

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2024/92454 - Land to North and South of, Crossley Lane, Dalton, Huddersfield, HD5 0QP

Discharge of details reserved by conditions 5 (access highway works), 6 (traffic calming measures), 8 (construction traffic), 9 (Phase II Intrusive Site Investigation Report), 10 (Remediation Strategy) and 14 (landscape) of previous outline permission 2015/90430 for erection of residential development comprising (Use Class C3) and incorporating associated new access (to Crossley Lane and Cold Royd Lane) and associated works

Date Responded:
2nd December 2024
Responding Officer:
NH
Responding Ref:
WK/202436285
Conditions 9 and 10 – Phase 2 Investigation and Remediation Strategy

Further to our comments in September 2024 (WK/202428633), we have now reviewed three additional reports authored by Lithos that have been submitted in support of the application to discharge Conditions 9 and 10:

- A letter titled 'Review of Ground Issues' (dated 14th January 2019, ref: 3435)
- Supplementary Geoenvironmental Appraisal (dated March 2020, ref: 3435/1)
- Remediation Strategy (dated October 2024, ref: 3435/2)

These reports include geotechnical information beyond the scope of Environmental Health. This response addresses only the contaminated land aspects of the report. After reviewing the reports provided, we recommend the conditions remain until further notice. The reasons for this are summarised below:

- We consider the information received so far to be incomplete. The ground investigation reports and the recent remediation strategy reference outstanding groundwater and surface water sampling, detailed risk assessments for contaminants, and acknowledge that further consideration is needed in these areas. This additional information has not been provided in the supporting documentation. Furthermore, no additional ground gas monitoring, groundwater monitoring, or PID monitoring data has been provided in support of the application.
- We also note that the reports reference areas outside the red line boundary, which makes the findings difficult to interpret. It is essential that all reports submitted in support of applications are site-specific.
- In addition, Lithos recommended 30 additional gas monitoring locations, following ARP's investigation, but the documents suggest that fewer locations were actually monitored in Lithos's investigation. Given the incomplete information received and to aid our understanding of the site, we request a full explanation of the chosen sampling methodology, including details on the selection of sampling locations, monitoring locations, and the testing suites used.

Finally, although we have not been able to fully review the remediation strategy due to the missing information, we do not believe there is sufficient justification to proceed with the turnover aspect of the remediation strategy at this stage.

Overall, due to the lack of sufficient information, we are unable to fully consider the discharge of these conditions. We recommend that the applicant address all the points raised herein. For any future submission, we request an updated, comprehensive, site-specific Phase 2 report, including all relevant site investigation details, alongside a revised Remediation Strategy. For these reasons, we recommend that Conditions 9 and 10 remain in place until further notice

Conditions 9 and 10 – Phase 2 Investigation and Remediation Strategy

Due to missing information and incomplete site characterisation, we are unable to fully consider the discharge of Conditions 9 and 10 at this time. Therefore, we recommend that Conditions 9 and 10 remain in place until further notice