

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 objective of this submission is to explain how the contamination issues will be dealt with. It is assumed that submission of the Phase I, Phase II reports etc. will be undertaken to discharge planning conditions included in a Detailed Planning Permission to follow.

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.

Phasing of the works will be as follows:

- 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 concerning the site 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.

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.

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.

Detailed Remediation Method Statement

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

It is as yet unclear how the remedial works will be procured and undertaken but the 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.