

Ein cyf/Our ref: CAS-249579-J3S2
Eich cyf/Your ref: P/2024/0087

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 14 March 2024

Dear Sir/Madam,

PROPOSAL: VARIATION OF CONDITION 7 OF PLANNING PERMISSION P/2021/0640 TO INCREASE NUMBER OF CARAVANS FROM 5 TO 8.

LOCATION: CHAPEL FARM MEADOWS, WHITEWELL, WHITCHURCH, WREXHAM, SY13 3AL

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 19 February 2024.

We have concerns with the application as submitted. We do not recommend your Authority varies condition 7 for the following reasons.

Condition 7

We note that condition 7 for planning permission P/2021/0640 states the following:

"Notwithstanding drawing no.20_1124_003 Rev D there shall be no more than 5 no. 4 person holiday touring caravans on the land at any one time

Justification: To safeguard the integrity of the River Dee SAC in accordance with policy EC6 of the Wrexham Unitary Development Plan."

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 this is a section 73 application to discharges condition 7 from planning permission P/2021/0640. The applicant has not applied for a water discharge exemption under the Environmental Permitting (England and Wales) Regulations 2010.

The suggested calculations 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.

Ultimately it is a matter of judgment for you, as Competent Authority, to satisfy yourselves that the proposed development will not result in a significant effect on the SAC. Therefore, should your Authority conclude that the proposal is likely to have a significant effect on the River Dee and Bala Lake SAC, please consult us on your Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

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

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.