

Cerys Jones

From: Matthew Phillips
Sent: 04 August 2016 15:46
To: planning_admin
Subject: FW: P/2016/0602 - Croesnewydd Road, wrexh

Public Protection comments to the above.

From: Angela Guy
Sent: 03 August 2016 16:05
To: Matthew Phillips
Subject: RE: P/2016/0602 - Croesnewydd Road, wrexh

Matthew

Yes it is fine to discharge Condition 3. As you'll be aware, Condition 4 should only be discharged once we have received and approved a Validation Report.

Regards Angela

From: Matthew Phillips
Sent: 03 August 2016 15:54
To: Angela Guy
Subject: RE: P/2016/0602 - Croesnewydd Road, wrexh

Angela,

On the basis of your email below, can you confirm that I am now able to approve the details submitted in respect of condition 03?

Regards

Matthew

From: Angela Guy
Sent: 03 August 2016 15:53
To: Marc Fawcett
Cc: Kevin Williams; Stuart Andrew; Matthew Phillips
Subject: RE: P/2016/0602 - Croesnewydd Road, wrexh

Hi Marc

Sorry for the delay in responding. I can confirm that the responses you have provided are sufficient.

Regards Angela

From: Marc Fawcett [<mailto:marcfawcett@betts-associates.co.uk>]
Sent: 01 August 2016 16:25
To: Angela Guy
Cc: Kevin Williams; Stuart Andrew
Subject: RE: P/2016/0602 - Croesnewydd Road, wrexh

Hi Angela

Sorry to chase – any feedback on this yet?

If you have any queries please do not hesitate in giving me a call.

Best Regards

Marc Fawcett BSc FGS MIAEG
Director

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From: Marc Fawcett
Sent: 19 July 2016 12:25
To: 'angela.guy@wrexham.gov.uk'
Cc: Kevin Williams; 'Stuart Andrew'
Subject: RE: P/2016/0602 - Croesnewydd Road, wrexh

Hi Angela

Stuarts passed me your comments to review.

I've used your letter and commented in red below each item for clarity.

Hopefully this will make sense. Please do not hesitate in giving me a call to discuss if not.

Best Regards

Marc Fawcett BSc FGS MIAEG
Director

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P/2016/0602 (Tascomi 278/16)

Having reviewed the Build Phase Development Remediation and Validation Strategy dated May 2016 (version draft for comment) prepared for Macbryde Homes by Betts Associates I have the following comments to make.

1. I am aware of the past reports prepared by WSP and Listers and note that Betts Associates also carried out some further investigation in 2011 which delineated the arsenic hotspot and concluded no remediation of this area was necessary. However, it appears that works and activities undertaken since then have identified potential contamination concerns that require further assessment. These are:
 - a. The presence of 4 stockpiles on the site (3 of which are believed to be fly-tipped materials).
 - b. Visual and olfactory contamination detailed in section 5.3 of the Betts Associates Geotechnical Report dated March 2016.

Fly tipped material is within isolated stockpiles (plaster / wood / brick) –
ACTION these will be removed prior to site start up with photographic evidence.

When reviewing the visual / olfactory table the only items identified close to surface <300mm (i.e. of concern to human health risk) are:

Exploratory Hole	Depth (mbgl)	Strata	Remark
TP607	0.10 – 1.60	MADE GROUND	Occasionally ashy.
TP612	0.30 – 3.30	MADE GROUND	Rare ashy pocket. Hydrocarbon odour.
TP624	0.10 – 1.30	MADE GROUND	Occasionally ashy.

TP607 is under proposed road way so of low risk.

TP612 is on the edge of the site – **ACTION** we will include for additional supervision and testing in this locality and 600mm cover in the vicinity – 4 samples and hand dig may suffice to delineate.

TP624 – levels are to be increased in this locality – given that topsoil / subsoil is required perhaps easiest to allow for 600mm in this locality. We have trial holes either side showing nothing evident **ACTION** so reasonable approach 600mm opposed to 300mm for these 3 gardens on physical unsuitability grounds.

2. I note that the substation is now demolished and a previous report had said the ground would require assessment once this work had been done, has this been undertaken?

Substation removed during our supervision of earthworks. Sub was of concrete prefab construction with integral floor with no evidence of spillage / oil filled transformers. Soils beneath the slab were

excavated into to check for visual / olfactory evidence of contamination and former foundations – nothing encountered. Risk deemed low. **ACTION** – will be mentioned in Remstrat for clarity

3. The Betts Associates Geotechnical Report dated March 2016 states in section 4 that remediation has been carried out, however no details of this work have been provided either in this report and other information I have been provided with over the years does not detail what this is either. Further details of this need to be provided.

