From:	andy singleton
To:	Sharon Holman
Cc:	Tony lambert; terryr19@btinternet.com
Subject:	Re: P/2020/0192 - Bryn Road, Brymbo
Date:	30 June 2020 08:53:07
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png

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Dear Sharon

Please find below responses to the issues raised by the Council's contaminated land team (memo ref: P/2020/0192, dated 25 June 2020) in relation to the above application.

I have replicated the original comments in blue text, for clarity.

1. It is noted that the development is to undergo earthworks to reduce ground levels across the site by up to 0.8m in area A and up to 1m in area B. A total of 9 trial pits were excavated across the site in areas where soft landscaping is proposed, with representative samples being taken from made ground that will remain in-situ after the development platform has been reduced. This is a satisfactory sampling methodology.

   Response: Agreed.

2. Chemical analysis results have identified elevated levels of some metals (beryllium and lead) and PAHs (benzo(b)fluoranthene, benzo(a)pyrene and dibenz(a,h)anthracene) within the made ground on the site. The chemical analysis results have been assessed against appropriate generic assessment criteria.

   Response: Agreed.

3. Asbestos screening has identified chrysotile loose fibres within a sample taken from TP04. It is acknowledged that no ACM was identified on site during the site investigation works, however please can you justify why it was not deemed necessary to determine the quantity of asbestos within the sample?

   Response: the asbestos detection was associated with a sample of Made Ground present in the east of the Site, at a location (TP04) which coincides with an area of proposed front garden. Based on the presence of asbestos fibres and also several chemical contaminants, the identified Made Ground was assessed as not being fit for use within a residential context. The resultant remedial strategy allows for the removal of all Made Ground from the front garden areas (including that in and around (TP04) to a depth of 0.4 m below the finished ground level. An anti-dig membrane is also recommended to be placed above any residual Made Ground. Given the identified risks and associated remedial proposals, additional asbestos testing (including quantification testing) was not considered to be necessary.

4. The remedial strategy proposes to divide the site into four zones (labelled Zone 1, 2, 3 and 4) and I can confirm that I am in agreement with the proposed remediation works for Zones 1, 2 & 3; however I am not in agreement with the proposed remediation strategy for Zone 4. Please can you provide justification for why no remedial works are deemed necessary in Zone 4 given that there was an exceedance of the GAC for Beryllium at TP09?

Response: The observed soils in Zone 4 were physically distinct from the surficial material encountered elsewhere on site, including the apparent absence of any man-made material. This is consistent with the known land use history of the site which includes the absence of any large structures in and around Zone 4 (it is acknowledged that possible domestic sheds appear to have been present within Zone 4 during the early to mid 1900s). It is noted that the topsoil layer within Zone 4 was of relatively modest thickness (ranging between 0.05 m and 0.35 m).

Soil sampling from TP09 identified a reasonable soil quality with only a fairly modest beryllium exceedance. In light of the overall soil quality, the known land use history (which does not flag any obvious sources of widespread beryllium contamination) and the locally thin soils, it is considered that the most sustainable remedial approach will be to retain the in situ soils whilst blending these with clean imported topsoil in order to improve the chemical and physical quality of the in situ soils (i.e., to effectively dilute the observed beryllium concentrations and increase the thickness of the growing medium).

5. Please can you provide a method statement on the earthworks detailing how the differing depths of excavation in Zones 1 to 4 will be achieved and be managed on site? It is a requirement that the validation/verification of the cover systems includes photographic evidence for each garden area (front and back) demonstrating that the required depth of clean cover has been achieved.

Response: The finished Site levels and approved building locations will be established by means of additional survey works and associated marker posts. Remedial excavations will then be performed to the requiste depths as per Figure 7.1 of report ref: 4145R1. Verification works will include both the measurement of excavations depths relative to survey points (including fixed boundary elevations) and also the measurement of imported material thicknesses, following backfilling.

6. No top soil or fill material should be imported to the site until it has been tested for contamination and assessed for its suitability for the proposed development. A suitable methodology for testing this material should be submitted to and approved by the Council prior to the soils being imported onto site. The methodology should include the sampling frequency, testing schedules, criteria against which the analytical results will be assessed (as determined by risk assessment) and source material information. This information should also be included within the validation/verification report. For further guidance please refer to: 'Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems', by the Welsh Land Contamination Working Group'. Please find attached a copy for your information.

Response: All imported materials used to make-up the garden areas (following excavation of in situ Made Ground to the required depths) will be backfilled with clean aggregate and certified topsoil (to BS3882:2015), including associated chemical analyses provided by a reputable supplier. The chemical analyses will be screened against the same Generic Assessment Criteria adopted within the recent Phase 2 site assessment report (ref: 4145R1) in order to verify the suitability for use.

The physical suitability of all imported materials will be screened on arrival at Site, including checks of the presence of any man-made material.

Verification reporting will include a photographic record of all imported material, a full description of the source and quantity of all materials used, all associated

chemical analyses (supplier-provided) and soil screening results, plus evidence demonstrating the thickness of materials placed across Zones 1 to 3.

7. I am in agreement that an anti-dig/geotextile membrane should be fitted in garden areas where made ground remains beneath the remedial excavations. Please note that the specification of the proposed anti-dig/geotextile membrane should be submitted to the Council for written approval and photographic evidence of the installation in garden areas should be included within the validation/verification report.

   Response: The following membrane will be installed over all residual Made Ground: https://www.terram.com/products/geotextiles/hi-vis-orange-geotextile.html

   Photographic evidence of the anti-dig membrane will be provided as part of the verification activities.

8. I am in agreement that all water supply pipes that may come into contact with in situ made ground should be constructed using barrier pipework. Evidence of this must be included within the validation/verification report.

   Response: Agreed.

9. Copies of the waste transfer notes should be included within the validation/verification report to demonstrate that the waste has been appropriately disposed of. The validation/verification report should be submitted to the Council for written approval.

   Response: Agreed.

I hope that the above information is sufficient, however, should you require any further clarifications please do not hesitate to get on touch.
Best wishes
Andy

Andy Singleton

Technical Director

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From: Sharon Holman [mailto:Sharon.Holman@wrexham.gov.uk]
Sent: Thursday, June 25, 2020 12:35 PM
To: 'Terry Roberts'
Subject: P/2020/0192 - Bryn Road, Brymbo

Hi Terry,

Please find attached contaminated land team response to the recent report.
Please note that there are some queries which need to be answered.

Kind regards

Sharon

Cofion/Sincerely

Sharon Holman
Swyddog Cynllunio Rheoli Datblygu / Development Control Planning Officer
Cynllunio a Rheoleiddio / Planning and Regulatory

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We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

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