

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Simon Greenland
Planning Officer

Our Ref: P/2022/0417

Your Ref: P/2022/0417

Date: 18 July 2022

**No. of
Pages:** 3

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. The following documents have been reviewed in relation to condition 8:

- Datrys, Desk Study & Site Walkover Report: Bonc Wen, Rhos, Affordable Housing, September 2014 (split into Part 1 and Part 2)
- Strata Renewables Limited (SRL), Ground Investigation Report, Report No. SRL164 Bonc Wen, Rhosllanerchrugog, 27th April 2015

Desk Study & Site Walkover Report

The report does not follow the conventional format of a Preliminary Risk Assessment (PRA) for land contamination, however it does cover the majority of the areas which should be within a PRA and in principle is sufficient as a result (this is partly because the subsequent report by SRL Ltd progresses matters to the next stage of assessment, an intrusive investigation). However when undertaking similar works in the future, regard should be given to the following points:

1. If a report is more than a few years old then this fact should be observed and clarification provided on why it is still considered up to date. In the case of this report it is 8 years old and it is possible issues could have arisen in that time which would alter the conclusion of the report.
2. For contamination assessment purposes a report should be prepared following authoritative guidance and with the aim of establishing risks to users of the site and

the environment, this report states it considers the risks to structures and their foundations although some elements of land contamination are referred to. Please note that whilst the report considers geotechnical matters, such as foundation requirements, and also radon protection, no assessment of these has been made by the Contaminated Land Team since this is not within our remit.

3. In section 10.3 (p9) item 1 refers to water courses, however the discussion is in regard to groundwater, flooding and leaching potential and there is no information provided about surface waters (although later on p19 it is stated that there are none near to the site).
4. It is noted that in section 10.3 under item 5 topsoil and fill material will be stripped from the site.
5. In section 10.3 item 6 considers sulphate attack on concrete stating that it is unlikely, however no explanation of why it is considered unlikely is provided. It is however noted that testing will be required to confirm their statement.
6. In section 5, off site sources are considered on p17, however the gas works adjacent to site as referred to earlier in the report is not mentioned.
7. The majority of the recommendations provided in section 6 on p20 are regarding geotechnical matters. Only the first part of item 6 recommends considering land contamination matters in further detail.

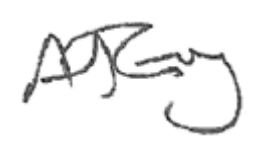
Ground Investigation Report

Comments on this report are as follows:

- a) As mentioned above, reports that are more than a few years old should be supported by a current statement justifying the reasons it is still relevant. Also as mentioned above, geotechnical matters are not within the remit of this Team and have not been considered in this response. As this report is 7 years old it would be appropriate to confirm that nothing significant has changed on the site that would cause this assessment to need revising or be no longer applicable.
- b) The report is mainly factual, there is no interpretation of the site investigation results in terms of whether any significant land contamination concerns have been found to be present, this needs to be completed.
- c) As part of the interpretation, explanations on the design of the works should be provided, for instance were trial pits/boreholes targeted to evaluate any ground contamination in areas of concern (as identified in the desk study)? Were samples taken at specific depths for a reason, issues such as exposure risks from site users, controlled waters, changes in site levels are relevant. Were relevant guidance values exceeded for soil contamination?
- d) There is no assessment of the gas risks from the ground. It is noted that the gas monitoring seems to be targeting coal gas rather than the backfilled ground. Evaluation of any risks from the back filled ground should be considered.
- e) Controlled waters have not been discussed as a potentially significant receptor, the desk study has mentioned groundwater could be a receptor and an evaluation of this should be provided.

At this time I would advise condition 8 should not be discharged since the land contamination risks assessments are not sufficient.

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