Crossfield
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Our Ref: RAH/rah/CCL03767.014a

03 June 2026

Mr Carl Tunnicliffe
Churchill Living Limited
Churchill House
The Courtyard
Buntsford Gate
Bromsgrove
Worcestershire
B60 3DJ

Dear Carl,

Wren House, 108 Palatine Road, Manchester, M20 3ZA

Further to our recent correspondence, we respond in bold below to the MCC Environmental Health comments on our Supplementary Ground Investigation report dated May 2024 reference CCL03767.CU49 which was submitted as part of this application.

The report has said that "*arsenic, TPH fraction C8-C10, and certain PAH concentrations have been recorded above the assessment criteria*". Section 7.3.1.1 states that, "*it is understood that residents will not be permitted to dig or cultivate the managed soft landscaped areas*" and section 7.4 states that "*it is evident that there are no valid contaminant linkages such that remediation works should not be necessary for the proposed development*".

The three statements above are a concern to the Council and do not provide reasonable grounds not to use a clean cover system on the basis that residents would not be allowed to dig or cultivate the land, particularly when the submitted information states that there are various substances above the assessment criteria. The Soiltechnics report submitted alongside the planning application recommended a clean cover system.

The "assessment criteria" referenced in the two paragraphs above relates to the Generic Assessment Criteria (GAC) as explained in the paragraph the sentence has been taken from. The Churchill Living development apartments requires at least one resident to be aged 60 or over, with a partner or co-resident allowed to be aged 55 or over. As explained in Section 7.3.1.1 of our report:

The GAC values are conservative with respect to the proposed development as they consider young children as the critical receptor. Such a receptor is not applicable to this development as the long-term receptor will be people of retirement age. On this basis, a site-specific risk assessment (SSAC), using the Contaminated Land Exposure Assessment (CLEA) Model (version 1.071), has been undertaken with respect to the elevated concentration of substances. Based on the proposed end use, the CLEA model has been assessed using dust-related oral, dermal and inhalation pathways for residents of retirement age. The full CLEA results and parameters used are presented in Appendix III.

With respect to the relevant exposure pathways, the maximum recorded concentration of arsenic, TPH fraction C_8-C_{10}, benzo(b)fluoranthene, benzo(a)pyrene and dibenzo(ah)anthracene are below the SSAC for the proposed development. On this basis, a contaminant linkage is indicated not to be present for the proposed residential development.

Hence, there is no requirement for a capping layer in managed soft landscaping areas.

The Soiltechnics report, dated October 2022, makes no reference to the restriction on resident age and possibly where residents were permitted to dig or cultivate the land. It is also noted that the proposed development plan presented on Drawing No. 03 within the Soiltechnics report shows houses with private gardens. On this basis, the Soiltechnics recommendation for a capping layer in gardens/soft landscaping areas is effectively superseded.

The Crossfield report has stated *" the site has not been associated with past fuel and / or chemical storage and there are no such storage facilities in close proximity."* However, excessive Mineral Oil was detected at 0.7M at point TP105 in the previous ground investigation. Crossfield have followed on to state *"conventional plastic materials can be used for the potable water supply without any requirements for specific testing"*, whereas the Soiltechnics report recommended the applicant consult United Utilities to gain their advice as to whether barrier pipes will be needed or not due to the hydrocarbon contamination at the site.

The developer, Churchill Living, has confirmed that barrier pipes will be used for potable water supply

The Crossfield report has said the site is currently devoid of topsoil so will need imported soil for landscaping areas, such activity could provide a clean cover layer for the site, which would help to break the contaminant linkage, and would be a feasible remediation strategy for the site. MCC EH would need full details of this scheme to show it complies with the MCC recommended cover system depths and testing regime.

As outlined above, there is no requirement for a capping layer in managed soft landscaping areas. Whilst there will be a requirement to import topsoil/subsoil to conform with the soft landscaping proposals, this does not require to be a formal capping layer, with the associated costs and programme implications associated with provision of a Remediation Strategy, on-site verification of capping thicknesses and provision of a Remediation Verification Report. Notwithstanding this and in accordance with MCC guidance, imported topsoil/subsoil brought to site for landscaped areas will need to be validated to demonstrated that the soil is free from contamination. Minimum sampling and testing would consist of at least three samples for each source used. One sample for every 200m³ from proven 'greenfield' sources and one sample every 150m³ from 'unknown', 'mixed' or 'brownfield' sources (for soft landscaping). A watching brief for unexpected contamination is also recommended.

We would recommend that these comments are forwarded to the planners and trust this is sufficient for MCC Environmental Health to be able to recommend discharge of the relevant condition.

Yours sincerely,

[redacted]

Robert Hodges
Managing Director

SILC SPECIALIST IN LAND CONDITION Robert Hodges Reg. No. 1695

SQP Number: SQP0104