

Planning Consultation Response

Condition Discharge Application

Environment Section – Contaminated Land

Application Reference:	69702	Discharge Reference:	72480
Site:	Halter Inn Works, 11 Redisher Croft, Ramsbottom, Bury, BL0 9SA		
Approved Development:	Demolition of existing industrial buildings and erection of 3 no. detached dwellings		
To:	Jennie Townsend	From:	Rebecca Jones
Our Reference:	CL621.091026.CL1	Date:	9 October 2026

Recommendations

Condition Status Summary

- **Condition 3 (Site Characterisation and Remediation Strategy)** – This Section is satisfied that the requirements of Condition 3 have been met. However, confirmation that the Environment Agency are satisfied with the controlled waters assessment is required before we can recommend discharge of Condition 3 (see item (i) below).
- **Condition 4 (Remediation Verification)** – A Verification Report will be required in due course.

During a site visit on 25 November, it was noted that foundation works to construct the properties have already commenced without the pre-commencement condition being recommended for discharge.

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:

- Confirmation that the Environment Agency are satisfied with the controlled waters assessment.
- A materials management plan, if the [CL:AIRE Definition of Waste Code of Practice](#) is to be used.
- 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: Construction site following the demolition of the former works. Off-site: Public house, garage and residential properties.
Previous potentially contaminating land uses	On-site: Buildings associated with a cotton mill, a public house and an industrial unit. Off-site: A cotton mill, infilled reservoir and filter beds, and a works.
Environmental setting	Geology: Brooksbottoms Grit overlain by glacial till (potentially absent). Hydrogeology: Secondary A Aquifer (Brooksbottoms Grit). Hydrology: Located adjacent to the Holcombe Brook. A culvert may exist beneath the site. Mining: Part of the site is located within a Development High Risk Area. Landfill/Waste: Not within 250m of a known landfill site but there has been filling activity in the surrounding area. Radon: The site is situated within a Category 2 Radon Affected Area.
Approved development	• Site Plan, Revision A, dated 16 October 2023.

Assessment / Comments	
Information Reviewed	• Environment Agency Letter Response regarding Additional Info for Planning Permission 69702, Unit 1-2, Halter Inn Works, 11 Redisher Croft, Ramsbottom, Bury, BL0 9SA, Reference: SO/2026/125571/03, 11 June 2026. • Controlled Waters Risk Assessment for Halter Inn Works, Holcombe, LK Consult, Reference: LKC261240-A3-CWRA-Halter Inn-R0, 22 September 2026. • Statement from Paul Brackenridge that remedial measures outlined by LK Consult and Demeter Environmental will be completed, dated October 2026. Previous received and reviewed: • Phase 1 Preliminary Risk Assessment, Halter Inn Works, Holcombe, LK Consult Ltd, Reference: 14 1496, 6 February 2015. • Geoenvironmental Investigation report and Remediation Strategy for Halter Inn Works, Holcombe, LK Consult, Reference: LKC 14 1496, 2 April 2015. • Phase II Site Investigation Report For 1-2 Halter Inn Works, 11 Redisher Croft, Ramsbottom, Bury, BL0 9SA, Demeter

	Environmental Ltd, Reference: 25-08-02 Rev 0 Final, September 2025. • Remediation And Enabling Works Strategy, Halter Inn, No Author, No Date. • Phase IIIA Implementation Plan fpr 1-2 Halter Inn Works, 11 Redisher Croft, Ramsbottom, Bury, BL0 9SA, Demeter Environmental Ltd, Reference: 26-01-01 Rev 0 Final, January 2026. • Environment Agency Letter Response regarding Planning Permission 69702 Unit, 1-2 Halter Inn Works, 11 Redisher Croft, Ramsbottom, Bury, BL0 9SA, Reference: SO/2026/125571/01-L01, 19 February 2026.
LCRM Stage 1 - Site Characterisation and Risk Assessment	
Preliminary Risk Assessment	A preliminary risk assessment report (LK Consult, Reference: 14 1496, February 2015) has previously been reviewed and commented upon in letters CL621.080715.1 (Application: 54975) and CL621.130723.1 (Application: 69702). The report submitted included a description of the site including its past historical uses. An appraisal of the site environmental setting was presented including its geology, hydrogeology and hydrological regime, mining activities, waste management issues, and identification of additional environmental sources, pathways and receptors. This information was used to compile a clear site conceptual model, which identifies potential sources, pathways and receptors and likely pollution linkages. A site reconnaissance was carried out on 12 January 2015 which found a metal finishing works building in the centre of the site, a concrete yard area used for car parking, a steel contained, a number of IBCs and a retaining wall to the west of the building. Manhole covers relating to a culverted watercourse are present. Potential pollutant linkages were identified and therefore, a site investigation was recommended to include soil sampling, gas monitoring and groundwater monitoring.
Site Investigation and Generic Quantitative Risk Assessment	A site investigation and risk assessment report (LK Consult, Reference: LKC 14 1496, April 2015) was submitted in support of a previous application at the site (54975). Elevated concentrations of arsenic and lead were identified in the soil. A new investigation was completed by Demeter Environmental on 12 August 2025 following demolition of the former works and comprised the following:

