

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Sarah Hill
Planning Officer

Our Ref: P/2022/0417

Your Ref: P/2022/0417

Date: 17 October 2022

**No. of
Pages:** 2

TOWN AND COUNTRY PLANNING ACT 1990

P/2022/0417 WMBC CAR PARK BONC WEN RHOSLLANNERCHRUGOG WREXHAM

DISCHARGE OF CONDITIONS 3 (MATERIALS), 8 (CONTAMINATION) 10 (DUST MANAGEMENT) AND 15 (COAL) OF PLANNING PERMISSION P/2020/0725

The Contaminated Land Team is only providing a response in regard to the discharge of condition 8 and where geotechnical assessments have been undertaken and recommendations made these have not been commented on as they are not within the remit of this Team.

Further to my Memo dated 18 July 2022 the following documents have now been submitted, a review of these in relation to condition 8 is provided below:

- GroundSolve Ltd, Preliminary Risk Assessment Bonc Wen: GSL2774 Version 1, 16 September 2022; and
- GroundSolve Ltd, Phase 2 Ground Investigation: Bonc Wen, Wrexham, GSL2774 Final 26 September 2022.

Preliminary Risk Assessment (PRA) Report

The content and findings of this report is sufficient. There is reference to the EA in section 6.3, please note in Wales it is NRW that should be consulted on matters relating to waste.

Whilst not specifically within the remit of the Contaminated Land Team to ensure this matter is not overlooked I have raised it here. The drilling of boreholes into the coal measures (or below the till) may have created potential gas migration routes. Whilst it is noted that past investigations have not detected gas risks from coal measures it may be prudent to ensure

any potential direct pathways from boreholes are removed or dealt with (the report refers to at least 5 having been drilled on the site in the past).

Phase 2 Ground Investigation

The content and findings of this report is sufficient, the site investigation makes use of past investigation findings and combined it is noted that they take account of the areas of the proposed gardens and potential main sources of contamination, whilst also providing reasonable site coverage.

However, as referred to in my comments above in regard to the PRA, the discussion on gas risks does not consider the potential risk of pathways from boreholes.

The report concludes that remedial measures are required, these are:

Where garden areas are proposed, it is recommended that any made ground is removed by excavation to a depth of at least 600mm, and replaced with clean capping layer, comprising imported subsoil (400mm minimum) and topsoil (200mm minimum).

As detailed in section 6.2, upon completion of the development and remediation of the garden areas, the cover system will require validation of its thickness and testing to demonstrate its suitability for use in garden areas. A report detailing the validation works should be submitted for approval and the discharge of condition 9.

In conclusion, the risk assessment of land contamination concerns at the site for the proposed development, as considered by the report, is sufficient, along with the proposed Remediation Strategy, I can therefore recommend the discharge of condition 8.

It is noted the remediation works in regard to addressing coal mining risks are not yet completed, there is therefore an opportunity to still address potential risks from mines gas via the boreholes.

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



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Angela Guy
Contaminated Land Officer