

# Letter Consultation Response

**SOIL <sup>AND</sup>  
STRUCTURES**

SR (abbreviation)  
Environmental Health  
Kirklees Council  
Civic Centre 3  
Market Street  
Huddersfield  
HD1 2EY

Our Ref.: 20459-L-001-V01  
Your Ref.: WK202538923  
Date: 22 January 2026

Dear SR,

**Re: 41 Ashbrow Road, Fartown, Huddersfield, HD2 1DX - Planning Application Ref. 2025/90821**

A copy of your consultation response of 05 January 2026 (ref. WK202538923) has been forwarded to

Please find hereafter our response to your comments under respective, consecutive sub-headings for ease of reference.

It is noted that this letter is intended to be read in conjunction with, and as a follow-on to, our *Ground Investigation Report (intrusive) ref. 20459-R-001-V02* dated 11 June 2025. Hereafter, this earlier report is referred to as the 'GIR' for brevity.

#### *Laboratory testing results relating for additional analysis:*

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The laboratory data was included in the Material Suitability – Chemical Screening sheet that was appended to the GIR however the laboratory testing certificate was omitted. Please find enclosed a copy of the testing certificate for your reference and records. The Material Suitability – Chemical Screening sheet is also enclosed for ease of comparison.

#### *The septic tank:*

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The septic tank is located within the red-line boundary but outside of the area being developed (and lies within the garden of the existing retreat centre). The septic tank remains and will not be disturbed as part of any groundworks.

#### *The suitability of the Topsoil deposits for re-use within soft landscaping areas:*

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Three key considerations, that were not borne out within the GIR, are:

- i) The fact that the Site is being developed for two distinct end uses. These end uses include: 5 dwellings with private gardens to the east; and, 1 retreat centre with open space to the west.

*The two areas have distinct risk profiles with respect to human health with the open space (soft landscaping) attached to the retreat centre having a less sensitive risk profile relative to the residential dwellings. More specifically, the retreat centre will be open to adults for short durations and therefore risk profile, exposure duration and frequency to any Topsoil deposits is less than a private residential setting.*

*Based on this end-use scenario, the soft landscaping areas across the proposed retreat can be modelled as public open space near residential housing with specific attention given to the short-duration of stays at the retreat centre.*

*On this basis, the chemical quality of the Topsoil deposits would be considered 'suitable' based on revised screening criteria (Category 4 Screening Levels) of Benzo(a)pyrene and Lead (Pb) being 10 mg/kg and 610 mg/kg. In other words, no exceedances of the Generic Assessment Criteria for this end use are recorded.*

[1]

- ii) The areas where elevated concentrations of Benzo(a)pyrene were recorded (TP101 and TP104) either fall within the footprint of proposed structures (TP104) or will be covered as a result of the earthworks planned as part of the proposed development (TP101).

*The earthworks include excavation (cut) of the existing Topsoil deposits present across the proposed residential dwellings (together with a 'wedge' of bedrock deposits) and placement of this material (filling) along the southern edge of the Site to form an unmanaged (wild) landscaping buffer for the properties to the south of the Site*

- iii) No existing Topsoil will be re-used as part of soft forming material within the residential dwellings.

*The chemical quality of the existing Topsoil deposits does not have a bearing on the proposed residential dwellings noting that the private gardens attached to the residential dwellings will be provided with new, imported Topsoil deposits. More specifically:*

- a) *new soft landscaping areas (private gardens) will be formed on natural sub-soil deposits (weathered bedrock); and,*
- b) *the chemical and physical quality of imported Topsoil is confirmed as being 'suitable' in line with current guidance<sup>1</sup>.*

*As noted in the bullet point above the existing Topsoil deposits present on Site have been, or will be, cut and placed (filled) along the southern edge of the Site to form an unmanaged (wild) landscaping buffer for the properties to the south of the Site.*

*The commencement of groundworks and potential presence of discrete sources of 'ash and clinker':*

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Following submission of the GIR, groundworks on Site have commenced (as acknowledged within the consultation response) that as detailed in the point above, has a direct bearing on the level of risk to human health. Overall, the level of risk presented to human health due to the groundworks completed to date is considered acceptable (very low; uncertainty around the Topsoil's chemical suitability is removed).

