



**DEPARTMENT OF
OPERATIONS**

Tom Beirne
Bury Council Planning Department

Date 5 June 2024
Reference CL958.050624.1

Dear Tom,

Topping Mill, Topping Street, Bury, BL9 6DR, Planning Application: 70033 – Contaminated Land

I write regarding the request to discharge Conditions 3 and 5 of the above planning application. The Environment Section has received copies of the following reports:

- Asbestos Refurb/Demo Survey, Textile Mill, Topping Street, Bury BL8 6DR, DJ Surveying, Reference: DJ181109B, 9 November 2018.
- Soil vapour and ground gas risk assessment: Topping Mill, Topping Street, Bury, Ground First, Reference: 4332R1 Final, 24 January 2024.

The Environment Section has reviewed the above information in order to assess whether the following items requested in my previous correspondence have been adequately addressed:

1. A pre-demolition asbestos survey report.
2. Site Investigation proposal.
3. Site Investigation and Risk Assessment Report.
4. Remediation Strategy, if required.
5. After completion of site works, a verification report is required to validate that the work undertaken conforms to the remediation proposals received and agreed by this Section.

The site is occupied by an unused industrial mill building, which has previously been in use as a light industrial works building. Surrounding uses have included residential and works. There are no registered landfill sites within 250m of the site. The site is situated above the Lower Coal Measures Secondary Aquifer which is overlain by Glacial Till. The site is not situated within a Radon Affected Area.

It is understood that the proposed development comprises the change of use from an industrial building to 15 no. apartments.

1. A pre-demolition asbestos survey report

A pre-refurbishment asbestos survey report has been submitted. The survey identified a number of asbestos containing materials (ACM) (chrysotile and crocidolite) and suspected ACM within the building as follows:

- Vinyl floor tiles, floor tile adhesive and panel to an ironing board in the ground floor storage area.
- Pipe insulation, cement flue and boiler components in the basement boiler room.
- Vinyl floor tiles in the stairway.
- Electrical components in the ground floor workshop.
- Toilet cistern in the ground floor female WC.
- Flash pad in the first floor workshop.
- Sink pad in the kitchen area.

Statements of Completion (produced by REC) for ACM removed from the building between 25 June and 1 July 2019 by RS Asbestos Ltd have been received within the Ground First report. A site inspection carried out by Ground First in January 2024 confirm that all identified materials had been removed. This Section is satisfied that the ACM identified in the survey has been removed.

2. Site Investigation proposal

A site investigation proposal has previously been received and approved by this Section on 11 December 2023. Given that the Planning redline boundary comprises the building footprint and there will be no external space included in the development, the proposal to focus on gas and vapour risk appeared reasonable.

3. Site Investigation and Risk Assessment Report

The site investigation was undertaken on 10 January 2024 and comprised the following:

Technique	No.	Comments
Vapour pins	2	Installed through the existing ground slab to monitor sub-slab soil gas. 2 no. 16mm holes were drilled to install the vapour pins (VP1 and VP2).
Soil gas sampling	1	Gas sample taken from vapour pin VP1 and analysed for a suite of analysis that included bulk ground gases and VOCs.
PID internal survey		Indoor air monitoring for VOCs within the current building across the ground floor and cellar areas. Readings were taken along the floor and wall joints plus any service entry points. A third 16mm hole (DRILL1) was drilled through the concrete slab to access its thickness and to take PID readings.

The three 16mm holes identified a concrete ground slab (between 150mm and 325mm thick) over 'soft ground'. The existing concrete floor slab was found to be in good condition with minimal service entry points. It is understood that an additional screed layer and Visqueen (damp proof) membrane will be laid across the entire ground floor.

All PID readings taken within the building and from beneath the slab (VP1, VP2 and DRILL1) were below 0.01ppm, however it is noted that the building was well ventilated due to missing windows and a poor state of repair.

The gas sample taken from VP1 did not identify the presence of any elevated concentrations of methane or carbon dioxide (<0.05 % LOD). Several VOCs were present in the sample above their respective LODs. These results were initially screened against USEPA Resident Air Screening Levels, and a number of VOC exceeded these criteria including 1,1-Dichloroethane, DCE, Acetonitrile, Benzene, Tetrachloromethane, Trichloromethane, Ethylbenzene, Methylene chloride, MTBE, PCE, TCE and Vinyl Chloride. Subsequently, vapour transport modelling was carried out using the CLEA model. Average daily exposure (ADE) and Health Criteria Values (HCV) were calculated for each of the contaminants of concern. Based on these values, the concentrations of VOCs identified beneath the slab are not considered to present an indoor vapour risk to human health.

This Section is satisfied that the risks to human health at the site are low.

4. Remediation Strategy, if required

Although the consultant considers the risks to human health at the site to be low, the following remedial actions have been recommended in addition to the installation of a Visqueen membrane and screed layer:

- As a precautionary measure, (where feasible) some passive ventilation is maintained within the cellar room (which includes windows positioned above the external ground level) in order to avoid the potential accumulation of any localised soil vapours or ground gases.
- The drainage cover present within the cellar room is appropriately sealed, in order to avoid the potential ingress of any localised soil vapours or ground gases.
- The three 16 mm diameter holes recently drilled within the building floor slab (at locations VP1, VP2 and DRILL1) should also be appropriately sealed prior to any further development works.

Verification information will be required to demonstrate that these recommendations and the installation of the Visqueen Membrane/screed layer have been completed.

5. After completion of site works, a verification report is required to validate that the work undertaken conforms to the remediation proposals received and agreed by this Section

Verification information will be required in due course.

Conclusion

In order for this Section to be satisfied that this development does not pose a risk to human health or the environment, the following information needs to be submitted to the Council for approval:

- (i) After completion of site works, a verification report is required to validate that the work undertaken conforms to the remediation proposals received and agreed by this Section.

This Section is satisfied that the requirements of Conditions 3 and 5 have been met and that this condition can now be recommended for discharge.

Condition 4 requires the submission and approval of a verification report.

All parties involved with waste and soil movement at the site should be aware that materials illegally deposited or deposited at inappropriate sites may be subject to relevant landfill taxes, payable by all parties. Only robust due diligence is a defence against joint liability. Illegal deposits can include moving waste soil material on sites, or between sites, without the appropriate permits, exemptions or duty of care.

Please Note: The Environment Section has used all reasonable endeavours to determine the risk from contaminated land and ground gas based upon the information available to it. However, the comments made above should not be taken to imply that the land is safe or otherwise suitable for this or any other development. The ultimate responsibility for safe implementation of the development scheme resides entirely with the landowner and/or Planning Applicant.

Please do not hesitate to contact me if you require any clarification of the above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rebecca Jones', written in a cursive style.

Rebecca Jones
Environmental Protection Officer

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