



THORP ARCH TRADING ESTATE ACTION GROUP
OBJECTION TO PLANNING APPLICATION 13/03061
2,000 HOUSES ON THORP ARCH TRADING ESTATE

Volume 3 – CONTAMINATION ISSUES

Contact: Peter Locke, Chairman
14 Thorp Arch Park, Thorp Arch, LS23 7AN



Added congestion



Loss of prime agricultural land



Overwhelming local opposition



Site asbestos contamination



Gridlock on Bridge Rd again



Poor accessibility



Does this look brownfield to you?



Unsuitable re-routing of local traffic



Loss of flora and fauna

CONTAMINATED LAND

Planning application 13/03061. 2000 houses on Thorp Arch Trading Estate.

NB The convention used for the references is in paragraph 2 below.

1. Objections on the following grounds:

- 1.1 The site should be treated as a Special Site; it is known to be contaminated, and was an explosives site. The Environment Agency should be brought in immediately, before any planning application is decided (BAE 1.2 – final paragraph).
- 1.2 Far more detailed information about the levels of contamination is required before any decisions are made regarding suitability for housing.
- 1.3 The remediation methods proposed do not take account of the mixed chemical/explosive/asbestos hazards, and the potential for hot-spots – see 5.2 below.
- 1.4 Risks to the health of the public during remediation, and to any future residents, and in particular children and pregnant women, once housing is on site. Airborne asbestos fibres travel a long way, so could pose a risk to anyone downwind of the operation.



Warning notice for Zone 3. Children should definitely be kept away.

- 1.5 Phasing. If this site is to be considered for housing development, it is essential that the whole site is fully remediated before any development is permitted to begin. Children are more susceptible to the effects of chemicals, and more inquisitive – they get everywhere, and are attracted to try to enter 'restricted' areas. The risks if they are living on site, before full decontamination, are obvious and totally avoidable.
- 1.6 Explosion risk. The site has already claimed one fatality due to explosion (WYG 3.3). To assume that the risk of explosions is 'low' seems reckless – many of the areas of the site have been unused and very infrequently accessed, if ever, since closure. The assumption of 'low' explosion risk leads to all the risk tables (WYG section 7, throughout) being

incorrect. WYG 6.2.2, final paragraph, confirms “the potential for initiators/detonators is considered to be significant”.

- 1.7 Deliverability/viability. The remediation difficulties and costs have, in our opinion, been significantly underestimated. There is every chance that they will make the whole project unviable. In addition, if the zone 1 housing is allowed to proceed before full site decontamination, then the viability of further housing is financially compromised (with the decontamination costs now falling only on the incremental housing) and as such it is highly likely that the housing development will stop at that point. This would leave an even less sustainable development, without facilities on site.
- 1.8 The risks associated with the burning site cannot be quantified until its location and boundaries are certain (WYG 3.4). There is a significant possibility that the burning site may be in zone 1.
- 1.9 The potential hazard from the on-site landfill (which presumably contained all manner of hazardous material, as the policy was to retain materials on site) has not been evaluated at all. (WYG 2.2 zone 6).
- 1.10 The risks associated with the external and on-site railway routes have been ignored – see 5.3 below.
- 1.11 The sampling regime proposed is too hazardous – see 5.3, 5.4, and 5.5 below.
- 1.12 The proposed remediation techniques are impractical. Because in zone 3 the buildings were demolished by explosion, any asbestos present is likely to be, all or in part, in small fragments or even dust. The concept of decontamination presented to us by Rockspring – of hand-picking the asbestos from excavated material on a conveyor belt – seems totally impractical, and ignores the other dangers of explosive materials and chemical contamination which are likely to be co-mingled, and will be very difficult to identify under such circumstances. Reuse of soil heavily contaminated with asbestos dust is unacceptable, so there will be very considerable quantities of contaminated material to be disposed of offsite.

2. Conventions:

For simplicity, the following conventions are followed: references to the WYG Phase 1 Geo-environmental desk-top study (section 13 of the EIA volume 2) are referred to as **WYG**; references to the Stanger report as **Stanger**; references to the Powel Associates Ltd report (EIA volume 2, section 13, appendix C) are referred to as **Powell**; references to the 'Environmental Agency R&D Technical Report P5-042/TR/03 on Land Contamination: Technical Guidance on Special Sites: Explosives Manufacturing & Processing Sites' are referred to as **BAE**. The numbers following refer to section numbers of those reports.

3. Alternative environmental approach:

The objections above, and narrative which follows, clearly show the degree of risk and potential harm from the decontamination required to make this site suitable for housing. They also indicate that the costs of such decontamination are likely to be significantly underestimated. Additionally, large quantities of hazardous material are likely to be generated, which will need to be moved off-site and taken to specialist landfill sites elsewhere.

Given that the current contamination is not apparently affecting the environment, or aquifers, does it not make much more environmental sense to leave the site undisturbed – after removing any exposed surface contamination (some of which is due to recent fly-tipping)? This accords with best current practice.



Recently fly-tipped material. Includes asbestos roof sheeting. Resulting from Estate maintenance activities?

The site can then continue to be secured – particularly in zone 3, where the buildings were demolished presumably due to their level of potential contamination.



'The mound'. Large hill probably made up of demolition material from original ROFF buildings, in zone 3.



View from 'The Mound'. The extent of vegetation and scrub growth can be seen.