It is considered that this is most likely to be possible to the south west of the extension, between the extension and Darren Ddu Road;

- **Management of the new path to be created-** This includes how it will remain free of obstruction and how inappropriate access to the Public Right of Way along Darren Ddu Road will be prevented;

- **Management Committee-** It is considered a Management Committee needs to oversee the plan, with an invitation to Rhondda Cynon Taf for membership on that Committee;

- **Restoration of the Quarry-** It is suggested that the details of the planting for

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the restoration should be subject to future review and agreement and that the Management Committee should have a role in agreeing the detailed components of the restoration strategy.

You may also wish to consider putting management arrangements for the new vegetation planting for dust control purposes in this plan.

Please note there are also likely to be **conditions proposed in respect of bat-friendly lighting and a Species, Habitat and Tree Protection Plan for Construction**.

Section 106 Agreement/ Conditions

The mechanisms for securing the above can be discussed. However, I consider it likely that much of the above will need to be secured via a Section 106 Agreement. Please note also that should this proposal be granted planning permission, it is considered likely that the Council would require a Section 106 Agreement to be entered into to rescind the current consents for the site on implementation of the new planning permission, to ensure clarity on the planning status of the site.

Justification

In addition to the above, it w**ould be considered helpful if you could expand on you case for justifying the submission of the application in its current form** as follows:

- Why was Craig yr Hesg chosen for extracting this stone and not elsewhere? It is appreciated that the stone has particularly high skid resistance properties, but why can this stone not be extracted from other quarries?

- Why has the planning application been submitted for the extraction of 10 million tonnes? While it is appreciated that the Regional Technical Statement is a minimum, this is significantly above the amount it suggests Rhondda Cynon Taf needs to supply, and it is considered this should be justified.

- Why will quarry operations be taking place within 200 metres of sensitive developments? It is considered the explanation given for this should be expanded upon given the position in national policy.

- The Environmental Statement mentions alternative solutions have been looked at, but none of these have been provided, nor an explanation of why they have been rejected. It is considered these should be explained in more detail, along with why they have not been pursued.

Not required.

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Conclusion

I would be grateful if you would consider the above, and a meeting to discuss at your earliest convenience would be welcomed. Please note that there may be more queries when further information is submitted. Consideration will also be required as to whether an Addendum Environmental Statement is required.

Yours sincerely,

Helen Winsall
Housing Delivery Team Leader- Regeneration and Planning

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Fydd gohebu yn y Gymraeg ddim yn arwain at oedi / Corresponding in Welsh will not lead to delay

16th August 2017

COPY

Helen Winsall
Principal Planning Officer
Rhondda Cynon Taf
Regeneration and Planning Division
Sardis House
Sardis Road
Pontypridd
CF37 1DU

Our Ref: 407.00027.00385
Your Ref: 15/0666/10

Dear Helen

CRAIG YR HESG QUARRY EXTENSION
RESPONSE TO QUERIES

I refer to your letter dated 13th June and to the subsequent discussion at your Office on 3rd July. As promised I am pleased to respond to the points raised as follows, using the headings set out in your letter. However, by way of introduction, we consider that the majority of the points raised have been addressed in the original submission and subsequent correspondence, and it is thus disappointing that we are returning to issues which we consider have either been addressed or are very much peripheral to the key issues which will affect the determination of the application.

Blasting

The ES concludes that blasting could be undertaken to within 175m of the closest property to the quarry whilst complying with the relevant criteria (ref Chapter 11.0 summary section 11.11, page 201). My e mail dated 9th January provides further comments on the limited number of blast events which would occur within a small zone between 200m and 175 of the closest property.

We welcome the fact that you will be taking further advice on this issue since we are entirely confident as to the ability to adhere to the conventional blast vibration criteria within the distances under consideration. This is further evident from the fact that current blasting operations are taking place at the quarry at distances closer than 200m to residential properties, where the vibration limits are being adhered to.

Distances

The approach to buffer zone distances is set out in para.70 of MTAN1 which defines a buffer zone as a zone within which no new sensitive development or mineral extraction should be approved. '*Sensitive development'* is defined as any building occupied by people on a regular basis, including houses and schools. Para.71 of MTAN1 states that buffer zones should be defined from the outer edge of the area where extraction and processing operations will take place, including site haul roads and I would point out that the strip of land shown on the application plans between the proposed limits of mineral extraction and the inside edge of the screening landform will not be a site haul road, being intended only for

use by light (4 x 4) vehicles. The distances shown on Drawing CYH/E3 are, therefore, correct in identifying the distance between the proposed operational area and sensitive development in the context of the guidance on buffer zones contained in MTAN1.

