



**DEPARTMENT OF
OPERATIONS**

Helen Pressley
Bury Council Development Control

Date 5 December 2023
Reference C059.051223.1

Dear Helen

Top Park Playing Fields, Bolton Road West, Ramsbottom, Bury, BL0 9NU, Planning Application: 70200 – Contaminated Land

I write regarding the above planning application. The Environment Section has received a copy of the following report:

- Ground Investigation Report, Proposed LED Foodlit Football Turf Pitch (FTP), Top Park, Bury, Soiltechnics, Reference: STV6169-R01 Rev A, October 2023.

The Environment Section has reviewed the above information in order to assess the following points:

1. The adequacy of the desk study information available for this site.
2. The adequacy of the site investigation.
3. The adequacy of the final risk assessment.
4. The acceptability of the proposed remediation strategy.
5. Whether the information submitted is sufficient to determine that the site presents a low risk to human health and the environment.

The site is currently occupied by playing fields, a car park and a small pavilion/changing rooms. Current uses in the surrounding area include residential properties and public open space. Previous land uses at the site have included open land and fields, a Refuse Tip (1963), which is marked as disused by 1978, and a park by 1989. Previous uses in the surrounding area have included Hope Mills (Cotton) with reservoir, Hazelhurst Mill (Towel), an Iron Works, Hope Works (Bleaching, Dyeing and Finishing) and areas of waste disposal activity.

The site lies within the boundary of a registered landfill site known as Bolton Road West Landfill, which is a former Victorian tip. The site was later infilled up to 1975 with household and industrial waste, ash and Victorian refuse. The site is owned by Bury MBC Leisure Services who remediated the site in 1993/94. A passive venting trench with venting columns and cowls was installed along the east, south and southwestern perimeter of the site with a bentonite cut off wall along the Bolton Road West boundary.



Additionally, two further registered landfill sites are located within 250m of the site. The site is not in close proximity to any major surface watercourse. The site is situated above the Brooksbottoms Grit Secondary A Aquifer, overlain by glacial till and deposits of made ground/waste material. The Brooksbottoms Coal Seam is thought to be present beneath the site. The site is not situated within a Radon Affected Area.

It is understood that the proposed development comprises the creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, new macadam hardstanding areas, floodlights, storage container; a car park with associated lighting and landscaping; floodlights; and a single storey extension to an existing pavilion/changing rooms.

1. The adequacy of the desk study information available for this site

The report includes a description of the site including its past historical uses. An appraisal of the site environmental setting is presented including its geology, hydrogeology and hydrological regime, mining activities, waste management issues, and identification of additional environmental sources, pathways and receptors. However, this information has not been used to compile a clear site conceptual model, which identifies potential sources, pathways and receptors and likely pollution linkages.

A site reconnaissance visit was carried out as part of the preliminary risk assessment. The site was found to comprise grassed playing fields and sports pitches used by the Ramsbottom United Junior Football Club, a car park and a small pavilion/changing rooms.

The report concluded that there was a potential risk to future site users and the environment from potential contamination at the site. Consequently, a site investigation has been undertaken.

A site conceptual model is required, which clearly identifies potential sources, pathways and receptors and likely pollution linkages. This should include the findings of any intrusive investigations.

2. The adequacy of the site investigation

A site investigation (primarily for geotechnical purposes) was undertaken on 18 and 19 September 2023 and comprised the following:

Technique	No.	Comments
Hand dug trial holes	6	Excavated to depths of between 0.6 and 1.2m bgl and are located within: - Proposed car park - HP01-HP04 - Proposed artificial pitch - HP05 and HP06 HP01 and HP03 terminated early due to cobble obstructions and HP06 due to the presence of a land drain.
Window samples	6	Excavated to depths of between 2.9 and 5.45m bgl and are located within:

		- Proposed car park – WLS05-WLS06 - Proposed artificial pitch - WLS01-WLS04 WLS01 to WLS04 terminated early due to obstructions or competency of the deposits.
Soil sampling	1	1 no. composite sample of topsoil-like made ground was tested for a suite of analysis that included metals, speciated PAHs, banded TPH and asbestos.
WAC Testing	1	1 no. composite sample of made ground was tested for a Waste Acceptance Criteria (WAC testing) suite of analysis that included metals, speciated PAHs and banded TPH.

