MEMORANDUM

From:	Angela Roberts Contaminated Land Officer	**To:**	Jenni Perkins Senior Planning Officer
Our Ref:	P/2026/0625	**Your Ref:**	P/2026/0625
Date:	06 November 2026	**No. of Pages:**	5

TOWN AND COUNTRY PLANNING ACT 1990

P/2026/0625 LAND AT WREXHAM ROAD, RHOSTYLLEN, WREXHAM, LL14 4DH

ERECTION OF 8 DWELLINGS

The following reports were provided by SG Estates to the Contaminated Land Team prior to the planning application being submitted, all relevant comments from liaison with the developer at that time are detailed below.

i. REFA, Proposed Residential Development, MG Garage, Wrexham Road, Rhostyllen, Wrexham for SG Estates Ltd, May 2024, Final Report, GeoEnvironmental Investigation Report, 23156/GEIR/02
ii. REFA, Remediation Strategy for Proposed Residential Development, MG Garage, Wrexham Road, Rhostyllen, Wrexham for SG Estates Ltd, October 2025, Remediation Strategy, 23156/REM/04

1. The Remediation Strategy is sufficient in principle – noting it was intended to detail the minimum amount of work which will be required for the proposed development (paragraph 1.6).

2. It is agreed that the three fuel tanks and associated fuel pipelines and interceptor tanks need to be removed by a specialist contractor (paragraph 4.1 of the Remediation Strategy). It is stated that they have been infilled with liquidised sand, but that only one of the tanks was reportedly drained, so it is possible the other two may still contain fuel. The methodology for removal needs to account for fuel still being present and mitigation measures put in place to remove/reduce any risk of leaks or spills taking place during their removal. The same care would also apply to the removal of the interceptor tank and any associated infrastructure such as pipework. An appropriately qualified, specialist contractor would be experienced in tackling this type of situation. Relevant guidance should be considered, such as the:
- Welsh Government ‘Groundwater protection codes for Wales – Underground storage tanks’, February 2017; and

- EPIC ‘Before you dig: What’s beneath your feet? Garages and Filling Stations – A guide for developers’ Version 2.0, October 2023.

All remediation works will also need to allow for unforeseen infrastructure and contamination being uncovered.

3. As detailed in Section 7 all remediation works should be documented in a Validation Report, to include an accurate record of the locations of the removed services and tanks, relevant certificates, photographs and test results. A photographic record of the removal of the tanks and interceptor (and any other infrastructure) is particularly important. In addition, an accurate record of the materials excavated and removed including details of where the materials are disposed of should be kept i.e. waste transfer notes and included within the Validation Report. The importation of any soil that is to form the clean cover system will require testing to demonstrate it is suitable. Details of its origin will also be required. The testing regime of the clean cover materials will be no less strict than that outlined in the WLGA/CLILC ‘Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems’ guidance.

4. Following the tank removal it is detailed in paragraph 4.1 of the Remediation Strategy that further assessment of the side walls and base of the excavation of the tanks and pipeline areas will be tested for VOCs using a PID, in addition further chemical sampling will also take place to confirm whether any residual contamination is present. I can confirm I agree with this, although the amount of testing hasn’t been specified, you should ensure it is sufficient to demonstrate there is no residual contamination. If areas of suspected leaks are identified then further, more detailed investigation, will be required.

In correspondence, SG Estates have confirmed it is their intention for REFA to liaise with the Contaminated Land Team during the remediation works to ensure we are satisfied with the remediation being undertaken prior to the backfilling of any excavations, we welcome this approach. If an Officer is available, we can visit the site too.

5. The Geo-Environmental Investigation Report identifies several elevated contaminants which are noted as being in various localities across the site and that due to the quantity and widespread contamination across the whole site area remediation is required. I agree with this, but it should be recognised that there is a risk that more significant, as yet unidentified, contamination could be present at the site, specifically the petrol filling station forecourt where no investigation has taken place (the closest investigation position is WS03 and significant contamination was identified there). Paragraph 9.2.2 states “… WS03 in close proximity to the historical fuel tanks 1 and 2. These elevated hydrocarbon levels could potentially show a historical underground leak has occurred. It would be prudent to undertake further investigation and sampling in this area to positively confirm if a leak has occurred and if so, to what extent”. The contamination may also be because of incidents on the forecourt too. It is accepted that access was limited at the time of the investigation (paragraph 4.2.2). The proposed site layout (as detailed on Drawing No: WR2-SAL-A1-ZZDR-A-0607 Revision P10, Proposed Site Layout Phases 2B-4) indicates that area will comprise a shared private drive to some of the new houses, even though the development of this area may comprise hardstanding it still requires thorough assessment. Underground storage tanks 1 and 2 are in that area and will be removed as part of the remediation works, but it is possible contamination from fuel line leaks, forecourt spillages, or tanker filling point spillages may be present in and around the area of the pumps. Furthermore, a channel is stated as appearing to discharge to ground on the REFA Drawing

No: 23156/03 dated 04.03.24 ‘Chemical Exceedances Location Plan’ in the Geo-Environmental Investigation Report. The site drainage is not discussed in detail, although reference to the interceptor tank is made and it is shown on the plan too. Further assessment of the potential for ground contamination because of any contaminants in the channel should also be undertaken.