Para.71 of MTAN1 points to research which indicates that people living close to mineral workings consider dust to be the main impact of mineral extraction and any processing operations, followed by traffic and noise and vibration from blasting. Traffic is not a relevant consideration for neighbours in the vicinity of the quarry extension and blast vibration is dealt with above. With regards to noise the reference above to inhabited buildings is re-enforced by the reference in para 88 to taking noise measurements at a distance from the façade of buildings. The approach of the noise study reflects this, and is identical to the approach taken for the ROMP ES noise study (and indeed all other mineral development noise studies with which I have been involved). There is a separate approach to considering noise levels in external teaching areas at schools, but this is addressed in the ES noise chapter (ref section 10.6). Noise calculations have confirmed that the proposed 45 dB(A) noise limit for the school would be complied with even at the most southerly point of the school grounds.

It is recognised that other guidance in relation to air quality and dust is less specific in terms of distance and measurements to 'receptors', where for example, the IAQM guidance on the 'Assessment of Mineral Dust Impact for Planning' (May 2016, issued post submission of the application), simply makes reference to 'residential properties' and 'schools', which may be interpreted as the curtilages of those properties. However, in terms of distances to residential buildings and curtilages, the differences in the case of the Craig Y Hesg Quarry extension development are not considered to be material to the conclusions reached in relation to air quality and dust. For example, the distance from the closest point of extraction to No. 36 Conway Close is 175m, with a distance of 170m to the property curtilage. Importantly, the circa 5m high screen bund will be in place within that defined distance, which the air quality/dust study concludes will provide a substantial attenuation feature.

The buildings at Cefn Primary School lie at a distance of 243m from the closest point of extraction within the extension area, with a distance of some 165m to the closest point of the external area within the school grounds. However the school would similarly benefit from the attenuation effects of the screening landform and the substantial block of woodland between the extension site boundary and the school (albeit the woodland is not in the control of Hanson). The key issue is the dust control measures which are proposed which will minimise dust impacts on receptors in terms of both buildings and external areas, as discussed further below.

The receptor areas considered in the air quality study are identified on Figure 12.13 of the ES (page 235) with an assessment of the risks of dust set out in tables 12.16 and 12.17. It should be noted that these tables estimate the risks of dust in the absence of mitigation at source. Using the methodology set out in tables 12.4 – 12.6, then, for No 36 Conway Close, the risk of impact is assessed 'moderate' based upon wind frequency, receptor distance (100 – 200m), and with no allowance for any screening. Using a separation distance of 170m rather than 175m would not change the outcome of the assessment of risk. For Cefn Primary School, the risk impact is assessed as 'negligible' based upon wind frequency, a distance of 240m, and full screening (via the existing woodland). If that distance were to be reduced to the school site boundary, then it would be within the 100 – 200m distance (small magnitude) category, and the risk of impact would increase from 'negligible' to "slight". However, it must be emphasised that this is a matrix of the risk of dust impact which simply forms part of the design process: it then needs to be considered in conjunction with the dust control and mitigation measures, including the screening landform, which the ES concludes would satisfactorily minimise potential impacts.

Mobile Crushing Equipment

The ES does not consider the effects of the installation of mobile crushing plant within the extension area since none is proposed. If the Authority were satisfied that there are exceptional circumstances which justify the limitation of permitted development rights for the installation of mobile plant within the extension area then they would be entitled to impose a planning condition to this effect. However, this should not extend to a more general removal of permitted development rights across the quarry and plant site area, noting that such removal of permitted development rights was not deemed to be justified as part of the ROMP review. It was mentioned at our meeting that if they consider it necessary and reasonable, the Authority could impose a condition that no mobile crushing plant shall be positioned within the extension area within 200m of a residential property, noting that if such plant is required it would be sited at a low level within the quarry void. (It should also be noted that there are separate controls already in place on the use of mobile crushing plant within the existing 'installation boundary' via the Environmental Permit (ref conditions 88 – 92 of Permit ref PPC/09-3.5-HQPEL/0104D).

Particulate Matter

At the meeting on the 3rd July we discussed the controls which are exercised via the quarry plant Permit, which regulates emissions from the plant and all related activities, with regular compliance monitoring undertaken by RCT, and with obligations to maintain and where appropriate install additional dust/air quality mitigation measures. With these existing controls in place, our understanding is that for planning purposes the dust management issues are focussed primarily on fugitive dust associated with the quarrying operations which are outside the scope of the controls exercised via the Permit. These issues are considered further below in the context of a proposed Dust Management and Monitoring Plan.