'Remedial works' were of an earthworks nature as no contamination had been identified other than the arsenic hotspot which was resolved and documented with WBC. The work comprised 1) excavation of limestone boulders from a former pond / crushing on site to provide aggregate 2) excavation and levelling / compacting of the mound of Stoney cohesive soils previously tested by WSP for contamination status – proved clean. **ACTION** – will mention this in the rem strat as an introduction. Report attached for information

4. Details of the levelling works should be provided in the context of what material was moved where and whether this will have altered the findings of the previous contamination assessments undertaken. I note that a report was prepared in June 2013 'Earthworks Completion Report' and presume this provides details of the levelling work undertaken and would request that a copy of this report is provided.

As above – report can be issued but its geotechnical opposed to contaminative. The scope of works undertaken did not change the contaminative nature – but did give greater confidence in that no significant contamination was present on site (we had a watching brief during the works and oversaw the works) and that site is now covered by a known tested material from the mound (all greater than 600mm – with possible exception around the eastern edge TP612 where access was restricted – edge of where the pond was but on the boundary of adjacent land owner). It is also worth noting that all the infilled pond features were fully excavated and nothing other than limestone boulders were found (crushed for reuse as road aggregate – one of the stockpiles on site) reducing the risk of unforeseen contamination.

5. The previous gas risk assessment by WSP is 10 years old and new authoritative guidance is now available that should be followed, in addition consideration of whether the levelling works has altered the ground gas regime should be provided. I note in section 2 of the Strategy that this matter has been addressed in relation to current radon guidance however the landfill gas risk assessment has not been reviewed in light of recent guidance on this. It should be noted that if landfill gas protection measures are required, and even if they are combined with radon protection measures, then the validation process for this needs to include inspection of membranes installed at each plot to ensure the installation has been satisfactory.

Agree gas data is out of date but the historic data is probably deemed worst case scenario as any source on site has been ever decreasing. Using the background wsp data and review of what materials have been encountered no significant changes are anticipated. Whilst it could be argued that the earthworks could have generated some gas release (the material was stoney cohesive so low biogenic gas source risk and less than 3m thickness) the fact that radon protection is to be provided more than adequately satisfies low gas concentrations possible.

6. Section 3 refers to the need to validate imported soils, it is noted that the soils are for a planting medium and not to provide a clean cover system (at least at this stage, but this is subject to the assessments still required as detailed in these comments). I have provided guidance on testing of imported soils which should be followed. Should any unforeseen contamination be identified during the development works then this needs to be assessed and documented. The Public Protection team should be notified of this and depending on the assessment findings a solution agreed on how to manage the matter if necessary.

Suggest the guidance is attached to the rear of our report for clarity

7. Once works to assess the above matters have been undertaken then the Remediation and Validation Strategy should be revised accordingly.

From: Stuart Andrew [<mailto:Stuart.Andrew@macbryde-homes.co.uk>]
Sent: 18 July 2016 11:32
To: Marc Fawcett
Cc: Kevin Williams
Subject: FW: P/2016/0602 - Croesnewydd Road, wrexh

Hi Marc,

Please find attached the initial comments from Angela Guy at WCBC on the Remediation & Validation Report for Croesnewydd Road. Could you please provide us with your views on the comments she makes.

Thanks,

Stuart Andrew
Design Manager
for **Macbryde Homes Ltd**
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From: Matthew Phillips [<mailto:Matthew.Phillips@wrexham.gov.uk>]
Sent: 18 July 2016 11:09
To: Stuart Andrew
Subject: FW: P/2016/0602

Stuart,

Please find attached the initial comments from our Contaminated Land Officer regarding the above.

Regards

Matthew

From: Angela Guy
Sent: 13 July 2016 15:26
To: Matthew Phillips
Subject: P/2016/0602

Matthew

Please find attached my comments on the Remediation and Validation Strategy, a response from Public Protection will be with you in due course once all comments from the various sections have been compiled, my comments on a condition are as per our emails on the 28 June 2016.

Regards Angela

Ms Angela Guy

Contaminated Land Officer - Environmental Protection
Swyddog Tir wedi ei Halogi - Diogelu'r Amgylchedd



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