

**Our ref:** RA/2025/148479/01-L01  
**Your ref:** 2025/90517

**Date:** 01 July 2025

**OUTLINE APPLICATION, INCLUDING THE CONSIDERATION OF ACCESS AND LAYOUT, FOR TWO COMMERCIAL UNITS (USE CLASS B2 AND/OR B8) AND ASSOCIATED WORKS – LAND OFF FORGE LANE, THORNHILL LEES, DEWSBURY**

Thank you for consulting us on this application which we received on 25 June 2025.

**Flood risk standing advice – advice to LPA**

The proposed development falls within Flood Zone 2, which is land defined in the [planning practice guidance](#) as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>.

We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted for our comments in relation to flood risk.

**Historic Landfill – advice to applicant/ LPA**

The proposed development is located on or within 250m of a historic landfill site.

We deem these as historic landfills because these sites stopped operating prior to the Environment Agency (EA) coming into operation in 1995. All land that may be classed as contaminated under section 2A of the Environmental Protection Act (EPA) 1990 is looked after by the Local Authority. There is no EA environmental permit in place, but this does not mean that the land is not contaminated. The local authority might have more information regarding these sites.

The developer may wish to carry out, or the planning authority may wish to require, further risk assessment. This may want to include a stability risk assessment to consider any potential sediment issues or slope instability. There may also be the potential for landfill leachate to exist, which would need to be assessed and managed. Further guidance is available on gov.uk webpages.

### Landfill Gas

You should check with your Environmental Health team to understand if further information is available and if landfill gas is a concern in this area. They should also be able to advise what assessments are required.

Landfill gas primarily consists of methane and carbon dioxide, along with trace amounts of other organic compounds. It is produced as the waste in the landfill site degrades. Methane can present a risk of fire and explosion. Carbon dioxide can present a risk of asphyxiation or suffocation. The trace constituents of landfill gas can be toxic and can give rise to long and short term health risks as well as odour nuisance.

The risks associated with landfill gas will depend on the controls in place to prevent uncontrolled release of landfill gas from the landfill site. Older landfill sites may have poorer controls in place and the level of risk may be higher or uncertain due to a lack of historical records of waste inputs or control measures.

Development on top of or within 50m of any site that accepted hazardous or non-hazardous waste should be considered very carefully, as even with appropriate building control measures in place, landfill gas can accumulate in confined spaces in gardens (e.g., sheds, small extensions) and can gain access to service pipes and drains where it can accumulate or migrate away from the site.

The following publications provide further advice on the risks from landfill gas and ways of managing these:

- Waste Management Paper No 27
- Environment Agency LFTGN03 'Guidance on the Management of Landfill Gas'
- Building Research Establishment guidance – BR 414 'Protective Measures for Housing on Gas-contaminated Land' 2001
- Building Research Establishment guidance – BR 212 'Construction of new buildings on gas-contaminated land' 1991
- CIRIA Guidance – C665 'Assessing risks posed by hazardous ground gases to buildings' 2007

If you need any clarification or further information, please contact me.

Yours sincerely