

Wrexham County Borough Council
Planning Officer
16 Lord Street
Wrexham
LL11 1LG

Date: 17th November 2016

Dear Sir/Madam,

**APPLICATION FOR APPROVAL OF DETAILS RESERVED BY CONDITIONS IMPOSED
UNDER PLANNING PERMISSION P/2014/0658:
CONDITION 2 - CONTAMINATION REMEDIATION STRATEGY
CONDITION 3 - TIMETABLE FOR THE SUBMISSION OF A VERIFICATION REPORT
CONDITION 4 - MONITORING AND MAINTENANCE PLAN IN RESPECT OF CONTAMINATION
CONDITION 7 - EVOLUTION ECOLOGY PROTECTED SPECIES SURVEY REPORT
MAELOR WORKS, MARCHWIEL**

Thank you for referring the above planning application received at our office 3rd October 2016.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirements. We would object if the scheme does not meet these requirements.

Requirement: Condition 4: Remediation Strategy

Condition 4

The post remediation monitoring carried out is not as was agreed in our written correspondence with IKM on 18/3/15. In our email responding to David Cooke's email of 10 March, we welcomed IKM's proposed "extension of the post remediation monitoring to include at least a second round of monitoring 6 months after the completion of remediation works." From the Verification Report it would appear that monitoring was carried out either just one week after completion of remediation and then three months after completion (page 67); or one month after completion of remediation and then 4 months after remediation (page 106). Was the reduction from the proposal agreed with the local planning authority?

Also, in the limited number of the peripheral monitoring boreholes that were sampled there is an absence of data relating to phenols, cyanide, lead, zinc and ammonia for boreholes MW99-104 and MW11-102. We note that elevated cyanide was detected in borehole MW11-02 in July 2015 and was also detected in surface water at SW6 in July. MW11-02 does not appear to have been sampled in October.

The reduction in/shorter term monitoring is a matter concern particularly in light of the apparent deviation from the agreed remedial strategy for area AC1. Section 3.8.2 explains that “Dissolved phase contamination in groundwater to the north of the former spent oxide bunker was not included in the groundwater abstraction programme as originally planned, due to licensing delays and pump unavailability / loss. Consequently, shallow groundwater in this area (as far as the northern and western site perimeter) remains impacted by low level dissolved contamination.” Was this agreed with the local planning authority?

The report goes on to say that “Groundwater in this area will be subject to ongoing natural attenuation, previously assessed as part of the site investigation phase and by comparison against samples from the southern section of Area AC1, closer to the identified sources.” If natural attenuation is to be relied upon then we would welcome further discussion and justification in the Verification Report. It also further justifies the need for at least another full round of post remediation monitoring from the peripheral boreholes and the surface water monitoring points to include analysis for all the determinands previously analysed for.

Until the above points are satisfied we cannot recommend discharge of condition 4.

Condition 7

1. The works were subject to derogation licence issued by NRW.
2. The works were carried out to a satisfactory standard from an EPS perspective

As such, we have no objection to the discharge of condition 7.

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

Yn gywir / Yours' faithfully,

Ruth Prichard

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor

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Deialu uniongyrchol/Direct dial: (0300) 065 3787 **Siaradwr Cymraeg / Welsh Speaker** 

cc: