RESPONSE TO DRAINAGE ISSUES.

Pontfadog School P/2025/0346

I refer to your email dated 25th June 2025 concerning the two outstanding issues for the above planning application.

We are currently progressing an updated drawing and information to respond to issues raised by Wrexham Highways and will provide this when finalised.

In relation to the drainage issue, we can provide the following.

Your email of 25th June 2025 confirmed the following:

To confirm, NRW ask us as LPA to let them know if we feel the development would increase foul sewage from the site, which in this case we have confirmed. This makes no reference to connections to the sewer network.

The issue is the increase in volume of foul water being discharged into the sewer network, (and ultimately the SAC) when comparing the former and proposed use. The previous use means that pupils would have already resided in the catchment, whereas the proposed use has the potential to attract visitors outside of the catchment and more frequently, for example, the school would have been operational during the week and not on weekends. The development is likely to increase the volume of foul waste being discharged from the site which has an impact in terms of phosphates entering the failing SAC. We cannot reasonably conclude that the development would not have an adverse impact upon the SAC, as it will increase foul discharges. Planning appeals have upheld this stance. You can obtain further advice on this matter from NRW. I attached their response in my last email.

We have not confirmed in our submission that there will be an increase in foul sewage from the site.

We hope you will reconsider your interpretation of existing and proposed use and your interpretation of policy.

Your position assumes that: pupils at the school already resided in the catchment; use of the building has the potential to attract more visitors outside the catchment more frequently; use of the school is not operational at weekend.

Based on this you have concluded that the development is likely to increase the volume of foul waste being discharged from the site which has an impact in terms of phosphates entering the failing SAC. Therefore you are saying that WCBC cannot reasonably conclude that the development would not have an adverse impact upon the SAC and that it will increase foul discharges.

We recognise the importance of the issue and the important role in ensuring no damage to the SAC, however, we consider you could be more flexible in your analysis of the previous and proposed use of the school.

It is not correct to assume that pupil occupancy is dependant upon residence in the catchment. Advice provided on Reception admission in Wrexham schools includes complete flexibility via parental choice on educational options (Wrexham maintained, independent and out of county school applications). It is not correct to assume all pupils will reside in the catchment. A school might operate on the site completely with children in the catchment or a significant proportion commuting in, dependant upon the quality of education and opportunity offered. Any school operating as a Welsh Medium School is likely to attract pupils from a wider area. As such there is no factual basis to this aspect of your conclusion on previous use.

Your conclusion includes the proviso that the future use has the potential to attract more visitors outside the catchment more frequently. Our business case for the use of the building is to offer a meeting space and event venue for our local community. We hope this use will facilitate sustainable economic development within our community but provide a facility for local meetings/events/social gatherings. We hope this use will become part of our community and thus comprise existing residents in the catchment, or relatives of residents who might wish to use our facilities ie instead of local relatives' properties. We recognise there is potential to attract passing visitors, but our core business could evolve for and within our local community catchment. As such, there is again no basis of fact for your interpretation of use.

Your final conclusion is that the building use as a school will not operate at weekends. Schools are increasingly operating an out of hours service including extended opening hours and diversified uses as a means of income generation. It is thus incorrect to conclude the use of a school means no weekend use of the facilities.

If you accept a wider understanding of previous school use (potentially with weekend use and a business case delivering a facility use by local residents) this could conclude uncertainty in either an increase or decrease in foul sewage leaving the site. We consider you are not able to factually determine the statement that our planning submission would result in an increase in foul sewage from the site. A more positive interpretation might reflect on uncertainty in previous and proposed use and conclude no increase in foul water discharge from the site.

As such we consider you are able to reasonably conclude that the development would not have an adverse impact upon the SAC.

We would look to a more positive interpretation of the circumstances at Pontfadog, a very small scale community project designed to benefit the local community, based on an existing site with uncertainty in the change in discharge from existing to proposed use.

Finally we refer you to the specific guidance from NRW that you have used in your interpretation and have copied the details below.

What development proposals are unlikely to increase nutrient levels within a river SAC?

Every development should be considered by Planning Authorities on a case-by-case basis.

The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts:

- any development that does not increase the volume and concentration of nutrients in wastewater
- any development that improves existing water quality discharges by reducing the nutrient concentration of wastewater without increasing volume or by decreasing the volume of wastewater produced without increasing the concentration of nutrients
- developments intended to provide services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the SAC river catchment.

We are concluding that our proposals sit within the first and third bullet point and as such you are able to conclude no increase nutrient levels within a river SAC.

A wider more positive interpretation is consistent with the role of a planning authority facilitating regeneration in heritage buildings and stimulating local employment in rural communities.

In this specific issue we recognise the wider issue for Wrexham on SAC and phosphorus, however, in the absence of the LDP policies with no adopted plan, alongside the out-of-date UDP. I refer you to the letter from Wrexham Council Planning to the Inspectors for the LDP (dated 7th January 2022) where you recognised the wider policies including Planning Policy Wales “This is consistent with Planning Policy Wales 11, where Paragraph 4.2.21 provides scope for viability to be taken into account at Planning application stage where circumstances have changed since an LDP was adopted, including where there are specific infrastructure or site costs”. The very significant costs of bringing forward this heritage regeneration project might be part of your wider planning considerations. The wider benefits are discussed within the submitted Planning Statement.

I refer you to the new policies within Planning Policy Wales 12 as now being key in Wrexham including the core role of place making, creating and sustaining communities. Growing our economy and fostering economic investment.

Thank you for your further consideration.