

Cambridge Friends of the Earth would like to make the following submission regarding Application 21/05476/FUL, relating to land South of Coldham's Lane.

In respect of the above application, Cambridge Friends of the Earth has the following concerns:

Soil Contamination

We notice that soil contamination in Parcels A and B, as mentioned in Tables 3a and 3b in Section 11.4 of the applicant submitted document: Ground Conditions Appendix 10.4 Gas and Groundwater Monitoring Report Part 1 Page 1-50 5857504, includes:

Asbestos
Heavy metals,
Polycyclic Aromatic Hydrocarbons (PAH),
Petroleum Hydrocarbons (TP ,
Phenols,
1,2,4 Trimethylbenzene

These contaminants occur at levels in Parcel A and B which, by the Developer commissioned report's authors (GB Card and Partners Limited) own admission, present a Medium to High risk to Receptors, Medium and High Risk Levels being defined as:

High Risk:

Contaminants are very likely to represent an unacceptable risk to receptors. The site is probably not suitable for its proposed purpose <>. Enforcement action is possible.

Medium Risk:

Contaminants likely to represent an unacceptable risk to identified receptors. This site is probably not suitable for its proposed use. Action is required in the medium term.

The elements and organic compounds found have the potential to be toxic and we wonder what concentrations will remain, even after remediation.

Additionally, we would draw your attention to Section 12 Conclusions and Recommendations of the same document and the following extracts from the statements therein: Parcel A
"Significantly elevated contaminant concentrations have been reported in the leachate and groundwater beneath the site. The contamination identified has potential to impact the local surface water receptors. Elevated concentrations of methane and carbon dioxide have also been recorded at the site. These have potential to pose a risk to the future site users and neighbouring properties."

Parcel B

"The data for Parcel B show elevated contaminant concentrations in both the capping layer soils and the waste deposits beneath the site, which are likely to pose a risk to the future site users (whether the site is to be redeveloped for residential or commercial). In addition, significantly elevated contaminant concentration have been shown to be present in the lechate and groundwater beneath Parcel B. As with Parcel A the contamination has potential to impact the local surface water receptors. Significantly elevated ground gas concentrations have also been reported".

We would also draw your attention to the table Parcel A, B and C (the Lakes), Land South of Coldham's Lane Soil Assessment Criteria in Appendix B of the applicant submitted document Ground Conditions Appendix 10.6 Outline Remediation Strategy Part 1 Pages 51-100 for more details on the concentrations of many of the contaminants present in the site.

Further information on these soil contaminants can be found via the following links:

Heavy Metals: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4427717/>

Polycyclic Aromatic Hydrocarbons: <https://pubmed.ncbi.nlm.nih.gov/9498904/>

Phenols: <https://www.epa.gov/sites/default/files/2016-09/documents/phenol.pdf>

1,2,4 Trimethylbenzene: <https://nj.gov/health/eoh/rtkweb/documents/fs/2716.pdf>

Groundwater Contamination

Adding further weight to our concerns, we also note the considerable groundwater pollution outlined in the applicant submitted document: Ground Conditions Appendix 10.4 Gas and Groundwater Monitoring Report Part 1 Page 1-50 5857504 .

This report suggests that considerable sources of groundwater pollution and significant concentrations of contaminants, exist within the landfill sites (A and B) which are proposed to be built on.

To this end, we would draw attention to the following example exceedences noted by the applicant for groundwater contamination, though please note that further exceedences are listed for further chemicals in this report:

Parcel A - Upper Groundwater Analysis
Hexavalent Chromium: 37 exceedences
Mercury: 8 exceedences
Napthalene: 66 exceedences
Fluoanthene: 99 exceedences
PFOS (low level): 86 exceedences
MCCP (Mecoprop):1