

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2025/90515 - Greenside Mill, Savile Road, Skelmanthorpe, Huddersfield, HD8 9EE
Discharge of details reserved by condition 9 (Remediation Validation Report) on previous permission 2018/91787 for outline permission for demolition of existing buildings and structures and erection of residential development
Date Responded:
 2nd May 2025

Responding Officer:
 NH

Responding Ref:
 WK/202510527

Condition 9 - Validation Report

Further to our comments dated 17th March 2025, we have received a Risk Assessment and Validation Report by MDJA (8th April 2025, ADJ/DJM/11466). The report includes geotechnical information, which falls outside the scope of Environmental Health. As such, this consultation response focuses solely on the land contamination aspects of the report.

MDJA have undertaken additional testing and reporting to address concerns regarding remediation at the site. The additional testing included surface sampling across the site (excluding the area of the pond). Locations were chosen in the rear gardens of the plot currently accessibly. These were Plots Plots 1, 3, 7, 8, 17, 20, 23, 24, 28, 38 and three samples of Public Open Space (POS). The western site was inaccessible due to stockpiled material and hardstanding. MDJA propose additional testing in this area in due course. MDJA have added that this is to make a preliminary assessment of the level of any contamination on the site in order to determine if there was any remaining risk in respect of both human health and the environment

From the chemical analysis undertaken on the samples, all the results for the metals fell within their Maximum Permitted Concentrations (thresholds) for a residential enduse (with home-grown vegetables). One result for Benzo(b)fluoranthene exceeded the threshold for garden areas. However, the sample (POS2) was of future Public Open Space, and fell within the threshold for Residential POS of 7.1 mg/kg. Two results for Dibenz(a,h)anthracene marginally exceeded the threshold for a residential end-use. However, these were also from POS. Only one result exceeded the threshold for Residential POS of 0.57 mg/kg, recording 0.91 mg/kg.

Loose Asbestos fibres of Chrysotile were recorded in three of the samples. Gravimetric analysis of the samples returned values of <0.001% w/w, 0.002% w/w and 0.026% w/w. One of the samples contained insulation board. The asbestos content comprised Chrysotile and Amosite and represented 0.001% w/w.

MDJA consider there to be 'no clear pattern as to the spread of asbestos across the plots and POS areas tested' and maintain the recommendations of Sirius, in that where asbestos impacted Made Ground is present within 1m of finished ground levels. An additional 150mm granular hard-dig layer or geotextile separator is provided below the 600mm topsoil and sub-soil clean cover i.e. the existing Remediation Strategy continues to be adopted. To minimise future costs, MDJA also recommend that Made Ground is stockpiled separately from clean excavated soils, as the latter are very unlikely to be contaminated by ACM's.

We have read the report and note the preliminary investigation of the site. Whilst the report provides a preliminary insight into the site since works commenced, and confirms the

presence of contamination there is little justification in the sampling methodology, description of the site in its current form and the report does not fully characterise all potential risks across the whole development site as parts were inaccessible. We therefore maintain our previous recommendations as dated 17th March 2025, in that this condition should remain. The applicant should address the outstanding contaminated land conditions on the concurrent application before proceeding with this application, in order to meet the condition requirements.

Recommendations

Condition 9 - Validation Report

For the reasons above, to ensure safe development and occupation of the site, we recommend that contaminated land condition 9 remain until further notice.