

Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2026/90507 – Land adj. 21 Westcliffe Rise, Cleckheaton, BD19 5HX		
Discharge of details reserved by conditions 4 (bat and bird boxes), 5 (bins), 6 (Phase II Report), 7-11 (Remediation Strategy), 12 (boundaries) on previous permission 2025/91577 for erection of two semi-detached dwellings		
Date Responded: 19th June 2026	Responding Officer: KB	Responding Ref: WK/202617658
The applicant has applied to discharge Conditions 6 (Phase II Report) and 7-11 (Remediation Strategy) on the previous permission (2025/91577). Condition 6 was successfully discharged on 6th April 2026 (Our Ref: WK/202605723). We can now comment on Condition 7 (Remediation Strategy). Condition 7 – Remediation Strategy For the purpose of discharging condition 7 (Remediation Statement), on previous permission 2025/91577, a report by MDJA has been received 'Remediation and Verification Strategy of 21 Westcliffe, Cleckheaton, BD19 5HX' (April 2026 Ref: 4536). 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 reports. We have read and reviewed the report and make the following observations. The Remediation and Verification Strategy by MDJA confirms that, although the site is suitable for residential use, mitigation measures are required to manage risks from made ground and ground gas. The main remediation approach is the provision of a clean cover system in garden and landscaped areas (typically 450mm subsoil and 150mm topsoil) where made ground remains, alongside basic gas protection measures for dwellings in line with a CS2 classification requiring a minimum protection score of 3.5 (e.g. gas membrane and sub-floor ventilation). The strategy also includes standard construction controls such as site clearance, appropriate handling and disposal of any waste soils (*good site management etc), and health and safety measures for groundworkers. Imported soils must be tested and verified prior to use in accordance with YALPAG guidance, with strict requirements on quality, sampling, and placement to avoid contamination. Verification requirements are detailed in the MDJA report and include inspection, testing, and photographic evidence to confirm the correct thickness and suitability of clean cover, as well as full installation and validation of gas protection systems by a competent and independent professional. MDJA state that a Verification Report will be required on completion to demonstrate that all remediation works have been carried out in accordance with the approved strategy and that the site is suitable for its intended use.		

COMMENTS

The Remediation and Verification Strategy by MDJA generally aligns with current guidance, however, there are several gaps that should be addressed prior to discharge of the condition.

In particular, the document lacks sufficiently detailed site-specific drawings and design information for the proposed gas protection measures (including membrane layout, jointing, and integration with foundations) and how installation of this will be verified, which is required to demonstrate compliance with BS8485 in practice and how this will be verified.

While verification procedures for the importation of materials to the site is outlined, the extent and frequency of verification across all plots and areas is not clearly defined or justified, and should be explicitly agreed. There is also no information regarding the reuse of site won materials. The strategy would also benefit from clearer identification and mapping of areas requiring clean cover, distinguishing where made ground remains and where cover will not be required.

Finally, although material testing and verification requirements are included, the protocol for documenting and presenting verification evidence (e.g. tracking of imported materials, sample locations, and coverage) is not fully detailed, and should be expanded to ensure that compliance can be confirmed in the Verification Report. These matters should be clarified and agreed before the condition can be formally discharged.

Recommendations

Condition 7 (Remediation Strategy) should not be discharged until a revised remediation strategy has been submitted and approved, addressing the issues outlined above.