



To	Head of Planning	FAO: Jennifer Atkinson
From	Strategic Lead Compliance & Enforcement	
Date	26 June 2025	
Telephone	[REDACTED]	

Consultation on Planning Application

Application No: 143024/FO/2025
Location: Sister Plot C, Former Umist Campus, Altrincham Street, Manchester, M1 7JA
Proposal: Phased development comprising: Phase A - demolition of existing buildings and structures, erection of a basement (C1 Building and C2 Building) and a podium across lower ground and upper ground floors comprising flexible commercial space (Class E and/or Sui Generis drinking establishment), erection of a building (C1 Building) to form offices (Class E), landscaping works, highways, access, servicing, infrastructure and other associated works; Phase B: erection of a podium across lower ground and upper ground floors and a new building (C2 Building) to form offices (Class E) and flexible commercial and community uses (Class E, F2 and/ or Sui Generis drinking establishment), alterations to the existing Sculptural Wall (Hollaway Wall), relocation of existing art work, landscaping works, highways, access, servicing, infrastructure and other associated works; Phase C - change of use and associated works to railway Viaduct arches to form flexible commercial units (Class E, and/ or Sui Generis - drinking establishment) including highways, access and servicing arrangements, and other associated works.

My officer, [REDACTED], writes in response to your memo of 30 May 2025 regarding the above planning application. The Contaminated Land Section has received a copy of the following reports:

Phase 1 Desk Study and Data Review, Sister – Plot C and Enabling Works Area, Civic Earth, Reference: 51019-CE-XX-XX-R-G-1001, Issue 5, 30 April 2025.
Site Investigation Report, Sister – Plot C and Enabling Works Area, Civic Earth, Reference: 51019-CE-02-XX-R-G-1002, Issue 4, Dated: 30 April 2025
Chapter 17 Ground Conditions in the Environmental Statement

The Contaminated Land Section has reviewed the above information in order to assess the following points with regards to **human health and ground gas only (EA commenting on controlled waters)**:

1. The adequacy of the desk study information available for this site.
2. The adequacy of the site investigation.
3. The adequacy of the final risk assessment.
4. The acceptability of the proposed remediation strategy.
5. Whether the information submitted is sufficient to discharge the relevant contamination and/or gas condition from the planning approval.

The site is located at 384707E, 397648N and is approximately 2.2ha in area. The site is currently occupied by former university buildings (Barnes Wallis, Wright Robinson and Moffat Buildings), a butterfly staircase and garden, a railway viaduct and the Grade II listed Holloway wall. Adjacent land use includes further university buildings, student halls of residence (existing and under construction) and Vimto Park. Previous land uses on and adjacent to the site have included a cotton mill, a boiler and engine house, residential houses, a school, nut and bolt works, an iron works/foundry, a warehouse, a depot, a chemical works, a retort house and a cloth finishing works. The site does not lie within 250 metres of any known landfill sites, but is in close proximity to Charles Street culvert/Shooters Brook (culverted under the wider Sister site) and lies above the Chester Formation (Sherwood sandstone group) principal aquifer.

The river Medlock was once culverted beneath the site, but the culvert has since been moved/redirected to outside of the wider Sister site. A network of tunnels are also present beneath the site (UMIST tunnels)

1. The adequacy of the desk study information available for this site

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 UOM outlines that general chemicals, oils, mercury and lead were used within the university's buildings within the Enabling Works area, with one part of the Mill used as an animal unit prior to the university's use of the building. The use of general chemicals, carbon dust, oils, metal particulates, mercury, lead, concrete and silica dust, bleach and radioactive substances were used within the university's buildings across the rest of the wider Sister area. In addition, asbestos was noted to be present within the buildings.

The desk study information was found to be **adequate**.

2. The adequacy of the site investigation

A review of site investigation and risk assessments carried out at the site can be summarised as follows:

- Summary provided of previous SI by AEG in 2019 (elevated lead and asbestos in soil, elevated lead, selenium, naphthalene and fluoranthene in groundwater, ground gas CS1). Further SI needed due to limitations of this investigation as it covered the wider Sister site and not sufficient SI within plot C area.

