Manchester City Council
Development Control
PO Box 488
Manchester
Lancashire
M60 2JT

Our ref: SO/2025/125042/01-L01
Your ref: 143024/FO/2025

Date: 18 July 2025

FAO: Jennifer Atkinson

Dear Jennifer,

SISTER PLOT C 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 ARTWORK, 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.**

SISTER PLOT C WORK PACKAGE, FORMER UMIST CAMPUS, LAND OFF ALTRINCHAM STREET, MANCHESTER, M1 7JA

Thank you for consulting the Environment Agency (EA) on the above planning application governing Plot C of the Sister Strategic Re-Development Site. Initial referral for this application was received by the EA on the 30th May 2025.

Further to current formal planning submissions made available on the planning portal for 143024/FO/2025 (May 2025 uploads), we understand that the applicant/agent has now further formally submitted (17/07/2025) , in connection with ongoing preliminary engagement work regarding the determination site remedial requirements, the following:

i. Demolition and Remediation Phasing Technical Note – Plot C Sister. Document Ref: 51019-CE-02-XX-R-G-1007. Revision P01. Prepared by Civic Earth. Dated 15/07/2025.

We advise the above report (i) above has been factored in our planning position/conditional requirements determination detailed within this letter and has informed our further general review context/understanding (see detailed in letter section below).

Noting the above report (i) is material to our current planning position statement, we kindly as that this uploaded as part of the formal evidence base for 143024/FO/2025 if not already done by the time of this letters receipt.

Note to Applicant/Agent/Planning Authority – Demolition and Remedial Phasing Technical Note (i)

Sequencing/phasing of site works notwithstanding, noting section 'Earthworks and Remedial Works' of the report (i) which details those earthworks (3 phases) which details those work considered to be required to achieve final development formation levels, we advise that whilst current scope of works proposed is acknowledge by the EA, it is advised a full finalisation/acceptance by the EA of those earthworks required in association with the proposed development will only be possible upon a firm determination of site remedial requirements/needs (note remedial strategy pre-commencement condition detailed below).

For avoidance of doubt and position clarity, the EA's more immediate acceptance of the technical note (i) for the purpose of determining whether to grant 143024/FO/2025 should not be regarded as a wider acceptance of site remedial requirements/final earthworks necessitated for realisation of the proposed development.

EA General Review / Planning Position Context

We advise the Local Planning Authority (LPA) / Manchester City Council (MCC) that, respective to EA planning remit and focus, our general understanding for the purpose of this planning application and conditional requirements, detailed below, is as follows:

1. Progression of the development will be sequenced as follows:
    - Demolition (to slab)
    - Completion of remedial works
    - Completion of piling works (following remedial works enactment)
    - Progression of development construction works, Phases A-C, post-remedial/enabling works completion.

2. Site remedial works will be completed in a single tranche - there is no current intention to sequence/phase site remedial works respective to the construction phases outlined for 143024/FO/2025 (Phases A-C).

3. It is intended to exclude the demolition of pre-existing on-site buildings to ground/slab-level from the scope of any pre-commencement conditions placed upon 143024/FO/2025.

4. Further to land contamination report formally submitted to date, it is acknowledged by the applicant/developer that addition site investigations will be necessary to determine final site remedial requirements/needs respective to ensure the protection of controlled water resources.

5. Further to current drainage strategy reporting submitted, it remains to be

Cont/d..

determine/confirmed whether formalised infiltration drainage will be utilised within the proposed development.

Should any of our understanding outlined above prove incorrect, or alternatively should there be change of developer intentions (e.g. sequencing of site works) prior to determination of 143024/FO/2025, then we ask that we are notified by the LPA/MCC and provided the opportunity to make further representation to this application.

Environment Agency Position - 143024/FO/2025

As submitted (including (i) above), we have objection, in principle, to the grant of planning permission for 143024/FO/2025 provided that the following conditions (detailed below) are included as part of any subsequent planning approval made.

Should MCC be minded to approve the grant of planning permission, as submitted, in absence of our current conditional requirements then we advise that we would be minded to object to the proposed development in accordance planning practice guidance e.g. the National Planning Policy Framework (NPPF).

Associated with the above, we also request that we are consulted should MCC be minded to approve the grant of planning permission with materially different condition wording to that requested.

