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CC: Gemma James, National Resources Wales

CC: Abbie Brown, Caerphilly County Borough Council

Date 26.01.2026

Contact Email: adam.wilson@geo2.co.uk

Dear Elizabeth, Gemma and Abbie

25/0763/COND / Enterprise Autos / Discharge of Conditions Supplementary Letter (v2)

We have received a copy of a Decision Notice in response to a submission for Discharge of Conditions 3 and 7 (reference above) in relation to the remediation and proposed redevelopment of the Enterprise Autos site (the site), Newbridge Bypass, Crumlin, Newport. This notice refuses the discharge of these conditions and is supported by a consultation from National Resources Wales (NRW) and Caerphilly County Borough Council (Environmental Health Officer -EHO), in which provides commentary upon their concerns.

Our Client is disappointed by the decision to refuse the discharge without allowing the applicant the opportunity to respond to the concerns. This decision will slow down the proposed works which are a material component of the time limited land remediation works, the completion of which by the 31st of July 2026, are the subject of an Anti-Pollution Works Notice, served upon our Client (Ascona Retail Limited, the owner of the site) by NRW.

In this Supplementary Letter we have sought to address the stated concerns of NRW and Caerphilly County Borough Council and where possible have provided additional supporting information. We hope that the information we outline here will allow an open and constructive dialogue between the planners, NRW and Ascona, ahead of a resubmission to discharge the conditions.

We have contacted NRW to discuss the matter, but they are unable to provide a pre-application service at the current time due to a lack of resources. We would appreciate your assistance in enabling a dialogue with NRW through the formal planning system to allow this matter to be resolved.

1. Petroleum Officer Records

1.1. NRW and EHO have requested that the local Petroleum Officer (PO) be consulted. This has been undertaken and the details provided are appended to this letter.

1.2. In addition to the current known infrastructure, the PO report has identified:

- A historical small above ground storage tank at the rear of the site (A)
- A further two small Underground Storage Tanks (USTs) (B and C) located in the same tank farm as Tank 3 (known to have failed) and Tank 4. These historical tanks are understood to have been decommissioned with a concrete fill. It is unknown whether they remain in situ.

Each of these features is shown on Figure 1, below, which georeferences the sketched locations against the existing investigation data. Please note that the PO records are not to scale and extents are inferred only.

