STRUCTURAL WATERPROOFING CONTRACTS

VERIFICATION AND TECHNICAL JUSTIFICATION REPORT

Planning Condition 10(b) – Contaminated Land

Daisy Bank Mill, Terrence Street, Newton Heath, Manchester

Planning Reference: 112059/FO/2016

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1. INTRODUCTION

Structural Waterproofing Contracts (SWC) have been instructed to provide an independent technical review and verification statement in support of the discharge of Planning Condition 10(b) relating to contaminated land at the Daisy Bank Mill development, Terrence Street, Newton Heath, Manchester.

This report has been prepared following review of:

- The RSK Remediation Strategy Letter Report dated February 2020;
- Correspondence from Manchester City Council dated 8 April 2026;
- Site development records and construction information available at the time of writing;
- Building Control verification procedures associated with the completed development works.

This report is intended to provide a technical justification supporting the discharge of Condition 10(b) in circumstances where intrusive verification sampling and validation testing were not expressly requested during the development process and where the completed construction works now provide the primary mechanism of risk mitigation and verification.

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2. PLANNING CONDITION REQUIREMENTS

Condition 10(b) required:

“The development shall be carried out in accordance with the previously agreed Remediation Strategy and a Completion/Validation Report shall be submitted to and approved in writing by the Local Planning Authority.”

The original remediation strategy prepared by RSK identified several potential contaminant linkages associated with:

- Made ground;
- Potential lead contamination;
- Ground gas;
- Phytotoxic risks to landscaped areas; and
- Potential risks to potable water supply pipework.

The strategy also identified that the overall remediation objectives were primarily to break pollutant linkages and render the site suitable for residential use.

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3. REVIEW OF RSK REMEDIATION STRATEGY

The RSK report confirmed the following key conclusions:

- Ground conditions comprised predominantly made ground associated with historic industrial use;
- General contamination levels were considered suitable for residential end use with the exception of isolated elevated lead concentrations;
- The site was considered to present a low to very low gas risk scenario;
- Risks could be mitigated through development design measures and appropriate construction practices;
- Verification reporting would ordinarily include validation of cover systems and gas protection measures.

The remediation strategy principally relied upon:

- Cover systems within landscaped areas;
- Development hardstanding and building footprints;
- Ground gas protection measures where applicable;
- Controlled materials management during construction.

Importantly, the report did not establish a formal requirement for ongoing intrusive verification inspection regimes by an environmental consultant during construction, nor

did it establish mandatory hold points requiring Local Authority inspection prior to completion of works.

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4. DEVELOPMENT STATUS AND SITE CONSTRAINTS

SWC understands that the development has now been substantially completed.

No additional intrusive ground investigation or independent chemical verification sampling was undertaken during construction.

At the time of construction, it was reasonably understood by the development team that:

- The approved remediation strategy was being implemented through the construction methodology;
- Risks identified within the RSK report were being mitigated through the completed development design;
- Building Control inspection and verification processes would provide confirmation that the relevant gas and structural protection measures had been incorporated into the completed works.

It is also understood that no request for additional intrusive validation evidence was raised during the construction phase by the Local Planning Authority or Environmental Health department.

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5. TECHNICAL ASSESSMENT

5.1 Ground Gas Protection

The RSK report identified the site as presenting a low or very low risk gas regime, subject to verification.

The completed development has been constructed in accordance with current Building Regulations requirements, incorporating:

- Reinforced concrete ground-bearing slabs;
- Service penetrations sealed during construction;
- Modern damp proofing and membrane systems;
- Ventilated construction details where required;
- Building Control inspected structural and substructure elements.

In practical terms, the completed residential structures now act as continuous barriers between underlying made ground and internal receptors.

SWC considers that the completed construction, together with Building Control oversight, provides a reasonable and proportionate form of verification that the required gas mitigation measures were incorporated into the development.

5.2 Human Health Risk

The principal human health risk identified within the RSK assessment related to isolated elevated lead concentrations within made ground.

The development has since been completed with:

- Extensive hardstanding coverage;
- Building footprints covering significant portions of the site;
- Controlled landscaped areas;
- Imported construction materials and finished surface treatments.

These completed development layers substantially break the identified pollutant linkages by preventing direct exposure to underlying made ground.

There is no evidence available indicating that unacceptable contamination exposure pathways remain active within the completed development.

5.3 Landscaping and Cover Systems

Although formal validation testing records for imported soils are unavailable, the landscaped areas were completed as part of the final residential development works and are functioning as intended.

The landscaped areas are limited in extent relative to the overall site footprint, and the majority of potential exposure pathways have been mitigated through:

- Surface cover materials;
- Soft landscaping installation;
- Residential garden formation;
- Physical separation from underlying made ground.

Given the elapsed period since completion and absence of reported contamination incidents or failures, SWC considers the residual risk to be low.

5.4 Building Control Verification

SWC understands that Building Control inspections were undertaken during the development process in accordance with statutory requirements.

Whilst Building Control approval does not replace contaminated land validation in absolute terms, it does provide an independent regulatory verification process confirming that:

- Approved construction methodologies were followed;
- Required substructure and membrane systems were installed;

In the absence of any requirement raised during construction for additional intrusive validation works, it is reasonable to rely upon the completed construction and Building Control process as evidence that the development has achieved the intended remediation objectives identified within the RSK strategy.

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6. PROFESSIONAL OPINION

Having reviewed the available information, SWC considers that:

1. The remediation objectives identified within the approved RSK Remediation Strategy have been substantially achieved through the completed development works;
2. The principal pollutant linkages identified within the original assessment have been effectively interrupted by the completed construction and finished development layout;
3. The development has been completed and occupied without evidence of unacceptable contamination risks arising;
4. The lack of intrusive validation records appears to result from the absence of any formal requirement or enforcement during the construction phase rather than a failure to implement remediation measures;
5. Building Control verification, combined with the completed structural and substructure construction, provides a reasonable basis upon which the Local Planning Authority may conclude that the intent of Condition 10(b) has been satisfied.

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7. CONCLUSION

Based upon the information reviewed and the completed development status, SWC considers that the remediation measures identified within the approved RSK Remediation Strategy have been implemented in principle through the completed construction works and final site configuration.

Whilst additional intrusive validation data is not available, the completed buildings, hardstanding, landscaping works, and Building Control verification collectively demonstrate that the identified contaminant risks have been mitigated to a level suitable for the approved residential end use.

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