

Planning Consultation Response

Condition Discharge Application

Environment Section – Contaminated Land

Application Reference:	71273	Discharge Reference:	72092
Site:	Pilsworth Quarry, Pilsworth Road, Bury, BL9 8QZ		
Approved Development:	Erection and operation of Material Recycling Facility		
To:	Claire Booth	From:	Sally Shaw
Our Reference:	CL551.090725.1	Date:	09 July 2025

Recommendations
Condition Status Summary
Condition 4 (Gas Risk Assessment Scope of Works) - A satisfactory risk assessment has been presented, as such the condition is recommended for discharge. Condition 5 (Site Characterisation and Remediation Strategy) - Suitable site characterisation and proposals have been submitted. The condition is recommended for discharge. Condition 6 (Remediation Verification) - Information to be provided once remedial measures are in place and prior to first use.
Outstanding Information
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.

Desk Study Information	
Current use	On-site: Active landfill site Off-site: Landfill site, M66 and agricultural fields.

Previous contaminating land uses	On-site: Area previously used for storage associated with the landfill site. Off-site: Agricultural fields.
Environmental setting	Geology: Glaciofluvial Sand and Gravel overlying Lower Coal Measures Hydrogeology: Secondary A Hydrology: A number of ponds are situated to the east and south of the site. Mining: The Arley coal seam is conjectured to outcrop at the site, running northwest-southeast across the southwest corner of the site. Landfill/Waste: Located on an active landfill site Radon: Not affected by radon.
Approved Development	• As built plan • Building Floor plan

Assessment / Comments	
Information Reviewed	Previously considered: • Phase 1 Desk Study, Pilsworth Landfill, Wardell Armstrong, Reference: GM12887, dated June 2023. • Phase II Ground Investigation Report, Wardell Armstrong, reference GM13005/FINALV2, dated December 2024. Current submissions: • Capping Details and Areas of Potentially Contaminated Soils, Egniol Consulting Ltd, drawing number ECL.9595.D02.001, dated 10.03.2025. (Condition 5) • Ground Gas Risk Assessment Report, Egniol Consulting Ltd, reference ECL.9595.R06.001, dated May 2025. (Condition 4) • Technical Note No.1, Egniol Consulting Ltd, reference ECL.9595/TN/01, dated 10th June 2025. (Overview of conditions 4, 5 & 6)
LCRM Stage 1 - Site Characterisation and Risk Assessment	
Preliminary Risk Assessment	A desk study report was submitted for a previous application 69956 and found to be satisfactory (Reference CL551.120923.1)
Site Investigation and Generic Quantitative Risk Assessment	Site investigations were reported under the application 71273 and considered within our reference CL551.201224.1. Owing to the retrospective nature of the application and the recommendation in the Phase II report (Wardell Armstrong, December 2024) for gas protection measures when the building had

	already been constructed, a Gas Risk Assessment was requested. This has been undertaken (Egniol Consulting Ltd, May 2025). Within the report the consultant reviewed the previous assessments and undertook further risk assessment: • The consultant considers that the length of response zone for both the WA and the permit perimeter boreholes to be too long to reliably model the gas regime. Reference is made to BS8576 and the NHBC guidance (NF94). This is a good point as the perimeter boreholes are assessing a deeper migration risk, whilst for building risk, the assessment should be of potential shallow gas migration. • Made ground is not considered as a potential source. This stratum is only clearly logged on the trial pits, from the surface to a maximum depth of 1.3m bgl. The borehole logs are poorly constructed having been undertaken retrospectively at our request from the initial “drillers logs”; as such this stratum was not logged in detail. It is understood that approximately 1m of this material was removed/reprocessed prior to the build but is still present beneath and surrounding the building. Discussions with the Environment Agency also refer to the potential for waste material to be present in this area and photos from the public records have been provided to this Section showing this. • A Ternary Plot of gas data is presented which indicates a microbial not landfill gas source. Further to the Ground Gas Risk Assessment a qualitative commentary has been provided within the Technical Note with regards the building design and construction. This notes that the design enables the building to be <i>very permeable</i> whilst the oversite reinforced concrete ground slab and associated membrane ensures any ground gases <i>will likely dissipate laterally rather than penetrate through the membrane and RC slab as the lateral migration path will be the one of least resistance</i>.
Detailed Quantitative Risk Assessment	Not required.
LCRM Stage 2 - Options Appraisal	
Remediation Strategy & Verification Plan	The assessments undertaken at Stage 1 satisfactorily demonstrate that no remedial measures are required to the building. As contamination is still present in the reworked made ground surrounding the building a capping system is proposed. This is to comprise a high visibility geotextile overlying the made ground and a capping of 300mm of clean soils, aggregate or concrete to be placed

	extending a minimum of 2.5m away from the perimeter of the reinforced concrete raft. Verification of this will be undertaken once in place.
Materials Management	No information submitted.
LCRM Stage 3 - Remediation and Verification	
Verification	Not required at this stage.

Notes	
- Bury Council's Developers Guide for Contaminated Land provides an overview of the assessment of contaminated land in Planning and developing potentially contaminated land. - 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. - Developments that are brought into use prior to the requirements of pre-occupation conditions being satisfied, would be result in breach of condition and could result in the site being considered under Part 2A. - 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.	