Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2026/90405 - Land south of railway line, Scar Lane, Milnsbridge, Huddersfield, HD3 4PN		
Discharge of conditions 3 (noise assessment), 5 (Phase I Desk Study Report), 6 (Site Investigation Report), 7 (Remediation Strategy), 15 (foul, surface, land drainage), 16 (seperate drainage systems) and 17 (surface water drainage) on previous permission 2024/91381 for variation of condition 2 (plans) on previous permission 2022/91789 for erection of four industrial units for E(g)(iii) (light industry) use with associated parking and turning facilities with 10 storage units		
Date Responded: **Wednesday, 15 April 2026**	**Responding Officer:** **HK**	**Responding Ref:** **WK/202607801**

Thank you for consulting Environmental Health on the above discharge of conditions application.

COMMENTS

Environmental Health has been consulted on the discharge of the Phase 1 and Phase 2 Contaminated Land conditions, and this response will therefore address Conditions 5 (Phase I Desk Study Report), and 6 (Site Investigation Report), on previous permission 2024/91381 for variation of condition 2 (plans) on previous permission 2022/91789.

The applicant has submitted the following documents pursuant to the above discharge of conditions:

- Phase 1: Desk Study, Ref S240420, dated May 2024, prepared by SOLMEK Ltd.
- Phase 2: Site Investigation, Ref: S240420, dated June 2024, prepared by SOLMEK Ltd.

During the Phase 1 desk study investigation, a site walkover was undertaken, and it was noted that the site consists of three levels sections of land with a gravel road connecting them. The site showed evidence of a variety of previous uses as noted:

"Site surface consists made ground. Brick walls present in the northwest, relating to the historic coal drops.

Other residential and commercial waste materials present south on the site.

A small wood structure is present with wood cutting machine. Wood waste is present in the northwest and south of the site.

Rocks, bricks, railway line, steel pipes, possible fuel leakages, residential and industrial waste noticed on the site".

The site history demonstrates a significant on and off-site industrial past, and concludes that:

"The site has been exposed to contamination, with construction/demolition waste, railway waste, timber waste and possibly oils or fuel from vehicle spills during construction and demolition work on or next to the site the most likely sources of contamination. Asbestos may be present on the site from previous construction and demolition next to the site.

..a ground gas assessment is considered necessary for the site to observe standing groundwater levels and to allow measurements to be made of hazardous gases and

contamination levels in groundwater. Monitoring should be undertaken following site works on a minimum of six occasions over three months.".

The Phase 2 intrusive site investigation was undertaken on the 9th May 2024 comprising:

- 5no small percussive boreholes (BH01 to BH05 inclusive) to a maximum depth of 2.00m below ground level (bgl).
- Gas monitoring wells were installed in BH's 02, 03 & 05.
- 7no machine excavated trial pits (TP01 to TP07) were dug to a maximum depth of 3.50mbgl.

Sampling for contaminants identified:

"The levels of contaminants across the site are generally low with exceedances limited to two of the six samples tested, as summarised below:

- *TP02 - 0.10-0.20m (Made Ground – granular) recorded elevated benzo(b)fluoranthene, benzo(a)pyrene, dibenz(a,h)anthracene and total PAH*
- *TP03 - 1.00-1.10m (Made Ground – granular) recorded elevated levels of nickel and asbestos (chrysotile)".*

The report suggested that:

"Based on the shallow soil contamination testing, it is considered that the levels of contamination are unlikely to pose a risk to future users of the site, as all contaminated areas will be covered either by buildings or hardstanding". However, during the construction phase, construction workers and users of nearby sites may be at risk, and therefore appropriate PPE should be worn by construction workers, and dust suppression used during dry weather to prevent dust. Additionally, the report advised that *"further asbestos may be present elsewhere on the site that has not been sampled or tested during this investigation. It is therefore advised that having a qualified asbestos surveyor present during the initial site strip and any excavation works is given careful consideration. All works should be undertaken in accordance with the Control of Asbestos Regulations (2012) and CIRIA C733 Asbestos in soil and made ground: a guide to understanding and managing risks".*

Additional advice is given in relation to construction materials such as concrete and water pipes, unexpected contamination and waste classification.

A ground gas assessment is presented in section 8. The report advised that:

""as monitoring is via measuring emissions from three standpipes (BH02, BH03 & BH05) that were installed during the sitework. The gas monitoring will consist of six visits over a period of three months. The gas monitoring results will be presented as an addendum to this report.

The rationale of the ground gas installations was to capture ground gas emissions from across the site, with BH03 in particular targeting deep made ground, and BH02 and BH05 providing additional spatial coverage".

No ground gas addendum has been submitted with this report. The addendum will require submission before Environmental Health can conclude their assessment and consider the discharge of condition 6.

RECOMMENDATION

The submitted Phase 1: Desk Study, Ref S240420, dated May 2024, prepared by SOLMEK Ltd satisfies the requirements of condition 5 which may be discharged.

Condition 6 requires the submission of the ground gas addendum in order for this to be considered by Environmental Health to conclude our assessment of the Phase 2 Intrusive Site Investigation. Condition 6 must remain until further notice.