It is also specifically noted that no evidence of either potentially harmful or polluting or non-natural soils (*Made Ground; including any 'ash and clinker'*) has been revealed during the groundworks on Site.

If you have any questions relating to this letter, please contact the undersigned.

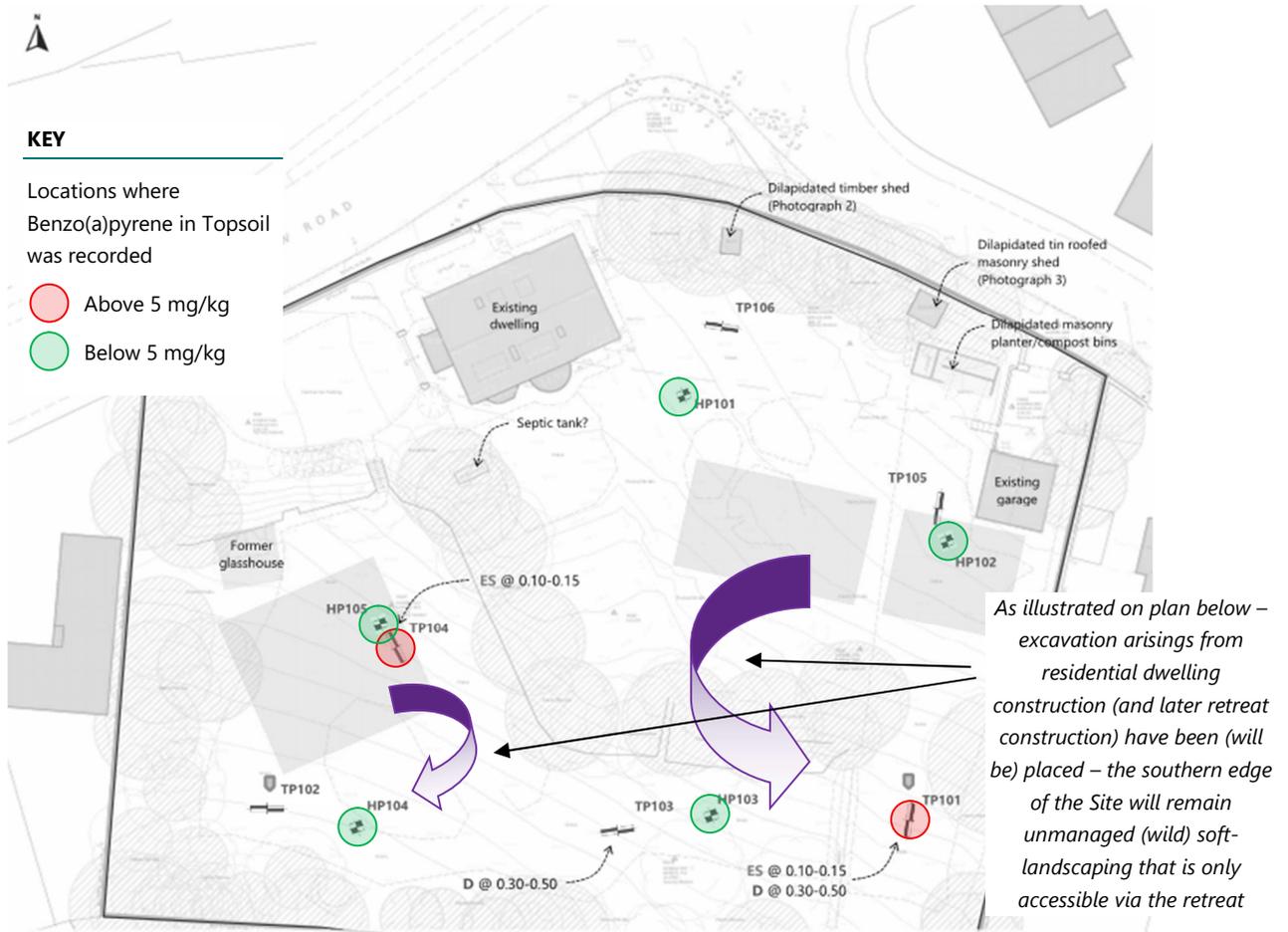
Yours sincerely,

**Russell Bowman**  
Director  
Soil & Structures Ltd

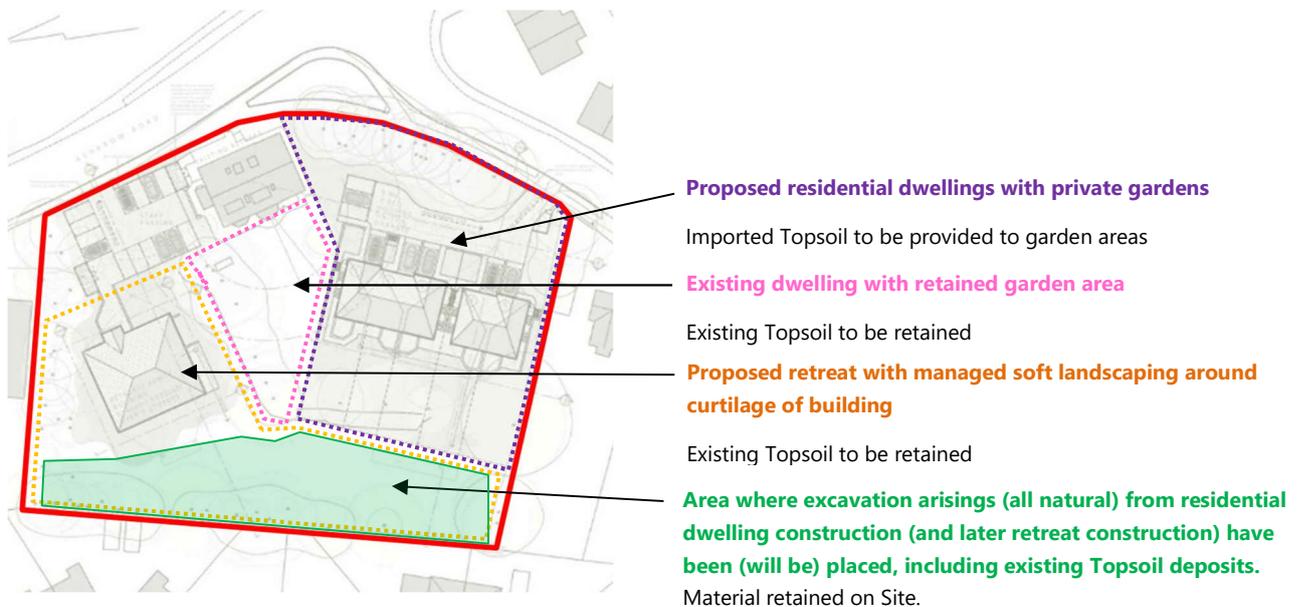
*Enc. Extract of the development plan illustrating the distinct areas  
Photographs from groundworks on Site  
Laboratory testing certificate – Topsoil re-tests (HP101 to HP105)  
Material Suitability – Chemical Screening*

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<sup>1</sup> <https://claire.co.uk/phoca-download/1-publications-library/5-external-documents.html?download=987:a-regulator-s-guide-to-cover-systems-and-their-verification-2024>



Extract from Ground Model – Plan, presented within the Ground Investigation Report (intrusive) ref. 20459-R-001-V02 dated 11 June 2025



Extract from Development Plan, presented within the Ground Investigation Report (intrusive) ref. 20459-R-001-V02 dated 11 June 2025



*Undated photograph from Site illustrating revealed ground conditions (intact bedrock deposits within foundation formations and weathered bedrock in foreground of image and along edges of excavation) with excavation arisings placed along southern edge of the Site.*



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## **Analytical Report Number : 25-028686**

<b>Project / Site name:</b>	Ashbroe Road, Fartown	<b>Samples received on:</b>	02/06/2025
<b>Your job number:</b>	20459	<b>Samples instructed on/ Analysis started on:</b>	02/06/2025
<b>Your order number:</b>		<b>Analysis completed by:</b>	09/06/2025
<b>Report Issue Number:</b>	1	<b>Report issued on:</b>	10/06/2025
<b>Samples Analysed:</b>	5 soil samples		

### **Signed:**

Rachel Chappell  
Key Account Manager  
**For & on behalf of i2 Analytical Ltd.**

Standard Geotechnical, Asbestos and Chemical Testing Laboratory located at: ul. Pionierów 39, 41-711 Ruda Śląska, Poland.

