CON520: SUBMISSION ON
RESOURCE CONSENT APPLICATION
(SECTION 96 RESOURCE MANAGEMENT ACT 1991)

TO:  Consents Hearings
      Environment Canterbury
      P O Box 345
      CHRISTCHURCH 8140

      Email: hearings@ecan.govt.nz
      Ph: (03) 353 9007   Fax: (03) 365 3194

OR:  submit by completing an on-line form at:

       Date: 5.00pm Thursday 6 June 2019

Person(s) /Group /Organisation Making the Submission

Full Name of Submitter(s):  Kerry Horrell

Postal Address:  

Contact Phone:  

Fax/Email:  

☐ Please tick this box if you do not want to receive any communication via email

Contact Person:  

Name of applicant:  Fulton Hogan Limited

Applications to Environment Canterbury

☐ All of the applications as listed below OR only those as ticked.

☐ CRC192408  Land use to excavate material
☐ CRC192409  Land use to deposit cleanfill
☐ CRC192410  Discharge contaminants into air
☐ CRC192411  Discharge contaminants into water from industrial processes
☐ CRC192412  Discharge stormwater into land
☐ CRC192413  Discharge contaminants into land associated with deposition of cleanfill
☐ CRC192414  Water permit

☐ I / We support the application  ☐ I / We oppose the application  ☐ I / We are neutral to the application (neither support or oppose)

☐ I / We do wish to be heard in support of my/our submission*
       (Note: this means you wish to speak in support of your submission at the hearing)

*If others make a similar submission, I will consider presenting a joint case with them at the hearing ~ ☐ Yes ☐ No

☐ OR

☐ I / We do not wish to be heard in support of my/our submission
       (Note: This means that you cannot speak at the hearing, however you will retain your right to appeal any decision to the
       Environment Court on any decision made by the Council.)
Application to Selwyn District Council

RC185627  Land use for gravel extraction and processes

☐ I / We support the application  ☑  I / We oppose the application  ☐ I / We are neutral to the application
(neither support or oppose)

I / We do wish to be heard in support of my/our submission*
(Note: this means you wish to speak in support of your submission at the hearing)
*If others make a similar submission, I will consider presenting a joint case with them at the hearing  ☑ Yes
☐ No

OR

☑ I / We do not wish to be heard in support of my/our submission
(Note: this means that you cannot speak at the hearing, however you will retain your right to appeal any decision to
the Environment Court on any decision made by the Council.)

The reasons for making my submission are: (state in summary the nature of your submission, giving reasons)

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Please attach additional pages if required

3.

I wish the consent authority to make the following decision: (give details, including the general nature of any conditions
sought)

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5. □ I/we am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991. 
I /we am / am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Signature of submitter or duly authorised agent on behalf of submitter

Date 3/6/19

Notes to the submitter:
1. The person making this submission must send a copy to the applicant as soon as reasonably practicable after serving Environment Canterbury.
2. A list of all submissions received will be provided to the applicant.
3. Please be aware that third parties may request a copy of submissions received and that request is subject to the Local Government Official Information and Meetings Act 1987.

The address for service of the applicant is:
Fulton Hogan Limited
c/o Golder Associates
PO Box 2281
Christchurch 8041
Attn: Kevin Bligh / Geoff England

Email: submissions@golder.co.nz
2. We have lived in the Weedons/West Melton area for over 42 years. 20 years on Jones Road (the first house south of Royden Lodge/Proosed Quarry Site). We bought a life style block in both locations for the fresh air, closeness to town, rural atmosphere, great safe place to bring up children, less traffic than town and less noise and to farm sheep and deer. We were and are still surrounded by agriculture activity - sheep, deer, horses, poultry, pig farming, flower growing, tree and plant nursery and vegetable growers. Is quarrying an agricultural activity, NO it’s a mining activity. It will impact on our lives, health and property values.

TRANSPORT Extra quarry trucks will have a huge impact on our already dangerous roads. Trucks pulling out on the West Coast Road slow huge lines of traffic which happens to me every week day, the trucks have created many stone chips on my car going either way and people, because annoyed, take risks trying to pass them rather than slow down to their speed. The traffic around Jones, Curraghs and Dawsons Road have increased ten fold since we moved to the area and will continue with the growth rate in the surrounding district. Large quarry trucks are the last thing we need on an already overloaded system and so close to such large built up areas.

