MEMORANDUM

From:	Angela Roberts Contaminated Land Officer	**To:**	Jenni Perkins Planning Officer
Our Ref:	P/2026/0126	**Your Ref:**	P/2026/0126
Date:	01 April 2026	**No. of Pages:**	3

TOWN AND COUNTRY PLANNING ACT 1990

P/2026/0126 HYDRO ALUMINIUM DEESIDE LTD, BRIDGE ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9PS

DISCHARGE OF CONDITIONS 4 (CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN), 5 (ECOLOGY), 6 (LANDSCAPE AND ECOLOGICAL MANAGMENT PLAN), 9 (CONTAMINATION), 13 (ARBORICULTURAL METHOD STATEMENT) AND 18 (DUST MANAGEMENT SCHEME) OF PLANNING PERMISSION P/2024/1554

In my Memo dated 20 November 2024 I confirmed that I had reviewed the proposed application and associated supporting documents available online at the link provided for the pre-application consultation. The relevant documents for land contamination were a Phase I Geo-Environmental Site Assessment Report dated May 2024 Ref: 16-685-R1-2 and Phase II Geoenvironmental Site Assessment dated May 2024 Ref: 16-685-R2-2 both prepared by e3p for Hydro Aluminium Deeside Ltd. It was noted that some minor works were recommended within the Phase II report (further analysis of surface water at the river and drain) and therefore the standard land contamination condition was recommended, this would cover the further site investigation required, in addition to a Remediation Strategy also being needed.

I have reviewed the following letter report submitted with this application:

- Remediation Strategy Hydro Aluminium, dated 24th February 2026, Ref: 16-685-L2 from e3p to Hydro Aluminium

The Strategy refers to the following report which I have not yet seen, please can a copy be provided to me:

- Genesis Environmental Ltd – Site Report of Hydro Aluminium Deeside, Wrexham. Report Ref: ADE/178/SR, dated August 2021, Prepared for Hydro Aluminium Ltd.

I have the following comments on the remediation strategy:

1. The strategy refers to a residential development at the top of the second page, I will assume this is a typing mistake and the proposals in the strategy are for the industrial development proposed under planning permission P/2024/1554.

2. On p4 it is stated under the Human Health Risk Assessment, that PCBs were encountered during the previous Gemini investigation. It is also mentioned on p7 that an elevated concentration of lead was also reported. It is stated that an exploratory hole location plan from the Genesis Environmental Ltd investigation was not provided to e3p, however this is required for me to be able to properly review the report. When I have reviewed a copy of the Genesis report I may wish to provide further comments on this.

3. RE-4 – Surface Water Monitoring – it is stated: "*The nearest surface watercourse is a drainage channel located 15 m NW of the site and there is also a drain present in the far north east of the site. Surface water samples should be obtained to ensure no detrimental effect during the enabling works. It is proposed to complete monitoring prior to the main earthworks commencing, during the works and at the end of the works*." It appears to be a recommendation, will this work happen?

4. RE-5 – Preparation of Landscaped Areas for Cover System – it is stated:
   "Where Made Ground is deemed unsuitable for retention in a landscaped area, the area will be subject to a reduced-level dig to remove unsuitable material to a minimum depth of 300 mm below finished landscaped area level or verified natural stratum (whichever is the shallower).
   Excavated soil will be stockpiled pending the results of the appropriate validation testing (to be completed in accordance with this specification) prior to reuse in an area of no sensitivity or, where necessary, this material will be removed from site in accordance with UK waste management legislation.
   The placement of certified subsoil and topsoil will be completed as part of the developer works/build phase mitigation plan.
   All landscaped areas where a cover system is required will be subject to independent validation."
   What will be deemed unsuitable? Based on item 2 above it appears there is limited contamination present (just isolated areas of lead and PCBs, but yet to be confirmed until a copy of the Genesis report is provided).
   The Environment Partnership (TEP) Landscape Masterplan (Drawing D9871.100, dated 03/10/2023) indicates the existing trees and vegetation will be retained where possible, this is the same as the PACE Architecture Proposed Site Plan (Drawing 2027.P.003 (F)). This implies no works are taking place in this area and I assume this will mean there is no remediation works in this location either?
   The TEP Landscape Masterplan indicates areas of woodland edge planting and wildflower amenity grassland – are these the areas which will be subject to any remedial works where required?

5. RE-8 – Independent Validation: Watching Brief – I agree that this is required. Please clarify what is meant by: "*it is recommended that a Stage 2 Detailed Risk Assessment is undertaken prior to the commencement of groundworks*".

6. RE-9 – Waste Soils Surplus to Requirements – as mentioned under RE-5 above, based on the Landscape Masterplan and Proposed Site Plan it appears that no works will take place on the bund, however it is stated here that it is understood the bund materials will

be removed as part of the enabling works prior to construction of the proposed development.
Based on the comments here and in item 4. above, it will be necessary to clarify what landscaping works and changes (if any) to the bund are taking place and the locations of any areas of concern (the elevated lead and PCBs) and ensure that the Remediation Strategy accurately reflects the works that area required in those areas and in relation to the landscaping works.

7. RE-10 – Validation of Materials for Potable Water Supply Infrastructure. I agree that a UKWIR Risk Assessment needs to be undertaken and if required specialist pipework used for the water supply. The assessment and any resulting actions should be detailed in the Verification Report.

8. RE-11 – Remedial Verification Report. Please explain the reference to the PAH impacted materials.

9. Table 2.1 – the testing proposals should be in accordance with the Welsh Land Contamination Working Group guidance 'Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems' (provided).

10. Paragraph 4.1 refers to record keeping and details of locations of hydrocarbon impacted soils, records associated with works on other types of impacted soils should also be kept.

Until the above matters have been addressed I do not recommend the discharge of Condition 9. Should you have any queries regarding the above then please contact me on Ext. 8771.



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Angela Roberts
Contaminated Land Officer