

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2025/90821 - 41, Ashbrow Road, Fartown, Huddersfield, HD2 1DX
Discharge of details reserved by conditions 3 (Materials), 17 (Phase I Desk Study Report) and 18 (Phase II Intrusive Site Investigation Report) of previous permission 2022/90852 for erection of mixed use development of retreat building and 5 dwellings with integral garages
Date Responded:
23rd April 2025
Responding Officer:
NH
Responding Ref:
WK/202509325

Condition 3 is outside the remit of Environmental Health.

Condition 17 - Phase I Desk Study Report

A Phase 1 Environmental Desk Study and Coal Mining Risk Assessment by RGS (16th May 2024, C4201/24/E/6429) has been received in support of the application, to discharge Condition 17. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the report.

RGS conducted a site walkover on 8th May 2024 and described the site as overgrown with no visible contamination. Historical land uses include agriculture and residential use, with nearby historic features such as reservoirs, quarrying and mills within 250 metres of the site. RGS assigned a low risk of shallow coal workings and mine gas but noted the potential for unrecorded shallow workings. Section 3 in the report provides a conceptual site model and risk assessment, identifying several potential source-pathway-receptor linkages. The report closes with RGS recommending further intrusive investigation to confirm ground conditions and contamination levels. Ground gas monitoring is suggested if significant made ground is encountered during the investigation.

Comments

We have reviewed the Phase 1 Environmental Desk Study and Coal Mining Risk Assessment by RGS (16th May 2024, C4201/24/E/6429) and accept the document in support of the application to discharge Condition 17. Therefore, we recommend that Condition 17 be discharged.

Condition 18 - Phase II Intrusive Site Investigation Report

A Ground Investigation Report by Soil and Structures (21st December 2024, 20459 001 V01) has been received in support of the application, to discharge Condition 18. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the report.

The report describes a limited investigation at the site, as Soil and Structures did not identify any harmful or polluting materials at the time of the site visit. Existing structures including the existing dwelling and dilapidated out buildings also limited the investigation. Two soil samples were taken from the site for chemical analysis to check the suitability for reuse as part of the development. One sample was taken from TP101 at a depth of 0.10-0.15 m and another from TP104 at the same depth.

Both samples contained brown loam and clay with gravel and vegetation. Made Ground deposits were not encountered in any of the exploratory hole locations but it is suggested

these may be encountered beneath existing and former structures and hardstanding. Laboratory analysis revealed elevated concentrations of Polycyclic Aromatic Hydrocarbons (PAHs) to a maximum concentration of 7.2 mg/kg. Soil and Structures state these are likely associated with coal ash. However, further testing is recommended to determine the risks to human health and assess the suitability of the topsoil for reuse.

Comments

We acknowledge the Ground Investigation Report by Soil and Structures (21st December 2024, 20459 001 V01) but agree that additional investigation work is required at this stage. We reserve further comment until a comprehensive intrusive investigation and updated risk assessment are provided to support the application. Therefore, we recommend that Condition 18 remains in place until further notice. Environmental Health should be consulted for comment once new information has been received.

Recommendations

Condition 17 - Phase I Desk Study Report

We have reviewed the Phase 1 Environmental Desk Study and Coal Mining Risk Assessment by RGS (16th May 2024, C4201/24/E/6429) and accept the document in support of the application to discharge Condition 17. Therefore, we recommend that Condition 17 be discharged.

Condition 18 - Phase II Intrusive Site Investigation Report

We acknowledge the Ground Investigation Report by Soil and Structures (21st December 2024, 20459 001 V01) but agree that additional investigation work is required at this stage. We reserve further comment until a comprehensive intrusive investigation and updated risk assessment are provided to support the application. Therefore, we recommend that Condition 18 remains in place until further notice. Environmental Health should be consulted for comment once new information has been received.