Former Befesa Salt Slags Site, Fenns Bank, Wrexham – Fenn's Bank IVC

Proposed Development of an In-Vessel Composting (IVC) Facility

Pre-Application Consultation Report

Prepared for

Veolia ES (Shropshire) Ltd

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1.0 INTRODUCTION

1.1.1 The purpose of this Pre-Application Consultation (PAC) report is to summarise the consultation exercise, the responses received, and the response of the Applicant to the comments made. The consultation period commenced on the 03/10/2025 and closed at the end of the 01/11/2025 providing more than the 28 days required under the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended).

1.1.2 The layout of this report and the information provided follows the requirements in paragraphs 6.4.36-6.4.39 of the Welsh Government's Development Management Manual (DMM) (revision 3 – May 2025).

2.0 NOTICES AND NOTIFICATION

2.1 Statutory consultation

2.1.1 A copy of the site notice erected around the site is provided at Appendix A of this statement. The same notice was also sent to the owners and occupiers of adjoining land, and relevant councillors and town/community councils for the locality (the so-called Community Consultees).

2.1.2 We declare that the site notices were displayed per the locations shown on the map provided as Appendix B.

2.1.3 Finally, a copy of the notices provided to Specialist Consultees is provided as Appendix C. Detail of those notified is provided in the following section.

3.0 COMMENTS FROM CONSULTEES & RESPONSE

3.1 Summary of comments from the public

3.1.1 The following table summarises the responses provided to the statutory publicity (i.e. the site notice and the letters with notice sent to owners/occupiers – with these sent to 57 addresses). Confirmation is also provided as to whether the issues raised have been addressed and if so, what has been done to address the point raised, or where they have not been addressed the reason why.

3.1.2 Appendix D provides details of all of these addresses notified of the development, with Appendix E providing copies of the responses received.

3.1.3 In total 6 responses received from the public, of these 3 were neutral and 3 were opposed.

3.1.4 It should be noted that in line with the advice in para. 6.4.38 of the Development Management Manual (DMM) Revision 3 May 2025 the private information of private individuals is not provided in the table and is redacted from the copies of comments received, as per the requirements of the Data Protection Act 1998.

Table 1 - Comments from the public – Summary and response

Summary of comments	Response
Amenity	
What will the impact be on local residents?	The Proposed Development would not result in a significant or adverse impact upon the amenity of nearby residents, with this demonstrated through the assessments provided at PAC stage and submitted with the Planning Application.
Noise and hours of operation	
Previous use caused noise pollution.	We note your comments, but as these relate to the previous use we cannot comment.
Will working be subject to normal hours?	A set of operating hours are proposed that will limit activity (e.g. deliveries, internal activities, external activities, use of the refining/screening plant) to standard working hours on Monday-Saturday, with only occasional deliveries between 07:00 to 13:00 on Sundays with these limited to offloading only (no processing).
Will there be weekend working?	Yes, there will be working on Saturdays, and occasional deliveries between 07:00 to 13:00 on Sundays with these limited to offloading only (no processing).
Will a noise wall be provided around the active part of the Site if there is unsocial hours activity?	Whilst there would be no activity that would result in disturbance during evening hours, an acoustic screen is proposed around the external refining plant to address noise generated from that plant.

Summary of comments	Response
What are the operating hours going to be?	A set of operating hours are proposed that will limit activity (e.g. deliveries, internal activities, external activities, use of the refining /screening plant) to standard working hours on Monday-Saturday, with only occasional deliveries between 07:00 to 13:00 on Sundays with these limited to offloading only (no processing).
Odour & health	
Object to smells arising from the nature of the activity planned. Concern about impact upon health (specifically unwell local residents) and impact upon the enjoyment of property	Per the Air Quality Assessment, Odour impacts are dependent on several factors; however a Dispersion Modelling Assessment (DMA) was undertaken using the most stringent assessment criterion, which concluded that there would be no offensive odour beyond the permitted installation boundary. In addition, there is the potential for odour emissions from waste reception and handling, and from the maturation pads which would utilise a forced aeration system to avoid the need to turn the piles. Waste reception and handling procedures would be developed as part of the Odour Management Plan (OMP) for the Facility, while the forced aeration used in the maturation process would ensure aerobic conditions are maintained thereby preventing the formation of highly odorous compounds. As such, no significant odour impacts are anticipated due to odour emissions from either the biofilter or any other sources. Thus, no change has been made to the Proposed Development in response to this comment.
Principle	
No objection in principle, feel is an acceptable use for the Site.	Thank-you for confirming your views on this point.
Strongly oppose Proposed Development. Do not wish to comment further at PAC stage.	As no specific matters are raised no response can be provided.
Transport	
What volume of traffic do you expect?	The Proposed Development is forecast to generate 73 two-way total vehicle trips per day (including 55 two-way HGV delivery trips and 18 two-way staff trips). When compared against the trip generating potential of the existing Site, the Proposed Development could result a net reduction of 248 two-way trips per day.
Concerns about the increased traffic along Fenns Bank of large vehicles delivering and collecting from the composting facility. Concerns about potential impacts upon property, road surfaces and safety of family and visitors	Per the Transport Statement, the Proposed Development is forecast to result in a net reduction in the number of vehicle trips compared to that which is both authorised by the extant planning permission for the Befesa Salt Slags development, and the operational permit under which it previously undertook work. Consequently, the Proposed Development would improve overall safety and operation of the local junction and no improvements are proposed to the access arrangements. As such, no change

Summary of comments	Response
	has been made to the Proposed Development in response to this comment.
PAC Process	
Difficulty accessing some documents on consultation webpage	Apology offered to respondent and direct link to download documents was provided. The consultation webpage was checked, and it was confirmed that all documents were available and could be downloaded.
From a local residents point of view access to see the documents in person in Overton is a little restrictive as many residents are unable to travel and don't have access to the internet	Whilst we note your views the approach to consultation meets the requirements set out in regulations and allows access to detail of the Proposed Development.
None planning matters	
Having a composting facility of the scale proposed close to their property could affect its value and the ability in the future to sell it.	Whilst your view is noted, impact upon property values is not a material planning consideration. As such, no change has been made in response to this comment.

3.2 Summary of responses from specialist consultees & community consultees

3.2.1 The following table summarises the responses provided from specialist consultees and the remaining Community Consultees (i.e. the relevant Community Council/s and County Councillor/s). A copy of each response is provided in Appendix F as per the requirements of the Development Management Procedure (Wales) Order 2012 (DMPWO) and para. 6.4.37 of the DMM.

3.2.2 An explanation of how each point raised has been addressed by the Applicant is also provided.

Table 2 - Comments from Specialist Consultees & Community Consultees – Summary and response

Summary of comments	Response
Hafren Dyfrdwy	
Clean Water Comments This type of enquiry is dealt with by Hafren Dyfrdwy as a Clean Water Development Enquiry. The application forms can be obtained from our website, or from the Developer Services team 0330 678 1481 Suggested Informative – affected water mains Before undertaking any work on site, all applicants must determine if Hafren Dyfrdwy has any assets in the vicinity of the proposed works which may be affected. This can be done by accessing our records at www.digdat.co.uk. Water mains have statutory protection and may not be built close to, or diverted without consent, consequently you must contact Hafren Dyfrdwy	Thank-you for your comments, the advice provided is noted and has been accounted for by the Applicant.

Summary of comments	Response
Asset Protection Team to discuss your proposals should a water main be affected. If you wish to apply for a clean water diversion, application forms can be obtained from our website or by contacting Developer Services on 0330 678 1481. Please see attached our Asset Protection information with precautions, conditions and requirements when working in close proximity of Severn Trent Water clean water assets. If our water mains cannot be accommodated to STW's Asset Protection satisfaction within the site, then please apply for a Diversion of our Asset.	
North Wales Fire & Rescue Service	
• The Fire Authority has no comment to make on access for fire appliances or water supplies. • The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation. The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links: https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/ https://www.ukfrs.com/index.php/promos/16847 Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales). Copy of guidance provided (see full response in appendices for detail).	Thank-you for your comments, and for confirming that you have no objection to the Proposed Development. The advice provided is noted and has been accounted for by the Applicant.
Dŵr Cymru Welsh Water (DCWW)	
We have reviewed the Planning, Design and Access Statement (PDAS) submitted in support of the pre application enquiry. The statement makes reference to a Drainage Strategy (Appendix L) however, the Appendix has not been made available to us. As such, without having sight of full details of the Drainage Strategy, we provide the following comments based on the information provided to us at this stage.	We note that you have advised that you were unable to access the Drainage Strategy. This was checked and a copy was available on the consultation website. A copy of the Drainage Strategy was shared. It is expected that this will not change your comments as the detail set out in the PDAS reflects that in the DS.

