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Andy Lewis

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Your Ref/EichCyf: 1333/JL/AG/WRS/mjs
Our Ref/Ein Cyf : JAL/P/2012/0638
Date/Dyddiad : 20th August 2013
Ask for/Gofynner am: Jackie Lewis
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E-mail/E-bost :
JackieA.Lewis@wrexham.gov.uk

Dear Alan

Desk Study Report – Erddig Nursery School, P/2012/0638

Thank you for forwarding the desk study for the Erddig Nursery School, which refers to the proposal to demolish the school and redevelop the site with six semi-detached properties with gardens. The report includes many of the details required. However, there are some matters which need further discussion.

1. Section 2.1 – It appears from the photographs that the school has been closed for some time. However, while the report states there are no signs of potential contamination, the second photograph A appears to show a large area of bare ground which has not become vegetated again. Please could you comment on this.
2. Section 2.2 and 4.0 - The report states that there is a water feature 250m to the north east of the site. It is assumed that this is a river but the report has not stated what the water quality is within the river. This information will be required.
3. Section 2.2 – The report should state what the likely direction of groundwater flow may be.
4. Section 2.3 - The 1:10000 scale maps have not been included within the report but it would be helpful to do so, as these sometimes show additional information, particularly the earlier maps. Please provide copies of these.
5. Section 2.3 - It appears that the report has omitted the presence of a foundry and tannery adjacent to brewery on the 1899 map. The foundry was present until at least 1971. The brewery became an engineering works by 1971 and was present until at least the 1990s.
6. Section 5.1 - Please note that the legislation has been amended such that the following is now the case: "significant pollution of the water environment is being caused or there is a significant possibility of such pollution being caused".
7. Section 5.2 – The report states that there are low levels of asbestos within the school buildings and that demolition will be undertaken in accordance with published guidance. While it is

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not the Council's remit to ensure that the asbestos is removed safely during the demolition process, it would be useful to provide evidence within the intrusive site investigation report, that this is undertaken in the correct manner, so as to show that the land does not become contaminated with asbestos from the school buildings. However, the possibility of asbestos being present in the made ground should not be discounted as such stringent measures were not applied to the demolition of buildings in years gone by.

8. Section 5.2-5.10 – It is appreciated that the conceptual ground model considers the potential risk posed by the presence of a closed landfill to the north west of the site, but consideration will also be required as to whether the activities associated with the trade entries and the other historical uses have a potential to pose a risk to the proposed development.

9. Section 5.2-5.10 – Please advise whether there are any environmentally sensitive sites which need to be considered.

10. Section 5.3 – The pathways should include inhalation of dust tracked back into house as well as wind blown dust.

11. Section 5.5 – Please note, there appears to be a typing error with regards to the name of the solid geology beneath the site which should read the Etruria Formation.

12. Section 5.5 – In discussing the potential for ground gas to migrate through the glacial sand and gravel deposits, the elevations of the two sites do not appear to vary that greatly according to the details provided in Sections 2.1 and 2.3. I would suggest the levels and thicknesses of the glacial deposits between the two sites are more likely to have an influence on the potential for gas migration, as this will influence whether these are in continuity or not. If the site is situated at a lower elevation then carbon dioxide would be more likely to migrate towards it as carbon dioxide is denser than air. However, I accept the other factors which are likely to reduce the likelihood of any potential landfill gases migrating from the closed landfill to the proposed development site, including the installation of gas protection measures, assuming that the radon measures are sufficient for the remediation of carbon dioxide.

13. Section 5.2-5.10 - The conceptual ground model goes some way to identify sources of contamination. However, this needs to detail the actual potential contaminants that may be present as a result of the source. The model also needs to identify the potential linkages between the contaminants and receptors and the potential level of risk associated with them. This should be in a clear format such as a table and possibly diagram. This provides clarification as to the analysis required during the intrusive site investigation.

14. Section 5.8 – The report states that it is likely that topsoil will need to be imported to site as part of the development. It correctly states that this will require verification to ensure that it is not contaminated. May I draw your attention to the Welsh Land Contamination Working Group's 2013 guidance document "Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems", which I have attached to this correspondence. Wrexham Council are referring to this guidance for all new developments and encourage consultants and developers to follow this. Should imported soils form part of this development, we would require a completed "Imported Materials Declaration Form", as referred to within the Guidance document, to clarify the sampling frequency and analytical requirements.

15. Section 6.0 – Please advise what analysis is proposed when undertaking the intrusive site investigation, in order to identify potential contaminants. I would recommend that this is agreed prior to the investigation.

Should you have queries regarding the above, please do not hesitate to contact me on the above number. I look forward to receiving your response.

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We aim to provide our service fairly and we monitor our services to check we are meeting this standard. To help us do this I would be grateful if you would visit the following link <http://www.surveymonkey.com/s/ppequalitymonitoring> and complete the equality questionnaire, which will only take about 2 minutes of your time. Note that this questionnaire is anonymous.

Yours sincerely



Jackie Lewis
Contaminated Land Officer

Cc Sharon Holman, Planning Officer, Wrexham County Borough Council

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