

MEMORANDUM



From: Stacey Inglis
Contaminated Land Officer

To: David Williams
Planning Control Manager

Our Ref: P/2020/0636

Your Ref: P/2020/0636

Date: 13 November 2020

**No. of
Pages:** 5

TOWN AND COUNTRY PLANNING ACT 1990

RE: P/2020/0636 – DISCHARGE OF CONDITION 7 (CONTAMINATION) OF PLANNING PERMISSION P/2018/0675

FORMER DIVISIONAL POLICE HEADQUARTERS BODHYFRYD WREXHAM

Further to my memorandum dated 29 October 2020 the following reports have now been submitted for the discharge of condition (7) of planning permission P/2018/0675:

- Remada Ltd, Phase 1 Site Investigation, Lidl Bodhyfryd, Wrexham. Dated July 2017
- Brownfield Solutions Ltd, Geo-Environmental Assessment Report, Lidl UK GMBH Wrexham Police Station. Dated December 2017
- Brownfield Solutions Ltd, Gas Assessment Letter Report. Dated 28 June 2018
- Remada Ltd, Supplementary Phase 2 Ground Investigation, Lidl Bodhyfryd, Wrexham. Dated April 2019

Having reviewed each of the above reports I have the following comments to make, I trust that these will be forward to the appropriate person(s). For ease of reference I have provided comments on each individual report, however it is acknowledged that they may be superseded by later reports.

Please note that I have not provided comments on the geotechnical aspects of the reports as this is not within the remit of the Contaminated Land Section:

- **Remada Ltd, Phase 1 Site Investigation, Lidl Bodhyfryd, Wrexham. Dated July 2017**

I am in agreement with the conclusions and recommendations within the phase 1 site investigation and that a phase 2 intrusive site investigation is required.

- **Brownfield Solutions Ltd, Geo-Environmental Assessment Report, Lidl UK GMBH Wrexham Police Station. Dated December 2017**

1. Section 4.2.1 to 4.2.3 – It is noted that the former historic timber yard in the north west section of the site has not been detailed within the potential sources of contamination, and neither has the commonly associated contaminants from this former use been identified. Please can you provide full justification for why the timber yard has not been included?
2. Section 4.5 – The preliminary conceptual site model does not include the timber yard as a potential source and neither does it consider made ground as a potential source of ground gas. Please can you provide full justification for why they have not been included?
3. Section 4.6 – Please refer to my comments on the ground gas assessment that are detailed under the Gas Assessment Letter Report response below.
4. Section 5.4 – Please can you provide further justification for why only 5 samples were sent for chemical analysis? This is very limited sampling given the size of the site and the number of window samples and trial pits that were undertaken. Furthermore, what is the justification for the chosen sample suite, it is noted that the samples were not tested for petroleum hydrocarbons, BTEX or PCBs although there were sources identified on the site that may have caused such contaminants to be present?
5. Section 5.5 – Please refer to my comments on the ground gas assessment that are detailed under the Gas Assessment Letter Report response below.
6. Section 6.1.1 – It is stated that made ground ranges between 0.5m and 2.4m bgl and was highest in the raised embankments, however it was noted in the exploratory hole logs that the total depth of made ground was not established in TP01, TP02 and WS04. How can you be certain that the depth of made ground in these areas is not greater than 2.4m bgl?
7. Section 7.1 – It is stated that none of the sample results contained any contaminants above residential screening values, however the actual screening value used has not been stated. It is acknowledged that there is a discussion within Appendix G regarding the contaminated land screening values but it does not state what actual values the results have been compared to. This is an absolute requirement and should be included within the report.
8. Section 7.3 – Please refer to my comments on the ground gas assessment that are detailed under the Gas Assessment Letter Report response below.
9. Section 9.3 – Whilst it is acknowledged that the sample results have not shown any elevated levels of contaminants to date, there remains several outstanding queries in relation to the identified sources, sampling methodology and analytical sampling suite chosen that need to be addressed before I can be satisfied that the risks from contaminants to future site users is low. The qualitative risk assessment therefore may need to be amended dependant on the response to these queries.
10. Section 9.3 – It is noted that the electricity substation is no longer in the conceptual site model, why is it no longer being considered as a potential source of contamination given that no assessment of this has taken place?