Summary of comments	Response
22/10/2025 - Update Thanks for getting in touch and sending through the Outline Drainage Strategy via WeTransfer. As you say, this has not changed our position as set out within our letter dated 16.10.2025 as the detail was set out in the PDAS.	22/10/2025 Thank-you for confirming your stance and that your position remains the same.
FOUL WATER DRAINAGE – SEWERAGE NETWORK We note from para 2.2.17 of the PDAS that 'foul water from the new in-building office facility would be transferred via underground pipework and flow control device to an on-site package treatment plant'. It appears the applicant does not propose to connect to the public sewer, we therefore have no further comments regarding sewerage. If the proposal intends utilising an alternative to mains drainage for foul water, we advise that the applicant seek advice from the Natural Resources Wales and/or the Building Regulations Authority as the regulatory body for this method of drainage. Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.	Thank-you for your comments, and for confirming that you have no objection to this aspect of the Proposed Development. The advice provided is noted and has been accounted for by the Applicant.
SURFACE WATER DRAINAGE We note from para 2.2.19 of the PDAS the proposal intends to dispose of clean surface water via attenuation ponds and attenuation tanks. As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy preferring infiltration (PL2) and, where infiltration is not possible, disposal to a surface water body (PL3), in liaison with the Lead Local Flood Authority and/or Natural Resources Wales, or surface water sewer or highway drain (PL4) in liaison with the riparian owner and/or Local Highways Authority.	Thank-you for your comments. The advice provided is noted and has been accounted for by the Applicant.
Sewerage Treatment	Thank-you for confirming this point. As no connection is proposed to the public sewerage network there would be no impact

Summary of comments	Response
No problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharges from this site.	upon capacity of the Wastewater Treatment Works.
POTABLE WATER SUPPLY The proposal does not fall within our operational area for water supply, and we would therefore suggest you consult with the relevant undertaker.	We can confirm that the relevant undertaker has been consulted.
TRADE EFFLUENT Para 2.2.20 of the PDAS states that "Process water (i.e. water that is contaminated due to having been either used to supress airborne PM / dust particles, or that which has been in contact on the external 'yard' areas / maturation pad, would be fed via a separate drainage system which would then feed to a water tank located adjacent to the biofilters. The water would be re-circulated into the dust suppression control or exported off-site via tankers for wastewater treatment". If the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system. A Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the process for applying for a Discharge Consent is independent of the planning process and an application for consent may be refused even though planning permission may have already been granted.	Thank-you for your comments. The advice provided is noted and has been accounted for by the Applicant.
Advisory notes cited.	Thank-you for your comments. The advice provided is noted and has been accounted for by the Applicant.
Wrexham County Borough Council Highway Authority	
Access The proposed development site is located on Fenns Bank Road which is a rural, classified road subject to a 60mph speed limit. Based on speeds of 60mph, any proposed / existing access would normally be required to provide visibility splays of 2.4 x 215m in both directions measured to the nearside edge of the adjoining highway in accordance with TAN 18. The applicant may wish to carry out a speed survey to determine 85th percentile speeds in order to obtain the required Stopping Sight Distances (SSD)/ Visibility Splays. Visibility from the existing access serving the development site is inadequate in both directions providing splays of approximately 2.4 x 80m in the north westerly direction and 2.4 x 70m in the south	Section 4.4 of the Transport Statement (TS) demonstrates that the Proposed Development would result in an overall net reduction in vehicle trips compared to the Site's extant permission. Nonetheless, Section 3.2 of the TS demonstrates that appropriate visibility splays can be achieved in accordance with observed 85th percentile speeds and relevant guidance contained in CD109 and CD123 of the Design Manual for Roads and Bridges (DMRB)

Summary of comments	Response
easterly direction measured to the nearside edge of the adjoining highway. Visibility is impeded in both directions by the existing hedgerow / vegetation. The Local Highway Authority (LHA) would not be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilising this substandard access.	
The LHA recommend that the applicant considers how visibility at the main access can be improved and provides appropriate plans indicating any such improvements.	See above.
The existing access serving the site is approximately 45m wide reducing to 8.2m wide at a distance of 14m behind the adjoining carriageway. The access is paved with hard bound materials and is gated approximately 14m behind the adjoining carriageway. The LHA would recommend that any gates are setback a suitable distance to accommodate the maximum length of vehicle that visits the site clear of the adjoining highway. Based on the largest vehicle (16.5m long HGV) likely to visit the site, the existing gates would benefit from being setback 20m behind the adjoining highway.	This is reflected on the latest proposed site plans, which are contained in Appendix C to the rear of the TS.
The submitted Transport Statement (ref: 5039- TS01 Dated Sep 2025) indicates that there is likely to be a reduction in the number of vehicular trips at the proposed site compared with what the existing site is currently capable of generating under its existing lawful use. The TS concludes that no improvements at the site access should be required.	Thank-you for summarising the Transport Statement conclusion on this point. It is assumed that this addresses your earlier point on vehicle movements and use of the access.
TRICs Data Existing Use The submitted data includes 9 sites. This sample includes 8 sites with edge of town locations and 1 of which is free standing. The first 8 sites are not considered to be comparable as the site is in a freestanding location. The selected free-standing site was surveyed more than 8 years ago and should not be included (approx. 12 yrs old). The LHA recommend that additional information is provided which includes comparable sites. It is not clear as to the total gross floor area for the existing / proposed buildings at the site or why the TRICs data is presented in hectares The LHA recommend that this detail is provided (in square metres).	New trip rates have been obtained based on these comments, as set out in Section 4.2 of the TS. The assessment of the existing use trip generation is also now based on the Site's existing GFA.
TRICs Data Proposed Use Estimated traffic generation for the proposed use has been calculated using a "first principles" approach based on information supplied by the applicant.	Section 4.3 provides further justification for why the methodology used to forecast the trip generation of the Proposed Development is appropriate. This relates to the fact that the information used to inform the 'first principles' trip generation forecasts has been informed

Summary of comments	Response
The submitted Transport Statement concludes that the proposed development is estimated to produce 55 HGV movements per day and 18 daily staff movements (9 proposed staff) equating to a total of 73 daily vehicle movements. However, the LHA recommend that the applicant provides traffic generation figures from a comparable site where similar operations occur or explains the methodology used to produce the estimated traffic figures. The LHA recommend that the above information is reviewed and re-submitted.	by detailed operational data supplied by the Applicant, who owns and operates a number of comparable in-vessel composting and waste treatment facilities elsewhere in the UK. The forecasts are therefore considered to provide an accurate reflection of how the Proposed Development would operate, compared to the use of other generic sites.
Parking & Turning Provision The Local Highway Authority (LHA) recommend that parking and turning provision at the site complies with LPGN 16 standards. The submitted car parking layout plan (Drg. no. VES_TD_WREXIVC_200-015) indicates the following:- No & Type 2 x Accessible Parking Bay 2 x EV Car Charging Bays 16 x Standard Car Parking Bay 6 x Covered Cycle Shelter	We note your comments and have addressed the specific points raised below.
The key indicates accessible parking bays of 2.4m width (needs amending to 3.6m wide).	This is reflected on the latest proposed site plans, which are contained in Appendix C to the rear of the TS, and provided separately as part of the application submission.
A more detailed plan of the proposed Sheffield cycle stands and shelter will be required (including annotated dimensions).	Details of the proposed cycle store are shown on the latest proposed site plans, which are contained in Appendix C to the rear of the TS, and provided separately as part of the application submission. Whilst these do not show the cycle store on a separate plan dimension are provided along with the number of stands. Further detail could be secured by a condition upon any planning permission.
It is not clear as to the total gross floor area of the existing / proposed buildings at the site or proposed Class Use (LPGN 16) in order to assess parking provision against LPGN 16 requirements. The LHA recommend this detail is provided.	Justification for the level of parking proposed in set out in Section 3.3 of the TS.
Details of the maximum number of vehicles likely to be on site at any one time (eg/ staff, visitors, contractors) requiring parking will need to be provided.	See above.
Adequate turning facilities must be provided within the curtilage of the site to accommodate the anticipated vehicle types / sizes visiting the site. The submitted Swept Path Analysis Plan (Drg. No.5039-ATR01) indicates the swept path movements of a	This is shown on Drawing Number 5039-ATR02 in Appendix D to the rear of the TS.

Summary of comments	Response
16.5m long HGV and 11.2m long refuse vehicle manoeuvring within the site which is considered acceptable. However, no details of these vehicles entering / exiting the site at the main access onto Fenns Bank Road appear to have been provided. The LHA recommend that this detail is provided.	
Active Travel The LHA recommend that the applicant liaises with our Strategic Transport Manager – Gwen Thomas on Tel: 01978 729667 (or email: gwen.thomas@wrexham.gov.uk) for advice in respect of any specific requirements for the proposed development that may be required under the Active Travel Act Guidance / LPGN 16. Any such requirements should be referenced / indicated on a revised layout.	Your advice is noted.
A more detailed plan indicating the proposed cycle parking / shelter provision at the site will need to be provided.	This point has been addressed above.
Refuse Collection / Recycling It is assumed that the proposed business will be serviced by a private contractor.	This is correct.
Construction Traffic Management Plan (CTMP) If an application for development is supported at the site, the LHA may recommend any permission includes the following condition:- No part of the development shall commence until a Construction Traffic Management Plan including provisions for contractor parking has been submitted to and approved in writing by the Local Planning Authority and the plan as is approved has been fully implemented.	We note your recommended condition and confirm that the Applicant will accept its inclusion upon any consent if this condition is considered to be required by the LPA.
Natural Resources Wales (NRW)	
We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding protected sites, foul drainage, contaminated land and pollution of controlled waters. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.	Thank-you for your comments. We have noted your concerns and additional information has been provided to address the points raised. Thus, we consider that they have been addressed.
Protected Sites **Nutrient Sensitive Special Area of Conservation** 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 (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. We therefore would	Per P8 of the (revised) Drainage Strategy: *"The existing site previously accommodated approximately 56 employees during its final 10–15 years of operation. The proposed development will employ 9 full-time staff, representing a substantial reduction in site occupancy. Consequently, the associated foul flow and phosphate load generated by the site will reduce compared to the existing situation. Therefore, the proposed*

