

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2025/90695 - former Deighton Centre, Deighton Road, Deighton, Huddersfield, HD2 1JP
Discharge of details reserved by condition 13 (Phase II Intrusive Site Investigation Report) on previous permission 2023/93350 for development of former Deighton Centre (previously Deighton High School) for Social Emotional and Mental Health School (class F1) comprising single and two storey educational buildings; roof mounted photo-voltaic panels; sensory garden spaces; multi-use games areas; landscaping; hardstanding areas; carparking; access with secure fencing and ancillary development
Date Responded:
20th May 2025

Responding Officer:
NH

Responding Ref:
WK/202512090

Condition 13 - Remediation Strategy

Further to our comments dated 7 April 2025 (Ref: WK/202507975), we have reviewed the revised Remediation Strategy and Verification Plan prepared by IDOM (dated 15 April 2025, Ref: RSVP-25049-25-94 Rev A). 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 updated report builds upon previous assessments and incorporates supplementary ground investigation, soil chemical analysis, and ground gas monitoring undertaken by IDOM in March 2025. The investigation identified elevated concentrations of polycyclic aromatic hydrocarbons (PAHs) and asbestos (quantified at 0.008% w/w). Ground gas monitoring confirmed a Characteristic Situation 1 (CS1), indicating low risk from hazardous ground gases.

The remediation proposals remain largely unchanged from the earlier version. Two options are presented in Table 6:

- Option 1: Full removal of contaminated made ground to natural subsoils, followed by verification testing and reinstatement with imported clean material.
- Option 2: Reduced level excavation and installation of a clean cover system.

Clean cover depths are specified in the report according to land use, ranging from 300 mm for to 1000 mm. The strategy also includes an asbestos management plan and outlines validation protocols for imported soils in accordance with YALPAG guidance. A verification report is to be submitted post-remediation to confirm remediation has been undertaken in accordance with the proposals.

Comments

We have considered the report provided. Based on the findings and recommendations in the revised strategy, we support Option 1 from Table 6 only. That is, the full removal of made ground to natural subsoils and additional verification testing to confirm the absence of elevated contaminants, followed by the placement of imported clean material proven suitable for use.

This is because the investigation identified widespread contamination (PAHs, lead, asbestos, coal tar), and the remediation proposals appear to be focused on more on landscaping rather than human health. We consider there to be insufficient clarity on access controls to areas or

exposure pathways for food grown on site, and Option 2 lacks full justification - particularly concerning given the sensitive school setting.

In line with LCRM guidance, a remediation options appraisal should culminate in the selection of a final, fully justified remediation strategy. Before discharging this condition, we recommend that the planning officer seeks written confirmation of the final remediation option selected by IDOM and considers our comments outlined above.

Recommendations

Condition 13 - Remediation Strategy

Before discharging this condition, we recommend that the planning officer seeks written confirmation of the final remediation option selected by IDOM and considers our comments outlined above. Until then, Condition 13 should remain.