

**DEPARTMENT OF
OPERATIONS**

Claire Booth
Bury Council Planning Department

Date 15 November 2024
Reference CL1095.151124.1

Dear Claire,

Land Adjacent to 1 Park Avenue, Ramsbottom, BL0 0DA, Planning Application: 69884 – Contaminated Land

Condition Status Summary:

- **Condition 5** – Construction commenced prior to discharge of the pre-commencement conditions. Further information is still required.
- **Condition 6** – A Verification Report required.

I write regarding the discharge of Conditions 5 and 6 of the above planning application. The Environment Section has received copies of the following reports:

- Phase 1 Desk Top Study, Land Adjacent 1 Park Avenue, Ramsbottom, HDG Projects Consulting Engineers, Reference: 22.161, August 2022.
- Summary Findings of Ground Contamination Tests and Remediation Strategy at Land Adjacent 1 Park Avenue, Ramsbottom, HDB Projects Ltd, No Reference, 23 August 2024 (Updated).

The Environment Section has reviewed the above information in order to assess the following points:

1. The adequacy of the desk study information, risk assessment and proposed remediation strategy.
2. Whether the information submitted is sufficient to determine that the site presents a low risk to human health and the environment.

The site is currently occupied by a building site with the proposed dwelling mostly complete. Our research indicates that current uses in the surrounding area include residential, open land and the M66 motorway. Previous uses at the site have included open land, and part of a semi-detached dwelling and garden which was built by 1937 and later extended. Previous land uses in the surrounding area have included a quarry and areas of potential waste disposal/infilling. The site is located within 250m of two landfill sites but is not in close proximity to any major surface

watercourse. The site is situated on Glacial Till Deposits over the Millstone Grit Formation Secondary A Aquifer. The site is not within a Radon Affected Area.

This section has observed that the development has started and was almost complete (in August 2024), without the pre-commencement conditions being discharged. It is noted that the application for discharge of condition dated 09 September 2024 incorrectly states that the development has not commenced.

1. The adequacy of the desk study information, risk assessment and proposed remediation strategy

The report includes a description of the site including its past historical uses. An appraisal of the site environmental setting is presented including its geology, hydrogeology and hydrological regime, mining activities, waste management issues, and identification of additional environmental sources, pathways and receptors. This information has been used to compile a clear site conceptual model, which identifies potential sources, pathways and receptors and likely pollution linkages.

The desk study information provided appears to be sufficient to assess the potential risks at the site.

A site reconnaissance visit was carried out on 4 August 2024 as part of the preliminary risk assessment. The site was found to comprise a side garden with a small extension to the adjacent property.

The preliminary risk assessment has concluded that there is low risk to human health and the environment from soil contamination and ground gas at the site. Consequently, the consultant concluded that a site investigation was not required.

However, the Preliminary Risk Assessment recommended the following remedial actions:

- 2 no. trial pits with samples tested for full CLEA suite of analysis.
- Installation of gas membrane to ground floor slab in lieu of monitoring strategy. The gas membrane was to be installed in accordance with manufacturer recommendations with validation report upon completion of installation.

The 'Summary Findings of Ground Contamination Tests & Remediation Strategy' includes details of 2 trial holes were excavated to 1.0m by Mini Soil Surveys and the ground conditions were found to comprise topsoil (100mm) over sandy clay. However, the Mini Soil Surveys logs/factual report on the investigation have still not been provided and are required.

Based on the certificate of analysis 2 no. samples of natural sandy clay were tested for a suite of analysis that included metals and speciated PAHs. No elevated concentrations of contaminants were identified when compared to C4SLs and S4ULs for residential with homegrown produce. The consultant goes on to say that the presence of hardstanding across the site (concrete hardstanding to front, and 3m patio and artificial grass to rear) will act as a barrier.

The 'Summary Findings of Ground Contamination Tests & Remediation Strategy' recommends the following remedial actions:

- External areas to comprise removal of 200 - 300mm of existing ground to accommodate hardstanding or artificial grass, over 50mm concrete capping layer, over 200-300mm of imported stone.
- Installation of gas membrane to ground floor slab.

A verification report is required for submission and should include the following information:

- Confirmation that no unforeseen visual or olfactory contamination was encountered during the development. This should include a photographic record of the development and should focus particularly on the excavations for the foundation in order to illustrate the ground conditions encountered.
- Full inspection of the installation of the ground gas protection measures (if required). This will need to include:
 - Details of the membrane installed.
 - A copy of the foundation drawings showing the measures installed.
 - Photographs displaying the membrane in situ, the sealing of any service entries and how the gas protection measures span wall cavities.

For guidance on the information needed please refer to the YALPAG Guidance on the Verification of Gas Protection Systems.

- Details of the source of the material and delivery notes and for the stone/aggregate/MOT imported to site. If recycled stone is used (rather than virgin quarried stone) chemical testing will be required to demonstrate it is suitable for use. A minimum of 3 samples is required which should be tested for a suite of analysis that includes metals, speciated PAH and asbestos. The test results should be compared to suitable generic assessment criteria.
- Details of any soil material imported to site for use in the proposed raised planter borders, including details of the source site for the material, any chemical testing carried out (a minimum of 3 samples) and assessment criteria used to show that the material is suitable for use.
- Details of any soil material excavated and removed from site including copies of waste management records.

2. Whether the information submitted is sufficient to determine that the site presents a low risk to human health and the environment

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) Mini Soil Surveys logs/factual report on the ground investigation.

- (ii) A verification report is required to validate that the work undertaken conforms to the remediation proposals received and agreed by this Section.

This Section cannot recommend discharge of Condition 5 until item (i) above have been submitted and approved.

Conditions 6 requires the submission and approval of a verification report (item (ii)).

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

A handwritten signature in black ink, appearing to read "Rebecca Jones", written in a cursive style.

Rebecca Jones
Environmental Protection Officer

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