

NEW SPECIALIST CARE FACILITY BUILDING
at
PENDINE PARK, GREENFIELD ROAD, WREXHAM
for
PENDINE PARK CARE ORGANISATION LTD

**RECORD OF ADDRESSES OF PATIENTS, STAFF, AND SERVICE PROVIDERS IN RELATION TO RIVER DEE AND BALA LAKE SAC FOR PURPOSES OF NRW
PHOSPHATES GUIDANCE CONSIDERATION**

The following register is of postcodes for all patients, staff and service providers residing or working at Pendine Park. Exact names and addresses have been omitted in order to protect patient and staff confidentiality, but if specifically needed by the Council or NRW they can be requested under a confidentiality agreement with Pendine Park.

Purpose of this register is to show the number of people present on site that also live in the River Dee & Bala Lake phosphorous catchment area as defined in the Wrexham Local Development Plan 2013-2028 document EBN04-Dee Catchment Phosphorous Reduction Strategy draft dated Nov 2021.

- 1.1.1 The Dee is the largest river in North Wales with a catchment area of more than 1,800 km². The River Dee has its source in Snowdonia at the outflow of Llyn Tegid and it includes the Ceiriog, Meloch, Tryweryn and Mynach tributaries. Its catchment contains a variety of landscapes from high mountains around Bala, rugged peaks near Llangollen, steep sided wooded valleys, and the plains of Cheshire, Flintshire, north Shropshire and Wrexham.

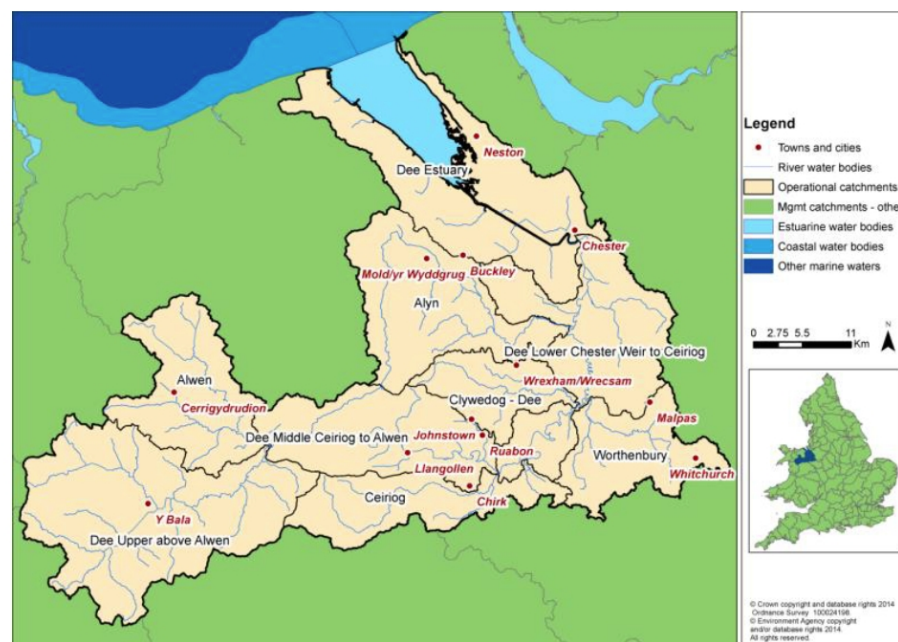


Figure 1.1 River Dee catchment (source [NRW Dee Management Catchment Summary](#))

The latest NRW guidance to planning version 3 dated July 2022 states :

For the purposes of the Conservation of Habitats and Species Regulations 2017 (referred to in this Advice as the Habitats Regulations), the Planning Authority is a competent authority responsible for undertaking the Habitats Regulations Assessment of implications of a plan or project on an SAC. As such, it is a matter for the Planning Authority to determine whether a plan or project is likely to have a significant effect on an SAC having considered this advice.

This places the powers on the Local Planning Authority to decide which applications they consider can be progressed through the planning system at this time.

It goes on to advise :

In SAC catchments failing to meet phosphorus targets, it is possible that new developments can be authorised if it can be demonstrated they will not lead to further deterioration of water quality in the SAC water bodies failing to meet water quality targets and will not undermine the ability for the SAC to meet its conservation objectives.

This may be achieved if:

- *developments are not a source of phosphorus or*
- *developments are a source of phosphorus but there is no pathway for it to enter the SAC river environment or*
- *measures associated with a given development are put in place so that nutrient neutrality can be achieved and that development does not lead to a net increase in phosphorus entering the SAC river environment.*

And:

The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to phosphorus inputs, as there is unlikely to be a source of additional phosphorus or pathway for impacts:

- *developments intended to provide services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the SAC river catchment*

We've highlighted the two relevant sections of the NRW's guidance that relate to the Special Care facility at Pendine Park.

Following discussions and a site meeting with Mr Matthew Phillips, Interim head of Service Planning Policy at Wrexham County Borough Council, it has been explained that the NRW recognise that a person who normally resides within the River Dee & Bala Lake catchment areas will not add any extra phosphates load to the drainage infrastructure if they also work or are being treated at locations within the catchment area.

Basically, by living & working within the same catchment area their phosphate impact on the catchment area will remain neutral because they cannot be in two places at the same time and therefore cannot be adding to the phosphate loading. This is the point being made in the NRW's report as a development that *"can be screened-out as not likely to have a significant effect on a river SAC in relation to phosphorous inputs"*.

