

Planning Consultation Response

Condition Discharge Application

Environment Section – Contaminated Land

Application Reference:	70033	Discharge Reference:	72442
Site:	Topping Mill, Topping Street, Bury, BL9 6DR		
Approved Development:	Change of use of former industrial premises (Class B2) into 15 no. residential apartments (Class C3)		
To:	Tom Beirne	From:	Rebecca Jones
Our Reference:	CL958.031125.CL1	Date:	3 November 2025

Recommendations
Condition Status Summary
Condition 3 (Site Characterisation and Remediation Strategy) – Previously recommended for discharge in letter CL958.050624.1. Condition 4 (Remediation Verification) – This Section is satisfied that the requirements of Condition 4 have been met and that this condition can be recommended for discharge. Condition 5 (Asbestos Survey) – Previously recommended for discharge in letter CL958.050624.1.
Outstanding Information
No further information required.

Desk Study Information	
Current use	On-site: Vacant mill. Off-site: Commercial and retail premises and residential.
Previous potentially contaminating land uses	On-site: Mill and works. Off-site: Cotton mills, brick works, braid mill, timber yard and sawmill, iron works, boiler works, works and reservoirs.

Environmental setting	Geology: Lower Coal Measures overlain by glacial till deposits. Hydrogeology: Secondary A Aquifer (Lower Coal Measures). Hydrology: Not within close proximity to any major surface watercourse. Mining: Not within a Development High Risk Area. Landfill/Waste: Not within 250m of a registered landfill site. Radon: Not situated within a Radon Affected Area.
Approved development	Conversion of existing mill building to residential with no outside space or soft landscaping. • Proposed groundfloor plan (dwg no. 1076-PP-05A 2) • Proposed first floor plan (dwg no. 1076-PP-05B 2)

Assessment / Comments	
Information Reviewed	• Letter regarding discharge of Condition 4, Topping Mill, Topping Street, Bury, BL9 6DR (Ref 71253, 70033), JCA Consulting, Reference: 20230239, 9 September 2025. • Letter regarding discharge of Condition 4, Topping Mill, Topping Street, Bury, BL9 6DR (Ref 71253, 70033), JCA Consulting, Reference: 20230239, 30 October 2025. • Manufacturer's specification sheet for Damplas Radon Gas Barrier 400. Previously received and reviewed: • Phase 1, Contaminated Land Assessment, Topping Mill, Topping Street, Bury, BL9 6DR, Envirosmart, Reference: 75309R1, June 2020 • Asbestos Refurb/Demo Survey, Textile Mill, Topping Street, Bury BL8 6DR, DJ Surveying, Reference: DJ181109B, 9 November 2018. • Soil vapour and ground gas risk assessment: Topping Mill, Topping Street, Bury, Ground First, Reference: 4332R1 Final, 24 January 2024.
LCRM Stage 1 - Site Characterisation and Risk Assessment	
Preliminary Risk Assessment	The preliminary risk assessment concluded that there was a potential risk to human health from potential contamination at the site and from asbestos within the building. Therefore, a site investigation was considered necessary. As the development does not include any outside space, the proposed site investigation focused on the indoor gas and vapour risk.

