Ein cyf/Our ref: CAS-316387-Z3C0
Eich cyf/Your ref: P/2026/0326

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 04 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Rhyddhau amod 6 (cynllun rheoli traffig adeiladu), 7 (goruchwylio coedyddiaeth), 9 (adroddiad ymchwiliad safle) a 13 (tirlunio) caniatâd cynllunio P/2025/0430 / Discharge of conditions 6 (construction traffic management plan), 7 (arboricultural supervision), 9 (site investigation report) and 13 (landscaping) of planning permission P/2025/0430

Lleoliad/Location: Oak Road, Wrexham Industrial Estate.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) with additional information about the above, which we received on 13 August 2026.

We continue to have **concerns** with the application as submitted. We do not recommend your Authority discharges **condition 9** for the following reasons. We do not have any observations to make in regard to conditions 6, 7 and 13.

Condition 9

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

- Phase 1 Assessment, Proposed Industrial Unit, Oak Road, Prepared by SP Associates, Dated March 2024
- Remediation Statement, Proposed Industrial Development, Oak Road, Prepared by SP Associates, Dated 30th October 2025
- The Oaks, Wrexham, Supplementary Phase II Geo-Environmental Assessment Report, Prepared by Brownfield Solutions Ltd, Dated July 2026 (Revision C)
- The Oaks, Wrexham, Remediation Strategy, Prepared by Brownfield Solutions Ltd, Dated May 2026

As noted in our previous response (CAS-311625-T4K1, dated 7 July 2026), it remains our understanding that Condition 9 applies to the entirety of the red line boundary. The information submitted is therefore limited in scope and does not demonstrate compliance

with the requirements of Condition 9 across the whole site. Accordingly, we reiterate our previous comments.

The Preliminary Risk Assessment, Site Investigation, Controlled Waters Risk Assessment and Remediation Strategy should be updated to account for the whole site prior to discharge of conditions.

In addition, we have concerns that the phase 1 Preliminary Risk Assessment does not adequately discuss site history as a cordite manufacturer or the processes that historically occurred within this part of the site. Therefore, there is no evidence that any potential contaminants have been adequately identified and as such sampled for.

If there are gaps within the suite of analysis for sampling this would need to be addressed and assessed prior to discharge of conditions.

We note a Site Investigation was carried out by SP Associates dated September 2025. This is not included on the planning portal. We recommend that all relevant information for Condition 9 be included in the discharge of condition submissions for completeness.

Reporting concludes that the risk to controlled waters associated with the site is low based upon the presence of underlying superficial deposits of glacial till and a lack of shallow groundwater. It is unclear however whether the wells installed by both SP Associates and Brownfield Solutions were dipped at regular intervals over an annual period to confirm a lack of shallow groundwater. It appears that there is a variation in superficial deposits towards the southern end of the site where shallow groundwater is present and likely in hydraulic continuity with Redwither Brook. Further information is required to clarify the conceptual site model. If there is any evidence to suggest there is a shallow groundwater body associated with the site, the controlled waters risk assessment will need to be revisited prior to discharge of conditions.

Other matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

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

Yn gywir / Yours faithfully,

Sara Thomas

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

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.