

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2023/92017 - Gomersal Hall, Oxford Road, Gomersal, Cleckheaton, BD19 4AT
Discharge conditions 3 (materials), 7 (EDS), 10 (Phase I Desk Study Report), 11 (Phase II Intrusive Site Investigation Report), 16 (construction traffic) on previous permission 2020/90350 for demolition of existing buildings and erection of 7 dwellings and associated garages (within a Conservation Area)
Date Responded:
10th August 2023
Responding Officer:
NH
Responding Ref:
WK/202321398

Conditions 3, 7 and 16 are outside the remit of Environmental Health.

Condition 10 – Preliminary Risk Assessment (Phase I Desk Study Report)

Condition 10 on previous permission 2020/90350 requires the submission of a Preliminary Risk Assessment (Phase I Desk Study Report) to satisfy the requirements of the condition.

A Phase 2 Investigation report prepared by Rogers Geotechnical Services Ltd, dated June 2023 (ref: C1772/21/E/4286) has been received in support of the application. We understand from the Phase 2 report that a Phase 1 report has also been authored.

As per Land Contamination Risk Management (LCRM) guidance, it is imperative to start with a preliminary risk assessment to establish whether there are any potentially unacceptable risks arising from contamination at the site. In the absence of a Phase 1 assessment, essential information regarding the site's historical land use, its setting, and potential risks associated with contaminants to receptors remain unspecified.

For these reasons, Condition 10 must remain until further notice.

Condition 11 – Phase II Intrusive Site Investigation Report

To discharge Condition 11, a Phase 2 Site Investigation Report by Rogers Geotechnical Services Ltd, dated June 2023 (ref: C1772/21/E/4286). 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 details fieldwork two phases of fieldwork, conducted in 2021 and 2023. The initial fieldwork involved the boreholes, trial pits, and gas monitoring standpipes. Additional work was conducted between May 2023, due to revised development plans, including the drilling of additional boreholes, and gas monitoring. All ground gas readings undertaken to date were at atmospheric pressures of between 977mb and 1018mb.

When the results were compared against a residential with plant uptake end-use scenario, the results of the investigation have concluded that the site is generally uncontaminated with respect to the proposed residential end use.

Regarding ground gas, the monitoring visits revealed maximum methane and carbon dioxide concentrations of 0.1% v/v and 4.7% v/v, respectively. Oxygen levels were in excess of 16.2% v/v. Normal uncontaminated sites have around 20% oxygen by volume and low carbon dioxide levels. Additionally, a maximum flow rate of 0.1 l/h was recorded. The resulting gas screening values for both methane and carbon dioxide resulted in a CS1 classification.

The report concludes that no remediation is required. However, it recommends that any fill materials, whether site-won or imported, must adhere to specified criteria which are provided in the report.

Having reviewed the report, the sample locations do not appear to cover the entire site as indicated by the red line boundary. Therefore, we request justification for the sampling methodology, particularly the number of samples and the sampling rationale. In addition, we cannot fully assess the report in the absence of a Phase 1 report.

For these reasons, Condition 12 must remain until further notice.

Recommendations

Condition 11 – Preliminary Risk Assessment (Phase I Desk Study Report)

No Phase 1 report has been provided. Therefore, Condition 11 must remain until further notice.

Condition 12 – Phase II Intrusive Site Investigation Report

We require additional information to assess the information provided in support of Condition 12. Therefore, we recommend that Condition 12 remains until further notice.