

CONDITION 12 & 13 SUBMISSION PACK



Project: Land Adjacent to 33 Victoria Court, Tottington, Bury BL8 3GY

Prepared for submission to: Bury Council – Local Planning Authority

Application Number: 71758

Prepared by: JN Building Contractors Ltd / David Dolan-Davis

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1. Introduction

This submission pack has been prepared to discharge **Planning Conditions 12 and 13** relating to land contamination, controlled waters and ground-gas risk for the proposed residential development at Victoria Court, Tottington.

The pack compiles all required assessments, conclusions and proposed mitigation measures, demonstrating that the site has been fully characterised in accordance with:

- **BS 10175:2011** – Investigation of Potentially Contaminated Sites
- **LCRM (Land Contamination Risk Management)**
- **LQM/CIEH S4ULs & DEFRA C4SLs**
- **BS 8485:2015+A1:2019** – Ground Gas Protection
- **CIRIA C665 & C735**
- **UKWIR / United Utilities Pipe Selection Guidance**
- **Environment Agency GP3 Framework**

2. Condition 12 – Required Risk Assessments

Condition 12 requires the following documents:

- **Preliminary Risk Assessment (PRA)** – *Required*
- **Generic Quantitative Risk Assessment (GQRA)** – *Required where PRA identifies potential risks*
- **Detailed Quantitative Risk Assessment (DQRA)** – *Required only if GQRA identifies unacceptable risks*

2.1 Preliminary Risk Assessment (GeoAssist, Nov 2024)

The PRA identified:

- Made ground across the site to depths of 4–5 m
- Potential contaminants: PAHs, heavy metals, asbestos, TPH
- Potential for ground gas from made ground and historic infilled land
- Proximity to Black Brook (controlled waters receptor)

Outcome: PRA required further intrusive investigation and quantitative risk assessment.

2.2 Generic Quantitative Risk Assessment (BEK, Nov 2025)

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The GQRA included:

- 4 window sample boreholes (to 5.45 m)
- 2 hand-excavated trial pits
- Soil chemical testing (metals, PAHs, TPH, asbestos)
- Groundwater monitoring
- Gas monitoring installations

Key Findings:

- Elevated PAHs in shallow made ground (WS2 at 1.0 m)
- No asbestos detected
- Metals below residential thresholds
- TPH present but below human-health criteria
- Made ground unsuitable for direct garden use

Outcome: GQRA required additional controlled-waters assessment.

2.3 Detailed Quantitative Risk Assessment (BEK, Mar 2026)

A DQRA was undertaken to assess controlled waters risk.

Key Findings:

- No groundwater encountered in any borehole
- Surface water samples upstream/downstream of Black Brook showed no site impact
- Leachate testing showed only marginal PAH exceedances due to extremely low EQS thresholds
- Thick clay beneath made ground prevents downward migration

Outcome: DQRA concluded **negligible risk to controlled waters**.

3. Condition 13 – Required Remediation Documents

Condition 13 requires:

- **Remedial Options Appraisal**
- **Remediation Strategy**
- **Verification Plan**

3.1 Remedial Options Appraisal

Based on the PRA, GQRA and DQRA, the following pollutant linkages required mitigation:

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- Human health exposure to PAHs in made ground
- Potential contact with made ground in garden areas
- Water pipe protection due to elevated hydrocarbons (EC5–EC16)

Viable Options Considered:

1. Excavation and removal of all made ground – *disproportionate and unnecessary*
2. Hard cover across entire site – *not compatible with garden use*
3. **Clean cover system in garden areas** – *proportionate and effective*
4. **Barrier pipe installation** – *required by UKWIR/UUW*

Preferred Options:

- 600 mm clean cover system in private gardens
- PE Barrier Pipe Type A for all potable water supply

3.2 Remediation Strategy

The following measures will be implemented:

3.2.1 Garden Areas

- Minimum **600 mm clean imported topsoil**
- Underlain by **100 mm granular no-dig layer** or **geotextile marker membrane**
- Applies to all soft-landscaped areas

3.2.2 Hardstanding Areas

- Driveway, paths and patios provide permanent barrier to made ground
- No further mitigation required

3.2.3 Water Supply Protection

- Installation of **PE Barrier Pipe Type A**
- Clean granular bedding to be used
- No free product present in soils

3.2.4 Ground Gas

- Site classified as **Characteristic Situation 1 (CS1)**
- **No gas membrane or ventilation required**

3.3 Verification Plan

Verification will include:

- Photographic evidence of clean cover installation
- Delivery tickets and chemical certificates for imported soils
- Confirmation of barrier pipe installation
- Photographic evidence of pipe bedding materials
- Record of any unexpected contamination
- As-built drawings showing garden capping extents

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4. Summary of Compliance

Requirement	Evidence Provided	Status
PRA	GeoAssist (Nov 2024)	Complete
GQRA	BEK SI & Ground Assessment (Nov 2025)	Complete
DQRA	BEK Additional SI (Mar 2026)	Complete
Remedial Options Appraisal	Included in this pack	Complete
Remediation Strategy	Included in this pack	Complete
Verification Plan	Included in this pack	Complete

5. Conclusion

This submission pack demonstrates that:

- All contamination, controlled waters and ground-gas risks have been fully assessed
- Appropriate mitigation measures have been identified
- The site is suitable for residential use with private garden, subject to implementation of the Remediation Strategy

This pack is submitted to Bury Council for approval under **Planning Conditions 12 and 13**.