



Public Health and Communities

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Public Protection and Customers

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Date: 26/08/2025

Team: Environmental Control (Landfill Gas)

Application Number: 25/00837/DOC

Proposal: Submission of details to comply with conditions 3 (Materials), 4 (Architectural Detailing), 5 (Meter Box), 7 (Boundary Treatment), 9 (Hard and Soft Landscaping), 10 (Pre-commencement - Drainage Scheme) and 11 (Pre-commencement - Land Investigation) of planning permission 22/00254/FUL

Dear Majid,

I have reviewed the following documents submitted with the planning application:

- TJ Booth Associates Geo-Environmental Audit Phase 2 Site Investigations Phase 3 Remediation Statement Proposed Residential Development, Trub Road, Castleton, Rochdale, OL11 2WH (report reference rep-tjba-newbuild-trub rd-phs 2_3env-130524.docx).

I agree with the conclusions of the report, and the condition may be discharged.

It should be noted that, whilst Public Health England (now UKHSA) have promulgated the use of the surrogate method, the shortcomings with the approach and the uncertainties (including an under-estimate of the toxicological risk) need to be understood. These issues are outlined by a report produced by SOBRA which is related to human health risk assessments of PAHs. Also, nowhere within the methodology does it state what should happen where there is an exceedance of an individual compound. The exceedance of dibenz(a,h)anthracene is minimal, and is to be located under shallow hard standing, and it is at a depth which is likely to be removed.

I note in the soil analysis screener included with the report submitted, that the applicants consultant use a screening value of 0.3 mg/kg for a land use of residential with or without plant uptake. The S4UL for residential with plant uptake is 0.24mg/kg, and the S4UL for residential without plant uptake is 0.31 mg/kg (both at a soil organic matter of 1%). The screening value utilised within the screener may not be fully protective of human health.

Although outside my remit, the brick infilled basements are likely to be unsuitable for the proposed development and may pose a geotechnical risk should they not be remediated.

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

Yours sincerely,

Jonathon Parr

Jonathon Parr
Environmental Health Senior Officer (Environment Prot)