11. Section 9.3.4 – I am in agreement that the diesel generator will need to be investigated as a potential source of contamination, however as made ground is present on site I do not think you can be certain that the only potential migration pathway is vertical. Lateral migration pathways should be considered. It would be useful to have some further information regarding the diesel generator, what size was it, how much diesel did it hold, how was it decommissioned, to include photos if possible?
12. Section 9.4 – I cannot provide any comments on the remedial measure section of the report until a satisfactory response to the above items has been received and approved in writing by the Council.
13. Section 10.1.1 – As discussed in Item 9 I am not in agreement that the risk to site users is low. This is in part due to the outstanding queries detailed above, and that further site investigation works are required (e.g. diesel generator and electricity substation).
14. Section 10.1.2 – Please refer to my comments on the ground gas assessment that are detailed under the Gas Assessment Letter Report response below.
15. Section 10.1.3 – I am in agreement that an investigation is required in the area of the diesel generator and tank.

• **Brownfield Solutions Ltd, Gas Assessment Letter Report. Dated 28 June 2018**

All gas risk assessments should be undertaken in accordance with current best practice and authoritative guidance, such as CIRIA C665. Having considered the gas assessment in conjunction with the Geo-environmental Assessment Report I can provide the following comments:

16. The reports identified potential off site sources of ground gas relating to three landfill sites located at least 500m from the site and stated that there were no on-site sources of ground gas identified with the exception of localised made ground. It appears that this made ground has then been discounted as a potential source. Please can you provide a comprehensive explanation of why the made ground on site does not warrant further consideration / assessment? This explanation should take into account the ground conditions that have been found during the site investigation works, such as depth and type of made ground identified.
17. No explanation has been provided within the reports for the number and location of monitoring wells and for the chosen response zones. It is noted that WS10 targets both made ground and natural strata and WS03 and WS12 targets natural strata. Please can full justification be provided also taking into account the issues raised in Item 16.
18. There has been no explanation of the chosen monitoring schedule and why four visits over 10 weeks is sufficient, especially given that none of the gas monitoring visits were undertaken during a period of falling pressure. This must be provided.
19. It has been concluded that the ground gas levels recorded place the site within 'characteristic situation 1'. I cannot confirm that I am in agreement with this assessment,

based on the information that has been provided to date, as further explanation and justification is required, please refer to Items 16, 17 and 18 above.

20. Finally it was noted within the Supplementary Phase 2 Ground Investigation (Remada, 2019) that the redevelopment of the site is likely to include cut and fill works to provide a suitable development platform, due consideration should be given to how these works may impact any potential ground gas on the site.

- **Remada Ltd, Supplementary Phase 2 Ground Investigation, Lidl Bodhyfryd, Wrexham. Dated April 2019**

21. Section 3.4 and 5.4 – Please refer to my comments in Items 16 to 20 above regarding the gas assessment that has been undertaken on site.
22. Section 3.1 and 3.6.1 – It is noted that the supplementary investigation was targeting the area of the site in close proximity to the former fuel storage area/substation and the chemical sample suite chosen reflects this, however there has been no discussion within the report about the former timber yard to the north west of the site and whether the previous investigation was sufficient to assess this (consider Items 1 and 2 above). Please can you provide a detailed explanation regarding the sampling strategy and why only 5 samples tested for metals and inorganics in the original investigation and 6 samples tested for PAH, speciated TPH and BTEX is sufficient to characterise the contamination status of the site based on its historic use? This explanation should be reflected in the revised conceptual site model (table 5).
23. Section 7.1 – I am in agreement that to date no contaminants have been found at concentrations that exceeded human health generic assessment criteria, however there is still some uncertainty regarding the area of the site that contains the diesel generator/substation. It is acknowledged that some samples have been taken in close proximity to the building where these are stored but there has been no discussion within the report about how they will be decommissioned and any subsequent testing that may be required within the footprint.

There is the potential that spillages/leaks may have occurred beneath/around the diesel generator and this will need to be investigated post removal. Please can further information be provided regarding the size and capacity of the diesel generator and also the size of the substation? Furthermore, details of how they were removed prior to the recent demolition works should be provided, it would be useful to have some photos if available, and any observations that may have been made, such as was there any staining indicating spillages?

I cannot agree that no remedial works are required until a satisfactory response has been received to the items above.

Please note that I cannot recommend the discharge of condition 7 until a satisfactory response has been received and approved in writing to the outstanding issues, detailed above. Should you have any queries regarding the above then please contact me on Ext. 8773.

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Dave Sharp
Building Control Lead