We also discussed the ongoing monitoring of air quality in the context of the November 2014 - November 2015 and November 2015 - November 2016 PM10 Monitoring Reports. These confirm a trend over the last 3 years of good and consistently improving air quality, and which have demonstrated a good correlation with the RCT monitoring station at Garth Avenue. The most recent Report suggests that consideration should be given to the suspension of further monitoring at the quarry to avoid unnecessary duplication.

Notwithstanding these recent air quality monitoring results, it is noted that your letter suggests that there is an ongoing need to monitor PM10 within the local community, and Hanson have been requested to make a financial contribution towards future monitoring to be undertaken by RCT. Hanson are content to agree this approach in principle, and the financial contribution sums quoted, subject to:

(i) The financial contribution to ongoing monitoring to be undertaken by RCT absolving Hanson from a requirement to undertake any separate PM10 monitoring within the quarry;

(ii) The results of the RCT monitoring being made available to Hanson on an annual basis at defined times; and

(iii) An agreement that flexibility is built into the monitoring arrangements to allow for monitoring to be suspended and the financial contribution ended in the event that the ongoing monitoring reveals similar results on a year on year basis with those results confirming acceptable air quality. These matters can be included within a formal legal agreement which can be concluded in advance of the issuing of the planning permission. It is suggested that Heads of Terms of that agreement be

drafted and agreed, and this would be sufficient to then allow the application to proceed to consideration by the Planning Committee.

Vegetation and Dust Control

Contrary to the suggestion in your letter, the application does not place importance on existing and proposed vegetation to ameliorate dust. It may have an incidental attenuation benefit, but the primary dust control will be the physical dust suppression and attenuation measures at the plant site and within the operational area.

Details of tree planting species etc have been provided in the Planning Application Statement and via the response to consultees accompanying my letter of 15th September – see pages 5 and 6 of that response. However, these details are associated with general landscaping proposals rather than dust control.

Notwithstanding this, and in response to a separate issues regarding woodland management, Hanson would be content to prepare and implement a Woodland Management Plan for the quarry as part of wider landscape / ecology measures (discussed below), where the retention and management of the woodland would have incidental dust amelioration benefits.

Dust Control General

Details of the proposed dust control measures are set out in detail in Table 4.1 of the 'Response to Well Being and Environmental Health Issues' Report of June 2016 (ref Site Management Measures and Air Quality controls). The air quality / dust controls reflect the detailed list of dust control mitigation measures set out in condition 30 of the ROMP Review schedule of conditions which were deemed to be adequate to ensure that dust emitted does not become a source of nuisance (ref reason for the condition). A discussed above, you will be aware that there are also detailed mitigation and monitoring controls imposed on the processing plant and related operations via the PPC Permit.

This issue was addressed in the response to consultees accompanying my letter of 15th September (pages 4 and 5), which noted that in the discussions on the ROMP review application, the need for a 'Dust Management Plan' was considered, but RCT concluded that it would be more appropriate to set out specific prescriptive dust control conditions within the schedule of conditions. This in turn was translated into condition 30 which sets out detailed dust control measures. We consider that this approach could appropriately be followed for the extension development.

However, if contrary to this, RCT now consider that a 'Dust Management Plan' should be prepared, Hanson are amenable to this, on the understanding that it would provide the same general details of dust control as set out in the documents referenced above. Hanson are also content to include a commitment to fugitive dust monitoring at the locations studied as part of the ES (ref ES pages 226 – 227), adopting a deposition rate of 200mg/m2/d (ref ES page 208) as a threshold for the reviews of the dust control measures at the site and the implementation of additional controls, if necessary, within an agreed timescale. A Dust Management Plan incorporating these elements is enclosed, the implementation of which could be made the subject of a planning condition. The Plan makes provision for biennial reviews of the Plan, which, inter alia, would consider the merits of and need for ongoing fugitive dust monitoring if no material changes were being recorded.

Operational Noise

The possibility of imposing restrictions on the hours of working for temporary operations is noted, though as agreed at the meeting, the permitted hours would be 0900 hrs. – 1700 hrs. on weekdays, rather than the hours as stated in your letter.

Communication and Engagement Strategy

This topic has been addressed in detail in the 'Response to Well Being and Environmental Health Issues' Report of June 2016 (ref 8.2.5, 8.3.23, 8.9.4 – 8.9.6), which confirms Hanson's commitment to community liaison.

Highway Matters

The issue of a financial contribution towards highway improvements has been addressed in the response to consultees accompanying my letter of 15th September – see page 10. The position of Hanson should be entirely clear from this previous response.

