

New Prison North Wales

Planning Conditions

Reserve Matter Condition 9

Supplementary Information (Green Text)

21st August 2014

Document control

Version No.	Date of first issue	Purpose of issue	Amendment summary
V01	29/07/2014	Reserve Matter Discharge	First Issue
V02	19/08/2014	Supplementary Reserve Matter Discharge Information	Supplementary information following Wrexham CBC queries
V03	21/08/2014	Supplementary Reserve Matter Discharge Information	Supplementary phasing details added following Wrexham CBC discussions

Original Submission Information :

Condition 9.

Technical Notes included providing information to discharge the reserve matter condition:

- Condition 9.

Please note we are currently undertaking further survey works to establish and verify the existing SI and contamination report.

Supplementary Information : 19/08/2014

Updated Technical Note attached as agreed with Angela Guy, Wrexham CBC Contaminated Land Officer

Supplementary Information : 21/08/2014

Further updated Technical Note attached detailing principles and programme of the proposed remediation strategy, all as discussed with Wrexham CBC

Provided :

- 1No paper copy of submission pack
- 2No paper copies of large format drawings
- 1No electronic copy

NORTH WALES PRISON

Planning Issues: Condition 9

The reserved matters application shall include a scheme to deal with potential contamination at the site. This scheme shall include a phased investigation approach to identify the extent of contamination and any measures required to remediate the site, including post-development monitoring.

Approach and Context

The responsibility for undertaking works to identify the extent of contamination and any measures required to remediate the site, including post-development monitoring will devolve to Lend Lease, who will appoint specialist SiLC-led geo-environmental consultants to fulfil all relevant requirements.

The guidance on how to overcome risks associated with contamination in the context of development on previously used land is provided in document CLR 11 (*Environment Agency, 2004. Model procedures for the management of land contamination. Contaminated Land Report 11*) and other documents to which it refers. CLR11 covers the investigation, assessment, remediation and validation of potentially contaminated land. The principles of CLR11 will be followed in all aspects of the work.

Technical Requirements

General Approach

To discharge Condition 9 in respect of all or any part of the site, the following tasks will need to be undertaken:

- Phase I Desk Study;
- Phase II Site Investigation;
- Interpretation and Risk Assessment
- Preparation of an Outline Remediation Strategy;
- Regulatory Consultations and Agreements;
- Detailed Remediation Method Statement;
- Remedial works implementation;
- Post remediation monitoring (as required);
- Validation.

Phase I Desk Study

The Phase I desk Study will involve compilation of available information to develop a Robust Preliminary Conceptual Site Model. Key information will be site history (and hence an interpretation of historic contaminative uses), geology, hydrogeology etc. All potentially significant pollution linkages will be identified and those considered plausible will be carried forward to Phase II investigation.

The development site is the former Firestone factory which was demolished following closure. The general location is that of the Wrexham Industrial estate. Prior to being put forward for development of the new prison, the site was subject to several phases of investigation to assess ground conditions. These investigations presented a preliminary conceptual which was assessed further by investigation.

These previous reports will be reviewed as part of providing an updated Phase I assessment prior to instigating additional Phase II investigations. Whilst such previous reporting is of value, it does not represent the Phase I submission that will be made in relation to Condition 9 of the OPP, and all findings will be thoroughly reassessed. In particular, the existing Phase I assumed a commercial end use but some element of Residential with Plant Uptake will apply reference possible garden areas where produce for consumption will be grown.

Phase II Investigations

The key issues considered in previous investigations were those associated with chemical contamination and asbestos. The results are valuable in recognising uncertainty which will help guide the focus of the second phase of intrusive investigations.

Regarding chemical contamination, reprocessing the data using currently applicable assessment methodologies has indicated no significant risk. The presence of asbestos in soil has however been noted. Both issues will be reassessed through implementation of a further phase of investigation and risk assessment, with close attention to the asbestos issue.

The output will be further assessment of the risk and the derivation of remedial measures to reduce them to acceptable levels as required.

Interpretation and Risk Assessment

Previous and new data would be compiled to create an updated conceptual model. Within the model, potentially significant pollution linkages will be clearly identified and subject to risk assessment using standard techniques such as CLEA 1.06, Remedial Targets Methodology, ConSim etc.

Unacceptably high risks will be highlighted for remedial action to break the linkage and an outline remediation strategy to reduce the risk to acceptable levels will be presented.

Regulatory Consultations and Agreements

It is anticipated that at this stage the findings will be discussed with the Local Planning Authority (via the Contaminated Land Officer) to secure agreements to proceed with the recommended remediation strategy.

Detailed Remediation Method Statement/Materials Management Plan

In terms of remediation, the intention is to adopt a sustainable approach to the works required, especially in respect of safe re-use of site-won materials though adherence to the CL:AIRE Code of Practice.

The practicalities of the remediation works required will be set out in a Detailed Remediation Method Statement in which Remedial Target Values are clearly identified.

Remediation Works Implementation

Works will be assigned to an experienced remediation contractor and subject to supervision and monitoring by a qualified and experienced geo-environmental consultant.

Verification and Monitoring

Post remediation monitoring will be undertaken in relation to the remedial targets met. This might include validation testing of soils, groundwater monitoring and ground gas monitoring.

On completion all remediation works and monitoring will be verified to the satisfaction of the regulatory authorities, especially the Local Authority Contaminated Land Officer and the Environment Agency. Submission of the appropriate documentation is expected to lead to all Planning Conditions relating to contamination being discharged.

Programme of Work

A programme of work is attached, which takes into account completion of the work in stages, where, in this case, the relevant work is the cut and fill groundworks exercise. It may be noted that a Phase II ground investigation has been completed and the programme shown included the confirmed availability of test data. The main components of the programme are as below with some overlap between them as shown on the Gaant chart attached

- Complete Phase I and Phase II reports etc. for Area A using the results of previous investigations plus available information from the August 2014 Hydrock investigation;
- Submit reports to Wrexham CBC for approval in respect of Area A only;
- Obtain approvals for area A;
- Complete cut and fill works on Area A;
- Submit verification report for Area A;

- Complete Phase I and Phase II reports etc. for remaining areas using WYG and Hydrock data combined;
- Obtain approvals for remaining areas;
- Complete cut and fill works on remaining area;
- Provide sequential verification reports for each of the remaining areas.

Unexpected Contamination

The works will be subject to supervision by a qualified and experienced geo-environmental consultant with a mandate to observe ground conditions and to systematically take samples to ensure suitability for use of the placed material with reference to the Phase II Risk Assessment findings.

Any potentially deleterious material will be set aside until such time as tests indicate an appropriate disposal route can be identified (which may include re-use on site under the terms of an approved Materials Management Plan.

C14656: North Wales Prison Lend Lease

