

51121/01: Bridge College, Openshaw – Planning Application LPA Comments

Ref.	LPA Comments Received 02.06.25	Civic Earth Responses 09.06.25
1	The Phase 1 report is stated to be a 'Draft for Internal Review' – this status should be updated.	Version P01 of the Phase 1 Desk Study has been issued to the Client.
2	The limited number of ground gas monitoring rounds undertaken (2no.) should be justified with respect to current UK guidance before we can assess the conclusion that no ground gas protection measures are required. Monitoring data from previous reports for the college site may be referred to.	A total of 8 ground gas monitoring rounds have been undertaken at the site; 6 rounds over a 2 month period by Curtins as part of their 2009 investigation, and 2 rounds by Civic Earth in 2025 on a fortnightly basis. Guidance recommends that for a low sensitivity development (commercial) with a low generation potential of ground gases, 6 monitoring rounds over a 2 month period should be carried out. For a moderate generation potential site, 6 rounds over a 3 month period are recommended. The Curtins' monitoring rounds were undertaken between 3 February 2009 and 25 March 2009 during atmospheric pressures ranging between 991mbar and 1016mbar. As summarised in the Civic Earth site investigation report, the Curtins' monitoring rounds did not record methane concentrations above the detection limit, with carbon dioxide concentrations recorded below 5%v/v on each occasion. The Curtins report states that a maximum carbon dioxide concentration of 3.9% v/v with a flow rate of 6.4 l/hr was recorded on 3 February 2009 and a maximum carbon dioxide concentration of 4.0% v/v with a flow rate of 5.0 l/hr was recorded on 13 February 2009. Both readings were recorded within borehole BH3 which is located outside of the existing (and proposed) building footprint. It is noted however that the response zone of borehole BH3 is within the Glacial Till and top of the bedrock, which are not considered to be a ground gas generating stratum with no specific reference to organics on the borehole record. The response zone of the well is noted to extend between 20m and 14m across two strata which can result in artificial flow rates regimes being generated. Review of the Curtins monitoring records indicates that for the two response wells installed within the Made Ground (boreholes BH01 shallow and BH07 shallow, both located outside of existing (and proposed) building footprints), the calculated GSVs typically correlated to CS1. CS2 conditions were recorded in borehole BH07s on the second, third and fourth monitoring rounds but not reflected for the final two rounds which represented CS1. The subsequent GEA 2011 assessment (undertaken post-enabling works at the site, prior to construction of the existing structures) further analysed the Curtins ground gas monitoring results and the trends in depleted oxygen and carbon dioxide concentrations. GEA concluded that the concentrations reduce over time, suggesting that the initial results presented soil gas trapped within the Made Ground below concrete / hardstanding, and that as the site was stripped of hardstanding and turned over, trapped gas would have vented to the atmosphere. GEA noted that borehole BH3 and BH4 did not follow this trend; however, the conceptual site model in these areas of the site (a former clay pit and raised area) did not reflect the CSM across the other areas of the site, and given no buildings were proposed in this area of the site, the risks from ground gases were considered to be low. GEA concluded that there would be no requirement for the installation of ground gas protection measures within the proposed new structures. The results of the Civic Earth ground gas monitoring rounds confirm minimal carbon dioxide concentrations within the Made Ground which correlates with GEA's interpretation that 'trapped' soil gas within the Made Ground was released during the previous earthworks at the site, with concentrations below 1%v/v recorded in each installation on each occasion. For completeness, the monitoring wells installed within both the Made Ground and Devensian Glacial Till Deposits were monitored for ground gas and the concentrations of methane and carbon dioxide were recorded to be below 1% and 5%, respectively in both strata and the calculated GSVs correlate to CS1. A review of the Total Organic Carbon content was also carried out for the deposits of Glacial Till, which confirmed that the natural superficial deposits are considered to have a low potential for ground gas generation. In summary, in consideration of the number of monitoring rounds completed at the site (6 historical rounds over a 2 month period plus 2 recent rounds over a 2 week period) which have indicated consistently low carbon dioxide concentrations of <5%v/v, the low ground gas generation potential of the natural deposits, and the supplementary assessment undertaken by GEA, along with the findings of the recent monitoring undertaken by Civic Earth, it is considered that sufficient ground gas monitoring data is available to assess the ground gas regime at the site and conclude CS1.
3	It is acknowledged that locations and levels of new water supply pipes are to be confirmed, however section 6.7 'Risks to Buried Water Supply Pipes' states that the full suite of UKWIR testing has not been carried out, and bases the conclusion that standard PE pipework would potentially be suitable for use on an initial total soils analysis. It should be clarified whether the full suite of UKWIR testing is to be carried out.	Should the Contractor wish to utilise barrier pipes at the development, then the full UKWIR suite of testing is not considered to be required. However, if the Contractor is looking to utilise standard PE pipework, then the full suite of UKWIR testing will be required on the materials within which the pipework will be placed, to confirm suitability of the PE pipework. If the PE pipework is to be placed within imported, clean backfill e.g. site won/ imported virgin material, UKWIR testing is not considered to be required. This can be outlined within the remediation strategy for the site.
4	The proposed thickness and structure of the clean cover system (450mm including 150mm topsoil, with a geotextile membrane at the base) for soft landscaped areas is accepted, but MCC's guidance should be referenced, including for proposed testing frequencies for cover system materials, which are outstanding.	The frequency of verification testing for the clean cover system would typically be outlined in the site's remediation strategy (as per Point 5 below). We note the MCC's guidance which states that the sampling frequency for the validation of clean cover system soils is 1 per 200m ³ for soft landscaping where imported soils are greenfield soils. This frequency increases to 1 per 150m ³ for imported soils sourced from a brownfield site, an unknown source, or are remediated soils.
5	Notwithstanding point 4 above, a remediation strategy is required to be submitted for approval in order to comply with part a of the above standard condition. Further details regarding requirements can be found in MCC's guidance.	Noted.
6	The conclusions regarding low risks to controlled waters are accepted.	Noted.
	CLAND01* a) Before the development hereby approved commences, a report (the Preliminary Risk Assessment) to identify and evaluate all potential sources and impacts of any ground contamination, groundwater contamination and/or ground gas relevant to the site shall be submitted to and approved in writing by the City Council as local planning authority. The Preliminary Risk	We consider that the wording of the condition can be amended to reflect the documents submitted (Phase 1 Desk Study and Phase 2 Site Investigation Report), subject to the LPA's agreement of the above responses.

