

Ein cyf/Our ref: CAS-249956-N9V3
Eich cyf/Your ref: P/2024/0086

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 14 March 2024

Dear Sir/Madam,

PROPOSAL: REPLACEMENT OF TOILET BLOCK WITH NEW UTILITY BUILDING AND ASSOCIATED WORKS

LOCATION: CHAPEL FARM MEADOWS WREXHAM

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 February 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 – foul drainage. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected sites

Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that a new toilet block to accommodate additional caravans on site has the potential to increase the amount of phosphorus being discharged from the site. As such, we refer you to our Planning Advice and advise you to seek further information from the applicant. We note that information has already been submitted in respect of and loads calculations and soakway details. However, we advise you to seek further information as the suggested calculations submitted are based on potential use, of a ¼ of potential guests (as indicated) would use the toilet/shower/bath with a volume of 0.8m³ day for the caravans. The calculations on the drainage plan (Sumner

Consultancy,(Sept'21) Drawing number 719-21-15 Revision E) also encompass the farmhouse property of 1.2m³ would give a volume of 2m³/day.

The proposed plan shows a tank accommodating 21people which would produce a volume of 2.35m³/day (allowing for 16 people at 100 litres a day and 5 at 150 litres a day).

However, our calculations (in line with Flows and Loads guidance) would be based as below:

8 x 2 bedroom caravans (not serviced) with a max occupancy of 4 people per caravan	32P	100 litres per day per person = 3.2 m ³ /day
6 bedroom farmhouse	8P	1.2 m ³ /day
		Total = 4.4 m ³ /day

Given the above which indicates that an exemption would not be appropriate for the site, and a permit is likely required, we strongly recommend pre-application discussions with our permitting team [pre-application advice service prior to applying for an Environmental Permit](#) to ascertain the correct calculations to be utilised in your application and confirmation if the farm house foul drainage will be encompassed within the calculations.

Provided this advice is followed and you are able to conclude that the development is not likely to have a significant effect on the SAC, we would have no objection to the proposal. However, 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).

Protected Species

We note that the Salopian Consultancy (19/01/2024) Preliminary Ecological Assessment submitted in support of the above application has identified that no GCN are not using the application site. We therefore have no further comments to make on protected species and advise that you liaise with your own Authority's ecologist

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

Ruth Prichard

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.