Ref: 12-123-L9-1
Date: 8th October 2025

Rebecca Twigg
Manchester City Council
Environmental Protection Section
Environmental Health
Hammerstone Road Depot
Gorton
Manchester
M18 8EQ

BY Email

Dear Rebecca,

RESPONSE TO COMMENTS
BELLE VUE

We have reviewed your comments dated 25th and 30th June 2025, and a response is provided below.

The approved E3P Remediation & Enabling Works Strategy (ref. 12-123-R2 Rev 4, dated June 2021) included the following remedial action for the initial / enabling phase of works within TABLE 3.1 ENABLING WORKS SCHEDULE:

RE-8: Delineation, Excavation, Treatment & Disposal of Volatile Impacted Material:
- *Elevated concentrations of semi-volatile / soluble hydrocarbon compounds and naphthalene have been identified in TP106, TP215 (0.70 m) and TP303 (0.30 m) and will need to be excavated and delineated to remove the source material is removed, to ensure that there is no unacceptable risk to human health.*
- *Elevated concentrations of non-volatile TPH has been identified within TP215, TP309. Impacted material should be removed at each location, where these soils may be chemically validated to assess chemical suitability for retention on site in an area of no future sensitivity.*
- *Elevated total mercury was identified during supplementary investigation carried out in November 2020 at TP215 (0.70 m bgl). During remediation, speciated mercury analysis should be completed to assess whether elemental mercury is present which may pose a risk to future site users through vapour inhalation. If elemental mercury is identified, it may be necessary to delineate and excavate the soils as a hotspot and place in an area of low sensitivity such as POS. Alternatively, if it is proven that there is no elemental mercury, a clean cover system will be sufficient.*

Please can a report with the results of this delineation exercise and validation testing be provided for consideration. The Validation Completion Report states: "Due to further testing on site highlighting exceedances of naphthalene and other SVOCs, specialist vapour resistant membranes were required within Apartment Block 2 (Plots 62-85), Plots 86-98 and 204-214, as shown on Drawing 12-123-011 (Appendix III)." It therefore appears that further testing was undertaken but the results/report for this do not appear to form part of the submitted documentation.

The hotspot delineation works are detailed within the E3P Remediation Validation Report (Ref: 12-123-R5-2, dated August 2022).

The heavy end TPH C16-C35 recorded in TP309 was mitigated by the placement of the clean cover system, which will break the pathway associated with soil ingestion.

As per their email of 25th June, there appears to be a gap in information as to how the decision was arrived at that HC vapour resistant membranes were required within the plots listed in the Validation Completion Report (VR): Apartment Block 2, and Dwelling Plots 86-98 and 204-214.

Please refer to the following E3P reports:

- Supplementary Site Investigation (Ref: 12-123-L5-Rev 1, dated 22nd April 2021)
- Supplementary Site Investigation (Ref: 12-123-L6, dated 7th October 2021)
- Human Health Assessment Addendum (Ref: 12-123-L8, dated 3rd May 2022)
- Remediation Validation Report – RE-8 (Ref: 12-123-R5-2, dated August 2022)

Plot 214 is not marked on the drawing referenced within the VR as requiring a vapour membrane although the gas validation certificate states that one was installed.

Apologies, it appears as though plot 214 was not highlighted on the drawings. However, the reports listed above confirm that plot 214 requires a vapour membrane. The Visqueen Ultimate HC Blok has been installed in plot 214.

The gas membrane validation certificates for Apartment Block 2, and Stairwell for Apartment Block 2 (certificate titled 'Block 1 x 2 Stairwell'), does not confirm that a vapour membrane was installed.

Apologies, the text in the validation certificate for Apartment Block 2 previously stated that the Visqueen Low Permeability Membrane was installed, therefore the text has been updated to confirm that the Visqueen HC Blok (Gold Membrane) was installed. The photographs and check sheet also confirm that the Visqueen HC Blok was installed.

The certificate titled 'Block 1 x 2 Stairwells' refers to Apartment Block 1 which did not require a vapour membrane.

They cannot see the gas membrane validation certificates for the following plots :

- *106-107*
- *130-133*
- *136-139*
- *141-149*
- *169*
- *171-172*
- *188-190*
- *220-222*

The E3P Validation Completion Report (Ref: 12-123-R6-2, dated May 2025) notes the following:

Due to unforeseen circumstances, E3P did not attend site to validate the gas membrane within plots 106, 107, 169, 188, 244 and 245; representing six plots out of 233 plots requiring gas mitigation. The site manager and groundworker confirmed that the gas membrane was installed to a good standard of workmanship. Given all adjacent plots have been validated, E3P can be confident that the gas membrane has been installed to a good standard.

Validation certificates have been issued for plots 130-133, 136-139, 141-149, 171-172, 189-190 and 220-222.

On review of the validation certificate for plot 168, this has been updated to include plot 169, given the photographs confirm that the gas membrane has been installed across both semi-detached plots.

They also seem to be missing the cover system validation for the following plots:

- *148-149 (VR - Table 2.1 Summary of Garden Validations: lists the relevant report as dated 25th August 2022, Ref. V8)*

The Garden Validation Letter (V8) includes plots 148-149 and this will be submitted.

I trust the information provided in this letter report is satisfactory, however if there is anything further, please do not hesitate to contact me.

Yours sincerely,
For and on behalf of E3P Ltd

Nicola Sellars
Technical Principal Specialist