

Ref: 14-554-L7-1
Date: 10th February 2025

Environment Agency
Greater Manchester
Merseyside & Cheshire
Richard Fairclough House
Knutsford Road
Warrington
WA4 1HT

BY Email

Dear Sir/Madam,

RESPONSE TO COMMENTS DON STREET, MIDDLEDTON

We have reviewed your comments dated 27th January 2025 and a response is provided below.

RE-5 Assessment of Site Bunds

The validation report documents that bunded material was stockpiled and 6 soil samples obtained for analysis and leachate testing completed on a further sample to assess the risk to controlled waters. RE5 in the remediation strategy stated that samples would be recovered at a frequency of 1 sample per 200m³. RE5 does not states the total volume of bund material or demonstrate the proposed testing frequency of 1 sample per 200m³ has been complied with.

1) Update RE5 in the validation report to state the total volume of bund material and sampling frequency used.

RE-5 has been updated in the revised Remediation Validation Report (Ref:14-554-R8-3, February 2025).

Soils were stockpiled in bunds along the east (c 200 m³) and west (c 300 m³) of Don Street. The six soil samples meet the required testing frequency of 1 per 200 m³.

RE-18 Delineation, Excavation and Treatment of Infilled Historical Ponds and Streams

The remediation strategy reported that samples would be collected from any infilled features identified and the results assessed against the remediation target values for human health and controlled waters.

Having reviewed the validation report this does not indicate that any samples were collected from the excavated infilled features. The validation report states 'geotechnically unsuitable organic material' excavated from the infilled pond was disposed of from site. However, it is unclear whether all the material excavated from the infilled pond comprised 'geotechnically unsuitable organic material.'

E3P can confirm that all of the excavated pond material was geotechnically unsuitable given the organic nature of the material. The excavated pond arisings were removed from site.





The validation report documents that further infilling works are required to bring the excavated infilled pond to development levels and that 'surplus civil arisings' will be used to achieve the required development levels. However, it is not clear what the 'surplus civil arisings' will consist of or how these materials will be validated to confirm they are suitable for reuse on site in respect of controlled waters.

2) Update of RE18 in the validation report to include any sample results and interpretation of results against the derived controlled waters remediation target values.

If no samples have been collected alternative lines of evidence will need to be provided to demonstrate the reuse of the infilled material does not pose a risk to controlled waters.

3) Update of RE18 to confirm the composition of the 'surplus civil arisings' and reuse criteria protective of controlled waters to be used to demonstrate these materials are suitable to be reused on site.

RE-18 has been updated to include the chemical analysis for the pond arisings (lab report ref: 23-23948). The testing identified a zinc exceedance in sample Pond 002 and a copper exceedance in sample Pond 003 when compared to the remediation targets for the protection of controlled waters. No exceedances were identified with respect to human health. The pond arisings were removed from site, therefore there is considered to be no unacceptable risk to controlled waters.

The pond excavation has not been backfilled to date, given the access restrictions in this area of the site where construction materials are currently stored. An addendum report will be issued following the completion of the works.

The civil arisings will comprise site won Made Ground and natural arisings. The soils will be tested at a frequency of 1 per 1000 m³ in accordance with the testing frequency listed in the remediation strategy for general Made Ground backfill. The soils will be compared to the remediation targets values for the protection of human health and controlled waters.

RE-19 – Delineation, Excavation and Treatment of Former Historic Landfill Materials

The following method statement was produced and submitted to the Environment Agency which documented the methodology for the screening, segregation, and processing of material from the landfill in Parcel B.

• Method Statement (Mechanical Mixing, Screening, Particle Size Reduction Remedial Works). Prepared by Urban Soil Solutions. Don Street. Rochdale. Rev 4. Date: 6th February 2023.

This method statement has not been referenced in the report.

4) Update of RE19 in the validation report to include reference to the method statement detailed above produced by Urban Soil Solutions.

RE-19 has been updated to reference the above report.



Operation 3 – Validation of fines

The validation report documents the fines were suitable for use in relation to controlled waters. Whilst significant commentary has been provided in relation to human health there is limited commentary in respect of controlled waters apart from an interpretation of the heavy metal results.

Further commentary is required to demonstrate that the exceedances, however, minor within the fines do not pose a risk to controlled waters from the reuse of this material.

5) Update of RE19 to provide further commentary on the exceedances recorded to demonstrate they do not pose a risk to controlled waters.

RE-19 has been updated to discuss the contaminant exceedances and the risk to controlled waters.

RE21 – Cut and Filling of Made Ground to Development Levels

It is reported that some minor exceedances were recorded for a number of PAHs. Whilst commentary has been provided in respect of human health no commentary has been provided to demonstrate why these minor exceedances do not pose a risk to controlled waters.

6) Update of RE21 to provide further commentary on the exceedances recorded to demonstrate they do not pose a risk to controlled waters

RE-21 has been updated to discuss the risk to controlled waters associated with the PAH exceedances.

RE-29 – Provision of subsoil

It is reported that a total of 16000m³ of subsoil will be required to be imported to complete the development along with additional sampling and testing to confirm the imported material is suitable for use. It is reported that any additional material is likely to be comprised of 'naturally occurring suitable subsoils.

Whilst a Materials Management Plan (MMP) has been produced for the site RE29 does not state that the MMP will be updated to include any future import of clean naturally occurring soils.

7) Update of RE29 to state the MMP will be updated to include any future import of clean naturally occurring soils.

RE-29 has been updated.

I trust this information is satisfactory to your requirements, and should I be able to be of any further assistance, please do not hesitate to contact me.

Yours sincerely,
For and on behalf of E3P Ltd

Written By
Nicola Sellars
Senior Geoenvironmental Consultant

Approved By
Martin Dyer
Director

