

FAO Philip Forster

21/05/2019

Dear Philip,

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

BWRIAD / PROPOSAL: Discharge of Conditions 6, 7, 9, 14 and 17.

LLEOLIAD / LOCATION: Cooperative Group Ltd., High Street, Coedpoeth, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 10/04/2019. NRW notes the information relating to the planning conditions.

We have significant concerns with this application as submitted. We do not recommend your Authority discharges condition 7 for the following reasons.

Requirement: Additional information is required in relation to the ground investigations prior to the discharge of Condition 7.

CONDITION 7 - SUBMISSION OF SCHEME TO DETAIL THE RISKS ASSOCIATED WITH CONTAMINATION

Section 7 of the Subadra 2017 Environmental assessment report makes the following recommendation:

In order to further investigate the source of the identified waste oil impact in BH4, we recommend that additional soil sampling be completed in this area of the site during the decommissioning works. In the event that localised hydrocarbon impact is identified, we recommend that additional remedial excavation of impacted soils is undertaken to remove the source of the identified impact.

We would agree with that approach and therefore recommend that land contamination conditions remain in place to provide control over this recommendation. Additionally, only one round of groundwater sampling has been submitted as part of the report. Generally, we would require at least 2 rounds in order to account for variability and errors. The hydrocarbon exceedance identified in BH4 is of concern and has not been assessed in terms of risks to the Secondary A aquifer. We would not agree (based on one round of sampling) with the following conclusion in Sec 5.2 that “no consistent groundwater table

identified under the site and therefore no active migration pathway present.”. Further evidence of this needs to be provided and/or the risks posed to controlled waters from the levels of contamination need to be assessed as per the Remedial Targets Methodology (Land contamination: remedial targets methodology (RTM) <https://www.gov.uk/government/publications/remedial-targets-worksheet-v22a-user-manual>)

We can find no details of what is proposed with the existing underground storage tanks as part of the redevelopment and also what condition they may be in. It is however noted that the 5 existing tanks are single skin and were installed prior to 1988.

Requirement: Additional information is required in relation to the ground investigations prior to the discharge of Condition 7.

We note that in relation to Condition 6 – Drainage Scheme, the Drainage Strategy states that surface water will drain to the combined sewer (ref 1436-C300). On this basis, we have no objection to the discharge of this condition.

We have no comment to make with regards to Conditions 9, 14 and 17.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales