

Planning Consultation Response

Condition Discharge Application

Environment Section – Contaminated Land

Application Reference:	71426	Discharge Reference:	73195
Site:	Land adj Bealey Industrial Estate, Dumers Lane, Radcliffe, Manchester, M26 2BD		
Approved Development:	Demolition of buildings and erection of 77 no. affordable dwellings and associated access off Wild Street, landscaping and parking.		
To:	Helen Pressley	From:	Sally Shaw
Our Reference:	CL1099.030826.1	Date:	03 August 2026

Recommendations
Condition Status Summary
• Condition 17 (Pre-commencement: Site Characterisation) – recommended for discharge. See LCRM 1 for details. • Condition 18 (Pre-commencement: Remediation Strategy) – recommended for discharge. See LCRM 2 for details. • Condition 19 (Prior to first use: Remediation Verification) – to be submitted prior to occupation. • Condition 20 (Unexpected Contamination) – remains in place throughout the build. It is noted that the Environment Agency has recommended that conditions 17 and 18 be discharged in their consultation response.
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: (i) A materials management plan in accordance with CL:AIRE Definition of Waste Code of Practice. (ii) 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: Former industrial estate. Off-site: Residential and the adjacent Bealey Industrial Estate.
Previous potentially contaminating land uses	On-site: Paper works with associated reservoirs/settling tanks which were subject to infill and land raising. Off-site: Bleach and chemical works.
Environmental setting	Geology: Sandstone and middle coal measures overlain by alluvium. Hydrogeology: Secondary Aquifer. Hydrology: Site located between the River Irwell to the east and Hutchinson's Goit to the west. Mining: Not affected by mining. Landfill/Waste: Onsite landfill, C011; planning permission for infilling of onsite reservoir and settling tanks (1982). Radon: Not affected by radon.
Approved development	Approved layout.

Assessment / Comments	
Information Reviewed	- Supplemental Ground Investigation and Remediation Strategy, for Land Adjacent to Bealey Industrial Estate, Radcliffe, Coopers (Chester) Ltd, Reference: 8353WCH260430L, dated 30 April 2026. Previously considered: - Site Investigation Report for Land Adjacent to Bealey Industrial Estate, Radcliffe, Coopers (Chester) Ltd, Reference: 8353si, dated 08 November 2024.
LCRM Stage 1 - Site Characterisation and Risk Assessment	
Preliminary Risk Assessment	A Preliminary Risk Assessment was submitted in support of the application and considered under our reference CL1099.200125.1. Recommendations were made by ourselves and the Environment Agency that the assessment be extended to consider Per- and Polyfluoroalkyl substances (PFAS) as a potential source from the historical paper industry use. This has been undertaken in the submitted report and a thorough assessment of available information with regards the use of PFAS in the paper industry and the potential for it to be present onsite was presented.

	In additional we provided archive planning information to the consultant with regards the infilling of the onsite reservoir and settling tanks to inform the understanding of the landfill ahead of further site investigation works. The key aspect of this information was that the materials tipped were restricted to <i>builders' waste arising within the site and no importation of material</i>. An Officers report from the time noted that <i>there will be no importation of materials because the fill will come from the 1907 Brick Chimney when demolished</i>.
Site Investigation and Generic Quantitative Risk Assessment	An initial site investigation, prior to demolition, was undertaken in March and September 2024 comprising 9 trial pits (TP01 to TP09), 13 small diameter boreholes (WS01 to WS09 and WS101 to WS104) with subsequent soil testing and gas monitoring. Elevated concentrations of arsenic, beryllium, copper, lead, nickel, zinc, Benzo(a)pyrene, Dibenzo(a,h)anthracene, Aromatic >C12-C16, Aromatic >C16-C21 and Aromatic >C21-C35 were reported. The elevated PAHs and TPHs were limited to the infilled reservoirs/landfills. Ground gas monitoring had been undertaken on two occasions at the time of the previous report, and an initial CS2 classification was assumed for plots within the area of the former landfill/reservoirs. A supplemental site investigation was undertaken in January and February 2026 to build on the initial assessment, to carry out an assessment for PFAS and to include areas not previously accessible. It comprised the following: • 5 no. trial pits (TP101 to TP104) – excavated to a maximum of 2.80m bgl. • 13 no. small diameter boreholes (WS201 to WS212, incl. WS205a) – sunk to a maximum of 5.45m bgl. • 3 No. Cable Percussive Boreholes (BH01 to BH03) sunk to a maximum of 10.45m bgl. • 30 no. samples – tested for a suite of analysis that included standard metals, PAH-16, asbestos, sulphates, speciated aliphatic and aromatic hydrocarbons (TPH-CWG), volatile and semi-volatile organic carbons (VOC/SVOC), and per and poly fluorinated alkali substances (PFAS). • Bulk gas analysis was undertaken to verify gas monitoring results. It is noted that no investigations were possible below the existing electrical substation. It was also not possible to investigate the area of the historic well due to the presence of services. Recommendations were made to investigate following site clearance and disconnection/diversion of services.

Satisfactory comments were provided regarding the deviations in temperature noted by the laboratory for the PFAS analysis.

The consultant confirmed by email that the noise bund (mound) was investigated via TP09. Testing of material from this trial pit identified asbestos fibres, no elevated metals, PAH compounds or TPHs. For the development a 3m high acoustic buffer will be re-formed in the existing area, of approximately 600m³ of material; reduced from approximately 1,200m³ in the existing mound. This will be tested to be suitable for use and uncontaminated.

