



CDN/25/0420, 131708/FO/2021, 87 Rochdale road C7 con land

From Sue Jones <sue.jones@manchester.gov.uk>

Date Thu 05/06/2025 18:03

To Jennifer Atkinson <jennifer.atkinson@manchester.gov.uk>

Hi Jen

I have reviewed the information submitted and we already have received most of the documentation and agreed some of the validation, but there had been confusion over the validation of the clean cover system for the landscaped areas. I have set out what we have previously agreed and what we are outstanding the guidance for the validation.

Previously agreed:

- Gas Protection
- Borehole wells decommissioned
- Asbestos Air Monitoring - testing measured respirable airborne fibre concentrations were below the limit of quantification and no remedial measures were necessary
- Asbestos in soils - Visual evidence found at TP111 and TP113, hand picked removal and validation samples to the side and base of excavations and no asbestos detected.
- Hotspot removal - Contaminated soils were removed and validation samples were taken at the sides and base of the excavations for the below areas
 - BH102 Hydrocarbon
 - BH104 Hydrocarbon
 - TP109 Gas Works waste
 - TP114 Possible Gas Works Waste
 - TP115 Possible Gas works Waste
 - TP113 and TP121 hotspots
- MMP
- Waste Transfer Notes
- Product Datasheet, Protecta-line Pipe

We were outstanding the validation for:

- Installation of an Engineered Cover System within soft landscaping/ garden areas.

They have submitted results of the Top Soil Chemical Testing x1 sample prior to import but this is insufficient to discharge the condition.

As per our guidance [Planning_guidance_relating_to_ground_contamination\(6\).pdf](#), (Section 6 - Cover Systems) and Sections 4.2 of the Remediation Strategy (Watermans) extract below:



4.12 Engineered Cover System for Gardens and Soft Landscaped Areas

An engineered cover system shall be installed below all areas of proposed soft landscaping to prevent dermal contact, ingestion, external inhalation and other potential pathways associated with the Made Ground. The cover system is not required beneath areas of hardstanding such as access roads and building footprints, as the hardstanding will form a barrier to the potential contaminant linkage in these circumstances.

Topsoil / Subsoil

The soils to be used within the cover system shall be comprised of imported topsoil and subsoil. The imported soils shall be certified as suitable for use prior to being imported to the Site (as per Section 4.16) and should be from a known source (preferably natural inert). In addition to meeting set chemical criteria, cover layer materials shall be free from anthropogenic materials such as bricks, wood, concrete, glass, metal and plastic, and no visual or olfactory evidence of contamination should be present. Site-won made ground materials shall not be considered suitable for re-use within the cover layer.

Within soft landscaped areas, the cover layer shall comprise a minimum of 100mm topsoil underlain by 350mm subsoil but will require to take into consideration the type of vegetation proposed at the Site. Where specific vegetation requires deeper soils for growth purposes (i.e. tree pits, etc.), the cover system thickness shall be increased accordingly.

No-Dig Layer

Due to the presence of asbestos and to prevent mixing of the made ground soils within the overlying clean cover soils, a 'no-dig layer' of a minimum of 150mm should be provided at the base of the cover layer. The no-dig-layer shall be comprised of crushed materials (either imported or Site-won) and should be certified as suitable for use. It should be ensured that Site-won crushed materials are suitably handled and segregated to prevent cross contamination with made ground soils and to ensure they remain chemically 'clean' and free from asbestos fibres. In addition, a marker layer (e.g. brightly coloured mesh or geotextile) shall be provided between the cover layer soils and the underlying no-dig layer.

Verification of Cover System

Photographic evidence shall be collected from areas of soft landscaping confirming the presence and correct thickness of imported topsoil/ subsoil and the presence of the underlying marker layer and no-dig layer. Photographs will comprise a staff or tape measure placed vertically against the soil profile to show a minimum of 300mm soil has been placed above the no-dig layer.

Inspection pits should be excavated within areas of soft landscaping for verification purposes. This should be undertaken on the basis of 1 pit per 250m² of soft landscaping, with a minimum of 3 No. inspection pits.

Validation Chemical Testing

Topsoil and subsoil shall be certified as suitable for use prior to being imported to the Site and should be from a known source (preferably natural inert). Source sampling (if from a greenfield source) should be carried out at a rate of one sample per 200m³ or a minimum of three samples of soil per source, whichever is greater. If from a brownfield source, sampling should be at a rate of one sample per 50m³ or a minimum of six samples of soil per source, whichever is greater.

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We still require:

- Topsoil/subsoil sampling at source : greenfield source - 1 per every 200m³, brownfield - 1 per 150m³, so we need the volume of the imported and the soil source to confirm acceptability*
- Depth validation and geotextile marker: photographic evidence showing 100mm topsoil, 350mm subsoil (include a scale/ruler) and evidence of geotextile marker (normally taken before the soil is put on top or partially covered). For vegetation with deeper roots the depth should

show (900mm for trees, and 600mm for shrubs). Looking at the landscaping plan we would be looking at about 6 areas to validated from a range across the landscaping.

*MCC sampling requirement is less than Waterman's proposal.

Kind regards

Sue

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