

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2021/93275 - 120, Laund Road, Salendine Nook, Huddersfield, HD3 3TY		
Discharge of conditions 6 (Bins), 7 (Boundary Treatment), 8 (Remediation Strategy) and 9 (Validation Report) on previous permission 2019/90486 for the demolition of existing dwelling and erection of 7 dwellings		
Date Responded: 7th February 2022	Responding Officer: Natalie Heaney	Responding Ref: WK/202127323
Conditions 6 and 7 are outside the remit of Environmental Health. Condition 8 and 9 – Remediation of the Site and Validation Report In our previous response dated 22nd December 2021 we commented on: • Verification Report for Plot 3 Laund Road by Sub Surface North East Limited, dated November 2021 (ref: NE3941F/3) • Verification Report for Plot 4 Laund Road by Sub Surface North East Limited, dated November 2021 (ref: NE3941F/4) From that information, we considered solely Plots 3 and 4 at the development to be successfully remediated in accordance with the approved remediation strategy. We also indicated to the applicant that we still require further validation reports for the remaining plots and expect a Final Validation Summary Report to be submitted and approved before the site is brought into use. Since then, to discharge Condition 9 the following documents have been submitted: • Verification Report for Plot 2 Laund Road by Sub Surface North East Limited, dated January 2021 (ref: NE3941F/2) • Gas Membrane Installation Retrospective Tracer Gas Integrity Test Validation Report by MEC Environmental Ltd., dated 17th December 2021 (no reference) It is our understanding that the date of the Verification Report for Plot 2 Laund Road by Sub Surface North East Limited is incorrect and should read January 2022. The reports include geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the reports. In the verification report (ref: NE3941F/2), the visit to the site by Sub Surface on 25th August 2021 to verify the remedial measures is detailed. One hand dug pit was excavated to determine whether a 600mm depth of topsoil had been provided as per the agreed remediation strategy. A minimum of 600mm of brown slightly gravelly sandy topsoil was found in-situ in the rear garden of Plot 2. The soil was described as from a 'natural' source and three samples were taken to confirm the suitability for use against residential end use with homegrown produce generic assessment criteria. No elevated contaminants were identified. The front garden of Plot 2 is covered in hardstanding. A gas validation record and commentary has also been provided. A passive ventilated sub-floor clean void and gas membrane has been installed at both plots. Service penetrations were sealed using four layers of membrane. Sub Surface conclude that the membrane was installed correctly, and		

protection has been achieved. Gas protection validation records and photographs have been provided which corroborate with the report.

Following a site visit made by Natalie Heaney and Rebeca Muff from Environmental Health, we indicated in an email to the applicant dated 19th November 2021, that despite the information presented so far, we would still require photographic evidence of installation of gas protection elements in particular, the service penetrations at Plot 2. Photographs we previously had sight of were considered unsatisfactory. We also recommended continuous gas monitoring as a potential method to demonstrate gas protection elements had been fitted as per the approved remediation strategy.

In response, Northern Design partnership emailed on 11th January 2022 and confirmed that neither the developers nor Subsurface were able to locate any further photographic evidence of the completed service entry in Plot 2. Therefore, they acknowledged further evidence would be provided. However, rather than continuous monitoring, tracer gas testing has been employed.

As no inspection to confirm the installation of CS₂ gas protection measures could be verified at the time of installation, retrospective tracer gas integrity testing has been undertaken at Plot 2. This is detailed in the Gas Membrane Installation Retrospective Tracer Gas Integrity Test Validation Report by MEC Environmental Ltd., dated 17th December 2021 (no reference). The report details the tracer gas testing carried out in December. The tracer gas used was a mixture of 5% Hydrogen and 95% Nitrogen. First, a background reading was completed followed by sealing of all airbricks excluding the gas injection airbrick and gas egress air brick. Gas was then injected into the void at a speed of 20 litres/min and a blower fan was turned on to approx. 2m/s to move the gas. At no point during the test were there any elevated levels of hydrogen detected, the background level of hydrogen in air is typically below 0.5ppm. The egress point was monitored at the end of the sweep to confirm the presence of the tracer gas. From this the report concludes that the independent inspections undertaken by Sub Surface Limited during the original installation of the membrane and the subsequent retrospective tracer gas testing undertaken by MEC Environmental backs up the statement in Sub Surface limited original verification report that the protection measures installed achieve the required level for CS₂ rated site. Photographs of the tracer testing underway have been provided in the appendix of the report.

Having reviewed the reports, we are satisfied that remediation has been implemented at Plot 2.

Recommendations

From the validation information provided to date, we now consider solely Plots 2, Plots 3 and 4 at the development to be successfully remediated in accordance with the approved remediation strategy.

We still require further validation reports for the remaining plots. Furthermore, as a phased validation approach for different areas of the whole site has been agreed, we expect a Final Validation Summary Report to be submitted to and approved before the site is brought into use.

