



MINUTES OF A PUBLIC MEETING HELD AT CHRIST CHURCH ON THURSDAY 23RD APRIL REGARDING THE VALLEY PLEASURE GROUND

Welcome and Opening Remarks

The Chair, Cllr Andrew Morris-Wyatt, opened the meeting and welcomed all attendees. He outlined the purpose of the meeting, which was to discuss matters relating to the Valley Pleasure Ground, ensure transparency, and provide an opportunity for public engagement.

Present:

Cllr Andrew Morris-Wyatt (Chair of Chalford Parish Council)

Steve Barlett (Environmental Protection Manager, Stroud District Council)

Cllr Sharon Samaroo (Councillor and Chair of Works and Charity Committees)

10 Councillors of the Parish Council

Cllr James Boyle (Stroud District Councillor)

Cllr Chloe Turner (Leader of SDC and County Councillor)

Cllr Gary Luff (County Councillor)

Dr Paul Nathanail (LQM)

Kate Arnold (Clerk)

Lesley Sellars (Deputy Clerk, taking minutes)

Katie Larner (Senior Contaminated Land Officer , Stroud District Council)

Keith Gerrard (Strategic Director of Communities, Stroud District Council)

c.80 local residents

Purpose of the Meeting

Cllr Morris-Wyatt explained that the meeting had been convened to:

- Explain the circumstances at the playing field that led to the Parish Council to ask District Council officers for support
- Why that led to its closure in July last year
- What's been happening since
- Why it's taken the time it has
- Current situation

- Next steps
- Opportunity for questions, submitted in advance and from the floor

He emphasised that he believed all those present had the common objective to work to safely reopen the playing field and progress with a play equipment as soon as possible.

History of the Valley Pleasure Ground

The Chair provided a summary of the history of the Valley Pleasure Ground. The field, measuring 1 acre, 1 rood and 3 perches (approximately 1.25 acres), was bequeathed to the Parish in 1920 by Charles Alfred Apperley to be used as a pleasure ground. The land was vested in a charitable trust, for which the Parish Council acts as trustee.

This trust, along with others, is overseen by the Parish Council's Charities Committee, while the practical maintenance and upkeep of the site is managed by the Works Committee.

The Valley Pleasure Ground was noted as a highly valued community asset, alongside other local pleasure grounds at France Lynch and Bussage, both of which are well used.

Historical Parish Council records were handwritten or typed until 2013. The Deputy Clerk has been examining archived ledgers to better understand the site's past use and was pointed in the right direction by the local History Group.

It was noted that part of the site was used as a dump between approximately 1925 and the 1940s. Swings were installed in 1939, reflecting its long-standing recreational use.

In 1946, the ground was levelled using asbestos-cement materials, reportedly surplus from Fibrecrete, a company which operated from the 1930s to the 1970s and manufactured building products containing asbestos.

The historical presence of asbestos-containing materials on the site was highlighted as significant in understanding the current context and any related considerations.

Recent Events

The Chair explained that in the early 2000s, the presence of white silty substances especially at the wood eastern end had been investigated and tested. It was found to be Fuller's Earth clay which would have been used in the wool industry.

No trace asbestos was found there.

The moles have been around for decades but numbers and activity have been increasing; in March 2024 sixty molehills were recorded and it has become more uneven impacting on the mower.

Consideration has been given to eradicating the moles but that's been discounted so far, believing that would not be a popular action to take, and in any event, our understanding is that other moles will soon take their place.

Residents had expressed concerns about increasing amounts of glass and pottery shards from March 2024.

In mid-2025 public concern was raised about the white cement pieces at the surface and whether these contained asbestos.

Our Groundsmen had been picking up the glass and pottery but in June 2025, when councillors met on site to consider the project to upgrade the play equipment, they looked at the cement pieces and a councillor with some knowledge was also concerned about the possible presence of asbestos in the white cement pieces.

Further, concern was that possible changes in environmental conditions over 60 years, such as hotter drier conditions and degradation of the cement, could mean an increased risk than in the past.

Cognisant of our fundamental duty and obligation as trustees and councillors is to protect land, people (public and employees) and reputation, to respect the law, ensure public liability insurance is in place and to make balanced informed decisions.