- Four phases of investigation undertaken by Civic Earth (within Plot C and in the wider enabling works area)
- Seven ground gas monitoring rounds undertaken (five boreholes on site, four with response zones in the made ground and one in alluvium).
- Twelve monthly groundwater monitoring visits (twelve boreholes on site).
- Three rounds of groundwater sampling from the principal aquifer.
- Soil samples analysed for a broad range of contaminants including pH, SOM, total cyanide, heavy metal suite, PAH, TPH, phenols, BTEX compounds, VOC, SVOC, PCB and asbestos screen, identification and quantification.
- Made ground confirmed to a maximum depth of 8.40m bgl (average thickness of 3m), containing gravel of brick, concrete, dolomite, macadam, granite, clinker, wood, sandstone, siltstone and coal. Frequent ash was also noted.
- Deeper made ground associated with the infilled river channel.
- Alluvium and glacial till found beneath the made ground over the Chester formation.
- Visual and olfactory evidence of hydrocarbon contamination in BH1005 located on the red line boundary of this site. No evidence in the down gradient borehole BH1017.
- Also, hydrocarbon/organic sheen on groundwater from WS1002 and black staining on the concrete recovered from BH1016A. Slight hydrocarbon odour and black staining in WS2003 (within the wider Sister site, not within this red line boundary).
- Obstructions recorded in the form of former foundations, brick/concrete slabs and suspected brick walls.
- Perched water in the made ground and glacial till, also groundwater encountered in Chester Formation.
- Groundwater flow to the southwest.

The site investigation and risk assessment are considered appropriate for the site and appear consistent with recognised guidance and best practice.

3. The adequacy of the final risk assessment

Ground Assessment: The soil chemical results have been compared to C4SLs and S4ULs for a Commercial end use. The following contaminants have been found to elevated; total cyanide, benzo(a)pyrene, benzo(b)fluoranthene and dibenzo(a,h)anthracene. Elevated PAH all from BH1002 and they are considered outliers and represent a hotspot of contamination (also VOC and SVOCV contamination above the laboratory LOD). Further elevations have been noted should the site be residential, but this is now longer applicable. Asbestos has been found in samples as loose fibres and fibrous debris of chrysotile and amosite.

The concentration of TCE in borehole BH1016A is noted to be below the GAC for a commercial end use (2.6mg/kg); however, the concentration is recorded to marginally exceed the residential GAC (0.036mg/kg). The concentration recorded is noted to be within an order of magnitude of the residential GAC and in addition, is located within the area of Plot C which has a proposed commercial end use; the borehole is not located in proximity to the area subject to future potential residential development (i.e. falls within Plot F).

Elevated cyanide WS1022B (nearest to the former retort house) compared to a commercial end use (elevations related to residential not applicable for this area of the site).

Marginal elevations in the natural soils. No elevations in topsoil in this part of the site.

The site has been classified as Low to Moderate risk. Remediation is required.

Controlled Waters Assessment: EA to provide comments for this site.

Ground Gas Assessment: Gas monitoring has been undertaken on 7 no. occasions over 5 months, which is in accordance with CIRIA 665 for a site with a Very Moderate gas generation potential and a Low development sensitivity. This is deemed consistent with recommended guidance and is deemed appropriate for a site of this nature.

A gas screening value (GSV) of 0.0211l/hr has been derived using the maximum gas concentration for carbon dioxide (21.2%v/v) and the maximum flow rate (0.1l/hr). This is deemed consistent with recommended guidance and is deemed appropriate for a site of this nature.

On this basis the report recommends the incorporation of gas protection measures to comply with Characterisation Situation 2 (CS2) and gas protection measures for new buildings and/or confined spaces consistent with that classification are required.

The final risk assessment was found to be **adequate** pending the further proposed delineation works.

4. The acceptability of the proposed remediation strategy

The following further works are proposed to delineate contamination identified on site:

- BH1005 Gross Hydrocarbon hotspot additional investigation and delineation
- Made ground hotspot removal (BH1002, BH1004, ARP-BH002 and ARP-BH007) – contamination to be delineated and removed/treated.
- Grubbing out and removal of historical drainage runs with verification sampling
- Watching brief and discovery strategy.

The following remedial works are proposed so that the contamination identified on site no longer presents a risk:

- Removal of hotspot contamination
- Decommissioning of boreholes
- Installation of gas protection measures – detailed design is still pending.
- Capping for landscaped areas – 400mm of imported soil, including 150mm topsoil over geotextile separator (need to also account for root depths for larger shrubs/trees)
- Imported soil to be shown to be suitable for use.
- Material movements under a MMP
- Asbestos management under the Control of Asbestos Regulations.
- Mitigation of risks to controlled waters.
- Piling works risk assessment.
- Barrier pipes are anticipated to required, UU risk assessment to be completed.

The site investigation and final risk assessment for this development have identified levels of contamination that will require remediation prior to the site being suitable for its intended use. This Section requires submission of a detailed remediation strategy for approval before the commencement of any remedial works on site.

5. Whether the information submitted is sufficient to discharge the relevant site investigation and/or gas condition of the planning approval

Before this Section can recommend discharge of conditions from this application, the following information needs to be submitted to the Council for approval:

- (i) Submission of addendum SI for the recommended delineation works.
- (ii) Submission of a Remediation Strategy.
- (iii) 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.

Please do not hesitate to contact [REDACTED] if you require any clarification of the above.

Samantha Stabler
Head of Compliance, Enforcement and Community Safety