

KB/C5394/14482

23rd July 2025

Morgan Sindall
6th Floor,
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Salford Quays,
M50 3YW

For the Attention of Jon Gaskell,

Dear Jon,

Re: Remediation Strategy Closure Statement - Star Academy, Radcliffe, Manchester (TEMPs 2)

Background

The proposed development involves the construction of second 'Temporary Accommodation' school building (TEMPs 2), which will be located in place of the now demolished school building previously occupying the site. This is in addition to the first 'Temporary Accommodation' building (TEMPs 1), which is present to the south of the new development in TEMPs 2. It is understood to serve the same purpose but will provide facilities for the next years cohort of year 7 students while the main school building is being developed, which is being completed under a separate planning application

We write this letter to close out the requirements stipulated within the BSL Addendum Geo-Environmental Report and Outline Remedial Strategy (Report ref: PH/C5394/13776, dated December 2024) produced for TEMPs 2 located at Star Academy to discharge condition 4 of the planning proposal (Bury Council Planning Application Number: 71529) which states:

"The development hereby permitted within any approved phase shall not be occupied/brought into use until the works relating to land contamination detailed below are fully completed:

Where remediation is required, it shall be carried out in full accordance with the approved Remediation Strategy.

A Verification Report must be submitted to the Local Planning Authority for approval upon completion of remediation works. The Verification Report must include information validating all remediation works carried out; details of imported materials (source/quantity/suitability); details of exported materials; and details of any unexpected contamination.

Reason. To prevent unacceptable risk to Human Health and Controlled Waters and to prevent pollution of the environment in accordance with the aims and Paragraphs 187(f), 196 and 197 of the National Planning Policy Framework (December 2024)."

Ground Conditions

A brief summary of the ground conditions encountered within the area of temporary 2 accommodation building footprint (TP304, TP316, TP317 and TP318) are presented in the table below:

Stratum	Range Depths - Top (m bgl)	Range Depths - Base (m bgl)	Range Thickness' (m)	Brief Description
Made Ground	0.00	2.10-2.40	2.10-2.40	Gravelly SAND.
Natural Superficial Strata	2.10-2.40	3.20-3.40	0.80-1.30	Sandy gravelly CLAY & SAND.

As part of the further assessment for potential contamination of the site, selected samples were taken for the purpose of chemical contamination testing within the temporary accommodation site, samples were tested for a broad suite of contaminants such as heavy metals, PAHs, TPH and asbestos.

Heavy metal contamination (arsenic and lead) was encountered above residential without homegrown produce screening levels within four soil samples within close proximity to the temporary accommodation site.

PAH contamination above residential without homegrown produce screening values is also present within three soil samples within the surrounding area of the temporary accommodation site. In addition, several additional exploratory hole locations on the wider site have been found to contain elevated concentrations of PAHs, which are likely attributable to ash and clinker within the granular made ground, which was encountered throughout the temporary accommodation site.

During demolition a suspected piece of asbestos cement was encountered by the demolition contractor and was subsequently removed prior to BSL's commencing of the post demolition site investigation. During BSL's site investigation asbestos has also been detected at trace (<0.001% w/w) within one sample of made ground, taken from the location of a former potential asbestos cement.

Remediation Requirements

Contaminated Land is defined within the legislative framework as land which is in such a condition by reason of substances in, on or under the land that:

- 1) Significant harm is being caused or there is a significant possibility of harm being caused.
- 2) Significant pollution of controlled waters is being or is likely to be caused.

The potential for harm is based on the presence of three factors:

Source – Substances that are potential contaminants or pollutants that may cause harm

Pathway – A potential route by which contaminants can move from the source to the receptor, and the impact of that migration on the source e.g. attenuation.

Receptor – A receptor that may be harmed, for example the end-users of the site, considering the sensitivity of the receptor.

Where a source, pathway and receptor are all present a pollutant linkage exists and there is potential for harm to be caused.

Given the presence of multiple contaminants within the made ground underlying the temporary 2 area this material was identified as a source within the outline remedial strategy produced at the time, which recommended the installation of a clean cover system comprising 450mm of clean validated topsoil/subsoil over a warning geotextile or hard dig layer, on the assumption that this would break the pathway to the receptor, i.e. the site end-users. However the report specifically states that:

“A Cover System is only required in areas of new soft landscaping which are not currently expected to be required.”

Based on the current development plans there are no soft landscaping areas within the temporary 2 development and as such there is no remedial requirement to install a clean cover system. The final development plan for which is attached to this report (drawing reference: FS1013-ALA-EX-ZZ-D-L-0120).

In addition to this, BSL attended site on the 23rd July 2025 to inspect the TEMPs 2 development and ensure no new soft landscaping features are present. The site visit record and photographic record are attached to this report.

Therefore, the entirety of the TEMPs 2 development will either comprises hardstanding or the building footprint. The laying tarmac over the current capping layer in ongoing, upon completion this will be congruent with the attached development plan

Conclusion

The presence of hardstanding present across the entirety of the TEMPs 2 development will break the pathway to end-user therefore, there is no direct contact from the contaminated made ground and site end users, thus, the source cannot be considered to pose a risk to site end-users as there is no viable linkage. Equally, due to the lack of soft landscaping in this area of the development, there is no clean cover system to validate. Therefore, from the evidence provided the TEMPs 2 development have meet requirements stipulated in the remediation strategy.

We trust the above meets your requirements for condition 4. If you have any queries, then please do not hesitate to contact the undersigned.

Yours sincerely

For Brownfield Solutions Ltd