We recognised that, whatever our opinions, we do not have the expertise to assess either the materials or the balance between likelihood and consequence of the materials causing harm, which in this case is mesothelioma an incurable cancer.

Especially aware that this is a playground and its primary users are children and young people, nearer to the ground with developing lungs, and who scrabble around and disturb the surface and may pick the materials.

We therefore contacted the professionals at SDC Environmental Health Team and asked for support.

Steve Bartlett was introduced. He introduced Katie Larner, Contaminated Land Officer, Keith Gerrard, Director of Communities, all from Stroud District Council and Dr Paul Nathanail of LQM, who is conducting further tests and a review of the report from Sanctus.

Steve Bartlett – Environmental Land Management

Steve re-iterated when the PC contacted them initially, advised to close the site as a precautionary measure while the investigations were carried out. SDC has a legal duty to investigate potential contaminated sites under Part 2A of the Environmental Protection Act 1990. This is the legislation that the investigations have taken place under. This legislation requires LAs to establish whether Significant Harm is taking place

or there is the Significant Possibility of Significant Harm with the aim of demonstrating that the site is suitable for use.

To assess this any Source (contaminant), Pathway (the way the contaminant can affect the receptor) and Receptors (the body that it effects e.g. humans or the river) linkages are identified which identify potential risks to Groundwater/surface water and Human Health. Where one of these linkages are broken i.e. the pathway, the matter cannot be classed as Contaminated Land. In assessing potential chemical contaminants, there are Generic Assessment Criteria (called Category 4 Screening Levels) for a number of contaminants in soils. These are levels where it is considered that if you are at or below then there is an acceptable low level of risk.

What has changed

Over the years the asbestos has remained buried and effectively sealed by the vegetation/grass layer, meaning there has been no pathway to connect the contaminant to the receptor. The mole activity has disturbed the buried asbestos and brought it to the surface, introducing that potential pathway for exposure to airborne asbestos fibres as the soil dries out. General use of the site, for example through play, could lead to the potential for fibres to be released into an airborne form. It is therefore important to assess this potential risk.

Unfortunately, there is no assessment criteria for asbestos in an environmental setting. To assess the potential harm from asbestos, lines of evidence approach is used along with modelling using techniques such as dustiness tests.

Why the delay

SDC as the regulator, will review all information received and critically evaluate that information in the context of Part 2A. As part of this process, we have had to ask a number of questions regarding the risk assessment process to clarify the conclusions that Sanctus came to. The Sanctus report does not address the specific legal requirements of Part 2A of the Environmental Protection Act 1990. In addition, the risk assessment suggests that the site is low risk, yet remediation has been recommended, albeit on a potentially precautionary basis. Proposed remediation costs for the site vary between £60,000 (permanent closure) to £600,000 (excavation of material to 0.3 metres, placement of anti-dig layer to prevent animal activity mixing the strata and importation of clean soil to raise levels back to existing). SDC was not in agreement with this conclusion without further assessment and, we were also unable to replicate some of the risk assessment methodology. Specifically, in our role as Regulator, we need to be confident in the information and conclusions on which we base our decisions, because it is Stroud District Council that needs to take the final decision on whether the site should be determined as contaminated land. Due to this it was decided to engage a third-party independent consultant to review the information. Paul Nathanail at LQM,

was asked to review the report, assess whether the data is sufficient to come to a recommendation, categorise the site under Part 2A and establish whether any further work is required.

Steve then introduced Dr Paul Nathanail who is a Specialist in Land Condition (SiLC) and a Suitably Qualified Person under the National Quality Mark Scheme (NQMS). Paul is the lead author of the (Construction Industry Research and Information Association) CIRIA (C733) guidance on asbestos in soil and made ground. He developed the CIRIA online training on non-licenced work with asbestos. He has carried out previous work for Stroud DC on asbestos in a Part 2A context and has carried out detailed quantitative risk assessments for asbestos in soil in both Part 2A and planning contexts across England and Wales. He has acted as an expert witness on cases involving asbestos in soil and made ground.