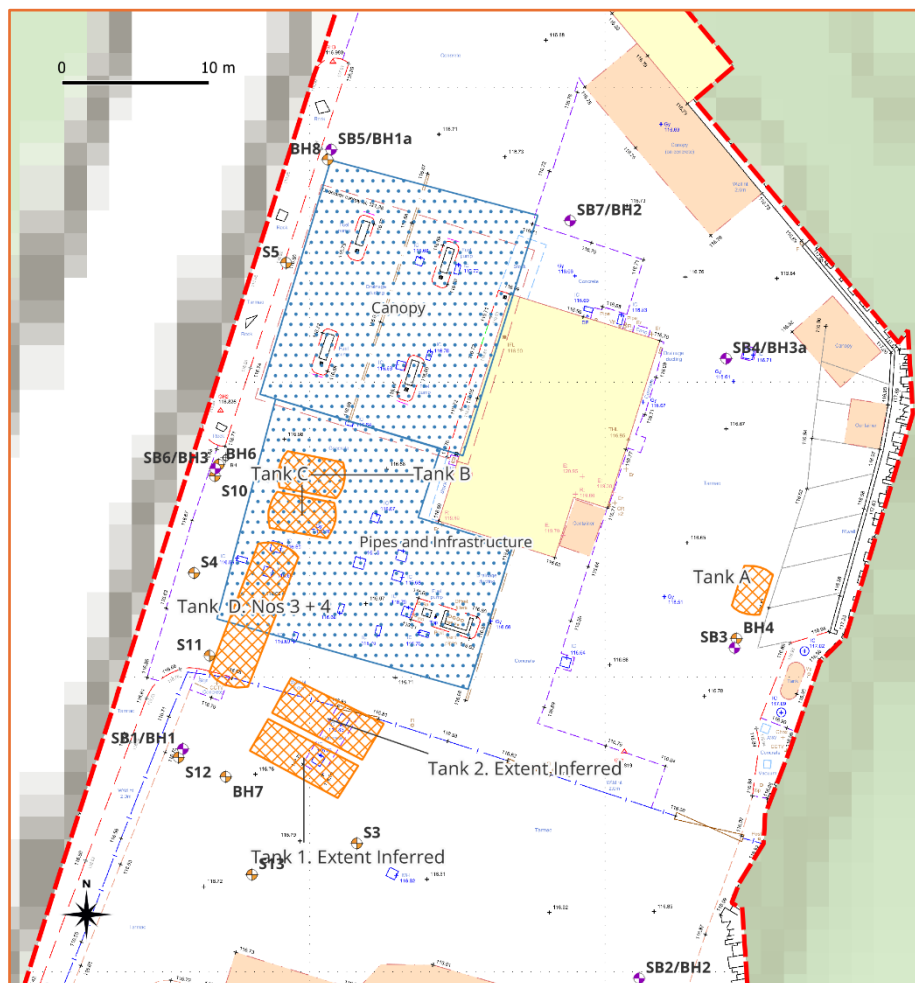


Figure 1. Site Plan showing approx locations of Petroleum Officer identified tanks (A, B and C), investigation locations and constraints (dotted in blue)

2. Targeting of Contaminant Sources

- 2.1. The principal concern raised by both NRW and the EHO relate to provision of a ‘robust risk assessment in line with LCRM guidance’. NRW do not agree that the investigation to date has appropriately targeted the key contaminant sources.
- 2.2. Below we have revised the table from the (previously submitted) Updated Site Investigation Document adding in detail from the Petroleum Officer records and making reference to the terminology used in the NRW response. The table correlates the identified potential sources and site investigation locations which target them.
- 2.3. Given the close spatial constraints onsite numerous potential point sources have been grouped together.

Investigation Location	Forecourt, pump islands and fuel lines (inc. Historic USTs B-C)	Tank Farm (Tanks 1-2)	Historic AST (Tank A)	Tanks 3 & 4, Interceptors	Offset fill points, HGV pump island vent and fuel lines.	Quarry / General Coverage	Former Garage and Carwash
BH1		X					
SB7 / BH2	X						
BH3				X		X	
SB3 / BH4			X			X	
SB6 / BH6	X			X			
SB1 / BH7		X		X		X	X
SB5 / BH8	X						
SB2						X	
SB4				X	X	X	
S3		X			X		X
S4						X	
S5	X						
S10				X			
S11				X	X		
S12							X
S13		X					X

Table 1. Updated Point Source Targeting

- 2.4. Geo² consider that all identified sources have been suitably targeted by the investigation. The information provided by the Petroleum Officer does not merit any amendment to the conceptual site model as key features, where physically practicable with the site in its current form, have already been targeted by investigation points.
- 2.5. Geo² accept that data gaps remain around heavily constrained locations as was presented in the Proposed Investigation Plan (presented to NRW on 2.5.25) and has been reiterated in the Updated SI Report (Sept '25 Section 5.3.4), which principally includes the forecourt and tank farm areas. Suitable drilling techniques to reach the groundwater in the bedrock cannot fit beneath the canopy and the practical constraints of drilling around live underground fuel storage and distribution infrastructure make investigation in the key areas of interest unsafe.
- 2.6. Further investigation of the site, in advance of any demolition to remove the constraints, is considered very unlikely to provide further information which would reduce this uncertainty.

- 2.7. The limited data gaps and modest level of uncertainty are considered insufficient to present a risk to the conceptual understanding of the site and the effectiveness of the remedial solution presented to address the impact.
- 2.8. Geo² also consider that, were further gap-filling investigation to be undertaken post-demolition, it would not change the conceptual site model, nor the remediation approach. The remediation strategy as presented is therefore suitable to achieve the stated objectives without further data.
- 2.9. Where appropriate further clarification to directly address NRW comments and concerns in respect of this objective has been included overleaf.

