MEMORANDUM

From:	Angela Roberts Contaminated Land Officer	**To:**	Jenni Perkins Senior Planning Officer
Our Ref:	P/2026/0118	**Your Ref:**	P/2026/0118
Date:	09 June 2026	**No. of Pages:**	4

TOWN AND COUNTRY PLANNING ACT 1990

P/2026/0118 CONVERSION OF OUTBUILDING TO DWELLING

SMELT FARM, MINERA ROAD, FFRITH, WREXHAM, LL11 5LS

I have reviewed the following report submitted with the above planning application and have the following comments to make. Please note the Mining Remediation Authority (MRA, formerly the Coal Authority) are the primary consultee on coal mining matters and my observations are supplementary to their comments and are only in relation to mine gas risks and land contamination risks generally.

- Smelt Farm, Wrexham: Coal Mining Risk Assessment (CMRA), GSL505R01, Version 1 30 April 2026 Final, prepared for Clwydian Planning, Document No: GSL_IMSR004

1. Section 4.4 Summary of Risk provides a summary of the principal and secondary risks and further investigation works are recommended. It should be noted that the Coal Authority Consultants Coal Mining Report in appendix C states they have more plans than those listed under the specific catalogue numbers provided on p4 which could affect the enquiry boundary.

   Notwithstanding the above, the Contaminated Land Team are concerned that the risks from gas are not listed in section 4.4 and therefore have not been sufficiently highlighted as requiring further assessment.

   In paragraph 4.2 table 4.1 on p8 of the report it is stated that because there is no record of past mine gas emissions there is no further risk assessment required. Whilst the Coal Authority's Consultants Coal Report (appendix C) indicates that mine gas has not been recorded within 500m of the enquiry boundary (p5 of the report), under section 4 'further information' it states the following in regard to gas risks which means that none being recorded does not equate to no risks.

MINE GAS: Please note, if there are no recorded instances of mine gas within 500m of the enquiry boundary, this does not mean that mine gas is not present within the vicinity. The Coal Authority Mine Gas data is limited to only those sites where a Mine Gas incident has been recorded. Developers should be aware that the investigation of coal seams, mine workings or mine entries may have the potential to generate and/or displace underground gases. Associated risks both to the development site and any neighbouring land or properties should be fully considered when undertaking any ground works. The need for effective measures to prevent gases migrating onto any land or into any properties, either during investigation or remediation work, or after development must also be assessed and properly addressed. In these instances, the Coal Authority recommends that a more detailed Gas Risk Assessment is undertaken by a competent assessor.

It is recommended that the starting point is the assumption that a gas risk is present and it is also noted in the Risk Matrix (table 4.3) mine gas is given a level 2 likelihood (unlikely) rating, we are not in agreement with this and would consider there is a likely (level 3) gas risk for the proposed development.

It is acknowledged that on p11 of the report the advice is that since investigation works are recommended for other coal mining risks then as part of those works ground gas monitoring wells are installed to confirm the absence of any ground gas.

2. On p11 of the report, under 'Recorded Coal Mining Surface Hazards and Surface mining (opencast workings)', it is identified that the western edge of the site overlaps with the eastern boundary of a licensed open cast mine. It goes on to say backfilled opencast mines can present a risk from poorly engineered fill and contamination and the opencast mine mapped in the west of the site could present a risk in terms of differential settlement of buildings spanning the highwall as well as contamination.

   The report recommends a demolition asbestos survey will be required, it was noted that the roof of the barn is potentially made of corrugated asbestos cement sheets.

   In addition, approximately 200m to the northeast of the site is a former lead smelter which was known to have significant lead contamination present and consequently determined as 'contaminated land' for an area which had a residential use.

   For these reasons, it is considered that the potential for land contamination exists and further assessment is therefore required. As part of this further assessment it should be clarified what outdoor garden provision is proposed for the development, since it is unclear from the plans submitted to date.

3. It should be noted that the National Planning Policy Framework is English guidance.

4. A Structural Appraisal Report has been submitted with the planning application and this may contain useful information in relation to the coal mining risk assessment works and any recommendations/mitigation in relation to designing gas protection measures.

5. It is unclear why the likelihood increases from 1 to 2 in relation to spontaneous combustion in the Risk Matrix (table 4.3 on 14 of the report (although it is labelled as 1 of 23)).

Due to the risk of mines gas being present which could impact the development it is recommended that a coal mine gas risk assessment is undertaken to ensure that all risks, current and potentially introduced, are comprehensively assessed and then appropriate remedial measures put in place where required. In addition, land contamination risks from the former coal mining and potentially also the lead ore processing industry in the vicinity requires consideration and risk assessment. Accordingly, I would recommend that the following conditions and notes to applicant be applied to any future consent granted.

Conditions

Site Specific Mine Gas Risk Assessment Condition
No development shall take place until a gas risk assessment investigation has been carried out and submitted to and approved in writing by the Local Planning Authority. If remediation measures are required, no part of the development shall commence until a scheme specifying the measures that will be taken to remediate the site 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.

Site Specific Mine Gas Risk Verification Report
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.

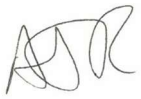
EN01 008R PHASED INVESTIGATION - LAND CONTAMINATION
No development shall take place until a phased site investigation of the nature and extent of contamination has been carried out and submitted to and approved in writing by the Local Planning Authority. If any contamination is found during the site investigation, no part of the development shall commence until a scheme specifying the measures that will be taken to remediate the site 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 contamination is found that has not been identified in the site investigation, no further development shall take place on those parts of the site where that contamination has been found until an additional scheme of remediation has been submitted to and approved in writing by the local planning authority for those parts of the site. 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.

Informative

INF03 - SITE CONTAMINATION
Further advice on compliance with condition no. @@ may be obtained by contacting the Council's Contaminated Land Officer on 01978 298771 or 297773. Should the investigation identify contamination issues that may affect receptors other than the site users e.g. groundwater, then it is recommended that these works are also addressed in consultation with the Contaminated Land Officer prior to commencement of works on site.

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



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Angela Roberts
Contaminated Land Officer