

Susan Davies

From: Matthew Phillips
Sent: 17 March 2016 11:03
To: planning_admin
Subject: FW: P/2015/0583 Condition 3 (P/2016/0183)

Please add as Public Protection response to P/2016/0183

From: Angela Guy
Sent: 15 March 2016 18:36
To: Matthew Phillips
Subject: P/2015/0583 Condition 3 (P/2016/0183)

Matthew

With regard to Condition 3 of Planning Permission P/2015/0583, please find below my comments on the report prepared by Ian Farmers Associates dated February 16 'Eastern Command & Custody Facility, Llay, Wrexham - Ground Investigation Report', Ref: 41788v2. Please note that the report covers geo-technical matters and foundation design recommendations, my comments do not cover these issues since they are outside my remit.

1. A phased contamination assessment should commence with a Preliminary Risk Assessment (also known as a Phase 1 Desk Study), this will then develop a conceptual model which will then be the basis for further assessment if necessary. In paragraphs 2.3.1 of the above report there is reference to a report prepared by Capita Symonds and subsequent paragraphs provide some details about a PRA so it appears that this information may be within the Capita Symonds report. Paragraph 2.3.10 refers to identified pollutant linkages and these would be encompassed with a conceptual site model. Paragraph 2.3.2 states that the land was farmland until the current building was constructed, however it is not apparent what the previous use of the building was and therefore what the potential contamination sources are from this past use. A copy of the Capita Symonds report should be provided and this will then be reviewed to establish if the matters raised here are addressed.
2. It is noted that a gas risk assessment has been carried out and some potentially significant risks have been identified and the report surmises that these are likely to be associated with the presence on peat/marshland. It is also noted that paragraph 2.3.9 states that basic radon protection for properties would be required in this area, although it is not clear whether this type of development meets this requirement. I do not have any specific comments with regard to the scope of the gas risk assessment and findings other than there is limited discussion on the influence of the atmospheric pressure at the time of the monitoring.
3. The report refers to some localised hydrocarbon contamination (paragraph 6.7.15) but discussion on this in relation to the possible source (with reference to the PRA) has not been provided. It does not appear to be a significant issue but further comment on this, particularly in relation to the PRA, should be provided. In relation to item 5. below, the management of the contaminated water during the construction works needed to be included within the Remediation Strategy (as referred to in paragraph 6.3.2 and 6.7.15).
4. Provided that the PRA (referred to above in item 1) does not indicate any potential concerns that have not been assessed by the work undertaken in this ground investigation (or the previous one by Ian Farmer Associates), then overall I am satisfied with the assessment undertaken and the requirement to obtain specialist advice for the design of suitable gas protection measures which take into account the gas source/generation, proposed end use and foundation design.
5. A Remediation Strategy to outline the gas protection measures required and to also include protection against sulphate attack (paragraph 6.6.4) and management of hydrocarbon contaminated water should be submitted to the Council for approval. This Strategy should also provide an outline of the subsequent verification process that will be in place to ensure all remedial measures are installed/carried out to a

satisfactory standard. In due course a Verification Report will then need to be submitted detailing these checks and providing relevant evidence of the remediation measures installed/works undertaken to fulfil the requirements of Condition 4.

6. Finally I would recommend that advice is sought by the developer from NRW regarding the re-use of materials on site, a Materials Management Plan or Waste Exemption may be required.

Please do not hesitate to contact me should you have any queries.

Regards Angela

Ms Angela Guy

Contaminated Land Officer - Environmental Protection

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If I am unavailable and you require further assistance please contact Paul Sleeman (01978 297434), Stacey Inglis (01978 297435) or Helen Bradshawe (01978 297436).