

6 CONCLUSIONS

In conclusion it is considered that the development proposal is:

- Unlikely to deliver the benefits claimed, namely cessation of leachate pumping
- Likely to result in surcharging of the waste with risks of leachate leakage, instability in the waste mass and further subsidence of ground levels
- Likely to cause pollution by changing from a managed system to an unmanaged system with inadequate baseline characterisation or monitoring
- Potentially unsafe with respect to land stability, pollution and migration of carbon dioxide and methane
- Inadequate in providing protection to controlled waters or human health
- Excessive in terms of the volumes of material imported to site to meet the objectives

It is also considered that the development proposal:

- Fails to demonstrate the special circumstances required in order to develop in the green belt, as there is neither an assessment of current pollution nor reduction in pollution as a result of the proposal
- Fails to meet the requirements of DM2 to
 - provide appropriate information to demonstrate that impacts can be reduced to acceptable levels
 - make a positive contribution to reduction of carbon emissions or the number of journeys made
 - Restore to a beneficial afteruse and manage landscaping (when judged on its own merits without Phase 2)
- Fails to meet the requirements of NPPF with regard to :
 - preventing pollution or land instability
 - taking into account ground conditions and risks arising from land stability and contamination
 - provision of adequate site investigation information prepared by a competent person
- In restoring site levels to planning levels, requires the import of volumes of material that are in excess of those needed to regrade site for drainage purposes and is therefore not in accordance with the principles of sustainable re-use of waste materials

It is probable that some remedial work is required to the landfill cap to manage infiltration, however it is highly unlikely that this will result in cessation of leachate generation or leachate pumping. The proposed scheme is excessive, poorly defined, poorly designed not properly supported by site data, and doesn't consider that there might be an environmental imperative for ongoing leachate or gas management.

Inadequate site investigation data has been provided to demonstrate that the scheme will be effective, and on the basis of the evidence provided, the applicant does not properly understand the ongoing potential for the site to cause harm.

It seems that at the heart of this proposal is a desire to cease active management of landfill leachate and gas. At worst this scheme could be considered an opportunistic attempt to cover the costs of much needed maintenance works by import of an unnecessary volume of waste soils with insufficient safety controls on the quality of the material, the rising leachate levels, stability of the waste mass and generation of gas. At best it is an ill judged and technically flawed proposal that cannot, on the basis of the information provided, be judged to be safe or effective.