Dr Paul Nathanail

He stated that he had reviewed the Sanctus report, and the main concerns revolve around the limited number of samples that were tested for fibre release, bearing mind that it was a preliminary investigation. The dustiness tests were not carried out upon the samples with the highest concentrations of asbestos present (quantification was not undertaken first) and respirable dust testing should also have been undertaken in conjunction with the dustiness tests. There was concern that the latest risk assessment tool was not used for the risk evaluation process.

LQM undertook the risk evaluation using the (Society of Brownfield Risk Assessment) SoBRA 2021 Methodology and this suggests that the combined excess lifetime risk for lung cancer and mesothelioma is less than 10^{-6} which is a conservative level of minimal risk.

The report identifies that the actual risk could be lower if:

- the respirable fraction of the soils is considered
- not all the fibres released by the two samples tested were asbestos
- if any potential asbestos fibres comprised chrysotile rather than crocidolite and amosite are found as a respiratory fraction from the mole hills.

The actual risk could be higher if:

- material brought to the surface by mole action is preferentially contaminated with asbestos fibres due to the finer fraction that moles will disturb
- asbestos fibres comprised crocidolite & amosite rather than chrysotile.

The report concludes that the available evidence does not suggest that the site meets the definition of contaminated land under Part 2A, in that it does not fall under category 1 or 2. However, the available evidence does not allow a decision on whether or not the site falls into Category 4 – not contaminated land and no further action required.

The report suggests that in order to reduce uncertainty the following could help:

- characterisation and sampling of mole hills
- sampling of materials around potential ACM at the surface, and
- paired respirable fibres in respirable dust and asbestos dustiness testing.

Paul stated that on his visit today, he had taken 20 further samples from 10 locations which will be taken to the laboratory tomorrow. This will take two to three weeks to get results back. Only after this report is received will the Council's decide between:

Option A – No further action if risk remains low which would require demonstration that mole disturbed soil does not materially elevate airborne risk, or

Option B – Proportionate Remediation / Management Plan.

This prevents the Councils from under or over responding and ensures decisions are based on the best available evidence.

Steve Bartlett

Thanked Paul for his visit today.

The results of this investigation will clearly inform Chalford Parish Council's further responsibilities regarding their duty of care to maintenance staff (under the H&S at Work Act 1974), the Trustees duty of care to members of the public and its continued use of the site as a playing field, including informing how potential upgrades maybe implemented.

We appreciate your continued patience with the closure. We understand that it is an inconvenience to some, but we hope that you can understand the reasons lying behind the closure. We will endeavour to have the playground open again at the earliest opportunity.

QUESTIONS RAISED IN ADVANCE

[The white material in the woods used for a bike track is asbestos and has been there for years – what is the issue?](#)

The white material is a clay product known as Fullers Earth. It was historically used for fulling wool (cleaning and shrinking) by textile workers (aka Fullers). It's likely to be left

over from the wool industries along the valley. This material has been tested, and it contains no asbestos or other contaminants of concern. This is a completely separate issue to what we are investigating now.

[Has it ever been brought to your attention that someone has suffered serious harm from the glass, pottery or asbestos fragments?](#)

Not to date. Prior to closure CPC were hand picking the fragments of glass and pottery at the site in order to prevent any harm. For asbestos exposure symptoms only present themselves 20 – 30 years after exposure. So, whilst the investigation into whether there is harm or the Significant Possibility of Significant Harm at the site, the precautionary measure of closing the park was taken to prevent any risk of exposure.

[Can you provide details of the risk of harm on which you are relying to close the park?](#)

The site has been closed on a precautionary basis; this is a temporary measure whilst investigations are ongoing. Asbestos has been found in 23 out of the 30 locations sampled. Most findings are chrysotile (White) in cement bound form, which is generally classed as low risk, whilst it is maintained in this form i.e. not broken up. However, a small number of samples confirm the presence of free fibres and debris within the soil matrix at different depths with one sample containing a small amount of amosite (Brown) and crocidolite (Blue) (higher risk amphiboles).

[Can you explain why signposts for the public about the asbestos fragments have been deemed insufficient to keep the park open while you complete your investigations?](#)

At this time, the investigations undertaken are to establish whether there is an associated risk and to what level. CPC have a duty of care and SDC have a legal duty to investigate. Whilst this investigation is ongoing to establish any potential risk level, it is not felt a sign alone would be a sufficient measure and as such our recommendation is that the site remains closed until such time as it can be adequately assessed. This has also been supported by the Insurance company that has stated that the public liability insurance would be invalid if the park remains open whilst investigations continue.