WATER - concern for long term health issues which exist already from the West Coast Road Quarry. Contamination of ground water quality and quantity. Effects on ground water, new permits, changing existing permits, wells and water races.

DUST – Huge concern for people, animals and agriculture. So many living so close. We collect rain water from our roof and spend a lot of time out doors, this will make our outdoor environment unpleasant. Visibility will effect the immediate vicinity especially in the strong Canterbury winds.

HEALTH – the stress and mental health issues from this planned quarry has and will cause damage. The peace and quiet of our area will be filled with machinery noise, dust, vibration and visual eye sores. We have Izone in our district we don’t need a working quarry in between Templeton and Rolleston.
I ask that the application be refused, however, should consent be granted, I respectfully request these conditions be considered.

- I ask that there be a minimum set back distance of 500 metres measured from any part of the quarry boundary to any residential property boundary.

- Where the applicant is looking to use a mobile processing plant, it is obvious any set back they propose will be changeable and therefore inappropriate. To ensure certainty, only fixed points should be considered when stipulating a setback, as they will be measurable / defined at all times.

- A bond of $700,000 to be paid, refundable at the conclusion of operations in the case of no consent breaches, and good behaviour by the applicant throughout the entire duration of the consent. This bond can be used to prosecute or sanction the applicant, in the case of serious consent breaches, or repeated breaches.

Reason: Councils do not have the financial means to fight any court challenge, should a penalty be applied. This gives all the power to the applicant, and should not be acceptable. It is inconceivable for there to be no penalties, due to the fear of being taken to court by an organisation that has no financial constraints.

- The site / quarry manager's report / record of complaints to be inspected on a quarterly basis by an independently appointed inspectorate. The funding for aspects involved in the inspection to be provided by Fulton Hogan. To be classed as independent, it must be proved they have no prior links to the quarry industry, nor have been used previously by ECAN. The appointed body to be agreed by SDC, Fulton Hogan and the Body representing the Templeton Community. This is to be separate to any inspection conducted by SDC.

Reason: An independent, quarterly audit is something Fulton Hogan has agreed to at another of their quarry sites, with a provision of a compliance report, and is therefore not above and beyond what would be deemed acceptable. Such inspections will encourage compliance at all times. It is important that breaches are recorded, investigated and dealt with robustly.

- No removal of aggregate lower than 3 metres from the highest recorded water level or excavating below this line.

- A member from the Body representing the Templeton Community, or nominee on their behalf be allowed as one of the attending party to the site inspection as outlined in above.
Reason: To demonstrate full transparency in the process, and to prove that the inspection is robust and consistent across visits.

- A copy of the inspection report in full along with recommendations and findings to be made available for anyone to view from the Templeton, Selwyn and Weedons area.

Reason: So that all residents are aware of any issues arising and the outcome of the inspections. To maintain the issue of full transparency by Fulton Hogan.

- An aerial photograph to be taken of the site at each inspection phase. This too is to be made available along with the report mentioned above. Images taken to clearly indicate depth data.

Reason: To show that the water table has not been exposed at any part of the site being quarried, and that excavation depths are compliant at all times.

- 2 of the quarterly inspections, in any calendar year to be 'spot visit' inspections, with no notification given to Fulton Hogan in advance.

Reason: Food establishments do not have pre-warning when they are going to be subject to a health inspection - for obvious reasons. Spot check visits will show any issues of non-compliance during day to day operations within the quarry.

- Well/bore readings to be taken every month between December - July (inclusive), and every two weeks between August and November (inclusive) with recordings shown on the CRC well database, where again there can be full transparency. FOR THE DURATION OF THE CONSENT. These are to include both water levels and other relevant data Manual readings to be taken by an independent source, funded by Fulton Hogan and NOT be taken by anyone from ECAN.

Reason: To ensure the integrity and reliability of readings. In addition, water levels can rise substantially in short periods of time, and those rises may be significant taking into account the CPWS. Less frequent recording could lead to quarrying occurring below the stated levels permitted. Self monitoring is open to abuse or negligent practise. Wells on site need to be read by an independent source accordingly.

