

**Consultation Response from: KC Environmental Health (Pollution & Noise Control)**
**2024/93026 - land at, Manor Street, Newsome, Huddersfield, HD4 6NW**
**Discharge of details reserved by conditions 3 (materials), 5-9 (site contamination), 11 (external lighting), 12 (cycle parking), 13 (bin store), 14 (ecological design strategy), 15 (landscaping) and 16 (drainage) of previous permission 2022/90655 for erection of 10 student residential units with associated landscaping**
**Date Responded:**  
**25<sup>th</sup> November 2024**
**Responding Officer:**  
**NH**
**Responding Ref:**  
**WK/202436944**
**Condition 5 – Preliminary Risk Assessment**

Condition 5 should not be discharged as the required Preliminary Risk Assessment (Phase 1 report) has not been submitted for review. While the Phase 2 report refers to a Phase 1 report, this document has not been provided for consideration. In the first instance, we expect a current, site-specific Phase 1 to be provided to satisfy this condition. As a result, we recommend that Condition 5 remain in place until the Preliminary Risk Assessment is submitted. We will then be able to review the report and reconsider our objection to the discharge of the condition.

**Condition 6 – Phase 2 Intrusive Investigation**

A Phase 2 Site Investigation authored by Chevin Geoenviron Associates Ltd (May 2023, C0564) has been submitted to support the application to discharge Condition 6. 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 report.

We are unable to fully review the report as the required Phase 1 report (Preliminary Risk Assessment) has not been submitted or approved. Therefore, we cannot confirm the suitability of the investigation undertaken. Nonetheless, at this stage, we note the following:

- The gas monitoring data does not appear to include pressure trends for all visits, which does not seem to align with good practice guidance.
- The report is missing confirmation of the sampling methodology used during the investigation.

Given these points, we recommend that Condition 6 remain in place until the necessary Phase 1 report is submitted. At that time, a full review of the Phase 2 report can be carried out and we will be able to reconsider our objection to the discharge of the condition.

**Condition 7 – Remediation Strategy**

Although our review of the Phase 2 report is still ongoing, it recommends the preparation of a Remediation Strategy for the site. The submitted verification report references a Remediation Strategy, but this has not been provided as part of the supporting documents. As no Remediation Strategy has been submitted with this application and insufficient evidence has been provided to confirm that remediation is unnecessary, we recommend that Condition 7 remain in place.

**Condition 8 – Verification Report**

A Verification of Remediation Works Report, authored by Chevin Geoenviron Associates Ltd (May 2024, ref: C0564), has been submitted in support of the application to discharge Condition 8. However, as a remediation strategy for the site has not yet been received,

reviewed or approved, we are unable to assess the verification report at this stage. Once the strategy is confirmed, we will be able to review the verification report accordingly. For these reasons, Condition 8 must remain in place until further notice.

### **Recommendations**

#### **Condition 5 – Preliminary Risk Assessment**

Condition 5 should not be discharged as the required Preliminary Risk Assessment (Phase 1 report) has not been submitted for review. While the Phase 2 report refers to a Phase 1 report, this document has not been provided for consideration. In the first instance, we expect a current, site-specific Phase 1 to be provided to satisfy this condition. As a result, we recommend that Condition 5 remain in place until the Preliminary Risk Assessment is submitted. We will then be able to review the report and reconsider our objection to the discharge of the condition.

#### **Condition 6 – Phase 2 Intrusive Investigation**

We recommend that Condition 6 remain in place until the necessary Phase 1 report is submitted. At that time, a full review of the Phase 2 report can be carried out and we will be able to reconsider our objection to the discharge of the condition.

#### **Condition 7 – Remediation Strategy**

As no Remediation Strategy has been submitted with this application and insufficient evidence has been provided to confirm that remediation is unnecessary, we recommend that Condition 7 remain in place.

#### **Condition 8 – Verification Report**

We are unable to assess the verification report at this stage. Once the strategy is confirmed, we will be able to review the verification report accordingly. For these reasons, Condition 8 must remain in place until further notice.