- 8 no. trial pits – excavated to between 1.5 and 2.6m bgl (TP101 to TP108).
- 12 no. soil samples – 9 no. made ground, and 3 no. natural samples were tested for a suite of analysis that include metals, speciated PAHs, BTEX, TPH CWG and asbestos.
- 4 no. soil leachability samples – Natural samples tested for metals, inorganics speciated PAHs, BTEX, TPH CWG

Site Ground Conditions and Risk Assessment: Ground conditions at the site comprise of concrete/hardstanding locally over granular and cohesive made ground to a maximum depth of 1.5m bgl containing brick and concrete. The natural strata comprises of clays, silts and sand and gravel strata. Shallow bedrock was encountered in TP104 and TP108 (sandstone) and TP103 and TP106 (coal).

The soil analysis results have been compared to the Defra C4SLs and CIEH/LQM S4ULs where available for residential with homegrown produce land use.

The following elevated concentrations of contaminants were found in the made ground:

- Lead – Samples TP104 0.3m (2350mg/kg), TP105 0.5m (423mg/kg), TP106 0.4m (1040mg/kg), TP107 0.5m (1490mg/kg) and TP108 0.5m (1640mg/kg) based on C4SL of 200mg/kg.
- Chromium – Sample TP108 0.5m (1320mg/kg) compared to S4UL of 910mg/kg.
- Benzo(a)pyrene – Samples TP102 0.4m (14.1mg/kg), TP107 0.5m (4.44mg/kg) compared to S4UL of 2.2mg/kg.
- Benzo(a)anthracene – Sample TP102 0.4m (15mg/kg) compared to S4UL of 7.2mg/kg.
- Benzo(b)fluoranthene - Samples TP102 0.4m (14.7mg/kg), TP107 0.5m (4.86mg/kg) compared to S4UL of 2.6mg/kg.
- Dibenzo(ah)anthracene - Samples TP102 0.4m (1.79mg/kg), TP107 0.5m (0.588mg/kg), TP108 0.5m (0.285mg/kg) compared to S4UL of 0.24mg/kg.
- TPH C16-C21 Aromatic – Samples TP102 0.4m (816mg/kg), TP107 0.5m (281mg/kg) compared to S4UL of 260mg/kg/
- TPH C21-C35 Aromatic - Sample TP102 0.4m (1670mg/kg) compared to S4UL of 1100mg/kg.

Additionally, elevated concentrations of PAHs were found in the natural strata in TP102 at 1.4m:

- Benzo(a)pyrene (6.38mg/kg)
- Benzo(a)anthracene (7.54mg/kg)
- Benzo(b)fluoranthene (6.65mg/kg)

- Dibenzo(ah)anthracene (0.782mg/kg)

No asbestos was encountered.

The consultant has concluded that there is a potential risk to human health and consequently remedial action is required.

This assessment appears reasonable.

Site Water Conditions and Controlled Waters Assessment:

During the 2025 Demeter Environmental investigation, seepages were noted in TP101, TP102 and TP104 associated with natural clay and sand and gravel deposits and the sandstone bedrock.

