[redacted]

**From:** Hannah Varley
**Sent:** 15 September 2026 15:00
**To:** Planning Comments (SMDC)
**Subject:** FW: DOC/2026/0031 in relation to SMD/2025/0346 - Lilac Grove Farm, 83 Folly Lane, Cheddleton

[redacted]

---

**From:** EHealth Consultation < [redacted] >
**Sent:** 20 May 2026 11:25
**To:** Hannah Varley [redacted]
**Subject:** RE: DOC/2026/0031 in relation to SMD/2025/0346 - Lilac Grove Farm, 83 Folly Lane, Cheddleton

Hi Hannah,

**RE: Condition 20**

The applicant has submitted a phase 2 intrusive investigation by GRM to discharge the condition.

**Brief Comments**
The investigation targeted areas of potential concern around the former farm but limited the sampling to the made ground / topsoil(?*). *Though the description of topsoil is used for soil beneath made ground, which little confusing. The reality appears to be that all the actual p topsoil was scrapped and stockpiled before the consultants were present on site.

The assumption that the Morridge formation soils are not contaminated is not unreasonable, but it should have been supported with at least some sampling / data. Particularly around H01 that appeared to show some deviation from the rest of the samples.

The report notes that although they considered enough samples had been taken (not *technically* supported by the British Standard, they did not undertake any statistical analysis. There are though sound reasons for not doing the statistical analysis (though not really explored here ) notably around the appropriate population grouping of an inherently variable population. However, this argument does not follow for the presumed stockpiled topsoil, which had been scrapped and stored, presumably unsupervised by the consultants. It is not clear if this is intended for reuse as topsoil for the development (typically 300mm is needed for Building Control / NHBC) or will be disposed of offsite (as much of the report relates to WAC testing etc. It is described as both "offsite topsoil stockpile and made ground.

The intention / source of topsoil for the development should be clarified

If it is to be reused, then 2 samples are insufficient for its classification. Indeed, when quoting the requirements for any imported soil the consultants notes (correctly) "*Typically an analysis rate of one sample per 250m3 and one sample per 50m3 (minimum of three samples per source and material type) applies for generated and virgin soils respectively*."

This really should have has a minimum of at least 3 samples per stockpile and/or related to the amount of material will be reused?

**Conclusions**

The report is considered generally OK and supports a general assumption that the likely risks from the site are low. However, the unsupervised scraping of the topsoil off the made ground has complicated the issue and further information is required to assess the robustness of that side of the assessment.

- We could do with clarification on – how much topsoil was scrapped off (depth) prior and from where e.g. was topsoil in the vicinity of HP01 unlikely included the stockpile.
- Do they consider this to be "off-site stockpile" and thus subject to condition 21
- What is the intended use of this stockpile - top soil / fill or offsite disposal.
- Is it intended that further topsoil be imported onto the site.

**Recommendation**

Further soil information testing will be required for the soils intended for the garden areas. Depending on the responses above, this can be achieved via this condition (20) or if the stockpile is considered "offsite" as described in this report this could be dealt with via condition 21.

*e.g. no topsoil is to be imported to the site until it has been tested for contamination and assessed for its suitability for the proposed development; a suitable methodology for testing this material shall be submitted to and agreed in writing by the Local Planning Authority prior to the soils being imported onto site. The methodology shall include the sampling frequency, testing schedules, criteria against which the analytical results will be assessed (as determined by the risk assessment) and source material information. The analysis shall then be carried out and validatory evidence submitted to and approved in writing to by the Local*

Thanks

Dan

**Dr. Daniel McCrory** Principal Pollution Officer
Environmental Health
High Peak Borough Council and Staffordshire Moorlands District Council
[redacted]
www.highpeak.gov.uk | Follow HPBC on X (Formerly Twitter) | Facebook
www.staffsmoorlands.gov.uk | Follow SMDC on X (Formerly Twitter) | Facebook

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at https://www.highpeak.gov.uk/YourData

---