

Comments on the EIA Scoping Opinion from Save Lucklawhill Community Action Group

We have serious concerns about the scope and details of the proposed EIA Scoping Opinion and whether it is fit for purpose

Proposed Extension

The EIA needs to include a full and detailed explanation of why an extension is necessary, given the extensive mineral reserves that still exist as part of the current planning permission.

3.1 The 3 million tonnes aggregate that could be yielded would represent 150,000 x 20t lorry loads and twice as many journeys because lorries arrive unladen. That represents 300,000 lorry journeys and a lot of fine particulate air pollution of significant danger to human health. See also 5.1 below.

3.2.4 Lorries are not always sheeted now. An accident at Tai Teak corner reported on Balmullo Community Facebook site 17th April 2024, records a lorry losing rocks (which are still on the road) and damaging a campervan and two other cars. For an insurance claim a report must also be made to the Police. This incident is also relevant to 6.1 below.

3.2.5 Restoration

Restoration and quarry lifespan

It appears that minimal restoration has been carried out since the granting of the last planning permission in 2008. The EIA needs to explain what restoration has been carried out to date and needs to include a detailed programme for future restoration with dates. Without dates the restoration is purely notional, as appears to be the case with the 2008 permission. When the previous application was considered (2006-08) statements were made at the time that the closure date for the quarry would be in around 20 years' time (i.e. around 2025 - 30). The proposal for an extended quarry clearly changes this scenario. The EIA needs to answer the questions: why has the old scenario changed? and what is the new scenario?

NatureScot (formerly SNH) queried whether the establishment of heathland could work and asked for evidence of how and where this had been achieved before. See Visual Amenity 2.17 from the Departure Hearing. Clearly, they doubted whether this type of restoration would work.

3.3 Water management

All the environmental hazards created by the quarry need to be assessed cumulatively (i.e studies on the basis of the exiting disbenefits together with the deteriorations that will result from a quarry extension). This is recognised by SLA for noise but needs to be extended to the other considerations. This is because, fundamentally, it is how the hazards will be experienced by the local population and because the Balmullo settlement pattern has changed since the granting of the 2008 consent.

A full survey is required of how water generated by the quarry activities (including altered run-off) has affected the significant deterioration of the minor road (see also 3.5 below).

The effect of the Quarry proposal on SEPA's Lucklawhill PVA 07/15 should be fully assessed.

3.4 identifies that Quarry blasting is restricted to between 1000-1200 and 1400-1600 Mon to Fri. However, a recent blast took place in very low cloud conditions at 1310hrs. This is a breach of planning conditions. We suggest that Fife Council should examine the Blasting Records that Breedon are required to keep and make available.

3.5 Access is also via an unmaintained, rapidly disintegrating minor road that is part of the Core Path Network used by pedestrians, cyclists and horse riders.

3.6 A full survey of the current inadequate fencing around the site needs to be carried out. The fencing at the top of the Quarry, immediately above the cliffs, is currently in a very poor state of repair. It is not safe for children, dogs, deer or horses and is not suitable to exclude stock such as cattle and sheep.

3.7 The EIA Scoping Report acknowledges the local economic effects of the quarry are likely to be minimal. Details of where the workers employed by the quarry (6 jobs) live need to be provided so that the 'local' employment can be properly defined.

5.1 There are only 2 AQMAs in the whole of Fife so it is meaningless to say that Balmullo is not in one. The residents of Balmullo are very aware of quarry dust in the air. Although the lorry traffic may not be planned to change, our understanding of the consequences of exposure to an additional 300,000 diesel lorries (3.1 above) has changed beyond measure. They expose people to PM2.5 particulates which are linked to many serious diseases:

From "About Air Quality" <https://www.scottishairquality.scot/air-quality>

"Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year being attributed to long-term exposure (UK Committee on the Medical Effects of Air Pollutants). In 2018, Health Protection Scotland estimated that approximately 1700 attributable (premature) deaths in Scotland annually can be attributed to air pollution."

It is essential that air quality is considered as part of the EIA

5.3 Clearly visual impact needs to be looked at from the west and south of the site as that is likely to be where the greatest visual impact is.

5.4 Noise. All the locations for a noise sound survey are North of the current workings and do not include the modern build at Pitcairn and Anderson where noise is a particular problem. There should be noise monitoring west and south of the Quarry workings as well as on Lucklawhill itself, where most people are likely to be impacted. Noise needs to be monitored under all wind directions as it is only monitored at low wind speeds.

5.6 Water

Assessment of the consequences for Flooding in the Lucklawhill PVA needs to be included.

https://www2.sepa.org.uk/frmstrategies/pdf/pva/PVA_07_15_Full.pdf

6.1 Accidents.

There is no mention of the danger of fly rock on the hill. There is evidence of fly rock outside the perimeter fence. Fly rock can cause injuries and fatalities. There is no mention of how this will be managed safely and this should be part of the EIA scoping report.

6.3 Climate Change

It is essential that the EIA includes a separate chapter on climate change given the importance placed on it by the EIA Regulations and NPF4. Within this chapter the issue of how an extension to the mineral extraction site relates to the need to minimise emissions should be included.

“Every stage of a quarry’s life cycle comes at an enormous environmental cost: loss of natural carbon sinks, eradication of biodiversity, noise and air pollution, and disruption of natural streams and springs. And these losses can never be reversed, even after quarries are inevitably abandoned.” ECOS 03 October 2023.

Very recent research from Britain Talks Climate shows that across the UK the top concern was protecting nature and wildlife when asked to rank issues that the Government could prioritise in relation to the environment and climate change (Britain Talks Climate webinar May 2024). This proposal will destroy nature and wildlife.

6.4.1 Desk Study

Records for 2023 will not be included if they have not been verified and incorporated in Fife Nature’s records yet.

6.4.2 Field Survey

Extending the EIA into May would be beneficial for recording some breeding birds and butterflies (see below)

Badger Survey: Scottish Badgers have recommended a full, independent badger survey

Reptile Survey. FARG have highlighted the potential presence of common lizard and ensure that a baseline ecology survey includes an in-season reptile survey to a NatureScot approved methodology. Common lizard is a UKBAP priority species with a highly restricted distribution in Fife. Did the consultant use the NatureScot approved methodology?

What has been redacted under bat section and why? What has been redacted under pine martin and why?

The Butterfly Survey will have missed Green Hairstreaks which are on the wing in May. Desk study may have missed a new arrival, the Wall butterfly in 2022 and 2023. A Moth survey is also very important due to rare species already recorded in the vicinity.

Public access to the raw data collected during Scoping Report surveys is needed

6.4.3 Initial findings

There is reference to a small proportion of the Local Wildlife Site (LWS) being lost, but a proportion has already been destroyed during the previous authorization and the site will be diminished further

by this proposal. Including what has been lost already as much as 20% of the LWS could be destroyed. More of the LWS, which includes rare grassland habitat, will be lost to the construction of the replacement new path and 4WD track to the summit.

7.1.2 FIFE Plan sub 1 states that development of extraction will only be supported where the proposals “Do not result in any unacceptable impact on communities, the environment”. Clearly, the impact will be substantial on both the local community and the environment.