Summary of comments	Response
advise the Planning Authority 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 foul sewage is to be disposed of via the existing drainage system (package treatment plant). As such, we refer you to our Advice and advise you provide further information with the full planning application. We note that information has already been submitted in respect of confirming domestic foul flows will discharge to the existing package treatment plant. However, we advise you to provide further information as identified in the section titled 'What does this mean for development proposals involving private sewage treatment systems' and 'Can additional wastewater be discharged to existing private sewage treatment systems?' of that Advice - i.e. provide detailed confirmation the existing system and drainage field remain fit for purpose and effective, with sufficient capacity for the proposed volume of wastewater discharge. These requirements are also outlined within page 8 of the Drainage Strategy (Water Co. October 2025), we understand the existing system is to be subject to a survey to ascertain the above. Please note: The discharge from the package treatment plant has a water discharge exemption currently registered with NRW under the name of the former business Befesa Salt Slags. Any existing or new discharge from the package treatment plant would need to be re-registered by the applicant, if an exemption is still applicable. A step by step guide to registering an exemption can be found on our website. If the septic tank or private sewage treatment system is not eligible for an exemption, you will need to apply for an environmental permit, further details can be found here. Should a permit be required further information may be needed as part of that application process. We therefore advise you to contact us for pre-application advice at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application advice service can be found here. It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. You are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.	*development will not have any adverse effects on the River Dee SAC.* *The existing sewage treatment plant, which previously served a population equivalent of 56 employees, will be decommissioned and replaced with a new Marsh Ensign treatment unit to ensure optimal treatment performance for the significantly reduced proposed population (approximately 9 staff). The proposed system can be fitted with an integrated biological phosphate reduction module capable of achieving final effluent concentrations of 0.2 mg/l. This will provide further phosphate reduction in addition to that achieved by reducing the number of staff.* *Treated foul flows from the treatment plant will be discharged to the existing 600mm drain in the northern extent of the site."*

Summary of comments	Response
Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer you to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information.	
Special Area of Conservation (SAC) / Ramsar The application site is within 185m of the following protected sites: • Midland Meres & Mosses Phase 2 (Wales) Ramsar - 185m • Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses (Wales) SAC - 185m We have concerns that harm from the proposed development on the SAC/Ramsar site cannot be ruled out. Aerial Emissions We have reviewed the documents listed below and provide the following advice. • Fichtner Consulting Engineers Limited, 23/09/2025, Shropshire In-Vessel Composting Facility, Veolia, Air Quality Assessment Addendum – Planning • Barry, K., 14/09/2025, Veolia Fenn's Bank IVC facility, Ecological interpretation of AQA, V 1.0 / Ref: K25-003 Page 27 of the AQA provides Table 19 - Airbourne Ammonia Impacts at Ecological Receptors. Page 32 - Appendix 1 of the 'Ecological Interpretation of the AQA' illustrates statutory sites plus the location of air quality modelling points. Our records illustrating the boundaries of the protected sites suggest that points E10, 12, 13 and 14 (from table 19) which are listed as 'local Nature sites', should be included within the statutory sites table. As per 5.1.2 of the AQA - 'The Air Emissions Guidance states that to screen out impacts as 'insignificant' at European and UK statutory designated sites: the long-term PC (process contributions) must be less than 1% of the long-term environmental standard (i.e., the Critical Level or Load)' The table on Page 27 shows E1 to be above critical level - which is carried through for further assessment. E10 is not despite being at 1.37%. The ecological interpretation document (Barry, K. 14/09/2025) concludes that 'the areas affected by an >1% increase in ammonia levels do not currently support SAC, Ramsar site or SSSI qualifying or notified features.' The conclusion recognises that some restoration work has been carried out but does not consider it to affect the return of site features. However, the information presented illustrates the predicted	An Air Quality Assessment Addendum (AQAA) is provided at Appendix O to the Planning Statement. An Air Quality Assessment (AQA) is provided as an appendix to the AQAA. In addition, an Ecological Interpretation of the AQA (EIAQA) is provided, also at Appendix O. The AQA was prepared to assess the potential impact on air quality, and concludes that there would be no significant effects on ecology due to both construction and operation. The AQA concludes that, in relation to the impact of ammonia emissions on ecological sensitive sites, the impact can be screened out as 'insignificant', except at the Fenns, Whixall, Bettisfield, Wem and Cadney Mosses SAC. However, the impact that cannot be screened out as insignificant does not occur at any location where the SAC qualifying habitats are present. The maximum impact where the qualifying habitat is present is predicted to be less than 1% of the Critical Level, and can be screened as insignificant. The EIAQA concludes that, following consultation with NRW, mitigation measures (increasing the stack height) have reduced the predicted process contribution to less than 1% within areas that have been bunded for rewetting and eventual bog restoration (currently supporting dense regrowth of birch and willow), and consequently process contributions at all qualifying features, or areas capable of restoration to support qualifying features can now be regarded as inconsequential (less than 1%).

Summary of comments	Response
airborne ammonia impacts within the boundaries of the protected sites as to be above critical level. If the process contribution plus the background level reaches or exceeds the critical level then abatement must be used to reduce the process contribution to below 1% of the critical level, in order for the application to proceed. Assuming there are no other sources of ammonia to consider. This is in line with our Guidance Note 020. The SAC features of active raised bogs and degraded raised bogs capable of natural regeneration are in proximity to the application site. The underpinning SSSI is already in exceedance of its Ammonia Critical Level for bryophyte- and lichen-rich bog. We therefore advise that any planning application submitted should present suitable mitigation measures to ensure the development proposal will not adversely affect the integrity of the SAC/Ramsar site. We also advise that other sources of ammonia should be considered and that an in-combination assessment is undertaken in line with the above noted guidance.	
Pollution Prevention Please see below land contamination and pollution of controlled waters sections for further details. As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), the Local Planning Authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC /Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. The Authority must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as is specified. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC/Ramsar site.	These matters are addressed within the Shadow Habitat Risk Assessment (Appendix P of the PDAS)
Site of Special Scientific Interest (SSSI) The application site is within 185m of Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SSSI. We consider the proposals have the potential to impact upon the Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded	Per the above these matters have been appropriately addressed.
Land Contamination Having reviewed the information submitted, we consider adequate investigations in relation to land contamination have been conducted. Under normal circumstances we would recommend the full suite of contaminated land conditions and improvements in	Thank-you for your comments, as you are satisfied no change has been made to the submission in response to the points raised.

Summary of comments	Response
line with Section 6.9 of Planning Policy Wales - Edition 12, however, this site and the adjacent landfill site have a complex site history with respect to polluting activities. We note that the applicant (and their consultants) refer to the adjacent landfill as being the primary source of soil, groundwater, and surface water contamination at and in the vicinity of the site however we do not agree with this conclusion. That being said, due to the complex nature of the site and the specific contamination, any potential cleanup (remediation) of contaminated land is thought to be impractical,	
Although the cleanup of contaminated land (soils / superficial deposits) is thought impractical, we do advise the removal and / or treatment of contaminated waters and the subsequent control of contaminated water leaving the site via the onsite drainage system and adjacent drainage ditches. The drainage system on site is complex and will need careful management to avoid on-site flooding and contaminated water from impacting the surrounding water courses. The Drainage Strategy will need to conform with SuDs and be submitted to the SuDs Advisory Board (SAB, Wrexham County Council). Please see Pollution of Controlled Waters section below for further comments. NRW Environmental Permit(s) will be required to ensure compliance with discharge and water quality standards and to protect the wider environment. NRW has a number of groundwater monitoring boreholes on the site, which will need to be protected and made available for any future groundwater monitoring that may be required. Details can be provided as required.	The Drainage Strategy provided at Appendix L of the PS confirms that the proposed Sustainable Drainage System will operate as a sealed system, and the attenuation pond will be constructed with an impermeable geotextile liner. This will prevent any ingress of groundwater into the system and will also ensure that contaminated groundwater is not mobilised or conveyed to the receiving watercourse.
Pollution of Controlled Waters **- Surface Water Drainage** As noted above, the existing site has a complex sealed drainage system, with several pumps which transferred surface water to different locations onsite whilst the previous business was operational (we understand the previous process utilised the surface water in the waste treatment). The water table is high in this area, and the yard was often subject to extensive flooding. This was also due to the presence of deep drains along the main access road (raised brick manhole chambers) which drain the triangular field to the East of the access road. The drainage strategy (Waterco October 2025) only shows the existing surface water drainage as serving the old office block and car park (Drawing No. A1_2416/01_Rev_00) MH 05 is the furthest point of the site drainage to the North of the development area by the access road, this was previously blocked to comply with environmental permit requirements. This will remain the case until the permit is surrendered subject to satisfactorily	The updated Drainage System (Version 04 - 5th January 2026) represents an updated version from that provided for consultation in October 2025. The surface water drainage scheme has been redesigned to ensure that it would avoid contamination of controlled waters. Further justification has been provided as to the size of the proposed attenuation ponds to accommodate flow of surface water.

