

1. The part of the draft SPD the comment relates to:

Contamination (Chapter 3.23 page 30)

3.23. Due to the current and historic uses of the site there is the potential for land contamination to be present across the whole site. Any potential risks to human health and / or the environment must be robustly assessed part of the planning application process, with any suitable mitigation proposed where necessary. The landowners must obtain any necessary licences or permits (outside of the planning process) before any excavations, or pre-surveys, that would disturb or break the surface of the land are undertaken.

2. Definite contamination

a. PAHs (polycyclic aromatic hydrocarbons)

PAH was found in samples of soil or sub-soil in the southern part of former RAF Tollerton (PJS Soil Survey May 2022, commissioned by the Vistry Group).

Usually, PAHs are produced by incomplete burning of wood or diesel, oil or petrol.

“PAH” covers a large number of substances, some of which are causes of cancer in humans. PAHs are also associated with cardiovascular disease and foetal abnormalities.

b. PFOS and PFOAs

PFOS and PFOA were found in 2 samples near the current firefighting training area (PJS Soil Survey May 2022, commissioned by the Vistry Group).

PFOS and PFOAs are part of a larger group of chemicals known as perfluoroalkyl and polyfluoroalkyl substances (PFAS).

Their common name is “forever chemicals” because they build up in humans and stay there for decades. There is no demonstrated safe level.

On airfields, a common source of PFOS and PFOA is firefighting foam

PFOA causes certain cancers in humans; PFOS possibly causes cancer in humans (International Agency for Research on Cancer accessed 2025).

c. Surveyors Recommendation for PAH and PFOS/PFOAs

Remediation / Mitigation Measures (PJS Soil Survey May 2022, commissioned by the Vistry Group).

It is recommended that asphalt and any shallow sub-base material is excavated and re-used in less sensitive areas of the site such as under roads / pavements / under areas of hard standing.

It is recommended that an allowance should be made for an appropriate cover system to be incorporated in gardens / landscaped areas for the proposed development which coincides with Made Ground / firefighting area. Hard standing proposed for the remainder of the site should be sufficient to mitigate any risk to human health end users post development elsewhere

3. Highly probable contamination

a. Radium 226

Radium-226 was identified in two locations on council owned land, part of former RAF Tollerton (Rushcliffe Borough Council report 2008). Rushcliffe Borough Council says the radium is not contamination, because no one goes near it and there is therefore no risk to humans on the current undisturbed airfield. This condition will change if and when houses are built in proximity.

Radium is one of the most radioactive substances known to man. It was mixed with other substances to make a paint that glowed in the dark. This was used to illuminate the controls of RAF aircraft to aid night flying. Subsequently radium was incontrovertibly shown to cause bone cancer, particularly if accidentally consumed. Radium is radioactive for thousands of years.

There are photographs of aircraft being dismantled on RAF Tollerton. Other airfields involved in dismantling aircraft have a radium legacy. We believe RAF Tollerton is more widely contaminated than previously known, based on local histories.

A radium survey to the highest standards is required (SEPA) and strict remediation measures should be planned and enforced.

The SEPA guidance is here https://www.sepa.org.uk/media/594570/rs-jg-024_v12.pdf

b. Asbestos

White sheet asbestos is suspected to have been found on part of the former RAF Tollerton. Confirmation would require specialist analysis. All white asbestos contains some brown asbestos.

Brown or blue asbestos is highly poisonous. It was used on wartime aircraft to prevent chafing between metal in the engines, to prevent heat transfer from the engine to aircraft, to insulate ducts and on fire blankets etc.

Asbestos is directly linked to a chest cancer known as mesothelioma. Mesothelioma starts in one cell, and this has led to the notion that a single asbestos fibre can be enough to cause mesothelioma. Naturally the more fibres one is exposed to, the higher the risk. The risk is greatest with blue or brown asbestos.

Given the number of aircraft repaired or scrapped, the risk of asbestos contamination is high. Although no asbestos was noted in the exploratory soil samples on a part of former RAF Tollerton (PJS Soil Survey May 2022, commissioned by the Vistry Group), this did not include vast areas of the former site.

