

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Matthew Phillips
Planning Officer

Our Ref: P/2023/0247

Your Ref: P/2023/0247

Date: 31 May 2023

**No. of
Pages:** 3

TOWN AND COUNTRY PLANNING ACT 1990

P/2023/0247 The Racecourse, Mold Road, Wrexham, LL11 2AH

DISCHARGE OF CONDITIONS 5 (CONSTRUCTION MANAGEMENT PLAN), 6 (CONTAMINATION) AND 10 (PILING) OF PLANNING PERMISSION P/2022/0725

The following reports have been reviewed:

- Wrexham AFC Kop Development, Interim Contaminated Land Interpretative Report, prepared by Ramboll for Wrexham Association Football Club, Issue 01, 06 April 2023
- Wrexham AFC Kop Development, Interim Contaminated Land Interpretative Report, prepared by Ramboll for Wrexham Association Football Club, Issue 02, 28 April 2023

To avoid duplication of conditions which are similar, it is noted that the conditions applied to the planning permission are those requested by NRW. Where both NRW and this Team raise concerns the approach will ordinarily be for NRW to have a focus on controlled water risk assessment and this team to focus on human health risks. Consequently on reviewing the reports and providing comments the focus on the Contaminated Land Team has been with regard to the human health risk assessment, including gas risks.

The reports refer to details of piling (condition 10) and infiltration permission (condition 11), other than where these directly link with potential contamination concerns, these matters have not been considered by this Team as they are not within our remit. Similarly this Team has not reviewed the radon assessment in section 6.5 as this is also not within our remit.

I can provide the following comments, before this Team can confirm whether we concur with the findings of the second revision of the report in regard to human health and gas risks, please can responses be provided to the following queries?:

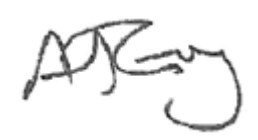
1. The Contaminated Land Team recommended a condition to assess for potential land contamination due to the mound at the site and likelihood of made ground being present. It is noted that the contamination assessment identified extensive made ground at the site, it is understood that the on-site mound has now been removed but please can this be confirmed.
2. There is no explanation of the potential source of hydrocarbon contamination identified in TP104, was there anything evident that could explain its presence. What was the reason for not delineating and further investigating the area of hydrocarbons? Paragraphs 10.3.3 and 10.3.4 discuss the use of a Land Quality Method Statement (LQMS) and Verification Plan, this would include a watching brief during the earthworks for unforeseen ground conditions including potential contamination concerns. This is considered a suitable proposal as it will address unexpected contamination that may be encountered as well as works in the vicinity of TP104.
3. The interim report covered the gas monitoring that had been undertaken up until that time, some installations required a further 4 monitoring rounds. This work has since been undertaken and the second issue of the report details the findings, however some parts of the report have not been updated, paragraph 6.1.4, Table 8.1 and 10.1.2 & 10.1.11 for instance. Were BH's 104, 105 and 106 on the mound and was their purpose to monitor the gas potential within the mound, or had the mound been removed prior to their installation (it is noted that paragraph 4.4.5 does state the material has been removed from site but it is not clear at what time this was in relation to the intrusive investigation works taking place)?
4. Were TP100 – 104 below the footprint of the mound and therefore this sampling was undertaken after the removal of the mound?
5. In paragraph 4.4.5 it is stated that 15 samples of the mound beneath the old Kop Stand were taken by P.P O'Conner Limited as part of the additional ground investigation, the samples were screened for metals, inorganic, PAHs, TPH, VOC including tentatively identified compounds (TICs) and SVOC including TICs and asbestos screening. No trial pit logs, soil descriptions or photos were provided for the mound material. Was a plan provided of the sampling locations?

As outlined in paragraph 10.4.1 of the report, the reports referred to above along with the Desk Study Report previously submitted and commented on by this Team, are sufficient (subject to clarification of the above queries) and meet the requirements of conditions 6 parts I, II, III from the human health and gas risk perspective. On receipt of a satisfactory response to the above queries we will be able to recommend the discharge of condition 6 parts I, II and III.

It is recommended that the LQMS is submitted for the discharge of condition 6 part IV. The LQMS should provide details on the need or otherwise of imported soils for the above ground planters and tree pits which are proposed for the public realm area and the testing of that material. On receipt of a satisfactory LQMS we will be able to recommend the discharge of condition 6 parts IV.

We agree, from a human health perspective, that a Remediation Options Appraisal and Long Term Monitoring Plan (condition 8) are not necessary based on the findings of the assessment to date.

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

A handwritten signature in black ink, appearing to read 'Angela Guy', enclosed within a thin black rectangular border.

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Angela Guy
Contaminated Land Officer