Site Investigation and Generic Quantitative Risk Assessment	A site investigation was undertaken on 10 January 2024 and comprised the following: • 2 no. Vapour pins - Installed through the existing ground slab to monitor sub-slab soil gas. 2 no. 16mm holes were drilled to install the vapour pins (VP1 and VP2). • 1 no. Soil Gas Samples - Gas sample taken from vapour pin VP1 and analysed for a suite of analysis that included bulk ground gases and VOCs. • Indoor air monitoring for VOCs within the current building across the ground floor and cellar areas. Readings were taken along the floor and wall joints plus any service entry points. A third 16mm hole (DRILL1) was drilled through the concrete slab to access its thickness and to take PID readings. The three 16mm holes identified a concrete ground slab (between 150mm and 325mm thick) over 'soft ground'. The existing concrete floor slab was found to be in good condition with minimal service entry points. It is understood that an additional screed layer and Visqueen (damp proof) membrane will be laid across the entire ground floor. All PID readings taken within the building and from beneath the slab (VP1, VP2 and DRILL1) were below 0.01ppm, however it is noted that the building was well ventilated due to missing windows and a poor state of repair. The gas sample taken from VP1 did not identify the presence of any elevated concentrations of methane or carbon dioxide (<0.05 % LOD). Several VOCs were present in the sample above their respective LODs. These results were initially screened against USEPA Resident Air Screening Levels, and a number of VOC exceeded these criteria including 1,1-Dichloroethane, DCE, Acetonitrile, Benzene, Tetrachloromethane, Trichloromethane, Ethylbenzene, Methylene chloride, MTBE, PCE, TCE and Vinyl Chloride. Subsequently, vapour transport modelling was carried out using the CLEA model. Average daily exposure (ADE) and Health Criteria Values (HCV) were calculated for each of the contaminants of concern. Based on these values, the concentrations of VOCs identified beneath the slab are not considered to present an indoor vapour risk to human health. This Section is satisfied that the risks to human health at the site are low.
Detailed Quantitative Risk Assessment	Not required.

LCRM Stage 2 - Options Appraisal	
Remediation Strategy & Verification Plan	Although the consultant considers the risks to human health at the site to be low, the following remedial actions have been recommended in addition to the installation of a Visqueen membrane and screed layer: - As a precautionary measure, (where feasible) some passive ventilation is maintained within the cellar room (which includes windows positioned above the external ground level) in order to avoid the potential accumulation of any localised soil vapours or ground gases. - The drainage cover present within the cellar room is appropriately sealed, in order to avoid the potential ingress of any localised soil vapours or ground gases. - The three 16 mm diameter holes recently drilled within the building floor slab (at locations VP1, VP2 and DRILL1) should also be appropriately sealed prior to any further development works. Verification information will be required to demonstrate that these recommendations and the installation of the Visqueen Membrane/screed layer have been completed.
Materials Management	Not required.
LCRM Stage 3 - Remediation and Verification	
Verification	The following verification information has been provided: Installation of the Visqueen Membrane/screed layer – Verification information including photographs have been provided to demonstrate that the membrane (Damplas Radon Gas Barrier 400) was installed beneath the screed layer. The manufacturer's specification sheet has been provided for the radon barrier used. Passive ventilation within the cellar room – A statement that the passive ventilation has been maintained to the cellar room has been provided. Photographs show that the ground level windows to the cellar have metal grills to allow ventilation and prevent the potential accumulation of any localised soil vapours or ground gases. Sealing of drainage cover present within the cellar room – A statement has been provided that this action has been completed. Photographs of the sealed cover have been provided.

	• Sealing of 3 no. holes drilled within the building floor slab as part of the site investigation – A statement has been provided that this action has been completed.
Asbestos in the Existing Building	A pre-refurbishment asbestos survey report has been provided. The survey identified a number of asbestos containing materials (ACM) (chrysotile and crocidolite) and suspected ACM within the building as follows: • Vinyl floor tiles, floor tile adhesive and panel to an ironing board in the ground floor storage area. • Pipe insulation, cement flue and boiler components in the basement boiler room. • Vinyl floor tiles in the stairway. • Electrical components in the ground floor workshop. • Toilet cistern in the ground floor female WC. • Flash pad in the first-floor workshop. • Sink pad in the kitchen area. Statements of Completion (produced by REC) for ACM removed from the building between 25 June and 1 July 2019 by RS Asbestos Ltd have been received within the Ground First report. A site inspection carried out by Ground First in January 2024 confirm that all identified materials had been removed. This Section was satisfied that the ACM identified in the survey has been removed.

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.