

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2019/90486 - 120, Laund Road, Salendine Nook, Huddersfield, HD3 3TY		
Demolition of existing dwelling and erection of 8no. dwellings		
Date Responded: 15 April 2020	Responding Officer: Richard Hume	Responding Ref: WK/201903882
Contaminated Land In our previous response dated 8 April 2020 we recommended that the additional Phase 2 Ground Gas Risk Assessment by Earth Environmental & Geotechnical, dated 25 Feb 2020 (ref: A0697/20) was accepted. It proposed provision of gas protection measures to CS2 to the proposed buildings. Previous reports had also recommended the provision of a capping layer to address the risks from contaminated soils which we had previously agreed to. We therefore accepted the proposals to address the contaminated land risks and advised that a remediation strategy was now required and recommended contaminated land conditions including the submission of a remediation strategy. A Report, Plot 2 to Plot 8 Remediation Strategy by Earth Environmental & Geotechnical dated 08 April 2020 (ref: A0697/19/RMS) has now been received. The report contains some geotechnical information which is outside the remit of Environmental Health. This response relates to just the contaminated land aspects of the report. The report provides the proposals for the clean cover capping layer for soft landscaped areas and gas protection measures for the buildings For the capping layer for soft landscaped areas which are located over retained made ground it proposed clean cover of a minimum 600mm for rear gardens and a minimum of 450mm for front gardens, each to include a minimum of 150mm topsoil and each to be underlain by a geotex marker layer as a barrier against potential wide spread asbestos in the made ground. It advises that the soils for the capping layer will be sampled and analysed at the rate of 1 per 100 m³ to confirm the suitability for use on site. The sampling will be a combination of both before and after importation onto the site. The depth of the capping layer will then be subsequently validated in each garden with a trial hole with photographic evidence to support this. The report also proposes gas protection measures that will be suitable for Characteristic Gas Situation 2 (CS2) and achieve a gas protection score of 3.5. It suggests a number of alternative options for sub floor ventilation and a generic specification for the gas protection membrane. It proposes that the validation and verification of the Gas Protection Measures will be in accordance with CIRIA C735. Comments and recommendations Part 5 of the report makes several references to the use of site won soils for the capping despite the existing soils being found to be unsuitable for reuse on the site. This could potentially lead to unacceptable site won materials being used as part of the capping layer. Appendix 3 provides the assessment criteria for the clean cover material, but this is not		

referred to in the main report at part 5.0 where it says chemical analysis of soils will be carried out and could potentially lead to unsuitable assessment criteria being used.

Depending on the total quantity of clean cover material required and the origin of this material, the proposed sampling frequency of 1 sample per 100 m³ may not meet the minimum number of samples recommended in the current version of *“Verification Requirements for Cover Systems - Technical Guidance for Developers, Landowners and Consultants”* by Yorkshire and Lincolnshire Pollution Advisory Group.

The report does not refer to the latest (Feb 2020) additional information which forms part of the and Approved Phase 2 report. Also, the report maintains that there is no viable ground gas source and that gas protection measures are being installed as a precautionary measure rather than the measured levels of carbon dioxide regularly exceeding 5% for which recognised guidance recommends gas protection measures.

Whilst the remediation strategy proposed validation and verification of the GPM is to be to CIRIA C735 this is not specified in any detail. In particular it is not made clear that the verification of the gas resistant membrane installation needs to be carried out where appropriate by an independent third party at a time after it has been laid and just before it is covered and the importance of photographic evidence to support the validation information

The actions required in case of unexpected contamination detailed in the report do not fully meet the requirement of the conditions that we have previously recommended.

Taking into consideration the previous and ongoing contaminated land issues on this site, I consider that the remediation proposals need to be precise and unambiguous which the report fails to achieve. Therefore, for the reasons detailed above I consider that the above-mentioned remediation strategy report is insufficient and recommend that it is not accepted. The conditions that we recommended in our response dated 8 April 2020 therefore continue to remain valid.