Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2026/91775 – Land at Dowker Street, Milnsbridge, Huddersfield. HD3 4JU.		
Discharge of details reserved by conditions 4 (C(E)MP), 5 (CEMP: Biodiversity), 6 (road survey), 7 (retaining walls), 9 (surface water features in the Highway), 10 (culvert condition survey of Longwood Brook), 11 (Drainage Strategy), 12 (Flood routeing), 13 (temp drainage), 14 (Phase 1 Report), 15 (Phase 2 Report), 16 (Remediation), 18 (Estate road specification), 19 (access specification), 20 (footpath connection specification), 21 (Boundary Treatment), 23 (Acoustic report), 24 (facing materials), 25 (roofing materials), 29 (Landscape strategy)on previous permission 2025/92728 for erection of 33 dwellings with associated car parking and landscaping		
Date Responded: 23/07/2026	**Responding Officer: KB**	**Responding Ref: WK/202621382**

This response relates to conditions concerning environmental health only (Conditions 14, 15,16 and 23)

Contaminated Land

Condition 14 (Phase 1 Report) that was discharged on 18th February 2026 (Our Ref: WK202604260).

This response relates to Condition 15 (Phase 2 Report) and 16 (Remediation Strategy) only.

Condition 15 (Phase 2 Report) and 16 (Remediation Strategy)
The following documents have been submitted to support this consultation.

- Stage 2 Geo Environmental Report authored by ARP, dated 29th June 2023 (ref: WSD/01r1)
- Appendix G: - A Contamination Remediation Statement authored by ARP, dated 29th June 2023 (ref: WSD/01rem1)

These documents were reviewed as part of the original application 2025/92728 (Our Ref WK202538155 dated 19th December 2025). No new information has been received. Our comments are unchanged.

The Stage 2 report explains the site is the former site of Britannia Mills and residential buildings, with several mills, a dye works, and a gas works located within 200 metres of the site. A factory was present on site until it burned down in 2011. Two site investigations by ARP assessed several potential pollutant linkages: the initial investigation in 2015 involved 12 trial pits (TP1 TP12) excavated to depths between 1.6 metres and 3.8 metres below ground level, while a supplementary investigation in 2023 included four boreholes (WS2-WS5) and one hand pit (WS1), creating an approximate 25-metre grid pattern across the site. Overall, chemical analysis has been completed on 8 samples.

The ground conditions revealed varying depths of made ground over alluvium and sandstone bedrock. Chemical analysis, compared to human health screening criteria, identified organic and inorganic risks from made ground contamination. Chrysotile asbestos fibre was detected in several demolition rubble samples, and ash and clinker were identified in the made ground.

The report concludes that remediation is necessary, with a statement provided in Appendix 8 of the main document.

The proposed remediation strategy includes a minimum of 0.6 metre of uncontaminated topsoil and subsoil. Additionally, a 0.1-metre-thick hard break layer of coarse crushed stone or robust geotextile/geogrid is recommended beneath the clean cover soils. A protective barrier is proposed in the culvert area.

After placing the cover soils in residential garden areas and public open spaces, it will be necessary to confirm the required 0.6 metre of uncontaminated soil by excavating trial pits to this depth across these areas, at a rate of one pit per two plots and a maximum spacing of 25 meters in public open spaces. Laboratory testing of imported and site-won topsoil and subsoil will be required, with the testing schedule and necessary sample numbers specified in Section 5 of the report, in line with YALPAG guidance.

Comments
We have read the submitted reports and do not accept them based upon the following:

- At the time of the Phase 2 investigation in 2023, the northern end of the site was under dense vegetation cover (large bushes and small trees), with only a small clearing in the northeastern corner. Much of the northern end of the site was impenetrable due to the density of the vegetation. Given the site condition, the contamination encountered to date and the limited access in the north of the site, we request a post-clearance intrusive investigation to confirm the site condition and to inform a revised remediation strategy.
- Section 7.10 of the report states that further consideration of the presence of chrysotile is required.
- Whilst we acknowledge the statistical analysis undertaken, we require further examination and explanation of the organic and inorganic contaminants found in areas TP3, 4 and 12, we consider these to be potential hotspots.
- We require clarification regarding changes to site levels and require further commentary on asbestos risk and the depth of clean cover proposed.
- Until such time that Condition 15 (Phase 2 Report) has been discharged, we are unable to consider information to support Condition 16 (Remediation Strategy)

<u>Noise – Condition 23 Noise Assessment and Mitigation Measures</u>
A Noise Impact Assessment by Braiden Acoustics Ltd dated 28 July 2023 Ref 11140 was submitted as part of the initial application and was accepted as part of our consultation response dated 19th December 2025 (Our Ref: WK202538155) with the following mitigation *“The boundary treatment to the gardens should be close boarded timber fencing with a surface density of at least 10 kgm-2”.*

The evidence does not confirm that the mitigation has been carried out in full and such works shall be thereafter retained.

Recommendations

Until such a time that further information has been received by Environmental Health regarding a revised site investigation and remediation strategy, we are unable to discharge Conditions 15 (Phase 2 Investigation) and 16 (Remediation Strategy) and both conditions must remain.

Condition 23 requires evidence that the noise mitigation recommended in the Noise Impact Assessment by Braiden Acoustics Ltd has been implemented at the site. This condition must remain.