



Public Health and Communities

Kuama Thompson

Director of Public Health and Communities

Public Protection and Customers

Number One Riverside,
Smith Street, Rochdale, OL16 1XU

Tel: (01706) 924688

Email: jonathon.parr@rochdale.gov.uk

Website: www.rochdale.gov.uk

Date: 22/08/2025

Team: Environmental Control (Landfill Gas)

Application Number: 25/00831/DOC

Proposal: Submission of details to comply with condition 5 (Contamination land verification report) on planning permission 24/01006/VRCON | Land Off Damson Green / Baytree Lane Middleton M24 2UL

Dear Anna,

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

- i2 Analytical Services Analytical Report, Number 25-036861, and;
- GeoAssist Ltd Soils Risk Assessment Screener.

The submitted soil testing results and screener would indicate that the imported soil is clean. However, I have one query and several informatives related to the supplied documentation:

Query

The original application was 24/00306/FUL. A Phase II Contaminated Land Risk Assessment was submitted as part of this application. The conclusion of this report is that a remediation strategy is not required as on-site soils "...present a low risk to both, site end user receptors and the wider environment..." (Section 12 of GeoAssist report reference 6143/VBL-CLRA v1.00). This same section then goes onto state:

"It is the duty of the developer to maintain adequate lines of evidence that imported soils are suitable and failure to provide the necessary evidential information such as waste transfer notes, photographs, delivery notes for imported soils ..."

Further guidance on the evidence which may need to be included are contained within [local authority guidance](#) which relates to the verification of cover systems, but can be adopted to cover imported soils using a similar methodology. I would expect to see such evidence, as a minimum, to contain a provenance of the imported soil (with any available test results from the soil supplier, if available), a statement or plan outlining where the imported soils were placed and to what depth, as well as engineering logs and photographs from the (assumed) hand dug pits where the samples were taken from. This is particularly the case where no remediation strategy is available, and we do not know

which soils have been removed and where on the site the imported soils have been placed. None of this has been presented. Although the soils do not appear to pose a risk from the evidence provided so far, what has been submitted is currently unacceptable from a best practice position and does not accord with GeoAssist's statement regarding lines of evidence (GeoAssist report reference 6143/VBL-CLRA v1.00, as quoted above). **Until this evidence is forthcoming and has been accepted, I would not recommend discharging the condition at this time.**

Informatives

The below comments are general in nature, and do not affect the above recommendation, given that all concentrations detected are below the relevant GAC for the substance/compound mentioned below. They are for information only.

- There is an Atkins AtRisk concentration for barium;
- The C4SL for cadmium is 22 mg/kg;
- GeoAssist have derived their own criteria for mercury (inorganic). Their derived GAC is 199 mg/kg, whereas the S4UL is 40 mg/kg. Should soil concentrations be close to the S4UL, I would anticipate a detailed explanation of their methodology in deriving this GAC to ensure their value is protective of human health;
- The S4UL for phenol is 120 mg/kg. See errata no. 16 here: [FAQ S4UL version1.6a Final.pdf](#) and replacement pages here: [Errata S4UL version1.1.pdf \(SECURED\)](#);
- GeoAssist have derived their own criteria for selenium. Their derived GAC is 434 mg/kg, whereas the S4UL is 250 mg/kg. Should soil concentrations be close to the S4UL, I would anticipate a detailed explanation of their methodology in deriving this GAC to ensure their value is protective of human health;
- The following PAHs have not been assessed as a screening value has not been provided: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-c,d)pyrene. Some of these PAHs are of particular concern, and I would expect concentrations ascertained from testing to be compared to a GAC. S4ULs are available for all of these compounds.
- A C4SL for naphthalene has been recently published.

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

Yours sincerely,

Jonathon Parr

Jonathon Parr
Environmental Health Senior Officer (Environment Prot)