

Comments on the Minerals Safeguarding Assessment supporting the submitted application:

Proposed Installation of an Underground Electric Connection Cable On Land South Of Cefn Road, Wrexham.

P/2023/0752 - LAND NORTH OF MAELOR WORKS - Cable route

Introduction

Innova Renewables Limited have prepared the Minerals Safeguarding Assessment dated February 2024 in response to Local Authority request.

Innova Renewables have submitted an application for the installation of a buried high voltage cable. The cable is proposed to run from the substation at Cefn Solar farm to the west (National Grid Reference SJ37784825) to Wrexham Solar Farm to the east (SJ36824858) for a distance of approx. 1km.

The site is located to the south east of Wrexham, south of Cefn Road connecting the two solar sites either side of Sesswick Way. The cable development corridor mainly comprises numerous fields, and adjacent roads.

The majority of Wrexham is underlain by sand and gravel which has been sterilised by non-mineral development. The published geological plans in this area show the development corridor to be underlain partially by glacial sand and gravel deposits, partially by clay and silt.

Policy Framework

Planning Policy Wales (Edition 12, February 2024) paragraph 5.14.7 states that *“it is important that access to mineral resources, including secondary, recycled and marine dredged materials, which society may need, as well as the minerals related infrastructure to deliver this need, is safeguarded in order to prevent sterilisation by other forms of permanent development. Planning authorities should consider the long term and the need for preventative action to avoid the creation of problems in the future. Safeguarding does not indicate an acceptance of mineral working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”*

Minerals Technical Advice Note 1: Aggregates, paragraph 32 states (in relation to sand and gravel) *“resources must be safeguarded for possible use by future generations.”*

The Welsh Government has issued a letter to Chief Planning Officers, dated 14 November 2012, which highlights that a national aggregates safeguarding map has been published. The letter goes on to advise that *“the Aggregate Safeguarding Map of Wales provides a key evidence base for Local Development Plan preparation, enabling plan strategies to fully recognise the importance of mineral resources and to avoid their unnecessary sterilisation.”*

The map is accompanied by a technical guide which explains how the maps have been derived and identifies the categorisation of different mineral resources. Sand and gravel resources, specifically glacio-fluvial, brown sand and river terrace sand and gravel deposits are identified as Category 1 resources which are *“those resources that have a national importance in Wales (and in some cases the UK)”*.

Although policy and guidance regarding safeguarding is limited, this is interpreted to mean that the main aim of policy is to prevent sterilisation of resources, and where not possible, ensure that mineral is extracted in advance of non-mineral development where possible. There is no guidance on how much of that mineral should be extracted prior to the non-mineral development.

Wrexham Local development Plan (2013 – 2028) adopted in December 2023 reference Policy MW1 relates to minerals safeguarding and states:

“Non-mineral development within Mineral Safeguarding Areas as defined on the proposals map will only be permitted where it can be demonstrated that:

- i. The mineral underlying the site does not merit extraction; or*
- ii. The need for the non-mineral development outweighs the need to protect the resource; or*
- iii. The mineral can be satisfactorily extracted prior to the non-mineral development; or*
- iv. The development is of a temporary nature or can be removed within the timescales within which the mineral is likely to be needed; and*
- v. Essential infrastructure that supports the supply of minerals would not be compromised or would be provided elsewhere;*

All applications for development in these areas shall be supported by a Mineral Safeguarding Assessment.

Proposals for non-mineral development on allocated sites of 4ha or more and which are underlain by Category 1 sand and gravel shall be supported by a Prior Extraction Assessment.”

Given the scale of the area of development it is not necessary to submit a Prior Extraction Assessment.

Consideration of the Minerals Safeguarding Assessment

The applicant has prepared a Minerals Safeguarding Assessment to accompany the planning application in accordance with Wrexham’s SP16 and MW1 safeguarding policy. The assessment has concluded that:

- need to generate electricity from low carbon and renewable energy results in this development potentially meeting the test of overriding need;
- the temporary nature of this development can ensure that mineral extraction may still be viable in the future; and
- Mineral extraction would be unlikely to extend closer to the river than the proposed cable route and would therefore not be sterilising any minerals.

Conclusion

It is considered that the submitted Minerals Safeguarding Assessment provides sufficient information to enable the Local Planning Authority to establish whether the proposed development meets the criteria Policy SP16 and MW1.

It is considered that any sterilisation of mineral that may occur as a result of this development is not sufficient in quantity to override the need for the cable and its association with delivery of low carbon and renewable energy. The operation of the solar development for a limited period of 40 years will mean that any viable material would not have been permanently sterilised. Finally, the likelihood of this site specific narrow corridor of being actively worked for mineral extraction is low by nature of its position and route with the field.

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