

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

Our ref: SO/2024/124001/01-L01
Your ref: CDN/24/0091
Date: 05 April 2024

Dear Michael Pearson,

**DISCHARGE OF CONDITION 13 (GROUND CONDITIONS) ATTACHED TO
APPLICATION REF NO 132780/JO/2022 (APPROVED PLANS VARIATION OF
PLANNING PERMISSION 132780/JO/2022)**

**FORMER WORKSHOP, ARKADY INDUSTRIAL ESTATE BRISCOE LANE
MANCHESTER M40 2XG**

Thank you for consulting the Environment Agency (EA) on the above discharge of condition application, received on 28th February 2024.

We have reviewed the following documentation submitted in support of CDN/24/0091 for the discharge of condition 13 (Ground Conditions) attached to planning permission 132780/JO/2022:

- Remediation Strategy. Prepared by Sub Surface. Report No. 6921L. Date: January 2024.
- Desk Study with Walkover Survey. Prepared by Sub Surface. Report No. 6921. Date: March 2020. (Received via email from Manchester City Council (MCC) on 18th March 2024)
- Geological and Mining Appraisal. Prepared by Sub Surface. Report No. 6921A. Date: April 2020. (Received via email from Manchester City Council (MCC) on 18th March 2024)
- Ground Investigation Report. Prepared by Sub Surface. Report No. 6921F. Date: October 2021. (Received via email from Manchester City Council (MCC) on 18th March 2024)
- Ground Investigation Report. Prepared by Sub Surface. Report No. 6921C. Date: October 2021. (Received via email from MCC on 18th March 2024)
- PFAS Risk Assessment Report. Prepared by Sub Surface. Report No. 6921H. Date: October 2022. (Received via email from MCC on 18th March 2024)
- Supplementary PFAS Investigation Report. Prepared by Sub Surface. Report No. 6921K. Date: October 2023. (Received via email from MCC on 18th March 2024)

Environment Agency Position – Condition 13 (Ground Conditions)

The EA has reviewed the above listed reports and **we are unable to recommend the discharge of condition 13 (Ground Conditions) attached to 132780/JO/2022 at this**

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time.

We have reviewed the submission to understand the risks to 'controlled waters' and the process by which that risk is either mitigated or removed. To confirm, the EA is satisfied sufficient information has been presented to address the Preliminary Risk Assessment and Site Investigation elements of condition 13 (Ground Conditions).

We have engaged with the applicant and their environmental consultants under the EA's pre-application chargeable advice service where we have discussed the approach to addressing the residual PFAS contamination issues identified on site. Having reviewed the Remediation Strategy (dated January 2024), we are, in principal, in agreement with the general approach proposed (i.e. implementation of a barrier on the development site). However, we note since our previous discussions, there has been a deviation from the proposed activities / details from our previous understanding.

In addition to requiring clarifications on the proposed remediation details since our previous discussions, there are concerns the proposed post-treatment monitoring strategy is inadequate in the context of ensuring the future effectual discharge of condition 14 (Verification Reporting) attached to 132780/JO/2022. The verification plan, including monitoring, and validation criteria needs to be designed to demonstrate the success of the remedial approach intended to be implemented. Therefore, based on the information presented at this time, it is unlikely the proposals as submitted will ensure condition 14 can be addressed satisfactorily.

In line with the above context, we request a revision to the Remediation Strategy is submitted to address the following points:

1. From the EA's involvement in the remediation of PFAS contaminated groundwaters we understand that the applicant's specialist contractor has two appropriate propriety products ('PlumeStop' and 'SourceStop'). It is our understanding that 'PlumeStop' would likely be the most appropriate technology for a barrier feature at this development site rather than the 'SourceStop' approach which is more appropriate for source treatment. Please provide further clarity on the appropriateness of 'SourceStop', rather than 'PlumeStop', in this circumstance.
2. The proposed barrier is currently located around the perimeter of the site. We note that the proposed monitoring boreholes (post-treatment) are located inside of the barrier. This is unlikely to provide a meaningful validation and verification position for the success of the barrier installation as the results from the monitoring boreholes will likely continue to monitor the known and existing plume. Therefore, the EA would unlikely be in a position to support the future discharge of condition 14 (Verification Report) on this basis. We request clarity as to why the monitoring boreholes are not located on the outside of the barrier (as per a standard approach to in-situ reactive (sequestering) barrier) technology.
3. We recognise the tight constraints of the site is such that there may not be sufficient room for monitoring wells to be located on the outside of the barrier feature as currently proposed in its location. To ensure an effectual monitoring strategy can be implemented for the purposes of the subsequent verification works and as a pragmatic approach to address point (2) above, we request the applicant considers whether the barrier can be implemented slightly off-site into the building footprint. This will allow for monitoring wells to be accommodated on the outside of the barrier, especially on the down hydrogeological gradient side of

the development site.

4. With the location of the wells within the building footprint (either inside or outside of the barrier feature as in points 2 and 3 above) we request clarity on the mechanism in place for the monitoring programme that is suggested to be implemented after the completion of the installation. We note it is likely that the final floor to the building will be laid and, therefore, will prohibit or make access difficult to the proposed monitoring wells.
5. We request further narrative is provided on the verification and validation criteria that will be used to show success of the process and sequestering of the PFAS contamination identified.

We would welcome the submission of a revised Remediation Strategy which addresses the points highlighted above and an opportunity to revisit our position on CDN/24/0091 once received.

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Should you have any queries on the contents of this letter, then please do not hesitate to contact me.

Yours faithfully

Ms Anne-Marie McLaughlin
Planning Advisor

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