

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/90517 - Former Calder Works, Thornhill Road, Dewsbury, WF12 9QQ		
Discharge of condition 8 (validation report) of previous permission 2015/92252 for erection of two storey offices, production facility and warehouse		
Date Responded: 21th April 2021	Responding Officer: Natalie Heaney	Responding Ref: WK/202104091
Condition 8 – Validation Report To discharge Condition 8, the following documents have been submitted: • An Interim Validation for Phase 1 Construction by Rogers Geotechnical dated 02 Dec 2020 (ref: J3112/15/E/V1) • A Geoshield Gas Barrier Verification Document dated 25th July 2017 (ref: GEO1006200/AC/D). Note that the Geoshield document is provided in the same pdf document as the Rogers report. I have read the reports provided. The Rogers report details the validation carried out as part of the first phase of development. The site plan shows the goods yard sited off Thornhill Road with the portal framed structure located towards the front part of the site. A portion of the site behind the structure is annotated as an ecology buffer zone and outdoor rest area. The report details that the goods yard has been concrete paved, and the authors consider that the significant pollutant pathway has therefore been removed. Concerning the portal framed structure, the report details that a non-suspended floor slab has been utilised with a reinforced concrete floor over a type 1 sub-base. The report states that the ecology buffer zone area will be separated from the Phase I area by Herras fencing. Details of the gas protection elements and validation are also provided by Geoshield. Geoshield detail that a Visqueen Gas barrier 400gsm has been fitted and validated visually and using an air lance and destructive joint testing. From this, Rogers conclude that the structure and goods yard have been capped with concrete and protected against ground gases where necessary (the structure) so are safe to end-users. Also, that the report clarifies that the ecology buffer zone area will be verified under a separate document. Having read the reports, we consider that there are several issues with the information provided that require clarification: (1) The Rogers report (ref: J3112/15/E/V1) describes that a Type 1 sub-base has been used to underlay large portions of the site, which has then been capped with concrete. The agreed remediation strategy stated that 1 sample per 1000m³ of any crushed hardcore, stone or brick used as fill would be screened. This included testing for standard metals/metalloids plus PAH (16 USEPA) and asbestos, following YALPAG guidance. No screening information has been provided in the report and the submitted information does		

not appear to be in line with YALPAG guidance. Further information is needed to clarify why this is missing from the report and confirm the suitability of the material employed.

(2) The Geoshield Gas Barrier Verification Document (ref: GEO1006200/AC/D) identifies several insufficiencies such as incorrect stanchion and pipe penetration detailing and insufficient sand blinding which may cause punctures to the gas membrane. These would render the gas protection inadequate. It is unclear in the report what Geoshields conclusions are. Subsequently, it is also unclear whether the gas protection elements meet the agreed criteria and how the Rogers report (ref: J3112/15/E/V1) concluded that the gas membrane has been installed correctly. Further information is needed to clarify the installed gas protection elements at the site.

(3) Several errors exist in the Geoshield Gas Barrier Verification Document (ref: GEO1006200/AC/D). For instance, some photographic evidence has been referred to but then the report states '*click to set image*' indicating these have been missed out from the report. As such, it is unclear what these refer to. Further clarification is required.

(4) The Geoshield Gas Barrier Verification Document (ref: GEO1006200/AC/D) refers to gas protection elements for a CS2 ground gas regime and an industrial property, specifying the requirement for 1.5 points under BS8485 guidance. Yet later in the document (no page numbers provided), there is a reference to CS1 and the membrane appears to be only fitted around the perimeter of part of the building. Further clarification is required as to the ground gas protection elements at the entire building, how this conforms to BS8485 guidance and the agreed remediation strategy.

Overall, the information provided details concerning the validation of Phase I of the development. However, this is unsatisfactory. Until this information is received, Condition 8 should not be discharged.

Recommendations

The information provided for the discharge of Condition 8 is unsatisfactory and I recommend that Condition 8 remains until further notice.