

Haddiscoe Parish Council would like to request that this additional information is reviewed as we feel that Min 25 of the Minerals and Waste Local Plan is unsound.

Public/ Parishioner Health Impacts

A dust expert has responded to a current planning application at the proposed site, this is included at Appendix 1. Dr Bull remains concerned about the lack of a robust analysis of PM2.5, the lack of compliance with current and emerging legislation on PM2.5 and the impact this could have on our parishioners health.

The proposed Crab Apple Lane Min25 site remains too close to the village of Haddiscoe and people's homes. There are uncertain negative impacts on the health of the parishioners of Haddiscoe and Norfolk County Council has failed to assess the health risk from harmful PM2.5 particulate matter.

We would like to formally object to the uncertainty that including Min 25 into the plan would bring to our Parishioners Health. We believe that NCC has a duty of care to the Parishioners of Haddiscoe.

Impact on the Bridleway

We would like to highlight the fact that on the west side of the village (including the roads surrounding the proposed site) there are no pavements. The only place that villagers/pedestrians can walk safely away from traffic is BR5 (the bridleway across the proposed Crab Apple Lane development). The village does not have a shop, public house or post office and therefore this hinders safe access to the village's closest shop.

In the long term, the resulting incline and decline in the bridleway from a quarry will render the bridleway inaccessible to some elderly and MIP (Mobility Impaired Person) villagers. During the period of the development, horses using the Bridleway could be put in danger by their proximity to heavy industrial machinery. The Parish Council formally object to the negative impact on the usability of the Bridleway (BR5) if Min 25 was included in the plan.

Impact on the Church

Min 25 will have a permanent negative impact on the setting of the Grade 1 listed St Mary's church and the visual plane to the Grade 1 listed St Mathius Church, which have been in a greenfield agricultural setting for over 1,000 years. (See Appendix 2) During the period of operation of the site, the development will negatively impact on the peaceful and tranquil operation of the church and the operational graveyard and war memorial, which is only 50m from the development, with excavation activities, gravel sieving and 40 plus daily lorry movements. We note that Historic England have serious concerns about the introduction of an extraction site at Haddiscoe due to the harm it would cause to the historic environment.

Appendix 1

Haddiscoe Quarry– Air Quality Assessments 13 February 2024

Michael Bull and Associates Ltd (MBAL) previously proposed a review of the Dust Assessment produced by Air Quality Assessments for the proposed sand and gravel extraction at Haddiscoe, Norfolk (dated 12 December 2023). Following the submission of this review a response has been prepared by Air Quality Assessments Ltd (titled Response to Representations) that attempts to address some of the comments made by MBAL (and other parties). This note briefly responds to the “Response to Representations” report.

Both MBAL and Air Quality Assessments Ltd have presented their case on various aspects of the assessment and the planning authority is able to review each case presented and prepare their decision having considered the evidence before them. MBAL stand by the technical comments made on the assessment and invite the planning authority to take these into account in their decision. However, MBAL do consider that it is necessary to address one point in the overall methodology where the Air Quality Assessments Ltd response is erroneous. Namely that the appropriate threshold concentrations where health effects of fine particulate matter can be discounted. As noted in the original MBAL report, the use of a concentration threshold of $17\mu\text{g}/\text{m}^3$ as an annual mean PM10 concentration is suggested in the appropriate guidance.

However, the regulatory environment and health evidence related to fine particulate matter has clearly changed since the guidance was prepared.

As noted in the IAQM guidance the threshold is based on the likelihood of the 2010 annual mean objective for PM10 being exceeded (see Section 5.2 of the guidance). However, quite clearly the evidence relating to health effects of fine particulate matter has changed since the implementation of the original air quality standards in the UK in 2010. This is evidenced by:

- The introduction of new targets for PM2.5 in the UK in 2023 through the Environmental targets (Fine Particulate Matter)(England) Regulation 2023;
- Publication of new air quality guidelines by the World Health Organisation in 2021 that reduced the guidelines for PM10 to $15\mu\text{g}/\text{m}^3$ as an annual mean (compared with the current UK standard of $40\mu\text{g}/\text{m}^3$);
- Publication of new air quality guidelines by the WHO in 2021 for PM2.5 of $5\mu\text{g}/\text{m}^3$;
- The recent provisional agreement by the European Union of new air quality standards proposing annual mean PM10 and PM2.5 standards of 20 and $10\mu\text{g}/\text{m}^3$ respectively.

