16 February 2003

Wigan Council's Director of Planning and Development
Mr. Martin Kimber,
Civic Buildings,
New Market Street,
Wigan

Dear Mr Kimber,

I am aware that there are plans to turn the former Sandyforth opencast mine, off Ashton Road, Windy Arbour, into a domestic waste tip. I wish to formally object and ask you to ensure that this letter is put before the committee when the application is considered.

Unless the council can be 100% certain that the waste is totally **inert** and will not cause harm or danger to all life forms (human, animal or plant) then on environmental grounds alone this venture should not be allowed to proceed.

Essentially what is being done is that a random collection of waste is being dumped with no guarantee that neither chemical nor biological interaction will ever occur which could damage the environment. Therefore without a full risk assessment of all the environmental hazards being undertaken it would be highly irresponsible for this project to proceed. As you are no doubt aware the Environmental Act puts strict controls in place for emissions to Land, Air and Water thus they all should be considered

Land

Without sampling and analysing the cargo of every single lorry before it arrives at the Sandyforth site there is no guarantee that it will not contain trace elements of heavy metals such as Lead, Cadmium or Mercury or other toxic substances. Therefore what policing measures will be put in place to protect against dangerous substances being hidden within so-called legal loads of waste?

Will the tipping area be fully lined with an impervious high impact liner so that in the event that toxic substances being tipped they will never enter the surface or underground watercourses?

What is meant by impervious liner is one that will not leak within the next 1000 years irrespective of the mechanical forces or chemicals that attack its surface.

If a liner is to be used what evidence does the council have to show that they never leak? There is a body of international evidence to suggest that all landfill liners will leak eventually. Typically within five years, usually by which time the contractor has gone and it is left to the tax or ratepayer to fund any clean up costs.

Also what evidence does the council have to demonstrate the there will never be any ground movement or subsidence in the vicinity of the Sandyforth site? This is crucial because if ground movement is likely it is almost impossible to guarantee that any liner installed at the site will not become damaged, thus allowing uncontrolled leachates to discharge from the site.

Water

Will leachates be collected in a holding tank and rendered harmless before they are discharged into the surrounding environment?

Would council members be prepared to drink the leachates discharged from this site? This is not as unreasonable as it sounds because young children, farm, domestic and wild animals could quite easily drink the leachates?

How will the chemical composition of the leachates be monitored and what standards will be applied to ensure that they are rendered harmless?

Also who will carry out the monitoring? One would hope it is an independent professional body not the contractor.

One understands that it is almost impossible to monitor all the underground watercourses because essentially they are a myriad of very small fissures. Also underground water courses in the locality are likely to be more unpredictable because of the coal mining that has taken place over the centuries. Therefore does the council have hydrogeological maps of all surface and underground watercourses showing where water from the site flows to?

How will the council ensure that underground watercourses remote from the site are monitored to establish that they have not become polluted?

Does the council know how long it takes water to migrate from the site to all lower lying bodies of water i.e. Smithy Brook, River Douglas or the flashes at Poolstock/Westwood?

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Insect Population

Has the council had any studies carried out to assess the chemical composition, bacteria and viruses carried by the existing insect population? Will these be monitored during the whole life of the project? This is especially important because any flying insects could very quickly transmit diseases to the wider human and animal population.

Future monitoring and use of the site

What will be done with this site when it has been filled with waste? Will the surface be capped and if so what methods will be used? How will pollution discharges be monitored once the site is no longer operational and who will pay for this?

Bankruptcy of the contractor

The public has already witnessed the fact that contractors go out of business leaving it to the public purse to foot the bill. Therefore in this case will the contractor be forced to take out adequate insurance for the following:

- To ensure that there is adequate funds to complete the work in the event of the company becoming bankrupt
- To pay for the cleanup costs of any pollution discharged from the site whist it is operational and for 50 years into the future after operations cease?

Financial Implications

Has the council obtained any estimates for the cost of cleaning up pollutants that are discharged from the site? Intuitively one knows that it would take hundreds of millions if not billions of pounds to clean up pollutants in underground watercourses? Therefore since the principle in law is that the polluter must pay, can the council assure the public that neither the tax nor ratepayers of Wigan will fund any of the costs borne during the whole life of this project? In this case whole life means during operation and at least 50 years into the future after cessation of operations.

Conclusions

Unless Wigan Council can adequately demonstrate to the public that this site will not pollute the environment and also that the council is not exposing the ratepayers to funding costly litigation charges then this project should be rejected.

Furthermore unless the contractor can adequately fund all costs associated with environmental protection and the cost of cleaning up any pollutant discharges during the whole life of the project then again it must be rejected. Also the contractor must have adequate insurance to take account of bankruptcy and for the means to ensure that the project is completed once started.

Yours sincerely

Objection to the proposed Domestic Waste Tip at Sandyforth Farm, Windy Arbour, Winstanley, Wigan

Mr. Martin Kimber, Wigan Council's Director of Planning and Development
Civic Buildings, New Market Street, Wigan.

Mr Kimber,

We wish to formally object to the Sandyforth opencast mine, off Ashton Road, Windy Arbour, being used as a domestic waste tip. The reasons are as follows:-

1. It will damage the environment by polluting the land, air and watercourses
2. The M6 already pollutes the local environment
3. Wigan MBC should be introducing recycling schemes to reduce waste
4. The transport links to the site are unsuitable for heavy traffic
5. It will cause noise pollution
6. It will attract seagulls, flies, bluebottles, mice, cockroaches and other vermin to the surrounding area.

Title	Name	Address	Signature