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: 7th April 2025	**Responding Officer:** NH	**Responding Ref:** WK/202507975

Condition 13 on previous permission 2023/93350 requires the submission and approval of a remediation strategy. This is wrongly described in the application description.

Condition 13 - Remediation Strategy

A Remediation Strategy and Verification Plan by IDOM (March 2025, RSVP-25049-25-94) has been received in support of the application to discharge Condition 13. 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.

We have read the report provided and require clarification. Remediation is required at the site due to the presence of elevated concentrations of lead, several polycyclic aromatic hydrocarbons (PAHs), and asbestos. The first option proposed by IDOM is the removal of made ground down to the natural subsoil, visual inspection and testing, followed with the placement of imported material. The second option is to reduce site levels to accommodate clean cover systems of varying depths that sometimes include a geotextile separator, and use clean site won or imported material to make up minimum depths of 300 -1000mm of soil (or minimum depth specified by landscape architect). These vary by land use and planting scheme.

We do not accept the report for the reasons provided below:

1. In Section 6.2.2 of the report, IDOM refer to site won made ground as ‘unsuitable for reuse’. The reuse of site won soils is referred to in the text (e.g. Table 6). This is unclear and requires further comment.

2. In Table 6, two proposals are given based on land use/planting scheme. These include visual inspection of natural formation subsoils at one sample per 250m^3. How has this sampling frequency been derived?

3. Again, in Table 6, varying depths of clean cover are referred to (300mm-1000mm) with the addition of ‘or minimum depth specified by landscape architect’. The report does not appear to provide additional commentary as to how these depths have been settled on and the risk to human health. The same can be said for the placement of a geotextile membrane that has been proposed for some land uses. This needs to be addressed and we expect a revised conceptual site model to be provided in accordance with good practice guidance.

4. In Section 9 of the report, the proposals for the validation of clean cover is provided. Specifically in Section 9.1.3 of the report they do not appear to align with the testing frequency specified in YALPAG Guidance - Verification requirements for cover systems (version 4.1, June 2021). We expect these to be in alignment with good practice guidance.

5. We require clarification in relation to the existing woodland soils where in Table 6 it reads:

   'Quality of existing soils unknown and is identified as a potential constraint to remediation if needed given root protection requirements – assess existing upper 100 mm of soils @ one sample per 250 m^2 against chemical acceptance criteria and undertake risk assessment.'

Recommendations

Condition 13- Remediation Strategy

We do not accept the Remediation Strategy and Verification Plan by IDOM (March 2025, RSVP-25049-25-94) and require additional information. For these reasons, Condition 13 must remain until further notice