

MEMORANDUM



From: Stacey Inglis
Contaminated Land Officer

To: Mared Rees-Jones
Planning Officer

Our Ref: P/2021/0987

Your Ref: P/2021/0987

Date: 22 October 2021

**No. of
Pages:** 3

TOWN AND COUNTRY PLANNING ACT 1990

RE: P/2021/0987 – DISCHARGE OF CONDITIONS 3 (MATERIALS) 4 (LANDSCAPING) 8 (CONTAMINATION) AND 11 (ARBORICULTURAL METHOD STATEMENT) OF PLANNING PERMISSION P/2020/0501

VICARAGE HILL COURT VICARAGE HILL MINERA WREXHAM

The following letter report has been submitted for the discharge of condition (8) of planning permission P/2020/0501:

- GroundSolve Ltd, Letter report RE: Vicarage Hill Court Minera – Soakaway and Chemical Testing. Dated 7th October 2020

Having reviewed the above letter report I have the following comments to make, I trust that they will be forwarded to the appropriate person(s):

It is stated that GroundSolve Ltd have been appointed to excavate a trial pit and carry out permeability testing, however this letter report has been submitted to discharge condition 8 (contamination). This letter report is insufficient and does not meet the requirements of a contamination assessment as set out in condition 8 of planning permission P/2020/0501.

I can provide the following specific comments on the information within the letter report:

1. In accordance with current authoritative guidance a phase 1 preliminary risk assessment (desk study) must be undertaken prior to any intrusive site investigation works being done. The purpose of a preliminary risk assessment is to develop an outline conceptual site model and identify all possible pollutant linkages, this will then aid in the design of future investigation works. This is an absolute requirement for all contamination assessments, please can you advise if this has been carried out and provide a copy to the Council for written approval, if such an assessment has not been carried out, what is the justification for not doing so?

2. 2.0 Site Investigation – The site investigation presented is insufficient and has not been undertaken in accordance with current authoritative guidance (such as Land Contamination Risk Management (LCRM) and BS:10175:2011+A2:2017). The following information has not been provided:
- Summary of previous reports to include preliminary risk assessment and outline conceptual site model (discussed in Item 1 above, yet to be submitted).
 - Site investigation methodology.
 - Justification for the sampling strategy and chemical suites chosen. Please note that one sample location is insufficient for the size of the development site.
 - Detailed plan showing the location of the sampling points. It is stated that the location of the trial pit/permeability test is presented on figure 2 however there is no such figure attached.
3. 3.0 Ground Conditions – It is stated that ‘*The ground conditions encountered in the boreholes typically comprised..*’ however it is my understanding that only one trial pit was dug on site, please can you clarify this? It is also noted that the trial pit log is presented in Appendix A, yet this is not included within the letter report, please can this be provided?

A key part of a contamination assessment is characterising the ground conditions on site to further refine the conceptual site model and increase your understanding of the nature and extent of contamination that may be present. As there is no conceptual site model presented it is not possible to determine if the ground conditions have been adequately characterised, furthermore there has been no justification for only one trial pit. As stated above one trial pit location is insufficient.

4. 4.0 Chemical Testing – It is acknowledged that the three samples taken from the one trial pit on site do not show any elevated level of contaminants, however as detailed above in Items 1 to 3 the site investigation undertaken is insufficient. It is therefore not possible to draw any conclusions regarding the contamination that may or may not be present on this site.

Please can you clarify which adopted guideline values that have been used, it is stated that the final end use of the land is ‘residential with gardens’ however the guideline values presented within your table are not those for ‘residential with gardens’.

It is stated that chemical analysis results are presented in Appendix C, yet this is not included within the letter report, please can this be provided?

Finally, there has been no discussion of the results of the chemical analysis in relation to a conceptual site model (that should be included within a desk study, yet to be submitted). There are also no recommendations for further work within the letter report and no discussion of information gaps or uncertainties.

I look forward to receiving a response to my comments in due course. For your information I have attached the following guide ‘Development of Land Affected by Contamination: A Guide for Developers’.

Please note that as the contamination assessment at the above site has yet to be completed to the satisfaction of the Contaminated Land Team I cannot recommend that discharge of condition 8. Should you have any queries regarding the above then please contact me on Ext. 8773.



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Stacey Inglis
Contaminated Land Officer