

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/92402 - 1013, Manchester Road, Linthwaite, Huddersfield, HD7 5LS		
Discharge of conditions 3 (Materials), 7 (Phase 1 Desk Study) and 8 (Phase II Intrusive Site Investigation Report) on previous permission 2021/90085 for the erection of 2 semi-detached dwellings		
Date Responded: 31st August 2021	Responding Officer: Natalie Heaney	Responding Ref: WK/202119710
Condition 3 is outside the remit of Environmental Health. In our most recent response dated 22nd June 2021, we recommended that: - For Condition 7, the Phase I report provided was considered satisfactory and we recommended the discharge of Condition 7. - For Condition 8, the Phase II report provided was considered unsatisfactory and we recommended that Condition 8 remained until further notice. We have since received new information in support of Condition 8. Condition 8 - Phase II Intrusive Site Investigation Report In our previous response dated 22nd June 2021, we commented on a Report on a Ground Investigation by GeoEnviro Solutions Ltd dated 9th June 2021(ref: GES 1399-21). We identified several points requiring clarification. In response, to discharge Condition 8, a revised Report on a Ground Investigation by GeoEnviro Solutions Ltd dated 9th June 2021(ref: GES 1399-21) has been received. We note that the revised report submitted includes additional information but no changes to the report date have been made. The information received includes geo-technical information, which is outside the remit of Environmental Health, this response therefore only relates to the land contamination aspects of the report. Having read the new information, we make the following comments: - In our original response, we noted that in several places within the report, there were many missing letters, words and/or mistakes. As such we considered the report illegible in parts. The revised report has amended these formatting errors. - We also requested further clarification concerning the site walkover and the sampling strategy undertaken to ensure all potential sources of contamination have been tested during the intrusive investigation. Now, in the revised report, additional information has been added: <i>‘Borehole WS01 was undertaken at the site of a burnt area of land and garden buildings, identified from the Phase 1 Desk Study. However, some site clearance had been undertaken and no significant evidence of burning was noted to remain during the investigation’</i> We can confirm that the additional information now satisfies our concerns that the burnt area of land has been examined as part of the site investigation. 3. Many of the points that we identified as needing further information related to the ground		

gas monitoring. We raised points on:

- a) The inconsistent reporting of the minimum oxygen concentration,
- b) The lack of consideration for oxygen depletion in the report,
- c) The inconsistent reporting of the ground gas flow rates observed and,
- d) The period and frequency of gas monitoring.

Since our initial response, we are pleased to see that an additional two monitoring visits have been undertaken. Now the total number of gas monitoring visits is 6 visits (on the 13th May 2021, 19th May 2021, 28th May 2021, 3rd June 2021, 25th June 2021 and 13th July 2021). The revised report also clarifies that the minimum oxygen concentration reported was 14.5% v/v and the maximum carbon dioxide concentration reported was 2.6% v/v. The flow peaked at 0.3 l/h and no methane was detected. The additional monitoring now means the data set also encompasses falling and low pressure. An accompanying commentary on the depleted oxygen concentrations has also been provided. It reads:

'a slight reduction in oxygen was recorded within borehole WS01 on three occasions in May and in WS02 on one visit in May (this was peak with steady readings noted to be normal), these were then noted to recover in subsequent visits. Given the site is a back garden, it is likely that this reduction is due to vegetation and ground oxygen demand during the peak growing season, further supported by the recovery during subsequent monitoring.'

We consider the additional information provided in relation to ground gas monitoring at the site to be satisfactory and we agree that the site falls under Characteristic Situation 1.

Overall, we consider the revised Phase II report to be satisfactory. Therefore, we now recommend that Condition 8 is discharged.

Should any contamination not previously considered in either the Preliminary Risk Assessment or the Phase II Intrusive Site Investigation Report be 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, as per Condition 10.

In addition, it is unclear whether imported soil will be utilised on site. Should any material be imported on site, then we would expect details to be included in a validation report that confirms the materials suitability for end-use. It is advised that any verification sampling of imported soils is undertaken as early as possible i.e. prior to importation to avoid re-excavating unsuitable material and the possibility of cross contamination. Further testing after the imported material is on-site is also recommended. More information can be found in the Yorkshire and Lincolnshire Pollution Advisory Group Guidance - *Verification requirements for cover systems* (Version 4.1, June 2021).

Recommendations

In our response dated 22nd June 2021, we recommended that Condition 7 should be discharged.

The revised Phase II report provided is considered satisfactory and we recommend that Condition 8 is discharged.

