

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Simon Greenland
Planning Officer

Our Ref: P/2021/0149

Your Ref: P/2021/0149

Date: 09 March 2021

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TOWN AND COUNTRY PLANNING ACT 1990

P/2021/0149 – DISCHARGE OF CONDITION 5 (CONTAMINATION VERIFICATION) OF PLANNING PERMISSION P/2020/0598 94 REGENT STREET WREXHAM

As advised at the end of January, I've reviewed the Ground Investigation Report prepared by Core Geotechnics Ltd, dated 20/10/20 and my initial comments in relation to Condition 5 are as follows:

The preliminary site investigation has identified hydrocarbon contamination in the soils and groundwater, the most significantly impacted areas are WS03 and WS04 (away from the fuelling area) based on the investigations to date. It is noted water monitoring installations were not installed in these two areas and therefore on going water monitoring of these positions has not been possible. Potential off site sources have been indicated as the possible cause, although some hydrocarbons were also identified in the fuelling area and this too remains a potential source.

Following is an extract of text from Section 7.10.2 (I think this should be 7.7.2) of the report. I am in agreement that further investigation of the identified hydrocarbon contamination is required and should this report be submitted for discharge of Condition 5 then I would recommend that the condition not be discharged until further risk assessment works are completed to the satisfaction of the Council and, if required, a Remediation Strategy agreed.

“Results suggest that groundwater is impacted with TPH. It is not clear whether the impacted groundwater has resulted from leakage or spillage from the above (or now redundant below ground tank(s) on site) or relate to historical leakage from an off-site source (such as the former petrol filling station and historic oil tanks 60-64m to the northwest). Given that the two installed wells (WS01 and WS02) which span the location of the diesel tanks only showed very low levels of TPH, whereas WS04 located closer to the western boundary show significantly higher levels of TPH and

may implicate the former petrol filling station or historic oil tanks located off site as the source.

Further investigation including installation of additional monitoring wells is likely to be required to establish the source of the TPH, contaminant plume, boundary conditions and to enable a detailed groundwater quantitative risk assessment (QRA) to be carried out."

Please also note that I am in agreement with the removal of the fuel tanks (above and below ground) and further investigation and remediation (if found to be necessary) around these areas.

At this time I cannot wholly concur with the conclusion that risks to human health are not considered to be present in relation to the proposed end use of the site since the proposed extension is in the area of WS03 and WS04 and potential vapours could impact the new building depending on their significance, although remedial measures can be taken to mitigate this risk (if present).

In undertaking further risk assessment the consultant should bear in mind that Welsh Government has a policy statement on the use of C4SLs for planning and also that ratification of assessment criteria by NHBC may not concur with a regulators approach.

Depending on the significance of the controlled waters contamination it is possible consultation with NRW may be required and/or the Contaminated Land Team may seek the advice of NRW ourselves. In lieu of this being potentially significant the consultant may wish to consult with NRW before further investigation works commence.

It may not be a priority area for NRW, however Louise Siddorn has now been appointed as Contaminated Land Specialist Advisor within the Geoscience team at NRW for the NW and she will be able to advise further, louise.siddorn@cyfoethnaturiolcymru.gov.uk . Liaison with the Contaminated Land Team on the scope of site investigation works ahead of any on site works commencing on site is also welcomed.

Since that time I've been made aware of the further controlled water risk assessment works that are being undertaken, in early February I provided informal advice on the proposals, prepared by Mott McDonald, as follows.

Core Geotechnics identify the underlying superficial deposits and bedrock as Secondary A Aquifers of high vulnerability. The site investigation works should be designed such that no further contamination of the groundwater is caused as a direct result of the investigation and remediation works i.e. installation of the boreholes. In addition, this does not appear to have been considered as a receptor.

2.5.5 of the report states that each well will be monitored on completion and again after 2 weeks. It should be noted that authoritative guidance indicates that water samples taken on the day of a well installation are not typically representative of the groundwater conditions due to the disturbance that has taken place, although they may provide an indication of possible conditions.

The water sample from WS4 was taken from the drilled borehole, not a monitoring well and this sample cannot be relied upon to be representative of groundwater conditions in that location. This should be borne in mind if it was intended to use the data

alongside the additional data that will be collected from the new wells for the further risk assessment work.

2.5.1 states "As can be seen from Table 2.1 the concentrations of petroleum hydrocarbons required to present a significant risk to site occupants from vapour inhalation are very high. These concentrations would require the soil to be saturated with product and so it can be assumed that if free phase product is not present in soil, there is no significant risk from vapour inhalation." Whilst this may be the case, the risk from vapours in groundwater will still require assessment once monitoring data has been collected.

It is stated in 2.5.2, 2.5.3, 2.5.4 and 2.5.5 that excavations will be verified through visual inspection of the base and sides to verify that there is no free phase product remaining within the soil. Visual inspection alone is not normally sufficient, testing of the excavation walls and base and use of PID may also be needed, particularly if controlled water risks are found to be significant.

It is stated in 2.5.5 "The remedial strategy for groundwater contaminated with hydrocarbons is source removal. The monitoring wells will be used to monitor groundwater quality before, during and after the construction work. At present it is envisaged that the boreholes would be installed as soon as possible and then groundwater quality monitored fortnightly with a review after three rounds. An interim report would be submitted to the planning authority discussing the results and implications for the site." This approach is acceptable on the understanding that the interim report will provide revised remediation proposals if required, assuming these can be identified at that time, otherwise this would be provided following further monitoring.

I note that the 'Discharge of planning conditions relating to contaminated land' report prepared by Mott McDonald dated February 2021 submitted with this discharge application is the document referred to above and which I have commented on.

As the further controlled water risk assessment works are not yet complete and revisions to the initial Remediation Strategy may yet be required, I cannot yet recommend the discharge of condition 5.

Should you have any queries regarding the above then please contact me on Ext. 8771.

A handwritten signature in black ink, appearing to read 'Angela Guy', with a stylized flourish at the end.

Angela Guy
Contaminated Land Officer