Ein cyf/Our ref: CAS-277635-B6T3
Eich cyf/Your ref: P/2025/0161

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 09 April 2025

Dear Sharon Holman,

PROPOSAL: CONSTRUCTION OF 2 NO SILAGE CLAMPS AND ALL ASSOCIATED WORKS

LOCATION: CARREG Y FFRANC, BANGOR ROAD, OVERTON, WREXHAM, LL13 0HL

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the further information in support of the above, which we received on 27 March 2025.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding pollution of controlled waters (and protected sites). If this information is not provided, we would object to this planning application. Further details are provided below.

Pollution of controlled waters

We understand this proposal is to build a new store for silage. The structure must be located, designed and built by a suitably qualified engineer to meet the construction and capacity requirements for the clamp and silage effluent collection and storage set in The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAPR).

Further details on how the effluent is to be managed should be sought from the Applicant including:

- Clamp 1 is to be constructed by using one of the existing clamp walls. This would therefore be considered an extension to the existing clamp. Therefore a perimeter channel would need to surround the existing clamp as well to comply with the regulations. We advise that further details are provided in this regard.

For further information, please see - Natural Resources Wales / What to provide with your planning application for an agricultural development

The applicant should note that under CoAPR, it is a requirement to notify NRW of new or substantially altered slurry stores at least 14 days before construction begins. Further

information on what we require is available on our website at Natural Resources Wales / Silage and slurry storage.

Protected Sites

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our *Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation* (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. We refer you in particular to the section of our Advice titled '*What does this mean for agricultural developments?*'

Silage clamps and associated infrastructure contain high nutrient content effluent. To prevent the high nutrient content effluent from affecting the SAC, we advise that the applicant submits the information as noted within the section "Pollution of controlled waters" above.

Should you conclude that the proposed development is likely to have a significant effect on the SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our website. We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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 on the above, please do not hesitate to contact us.

Yours faithfully,

Gareth Thomas
Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales
E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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