

Ein cyf/Our Ref: CAS-249050-L8B0
Eich cyf/Your Ref: P/2024/0052

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

Dyddiad/Date: 28 February 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 above, which we received on 12/02/2024.

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). 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 that the proposal includes the extension of an existing silage clamp. In the absence of detailed information relating to management of silage effluent, it is not clear how effluent will be prevented from entering the SAC and whether there is potential to increase the amount of phosphorus within the designated site.

We advise clarification on whether the proposed development is to facilitate an increase in livestock should be provided.

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.

We advise further details on the clamp are provided including:

- Silage Effluent: in line with Schedule 5 of the CoAPR 2021, a silage clamp must have adequate provision for the drainage of that effluent from those channels to an effluent tank, or appropriate slurry system, through a channel or pipe. Further details should be provided regarding the silage effluent drainage.
- Perimeter Drain: in line with Schedule 5 of the CoAPR 2021, a silage clamp must be provided at its perimeter with channels designed and constructed so as to collect any silage effluent that escapes from the silo. Further details should be provided regarding a perimeter drain.
- Substantial Enlargement/Reconstruction: as the existing silage clamp is undergoing a substantial enlargement/reconstruction the entire silage clamp, not just the extension, will have to meet the requirements set out in Schedule 5 of the CoAPR 2021. Further details regarding the compliance of the whole store, old and new section, should be provided.

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](#).

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.