



**DEPARTMENT OF
OPERATIONS**

Dean Clapworthy
Bury Council Development Control

Date 22 August 2024
Reference CL295.210824.1

Dear Dean

Site of Radcliffe Leisure Centre, Spring Lane, Radcliffe, Manchester, M26 2SZ, Planning Application: 70002 – Contaminated Land

I write regarding the above planning application. The Environment Section has received copies of the following reports:

- Remediation Validation Report – Temporary Accommodation, Star Academy, Radcliffe, Brownfield Solutions, Reference: TM/C5394/13333 Rev A / P01 Final, 14 August 2024.

The Environment Section has reviewed the above information in order to assess whether the following items requested in my previous correspondence (CL295.140324.1) have been adequately addressed:

1. Validation information to confirm that the asbestos containing materials identified have been removed, including waste transfer documentation.
2. A materials management plan, if the CL:aire Definition of Waste Code of Practice is to be used.
3. 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 was formerly in use as Spring Lane School (a pupil referral unit) and a Leisure Centre including a temporary swimming pool (now demolished), and a former electricity sub-station (retained on-site). Current uses in the surrounding area include housing, a Metrolink Line and station and commercial buildings. Previous uses at the site have included open land associated with a farm, followed by railway land including a goods shed and goods station. By 1979 the site had been developed as a school. Surrounding former land uses have included a former railway line, a gravel pit, mineral water works, iron works, a rope walk, sawmill, unspecified works, a colliery and residential developments. The site is within 250m of one landfill site, known as Darbyshire Street Landfill, which is an infilled railway cutting. There are two surface watercourses are situated within 250m of the site including the Manchester, Bury and Bolton Canal which flows along the northwest boundary of the site and the River Irwell to the south. The site is situated above the Carboniferous Middle Coal Measures Secondary A Aquifer which is overlain by River Terrace Deposits. Deposits of made ground exist at the site.

It is understood that the proposed development comprises the demolition of existing school buildings/temporary leisure centre and the construction of a two-storey temporary school building, external landscaping and associated site infrastructure.

The following remedial measures were agreed so that the contamination identified on site no longer presents a risk:

- Production of Materials Management Plan (MMP) under the CL:AIRE Definition of Waste Protocol for the re-use of soil materials on site.
 - Removal of all hardstanding, floor slabs, relict foundations and in ground obstructions. Hard materials will be crushed for re-use. Samples of crush will be tested at a rate of 1 per 1000m³ (minimum of 3 samples per source) for a suite of analysis that includes metals, speciated PAHs and asbestos.
 - Excavation, screening and engineering / re-use of made ground and soils. Samples of made ground will be tested at a rate of 1 per 1000m³ (minimum of 3 samples per source) for a suite of analysis that includes metals, speciated PAHs, TPH CWG, BTEX and MTBE and asbestos. Visual inspections and VOC screening using a PID will be carried out at a rate of 1 test per 250m³.
 - Installation of a cover system of 450mm of 'clean' validated topsoil/subsoil within the limited areas of soft landscaping located towards the front of the site. Deeper tree pits will be used where required. The imported topsoil and subsoil, and any suitable site won soils, will be tested at a rate of 1 per 150m³ for brownfield and site won soils (minimum of 6 samples per source) and 1 per 250m³ for proven greenfield sources (minimum of 3 samples per source). Samples will be tested for a suite of analysis that includes metals, speciated PAHs, TPH CWG, BTEX and MTBE and asbestos. The results will be compared to GACs for residential without homegrown produce. The thickness of the clean cover system will be validated using trial holes and photographs.
 - A United Utilities water supply pipe risk assessment will be completed to determine if barrier pipe is required on site. Where barrier pipe is required, validation information will be required including photographic evidence and receipts/delivery notes for the barrier pipe.
 - A watching brief to identify and deal with any previously unidentified contamination will be maintained during demolition and clearance/soils strip works. Confirmation that no unforeseen contamination was encountered during the development will be required. This should include a photographic record of the development and should focus particularly on the excavations for the foundations in order to illustrate the ground conditions encountered.
- 1. Validation information to confirm that the asbestos containing materials identified have been removed, including waste transfer documentation**

The pre-demolition asbestos survey identified asbestos (chrysotile and amosite) containing materials comprising insulating board, floor tiles with adhesive, textured coatings, gaskets, a resin toilet cistern and bitumen. These materials were to be removed prior to demolition.

Validation information including waste disposal documentation is still required to demonstrate that the asbestos containing materials identified in the survey were removed prior to demolition of the former buildings.

2. A materials management plan, where the CL:aire Definition of Waste Code of Practice is to be used

A copy of the Materials Management Plan (Materials Management Plan, Brownfield Solutions Ltd, Reference: TM/C5394/13199, 17 June 2024) and Signed QP Declaration has been included in Appendix B of the Validation Report. The site has been subject to a reduced level dig with all site-won soil arisings from all excavations such as for foundations and service trenches to be disposed of off-site.

The MMP is for the re-use of site won crushed material to backfill service and drainage trenches and as engineered fill beneath of the temporary building. Site-won made ground will also be used beneath the temporary building footprint and hardstanding.

Clean naturally occurring materials, comprising subbase materials will be imported by direct transfer to raise the site levels to the agreed development platform.

