

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/93270 - Land at, Station Road, Skelmanthorpe, Huddersfield, HD8 9BA		
Discharge of conditions 3 (construction management), 4 (temporary drainage), 5 (temporary waste arrangements), 7 (adoptable roads), 12 (waste storage and collection), 13 (tree protection), 14 (units 23 and 24 revisions), 16 (detailed drainage scheme), 17 (phase II report), 18 (remediation strategy), 23 (materials) and 31 (vegetation removal) of previous permission 2019/91657 for erection of 30 dwellings		
Date Responded: 28th April 2022	Responding Officer: Natalie Heaney	Responding Ref: WK/202128134
Conditions 4,5,7,12,13,14,16,23 and 31 are outside the remit of Environmental Health. In our response dated 11th January 2021, we commented on Conditions 3, 17 and 18. This consultation response relates to Conditions 17 and 18 only. Condition 17 – Phase II Report As part of our comments on previous permission 2019/91657, dated 4th June 2019, we indicated that we could not accept the Phase II aspect of the Contaminated Land Report by Haigh Huddleston and Associates, dated April 2019 (Ref: E19/7366/R001) as the gas monitoring was incomplete. To discharge Condition 17, the following documents have since been submitted: • A letter titled, '<i>Re: Development at Station Road, Skelmanthorpe,</i>' by Haigh Huddleston & Associates, dated 24th June 2019, (Ref: E19/7366/DP/001) • A letter titled, '<i>Further Site Investigation for Site at Station Road, Skelmanthorpe,</i>' by Haigh Huddleston & Associates, dated 22nd December 2021, (Ref: E19/7366/MD/007) The letter titled, '<i>Re: Development at Station Road, Skelmanthorpe</i>' (Ref: E19/7366/DP/001) advises that the site is adjacent to a former open cast mine, with a small portion of the potential workings encroaching on the northern boundary of the site and a present intact coal seam has been proven on-site. Therefore, ground gas monitoring has been undertaken to establish whether ground gases are migrating from nearby workings. The ground gas addendum details that four standpipes were monitored six times between 6th March and 5th June 2021. The barometric pressure ranged between 996mb and 1009mb during the monitoring visits. The maximum carbon dioxide recorded during the monitoring was 3.8% v/v. No methane was detected, and the minimum oxygen levels recorded were 20.6% v/v. Peak flow levels reached 16.2 l/h, however, the letter considers this to have been the result of high-water level in the borehole, creating a reduced response zone and increased pressure. No flow was recorded on any other event. From this, a gas screening value is calculated if 0.0038 l/h. The letter concludes that a CS1 classification is necessary and then continues to recommend the installation of a fully vented 150mm floor slab to achieve 2.5 points in accordance with BS8485:2015. The letter titled, '<i>Further Site Investigation for Site at Station Road, Skelmanthorpe</i>' (Ref: E19/7366/MD/007) confirmed that during the investigation, no evidence of either coal seams having been worked beneath the site was found. Four additional soil samples were analysed and proved 'clean' from heavy metals, asbestos, and PAH compounds. It is added that with the previous six samples, the existing topsoil has now been proved suitable for re-use. Having read the letters, we have identified several points that require clarification. Points 1 to		

4 relate to the ground gas monitoring. Point 5 relates to the additional intrusive investigation undertaken at the site.

1. First, the high water level is credited to the high flow rate reported. Yet in the appendix, the response zone for BH01 on the 6th March 2019 is shown as 0m. It is unclear how the response zone can be '0.00m'. Further clarification on the response zones of the standpipes is required.
2. In the same row for BH01 on the 6th March 2019, the water level is reported as 0.00mbgl. This suggests that there was no water ingress and contradicts the reason for elevated flow. We require further explanation to support this point.
3. The report says that no methane was detected but the appendix suggests peak methane levels of 0.5% v/v. We require the applicant to confirm the maximum concentration of methane detected during the monitoring regime.
4. Lastly the report suggests that the sites ground gas regime should be characterised as Characteristic Situation 1 and then recommends gas protection measures. Clarification regarding this point is necessary.
5. No summary table of the soil sample chemical analysis results against the relevant screening criteria has been provided in the letter relating to the further investigation. We require the applicant to clarify how the soils are deemed '*clean*' and suitable for re-use. Additional information is therefore necessary.

Therefore, we do not accept the reports provided and recommend that Condition 17 remain until further notice.

Condition 18 – Remediation Strategy

In our previous response dated 11th January 2021, we commented on a Remediation Method Statement has been prepared by Haigh Huddleston Associates, dated 22nd June 2021 (ref: E19/7366/MD/05). It remains that we are unable to recommend that Condition 18 be discharged as we require additional information in relation to Condition 17. Therefore, we are unable to recommend the discharge of Condition 18 at this time. For these reasons, Condition 18 must remain until further notice.

Recommendations

Condition 17 – Phase II Report

The information submitted in support of Condition 17 (Phase II Report) does not satisfy the requirements of Condition 17 and we recommend that the condition remains until further notice.

Condition 18 – Remediation Strategy

The information submitted in support of Condition 18 (Remediation Strategy) does not satisfy the requirements of Condition 18 and we recommend that the condition remains until further notice.