

MEMORANDUM



From:	Angela Guy Contaminated Land Officer	To:	Matthew Phillips Planning Control Lead
Our Ref:	P/2018/0350	Your Ref:	P/2018/0350
Date:	25 July 2018	No. of Pages:	3

DESK STUDY & SITE WALKOVER REPORT + GEOTECHNICAL DESIGN REPORT TABOR HILL, COEDPOETH, WREXHAM

The following reports have been submitted in support of the above planning application.

- Tabor Hill, Coedpoeth Desk Study & Site Walkover Report, Rev A, June 2018 by Datrys
- Tabor Hill, Coedpoeth Geotechnical Design Report, Rev A, June 2018 by Datrys

Desk Study & Site Walkover Report

Having reviewed the report I can provide the following comments and I trust that you will forward them to the appropriate person(s). Please note that I have not provided comments on the geotechnical aspect of the report as it is not my area of expertise or within my remit.

1. It is noted that the report isn't signed and it is not clear if that therefore constitutes a final version that is legally reliable and defensible.
2. The desk study identifies the only past use as being educational, however the design and access statement does indicate it was a kitchen facility and the Groundsure report in the appendix of the desk study states the address as being a snooker hall. However none of these uses is considered potentially contaminative therefore the risk assessment would not be significantly affected.

The primary reason for recommending the condition was the former lead mining history of the area and potential for lead mining related contamination to be present. While the report makes brief reference to this former activity it surmises on p9 that they do not consider the local mining to be a source of contamination based on the distance from the site to any former mine and there being no evidence of mining/quarrying spoil utilised as fill within the vicinity of the site (although it is noted that item 4 of the walkover checklist observed a depth of fill).

The walkover checklist (provided in Appendix A) does not accurately indicate under item 12 the proximity of former quarries to the site. There is a quarry c. 188m to the south east and another c. 300m to the west – both believed to be former lead mines.

Other assessments in the area have found land contamination from lead mining activities to be more widely present than historical mapping would otherwise indicate and we do not agree with this conclusion that lead mining related contamination is unlikely to be present. As mentioned this is the reason for the condition and therefore this will need to be fully assessed.

3. The walkover and Groundsure report is over 3 years old and there is no recognition of this and explanation of whether there have been any changes to the site since then.
4. Item 2 on the walkover checklist states there are no watercourses within 500m of the site, however the River Clywedog is c. 310m to the west.
5. The Groundsure report appears to have been corrupted, this should be re-sent.
6. The report concludes that an intrusive investigation to establish ground type and groundwater level is recommended. They propose trial pits to collect samples for contamination testing (including asbestos) to be collected, however no detail on the location of the trial pits and depths of samples is provided.

It is noted that demolition waste is present across the site, although I understand construction works have commenced on site and therefore some of this may have since been removed/moved. The land contamination assessment should not focus on the demolition waste if this is to be removed from site (although testing for waste removal requirements will be necessary).

Geotechnical Design Report

I have the following comments on the geotechnical report, as before my comments are only in relation to the contamination assessment and not geo-technical matters.

7. Although the desk study refers to risks to future site users from soil exposure, only one of the four trial pits is positioned in a garden, two are in the parking/access road and the other is under the building footprint. To assess exposure risks to the residents from contamination associated with former lead mining activities the main exposure risk would be when residents are using their gardens, therefore the sample locations should have primarily been positioned in the proposed garden areas.
8. No trial pit logs have been provided and it is not clear which trial pits had made ground present (to a depth of 0.5m bgl) – the report states 2 of the 4 trial pits had made ground.
9. Six samples were collected and tested, 3 were from trial pit 1 at depths of 0.5m, 1.4m and 1.8m. 1 was from trial pit 2 at a depth of 0.9m, trial pit 3 also had a sample from 0.9m bgl and trial pit 4 the sample was taken from 1.0m bgl. With the exception of the sample from 0.5m (which was in the access road) none of the samples are considered

to be near surface or shallow to be sufficiently representative of the likely exposure zone.

10. It should be noted that some SGVs are withdrawn and further details on the SIRIUS GAC trigger levels needs to be provided to establish whether these are appropriate authoritative assessment criteria. Notwithstanding this the risk assessment of the soil tests is insufficient to assess the significance of potential pollutant linkages to the proposed end users due to the inadequacy of the soil samples collected.
11. It was stated in the desk study that asbestos would be tested for however there are no results provided for this.

Until the matters listed above are addressed I **cannot** recommend the discharge of condition 3 of planning permission P/2017/0500. It is also not yet possible to recommend discharge of Condition 4 until it is known whether remediation is required – if it is then the remediation works will need to be completed and inspected and a verification report prepared for approval by the Council to enable discharge of Condition 4.

A handwritten signature in black ink, appearing to read 'Angela Guy', with a stylized flourish at the end.

Angela Guy
Contaminated Land Officer