

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/92427 - 48, Stile Common Road, Primrose Hill, Huddersfield, HD4 6DE		
Discharge conditions 9 and 10 on previous permission 2020/91228 for demolition of existing dwelling and erection of residential development to form student accommodation with associated access and parking		
Date Responded: 8th February 2022	Responding Officer: Natalie Heaney	Responding Ref: WK/202125277
Conditions 9 and 10 were recommended by the Coal Authority and relate to the Coal Mining legacy. Environmental Health were not originally consulted on previous permission 2020/91228. We acknowledge there is an overlap with Condition 9 as the coal mining legacy features may present an environmental health risk (e.g. from mine gases or combustion). Condition 10 relates to surface stability. This is outside the remit of Environmental Health. Condition 9 – Intrusive Site Investigation Works (Coal Mining Legacy) To date Environmental Health has commented the following documents: • A Coal Investigation report by Rogers Geotechnical Services Ltd, dated 10th June 2021 (ref: C337/20/E/1956). • An Addendum titled 'Gas Monitoring at Stile Common Road, Newsome, Huddersfield' by Rogers Geotechnical Services Ltd, dated 23rd August 2021 (ref: C337/19/E/GM). • An email from Rogers Geotechnical Services Ltd, dated 7th September 2021 • a Gas Risk Assessment by Rogers Geotechnical Services Ltd, dated 18th November 2021 In our last response dated 22nd December 2021, we acknowledged that very shallow workings made the intrusive works difficult and that voids on-site may have impacted the investigation in the northern section of the site. However, we indicated that readings from only one borehole are deemed unsatisfactory and it is unlikely we will accept any additional data from only one borehole given the sensitivity of the site and the proven coal mining legacy on-site. To move forward, we requested we indicated that whilst we recognise that remedial measures are proposed to treat the shallow mine workings, we do not accept the proposals for CS2 gas protection measures. We consider the data set to remain limited as the readings were taken from one borehole only and at barometric pressures >1000mBs. As such we do not have confidence in the dataset. Therefore, to move forward we would accept the installation of Characteristic Situation Level 3 (CS3) gas protection measures at the site to secure safe occupation of the site. The combination of protection elements to be installed must also be confirmed and proposals for validation put forward. Until we receive revised proposals, we cannot recommend the discharge of Condition 9. Since then, we have received the following documents in support of Condition 9: A letter by Rogers Geotechnical Services Ltd titled 'Gas Protection Measures - Application no. 2021/92427 Stile Common Road' dated 13th January 2022 (ref: C337/19/E/R). The report includes geo-technical information which is outside the remit of Environmental		

Health, this consultation response therefore only relates to the land contamination aspects of the report.

In the letter authored by Rogers Geotechnical Services Ltd it is detailed that the building comprises a sub-basement. As such sub-basement floor and walls will confirm to BS8102:2009, Grade 2 waterproofing. A suitable gas resistant membrane will also be installed in accordance with BS8485; and finally, a pressure relief pathway beneath the concrete slab, comprising a >150mm thick layer of low fine gravel will be installed. Overall, this will achieve a score of 4.5 in accordance with BS8485 which is suitable for a CS3 site.

We accept the proposals for CS3 gas protection measures as detailed in the letter by Rogers Geotechnical Services Ltd titled 'Gas Protection Measures - Application no. 2021/92427 Stile Common Road' dated 13th January 2022 (ref: C337/19/E/R). These must be installed in accordance with the details provided on Pages 6 and 7 of the Ground Gas Letter titled 'Ref: 48 Stile Common Road, Newsome HD4 6DE' by Rogers Geotechnical Services Ltd, dated 18th November 2021 ref: C337/21/E/3443) and retained thereafter. Therefore, we recommend that Condition 9 should be discharged.

Recommendations

Condition 9 – Intrusive Site Investigation Works (Coal Mining Legacy)

We accept the proposals for CS3 gas protection measures as detailed in the letter by Rogers Geotechnical Services Ltd titled 'Gas Protection Measures - Application no. 2021/92427 Stile Common Road' dated 13th January 2022 (ref: C337/19/E/R). These must be installed in accordance with the details provided on Pages 6 and 7 of the Ground Gas Letter titled 'Ref: 48 Stile Common Road, Newsome HD4 6DE' by Rogers Geotechnical Services Ltd, dated 18th November 2021 ref: C337/21/E/3443) and retained thereafter. Therefore, we recommend that Condition 9 should be discharged.