

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: 10 th June 2021	Responding Officer: Natalie Heaney	Responding Ref: WK/202104091
Condition 8 – Validation Report In our 21st April 2021 response, we reviewed the following documents: • 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. From this, we recommended that Condition 8 should remain as unsatisfactory information has been received. We identified several issues that needed further clarification. We have now received an email received from Brunswick Estates dated 10th May 2021 (herein referred to as 'the email'), further information was received. The email responds point-by-point to our previous comments. Our first point was in relation to the lack of screening of the Type 1 sub-grade material. It was considered in the email that as the site is surrounded with concrete, the pollutant linkage will be broken. It was also stated that...: <i>'...the contractor states that the site was excavated to a depth of 3.5m and spoil removed, replaced with clean material from Peakstone, compacted in 150mm layers as per the piling contractors requirements, who then compacted piles within this. The contractor states that this MUST at the very least comply with YALPAG guidance since the materials have been removed and new materials imported, there has been NO screening of the existing materials any all. The site is in a much better condition as a result of the works than YALPAG guidance would result.'</i> Our second and third point related to clarification concerning the gas protection elements at the site and we considered there to be several errors and missing pieces of information in the Geoshield Gas Barrier Verification Document (ref: GEO1006200/AC/D). The email draws our attention to a Verification Certificate from Geoshield and a checklist in the previously submitted Geoshield Document (ref: GEO1006200/AC/D). Our final point related to further inconsistencies in the Geoshield Gas Barrier Verification Document (ref: GEO1006200/AC/D). We indicated that in that document, reference was made 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 was a reference to CS1 and the membrane appears to be		

only fitted around the perimeter of part of the building. As such we required 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.

In the email provided it is stated that *'the whole building was gas membrane protected.'*

Comments

As indicated in our previous response 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. We acknowledge that material has been imported onto the site. However, it remains that compliance with YALPAG guidelines for imported fill material has not been demonstrated. We still require further information confirm the suitability of the material employed.

Whilst we acknowledge a certificate has been issued by Geoshield, it remains unclear from the provided A Geoshield Gas Barrier Verification Document dated 25th July 2017 (ref: GEO1006200/AC/D) and additional email whether the remediation was completed in accordance with the agreed remediation strategy. Ultimately any validation document provided must confirm, to a high degree of confidence, that the gas protection elements detailed in the agreed remediation strategy have been fitted. We consider there to be missing information, inconsistencies and points requiring further clarification. As no further clarification has been provided to this effect it remains uncertain whether the development is safe for the intended end-use.

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 we recommend that Condition 8 remains until further notice.

