

Condition 3 d.)

Marked up with comments 23/2/22. AD

4 pages

## MEMORANDUM



**From:** Stacey Inglis  
Contaminated Land Officer

**To:** Matthew Philips  
Planning Control Lead

**Our Ref:** P/2021/0813

**Your Ref:** P/2021/0813

**Date:** 27 January 2022

**No. of  
Pages:** 4

### TOWN AND COUNTRY PLANNING ACT 1990

**RE: P/2021/0813 – DISCHARGE OF CONDITIONS 3 (CONTAMINATION) 5 (ARCHAEOLOGY) 6 (ECOLOGY) 7 (DUST MANAGEMENT) AND 8 (MATERIALS) OF PLANNING PERMISSION P/2020/0844**

### LAND OFF HIGH STREET JOHNSTOWN

The following additional information has been submitted via email for the discharge of condition 3 of planning permission p/2020/0844.

- GroundSolve Ltd, Ruabon Road, Johnstown. Proposed Residential Development. Geo Environmental Report. Gower Homes. Revised Dated December 2021.
- GroundSolve Ltd, Letter Re: Discharge of Condition 3 (Contamination). Dated 22 December 2021.
- Dets Certificate of Analysis, Willow Cottage. Dated 14 September 2020
- GroundSolve Ltd, Letter report Re: Belgrave Court, Johnstown: Additional Testing. Dated 17 January 2022.
- Waste Transfer Notes.
- Emails from Doug Bailey dated 21 January 2022 and 26 January 2022.

This additional information has been reviewed in conjunction with previous contamination assessments submitted in support of planning permission P/2020/0844.

- GroundSolve Ltd, Letter report Re: Johnstown Chemical and Physical Test Results. Dated 18 August 2020.
- GroundSolve Ltd, Ruabon Road, Johnstown. Proposed Residential Development. Geo Environmental Report. Gower Homes. Dated July 2021.

I have the following comments to make, I trust that these will be forwarded to the appropriate person(s). Please note that I have not provided comments on the geotechnical assessment in the report as it is not within the remit of the Contaminated Land Team.

For ease of reference I have kept the same numbering from my memorandum dated 03 September 2021, my original comments are in black, with additional comments in blue.

1. Section 5.2 – It is stated that a chemical storage area was present in the north western section of the site, please can this area be marked on your site layout and exploratory hole location plan (figure 2).

✓ No further action required.

2. Section 6.1 – It is noted that in the previous investigation TP02 (later in report referred to as TP B) was not logged, please ensure that all future excavations for the contamination assessment are logged. If possible, please can you clarify if the made ground where the sample was taken is similar to other made ground identified on site?

✓ A satisfactory response has been received.

3. Section 8.0 – It is noted that in TP01 a sample was taken at 2m due to a hydrocarbon odour, why was no sample taken from the made ground above?

Ref. Groundwater  
email  
2/2/22  
response.

It was stated in your response (letter dated 17 December 2021) that samples were taken from similar made ground at nearby trial pits to TP01. However the reason for my query was due to TP01 being in close proximity to the location of the fuel tank and the noted hydrocarbon odour. My main concern is that fuel may have spilled / leaked leading to contamination of the surrounding ground. It is acknowledged that a sample was taken from the depth of where the hydrocarbon odour was noted, however a sample should have been taken from the shallower made ground. How did the oily sheen get to 2m, has it migrated from the fuel tanks or another potential source of contamination?

4. Section 8.0 & 9.0 – Given the size of the site the number of samples taken for chemical analysis is limited and is focused to small sections of the site. It is however acknowledged that further site investigation works are going to take place once the buildings and storage tanks have been removed. Please can you provide further details of the proposed works, to include the location and number of samples that are planned and the chosen chemical analytical suite?

Is it your intention to take samples from other areas of the site that is currently covered by buildings to get a greater coverage of the site? If not, what is your justification for not doing so?