[If there is no compelling evidence of serious harm in the investigations to date, would you consider re-opening the park with signposts while you complete your investigations?](#)

No, the park will remain closed until investigations are completed and a decision can be taken as to whether it is safe to reopen the park.

[Valley residents are aware that asbestos has been present in the valley since Victorian times. Please can you tell me what the perceived dangers are, at this present time?](#)

The Fibrecrete factory was present in the valley between 1938 & 1970.

The mole activity at the site has brought fragments of asbestos cement to the surface along with the finer fractions of the soil. Sampling to date has shown that there are free fibres of asbestos present within the soil. This material is being brought to the surface where people can disturb it through play, and where it can dry out and potentially release air borne fibres. In turn this can increase the risk of lung cancer and mesothelioma.

[Please provide a chronology of events explaining what has been happening since the field was closed last August and why it has taken 9 months to reach this point?](#)

March 2025 – CPC aware that glass and pottery fragments coming to surface due to mole activity.

July 2025 – CPC aware that potential asbestos cement fragments also being brought to the surface.

July 2025 – Meeting with SDC & initial sampling on cement fragments undertaken to establish whether they contained asbestos cement.

July 2025 – Decision taken to temporarily close the field as a precautionary measure, whilst further investigation took place.

August 2025 – Preliminary site investigation undertaken by Sanctus Ltd.

October 2025 – Supplementary investigation took place (PAHs only).

October 2025 – Draft Rev A Report received from consultant.

November 2025 – Draft Rev B Report received from consultant.

December 2025 – Draft Rev C Report received from consultant.

December 2025 – Final Rev D Report received from consultant.

December 2025 – SDC commissioned 3rd Party Independent review by LQM.

March 2026 – Final report received from LQM (delays due to waiting on clarifications from 3rd parties, such as the laboratory).

April 2026 – Discussions between SDC & CPC about way forward. Decision taken to undertake some additional sampling as per recommendations in LQM report due to uncertainties and lack of data regarding asbestos.

April 2026 – Public Meeting

April 2026 – Additional site investigation undertaken.

[Please explain why the field was closed and what incident prompted this drastic action?](#)

The field was closed on a precautionary basis due to the presence of asbestos cement fragments at the surface.

It is widely known that the Valley Playing Field was built on asbestos and a rubbish dump. My family and friends have used the field for the past 20 plus years. Why is this now a problem? What has changed? Have we all been exposed for the past 20 plus years?

Previously the waste material, including the asbestos, was buried and was in effect sealed beneath the surface vegetation and effectively sealed, therefore no pathway to connect the contaminant to the receptor. Recent mole activity has brought the material to the surface introducing that potential pathway for exposure to airborne asbestos fibres as the soil dries out. General use of the site, for example through play, could lead to the potential for fibres to be released into an airborne form. It is therefore important to assess this potential risk. Environmental legislation has also changed, so once the Councils were aware of the situation there is a duty of care to Chalford Parish Council and a legal duty to investigate for SDC under Part 2A of the EPA 1990.

The Old Neighbourhood Car park is supposedly built on an asbestos dump. If so, dozens of cars use this car park daily churning up dust clouds. Should we be concerned about this in light of the concern over the Valley Playing Field?

The asbestos is sealed beneath the car park hard surface. Thus, there is a break in the Source Pathway Receptor linkage.

What action has the council taken to look at other potential areas within the valley that may be contaminated?

Stroud District Council has a duty to identify and investigate potential contaminated land sites. A strategy has been produced which outlines how this work has been undertaken and will continue to be undertaken. The Council has identified approximately 1750 sites across the district that are potentially contaminated. These sites have been prioritised and will be assessed appropriately. If people are aware of sites that they think are potentially contaminated, then please submit the site information, including address and reasons for believing its contaminated to katie.larner@stroud.gov.uk We can cross reference with our records and make sure we have it identified for inspection.

What affect does the River Frome, that runs through the playing field, have on this ground. Is the contaminated ground being washed down stream? When the field floods does this lead to contamination downstream and if not, why not?

