

KENSAL CANALSIDE: CONTAMINATION ISSUE (JA 15.11.23)

**Documents related to case PP/23/06575 (click on link below)**

<https://planningsearch.rbkc.gov.uk/publisher/docs/5E8493CB6F38D00D1B9AC035A8C41421/Document-5E8493CB6F38D00D1B9AC035A8C41421.pdf>

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## **SUMMARY OF FINDINGS FROM ENVIRONMENTAL STATEMENT Vol.1 Chapter 12, Ground Conditions and Contamination.**

### 1. ASSESSMENT METHODOLOGY:

According to the latest academic research (ref, Professor Harrison, Birmingham University, Precautionary Principle) - there is no safe level of toxic waste contamination for human or animal health.

This research is not referenced or “recognised” in any of the supporting documentation regarding contamination and environmental pollution.

Toxicity in children lasts long into adulthood - a key concern is proximity of the site to local schools and shopping at Sainsburys while remediation work is being undertaken.

Ballymore does admit however, that there is “***no quantitative methodology for impact assessments***”.

So how can we/they possibly evaluate the extent and nature of toxicity in the soil / gas emissions and its impact on human health and protected wildlife in Conservation areas (eg Kensal Green Cemetery)

### 2. REMEDIATION METHODOLOGY

**Ballymore have not supplied any details about their remediation strategy. This is a serious error of omission,**

What they have provided is a summary of remedial methods mostly based on containment of dust.

- DMP (Dust Management Plan)
- CEMP (Construction Environmental Management Plan) method.

The CEMP should set out, as a minimum, site specific measures to control and monitor impact arising in relation to construction traffic, noise and vibration, dust and air pollutants, land contamination, ecology and ground water.

For a development of this size , being a historical Gasworks site with extensive contamination in such close proximity to schools and residential housing ( bordering 3 boroughs) - the only safe and effective strategy is long-term bioremediation and much more extensive investigation and a plan to remediate or contain the neighbouring site (*Kensal Green cemetery*) as well as the '*unknown parts*' of this whole site.

The report says: **once the topsoil is removed, a second investigation is required.**

That means the claim that this development will take 11 years to complete is simply fanciful.

The suggested time frame doesn't take account a realistic time scale to complete thorough (bioremediation) of the site, which in the opinion of external consultants could take anywhere between 15-20 years.

They adopt the **Transport Analysis Guidance (TAG )** -this is inappropriate for a former gasworks.

They also use the **Pathway-Receptor model assessment method**. None of these assessment methods are perfect.

### 3. CONTAMINATION AND ENVIRONMENTAL REPORT FINDINGS

The findings confirm the presence of a former 1844 gasworks (situated on the Eastern part of the site; an area which is likely to be highly contaminated) but the report focuses instead on other areas.

This is due to this hybrid planning application. (ie they can side step coming up with a plan to deal with the wider contamination issue because under Hybrid rules, they can cherry pick one small area of the site to focus on.- building the new enlarged Sainsburys Supermarket

However they also go on to admit a **need for future co-ordination as each area** (or PLOT) seeks planning permission.

The gasworks present an unknown threat **Ballymore cannot get access to it.**

Ballymore are literally not allowed to deal with some areas and others are inaccessible due to buildings or previous work

**Ref: 'Environmental Statement Volume 1, Chapter 12: Ground Conditions and Contamination, Sept 2023, page 12.13 Clause:12.176**

which states:

**"no work (in the South and South East corner )...shall commence' 'until details have been submitted to and been approved in writing by the local planning authority'.**

This is an indication of how toxic the soil in this part of the site actually is in the area that is historically the location of the 1844 Industrial site.

The area records **67 tanks onsite**, many described as” **unspecified**” in the report.

There were 14 historical 'energy features' and these are all related to a coal to gas plant. We also know, though it is not included in this report, that this plant in 1844 was a shale to gas plant. **That is a significant issue and thus a major omission.**

#### 4. IMPACT ON HUMAN HEALTH

The potential for remediation to fail and release the following is extreme:-

Asbestos  
Phenols  
Amines  
Solvents  
Ammoniacal Liquor  
Alkaline conditions  
Cyanide  
Sulphates  
Heavy metals  
PAHs  
PCBs  
other Hydrocarbons  
VOCs  
TPH  
BTEX/ MTBE  
UXO

The report indicates the presence of features that are sources of problems. These include:

- A former East to west railway
- A section of the Grand Union Canal, in-Filled and straightened. This is a potential source of gases.
- \*A former sewer has been identified that could carry toxins from the cemetery. That has been collared. If it is damaged this could send **necro-leachates and embalming fluids into the site.**

This means that there is a huge risk to:-

Workers - HIGH RISK  
Residents of houses - MODERATE TO MAJOR ADVERSE RISK  
Residents of Houseboats - SIGNIFICANT RISK  
Future occupants - HIGH RISK  
Future users of soils and parks - HIGH RISK

They suggest a remediation technique that will deal with these toxins **with no evidence to back up the effectiveness of this approach.**

What is provided is merely an outline plan involving watering soil and moving the contaminated soil offsite to a **soil hospital** ( either by Canal or most likely by lorry using the Harrow Road) .

This is incidentally the same remediation technique that was used in Southall adversely affecting the health of residents.

They admit that at **WS17** (bore hole) they found **extremely toxic levels of NAPL** - another word for that is called 'Coal tars'. Coal tars, the major source of toxic gases and thus the most significant problem since these gases once dispersed can travel up to a distance of 5 km. .

Instead of using this term - a term that a layman could understand, the report uses an unfamiliar acronym That is misleading to local residents.

- **NAPL** is Non-aqueous Phase Liquids, or organic liquid contaminants. They are known as immiscible. That is, certain proportions a mixture does not form a solution. That is the characteristic of coal tar. Coal tar is acidic and water insoluble. Tar composition varies with the process and type of coal used, but it is generally composed of a complex combination of polycyclic aromatic hydrocarbons (PAHs), phenols, heterocyclic oxygen, sulphur, and nitrogen compounds, and their alkyl derivatives (Harris et al., 1953)

The report recognises that there will be **nuisance odours, and exposure to toxic gases.**

For adjacent areas this will be **moderate to major adverse** (significant) without mitigation. However the potential for failure of mitigation is huge! Since the technique of remediation necessarily involves digging up the soil which releases toxins and poisonous gas into the atmosphere.

This is glossed over, but noted as a **“major risk”** to everyone in the area, including local residents.

No wind direction report is included but South-West winds are prevalent. The whole area is thus open to contamination from toxic gas and dust.

In addition to this, it should be noted that the report states that **no PE pipes or copper pipes can be laid in this area because the level of toxicity in the soil is so bad it would destroy both!**

- They use **TAG Method** to assess RISK
- **Impact on human health** ( see list of chemicals identified)  
No details are provided - simply marked in their report as Adverse Significant risk or low risk, or medium risk
- Exposure to these chemical toxins (including Benzine) can cause symptoms such as Irritation of nose, blindness, asthma, COPD, cancer