



Dean Clapworthy
Bury Council Development Control

Date 5 November 2024
Reference CL295.051124.1

Dear Dean

Site of Radcliffe Leisure Centre, Spring Lane, Radcliffe, Manchester, M26 2SZ, Planning Application: 70002 – Contaminated Land

Condition Status Summary:

- **Condition 4** – Condition has previously been recommended for discharge.
- **Condition 5** – On-site in-situ testing of the topsoil placed in soft landscaped areas to demonstrate that the actual topsoil brought to site is suitable for use is required.

I write regarding the above planning application. The Environment Section has received a copy of the following report:

- Letter Response to Bury Council – Star Academy, Radcliffe (Temporary Accommodation), Brownfield Solutions, Reference: TM/C5394/13458, 3 September 2024.

The Environment Section has reviewed the above information in order to assess whether the following items requested in my previous correspondence (CL295.210824.1) have been adequately addressed:

1. Validation information to confirm that the asbestos containing materials identified have been removed, including waste transfer documentation.
2. An updated verification report which includes the following validation information:
 - On-site in-situ testing of the topsoil placed in soft landscaped areas to demonstrate that the actual topsoil brought to site is suitable for use.
 - Delivery notes for the topsoil brought to site.
 - A copy of the United Utilities water supply pipe risk assessment. Where barrier pipe is needed, validation information including photographic evidence and receipts/delivery notes for the barrier pipe are required.

The site was formerly in use as Spring Lane School (a pupil referral unit) and a Leisure Centre including a temporary swimming pool (now demolished), and a former electricity sub-station (retained on-site). Current uses in the surrounding area include housing, a Metrolink Line and station and commercial buildings. Previous uses at the site have included open land associated with a farm, followed by railway land including a goods shed and goods station. By 1979 the site

had been developed as a school. Surrounding former land uses have included a former railway line, a gravel pit, mineral water works, iron works, a rope walk, sawmill, unspecified works, a colliery and residential developments. The site is within 250m of one landfill site, known as Darbyshire Street Landfill, which is an infilled railway cutting. There are two surface watercourses situated within 250m of the site including the Manchester, Bury and Bolton Canal which flows along the northwest boundary of the site and the River Irwell to the south. The site is situated above the Carboniferous Middle Coal Measures Secondary A Aquifer which is overlain by River Terrace Deposits. Deposits of made ground exist at the site.

It is understood that the development has comprises the demolition of existing school buildings/temporary leisure centre and the construction of a two-storey temporary school building, external landscaping and associated site infrastructure.

The following remedial measures were agreed so that the contamination identified on site no longer presents a risk:

- Production of Materials Management Plan (MMP) under the CL:AIRE Definition of Waste Protocol for the re-use of soil materials on site.
- Removal of all hardstanding, floor slabs, relict foundations and in ground obstructions. Hard materials will be crushed for re-use. Samples of crush will be tested at a rate of 1 per 1000m³ (minimum of 3 samples per source) for a suite of analysis that includes metals, speciated PAHs and asbestos.
- Excavation, screening and engineering / re-use of made ground and soils. Samples of made ground will be tested at a rate of 1 per 1000m³ (minimum of 3 samples per source) for a suite of analysis that includes metals, speciated PAHs, TPH CWG, BTEX and MTBE and asbestos. Visual inspections and VOC screening using a PID will be carried out at a rate of 1 test per 250m³.
- Installation of a cover system of 450mm of 'clean' validated topsoil/subsoil within the limited areas of soft landscaping located towards the front of the site. Deeper tree pits will be used where required. The imported topsoil and subsoil, and any suitable site won soils, will be tested at a rate of 1 per 150m³ for brownfield and site won soils (minimum of 6 samples per source) and 1 per 250m³ for proven greenfield sources (minimum of 3 samples per source). Samples will be tested for a suite of analysis that includes metals, speciated PAHs, TPH CWG, BTEX and MTBE and asbestos. The results will be compared to GACs for residential without homegrown produce. The thickness of the clean cover system will be validated using trial holes and photographs.
- A United Utilities water supply pipe risk assessment will be completed to determine if barrier pipe is required on site. Where barrier pipe is required, validation information will be required including photographic evidence and receipts/delivery notes for the barrier pipe.

