Consultation Response from: KC Environmental Health (Pollution & Noise Control)

2025/92368 89 Whitcliffe Road, Cleckheaton, BD19 3EA

Discharge of details reserved by conditions 4 (materials), 5 (boundary treatments), 6 (Phase I Desk Study Report), 7 (Phase II Intrusive Site Investigation Report), 11 (bird/bat roost box), 12 and 13 (intrusive investigations) on previous permission 2023/92066 for erection of two semidetached dwellings with associated alterations

Responding Date: 4th November 2025	**Responding Officer:** SR	**Responding Ref:** WK2025

Comments

This response is in relation to conditions 6& only which are within the remit of Environmental Health.

Condition 6 Phase I Desk Study Report

In support of the discharge of condition 6 a Geo-environmental Ground Investigation Report by Geo Investigate, ref: G25122, dated May 2025 has been submitted. The report contains geotechnical information, which is beyond the remit of Environmental Health, this response relates to contaminated land only. We have reviewed the report and make the following comments and recommendations.

The report informs the current garden land is to be utilised to develop residential properties. Anticipated geology and BSG borehole results nearby demonstrate, sandstone bedrock belonging to the Pennine Lower Coal Measures probably present, commencing from shallow depth, with generally show thin topsoil or made ground deposits over sandy boulder clay with sandstone bedrock generally commencing from depths of between 1m and 2m.

The site history and environmental setting since 1854 have been listed, with nearby industrial development. a site walkover was conducted during the site investigation on the 10th of April 2025, informing: *no obvious evidence of physical hazards or odours, staining, or residues that might be indicative of the presence of chemical (including hydrocarbon) contamination. On the basis of the walkover inspection only, the risk of a serious contamination hazard occurring at this site would be assessed to be very low given the current condition of the site and use.*

The Coal Authority's (CA) CMRA and Coal Mining Report informs worked shallow coal may impact the site.

Potential Human Exposure Pathways are presented in the report, confirming further intrusive investigation is required to confirm contamination analyses and ground gas monitoring.

Condition 7 Phase II Intrusive Site Investigation Report

In support of the discharge of condition 7 a Phase 2 Intrusive Site Investigation Report by Geoinvestigate Limited, dated May 2025, ref: G25122 has been submitted. The report contains geotechnical information, which is beyond the remit of Environmental Health, this response relates to contaminated land only.

A ground investigation comprised Three boreholes were undertaken at the site to depths of

between 2.60m and 2.80m below ground level (bgl) with associated soil sampling. Two rotary open hole boreholes undertaken to depths of between 19.20m and 30.00mbgl, two hand excavated trial pits to provide additional information on near-surface ground conditions, and to collect additional samples for contamination analysis, including from proposed soft landscaping and/or garden areas. The installation of three ground gas monitoring wells in boreholes BH1, BH2 and BH4.

Ground conditions are presented in section 3.1. The natural strata below the made ground (topsoil) comprised initial horizon of firm, sandy and gravelly clay with fine to coarse gravel constituents of sandstone and coal. This stratum extended to depths of between 0.30m (BH2) and 1.40m (BH2). Below this initial clay a thin lens of extremely weak poor-quality coal and was found at depths between 0.90m (BH3) and 1.60m (BH2). Extremely weak, weathered mudstone bedrock commenced below the coal and extended to the base of each borehole where they met refusal at depths between 2.60m (BH2) and 2.80m (BH1 & BH3). No groundwater was observed during exploration.

No broken/weak ground or voids were encountered during the drilling process but a thin band of coal 200-300mm thick was encountered in both boreholes at 13.40m (RH1) and 13.50m (RH2). The results of the gas monitoring visits at the site are presented in Table 4, the report informs monitoring included periods of falling pressure and six visits were undertaken. Methane was below detectable limits, carbon dioxide maximum recoded was 2.5% with gas flow rates below detectable limits, no groundwater was encountered. Gas monitoring results have been calculated within the limits for Characteristic Situation 1 (CS1) classification.

Five samples of topsoil and natural subsoil from a depth of 0.50m recovered from across the site were tested for a range of substances. These samples were tested for a range of substances, depending on their origin, the requirements of the investigation, and the assessment of the attending engineer. Test suites variably included metals/metalloids, PAHs and asbestos. Leachate from two of the samples was analysed also to determine if there might be any risk of mobile contamination, with testing including TPH where appropriate. The results of the contamination testing are included in Appendix 3.

No visual and/or olfactory evidence of contamination was found in any of the encountered soils, including no visible evidence of asbestos contamination. No asbestos was found in any of the samples tested. The analyses have shown elevated concentrations of a number of speciated PAHs. A summary of the exceedances determined during laboratory testing and subsequent assessment are shown in table 2.

The report author informs the exceedances were found in trial pits that will be situated beneath the footprint of the new development with new garden area samples; *TPA and TPB, positioned within garden areas returning acceptable concentrations, therefore indicating that although similar made ground (topsoil) is present across the site, the elevated PAHS are limited to the area within the building footprint, and as such would be confined beneath the building and encapsulated, removing any pathway to the site's end users*. The report author concludes that given the location of the exceedances the site does not represent a significant risk of harm to the end users and can remain in-situ, with the site being deemed suitable for residential use. The report goes on to present the result of 2 samples tested for potential leachate contamination, informing the results demonstrate; *soils at the site have generally*

been shown to not be leaching any potential contaminants at levels that would be expected to have any significant impact on local ground and surface water bodies.

The conceptual ground hazard model is presented in Figure 1; it indicates a low risk to receptors.

The report has stipulated controls on site with regard to ensuring topsoils containing exceedances are covered with hardstanding/building and the applicant is reminded if any contaminated topsoils are to be removed from site they must be treated appropriately, not reused on site and not allowed to contaminate any other site areas or site won materials.

We make the following recommendations.

Recommendations

Condition 6 (Phase I Desk Study Report)

On the basis of the professional judgement of the report author and the evidence and interpretations presented in the Geo-environmental Ground Investigation Report by Geo Investigate, ref: G25122, dated May 2025, Environmental Health have no objection to the discharge of conditions 6.

We remind the applicant that any unexpected contamination encountered during groundworks, must be reported to the LPA, as per the requirements of Condition 9.

Condition 7 (Phase II Intrusive Site Investigation Report)

On the basis of the professional judgement of the report author and the evidence and interpretations presented in the Phase 2 Intrusive Site Investigation Report by Geoinvestigate Limited, dated May 2025, ref: G25122, Environmental Health have no objection to the discharge of conditions 7.