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Hinchliffe Architecture & Design Ltd.,
24 Carr View Road,
Hepworth,
Holmfirth,
West Yorkshire,
HD9 1HX

For the attention of Joe Hinchliffe

16th September 2022

Dear Joe,

Re: Consultation Response – 2022/91841 – Land adj, 105 Highgate Lane, Lepton, Huddersfield, HD8 0HQ

We have reviewed the comments from KC Environmental Health (Pollution & Noise Control) regarding Condition 9 (Phase II Site Investigation) and Condition 10 (Remediation Strategy).

Regarding the gas monitoring at the site, JNP Group did not agree with the Phase I Environmental Desk Study produced by others that suggested there was a ground gas risk posed to the site – there are no landfills within 250m of the site, and the nearest historical backfilled pit is 230m south-west of the site; in addition, no potential ground gas sources were found on the site during our Phase II Ground Investigation. However, we undertook the programme of four visits over one month as recommended in the Phase I Environmental Desk Study anyway, with the intention of reconsidering the monitoring programme frequency and length if significant made ground considered capable of producing gas was encountered, or if significant concentrations and flows of gas were recorded during the initial four visits. Regarding the number of monitoring boreholes installed and monitored (only two rather than the usual three) – the area of the site accessible for the drilling rig was limited to just the driveway – we installed two boreholes in the driveway, and didn't feel that a third borehole in the same ground conditions in such a small area would have provided any benefit.

However, as our Phase II Ground Investigation Report outlines, the initial gas monitoring programme showed no significantly elevated gas concentrations and recorded no flow of gas from the boreholes. Therefore, in accordance with the recommendations in the Phase I Environmental Desk Study, no further gas monitoring was undertaken, and the site was characterised as CS1; furthermore, the consultation response agrees that the site should be classified as CS1, and that no gas protection measures are necessary for the proposed development, as no credible ground gas sources were identified. It is still the opinion of JNP Group that no further gas monitoring should be required at the site, as there are no potential sources of ground gas on or near to the site that could legitimately pose a risk to the proposed development, and no elevated concentrations of gases or flow readings have been recorded during the initial gas monitoring programme.

Regarding the comments on Condition 10 (Remediation Strategy), the consultation response states that "the report refers to natural soils on site being suitable for reuse as part of the capping layer. However, the additional testing referred to in the Phase II report to confirm the soils suitability for reuse has not been presented. As such, we currently consider that the soils on site are unsuitable for re-use".

The further sampling and testing of topsoil referenced in the Phase II report was suggested as a possible option to determine the extent of the contamination identified in the topsoil in HP01 and HP02, so that the reuse of existing topsoil could be considered. However, this option was not used, as it was considered uneconomical to undertake the further chemical testing on topsoil samples due to the scale of the site, and as such, the Remediation Strategy instead opts to remove all existing topsoil within 600mm of the proposed ground level and place a 600mm thick capping layer of clean topsoil and subsoil (including imported topsoil, and imported or site-won subsoils – which have been proven to be clean). The "natural soils" referred to as being suitable for reuse does not include the topsoil – "natural soils" should be taken to mean natural subsoils – i.e., the cohesive and granular soils of the weathered portion of the Pennine Lower Coal Measures Formation – and not topsoil. The removal of the topsoil is specified in point 3.5.1 in the report.

Yours faithfully,

Ciaran Jeanes MSci (Hons)

Geoenvironmental Engineer