

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

Our ref: SO/2023/123520/01-L01
Your ref: 137841/FO/2023
Date: 24 October 2023

Dear Michael Pearson,

ERECTION OF 5 STOREY BUILDING TO FORM 52 RESIDENTIAL APARTMENTS (USE CLASS C3A), WITH ASSOCIATED CAR AND CYCLE PARKING PROVISION, HARD AND SOFT LANDSCAPING, BOUNDARY TREATMENT, ACCESS, SERVICING, AND OTHER ASSOCIATED WORKS.

LAND AT DOWNLEY DRIVE MANCHESTER M4 6BW.

Thank you for consulting us on the above application, on 11th September 2023.

We have reviewed the following reports with respect to risk to controlled waters and have the following comments:

- Phase 1 Preliminary Risk Assessment, Downley Drive, Manchester, Carley Daines and Partners Ltd, no date or report reference given.
- Phase 2 Geo-Environmental Investigation and Assessment, Downley Drive Manchester, M4 7JU, Ref: 19-B-12490/Downley Drive, Rev 0, Carley Daines and Partners Ltd, 25th January 2021.
- Phase 3 Remediation Statement, Downley Drive, Manchester, M4 7JU, Ref: 19-B-12490/Downley Drive, Rev 0, Carley Daines and Partners Ltd, 9th March 2021.

The site is located on drift geology of glacial till comprising clay, silt and sand, which is classified as a Secondary Undifferentiated aquifer. The bedrock is Collyhurst Sandstone which is classified as Principal aquifer. The Rochdale Canal is located adjacent to the northern site boundary. The canal is a Water Framework Directive Waterbody, ID GB71210517 and is designated as a Site of Biological Importance and a Local Wildlife Site.

In this site setting the canal and Principal aquifer are considered to be controlled waters receptors.

The site history includes steelworks, wire works, and housing on site which have been demolished with saw mill and other industrial land uses adjacent to the site which have now been demolished and redeveloped as housing. The past industrial land use indicates that contamination may be present on site.

Environment Agency position

We object to this development because the information submitted with the application

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Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
Customer services line: 03708 506 506
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does not demonstrate that the risk of pollution to controlled waters is acceptable/can be appropriately managed. We therefore recommend that planning permission is refused.

Reason(s)

The previous use of the proposed development site as steel works and wire works presents 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 development site is:

- located upon a principal aquifer.
- adjacent to the Rochdale Canal WFD Waterbody, Site of Biological Importance and Local Wildlife Site.

The application's supporting documentation does not demonstrate that the risks of pollution have been understood or provide adequate mitigation for these risks. In particular:

- The desk study does not identify that the site is located upon Principal aquifer and the conceptual site model does not identify the Rochdale canal or the Collyhurst Sandstone Principal aquifer as potential receptors.
- The site investigation analytical suite has not been demonstrated to include all contaminants of concern associated with the past industrial land uses.
- The site investigation report shows that all soil samples exceeded recommended holding times prior to receipt at the laboratory and sample deviations were also recorded for incorrect sample pots for all organic analyses, therefore the soil data is not considered to be reliable.
- Shallow groundwater was encountered during the site investigation works, however no groundwater analysis was carried out.
- The remediation statement has been based upon the desk study and site investigation which have been found to be unsatisfactory and therefore the remediation statement is not acceptable in its current version.

This planning application has therefore failed to meet the requirements of paragraphs 174 and 183 of the National Planning Policy Framework.

Overcoming our objection

The applicant should provide information to demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This information should address the above points.

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Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

Miss India Blythin

Planning Advisor

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