

MEMORANDUM



From: Stacey Inglis
Contaminated Land Officer

To: David Williams
Planning Control Manager

Our Ref: P/2019/0877

Your Ref: P/2019/0877

Date: 11 December 2019

**No. of
Pages:** 3

TOWN AND COUNTRY PLANNING ACT 1990

RE: P/2019/0877, LAND AT OAK ROAD, WREXHAM INDUSTRIAL ESTATE

OUTLINE APPLICATION WITH SOME MATTERS RESERVED FOR PROPOSED DEVELOPMENT OF LAND FOR B1 LIGHT INDUSTRIAL AND B2 / B8 INDUSTRIAL UNITS INCLUDING MEANS OF ACCESS AND LAYOUT, ILLUSTRATIVE STRATEGIC LANDSCAPING, WITH ECOLOGICAL, HERITAGE AND AMENITY MITIGATION ZONES.

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

- Opus International Consultants (UK) Ltd, Phase 1 (Desk Study) Investigation Report, The Oaks, Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9RG. Dated March 2017
- TerraConsult Ltd, Phase 2 Site Investigation Report at The Oaks, Wrexham Industrial Estate. Report No 4292/01 Issue 2. Dated 21 May 2019

Having reviewed the above reports I have the following comments to make, please note that I have not provided comments on the geotechnical section of the report as this is not within the remit of the Contaminated Land Team.

- Opus International Consultants (UK) Ltd, Phase 1 (Desk Study) Investigation Report, The Oaks, Oak Road, Wrexham Industrial Estate Wrexham, LL13 9RG. Dated March 2017
 1. The Contaminated Land Team reviewed this report in February 2018 and was generally satisfied with the report, however it was recommended within the desk study that a detailed UXO desk study is undertaken prior to any intrusive investigation on site, please can you advise if this was undertaken?
- TerraConsult Ltd, Phase 2 Site Investigation Report at The Oaks, Wrexham Industrial Estate. Report No 4292/01 Issue 2. Dated 21 May 2019

2. Sampling strategy controlled waters
 - Please can you provide a detailed explanation / justification for the groundwater sampling and monitoring strategy and why only one round of groundwater samples were taken and sent for analysis?
 - Please can you provide a detailed explanation / justification for why no surface water sampling was undertaken at the nearest surface watercourse, The Redwither Brook, which runs alongside the site or at River Clywedog?
3. Section 9.2.3 – It is stated that the PAH and B(a)P result from HD13 is an outlier, has this been proven via statistical analysis? Furthermore, are you certain that it is not a hotspot of potential contamination that may require further delineation?
4. Section 9.2.9 – The removal of the suspected asbestos containing corrugated roof sheeting will need to be included within the verification report for the site demonstrating that the material has been removed to an appropriately licensed waste facility.
5. Section 9.3.3 – It is stated that *‘in landscaped areas the marginally elevated levels of contamination may not be acceptable for the proposed end use’* is it correct that this is in relation to flora and fauna and not to human health?
6. Section 9.4 – I have not provided comments in relation to the assessment of controlled waters as I am in agreement that discussions with NRW are required. Should NRW not take the lead with respect to the controlled waters risk assessment then I will provide comments thereafter. Please can the Council be copied into all correspondence with the NRW?
7. Section 9.6 – It is recommended that you take professional advice, from a suitably qualified person, regarding the risks to the below ground structures from the elevated sulphates identified within the groundwater. The resulting advice should be incorporated into the remediation strategy for the proposed development, outlining the concrete design and how it will be independently validated. This must be submitted to the Council for written approval prior to development works commencing.
8. Section 9.7 – I am in agreement that Characteristic Situation 2 gas protection measures are adopted for the development. The design of these measures, including drawings and the specification of the gas membrane, should be included within the remediation strategy for the proposed development. It should also include details of how the installation of the gas protection measures are going to be independently verified by an appropriately qualified third party and this verification should be in accordance with CIRIA C735. This must be submitted to the Council for written approval prior to development works commencing.
9. Section 11 – As previously stated I have not provided comments on the geotechnical assessment within the report as this is not within the remit of the Contaminated Land Team.

- **Recommended Contamination Conditions**

Due the proposed development being on former MoD land (used for the manufacture of explosives) that could result in ground contamination in some areas, it will be necessary to condition any future consent to ensure that any potential contamination issues are adequately dealt with. It is acknowledged that several contamination reports have been submitted in support of the application; however there are several issues still outstanding therefore I recommend that the following conditions and note to applicant be applied to any future consent that may be granted.

ZP01B - Contaminated Land - Phased Investigation

No development shall take place until a phased site investigation of the nature and extent of contamination has been carried out and submitted to and approved in writing by the Local Planning Authority. If any contamination is found during the site investigation, no part of the development shall commence until a scheme specifying the measures that will be taken to remediate the site to render it suitable for the development hereby permitted has been submitted to and approved in writing by the local planning authority. The site shall thereafter be remediated in accordance with the approved scheme. If during the course of development any contamination is found that has not been identified in the site investigation, no further development shall take place on those parts of the site where that contamination has been found until an additional scheme of remediation has been submitted to and approved in writing by the local planning authority for those parts of the site. The relevant parts of the site shall thereafter be remediated in accordance with the additional scheme of remediation.

WCBC02 :: ZP02A - Verification Report - Contaminated Land

Each part of the site subject to the remediation under the scheme(s) approved as part of condition @@ shall not be occupied/used until a Validation Report has been completed in respect of that part of the site and submitted to and approved in writing by the Local Planning Authority.

WCBC21 :: A11NA - SITE CONTAMINATION

Further advice on compliance with condition no. @@ may be obtained by contacting the Council's Contaminated Land Team on 01978 298870 or contaminatedland@wrexham.gov.uk. Should the investigation identify contamination issues that may affect receptors other than the site users e.g. groundwater, then it is recommended that these works are also addressed in consultation with the Council's Environmental Protection Team prior to commencement of works on site.

I look forward to receiving a response to the above items in due course, in the meantime should you have any queries regarding the above then please contact me on Ext. 8773.

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Dave Sharp
Building Control Lead