Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-296532-T7X5
Eich cyf/Your ref: P/2025/0952

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 20 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Erection of industrial building (washdown bay)

LLEOLIAD/LOCATION: Prysmian Cables, Oak Road, Wrexham Industrial Estate, Wrexham, LL13 9PH

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 06 January 2026.

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

We note that the site is located on land formerly used as a munitions factory, which presents an elevated risk of land contamination and potential impacts to controlled waters. No Preliminary Risk Assessment (PRA) or equivalent desk-based assessment has been submitted with the application, and therefore the nature and extent of potential contamination risks to groundwater and surface waters have not been sufficiently characterised.

We also note that the application does not provide sufficient detail regarding the proposed underground wastewater storage tank, including the depth of excavation and final installation level. In the absence of this information, it is not possible to determine whether the development will intercept the groundwater table or principal aquifer, or whether construction could create pathways for contamination migration.

In addition, the application does not include details of how drainage, treatment, collection, or discharge of stored wastewater will be managed. Without this information the potential risk to groundwater and nearby surface waters cannot be fully assessed.

We recommend that you should only grant planning permission for the scheme if it can meet the following requirements, to address significant concerns that we have identified. Provided these requirements are met, we would not object to the scheme.

We therefore advise that the following information is submitted in support of the application:

- A Preliminary Risk Assessment to address the potential risk to controlled waters associated with the site's former munitions factory use and the proposed development. We recognise that remediation may have been undertaken historically, however no information has been provided to demonstrate any such works have taken place.
- Details of the proposed underground storage tank, including excavation depth and installation level, to confirm whether the development will intercept the groundwater table or any underlying units.
- Details of wastewater management arrangements for the development, including plans for drainage, treatment, collection, or discharge.

Protected Species

No ecological information has been submitted in support of this application. We recommend you seek the advice of your Authority's ecologist about the requirement for further information to be submitted in support of the application, and to scope the need for bespoke surveys, where required.

Protected Sites and 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.

However, recognising the specific nature of the application submitted, we are satisfied that there is unlikely to be a source of additional nutrients and/or a pathway for impacts. As such, in our opinion, it would be reasonable for your Authority to screen out this proposal as not likely to have a significant effect on the River Dee and Bala Lake SAC in relation to nutrient inputs.

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.