

<b>Consultation Response from: KC Environmental Health (Pollution &amp; Noise Control)</b>		
<b>2025/91078 Land adjacent to 480 Halifax Road, Hightown, Liversedge, WF15 8DX</b>		
<b>Discharge of details reserved by condition 10 (Phase II Intrusive Site Investigation Report) of previous permission 2024/92529 for erection of 3 dwellings and associated works</b>		
<b>Responding Date:</b> 22 <sup>nd</sup> May 2025	<b>Responding Officer:</b> SR	<b>Responding Ref:</b> WK202512996
<b><u>Comments</u></b>		
<p><b><u>Condition 10 (Phase II Intrusive Site Investigation Report)</u></b></p> <p>We were asked for comments on the original application 2024/92529, in our response dated 26<sup>th</sup> of November 2024, we reviewed a Phase 1 Environmental Desk Study &amp; Coal Mining Risk Assessment by RGS, dated the 28th of August 2024, ref: C4499/24/E/6873. At that time, we made clear recommendations regarding the possible shallow coal at the site and the need for an intrusive investigation, specifically:- <i>“The report has not addressed the combustion risk associated with shallow coal; we anticipate this will be updated in future reports. We require any future reports to comment on the coal situation at site and update the conceptual site model accordingly.”</i></p> <p>In support of the current application a Shallow Mining Investigation by G&amp;M Consulting, dated 21<sup>st</sup> of January 2025, Ref C723/01/ATS has been submitted. The report includes Drillers Records in Attachment C. Environmental Health do not comment on geotechnical reports relating to land stability. However, there is a cross over between the Coal Authority and Environmental Health when shallow coal (mine gas or combustibility), may affect a site. We have reviewed the report in regard to contaminated land only.</p> <p>The report informs fieldwork was undertaken on the 14<sup>th</sup> of January 2025 comprising three rotary open boreholes, drilling was undertaken using water flush and they were backfilled on completion. During drilling, monitoring observed no significant concentrations of methane, carbon monoxide or hydrogen sulphide. The results are summarised in the table within section 4. We are unsure as to why the shallow 100mm coal layer observed in BH3 at a depth of 1m below ground level (bgl), has not been included in the table.</p> <p>We are informed that no evidence of soft or voided strata, or significant loss of flush was noted during the drilling.</p> <p>Whilst we acknowledge the report we have concerns that the shallow coal at 1m bgl has been discounted, we also note that the borehole record at BH3 demonstrates “Fill” in the top 0.5m of depth, with no other annotation. The report is not a Phase 2 intrusive investigation, it has not provided an updated conceptual site model for the development site and has not considered the risk from fill material and shallow coal (combustion).</p>		
<b>Recommendations</b>		
<b>Condition 10 (Phase II Intrusive Site Investigation Report)</b>		

Whilst we acknowledge the information within the Shallow Mining Investigation by G&M Consulting, dated 21st of January 2025, Ref C723/01/ATS, it does not fully satisfy the requirements of condition 10. Therefore condition 10 must remain.