

MEMORANDUM



From: Stacey Inglis
Contaminated Land Officer

To: David Williams
Planning Control Manager

Our Ref: P/2019/0900

Your Ref: P/2019/0900

Date: 09 July 2020

**No. of
Pages:** 4

TOWN AND COUNTRY PLANNING ACT 1990

**RE: P/2019/0900, LAND AT THE CORNER OF OAK ROAD AND ABBEY ROAD,
WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9RF**

The following reports have been submitted in support of the above application:

- SOCOTEC UK Limited, Volume 01: Phase 1 Report: Desk Study and Site Reconnaissance at Oak Road, Wrexham. Dated June 2020.
- SOCOTEC UK Limited, Volume 2: Phase 2 Report: Contaminated Land Assessment Factual and Interpretative Report. Dated June 2020.
- SOCOTEC UK Limited, Volume 3: Phase 2 Report: Factual and Interpretative Report. Dated June 2020.

I have previously provided comments on the following reports:

- SOCOTEC UK Limited, Volume 01: Phase 1 Report: Desk Study and Site Reconnaissance at Oak Road, Wrexham. Dated September 2019.
- SOCOTEC UK Limited, Volume 2: Phase 2 Report: Contaminated Land Assessment Factual and Interpretative Report. Dated September 2019.

Within my memorandum to the Planning Department, dated 18 December 2019, I listed a number of queries regarding the reports that were previously submitted, the consultant has not provided a direct response to these queries, alternatively amendments have been made within Volumes 01 and Volume 2 and then re-submitted dated June 2020.

For clarity I have replicated my comments from my memorandum (dated 18 December 2019) in blue, and then assessed if the re-submitted reports and Volume 3 have addressed these issues.

- **SOCOTEC UK Limited, Volume 01: Phase 1 Report: Desk Study and Site Reconnaissance at Oak Road, Wrexham. Dated June 2020.**

1. Section 10.2 – please note that I have not provided comments on the geotechnical aspect of the report as it is not within the remit of the Contaminated Land Team.

The above comment is still applicable.

2. Section 3.2 – It is stated that the rusted drum is located on the north side of the concrete service chamber (photo 4) however I cannot identify the drum in the photo, please can it be marked on the photo?

No further action required. The rusted drum has been marked on photo 4 within the amended report.

3. Section 11 – What is meant by '*dynamically sampled boreholes*'?

No further action is required.

4. With the exception of the above the information provided within the report is satisfactory and I am in agreement that further intrusive site investigation is required to refine the conceptual site model and determine if contamination is present at unacceptable levels.

No further action required.

- **SOCOTEC UK Limited, Volume 2: Phase 2 Report: Contaminated Land Assessment Factual and Interpretative Report. Dated June 2020.**
- **SOCOTEC UK Limited, Volume 3: Phase 2 Report: Factual and Interpretative Report. Dated June 2020.**

5. Section 2.2.2 – It is stated that there is a historic on site pond and on site railway sidings, please can the location of these historic features be marked on an appropriately scaled plan showing there location in relation to the sample locations.

No further action required, an historic feature plan has been included within appendix A in both volume 2 and 3.

6. Section 3.1 – Please can you provide further explanation / justification regarding the sampling methodology particularly in relation to why the historic on site pond and railway sidings were not targeted?

A satisfactory response has been received.

7. Section 3.2 – Please can you provide a detailed methodology of how the samples were taken? It is stated within the desk study that there would be 2 cable percussion boreholes and a minimum of 5 dynamically sampled boreholes? As queried in Item 3 what is meant by '*dynamically sampled boreholes*'?

A satisfactory methodology has been detailed in Volume 3.

8. Section 3.2 – Please can you provide the borehole logs and associated photos for all sample locations? There should also be included within the report a description of the type of ground encountered, e.g. depth of made ground, description of material encountered, was natural ground proven, depth of borehole / sample location, was groundwater encountered in any of the sample locations etc. This information must be provided and should have been documented within the borehole logs.

The borehole logs and descriptions of the type of ground encountered have been included within Volume 3.

9. Section 5 – It is stated that the gully will be culverted and backfilled, what will it be backfilled with? Was the gully dry during the intrusive site investigation?

A response to the above query is outstanding.

10. Section 6.3 – It is stated in the final paragraph on page 6 that '*a further tranche of C4SLs are in preparation and expected in 2017*', this should be updated to reflect that the report was written in September 2019.

No further action required as this has been updated.

11. Section 6.4 – It is acknowledged that the sources of the GACs were discussed in section 6.3, however in Table 2 it is not stated which GAC has been used for each determinand, this must be provided.

No further action required as this has been updated.

12. Section 6.5 – It is stated that the desk study showed minimal risk to controlled waters, however it was stated within the conclusions and recommendation in the desk study that the intrusive investigation would provide groundwater information for the site. Please can you provide a detailed explanation justifying why no further works were undertaken in relation to controlled waters?

The controlled waters risk assessment discussed in Volume 3 is satisfactory.

13. There is no discussion within the report of the potential risks posed from ground gases other than it being noted in table 1 in section 6.2. It was stated within the conclusions and recommendations in the desk study that the intrusive investigation would provide gas information for the site. Please can you provide a detailed explanation about why risks from ground gases have not been discussed or investigated within the report or during the intrusive works? Given that there are no borehole logs provided or any details on the depth of made ground, particularly in the areas of the pond, it is not possible to discount ground gas at this stage.

A gas risk assessment has been included within Volume 3 and is satisfactory.

14. Section 6.6 and 6.7 – It is not possible to provide comment on the updated conceptual site model or remediation recommendations until items, detailed above, have been resolved.

Please refer to Item c) and d) below.

- **Additional comments specific to: SOCOTEC UK Limited, Volume 3: Phase 2 Report: Factual and Interpretative Report. Dated June 2020.**

- a) Section 7 – Please note that I have **not** provided comments on the geotechnical engineering assessment as it is not within the remit of the Contaminated Land Team.
- b) Section 8.1.1 –Please can you provide an explanation of why PCBs were not included within the chemical analysis suite given that PCB was identified in table 9 as a potential contaminant of concern on site (due to the on site OHL tower)?
- c) Section 8 – The updated conceptual site model for the site is satisfactory with the with the exception of PCBs as a response to Item b) is outstanding.
- d) Section 8.10 – I am in agreement in principal that no specific remediation works are required based on the site investigation works undertaken to date, with the exception of PCBs as a response to Item b) is outstanding.

In summary the majority of the comments made in my memorandum to the Planning Department (dated 18 December 2020) have been satisfactorily addressed within the submitted reports with the exception of Item 9. Please can a response be provided to Item 9 and Item b) detailed above. I **cannot** recommend the discharged of condition 3 until a response has been received and approved in writing.

Should you have any queries please contact me on Ext: 8773.

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Dave Sharp
Building Control Lead