3. Remediation of Impact Around the Tanks During Excavation

- 3.1. In advance of demolition the pumped barrier would be installed and operated.
- 3.2. The demolition works preceding the remediation would require the draining and making safe of all fuel storage and distribution infrastructure in accordance with best practice by appropriate specialists. This would remove all risk of contaminant release from lines, pumps and tanks during removal.
- 3.3. Once complete, the forecourt infrastructure and canopy would be removed to ground level. At this point the forecourt and hardstanding would be excavated to remove the fuel lines and to expose the tank tops from all tanks (including historical ones), this would provide information of the manner of installation of the tanks (i.e. are these surrounded with concrete, bunded etc) and the safest manner of removal.
- 3.4. Once removal commences this would allow an assessment of the surrounding soils and shallow pooled water or LNAPL around the tank/s. Any pooled liquid can be pumped directly into the treatment system for quarantine or separation and treatment, or should this be considered unsuitable (extreme LNAPL volume or very high sediment concentration) this may be removed from site using a vacuum tanker.
- 3.5. Impacted soils would be excavated and quarantined onsite (at least 8m away from any unsealed drain) and within an impermeable bund or skip. Excavation would be continued, overseen by an appropriately trained environmental scientist, removing impacted soils and liquids until the source has been removed, within the unsaturated zone as specified within the strategy.
- 3.6. Soils will be disposed of offsite to an appropriate facility following completion of appropriate waste characterisation.
- 3.7. It is not feasible to continue the excavation into the bedrock, any impact within the bedrock will be predominantly present within the groundwater within fractures, this impact will fall within the influence of the treatment system, and the success of the treatment will be demonstrated using the remedial objectives set out in the Remediation Strategy document.

4. Contingency

- 4.1. It is reasonable to make a contingent allowance for the following scenarios:
- 4.2. That shallow excavation of the tanks encounters either gross LNAPL or buried structures (potentially including historical tanks B and C or a more porous backfill in this area) which provides a shallow sump of LNAPL. In this instance the soils will be excavated as detailed in the strategy and as additionally outlined above.
- 4.3. Should impact extend below the footprint of former buildings this will also be chased out. Further impact hydraulically upgradient or under the cliffs at the rear of the site is not considered feasible.
- 4.4. Where impact has followed utility trenches or preferential pathways these will be excavated entirely and verified appropriately. Should any preferential pathway extend offsite this will be chased out to the limits of the boundary and verification samples from the outward face of the excavation would be collected for further risk assessment.
- 4.5. Where impact extends into the bedrock (encountered as a gravel at shallow depth) this will be excavated where feasible or be treated by the pumped recovery system.
- 4.6. Any impacted water encountered at any point on the site can be addressed using the treatment plant or be uplifted (if suitably localised) by vacuum tanker.
- 4.7. Verification of the above would be delivered through sampling of the extents of the final excavation from superficial deposits or would be demonstrated through the presented groundwater monitoring associated with the pumped treatment system.

5. Verification of Excavation

- 5.1. Given the commercial use of the site, the target values stated in Table 5 (of the Remediation Strategy v3) should be adopted for comparison of soil samples collected from the sides and base of the tank farm excavation (or other area of excavation should contaminated material extend beyond this area).
- 5.2. The target values proposed for comparison to soil samples around the unsaturated source zone, and in any other location where unexpected contamination is encountered meet the human health risk generic assessment criteria (S4UL and C4SL) and therefore following completion of remediation the verification report will demonstrate to the regulator that no human health risk when the site is newly operational remains from any residual impact.
- 5.3. Should any soil samples exceed the target criteria the material should either;
 - be further removed until the testing indicates that the risk has been removed, or,
 - where appropriate the residual risk should be addressed by Geo² where removal is considered unfeasible, unsafe or unnecessary; any such assessment would be documented and provided to the regulator.
- 5.4. Where material is required for backfilling of excavations, this will be sourced from either a virgin source or from a supplier of recycled crush. Any source of material will be subject to a

programme of testing at a frequency of 1 sample per 100m³, with a minimum of three samples. Samples will be tested for a scope of contaminants as proposed in the YALPAG guidance, which will comprise, Asbestos, Heavy Metals (extended suite) and PAH and must be compliant with the engineer's specification for compaction.