Site Ground Conditions and Risk Assessment: Ground conditions at the site comprise of granular made ground to a maximum of 2.8m bgl containing inclusions of ash, clinker, burnt shale, fragmented concrete, brick and ceramics. In places inclusions of metal, rubber, glass, tarmac, coal, timber, plaster board, carpet and plastic were noted. The natural strata comprises variable alluvium with localised areas of soft silt and peat.

Within the infilled reservoir and settling tank the material was described as *an upper material of gravel with moderate cobble content sizes, comprising of a high proportion of materials of demolition provenance (e.g. brick and concrete). In places visible fragments of cement asbestos sheeting was present in the upper materials. The deeper material was reworked clays with gravels of metal, brick and plastic.*

The soil analysis results have been compared to the Defra C4SLs, CIEH/LQM S4ULs and GACs for residential with homegrown produce land use. Elevated concentrations were additionally noted for arsenic, beryllium, copper, lead, zinc and the presence of asbestos was confirmed.

PFAS was identified above the limit of detection (LOD) in 6 out of 7 samples. It is noted that this included the PFAS precursor N-EtFOSAA. Each of the identified PFAS compounds was considered in turn in relation to risk and source. PFHxS, PFOS and PFOA, for which there is a C4SL, were identified above the LOD. The guidance notes that the laboratory analysis should not be directly compared to the GAC but the hazard index (HI) approach should be followed, and a hazard quotient (HQ) should be calculated for each of the four C4SLs. These are then added together to calculate the HI. Should a HI greater than 1 be calculated then further assessment should be carried out. This was not provided, but we have assessed and found it not to exceed. It is recommended that for further assessments the HI approach should be followed and presented.

	Site Water Conditions and Controlled Waters Assessment: Chemical testing has identified the majority of the samples to contain detectable concentrations of PFOS, with identified levels above detection limit for other types of PFAS. The consultant concluded that <i>results fall within Tier 1 or Tier 2 DWI thresholds, and significantly lower than EQS-MAC.</i> Site Ground Gas Conditions and Risk Assessment: Completed gas monitoring for the two phases of assessment was provided. A maximum 8.3% carbon dioxide and 1.9% methane were reported. The consultant has used the methodology set out in CIRIA 665 and BS8485:2015 +A1:2019 to assess the gas regime at the site, alongside a qualitative discussion. Whilst the majority of the site was classified as CS1, as methane was identified above 1% v/v a precautionary CS2 was recommended for all plots over the former landfill area. Gas mitigation details are provided within the appendices of the report. The assessments carried out appear reasonable.
Detailed Quantitative Risk Assessment	Not relevant for this site.
LCRM Stage 2 - Options Appraisal	
Remediation Strategy & Verification Plan	The following remedial actions have been put forward: Earthworks Phase: • Testing of soils following decommissioning of substation (Plots 70-77). • Management/Removal of ACMs (Plots 60-77). Build Phase: • Inert cover system in gardens (All plots) • Chemical testing of any imported soils (if required) • CS2 gas mitigation measures (Plots 52-77). A 600mm cover system overlying a geotextile with a minimum of 150mm topsoil is noted. Soils must meet the requirements of the British Standard for topsoil (BS 3882:2015) and subsoil (BS 8601:2013) (including the need to be free of sharps such as glass fragments) and both need to be present in garden and landscaped areas. The depth of growing medium should take into account rooting depths for any proposed planting. Section A.3 of BS 3882:2015 for topsoil gives an indication of rooting depths (450mm for grass, 600mm for shrubs and 900mm for trees). The depth of topsoil should not

	normally exceed 300mm. A meeting was held with the consultant and remediation contractor to discuss the remedial approach. In essence material will be excavated, screened, deleterious materials removed, oversized materials crushed and the material reused in the area of excavation. A verification plan is set out in the report and comprises the following: Cover System: • 1 No. validation hole per completed 1 No. rear gardens. • 1 No. validation hole per completed 1 No. front gardens/front landscaped borders. • Validation holes within public open space on 25m grid. To be supported by appropriate photographic records and verification documentation. Soil Testing will be carried out in accordance to Bury Council's Developers Guide for Contaminated Land. Gas Mitigation: • Independent inspections to be carried out by Coopers for all plots and a detailed criteria is set out in the report (table 34). • Plot specific certification including photographs to be provided. Air monitoring is to be undertaken prior to and during the works as appropriate. A watching brief for unexpected contaminants will be carried out by the contractors during the works. Furthermore, the contractor will be required to maintain adequate measures to identify any suspected well and decommission this in accordance with Environment Agency guidance.
Materials Management	With regards reuse of site won materials a Materials Management Plan (MMP) is to be followed in line with CL:AIRE DoWCoP. A copy of the MMP should be provided when available. It is noted that hazardous substances have been identified onsite (PFOS and PFOA) and materials such as plastic which are unsuitable for reuse under DoWCoP. Careful handling and documentation of materials are recommended. Our previous response queried whether the site should be following the environmental permitting route to demonstrate end of waste given the presence of the onsite landfill. Advice was sought from the Environment Agency regarding the matter. They felt given the lines

	of evidence presented that the material deposited originated from the site, created by the demolition of the onsite buildings it did not constitute a waste material. Furthermore, this was backed up by good site investigation information. However, they did note that good controls should be in place for validation of the material to enable clear evidence that it is fit for purpose and suitable for use.
LCRM Stage 3 - Remediation and Verification	
Verification	Not relevant at this stage.

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.	