

Consultation Response from: KC Environmental Health (Pollution & Noise Control)**2024/90548 - Former Riverside Works, Honley, Holmfirth, HD9 6PW****Erection of veterinary surgery (Use Class E) and associated works including the formation of car parking and landscaping****Date Responded:**
7th January 2025**Responding Officer:**
NH**Responding Ref:**
WK/202440398**Contaminated Land**

In our previous comments dated 26th November 2024, we commented on a Phase 1 Desk Study (April 2024, ref: C4179/24/E/6409) and a Phase 2 Geo-environmental Investigation Report (May 2024, ref: C4179/24/E/6409), both authored by RGS. In relation to the Phase 2 document, we requested clarification and action on several points.

We have since received a letter response (December 2024, ref: C4179/24/E/6410) and a revised Phase 2 report. The letter clarifies that additional samples have not been taken, but potential gross contamination was identified in April 2024. RGS recommends drilling more boreholes, collecting at least three additional samples for Metals, PAHs, TPHs, (S)VOCs, and BTEX, and further testing for gross contamination risks.

In addition, RGS suggests installing three more ground gas/groundwater monitoring points to assess gross Light or Dense Non-Aqueous Phase Liquid contamination (L/DNAPL) contamination, and collecting three groundwater samples over 9 weeks to evaluate risks to controlled waters. They also recommend six additional ground gas monitoring visits over 2 months in line with BS8485.

Regarding underground storage tanks (USTs), RGS states they have not identified any, nor did the site walkover or Groundsure report indicate their presence. However, given the site's history as a garage, we expect further investigation for potential USTs and appropriate contingency measures to be provided in the contaminated land reports.

The borehole location plan has been revised and included in the updated Phase 2 report.

As the risk assessment is still incomplete, we expect further investigation as described in the received reports and good practice guidance. Should the gas monitoring data suggest further monitoring is necessary, then this should be undertaken before a report is issued. Following the investigation, a comprehensive revised Phase 2 report should be submitted, fully characterising the site, updating the conceptual site model, and addressing all potential contaminant linkages. A remediation strategy should then be prepared to address any unacceptable risks identified.

Recommendations

Overall, we accept the letter and acknowledge the report provided. However, our previous recommendations, as outlined in our response dated 26th November 2024, stand, as we believe a more comprehensive investigation is necessary. Please note that for the contaminated land conditions, paragraphs 189 and 190 of the National Planning Policy Framework should now be referenced as paragraphs 196 and 197, following the revised framework issued in December 2024.