

Bury Metropolitan Borough Council
Town Hall
Knowsley Street
Bury
Lancashire
BL9 0SW

Our ref: SO/2024/124613/01-L01
Your ref: 70222
Date: 23 January 2025

Dear Sir/Madam

DISCHARGE OF CONDITIONS 4, 6 AND 8.

FORMER MONDI/HOLCOMBE MILL, BRIDGE STREET, RAMSBOTTOM, BURY, BL0 0BS

Thank you for referring the above application for the discharge of conditions 4, 6 and 8 to the Environment Agency. We would like to make the following comments.

Environment Agency position

We have reviewed the following document for the council and, separately on behalf of the applicant through the Environment Agency's pre-application, enhanced, advice and guidance service:

- Desk Study & Ground Investigation Report for Mondi Site, Ramsbottom (dated August 2019) (rev. 4 dated July 2024) (report ref. 19ECH016/DSGI) by Betts Geo Environmental Ltd, and a
- Remediation Strategy Report for Mondi Site, Ramsbottom (dated June 2023) (Rev. 3 dated July 2024) (report ref. 19ECH016/RS) by Betts Geo Environmental Ltd, and A letter report from Betts Geo Consulting Engineers Ltd (dated November 2024) responding to earlier submissions.

Based on the submitted information that has been provided we are not able to recommend that conditions 4 (Ground investigation and assessment), condition 6 (Borehole decommissioning) and condition 8 (Piling) can be discharged at this time.

Condition 4

We believe that further ground investigation is needed. We have reviewed the latest correspondence from the applicants' environmental consultants and advise that we are aware of the latest CIRIA (C819) guidance document regarding PFAS in soils and groundwater.

Environment Agency
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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The Environment Agency has seen previous, pre-publication, versions of the guidance. We are comfortable that our narrative and review of previous submissions is in line with this guidance as well as other technical reports on PFAS and the known link between paper manufacture/recycling and per- and poly fluoroalkyl substances.

We agree that the areas of historic landfill are likely to have a much higher instance of PFAS contamination, but this does not diminish the possibility of this contaminant of concern being present elsewhere on site.

We believe that sampling of soils and, where appropriate, site surfaces is an element of investigation which needs to be addressed and is in keeping with existing land contamination risk assessment and management guidance as well as more topic specific guidance especially where these materials are intended for retention and there is a requirement for the developer to show that they are fit for purpose and suitable for their intended use.

We note your reference to the recently published CIRIA (C819) guidance. The excerpt that is included in this response is only a snapshot of the wider guidance document that the Environment Agency has fed into during its development. The wider guidance speaks to the need to fully understand the site-specific nature of the site, the risks and the work needed to remediate and mitigate those risks – in line with land contamination risk assessment and management guidance.

We are therefore happy with our previous comments regarding TOP Assay assessment in the context of investigating, assessing and where necessary managing the risks from potential transformations of the PFAS geo-chemistry.

We welcome your additional investigation of areas which were subject to waste disposal but believe the absence of additional investigation across the wider site is a significant and important information gap such that we are likely to recommend to the local planning authority that insufficient information and assessment has been undertaken to support future development of the site and we would not be able to recommend the discharge of relevant conditions regarding land contamination and risks to environmental receptors.

Condition 6

We advise that a methodology in line with the Environment Agency's guidance on decommissioning redundant boreholes and wells (https://webarchive.nationalarchives.gov.uk/ukgwa/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6478_8cbe6f.pdf) should be developed to assist with the discharge of this condition. This methodology should include scope to deal with contemporary as well as historical boreholes at site.

Condition 8

We advise that where piling and ground improvements are necessary then a suitable piling risk assessment is necessary. We advise that the Environment Agency's guidance on [Piling in layered ground: risks to groundwater and archaeology \(Science Report SC020074/SR\)](#) for additional support.

Please forward a copy of this letter to the applicant.

Yours faithfully

Mrs. SYLVIA WHITTINGHAM
Planning Advisor

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