MEMORANDUM

From:	Stacey Inglis Contaminated Land Officer	**To:**	Jenni Perkins Senior Planning Officer
Our Ref:	P/2025/0417	**Your Ref:**	P/2025/0417
Date:	19 June 2025	**No. of Pages:**	4

TOWN AND COUNTRY PLANNING ACT 1990

P/2025/0143 – OUTLINE APPLICATION FOR ERECTION OF UP TO 39 DWELLINGS (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED) / OUTLINE APPLICATION FOR ERECTION OF UP TO 39 DWELLINGS (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE RESERVED)

LAND ADJACENT TO SYCAMORE HOUSE, WREXHAM ROAD - A534, HOLT, WREXHAM, LL13 9YU

The following contamination assessments have been submitted in support of planning application P/205/0417:

- e3p – Phase I Geoenvironmental Site Assessment, Wrexham Road, Holt. Reference: 14-608-R1. Dated February 2021
- e3p – Phase II Geoenvironmental Site Assessment, Wrexham Road, Holt. Reference: 14-608-R2-1. Dated April 2021

Having reviewed the above reports I have the following comments to make and I trust that they will be forwarded the appropriate person(s):

e3p – Phase I Geoenvironmental Site Assessment, Wrexham Road, Holt. Reference: 14-608-R1. Dated February 2021

The Phase 1 report is satisfactory and I am in agreement with the conclusions and recommendations within the report.

e3p – Phase II Geoenvironmental Site Assessment, Wrexham Road, Holt. Reference: 14-608-R2-1. Dated April 2021

1. Please note I have not provided comments on the geotechnical aspect of the report as it is not within the remit of the Contaminated Land Team. I have also not

commented on the controlled waters aspect of the report as it is understood that Natural Resources Wales have been consulted and will therefore take the lead in relation to risks to controlled waters.

2. Section 2.4 – It is stated that trial pit locations were *'spatially distributed to offer the maximum site coverage whilst also being advanced to target specific contaminant sources'* however there is no further explanation/justification for the number and location of samples taken for chemical analysis. Only six sample locations (TP105, TP106, TP108, TP109, TP112, TP116) were selected and only four of those were in the near surface soils at 0.10m (TP106, TP109, TP112, TP116).

   Furthermore, it was identified within the initial conceptual site model (e3p Phase 1 Report, section 5.6) that the north eastern section of the site has the greatest potential for contaminants to be present. This area has been used as a storage yard with an agricultural barn and there is the potential for made ground to be present. Only one sample, TP116, has been taken from this area even though there were three additional locations of trial pits/window samples (TP117, WS101, WS102).

   Please can further justification be provided for the chosen sampling strategy?

3. Section 4.1 – It is noted that there has been exceedances of PAHs, TPH and the presence of ecoli in TP116 and it has been proposed that a cover system will be required. There is no further information of what properties within the proposed development will require a cover system and if this is only in the vicinity of TP116. As there are no further samples from the north eastern section it is not known how extensive the area of impacted made ground may be and if other sections of this area may be impacted too. The sampling undertaken in this section of site is therefore insufficient and additional site investigation is required.

4. Section 4.1 – It is stated that the natural drift deposits are acceptable for use as subsoil and that the topsoil is likely to be suitable for use within the proposed garden areas, however further chemical validation samples are required to confirm this. Please can you provide further explanation of why validation samples are required? Is it your intention to also reuse materials in the north eastern section of the site, even though limited sampling and analysis has taken place?

5. Section 4.1 – It is proposed to remove the impacted materials from TP116 and move them to an area of low sensitivity, however this area of impacted material has not been delineated. Further information is required regarding this proposal, to include how it will be managed on site and how TP116 will be delineated.

6. Section 4.3.8 – I am in agreement with the gas assessment.

7. Section 4.5 – It is recommended within the updated CSM that a cover system is required with respect to PL1 and PL2, please refer to Items 2, 3 and 5 above.

8. Section 5.13 – It is noted that there is a recommendation for a remediation and enabling works strategy. Has this been completed? If so, please can a copy of the report be submitted for written approval?

9. Section 6 – I am unable to agree to the recommendations within the report until a satisfactory response has been received to my queries above.

10. It is noted that the Phase 2 report was completed in 2021, some four years ago. Please can you advise if the north eastern section of the site, that has historically been used as a storage yard (including storage of agricultural vehicles) and an agricultural barn, has been in operation since 2021? If so there is the potential that spillages from agricultural vehicles may have occurred in the interim, therefore additional site investigation may be required in this section of the site to determine if site conditions have changed over the last four years.

As there are outstanding contamination issues to be resolved regarding the proposed development it is recommended that the following conditions are applied to any future planning permission that may be granted.

Conditions

EN01 008R PHASED INVESTIGATION - LAND CONTAMINATION
No development shall take place until a phased site investigation of the nature and extent of contamination has been carried out and submitted to and approved in writing by the Local Planning Authority. If any contamination is found during the site investigation, no part of the development shall commence until a scheme specifying the measures that will be taken to remediate the site to render it suitable for the development hereby permitted has been submitted to and approved in writing by the local planning authority. The site shall thereafter be remediated in accordance with the approved scheme. If during the course of development any contamination is found that has not been identified in the site investigation, no further development shall take place on those parts of the site where that contamination has been found until an additional scheme of remediation has been submitted to and approved in writing by the local planning authority for those parts of the site. The relevant parts of the site shall thereafter be remediated in accordance with the additional scheme of remediation.

EN03 008R VALIDATION REPORT - CONTAMINATED LAND
Each part of the site subject to the remediation under the scheme(s) approved as part of condition @@ shall not be occupied/used until a Validation Report has been completed in respect of that part of the site and submitted to and approved in writing by the Local Planning Authority.

Informative

INF03 - SITE CONTAMINATION
Further advice on compliance with condition no. @@ may be obtained by contacting the Council's Contaminated Land Officer on 01978 298771 or 297773. Should the investigation identify contamination issues that may affect receptors other than the site users e.g. groundwater, then it is recommended that these works are also addressed in consultation with the Contaminated Land Officer prior to commencement of works on site.

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



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Stacey Inglis
Contaminated Land Officer