

MEMORANDUM



From: Paul Sleeman
Contaminated Land Officer

To: Matthew Phillips
Planning Lead

Our Ref: P/2016/0836

Your Ref: P/2017/0372

Date: 02 June 2017

**No. of
Pages:** 1

VICTORIA ROAD, COEDPOETH

I have received the following information submitted with respect to condition 4 of planning permission P/2016/0836:

- Smith Grant LLP. Combined Stage I and II Land Contamination Assessment, Victoria Road, Coedpoeth. April 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. The ground investigation methodology adopted is satisfactory and it is agreed that remediation is required due to the presence of lead contamination in the shallow soils. It is also noted that zinc contamination is also present at concentrations that could pose a risk of damage to plant growth.
2. Section 7.2.1 – It is noted that a clean soil cover is proposed in landscaped areas to a minimum depth of 300mm with a mechanical break / hard dig layer or a base geotextile to prevent bulk soil movement and mixing. This is proposed based on the small garden areas (126m²) and the presumption that they are unlikely to be used as a garden, however it is stated in section 5.2.4 that samples were taken at depths (TP1 0.5-0.6m, TP2 0.2-0.4m and TP3 0.1-0.5m) where future exposure to residents could be anticipated, which are deeper than the proposed level of cover. Furthermore, it cannot be presumed that a future occupant will not replace the turf with plants and in fact this was acknowledged in drawing number E035/007 (Rev B) submitted with the planning application where it is stated that 'low level shrub planting is to be used to complement lawn at the discretion of the occupier'.

I am therefore 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 taking into account my comments above?

3. Section 7.2.3 – 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.
4. 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
5. 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 4 of planning permission P/2016/0836 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 8772.

A handwritten signature in black ink, appearing to read 'P Sleeman', written in a cursive style.

Paul Sleeman
Contaminated Land Officer