



Public Health and Communities

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Team: Environmental Control (Landfill Gas)

Application Number: 25/00482/FUL

Proposal: Installation of a playzone facility on existing MUGA pitch together with associated fencing, ball stop and flood lighting | Land Opposite Back O Th Moss Community Centre Peel Lane, Heywood, OL10 4TU

Dear Nick,

I have reviewed the document (Soiltechnics report reference STW6378-R02-Rev_A) which has been submitted as part of the application. There are some issues I would like further commentary on.

Paragraph 6.1.1 states that a composite sample of made ground was tested. BS 10175:2011+A2:2017 states that composite samples "*should not normally be used for the investigation of land potentially affected by contamination*" because of the:

- a) *"Difficulty of comparing resultant data with guideline concentrations that relate to spot samples;*
- b) *Possibility of disguising isolated locations of high concentration by mixing with samples of lower concentration;*
- c) *possibility of loss of volatile compounds during the compositing processes;*
- d) *Difficulty of achieving an adequately mixed and representative sample;*
- e) *Difficulty in undertaking statistical analysis of composited data."*

The BS then goes onto say: "*Spatial composite sampling involves collecting at least 25 equally spaced increments of the same size, following a prescribed pattern, over a sampling area (guidance on suitable sampling patterns is provided in an annex in BS ISO 18400-104). The increments are bulked together and thoroughly mixed to form the composite sample. This sample represents the mean quality of the area sampled."*

There is no acknowledgement of this within the report, and no discussion as to how the composite sample was taken, how many increments the composite sample was composed of, or where across the site the increments of the composite sample were taken from.

The fact that there are elevated concentrations of substances detected within the composite sample suggests that there may be a more fundamental contamination issue at this site which has evaded detection due to the sampling approach undertaken (Point b) above states this is a problem with composite samples). An example of the problems (where a contaminated agricultural soil is investigated) is available within the scientific literature [here](#).

I would also question the use of screening values of the residential without plant uptake land-use for children, and would suggest that Public Open Space (Residential) would be a more appropriate screening land-use to use.

Within paragraph 2.7.1, the applicant's consultant in paragraph 2.7.1 states:

“With the development comprising an open and aerated PlayZone pitch, the risk of ground gas to affecting the health of proposed end users of the site is considered low.”

I have reviewed the information available to us on the landfills around the site. There are three landfills around the site; one to the NW (62m), one to the SW (90m), and one to the NE (172m). Of the three, the landfills to the NW and SW are known to have accepted household waste, therefore the generation of landfill gas is possible within both. The landfill to the SW was known to have landfill gas present in 1989, although a follow up monitoring session in 1997 showed that no gas was present. The descriptions of strata provided within the logs indicate that sandy natural soils are present, which are likely conducive to gas migration; the permeability test within WS01 confirms the ground is capable of allowing gas to migrate, albeit at low velocities. In lieu of ground gas monitoring, I am happy to accept suitably designed electrical infrastructure which are resistant to flammable and explosive atmospheres, or a discussion as to why this is not required.

Should any further information not be forthcoming from the applicant, then I would recommend the following condition be placed, should you see fit to approve the development:

“APAS CODE CW041 Preliminary Risk Assessment

Prior to commencement of the development a Phase I Report (Preliminary Risk Assessment) must be completed to assess the actual and/or potential contamination risks at the site. The Phase 1 Report must be submitted to, and approved in writing by, the Local Planning Authority and shall include a desk top study, site walk over, conceptual model, basic hazard assessment and recommendation regarding the need or otherwise for further investigation and risk assessment.

Where the Phase 1 Report has identified potential unacceptable risks, a suitable investigation, risk assessment and remedial action shall be carried out in accordance with details and within a timescale to have first been submitted to and approved in writing by the Local Planning Authority.

In the event that contamination is suspected or found at any time when carrying out the approved development that was not previously identified, or contamination is caused, the Local Planning Authority shall be notified immediately and development affected and potentially affected by the contamination must stop. An investigation and/or risk assessment and/or remediation shall be carried out in accordance with an agreed process

and within agreed timescales to have first been submitted to and approved in writing by the Local Planning Authority. If contamination is not suspected, found or caused during development, this must be confirmed in a completion letter which is subject to the approval in writing of the Local Planning Authority”

If you have any queries, please do not hesitate to reach out.

Yours sincerely,

Jonathon Parr

Jonathon Parr
Environmental Health Senior Officer (Environment Prot)