Summary of comments	Response
remediation of the site. The unblocking of the site drainage, in view also of its connections to the deep drains from the neighbouring field, has the potential to create a pathway of shallow and deep contaminated groundwater to the Red Brook, it therefore needs to be carefully assessed and managed to avoid the contamination of controlled waters. Further to the above, the concept drainage sketches illustrate an attenuation pond which the proposed surface water drainage is connected to, it is not clear whether the size of the proposed attenuation pond would take into account the additional flow from the deep drains mentioned above. We understand the existing drainage strategy to be at concept stage with ground conditions to be considered at detailed design stage. We therefore advise that any future planning application provides sufficient evidence to demonstrate to no contaminated water would enter and cause detriment to surface water features. The management of on-site drainage to avoid flooding should also be considered in further detail.	
Protected Species We note that the information submitted in support of the above application (Preliminary Ecological Appraisal and Green Infrastructure Statement, Former Befesa Salt Slags Site, Fenn's Bank, Wrexham, Sambrook Associates ltd., 02 October 2025) has identified that protected species are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of protected species. We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.	Thank-you for confirming your stance on this point. As no concerns have been raised no changes are required to the submission.
Permits NRW Environmental Permits will be required to ensure compliance with discharge and water quality standards and to protect the wider environment. The current permit needs to be surrendered including the remediation of the surface water lagoon before the application of the composting permit can be considered. **Dewatering** Dewatering from excavations during construction may require an abstraction licence and a discharge permit Natural Resources Wales / Find out if you need a water abstraction or impoundment licence If dewatering to a watercourse, it may require the registration of an exemption Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK or as it is unlikely that it will meet the requirements in RPS 261, it may require a permit. If dewatering to land, The discharge itself may qualify for an exclusion from requiring an	Thank-you for your advice, all required permits will be sought. We are advised that the process to surrender the Site's extant permit is underway and will be concluded at the required point. As these points are none-planning matters no further detail is required as part of this report.

Summary of comments	Response
environmental permit: Groundwater activity exclusions from environmental permits - GOV.UK **Waste** Any excavation and removal of material offsite would need to consider the potential issues with land and GW contamination requirements and ensure compliance with waste duty of care and hazardous waste legislation.	
Other Matters Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information. 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. In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our website for further details. Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our website.	Thank-you for advice which has been noted by the Applicant.
Bronington Community Council	
We are closely studying the available documentation as well as taking soundings from our local residents, and it is already clear that there are a number of issues of concern regarding both the environmental and social impacts of the proposal as well as its compliance with national and regional planning strategies and guidance. We will not be commenting further at present, preferring to reserve our observations until your client's proposals reach the formal planning application stage.	Thank-you for your comments, we note the points raised but as no detail has been set out no detailed response can be provided. More generally, the Proposed Development will not result in material harm to the environment or the local community, and it complies with relevant planning policy and guidance.
Councillor Jeremy Newton	
No response received.	As no response was received no reply can be provided.

4.0 CONCLUSIONS

4.1.1 In conclusion, it is considered that the requirements for pre-application consultation have been met through the consultation exercise undertaken for this site.

4.1.2 It is also considered that the issues raised in consultation responses have been adequately addressed.

4.1.3 Therefore, there should be no barrier to registration of this application.

Appendix A - Notice erected around site, served on owners & occupiers of adjoining land, and on councillors, town and community councils

Proposed Development of an In-Vessel Composting (IVC) Facility at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA

SCHEDULE 1B: PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D - Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Notice is given that Veolia ES (Shropshire) Ltd is intending to apply for planning permission for Proposed Development of an In-Vessel Composting (IVC) Facility at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA.

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

The proposed site location is illustrated on the map below.



You may inspect copies of the proposed application, plans, and other supporting documents online at:

https://www.veolia.co.uk/proposed-waste-facility-pre-application-consultation

Computer facilities are available to view this information online at Overton Library, Cocoa Rooms, Pen-Y-Llan Street, Overton, Wrexham, LL13 0EE during the hours of:

Opening Times	
Monday	10:00-14:00
Tuesday	Closed
Wednesday	14:00-18:00
Thursday	Closed
Friday	14:00-18:00
Saturday	10:00-13:00

Anyone who wishes to make representations about this proposed development must write to the Agent by **01/11/2025**

jamiebradshaw@axis.co.uk

AXIS PED Ltd, Well House Barns, Bretton, Nr Chester, Flintshire, CH4 0DH

Signed: [redacted]

Date: 03/10/2025

Datblygiad Arfaethedig Cyfleuster Compostio Mewn-Llestr (CML) ar former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA

ATOLODEN 1B: CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO HYSBYSIAD O DAN ERTHYGLAU 2C A 2D – Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

Rhoddir rhybudd bod Veolia ES (Shropshire) Ltd yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer ganiatâd cynllunio amlinellol ar gyfer Datblygiad Arfaethedig Cyfleuster Compostio Mewn-Llestr (CML) ar former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA.

Mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r awdurdod cynllunio lleol ("ACLl"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLl perthnasol; ni fydd unrhyw sylwadau a ddarperir gennych wrth ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu I gyflwyno sylwadau i'r ACLl ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Dangosir lleoliad y safle arfaethedig ar y map isod.



Gallwch archwilio copïau o'r cais arfaethedig, cynlluniau, a dogfennau ategol eraill ar-lein yn:

https://www.veolia.co.uk/proposed-waste-facility-pre-application-consultation

Mae cyfleusterau cyfrifiadurol ar gael i weld yr wybodaeth hon ar-lein yn Llyfrgell Owrtyn, Co-coa Rooms, Stryd Pen-Y-Llan, Owrtyn, Wrecsam, LL13 0EE yn ystod oriau:

Oriau Agor	
Dydd Llun	10:00-14:00
Dydd Mawrth	Ar gau
Dydd Mercher	14:00-18:00
Dydd Iau	Ar gau
Dydd Gwener	14:00-18:00
Dydd Sadwrn	10:00-13:00

Mae'n rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglŷn â'r datblygiad arfaethedig hwn ysgrifennu at yr asiant erbyn **01/11/2025**

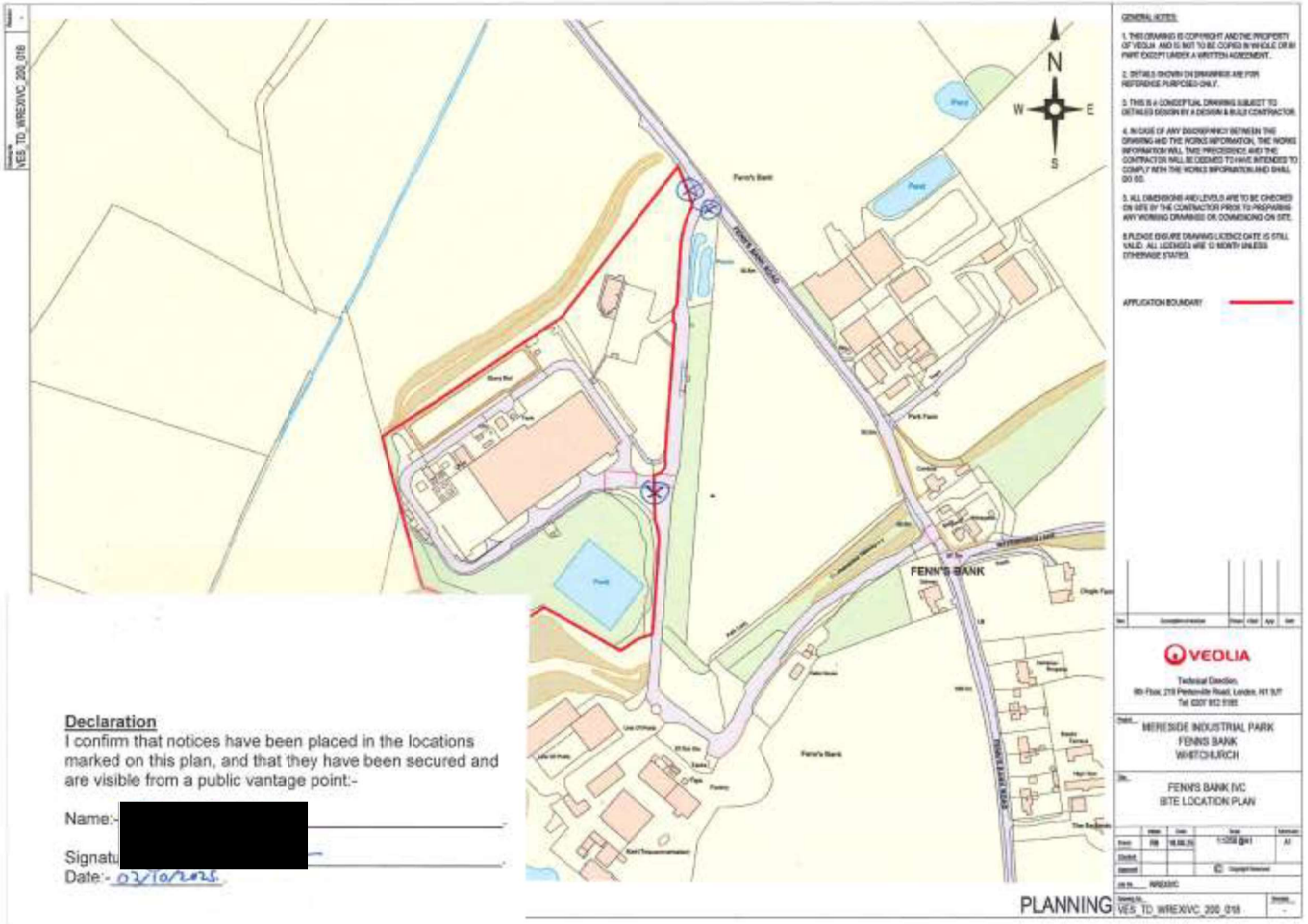
jamiebradshaw@axis.co.uk

AXIS PED Ltd, Well House Barns, Bretton, Nr Chester, Flintshire, CH4 0DH

Llofnod: [redacted]

Dyddiad: 03/10/2025

Appendix B - Declaration & locations of site notices



Declaration

I confirm that notices have been placed in the locations marked on this plan, and that they have been secured and are visible from a public vantage point:-

Name:- [redacted]

Signatu

Date:- 03/10/2025.

