



Our Ref: 251009.CT.01
04 December 2025

Mr R Laybourne,
KPS,
KPS Huse,
Lumley Court,
Chester le Street
DH2 1AN

Re: 251109: Coal Tar Assessment – St Marys Primary School, Shirley Avenue, Gomersal BD19 4NA.

Dear Rob,

Further to your email dated 6 November 2025, we have been requested to undertake a coal tar assessment to determine if the physico-chemical characteristics of potential coal tar materials identified on the site would classify as a hazardous property with regard Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste.

The site comprised an irregular parcel of land, with the main school positioned on the northern and western portions of the site, the eastern and southern areas comprise soft landscaping and hardstanding, used for play areas and playing fields respectively. Car parking and temporary classrooms were present in the northwest of the site.

The site is located in an area characterised by residential dwellings with the eastern and northern boundaries bounded by Shirley Avenue, and the south bounded by Thoresby Drive.

Seven samples of asphalt surfacing obtained from the site on the 27th of October 2025, were submitted for Coal Tar Analysis. to Express Mobile Soil Testing, registered at Retford, Nottinghamshire. An indicative plan showing the location the samples were obtained, is attached in **Enclosure 1** with a copy of the results attached in **Enclosure 2**.

The sample obtained from the playground area within the eastern part of the site (Sample T7), was found to contain <0.10% coal tar with ~0.003% Benzo(a)Pyrene within the Coal Tar fraction. As such surfacing from the playground area within the eastern part of the site, may require disposal to a Hazardous landfill.

The remaining six samples obtained from the access roadway in the northern part of the site (Samples T1 and T2) the footpath area of the playground adjacent south of the school (Sample T6), the car park present within the western part of the site (Sample T3) and the playground area in the south-western part of the site (Sample T4 and T5) were found to not contain Coal Tar.

These results are not guaranteed to be representative of the final waste stream as groundworks may impact/alter the waste stream. During redevelopment, additional analysis of waste materials should be undertaken to ensure materials are adequately characterised under WM3.

Further waste materials including sub-base and/or underlying soils may be generated during works which would require appropriate classification where not already completed.

REL would suggest that an additional 4No. samples of coal tar are recovered from around the location of Sample 9 and analysed to determine with greater certainty the presence of coal tar and / or BaP above the threshold as outlined in WM3. This should be undertaken prior to the excavation / disturbance of asphalt surfacing.

During the removal of hazardous waste there is the potential for any such wastes to mix with underlying or adjacent non-hazardous wastes. As such, surfacing and sub-base materials from the car park and play-areas should be handled and stockpiled separately. Validation inspections would be required prior to off-site disposal to confirm the absence of significant cross contamination. The minimum frequency of any additional testing will need to be agreed with individual landfill operators and must meet the requirements of current UK legislation and guidance.

During remediation and development works, the possibility of residual anomalous conditions must be considered, and attention paid to the inspection of materials that may be exposed.

In the event that suspect materials are encountered, their presence will be subject to further investigation, risk assessment and appropriate treatment as appropriate.

Yours sincerely,



Emily Broughton BSc (Hons) MSc MEnvSc M.I. Soil Sci.

Technical Operations Manager and Principal Geo Environmental Consultant

For and on behalf of Roberts Environmental Ltd

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Enclosure 1



Legend

- Coal Tar Samples
- Soakaways
- Site Boundary

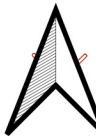
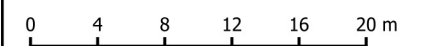


Figure Indicative Coal Tar Sampling and Soakaway Location Plan

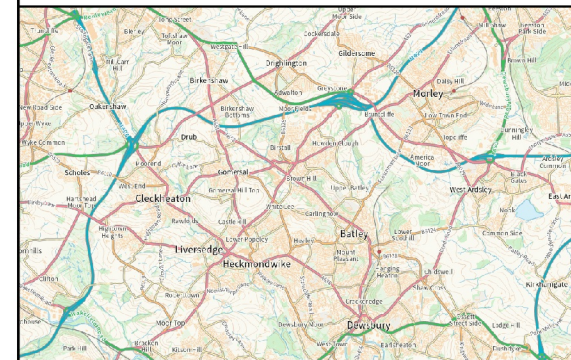
Job Gomersall, St Marys Primary School

Client KPS

Figure No.	Revision	Date
1	1	04 December 2025

Drawn by	Checked by	Scale
CD	MH	1:450.325

Job No. 251009



DO NOT SCALE. NOT FOR CONSTRUCTION

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C:\Users\Roberts-lap-03\Desktop\GIS\gis_user_local (RENAME FOR PROJECT)\gis_user_local (RENAME FOR PROJECT)\01-29-25-67_Site Name.dwg



Enclosure 2

Road Binder Analysis			
Client:	Roberts Environmental	Samples Taken:	27 October 2025
Address:		Samples Extracted:	
		Samples Analysed:	03 November 2025
Contact:		Analyst:	PB
Project:	25 10 04		

					T11595		
Matrix	Sample ID	Phenols Indicator	Coal Tar %	BaP mg/kg			Road Binder Identification
					% BaP	BDF	
Road Binder	T1	NA	ND	1 - 2.4	NA	26	Bit.Binder 97.1 %
Road Binder	T2	NA	ND	1.1 - 2.5	NA	33	Bit.Binder 97 %
Road Binder	T3	NA	ND	0.82 - 1.9	NA	27	Bit.Binder 97.7 %
Road Binder	T4	NA	ND	0.11 - 0.25	NA	52	Bit.Binder 95.2 %
Road Binder	T5	NA	ND	0.16 - 0.37	NA	28	Bit.Binder 96.5 %
Road Binder	T6	NA	ND	0.57 - 1.3	NA	8	Bit.Binder 70 %
Road Binder	T7	ND	<0.1	0.9 - 2.1	~0.003%	NA	Bit.Binder (+ ~0.55% Coal Tar) 99.1 %

QED QC Check OK
Results generated by QED HC-1 analyser

Binder Identification = %match confidence, ND indicates <0.1% coal tar detected, NA = Not Applicable
 Concentration range for % Coal Tar and total BaP in as received sample based on a binder content of between 3% and 7%
 (% Coal Tar) = Approximate % of Coal Tar in Bitumen Binder (% BaP) = Approximate % of Benzo Pyrene in Coal Tar fraction
 Phenol Indicator : NA = not applicable, coal tar not present, ND = not detected, + = detected, ++ detected at high concentration
 Bitumen Degradation Factor (BDF) <100 Undegraded, 100 - 500 Degraded, >500 V.Degraded
 Red highlight = Hazardous : Yellow highlight = Potentially Hazardous

