

Ein cyf/Our Ref: CAS-262774-Y7Q7
Eich cyf/Your Ref: P/2024/0052

Wrexham County Borough Council,
The Guildhall,
Wrexham,
LL11 1AY

Dyddiad/Date: 28 August 2024

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD/PROPOSAL: CODI ADEILAD AMAETHYDDOL I STORIO CYNNYRCH A PHEIRIANNAU AC YMESTYN CLADDFA SILWAIR PRESENNOL / ERECTION OF AGRICULTURAL BUILDING FOR STORAGE OF PRODUCE AND MACHINERY AND EXTENSION OF EXISTING SILAGE CLAMP

LLEOLIAD/LOCATION: PEN Y PARC FARM, BLACK PARK, CHIRK, WREXHAM, LL14 5AX

Thank you for consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the additional information for the above, which we received on 17/08/2024.

We 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 protected sites and foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites and Foul Drainage

Silage Clamp

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?'

We note that the proposal includes the extension of an existing silage clamp. Clarification has been provided to confirm the development is not to facilitate an increase in livestock.

Our concerns relating to management of silage effluent, how effluent will be prevented from entering the SAC and whether there is potential to increase the amount of phosphorus within the designated site, are detailed below.

The structure must be designed and built by a suitably qualified engineer to meet the standards set in the Water Resources (Control of Agricultural Pollution)(Wales) Regulations (CoAPR) 2021 and BS 5502 (Building and Structures for Agriculture Code of Practice for Design, Construction and Loading). If built to these standards the application as submitted is unlikely to increase the amount of phosphorus entering the catchment.

From the additional information provided we note the following:

Perimeter Drain: The images provided appear to confirm that the existing silage clamp has a perimeter drain system that satisfies the CoAPR requirements. On the understanding that the silage clamp extension is also to be serviced by a perimeter drain that satisfies CoAPR, we would raise no further concerns.

Silage Effluent Collection Tank: The existing 12.75 m³ effluent collection tank is not large enough to accommodate for the silage clamp extension (this is assuming it is a stand-alone collection store and not connected to a slurry storage system in anyway).

The CoAPR states the capacity of the effluent tank must not be less than—

(d) in the case of a silo with a capacity of less than 1,500 cubic metres, 20 litres for each cubic metre of silo capacity, and

(e) in the case of a silo with a capacity of 1,500 cubic metres or more, 30 cubic metres plus 6.7 litres for each cubic metre of silo capacity in excess of 1,500 cubic metres.

The submitted plans indicate that once works have been completed the silage clamp will be 36.57 x 7.62 x 4 m which gives a silo capacity volume of 1,114.6536 m³. A silo of this capacity would require an effluent collection tank of approximately 22.29 m³ (unless it is connected to a slurry storage system whereby please re-consult).

We advise the size of the silage effluent tank must be reviewed and corrected to ensure it satisfies CoAPR requirements.

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).

Storage shed

We understand this proposal is partially to construct an agricultural shed for the storage of produce and machinery. The structure is not to accommodate an increase in stock number on the farm.

We have no concerns to raise concerning the storage shed and advise that the applicant follows the [Code of Good Agricultural Practice guidance](#).

Protected Species

We note the Ecological Assessment submitted with the application (Harvey Hughes, June 2024, Ecological Assessment, Pen y Parc Farm LL14 5AX) identifies that there is no evidence of bats or other protected species at the proposed site. We therefore have no comments to make on the application as submitted and advise that you liaise with your Authority's ecologist regarding the recommended practices.

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.

Yn gywir / Yours faithfully

Pauline Gallagher Brown

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

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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.