

Consultation Response from: KC Environmental Health (Pollution & Noise Control)

2026/91711 - Longley Park Motors Ltd, The Triangle, Paddock, Huddersfield, HD1 4RU

Discharge of details reserved by conditions 11 (Remediation Strategy) and 12 (Verification Report) on previous permission 2023/92347 for partial demolition and rebuild on the same footprint as the original structure

Date Responded:
Monday, 29 June 2026

Responding Officer:
HK

Responding Ref:
WK/202620712

Thank you for consulting Environmental Health on the above discharge of condition conditions 11 (Remediation Strategy) and 12 (Verification Report) on previous permission 2023/92347 for partial demolition and rebuild on the same footprint as the original structure.

COMMENTS

Environmental Health have responded to previous contaminated land consultations on the 1st November 2024, 18th February 2025, 17th March 2025 and most recently on the 28th April 2025.

Environmental Health concluded that we maintain that the conventional gas monitoring has not targeted possible vapour intrusion in the existing structure. However, given the additional monitoring and that 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.

Our response dated 28th April 2025 acknowledged the Remediation Strategy report, Ref: EN21072 CL007, dated December 2024, prepared by Subadra and were generally accepting of the proposals. However, we stated that *“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”* and on this basis did not recommend discharge of condition 10 for remediation.

The applicant has now submitted a Remediation Completion Report, Ref: EN21072CL011, dated June 2026, prepared by Subadra. The introduction of the report states:

“We developed a remedial strategy which was designed to remove any residual hydrocarbon product and reduce dissolved hydrocarbons to acceptable levels. This was submitted to, and approved by, the planning authority. All remedial activities and associated validation monitoring have now been completed, and this report contains a summary of the works undertaken, as well as the results of our post-remediation validation monitoring”.

Environmental Health are not aware of any further applications for the discharge of conditions relating to contaminated land between our last response dated 28th April 2025 and the present.

The planning officers Decision Notice, dated 20th May 2025 confirms that:

A document was submitted 13th May 2025 which sets out the approach for further vapour monitoring:

‘will be undertaken on three further occasions during the course of the remedial works. The purpose of this monitoring will be to increase confidence in our conclusions that no hydrocarbon vapours are migrating from the known area of impact and subsequently accumulating beneath the building. The monitoring will be carried out in accordance with our previous methods (for details see Subadra letter

ref. EN22119 CL 008), comprising semi-quantitative screening for hydrocarbon vapour concentrations using a photo-ionisation detector (PID), via the Vapour Pin monitoring points previously installed within the concrete floor of the building (penetrating into the underlying sub-floor void). If significant concentrations of hydrocarbon vapours (>100ppm) are identified in either of the monitoring points, during any of our additional monitoring events, we will carry out (additional measures).

The additional measures are considered to satisfy the outstanding issue which was raised as an area of concern by the Council's land quality team and therefore, in this case, it is considered there is sufficient information submitted and an acceptable approach to remediation of the site proposed, which now allows for the discharge of this condition".

The submitted Remediation Completion Report, Ref: EN21072CL011, dated June 2026, prepared by Subadra introduces the site and the need for the remediation of the site. Section 2 reiterates the remedial objectives and strategy, detailing the initial mechanical removal using bailers and absorbent booms, however, the report noted that:

"Manual removal was initially successful, fuel re-accumulated over time, potentially as a result of rising groundwater levels 'flushing' product out of fissures within the sandstone"

Section 2.3.2 appraises the potential for natural attenuation, suggesting that:

"Anaerobic attenuation of dissolved hydrocarbons beneath and down-gradient of the former forecourt area is occurring".

Section 2.4 presents the remediation objectives as:

- *"Inspection of the abandoned below ground diesel tanks (to verify they were not acting as an on-going source of contamination);*
- *Install 3No. treatment wells, immediately surrounding the primary contaminant plume (BH001), followed by injection of remediation reagents into the aquifer;*
- *Post-treatment monitoring to verify the effectiveness of our treatment".*

Section 4 details the remediation of the site, removal of hydrocarbon product, inspection of the below ground tanks, chemical remediation *"the application of remediation reagents to the three new remediation wells"* and the removal of residual hydrocarbon product from the tanks.

Section 5 presents the validation monitoring. This included additional hydrocarbon vapour and ground gas monitoring (June/July 2025) and then attending site on four occasions to carry out validation monitoring, between January – June 2026. Table 9 presents the results of this monitoring, noting that:

- *"No hydrocarbon product was recorded in any of the monitoring wells during these visits*
- *No hydrocarbon sheen or odours were noted during our visits during February 2026 or April.*
- *A hydrocarbon sheen and odour was noted in BH102 during our monitoring visit in June 2026".*

The report concludes that:

"Based on our previous monitoring data, anaerobic attenuation of dissolved hydrocarbons beneath and down-gradient of the former forecourt area is occurring. Now hydrocarbon product has been eradicated, we would anticipate attenuation rates to increase leading to a more rapid long-term reduction in residual dissolved hydrocarbons in the groundwater. Residual concentrations of hydrocarbons are therefore likely to continue to decrease, over time.

The additional ground gas / hydrocarbon vapour monitoring of the sales building, which was requested by the Council's Pollution Control Officer, was consistent with our previous monitoring, and confirms no significant concentrations of gas/vapours are present within the sales building sub-floor void. We therefore maintain that the installation / retrofitting of gas protection measures within the building is not necessary.

In conclusion, the results of our validation monitoring and subsequent assessment indicates that our primary remedial objective, which was the eradication of hydrocarbon product from BH001 and the associated reduction of dissolved hydrocarbons to the site-specific acceptance criteria (protective of controlled water receptors), have been achieved. On this basis, we do not consider further remedial works and/or validation monitoring is warranted".

The report I accepted in the basis of the conclusions presented, including the anticipated attenuation to continue the reduction in residual dissolved hydrocarbons in the groundwater.

RECOMMENDATION

The submitted Remediation Completion Report, Ref: EN21072CL011, dated June 2026, prepared by Subadra is accepted and satisfies the requirements of conditions 11 & 12, which may now be discharged.