MEMORANDUM

From:	Angela Guy Contaminated Land Officer	**To:**	Sharon Holman Development Management Officer, Economy & Planning
Our Ref:	P/2024/1421	**Your Ref:**	P/2024/1421
Date:	01 November 2024	**No. of Pages:**	2

TOWN AND COUNTRY PLANNING ACT 1990

P/2024/1421 – WOODVILLE GARAGE, GRESFORD ROAD, LLAY, WREXHAM, LL12 0NW

DISCHARGE OF CONDITIONS 3 (SAMPLES), 4, 5 AND 15 (DRAINAGE), 6 (BIODIVERSITY), 7 (LANDSCAPING), 9 (CONTAMINATION), 13 AND 14 (ACCESS) AND 16 (CONSTRUCTION TRAFFIC MANAGEMENT PLAN) OF PLANNING PERMISSION P/2022/0458

The following report has been submitted to the Planning Team under the above planning application:

"Tier Consult Ltd, A Ground Investigation Report for Land at Gresford Road, Llay, Wrexham, Issue 1.0, TE1010GIR, Final' dated 11 November 2017".

The report has been reviewed and commented on as detailed below.

1. It is noted that no asbestos has been identified in soils.
   An enquiry was raised in 2016/7 regarding the potential risk of asbestos within/on the buildings at the site – at the time we advised that was not a contaminated land matter because it falls under Health & Safety legislation. Because it has been raised as a concern in the past I am taking this opportunity to mention it again in case it is a matter that needs addressing. Should asbestos be present in the buildings then incorrect treatment of it during demolition works could result in new soil contamination. It would be advisable to confirm within a Remediation Validation Report that this matter was checked and what actions resulted from that so it is clear no new contamination from asbestos has taken place.

2. I consider that the gas risk assessment is sufficient, although the investigation was impeded by a high water table. However section 6.5 states the site should be categorised as CS2 (low risk) based on the maximum recorded carbon dioxide concentration of 10% v/v, but section 8.1 then states that it falls within Characteristic

Situation 1 (CS1)). Section 9.5 does refer to CS2 again and the need for a volatile resistant membrane. I am in agreement with these remediation measures. These measures are however omitted from the Outline Remediation Requirements detailed in 9.7.

3. I am in agreement with the findings of the intrusive site investigation in regard to chemical contamination and the outline remediation requirements detailed in section 9.7. i.e:

   i) a clean cover system for soft landscaped garden areas – this should include patio areas (as these can be considered temporary if a future owner decides to change the landscaping within their garden) and front gardens. Driveways do not require such remedial works. Clarification on the depth required should be provided in the Remediation Strategy (see below) as it is noted section 9.7 refers to 600mm and the Executive Summary states 1000mm deep clean cover system for soft landscaped areas.
   ii) water supply pipe protection (unless a pipeline risk assessment indicates barrier pipe isn't required – this would need to be submitted for approval by the Council).
   iii) removal of existing and any previously unidentified USTs/Interceptors.
   iv) excavation and offsite removal of visual/olfactory impacted soils. (please note Natural Resources Wales is the appropriate body in Wales, not the Environment Agency).

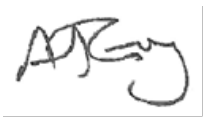
   As mentioned in 2. Above gas/vapour protection measures are an additional remediation requirement too.

4. A Remediation Strategy is required, this should detail the validation works that will also be required to demonstrate the remediation measures have been undertaken to a satisfactory standard. This will include additional soil testing to demonstrate sufficient removal of impacted soils has taken place – it should identify where those soils are known to exist and the need to chase those out and the testing of the base and side walls of that resultant excavation. Testing of the areas following the removal of the petrol station infrastructure is also needed i.e. USTs, interceptors, above ground tank, forecourt area.

Before I can recommend the discharge of condition 9 the Remediation Strategy should be prepared and submitted for approval by the Council.

Please note the report covers geotechnical matters and radon, however I have not reviewed those elements of the reports as they are not within my remit.

Should you have any queries regarding the above then please contact me on Ext. 8771.



.....

Angela Guy
Contaminated Land Officer