- No quarry truck traffic to be allowed to use Jones Road / Railway Terrace AT ANY TIME - IN EITHER DIRECTION. Queued traffic is not a reason to allow this condition to be waived. If there is requirement to deliver aggregate to an address within Templeton, this is to be notified to the Body representing the Templeton Community, with full details of duration, route and number of trucks anticipated. Addresses "within the vicinity" of Templeton still require trucks to use alternative routes.

Reason: Township is not suited to such heavy and regular traffic as outlined in my submission.

Any dust bought out of the quarry on trucks will eventually accumulate along this residential road and will pose a health hazard accordingly.
Immediate vicinity does not necessitate this route being used and will be open to interpretation / misuse.

- All trucks / trailers carrying any load to be covered AT ALL TIMES. No truck is to carry any load leaving or entering the quarry until such time a cover is fitted. All trucks to drive through a wheel wash before leaving the quarry.

Reason: The get out clause of 'where possible', applied at other hearings has been abused. In addition trucks are often loaded where covers clearly available are not used. There will be initial costs incurred, but the covers would be useable for the life time of the trailer. The applicant cannot prioritise the threat to profit margins above the risks to communities and commuters.

Covers would: a) prevent any discharge to air of dust particles (of any size) whilst in transit. b) ensure trucks are loaded correctly and legally at all times c) significantly reduce discharge of stone matter from the truck bed which creates a hazard for other road users - that hazard being significant on SH1 where vehicles are travelling at speed. With 1500 trucks a day operating, risks increase accordingly.

- Every truck leaving the quarry to pass through an appropriate spray of water immediately prior to leaving the quarry boundary unless there is heavy rain at the time, negating this requirement.

Reason: To minimise the amount of dust being taken outside of the quarry by dirty or dust-laden trucks.

- Dust to be dampened down by a spray/mist fog system around the operating areas of the quarry, and any perimeter close to current operations. This to be in operation 24/7 whenever wind is detected - at any speed. Water cart use is not to be primary form of mitigation.

Reason: Water carts are totally ineffective for a large scale quarry operation, particularly in hot and dry conditions through summer. Dust can still be swirled up at any time in windy conditions and the wind is not going to be confined to quarry operating hours. Therefore the dust is to be kept damp at all times, so as to prevent, if not reduce - dust from leaving the quarry both during the hours of operation and also when it is not in operation.

NOTE: If the amount of water consented for use at the site is not enough to facilitate this mitigation, AT ALL TIMES consent should not be granted. If suitable water mitigation cannot be used for any reason, quarry operations to cease until such time they can be operational.

(The consent issued for use of water from well M36/0257 can be found in the folder alongside well data).

- Strict hours of operation to be applied, whereby there is no quarry activity of any kind (including truck movements) on any weekend (Saturday/Sunday) or public holiday. If the quarry is consented to operate on a Saturday, can this be restricted to between the times of 10am and 3pm.

Reason: The residents of Templeton should be entitled to some periods of peace and quiet, where they can enjoy the weekends without the stress of noise, traffic and dust. Early hours
operating on a Saturday is unacceptable. There should not be any provisions whereby Fulton Hogan can operate at these 'quiet' times other than in the case of an emergency. If there is very little by way of regular traffic noise during the night, noise from quarry operations will be acutely perceived.

- Weekday times of operating to be between 7am and 6pm only. No truck movement to be undertaken before 7.00am. No night time operations or deliveries unless specific evidence of requirement to do so. (Maximum 90 nights per year).

Reason: Residents have the right to quality and quiet at night time. Children should not have sleep patterns disrupted which could be of detriment to health or schooling. No movements before 7am is agreed as a condition at another of their quarries, so could apply here. The applicant has not provided evidence of the need to undertake evening / night time deliveries. They have been given the contract for the Riccarton Road upgrade, with work due to be complete by December 2020. They do not anticipate beginning operations at the site until 2020, so there is no requirement for them to be granted night time operating. If at any time in the future it becomes a necessity, they are to provide evidence and apply for a variation - for that time period only. A blanket consent should not be considered for "what might be...."

- Any infill material used or stored at the quarry must only contain component material stipulated / itemised in the consent. The proviso made by the applicant of "Any material not specified in either acceptable or unacceptable materials must demonstrate that it is not leachable, degradable, putrescible, combustible, hazardous, liquid or unsafe if excavated to be accepted for deposit." should not be applied as it is open to interpretation. A definitive checklist is to be applied accordingly.

