

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2026/92471 Batley Fire Station, Carlinghow Lane, Carlinghow, Batley, WF17 8DN
Discharge of details reserved by condition 9 (Validation Report) on previous permission 2016/92111 for erection of 13 dwellings with garages, formation of new access road, associated landscaping and lighting
Responding Date:
23/09/2026

Responding Officer:
KB

Responding Ref:
WK202629636

This consultation response relates to Condition 9 (Validation Report) for the former Batley Fire Station on previous permission 2016/92111.

Environmental Health have previously provided a consultation response dated 11th November 2016 (Our Ref: WK/201624608), where we accepted the submission of a Phase 2 Contaminated Land report and Remediation Strategy in support of the above application and recommended that a condition should be applied to any permission granted for the submission of a Validation (now Verification) Report.

We can now acknowledge receipt of a document prepared by Professional Remediation Ltd "20574 Completion Report for the Remediation & Preparatory Works of land at Batley Fire Station (Ref: 20574/NB, dated December 2016) and a subsequent Verification Report written by Calabrian Ltd (Ref: 5062/2 dated March 2017).

The reports include geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the report.

We have now reviewed the submitted reports, and our comments are included below.

Professional Remediation Ltd. 20574 Completion Report for the Remediation & Preparatory Works of land at Batley Fire Station. Ref: 20574/NB, dated December 2016.

The report provides a summary of works carried out at the site, together with supporting photographs, site plans and geotechnical testing information. The report states that the works were undertaken in accordance with a remediation strategy prepared by Calabrian Ltd and records the activities undertaken to prepare the site for redevelopment.

There is confirmation that the site contained areas of made ground impacted by contamination associated with the site's former use, including hydrocarbon contamination in the vicinity of underground storage tanks (USTs) and isolated asbestos fibres within made ground. The works undertaken included demolition of existing structures, excavation and removal of underground obstructions, removal of USTs, treatment and excavation of contaminated materials, regrading of the site and preparation of development platforms. The report also records the discovery and removal of an additional underground tank and a previously unidentified well encountered during the works.

Details are provided of the earthworks including processing of site-won materials and placement of engineered fill. The report includes photographic records of the various stages of the works and provides drawings showing site levels and completed ground preparation works.

The report notes that the remediation works were supervised by Calabrian Ltd and states that a final verification report would be produced separately for submission to the relevant parties.

Comments

Whilst the Completion Report provides a useful factual record of the remediation and development preparation works undertaken, it does not provide sufficient validation evidence to demonstrate that the remediation strategy has been successfully implemented and that the site is suitable for its intended end use.

The report does not provide a clear verification framework demonstrating how each remediation objective set out within the approved remediation strategy has been achieved. There is no validation summary table or verification matrix linking the approved remedial measures to the evidence collected during the works.

The approved Remediation Strategy expressly states that the verification report should include recommendations relating to gas measures and cover materials and should confirm that the remediation and ground preparation works have been carried out in accordance with the approved strategy.

Calabrian Ltd. Verification Report for the Remediation & Preparatory Works of Batley Fire Station. Ref: 5062/2. March 2017.

The submitted report comprises a verification report prepared by Calabrian Limited on behalf of Riva Homes for the redevelopment of the former Batley Fire Station site for 13 residential dwellings. The report was prepared following the completion of remediation and preparatory earthworks undertaken by Professional Remediation Limited under the supervision of Calabrian Limited. The stated purpose of the report is to summarise the remediation works undertaken, document variations from the approved remediation strategy and confirm whether the site has been rendered suitable for the proposed residential end use.

The report reviews the previous Phase 1, Phase 2 and Remediation Strategy documents and confirms that historical investigations identified made ground across the site, localised hydrocarbon contamination associated with an underground diesel tank, asbestos fibres within landscaped bunds, and ground gas conditions resulting in an Amber 1 / CS2 classification. The report notes that the Phase 2 investigation identified elevated petroleum hydrocarbons within groundwater in the vicinity of the diesel tank and asbestos fibres within the made ground in the northern and southern landscaped bunds.

The remediation works undertaken included site clearance, asbestos removal associated with the buildings, demolition works, removal of below-ground obstructions, excavation of the landscaped bunds containing asbestos fibres, removal of underground fuel and water tanks, removal of a previously unidentified well, re-engineering of made ground materials and preparation of development platforms and highway corridors. The report states that asbestos-containing made ground identified within supplementary trial pits TP101 and TP105 was excavated and placed within tank excavations where it would subsequently be isolated beneath hardstanding or beneath a minimum 600mm cover layer.

Verification testing was undertaken following removal of the diesel tank. Five validation samples were collected from the excavation sidewalls and base and analysed for metals,

speciated petroleum hydrocarbons and polycyclic aromatic hydrocarbons. The report states that all results were below the adopted Tier 1 assessment criteria and that no further remediation was required. Additional testing of two samples from the tower tank excavation and groundwater encountered during excavation indicated concentrations below the adopted screening criteria.

The report concludes that the remediation works undertaken “to date” have been completed substantially in accordance with the remediation strategy but explicitly states that the 600mm clean cover system required within garden and landscaped areas had not yet been installed at the time the report was prepared. The report further states that placement of the cover system would occur during the construction phase and that, if instructed, Calabrian Limited would provide independent verification and issue a supplementary verification report.

The report also reiterates the requirement for gas protection measures. Based on the Amber 1 classification and assessment of the monitoring data using the Wilson & Card methodology, the report confirms that the site corresponds to CS2 and recommends installation of a gas-resistant membrane together with passive sub-floor ventilation beneath all dwellings. Detailed construction guidance is provided, however no verification information relating to installation of gas protection measures is included within the report.

Comments

The report provides evidence that remediation measures identified within the approved remediation strategy have been undertaken. This includes removal of the diesel tank, removal of associated contamination, excavation of asbestos-containing made ground within landscaped bunds, removal of below-ground structures and completion of validation sampling from the principal hydrocarbon hotspot. Laboratory analytical results have been included to support the verification of the tank excavation areas.

However, the report also identifies several significant outstanding matters which formed part of the approved Remediation Strategy.

The approved strategy required the provision of a minimum 600mm clean cover system within all gardens and landscaped areas to break pollutant linkages associated with made ground contamination. The submitted Verification Report expressly states that placement of the clean cover had not yet been undertaken and that this work would be completed during the construction phase. Consequently, no verification of materials has been provided. The requirement for a supplementary verification report is acknowledged within the document itself.

The approved strategy also identified a requirement for gas protection measures based upon the Amber 1 / CS2 ground gas assessment. Whilst the submitted Verification Report reiterates the requirement for installation of a gas-resistant membrane and passive sub-floor ventilation beneath all dwellings, no evidence has been provided to demonstrate that these measures have been installed. There are no membrane specifications, layout drawings, installation records, photographic records, integrity testing certificates or independent verification reports relating to the gas protection measures.

Recommendation

Environmental Health has reviewed the submitted information and find that there is insufficient evidence to demonstrate that all elements of the approved Remediation Strategy have been fully implemented and verified. We therefore cannot support the discharge of Condition 9 (Validation Report) at this time.