

Planning Consultation Response

Condition Discharge Application

Environment Section – Contaminated Land

Application Reference:	71775	Discharge Reference:	73409
Site:	Former Castlecroft Caravan Centre, Land at rear of Eton Hill Road, Radcliffe, Bury, M26 2ZT		
Approved Development:	Erection of 5no. covered padel courts, conversion of existing building to clubhouse and associated car parking, cycle parking and access works.		
To:	Dave Marno	From:	Sally Shaw
Our Reference:	CL1109.280826.1	Date:	28 August 2026

Recommendations
Condition Status Summary
• Condition 8 (Pre-commencement: Site Characterisation) – Recommended for discharge under our consultation response reference CL1109.171225.1 for 72601. • Condition 9 (Pre-commencement: Remediation Strategy) – Recommended for discharge under our consultation response reference CL1109.171225.1 for 72601. • Condition 10 (Prior to first use: Remediation Verification) – A satisfactory verification report has been submitted. Whilst it is noted that the application for discharge (8th July 2026) was made after the development coming into use (27th June 2026), the validation information is appropriate to recommend that the condition be discharged. • Condition 11 (Unexpected Contamination) – No unexpected contamination was encountered. As such this condition is recommended for discharge. • Condition 12 (Imported Material) – Recommended for discharge under our consultation response reference CL1109.171225.1 for 72601.

Desk Study Information	
Current use	On-site: Former caravan and motorhome service, repairs and storage centre. Off-site: Industries and businesses associated with Eton Hill Industrial Estate.

Previous contaminating land uses	On-site: Potential land rising. Off-site: Builders yard, depot, electrical substation and tanks
Environmental setting	Geology: Glaciofluvial deposits form the majority of superficial deposits with alluvium in the east. Bedrock comprises the Pennine Middle Coal Measures. Hydrogeology: Secondary A aquifer Hydrology: No on site features. Hutchinsons Goit is located 5m north east of the site. Mining: Site is within a Development High Risk Area. Record of three on site surface ground workings on/off site. Landfill/Waste: None on site. Nearest registered landfill 168m north of the site Radon: The site is not affected by radon.
Approved development	• Approved layout • Approved landscaping

Assessment / Comments	
Information Reviewed	• Verification Report, LK Consult Ltd, reference LKC261457-SCR-Love Padel R0, dated 3rd July 2026.
Information considered previously	• Phase 1 – Preliminary Risk Assessment, BEK Enviro Limited, reference BEK-25049-1, dated April 2025. • Phase 2 Geo-Environmental Investigation, Risk Assessment and Remediation Strategy, LK Consult Ltd, reference LKC251563-B1-GI-Eton Hill Road, Radcliffe R0, dated 20/11/2025.
LCRM Stage 1 - Site Characterisation and Risk Assessment	
Preliminary Risk Assessment	A PRA was submitted in support of the application and considered under our review reference, dated 23 May 2025 and found to be sufficient. Site investigation works were recommended.
Site Investigation and Generic Quantitative Risk Assessment	A site investigation was undertaken between the 17th and 20th October 2025 and considered under our reference CL1109.171225.1. The site investigation comprised: • 9no. window sample boreholes drilled to 0.40-5.45 metres below ground level (mbgl) (ref. WS101 to WS105 and WS107 to WS110). • 1no. Hand pit (using posthole digger / spade) excavated to 0.50mbgl (ref. HD101).

