

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Gwyn Humphreys
Planning Officer

Our Ref: P/2023/0763

Your Ref: P/2023/0763

Date: 20 March 2024

**No. of
Pages:** 2

TOWN AND COUNTRY PLANNING ACT 1990

P/2023/0763 LAND OFF MOLD ROAD GWERSYLLT WREXHAM

DISCHARGE OF CONDITIONS 7 (ACCESS SCHEME), 8 (ARBORICULTURAL METHOD STATEMENT), 9 (CONTAMINATION), 11 (VALIDATION REPORT), 12 (MAINTENANCE REPORT), 13 (METHOD STATEMENT), 14 (DRAINAGE), 15 (DRAINAGE), 16 (LIGHTING), 17 (ECOLOGY) AND 18 (MATERIALS) OF APPEAL DECISION APP/H6955/A/18/3207621 (P/2017/0927)

The following additional information has been submitted for the above application.

- Bigfoot Geo, Tank Removal Validation Report for J10 Planning at Gwersyllt, BFG1042 R01, February 2024.

I have reviewed this report and can comment as follows.

- a) The report is brief and lacking details, particularly on the tank removal methodology and findings. There are also no photos of the works.
- b) It is stated in 4.1 that the Clancy Phase 2 report confirmed the presence of underground storage tanks and recommended the inspection and removal of fuel storage tanks prior to site development. Recommendations also included the excavation of trial pits to be carried out directly beneath and around the tanks, with further soil samples recovered for chemical testing. No further trial pits appear to have been undertaken as part of these works.
- c) It is stated in 4.2 that "*Peter confirmed the tanks (three) were excavated down the front and sides, prior to removing for disposal as scrap metal off-site. Once the tanks were removed, excavated materials were placed back in the excavation and tracked to provide a compacted surface.*" Section 4.3 states "*Following removal of the tanks, Bigfoot Geoenvironmental attended the site (May 2023) to undertake validation*

sampling." No actual evidence has been provided that demonstrates the tanks were removed, is there any documentation and photos of the works held by the contractor Peter Walling?

- d) The validation samples of the side walls and base should have been taken immediately on removal of the tanks, in the resulting void, along with visual observations of the state of the void and notes of any odours/vapours. It appears however that the sampling was done some time later, after backfilling the void, by digging a trial pit into the backfill material and then sampling the side walls and base of the trial pit. This method means that the soils samples are the backfill material and will not be representative of the tank void walls.
- e) It is not clear what assessment criteria have been used to establish whether any exceedances were present.
- f) Details of the source of the backfill material have not been provided.
- g) The Terraconsult Phase I report (not referred to in this Validation Report refers to other tanks, in previous Memos (see comments below) I have raised queries on these areas but no response has yet been provided and it is noted that there is no mention of them in this report:

Area 1 – a bunded heating oil tank

Area 3 – a heating oil tank (pipework known to have been damaged), 2 large oil tanks within the eastern part of a shed within the large building and in the western part evidence of hydrocarbon staining on the concrete floor, a diesel tank on a brick plinth in SW corner and a new plastic bunded tank on top of old metal tank next to the last shed; and

Area 4 – a heating oil tank

In conclusion I do not consider this validation report to be sufficient.

Furthermore, in a Memo dated 5th January 2024 I detailed that no response has been provided to other concerns detailed in a Memo a year earlier, 5th January 2023 regarding two reports for the above development (in relation to P/2017/0927). These queries still remain relevant. I raised more queries in my Memo of the 5th January 2024 and these also remain outstanding (i to xi).

In regard to the discharge of conditions 9, 11 and 12 at this time I do not consider there to have been sufficient investigation of the site to recommend the discharge of condition 9. The validation report which has now been submitted and discussed above is insufficient therefore I also can't recommend the discharge of condition 11. Currently there is no monitoring, maintenance or contingency actions identified, however until sufficient investigation has been undertaken it can't be known if this situation may change, therefore the discharge of condition 12 is not recommended.

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



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Angela Guy
Contaminated Land Officer