Reason: To prevent potential contamination when used as infill. By following clearly stipulated criteria, there will be a drastically reduced risk of inappropriate material being classed as 'clean fill'. In addition it assists any site inspection, as it will be clear to all involved what should be present, and what should not be present. There should be no ambiguity. Any contaminant illegally used may not come into play for several years, pending changes to the land or water level, as shown recently in Christchurch.

- Samples to be taken from any level of the infill material at each inspection requested in No. 2 above, and analysed accordingly. Anything found that is NOT included in the acceptable material list on the consent to be treated as a breach of the said consent condition. There should not be reliance on just a visual surface inspection.

Reason: To ensure compliance is adhered to 100% of the time.

- Each lorry load of infill has to have a clear and robust paper trail. That paper trail to be recorded in a way whereby it can be accessed by anyone involved in the site inspections - including the attendee on behalf of the Body representing the Templeton Community.
Reason: To show full transparency in this process. To ensure nothing other than the stipulated material is accepted and stored/used. The recorded and documented information should therefore match anything that has been sampled and tested.

- All quarry activities (other than forms of water mitigation) to cease immediately when wind gusts exceed 7 metres per second during two consecutive ten minute periods during dry weather conditions such that dust is being lifted from the site. To recommence when wind gusts are less than 7 metres per second during the previous two consecutive ten minute periods. If the quarry continues to operate, this is to be deemed as a breach of the said consent condition, and is reportable accordingly. In this circumstance, gates are to be closed with no truck movement leaving the quarry.

Reason: To reduce the amount of dust being dispersed due to the high winds, and in turn reduce the level of dust being dispersed beyond the quarry boundaries. The proposed measurements of average hourly by the applicant are inadequate, as they will not be taking into account significantly high speeds when wind is gusting. The proposed criteria has been applied at other hearings, and can therefore be considered valid for this hearing.

- Any application by Fulton Hogan for variations or changes to any consent granted to be fully notified.

Reason: To ensure that residents and other affected entities are not ambushed with changes being made without their knowledge or input. This is something they have agreed to at another of their quarry sites and is therefore an acceptable request.

- Daily truck movements to not exceed the 1,000 on any weekday in any circumstances other than where emergency is declared, whereby trucks from the quarry are utilised in the management of the said emergency. This is less than the 1,500 requested in the application.

Reason: The roads in this area are unsuited to such heavy/regular/sized traffic. Even with 1,000 this still equates to 6,000 vehicle movements a day over and above that which is already experienced.

- No truck movements on the roads after 6pm during the operating hours of the quarry between Monday and Friday.

Reason: To allow residents unhindered / quality use of the roads in the evenings.

- Noise levels relating to mineral extraction activities are to be measured from the quarry boundary to the nearest property boundary on each side of the quarry. The noise is not to exceed 55dB at any time during the agreed hours of operation at this measurement point.

Reason: To allow those living in the vicinity the opportunity to have some semblance of enjoyment of any part of their property, not just their dwelling - at all times.
- Fulton Hogan to prepare and present a detailed plan of rehabilitation for the site in question, before consent is granted. This to be agreed as part of any consent granted. If there are changes to this plan after quarrying has been initiated, this has to be requested as a variation to the condition, with full notification being made accordingly. (Please see 19)

Reason: Everyone should be aware of what is to happen to the site once quarrying has ceased. If the applicant needs to make genuine changes, for genuine reasons, it should be possible for the community to be made aware of the proposals, and have an input.

- Any sensors around the quarry mandated by ECAN, to be measured to 500m from the nearest property boundary on each edge - NOT nearest dwelling. Regardless of most common wind direction or compass direction.

Reason: Every resident in the immediate vicinity of the quarry should have the right to enjoy all areas of their property, including all areas of their land, not just dwelling.

- Sensors MUST be installed around the quarry boundary, as initially mandated by ECAN. Funding for all aspects of the monitoring to be undertaken by Fulton Hogan. The monitors to be supplied, calibrated and maintained by a fully independent source with no links to either quarry operators, bodies representing quarries nor ECAN. The monitors to be included in the issue of site inspections requested in No.2 from this section.

Reason: To ensure the process is transparent with a reduced chance of the policy being compromised. (ECAN TO CONFIRM THEY ARE STANDING BY THIS POLICY AND WILL BE ADOPTING IT FULLY). Self monitoring cannot be considered as acceptable, due to the possibility of it being open to misuse or manipulation.