	Made ground was encountered across the site to depths of 0.60-1.20mbgl in the western part of the site and 2.00-3.00mbgl in the eastern part of the site. The made ground comprised <i>horizons of gravel, sand, silt, clay with anthropogenic material including ash, clinker, brick, concrete and potential small amounts of galligu-type material in the shallow strata in WS107 and WS108.</i> Obstructions (concrete) were encountered in three locations at 0.5m bgl and there was no visual or olfactory evidence of contamination. Selected soil samples were undertaken as follows: <table border="1"> <thead> <tr> <th>Testing</th><th>No. Samples</th></tr> </thead> <tbody> <tr> <td>Metals / metalloids, pH, water soluble sulphate, speciated PAHs, SOM and asbestos screen</td><td>6</td></tr> <tr> <td>Metals / metalloids, pH, water soluble sulphate, cyanide suite, phenol, TPHCWG, BTEX, MTBE, speciated PAHs, SOM and asbestos screen</td><td>3</td></tr> <tr> <td>Metals / metalloids, pH, water soluble sulphate, cyanide suite, phenol, TPHCWG, BTEX, MTBE, speciated PAHs, VOCs, SVOCs, SOM and asbestos screen</td><td>1</td></tr> <tr> <td>Waste Acceptance Criteria (WAC)</td><td>2</td></tr> </tbody> </table> Analysis results were compared to a commercial end use (C4SLs & S4ULs) and no elevations were reported. Asbestos (bundles of amosite/chrysotile fibres) was identified in five locations across the site in the upper 0.5m. All were quantified to <0.001%. Given the findings the consultant has concluded that there is the potential for asbestos to be present across the site. Internal monitoring of the retained building using a GA5000 infra-red gas analyser and a PID was carried out on 17th October 2025. This g identified a maximum PID reading of 0.1ppm, which the consultants concluded the <i>probability of volatile contaminants affecting site users as unlikely.</i> Given the proposals for the site the Consultant concluded that remedial actions are required in the landscaped/ecology area. The majority of the site is proposed to be hardstanding, so no remediation is applicable here, but site workers will need to take appropriate precautions during the build.	Testing	No. Samples	Metals / metalloids, pH, water soluble sulphate, speciated PAHs, SOM and asbestos screen	6	Metals / metalloids, pH, water soluble sulphate, cyanide suite, phenol, TPHCWG, BTEX, MTBE, speciated PAHs, SOM and asbestos screen	3	Metals / metalloids, pH, water soluble sulphate, cyanide suite, phenol, TPHCWG, BTEX, MTBE, speciated PAHs, VOCs, SVOCs, SOM and asbestos screen	1	Waste Acceptance Criteria (WAC)	2
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Detailed Quantitative Risk Assessment	Not relevant for this site.										

LCRM Stage 2 - Options Appraisal	
Remediation Strategy & Verification Plan	The approved landscaping plan indicates that soft landscaping will be installed on a 600mm high bund. A 600mm cover system is proposed in this area: • 300mm chemically validated topsoil; • 300mm chemically validated subsoil; • A separation geotextile at the base of the subsoil. It is noted from the approved landscaping plan that trees (<i>Betula Pendula</i>) are to be included. BS 3882:2015 states that trees require a growing medium rooting depth of 900mm. The Landscape Architect, NJ Landscapes, for the scheme advised in an email dated 06/08/2026 that 600mm was a sufficient depth of soil for the planting proposed.
Materials Management	A U1 and T5 exemption was recommended in the Remedial Strategy, with consideration of the CL:AIRE Definition of Waste Code of Practice if the volumes exceed exemption limits. A check of the Environment Agency Public Register did not identify any exemptions at this post code.
LCRM Stage 3 - Remediation and Verification	
Verification	The submitted report detailed the watching brief and verification of the environmental cover system. No evidence of visual or olfactory contamination was reported to the consultant by the site manager or contractor. Sufficient details regarding the imported first-generation quarried material (considered by the consultant to be suitable as subsoil) and topsoil were provided within the report, including supporting photographs. Laboratory analysis of 3 topsoil samples found the material to be below the assessment criteria. The landscape bund was demonstrated to be constructed above ground comprising 600mm (topsoil and subsoil) over a proprietary separation geotextile (Terram 1000 Orange). Three depth validations were undertaken and supporting photographs provided. The bund and completed Padel Centre can be viewed on current Google Aerial imagery dated 10th July 2026. Information online indicates that the centre opened on the 27th June 2026.

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.