Appendix C - Notice served on specialist consultees

Proposed Development of an In-Vessel Composting (IVC) Facility at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA

SCHEDULE 1C: CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2D - Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Notice is given that Veolia ES (Shropshire) Ltd is intending to apply for planning permission for Proposed Development of an In-Vessel Composting (IVC) Facility at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA.

This notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

The proposed site location is illustrated on the map below.



You may inspect copies of the proposed application, plans, and other supporting documents online at:

https://www.veolia.co.uk/proposed-waste-facility-pre-application-consultation

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the Axis PED Ltd at

jamiebradshaw@axis.co.uk

by **01/11/2025**

Signed: [redacted]

Date: 03/10/2025

Datblygiad Arfaethedig Cyfleuster Compostio Mewn-Llestr (CML) ar former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA

ATOLODEN 1C: CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO HYSBYSIAD O DAN ERTHYGLAU 2D – Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

Rhoddir rhybudd bod Veolia ES (Shropshire) Ltd yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer ganiatâd cynllunio amlinellol ar gyfer Datblygiad Arfaethedig Cyfleuster Compostio Mewn-Llestr (CML) ar former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA.

Mae'r hysbysiad hwn yn ddeisyfiad ffurfiol am ymateb i ymgynghoriad cynymgeisio o dan erthygl 2D o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012.

Dangosir lleoliad y safle arfaethedig ar y map isod.

Gallwch archwilio copïau o'r cais arfaethedig, cynlluniau, a dogfennau ategol eraill ar-lein yn:

https://www.veolia.co.uk/proposed-waste-facility-pre-application-consultation

Yn unol â gofynion erthygl 2E o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012, rhaid anfon ymateb I Axis PED Ltd ar

jamiebradshaw@axis.co.uk

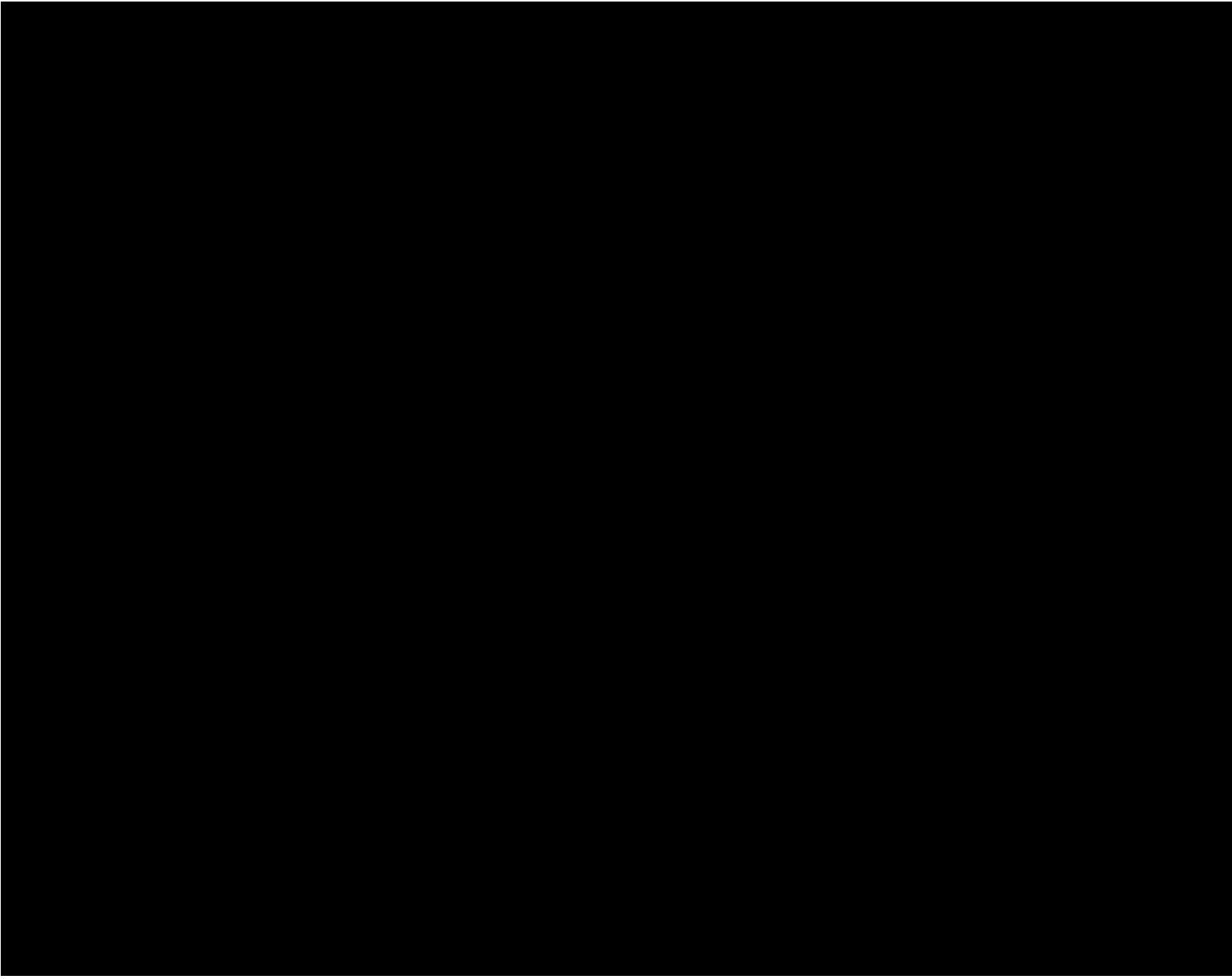
erbyn 01/11/2025

Llofnod: [redacted]

Dyddiad: 03/10/2025



Appendix D - List of local owner/occupiers addresses that were notified



Appendix E - Redacted responses from members of the public

Respondent A

[redacted]

From: [redacted]
Sent:
To:
Subject:

Categories: Filed to CloudFiler

You don't often get email from [redacted]

Submitted on Tue, 10/07/2025 - 05:16

Submitted by: Anonymous

Submitted values are:

Your Details

[redacted]

Your Message

Do you support the proposal
Neutral

Message
What are the operating hours going to be. What volume of traffic do you expect. What will the impact be on local residents .

[redacted]

[redacted]

Respondent B

[redacted]

From: [redacted]
Sent: 08 October 2025 13:50
To: [redacted]
Subject: Proposed Waste Facility Pre-Application Consultation re former BEFESA site at Fenns Bank, SY13 3PA

You don't often get email from [redacted]

We are one of the tennants at mereside ind park.

We have been forwarded by our landlord the consultation documents link. I am unable to open several of the files C, D, I, J3, J4, O1, O2 and the application form.

From a local residents point of view access to see the documents in person in Overton is a little restrictive as many residents are unable to travel and don't have access to the internet

regards
[redacted]

[redacted]

Respondent C

[redacted]

[redacted]

E mail [redacted]

Dear Sir,

Proposed development at Former Befesa, Fenns Bank SY13 3PA

(Ref: Jamie Bradshaw)

Thank you for notice of this proposed development on behalf of Veolia.I have no objection in principle, as I feel; that this is an acceptable use for the site.However, having for years endured noise pollution round the clock from reversing sirens and extractor fans from previous users, I am a little concerned at this aspect of the proposal. Will working be subject to normal hours? Will there be weekend working? Will a noise wall be provided around the active part of the site if there is unsocial hours activity? ?

I should be pleased to receive your response to my queries.

Yours faithfully,

[redacted]

[redacted]

Respondent D

Jamie Bradshaw

From: [redacted]
Sent:
To:
Subject: [Filed on 2025-10-30] Proposed Development of an IVC Fenns Bank

Categories: Filed to CloudFiler

You don't often get email from [redacted] Learn why this is important

In reply to your letter dated 3rd October 2025 we are strongly against this proposed development. Due to it being only a proposal we at this time are unwilling to make our objections public at this time.