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	Assessment shall conform to City Council's current guidance document (Planning Guidance in Relation to Ground Contamination). In the event of the Preliminary Risk Assessment identifying risks which in the written opinion of the Local Planning Authority require further investigation, the development shall not commence until a scheme for the investigation of the site and the identification of remediation measures (the Site Investigation Proposal) has been submitted to and approved in writing by the City Council as local planning authority. The measures for investigating the site identified in the Site Investigation Proposal shall be carried out before development commences and a report prepared outlining what measures, if any, are required to remediate the land (the Site Investigation Report and/or Remediation Strategy) which shall be submitted to and approved in writing by the City Council as local planning authority. b) When the development commences, the development shall be carried out in accordance with the previously agreed Remediation Strategy and prior to occupation a Completion/Verification Report shall be submitted to and approved in writing by the City Council as local planning authority. In the event that ground contamination, groundwater contamination and/or ground gas, not previously identified, are found to be present on the site at any time before the development is occupied, then development shall cease and/or the development shall not be occupied until, a report outlining what measures, if any, are required to remediate the land (the Revised Remediation Strategy) is submitted to and approved in writing by the City Council as local planning authority and the development shall be carried out prior to occupation in accordance with the Revised Remediation Strategy, which shall take precedence over any Remediation Strategy or earlier Revised Remediation Strategy. Reason - To ensure that the presence of or the potential for any contaminated land and/or groundwater is detected and appropriate remedial action is taken in the interests of public safety, pursuant to [INSERT] of the Unitary Development Plan for the City of Manchester.	