

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Mared Rees Jones
Planning Officer

Our Ref: P/2020/0649

Your Ref: P/2020/0649

Date: 28 October 2020

**No. of
Pages:** 1

TOWN AND COUNTRY PLANNING ACT 1990

P/2020/0649 Former Brymbo Steelworks, Brymbo Park

Erection of Residential dwellings (up to 300), A food store (up to 930sqm), Retail (up to 465sqm), Public House/Restaurant (up to 372sqm), Healthcare or other non-residential D1 use (up to 465sqm) and a 2FE Primary School

When the reclamation of the steelworks took place some 10+ years ago the former steelworks area of this application was known as the Longer Term Development Module (LTDM) and Northern Development Module (NDM) Phases 1 & 2. At that time Contamination Certification Reports were prepared for each module on completion of the contamination assessment and remediation works. These Completion Reports were prepared with the each of module's future proposed uses in mind, these were as follows.

- i. LTDM – commercial, light industrial
- ii. NDM Phase 1 – light industrial, commercial
- iii. NDM Phase 2 – housing, apartments, petrol station and retail

I prepared Memos to the Planning Department confirming that the Contamination Certification Reports were sufficient but highlighting that further requirements for contamination remediation works, depending on the nature of the development that ultimately takes place, will be needed, as was advised in the Reports.

Based on the above I have a number of concerns that will require addressing to ensure any contamination concerns are sufficiently addressed for the proposed development, these are:

- a) The proposed uses that were cited at the time of the reclamation works are different to those now proposed therefore if the Contamination Certification Reports are to be used then the findings should be reviewed and a new risk assessment submitted to identify any outstanding/new concerns based on the new uses of the land. If the

reports are not being used then a new contamination risk assessment should be provided.

- b) Contamination risk assessment guidance has changed since the Contamination Certification Reports were completed and any review or new assessment (under a) above) should be undertaken using current authoritative contamination risk assessment guidance.

The following quote is taken from the 'Coal Mining Risk Assessment' report prepared by Wardell Armstrong dated August 2020. The review that Wardell Armstrong have been commissioned to complete, referred to in the penultimate sentence, does not appear to have been submitted with the planning application, therefore the concerns (a & b above) can be covered by the standard contamination conditions, ZP01B and ZP02A and I would therefore recommend that these are applied to the planning permission granted.

"The earthworks materials were placed to an engineering specification to facilitate subsequent development and this work was designed and supervised by the consultants Scott Wilson (now AECOM). The environmental consultants, Smith Grant, provided advice on dealing with the industrial contamination plus supervision of the earthworks.

The reclaimed site area was notionally sub-divided into a series of development modules. The consultants provided reports for each module which confirmed that the ground conditions were suitable for built development and that residual contamination was not a constraint to development.

Three of the modules in the southern area of the site have already been developed for residential housing. The Brymbo Land Use Plan incorporates four of the former development modules to the east of the Spine Road which runs north / south through the site. Wardell Armstrong have been commissioned to review the previous reports, particularly in respect of the geotechnical and contamination aspects, and to provide a new Ground Conditions Assessment report for each of the four modules. This will ensure that all of the (revised) development modules shown on the Land Use Plan will have a report confirming the suitability of that module for built development with no residual contamination constraints."

Please note that any coal mining geotechnical matters or other potential ground stability issues, including expansion slag, have not been considered by the Contaminated Land Team as this does not fall within their remit.

Should you have any queries regarding the above then please contact me on Ext. 8771.



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Angela Guy
Contaminated Land Officer