MEMORANDUM

From:	Stacey Inglis Contaminated Land Officer	**To:**	Jenni Perkins Senior Planning Officer
Our Ref:	P/2024/1157	**Your Ref:**	P/2024/1157
Date:	20 November 2024	**No. of Pages:**	2

TOWN AND COUNTRY PLANNING ACT 1990

P/2024/1157 RUABON BUSINESS PARK SITE, WREXHAM, LL14 6TE

DISCHARGE OF CONDITIONS 7 (MATERIALS), 22 (LANDSCAPING), 26 (INTERNAL ROADS), 28 (PARKING AND TURNING FACILITIES) AND 31 (CONTAMINATION) OF PLANNING PERMISSION P/2018/0053

The following additional information has been submitted for the discharge of condition 31 of planning permission P/2018/0053:

- NHBC Risk Guide – Radon/Gas Protection (Revised 01/24)

The above additional information has been read in conjunction with previous reports submitted for the discharge of condition 31 of planning permission P/2018/0053

- MLM Environmental, Carter Jonas, Ruabon Park, Wrexham, Phase 1 Contamination Assessment Report, Ref: 773135-REP-ENV-001, revision 0, 16 November 2015.
- MLM Environmental, Carter Jonas, Ruabon Park, Wrexham, Phase 2 Preliminary Geoenvironmental Assessment Report, Ref: 773135-REO-ENV-002, revision 0, 27 November 2015.
- BGS Geo Report, E-Geo Solutions Ltd, Radon Report, ID BGS_326495/34724, 16 May 2022.
- Written Statement 'Ruabon Business Park, Adjacent to A483, Ruabon, Wrexham, LL14 6TE: Planning approval P/2018/0053 to discharge pre-commencement condition 31 for phase 1 of the residential section of land (phase 1 Reserved Matters approval P/2020/0673).
- E-Geo Solutions – Geotechnical and Ground Gas Investigation Report. Plot 1, Plot 2, Plot 3 Ruabon Park, Watkin Way, Ruban LL14 6EP. Report No, E1450.GGC.R1. Dated May 2022.

- Pure Residential & Commercial Limited - Written Statement at 'Development at Ruabon Business Park, Wrexham, LL14 6TE – Planning application P/2024/1157 relating to condition 31 of planning permission P/2018/0053. Dated 17 September 2024

It is acknowledged that a NHBC Risk Guide has been submitted for Radon/Gas Protection, however there is no covering letter / statement which explains what this is in relation to as it does not seem to link to any of my comments made in my last memorandum dated 10 October 2024. As previously stated Radon matters are not within the remit of the Contaminated Land Team.

I have copied my comments from my last memorandum below as a response is still outstanding.

I have the following comments to make and I trust that they will be forwarded to the appropriate person(s). I have retained the numbering from the previous memorandum dated 22 July 2024.

1. *Whilst the Phase 1 report prepared by MLM is now 9 years old I consider it to be sufficient in principal, however a written statement by a suitably qualified person confirming that following a site inspection there have been no changes to the site since the report was prepared is required.*

   No further information required.

2. *I also consider the Phase 2 report to be sufficient in principal, but subject to three matters requiring further clarification/attention:*
   i) confirmation that there have been no significant changes to the site in terms of potential contamination since the report was prepared (as per item 1 above),

   I acknowledge and accept the written statement from Pure Residential 7 Commercial Limited that there has been no significant changes since the report was prepared.

   ii) the findings of additional gas monitoring is provided (as per the report's recommendations in section 12.3), and
   iii) assuming gas protection measures are required these need to be detailed in a Remediation Strategy.

   Having reviewed the Geotechnical and Ground Gas Investigation Report it is noted that the area investigated does not cover the entire footprint of the above development. Whilst I am in agreement with the conclusions and recommendations within the report, that no gas protection measures are required, please can you advise if any gas investigations have been undertaken on the remainder of the site that has not been covered or assessed within this report?

   iv) Section 11.6 states a remediation strategy is not required, however if gas mitigation is needed then a strategy will be needed to outline what measures will be put in place. Furthermore a strategy is also required so that any unexpected contamination is adequately dealt with, it should be detailed in the strategy how works should stop in the area of concern to allow assessment of the issue and consultation with the

Contaminated Land Team. This strategy is needed as part of condition 31 and should be submitted for approval.

Please note that a remediation strategy is required, as detailed above, for any unexpected contamination that may be encountered during the course of the development. The requirement for a remediation strategy for gas protection measures is still to be determined, please see my comments under Items 2ii) and iii) above.

3. *The BGS Geo Report is only regarding radon, this is not within the remit of the Contaminated Land Team and is a Building Regulations matter therefore this report has not been reviewed and is not required for condition 31.*

   No further information required.

4. *The E-Geo Solutions report referred to in the Written Statement has not been submitted for the discharge of condition 31, please provide this report so that it can be reviewed (this will presumably link in with my comments regarding 2 (ii) & (iii) above. I note that the covering letter refers to a Ground Gas Investigation, presumably this is the E Geo Solutions Report? Until this report has been reviewed I cannot comment on whether I am in agreement with the conclusion that no gas protection measures (not considering radon) are required.*

   The E-Geo Solutions report has now been submitted, please refer to my comments under Items 2ii) and iii) above.

When the queries detailed above have been addressed I hope to be able to recommend the discharge of condition 31, however at this time I do not recommend its discharge.

Should you have any queries regarding the above then please contact me on Ext. 8773.



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Stacey Inglis
Contaminated Land Officer