

**Consultation Response from: KC Environmental Health (Pollution & Noise Control)**
**2025/90387 - Site of Former Perseverance House, St Andrew's Road, Huddersfield, HD1 6RZ**
**Discharge of details reserved by conditions 3 (Phase I Desk Study Report), 4 (Phase II Intrusive Site Investigation Report), 10 (materials), 12 (drainage strategy), 13 (temp surface water strategy), 15 (interceptor details) on previous permission 2024/91336 for erection of two storey office/workshop with detached store and associated works**
**Date Responded:**  
**6<sup>th</sup> March 2025**
**Responding Officer:**  
**NH**
**Responding Ref:**  
**WK/202504805**

Conditions 10, 12, 13 and 15 are outside the remit of Environmental Health.

**Condition 3 - Phase I Desk Study Report**

A Phase 1 Environmental Desk Study Report by RGS (27th September 2024, C4483/24/E/6940) has been received in support of the application to discharge Condition 3. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspect of the report.

A site walkover was conducted on 16th September 2024. The site comprises an area of disused brownfield land with two large shipping containers located in the southwest corner of the site. A number of spoil heaps of assumed demolition material were observed on the site. Historically, Turnbridge Chemical Works and mills were located onsite. Surrounding land uses within 100m include numerous works, mills, and features that are potentially contaminative. The site is in a coal mining area as defined by the Coal Authority. There is a historic landfill within 250m of the site. Several areas of made ground and infilled ground have been identified within 250m of the site.

Table 7 of the report contained a preliminary risk assessment and conceptual site model. Several potential pollutant linkages have been identified, including risks from ground gases and contaminated soils. For these reasons, RGS has recommended an intrusive investigation. It is proposed that this includes three sampling locations, including the retrieval of soils for chemical analysis. RGS also proposes ground gas monitoring in accordance with good practice guidance.

We accept the Phase 1 Environmental Desk Study Report by RGS (27th September 2024, C4483/24/E/6940) and recommend that Condition 3 is discharged.

**Condition 4 - Phase II Intrusive Site Investigation Report**

A Report on a Phase 2 Geo-environmental Investigation by RGS (February 2025, C4483/24/E/6941) has been received in support of the application to discharge Condition 4. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspect of the report.

The report explains that fieldworks were undertaken on the 27th November 2024. The activities included the drilling of three windowless sample boreholes, the installation of three gas monitoring standpipes, and one machine-excavated trial pit. Gas monitoring standpipes

were installed at depths between 1.0m and 2.5m in all boreholes, with installation details recorded on the appropriate borehole logs.

The site geology consists of concrete over made ground (both granular and cohesive), followed by alluvium. Variable granular and cohesive made ground was encountered to depths of 2.0m, except at WS02, where an obstruction was encountered at 1.0m depth. Several hydrocarbons were found to be present in the soils, but RGS consider it unnecessary to undertake specific remediation. Additional justification is provided in section 11 of the report.

Gas monitoring results indicated a maximum concentration of 0.1% methane, with carbon dioxide concentrations ranging between 0.1% and 0.2%, and oxygen levels between 21.1% and 21.4% v/v. These readings were taken at atmospheric pressures between 974mb and 1031mb. A total of four monitoring visits were conducted over a one-month period. Based on these results, RGS have characterised the site as Characteristic Situation Level 1.

RGS note that any fill material, whether site-won or imported, to be used at the site should be subjected to an assessment to determine its suitability.

We have read and accept the Report on a Phase 2 Geo-environmental Investigation by RGS (February 2025, C4483/24/E/6941). We generally accept the report. However, can the consultant confirm whether testing was undertaken on the stockpiles of suspected demolition material reported in the Phase 1 report (27th September 2024, C4483/24/E/6940)? We also require clarification as to whether the stockpiles remain onsite. For these reasons, we recommend the condition remain until further notice.

### **Recommendations**

#### **Condition 3 - Phase I Desk Study Report**

We accept the Phase 1 Environmental Desk Study Report by RGS (27th September 2024, C4483/24/E/6940) and recommend that Condition 3 is discharged.

#### **Condition 4 - Phase II Intrusive Site Investigation Report**

We have read and accept the Report on a Phase 2 Geo-environmental Investigation by RGS (February 2025, C4483/24/E/6941). We generally accept the report. However, can the consultant confirm whether testing was undertaken on the stockpiles of suspected demolition material reported in the Phase 1 report (27th September 2024, C4483/24/E/6940)? We also require clarification as to whether the stockpiles remain onsite. For these reasons, we recommend the condition remain until further notice.