As part of this investigation, the River Frome has been tested to see if the landfill is polluting the river in any way. The investigation has confirmed that there is no risk to the

river. There were no contaminants of concern, other than the asbestos when the soil was tested.

There used to be signs warning users of the field of the potential of rubbish, glass etc coming to the surface of the park. Why has that approach not been continued?

A precautionary approach has been taken whilst the investigation is undertaken. It was felt that just using signs didn't meet the requirements under duty of care to site users, whilst it was unknown what the risk is. As previously stated, there are also issues with public liability if the site were to be open whilst investigations continue.

Will the council be contacting all residents and users of the field to inform them of the potential danger they have been subjected to over the past 20 plus years in using the field?

To our knowledge, prior to the mole activity bringing the asbestos fragments to the surface the asbestos has remained sealed beneath the surface. Exposure under these circumstances is extremely low. As soon as it was brought to the Council's attention, the Council's acted accordingly to ensure exposure was reduced whilst investigation took place.

Has the council acted negligently in its duty of care over the past 20 years and exposed people to risk?

As explained above, as soon as the Councils were made aware of the asbestos fragments, a decision was made to close the playing field. Before this, any asbestos was sealed beneath the vegetation.

What do council records show with regards the history of the land and what it was built on and why it was deemed safe to use as a playing field?

A recent search into the archives has revealed that the area of land was gifted to the Parish in 1920. Swings were installed at the western end in 1937, whilst the eastern end continued to be used as the village dump. Waste material from Fibrecrete was deposited in 1946 to provide a finished level area. The site was then topsoiled. At the time the works took place, the risks of working with and using asbestos were unknown. The site has been used as a playing field ever since.

How much has been spent on this closure to date?

Investigations to date are in the region of £17,000. Excluding Officer time and the investigation undertaken today.

Can the Council provide details of its plan to reopen the Playing Field identifying the relevant milestones, target dates, dependencies on which achievement of those target dates depends, and the responsible individuals, who may be contacted by the public for updates, for each defined action? If such a plan does not yet exist, can the Council

provide the date by which such a plan will be available for public review, and the responsible individual for delivering this action?

Further investigation took place today by Paul Nathanail at LQM. There is a minimum of 15 days turn around at the laboratory and then Paul will require a few weeks to assess the information, undertake a risk assessment and write up the report, so the next date we are aiming for is approximately 4-6 weeks from today. SDC will then need to read the report and decide on next steps, in conjunction with CPC, so around 6 - 8 weeks times, we will be looking to make the decision as to whether the site can be reopened, reopened with management/maintenance, or whether the site will remain closed whilst potential remediation options are considered.

I would like to know if the Parish Council would be able to provide information at the park about any possible risks from using the playing field alongside a disclaimer stating that they cannot be held responsible for any claims that might be made in the future. Individuals could then make their own informed decision about whether they wish to use the park or not?

Issuing a disclaimer does not fully absolve CPC of any duty of care responsibilities. As previously stated, there are also issues with public liability if the site were to be open whilst investigations continue.

What evidence is there of health issues directly caused by asbestos being present in and around the Chalford area?

SDC do not currently hold this information. We will enquire with public health to see if such data exists and will provide any updates on CPC website. There is public awareness of many deaths of Fibrecrete employees and their families with several that were the subject of inquests. There is one inquest recorded where the coroner records a mesothelioma death with no direct link to Fibrecrete.

Are you aware of the other sites that have received grants for remediation work in UK playgrounds and can they offer advice?

There are currently no grants available for undertaking remedial works. There is a scheme that that can assist with landfill tax if we need to dispose of waste material to landfill.

Could local residents help support by fundraising?

Yes, if remediation is required. All fundraising options will be looked at.

The remaining Questions will be answered at a later date. We have not investigated remedial methods in any depth at present, apart from getting indicative costs which vary from £60,000 to £600,000. The Council's need to establish whether remediation is necessary before spending further money on investigating remedial options.

What are the possible remediation approaches being considered and what are the advantages, risks and costs of each option?

Awaiting LQM's report and SDC review.

What level of remediation would make the site safe for unrestricted use?

As above

What are the estimated costs of such remediation?

As previously commented

What funding options are being considered?