Accredited tests are defined within the report, opinions and interpretations expressed herein are outside the scope of accreditation.

Standard sample disposal times, unless otherwise agreed with the laboratory, are :	soils	- 4 weeks from reporting
	leachates	- 2 weeks from reporting
	waters	- 2 weeks from reporting
	asbestos	- 6 months from reporting
	air	- once the analysis is complete

Retention period for records and reports is minimum 6 years from the date of issue of the final report.  
Some records may be kept for longer according to other legal/best practice requirements.

Any assessments of compliance with specifications are based on actual analytical results with no contribution from uncertainty of measurement.  
Application of uncertainty of measurement would provide a range within which the true result lies.  
An estimate of measurement uncertainty can be provided on request.

Analytical Report Number: 25-028686  
Project / Site name: Ashbroe Road, Fartown

Lab Sample Number	566634	566635	566636	566637	566638
Sample Reference	HP101	HP102	HP103	HP104	HP105
Sample Number	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Water Matrix	N/A	N/A	N/A	N/A	N/A
Depth (m)	0.05-0.15	0.05-0.15	0.05-0.15	0.05-0.15	0.05-0.15
Date Sampled	22/05/2025	22/05/2025	22/05/2025	22/05/2025	22/05/2025
Time Taken	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied
Analytical Parameter (Soil Analysis)	Units	Test Limit of detection	Test Accreditation Status		

Stone Content	%	0.1	NONE	< 0.1	25.2	< 0.1	< 0.1	< 0.1
Moisture Content	%	0.01	NONE	16	13	15	14	12
Total mass of sample received	kg	0.1	NONE	0.6	0.7	0.7	0.7	1

#### Asbestos

Asbestos in Soil Detected/Not Detected	Type	N/A	ISO 17025	Not-detected	Not-detected	Not-detected	Not-detected	Not-detected
Asbestos Analyst ID	N/A	N/A	N/A	JWU	JWU	JWU	JWU	JWU
Analysis completed	N/A	N/A	N/A	09/06/2025	09/06/2025	09/06/2025	09/06/2025	09/06/2025

#### General Inorganics

pH (L099)	pH Units	N/A	MCERTS	6.8	6.7	7.3	5.9	7.5
Water Soluble Sulphate as SO <sub>4</sub> 16hr extraction (2:1)	mg/kg	2.5	MCERTS	75	67	69	59	82
Water Soluble SO <sub>4</sub> 16hr extraction (2:1 Leachate Equivalent)	mg/l	1.25	MCERTS	37.4	33.6	34.4	29.6	40.8
Organic Matter (automated)	%	0.1	MCERTS	7.6	5.6	6.9	6.8	9.5

#### Speciated PAHs

Naphthalene	mg/kg	0.05	MCERTS	0.67	0.14	0.16	0.35	0.15
Acenaphthylene	mg/kg	0.05	MCERTS	< 0.05	< 0.05	< 0.05	< 0.05	0.07
Acenaphthene	mg/kg	0.05	MCERTS	0.88	0.46	0.36	0.8	0.51
Fluorene	mg/kg	0.05	MCERTS	0.6	0.32	0.21	0.58	0.37
Phenanthrene	mg/kg	0.05	MCERTS	5.6	3.1	2.5	5.2	3.9
Anthracene	mg/kg	0.05	MCERTS	1.2	0.62	0.55	1.1	0.93
Fluoranthene	mg/kg	0.05	MCERTS	7.5	4.6	4.2	6.7	6
Pyrene	mg/kg	0.05	MCERTS	6.7	4.1	3.9	5.9	5.4
Benzo(a)anthracene	mg/kg	0.05	MCERTS	3.3	1.9	1.8	3	2.7
Chrysene	mg/kg	0.05	MCERTS	3.1	2	1.9	2.9	2.6
Benzo(b)fluoranthene	mg/kg	0.05	ISO 17025	3.7	2.3	2	2.9	3.2
Benzo(k)fluoranthene	mg/kg	0.05	ISO 17025	1.4	0.99	1.2	1.7	1.1
Benzo(a)pyrene	mg/kg	0.05	MCERTS	3.4	2.1	2	2.9	2.9
Indeno(1,2,3-cd)pyrene	mg/kg	0.05	MCERTS	1.4	0.99	0.87	1.3	1.3
Dibenz(a,h)anthracene	mg/kg	0.05	MCERTS	0.37	0.25	0.24	0.36	0.38
Benzo(ghi)perylene	mg/kg	0.05	MCERTS	1.7	1.1	1	1.4	1.5

