

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

Responding Date:
14th February 2023

Responding Officer:
SR

Responding Ref:
WK202302935
Parent WK202128134

Comments

We have reviewed application 2021/93270 and make the following comments and recommendations. Conditions 4,5,7,12,13,14,16,23 and 31 are outside the remit of Environmental Health. Our earlier responses dated the 11th of January 2021 and the 26th of July 2022 dealt with conditions 3 and 17 respectively, this consultation response relates to Condition 18.

Condition 18 – Remediation Strategy

In our previous response dated the 26th of July 2022 we concluded that we could not accept the Remediation Method Statement, prepared by Haigh Huddleston Associates, dated 22nd June 2021 (ref: E19/7366/MD/05), for the following reasons:

- (1) The report advises that 'As part of the development, ground levels are to be raised and lowered to achieve acceptable gradients for the proposed adoptable highway, private drives and garden area'. We have concerns that shallow coal may be encountered. We require the applicant to provide remediation proposals for areas where coal may be encountered due to the risks of combustion.
 - (2) No updated conceptual site model has been provided. This does not appear to be in accordance with LCRM guidance.
 - (3) We require more detailed information relating to the further investigation works. It is unclear how we can accept the remediation strategy at this stage.
- We recommended that Condition 18 must remain until further notice.

A further report has been received titled Remediation Method Statement for site at Station Road, Skelmanthorpe, prepared by Haigh Huddleston Associates, dated the 23rd of January 2023 (ref: E19/7366/MD/05A).

The report details the results of further investigation works at the site, these comprise 19 additional rotary bore holes, a trial trench, a site scrape and four additional soil samples.

The additional rotary boreholes identified two shallow coal seams across the site with the shallowest at a depth of 1.5m below existing site level at point BH12 the depth ranges between this and 10.3m located at BH10. Section 3.1.3 of the Report advises that 'If the coal strata is encountered within the foundation or drainage excavations, the coal seam should be immediately sealed to prevent spontaneous combustion. Any foundations should be taken beneath the coal seam to the underlying natural strata.' We believe that the developer should

know if these coal seams are to be encountered and therefore provide more specific detail as to the level of remediation to be applied.

We have concerns that points (1) and (2) in our previous response have not been addressed in that there is a credible risk that shallow coal seams on site will be exposed or cut through during groundworks. This could cause risks from combustion and ground gas migration, the current CS1 gas protection measures postulated may no longer be appropriate. We require the conceptual site model to be updated to reflect this risk. A revised site specific Remediation Method Statement should be produced.

For these reasons, Condition 18 must remain until further notice.

Recommendations

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.