

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: AH2
Planning Officer

Our Ref: P/2022/0397

Your Ref: P/2022/0397

Date: 10 May 2022

**No. of
Pages:** 3

TOWN AND COUNTRY PLANNING ACT 1990

P/2022/0397 – 17, Fairwood Drive, Gwersyllt, Wrexham, LL11 4DE

TWO STOREY REAR EXTENSIONS

When an application for an extension (or similar) is made this Team routinely reviews whether any past land contamination conditions were requested for the original development, and if they were, then in making recommendations for the current application we will consider any contamination assessment reports were submitted and whether an remediation works were required and if so whether they were subsequently validated.

I have reviewed our records regarding the original development of this site as potential land contamination concerns were raised at that time and recommendations for conditions were made. Our records for this site are extensive and they indicate that those matters were not fully addressed for various areas of the site. The development of this particular area was known as Phase 5 and copied below is the most recent correspondence which I believe explains the outstanding issues for Phase 5.

Notwithstanding the above, the above application is unlikely to create new land contamination concerns since the building (the extension) will create a barrier to any residual risks which may remain in the soil. Consequently I am not making a recommendation for a condition for this application.

Radon protection was advised by the consultant in the past, however this is not under the remit of the Contaminated Land Team. I understand it would be part of the Building Regulation requirements.

It is recommended that any the original outstanding contamination concerns are still addressed.

In a letter from me to Merebrook Consulting Ltd dated 04 July 2012 and copied into the Planning Department.

Other matters outstanding

Phase 5

I recall from our telephone conversation a few days ago that you will soon be submitting further details regarding the remediation for Phase 5. I have checked our file and can confirm that from our perspective the issues detailed in Stacey Inglis's letter dated 17 June 2009 are still outstanding, I have attached a copy for your convenience. I am aware that you said the ground levels in this area have altered and therefore the contamination status has been re-evaluated, thus I appreciate that some of the issues detailed in the letter may no longer be relevant.

In a letter from Stacey Inglis to Merebrook Science and Environment Ltd dated 17 June 2009 and copied into the Planning Department.

LAND TO THE SOUTH OF HOPE STREET, GWERSYLLT, WREXHAM (Phase 5) – P/2007/0849

Thank you for providing a copy of the Remediation Proposal dated November 2007 (ref: RMS-1875-07-28) in support of the above planning application. Apologies for the delay in responding this is due the planning application not yet being determined by the Planning Department and the building work on the other phases of the development being on hold. Whilst it is my understanding that the situation has not changed, I felt it would be prudent to provide you with this Departments comments on the Remediation Proposal.

1. It is recommended within the proposal to install radon protection measures within all the buildings in Phase 5. Please note that this Department does not take the lead in relation to radon and it is recommended that the proposals are submitted to your chosen Building Inspector for comment.
2. It is stated within the proposal that representative contaminant concentrations have been calculated and do not indicate a risk to human health or environmental receptors. I am not in agreement with this as there are some outstanding issues detailed in my colleague, Angela Guy (then Thompson), letters dated 23 December 2005 and 16 February 2006 (Item I).

The outstanding issues are in relation to the western section (former railway embankment) of Phase 5. Concerns were raised that the made ground at the western section of the site has more contamination than the eastern section and that there may be an exceedance of the SGV for arsenic for the samples taken from the western section. It was suggested in our letter dated 23 December 2005 that the results were re-evaluated. Merebrook provided a response to these concerns in a letter dated 08 February 2006, however there are still some outstanding issues as detailed in our letter dated 16 February 2006:

"Item i) The data sheet regarding the arsenic statistical assessment was not attached to the letter. I am unclear about which analysis result you are referring to with regard to MTP11. The only result I have is for the other pit MTP11 (marked in blue in the south

west corner of the site) dating from Feb 2004. This sample is sand and therefore is not representative of the other sample. I do not have any lab analysis result for sample BH5 and BH6. Since you mention that this area of the site is to be re-profiled and as a result the Remediation Method Statement does not include it, I agree that further discussion of this zone in terms of contamination risk assessment for the final end use is of limited value. However, if material is to be moved from this area to another area of the site, or off site, then further details of this work should be provided. I would recommend that for either of these activities the Environment Agency Wales is consulted, in addition, the details of the work should also be provided to this Department."

Whilst I appreciate that it has been several years since the above was discussed I cannot agree to the Remediation Proposal until the above issue has been addressed as it has not been referred to within the Remediation Proposal.

3. Section 5.2 - It is recommended that clean cover is provided for amenity purposes in the area of made ground. Please can you provide further details on the depth of the clean cover?

(Please note that this Department cannot agree that the clean cover is sufficient until Item 2 has been resolved.)

4. The importation of any topsoil to the site should be suitably validated i.e. chemical analysis and confirmation of the source of the soil should be provided in writing for approval by the Council.
5. It should be noted that if any material is removed from the site then waste transfer notes should be copied and provided to the Council to demonstrate that these works have been satisfactorily carried out.

Should you have any queries regarding this letter please do not hesitate to contact me on the above telephone number.

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



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Angela Guy
Contaminated Land Officer