

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2020/92657 - King James School, St Helen's Gate, Almondbury, Huddersfield HD4 6SG		
Erection of 10 classroom teaching block and formation of car parking area with associated engineering and landscape works (within a Conservation Area)		
Date Responded: 15 October 2020	Responding Officer: Natalie Heaney (Contaminated Land) Richard Hume	Responding Ref: WK/202025671
Electric Vehicle Charging Points It is understood that new parking spaces will be included in the development. In an application of this nature it is expected that facilities for charging electric vehicles and other ultra-low emission vehicles are provided in accordance with the National Planning Policy Framework and <i>Air Quality & Emissions Technical Planning Guidance</i> from the West Yorkshire Low Emissions Strategy Group. A condition requiring charging points is therefore necessary. Contaminated Land Two reports prepared by Abbeydale have been submitted by the applicant. These are a Phase 1 Desk Study Report, dated December 2019 (ref: 574010-DS) and a Ground Investigation Report, dated December 2019 (ref: 574010-GI). Firstly, the Phase I report provides an in-depth appraisal of the sites historical land uses. The site has been a school since c.1854. However, the surrounding land use has changed with industrialisation and mills and dye works were known to be situated within a 150m radius which are believed to present a source of potential contamination. A preliminary conceptual model (PCM) identified a low risk of potential contamination from on-site sources, a low to moderate risk from off-site sources and ground gases. It was concluded that fieldwork should include window sampling and trial pitting. Samples should be taken for chemical and geotechnical testing. I agree with the findings and recommendations of the Phase I report. The ground investigation found that no soils analysed were above the soil guideline values for public open spaces and confirmed the low risk rating from the PCM. I am happy with these findings from the Phase II report. However, I am unable to accept your proposals for fitting gas protection elements in line with Characteristic Situation 2 (CS2). The report identifies made ground as a potential ground gas source and this was assigned a low to moderate risk in the PCM. It was reported that the made ground was used to level the sports pitch between 1977 and 1988. As such, the made ground has been in place for a minimum of 32 years. The submitted Phase II has opted for an empirical approach to characterise the ground gas risk using the total organic carbon content (TOC, %) analysis results. The CL:AIRE RB17 guidance referred to for this approach, suggests that the maximum TOC content where the made ground has been present greater than 20 years, should be less than or equal to 3 %. The report suggests the low carbon content of 1.1% indicates the site would require gas protection elements in line with CS2. However, from the five samples analysed for TOC that were identified as made ground in the		

borehole logs at the corresponding sample depth (Appendix E), 6.8% TOC was the highest result for surface samples (WS1, < 30 cm) whereas, 1.6% TOC was the highest result for deeper samples (WS3, > 30 cm). Both values for TOC from made ground samples are over the stipulated guidance figure. It is unclear why 1.1% was identified as the maximum TOC value and from this, how the site fits into CS2. As such, CS2 measures may not provide adequate protection. Further information should be provided to demonstrate there is no risk from ground gas to receptors.

Justification as to how the site is CS2 is necessary. If no sufficient justification is provided then, the CL:AIRE guidance suggests gas monitoring is required where TOC is greater than 4% (or 6% in old Made Ground). Any quantitative assessment of the ground gas must follow CIRIA 665 – *Assessing risks posed by hazardous ground gases to buildings* guidance.

Until this information is received, contaminated land conditions relating to Phase II and the latter stages of development are still necessary.

Recommended Conditions

EVC1 Electric Vehicle Charging Points - Condition

Before the electrical system is installed a scheme detailing the dedicated facilities that will be provided for charging electric vehicles and other ultra-low emission vehicles shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall meet at least the following minimum standard for numbers and power output:

- One Standard Electric Vehicle Charging Point providing a continuous supply of at least 16A (3.5kW) for at least 10% of non-residential parking spaces

Buildings and parking spaces that are to be provided with charging points shall not be brought into use until the charging points are installed and operational. Charging points installed shall be retained thereafter.

Reason: In the interest of supporting and encouraging low emission vehicles, in the interest of air quality enhancement, to comply with the aims and objectives of Policies LP24 and LP51 of the Kirklees Local Plan and Chapters 2, 9 and 15 of the National Planning Policy Framework.

EVF1 Electric Vehicle Charging Points – Footnote

- A Standard Electric Vehicle Charging Point is one which is capable of providing a continuous supply of at least 16A (3.5kW) and up to 32A (7kW). The higher output is more likely to be futureproof
- Standard charging points that meet the requirements specified in the latest version of “*Minimum technical specification - Electric Vehicle Homecharge Scheme (EVHS)*” by the Office for Low Emission Vehicles will be acceptable. Basically, charging points that provide Mode 3 charging with a continuous output of least 16A (3.5kW) and have Type 2 socket outlet would be acceptable.
- At non-residential developments, the requirement for one standard electric vehicle charging point for at least 10% of parking spaces may initially be reduced to one charging point for at least 5% of parking spaces with the remainder provided at an agreed trigger point.
- For developments where some or all of the parking is likely to be used for shorter stay parking (30mins to 4 hours) then Fast (7-23kW) or Rapid (43kW+) charging points may

be more appropriate. If Fast or Rapid charging points are proposed together with restrictions on the times that vehicles are allowed to be parked at these points then a lower number of charging points may be acceptable.

- The electrical supply of the final installation should allow the charging equipment to operate at full rated capacity.
- The installation must comply with all applicable electrical requirements in force at the time of installation.

CLC2 Submission of a Phase 2 Intrusive Site Investigation Report - Condition

Groundworks (other than those required for a site investigation report) shall not commence until a Phase II Intrusive Site Investigation Report has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 178 and 179 of the National Planning Policy Framework

CLC3 Submission of Remediation Strategy - Condition

Where site remediation is recommended in the Phase II Intrusive Site Investigation Report approved pursuant to condition (CLC2) further groundworks 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.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 178 and 179 of the National Planning Policy Framework

CLC4 Implementation of the Remediation Strategy - Condition

Remediation of the site shall be carried out and completed in accordance with the Remediation Strategy approved pursuant to condition (CLC3). 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 groundworks in the affected area (except 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.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 178 and 179 of the National Planning Policy Framework

CLC5 Submission of Validation Report - Condition

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 have been completed for the site 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.

Reason: To ensure the safe occupation of the site in accordance with Policy LP53 of the Kirklees Local Plan and paragraph nos. 178 and 179 of the National Planning Policy Framework

CLC 7 Contaminated land - Footnote

All contamination reports shall be prepared in accordance with *Model Procedures for the Management of Land Contamination – Contaminated Land report 11* (CLR11), National Planning Policy Framework (NPPF) and the Council's Advice for Development documents or any subsequent revisions of those documents.