

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2026/90818 adj, Ash House, 240, Dunford Road, Holmfirth, HD9 2SJ		
Erection of detached dwelling		
Date Responded: 12th June 2026	Responding Officer: KB	Responding Ref: WK/202616553
Foul Drainage It is unclear whether the development has access to a mains drainage system, and no detailed information has been provided regarding the proposed foul water drainage system although we understand from the application form that the proposals may include a package treatment plant (PTP). Before the application can be determined, the applicant must submit detailed information demonstrating how a satisfactory foul drainage system will be provided. This information should confirm the location and capacity of the PTP to ensure it is adequate for the proposed development. Contaminated Land As part of the application 2026/90818, a Phase 1 Environmental Desk Study Report by RGS (16/03/2026 - C5652/25/E/8788) has been received. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore relates only to land contamination. We have read and reviewed these reports and make the following observations. The Phase 1 Environmental Desk Study provides a comprehensive review of the site history, environmental setting and potential contamination risks associated with the proposed development. The site comprises an area of undeveloped land with proposals for a single residential dwelling with gardens. A site walkover was conducted on 4th March 2026 noted that the site had been scraped and levelled with a small gravel ramp allowing access. RGS reported that there were no obvious sources of contamination observed with the site scrape revealing clay soil. Historical mapping from 1893 to present identifies that the site has been undeveloped with several potentially contaminative land uses within the surrounding area, including a former woollen mill with associated mill pond being located directly south of the site. Most recently, this former mill has been developed for residential use. A summary of the geology suggests that the site is underlain by the Millstone Grit with no superficial deposits or made ground. There are records of unspecified quarrying 64m east and a water feature (mill pond) 45m southeast associated with the nearby mill.		

The site is located within an area which could be affected by former coal and other mining but there is no evidence of coal workings beneath the site.

Potentially contaminative sources identified within the report primarily relate to made/infilled ground across the site, although this is noted within the report as likely to be thin or absent. Ground gases have been identified as a potential hazard.

The preliminary conceptual site model (pCSM) identifies potential pollutant linkages including a Moderate risk associated with made ground on the site and migration of hazardous gases via permeable strata. The report concludes that further testing is required and recommends a Phase 2 Intrusive Investigation to assess ground conditions, contamination risks and potential ground gas

This investigation should include a minimum of three exploratory locations, soil and groundwater sampling for chemical analysis and installation of standpipes with a gas monitoring programme (minimum 6 visits over 3 months) in accordance with relevant guidance.

Comments

The submitted Phase 1 Desk Study provides an appropriate baseline for the site. However, the conceptual site model does not consider potential off site contaminative sources, in particular the adjacent the former woollen mill and associated mill pond. This should have been identified and carried through the conceptual site model as a potential source of contamination and ground gas.

The conceptual site model should not rely primarily on the potential presence of made ground on the site, particularly where this is acknowledged within the report to be likely thin or absent and is not supported by site observations.

The report does identify ground gas as a potential risk and appropriately recommends a Phase 2 Intrusive Investigation including gas monitoring, which is considered necessary and proportionate. The proposed investigation is sufficient to further characterise the risks identified.

It is therefore recommended that planning permission can be granted, subject to the imposition of the contaminated land conditions outlined below.

It is expected that any subsequent Phase 2 Intrusive Site Investigation, remediation strategy and verification works are undertaken in accordance with current good practice guidance and fully consider both on-site and off-site sources of potential contamination.

Electric Vehicle Charging Points (EVCPs)

In an application of this nature, it is expected that facilities for charging electric vehicles and other ultra-low emission vehicles are provided in accordance with the National Planning Policy Framework and *Air Quality & Emissions Technical Planning Guidance* from the West

Yorkshire Low Emissions Strategy Group. An advisory relating to charging points is therefore necessary.

Construction Times

Construction can give rise to loss of amenity to neighbouring sensitive receptors, for this reason a condition is necessary to limit the hours of operation for the site.

Recommendations

Adequate Provision for Foul Drainage – *Before determining the application.*

We require information in relation to foul drainage for this development. However, if the applicant can demonstrate that mains sewer connection is available, then the following conditions apply. If the applicant provides additional information in relation to a package treatment plant, we recommend that there is further discussion with Environmental Health before the following conditions are considered as part of the permission.

Before the application can be determined, the applicant must submit detailed information demonstrating how a satisfactory foul drainage system will be provided. This information should confirm the location and capacity of the tank to ensure it is adequate for the proposed development. We require this information to prevent potential pollution of the local environment, in accordance with the Kirklees Local Plan (LP34 and LP52) and Chapter 15 of the National Planning Policy Framework.

