


Risk Assessment and Conceptual Site Model

Peace Wood Quarry

Naylor Industries PLC

Document Reference: 320/1—R1.1 – RiskAssessment_CSM

MPG

Minerals
Waste
Environment

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Site / Project:	Peace Wood Quarry
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1.0 Introduction

1.1 This report should be read in conjunction with Plan ref: *320/1 – CLRA-1*.

1.2 Planning application ref: 2023/91949, for the extension of Peace Wood Quarry ('The Site') is currently undergoing determination by Kirklees Council. The Council's Environmental Health (EH) Officers have requested an appraisal of the risk of contaminated land at The Site.

1.3 The Site is adjacent to a former inert waste site, as well as the existing Peace Wood Quarry to the north. The former waste site is now a restored agricultural field, and monitoring of groundwater takes place in connection with this Environmental Permit for the waste operations. Two of the monitoring boreholes are located within the proposed extension area.

2.0 Risk Assessment

2.1 The Site is currently two agricultural fields, which are separated by the existing quarry's access track, bounded by dry stone walls. A review of historic OS maps (the oldest being published 1854) show only agricultural fields, although field boundaries have changed. Over the past 3-4 years (whilst MPG have carried out monitoring of the boreholes), the fields have only been used for sheep grazing. The borehole logs from these boreholes do not report any made ground, only soils and natural geology.

2.2 The existing quarry and former waste site are separated from The Site's extraction area by a stand-off of at least 10m.

2.3 A site-walkover has not revealed any physical evidence on-site or via available aerial photography (dating back to 2003) of any waste having been tipped on The Site. Some soil was stored whilst restoration of the former waste site was nearing completion, in the northernmost corner of The Site. However, this was removed by 2009 as the former waste site was restored.

2.4 As shown in the Conceptual Site Model (CSM), referenced *320/1-CLRA-1*, there are no identified Sources of contamination. Theoretically, contaminants could have been deposited at the former waste site, through non-conforming waste that may have unintentionally been tipped ('rogue loads'). However, there is no Pathway by which this could have contaminated The Site.

2.5 To the west, an agricultural field has only seen agricultural processes, according to aerial imagery. In 2020, the aerial imagery shows materials being spread across The Site, though information from the existing quarry's operator confirms that this was manure being spread as fertiliser. The imagery shows a large mound of material and it was confirmed that too much was brought to the field, with the excess subsequently removed. The mound is not present in the next available aerial image. Again, this would not be considered as a Source of contamination.

2.6 There remains a negligible risk of residual contamination on the access track from leaks from HGVs and plant, as well as possible pesticide / herbicide uses across the fields. However, as stated, the fields appear to have only been used as grazing pasture.

2.7 In terms of Receptors, the only potential Receptor would be site operatives. However, it is noted that these operatives would mostly operate from inside plant and machinery and would have little direct interaction with the ground.

More importantly, the first stage of the proposed mineral extraction would be to strip soils and overburden from The Site. These materials would be stored in bunds until restoration, when they would be placed back on top of infill materials to provide a growing medium for planting / seeding. Again, this would all be done using plant and machinery. Most of The Site's operations would take place after this process. Should any contamination exist, there would be no interaction with the soils during the majority of the operational period.

2.8 The Council have provided verbal, and anecdotal, evidence of some waste being stored / tipped outside of the former waste site, potentially in 1993. There is no evidence that any contamination was caused by the 1993 incident, though no further information is available on this. If waste was indeed stored or deposited outside of any Permitted boundary, then it is extremely likely that this was inert waste associated with the adjacent waste site, and would not have caused any contamination.

