Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2026/92758 Gomersal St Marys C of E First & Nursery School, Shirley Avenue, Gomersal, Cleckheaton, BD19 4NA		
Discharge of details reserved by conditions 3 (Phase II Intrusive Site Investigation Report), 4 (Remediation Strategy) on previous permission 2026/90937 for redevelopment of school, including demolition of existing buildings; erection of single storey building; external works including provision of hard and soft PE and play spaces; power kiosk, associated landscaping; installation of temporary building during construction		
Responding Date: 22/10/2026	**Responding Officer: KB**	**Responding Ref: WK202632479**

Environmental Health have previously provided a consultation response dated 22nd July 2026 (Our Ref: WK/20262087), where we requested additional Phase 2 intrusive Site Investigation in two stages.

1. Following demolition/removal of the existing EFAB modular building prior to commencement of works to construct the new school building.
2. Following demolition of the existing school buildings identified as EFAC, EFAD and Main School block to ground floor slab level, a Phase 2 Intrusive Site Investigation Report relating to the footprint of these buildings and surrounding areas prior to commencement of works to construct the proposed new playing field and car park.

This response relates to Condition 3 (Phase II Intrusive Site Investigation Report) only. No information has been submitted relating to Condition 4 (Remediation Strategy) at this time.

Condition 3 – Phase II Intrusive Site Investigation Report

We can now acknowledge receipt of a report by Roberts Environmental Ltd (REL) dated 29th September 2025 (Ref: 260732.001.CA).

- Post Demolition Contamination Assessment – EFAB Building St Marys Primary School, Shirley Avenue, Gomersal, BD19 4NA.

The report includes 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 report, and our comments are included below.

The report presents the findings of a supplementary intrusive site investigation undertaken by REL following demolition of the former EFAB modular building at St Mary's Primary School. The purpose of the investigation was to assess ground conditions beneath the former building footprint and address previously identified data gaps associated with areas that had been inaccessible during earlier investigations.

The investigation comprised six exploratory hole locations across the footprint of the former EFAB building. Made ground was identified across much of the site to depths of approximately 0.8m below ground level (bgl). Clay deposits were encountered with coal bands recorded in several locations which is consistent with previous investigations undertaken across the wider site.

No visual or olfactory evidence of contamination was identified during the investigation. Laboratory analysis of soil samples identified no exceedances of the adopted human health assessment criteria for the determinands tested. No asbestos fibres were detected within the samples submitted for analysis. Leachate testing indicated no exceedances of the adopted assessment criteria for controlled waters, with the majority of determinands reported below laboratory detection limits.
Four soil samples were subject to an assessment under Waste Acceptance Criteria and were classified as non-hazardous waste.

The submitted report refines the Conceptual Site Model (CSM) and concludes that no significant source-pathway-receptor pollutant linkages have been identified within the investigated area beneath the former EFAB building. The environmental risk assessment assigns the site a low risk rating and concludes that the investigated area is suitable for its current and proposed educational use.

The investigation addresses the contamination data gap beneath the former EFAB building footprint and confirms that no significant contamination has been identified within the area investigated. The report supports the findings of previous contamination assessments which concluded that contamination risks across the site are generally low.

Comments
The supplementary intrusive investigation undertaken by REL provides additional information for the former EFAB building footprint and addresses one of the specific data gaps identified within previous submissions and Condition 3 (Phase II Intrusive Site Investigation Report).

The investigation confirms that Made Ground is present beneath the former EFAB structure, underlain by clay and shallow coal-bearing strata, consistent with the findings of earlier site investigations. Laboratory analysis identified no exceedances of the adopted human health assessment criteria for open space, no asbestos was detected, and leachate testing did not identify any significant risks to controlled waters. The report concludes that no significant contaminant pollutant linkages have been identified within the area investigated and assigns a low environmental risk rating.

Notwithstanding the above, the report only relates to the former EFAB building footprint and does not address the remaining previously inaccessible areas beneath the footprints of the existing school buildings known as EFAC and EFAD and Main School block. These areas remain uncharacterised and therefore the site investigation cannot currently be considered complete across the entirety of the proposed development site.

The report is also limited to contamination assessment and does not include any additional information regarding the risk from ground gas.

Importantly, the report does not alter the conclusions previously reached regarding the requirement for coal mine remediation works. Previous submissions and the Coal Authority response confirm that stabilisation of shallow mine workings by grouting is required. It has also been acknowledged by the applicant's consultant that post-remediation gas monitoring will be necessary following grouting works to confirm the resultant ground gas regime. The current submission does not provide any information in regards to this matter.

Recommendations

Condition 3 – Phase II Intrusive Site Investigation Report
Whilst we acknowledge the submitted information provides sufficient detail to address concerns surrounding the footprint of the EFAB building, further intrusive investigation remains necessary beneath the remaining buildings (EFAC, EFAD and Main School block) to be demolished and the Condition 3 (Phase II Intrusive Site Investigation Report) should not be recommended for discharge until further information is received.

We would ask for a separate consultation request at this time.