EA Groundwater and Contaminated Land (GWCL) Conditional Requirements

To inform our planning position statement above / planning requirements conditions below, our GWCL Team has reviewed, with respect to the management of potential risks to controlled waters from land contamination, the following technical submissions made by the applicant/agent:

- Chapter 7 Ground Conditions of Plot C, Sister Environmental Statement: Volume 1, May 2025.
- Appendix 17.1 Sister – Plot C and Enabling Works Area, Phase 1 Desk Study and Data Review, prepared for ID Manchester Limited and University of Manchester, Ref. 51019-CE-XX-XX-R-G-1001, P05 – fifth issue, dated 30 April 2025.
- Appendix 17.2 Sister – Plot C and Enabling Works Area, Site Investigation Report, prepared for ID Manchester Limited and University of Manchester, Ref. 51019-CE-XX-XX-R-G-1002, P04 – fourth issue, dated 30 April 2025.

We advise the previous use of the proposed development site has included a number of potentially contaminating historical activities. Relevant information from Civic Earth's Site Investigation Report is summarised as follows:

Made Ground generally up to 3.0 to 4.0m in thickness. The depth of Made Ground was not proven in some exploratory holes. Table 4 within the report summarises Made Ground on site as containing "…*brick, concrete, dolomite, macadam, granite, clinker, wood, sandstone, siltstone and coal. Cobbles are angular of brick and sandstone. Frequent ash noted." Cohesive horizons* are also noted in the description summary.
Obstructions are noted within Table 16.
"Black staining was noted on the concrete recovered from borehole BH1016A between 3.60mbgl and 3.70mbgl.
A high ash content / frequent ash was generally recorded within the Made Ground

as well as fragments of clinker and slag. The fragments of clinker and slag were recorded in boreholes WS1001, WS1003, WS1005, WS1012, WS1022, WS1022A, WS1022B and WS1024."
Contamination observed: Section 5.8 describes the presence of free phase with an oily sheen noted within BH1005 during drilling. *"A potential hydrocarbon or organic sheen was observed on the groundwater extracted from borehole WS1002..."*
Infilled river channel with deeper Made Ground
Former use residential / smaller structures
Chemical Works
Iron Foundry
Cotton Mill
Nut and Bolt Works
Cloth Finishing Works
Tank
Laboratories and chemical stores within university, including mercury, solvents and radiological substances. Residual sources of contamination are noted as potentially present within the building drainage system (as noted with respect to chloroform)
Retort House – possibly associated with former coal gas works that may have been associated with the former Cotton Mill
UXO potential and associated contamination. The report notes "*the wider Sister area sustained serval bomb strikes, two of which were on the Sackville Building in August 1940 and June 1041*."

Further intrusive ground investigation is required/proposed to be undertaken. Areas of the site proposed development site present a 'medium risk' of contamination that could be mobilised during construction to pollute controlled waters.

Controlled waters are particularly sensitive in this location because the proposed development site is:

- located upon a principal aquifer (bedrock) and secondary undifferentiated aquifers (superficial deposits).
- A Main river (River Medlock) is located close to the site. It flows through a culverted section through the stretch of river closest to the site.

From current land contamination reporting submission made, the applicant/developer has demonstrated that it will be possible to manage the risks posed to controlled waters by this development. However, further detailed information will be required before built development is commenced. We believe that it would place an unreasonable burden to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority determine.

Any subsequent efforts made to the address the conditional requirements detailed below should be carried out by a competent person(s) in line with paragraph 196 of the NPPF.

Without inclusion of the conditions recommended, the proposed development would, as submitted, potential be contrary to NPPF paragraph 187, because it cannot be sufficiently guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution / contamination.

Cont/d..

Note to LPA/Applicant/Agent – EA Conditional Requirements /Wording

- For those elements of our conditional requirements detailed in *purple italics* below, we are happy to accept alternative final wording provided this does not materially alter the trigger point of our current conditional requirements.

- It is acknowledged that they may exist a likelihood of similar condition requirements being requested by our regulatory counterparts (e.g. MCC's Environmental Health Department), appreciative to the fact there will exist a desire to avoid a duplication of conditional requirements, we ask that whereby there exists and intention to amalgamate condition wording that we are further consulted/sighted on the draft wording.

- As detailed within the latest technical note submission (i) detailed above, further to our conditional wording below (purple italics), we accept that limited demolition works below ground-level / pre-existing slab level may be required to facilitate additional site investigation needs/requirements.

