MEMORANDUM

From:	Angela Roberts Contaminated Land Officer	**To:**	Jenni Perkins Senior Planning Officer
Our Ref:	P/2026/0326	**Your Ref:**	P/2026/0326
Date:	18 June 2026	**No. of Pages:**	2

TOWN AND COUNTRY PLANNING ACT 1990

P/2026/0326 DISCHARGE OF CONDITIONS 6 (CONSTRUCTION TRAFFIC MANAGEMENT PLAN), 7 (ARBORICULTURAL SUPERVISION), 9 (SITE INVESTIGATION REPORT) AND 13 (LANDSCAPING) OF PLANNING PERMISSION P/2025/0430

LAND AT OAK ROAD, WREXHAM INDUSTRIAL ESTATE, WREXHAM, LL13 9RG

I have reviewed the following reports submitted and can confirm that they are sufficient, specifically the recommendations and remediation requirements detailed in the Brownfield Solutions Ltd Remediation Strategy are acceptable and should be completed. I have the following comments/observations to make but none of them require a response.

- SP Associates, Phase I Assessment, Proposed Industrial Unit, Oak Road, Wrexham Industrial Estate, Client: F1 Real Estate Ltd, Report Number: S1916, March 2024
- SP Associates, Geo-Environmental Assessment, Proposed Industrial Unit, Oak Road, Wrexham Industrial Estate, Client: F1 Real Estate Management Ltd, Report Number: S1916-2, September 2025
- SP Associates, 30th October 2025 Letter Report S1916-3, Remediation Statement – Proposed Industrial Development, Oak Road, Wrexham Industrial Estate
- Brownfield Solutions Ltd, F1 Construction The Oaks, Wrexham, Supplementary Phase II Geo-Environmental Assessment Report, CC/C6668/15518 Rev B, May 2026
- Brownfield Solutions Ltd, F1 Construction The Oaks, Wrexham, Remediation Strategy, CC/C6668/15605, May 2026

1. SP Associates Phase I Assessment: The initial conceptual site model doesn't refer to the pond present before the 1899 historical mapping in the NE quadrant of the site. The pond may have dried up or been infilled and if the latter then there is a risk of land contamination from the infill materials. However the former pond appears to be in the approximate location of a bunker/bunded area on the 1961 historical map and those earthworks will likely have altered any infill that could have taken place. The report should have recognised this. In addition, it is stated in paragraph 3.3.6 that "There are no records of potentially contaminative uses for the site itself." The report goes on to

discuss the former Royal Ordnance Factory that was present on the site (the 1954/1961 ordnance survey mapping shows evidence of structures, bunkers, access roads and hydrants) and it does recognise that this is a potentially contaminative land use.

2. SP Associates Geo-Environmental Assessment: The scope of the site investigation is limited, there having only been 5 boreholes and 3 trial pits, with a total of 10 soil samples taken (no PCBs or explosives testing was undertaken). There were located in the northern part of the site and along the eastern boundary. It is also noted that gas monitoring was only facilitated in 2 boreholes and undertaken on 3 occasions (not the 6 recommended by the Phase I report). No water testing was undertaken from boreholes because they were dry. The recommended detailed UXO report wasn't undertaken prior to the investigation works. Whilst the findings detailed in section 7 indicate no remedial works are required (unless the water supply company specifies specialist pipework), it is agreed, as detailed in Section 8, that the extent of the investigation was limited by the lack of scrub and vegetation clearance and consequently further investigation of the uncleared areas is required, and that work should include an explosives suite and PCB testing. The report also recommends buried structures and obstructions should be investigated initially by a GPR survey will follow up trial pitting and the additional investigation work should be preceded by a detailed UXO report. It is also stated in 7.1.3 that a protocol is in place for any previously unidentified contamination.

3. Brownfield Solutions Ltd Geo-Environmental Assessment: Whilst a detailed UXO report has still not been undertaken it is noted that explosives testing was carried out, along with PCB tests and further investigations now cover the rest of the site area.

4. Brownfield Solutions Ltd Remediation Strategy: Whilst radon has been covered in the Remediation Strategy it is under the remit of the Building Regulations and is therefore not a land contamination matter and will not be addressed by Condition 9, 10, 11 or 12. It is noted that the level of protection for the clean potable water supply pipes is not yet determined, whether a barrier pipe or similar was required can be covered in the Validation Report. The possibility of previously unidentified contamination has been raised throughout the reports detailed above and a watching brief is recommended during groundworks for any unidentified sources of contamination. Whilst specialist advice from an environmental consultant will be required if this happens, the Contaminated Land Team should also be consulted. The details of any subsequent investigation or remedial works arising from the previously unidentified contamination will then need to be reported in the Validation Report required for Condition 10.

I have not provided comments on the geotechnical and radon sections within the report as they are not within the remit of the Contaminated Land Team. As stated above, radon is within the remit of the Building Regulations, and is therefore not a land contamination matter. Furthermore, to date NRW have provided comments on risks to controlled waters and they will wish to comment on this element of the above reports.

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



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Angela Roberts
Contaminated Land Officer