- 5.5. Any potable water supply pipe must comply with the water utility company risk assessment which is likely to insist upon the installation of a chemical resistant barrier pipe.
- 5.6. This approach will ensure that no residual risk remains in the unsaturated zone.

6. Verification of Groundwater Remediation

- 6.1. NRW have stated that the objectives of the remediation should be to achieve a 'pre spill condition' in accordance with the LCRM guidance. The standards of this clean up significant exceed the remediation target values calculated by a site-specific assessment of groundwater risk undertaken using the Remediation Targets Methodology Worksheet (the approach which would normally adopted in an 'existing contamination' scenario), as the Environmental Quality Standard to be protective of the receptor is adopted onsite, this does not consider the effects of degradation, retardation and dilution within the aquifer. .

7. Proposed Future Fuel Storage Infrastructure Installation

- 7.1. The architects (C&A Design) have planned for the incorporation of a membrane lined cell and Fuel Storage Risk Assessment compliance fuel installation into the design. The design of the tanks, surrounding material and monitoring wells follows the recommendations of the APEA Blue Book (5th Edition.)
- 7.2. Geo² have appended to this letter documentation and diagrams (See Forecourt Sections of the Tank Installation Detail attachment), C&A Design have confirmed that 2No monitoring wells will be installed within the pea shingle backfill within the tank chamber to the top of the concrete base, in opposite corners of the installation, to permit monitoring (as shown on the Proposed Scope of Works Plan).
- 7.3. The EHO has highlighted a concern that with respect to risks posed to human health receptors, namely site users and the public, associated with the newly operation site. A Proposed Fuel Storage Risk Assessment has been previously issued which establishes the risk and informs the suitability of the proposed fuel storage infrastructure for use beneath the site. A copy of this has been appended to this letter for convenience.

8. Drainage Connections to the River Ebbw

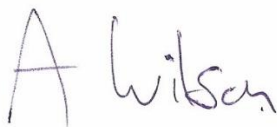
- 8.1. A drainage survey completed by Alpine Land Surveyors (appended to this letter) shows the route of the surface water discharge from the site, which has been verified through a camera survey. This follows the road to the south of the site and then crosses beneath the road and discharge directly into the River Ebbw

9. Conclusion

- 9.1. Geo² consider that the conceptual model presented in the Updated Si Report and Remediation Strategy (v3), from September and October 2025 and previously submitted, provides a robust assessment of the ground risks. Accepting the uncertainty presented in the model around the inaccessible areas of the site, it is Geo² opinion that all reasonable measures to characterise the impact have been taken.
- 9.2. Whilst it must be accepted that LNAPL (fuel) has not been encountered beneath the site, the established model and risk assessment uses a lines of evidence based approach developed from groundwater sampling taken over a period of one year, hydraulic modelling, onsite pump testing, details provided by the tank inspection engineers and now with input from the Petroleum Officer. As a result of this assessment, it is considered highly unlikely that the contaminant distribution onsite will differ from that presented in the Conceptual Model.
- 9.3. Geo² have no notable evidence to support an alternative conceptual understanding of the site.
- 9.4. It is considered that the contingency provided within the Remediation Strategy is sufficient to ensure that the objectives of the remediation can be achieved. It should be noted that the objectives of this remediation go beyond the standard of cleanup required under planning to demonstrate no risk is poised as a result of the development.
- 9.5. Geo² request that the additional information provided here be taken into consideration in respect of the details required to address Conditions 3 and 7.

If you have any further queries, we would welcome the opportunity to discuss these to ensure that we are able to expedite an appropriate and timely pollution response.

Yours sincerely,

A handwritten signature in blue ink that reads "A Wilson".

Adam Wilson

Geo² Remediation Limited