Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2022/92509 - 9-11, Belle Vue Street, Healey, Batley, WF17 8DD		
Discharge condition 3 (Phase One Contamination Report) on previous permission 2021/93344 for demolition of existing buildings and erection of five dwellings with associated access, parking and landscaping works (modified proposal)		
Date Responded: 13th September 2022	**Responding Officer:** Natalie Heaney	**Responding Ref:** WK/202229753

Condition 3 - Phase One Contamination Report
To discharge Condition 3, a Phase I: Desktop Study and Preliminary Risk Assessment Report by GeoEnviro Solutions Ltd, dated April 2022 (ref: GES 2247-22 PI). The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the report.

The report opens by detailing the results of a former site investigation undertaken at an adjacent site. An appraisal of the site history and 9-11 Belle Vue Street and the environmental setting is then provided. The report states that in terms of on-site and off-site historical land uses within 250m of the site, 'potentially contaminative land uses comprise of, nurseries, brickworks, unspecified mills, unspecified pits, unspecified ground workings and unspecified quarries.' Notably, the report also identifies 'a refuse tip 116 m northwest of the site' and 'an inert / industrial / commercial landfill site 89 m northwest.' The site is also located within a coal mining area and a moderate risk from underground shallow coal mining has been given.

A preliminary conceptual model is presented in Section 8 of the report, and it is recommended that a Phase II investigation is undertaken 'to establish the presence of any contamination at the site, and to identify the ground conditions.' The proposed investigation is briefly outlined in Section 9.1 and includes soil sampling, chemical analysis, and a comparison of the results with current standards. It is also recommended that ground gas and groundwater monitoring is completed. The report recommends 'six return gas and groundwater monitoring visits over a period of three months' to determine the ground gas and groundwater conditions.

Having read the report, we generally agree with the findings. However, given the potential for landfill gases, mine gases and ground gases from made ground, we would expect a minimum of six ground gas and groundwater visits over three months. If any potential ground gas source is found to be worse that anticipated, then the monitoring period should be extended accordingly. All ground gas monitoring must be undertaken in accordance with best practice guidance. Notwithstanding this, we accept the report and recommend that Condition 3 is discharged.

Recommendations
Condition 3 - Phase One Contamination Report
The Phase I: Desktop Study and Preliminary Risk Assessment Report by GeoEnviro Solutions Ltd, dated April 2022 (ref: GES 2247-22 PI) satisfies the requirements of Condition 3 and we recommend that Condition 3 is discharged.