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

2026/90952 Adjacent to 71 Woodhead Road, Honley, HD9 2RJ

Discharge of details reserved by conditions 5, (Phase I), 6 (Phase II), 7-9 (Remediation) on previous permission 2024/92297 for erection of two detached dwellings

Responding Date: 24 June 2026	**Responding Officer:** SR	**Responding Ref:** WK202615728

Comments

Condition 5, (Phase I)

In support of the application a Phase I: Desktop Study & Risk Assessment Report, Reference: GES 1623-21 PI, issued in September 2021 has been submitted.

A site walkover was carried out on the 16th of September 2021; the site is described as an irregular shaped piece of land with an approximate area of 0.1 Ha. An approximate distribution of the surface covering is summarised in Table 2.1. A selection of photographs from the site walkover are presented in Appendix 2.

The site is described, with local geology and nearby borehole data provided. The site history since 1854 is presented and on-site and nearby historical industrial land uses listed in table 4.1; with two recorded historical industrial land uses noted on site. We are informed there are no tanks on site. The report identifies historic nearby landfills.

A Preliminary Conceptual Site Model is presented in Section 8 demonstrating further intrusive investigation is necessary in relation to possible contamination/made ground and ground gas.

Condition 6 (Phase II Intrusive Site Investigation Report)

In support of the discharge of condition 6 a Phase II Updated Risk Assessment Report by GeoEnviro Solutions Ltd, ref: GES-PII 1623-21, dated November 2021, and an updated letter report with further sample information, by GeoEnviro Solutions Ltd, dated 23rd February 2026 have been submitted. The report contains geotechnical information which is beyond the remit of Environmental Health.

Fieldworks were undertaken from 13th October to 15th 2021 and included Four window sample boreholes to a nominal depth of up to 9.00 mbgl. Soil samples were removed from shallow sub surface locations, with further samples taken at observed changes in strata.
A summary of ground conditions is presented in Table 5.1 with strata comprising made ground, sandy/gravely made ground, clays with brick and concrete fragments.

Sampling was undertaken during the original fieldworks with subsequent fieldworks and sampling in 2026. Lead and asbestos were found at location WS02, during the initial sampling program. The report author goes on to explain that the site strip has already taken place with filled materials having been removed. We are informed the area where contamination has been found *"is located within the footprint of the proposed building location. As such the pathway will be broken as end users will not be able to come into direct contact with the contamination."* The report goes on to provide information on treatment of made ground and soft landscaped areas of the site explaining*; "a suitable thickness of material is removed from site and replaced with clean imported Topsoil. GES have been made aware of the removal of spoil and import of clean material in September 2022 in service of this following sampling of*

materials Typically, in situations such as this, adopting BRE: Cover Systems for Land Regeneration as the most appropriate protocol to follow would be considered acceptable. As such, a thickness of 600mm (from the final ground level) of clean imported material would be considered appropriate.

We are not provided of any evidence of this .

The report Author presents the results of gas monitoring at site; 4 wells were installed visited 6 times. No methane was recorded but carbon dioxide was found at a maximum of 4.1v/v. The report author uses the data to characterise the site as situation level 1.

The conceptual site model (CSM), is presented indicating low risk in relation to gas and some remediation necessary in relation to the contaminants encountered.

The supplementary letter confirms the report author has reviewed the earlier reports and undertaken further sampling in proximity to previously tested samples. They conclude that they agreed with the original report and confirm "*It is the opinion of GES that the findings of this investigation do not show a significant increase in the presence of contaminants and that the previous Conceptual Site Model and any related recommendations are unchanged from the previous investigation and the recommendations made therein should be followed."*

We are not presented with sufficient information to inform the suitability of imported materials that are required to provide 600mm of clean cover to all soft landscaped areas. The letter invoice from Abacus (Appendix 8), is insufficient to prove the site has been remediated.

We make the following recommendations.

Recommendations

Condition 5 (Phase I Desk Study Report)
On the basis of the professional judgement of the report author and the evidence and interpretations presented in the Phase I: Desktop Study & Risk Assessment Report by GeoEnviro Solutions Ltd., Reference: GES 1623-21 PI, issued in September 2021, Environmental Health have no objection to the discharge of condition 5.

Condition 6 (Phase II Intrusive Site Investigation Report)
On the basis of the professional judgement of the report author and the evidence and interpretations presented in the Phase II And Updated Risk Assessment Report by GeoEnviro Solutions Ltd, ref: GES-PII 1623-21, dated November 2021, and an updated letter report with further sample information, by GeoEnviro Solutions Ltd, dated 23rd February 2026, Environmental Health have no objection to the discharge of condition 6.

Condition 7-9 Remediation and Validation
No remediation Strategy has been submitted for review. Insufficient information has been provided to demonstrate remediation of the site; we therefore recommend conditions 7-9 remain.