Ecology / Countryside Management Matters

(i) Hanson would be content to prepare a management plan for the woodland around the quarry in their ownership which would relate to (a) the existing woodland shown as areas 'W1' on plan ref CYH / E6; (b) the remnant woodland in Hanson's ownership shown hatched red (assuming that RCT do not wish to accept the offer of the donation of that woodland to their ownership as an extension to the adjoining Craig yr Hesg Local Nature Reserve); and (c) the proposed new woodland planting on the northern screening landform and western screen bund shown as areas B1 and B2 respectively on plan CYH / E6.

In this context, it is noted that condition 42 of the ROMP Review schedule of conditions imposes a requirement to submit a 'Wildlife Protection Plan' covering, inter alia, the protection of existing landscaping, vegetation or woodland areas to be retained. The scheme was duly submitted, but the determination has been held in abeyance pending the determination of the extension /consolidation application. However, given this condition, it is suggested that it would be possible to re-impose a similar condition on the extension / consolidation development which would then apply to the wider area associated with the extension scheme. The details submitted for the Wildlife Protection Plan could then be updated and resubmitted in the form of a Woodland Management/Habitats Protection Plan and, to the extent that it is appropriate, it would consider a wider range of woodland management, wildlife protection and nature conservation issues.

(ii) In terms of the loss of that grassland, we do not accept that it is of such value to require specific grassland mitigation / compensation / management, and this suggestion is not endorsed by the findings of the ES (ref page 117). This issue has already been addressed in the response to consultees accompanying my letter of 15th September – see pages 11-13. It should be noted, however, that whilst there are no short term proposals to compensate for the loss of grassland in the extension area the long term proposals for the restoration of the site do include substantial areas for the natural regeneration of species rich grassland on the quarry floor and benches.

(iii) The new right of way will include a gate at either end to prevent access by motorised vehicles. The path will be a dedicated public footpath which will have

conventional obligations for the landowner to ensure that it is unobstructed, similar to all other PROW.

(iv) There is no necessity for a 'Management Committee'. A Woodland Management / Habitats Protection Plan will be submitted (ref item (i)), which will be considered by the professional officers of RCT as part of their normal duties.

(v) Similarly, there is no necessity for a 'Management Committee' to oversee the restoration scheme. A restoration concept accompanies the application, which reflects the approved restoration concept for the existing site (noting that there is no 'Management Committee' overseeing that scheme). Condition 45 of the ROMP Schedule of conditions requires the submission of a detailed restoration scheme at a defined point, and a similar condition would be equally appropriate for the extension / consolidation development, which, as is the case with a Woodland Management Plan / Habitats Protection Plan, would be considered by the professional officers in the normal way.

Section 106 Agreement / Conditions

The possible need for a Section 106 Agreement has been addressed in my letter of 15th September – see page 14 which noted that all of the issues referred to at that time were capable of being addressed by planning conditions rather than a legal agreement. Following your letter of 13th June, and our discussion on 3rd July, there are now two issues which would need to be addressed via a legal agreement, namely (i) a financial contribution towards the cost of air quality monitoring, and (ii) the relinquishment of the old planning permissions upon implementation of the new extension / consolidation planning permission. In order to make progress, and assuming you are happy for us to do so, we will draft heads of terms for such an Agreement which will be forwarded to you under separate cover.

Justification

(i) Craig yr Hesg Quarry has been chosen for the development because (a) there are no other quarries in RCT producing Pennant Sandstone; (b) the site, as an extension to the quarry, is identified as the only preferred area for quarrying in the adopted LDP; (c) each Authority is required to make a contribution to regional supplies of aggregate; and (d) the infrastructure is already in place at the quarry, with recent very substantial investment in that infrastructure.

(ii) The reserves to be extracted and the context provided by the RTS are set out in section 8.4.1 of the Planning Application Statement. The allocation requirements for primary aggregates in the RTS are based upon circumstances at the end of 2010. Some 5 m tonnes of stone will have been extracted in the intervening period at the 10 year average of 0.69m tonnes per annum noted in the RTS. If this reserve depletion is added to the 'minimum' RTS allocation requirement (4.5m tones) the updated reserve requirement is consistent with the reserves in the extension area. However, the key issue is that the reserve requirement is a minimum.

(iii) The issue of buffer zones and a 200m distance has been addressed in detail in section 8.4.2 of the Planning Application Statement and in my email to you of 9th January 2017.

(iv) Alternatives have been addressed in section 3.9 of the ES, and whatever the circumstances of alternatives these are now of no relevance given that the

Authority need to consider the details of the submitted planning application on their merits.

