

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2024/91995 Calder View, Lower Hopton, Mirfield, WF14 8JD
Discharge of details reserved by condition 9 (gas protection) of previous permission 2017/90557 for erection of 99 dwellings
Responding Date:
16th January 2026
Responding Officer:
SR
Responding Ref:
WK202606753
Comments

Further to our comments dated the 30th of September 2024 a letter by Eastwood consulting Engineers, ref: 48808-ECE-XX-XX-CO-C-0004 KE/JB, dated the 12th of February 2026 has been submitted.

In our earlier response we required additional information of verification for gas protection measures for plots 205-208, 232-234, 247, 260,280. For clarification the wording contained within the implementation plan by Lithos required the following: -

5.2 For a CS2 classification, a “gas score” of 3.5, in accordance with BS8485: 2015, is required.

It is understood that this will be achieved as follows:

- Minimum 150mm ventilated sub-floor void 2.5 points
- Beam & block floor 0 points
- Proprietary gas-resistant membrane 2 points

5.3 Sub-floor ventilation will be provided via airbricks each with a free airflow area of c. 6,500mm², installed in at least 2 opposite walls, to provide minimum ventilation of 1,500mm²/m run of wall.

5.4 A proprietary gas-resistant membrane will be installed by an appropriately qualified and experienced contractor, using the manufacturer's recommended proprietary components.

5.5 Independent inspections will be undertaken by Lithos at a minimum frequency of 1 in 20 plots.

5.6 At least two visits will be required per plot subject to independent inspection; one to verify the sub-floor ventilation and the second to inspect the membrane.

5.7 Site staff will maintain sign-off sheets, including photographs, for all other plots.

5.8 On completion, all of the inspection records will be compiled into a verification report to be issued by Lithos.

We have reviewed the letter and make the following comments:

The letter has not provided any information on the ventilated sub floor requirements for the whole site.

There is no documentary evidence of gas protection measures for plots; 232,233,241,246,247,259,260,265,267,280. The letter suggests we should rely on satellite images of the site for verification purposes, which does not follow the implementation plan by Lithos or good practice guidance.

The letter author informs; *“It is likely that the gas protective measures for these plots would have been installed at the same time and Remedial measures have been installed broadly in accordance with Lithos’ Implementation Plan.”* Words such as “likely and broadly” do not provided a sufficient level of confidence in the information provided, we therefore do not accept the additional information provided and condition 9 (gas protection), must remain.

Informative

The applicant is reminded, responsibility for securing safe development on land affected by contamination rests with the developer (and/or landowner). Any new documents must follow the approved implementation plan by Lithos, CIRIA C735-Good practice on the testing and verification of protection systems for buildings against hazardous ground gases and YALPAG-Verification Requirements For Gas Protection Systems, Technical Guidance for Developers, Landowners and Consultants.