Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-294840-N7K4
Eich cyf/Your ref: P/2025/0897

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 24 December 2025

Dear Jenni Perkins,

BWRIAD/PROPOSAL: DEMOLITION OF FORMER WEIGHBRIDGE BUILDING AND ERECTION OF BUILDING FOR USE AS A WELFARE BUILDING FOR STAFF/USERS OF THE QUARRY

LLEOLIAD/LOCATION: FORMER WEIGHBRIDGE BUILDING, MAESYFFYNNON ROAD, MINERA, WREXHAM, LL11 3DE

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 05 December 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 protected species, foul drainage (and protected sites). If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Species

We have concerns about the above proposal and advise that further information is submitted in support of the application to assess the impacts of the proposal on bats, as European Protected Species. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We have reviewed the following information submitted in support of the application:

- Preliminary Ecological Appraisal and Preliminary Roost Assessment, Enfys Ecology, 20/10/2025

We note that the submitted report has identified that bats may be present at the application site. Section 6.3.3 of the report advises that further survey work is required in the form of “at least two (up to three) dusk emergence surveys are undertaken during the appropriate survey season (May–August inclusive)”. We concur with this advice.

We advise that the additional survey work recommended in the report is undertaken and results submitted prior to determination of the application. Surveys should be undertaken

in accordance with published best practice. If evidence of bat use is found, suitable avoidance, mitigation or compensation measures should also be provided as appropriate to the species and their use of the site.

Based on the application, as submitted, we are unable to provide your Authority with any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Protected Sites

The site lies catchment of the River Dee and Bala Lake Special Area of Conservation (SAC) and within 10 metres to the Ruabon / Llantysilio Mountains and Minera Site of Special Scientific Interest.

Special Area of Conservation (SAC)

- Foul Drainage

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 therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that the development has the potential to increase the amount of nutrients being discharged from the site. We refer to our advice noted within the foul drainage section above. We also refer you to our Advice and advise you to seek further information from the applicant. We advise you to seek further information as identified in the section titled 'What does this mean for development proposals involving private sewage treatment systems' and/or "How should the disposal of sludge from private wastewater treatment systems and portable toilets be considered in a Habitats Regulations Assessment?"

We understand that the development is not served by the public foul sewer and that the application form indicates that foul drainage is to be discharged to a private sewerage system. In these circumstances Welsh Government Circular 008/2018 advises that a full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular, to justify the use of private sewerage. In this instance, insufficient information has been submitted

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution to the water environment arising from the proposed development.

In particular, the submitted application provides contradictory information in terms of the drainage from the proposed toilet facility. We also advise that the method of foul drainage from the kitchen sink has not been confirmed.

The Proposed Plan, bhb architects, Drawing Number 4269 – 20, Rev. A, 06/05/2025 includes note 5 that confirms the installation of Kazubaloo 2 Accessible model composting

WC (www.waterlesstoilets.co.uk). However, the product brochure installation guide for that toilet facility shows a sealed cesspit installation (KL2 Accessible - WooWoo Waterless and Composting Toilets). The applicant has indicated that a composting toilet would be provided, which contradicts a cesspit method of disposing of foul drainage. We advise that the applicant confirms the method of foul drainage. Furthermore, no drainage information has been provided for the kitchen sink. We advise that the applicant confirms the kitchen sink drainage method.

The use of cesspools/cesspits is discouraged. We refer you to paragraphs 2.3-2.8 in the Welsh Government Circular 008/2018, which set out the approach to be followed.

The applicant should therefore demonstrate how they have followed the hierarchy within the Welsh Government Circular 008/2018 (July 2018).

In exceptional circumstances, where a cesspool/cesspit can be justified, the Circular advises that full, and detailed consideration be given to the environmental criteria listed under paragraph 2.6.

It is essential that any cesspit is installed correctly. Incorrectly maintained cesspools can cause pollution by contamination of the ground, groundwater and, sometimes surface water. Any damage to the fabric of the cesspool, such as cracks or holes, is difficult to detect but needs to be rectified immediately in order to prevent pollution. The cesspit should meet the requirement of British Standard BS 6297. It should be fitted with a level warning device to indicate when the tank needs emptying.

On receipt of the above information, we will review our position and advise your Authority accordingly.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We 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.

Site of Special Scientific Interest (SSSI)

The Ruabon / Llantysilio Mountains and Minera Site of Special Scientific Interest (SSSI) lies adjacent to the proposed development, with one section approximately 10 metres to the south, and another around 40 metres to the north of the site.

Based on the information submitted, we consider that the proposed development is not likely to damage the features for which Ruabon / Llantysilio Mountains and Minera SSSI is of special interest. No building materials or waste should be stored within the SSSI.
We advise the applicant to follow industry-standard pollution prevention and waste management guidelines.

Modifications to the scheme as currently proposed may affect our view and may merit a further consultation with us.

National Landscape

The development is situated within Clwydian Range and Dee Valley National Landscape / Area of Outstanding Natural Beauty (AONB). We note that there is no information regarding landscape assessments. If you require further advice, then please reconsult us.

Flood Risk

The planning application proposes less vulnerable development (quarry staff welfare building). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 Rivers.

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

We have reviewed the FCA undertaken by GCA Consulting, Flood Risk Assessment, 10620-GCA-XX-ZZ-RP-D-2001, 30th June 2025. Our advice to you is that the FCA as submitted is inadequate. No assessment has been undertaken of structures and land formation that may influence any fluvial flood regime. The FCA has failed to provide any discussion in relation to compliance with threshold levels and flood risk beyond design criteria.

However, as the proposal relates to less vulnerable redevelopment on a brownfield site, which encompasses the existing development footprint, we have no concerns.

Land Contamination

It is recommended that the requirements of Planning Policy Wales and the Land Contamination Risk Management (LCRM) guidance should be followed. These comments are based on our assumption that gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales.

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.

Yours faithfully,

Gareth Thomas
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
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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.