In the context of the above, and with the Dust Management and Monitoring Plan which accompanies this letter, we do not consider that any further information needs to be submitted prior to the determination of the application, and that the remaining issues as raised in your letter are perfectly capable of being addressed by planning conditions. The Authority has substantial information before them, which we consider is sufficient to allow the Authority to reach a fully informed decision on the application and to progress to a determination. In that context, we do not consider that there are any outstanding issues of such substance that would justify the Authority being minded to refuse the application on the basis of a lack of information or insufficient detail. We therefore look forward to further progress and your confirmation of a potential date for reporting the application to Committee.

Yours Sincerely,
for SLR Consulting

Graham Jenkins
Technical Director

cc Mark Frampton

Hanson UK: Craig yr Hesg Quarry

Dust and Particulate Management Plan and Dust Monitoring Plan

1.0 Introduction

Current Dust Controls

1.1 The management of air quality and dust at Craig Yr Hesg Quarry is currently regulated by:

(i) An Environmental Permitting (England & Wales) Regulations, 2010, Part B permit (the 'Environmental Permit') which regulates the operation of processing plant, roadstone coating plant, stockpiles and related activities within the processing plant site;

(ii) Planning conditions imposed on the planning permission for quarrying, which were updated in April 2013 as part of an Environment Act 1995 'Review of Old Mining Permissions' (ROMP) application, where Condition 30 lists a series of measures designed to minimise dust emissions from the quarrying operation and related transportation on internal quarry site roads.

1.2 The planning application for an extension to Craig yr Hesg Quarry and the consolidation of the existing planning permissions (ref 15/0666/10, submitted in May 2015) anticipated that these established controls would continue in place via (i) the ongoing regulation imposed by the Permit, and (ii) a similar dust control planning condition to the current 'condition 30' which would be imposed on a planning permission for the extension/consolidation development. These controls work in tandem, with the Permit regulating operations within the processing plant site, and the planning condition regulating operations elsewhere within the quarry area.

Response to well-being and environmental health issues

1.3 During the processing of the extension /consolidation application (ref 15/06666/10), the Applicants provided a response to well-being and environmental health issues which had been raised by interested parties, and which had been collated by Rhondda Cynon Taff (RCT) as a 'memorandum of environmental health themes and issues'. These were comprehensively addressed in a June 2016 submission which included a 'schedule of environmental controls and commitments' which listed the management and mitigation measures proposed to regulate dust. The submission also provided information on existing site management controls which are designed to reinforce the mitigation measures through a routine programme of inspection, internal reporting and corrective action where appropriate.

RCT PM10 Particulate Monitoring

1.4 The consideration of air quality/particulate matter has been the subject of ongoing routine monitoring undertaken by RCT at a monitoring location in Garth Avenue in Glyncoch. The results are collated by RCT and are available for review.

Hanson PM10 Particulate Monitoring

1.5 From January 2010, the local air quality management monitoring undertaken by RCT has been supplemented by a parallel air quality/particulate monitoring study undertaken by Hanson at a location on the northern side of the quarry processing plant, between the primary crusher and main haul road and the residential properties in Glyncoch to the north. The Hanson monitoring was initially conceived as an exercise to assess the effectiveness of additional dust suppression measures which were installed at the plant site pursuant to a 'PM10 Emissions Action Plan' submitted to RCT in 2008. This Action Plan proposed a series of dust mitigation measures which were implemented during 2008 and 2009 (ref Appendix 12.1 to the Craig yr Hesg extension/consolidation application Environmental Statement (ES): May 2015, Volume 2 Appendices).

1.5 The voluntary monitoring undertaken by Hanson was subsequently formalised via a requirement imposed by Condition 32 of the Environment Act ROMP schedule of conditions which required Hanson to undertake a 12 month monitoring exercise, with the need for continuing monitoring to be the subject of review following the submission an initial annual report.

1.6 The required report for the period November 2013 – November 2014 was duly submitted, and in the absence of a response from RCT regarding the need or otherwise for continued monitoring, the monitoring has continued, and reports have been submitted for the subsequent periods of November 2014 - November 2015 and November 2015 - November 2016. The reports confirm a good and consistently improving trend in air quality over the last 3 years, and the most recent report dated February 2017, covering the period November 2015 - November 2016 recommended that consideration should be given to the suspension of monitoring by Hanson to avoid duplication with the separate monitoring undertaken by RCT.

Fugitive Nuisance Dust Monitoring

1.7 Fugitive dust monitoring (i.e. more general 'nuisance' dust) was undertaken as part of an Environmental Impact Assessment (EIA) air quality/dust study carried out as part of the 2015 quarry extension/consolidation application. The results were reported in Section 12.5 of the ES (reference tables 12-13 and 12-14 and figure 12.10). With the exception of the dust monitoring station located close the primary crusher haul road, the other stations recorded either low, typically rural background levels, or no evidence of significant dust deposition from the quarry or other sources.