Following consultation with the Environment Agency ([EA Response: SO/2026/125571/01-L01](#) and EA Response: SO/2026/125571/03) further investigation into the risk to controlled waters was carried out in August 2026 by LK Consult:

- 2 no. groundwater samples - WS101 and WS102.
- 1 no. leachate sample – WS103 0.05-0.50m (made ground - no groundwater was present).
- 2 no. surface water samples – SW1 and SW2.

The samples were tested for a suite of analysis that included metals, TPH CWG, BTEX, MTBE, speciated PAH. Elevated concentrations of pyrene and zinc were recorded in the groundwater sample. Chromium, zinc and PAH were identified in the leachate sample. No elevated concentrations were identified in the surface water samples.

LK Consult considered that the risks to controlled waters are low and that no additional remediation is required due to the following:

- The likely source of metals and PAH contamination is ash, clinker, coal and tarmac fragments within the made ground. These contaminants are unlikely to be mobile, and the consultant considers that the levels found are typical of a brownfield site.
- The on-site culvert has been routed and is likely to flow within an impermeable pipeline.
- There is no evidence that Holcombe Brook has been impacted.
- There are no groundwater abstractions within influencing distance of the site.

The Environment Agency (EA) is the regulator of controlled waters and has previously commented upon this application. Confirmation is required that the EA are satisfied with the conclusions of the risk

	assessment that no specific remedial action is needed. Site Ground Gas Conditions and Risk Assessment: Deposits of coal were encountered at shallow depth which could be a source of gas. Additionally, an infilled reservoir and evidence of waste disposal is present in the area. Gas monitoring was undertaken as part of the Lk Consult 2015 site investigation. Low concentrations of methane (maximum 0.1%v/v) and carbon dioxide (maximum 3.5%v/v) were recorded along with negligible flow rates. No protection measures were recommended. No gas monitoring was carried out as part of the 2025 Demeter Environmental site investigation. The Demeter site investigation report recommended that precautionary gas protection measures be installed in the three properties. However, the subsequent Demeter Implementation Report (January 2026) concluded that gas protection measures are not required based on 2015 LK gas monitoring. This data is now over a decade old and further assessment was recommended but not received. It is now understood that a radon gas resistant membrane has been installed in the foundations (photographs provided). However, the site is located in a Class 2 Radon Affected Area, where protection measures are not required. Given the presence of a radon resistant membrane and the low concentrations of gas previously identified, on this occasion this Section is satisfied that the risk to human health from gas ingress is low.
Detailed Quantitative Risk Assessment	No information submitted.
LCRM Stage 2 - Options Appraisal	
Remediation Strategy & Verification Plan	The following remedial actions have been recommended in the LK Consult (2015), Demeter Implementation Plan (January 2026) and Remediation Statement (October 2026): • Excavation of hard surfaces and below ground obstructions. • Crushing of all suitable artificial hard material (i.e. concrete/brick etc.) for reuse on the site or removal from site • Re-profiling of ground levels to achieve the desired development levels. • Placement of a sufficient cover on garden and landscaped areas: ○ Garden areas (Plots 1-3) – 600mm (150mm topsoil,

	450mm subsoil) with a geotextile marker layer (Lotrack 300). ○ Landscaping areas (Visitors Parking Area and Along Plot 3) – 300mm (150mm topsoil and 150mm subsoil) with a geotextile marker layer (Lotrack 300). Topsoil and subsoil will be supplied by SED Services Ltd, Landgate Farm, Bryn, Wigan and at source testing has been provided. On-site testing of the imported soils will be carried out once the soils have been placed. A minimum of 3 samples per source will be tested for a suite of analysis that includes metals, speciated PAHs and asbestos and compared to S4UL for residential with homegrown produce. Depth validation will be completed using hand dug trial holes. • Potable water supply protection measures to comprise barrier pipe. • Radon Protection Measures to comprise radon resistant membrane (site is located in a Class 2 Radon Affected Area so protection measures would not normally be required). • Watching brief to identify and deal with any previously unforeseen contamination. • Deposal of excess soil at a suitably licenced waste disposal facility.
Materials Management	No information submitted. If the CL:AIRE Definition of Waste: Code of Practice is to be used, a copy of the Materials Management Plan will be required.
LCRM Stage 3 - Remediation and Verification	
Verification	No information submitted.

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.