#### Total PAH

Speciated Total EPA-16 PAHs	mg/kg	0.8	ISO 17025	41.4	25	23	37.1	32.8
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Analytical Report Number: 25-028686  
 Project / Site name: Ashbroe Road, Fartown

Lab Sample Number	566634	566635	566636	566637	566638			
Sample Reference	HP101	HP102	HP103	HP104	HP105			
Sample Number	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied			
Water Matrix	N/A	N/A	N/A	N/A	N/A			
Depth (m)	0.05-0.15	0.05-0.15	0.05-0.15	0.05-0.15	0.05-0.15			
Date Sampled	22/05/2025	22/05/2025	22/05/2025	22/05/2025	22/05/2025			
Time Taken	None Supplied	None Supplied	None Supplied	None Supplied	None Supplied			
Analytical Parameter (Soil Analysis)	Units	Test Limit of detection	Test Accreditation Status					

**Heavy Metals / Metalloids**

Element	Unit	Test Limit	Accreditation	566634	566635	566636	566637	566638
Arsenic (aqua regia extractable)	mg/kg	1	MCERTS	27	24	9	30	26
Boron (water soluble)	mg/kg	0.2	MCERTS	1.6	1.1	1.1	0.6	2.3
Cadmium (aqua regia extractable)	mg/kg	0.2	MCERTS	0.8	0.8	0.3	0.8	0.9
Chromium (hexavalent) Low Level	mg/kg	1.2	NONE	< 1.2	< 1.2	< 1.2	< 1.2	< 1.2
Chromium (aqua regia extractable)	mg/kg	1	MCERTS	32	30	34	31	28
Copper (aqua regia extractable)	mg/kg	1	MCERTS	100	71	29	91	84
Lead (aqua regia extractable)	mg/kg	1	MCERTS	140	110	250	140	130
Mercury (aqua regia extractable)	mg/kg	0.3	MCERTS	< 0.3	< 0.3	< 0.3	< 0.3	< 0.3
Nickel (aqua regia extractable)	mg/kg	1	MCERTS	24	22	28	25	25
Selenium (aqua regia extractable)	mg/kg	1	MCERTS	1.9	1.1	1.4	1.6	1.5
Zinc (aqua regia extractable)	mg/kg	1	MCERTS	170	150	300	150	170

U/S = Unsuitable Sample I/S = Insufficient Sample ND = Not detected

**Analytical Report Number : 25-028686**

**Project / Site name: Ashbroe Road, Fartown**

\* These descriptions are only intended to act as a cross check if sample identities are questioned. The major constituent of the sample is intended to act with respect to MCERTS validation. The laboratory is accredited for sand, clay and loam (MCERTS) soil types. Data for unaccredited types of solid should be interpreted with care.

Stone content of a sample is calculated as the % weight of the stones not passing a 10 mm sieve. Results are not corrected for stone content.

Lab Sample Number	Sample Reference	Sample Number	Depth (m)	Sample Description *
566634	HP101	None Supplied	0.05-0.15	Brown loam and clay with gravel and vegetation
566635	HP102	None Supplied	0.05-0.15	Brown loam and clay with gravel and stones
566636	HP103	None Supplied	0.05-0.15	Brown loam and clay with gravel and vegetation
566637	HP104	None Supplied	0.05-0.15	Brown loam and clay with gravel and vegetation
566638	HP105	None Supplied	0.05-0.15	Brown loam and clay with gravel and vegetation

Analytical Report Number : 25-028686

Project / Site name: Ashbroe Road, Fartown

Water matrix abbreviations:

Surface Water (SW) Potable Water (PW) Ground Water (GW) Process Waters Heating/Cooling (PrW) DI Process Water (DI PrW)