Regards

[redacted]

Respondent E

Jamie Bradshaw

From: [redacted]
Sent: 30 October 2025 18:17
To: [redacted]
Subject: Veolia Pre-application Consultation - Fenns Bank

You don't often get email from [redacted]

Good Evening

I am a resident of Fenns Bank along with my family and we received your letter on the consultation on the above proposal.

Having looked at the documents provided, we have grave concerns over the proposal. Having spoken with our neighbours, they share similar concerns.

We intend to review any formal planning application you and Veolia submit and reserve our right to respond fully to that application if and when it is submitted.

Regards

[redacted]

[redacted]

Respondent F

Jamie Bradshaw

From: [redacted]
Sent: 31 October 2025 15:39
To: Jamie Bradshaw
Cc: Sally Stones
Subject: [Filed on 2025-10-31] Ref 5039-01/PAC/OOL

Categories: Filed to CloudFiler

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Sir/Madam,

I would like to register objections in relation to the proposed development at SY13 3PA outlined in the letter received by [redacted] on the 3rd of October.

The first objection is due to concerns we have about the increased traffic along Fenns Bank of large vehicles delivering and collecting from the composting facility. This is because of the potential impacts on our property, road surfaces and safety of our family and visitors.

The second objection is that of smells arising from the nature of the activity planned. My [redacted] is extremely unwell and we are concerned that the smells of the processing of waste will impact her health and impact the enjoyment of our property for her and the rest of the family.

The third objection is that having a composting facility on the scale that close to our property could affect its value and our ability in the future to sell the property.

Please acknowledge receipt of this email.

Regards,

[redacted]

Appendix F - Responses from specialist consultees & community consultees

Jamie Bradshaw

From: [redacted]
Sent: 07 October 2025 07:14
To: Jamie Bradshaw
Subject: Befesa Salt Slags Site, Fenns Bank, Near Whitchurch, Wrexham, SY13 3PA HD Ref P-251007-47618
Attachments: Schedule 1C - Spec. Consultees - 2025-10-03.pdf; Asset Protection Standard Guidance v140725.pdf

ST Classification: OFFICIAL PERSONAL

Good Morning

Thank you for your e mail

HD Asset Protection (including Planning team) wouldn't be able to offer any advice on a pre planning application; this is dealt with by Hafren Dyfrdwy as a Development Enquiry. The application forms can be obtained from our website, or from the Developer Services team 0800 707 6600. **If there are no sewers affected a developer enquiry would not be required for your proposals.**

The above site is out of Hafren Dyfrdwy's waste area, and therefore HD would have no drainage comment to make. The sewerage provider for this area is Welsh Water – **Website** developers.dwrcymru.com/en/applications/planning/drainage-and-water-searches **Phone** 0800 917 2652

Suggested Informative – affected water mains
Before undertaking any work on site, all applicants must determine if Hafren Dyfrdwy has any assets in the vicinity of the proposed works which may be affected. This can be done by accessing our records at www.digdat.co.uk
Public sewers and Water mains have statutory protection and may not be built close to, or diverted without consent, consequently you must contact Hafren Dyfrdwy to discuss your proposals should a water main be affected.
Hafren Dyfrdwy will seek to assist you obtaining a solution which protects both the public sewer and the proposed building. I have attached Asset Protection Standard Guidance for your information

Should you require any further information please contact us on email below.

Kind regards,
[redacted]
Asset Protection (West)
HD - Waste Water Services
[redacted]

[redacted]

[redacted]

Jamie Bradshaw

From: [redacted]
Sent: 08 October 2025 15:59
To: [redacted]
Subject: FW: Befesa Salt Slags Site, Fenns Bank, Near Whitchurch, Wrexham, SY13 3PA HD Clean Water Red J-251008-26889
Attachments: Asset Protection Standard Guidance v140725.pdf

Categories: PAC - Logged

ST Classification: OFFICIAL PERSONAL

Good Afternoon, Jamie

Thank you for your e mail

Apologies for the confusion I will provide clean water comments below as this is within our clean water area but not in our waste area

Clean Water Comments
This type of enquiry is dealt with by Hafren Dyfrdwy as a Clean Water Development Enquiry. The application forms can be obtained from our website, or from the Developer Services team 0330 678 1481

Suggested Informative – affected water mains
Before undertaking any work on site, all applicants must determine if Hafren Dyfrdwy has any assets in the vicinity of the proposed works which may be affected. This can be done by accessing our records at www.digdat.co.uk.
Water mains have statutory protection and may not be built close to, or diverted without consent, consequently you must contact Hafren Dyfrdwy Asset Protection Team to discuss your proposals should a water main be affected. If you wish to apply for a clean water diversion, application forms can be obtained from our website or by contacting Developer Services on 0330 678 1481.
Please see attached our Asset Protection information with precautions, conditions and requirements when working in close proximity of Severn Trent Water clean water assets. If our water mains cannot be accommodated to STW's Asset Protection satisfaction within the site, then please apply for a Diversion of our Asset .

Should you require any further information please contact us on email below.

Kind Regards

[redacted]
Asset Protection
Asset Strategy & Planning
Chief Engineer, Hafren Dyfrdwy
[redacted]

[redacted]

From: [redacted]
Sent: 07 October 2025 09:37
To: [redacted]
Subject: RE: Befesa Salt Slags Site, Fenns Bank, Near Whitchurch, Wrexham, SY13 3PA HD Ref P-251007-47618

You don't often get email from jamiebradshaw@axis.co.uk. Learn why this is important

Caution: This is an external email originating outside Severn Trent. Think before you click on links or open attachments.

Dear Caroline,
Thank-you for your response. To confirm do you have any comments to make as the water undertaker or is the Site also in DCWW coverage area? In this case we are consulting you as the Proposed Development is classed as a major development and you are classed as a Specialist Consultee under The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended,

Regards

Jamie Bradshaw
Senior Planning Consultant
[redacted]
www.axis.co.uk

25 YEARS IN 2025

[redacted]

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

Reference:
Proposal : Proposed Development of an In-Vessel Compost-ing (IVC) Facility at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA
Location: at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA

I acknowledge receipt of the notification to the North Wales Fire and Rescue Authority in relation to the above application.

As a specialist consultee the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development; -

- The Fire Authority has no comment to make on access for fire appliances or water supplies.
- The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links:

https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/

https://www.ukfrs.com/index.php/promos/16847

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully

[redacted]

[redacted]

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access

Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

Access required for emergency vehicles as Approved Document B Volume 2;-

Part B5 - Access and facilities for the Fire and Rescue Service provides the following requirements detailed under section 17 –

Table 20 Typical fire and rescue service vehicle access route specification

Appliance type	Minimum width of road between kerbs (m)	Minimum width of gateways (m)	Minimum turning circle between kerbs (m)	Minimum turning circle between walls (m)	Minimum clearance height (m)	Minimum carrying capacity (tonnes)
Pump	3.7	3.1	16.8	19.2	3.7	12.5
High reach	3.7	3.1	26.0	29.0	4.0	17.0

Table 19 Fire and rescue service vehicle access to buildings (excluding blocks of flats) not fitted with fire mains

Total floor area (1) of building m2	Height of floor of top storey above ground (2)	Provide vehicle access (3)(4) to:	Type of appliance
Up to 2000	Up to 11 Over 11	See paragraph 17.2 15% of perimeter (5)	Pump High reach
2000-8000	Up to 11 Over 11	15% of perimeter (5) 50% of perimeter (5)	Pump High reach
8000-16,000	Up to 11 Over 11	50% of perimeter (5) 50% of perimeter (5)	Pump High reach
16,000-24,000	Up to 11 Over 11	75% of perimeter (5) 75% of perimeter (5)	Pump High reach
Over 24,000	Up to 11 Over 11	100% of perimeter (5) 100% of perimeter (5)	Pump High reach

Dŵr Cymru Welsh Water

Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Tel: +44 (0)800 917 2652
Fax: +44 (0)2920 740472
E.mail: developer.services@dwrcymru.com

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E.bost: developer.services@dwrcymru.com

Jamie Bradshaw
Axis
Well House Barns
Bretton
Chester
CH4 0DH

Date: 16/10/2025
Our Ref: PPA0009680

Dear Sir/Madam

Grid Ref: 350637 339119
Site Address: former Befesa Salt Slags Site, Fenns Bank, Wrexham
Development: 2D- Proposed Development of an In-Vessel Compost-ing (IVC) Facility

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

Appraisal

Firstly, we note that the proposal relates to development for a IVC Facility at the Former Befesa Salt Slags Site.

We have reviewed the Planning, Design and Access Statement (PDAS) submitted in support of the pre application enquiry. The statement makes reference to a Drainage Strategy (Appendix L) however, the Appendix has not been made available to us. As such, without having sight of full details of the Drainage Strategy, we provide the following comments based on the information provided to us at this stage.

FOUL WATER DRAINAGE – SEWERAGE NETWORK

We note from para 2.2.17 of the PDAS that 'foul water from the new in-building office facility would be transferred via underground pipework and flow control device to an on-site package treatment plant'.

It appears the applicant does not propose to connect to the public sewer, we therefore have no further comments regarding sewerage.

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We welcome correspondence in Welsh and English.

Dŵr Cymru Cyf, a limited company registered in Wales no 2366777. Registered office: Pentwyn Road, Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y Gymraeg neu yn Saesneg.