  We would seek to constructively challenge the progression of intrusive demolition/clearance works whereby it cannot be demonstrated that these are necessary/appropriate. In general, we would encourage that pre-existing hard-standing is kept in-situ until remedial works are able to be progressed - given this can provide a level of protection against contamination exposure and mobilisation.

- We ask that we are consulted on any subsequent efforts made by the applicant/agent to discharge or omit the EA conditional requirements detailed below.

Condition [1] – Additional Site Investigation / Remedial Strategy / Remedial Verification Plan

With the exception of above ground demolition works, no development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A site investigation scheme, to provide further information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason [1]

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 187 of the National Planning Policy Framework.

Cont/d..

Condition Note [1]

A scheme for the management and decommissioning of investigative boreholes should be included within the remedial strategy for the proposed development. Associated withi this the applicant is advised to view the *Environment Agency's Good Practice for decommissioning boreholes and wells* and the *(North West Region) Advisory Notes for Well Abandonment Specifications*.

Condition [2] – Remedial Verification Report

Prior to any part of the permitted development being brought into first use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason [2]

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition [3] - Previously Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason [3]

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition Note [3]

Whilst not specifically reference within the proposed wording of condition [3], in the instance that previously unforeseen contamination is identified, for expediency, we would request that the EA is jointly notified/consulted and provided the opportunity to input any revised remedial strategy submitted.

Condition [4] - Infiltration Drainage Control

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters.

Cont/d..

The development shall be carried out in accordance with the approved details.

Reason [4]

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition Note [4]

Current site investigation reporting submitted indicates potential use of soakaways into the aquifer unit are being considered. No drainage systems for the infiltration of surface. The area which has been considered potential feasible for the adoption of soakaways, requires further investigation and assessment with respect to potential groundwater contamination and surface water quality ahead of soakaways into the underlying aquifers being utilised.

In the instance that the applicant/agent formally confirms, in writing, to the LPA/MCC that infiltration drainage will not be utilised as part of this development, then we are happy for consideration to be given the omission of this conditional requirement.

Condition [5] – Piling / Intrusive Foundation Control

Piling or foundations using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason [5]

To ensure that the proposed piling, does not harm groundwater resources in line with paragraph 187 of the National Planning Policy Framework and Position Statement N5 of the 'The Environment Agency's approach to groundwater protection'.

--

Advice to Applicant / Agent - EA General Informatives / Advisories

Further to our conditional requirements detailed above, we would like to take this opportunity to provide the following general informatives/advisories to the applicant/developer.

Waste On-site / Soil Reuse

The CL:AIRE (Contaminated Land: Applications in Real Environments) Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste.

Under the Code of Practice:

- Excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution

Cont/d..

- Treated materials can be transferred between sites as part of a hub and cluster project
- Some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the EA should be contacted for advice at an early stage to avoid any delays.

For further initial guidance on this matter, please refer to:

- The position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on GOV.UK

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear.

If in doubt, the EA should be contacted for advice at an early stage to avoid any delays.

If you receive (or reject) any hazardous waste, you must send a report to the Environment Agency. These are known as ‘returns’. If you dispose of hazardous waste at the premises where it’s produced you may also need to send returns. You should follow the guidance provided here: Hazardous waste: consignee returns guidance

Dewatering

Dewatering is the removal/abstraction of water (predominantly, but not confined to, groundwater) in order to locally lower water levels near the excavation. This can allow operations to take place, such as mining, quarrying, building, engineering works or other operations, whether underground or on the surface.

The dewatering activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests.

This activity was previously exempt from requiring an abstraction licence. Since 1 January 2018, most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site.

Cont/d..

More information on this topic is available on gov.uk: https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-a-licence-for-a-previously-exempt-abstraction.

Infiltration Drainage

Approved Document Part H of the Building Regulations 2010 establishes a hierarchy for surface water disposal and encourages a SuDS approach. The first option for surface water disposal should be the use of SuDS, which encourage infiltration such as soakaways or infiltration trenches. In all cases, it should be established that these options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems.

For example, using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

The control of emissions from from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

--

Cont/d..

Please forward a copy of this letter to the applicant/agent. Should you have any queries or questions regarding this response, then please do not hesitate to get in contact.

Yours sincerely,

[redacted]
EA GMMC Green Growth Team Project Manager & Planning Specialist

[redacted]