

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2026/91785 - adj, 161, Reinwood Road, Quarmby, Huddersfield, HD3 4DS
Outline application for erection of up to 5 dwellings with all matters reserved expect layout and access
Date Responded:
13th October 2026

Responding Officer:
NH

Responding Ref:
WK/202623389

Contaminated Land

The following documents have been received in support of the application:

1. Report on a Phase 1 Desk Study by RGS (September 2025, Ref. C5092/25/E/7764)
2. Report on a Phase 2 Geo-Environmental Investigation (November 2025, Ref. C5092/25/E/7765_Rev1)
3. Additional Ground Gas Monitoring Letter by RGS (9th January 2026, Ref. C5092/25/E/GM)

We have read the documents provided. The reports include geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspect of the reports.

The Phase 1 Desk Study (September 2025, Ref. C5092/25/E/7764) describes a 0.42 ha parcel of undeveloped land comprising rough vegetation. No visible signs of contamination were identified during the site walkover inspection. A review of the site history dating back to 1854 indicates that the site has historically been used for agricultural purposes and allotment gardens. Surrounding historical land uses include quarrying, mills, chemical works and residential development. The site is not located within a Development High Risk Area; however, potential coal mining risks were identified and highlighted within the RGS report. The nearest identified infilled land is located approximately 30 m north-east of the site. Several potentially contaminative features were identified on or adjacent to the site, including:

- Allotment gardens;
- Refuse tip;
- Pond; and
- Quarry workings.

A preliminary Conceptual Site Model was presented in Table 7 of the report, identifying potential on-site and off-site sources of contamination. Potential risks included contamination associated with made ground and the generation and migration of ground gases.

The report recommended an intrusive site investigation to assess potential contamination sources. The proposed works included soil sampling, chemical analysis and the installation of three gas monitoring standpipes to monitor ground gas conditions.

The Phase 2 report (November 2025, Ref. C5092/25/E/7765_Rev1) documents fieldwork undertaken on 15th October and 26th November 2025. The investigation included five window sample boreholes, three gas monitoring standpipes and seven trial trenches. Gas monitoring standpipes were installed within WS01, WS02 and WS04 at depths between 0.8 m and 4.0 m below ground level (bgl), with installation details provided on the borehole records.

Trial trenching was undertaken to determine whether the adjacent historic landfill encroached onto the north-eastern edge of the site.

A total of three gas monitoring visits were completed over a two-week period. Monitoring results recorded methane concentrations of 0.0%, carbon dioxide concentrations between 0.4% and 0.9%, oxygen concentrations between 19.6% and 20.2%, and no detectable flow rates. RGS provisionally classified the site as Characteristic Situation 1 (CS1).

The investigation confirmed the presence of contaminated landfill-derived deposits. Lead concentrations exceeded the relevant screening value by 110 mg/kg (approximately 55% above the applicable screening value) within WS01. In addition, loose asbestos fibres were identified within made ground encountered in WS01, quantified at 0.006% of the sample. The report identifies a high risk from contaminated made ground, particularly associated with asbestos and lead contamination. A revised Conceptual Site Model is presented in Table 11 of the report.

RSG concluded the report by recommending the completion of additional ground gas monitoring, further assessment of gas risks; and the implementation of remedial works where necessary.

Further gas monitoring visits were detailed in the Additional Ground Gas Monitoring Letter (9th January 2026, Ref. C5092/25/E/GM). These were undertaken between 30th October 2025 and 6th January 2026.

The additional monitoring comprised six visits and considered falling atmospheric pressure conditions. The maximum concentrations recorded were no methane, carbon dioxide 0.9% v/v with a maximum flow rate of 0.1 l/hr. Based on these results, RGS continued to classify the site as Characteristic Situation 1 (CS1).

Comments

The investigations have confirmed the presence of contamination within made ground associated with the adjacent historic landfill, including elevated lead concentrations and asbestos fibres. Whilst the reported gas monitoring results indicate a low ground gas risk classification (CS1), concerns remain regarding the adequacy of the monitoring programme. Given the site's proximity to a historic landfill and the proposed sensitive end use, the ground gas monitoring undertaken may be insufficient to fully characterise the potential risk. The monitoring does not appear to be in accordance with good practice guidance.

In addition, the extended response zone within monitoring standpipe WS01 (1.0 m to 4.45 m bgl) spans multiple geological strata, which may dilute gas concentrations and result in unrepresentative monitoring data. Further ground gas monitoring and a more detailed gas risk assessment are therefore recommended to adequately assess the potential risks associated with the adjacent landfill.

We also have concerns about the number of samples tested as this does not appear sufficient to characterise the amount of landfill material which may be encroaching on site. We'd also expect more detailed information about the landfill.

Overall, given the sensitive end use, and the former use of the site, we do not believe the ground investigation sufficiently characterises the site and confirms the site is safe for residential development. We request additional information to address these points before the application is determined. If sufficient information to address these points is not provided, then we recommend that the application is refused.

Recommendations

Other Environmental Health matters may be relevant to this application, including the requirement for a Construction Environmental Management Plan (CEMP), noise impact considerations, and advisory notes relating to electric vehicle charging infrastructure. However, given the former use of the site and the outstanding concerns regarding land contamination, it is unclear at this stage whether Environmental Health will be in a position to support the application. Consequently, we are withholding any detailed recommendations on other matters until the contamination issues have been satisfactorily addressed.