

From: rod axon [REDACTED]
Sent: 03 September 2024 21:38
To: localplans@charnwood.gov.uk; Richard Bennett
Subject: Response to Local Plan modifications Land Allocation HA 60 Land off Melton Road East Goscote
Attachments: HA 60 East Goscote Mr Rod Axon(1).pdf

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Dear Richard:re the consultation on the Local Plan

I wish to submit a response to the modifications to the Local Plan in relation to HA60 allocation in East Goscote.

I attach a PDF document.

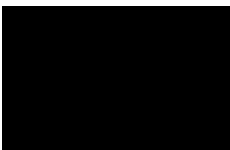
The allocation for this site has increased to 256 from 223. This land suffers from a severe constraint i.e. 90 of the allocated dwellings are planned on contaminated land. These 90 dwellings will be more complex and time consuming to build, if it can be achieved. The land is potentially badly contaminated.

My contention therefore is that 180 dwellings should be allocated to this site in order to enable delivery at or near the end of the decade.

Sincerely

Rod Axon

Mr Rod Axon



03/09/2024

Response re Local Plan Revisions in relation to Housing Allocation HA60 - Land off Melton Road East Goscote

This land has been revised in the Schedule of Proposed Main Modifications to the Local Plan 2021-2038 from 223 to now accept 256 dwellings. This proposal is unsound.

This land is suitable for no more than 180 dwellings due to contamination on site affecting up to 90 of the proposed units.

The contaminated land is the 2.7 Hectare area of war time quarry and tip to the south of the site that has a depth of deposited material of around 4.6 to 4.8 metres. It consists of three main strata, including a c. 1 metre layer of unrecorded waste on the quarry floor. This then appears to have been capped with clay and sandy material by 1950; the remaining void was filled with recorded 'inert' waste for 4 years from 1978 to 1982 and finally restored to agricultural land.

The quarry first appears on record in the 1940s aerial photography but not in Ordnance Survey mapping until 1959.

The quarry was used to supply the building materials for Royal Ordnance Factory no 10 Queniborough which operated for three years producing 9 types of munition from 1942-1945. This quarry is directly associated with munitions manufacture and according to Dr Black for the Environmental Consultancy Enzygo, acting for the land agents, Gladman Land -

““There is evidence (air photo dated 1944), indicating that part of the subject site was used as a 'waste burning ground' for the ROF. The waste residues on these sites include ashy soils, which can contain a range of metals and metalloids and PAH (polynuclear aromatic hydrocarbons). However, these contaminants are present on most sites with past industrial use and would not preclude development, provided that appropriate investigation and if necessary remediation is undertaken.”

Dr Black appears certain that the burning ground which would include waste explosives was present on site and also seems confident that contamination may be confined to the compounds stated above.

He does not elaborate on what remediation would be needed to enable safe development. Some exploratory work has been done by Redrow but a complete list of contaminants and receptors has still not been provided. A lower 'capped' stratum of waste remains to be fully identified and Environment Agency conditions have not yet been fulfilled. (see below)

All types of explosive compounds used in ROF Factory 10 Filling may have been proved and tested on the burning ground as well as time expired explosives being disposed of by burning. **Therefore, the residues may be more extensive than Dr. Black detailed**

The list of explosive materials that may have been handled at Factory 10 is below. The report is one on safety in Filling Factories produced in 1950.

Materials Handled and Stored at Royal Filling Factories

Chemicals and explosives in order of mention in the report

Fulminate of Mercury
Lead Azide
Styphnate
Composition Exploding CEX
High Explosive HEX
Gunpowder
Tetryl
Trinitrotoluene TNT
Picric Acid
Amatol
Ammonal, Fumyl, Smoke Compositions These may not have been used at ROF 10
Cordite
Cordite RDB
Ballistite
Notrocotton propellants.(sic nitro?)

Many of these compounds will leave residues and the heavy metals will presumably endure in the ground. This is why it is potentially the most contaminated in Charnwood. This was the only Royal Ordnance Factories (ROF) explosives plant in Leicestershire.

Currently, this lower layer of waste is capped and safe for those living in the vicinity and also presumably for the aquatic environment and the air.

If the Local Plan retains 256 as a viable option for this site then three requirements are outstanding

1. A complete investigation and chemical analysis of the entire quarry and tip in accordance with the Environment Agency(EA) conditions for the outline permission. And
2. ALL contaminants, ALL receptors and ALL pathways should be fully identified and listed as required by the EA
3. A comprehensive plan for remediation of the site should be prepared.

Planning Policy Statement 23 Annex 2 paragraph 2.51 states that

“The standard of remediation to be achieved through the grant of planning permission for new development (including permission for land remediation activities) is the removal of unacceptable risk and making the site suitable for its new use... As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as contaminated land under Part IIA of the EPA 1990 [Environmental Protection Act 1990]”

The remaining c.15 Ha of land is capable of accepting c.180 dwellings and could begin development well before the end of the decade. Access is approved and viable for the remaining land. This proposed figure of 180 is realistic and deliverable within a reasonable timescale, provided differences between Charnwood Borough Council and Redrow concerning housing mix can be resolved.

The contaminated section is extremely problematic and complex and could be allocated for less sensitive land use in the Local Plan. A suggestion locally is for Solar PV use to benefit the new community and existing neighbours.

Sincerely



Rod Axon

NB

Should the documentary evidence supporting the above statements be required, I would be pleased to provide full details and the locations of the original documents in the several planning applications for this site and at the National and Local archives.

Many of the above observations have been researched as part of my work on the history and development of East Goscote