Adequate Provision for Foul Drainage - Footnote

Specialist advice should be sought for the design and installation of a small sewage treatment system which should meet the relevant standards. The conditions relate to Planning Control only. Approval under the Building Regulations may also be required, and the applicant should contact their Building Control Provider for further information. Any other necessary consent must be obtained from the appropriate authority. If the applicant commences work without discharging conditions, they will be at risk of enforcement action and invalidating the permission if the planning condition is a pre commencement condition.

Any discharge from a waste-water treatment system is likely to require a consent from the Environment Agency who may need to be consulted on the application.

CLC2 Submission of a Phase 2 Intrusive Site Investigation Report - Condition

Groundworks (other than those required for a site investigation report) shall not commence until a Phase II Intrusive Site Investigation Report by a suitably competent person has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 189 and 190 of the National Planning Policy Framework

CLC3 Submission of Remediation Strategy - Condition

Where site remediation is recommended in the Phase II Intrusive Site Investigation Report approved pursuant to condition (CLC2) further groundworks shall not commence until a

Remediation Strategy by a suitably competent person has been submitted to and approved in writing by the Local Planning Authority. The Remediation Strategy shall include a timetable for the implementation and completion of the approved remediation measures.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 189 and 190 of the National Planning Policy Framework

CLC4 Implementation of the Remediation Strategy - Condition

Remediation of the site shall be carried out and completed in accordance with the Remediation Strategy approved pursuant to condition (CLC3). In the event that remediation is unable to proceed in accordance with the approved Remediation Strategy or contamination not previously considered in either the Preliminary Risk Assessment or the Phase II Intrusive Site Investigation Report is identified or encountered on site, all groundworks in the affected area (except for site investigation works) shall cease immediately and the Local Planning Authority shall be notified in writing within 2 working days. Works shall not recommence until proposed revisions to the Remediation Strategy have been submitted to and approved in writing by the Local Planning Authority. Remediation of the site shall thereafter be carried out in accordance with the approved revised Remediation Strategy.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 189 and 190 of the National Planning Policy Framework.

CLC5 Submission of Verification Report - Condition

Following completion of any measures identified in the approved Remediation Strategy or any approved revised Remediation Strategy a Verification Report by a suitably competent person shall be submitted to the Local Planning Authority. No part of the site shall be brought into use until such time as the remediation measures have been completed for (that part of) the site in accordance with the approved Remediation Strategy or the approved revised Remediation Strategy and a Verification Report in respect of those remediation measures has been approved in writing by the Local Planning Authority. Where verification has been submitted and approved in stages for different areas of the whole site, a Final Verification Summary Report shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 189 and 190 of the National Planning Policy Framework

CLC7 Contaminated land - Footnote

All contamination reports shall be prepared by a suitably competent person, as defined in Annex 2 of the National Planning Policy Framework. Reports must be prepared in accordance with the following guidance:

- Land Contamination Risk Management (LCRM)
- BS 10175:2011+ A2:2017 Investigation of Potentially Contaminated Sites. Code of Practice
- Development on Land Affected by Contamination - Technical Guidance for Developers, Landowners & Consultants - (v11.2) June 2020 by the Yorkshire and Lincolnshire Pollution Advisory Group.

The conditions relate to Planning Control only. Approval under the Building Regulations may also be required, and the applicant should contact their Building Control Provider for further information. Any other necessary consent must be obtained from the appropriate authority. If the applicant commences work without discharging conditions, they will be at risk of enforcement action and invalidating the permission if the planning condition is a pre commencement condition.

EVF1 Electric Vehicle Charging Points – Advisory Footnote

- Approval under the Building Regulations may also be required, and the applicant should contact their Building Control Provider for further information in relation to Approved Document S.
- The electrical supply of the final installation should allow the charging equipment to operate at full rated capacity and the installation must comply with all applicable electrical requirements in force at the time of installation.
- To futureproof the development, we would encourage the applicant to provide these in accordance with the current *Air Quality & Emissions Technical Planning Guidance* from the West Yorkshire Low Emissions Strategy (WYLES) Group

CSC1 Construction Site Working Times - Condition

No construction related noise shall be audible beyond the site boundary outside the hours of:

- 07.30 to 18.30 hours Mondays to Fridays
- 08.00 to 13.00 hours Saturdays

With no construction related noise audible beyond the site boundary on Sundays or Bank/Public Holidays.

Reason: To safeguard the amenities of the occupiers of nearby properties in accordance with part 15 of the NPPF and LP52 of the Local Plan

CSF1 Construction Sites working times – Footnote

Kirklees Council has powers under Section 60 of the Control of Pollution Act 1974 to control noise from construction sites and may serve a notice imposing requirements on the way in which construction works are to be carried out. It has additional powers under Sections 80 of the Environmental Protection Act 1990 to prevent statutory nuisance including noise, dust, smoke and artificial light and must serve an abatement notice when it is satisfied that a statutory nuisance exists or is likely to occur or recur. Failure to comply with a notice served using the above-mentioned legislation would be an offence for which the maximum fine on summary conviction is unlimited.