

Comments on the Planning Response Letter dated 18th November 2024
Ref: 14-854-L2-RevA by Redrow Homes supporting the Proposed Development at
Land at Ruthin Road, Wrexham

E3P have prepared a Planning Response Letter dated 18th November 2024
Ref: 14-854-L2-RevA on behalf of Redrow Homes in response to comments made by
North Wales Minerals and Waste Planning Service dated 30.10.2024.

The letter advises that a site investigation in the northwest of the site has been carried out and based on log data and over an area of 76 ha (764406.5 m²) the following figures represent a best-case scenario in terms of volume of material on site:

- Sand: 152,881 m³
- Clay: 1,223,050 m³
- Gravel: 152,881 m³

The report comments that:

“this number assumes full extraction boundary to boundary where in reality a buffer would be applied and some level of battering to make safe and slope at the boundary would further reduce the recoverable mass. As such it is realistic to suggest that these figures could see a reduction up to 50% whereby the viability becomes greatly reduced and less likely to be effective”.

It is agreed that a buffer would be applied and some level of battering would reduce the recoverable mass. It is not agreed that this could reduce material by up to 50%.

Sand and gravel are the valuable resources within this deposit. A conversion factor of 1.77 metric tonnes per cubic metre in gravel and between 1.54 – 1.78 metric tonnes per cubic metre for varying types of sand may be applied. On conservative estimates the deposit could therefor represent:

- Sand: 235,437 tonnes
- Gravel: 270,560 tonnes

A total resource of 507,997 tonnes could be economically viable, should 40% be lost due to a buffer and battering a total resource of 203,199 tonnes could provide a likely conservative estimate of total valuable resource.

The report comments that:

“as far as practicable, sustainable best practices would be employed during the works to retain all materials available on-site and manage them to ensure those with geotechnical properties are used in highways and plots with others retained for landscaping”. This is supported. It also comments that: *“It is the developers intention,*

where practicable, to employ the most sustainable practices during the development which would include the retention of materials deemed necessary for excavation to utilise elsewhere within the construction of the development. The site will be constructed in phases in order to maximise the use of site won materials with material types segregated”.

Conclusion

Given the above it is considered necessary and proportionate to request additional information be supplied. Information should provide:

- i.* a method for ensuring that minerals that can be viably recovered during the development operations are recovered and put to beneficial use; and
- ii.* a method to record the quantity of recovered mineral (re-use on site or off site) and to report this data to the Mineral Planning Authority

This information could be provided as part of a broader condition relating to construction management plans (or similar).

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