

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2024/92617 - Longley Park Motors Ltd, The Triangle, Paddock, Huddersfield, HD1 4RU

Discharge of details reserved by condition 4 (CCTV Survey), 8 (Noise Management Plan), 9 (Phase II Intrusive Site Investigation Report), 10 (Remediation Strategy) on previous permission 2024/93100 for partial demolition and rebuild on the same footprint as the original structure; works to include removal of first floor offices and canopy over former petrol station pumps; new materials used in construction are to match existing; change of use to include vehicle car rentals and sales

Date Responded:
28th April 2025

Responding Officer:
NH

Responding Ref:
WK/202508583

Condition 9 – Phase II Investigation Report

In our response dated 17th March 2025, we requested clarification on the number of vapour monitoring visits and the absence of monitoring sheets. Since then, we have received the additional monitoring sheets, which are deemed acceptable.

We have also received an email dated 18th March 2025, reading:

‘As indicated within our supporting cover letter (ref. EN22119 CL 008, Page 3). We have now carried out six rounds of ground gas monitoring, in accordance with applicable guidance and the CLO's request. The Vapor Pin monitoring was intended to support the results of our more conventional ground gas monitoring. The results of the the Vapor Pin monitoring are consistent with expectations (i.e. there is no significant gas risk to the building); the data does not indicate the need for further monitoring.’

We have considered the above and maintain that the conventional gas monitoring has not targeted possible vapour intrusion in the existing structure. That said, given that additional monitoring and works have been proposed as part of the remediation strategy, we are satisfied that sufficient information is available to recommend the discharge of Condition 9.

Condition 10 – Remediation Strategy

A Remediation Strategy by Subadra (December 2024, EN21072 CL007) has been received in support of the application to discharge Condition 10. The report includes geo-technical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the report

Subadra considers there to be a risk to controlled waters at this site due to the hydrocarbon product and concentrations encountered, believed to be associated with the former petroleum infrastructure. The remediation proposals include removing the forecourt canopy, inspecting the former diesel tanks, and installing three treatment wells near BH001. Hydrocarbons will be removed manually over four visits. If the product is eradicated or reduced, this process will continue. Alternatively, if there is continued thickness in BH001 or the newly installed wells, in-situ treatment using reagents is proposed.

Following chemical injection, post-treatment groundwater monitoring is proposed over four months. If hydrocarbon product is recorded, contingency remediation proposals include groundwater uplift, repeat chemical treatment, or manual removal. Subadra then suggest that after removing the hydrocarbon product from all wells, verification monitoring will take place,

initially with two validation monitoring visits over six months. The information will then be collated and presented in a Validation Report.

We acknowledge the report provided, and are generally accepting of the proposals. However, Subadra states that the sub-floor void of the sales building is not impacted by hydrocarbon vapour. Given the limited vapour monitoring, we consider it prudent to provide additional information on possible vapour intrusion post-remediation to confirm vapour migration from BH001. Alternatively, further vapour monitoring within the existing structure would enhance confidence in the dataset, better support the report's conclusions. As issues remain outstanding for this application, we recommend that Condition 10 remain until further notice.

Recommendations

Condition 9 – Phase II Investigation Report

We are satisfied that sufficient information is available to recommend the discharge of Condition 9.

Condition 10 – Remediation Strategy

As issues remain outstanding for this application, we recommend that Condition 10 remain until further notice.