

From: Marie Hughes-Jones <[REDACTED]>
Sent: 14 November 2025 11:06
To: Sylvia Whittingham <[REDACTED]>; Luke LLOYD <[REDACTED]>
Cc: Richard Purser <[REDACTED]>
Subject: HHC Planning Condition 3 Remediation

Syliva & Luke

Re: Hopwood Hall College – Remediation Strategy

You should have received a consultation on PC3 from the Council regarding the approval of the remediation strategy.

As a quick reminder the strategy has been approved by the Council under the enabling works permission 25/00519/FUL on 30th July 2025. However, the LPA then received a letter from yourselves on the 8th August 2025 which was received by ourselves on the 16th September 2025.

In the letter dated 8th of August, you did not object to the application (had it not already been approved) subject to a condition on contaminated land which included a requirement for a remediation strategy to be submitted and approved. You indicated in the letter that additional information was needed related to management of possible risks posed to controlled waters which you considered uncertain to the shallowness of solid soil samples. That same condition is now applied as PC3 to permission 25/00541/FUL.

We consider this has been addressed within our site investigation works and design as noted below, and it is this information which has been used by our remediation contractor to inform the Remediation Strategy for the works.

1. **TIER** the EA response references our previous Preliminary Risk Assessment and Ground Investigation Report and states “we note that the focus has been placed on the solid ground conditions without any consideration of groundwater or surface conditions.”. However, this is not the case – we have a dedicated section (Section 9) on controlled waters assessment (inclusive of groundwater and surface water sampling conducted):

I have extracted the table where we have conducted our assessment of groundwater and surface water data to evidence this fact:

Table 9.2 Summary of Measured Concentrations of Dissolved Phase Groundwater and Surface Water Potential Contaminants of Concern in Excess of WQS Values

Potential Contaminant of Concern	Units	LoD*	WQS	Maximum Concentration	No. samples >WQS	Monitoring Well Location	Surface Water Location
Copper	µg/l	1	1	3	6 of 9	CP01, CP02, CP03	Upstream (WS02UP), Midstream (WS03MID), Downstream (WS01DS)
Nickel	µg/l	0.2	4	17.7	1 of 9	CP01	-
Zinc	µg/l	1.5	10.9	12.9	3 of 9	CP103	Upstream (WS02UP), Midstream (WS03MID)
Fluoranthene	µg/l	0.005	0.12	0.007	2 of 9	CP4, WS112	-
Bis(2-ethylhexyl) phthalate	µg/l	5	1.3	12	1 of 9	CP4	-
Total Ammonia	mg/l	0.03	0.3	0.5	4 of 9	CP103, CP4, RH102, WS112	-

* LOD= Laboratory Method Limit of Detection

Our conclusions were also summarised in the Executive Summary of the report:

Contamination – controlled waters	Results from controlled waters risk assessment has demonstrated that measured groundwater concentrations of cadmium, copper, nickel, zinc, fluoranthene, and ammonia reported in excess of relevant Water Quality Standards and localised measured concentrations of glycols do not present a significant risk to the controlled waters environment when factors including the hydraulic upgradient and downgradient concentrations, aquifer sensitivity, wider commercial and industrial use of the surrounding land and surface water sample results are taken into account.
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2. Take additional solid soil samples from deeper as opposed to shallow depth – **TIER** Consistent with LC:RM (<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>), our compliance evaluation for controlled waters is based on receptor-relevant standards (DWS/EQS) applied at an agreed groundwater/surface-water compliance point, evidenced by monitoring data rather than soil concentrations alone (LCRM and EA's compliance-point guidance supports this approach). EA's Remedial Targets Methodology confirms that for groundwater, observed groundwater quality is compared directly to target concentrations, with monitoring boreholes used to set and verify compliance points. Risk to controlled waters is ultimately judged in the water body via DWS/EQS at compliance points.

In addition, once a soil unit is below the water table, it is part of the aquifer matrix and already in equilibrium with groundwater. As such, as is typically the case - soil leachate testing is designed to assess the potential for contaminants to migrate from soil into groundwater and depths would be selected with due consideration of groundwater levels at the site. Groundwater depths at the site have been recorded at an average depth of Circa 2.00m bgl. Soil leachate samples were taken from 0.30m to 1.90m bgl and general soils testing was conducted at depths between 0.10m and 3.40m bgl – therefore characteristic soils testing has been appropriate in the context of the conceptual site model, supported by groundwater and surface water testing in line with best practice.

It is a matter of fact that Willmott Dixon has lawfully commenced development on site under permission 25/00519/FUL which includes implementation of the approved remediation strategy. Regrettably as noted above your letter dated 8th August did not come to our attention until September after works began however, we have every intention of addressing the issues within the Planning Condition.

Though the Council, and directly to you here, we are asking for assistance and a considered approach. The site, in so far as the where the new building will be situated, is being prepared / remediated for development in accordance with the works proposed within the enabling works planning permission and piling is scheduled to start on 5th January 2026. However, the wider site where the existing building is located will need to be demolished with additional site investigations undertaken to include impact on human health and an updated remediation strategy for that area issued. That is planned for later 2028 / early 2029.

We would like to request that the approved remediation strategy is accepted now for the site of the new building under condition PC3 (Phase 1 works) and that we will provide further investigations and remediation strategy for the area of the existing building and landscaped area in a couple of years' time (Phase 2 works).

We trust this is acceptable, if you would like to review in further detail with your engineer and our consultant Tier, and the specialist contractor LK Remediation, we would be more than happy to schedule a meeting to ensure a prompt resolution and effective, efficient use of your time.

Kind regards

Marie

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