

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2023/91736 - adj, 178, Deighton Road, Deighton, Huddersfield, HD2 1JJ
Discharge conditions 7 (Phase II Intrusive Site Investigation Report), 8 (Remediation Statement) on previous permission 2022/93345 for erection of one dwelling with detached workshop
Date Responded:
25th July 2023

Responding Officer:
NH

Responding Ref:
WK/202318868

Condition 7 – Phase II Intrusive Site Investigation Report

A Ground Investigation Report by Subsurface dated October 2022 (ref: NE4118A) has been received in support of the application. The document includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the documents.

The investigation included six mini boreholes, three rotary boreholes and four hand-dug trial pits. Samples were retrieved for analysis and compared against generic assessment criteria. Ground gas and groundwater monitoring was also undertaken in M1, M3A and M4 over six occasions when atmospheric pressures ranged from 993 to 1010 mB. Made Ground to depths of between >0.10 and 3.50 metres was encountered and no groundwater was encountered during the investigation. The soil analysis confirmed elevated levels of arsenic (M1, H1, HD4), lead (M1, M4, HD1 and HD4), benzo(b)fluoranthene (HD4), benzo(a)pyrene (HD4) and dibenz(ah)anthracene (M1, HD1, HD4). The analysis also determined that white (chrysotile) asbestos was present.

Concerning the levels of PAHs, the profile of the PAHs was found to match the ratio profile of the coal tar test material. The report then continues that the maximum determined benzo(a)pyrene level of 3.3 mg/kg is lower than the published C4SL for residential with plant uptake of 5.0 mg/kg. Then the report considers the level of PAHs, including benzo(b)fluoranthene and dibenzo(ah)anthracene are within acceptable limits.

Ground gas monitoring has been undertaken on six occasions. No methane was detected. The peak carbon dioxide concentration reported was 5.5% v/v and the minimum oxygen concentration encountered was 15.8% v/v with flow rates of <0.1 l/h. The report concludes that the site falls into Characteristic Situation 1 (CS1).

We have read the report and we do not accept it as we require additional information. Firstly, no atmospheric pressure trends have been reported in the ground gas information and data sheets. Secondly, the laboratory results presented do not appear to include the asbestos results that confirmed the presence of asbestos. Lastly, the surrogate marker approach used in the report to screen out the risks from PAHs assumes that benzo(a)pyrene is present in all the soil samples. However, the laboratory results presented indicate that benzo(a)pyrene was below the limit of detection in some of the samples. Therefore, it is unclear how this approach can be used when the presence of benzo(a)pyrene cannot be confirmed in these samples.

Overall, we do not accept the report and further information is necessary. For these reasons, Condition 7 must remain until further notice.

Condition 8 – Remediation Statement

A Remediation Statement by Subsurface, dated May 2023 (ref: NE4118C) has been received in support of the application. The document includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the documents.

The remediation strategy proposes a 450mm blanket of clean topsoil or topsoil and subsoil will be placed in all soft landscaping and a 600mm blanket of clean topsoil or topsoil and subsoil will be placed in gardens/ areas where there is a potential for fruit and/or vegetables to be grown. The cement-bound asbestos is to be removed and imported material will be brought onto the site for the clean cover system. Verification proposals have also been provided in Section 8 of the report.

We have read the remediation strategy however we cannot comment further until the applicant has responded to the points raised for Condition 7. Therefore Condition 8 must remain until further notice.

Recommendations**Condition 7 – Phase II Intrusive Site Investigation Report**

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We have read the remediation strategy however we cannot comment further until the applicant has responded to the points raised for Condition 7. Therefore Condition 8 must remain until further notice.