Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-286427-T0Y0
Eich cyf/Your ref: P/2024/1151

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 10 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: RHYDDHAU AMOD 7 (HALOGIAD) CANIATÂD CYNLLUNIO P/2021/0676/DISCHARGE OF CONDITION 7 (CONTAMINATION) OF PLANNING PERMISSION P/2021/0676

LLEOLIAD/LOCATION: LAND NORTH EAST OF MAELOR WORKS, CROSS LANES, WREXHAM, LL13 0UW

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the additional information for the above, which we received on 17 February 2025.

We continue to have concerns with the application as submitted. We do not recommend your Authority discharges condition 7 for the following reasons.

Condition 7

We have reviewed the additional information 'Supplementary Phase II Site Investigation on land at Proposed Solar Farm' (reference GSI 2006 DE PII Report V1 dated August 2025, GeoCon Site Investigations Ltd) submitted in support of this discharge of conditions application. The site is considered to be of high sensitivity as it lies above a Source Protection Zone (SPZ) and Principal Aquifer.

Following our review of the submitted report, we have the following comments:

- It appears that only one round of groundwater monitoring was performed. This was in July 2025 which is considered to be the drier period of the year. We have provided previous advice via email (02/07/2025) recommended at least x2 monitoring rounds as a minimum.
- Only glycols were analysed for as indicators for munition/ordnance residue. The reliance on just this suite was previously queried in terms of whether this suite was sufficient to assess for the presence of munitions/ordnance residues.
- If the samples above represent glycol concentrations in groundwater, notably sample 107160 with all glycols analysed for being detected, these concentrations are considered significant (total summed) as they are in mg/L. Their presence must be further investigated as there may be a sizeable source of munitions pollution at the

site. If the samples represent surface water, this is potentially of greater concern as these are concentrations detected in flowing surface water and would therefore indicate that there is a seeping source of residual munitions pollution entering the water course from the site and this would be occurring over a considerable distance through the superficial deposits to the water course.

We recommend that further information should be submitted in support of this discharge of condition application:

- At least one additional monitoring round of groundwater and surface water is required.
- Further investigation of the site is required to assess the significance of the glycols that have been detected.
- Additional chemicals indicative of pollutants associated with residual munitions should be sampled for. For example, TNT, DNAN and perchlorate and other chemicals associated with munitions/ordnance facilities should be considered. There are other chemicals that may be more directed to what was stored/used and manufactured at the site in question. Where information on the specific historic uses is available, this should be clearly referenced to justify the sampling undertaken.

Please also refer to the following guidance. Land Contamination: Land contamination Techical Guidance on Special Sites: Explosives Manufacturing and Processing Sites

Based on the above, we don't recommend that Condition 7 is discharged until the recommendations for further survey and analysis as detailed above have been completed and submitted to the Local Planning Authority.

Advice for the Developer

Please note that groundwater dewatering is a licenced activity if volumes greater than 20m^3/day of groundwater are needed to be pumped and is subject to applying to NRW for a Groundwater Investigation Consent (GIC) which is needed to obtain a groundwater abstraction licence. A Hydrogeological Impact Appraisal (HIA) will also be required to support any groundwater abstraction licence application.

Please also refer to GP3 – Groundwater Protection which was re-published in 2018: The Environment Agency's approach to groundwater protection (publishing.service.gov.uk). Although it is currently being reviewed for an update, the current version contains a section on Infrastructure which includes guidance on buried high voltage cables, notably in relation to the depth to groundwater.

We note that operational infrastructure beyond just solar panels is proposed on the eastern side of the site, including an attenuation swale, 0.5m below ground level (southern boundary of Field 1B). These are a SuDs design feature, and the SuDs Approval Board (SAB) should be consulted on the design of the swale given potential constraints arising from a high groundwater table and the unknown groundwater quality within which the swale will be operating.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is

published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Rachael Burke
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.