

Planning Consultation Response

Condition Discharge Application

Environment Section – Contaminated Land

Application Reference:	71775	Discharge Reference:	72601
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:	CL1109.171225.1	Date:	17 December 2025

Recommendations
Condition Status Summary
• Condition 8 (Pre-commencement: Site Characterisation) – This Section is satisfied that the requirements of this condition have been met and that Condition 3 can be recommended for discharge. • Condition 9 (Pre-commencement: Remediation Strategy) – An appropriate remediation strategy has been put forward with regards human health. However, it is understood that trees are proposed in the landscaping area and there is insufficient depth of cover proposed to facilitate this. As the landscaping plan has yet to be approved the Remediation Strategy is sufficient to recommend discharge of the condition. However, if a landscaping plan with trees is approved the Remediation Strategy should be revised with a sufficient depth of cover to maintain the integrity of the cover system. • Condition 10 (Prior to first use: Remediation Verification) – A verification report should be submitted prior to first use. • Condition 11 (Unexpected Contamination) – This condition should remain extant throughout the development and only requires discharge if the situation arises. • Condition 12 (Imported Material) – Soil is to be imported as a remedial action. As such this condition is no longer warranted and can be discharged.
Outstanding Information
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) A materials management plan, if the [CL:AIRE Definition of Waste Code of Practice](#) is to be used.
- (ii) After completion of site works, a verification report is required to validate that the work undertaken conforms to the remediation proposals received and agreed by this Section.

Desk Study Information	
Current use	On-site: 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 • Proposed landscaping (to be approved by discharge of condition 72510).

Assessment / Comments	
Information Reviewed	• 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.
Information considered previously	• Phase 1 – Preliminary Risk Assessment, BEK Enviro Limited, reference BEK-25049-1, dated April 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 comprising: • 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	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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	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 has 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.
Detailed Quantitative Risk Assessment	Not relevant for this site.
LCRM Stage 2 - Options Appraisal	
Remediation Strategy & Verification Plan	The proposed 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 proposed landscaping plan that 3 trees (<i>Betula Pendula</i>) are to be included. Whilst tree pits are mentioned on the drawing, they are not considered in the Remedial Strategy and do depth details are provided on the drawing. Reference should be made to NCLOG's Cover Systems guide section on tree pits and the cover system design amended in the proposed location to reflect the required depth needed. It is noted from BS 3882:2015 that trees require a growing medium rooting depth of 900mm. Details of what to do should unexpected contamination be encountered during the build are provided in the report.
Materials Management	A U1 and T5 exemption is recommended, with consideration of the CL:AIRE Definition of Waste Code of Practice if the volumes exceed exemption limits.
LCRM Stage 3 - Remediation and Verification	
Verification	The submitted report details how remedial actions, including the import of soil, should be validated. A Verification report should be completed to compile this information and it should be submitted prior to first use.

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.