

From: Jones, Rebecca (Environmental Protection) <bury.gov.uk> **On Behalf Of** envsection
Sent: 15 October 2024 16:03
To: Booth, Claire <bury.gov.uk>
Subject: FW: Consultation on Condition Discharge 69884 - Land Adjacent to 1 Park Avenue, Ramsbottom, BL0 0DA

Claire,

I write regarding Condition 5 and 6 of the above development. The following documents have been submitted:

- Enviro+Geo Insight, 1 Park Avenue, Ramsbottom, BL0 0DA, Groundsure, Reference: GS-8648646, 5 April 2022.
- Summary Findings of Ground Contamination Tests at Land Adjacent 1 Park Avenue, Ramsbottom, HDB Projects Ltd, No Reference, 23 August 2024.

The site is currently occupied by a building site with the proposed dwelling mostly complete. Our research indicates that current uses in the surrounding area include residential, open land and the M66 motorway. Previous uses at the site have included open land, and part of a semi-detached dwelling and garden which was built by 1937 and later extended. Previous land uses in the surrounding area have included a quarry and areas of potential waste disposal/infilling. The site is located within 250m of two landfill sites but is not in close proximity to any major surface watercourse. The site is situated on Glacial Till Deposits over the Millstone Grit Formation Secondary A Aquifer. It is considered possible that deposits of made ground exist at the site. The site is not within a Radon Affected Area.

This section has observed that the development has started and was almost complete (in August 2024), without the pre-commencement conditions being discharged. It is noted that the application for discharge of condition dated 09/09/2024 stated that the development has not commenced.

A Groundsure search report has been provided. This only provides the raw data on which a desk study and preliminary risk assessment is based and includes no interpretation, risk assessment and conceptual site model on which to test against.

The 'Summary Findings of Ground Contamination Tests' report does not include an assessment of the desk study information or conceptual site model and only includes a statement that '*The client has undertaken an EnviroSearch survey of the property which had identified that the property is at no significant risk of contaminated land at or within the vicinity of the property.*' A preliminary risk assessment should include the following:

- The purpose and aims of the study.
- A site walkover and reconnaissance visit to identify any visual potential sources of contamination including the presence of made ground or asbestos containing materials.
- A preliminary (qualitative) assessment of risks based on proposed site use including an appraisal of actual and/or potential contaminant sources, pathways and receptors, along with the production of a conceptual model (visual and/or written).
- Recommendations for intrusive contamination investigation and/or ground gas monitoring, if necessary.

Guidance on how to carry out a contaminated land risk assessment can be found here:

[Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-risk-management-lcrm)

Based on the Summary Findings of Ground Contamination Tests report it is understood that 2 trial holes were excavated to 1.0m by Mini Soil Surveys and the ground conditions were found to comprise topsoil (100mm) over sandy clay. However, the Mini Soil Surveys logs/factual report on the investigation have not been provided. Based on the certificate of analysis 2 no. samples of natural sandy clay were tested for a suite of analysis that included metals and speciated PAHs.

The report includes a number of errors including missing words and incomplete sentences and sections. Additionally, on the site plan both trial holes are marked as 'TP1'. The risk assessment and remedial strategy sections are incomplete and the risk assessment has the heading 'Commercial Development' when the development is for residential.

A new report is required which includes a Preliminary Risk Assessment, Quantitative Risk Assessment of the findings of the investigation and a Remediation Strategy. A Completion Report to demonstrate that the proposed remedial measures have been undertaken is also required. These assessment reports should be completed by a [competent person](#).

Consequently, this Section cannot recommend discharge of Conditions 5 and 6. It is recommended that no further development is undertaken until this breach of planning conditions is resolved.

Regards,

Rebecca.

Rebecca Jones

Bury Council

3 Knowsley Place

Duke Street

Bury

BL0 0EJ