1.8 These issues were further reviewed in Section 8.5 of the Hanson's response to well-being and environmental health issues: June 2016. However, RCT have suggested as part of a response the current application that notwithstanding these results and conclusions, it would be appropriate to undertake fugitive dust monitoring associated with operations within the extension area and any wider operations at the quarry which are not covered by the Environmental Permit, particularly during defined events such as the construction of the perimeter screening bunds.

Dust Management and Monitoring Plan

1.9 In order to draw these issues together, this document comprises a 'Dust and Particulate Management Plan' and a 'Nuisance Dust Monitoring Plan'. It confirms the measures to be adopted to minimise dust emissions, and a nuisance dust monitoring plan which confirms the proposals for the monitoring of fugitive nuisance dust. It should be considered in conjunction with the Environmental Permit, which

will continue to regulate prescribed activities within the processing plant site, and the separate arrangements for the ongoing monitoring of particulate matter (PM10).

1.10 This Dust And Particulate Management Plan and Dust Monitoring Plan, thus focuses on activities which have the potential to give rise to fugitive nuisance dust associated with activities within the proposed extension area (and existing quarry area), and related transportation. It also sets out proposals for the monitoring of fugitive nuisance dust at defined stages which are deemed to represent the highest risk of generating fugitive nuisance dust, primarily associated with the phased stripping of soil and overburden and the construction of the perimeter screen bunds.

2.0 Dust and Particulate Management

2.1 The Environmental Permit

2.1.1 As noted above, the Environmental Permit (reference PPC/09-3.5-HQPEL/0104D, as varied by Notice dated 10th April 2014) sets out detailed measures to regulate and monitor emissions to air from the crushing and screening plant and the roadstone coating plant at the site. In more general terms, the regulated facility is required to operate in such a way that "*all the appropriate preventative measures are taken against air pollution, in particular through the application of the best available techniques.* The Permit also requires that "*no significant air pollution is caused"*

2.1.2 The permit includes 113 conditions which prescribe detailed emission limits and controls, together with requirements to monitor the facility and keep records, as follows:

- Specific emission limits and controls(Conditions 1 – 10);
- The monitoring of emissions and the maintenance of records (conditions 11 – 42);
- The notification to the Regulator of any defined occurrence, (conditions 43-48);
- The operation of defined dust control techniques designed to ensure adherence to prescribed emission limits, including controls on the processing plant in terms of enclosure of plant items and the use of water sprays; controls on the roadstone coating plant; stockpiles; the use of additional water sprays at defined locations; the enclosure of load-out points; and controls on the importation of material for use in the roadstone plant (conditions 49 – 87);
- Controls on the use of any mobile crushing and screening plant (conditions 88 – 92);
- Controls on transport and loading, including the sheeting of vehicles (conditions 93 – 95);
- Control of emissions from chimneys, vents and process exhausts (conditions 96 – 99);

- Control of general operations including dust on internal roads; the hard surfacing of defined roads; the dampening down of other internal roads; and the use of a wheel wash (conditions 100 – 106); and

- General management techniques and controls, including supervision by trained personnel; maintaining plant in good operating condition with a maintenance programme; and the implementation of written procedures to address any non-compliance or complaints (conditions 107 – 113).

2.2 Relationship between Planning and Permit Controls

2.2.1 As itemised above, the Permit is detailed and comprehensive in terms of the controls which it imposes. In the context of these controls, the advice in Minerals Technical Advice Note 1 (MTAN1) paragraph 76 is that whilst planning conditions can control certain activities to protect against dust, care should be taken to avoid duplication of controls within the Permit. In the context of that advice, this Dust and Particulate Management Plan focuses on:

(i) Particulate and dust management controls associated with the quarrying operations and related haulage of stone from the quarry area to the processing plant, where the measures are primarily focussed on nuisance dust but which, through effective control, will also serve to minimise fine particulate emissions;

(ii) The internal management controls which are in place to identify any issues, and, if necessary, implement corrective action.

2.2.2 Condition 30 of the existing schedule of conditions imposed following the Environment Act ROMP Review (ref 08/1380/10, dated 24th April 2013) sets out a list of measures which are designed to minimise dust emissions. This list of dust mitigation measures was reviewed and updated as part of the response to well-being and environmental health issues (June 2016), and the schedule of environmental controls and commitments set out in that document. This in turn is supplemented by the daily and weekly inspection checklists which are in place at the quarry. These elements thus provide the framework for the dust management controls which are proposed in this Plan.

