

Bury Metropolitan Borough Council
Hollins Strategic Land LLP

Reference: EQ-0006980/02
Customer reference: 73354
Date: 02 September 2026

Environmental Impact Assessment (EIA) Scoping Opinion Request and the EIA Scoping Report to support the proposed Outline planning application for mixed use development comprising up to 350 no. dwellings (including 50% affordable housing), employment/commercial floorspace, a local retail centre, mobility hub, public open space and associated infrastructure

Land east of Walmersley Road Bury BL9 5JX

Dear Jennie Townsend,

Thank you for consulting the Environment Agency on the above Environmental Impact Assessment (EIA) Scoping Request, which we received on 10 July 2026. In our previous response, reference EQ-0006980/01, dated 6 July 2026, we provided comments concerning land contamination. Having reviewed the consultation information further, we are providing an amended response. The land contamination comments below supersede those contained in our previous response.

Environment Agency Position

We have reviewed the following documents:

- EIA Scoping report, prepared by SATPLAN Ltd, on behalf of Hollins Strategic Land, Maldune Ltd and Belbeck Investments Ltd, dated June 2026.
 - Within this submission is a further report; Phase I Geo-Environmental Assessment Report (Ref. CMC/C4175/15029/Rev A) dated April 2026 by Brownfield Solutions Ltd.
- EH Contaminated Land Response, written by Sally Shaw, dated 23 June 2026.

The following comments, made in respect of land contamination, will ensure that the environmental statement addresses the key environmental issues for this proposal.

The submitted information characterises the potential risk to controlled waters as “moderate to moderate/low”. However, we do not consider that the information currently available provides a sufficiently robust basis for scoping land contamination and ground conditions out of the Environmental Statement.

Having reviewed parts of the included Phase I Geo-Environmental Assessment Report we advise that it is likely that any ground works on the site will have a significant impact of the environment. Environment Agency records identify two historic landfill sites within or close to the proposed development site. The historic landfill recorded as “Field North of Gin Hall”, located within the red line boundary, is reported to have accepted inert waste. The “Gin Hill” historic landfill, associated with an infilled former reservoir, is located adjacent to the site’s southern boundary.

The historic landfill deposits represent potential sources of contamination. Given the site’s location over a Secondary A Aquifer and the reported shallow rockhead, groundworks could create or alter pathways through which contaminants may migrate to groundwater. Further assessment is therefore required to establish whether viable pollutant linkages are present and whether the development could result in significant effects on controlled waters.

The report appears to rely substantially on information obtained from a ground investigation undertaken more than ten years ago. Historic investigation data may remain relevant, but the applicant has not adequately demonstrated that the information remains representative of current site conditions or is sufficient to support the conclusions reached. The age, coverage, quality and continuing applicability of the data should therefore be reviewed, with updated investigation undertaken where necessary to address identified uncertainties and data gaps.

We agree that updated, site specific investigation is likely to be required to address the uncertainties and data gaps identified in the current assessment. The scope of any investigation should be informed by an updated Preliminary Risk Assessment and conceptual site model and should provide adequate coverage of the proposed development site and relevant off-site sources.

The assessment should be supported by an updated Preliminary Risk Assessment and conceptual site model prepared by a suitably qualified and experienced competent person in accordance with LCRM. The assessment should critically review the quality, coverage and continuing applicability of the existing investigation data and identify any additional investigation required to address uncertainties and data gaps.

If land contamination and ground conditions are scoped out of the Environmental Statement, the future planning application should nevertheless provide sufficient information to assess the potential effects of the development on controlled waters. Based on our review, reliance solely on the April 2026 Phase I Geo Environmental Assessment would not provide an adequate basis for assessing those risks. In the absence of sufficient information, we may object to a future planning application because it would not demonstrate that unacceptable risks to controlled waters can be avoided.

Based on the submission to date we offer the applicant the following advice:

Advice to Applicant

Model Procedures and Good Practice

This development site appears to have been the subject of past industrial activity which may pose a risk of pollution to controlled waters.

We recommend that you should:

- Follow the risk management framework provided in Guidance on Land contamination risk management (LCRM) [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-risk-management-lcrm), when dealing with land affected by contamination
- Refer to the [contaminated land](https://www.gov.uk/guidance/contaminated-land) pages on gov.uk for more information
- Refer to [‘The Environment Agency’s approach to groundwater protection’](https://www.gov.uk/guidance/the-environment-agencys-approach-to-groundwater-protection)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites.

Please note that this response is based on the information provided at this time and if this changes in the future, we would need to consider our position again. If you have any further questions, please do not hesitate to contact me.

Yours sincerely,

Ashvi Daia

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