

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2025/92518 - Land Adjacent, 18B, Cowlersley Lane, Cowlersley, Huddersfield, HD4 5TY
Discharge of details reserved by conditions 3 (facing and roofing materials), 7 (floor and ground levels), 10 (Phase I Report), 11 (phase II Report) and 18 (renewable energy) on previous permission 2023/90582 for erection of 2 detached dwellings
Date Responded:
22/07/2026

Responding Officer:
KB

Responding Ref:
WK/202609590

Our response relates to Condition 10 and 11 only.

Condition 10 – Phase I Report

For the purpose of discharging condition 10 (Phase I Report), on previous permission 2023/90582, a Phase I Environmental Desk Study Report by Rogers Geotechnical Services Ltd (RGS) has been received for Land adjacent to 18B Cowersley Lane (Ref: C4351/24/E/6662 dated 20/06/2024).

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 reports.

We have read and reviewed the report and make the following observations.

The RGS desk study identified that the site had historically remained undeveloped, however a number of potentially contaminative land uses were present within the surrounding area. These included historic sandstone quarrying, chemical works, mills, fuel tanks, service stations, areas of made ground, infilled ground and a historic landfill located approximately 82m to the north-west of the site.

The site was also identified as being underlain by the Huddersfield White Rock sandstone.

The preliminary Conceptual Site Model (pCSM) concluded that there were potential pollutant linkages associated with contamination and ground gas migration due to the historical and surrounding land uses. In view of these potential risks, the report recommended that a Phase 2 intrusive investigation be undertaken to establish the nature of the ground conditions, assess the presence of contamination, undertake ground gas monitoring and determine the suitability of the site for residential development.

Comments

We have reviewed the document provided, and the pCSM provides a comprehensive review of the site and potential risks associated with historical and surrounding land uses.

Condition 11 – Phase II Report

For the purpose of discharging condition 11 (Phase II Report), on previous permission 2023/90582, a Phase II Environmental Desk Study Report by RGS has been received for Land adjacent to 18B Cowersley Lane (Ref: C4351/24/E/6664 dated August 2024).

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 reports. We have read and reviewed the report and make the following observations.

The intrusive investigation completed by RGS comprised three trial pits, three rotary boreholes, installation of three gas monitoring standpipes and a programme of laboratory testing on soil samples. The investigation confirmed that the site is underlain by shallow sandstone bedrock associated with the Huddersfield White Rock Formation. Topsoil was encountered to depths of approximately 0.2m to 0.3m with sandstone bedrock present at depths between 0.3m and 0.6m. No significant made ground deposits were identified, and no groundwater was encountered during the investigation.

Chemical testing was undertaken on three near-surface soil samples obtained from across the site. Laboratory analysis confirmed that asbestos was not detected in any sample. Total EPA-16 PAH concentrations ranged from 19.6 mg/kg to 29.8 mg/kg, and although several individual PAHs marginally exceeded generic screening criteria, the detailed risk assessment concluded that the concentrations do not represent an unacceptable risk for a residential end use with plant uptake.

Ground gas monitoring was undertaken on four occasions between July and August 2024. Monitoring recorded methane concentrations of up to 0.1% and carbon dioxide concentrations of up to 0.8%, with no measurable gas flow recorded. Based on the results obtained, the site was provisionally classified as Characteristic Situation 1 (CS1) in accordance with BS8485, representing a very low risk from ground gases. However, RGS noted that the monitoring programme did not fully satisfy the guidance contained within CIRIA C665 and recommended that two additional monitoring visits be undertaken over a further two-month period, preferably during falling barometric pressure conditions, before a final classification is confirmed. These additional monitoring visits have not been completed. As such, the conclusions regarding ground gas risk should be regarded as provisional and subject to confirmation following completion of the outstanding monitoring.

Overall, the Phase 2 investigation concluded that the site is suitable for the proposed residential development, no contamination remediation is required, and the only specific environmental protection measure necessary is the incorporation of basic radon protection.

There is a generic wording around the criteria for materials to be reused and imported to the site in Section 11.4 of the report however it is unclear as to how the materials will be determined to be suitable.

Comments

The RGS Phase 2 Geo-Environmental Investigation recommends two further rounds of ground gas monitoring. These works have not been undertaken and therefore the ground gas assessment cannot be considered fully complete. Further information regarding how site won materials will be determined to be suitable is also required.

Recommendations

Condition 10 - Phase I Desk Study Report

We have reviewed the document provided and we are happy to discharge Condition 10 (Phase I Report).

Condition 11 – Phase II Report

It is recommended that the additional monitoring and an updated assessment be submitted prior to the discharge of Condition 11 (Phase II Report).

Upon receipt of additional information, we recommend that further consultation with Environmental Health is undertaken.