A U1 Exemption for the site has also been registered to import small quantities of topsoil for the soft landscaped areas (Reference: WEX410260, 11 July 2024).

3. 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 following verification information has been received for the remediation carried out between May and August 2024:

- **Production of Materials Management Plan (MMP) under the CL:AIRE Definition of Waste Protocol for the re-use of soil materials on site.**

A copy of the MMP has been provided (see Section 2 above). A U1 Exemption has been registered to import small quantities of topsoil for the soft landscaped areas.

- **Removal of all hardstanding, floor slabs, relict foundations and in ground obstructions. Hard materials will be crushed for re-use and tested for suitability.**

A total of 3 no. samples of site-won crush were taken by BSL and tested at the agreed rate of 1 per 1000m³ (minimum of 3 samples per source) for a suite of analysis that includes metals, speciated PAHs and asbestos (SP01-SP03, i2 analytical report 24-022856, 11 June 2024). A previous sample was taken by PP O'Connor (DM1, Chemtech Report ref. 133312, 24 May 2024) and tested for a suite of analysis that included metals, speciated PAHs, BTEX, TPH CWG and asbestos. No elevated concentrations of contaminants were found when compared to the assessment criteria for commercial land-use. No asbestos was found. The material has been used as general fill beneath buildings and hardstanding.

- **Excavation, screening and engineering / re-use of made ground and soils.**

Based on the information provided, it is understood that excavated made ground and soils were removed from site rather than being re-used. Copies of waste transfer notes for the removal of 'spoil' from site by Chartrange either to 'tip' or to Chartrange's yard in Dukinfield. The notes are dated between 31 May 2024 and 24 July 2024.

MOT Type 1 limestone aggregate was imported by Chartrange from Tarmac's Tunstead Quarry at Buxton (the supplier certification has been provided), for use as general fill and subbase. No chemical testing is required for virgin quarried stone.

Delivery notes for MOT have also been provided in Appendix F. It is noted that multiple copies of the same delivery notes have been included and that MOT has also been imported from Cemex's Dave Holes Quarry via Travis Perkins.

Photographs of the MOT material stockpiled on site on 30 July 2024 have been provided.

- **Installation of a cover system of 450mm of 'clean' validated topsoil/subsoil within the limited areas of soft landscaping located towards the front of the site. Deeper tree pits will be used where required.**

The results of 'at-source' testing of 13 no. samples for metals, inorganic compounds, PAHs, TPH-CWG, BTEX, MTBE and asbestos have been provided for topsoil sourced from 'Eaton Hall'. (TS1-TS13, Element, Report: 23/16922 Batch 1, 12 October 2023). These samples were taken in October 2023, more than 8 months before the topsoil was imported to the school site at Spring Lane. Therefore, it is considered unlikely that it will be the same material. Although, the report states that BSL consider the topsoil to be from a brownfield source (therefore requiring a minimum of 6 no. samples), no details of where the source site is located have been provided.

The report also states that delivery notes for the topsoil are included in Appendix G but all the delivery notes are for MOT Type 1 and there are none for topsoil.

On-site in-situ testing of the topsoil is required to demonstrate that the actual topsoil brought to site is suitable for use. Delivery notes for the topsoil are also required.

Depth validation of the cover system was carried out BSL on 12 August 2024. A total of 4 no. hand dug pits were excavated (HP01-HP04). A depth of between 450mm and 500mm of topsoil was proven and was underlain by a white geotextile. Photographs of the trial holes have been provided.

- **A United Utilities water supply pipe risk assessment will be completed to determine of barrier pipe is required on site.**

No information regarding this action has been included in the verification report. A copy of the United Utilities water supply pipe risk assessment is required. Where barrier pipe is needed, validation information including photographic evidence and receipts/delivery notes for the barrier pipe is required.

- **A watching brief to identify and deal with any previously unidentified contamination will be maintained during demolition and clearance/soils strip works.**

No evidence of significant contamination was identified during the post-demolition investigation works. Slight hydrocarbon odours were noted in TP108 and TPSA301 in the initial investigation, but no evidence of gross hydrocarbon contamination was found.

It is understood that a suspected asbestos cement pipe was encountered by the demolition contractor and was subsequently removed prior to Brownfield Solutions commencing the post-demolition investigation works. A copy of the Hazardous Waste Consignment Note CARLTD/03477 for the removal of 780kg of asbestos waste generated during the removal of the asbestos pipe has been provided.

Further information is required to verify that the agreed remediation strategy has been successfully implemented.

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) Validation information to confirm that the asbestos containing materials identified have been removed, including waste transfer documentation.
- (ii) An updated verification report which includes the following validation information:
 - On-site in-situ testing of the topsoil placed in soft landscaped areas to demonstrate that the actual topsoil brought to site is suitable for use.
 - Delivery notes for the topsoil brought to site.
 - A copy of the United Utilities water supply pipe risk assessment. Where barrier pipe is needed, validation information including photographic evidence and receipts/delivery notes for the barrier pipe are required.



Condition 5 requires the submission and approval of items (i) and (ii) above.

Condition 4 has previously been recommended for discharge.

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

Rebecca Jones
Environmental Protection Officer

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