

MEMORANDUM



From:	Helen Bradshawe Contaminated Land Officer	To:	Philip Forster Planning Control Lead
Our Ref:	HB/P/2018/0463	Your Ref:	P/2018/0463
Date:	22 June 2018	No. of Pages:	3

COOPERATIVE RETAIL SERVICES, HIGH STREET, COEDPOETH, WREXHAM, LL11 3UF

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

- Environmental Assessment Report for Petrol Coedpoeth, High Street, Coedpoeth, Wrexham, SUBADRA, Ref. CP17129CL001, March 2017.
- Environmental Assessment Report – Attachment four for Petrol Coedpoeth, High Street, Coedpoeth, Wrexham, SUBADRA, Ref. CP17129CL001, March 2017.

In relation to the report I can provide the following comments:

The preliminary risk assessment (desk study) section within the report includes a description of the site including its past historical uses. An appraisal of the site environmental setting is presented including its geology, hydrogeology and hydrological regime, mining activities, and a detailed summary of the site walkover, and identification of additional environmental sources, pathways and receptors. This information was used to determine the site investigation works at the site; however it would have been prudent to compile a clear site conceptual model, which identifies potential sources, pathways and receptors and likely pollution linkages before the site investigation works have been undertaken.

In relation to the site investigation works and the final risk assessment report undertaken at the site please can the following be clarified?

- Was a PID used during the site investigation stage? This is usually common practice due to the nature of the site; however it is not detailed within the report.
- Justification for the different sample depths for different analysis, and the proportion of samples taken from the made ground for analysis.
- Please provide details of the derivation of the GAC's for groundwater in relation to Human Health and provide a justification as to why the Drinking Water Standards (DWS) are not used.

- Justification for the lack of discussion on investigation of ground gas conditions at the site and a more detailed ground gas risk assessment in accordance with current best practice is required.
- The exploratory locations to date do not provide adequate site coverage and further site investigation is deemed necessary once the site has been decommissioned.
- On completion of the site investigation works the final risk assessment will need to be updated.

It is understandable that site works in relation to decommissioning the petrol station will need to start before the finalisation of the site investigation; the process will need to be done in parallel. On completion of the site investigation / decommissioning works, the site will require remediation prior to the site being suitable for its intended use. Submission of a remediation strategy for approval before the commencement of any remedial works on site. An acceptable remediation strategy would be expected to include the following:

- The objectives of the proposed remediation works.
- Details of the proposed works that should include:
 - Description of ground conditions.
 - Details of the type, form and scale of contamination to be remediated.
 - Details of the remediation methodology, including remedial, protective or other works.
 - Appropriate site plans and/or drawings.
 - Proposed phasing of the works and appropriate timescales.
- Details of appropriate consents, agreements and licences, for example discharge consents and waste management licences should be provided.
- Site management procedures designed to protect site neighbours, the local environment and amenity during works should be provided, including where appropriate:
 - Health and safety procedures.
 - Appropriate measures to control dust, noise and odours.
 - Control of surface run off.
- Careful observations should be made during all foundation and landscaping works to confirm the current assessment of site conditions. Any evidence of additional contamination should be brought to the attention of the Council.
- Details should be supplied that state how any variations from the approved remediation strategy that may arise during the course of works will be dealt with, including notification to the relevant local authority officers dealing with contaminated land issues.
- Details of how the works will be validated to ensure the remediation objectives have been met are required and should include details of:
 - The sampling strategy chosen.
 - Appropriate use of on-site observations, including visual and/or olfactory evidence.
 - Appropriate post-remediation chemical analysis and/or monitoring data.
 - Justification for the proposed clean-up standards including target contaminant concentrations.

It is therefore recommended that the following conditions and note to applicants be applied to any future planning permission.

Conditions

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.

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.

Note to Applicant

A11NA SITE CONTAMINATION

Further advice on compliance with condition no. @@ may be obtained by contacting the Council's Environment and Planning section on 01978 298989 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 Environment and Planning section prior to commencement of works on site.

Should you have any queries regarding this memo please do not hesitate to contact me on Ext 8774.



Helen Bradshawe
Contaminated Land Officer