- Fulton Hogan be prohibited from applying for changes, amendments or additions to any consent granted, for a period of 8 years. After that period of time, should Fulton Hogan apply for any changes they are to be fully notified each time they are applied for. (Only exception being No.14, where proof is also to be provided to the Body representing the Templeton Community).

Reason: It prevents the applicant from holding back on key issues, or applying for less than what they actually want, which they then try to have consented outside of the main consent hearing, a year or two later. These have historically been signed off as non-notified and are in effect, adopted by stealth. Residents and communities have no recourse and are not aware of the application until such time it has been consented. This tactic is unethical and should not be accepted practice. An example would be where they apply to have extended hours of operation.

- Any stockpile is to be stored at a lower height than that of the lowest bund. There is to be a difference in height between the two of no less than 1 metre

Reason: By being maintained at a lower height, it will lessen to a small extent, the amount of dust leaving the quarry boundaries. The height difference has to be substantial in order to
be effective. Fulton Hogan have only said it would be lower. 1cm would be lower - but would be ineffective.

- An end date for land use to be stipulated, which is not to be beyond the time frame requested for discharge.

Reason: It is unreasonable to leave the community in doubt as to when the lifespan of the quarry is to end.

- If asbestos is detected in the properties on site, full disclosure of any disposal is to be made. Methods and location of disposal of this material to be reported to the Body representing the Templeton Community (NOTE: Fulton Hogan have consent to infill land in Templeton with material containing no more than 5% of asbestos).

Reason: Full transparency of procedures will be required as this is a high risk material. Assurances need to be made it will not be covertly dumped in the site mentioned.

- Water quality testing to be conducted a MINIMUM of every 6 months to establish presence of contaminants. This to be done at the applicant’s expense, and by an accredited and fully independent laboratory that is not one regularly used by quarries. If any resident has genuine concerns regarding contamination of their well water after the only introduced variable being the quarry, the quarry is to also pay for their water to be tested in accordance with the above.

Reason: To ensure that there is no contamination of water at any level. It ensures the applicant takes ownership and responsibility for their activities, and does not put the onus of proof on well owners. It should be up to the applicant to prove any contamination of nearby wells is NOT due to their activities. Not for the well owner to prove that it is.

- Monitors to be sited on any boundary where any quarry operations (not just extraction or crushing) are within 500m of residential properties. The placement of the monitors to be made clear on their website, where the locations can be seen and verified by anyone. PM10 readings to be shown live at all times via a website accessible by the public. If there is an exceedence based on an hourly average, (NOT 24 hour average) operations are to cease until mitigation is implemented to reduce the level of dust created. Operations permitted only if monitors are operational.

Reason: This distance is set out by ECAN, and it should be followed fully. An hourly exceedence will evidence significant levels of dust, and it should follow such an exceedence should be dealt with immediately. By stipulating operations can only occur only if the monitors are operational, it will encourage the applicant to ensure they are maintained at all times. If viewable from outside the quarry, it will discourage any possibility of visible tampering.

- With regards the water usage consent granted to the applicant, the readings taken along with calibration of the meter are to adhere to the following criteria:
a) Measure the volume of water taken with an accuracy of +5/-5% of the actual volume taken. Electronic readings to be taken.

b) Provide data in a form suitable for electronic storage that is shared with the Templeton and Weedons Community for viewing at any time.

c) To be inspected annually and re-calibrated accordingly by an independent verifier.

d) Water reading to be taken before pumping starts for that day, and at the end of pumping for that day. (If no water taken on any given day, that is also to be recorded)

e) Readings to be supplied each week for the first 6 months, then after that to be supplied fortnightly.

Reason: To ensure that the applicant is not withdrawing more than it has been allocated to use as per the consent granted for water use.

- Cameras to be operational around the site, showing live view operations, 24/7 of the entire area. To be funded by Fulton Hogan, with footage viewable at any time via a live feed by any interested party.

Reason: 1) It should encourage compliance by the applicant at all times. 2) It provides an opportunity to obtain evidence supporting concerns or evidencing consent breaches that would otherwise be difficult to obtain. We do not have eyes inside the quarry, and there is a very heavy reliance on the applicant being honest and transparent at all times, with particular reference to record keeping. 3) It would encourage more robust investigations once complaints or concerns are raised with the relevant council authority. It has been apparent that issues are not followed up adequately and site visits are few and far between.

