

Memo

To: Poppy Oakey (Eden Planning)

From: Curtins

Subject: HALSNEAD FARM

Reference: 087052-CUR-XX-XX-T-GE-00004-P01

Date: 10 April 2026

Curtins received correspondence from the Environmental Health & Consumer Protection officer (Helen Brashawe), in response to the planning submission of Geo-Environmental reports to assist planning.

The following memo provides response to LPA correspondence ahead of the application to discharge Conditions attached to planning permission 26/00617/FUL and 26/00173/PLANNI. The following correspondence will be set out as a point to point update where necessary, Environmental Health & Consumer Protection officer notes, with Curtins replies in **green**.

The aforementioned Environmental Health & Consumer Protection officer correspondence states:

Ground Investigation

1. The Phase 2 Ground Investigation does not include coverage in several key areas and therefore does not fully characterise the site:
 - **Northern Area:** No intrusive investigation beneath existing agricultural buildings and hard standing; no targeted investigation at the location of the recorded tank; and no direct investigation within the area of the infilled pond.
 - **Southern area:** Only limited investigation has been undertaken where dwellings remain in situ.

Curtins GI location design was undertaken in areas of the site available at the time of the investigation.

- *The area to the north was not investigated due to the presence of overhead power lines restricting works being undertaken beneath on health and safety grounds, and the location of existing buildings being in-use. Machinery/Rigs are to be at least 9m horizontally from overhead powerlines and not extend more than 3.6m into the air in the vicinity of overhead powerlines (within 15m) .*
- *As you maybe aware the resident in the property along the southern boundary was very aggressive during the GI works, to the point that a dog was let out onto the fields while work was being undertaken. This resulted in locations being relocated away from this property to avoid further aggravation and aggregation towards operatives on site.*

The commentary above has been included within an Updated Phase 2 Report.

2. Further intrusive investigation is required following demolition of the northern buildings/hard standing and the southern dwellings, together with targeted investigation of the tank and former pond location, to confirm the presence/absence and contamination status of Made Ground, assess any localised contamination, and validate ground-gas conditions in these areas.

Post-demolition Investigations can be undertaken following demolition of the northern buildings/hard standing and the southern dwellings, alongside historical features located around the northern stable buildings mentioned.

This has been included as a recommendation within an Updated Phase 2 Report.

Ground Gas Assessment

3. The ground gas monitoring was undertaken over a 10-week period between late July and late September 2025. With reference to CIRIA C665, monitoring should capture a range of barometric conditions, including worst-case scenarios (low and falling atmospheric pressure).
4. The monitoring visits recorded rising or steady pressures only throughout the programme. Additional justification is required to demonstrate that the dataset is representative of worst-case conditions (see also Point 6 below).

Upon further review of the barometric conditions, the section of the report has been updated, noting the barometric states and the range of barometric conditions encountered. Low and falling barometric pressures were encountered during the monitoring regime

The commentary above has been included within an Updated Phase 2 Report.

Coal Mining Risk Assessment

5. Review of the submitted Phase 1 Preliminary Risk Assessment and Phase 2 Ground Investigation Report has identified significant inconsistencies and factual discrepancies within the Coal Mining Risk Assessment sections of both reports. These include: contradictory statements regarding the presence of past shallow coal mine workings beneath the site, inconsistent descriptions of underground workings, and confusion between on-site and off-site mining features, some of which do not align with the Mining Remediation Authority mapping or the Consultants Coal Mining Report appended to the assessment. In addition, the narrative relating to spontaneous combustion does not appear to be consistent with the described geological setting.

A review of the relevant sections has been undertaken across both reports, and updates made accordingly to both the Phase 1 Preliminary Risk Assessment and Phase 2 Ground Investigation Report.

6. To ensure the assessment is robust and internally consistent, the coal-mining sections of both the Phase 1 and Phase 2 reports should be reviewed and amended so they accurately reflect the Mining Remediation Authority data and the findings presented elsewhere in the documents. Reference should be made to guidance provided within Good Practice for Risk Assessment for Coal Mine Gas Emissions, CL:AIRE, October 2021 to inform the risk assessment. Revised versions of the Phase 1 and Phase 2 reports addressing these discrepancies are required.

A review of the relevant sections has been undertaken across both reports, and updates made accordingly to both the Phase 1 Preliminary Risk Assessment and Phase 2 Ground Investigation Report.

Materials Management Plan

7. Earthworks are required across the site, including significant cut and fill operations. Where site-won soils are to be re-used within the development, the management of these materials must be undertaken in accordance with the CL:AIRE Definition of Waste: Development Industry Code of Practice. An approved Materials Management Plan (MMP), supported by a Qualified Person (QP) Declaration, will therefore be required prior to commencement of earthworks, together with a Verification Report upon completion.

Curtins have not been instructed to undertake an Earthworks specification as this time.

8. The submitted Noise Impact Assessment (Hepworth Acoustics, November 2025) refers to earth bunding forming part of the landscaped public open space with a height of 4 metres. Any materials proposed for the 4-metre landscaped bund must be appropriately characterised and included within the MMP scope

Noted

Geotechnical Matters

9. Merseyside EAS does not provide advice on geotechnical matters; advice should be sought from relevant technical specialists.

Noted

Additional note for correction in revised reports

10. The Phase 1 Executive Summary includes reference to the Royal Bolton Hospital Maternity Unit in the UXO section; this appears to be a drafting error and should be removed to avoid confusion.

Amended – updated Phase 1 PRA accordingly.