See below

Will this be funded by the Parish Council, District Council, grants, or external bodies?

See below

Are you investigating environmental and public health grants available for this type of issue?

There are none other than assistance toward landfill tax if material is removed

QUESTIONS RAISED AT THE END OF THE MEETING

As we have heard that it could be low risk, but if not, have you considered all types of funding streams e.g., grants from National Lottery, Sports England, crowd funding, local fundraising ?

Yes, we would search for grant funding, Deputy Clerk is very good at finding grants and for example Enover, who funded £40,000 for Bussage Park will absolutely be approached. But would also accept help from local residents and consider crowd funding.

Cllr Morris-Wyatt advised that the PC holds a designated playing field reserve of £30k and a general reserve of £100k some of which could be drawn but would have to be restored to meet statutory reserve obligations. PC will also consider borrowing from the Public Works Board

Although this is good news, neither councils have any planning in place. What plans are in place especially with the park not being open for the summer? Public duties have been covered but public duty is also to communicate and this has not been done?

We apologise if you feel there is a lack of communication, but it is difficult to communicate and plan what we don't know. We thought we would have an answer

within a shorter timeframe. We were also cautious not to either cause alarm or understate the risks. What we can say is that we need 2 to 3 weeks for results from the laboratory and a further 3 to 4 weeks for the report from Paul and then SDC will need time to digest this information and inform the Parish Council. SDC cannot guarantee that this will be in the 6 to 8 week time frame but, absolutely agree to a second meeting to communicate the findings to everyone and will keep the website up to date with predicted timescales if it goes over the 8 week period

Doesn't understand why Sanctus Ltd was used, seems crazy, why we used a company that they believed inappropriate for the job, very expensive?

SDC answered that there is a structured way of undertaking this type of investigation and follows stages. These are standard across the country. Sanctus was chosen out of three options. Sanctus are fully qualified for this investigation. They undertook initial samples and reported their findings. SDC asked for further sampling and information. Then decided a peer review would be conducted. Dr Nathanail stated that he would take responsibility for the further 2 months delay but he wanted answers to queries including from the laboratory that undertook the tests.

In 1952, the village raised money for the pleasure grounds and were quite happy to see lorry loads of asbestos being hauled up to the pleasure ground. Children used to use asbestos as chalk when it fell off the lorries. Do Fibrecrete have record of this? Are we still worried about asbestos? died of it, and we don't know where it came from.

Parish Council answered that there is a minute in 1947, thanking Fibrecrete for topping off the dump. There is no record of how many lorry loads.

Dr Nathanail answered that asbestos was widely used. Fibrecrete were doing what lots of other companies were doing at the time and were probably ignorant of the long term health issues. Asbestos waste provided it is well drained and buried is not a problem. It is when it is at the surface and broken up that the fibres can be picked up by the wind and inhaled, that is the problem. It was all done in good faith, but we know better now. Blue and brown asbestos is the worse and is the strong cause of cancer. We are undertaking the sophisticated tests to establish whether the site is safe for its continued use.

Everyone expressed their sadness but could not comment on

County Councillor also commented that thinking about families, that we need to ensure we fill the gap and where can families go in the meantime?

Parish Council answered that there are two other playing fields, Bussage and France Lynch, but we will get some communications to Cllrs Turner and Boyle regarding other options.

A resident stated that it was worrying about the moles. Two simple ways of removing the moles would be to landfill by a metre or raise the water table and flood them out?

Dr Nathanail stated that the Environmental Agency would not give permission to raise the water table. They would also not allow for deposit of landfill but possibly additional layers for clean soil. Parish Council stated that this would be considered as a remediation option if it came to that.

Cllr Boyle informed everyone that SDC are conducting a consultation about play areas across the district. It could highlight the Valley Pleasure Ground as a play area in need. They may also be able to match funding to £10,000.

A resident asked if the insurance company would provide public liability cover if the contamination is a low risk?

We need to wait for the final report and then discuss with the insurers.

Cllr Morris-Wyatt thanked everyone for attending and for the spirit of the meeting.

All reports that have been referred to will be made publicly available. He takes onboard the comments regarding overdue updates. If there are anymore comments please contact the Kate, the clerk.

The next meeting will be to discuss the outcome of the report and what can be done next.