



**DEPARTMENT OF
OPERATIONS**

Dean Clapworthy
Bury Council Planning Department

Date 12 December 2024
Reference CL1038.121224.1

Dear Dean

**Radcliffe Civic Hub, 13-21 Blackburn Street, Radcliffe, Manchester, M26 1NN, Planning
Application: 69388 – Contaminated Land**

I write regarding the discharge of Condition 4 of the above planning application. The Environment Section has received copies of the following reports:

- Verification Report for the Remediation and Preparatory Works of land at Radcliffe Hub, Radcliffe, ID GeoEnvironmental, Reference: 5238-G-R003 Date: September 2024.
- Radon Gas Protection Measures Verification Implementation Plan for Radcliffe Market Hall, Radcliffe, ID GeoEnvironmental Limited, Reference: 5238-G-R006, November 2024.

The Environment Section has reviewed the above information in order to assess whether the following items requested in my previous correspondence (CL1038.220824.1) have been adequately addressed:

1. 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.

The site was formerly occupied by Radcliffe Market Hall, Radcliffe Market Chambers, Radcliffe Plaza, a block of retail and commercial premises and a public house. Adjacent land use includes retail and commercial buildings, a carpark and supermarket and a sorting office. Previous land uses at the site have included a dye works, an electricity substation commercial and retail properties, housing, a market hall and marketplace and a bus station. Previous land uses within the surrounding area have included dye works, cotton and textile mills, iron works, chemical works, a gas holder, a preserve works and areas of potential waste disposal. The site does not lie within 250 metres of any known landfill sites but lies adjacent to the River Irwell. The site is situated on the Middle Coal Measures and Nob End Rock Secondary A Aquifers. Overlying drift deposits are likely to be absent or comprise River Terrace Deposits. The site is situated within a Radon Affected Area (Category 3 and Category 2) where up to 3-5% of homes are estimated to exceed the Action Level.

It is understood that the proposed development comprises:

- Demolition of 13-21 Blackburn Street/TSB Bank.
- Construction of a three-storey civic hub building (leisure centre and library).
- Construction of a link block between Radcliffe Market and Market Chambers buildings.
- Refurbishment of the Market Chambers and Market Hall basement, for use as a multi-use event space.
- Associated external alterations and works and hard and soft landscaping.

1. 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.

A Remediation Strategy has previously been received and agreed for Radcliffe Hub:

- Remediation Statement for Land at Radcliffe Civic Hub (Report Ref. 5238-G-R002, dated April 2023).
- Hazardous Gas Protection Verification Implementation Plan for Radcliffe Civic Hub, Report No. 5238-G-R004, dated August 2024. (ID Geoenvironmental).

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

- **Removal of asbestos containing material from all buildings prior to demolition.**

Copies of Asbestos Surveys for the buildings to be demolished or refurbished have previously been received and reviewed (CL1038.220824.1). Asbestos containing materials (ACM) (chrysotile and amosite) were identified in the majority of buildings.

ACM was removed prior to demolition of the buildings at Blackburn Street and Dale Street by Rhodar and reports produced demonstrating the safe removal including air monitoring:

- Site Pack, Radcliffe Civic Hub - Dance Freak, Rhodar, Reference: NTH005188 Warrington, 4-8 September 2023.
- Site Pack, Radcliffe Civic Hub, Rhodar, Reference: NTH004277 Warrington, 17 Apr-6 June 2023.
- Site Pack, Radcliffe - Former Boots, Rhodar, Reference: NTH004277 Warrington, 30 May-6 June 2023.
- Daily Activity Briefing records dated 17-28 April, 2-31 May, 1-5 June, 5-8 September 2023.

Waste transfer notes have been provided for bonded asbestos (chrysotile) and fibrous asbestos (amosite) removed from site on 17 June 2022, 27 April 2023, 25 May 2023, 28 September 2023 and taken to Whit Moss Landfill, Skelmersdale for disposal.

There does not appear to be a Rhodar Site Pack for Radcliffe Market Hall where asbestos containing materials were identified. Please provide further information regarding the removal of asbestos from the Market Hall building.

- **Site turnover to 1.5m bgl to remove any relic foundation or obstructions.**

Following removal of hardstanding/concrete floor slabs and prior to the turnover commencing, a post demolition trial pitting exercise was undertaken on 5 January 2024 as required by the remediation strategy. A total of 9 no. trial pits (TP01-TP09) were excavated and ground conditions were found to comprise mainly granular made ground containing ash and demolition materials. A thin basal horizon of made ground with a cohesive matrix was proven locally in TP04 and TP05. Natural strata comprised Glaciofluvial Deposits (sandy gravelly clay) in vicinity of TP01-TP03 to west, and granular sand deposits in the remainder of the site. No groundwater was encountered during the investigation.

A total of 5 no. samples were tested for a suite of analysis that included metals, PAHs, TPH and asbestos. No elevated concentrations of contaminants were found but chrysotile asbestos was identified in TP04 at 0.2m however, concentrations were less than 0.001%; consequently based on the Remediation Strategy no remediation was required. Good practice measures to ensure dust is not emitted during the development works (such as dampening down) were recommended and no changes to the agreed remediation strategy were required.