Final Sewage Effluent (FSE) Landfill Leachate (LL)

Analytical Test Name	Analytical Method Description	Analytical Method Reference	Method number	Wet / Dry Analysis	Accreditation Status
Asbestos identification in Soil	Asbestos Identification with the use of polarised light microscopy in conjunction with dispersion staining techniques	In-house method based on HSG 248, 2021	A001B	D	ISO 17025
Organic matter (Automated) in soil	Determination of organic matter in soil by oxidising with potassium dichromate followed by titration with iron (II) sulphate (Walkley Black Method)	In-house method	L009B	D	MCERTS
Moisture Content	Moisture content, determined gravimetrically (up to 30°C)	In-house method	L019B	W	NONE
Stones content of soil	Standard preparation for all samples unless otherwise detailed. Gravimetric determination of stone > 10 mm as % dry weight	In-house method based on British Standard Methods and MCERTS requirements.	L019B	D	NONE
Metals in soil by ICP-OES	Determination of metals in soil by aqua-regia digestion followed by ICP-OES	In-house method based on MEWAM 2006 Methods for the Determination of Metals in Soil	L038B	D	MCERTS
Boron, water soluble, in soil	Determination of water soluble boron in soil by hot water extract followed by ICP-OES	In-house method based on Second Site Properties version 3	L038B	D	MCERTS
Sulphate, water soluble, in soil (16hr extraction)	Sulphate, water soluble, in soil (16hr extraction)	In-house method	L038B	D	MCERTS
Speciated PAHs and/or Semi-volatile organic compounds in soil	Determination of semi-volatile organic compounds (including PAH) in soil by extraction in dichloromethane and hexane followed by GC-MS	In-house method based on USEPA 8270	L064B	D	MCERTS
Hexavalent chromium in soil (low level)	Determination of hexavalent chromium in soil by extraction in water then by acidification, addition of 1,5 diphenylcarbazide followed by colorimetry	In-house method	L080-PL	W	NONE
pH in soil (automated)	Determination of pH in soil by addition of water followed by automated electrometric measurement	In-house method	L099-PL	D	MCERTS
Soil Descriptions	Textural classification	In-house method	L019B	W	NONE

For method numbers ending in 'UK' or 'A' analysis have been carried out in our laboratory in the United Kingdom (Watford).

For method numbers ending in 'F' analysis have been carried out in our laboratory in the United Kingdom (East Kilbride).

For method numbers ending in 'PL' or 'B' analysis have been carried out in our laboratory in Poland.

Soil analytical results are expressed on a dry weight basis. Where analysis is carried out on as-received the results obtained are multiplied by a moisture correction factor that is determined gravimetrically using the moisture content which is carried out at a maximum of 30°C.

Unless otherwise indicated, site information, order number, project number, sampling date, time, sample reference and depth are provided by the client. The instructed on date indicates the date on which this information was provided to the laboratory.

Quality control parameter failure associated with individual result applies to calculated sum of individuals.

The result for sum should be interpreted with caution



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## Sample Deviation Report

**Analytical Report Number : 25-028686****Project / Site name: Ashbroe Road, Fartown**

This deviation report indicates the sample and test deviations that apply to the samples submitted for analysis. Please note that the associated result(s) may be unreliable and should be interpreted with care.

Key: a - No sampling date b - Incorrect container/Insufficient material provided c - Holding time d - Headspace e - Temperature

Sample ID	Other ID	Sample Type	Lab Sample Number	Sample Deviation	Test Name	Test Ref	Test Deviation
HP101	N/A	S	566634	bc	Speciated PAHs and/or Semi-volatile organic compounds in soil	L064B	bc
HP102	N/A	S	566635	bc	Speciated PAHs and/or Semi-volatile organic compounds in soil	L064B	bc
HP103	N/A	S	566636	bc	Speciated PAHs and/or Semi-volatile organic compounds in soil	L064B	bc
HP104	N/A	S	566637	bc	Speciated PAHs and/or Semi-volatile organic compounds in soil	L064B	bc
HP105	N/A	S	566638	bc	Speciated PAHs and/or Semi-volatile organic compounds in soil	L064B	bc

