

MEMORANDUM



From:	Angela Guy Contaminated Land Officer	To:	Amy Brittain Planning Control Lead
Our Ref:	P/2022/1015	Your Ref:	P/2022/1015
Date:	09 March 2023	No. of Pages:	1

LAND OFF JACQUES WAY, WREXHAM P/2022/1015

The following report has been submitted for the above application:

E-Geo Solutions 'Development at Jacques Yard, Jacques Way, Regent Street, Wrexham, LL11 2BY, Phase 4 – Site Remediation Verification Report, Report No. E1659.PH4.VER.R2, January 2023'

Further to my previous Memo dated 03 January 2023 I have reviewed the report and can now comment further on the queries I raised at that time:

1. *Plots on the western side of the site (plots 1-7, 18-25 (except 24)) are not referred to within the report and consequently have no verification.*

The revised version of the report now covers plots 1-7 and 25. It remains unclear what remediation was required/verified for plots 18-23.

2. *The imported soils appear to be recycled, based on the supplier details provided. The quantity of sampling undertaken is not considered sufficient for recycled material. Guidance on verification sampling 'Requirements for the Chemical Testing of Imported materials for Various End Uses and Validation of Cover Systems', May 2013 provides advice on verification of imported soils. The testing frequency within that guide details a higher frequency than has been undertaken and recommends consultation with the Council as the requirements for each site will vary and will also be dependent on the source of the material being imported. Further information on the source of the imported material should be provided so that agreement on the sampling frequency can be discussed and any further sampling requirements agreed.*

Just to note that from a previous enquiry I received in January 2022 I understood that the imported soil was coming from another Castlemead development site which was in

Kelsall, Cheshire. It was to be brought onto site under a U1 exemption, the volume was 120m³ and if more was required then a topsoil and subsoil supplier was to be used to purchase accredited clean material.

The revised report provides a verification letter prepared by Ensafé dated 12 January 2022 in appendix 1.1. It confirms the suitability of the soils for re-use in the gardens and details photographs and test results from 3 samples taken from stockpiles at the site in Kelsall (referred to in my query above). However, there is no detail in the report about the site where the soils have arisen, other than the location. Furthermore the photographs for plots 1 -7 appear to show a different soil, which resembles a manufactured topsoil. Confirmation is required on:

- i) the former use of the site in Kelsall, is it greenfield? Evidence of the history of the site is required.
 - ii) Has other material been imported too? As mentioned in my query the Kelsall source didn't seem to have sufficient quantity. If another source has also been used then verification details of that material is also required (source and chemical analysis).
 - iii) If the answer to ii) is yes, then clarification of which material was placed where is required. Is the material from Kelsall on plots 8-17 and plot 24?
3. *In an email from Joe O'Donnell at Castlemead to Matthew Phillips dated 16 June 2020 it was stated that details of water supply pipe protection were in the Remediation Statement [Strategy], however I have been unable to find those details. No mention is made within the verification report about the protection of the water supply, details of measures undertaken need to be provided.*

The revised report provides a verification details of the water supply pipe in section 5.5, the details are sufficient, nothing further is required on this matter.

4. The verification report does not detail whether any previously unidentified contamination was found during the development works and if it was, what measures were taken to assess it.

The revised report provides details on this and it is sufficient, nothing further is required on this matter.

As further information is required I cannot recommend the discharge of condition 10 at this time.



Angela Guy
Contaminated Land Officer