Site Ground Conditions: Two distinct areas of the site were investigated and found to have different ground conditions:

- **Proposed car park area** (HP01-HP04 and WLS05-WLS06) - Topsoil-like made ground to between 0.17 and 0.35m, over cohesive made ground containing brick, sandstone, plastic, concrete, glass and ceramics, wood fragments to in excess of 1.2m bgl, over cohesive made ground thought to be reworked glacial till. The underlying natural strata was found to comprise of clay and sand deposits (glacial till). Bed rock was not encountered.
- **Proposed artificial pitch** (HP05 and HP06, WLS01-WLS04) – Topsoil-like made ground to between 0.1 and 0.25m, over cohesive and granular made ground deposits to in excess of 3.91m containing glass, brick, plastic, ceramic, concrete, ash, clinker and wood fragments, assumed to represent landfill waste. Hydrocarbon odours were noted with the made ground in WLS01, WLS02 and WLS04. Bed rock was not encountered.

Site Water Conditions: Perched groundwater (seepage) was encountered within the cohesive made ground in HP02 at 0.65m and within the deeper granular made ground in WLS05 at 4.0m bgl.

Site Ground Gas Conditions: No gas monitoring has been completed and no monitoring wells were installed within WLS01-WLS06.

3. The adequacy of the final risk assessment

Ground Assessment: A single composite sample of topsoil-like made ground was tested to assess the risks to human health and the results compared to Defra C4SLs and CIEH/LQM S4ULs for residential with homegrown produce land use. No elevated concentrations were found and no asbestos encountered. Consequently, the consultant considers that the topsoil-like made ground does not pose a risk to human health and that this soil is suitable for re-use on-site.

The use of composite samples is not considered suitable when assessing the risks to human health from made ground due to the heterogeneity of the material. A single sample does not give any statistical confidence of the result. Further soil sampling is required to determine the risk to human health from the soils at the site.



Where site won soils are re-used on site, this must be done under the appropriate waste exemption or, where materials are suitable for re-use without treatment, the Definition of Waste Code of Practice (DoWCoP) could be used and a Material Management Plan produced.

A single composite sample of made ground was tested for waste disposal classification. The use of WAC testing is not suitable for assessing the risks to human health.

Controlled Waters Assessment: No assessment of the risks to controlled waters has been presented. This should be included in the revised site investigation and risk assessment report.

Ground Gas Assessment: No assessment of the potential risks from landfill/ground gas to the proposed extension to the existing pavilion has been undertaken.

The consultant has recommended that *'As part of the [further] investigation, a gas/vapour risk assessment should be undertaken, in order to determine the gas risk to end users of the site from the deep Made Ground within close proximity to the proposed pavilion extension'*. Please submit a proposal for landfill/ground gas investigation.

Please note that when the new changing rooms/pavilion were built in 2012 (Application: 54705), gas protection measures were to be installed. However, no validation evidence was submitted to demonstrate that the agreed measures were installed.

4. The acceptability of the proposed remediation strategy

Following the completion of the further investigation, depending on the findings, a remediation strategy will be required.

5. Whether the information submitted is sufficient to determine that the site presents a low risk to human health and the environment

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) A site investigation proposal to include further soil testing for human health risk and a gas/vapour assessment.
- (ii) A site investigation and risk assessment report, which includes a clear site conceptual model.
- (iii) A detailed remediation strategy, validation plan and materials management plan.
- (iv) 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 above information will be required by planning conditions, if permission is granted.



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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