



Wrexham County Borough Council
Planning Department
Lambpit Street
Wrexham
LL11 1LAR

Our Ref: SG-1560-L3

20th April 2023

[BY EMAIL - gwyn.humphreys@wrexham.gov.uk]

FAO Gwyn Humphries

Dear Sir/Madam

**RE: PROPOSED CHRISTMAS TREE FARM AND OUTDOOR RECREATION CENTRE TO INCLUDE REINDEER CENTRE, PADDLE BOARDING, WATER RELATED ACTIVITIES, ENGINEERING OPERATIONS TO EXTEND THE EXISTING LAKE, CREATION OF BARK FOOTPATH, ERECTION OF CEDAR CLAD AGRICULTURAL BUILDING TO PROVIDE OFFICE, MACHINE AND EQUIPMENT STORE, HAY/STRAW STORAGE, SICK BAY/MATERNITY BAY SPACE FOR REINDEER, CREATION OF CAR PARK, CREATION OF ACCESS AND LANDSCAPING ON LAND TO THE SOUTH OF LLAY ROAD, CEFN-Y-BEDD, WREXHAM
PLANNING APPLICATION REF: P/2022/0681**

We refer to recent emails and discussions regarding the above planning application and, in particular the consultation response from NRW dated 10/01/23 and the subsequent meeting with NRW and your own ecologist.

We now attach the following additional information as requested at that meeting.
Attached are the following:

Goodwin Planning Services Ltd
Old Church Hall, Old Coach Road, Kelsall, Cheshire. CW6 0QJ
Tel: 01829 752851 Fax: 01829 752857 Email: s.goodwin@goodwinplanning.com

1. Additional ecological information/mitigation/safeguarding report prepared by Leigh Ecology.
2. Details of Package Treatment Plant proposed.
3. Amended site layout plan showing location of Treatment Plant, reed beds and willow pond (3034-01-022B).
4. Block plan showing Treatment Plant, reed beds and willow pond (3034-01-D03A).
5. Revised floor plans showing location of staff toilets (3034-01-003A).
6. Waste Carrier's Licence for company sourced to supply and remove mobile toilets used for events (Blue Loos) and receipt from Welsh Water accepting waste from the carrier at Five Fords Treatment Plant in Wrexham.

The staff toilets will be used by up to 4 staff. Discharge from these will be treated on site using a treatment plant, 2 reedbeds and a willow pool. Using the UK Government online calculator for sewage discharges, this would generate a daily sewage discharge of less than 1 cubic metre. Even for 6 people this would equate to a maximum discharge of 1.2 cubic metres per day. For the times when events are held the site will be supplied by mobile toilets provided by a licenced carrier and disposed of in accordance with appropriate regulations.

The documents and report demonstrate that the phosphate levels produced from the site will be significantly less than that created by the previous use (which could be resumed without requiring a further planning permission). In the light of the importance currently given to minimising phosphates in SAC catchment areas this is a further material consideration in favour of the granting of planning permission.

The NRW advice to LPAs for planning Applications Affecting Phosphorus Sensitive River SACs advises that certain developments can be screened out as unlikely to have a significant effect on a river SAC as they are unlikely to be a source of additional phosphorus or pathway for impacts. The application proposals fall squarely within 2 of these as set out below:

- any development that improves existing water quality discharges by reducing the phosphorus concentration of wastewater without increasing volume or by decreasing the volume of wastewater produced without increasing the concentration of phosphorus.
- private sewage treatment systems discharging domestic wastewater to ground, which are built to the relevant [British Standard \(BS 6297:2007+A1:2008\)](#), the maximum daily discharge rate is less than 2 cubic metres (m³) and the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and located more than 50m from a SAC boundary and at least 200m from any other known discharge to ground.

The proposal should therefore be treated as one which will not have a significant effect a river SAC in relation to phosphate levels (other than a beneficial impact over the past use of the site).

Could you please upload these documents to the Portal and forward to NRW for their consideration.

We hope this additional information satisfies NRW and your ecologist and enables the application to now proceed to an approval.

Yours faithfully

Stephen Goodwin
BA (Hons), MCD, MRTPI

Enc