A watching brief was kept during the site turnover works and no unexpected or gross contamination was encountered. Photographs of the ground conditions and relict foundations/infrastructure encountered during the site turnover have been provided.

- **Production of site won 6F2 by crushing all hardstanding, masonry, concrete etc from site turnover and demolition.**

Photographs of the stockpiled crushed material and placement of the piling mat have been provided. However, no chemical testing data has been provided as required by the Remediation Strategy. Samples of 6F2 used for general fill were to be taken and tested for volatile contaminants (naphthalene, BTEC and speciated TPH) and asbestos, with the results compared to commercial generic assessment criteria. Please provide details of the chemical testing carried out on the site won 6F2 to demonstrate its suitability for use.

- **Re-use of site won soils/material will be under the CL:aire Definition of Waste Protocol. A Materials Management Plan will be produced.**

Copies of the Materials Management Plan (completed by ID Geoenvironmental Ltd, Reference: 5238 V-1-R0, 11 December 2023) and QP Declaration (submitted 13 December 2023) for the re-use of site won material at the site, have previously been received.

- **Excess or unsuitable soils should be disposed of at a suitably licenced waste disposal facility.**

Waste transfer notes provided for construction and demolition, and plasterboard waste removed from site on 8, 9, 13, 15, 17, 21, 22, 23, 27, 28, 29 and 30 June 2022 by JWS Waste and Recycling Services. It is unclear whether the waste removed included excess soil material. Please provide further information, including waste transfer notes, for any soil material removed from site.

- **Decommissioning and grouting of borehole BH07 due to the risk of sub-artesian groundwater impacting excavations during the development.**
Photographs of the works to decommission and grout BH07 have been provided.

The following Build Phase remedial actions are outstanding:

- **Clean imported topsoil/subsoil to be placed in soft landscaped areas (minimum 600mm thick) to provide a growing medium.** All cover soils placed within 0.6m of the surface will be tested and the results will be compared to assessment criteria equal to three times the generic assessment criteria residential land-use, which will be lower than the values for commercial end-use.

Please note that validation of the depth of cover placed, in the form of trial holes and photographs, is required.

- **Radon Protection Measures as the site is located within a Category 3 Radon Affected Area.** The measures will comprise a radon gas resistant gas membrane across the entire footprint of the building. Basement areas will be tanked. An Implementation Plan, which details the measures (foundation drawings), chosen membrane and installation methods will be produced prior to commencement of construction. Independent verification will be completed. A programme of post construction radon monitoring within the new buildings will be undertaken.

The Radon Gas Protection Measures Verification Implementation Plan for the Radcliffe Hub building (Reference: 5238-G-R004, 9 August 2024) has previously been received and approved (CL1038.130824.1).

Radcliffe Market Chambers

A Radon Gas Protection Measures Verification Implementation Plan has now been provided for the Radcliffe Market Chambers building (Reference: 5238-G-R006, November 2024). The Market Hall Chambers basement redevelopment will incorporate new piling and ring beam sections to support new cast in-situ floor slabs, in conjunction with the pre-existing original foundations.

The following Sika gas resistant products will be used:

Basic Radon Gas Protection Measures	Products Used
Gas Protection Membrane/DPM	SikaProof A-08 Membrane
Concrete Surfaces	SikaDur 32 Epoxy Liquid Barrier
Service Penetrations/ Steel Work Penetrations	SikaProof A-08 Membrane SikaProof Tape-150 SikaProof Patch200 SikaDur 32 Epoxy Liquid Barrier
Corner/ Threshold Detail	SikaProof Patch200 SikaProof FixTape50
Sealing Tape	SikaProof Tape-150 SikaProof ExTape 150
Additional related Products (for waterproofing and/or surface preparation elements only)	Sikadur Combiflex Adhesive SikaDrain 850

The verification actions will comprise independent visual inspection, air-lance integrity testing, and mechanical point stress testing (where air-lance testing is not possible due to complex design, limited access or the presence of steelwork). These actions will be undertaken and reported on in a verification report by ID GeoEnvironmental.

Copies of the foundation drawings illustrating the measures to be installed and copies of the manufacturer's specification sheets for the chosen products have been included in the Implementation Plan. Post-completion radon gas monitoring will be carried out within the building following completion of the development. This will be carried out and reported on by a separate specialist contractor.

The proposed radon protection measures and verification plan are acceptable to this Section.

- **Management of invasive species** (Japanese Knotweed, Himalayan Balsam and Giant Hogweed) located along the bank of the River Irwell by the Market Hall and along the River Irwell. Further applications of herbicide are proposed and validation information for the treatment and management will be submitted.

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:

- An updated Remediation/Preparatory Works Verification Report is required to validate that the work undertaken conforms to the remediation proposals received and agreed by this Section. This should include the following additional information:
 - Verification information for the removal of asbestos containing materials from Radcliffe Market Hall building.
 - Chemical testing carried out on the site generated 6F2 to demonstrate its suitability for use.



- Verification information for any soil material removed from site including waste transfer notes

(ii) Build Phase Verification Report for Radcliffe Hub and Radcliffe Market buildings.

Condition 4 requires the submission and approval of items (i) and (ii) above.

Condition 3 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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