Whilst further investigation works are required (e.g. in the forecourt and channel) I previously confirmed it is not necessary to revise the Remediation Strategy again, as an additional statement can be prepared on the findings and include any revisions to the Remediation Strategy which are required. A report on the additional investigation works and revisions to the Remediation Strategy would need to be submitted to the Council for approval. The Validation Report can then bring everything together - briefly summarising all investigation works undertaken and remediation measures agreed, before detailing the validation undertaken.

6. In addition to 5. above, there is the possibility of other areas of contamination at the site which have not been covered in much detail e.g. the general maintenance and repair of cars will mean the garage workshop and yard area will have had numerous other bulk fluids such as oils, antifreeze, brake fluids, solvents and degreasers, paints, thinners, lead acid batteries. Also, the garage specialised in classic cars so asbestos lined brake pads may have been handled and stored there. In addition to spills and leaks associated with this work, there would also be waste arisings too, and a dedicated waste storage area may have been used. The REFA Geo-Environmental Investigation Report does state “Two single storey buildings are present towards the north, extending southwards onto a possible former storage area. This area towards the south contains worn macadam surfaces with evidence of stripped cars and parts. The surfacing across the site comprises of both macadam and concrete hardstanding.” It is recommended that close attention is given to the ground conditions when the hardstanding in this area of the site is removed and details of this provided in the Validation Report to support any conclusions drawn. Should any ground be uncovered which requires further investigation then this should undertaken and reported to the Contaminated Land Team for consideration.

Regarding 5. & 6. above, in other correspondence, SG Estates have stated that, as yet unidentified contamination present due to limited access at the time of the investigation or areas where limited investigation was undertaken, will be picked up during the remediation works. This is acceptable on the basis that the remediation works may to some extent resolve the potential concern, and that in the process of those works it will be evaluated.

7. The final bullet point of paragraph 4.5 and paragraph 4.7 of the Remediation Strategy refers to the identification of any suspicious or unusual ground conditions. Also paragraph 10.2.2 states “If any unusual or suspicious strata or ground conditions are encountered during the subsequent site stripping preparation work, it will be necessary for these areas to be bought to the attention of the appropriate authorities so that all necessary inspection, sampling and testing may be undertaken to determine whether these materials present a hazard to human health.” I agree that discussion will be required with the Contaminated Land Team so agreement on any remedial measures required can be reached.

8. The Remediation Strategy states that in areas where hardstanding and structures will be present then the made ground in those areas can remain in situ, this may be appropriate however it will depend on the contamination status of the made ground that is yet to be assessed, as unacceptable impacts may still occur such as: impacts on service lines/water

supply pipes that may run through such an area, the potential for vapour impacts or the risk that the contamination may migrate and impact surrounding soils.

9. The 450mm of clean cover proposed for the public open space area on the north western boundary (referred to in paragraph 4.4 of the Remediation Strategy) is considered sufficient.

10. New water supply pipes for the properties are likely to require protection in case of any residual hydrocarbon contamination from previously unidentified isolated pockets of ground. This should be considered further and advice sought from the water supplier if needed. If specialist pipes are not to be used in the proposed development then details of the assessment which came to that conclusion should be provided to the Contaminated Land Team for review and approval. Otherwise if specialist pipes are used then the installation of those should be detailed in the Validation Report.

11. The gas risk assessment has indicated the site and proposed development would be classified as Characteristic Situation 1, I can confirm that I have no concerns with this. Olfactory evidence, PID readings and some VOC & sVOC results indicate there is hydrocarbon vapour contamination but the site investigation concludes there is no human health risk. At this time until further assessment of the filling station forecourt has been completed, I consider that the vapour risks have not been fully characterised.

12. Although it is noted that the nearest hydrological feature (the Glan yr Afon Brook) is 295m away and the drift and solid geology are not Principal aquifers, they are both Secondary A aquifers. Geological mapping held by the Council indicates there is a significant depth of superficial deposits which comprise till (albeit with sand, silt and gravel too). It is stated in paragraph 3.3 of the Remediation Strategy 'A semi-quantitative controlled waters risk assessment will be conducted based on the verification results with consideration given to aqueous solubility and/or mobility of hydrocarbon compounds in groundwater to assess potential risks." Until the further assessment works have been completed it is not possible to confirm at this stage that there are no concerns in relation to controlled waters, however as remediation works are required then it is considered further assessment is appropriate on completion of those works. You may wish to submit the assessment prior to submitting a Validation Report because if the findings of that assessment indicate further works are required then those works would be best undertaken first. The Council will not be able to conclude the Validation Report is sufficient if there are outstanding concerns.

To ensure the further investigation works are undertaken, and any revisions to the Remediation Strategy made, along with validation of all subsequent remediation works, I would recommend that the following site specific condition and standard verification condition be applied to any future consent that may be granted.

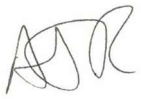
Conditions

Site Specific Condition – Remediation Strategy

Further site investigation works as detailed in the Remediation Strategy prepared by REFA dated October 2025 (ref: 23156/REM/04) should be carried out. The petrol station forecourt and the channel also require further investigation and other areas of the site with limited assessment require consideration at the time of breaking out existing hardstanding. The findings of all such further works should be submitted to and approved in writing by the Local Planning Authority. No further development of those areas shall commence until a scheme

specifying the measures that will be taken to remediate those areas to render them suitable for the development hereby permitted is submitted to and approved in writing by the local planning authority, this can be an addendum or revision to the existing Remediation Strategy. The site shall thereafter be remediated in accordance with the approved scheme.
If during the course of development any further additional contamination is found, no further development shall take place on those parts of the site 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.

WCBC02: ZP02A - Verification 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