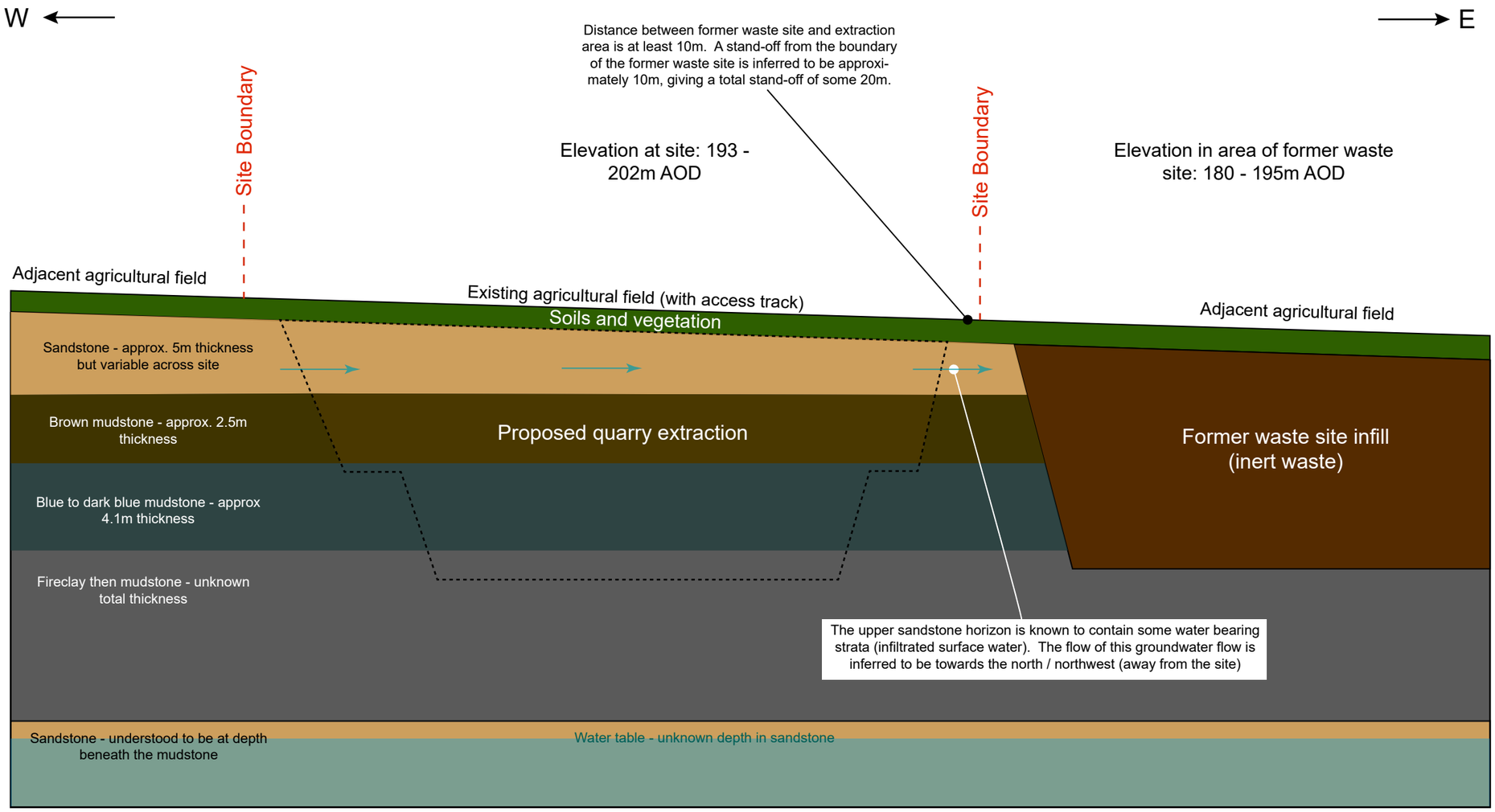
3.0 Conclusion

3.1 It is concluded that there is no connection between Source and Receptor. This is predominantly because no Source can be identified that has caused contamination at The Site. Even if the adjacent former waste site is considered to be a Source, there is no pathway by which any contamination could have reached The Site.

3.2 It is considered that, even if a Source and Pathway could be identified that had contaminated The Site in any way, site operatives (Receptors) would be very unlikely to have any exposure to the contaminants, as they would be operating

from within a vehicle / piece of plant.

3.3 We trust that this document and the associated CSM is sufficient to confirm that there is negligible to no risk of contaminated land at The Site.



Drawing Title:

Conceptual Site Model - Contaminated Land

Key:

Notes:
Drawing is schematic and not to scale, and is not intended to accurately represent topography, depths of extraction or infilling, or relative distances.

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