

MEMORANDUM



From:	Stacey Inglis Contaminated Land Officer	To:	Sharon Holman Planning Department
Our Ref:	P/2022/0754	Your Ref:	P/2022/0754
Date:	21 August 2026	No. of Pages:	3

TOWN AND COUNTRY PLANNING ACT 1990

P/2022/0754 – DEMOLITION OF EXISTING BUILDING AND ERECTION OF 5 DWELLINGS

Terfynfa, Smelt Road, Coedpoeth, Wrexham, LL11 3SH

The following report has been submitted in support of the above planning application:

- Geo Investigate – Intrusive Contamination Site Investigation Report. Dated May 2026. Reference: G26124

Having reviewed the report I can advise that it does not meet the requirements set out by the Contaminated Land Team in our memorandum dated 07 October 2022 and, in our email, dated 26 February 2026.

As previously advised the proposed development is on land that has been formerly determined as 'contaminated land' as per Part 2a of the Environmental Protection Act, 1990. The land was remediated in accordance with the Remediation Statement and is no longer considered to present a significant risk based on its **current use** and **existing site layout**. The areas of the site beneath the kennel buildings / outbuildings, kennel runs and other areas of hardstanding that are considered permanent, were not remediated. This is due to the buildings and hardstanding breaking the pollutant linkage.

The proposed development significantly changes the existing site layout which will compromise the remediation that has been undertaken and also create new exposure pathways in the areas where no remediation was completed. This will invalidate the Remediation Statement and cause the land to meet the definition of contaminated land once again.

The Council required the developer to submit:

- i. A detailed Remediation Strategy and Remediation Method Statement prior to granting planning permission to demonstrate that the proposed development will take consideration of the contamination status of the site and ensure the same standard of remediation works is achieved to that which was undertaken for the Part 2a assessment works. This will need to comprise an engineered cover system in all garden and landscaped areas, including for the existing property Terfynfa; and
- ii. Topographical survey details of the existing site levels and proposed site levels.

The developer was also asked to contact the Contaminated Land Team to discuss what is required and obtain the relevant records.

The Contaminated Land Team has not been contacted and the report submitted does not meet the requirements set out above.

The report details soil sampling which has been undertaken within soft landscaped areas, these samples have been taken in areas that have been remediated with clean imported topsoil and subsoil. The analysis results showed no elevated levels of contaminants, which is expected given that it is clean imported material.

It has been concluded within the report that given these results that a formal remediation strategy is not required, we are not in agreement with this. The report does not consider the following:

- There is no discussion on the determination of the site as 'contaminated land' as per Part 2a of the Environmental Protection Act, 1990.
- No summary of the remediation works that have been undertaken, specifically which areas were remediated is detailed, as stated above the areas remediated were based on the current site layout and current end use.
- The proposed development significantly alters the layout of the site and involves the removal of kennels, outbuildings, areas of hard standing, where remedial works have not been undertaken as these were considered permanent features. Now that these are being removed and replaced with houses and residential garden areas, there is a requirement for the same remedial measures (engineered cover system) to be imposed in these areas as those undertaken during the original remediation works. This has not been considered within the report.
- How the proposed development of the site will be managed to ensure that the areas that have been remediated will not be compromised, such as a material management plan.
- No topographical surveys.

In addition, it was noted in our email dated 26 February 2026 that a rotary investigation has been undertaken for the off-site mine shaft:

- Geo Investigate – 2nd CMRA Follow-On Rotary Drilling Investigator. Dated 19 November 2025. Reference G25382.

Having read the above report it was noted that 28 rotary boreholes have been drilled at the site. It is possible that this work may have compromised the remediation works previously undertaken and we have significant concerns that need to be addressed:

- The drilling at the site will have drilled through the engineered clean cover system, including warning membrane.
- Arisings from the boreholes could have contamination present, how were the arisings managed and how were the borehole voids reinstated to ensure the integrity of the engineered cover system? What happened to any surplus arisings?
- Those boreholes where installations were installed, have they been decommissioned?
- The boreholes may have created a mines gas risk, has this been considered?

The Contaminated Land Team requires the information, detailed above, to be submitted for our written approval pre-determination of the application as well as further information to address the concerns regarding the rotary drilling investigation that was undertaken. If this information is not provided, to our satisfaction, then we recommend refusal.

Should you have any queries regarding the above then please contact me on Ext. 8773.



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Stacey Inglis
Contaminated Land Officer