2.3 Proposed Particulate and Dust Management Controls

2.3.1 The following measures are proposed to regulate and minimise fugitive nuisance dust and particulate emissions from the quarry and related haulage operations:

(1) General Management Measures

- **Quality Management System and Environmental Management System** in place at the quarry, the latter accredited to the international standard ISO14001, which includes pro-active management systems to minimise environmental and amenity impacts and which require strict adherence to the terms of the planning permission and Permits.

- **Planning Conditions Monitoring**: there is provision in Regulations for a programme of regular monitoring visits to be undertaken by RCT Officers, at Hanson's cost, to check adherence to requirements of planning conditions.

- **Quarry Plant Environmental Permit Monitoring**: programme of regular monitoring in place by RCT Officers to check adherence to the requirements of the permit and assess the 'risk rating' of the installation.

(2) Site Management Measures

- **Daily visual assessment of emissions,** on an internal Hanson pro-forma (Appendix 1) which includes the dust extractor stack; water sprays; process buildings; conveyors; dust shed; stockpiles; loading; haul roads, wheel wash, and entrance road / exit (including sprays), with a record of any action required, action taken, and date completed, all recorded daily.

- **Daily general site inspection checklist,** again on a Hanson pro-forma (Appendix 2) which includes inspections of haul roads, edge protection, emissions, site security, compliance with internal traffic management, and adherence to vehicle sheeting requirements, with a record of any action required, action taken, and date completed, all recorded daily.

- **Weekly general site inspection checklist,** again on a Hanson pro-forma (Appendix 2) which includes inspections of signs, condition of structures, and cleanliness of site entrance notice board with a record of any action required, action taken, and date completed.

- **Complaints Register:** all complaints are logged, investigated, actioned as appropriate, and the complainant notified of the outcome, with a full written record retained.

(3) Soil Handling

- Soil handling to be undertaken during appropriate weather conditions

- Soil handling particularly in the extension area closest to Conway Close will be suspended when wind conditions are likely to result in dust being carried off site.

- Screening landform to be seeded / planted at the earliest opportunity to bind the surface

- Material to be used to construct screening landform to be conditioned with water to avoid drying out and disturbance by wind

(4) Quarry Operations

- Dry surfaces at highest point of quarry to be treated as necessary with rain gun attached to water bowser.

- Drop heights from excavator to dump truck to be minimised.

- Dump trucks to be evenly loaded to prevent spillage

- All site vehicles to be fitted with upswept exhausts and radiator fan shields.

- Water bowser to be used on stripped surfaces or other areas of bare ground to minimise effects of wind blow
- Drilling of shot holes to be undertaken by drilling rigs fitted with a dust collection system

(5) Haulage

- Main internal haul road from quarry to plant site to be conditioned as necessary by water bowser and / or emplaced fixed water sprays under dry conditions.
- Quarry haul roads to be provided which avoid abrupt changes in horizontal and vertical alignment.
- Regular compaction, grading and maintenance of haul routes
- All haul roads to be conditioned as necessary by water bowser under dry conditions
- Speed limit of 10mph to be enforced.
- An effective wheel wash will be maintained at the site, as required by Condition 15 of Planning Permission Ref. 13/1039/10, dated 14th March 2015 for improvements to the quarry entrance/ exit road. Details of a 'bath' type wheel wash were approved by the LPA in June 2014, but that wheel wash is to be replaced by a superior hydraulic wheel wash in August 2017. All HGV traffic exiting the site will be required to first pass through the wheel wash to ensure that no much or detritus is tracked out onto the public highway.

3.0 Fugitive/Nuisance Dust Monitoring

3.1 The main potential for fugitive nuisance dust during quarrying operations would be during soil stripping within the three defined phases of the extension development, and during the construction of the perimeter screen bunds during the first of those three phases. The construction of the screen bunds would be undertaken as a 'temporary operation' over a period of no more than 8 weeks in a single calendar year (as required to adhere to the noise limits which have been proposed for such temporary operations).

3.2 Given that this is the identified key source of potential nuisance dust, it is proposed to monitor fugitive dust at three locations in the vicinity of the extension development / screen bund, as shown on Location Plan DMP1. Location 1 is at the rear of Conway Close and is representative of the closest properties to the extension area and the proposed site for the construction of the screen bunds. Location 2 is to the north of the extension area, close to the properties at Cefn Heulog. Location 3 is to the south west of the quarry extension area and will be used to establish background dust deposition levels. Locations 1 and 3 correspond with locations 4 and 3 respectively on ES figure 12.10 where monitoring was carried out as part of the EIA undertaken in support of the extension/consolidation application and benefit from baseline monitoring data captured in advance of the commencement of the extension development.

