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Department for Operations

Dean Clapworthy
Bury Council Development Control

Dear Dean

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

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

- Constraints Desk Study, Radcliffe Town Centre, Arup, Reference: RAD-ARP-RP-CG-0001 Issue 2, 12 April 2021.
- Geoenvironmental Appraisal of land at Radcliffe Hub, Radcliffe, ID GeoEnvironmental Limited, Reference: 5238-G-R001 Rev B, August 2022.
- Remediation Statement for land at Radcliffe Hub, Radcliffe, ID GeoEnvironmental Limited, Reference: 5238-G-R002 Rev B, April 2023.

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

1. A copy of Arup desk study completed in April 2021.
2. Validation information for the invasive species eradication plan.
3. Asbestos surveys for the Market Hall-Market Chambers Link Building and 1-9 (odd no.) Dale Street and 9-23 (odd no.) Blackburn Street.
4. Clarification of where the samples were taken from in WS04 and BH06 as the depths on the certificates of analysis and borehole logs do not match.
5. Further investigation and soil sampling within the footprints of the current buildings once they have been demolished.
6. A detailed remediation strategy and validation plan which incorporates the findings of any further investigation undertaken following demolition of the current buildings.
7. 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 is currently 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 the demolition of 13-21 Blackburn Street/TSB Bank and construction of a three-storey civic hub building (leisure centre and library), a link block between Radcliffe Market and Market Chambers buildings, and the refurbishment of Market Chambers and Market Hall basement, for use as a multi-use event space, with associated external alterations and works and hard and soft landscaping.

1. A copy of Arup desk study completed in April 2021

A copy of the Arup Desk Study report has been received. No further information is required regarding this issue.

2. Validation information for the invasive species eradication plan

It is understood that a programme of treatment is being undertaken for the Japanese Knotweed, Himalayan Balsam and Giant Hogweed located along the bank of the River Irwell by the Market Hall. The first application of herbicide was completed in September 2022, a second treatment will be carried out soon. The management of invasive species will be limited to where the balcony will be installed on the Market Hall.

Details of the treatment and management undertaken should be included in the validation report for the development.

3. Asbestos surveys for the Market Hall-Market Chambers Link Building and 1-9 (odd no.) Dale Street and 9-23 (odd no.) Blackburn Street.

No additional information has been submitted. It is understood that asbestos surveys have been carried out on some units and that further surveys will be completed on the remaining units. Please submit the asbestos survey reports once they have been completed.

Validation information, including waste transfer documentation, will be required to demonstrate that any asbestos containing materials have been removed.

4. Clarification of where the samples were taken from in WS04 and BH06 as the depths on the certificates of analysis and borehole logs do not match

An updated copy of the site investigation report has been submitted, which clarified the depths the samples were taken from:

- BH06 - Sample depths are 1.40-1.7m and 2.2-2.5m.
- WS04 – Sample depth is 0.8-1.0m.

No further information is required regarding this issue.

5. Further investigation and soil sampling within the footprints of the current buildings once they have been demolished

During a meeting on 20th April 2023, it was agreed that as a full site turnover to 1.5m bgl is to be completed, this would identify any additional contamination, and therefore, no further investigation will be required. The site turnover will be supervised by an engineer from ID Geoenvironmental and additional sampling will be carried out as required. Full details of how the site turnover and watching brief will be completed and provided in a Remediation Statement and Validation Plan to be produced by ID Geoenvironmental.

6. A detailed remediation strategy and validation plan which incorporates the findings of any further investigation undertaken following demolition of the current buildings.

A Remediation Statement and Validation Plan has been produced by ID Geoenvironmental. The following measures are proposed so that the contamination identified on site no longer presents a risk:

- **Removal of asbestos containing material** from all buildings prior to demolition. Validation information will be provided.
- **Site turnover to 1.5m bgl to remove any relic foundation or obstructions.** A watching brief will be kept during these works to identify and deal with any contamination not previously identified during the site investigation. Following removal of hardstanding or concrete floor slabs and prior to the turnover commencing, an engineer will attend site to excavate a number of trial pits to investigate the made ground and to demonstrate the absence of gross contamination prior to turnover.

Samples (minimum 10) will be taken and tested for a suite of analysis that includes, as a minimum, metals, speciated PAH, BTEX, speciated TPH and asbestos. Results will be compared to commercial generic assessment criteria. Any area where elevated concentrations of contaminants are found will be remediated. Validation testing will be completed. A photographic record of all the works will be kept.

- **Production of site won 6F2** by crushing all hardstanding, masonry, concrete etc from site turnover and demolition. Samples of 6F2 used for general fill will be taken and tested for volatile contaminants (naphthalene, BTEC and speciated TPH) and asbestos. Results will be compared to commercial generic assessment criteria. Environmental monitoring for dust and asbestos fibres will be undertaken if required.
- **Re-use of site won soils/material** will be under the CL:aire Definition of Waste Protocol. A Materials Management Plan will be produced.

- **Excess or unsuitable soils should be disposed of at a suitably licenced waste disposal facility.** Validation information including waste transfer notes will be kept.
- **Decommissioning and grouting of borehole BH07** due to the risk of sub-artesian groundwater impacting excavations during the development.
- **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, will be 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 will detail the measures (foundation drawings), chosen membrane and installation methods will be produced prior to commencement of construction. Independent verification will be completed.

It is understood that a programme of post construction radon monitoring within the new buildings will be undertaken. Details of the monitoring programme should be included in the Implementation Plan.

- **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.

The remediation strategy is acceptable to this Section. The remediation strategy should include the findings of any further investigation undertaken following demolition of the current buildings.

Please ensure that a copy of the Radon Gas Protection Measures Implementation Plan is submitted prior to the commencement of the build phase.

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.

7. 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 verification report will be submitted in due course.

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:

- (i) Asbestos surveys for the Market Hall-Market Chambers Link Building and 1-9 (odd no.) Dale Street and 9-23 (odd no.) Blackburn Street.
- (ii) A copy of the Materials Management Plan.
- (iii) A copy of the Implementation Plan for the radon protection measures and post completion monitoring programme.
- (iv) 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 above information will be required by planning conditions, if permission is granted.

Please do not hesitate to contact me if you require any clarification of the above.

Yours sincerely



Rebecca Jones
Environmental Protection Officer

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 responsibility for safe development rests with the developer.

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