Therefore sanctions are never considered or even possible, in lieu of the absence of corroboration by the body that should be investigating. The presence of onsite evidence should negate the practise of asking the applicant for an explanation and accompanying paperwork - and giving credence only to that which they provide.

- a) All ponds to be established are to fully comply with the notes set out in the SDC Engineering and Design Services Plan.

b) The ponds are to be lined with clay or other material permitted within the plan, with evidence provided to show what has been used.

c) Prior to use, all ponds to be inspected by an independent source to ensure they do comply with all aspects of the Plan.

d) A water loss test to be conducted prior to use, with the water loss rate/leakage to be recorded as an initial reading.

e) During the lifetime of the pond / quarry, the water from the ponds to be tested both for quality and leakage at the same time the bores are tested. This to also be undertaken by an independent and suitably qualified person, with readings being made available as part of the site manager's report.
f) If there is leakage occurring beyond the initial reading when the pond was established, or there is contamination of any level or kind, the pond to be out of commission until remedial work is undertaken to return it to an optimum operating standard.

g) Full details of how these ponds will be rehabilitated to be included in the Rehabilitation Plan prior to consent being exercised.

h) The base of the pond to be no lower than 3m above HRGWL.

Reason: There is scant information regarding the construction and maintenance of the ponds in the application. The ponds will be a high risk activity with regards to contamination of water. Therefore the bed of the pond has to be significantly higher than HRGWL in order to be safe at all times. If water levels rise as expected due to the CPWS, the pond would become a high risk for resultant contamination. It would be difficult to remediate / raise the pit level once it is in operation.

The ponds must be lined with clay or similar. This is a requirement as outlined.

Water has to be tested regularly, to ensure any leakage is not going to pose a threat to water below. The applicant has said there will be no contamination, but this cannot be taken at face value. For example, they have indicated they will use chemicals as part of their water mitigation in some areas of the quarry. There is no mention of what those chemicals are, or what products will be used. Nor have they indicated how they will isolate the chemicals in the areas of use so as to prevent them from eventuating in the ponds.

By publishing the results, it will encourage the applicant to be transparent and compliant at all times. Many rely on wells in this area, and it is important they are aware of what is happening with regards to water usage.

The rehabilitation of the ponds should be detailed as part of the rehabilitation plan and is a key issue in the findings of the Environment Court.

- No extraction or stockpiling within 500m of any boundary (including the Dawsons Road boundary) until such time the shelterbelt is a minimum of 5 metres in height / 2 metres in depth. The benchmark for this already exists on the Curraghs Road side of the site and has been shown in the application documentation.

Reason: A substantial shelter belt will offer some protection from dust dispersal and noise. It cannot be permitted that operations be allowed when the only barrier is in the form of a 3m bund and some plants that are still in early stages of growth.

- Any operating point within the quarry (e.g. loader to plant, crushing/screening section, conveyor system) is to be at its highest point a minimum of 2 metres below the height of the lowest bund.

Reason: To minimise the dust dispersal beyond the confines of the quarry. These activities will account for a significant amount of dust, so the difference in height will be appropriate taking into account these are high risk activities.
No later than 1 month prior to operating, any sensitive location with a boundary within 250m of the outer boundary of the stage due to be utilised, to have baseline dust monitor testing conducted. This to include property (external and internal) as well as personal monitoring. This to be conducted by ECAN and with funding by FH, utilising an independent company that is not used by quarry companies. Further testing using the same systems to be undertaken at 6 monthly intervals whilst that location is within 250m of current operations (to include land clearance, bund forming, stockpiling, extraction or rehabilitation). Should the levels of PM10, PM2.5 or RCS be more than 20% higher than the initial base reading, the property to be deep cleaned at the applicants expense.

REASON: In order to get a full understanding of any issues arising from dust originating from the quarry, it is necessary to get the base line reading prior to quarrying commencing. Then, if there is a clear correlation with increases in levels, it should result in a) enhanced mitigation by the applicant and b) gives the person or persons affected directed a better chance of recourse, should there be correlation to quarrying activities. For example, ill health resulting whereby the symptoms are identified as being associated with exposure to dust, which had not previously been present.