

Consultation Response from: KC Environmental Health (Pollution & Noise Control)

2025/92646 - Greenside Mill, Savile Road, Skelmanthorpe, Huddersfield, HD8 9EE

Discharge of details reserved by conditions 6 (Phase II Intrusive Site Investigation Report), 7 (Remediation Strategy) and 9 (Remediation Validation Report) of previous outline permission 2018/91787 for demolition of existing buildings and structures and erection of residential development

Date Responded:
20th February 2026

Responding Officer:
NH

Responding Ref:
WK/202530914

Condition 6 – Phase II Site Investigation

To discharge Condition 6, the following document authored by Michael D Joyce Associates have been received:

1. Contaminated Land Review (August 2025, 4493)
2. Supplementary Phase 2 Ground Investigation (September 2025, 4496)

The report includes geotechnical information, which is outside the remit of Environmental Health. This consultation response relates only to the land contamination aspects of the submission.

We have read the reports provided and these represents a substantial improvement in understanding current site conditions.

The Contaminated Land Review consolidates previous site investigations and addresses the implications of poorly controlled demolition and earthworks undertaken in 2023. The report confirms that identified contamination hotspots have been remediated and validated. These include hydrocarbon-impacted soils in the vicinity of TP04/TP206 (former above-ground storage tank) and TP218/TP223 (mill pond area), and asbestos-impacted soils at TP06 (<0.001%) and within stockpiled materials (HDTP101 <0.001% and TP217 0.015%). The report also references elevated naphthalene within eastern pond sediments and its subsequent management. Mine workings were investigated by proof drilling and site strip, with no shallow workings identified.

The Supplementary Phase 2 Investigation provides additional intrusive verification following earthworks. Sixteen window samples were undertaken, with laboratory analysis identifying variable Made Ground thickness, marginal PAH exceedances (including benzo(b)fluoranthene and dibenzo(a,h)anthracene within WS102 and WS103 in public open space), and low-level chrysotile asbestos fibres recorded at <0.001%, 0.002% and 0.026%, with one insulation board fragment at 0.001% by mass.

The reports conclude the original remediation strategy is broadly applicable, however a revised remediation strategy has been provided. Overall, the two reports are accepted and are sufficient to inform the remediation strategy for investigated areas. We recommend that Condition 6 is discharged.

Condition 7 – Remediation Strategy

To discharge Condition 7, the following document authored by Michael D Joyce Associates have been received:

1. Remediation and Verification Strategy for Ground Gases (August 2025, 4494)
2. Remediation and Verification Strategy for Contaminated Soils (September 2025, 4499)

The report includes geotechnical information, which is outside the remit of Environmental Health. This consultation response relates only to the land contamination aspects of the submission.

The Remediation and Verification Strategy for Ground Gases (August 2025, 4494) concludes that Characteristic Situation 2 (CS2) ground gas conditions should be adopted for all proposed dwellings and associated garages across the site. In accordance with Table 4 of BS 8485, CS2 conditions for a low-rise residential end use require a minimum gas protection score of 3.5 points. The report proposes a 150 mm ventilated sub-floor void, providing at least good performance, in combination with a Juta GP1 gas protection membrane.

Section 4 of the report sets out proposals for verification of the gas protection measures, in line with CIRIA C735 and BS 8485. It is proposed that the verifier will undertake a thorough visual verification inspection of the first constructed plot. Subsequent verifier-led inspections will be undertaken at an approximate frequency of one in every ten plots, with a minimum of five plots inspected. For all remaining plots, MDJA suggest the principal contractor provide completed sign-off sheets as verification evidence, supported by appropriate photographic records demonstrating correct installation and integrity of all elements of the gas protection system.

The Remediation and Verification Strategy for Contaminated Soils (September 2025, 4499) proposes 600 mm of clean cover within private gardens and 450 mm within soft landscaped and public open space areas, incorporating either a granular 'hard-dig' layer or geotextile separator where required. Chemical acceptance criteria, sampling frequencies and compliance thresholds for imported and site-won materials are clearly defined and are consistent with the YALPAG Verification Requirements for Cover Systems (Version 4.1). The verification proposals include laboratory testing of clean cover materials, inspection and trial pits to confirm cover thickness, and detailed record keeping by a suitably qualified geoenvironmental engineer. MDJA add that a Validation Report will be required on completion.

Comments

We have read the reports provided. The proposed approach is acceptable in principle for plots yet to be developed, provided measures are installed strictly in accordance with the approved strategy and a satisfactory Verification Report is submitted prior to occupation. However, the documentation does not clearly identify which plots are occupied, completed or their current stage of construction. Verification evidence for installed gas protection measures on those plots has not been clearly presented and will need to be clarified, before the condition is considered for discharge.

Recommendations

Condition 6 – Phase II Site Investigation

We accept the Contaminated Land Review (August 2025, 4493) and Supplementary Phase 2 Ground Investigation (September 2025, 4496) by MDJA. We recommend that Condition 6 is discharged.

Condition 7 – Remediation Strategy

The proposed approach is acceptable in principle for plots yet to be developed, provided measures are installed strictly in accordance with the approved strategy and a satisfactory Verification Report is submitted prior to occupation.

However, the documentation does not clearly identify which plots are occupied, completed or their current stage of construction. Verification evidence for installed gas protection measures on those plots has not been clearly presented and will need to be clarified, before the condition is considered for discharge.