3.3 The monitoring would be undertaken using combined Frisbee deposit and adhesive strip dust gauges to measure total daily dust deposition and directional dust, consistent with the approach undertaken as part of the EIA dust/air quality study. Monitoring would be undertaken as follows, with dust samples collected at monthly intervals and sent for laboratory analysis:

(i) For a three month period immediately preceding the commencement of soil and overburden stripping in phases 1, 2 and 3;

(ii) For a twelve month period following the commencement of soil stripping within Phase 1 to cover the duration of the period of construction of the northern and western screening bunds, and the initial operational phase of development within the extension area;

(iii) For the duration of soil stripping operations within phases 2 and 3; and

(iv) At such other times and at such other locations as may be requested by the LPA (acting reasonably), for example in response to the receipt of complaints about nuisance dust from the site.

3.4 The results of the monitoring referred to in paragraph 3.3 above will be submitted to RCT as 'dust sample test reports' which will include the test result data and explanatory comments as appropriate. The test reports will cover sequential periods not exceeding 3 months in duration.

3.5 The monitoring will use a dust deposition rate of 200mg/m²/d as an indicative threshold for possible nuisance. In the event that a dust sample test report indicates a dust deposition rate (averaged over the one month sampling period) at or in excess of that threshold, then this will trigger an investigation of the cause, using site records and data from the quarry weather station, with RCT being notified within a one month period of the outcome of the investigation and any new or additional mitigation measures to be taken. However, it is anticipated that any significant dust event would be identified via the routine daily visual assessments set out in section 2.3.1 (2) above, with the corrective action referred to. The dust monitoring results will be used to identify any increase or trend in dust deposition rates, verify (or otherwise) any complaints from neighbours, and provide a further basis for future remedial action / mitigation measures.

3.6 An automatic weather monitoring station will be maintained at the primary crusher, in a manner to ensure the accurate measurement of atmospheric temperature, wind direction, wind speed and precipitation, as is required by ROMP condition 33.

4.0 Particulate Matter Monitoring

4.1 It is the intention of RCT to continue their existing programme of air quality (PM10) monitoring via the station at Garth Avenue. In order to avoid duplication of monitoring, Hanson has agreed to make a contribution towards the cost of the ongoing monitoring, subject to them being absolved from the requirement to undertake any separate PM10 monitoring within the quarry and also to a number of qualifications relating to the review of the necessity for ongoing monitoring depending on the reported annual results.

4.2 These issues are to be incorporated into a formal legal agreement, where the air quality monitoring by RCT would then be undertaken in parallel with the particulate

and dust management and fugitive nuisance dust monitoring proposals set out in this Plan.

5.0 Review of Particulate and Dust Management Plan and Fugitive Dust Monitoring

5.1 It is intended that this Plan should be a 'living document' which can respond to any issues which arise during the development, and which is capable of being updated and/or amended by agreement between the operator and the LPA in response to any changes in circumstances or opportunities for additional air quality / dust mitigation measures.

5.2 It is thus proposed that the Plan should be the subject of a formal review every two years from the date of the planning permission. This review would take the form of:

(i) An initial exchange of correspondence followed, if necessary (at RCT's discretion) by a meeting between the operator and representatives of RCT's Environmental Health Department in advance of the review date to assess the performance of the Plan over the preceding two year period;

(ii) The identification of anticipated quarry development works over the forthcoming two year period, with particular reference to any soil stripping or handling during the period;

(iii) The identification of any changes which should appropriately be made to the Plan;

(iv) The submission of an updated Plan for approval by RCT, or confirmation that no changes need to be made, as appropriate; and

(v) The implementation of the updated Plan in the event that updates are deemed to be required and are submitted and approved.

Cefn

LOCATION 2

LOCATION 1

Conway Close

Orchard Drive

Pearson Crescent

Darren Ddu Road

LOCATION 3

N

0 80m 200

Metres 1:2500

NOTES

BASE PLAN SUPPLIED BY WYG APPLICATION SITE PLAN, CYH E2A

LEGEND

- APPLICATION SITE BOUNDARY
- HANSON UK OWNERSHIP BOUNDARY
- PROPOSED EXTRACTION AREA
- LOCATION 1 — DUST MONITORING LOCATIONS 1 - 3

Hanson

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WESTERN EXTENSION

PLANNING APPLICATION

PROPSOED DUST MONITORING LOCATIONS

DMP1

Scale 1:2500 @A3

Date AUGUST 2017

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