MEMORANDUM

From:	Angela Roberts Contaminated Land Officer	**To:**	Minerals Planning Officer
Our Ref:	P/2026/0075	**Your Ref:**	P/2026/0075
Date:	01 April 2026	**No. of Pages:**	3

TOWN AND COUNTRY PLANNING ACT 1990

P/2026/0075 BEFESA, FENNS BANK, WHITCHURCH, SY13 3PA

INSTALLATION OF IN-VESSEL COMPOSTING (IVC) FACILITY AND ASSOCIATED DEVELOPMENT

I have reviewed the following report that has been submitted with the planning application:

- H Fraser Consulting, Land Quality Assessment Former Aluminium Slag Reprocessing Plant, Fenn's Bank, Whitchurch, SY13 3PA, prepared for Axis P.E.D. Ltd, dated 04/09/2025

In addition, I have read the consultation response from Natural Resources Wales (NRW) dated 25 March 2026, reference: CAS-301032-B4C9.

It is noted that NRW state "*Although the cleanup of contaminated land (soils / superficial deposits) is thought impractical, we do advise the removal and / or treatment of contaminated waters and the subsequent control of contaminated water leaving the site via the onsite drainage system and adjacent drainage ditches*." And in relation to Pollution of Controlled Waters: "*Existing lagoon - The future use of the existing lagoon remains unclear, we advise that additional information is required to clarify whether the lagoon will be infilled, decommissioned, or reused. We also advise that landfill gas is known to accumulate beneath the lagoon liner and therefore a gas assessment is required prior to any future use being approved*."

They also state regarding the Permit "*NRW Environmental Permits will be required to ensure compliance with discharge and water quality standards and to protect the wider environment. The current permit needs to be surrendered including the remediation of the surface water lagoon before the application of the composting permit can be considered*."

The following comments focus only on human health risks. As the site is permitted and there is a long history with NRW on the site's regulation and pollution impacts (and formerly Environment Agency Wales) the Contaminated Land Team have nothing to add regarding controlled water risks and potential ecological impacts as NRW have provided detailed comments.

In principle I agree with the findings of the human health risk assessment and gas risk assessment. Whilst the conclusions refer to the current site layout being primarily hardstanding and indicate the large existing warehouse will be used, there is limited discussion on whether any other existing buildings will remain (office, weighbridge area), or any new buildings constructed or what new landscaping is proposed (it is noted some of the site is mixed scrub that appears to have been left to self-vegetate). A Remediation Strategy is required and this should provide further details on specific remediation measures for the development proposals as a whole. In particular the Strategy should:

i. outline what gas mitigation measures are required. Details of specific measures for existing buildings and any new buildings need to be provided, along with the proposed validation measures for their installation. The document should also address the risk of existing boreholes creating a pathway for gas and whether any works are required to mitigate this; and
ii. it should also outline measures to be taken should any unforeseen contamination be identified during development works.

It is noted that the conclusion of the report states that "*The above assessment assumes that an on-site surface water lagoon will be decommissioned prior to the redevelopment of the site and the contents disposed of appropriately.*" but the proposed site layout drawing (VES_TD_WREXIVC_200_000, Revision A 02.05.25) shows a 'pond' which based on Figure 2.1 of the report is the lagoon which was said will be decommissioned. Therefore, should the lagoon be remaining on site then the opinions and advice contained in this Memo will need to be reviewed.

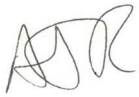
I would recommend that the following site specific condition and note to applicant be applied to any future consent that may be granted.

Conditions

Site Specific Land Contamination Assessment Condition
No development shall take place until a scheme specifying the measures that will be taken to remediate the area 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 further contamination is found that was not identified during the investigation, no further development shall take place until an additional scheme of remediation has been submitted to and approved in writing by the local planning authority. 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.



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Angela Roberts
Contaminated Land Officer