FRIENDS OF RYEBANK FIELDS
RESPONSE TO MMU
SITE INVESTIGATION REPORTS

From local insight we know that Ryebank Fields was former clay pits for Jackson's Brickworks; the pits were 40ft deep and stretch to within 6 feet of neighbouring properties and St. John's primary school. We also know the pits were used as an unregistered landfill site for 30 years from the mid 40's to mid '70s. The land was then reclaimed by the City Parks Department under 'Operation Eyesore' and gifted to MMU as a sports facility. The recently published MMU site investigation reports confirm that the "entirety" of Ryebank Fields is "made ground" (meaning landfill), which is up to "12.70m" deep. For the investigations, 30 trial pits were dug across both fields. The reports confirm that the land is severely contaminated due to the toxic nature of the historic landfill. In summary we have identified the following serious concerns regarding any development:

Asbestos and other ground contaminants
Soil analysis found elevated levels of heavy metals such as lead, mercury and copper plus a wide range of highly flammable and carcinogenic hydrocarbons. Asbestos was found in 4 trial pits. Leachate analysis and groundwater samples revealed high levels of arsenic, chromium, zinc, nickel and cyanide, all of which require further assessment. Due to the toxicity and instability of the landfill many tons of this waste will need to be dug out and removed, creating a significant and sustained airborne risk. It will be transported along narrow and congested residential streets, adjacent to a primary school, to be buried elsewhere.

Ground instability
The ground is very unstable due to being made up entirely of landfill. The materials have been assessed as ranging "from very loose to dense". Due to the extent and depth of the landfill the "most suitable foundation solution would be to utilise a driven pile into the natural underlying stiff to very stiff clay or implement a raft foundation solution". Pile foundations would need to be at least 40 feet deep to reach beneath the landfill, and works would be required to remove the "extensive buried obstructions" using a "cut/fill" process "to provide suitable development platform levels". The majority of trial pits either collapsed during the site investigations or were hit by "rapid water strikes". Solutions required for this at the building stage "may cause structural damage to building substructures in close proximity to the site".

Ground gas
Landfill creates harmful gases such as methane and hydrogen cyanide. Parts of the southern field, adjacent to the school, were assessed as being "Red/ CS4" which denotes high levels of ground gas. This "would suggest this area is not suitable for residential development". It's recommended that "additional monitoring wells are placed in the south of the site to fully delineate the zone of gas risk along with a phase of continuous ground gas monitoring". The remainder of the southern field tested as CS3/high amber. "Hotspots" or likely areas of volatisation or ingress into dwellings have been located. Further testing is required as these areas may need to be removed. Residences will require special building regulations such as mechanical ventilation systems and vapour membranes due to the associated risks.

Flooding
As the land is greenfield, a developer will need to demonstrate that the rainfall run-off rate post development won't be greater than the pre development greenfield run-off rate. This will be assessed by the Environment Agency at the planning stage. Appendix 8 of the flood risk and drainage report shows that large catchment "detention basins" will be required on each field to control run-off, thus creating more areas that cannot be used for housing.

Unexploded bombs
Special clearance will be required prior to the installation of any foundations due to an identified "elevated UXO risk on Site". The clay pits were flooded with water during WW2 so a UXB would have been "immediately lost beneath the waterline and would not have resulted in any persistent observable evidence". Due to the depth of foundations required, "these works would be at risk of a UXO encounter. Similarly, if piled foundations extending below WWII-era ground level are required, the likelihood of a UXO encounter will increase. Furthermore, a UXB buried under the peripheral parts of The Site could be encountered during more shallow excavations, as WWII-era ground level will exist at a shallow depth here. It is possible that the post-war fill material occupying the majority of The Site is UXO contaminated and therefore a UXO encounter during shallow intrusions within this made ground cannot be discounted also". Required risk mitigation measures are UXO Safety Awareness Briefings prior to all intrusive works; on-site supervision by an EOD Engineer at the construction phase, and an optional Intrusive Magnetometer Probe Survey at all pile locations.

We do not believe that Ryebank Fields is a viable site for development due to the elevated costs and airborne pollution risks associated with remediation. The reports highlight that extensive further investigations are required in order to inform a planning application. MCC have recommended that MMU should have the land assessed under Section 2A of the Environmental Protection Act 1990 (Contaminated Land Regs). The onus for remediation, in law, falls to the landowner. MMU however intend to sell the land and their problems on to a developer.

MMU's Human Health Risk Assessment states: "Providing the soils are not disturbed there is deemed to be minimal risk to the general public." All the advice we have received points to the most viable end use solution for Ryebank Fields as an open space/local nature reserve; remediation for which will be far less costly, far less intrusive and therefore pose far less risk.
NO DIG = NO DEVELOPMENT = NO POLLUTION.

We will continue to campaign against any development of Ryebank Fields. To add your voice to our campaign please contact your elected representatives:

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You can also contact Michael Taylor, Head of Regional Affairs, at MMU Michael.Taylor@mmu.ac.uk

All information is taken from the e3p Phase l and ll Geoenvironmental Site Assessments and the Flood Risk Statement and Drainage Strategy, BWB. The UXO Risk Assessment is attached as Appendix Vl of the Phase l report. The full reports can be found on the MMU website (under the last 2 headings at the bottom of the page): https://www.mmu.ac.uk/ryebank-fields/