



Our Ref: 1932YOU_DIS_It01

Your Ref:

24th October 2023

Keiron Moore
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Dear Keiron

RE: Former Jacksons Brickworks, Ten Acres Lane – Condition 5 of 129197/FO/2021

Please find the enclosed documents for submission to Manchester City Council Planning to satisfy Condition 5 of the planning permission for the site remediation works at the Former Jackson's Brickworks, Ten Acres Lane (application number 129197/FO/2021).

The enclosed documents to satisfy this condition are:

- Wardell Armstrong. Combined Phase I and Phase II Ground Investigation Report. May 2021. Version 1.1
- Wardell Armstrong. Updated Combined Phase I and Phase II Ground Investigation Report. October 2022. Version 1.0
- Wardell Armstrong. Technical Note. Deeper Ground Conditions and Laboratory Testing Clarifications. April 2023
- Wardell Armstrong. Technical Note. Hydrogeological Conceptual Site Model Clarifications. March 2023

The documents listed above provide a conceptual site model (CSM) and identify all contaminant sources, pathways and receptors (both on-site and off-site). Through pre-application consultation with the Environment Agency, it has been acknowledged by all parties that there remains some uncertainty in aspects of the CSM relating to the source term characterisation (characterisation of deeper Made Ground) and off-site contaminant migration within the superficial geology. This residual uncertainty is not unexpected given the limitations of intrusive site investigations at complex sites such as this.

In pre-application advice from the Environment Agency (EA Ref: SO/2020/120757/06-L01 dated 26th May 2023, which is also enclosed with this letter), it was recognised that further pre-remediation site investigation to attempt to address the residual uncertainties "may still not offer the ability to draw definitive conclusions about the risks posed by contamination given the heterogeneity of the site materials". In view of this, it was agreed that a more "dynamic approach" to remediation would be a better solution for addressing residual uncertainty in the CSM, whereby outstanding information

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gaps are addressed by site investigation during the remediation works when access to materials at greater depths within the Made Ground is more practical and better quality information about their chemical and physical composition can be obtained.

To that end, through pre-application discussions, a verbal agreement in Spring 2023 was made with the Environment Agency to set out the scope and detail of this dynamic approach to remediation of the Site within the remediation strategy (to be submitted under Condition 7 of 129197/FO/2021). We understand that this commitment to the dynamic approach to remediation enables Conditions 5, 6, 7 and 8 of Planning Permission 129197/FO/2021 to be addressed based on existing site investigation information already available within the enclosed reports prepared by Wardell Armstrong. However, for avoidance of doubt, Condition 6 (detailed assessment of risk), Condition 7 (remediation strategy) and Condition 8 (ground stabilisation works plan) shall be addressed by new documentation prepared by VertaseFLI using the existing information.

Condition 9 of Planning Permission 129197/FO/2021 requires submission of a verification report demonstrating the completion and effectiveness of works set out in the approved remediation strategy (Condition 7) and ground stabilisation strategy (Condition 8). This verification report shall include the results of the additional site investigation obtained during implementation of the dynamic remediation strategy to confirm that risks posed by contamination to sensitive receptors have been managed. This Condition provides a backstop for consultees to satisfy themselves, based on the information provided, that the requirements of the National Planning Policy Framework (NPPF) have been met with respect to land contamination.

I trust that this explanation is sufficiently clear and that the documents submitted to satisfy Condition 5 can be considered in this context. Please do not hesitate to get in touch if further clarification is required.

Yours sincerely

For and on behalf of VertaseFLI Limited



Duncan Scott

Technical Director

Enclosed:

- *Environment Agency Letter dated 26th May 2023 Ref: SO/2020/120757/06-L01*

- *Wardell Armstrong. Combined Phase I and Phase II Ground Investigation Report. May 2021. Version 1.1*
- *Wardell Armstrong. Updated Combined Phase I and Phase II Ground Investigation Report. October 2022. Version 1.0*
- *Wardell Armstrong. Technical Note. Deeper Ground Conditions and Laboratory Testing Clarifications. April 2023*
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