- A watching brief to identify and deal with any previously unidentified contamination will be maintained during demolition and clearance/soils strip works. Confirmation that no unforeseen contamination was encountered during the development will be required. This should include a photographic record of the development and should focus particularly on the excavations for the foundations in order to illustrate the ground conditions encountered.

1. Validation information to confirm that the asbestos containing materials identified have been removed, including waste transfer documentation

The pre-demolition asbestos survey identified asbestos (chrysotile and amosite) containing materials comprising insulating board, floor tiles with adhesive, textured coatings, gaskets, a resin toilet cistern and bitumen. These materials were to be removed prior to demolition.

A copy of the following report has now been provided:

- Asbestos Removal Project Completion Pack, Spring Lane School & Radcliffe Leisure Centre, Acorn Analytical Services, Reference: B-46826, Works completed between 21 March and 23 May 2024.

The report pack includes the Plan of Works and Construction Phase Plan, daily logs for the asbestos removal, air monitoring certificates, certificates of reoccupation and hazardous waste consignment notes. This Section is satisfied that the asbestos identified in the former school building was removed prior to demolition. No further information is required regarding this issue.

2. An updated verification report which includes the following validation information:

A letter response has been submitted to address the issues below:

- **On-site in-situ testing of the topsoil placed in soft landscaped areas to demonstrate that the actual topsoil brought to site is suitable for use.**

No on-site testing of the topsoil has been carried out. As stated in the remediation strategy and in Brownfields Solutions Limited letter dated 3 September 2024:

*Appendix A – Quality Control Methodology for Imported and Re-used Soils: “The imported soils should be inspected on site to confirm it is the same material inspected at source and it is suitable for use. **Once imported to site, tests should also be undertaken to confirm the batch is suitable prior to use and has not been contaminated in transit**”.*

As previously stated, the at -source testing is dated at least 9 months before the soil was imported (samples taken on 12 October 2023 and soil imported to site between 31 July and 6 August 2024). The fact that the level of testing carried out at-source exceeds the requirements of the Remediation Strategy does not mean that on-site testing is not required.

Due to the sensitive nature of the development and the requirements of the Remediation Strategy, a minimum of on-site samples of topsoil should be tested for a suite of analysis that includes metals, speciated PAHs and asbestos. It is recommended that at least 3 samples are taken in order to give some level of statistical confidence. This Section will not be in a position to discharge Condition 5 until this information has been submitted and approved.

- **Delivery notes for the topsoil brought to site.**

Delivery notes for the manufactured topsoil imported from Eaton Hill Quarry, near Congleton and brought to site by CP Aggregates have been supplied, dated between 29 July 2024 and 6 August 2024. Approximately 80 tonnes of topsoil have been imported. No further information is required regarding this issue.

- **A copy of the United Utilities water supply pipe risk assessment. Where barrier pipe is needed, validation information including photographic evidence and receipts/delivery notes for the barrier pipe are required.**

A copy of the United Utilities water supply pipe risk assessment (Brownfield Solutions Ltd, dated 20 February 2024) for the wider site for the proposed new school (Planning Application: 70071) has been provided. It is understood that PE Barrier Pipe Type B will be required in the new school.

However, the temporary school has utilised existing water mains. Photographs of standard PE Pipe being connected to the existing water main to create a temporary water supply have been provided. This Section is satisfied that this issue has been adequately addressed.

Further information is required to verify that the agreed remediation strategy has been successfully implemented.

Conclusion

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) An updated verification report which includes the following validation information:
 - On-site in-situ testing of the topsoil placed in soft landscaped areas to demonstrate that the actual topsoil brought to site is suitable for use.

Condition 5 requires the submission and approval of item (i) above.

Condition 4 has previously been recommended for discharge.

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

Rebecca Jones
Environmental Protection Officer

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