

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2022/92779 - Botham Hall Care Home, 11, Botham Hall Road, Milnsbridge, Huddersfield, HD3 4RJ
Discharge conditions 8 (Phase I Desk Study Report), 9 (Phase II Intrusive Site Investigation Report) 10 (Remediation Strategy), 11 (revised Remediation Strategy), 12 (Validation Report), 13 (electric vehicle recharging point) on previous permission 2021/93603 for erection of 10 bedroom extension to existing care home
Date Responded:
14th September 2022
Responding Officer:
Natalie Heaney
Responding Ref:
WK/202228441
Condition 8 - Phase I Desk Study Report

To discharge Condition 8, a Phase I Desk Study Site Investigation Report by Geo Investigate, dated July 2022 (ref: G22215a) has been submitted. 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 assesses the historical OS maps and describes that Botham Hall Gardens and an Engineering Works have been present on site. Other off-site land uses have been identified and include a woollen mill and railway sidings.

A walkover visit was completed on 26th May 2022. The site is described as 'comprising of hardstanding tarmac with some vegetation along the northern border of the site'. There was no evidence of visual or olfactory contamination identified. Photographs were provided on Page 10 of the report.

The report highlights the presence of possible sources of contamination which could 'potentially affect (or have affected) the site,' and a conceptual site model is provided in Figure 1 and summarised in Table 4. Potential pollutant linkages have been rated in terms of risk between very low and moderate. The report recommends 'that a Phase 2 investigation be undertaken to better explore the possible risks that have been identified.' Notably, the report indicates this should 'include contamination analyses and potentially ground gas monitoring.' Proposals for the investigation are given in more depth in Table 6 of the report.

We accept the Phase I Desk Study Site Investigation Report by Geo Investigate, dated July 2022 (ref: G22215a) and recommend that Condition 8 is discharged.

Condition 9 - Phase II Intrusive Site Investigation Report

To discharge Condition 9, a Phase 2 Intrusive Site Investigation Report by Geo Investigate dated July 2022 (ref: G22215b) has been submitted. 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 purpose of Phase 2 Investigation reported within the document submitted was 'to establish the true nature of the ground conditions at the site with regard to the potential for contamination, hazardous gas sources on site and determining appropriate foundation types.'

The investigation included sinking four boreholes (BH1 to BH4) to depths of between 3.00 and

3.40m with associated soil sampling. Borehole positions are presented in a plan in Appendix 1 of the document. Three gas monitoring wells were installed in boreholes BH1, BH3 and BH4 to allow for 'up to six (6) gas monitoring visits over a period of up to three (3) months (if appropriate).' Four samples of near surface made ground recovered from between 0.50m and 1.00m depth were also sent for contamination analysis. Samples were tested for a standard human health suite including speciated PAHs (2 samples), petroleum hydrocarbons and asbestos (3 samples). Leachate analysis was conducted on two samples from BH2 (1.00m) and BH4 (0.50m). The results were then compared to a residential end-use with plant uptake assessment criteria.

Made ground was found to a maximum depth of 2.50m and no soils contaminated any 'noteworthy visual or olfactory evidence of possible contamination.' All soil samples returned values below the adopted screening criteria. Leachate analysis found negligible concentrations of determinants. The report concludes that 'no significant risk has been identified from the soils on site directly or indirectly to end users or to ground and surface waters through leaching. No remediation will be necessary.' A revised conceptual site model is provided in Figure 1 of the report that states there is limited made ground present on site and no sources of ground gas present within the surrounding area.

The also details two initial ground gas monitoring visits. The report acknowledges that a 'further set of up to four measurements may be required to complete the gas risk assessment at the site,' and also refers to the readings as the conclusions to date are 'provisional.' The two visits were carried out between atmospheric pressures of 996 mB (falling) and 1013 mB (rising). No methane was detected and peal carbon dioxide concentrations encountered were 3.6% v/v. The minimum oxygen concentration encountered was 17.0% v/v, Flow rate was <0.1 l/h. So far, the report describes that 'gas protection measures are likely not considered for the proposed building.'

We require further ground gas data to confirm the validity of the report conclusions. Furthermore, the ground gas data presented to date is only summarised and no fully reported data appears to have been provided. This does not appear to be in accordance with best practice guidance. We also require additional justification for the sampling design i.e. why only two samples were sent for speciated PAH analysis.

For these reasons, Condition 9 must remain until further notice. We require further ground gas monitoring data and an updated ground gas risk assessment for the site.

Condition 10 - Remediation Strategy

No remediation strategy has been submitted to this service for consultation. Moreover, it is unclear at this stage whether remediation is necessary. Therefore, Condition 10 must remain until further notice.

Condition 11 - Unexpected Contamination/Implementing Remediation

No remediation strategy has been submitted and approved. Therefore, it is unclear how this condition can be considered at this time. Furthermore, groundworks must not commence until pre-commencement conditions 8, 9 and 10 have all been discharged. Condition 11 must remain until the development is complete.

Condition 12 – Validation Report

We are yet to approve a Phase II or remediation strategy report for this site. Therefore, we cannot consider the discharge of Condition 12 until further notice. Condition 12 must remain.

Condition 13 – Electric Vehicle Charging Point

To discharge Condition 13, the following documents have been submitted:

- a Wallpod:EV Technical data sheet (appended to the Discharge Statement by P&N Design, dated 17th August 2022)
- a plan titled 'proposed extension' by P&N Design, dated 17th August 2022 (drawing no. 3000-4-C)

The sheet details that the Securicharge:EV model can produce charging outputs of a minimum of 3.6 kW. The model described also provides Type 2, Mode 3 charging. The plan confirms that 1 charging point will be installed.

The information detailed satisfies the requirements of Condition 13. However, we consider the charging point model with the higher output of a 32A (7kW) to be more futureproof.

Although the information is satisfactory, we cannot recommend the discharge of this condition until the charging point are installed and made operational in accordance with the details found in the following documents:

- a Wallpod:EV Technical data sheet (appended to the Discharge Statement by P&N Design, dated 17th August 2022)
- a plan titled 'proposed extension' by P&N Design, dated 17th August 2022 (drawing no. 3000-4-C)

Once installed the charging point must be retained thereafter.

Recommendations

Condition 8 - Phase I Desk Study Report

We accept the Phase I Desk Study Site Investigation Report by Geo Investigate, dated July 2022 (ref: G22215a) and recommend that Condition 8 is discharged.

Condition 9 - Phase II Intrusive Site Investigation Report

Condition 9 must remain until further notice. We require further ground gas monitoring data and an updated ground gas risk assessment for the site.

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No remediation strategy has been submitted to this service for consultation. Moreover, it is unclear at this stage whether remediation is necessary. Therefore, Condition 10 must remain until further notice.

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