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To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : DOC/2022/0035 Site Address: Land At Blythe Park Sandon Road Cresswell
Staffordshire Comments by: Luke Emery

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Submission: Objection

Comments: Dear Mr Haywood

Objection to Discharge of Conditions DOC/2022/0035 ; Land at Blythe Park Development

Perhaps of all the questions that surround the use of this land, the most prominent and indeed, in the eyes of some residents, most concerning are those pertaining to the unfortunate contamination as a result of an interesting and, in some regards, unusual past. As I have no doubt you will be aware, the land saw use during the Second World War; a time where it, and the surrounding countryside, played host to American soldiers and chemical impregnation experts. This land was likely chosen due to the, at that time, already well-established chemical industry in the hamlet of Cresswell; allegedly a key contributor to the pollution that is now found across the breadth of the eastern and western fields that are proposed for development.

Now, in 2022, there are new uses being considered for land and with that comes the prerequisite of checks and balances. Of course, one of these is condition 24 which forbids the development of the eastern land, with the exception of a now seemingly abandoned plot 1b, until appropriate site investigation and risk assessment has been completed and approved by the local planning authority (LPA).

It is specifically this condition, for which the applicant is seeking approval to consider to be met, which appears to be incompatible with the information that has been provided in the application; and for which proper scrutiny and appropriate resulting actions are so essentially required.

Attached to this application is a desk study, reviewing previous investigations undertaken at the eastern site which concludes that the previous surveys of the land are considered sufficient and that no further action is recommended. This point appears untenable for multiple reasons and, as such a significant responsibility, must be considered within the full context of the land.

 

Perhaps the most concerning conclusion is that the significant parcel of land, that remains without any form of outline planning permission, to the southern end of the proposed development does not require any further consideration; it must be noted that the applicant intends to erect helipad and hard stand infrastructure in this area, the helipad being located atop a pond feature which is immediately adjacent the point, identified in the

Wardle Armstrong Geo-Environmental Assessment, which yielded the highest number of contaminants when tested for groundwater exceedances. The desk study attached to this application explicitly states that the 2017 report reviewed for this application does not include any exploratory locations. It also appears to play down the size of the land that is outside of outline planning, asserting that the boundaries „differ slightly“ between that which has existing permission and that which is sought to be addressed in the discharge of conditions; the scale of the land encompassed by the development border is visibly demonstrated to have near doubled in attached plans and it cannot be considered a sound conclusion to merely dismiss the additional land as low risk without any investigation. One may speculate that the aforementioned groundwater results, listed as WS17, corroborate the reports provided in the original application for outline permission across the entire site of a historic spillage on the eastern field. Establishing a pond feature, immediately adjacent to groundwater exceedances, must surely warrant appropriate further investigation before being considered appropriate for discharge?

The data, upon which this desk study is based, has faced historic criticism and has previously been raised as a point in the agenda of Staffordshire Moorlands District Council (SMDC) Planning Committee meetings; specifically, the Wardle Armstrong assessments are noted to not take proper account of toxic waste that was spilled on the eastern field (Thursday 22nd November 2018) and noted the higher-than-average cancer rates found around the hamlet. Further information from the same agenda raised the concerns that the report did not include a study of the existent developed land at Blythe Park where the road connection for the proposed new industrial area would exist.

These criticisms are not only put forward by residents, in reference to previous Wardle Armstrong assessments, the Pollution Officer remarked that proposed investigations were focussed on whether the site was being actively contaminated rather than holistically considering if any part of the site was affected by contamination be that historic or current. Proposed monitoring locations were noted as not being (statistically) sufficient to use as an indication of site wide conditions (Appendix 4, Wardle Armstrong Geo-Environmental Assessment).

The Wardle Armstrong report itself features desk study of resources including the Environmental Statement of the site, which appears to demonstrate conclusions for risk assessments that conflict with those presented in the Geo-Environmental Assessment. Section 11.185 of the Environmental Statement assesses that it is likely that several phases of site investigation will be necessary and a reasonable worst case scenario in the operational phase of the eastern development yields results of major-moderate effects to human health.

 

Whilst it is disappointing that Staffordshire Wildlife Trust are unable to facilitate consultation on this matter, due to insufficient capacity, I wholeheartedly welcome their point that the absence of a comment does not mean that there are no ecology issues in this case. Bearing this in mind, please can due consideration be given to the proximity of the proposed development to the Nature Conservation Area, as listed in the interactive local plan and safeguards upheld to ensure that any condition considered to have been fulfilled is not done so at the expense of the diverse ecosystem which defines a rural settlement such as Cresswell.

I object to this application for Discharge of Conditions reference DOC/2022/0035 as it does not appear that the report submitted to consider the condition related to contamination investigation (condition 24) draws sound conclusions from the data available nor does the report consider the context of the surrounding land in its assessment.

Yours sincerely

Luke Emery

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