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn Nelson, Treharris, Morgannwg Ganol CF46 6LY

If the proposal intends utilising an alternative to mains drainage for foul water, we advise that the applicant seek advice from the Natural Resources Wales and/or the Building Regulations Authority as the regulatory body for this method of drainage.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

SURFACE WATER DRAINAGE

We note from para 2.2.19 of the PDAS the proposal intends to dispose of clean surface water via attenuation ponds and attenuation tanks.

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy preferring infiltration (PL2) and, where infiltration is not possible, disposal to a surface water body (PL3), in liaison with the Lead Local Flood Authority and/or Natural Resources Wales, or surface water sewer or highway drain (PL4) in liaison with the riparian owner and/or Local Highways Authority.

Sewerage Treatment

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

POTABLE WATER SUPPLY

The proposal does not fall within our operational area for water supply, and we would therefore suggest you consult with the relevant undertaker.

TRADE EFFLUENT

Para 2.2.20 of the PDAS states that "Process water (i.e. water that is contaminated due to having been either used to supress airborne PM / dust particles, or that which has been in contact on the external 'yard' areas / maturation pad, would be fed via a separate drainage system which would then feed to a water tank located adjacent to the biofilters. The water would be re-circulated into the dust suppression control or exported off-site via tankers for wastewater treatment".

If the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system. A Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the process for applying for a Discharge

Consent is independent of the planning process and an application for consent may be refused even though planning permission may have already been granted.

Advisory Notes

In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption. We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements.

Please note, DCWW is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation. Please refer to further detailed advice relating to surface water management included in our attached Advice & Guidance note and our Developer Services website at https://developers.dwrcymru.com/en/help-advice/regulation-to-be-aware-of/sustainable-drainage-systems.

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e., a drain which extends beyond the connecting property boundary) or via a new sewer (i.e., serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at **developer.services@dwrcymru.com**

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We welcome correspondence in Welsh and English

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Please quote our reference number in all communications and correspondence.

Yours faithfully,

[redacted]
Planning Liaison Manager
Developer Services

***Please Note** that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.*

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[redacted]

Cyngor Bwrdeistref Sirol Wrecsam/ Wrexham County Borough Council
[redacted]

wrexham
COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL
wrecsam

AXIS
Email: [redacted]

Eich Cyf/Your Ref
Ein Cyf/Our ref PRE/2025/0116
Dyddiad/Date 3rd November 2025
Gofynner am/Ask for [redacted]
Rhif Cyswllt/Contact No
E-bost/E-mail

FAO: Jamie Bradshaw

Former Befesa Slags Site, Fenns Bank, Wrexham
Proposed Development of an In-Vessel Composting (IVC) Facility

Town & Country Planning (Development Management Procedure – Wales) Order 2012

I refer to your email / enquiry dated 03/10/2025 in respect of the above.

General

The existing site comprises the former BEFESA Salt Slag facility, a hazardous waste management facility. The proposed development comprises utilizing the existing building with some additional bio filter units to the north of the building to form a composting facility that will process green / food waste. Waste would be delivered in refuse collection vehicles or articulated lorries from the local area.

It is understood that the main access to the site off Fenns Bank Road is also shared with a limited number of industrial units at Mereside Industrial Park located to the south of the BEFESA facility.

Access

The proposed development site is located on Fenns Bank Road which is a rural, classified road subject to a 60mph speed limit.

Based on speeds of 60mph, any proposed / existing access would normally be required to provide visibility splays of 2.4 x 215m in both directions measured to the nearside edge of the adjoining highway in accordance with TAN 18.

The applicant may wish to carry out a speed survey to determine 85th percentile speeds in order to obtain the required Stopping Sight Distances (SSD)/ Visibility Splays.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.
We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

BUDDSODDWYR MEWN POBL | INVESTORS IN PEOPLE

[redacted]

Visibility from the existing access serving the development site is inadequate in both directions providing splays of approximately 2.4 x 80m in the north westerly direction and 2.4 x 70m in the south easterly direction measured to the nearside edge of the adjoining highway. Visibility is impeded in both directions by the existing hedgerow / vegetation.

The Local Highway Authority (LHA) would not be able to support any proposed development that is likely to result in any significant increase in vehicle movements utilising this substandard access.

The LHA recommend that the applicant considers how visibility at the main access can be improved and provides appropriate plans indicating any such improvements.

The existing access serving the site is approximately 45m wide reducing to 8.2m wide at a distance of 14m behind the adjoining carriageway. The access is paved with hard bound materials and is gated approximately 14m behind the adjoining carriageway.

The LHA would recommend that any gates are setback a suitable distance to accommodate the maximum length of vehicle that visits the site clear of the adjoining highway. **Based on the largest vehicle (16.5m long HGV) likely to visit the site, the existing gates would benefit from being setback 20m behind the adjoining highway.**

The submitted Transport Statement (ref: 5039- TS01 Dated Sep 2025) indicates that there is likely to be a reduction in the number of vehicular trips at the proposed site compared with what the existing site is currently capable of generating under its existing lawful use. The TS concludes that no improvements at the site access should be required.

TRICs Data

Existing Use

The submitted data includes 9 sites. This sample includes 8 sites with edge of town locations and 1 of which is free standing. The first 8 sites are not considered to be comparable as the site is in a freestanding location. The selected free standing site was surveyed more than 8 years ago and should not be included (approx. 12 yrs old). **The LHA recommend that additional information is provided which includes comparable sites.**

It is not clear as to the total gross floor area for the existing / proposed buildings at the site or why the TRICs data is presented in hectares The LHA recommend that this detail is provided (in square metres).

Proposed Use

Estimated traffic generation for the proposed use has been calculated using a "first principles" approach based on information supplied by the applicant.

The submitted Transport Statement concludes that the proposed development is estimated to produce 55 HGV movements per day and 18 daily staff movements (9 proposed staff) equating to a total of 73 daily vehicle movements.

However, the LHA recommend that the applicant provides traffic generation figures from a comparable site where similar operations occur or explains the methodology used to produce the estimated traffic figures.

The LHA recommend that the above information is reviewed and re-submitted.

Parking & Turning Provision

The Local Highway Authority (LHA) recommend that parking and turning provision at the site complies with LPGN 16 standards.

The submitted car parking layout plan (Drg. no. VES_TD_WREXIVC_200-015) indicates the following:-

No	Type
2	Accessible Parking Bay
2	EV Car Charging Bays
16	Standard Car Parking Bay
6	Covered Cycle Shelter

The key indicates accessible parking bays of 2.4m width (needs amending to 3.6m wide).

A more detailed plan of the proposed Sheffield cycle stands and shelter will be required (including annotated dimensions).

It is not clear as to the total gross floor area of the existing / proposed buildings at the site or proposed Class Use (LPGN 16) in order to assess parking provision against LPGN 16 requirements. The LHA recommend this detail is provided.

Details of the maximum number of vehicles likely to be on site at any one time (eg/ staff, visitors, contractors) requiring parking will need to be provided.

Adequate turning facilities must be provided within the curtilage of the site to accommodate the anticipated vehicle types / sizes visiting the site. The submitted Swept Path Analysis Plan (Drg. No.5039-ATR01) indicates the swept path movements of a 16.5m long HGV and 11.2m long refuse vehicle manoeuvring within the site which is considered acceptable. However, no details of these vehicles entering / exiting the site at the main access onto Fenns Bank Road appear to have been provided. **The LHA recommend that this detail is provided.**

Active Travel

The LHA recommend that the applicant liaises with our Strategic Transport Manager – Gwen Thomas on Tel: 01978 729667 (or email: gwen.thomas@wrexham.gov.uk) for advice in respect of any specific requirements for the proposed development that may be required under the Active Travel Act Guidance / LPGN 16. Any such requirements should be referenced / indicated on a revised layout.

A more detailed plan indicating the proposed cycle parking / shelter provision at the site will need to be provided.

Refuse Collection / Recycling

It is assumed that the proposed business will be serviced by a private contractor.

Construction Traffic Management Plan (CTMP)

If an application for development is supported at the site, the LHA may recommend any permission includes the following condition:-

No part of the development shall commence until a Construction Traffic Management Plan including provisions for contractor parking has been submitted to and approved in writing by the Local Planning Authority and the plan as is approved has been fully implemented.

Yours faithfully,

[redacted]
Contracts and Engineering Manager

On behalf of Chief Officer, Environment & Technical

[redacted]

Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-289730-K2Y6
Eich cyf/Your ref: Fenns Bank

Axis
Well House Barns
Bretton
Chester, CH4 0DH

Dyddiad/Date: 14 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED

BWRIAD/PROPOSAL: Proposed Development of an In-Vessel Composting (IVC) Facility at the former Befesa Salt Slags Site

LLEOLIAD/LOCATION: Fenns Bank, Near Whitchurch, Wrexham, SY13 3PA

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 06 October 2025.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding protected sites, foul drainage, contaminated land and pollution of controlled waters. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

Protected Sites

Nutrient Sensitive Special Area of Conservation

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* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. We therefore would advise the Planning Authority 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 foul sewage is to be disposed of via the existing drainage system (package treatment plant). As such, we refer you to our Advice and advise

you provide further information with the full planning application. We note that information has already been submitted in respect of confirming domestic foul flows will discharge to the existing package treatment plant. However, we advise you to provide further information as identified in the section titled 'What does this mean for development proposals involving private sewage treatment systems' and 'Can additional wastewater be discharged to existing private sewage treatment systems?' of that Advice - i.e. provide detailed confirmation the existing system and drainage field remain fit for purpose and effective, with sufficient capacity for the proposed volume of wastewater discharge.

