

MEMORANDUM



From:	Helen Bradshawe Contaminated Land Officer	To:	Sharon Holman Planning Officer
Our Ref:	P/2017/0653	Your Ref:	P/2017/0653
Date:	18/08/17	No. of Pages:	1

KARINYA COTTAGE, WESLEY ROAD, BWLCHGWYN

I have received the following information submitted with respect to condition 8 of planning permission P/2017/0653:

- GroundSolve Ltd. Phase I and II Environmental Report. July 2017

Having reviewed the above information I can provide the following comments. I trust that you will forward them to the appropriate person(s). Please note that I have not provided comments on radon as it is not within the remit of the Contaminated Land Team.

1. I can confirm that 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, waste management issues, and identification of additional environmental sources, pathways and receptors. This information has been used to compile a site conceptual model, which identifies potential sources, pathways and receptors and likely pollution linkages. The Phase I desk study information was found to be adequate within the report.
2. The ground investigation methodology adopted is not satisfactory for the size of the site, for future site investigations please see current UK guidance for information on how to calculate the number of exploratory holes / samples required for a ground investigation for a proposed residential property. The report has stated that remediation is required in the garden areas due to the presence of Lead and PAH contamination in the shallow soils. In this instance no further site investigation works are necessary at this time.
3. Section 8.11 – It is noted that the 'assumed' contaminated topsoil buried beneath the car parking areas would be suitable for reuse as an engineering fill, which can be placed in the front and then capped for car parking. This is only acceptable if this is a permanent car park area. Can you confirm the surfacing material for the car park area?

4. Section 8.11 - It is noted that a clean soil cover is proposed in landscaped areas to a minimum depth of 400mm reinstated with clean imported topsoil. I am not in agreement that the proposed remediation (depth of cover) is sufficiently robust for the proposed development. Please can you provide further explanation / justification for the remediation strategy?

The lack of guidance on cover systems is a problem for both developers (and their consultants) and regulators and I am aware that there are sometimes quite significant variations between Councils on what they require. Whilst I do not consider this to be an acceptable situation, it nevertheless exists and I feel at present (without further authoritative UK guidance) it is most appropriate to continue ensuring consistency with current Council practices. These practices are to require between 800-1000mm cover, this range allows for the slightly differing practices that have been adopted by the Planning Department and this Department. Councils have been informed to use the BRE guidance with caution and be aware that it is not considered to be complete (I understand that the funding from the EA to complete the research has been withdrawn).

5. Should material need to be removed from site, then copies of the waste transfer notes must be included within the validation report for the site to demonstrate that the material has been appropriately disposed of.
6. If material is to be imported to site then please note that Wrexham CBC requires the principles set out in the document 'Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems' by the Welsh Land Contamination Working Group, dated May 2013, to be followed. Please find attached a copy for your information. Based on this the Contaminated Land Team require the following information to be supplied before we can be satisfied that the material to be imported to site is suitable for use.
 - Source of the material.
 - Types of material to be imported.
 - The amount of material to be imported.
 - Completed Imported Materials Declaration Form, this is available on p5 of 'Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems' document provided.
 - Chemical suite that the material is going to be tested for will need to be approved by the Contaminated Land Team. Please note it is not possible to agree the chemical suite until we know the source of the material.
 - The sample frequency should follow as much as reasonably possible the sample frequency detailed in the 'Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems'

document provided and must be agreed in writing with the Contaminated Land Team.

- Please note that dependant on the source of the imported material, the Council may require samples to be taken for chemical testing after the material has been placed to demonstrate that it is suitable for use

7. The validation report should be undertaken by an appropriately qualified third party, such as an environmental consultant.

Please note that I cannot recommend the discharge of condition 8 of planning permission P/2017/0653 until a satisfactory response, to the above Items, has been submitted and approved in writing by the Contaminated Land Team.

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

Helen Bradshawe
Contaminated Land Officer