It is acknowledged that additional investigations have been undertaken and presented within the revised report. I have the following comments to make about the revised report:

- a) Section 8.0 - Please note that the adopted guidelines in the additional site investigation test results section in the revised report are incorrect as they are not for residential with garden areas. I have cross referenced them with the correct values and there are no exceedances (not including asbestos which is discussed in item 6 below).

Noted  
Thank you ✓

Ref to  
Groundsolve  
email?  
2/2/22.

- b) Section 9.1 - The site plan shows that the area of the former tank is to form residential gardens therefore it is important to fully assess the area beneath the fuel tank, especially given that photograph 8 shows that the tank was in poor condition. It is stated that the tanks were removed during demolition works and TP101 was excavated at their location, however TP101 on figure 2a appears to be adjacent to the fuel tank rather than from the footprint. Please can you confirm if it was beneath the tank? If it was adjacent then further sampling from the footprint is required.

5. Section 9.2 - It is noted that the electrical substation is located on the site, is it to remain post development? If not, is it your intention to include this area in the additional investigations and test for PCBs?

Ref to  
Gover letter  
23/2/22.

It is noted that the substation has been removed after inspection from Scottish power and no PCBs were detected, however the sample was taken from a trial pit adjacent to the substation. Please can you provide further details on the construction of the substation, for example was the substation on concrete that has then subsequently been removed during decommission? Or was it constructed directly on the ground? This will determine whether further sampling is required as the Council expects all samples to be taken beneath the footprint of potential sources of contamination, not just adjacent. This is especially important given that this area is going to form a residential garden area.

6. Section 9.5 - Asbestos has been identified within TP06 and it is stated that it is not considered a risk if it is under a building / hardstanding or covered with clean material, however no details have been provided for what is actually proposed in this area. Please can you provide further details?

✓ It is noted that the area at TP06 is going to form a residential garden area.

Furthermore TP06 is in a section of the site where there has been very limited sampling therefore there is the potential that the asbestos contamination identified may be more widespread, is it your intention to take further samples in this section of the site during the additional investigations? If not, what is your justification for not doing so?

✓ It is stated within the revised report that further testing, TP102, found no asbestos and that large areas of this section of the site were excavated and processed due to excessive concrete obstructions in the ground. I am in agreement that a watching brief should be kept on all excavations, should any asbestos be identified then it should be removed, disposed of appropriately and further testing undertaken. The Council should also be notified.

7. Section 9.11 - I am in agreement that all topsoil imported to site must be tested to demonstrate it is suitable for use. Details of the source of the topsoil, volume to be imported, sample frequency and chosen chemical suite should be submitted to the Council for written approval, and then the subsequent analysis results must also be submitted to the Council for written approval. This should be completed prior to any material being brought onto site.

Noted and  
will respond  
separately.  
Can this be agreed  
prior to  
occupation?

It is noted that chemical analysis results have been provided for a site known as Willow Cottage, however please can you provide further details on the source of this material and the volume of material to be imported. I am in agreement that not every garden requires validation, however please can you advise the frequency of sampling that you are proposing. As stated above this must be approved in writing by the Council prior to any material being imported to site. For guidance, please find attached our 'Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems'.

8. Section 9.11 – I am in agreement with the proposed additional site investigation works beneath the location of the above ground fuel tanks, pipelines and chemical storage area. Please can you ensure that the chemical suite chosen includes for solvents.

✓ It is acknowledged that additional investigations have been undertaken and presented within the letter report dated 17 January 2022. The letter report is satisfactory.

9. Section 9.11 – I am in agreement that the asbestos sheet cladding should be removed from site by a suitably qualified contractor, details of which should be included within the verification report, including copies of all waste transfer notes to demonstrate that it has been appropriately disposed of.

✓ No further action required as copies of the waste transfer notes have been provided.

Please note that I cannot recommend the discharge of condition 3 until all the information, detailed above, is submitted and approved in writing.

Should you have any queries regarding the above then please contact me on Ext. 8773.



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**Stacey Inglis**  
**Contaminated Land Officer**