4. Other possible contamination

Lead and arsenic were noted in one soil sample (PJS Soil Survey May 2022, commissioned by the Vistry Group).

Local histories tell of unwanted leaded aviation fuel from old aircraft being disposed of by pouring on the ground.

Arsenic was used to protect wood in aircraft from termites.

5. Why This Matters for residents of Rushcliffe

Contamination may cause illness in the people living on the new housing development, if it is not all removed.

When contamination is dug up, airborne particles may drift downwind to local villages where it could cause harm.

Removal by road risks the health of the people living along the route, as demonstrated by the Corby birth defects, where the area of risk extended 2.5 miles from the demolition site (https://en.wikipedia.org/wiki/Corby_toxic_waste_case).

Removal to new sites risks the health of people near those sites, especially if new planning permissions are granted there (see the Little Stanion controversy <https://www.itv.com/news/2025-10-23/im-not-alone-now-more-families-concerned-about-corbys-toxic-waste>).

If the contamination is buried on site, it will remain a risk because there are always new roadworks, new services to be laid or repaired, new house extensions and new landscaping, all of which will disturb the soil and potentially bring contaminants to the surface.

Finally, contamination is a risk to the construction workers, many of whom will remove some PPE (Personal Protective Equipment) on a really hot day.

6. How to Structure Your Objection

Use your own words, but try to include the following elements:

1. Quote the SPD

Refer to the section on Contamination (Chapter 3.23 page 30)

2. Refer to the PJS Soil Survey May 2022, commissioned by the Vistry Group and the 2008 radium survey by Rushcliffe Borough Council updated in 2025

(https://www.rushcliffe.gov.uk/media/lwujgnuf/2502407conreq_tollertonmhp_briefingpaperfor-residents_finaldraft040725.pdf)

3. Explain the Risks

Say why this matters:

The contamination could cause serious harm to the residents, to nearby villagers and to construction workers. Refer to the Corby poisonings, https://en.wikipedia.org/wiki/Corby_toxic_waste_case

Moving the contamination elsewhere could cause problems if that new site is later developed (refer to the Little Stanion controversy <https://www.itv.com/news/2025-10-23/im-not-alone-now-more-families-concerned-about-corbys-toxic-waste>)

The SPD does not impose any detailed conditions on the developers. The SEPA guidance on radium is a gold standard and should be quoted in the SPD, which is vague and open to interpretation.

The SPD lacks clear review mechanisms and transparency.

4. Request Specific Changes

The requirement for a radium survey of former RAF Tollerton to meet the gold-standard SEPA guidance.

Assurance/ proof that any “cover” will protect from ground contaminated PAHs, PFOS and PFOAs under all circumstances (oil spills, damage, age for example). PFOS and PFOAs can stay in the ground for decades and it is imperative that any “cover” is demonstrated to be effective for decades (not assumed to be).

A requirement that any new work such as house extensions, services etc that would pierce the cover is not permitted in the places where the “cover” is in place.

A requirement that any new ground works are monitored for the disturbance of Radium 226, across all land comprising former RAF Tollerton.

Publication of all contamination assessments.

Clear triggers for viability reviews

No approval of applications until full costs (contamination) are included

5. Example Phrases You Can Use

Please adapt these into your own words:

“I am concerned for the health of future residents, citizens living nearby (within an area subject to airborne particles of contaminated dust), citizens where contaminated material may be dumped and construction workers, all of whom may be exposed to life threatening illness.”

“I am concerned that the SPD allows developers to reduce their obligations towards contamination without sufficient safeguards.”

“The SPD does not account for contaminated land costs, which will greatly affect viability. The costs of the Corby contamination poisonings were paid by the taxpayer.”

“Without stronger review mechanisms, the SPD risks enabling underfunded and unsustainable development.”

Where to Send Your Objection

The email address is: localdevelopment@rushcliffe.gov.uk