

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2023/91801 - Land to the North of, Cumberworth Road, Skelmanthorpe, Huddersfield, HD8
Discharge condition 12 (phase 1) (Remediation Strategy) on previous permission 2019/90151 for erection of 190 dwellings and associated landscaping and infrastructure
Date Responded:
 17th July 2023

Responding Officer:
 NH

Responding Ref:
 WK/202319927

Condition 12 – Phase 1 Remediation

Condition 12 on previous permission 2019/90151 and NMA 2023/91201 require the submission of a validation report to confirm that remediation has taken place at the site in accordance with the approve documents. Phase 1 of the site as per the NMA 2023/91201 covers plots 1 to 24, 164 to 189.

Several documents authored by Haigh Huddleston & Associates have been received in support of application to discharge Condition 12:

1. Gas Membrane Validation Plots 1-7 (REF: 7612L001)
2. Gas Membrane Validation Plots 8-14 (REF: 7612L002)
3. Gas Membrane Validation Plots 15-23 (REF: 7612L003)
4. Gas Membrane Validation Plots 166-174 & 188 (REF: 7612L004)
5. Gas Membrane Validation Plots 166-175 & 188 (REF: 7612L004A)
6. Gas Membrane Validation Plots 176-179 & 180-182 (REF: 7612L005A)
7. Gas Membrane Validation Plots 186-187 (REF: 7612L006)
8. Gas Membrane Validation Plots 165 & 189-90 (REF: 7612L007)
9. Gas Membrane Validation Plots 24-32 & 36-50 (REF: 7612L009A)
10. Gas Membrane Validation Plots 136-139 & 183-184 (REF: 7612L001)

NB: The provided documents solely cover the gas protection aspect of the agreed remediation. Consequently, we are unable to fully evaluate the application for discharging the validation of the initial phase of remediation conducted on this site.

The reports generally demonstrate the installation of gas protection measures that include a fully ventilated void (150mm) and a ground gas membrane for Plots 1-7, 8-23, 166-184, 186-187 and 189-190 to achieve the necessary score for a CS2 site.

After reviewing the documents, we require further clarification. There are two key points that apply to all ten documents: (a) none of the documents seem to provide commentary for the attached photographs, and (b) the approved remediation strategy stated that a visual inspection **and** a pick test of the gas membrane would be conducted, but there is no evidence of this. We expect the photographs to be clearly labelled, and we the applicant to confirm whether pick testing was carried out to ensure the integrity of the welded and taped joints. A visual inspection alone is insufficient.

There are several documents where additional attention is also necessary:

Gas Membrane Validation Plots 8-14 (REF: 7612L002)

The photographs suggest the absence of surface preparation prior to laying the ground gas membrane (see photographs on Page 10 and 11 of the report). This can compromise the gas

membrane. As per good practice guidance, debris is likely to pierce gas membrane. Therefore, the applicant must provide the LPA with the necessary confidence that the membrane was not damaged and has been installed correctly at these plots.

Gas Membrane Validation Plots 166-174 & 188 (REF: 7612L004) & Gas Membrane Validation Plots 166-175 & 188 (REF: 7612L004A)

The photographs provided do not appear to reflect the checklists provided in that the membrane appears to change (Page 9 and 10). The applicant must provide a commentary for these photographs and clarify which plots have a compliant membrane.

Gas Membrane Validation Plots 176-179 & 180-182 (REF: 7612L005A)

The photographs provided do not appear to reflect the checklists provided in that the membrane appears to change (Page 9 and 10). The applicant must provide a commentary for these photographs and confirm the plots numbers.

Gas Membrane Validation Plots 165 & 189-90 (REF: 7612L007)

The photographs provided do not appear to reflect the checklists provided in that the membrane appears to change (Page 9 and 10). The applicant must provide a commentary for these photographs and confirm the plots numbers. The joining tape product must also be confirmed.

Gas Membrane Validation Plots 24-32 & 36-50 (REF: 7612L009A)

This document covers plots that fall outside of Phase 1. However, plots 24-26 is accepted as part of the current application.

Recommendations

Condition 12 – Phase 1 Remediation

For these reasons, we do not accept the application to discharge Condition 12 in relation to Phase 1 remediation works.