

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2025/92674 - Land North of, Denby Lane, Grange Moor, Huddersfield, WF4 4BH

Discharge of details reserved by conditions 3 (finished floor levels), 4 (garage details) 7 (remediation strategy), 10 (CEMP), 11 (CEMP: Biodiversity), 12 (drainage), 13 (storm events), 14 (temporary surface water drainage), 15 (surface water attenuation), 16 (road condition survey), 17 (carbon emissions), 19 (materials), 24 (estate street phasing), 26 (waste plan), 29 (cycle parking), 31 (bin storage), 32 (electric car charging point), 33 (boundary treatments) and 34 (crime protection measures) of previous permission 2024/92444 for erection of 21 dwellings and associated works with means of access from Denby Lane

Date Responded:
23/06/2026

Responding Officer:
KB

Responding Ref:
WK/202619155

Our response relates to Condition 7 only.

Condition 7 – Remediation Strategy

Further to our previous comments dated 11 May 2026 (Ref: WK/202530395), a revised Remedial Specification prepared by Groundtech Consulting (dated 16 June 2026, Ref: GRO-24078-5847) has been submitted in support of the discharge of Condition 7 (Remediation Strategy) attached to planning permission 2024/92444.

The revised report includes discussion of additional arsenic bio-accessibility testing undertaken using the BARGE method. The results indicate a bio-accessible fraction of between 32% and 36%, which has been applied within a revised CLEA assessment to derive an adjusted arsenic screening value of 67 mg/kg for a residential end use with plant uptake. The reported maximum arsenic concentration within site-won topsoil (58 mg/kg) falls below this revised screening value.

However, the bio-accessibility assessment is supported by summary information within the Remedial Specification only. The underlying laboratory results, including sample locations, depths, soil types and analytical certificates, have not been provided. In addition, reference is made to a document entitled *"Bio-Accessibility testing email correspondence produced by Groundtech Consulting dated 24 June 2025"*, which has not been submitted for review.

As such, the evidence base underpinning the revised arsenic screening value cannot presently be fully verified, and the representativeness of the bio-accessibility dataset across the site cannot be confirmed. This is particularly relevant given the known variability of arsenic concentrations within the Made Ground and topsoil across the site, including localised elevated values identified during the site investigations.

Recommendation

In the absence of the full supporting bio-accessibility data and referenced correspondence, we are unable to fully assess the robustness of the revised Remedial Specification.

Until this information is provided, we recommend that Condition 7 (Remediation Strategy) is not discharged.

Moving forward, we would expect any information provided by the contaminated land consultant to explain the rationale for the chosen samples sent for bioaccessibility testing, and consideration for the elevated arsenic levels encountered on site.