The IAQM also acknowledge that the focus is shifting from PM10 to PM2.5 when examining human health effects of particulate matter. In the second paragraph of its construction dust guidance¹ issued in January 2024 it states “*Exposure to PM10 has long been associated with a range of health effects, with an increasing focus on the smallest particles such as PM2.5 and smaller*”

The Air Quality Assessments Ltd response notes several guidance and public inquiry decisions that have used the $17\mu\text{g}/\text{m}^3$ level however, there is a responsibility to base decisions on the best available science and not on outdated guidance and appeal decisions. As noted in the IAQM Code of Professional Conduct, members should be “*guided by the principle of applying the most appropriate science*”.

It is quite clear that the evidence is that there are health effects of fine particulate matter (as PM10) below the $17\mu\text{g}/\text{m}^3$ level as evidenced by the changes in standards and targets and that there is an increasing focus on PM2.5 rather than PM10, and it is therefore inappropriate to maintain that the use of the outdated threshold in guidance is correct. As a result, a health related assessment should be provided for this application.

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Appendix 2 : Views from St Mary's Church across the proposed development site



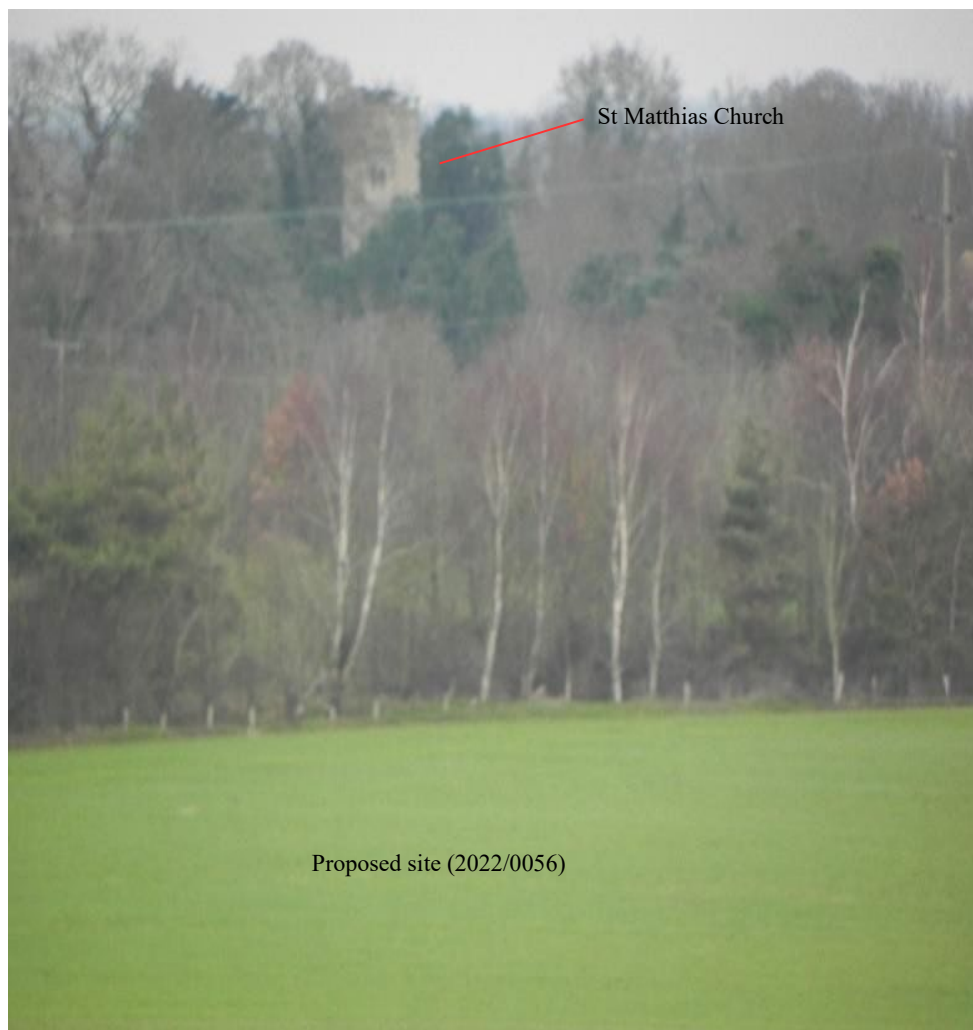


Photo taken from the tower of St Marys Church zooming into St Matthias Tower.