



**DEPARTMENT OF
OPERATIONS**

Helen Pressley
Bury Council Planning Department

Date 17th October 2024
Reference CL1043.171024.1

Dear Helen,

Willow Street, Bury, BL9 7QZ, Planning Application: 69602 – Contaminated Land

I write regarding the discharge of condition 5 of the above planning application. The Environment Section has received a copy of the following report(s):

- Phase II Geoenvironmental Site Assessment, e3P, 17-285-R1, April 2024

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

1. [The adequacy of the site investigation.](#)
2. [The adequacy of the final risk assessment.](#)
3. [Whether the information submitted is sufficient to determine that the site presents a low risk to human health and the environment.](#)

Condition Status Summary

- **Condition 5** – A desk study was submitted with the application and was found to be [sufficient](#). A site investigation and risk assessment has been undertaken, but is incomplete. See point [3](#) for our recommendations.
- **Condition 6** – Cannot be considered until all aspects of condition 5 have been satisfactorily addressed.

It is understood that the approved development comprises the demolition of 4 no. buildings and erection of a two storey apartment for supported living comprising 13 no. self-contained dwellings, a communal lounge and laundry room & 2 no. manager offices with associated parking and landscaping.

1. The adequacy of the site investigation

A pre-demolition site investigation was undertaken in February 2024 and comprised the following:

Technique	No.	Comments
Window sample probehole	6	Excavated to depths of between 3.33 and 5.45 m bgl.
Soil sampling		Samples analysed for a suite of analysis that included metals, pH, sulphide, cyanide, phenols, PAHs, SVOCs, VOCs, TPHs, asbestos identification and total organic carbon.
Ground gas monitoring	6	Monitoring wells installed in 6 boreholes with 3 of the proposed 6 visits reported on.

Site Ground Conditions:

Ground conditions at the site were described as made ground to a maximum of 4m bgl containing ash, brick, clinker, slag, brick, concrete and wood. The natural strata comprise drift deposits to 5.45mbgl. Bedrock was encountered in two locations at 2.7 and 4.5m bgl comprising mudstone.

Site Water Conditions:

Groundwater was struck in one location, WS101 at 3m bgl within clay.

Site Ground Gas Conditions:

A total of 3 visits have been carried out over a period of 3 weeks with atmospheric pressure less than 1000mb on all occasions. Three visits are outstanding.

Methane to a maximum of 0.1%v/v, carbon dioxide to a maximum of 5.4%v/v was reported. WS106 was flooded on all occasions and WS105 on two occasions.

2. The adequacy of the final risk assessment

Ground Assessment:

The soil analysis results have been compared to the CIEH/LQM S4ULs or residential end use. Elevated concentrations of arsenic (WS102 at 0.5m bgl) and PAHs including naphthalene (WS101 at 1.8m bgl) were recording in made ground. SVOCs were also identified above LOD in WS101 at 0.8m bgl).

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



Ground Gas Assessment:

The consultant has used the methodology set out in CIRIA 665 and BS8485:2015 to assess the gas regime at the site. Using this approach the majority of the site was classified as CS1, requiring no gas protection measures. However, one location, WS101, was classified as CS2 and requiring measures. It is noted that this is a preliminary assessment as the ground gas monitoring was not completed at the time of the report.

The report stated in sections 4.5.10 and 4.7 that the site is in an area affected by radon (class 3) and as such protective measures would be required. The [Preliminary Risk Assessment](#) report stated that the site was not in a radon affected area (class 1); this concurs with GIS mapping (December 2022) held by the Council from the BGS. It is recommended that clarification from the BGS is sought on this aspect. It is noted that section 4.5.2 of the report states: *The BGS reports that full radon protective measures are not necessary in the construction of new dwellings or extensions.*

Given that the site investigation was undertaken prior to demolition and site clearance, and there are recommendations for further post demolition investigations and gas monitoring is incomplete it is too early to consider whether the risk assessment is sufficient,

3. 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) Clarification on the radon status of the site.
- (ii) A post demolition site investigation and risk assessment report to include the final gas monitoring results.
- (iii) A detailed remediation strategy and validation plan should (ii) conclude that remedial measures are required.
- (iv) A materials management plan, if the [CL:AIRE Definition of Waste Code of Practice](#) is to be used.
- (v) If remediation is undertaken, 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.

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

Sally Shaw
Environmental Protection Officer

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