Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2026/91218 The Priory, Whitechapel Road, Cleckheaton		
Discharge of details reserved by condition 10 (Remediation Strategy), 11 (Remediation) and 12 (Validation Report) on previous permission 2025/90655 for demolition of existing pub and erection of a new two storey building comprising 8 self-contained supported living flats with ancillary staff facilities, single storey summer house and other associated works		
Date Responded: 19th June 2026	**Responding Officer:** KB	**Responding Ref:** WK202617167

Condition 10 – Remediation Strategy

For the purpose of discharging condition 10 (Remediation Statement), on previous permission 2025/9065, a letter from Haigh Huddleston & Associates has been received regarding the 'Remediation Method Statement for The Priory, Whitechapel Road, Cleckheaton' (dated 20/04/2026 - E25/8253/MD/003).

The letter 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 letter from Haigh Huddleston and make the following observations.

The Haigh Huddleston letter is based on information included in previous Phase 1 Environmental Desk Study (RGS. Phase 1 Environmental Desk Study & Coal Mining Assessment. Ref: 17/01/2025 C4800/24/E/7331) in which the preliminary conceptual site model identifies potential risks to human health and groundwater, stating that these are generally characterised as low to moderate overall.

Intrusive investigation works undertaken by Rogers Geotechnical Services (RGS. Phase 2 Geo-environmental Report. Ref: 31/01/2025 4800/24/E/7331) which identifies the presence of made ground across the site to depths of 1.65m underlain by weathered siltstone, sandstone and mudstone recovered as gravels and gravelly clays, with elevated concentrations of lead and arsenic exceeding levels suitable for residential end use.

Further to the site investigation being discussed, Haigh Huddleston conclude that the revised Conceptual Site Model indicates a risk to developers and future site residents is low and remediation measures will be required.

It is also noted in section 1.4 of the Haigh Huddleston letter that no investigation beneath the intact buildings was possible and that further investigation was recommended by RGS.

The remediation objectives aim to manage contaminated soils through relocation or removal, address structural constraints, regrade the site, and install a clean cover system suitable for residential end use.

The remediation strategy proposes a combination of measures. These include:

- The reduction in levels and excavation of made ground where required.
- Relocation of contaminated materials beneath hardstanding areas where appropriate.
- Removal of excess contaminated materials off site where it cannot be reused.
- The installation of a clean cover system comprising 600mm of clean soil in areas of retained made ground and 300mm of clean topsoil in areas without made ground.
- The regrading of the site including infilling with suitable material.
- The importation and testing of clean soils in accordance with defined screening criteria which is summarised in an annex to the Haigh Huddleston letter.

The Haigh Huddleston letter confirms that ground gas monitoring has classified the site as Characteristic Situation 1 in accordance with relevant guidance, and therefore no gas protection measures are proposed.

In terms of verification, the strategy proposes that remediation is completed in accordance with Yorkshire and Lincolnshire Pollution Advisory Group (YALPAG) guidance for verification requirements of cover systems specifically:

- Photographic records of excavation and material placement.
- Any unexpected contamination to be investigated further and dealt with appropriately.
- Waste transfer documentation for removed soils.
- Testing and certification of imported materials.
- Trial pits to confirm cover thickness.

COMMENTS

We have reviewed the document provided and have the following comments.

The remediation strategy provides a general outline of the proposed remediation approach, including excavation and re-use of made ground under hardstanding areas, provision of cover systems, site regrading, and the importation of clean materials. The report also includes details relating to site management procedures, imported fill acceptance criteria and proposals for verification. However, the submission does not demonstrate that the site will be made suitable for its intended use.

1. Whilst limitations in the original site investigation have been acknowledged (notably the presence of the existing building and associated cellars preventing investigation of parts of the site), no provision has been made within the remediation strategy for further investigation following demolition and enabling works to address these data gaps. This uncertainty has not been accounted for within the remediation or verification proposals, and reliance on unexpected contamination procedures alone is not considered sufficient in this instance.

2. The remediation strategy relies on a revised conceptual site model that concludes overall risks are “low”. This is not considered to be supported by the findings of the RGS Phase 2 Geo-environmental report, which identifies high risks to end users and a moderate risk to groundwater, including the presence of a Secondary A aquifer beneath the site. A fully refined conceptual site model addressing all identified pollutant linkages, including groundwaters, has not been provided.

3. It is unclear how the reported maximum concentrations for lead and arsenic in Section 2.3 have been derived, as the values presented do not appear to correspond with the underlying analytical data in the RGS report. This discrepancy raises concerns regarding the accuracy and reliability of the interpretation of the site investigation results and the conclusions drawn from them.

4. The remediation strategy assumes that underlying natural soils or sub-base materials are suitable for retention beneath cover systems. However, no verification sampling or laboratory testing of formation levels is proposed to confirm this assumption. In the absence of additional testing, it cannot be demonstrated that residual contamination is not present within retained soils.

5. Whilst the strategy refers to the importation of clean materials, there is insufficient information provided regarding the characterisation, source verification and chemical suitability of imported soils in accordance with current good practice. A clear materials management and verification approach for imported materials has not been set out.

6. The remediation strategy does not include a robust or detailed verification plan in accordance with current good practice.

Recommendation
In its current form, the remediation strategy fails to demonstrate that the site will be made suitable for its intended use in accordance with relevant guidance.

Condition 10 (Remediation Strategy) should not be discharged until a revised remediation strategy in accordance with current best practice has been submitted and approved, addressing the issues outlined above. We recommend that the planning officer reconsults with Environmental Health once new information has been received.

With respect to the conditions 11 and 12, no information has been provided to support the discharge of these conditions and Environmental Health are not in a position to comment further.