Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-291894-P6G1
Eich cyf/Your ref: P/2025/0796

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 18 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Newid defnydd tir i ffurfio estyniad i'r fynwent bresennol / Change of use of land to form extension to existing cemetery

LLEOLIAD/LOCATION: Cemetery, Church Road, Overton, Wrexham, LL13 0EN

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 29 October 2025.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding pollution of controlled waters. If this information is not provided, we would object to this planning application. Further details are provided below.

Pollution of Controlled Waters

The proposed cemetery extension is located on Kinnerston Sandstone which has been designated a Principal aquifer and regionally important for public (potable) water supplies and vulnerable to pollution. We therefore consider the site setting as highly sensitive with respect to controlled waters.

Cemeteries have the potential to cause pollution of controlled waters. The degree of risk is dependent on many factors and each proposal must be considered on a site-specific basis. In order to assess the potential impacts, we advise that the following information is submitted in support of the proposal.

The following links are provided for guidance:

- https://www.gov.uk/guidance/cemeteries-and-burials-prevent-groundwater-pollution - this link states the information has been withdrawn, but the content is still useful – it has been withdrawn for England not in Wales.

- https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments
- This link is to guidance has been withdrawn by GOV.UK (March 2017), but is a useful overview of the process that should be followed and the comments below are

based on this guidance. https://www.gov.uk/government/publications/assessing-the-groundwater-pollution-potential-of-cemeteries-3rd-edition

Please note; guidance from the Environment Agency advises that an Environmental Permit is required for cemetery developments, however, currently no permit is required in Wales.

Stage 1 – Preliminary Risk Assessment

The initial site assessment should define potential pathways and receptors in proximity to the site.

The developer must undertake a preliminary site assessment, which should include the following:

- Identification of all water features both surface and groundwater (ponds, springs, ditches, culverts etc.) within a 300 metres radius of the site - see below for more details on water feature survey.
- Details of the thickness and type of soils and rocks underlying the site
- Confirmation of the depth of the water table (especially with respect to the maximum depth of burial) and its variability
- The anticipated rate of burial.

Water Feature Survey details

The developer must undertake a preliminary site assessment, which should include the following:

- Identification of all water features both surface and groundwater (ponds, springs, ditches, culverts etc.) within a 300 metres radius of the site.
- Use made of any of these water features. This should include the construction details of wells and boreholes and details of the lithology into which they are installed;
- An indication of the flow regime in the spring or surface water feature, for example whether or not the water feature flows throughout the year or dries up during summer months;
- Accessibility to the spring/well;
- This information should be identified on a suitably scaled map (i.e. 1:10,000), tabulated and submitted to Natural Resources Wales. It would be useful for the developer to photograph each of the identified water features during the survey.

Based on the results of the survey the applicant must assess the likely impacts from the development on both quantity and quality of the surface water and groundwater. This should take into consideration both the preferred methods of construction and the assumed hydrogeology in the vicinity of the development.

Natural Resources Wales may require identified groundwater features to be monitored during the proposed workings. We would therefore recommend that the survey be undertaken as soon as possible to enable the developer to carry out suitable baseline monitoring prior to the commencement of workings at the site.

Stage 2 – Determination of the appropriate level of risk assessment

Where a proposal is considered to pose a potential ‘intermediate to high’ risk a more detailed site investigation and risk assessment is required (a Tier 2 assessment). This

must demonstrate that there is no impact on groundwater by hazardous substances and no adverse effect from non-hazardous pollutants.

For further details the applicant is referred to Section 5.3 (c) of the guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/598863/str-p223-e-e.pdf (the document is classed as withdrawn however the information referred to is still valid).

A Tier 2 assessment requires that baseline data be collected with respect to groundwater quality and quantity and we request that these requirements are met prior to granting planning permission.

With reference to the guidance, this should include installation of a minimum of 3 monitoring boreholes (one up gradient and 2 close to the down gradient boundary of the site), monthly water level and quarterly groundwater quality monitoring and the use of this data with a simple pollutant flux and water balance calculation to assess the potential risk to groundwater quality from the proposed woodland burial site.

A hydrogeological conceptual model must be produced, based on the information collected in the site investigation, that considers the likely pollutant loading source, potential pathways and potential receptors (including the underlying groundwater and possible discharge to surface water features). For this we would strongly recommend reference to the methodology outlined in 'Pollution Potential of Cemeteries', R&D Technical Report P223 (1999). As discussed, the assessment should show that no impact on groundwater will occur, or, at worst, that the impact would not amount to pollution as defined in the Environmental Permitting Regulations 2016.

Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation (22 October 2025), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

We refer you to our comments above regarding further information being submitted in relation to the pollution of controlled waters and therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

Other Matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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 about 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.