

Thank You for the opportunity to address this meeting.

I am Bob Rushforth. I reside in Killybegs a few miles from the proposed development. ~~but~~ with my wife I own land ~~just~~ <sup>within</sup> 250m ~~from~~ the development on which we keep our horses and other animals and where we spend a significant amount of time.

I am here to speak against the development and explain why I believe this appeal should be rejected.

There have been, prior to this current application, two earlier planning applications to allow mineral extraction. Both were refused.

As stated in the application, minerals can only be extracted where they exist. The presence of minerals at this site was obviously known about yet the site has ~~not~~ <sup>never</sup> been recognised as a mineral safeguarding area

so presumably an assessment was made about the suitability or more accurately unsuitability of extraction at this site or the site was determined to be of little significance.

(This point being recognised by Mr Simon Rees acting for the appellant, who, in the opening session of this hearing described the site as "A VERY SMALL DEVELOPMENT" and "INCONSEQUENTIAL ~~to~~ IN TERMS OF OTHER QUARRIES".



When considering the proposed site it is of note that both phase 2 and phase 3 are part of the Pilling Moss Biological Heritage Site as identified by Lancashire County Council working with the Lancashire Wildlife Trust and Natural England. These locally identified sites together with the statutory wildlife sites make the most significant contribution to the biological diversity of Lancashire.

On their website LCC state:

"ANY LOSSES OF THESE SITES WOULD BE REGARDED AS SIGNIFICANT BEYOND THE IMMEDIATE LOCALITY AND WOULD BE DIFFICULT OR IMPOSSIBLE TO MAKE GOOD FOR ALL PRACTICAL PURPOSES. THE SURVIVAL AND CONSERVATION OF BIOLOGICAL HERITAGE SITES IS THEREFORE A KEY INDICATOR OF SUSTAINABLE DEVELOPMENT IN LANCASHIRE."

The last sentence clearly questions whether the proposed development can be considered as a sustainable development.

The removal of ~~materials~~ and existing materials and replacement with imported materials which will not have the same characteristics will permanently change the nature of the site.

Conductors discussion  
- top soil / sub soil mounds  
beneath grassed oves - ?

"The priority habitat of coastal and floodplain grazing marsh is highly sensitive to soil changes which can cause significant damage or degradation to its ecological value. The health of this habitat depends on specific soil moisture levels, water table height and nutrient levels."

Mitigation hierarchy:

Significant harm to priority habitats must be avoided. If avoidance is impossible, impacts must be mitigated, or as a last resort compensated for."

i further note that the land which comprises phase 3b and phase A are identified as COASTAL AND FLOODPLAIN GRAZING MARSH in the priority habitat inventory.

A priority habitat being any habitat published on the list of living organisms and types of habitat which in the Secretary of States opinion are of principal importance for the purposes of conserving biodiversity. (941 of the Natural Environment and Rural Communities Act 2006)

As previously stated the development on phase 3b will remove existing materials and replace with imported materials with different properties which will change the current characteristics of the site. On phase A it is proposed to cover part of the area with concrete which in the planned restoration will remain with the development of a number of leisure lodges permanently destroying this priority habitat.

Guidance states that "PLANNING PERMISSION SHOULD ONLY BE GRANTED FOR A DEVELOPMENT WHICH IS NOT LIKELY TO ~~HAZE~~ RESULT IN THE UNACCEPTABLE ADVERSE IMPACT ON, OR DAMAGE TO KNOWN PRIORITY HABITATS." There are of course exemptions to general rules eg strategically important developments, no alternatives to development. There are alternative sources for the sand + gravel which will no doubt be explored during this housing.



When considering potential damage to the environment and ecosystems it is of importance to note the proximity of the proposed ~~site~~ development to Nationally and internationally important designated sites. Published consultations with LCC Ecology dept, 6/10/23 and 16/11/25 and Natural England 16/10/23 and 28/5/25 all contained advice that a ~~an~~ Habitat Regulation Assessment would be required. To date no Habitat Regulation Assessment has been published. Without such an assessment demonstrating lack of adverse impact on the designated sites permission for the development should not be granted.

## National Planning Policy Framework

NPPF states a planning authority should ENSURE that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety.

Language is important

ENSURE - means to make certain, guarantee.

Legally this places a very high burden of responsibility on any decision makers.

Aside from these concerns there are even more important reasons for refusing this appeal. The residents of the properties located very close to the site who will be exposed to increased noise and dust destroying the amenity of their properties they currently enjoy, and potentially causing a risk to their health.

I have particular concerns about the dust that a working sand & gravel quarry will generate. The developer will talk about mitigation but studies show increased levels of dust including harmful particulate matter as you get closer to working quarries. In much of what I have read a figure of 100m is mentioned as being the distance from which the most notable ~~effect~~ dust effects will be seen. There are residential properties much closer. Planning guidance in Wales demands a 100m buffer zone between sand quarries and residential properties. ~~The dust will be~~ The dust ~~is~~ generated will contain both larger particles, disamenity dust and smaller particulate matter which is harmful to health.

I know this topic is to be considered further so I will limit my comments to a few critical points.

← P.M. is defined as a class one carcinogen with no safe threshold level. The <sup>PM</sup> targets referred to by the developer are not safe levels they should be seen as stepping stones on the journey to reduce exposure to particulate matter a policy which is protective of health. It is the reduction policies which



is protective of health not the target figure. There is no safe  
~~A B~~ level. Adverse health effects are seen below the  
prescribed levels ~~even after short~~ Adverse health effects are  
seen even after short term exposure to raised levels of pm  
particularly amongst young, elderly and people with  
underlying conditions. These vulnerabilities applies to a  
number of residents ~~at~~ in the properties close to this  
proposed development. In simple terms this ~~development~~  
proposed development is simply too close to people

THE BENEFITS OF THIS DEVELOPMENT DO NOT OUTWEIGH  
THE POTENTIAL RISKS TO THE PEOPLE AND THE ENVIRONMENT

