

Consultation Response from: KC Environmental Health (Pollution & Noise Control)

2025/92529 Land adjacent to 67 Chapelgate, Scholes, Holmfirth, HD9 1SX

Discharge of details reserved by conditions 6 (CEMP: Biodiversity), 10 (Phase II Intrusive Site Investigation Report), 11 (Remediation Strategy), 16 (retaining walls) on previous permission 2022/92406 for erection of 10 affordable dwellings, with access from Chapelgate and associated works, including resident play zone

Responding Date:
24th September 2025

Responding Officer:
SR

Responding Ref:
WK202528733

Comments

Condition 10 (Phase II Intrusive Site Investigation Report)

In support of the discharge of condition 10 a Geoenvironmental Appraisal by JNP Group, ref: B24367-JNP-XX-XX-RP-G-1002, Date: June 2022, 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 aspect of the report.

The report provides a summary of the earlier Phase I Geo-Environmental Report undertaken by JNP Group 'B24367-JNP-XX-XX-RP-G-1001' dated January 2022. We commented on an earlier version of the Phase 2 report, which required completed gas monitoring data, this has now been provided.

The fieldworks were undertaken on the 16th of February 2022 including, seven dynamic sampling boreholes and four hand pits. Additional gas monitoring visits were conducted between March to May 2022.

The rationale for the location of trail holes is given in table 6-1, the stratigraphy encountered is summarised in Table 8-1 and described as; *"A variable thickness of made ground was found to be underlain by both granular and cohesive Rough Rock, this graded from soft, very loose to strong sandstone with increasing depth. This strong sandstone was encountered at the base of all window sampler holes. This varied from 1.40m bgl in WS01 to 5.50m bgl in WS07. In the north-western corner of the site, a considerable thickness of made ground was encountered."* Materials encountered included ash, and fragments of broken glass, pottery, and tarmac, a white fibrous material was tested and found not to be asbestos.

The report informs; *"Groundwater was found in location WS05 at 1.20m bgl, this is noted to be within the gravelly clay made ground and as such is possibly perched groundwater. Subsequent monitoring visits has indicated that limited groundwater is present within the boreholes of WS02 and WS06."*

A suite of testing was conducted on 13 samples (11 from made ground/2 from natural soils), from the site. The scheduled soil chemical analyses are listed in table 7-2. Laboratory results are presented in Appendix I of the report. Section 11 provides commentary on the results of the chemical analysis, informing:- mercury, selenium, benzene, toluene, ethylbenzene, p & m-xylene, o-xylene, MTBE, phenols, TPH aromatic bands C5-C12 and TPH aliphatic bands C5-

C10, were recorded at concentrations less than their respective limits of laboratory detection. No asbestos was identified in any of the samples tested.

Some exceedances of heavy metals, petroleum hydrocarbons and PAH's were identified in samples. Explanatory commentary is offered to identify sources.

In relation to the gas risk at site we are informed 6 monitoring visits were undertaken at 3 locations, flow rates were minimal throughout the period of monitoring the methane concentration remained below detection levels, and a maximum concentration of carbon dioxide of 1.9% was recorded in WS06. Gas screening value calculations based on the data indicate a gas screening value of CS1 for the site.

An updated conceptual model and Risk Assessment is presented in Table 13-1, informing; - *“Elevated concentrations of heavy metals and hydrocarbons are present within the made ground and natural topsoil in localised parts of the site. Remediation is required at the site to reduce the risks to acceptable levels. No elevated concentrations of gases have been recorded.”* The report author has concluded that as no mobile species of metals or hydrocarbons are present a low risk to groundwaters has been attributed.

We acknowledge the report and make the following recommendations.

Condition 11 (Remediation Strategy)

We have reviewed the submitted Options Appraisal and Remediation Strategy by JNB Group, ref: B24367-JNP-XX-XX-RP-G-1003, dated April 2024. Due to elevated levels of contaminants found during the intrusive investigation a strategy to remove this contamination has been put forward. Section 4.4 provides details of the materials to be excavated from site.

In relation to clean cover systems, we do not accept that front gardens can be distinguished from rear gardens for the purposes of adequate clean cover systems. We also wish to see commentary regarding what remediation, if any, will be carried out in the other wildlife/green areas shown on the site plan within the strategy, for example are these accessible by the public (fenced off), are these parts of the site subject to disturbance during works or remain untouched?

The report clarifies the action that must be taken if unexpected contamination is discovered during construction and how excavated soils will be quarantined prior to removal from site. Details of testing for potential site won materials is listed. JNB will review all documentation in association with the site remediation and provide necessary documented evidence for the purposes of validation.

We acknowledge the report and make the following recommendations.

Recommendations

Condition 10 Phase II Intrusive Site Investigation Report

We have read the Geoenvironmental Appraisal by JNP Group, ref: B24367-JNP-XX-XX-RP-G-1002, Date: June 2022. On the basis of the professional judgement of the report author and the evidence and interpretations presented, we recommend discharge of the condition.

Condition 11 (Remediation Strategy)

Due to the reasons given above we do not accept the Options Appraisal and Remediation Strategy by JNB Group, ref: B24367-JNP-XX-XX-RP-G-1003, dated April 2024, condition 11 remains.