

Ein cyf/Our ref: CAS-213648-G0B2
Eich cyf/Your ref: P/2022/0820

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 August 2024

Dear Sir/Madam,

BWRIAD/PROPOSAL: Change of use to poultry processing facility. Seeking the condition of "No more than 2,000,000 birds shall be processed each week at the site subject to this permission"

LLEOLIAD/LOCATION: Maelor Foods, Pickhill Lane, Cross Lanes, Wrexham

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above.

We have no objection to the proposed variation of condition subject to the works outlined below being secured through planning application P/2022/0840.

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). 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.

Further to our previous comments (ref: CAS-199884-B1Y7) we have reviewed the additional information (*Appendix 9 Proposed Increased Discharge Impact Assessment ref: UC16765 and Appendix 20 – River Dee SAC Habitats Assessment – Phosphorous Neutral* (undated)) and provide the following comments:

The effluent treatment plant at Maelor currently comprises of the following stages, which are followed in sequence.

1. Primary Treatment

Rotary drum screen to screen wastewater.

2. Primary Treatment Dissolved Air Filtration (DAF)

Removal of suspended solids.

3. Secondary Treatment

Anoxic treatment tank followed by an aeration tank. Phosphorus is currently and will continue to be precipitated using ferric chloride. This technique is described as a BAT technique for the removal of phosphorus.

Currently waste is passed through a final clarifier tank and then a final filter before being discharged or reused in the factory for grey water applications. The Applicant proposes that these stages will be removed and that a membrane bioreactor plant (MBR) will be installed to provide tertiary treatment. The proposed MBR plant will provide further removal of phosphorus compared to the current configuration of the wastewater treatment works.

The plant currently processes just under 1 million birds per week. Monitoring data shows that the site discharge is currently comfortably below 1 mg/l for phosphorus. Records show that 1 mg/l has not been surpassed at any point this year.

Redirection of Treated Effluent from sites Package Treatment Plant

The site proposes that treated effluent from the current package treatment plant will be redirected to the effluent treatment plant to be treated a second time.

The current package treatment plant will remain in operation, therefore, effluent from the canteen and offices will continue to be treated prior to reaching the effluent treatment plant, reducing its overall loading on the main wastewater treatment plant and taking advantage of the further phosphate removal stages.

It is noted that despite increased loading from the increase to 2 million birds per week and treated effluent from the package treatment plant, a reduction in phosphate concentration in the final effluent will be observed. This is based on the content of the submitted reports in conjunction with the variation of condition application documents.

Management of Sludge

We note the submission of *Appendix 20 – River Dee SAC Habitats Assessment – Phosphorous Neutral* (undated) and states “for Phase 2 a sludge dewatering process will be installed which will significantly reduce the volume of sludge to be dealt with compared to Phase 1, even with double wastewater volume under Phase 2. We estimate this will reduce the number of sludge collections by around 80% and reduce the associated environmental emissions of vehicle movements and at the point of reuse offsite.” Therefore, as the proposal would result in a decrease in sludge production and an improvement on the existing scenario, we raise no further concerns.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

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.

Advice for Developers

- Environmental Permitting Regulations

We note a variation of a permit (ref: EPR/AB3591ZQ) was issued 16/07/2024 for the slaughtering of poultry and meat preparation as well as associated waste effluent treatment. The permitted throughput for the site is 2 million birds per week.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Siôn M. Williams

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.