

From: Emma Broad <Emma.Broad@wrexham.gov.uk>
Sent: 22 November 2022 12:13
To: Nick Atkinson <Nick.Atkinson@wrexham.gov.uk>
Subject: RE: P/2021/0077 - Cae Mor Farm

Comments as follows;

The application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation. Specifically it lies less than 1km from the main River Ceiriog SAC adjacent to the head waters of tributaries called Nant Gwryd and Nant Iorworth.

This section of the River Ceiriog is already failing its updated phosphates targets of $25\mu\text{l-1}$. As such, responsible bodies such as the LPA have a responsibility to ensure beyond reasonable doubt that an application will not further adversely impact the SAC and should seek to address the existing target failure.

Free ranging poultry manure contains 4-5times more phosphorus per kg than other livestock, and therefore is a considerable input into an already failing catchment. Although the applicant has submitted a manure management plan and other evidence which shows that manure will be exported off site, this represents only manure collected from within the housing and not that which is deposited naturally within the ranging area. There is no evidence to suggest that all phosphates will be removed off site and that none will enter the River Ceiriog via the small tributaries either side of the ranging area or via ground water. Some evidence would need to be supplied that monitors existing water movement across the site and its potential to export phosphate. This is dependent on soil type and topography (amongst other factors), and proof of no route to the watercourse would be extremely difficult to prove.

Any plans to remove manure from the site must be both possible for an external auditor to monitor and available in perpetuity or for the lifetime of the development. There is no evidence that that an offsite and out of catchment market for the manure will always exist. What are the contingencies if the current agreement fails and how if it is sold on by a 3rd party can the applicant be 100% sure that it will not end-up within the River Dee or other SAC River catchment?

Given the above my HRA will conclude that there is potential for additional phosphates to enter the SAC, and add to an existing failing situation.

Emma