

MEMORANDUM



From: Stacey Inglis
Contaminated Land Officer

To: David Williams
Planning Control Manager

Our Ref: P/2021/0494

Your Ref: P/2021/0494

Date: 15 July 2021

**No. of
Pages:** 4

TOWN AND COUNTRY PLANNING ACT 1990

RE: P/2021/0494 – DISCHARGE OF CONDITIONS 04 (DRAINAGE), 06 (CONTAMINATION), 12 (CONSTRUCTION TRAFFIC MANAGEMENT), 13 (LANDSCAPING) AND 18 (LANDSCAPING MAINTENANCE) OF PLANNING PERMISSION P/2020/0603

UNIT 6 PACIFIC PARK BRIDGE ROAD NORTH WREXHAM INDUSTRIAL ESTATE WREXXHAM

The following additional information has been submitted for the discharge of condition 6 of planning permission P/2020/0603.

- Email from E3P in response to memorandum of 11 June 2021. Dated 29 June 2021.
- E3P, Remediation and Enabling Works Strategy, Pacific Park, Wrexham. Reference: 14-255-R4-1. Dated July 2021.

The additional information has been reviewed in conjunction with the previous reports submitted in support of planning permission P/2020/0603.

- E3P, Phase I Geoenvironmental Site Assessment, Proposed Industrial Development, Pacific Park, Wrexham. Reference: 14-255-R1-1. Dated July 2020
- E3P, Phase II Geoenvironmental Site Assessment, Proposed Industrial Development, Pacific Park, Wrexham. Reference: 14-255-R2-1. Dated May 2021.

I have the following comments to make, I trust that these will be forwarded to the appropriate person(s). Please note that I have not provided comments on the geotechnical assessment within the report as it is not within the remit of the Contaminated Land Team.

Email from E3P in response to memorandum of 11 June 2021. Dated 29 June 2021.

Please note the numbering follows that of my previous memorandum dated 11 June 2021.

1. Section 2.2 – Confirmation has been given that additional works will be undertaken and a watching brief during the remediation works. Specific details are provided within the Remediation and Enabling Works Strategy, please see below for any comments.
2. Section 4.2 (Non-volatile PAH) – Specific details are provided within the Remediation and Enabling Works Strategy, please see below for any comments.
3. Section 4.2 (SVOCs) – No further action required.
4. Section 4.2 (PCBs) – In light of my comments further discussion of PCBs is undertaken within the Remediation and Enabling Works Strategy, please see below for comments.
5. Section 4.2 (Asbestos) – Further details are provided within the Remediation and Enabling Works Strategy, please see below for comments.
6. Section 4.3.2 – No further action required.
7. Section 4.4 (Ground Gas) – I look forward to receiving the ground gas addendum in due course.
8. Section 4.3 (Potable Water Supply) – A satisfactory response has been received and I look forward to receiving the water pipeline risk assessment in due course.
9. Section 5.13 – It is noted that details of these works are summarised within the Remediation and Enabling Works Strategy, please see below for any comments. Please note that once these works are completed they should be submitted to the Planning Department for written approval as an addendum report not within the validation report.
10. Topsoil is to be imported to site – Details are provided within the Remediation and Enabling Works Strategy, please see below for comments.
11. Material to be removed from site – A satisfactory response has been received.
12. A site remediation and enabling works strategy – Has been submitted, please see below for comments.

E3P, Remediation and Enabling Works Strategy, Pacific Park, Wrexham. Reference: 14-255-R4-1. Dated July 2021.

The above report was comprehensive and I can confirm that I am in agreement with the proposed remedial strategy, however I have the following comments to make:

- a) Section 2.3 & Section 3.4.3 (PCBs) – It is stated that a clean cover system will be used in soft landscaping areas, with the remainder of the site being under concrete hardstanding, and that a threshold of 20mg/kg will be utilised for soils across the development. This was based on additional information provided by the Council on previous works undertaken on the industrial estate with regards to PCBs. However, it

was agreed in an email to EP3, dated 14 July 2021, that a threshold value of 7.2mg/kg was going to be used on site.

Please can you clarify which threshold value is going to be used and how it is going to apply to the proposed remedial works?

Due consideration should be given to the fact that the original PCB remedial works using a threshold of 20mg/kg were undertaken in 1987 and that more recent works undertaken on the industrial estate developed a SSAC of 7.2 mg/kg for PCB Acrolor 1254.

Is it proposed that any material that is found to have <20mg/kg will be left in situ? Is it your intention to further delineate WS101?

It is also stated that if PCBs are identified above the threshold value of >20 mg/kg (still to be agreed) then the material will either be disposed of off-site or placed in an area of low sensitivity. Should PCBs be identified above the threshold value then the Council should be informed and detailed written justification for the proposed option, off-site disposal or remaining on-site, must be submitted for written approval.

- b) Section 2.5 – It is proposed that the development will require Characteristic Situation 2 gas protection measures, I cannot agree until a copy of the Ground Gas Addendum Report is submitted to the Planning Department for written approval.
- c) Section 2.6 – Due to the proposed enabling works at the site resulting in materials being utilised in different areas I am in agreement with the proposed use of barrier pipe, it is noted that confirmatory sampling will be undertaken during the remediation and enabling works. The results of this sampling and confirmation of the type of pipe installed must be included within the validation report.
- d) Section 3.4.1 Cover System – I am in agreement with the proposed cover system in soft landscaped areas.
- e) Section 3.4.2 (Asbestos) – I am in agreement that the identified hot spots of asbestos, WS101 and TP108, should undergo further delineation and removal. This work should be undertaken by an appropriately qualified contractor, details of which should be submitted to the Planning Department.

It is noted that no visible ACM has been found during the site investigation works, however should this change during the remediation and enabling works and it is found that asbestos is more widespread than anticipated then the Planning Department should be notified and details provided to demonstrate how it will be remediated on site and by whom, i.e. will an approved contractor be appointed.

Should off-site disposal be required then copies of all waste transfer notes must be provided with the validation report demonstrating that it has been appropriately disposed of.

- f) Section 3.7 (Supplementary Site Investigations) – I am in agreement with the proposed additional works in the area of the former infilled pond and in the area of the

concrete slab in the south of the site. I look forward to receiving the results of the supplementary site investigation in due course.

- g) Section 3.9 – The Council should be notified when a remediation contractor has been appointed and copies of the method statements should be provided.
- h) Section 6 – I have not provided comments on this section as it is not within the remit of the Contaminated Land Team.

Please note that I cannot recommend the discharge of condition 6 until all the information, detailed above, is submitted and a copy of the Ground Gas Addendum Report be submitted to the Planning Department for written approval. Should you have any queries regarding the above then please contact me on Ext. 8773.



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Dave Sharp
Building Control Lead