

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2022/91184 - 120, Laund Road, Salendine Nook, Huddersfield, HD3 3TY		
Discharge conditions 8 (remediation strategy) and 9 (validation report) on previous permission 2019/90486 for demolition of existing dwelling and erection of 7 dwellings		
Date Responded: 21st June 2022	Responding Officer: Natalie Heaney	Responding Ref: WK/202212074
Conditions 8 and 9 – Remediation of the Site and Validation Report In our previous response, dated 21st April 2022, we reviewed the following documents: • A document titled '<i>Discharge of Condition Information</i>' (no author, no date, no reference) • Verification Report for Plot 7 Laund Road by Sub Surface North East Limited, dated March 22 (ref: NE3941F/7) • Gas Membrane Installation Validation Report by MEC Environmental Ltd, dated 10th March 22 (no reference) We accepted the Gas Membrane Installation Validation Report by MEC Environmental Ltd, dated 10th March 22 (no reference) however, we recommended that Condition 8 and 9 for Plot 7 remain until further notice. This was because we did not agree with the comparison of the soil results against the adopted screening criteria. Therefore, we could not accept the Verification Report for Plot 7 Laund Road by Sub Surface North East Limited, dated March 22 (ref: NE3941F/7). A letter from Sub Surface Consultants, dated 18th May 2022 (ref: DJ/NE3941F/S) has been submitted. However, Environmental Health understand this report has been superseded by a Verification Report for Plot 7 Laund Road by Sub Surface North East Limited, dated June 22 (ref: NE3941F/7 Rev 2) which has been submitted to discharge Conditions 8 and 9. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the reports. A site visit was also made by Natalie Heaney from Environmental Health on Tuesday 8th June 2022. The revised validation report (ref: NE3941F/7 Rev 2) has revisited the contamination assessment of the ecologically protected area of scrub to the rear of Plots 7 and 8 and the previous described soil samples have now been compared with the generic assessment criteria (GACs) for a residential with plant uptake setting. The GACs used have been provided in the appendix. Lead in Sample HD32 (260 mg/kg) was found to exceed the adopted assessment criteria (200 mg/kg), however the report has justified that no remediation is necessary in this area. We agree with the justification provided. We note that the validation report (ref: NE3941F/7 Rev 2) has not provided a summary table alongside the laboratory data in the report appendix. Alongside the submission of the full analytical results, for any future submission, we would expect a detailed comparison of any soil sampling results against the adopted screening criteria and a discussion in the main text. Nevertheless, the report provides sufficient information to satisfy the conditions. That is, the Verification Report for Plot 7 Laund Road by Sub Surface North East Limited, dated June 22		

(ref: NE3941F/7 Rev 2) and the Gas Membrane Installation Validation Report by MEC Environmental Ltd, dated 10th March 22 (no reference) satisfy the condition requirements, therefore we recommend that Conditions 8 and 9 are discharged for Plot 7 only.

A phased validation approach for different areas of the whole site has been agreed, we also expect a Final Validation Summary Report to be submitted to and approved before the site is brought into use.

Recommendations

Condition 8 and 9 – Remediation of the Site and Validation Report

The Verification Report for Plot 7 Laund Road by Sub Surface North East Limited, dated June 22 (ref: NE3941F/7 Rev 2) and Gas Membrane Installation Validation Report by MEC Environmental Ltd, dated 10th March 22 (no reference) satisfy the condition requirements, therefore we recommend that Conditions 8 and 9 are discharged for Plot 7 only.

We still require further validation reports for the remaining plots. Furthermore, as a phased validation approach for different areas of the whole site has been agreed, we expect a Final Validation Summary Report to be submitted to and approved before the site is brought into use.