Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-295819-D4D0
Eich cyf/Your ref: P/2025/0796

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 06 January 2026

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 additional information for the above, which we received on 18 December 2025.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition 1: Pollution of Controlled Waters

Please note, without the inclusion of this condition 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.

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

- Proposed Cemetery Extension: Overton Cemetery, Church Road, Overton – Extended Tier-1 Risk Assessment. Smith Grant LLP, Report Ref: R3558-R01, December 2025.

We concur with the conclusions in section 6 of the report and that the site has a low environmental risk score, which combined with the low burial rate of 9 burials a year gives an overall risk scoring of low. Section 6.2.2 states that “no further works or assessment

are considered necessary based on the assessment undertaken", we concur with this statement.

However, we advise that the following condition is imposed on any planning permission granted to ensure that potential risks are adequately managed – this does not need to be discharged for each burial but included to make sure all burials conform to these criteria.

Condition: All burials in the cemetery shall be:

- a minimum of 250 m from a potable groundwater supply source;
- a minimum of 30 m from a water course or spring;
- a minimum of 10 m distance from field drains;
- no burial into standing water and the base of the grave must be above the local water table;

Justification: To protect controlled waters within and in the vicinity of the application site.

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 the advised condition 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

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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.