These requirements are also outlined within page 8 of the Drainage Strategy (Water Co. October 2025), we understand the existing system is to be subject to a survey to ascertain the above.

Please note: The discharge from the package treatment plant has a water discharge exemption currently registered with NRW under the name of the former business Befesa Salt Slags. Any existing or new discharge from the package treatment plant would need to be re-registered by the applicant, if an exemption is still applicable.

A step by step guide to registering an exemption can be found on our website.

If the septic tank or private sewage treatment system is not eligible for an exemption, you will need to apply for an environmental permit, further details can be found here. Should a permit be required further information may be needed as part of that application process. We therefore advise you to contact us for pre-application advice at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application advice service can be found here.

It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. You are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer you to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information.

Special Area of Conservation (SAC) / Ramsar

The application site is within 185m of the following protected sites:

- Midland Meres & Mosses Phase 2 (Wales) Ramsar - 185m
- Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses (Wales) SAC - 185m

We have concerns that harm from the proposed development on the SAC/Ramsar site cannot be ruled out.

Aerial Emissions
We have reviewed the documents listed below and provide the following advice.

- Fichtner Consulting Engineers Limited, 23/09/2025, Shropshire In-Vessel Composting Facility, Veolia, Air Quality Assessment Addendum – Planning
- Barry, K., 14/09/2025, Veolia Fenn's Bank IVC facility, Ecological interpretation of AQA, V 1.0 / Ref: K25-003

Page 27 of the AQA provides Table 19 - Airbourne Ammonia Impacts at Ecological Receptors. Page 32 - Appendix 1 of the 'Ecological Interpretation of the AQA' illustrates statutory sites plus the location of air quality modelling points.

Our records illustrating the boundaries of the protected sites suggest that points E10, 12, 13 and 14 (from table 19) which are listed as 'local Nature sites', should be included within the statutory sites table.

As per 5.1.2 of the AQA - 'The Air Emissions Guidance states that to screen out impacts as 'insignificant' at European and UK statutory designated sites: the long-term PC (process contributions) must be less than 1% of the long-term environmental standard (i.e., the Critical Level or Load)'

The table on Page 27 shows E1 to be above critical level - which is carried through for further assessment. E10 is not despite being at 1.37%.

The ecological interpretation document (Barry, K. 14/09/2025) concludes that

> 'the areas affected by an >1% increase in ammonia levels do not currently support SAC, Ramsar site or SSSI qualifying or notified features.'

The conclusion recognises that some restoration work has been carried out but does not consider it to affect the return of site features. However, the information presented illustrates the predicted airborne ammonia impacts within the boundaries of the protected sites as to be above critical level.

If the process contribution plus the background level reaches or exceeds the critical level then abatement must be used to reduce the process contribution to below 1% of the critical level, in order for the application to proceed. Assuming there are no other sources of ammonia to consider. This is in line with our Guidance Note 020.

The SAC features of active raised bogs and degraded raised bogs capable of natural regeneration are in proximity to the application site. The underpinning SSSI is already in exceedance of its Ammonia Critical Level for bryophyte- and lichen-rich bog.

We therefore advise that any planning application submitted should present suitable mitigation measures to ensure the development proposal will not adversely affect the integrity of the SAC/Ramsar site. We also advise that other sources of ammonia should be considered and that an in-combination assessment is undertaken in line with the above noted guidance.

Pollution Prevention
Please see below land contamination and pollution of controlled waters sections for further details.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), the Local Planning Authority must, before deciding to give consent for

a project which is likely to have a significant effect on a SAC /Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. The Authority must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as is specified. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC/Ramsar site.

Site of Special Scientific Interest (SSSI)
The application site is within 185m of Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SSSI.

We consider the proposals have the potential to impact upon the Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded

Land Contamination

Having reviewed the information submitted, we consider adequate investigations in relation to land contamination have been conducted. Under normal circumstances we would recommend the full suite of contaminated land conditions and improvements in line with Section 6.9 of Planning Policy Wales - Edition 12, however, this site and the adjacent landfill site have a complex site history with respect to polluting activities. We note that the applicant (and their consultants) refer to the adjacent landfill as being the primary source of soil, groundwater, and surface water contamination at and in the vicinity of the site however we do not agree with this conclusion. That being said, due to the complex nature of the site and the specific contamination, any potential cleanup (remediation) of contaminated land is thought to be impractical.

Although the cleanup of contaminated land (soils / superficial deposits) is thought impractical, we do advise the removal and / or treatment of contaminated waters and the subsequent control of contaminated water leaving the site via the onsite drainage system and adjacent drainage ditches. The drainage system on site is complex and will need careful management to avoid on-site flooding and contaminated water from impacting the surrounding water courses. The Drainage Strategy will need to conform with SuDs and be submitted to the SuDs Advisory Board (SAB, Wrexham County Council). Please see Pollution of Controlled Waters section below for further comments.

NRW Environmental Permit(s) will be required to ensure compliance with discharge and water quality standards and to protect the wider environment.

NRW has a number of groundwater monitoring boreholes on the site, which will need to be protected and made available for any future groundwater monitoring that may be required. Details can be provided as required.

Pollution of Controlled Waters

- Surface Water Drainage

As noted above, the existing site has a complex sealed drainage system, with several pumps which transferred surface water to different locations onsite whilst the previous business was

operational (we understand the previous process utilised the surface water in the waste treatment). The water table is high in this area, and the yard was often subject to extensive flooding. This was also due to the presence of deep drains along the main access road (raised brick manhole chambers) which drain the triangular field to the East of the access road.

The drainage strategy (Waterco October 2025) only shows the existing surface water drainage as serving the old office block and car park (Drawing No. A1_2416/01_Rev_00) MH 05 is the furthest point of the site drainage to the North of the development area by the access road, this was previously blocked to comply with environmental permit requirements. This will remain the case until the permit is surrendered subject to satisfactorily remediation of the site. The unblocking of the site drainage, in view also of its connections to the deep drains from the neighbouring field, has the potential to create a pathway of shallow and deep contaminated groundwater to the Red Brook, it therefore needs to be carefully assessed and managed to avoid the contamination of controlled waters.

Further to the above, the concept drainage sketches illustrate an attenuation pond which the proposed surface water drainage is connected to, it is not clear whether the size of the proposed attenuation pond would take into account the additional flow from the deep drains mentioned above.

We understand the existing drainage strategy to be at concept stage with ground conditions to be considered at detailed design stage. We therefore advise that any future planning application provides sufficient evidence to demonstrate to no contaminated water would enter and cause detriment to surface water features. The management of on-site drainage to avoid flooding should also be considered in further detail.

Protected Species

We note that the information submitted in support of the above application (Preliminary Ecological Appraisal and Green Infrastructure Statement, Former Befesa Salt Slags Site, Fenn's Bank, Wrexham, Sambrook Associates ltd., 02 October 2025) has identified that protected species are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of protected species.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

Permits

NRW Environmental Permits will be required to ensure compliance with discharge and water quality standards and to protect the wider environment. The current permit needs to be surrendered including the remediation of the surface water lagoon before the application of the composting permit can be considered.

Dewatering

Dewatering from excavations during construction may require an abstraction licence and a discharge permit Natural Resources Wales / Find out if you need a water abstraction or impoundment licence

If dewatering to a watercourse, it may require the registration of an exemption Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK or as it is unlikely that it will meet the requirements in RPS 261, it may require a permit.

If dewatering to land, The discharge itself may qualify for an exclusion from requiring an environmental permit: Groundwater activity exclusions from environmental permits - GOV.UK

Waste

Any excavation and removal of material offsite would need to consider the potential issues with land and GW contamination requirements and ensure compliance with waste duty of care and hazardous waste legislation.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

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.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our website for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our website.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

[redacted]
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

[redacted]

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.

[redacted]

BCC Bronington Community Council
serving the wards of Iscoyd, Bronington and Tybroughton

27th October 2025

Mr Jamie Bradshaw
Axis Ltd

Re: Pre-Application Consultation: Proposed Development of an In-Vessel Composting (IVC) Facility at the former Befesa Salt Slags Site, Fenns Bank, Wrexham, SY13 3PA

Dear Mr. Bradshaw,

Thank you for your recent notification regarding the proposed Veolia development at Fenns Bank, Wrexham SY13 3PA.

We are closely studying the available documentation as well as taking soundings from our local residents, and it is already clear that there are a number of issues of concern regarding both the environmental and social impacts of the proposal as well as its compliance with national and regional planning strategies and guidance.

We will not be commenting further at present, preferring to reserve our observations until your client's proposals reach the formal planning application stage.

Yours sincerely

On behalf of Bronington Community Council

Chair: Ben Martin Vice-Chair: Louise Lindsay Clerk: Ruth Shackleton
[redacted] website: www.bronington-cc.org
[redacted] address: [redacted]

[redacted]

Councillor Jeremy Newton

No response received