

Philip Forster
Planning Control Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

Date: 4th April 2016

Dear Mr Forster,

**INSTALLATION OF SOLAR FARM (INCORPORATING PHOTOVOLTAIC SOLAR PANELS) TO
GENERATE UP TO 5MW OF POWER
LAND TO THE NORTH AND WEST OF MAELOR GAS WORKS, PARKEY LANE, MARCHWIEL,
WREXHAM, LL13 0UW**

We refer to further information received dated 23rd March 2016 concerning the above application to discharge conditions.

We acknowledge that a non-targeted grid of 30 soil samples has been taken as part of the Site investigation reported in the submitted 'PH2' report. However, no trial pit logs have been provided. This is a requirement of the checklists presented in the WLGA (2006) guidance document 'Land Contamination: A guide for developers'. Without this information it is difficult to provide comment on whether the soil sample locations are sufficient to adequately characterise the site. Reference is made to historical maps within the 'PH2' report but it is not clear whether any potential contamination sources identified in these maps influenced the sampling strategy/design.

Additionally, we note that BS10175:2011(British Standards: Investigation of potentially contaminated sites – code of practice) is referenced within PH2. BS10175 states that soil samples should be taken at surface, every 50cm in depth and at every change of strata. The Chemtest data provided to us suggests that only one sample per trial pit was taken at 15cm bgl despite trial pits extending to ~2m bgl. Whilst there may be justification for this, without trial pit logs/observations or discussion of sample depth within the 'PH2' report it is not possible to comment on adequacy of the Site investigation. Furthermore, the 'PH1' report identified "fuel oils"/"hydrocarbon" compounds as a potential contaminant of concern at the site yet the Chemtest data supplied (carried out as part of the Site Investigation) does not show that hydrocarbons were ever analysed for. The justification for this is unclear.

In relation to the following statements made within the letter dated 22nd March from 'The Magnificent Science Company' to Wrexham CBC:

- ***"As there is no plausible source with a significant soluble component...."***

We would agree that no source of significant concern has been identified (based on the sample locations tested), however, for the aforementioned reasons we cannot comment on whether the

site has been adequately characterised. Additionally, it is not clear on what basis comments in relation to a 'soluble component' are made since there does not appear to be any leachate analysis/testing or perched/groundwater analysis. The chemtest data we have received relates only to solid soil analysis.

- ***“While compliance point solute transport modelling can be conducted, it is obvious that with the small exceedences on the site, this would conclude that natural attenuation over 80m in soils with a very low permeability and porosity with no obvious subsurface pathway to the underlying groundwater, there is no significant residual risk.”***

The point in relation to attenuation over the 80m (to the surface water receptor) is acknowledged. However, the site overlies a Principal aquifer and is situated within a source protection zone 2. Therefore the groundwater is sensitive and should really be considered a receptor in its own right.

In summary, we would concur that a source has not been identified by the sampling that has been carried out. However, as outlined there is insufficient information in order to comment on whether that sampling is adequate and has fully characterised the site in terms of potential for historic contamination (other than for <15cm bgl).

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

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cc: Solar Ventures

The Magnificent Science Company Ltd.