MEMORANDUM

From:	Angela Roberts Contaminated Land Officer	**To:**	Sharon Holman Planning Officer
Our Ref:	P/2025/0789	**Your Ref:**	P/2025/0789
Date:	21 November 2025	**No. of Pages:**	3

TOWN AND COUNTRY PLANNING ACT 1990

P/2025/0789 Site Off Wynnstay Technology Park, Llangollen Road, Ruabon, Wrexham, LL14 6EN

DISCHARGE OF CONDITION 8 (VALIDATION REPORT) OF PLANNING PERMISSION P/2019/0805

Further to my Memo dated 04 November 2025 I have reviewed the following additional information which has now been submitted and commented further against the initial 6 queries raised:

- GroundSolve Ltd 'Wynnstay Technology Park – Stockpile Testing, GSL3120LR01 Letter Report, 3rd October 2024 to Castlemead Group Ltd; and
- GroundSolve Ltd 'Wynnstay Technology Park – Verification Report (Areas 1 and 2), GSL3224R02 Version 1, 07/11/2025, Final, prepared for Castlemead Group Ltd

Query 1

It is understood that the above letter report on stockpile testing is for subsoil, unfortunately it still does not fully address this query. Whilst it has been clarified it was site won, it is not stated what area of the site was the soil taken from? Reference should be made to the site investigation report to demonstrate there was no contamination of concern in that area and it was established as suitable prior to being dug up. In addition, it is noted that some photos of the subsoil do not appear to show a 'clean' subsoil i.e. just subsoil, they look like made ground, in particular plots 3, 9 and 10 (there were no photos of the subsoil from plots 1, 2, 4, 5, 7 so I can't comment on those).

Query 2

Section 4.5 of the Verification Report (Areas 1 and 2), GSL3224R02 does not provide clarification on the origin of the subsoil and topsoil, other than it is site won. There is no explanation of where the material was excavated from on the site and there is no reference to the site investigation reports to demonstrate the area in question was suitable.

Having checked the latest site investigation carried out by GroundSolve (Additional Phase 2 Ground Investigation GSL3060R01 dated 28/03/24), there appears to be no indication there could be material on site which would be suitable for a clean cover system. It describes the surface of the site as being very gravelly, and made ground is present typically to 1.0m comprising colliery spoil (gravelly sand/sandy gravel, including ash, clinker, coal brick and concrete) and the superficial deposits were glacial till. The ground conditions from the intrusive site investigation itself states "*made ground was present across the whole site to a maximum depth of 3.00m. The made ground was generally comprised a loose to medium dense clayey very sandy gravel or a dark brown sandy gravelly clay. The gravel present in the made ground was a mixture of sandstone concrete, clinker, coal, and brick.*".

Query 3

Section 4.5 of the Verification Report (Areas 1 and 2), GSL3224R02 sufficiently clarifies this query. It is now clear that:

i. SP1 ES1, SP1 ES2, SP1 ES3, SP2 ES1, SP3 ES1, SP4 ES1, SP5 ES1, SP5 ES2, and SP6 ES1 are all topsoil samples from 6 different stockpiles at the site.
ii. It confirms that J1, J2, J3, J4, J5, J6 was from a subsoil stockpile at the site.
iii. And SP10, SP401 (A), SP401 (B) and SP401 (C) are more topsoil samples from another topsoil stockpile.
iv. It also states that in addition to plots 3, 5, 7 and 34 having testing within them, the following plots have also been tested: 39, 15, 24, 42 and 18.

Query 4

Additional lab results have been provided in the Verification Report (Areas 1 and 2), GSL3224R02, this query is not satisfied.

Query 5

This matter is addressed by the sample location plan is not now a concern.

Query 6

As all plots and the landscaped area have not been checked, I was seeking confirmation that GroundSolve had an assurance from Castlemead Homes that they had carried out the remediation works as required.

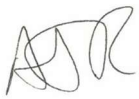
The consultancy GroundSolve contacted me on the 14 November 2025 regarding my initial response on the 4th November and I explained my concerns to them as outlined above. I also requested a copy of the 'Additional Phase 2 Factual Report, Ref:3060R02, issued April 2024 – Topsoil reuse Assessment' which is referred to in the updated Verification Report (07/11/25).

They responded on the 18 November 2025 and provided a copy of the topsoil letter report. I have reviewed that report and note it states:
"The stockpiles comprised of topsoil and some vegetation from trees and shrubs across the site."

However as detailed above, there was no indication from the site investigation report that there was material on site which could be suitable for a clean cover system, including any topsoil for the southern part of the site either. Because of that I was anticipating that the material would be imported to site.

I am still not satisfied with the verification report due to the level of detail being insufficient and inconsistencies with the site investigation findings and remediation works completed. Queries 1, 2 and 6 have not been satisfactorily addressed.

Therefore, I do not recommend the discharge of condition 8. Should you have any queries regarding the above then please contact me on Ext. 8771.



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Angela Roberts
Contaminated Land Officer