

Consultation Response from KC Environmental Health – Pollution & Noise Control		
2019/91327		
Thongsbridge Mills, Miry Lane, Thongsbridge, Holmfirth, HD9 7RW		
Reserved matters application pursuant to outline permission no. 2017/90207 for erection of B1 light industry		
Date Responded: 28rd May 2019	Responding Officer: Joanne Cooper	Responding Ref: WK/201909192
I have reviewed the documents supplied on behalf of the applicant and determined that further information would be required prior to the approval of the contaminated land remediation strategy proposed by ARP Geotechnical Ltd. The following reports have been supplied by the applicant and have been reviewed in full in order to determine the recommendations in this consultation response: • Combined Stage1/Stage2 Geo-Environmental Report (and associated appendices) at Thongsbridge Mills, Thongsbridge, on behalf of Mr S Marsden, reference MSD/01r2, by ARP Geotechnical Ltd and dated 23rd November 2018. • Contamination Remediation Statement (and associated appendices) for Thongsbridge Mills, Thongsbridge, on behalf of Mr S Marsden, reference MSD/01r2, by ARP Geotechnical Ltd and dated 23rd November 2018. I am satisfied with the determination of risk from low level contaminants found in the soil samples, along with the remediation strategy for these soil contaminants as described in the Contamination Remediation Statement sections 3.3 and 3.4, and the validation methods of the soil remediation detailed in section 4.0. Further to this I am satisfied that the imported topsoil and subsoil used for the 0.45m cover detailed in the remediation strategy should be sufficient if the sampling in section 5.0 is carried out in accordance with the aforementioned document. The concerns I have are in relation to the sampling strategy, discussion and mitigation of ground gas present on site .Before approving the strategy to mitigate the risks associated with the contamination sources (ground gas) identified in these reports I would require the following information. Gas Generation Potential and Sampling Strategy While the location and number of boreholes that have been used to undertake ground gas sampling are appropriate for a development of this nature and size, I would like the following information to be supplied prior to determining whether the remediation strategy is sufficient for the proposed development. 1. Details on how the gas generation potential of the contamination source has been determined. (this should be based on Tables 5.5a and 5.5b in Ciria C665 – Assessing risks posed by hazardous ground gases to buildings, page 60). 2. Details on how the sampling strategy based on that determination has resulted in four measurements taken over a nine week period. The Ciria C665 Table 5.5b		

would recommend a minimum of six measurements to be taken over a two month period if the generation potential of the contamination source is determined as "Low".

3. The percentage of carbon dioxide (CO₂) and methane (CH₄) present in borehole location WS4 has remained consistently high over the nine week monitoring period, despite the flow rate being negligible. Further investigation/risk assessment into the source of the ground gas in this location needs to be undertaken in order to establish which method of mitigation would be most suitable.

Remediation Strategy

As mentioned above, I am satisfied with the remediation strategy to be implemented for the soft landscaping areas of the site as it is described in the aforementioned report. Neither the Stage 1/Stage 2 Geo-Environmental Report or the Contamination Remediation Statement have addressed the specific remediation measures which will be installed to mitigate the potential hazards associated with CO₂ and CH₄ as measured in borehole WS4. To this regard I have recommended the following conditions as they apply to the presence of ground gas on the site.

CL23 Submission of Remediation Strategy

Where site remediation is recommended in the Phase II Intrusive Site Investigation Report approved pursuant to condition (CL22), development shall not commence until a Remediation Strategy has been submitted to and approved in writing by the Local Planning Authority. The Remediation Strategy shall include a timetable for the implementation and completion of the approved remediation measures.

Following this, the following conditions would be applied for potential hazards associated with the contaminants identified in the soil sampling and the ground gas sampling.

CL24 Implementation of the Remediation Strategy

Remediation of the site shall be carried out and completed in accordance with the Remediation Strategy approved pursuant to condition (CL23). In the event that remediation is unable to proceed in accordance with the approved Remediation Strategy or contamination not previously considered [in either the Preliminary Risk Assessment or the Phase II Intrusive Site Investigation Report] is identified or encountered on site, all works on site (save for site investigation works) shall cease immediately and the Local Planning Authority shall be notified in writing within 2 working days. Works shall not recommence until proposed revisions to the Remediation Strategy have been submitted to and approved in writing by the Local Planning Authority. Remediation of the site shall thereafter be carried out in accordance with the approved revised Remediation Strategy.

CL25 Submission of Validation Report

Following completion of any measures identified in the approved Remediation Strategy or any approved revised Remediation Strategy, a Validation Report shall be submitted to the Local Planning Authority. No part of the site shall be brought into use until such time as the remediation measures for the whole site have been completed in accordance with the approved Remediation Strategy or the approved revised Remediation Strategy and a Validation Report in respect of those remediation measures has been approved in writing by the Local Planning Authority.