

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

2026/92158 adj, Marsh Conservative Club, Abb Street, Marsh, Huddersfield, HD1 4PB

Discharge of details reserved by conditions 6 (Remediation Strategy), 8 (Validation Report) on previous permission 2022/93245 for erection of two semi-detached dwellings

Responding Date:
27/08/2026

Responding Officer:
KB

Responding Ref:
WK202625682

Environmental Health have been consulted in relation to Condition 6 (Remediation Strategy) and 8 (Validation Report) on previous permission 2022/93245. We acknowledge receipt of a Remediation Strategy & Validation Proposal Sheet - Rev A, authored by Arc Environmental Limited (ARC) (10th February 2025, Ref: 24-596) and a Validation Report also authored by Arc (24th July 2026, Ref: 24-596). We have reviewed the submitted information and our comments are below.

Condition 6 – Remediation Strategy

In relation to Condition 6 (Remediation Strategy), Environmental Health was previously consulted on this condition as part of previous application 2024/93360. The Remediation Strategy & Validation Proposal Sheet - Rev A, authored by Arc Environmental Limited (ARC) (10th February 2025, 24-596) has been reviewed in support of this application.

The report includes geotechnical information beyond the scope of Environmental Health. This response addresses only the contaminated land aspects of the report.

The Remediation Strategy confirms that approximately 0.35m of made ground will be removed in areas associated with gardens and soft landscaping and that additional testing of the base of the excavation will be undertaken to confirm all impacted soils have been removed. Further details are outlined in Section D of the report. Following the removal of the material, approximately 0.35m of imported topsoil will be used to bring site levels back up, and the validation of imported materials is detailed in the report. The remediation measures implemented will be outlined in a validation report in accordance with current best practice.

Condition 8 – Validation Report

The submitted Validation Report (Ref. 24-596, dated July 2026) was prepared following completion of the remediation works at site. The report relates to the construction of two residential dwellings with associated gardens and parking areas and has been prepared to verify the remediation measures detailed within the approved Remediation Strategy (Ref. 24-596 Rev A, February 2025). The Validation Report also makes reference to the previous Phase 1 Desk Study and Phase 2 Ground Investigation prepared for the site.

Contamination risks identified during the site investigation works, namely elevated concentrations of lead and polycyclic aromatic hydrocarbons (PAHs) within the shallow made ground deposits were considered capable of posing a risk to future residential end users. In accordance with the approved remediation strategy, made ground to a depth of approximately 0.35m was excavated and removed from all proposed garden and soft landscaped areas exposing the underlying natural soils.

The Validation Report states that an Arc Environmental representative attended site on 7th

August 2025 to oversee and validate the excavation works. The made ground was removed from the proposed garden areas and disposed of off-site. Following excavation, a validation sample was obtained from each of the two garden areas and submitted for laboratory analysis for lead and speciated PAHs. The results were compared against the residential with home-grown produce assessment criteria adopted for the site. The report concludes that all analysed concentrations were below the relevant screening criteria, with no exceedances identified, and therefore confirms that the impacted made ground had been successfully removed from the proposed garden areas.

The report also presents validation information relating to imported topsoil used within the soft landscaped areas. The imported topsoil is reported to have originated from a brownfield source at Hammerton Street, Bradford, and pre-importation testing results are included within the appendices of the report. On site validation testing was completed on the 7th August 2025 with samples being tested for a suite of contaminants in line with the approved Remediation Strategy and current best practice. The laboratory results indicate that all recorded concentrations were below the adopted residential assessment criteria and no asbestos fibres were detected. The report concludes that the imported topsoil is suitable for use within the residential garden areas.

The report ultimately concludes that the remediation and validation works have been completed in accordance with the approved Remediation Strategy and that no further remedial measures are considered necessary. Supporting appendices include a validation sampling location plan, photographic records of the excavation works, validation laboratory results from the excavation base samples, pre-importation soil testing data and validation testing results for the imported topsoil.

Comments

The submitted Validation Report demonstrates that the main remediation works have been completed in accordance with the approved Remediation Strategy. The Validation Report confirms that the made ground was removed from the proposed garden areas and that validation samples were collected from the exposed natural soils following excavation. Laboratory testing was undertaken for the contaminants of concern identified during the site investigation and the results indicate that the remaining soils are suitable for the proposed residential use. The report also includes validation testing of the imported topsoil and concludes that the material is suitable for use within the garden areas.

However, the report does not fully address all the validation requirements set out within the Remediation Strategy. Whilst it states that the excavated made ground was removed from site for disposal, no waste transfer notes, landfill receipts or details of the disposal facility have been provided. This information was identified within the Remediation Strategy as part of the validation process and is required to provide a complete record of the remediation works undertaken.

The report also confirms that imported topsoil was tested and found to be suitable for residential use. It does not provide details of the quantity of soil imported to site or the thickness of topsoil placed within the garden areas. Whilst the quality of the imported material has been demonstrated, there is insufficient information to confirm that the replacement soil cover has been installed in accordance with the approved remediation scheme.

Additional information is required regarding the disposal of excavated material and the quantity and depth of imported soils before it can be confirmed that all aspects of the approved Remediation Strategy have been fully implemented.

Recommendations

Condition 6 – Remediation Strategy

We accept the Remediation Strategy & Validation Proposal Sheet - Rev A, authored by Arc Environmental Limited (ARC) (10th February 2025, 24-596) and we recommend that Condition 6 is discharged.

Condition 8 – Validation Report

Whilst the submitted report satisfactorily demonstrates that the contaminated made ground has been removed and that the validation testing is acceptable, additional information is required regarding the disposal of excavated material and the quantity and depth of imported soils before it can be confirmed that all aspects of the approved Remediation Strategy have been fully implemented.

We would recommend that Condition 8 remains in place at this time.