KELLEN HOMES

Sue Wills
Planning and Regeneration
Town Hall Extension
Mount Street
Manchester

21st May, 2026

Delivered via Planning Portal
RefPP-14948276

Dear Sue,

Re: Mount Road Condition 15c (Phases 1 & 2)

The intention of this covering note is to provide you and the relevant officers an overview of our submission for condition 15c in relation to our development at Mount Road. A previous application was submitted under application ref: CDN/26/0286. This application has been withdrawn as it sought discharge in relation to phase 1, not phases 1 and 2.

The following information has been submitted to accompany this application for discharge:

- 18-062- V5- Garden Validation Letter Plots 36, 40, 44, 48 - Dec 2025
- 18-062- V6- Garden Validation Letter Plots 52, 56, 59 - Dec 2025
- 18-062- V7- Garden Validation Letter Plots 64, 68, 71, 188, 190, 194, 258, 262, 266 - Dec 2025
- 18-062-V1-2 - Garden Validation Letter Plots 92-101 - Jan 2026
- 18-062-V3-2 - Garden Validation Letter Plots 4, 8, 12, 16, 20, 24, 28 and 32 - Jan 2026
- 18-062-V4-2 - Garden Validation Letter Plots 76, 80, 82, 84, 88, 178, 182 - Jan 2026
- 18-062-V8-2 - Garden Validation Letter Plots 218, 222, 254
- 18-062-V9 - Garden Validation Letter Plots 198, 202, 226, 229, 235, 238
- 18-062-V10 - Garden Validation Letter Plots 158,162, 206, 210, 214, 234
- 18-062-V11 - Garden Validation Letter Plot 246-249 - May 2026
- 18-062-V22 - Garden Validation Letter Plots 104, 105 and 109 - July 2025

The above information covers Garden Validations for plots that are located in both phases 1 and 2. These have been done at the frequency agreed in the Brownfield Solutions Remediation Strategy Report Ref: NA/C5150/11739 Rev F. This report has been updated to reflect the 1 in 100m^3 testing requirement following discussions with the Environmental Health team at Manchester City Council. In addition to the above, we also acknowledge that officers previously raised comments on the now withdrawn application. For completeness and to prevent the same comments being raised again the following response has been formulated.

1. **Some of the plot validations state that the entire cover system consists of 600mm topsoil. The approved RS was for 150mm topsoil and 450mm subsoil**

This relates solely to the initial visit covering Plots 92–101 (E3P Letter 18-062-V1-2 dated January 2026). All subsequent visits have recorded individual topsoil and subsoil thicknesses, with

adequate clean capping confirmed across all plots inspected to date. For Plots 92–101, validation of cover depth was undertaken on 2nd July 2025 during a regional heatwave with drought-like conditions. Owing to the sustained high temperatures, soils were naturally desiccated and exhibited similar colouration, preventing reliable differentiation between topsoil and subsoil horizons in situ. In this instance, and given that the primary objective of the clean capping layer is to provide a chemically suitable barrier between potentially impacted underlying soils and future site users, E3P verified overall cover thickness (>600 mm) rather than risk inaccurately recording individual layer thicknesses.

It should also be noted that, prior to E3P's attendance, sampling of imported topsoil and site-won subsoil had been undertaken by Brownfield Solutions. As both materials were stockpiled on site before and during the validation works, it is considered highly likely that both subsoil and topsoil were utilised within the capping build-up.

2. **For some of the plots, particularly those where it's stated that the entire cover system consists of 600mm topsoil, the material is clearly the same throughout the depth of the hand pit and appears to be subsoil rather than topsoil from the photos and low soil organic matter in the majority of analytical results. This material does not appear suitable for use as topsoil.**

Again, this relates solely to the initial visit covering Plots 92–101 (E3P Letter 18-062 V1-2 dated January 2026).

Visual appearance of soils following an extended period of dry weather does not provide a reliable indication of material suitability. Chemical testing undertaken by Brownfield Solutions recorded total organic carbon (TOC) concentrations within topsoil ranging between 2.2–3%, consistent with a moderate organic carbon classification, with occasional samples exceeding 3% and therefore falling within the high organic carbon range. No topsoil samples returned TOC values below 1.5%, indicating an absence of low organic carbon materials.

Subsoil TOC concentrations are typically lower than those observed within topsoil (subsoils are generally accepted to range between approximately 0.1–2%). Laboratory testing of site subsoils recorded TOC values between 1.3–2%. These results demonstrate the presence of two distinct soil types on site, as reflected by the TOC distributions, and indicate that the majority of subsoils fall within the moderate TOC classification (1.5–3%).

3. **Regarding the re-use of site-won subsoil, all reports state that "Brownfield Solutions have been appointed to sample and chemically validate stockpiled site-won subsoil. To date, 42 samples of site-won subsoil have been analysed from four stockpiles of site-won subsoil (1, 25, 3 and 4)." As per CDN/24/0915, the following information is required for this material:**

   a. Confirmation of suitability as growing medium.

   b. Chemical suitability sampling rate of minimum 1 sample per 100m^3

a) Table below included within all garden validation letters confirms that each of the testing (sources and samples listed) PASS – this means they are chemically suitable for use within the cover systems.

CHEMICAL ANALYSIS

TOPSOIL/SUBSOIL	SOURCE	LAB REFERENCE	SAMPLE REFERENCE	PASS/FAIL
Topsoil	The Finches, Halewood	25-033247	TS301 - TS302	Pass
Topsoil	The Finches, Halewood	25-034568	TS401 - TS402	Pass
Topsoil	The Finches, Halewood	25-034403	TS501 - TS510 and TS601 – TS610	Pass
Subsoil	Site Won	25-008354	CS01 – CS09	Pass
Subsoil	Site Won	25-001881	CS2501 – CS2520	Pass

b) There are currently 42 site soil samples covering 4,200m^3 and an additional 3 greenfield samples covering 600m^3 (4,800m^3 total with import ongoing for final plots). Once site works are completed and all soils have been imported to site there will be a completion report that will include all of the garden validations along with confirmation that everything has been done in accordance with the remediation strategy. Chemical testing has been done at the agreed frequency and this is addressed in section 5.3 of the remediation strategy.

If any further information is required in relation to condition 15c, please inform Kellen at your earliest convenience and we will address the comments raised by officers.

Kind Regards,

George Ruffley

Land and Planning Assistant

[redacted]