This screening is relevant to the new development at Pendine Park because patients, residents, staff and service providers that will reside and operate the new building mostly are already residents within the catchment area, as per the following tables of information.

Pendine Park currently comprises of a number of separate but linked specialist care buildings providing the overall service on site – see map below.



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The existing properties are named :

- Bodlondeb
- Highfield
- Bryn Bella
- Pen y Bryn
- Cae Bryn

There is also the on-site laundry building

The proposed new specialist care building will be know as Pen Y Don

Postcodes checked again by McC on 18th April 2023 following responses by Local Authority.

Using an overlay of the NRW catchment area plan from the Wrexham LDP 2013-2028 document EBNB04 “the Dee catchment phosphorous reduction strategy” dated Nov 2021, and the NRW/EA document “Dee Management Catchment Summary” Figure 1 onto an OS Map, postcodes are highlighted as :-

WITHIN CATCHMENT AREA:

Wrexham

LL13 7TH

Wrexham

LL13 7PN

OUTSIDE CATCHMENT AREA:

Swansea

SA4 4UU

Rhyl

LL18 3DD

Aberystwyth

SY23 3AY

Ellesmere Port

CH65 2DD

The postcode addresses received from Pendine Park Care Organisation Ltd for each property are as follows:

BODLONDEB:

Staff Postcodes for Bodlondeb - Total per Postcode

Town	Postcode	Total
Wrexham	LL13 7TH	7
Wrexham	LL13 7PN	5
Wrexham	LL13 7TN	5
Wrexham	LL13 7PY	4
Wrexham	LL13 7TL	4
Wrexham	LL13 7UR	4
Wrexham	LL11 2LN	3
Wrexham	LL11 2LW	3
Wrexham	LL11 6SB	3
Wrexham	LL13 0JH	3
Wrexham	LL13 7RP	3
Wrexham	LL13 8NT	3
Wrexham	LL11 1AB	2
Wrexham	LL11 3DN	2
Wrexham	LL11 4UH	2
Wrexham	LL11 6RT	2
Wrexham	LL12 7DG	2
Wrexham	LL13 7EG	2
Wrexham	LL13 7NY	2
Wrexham	LL13 7RY	2
Wrexham	LL13 7SY	2

Resident Postcodes for Bodlondeb - Total per Postcode

County	Postcode	Total
Wrexham	LL13 7TD	15
Old Colwyn	LL29 8AT	4
Kinmel Bay	LL18 5UJ	2
Cheshire	CH66 2UZ	1
Flintshire	CH7 5LT	1
Rhyl	LL18 2YU	1
Denbigh	LL16 4NH	1
Whitchurch	SY13 3EA	1
Flintshire	CH7 1TE	1
Wrexham	LL11 6RS	1
Denbigh	LL16 5YN	1
Wrexham	LL14 2EY	1
Ruthin	LL15 2DF	1
Cheshire	CH64 2TN	1
Chester	CH4 0GG	1
Wrexham	LL12 8PF	1
Denbighshire	LL18 3SY	1
Bala	LL23 7AX	1
Rhyl	LL18 4DT	1
Powys	SY16 1PR	1
Wrexham	LL11 4UE	1

NUMBER WITHIN CATCHMENT AREA = 65 of 65

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Wrexham	LL13 7TG	2
Wrexham	LL13 7TP	2
Wrexham	LL14 4BN	2
Chester	CH3 6FB	1
Buckley	CH7 2NH	1
Holywell	CH8 8LL	1
Wrexham	LL11 2AX	1
Wrexham	LL11 2ER	1
Wrexham	LL11 2LP	1
Wrexham	LL11 2NT	1
Wrexham	LL11 2NX	1
Wrexham	LL11 2UE	1
Wrexham	LL11 3EF	1
Wrexham	LL11 3NU	1
Wrexham	LL11 4EA	1
Wrexham	LL11 4EF	1
Wrexham	LL11 4EY	1
Wrexham	LL11 4HX	1
Wrexham	LL11 4QE	1
Wrexham	LL11 4TE	1
Wrexham	LL11 6PR	1
Wrexham	LL11 6RL	1
Wrexham	LL11 6RS	1
Wrexham	LL11 6RY	1
Wrexham	LL12 0SF	1
Wrexham	LL12 8BP	1
Wrexham	LL12 9PD	1
Wrexham	LL13 0NT	1
Wrexham	LL13 7BB	1

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Birkenhead	CH42 9LQ	1
Wrexham	LL13 9YY	1
Abergele	LL22 8LJ	1
Newtown	SY16 3JA	1
Wrexham	LL13 7RW	1
Welshpool	SY21 7DJ	1
Abergele	LL22 7LY	1
Llangollen	LL20 8EN	1
Newtown	SY16 3EZ	1
Denbigh	LL16 3ES	1
Llangollen	LL20 8TE	1
Colwyn Bay	LL29 8AY	1
St Davids	SA62 6SQ	1
Chirk	LL14 5LN	1
Conwy	LL32 8PF	1
Wrexham	LL13 9PG	1
Llangollen	LL20 8TP	1
Rhyl	LL18 3DD	1
Aberystwyth	SY23 3AY	1
Ellesmere Port	CH65 2DD	1
Wrexham	LL13 9GX	1
Welshpool	SY21 7DU	1
Whitchurch	SY13 1NT	1
Ewloe	CH5 3JE	1
Llandfyllin	SY16 1EW	1
Swansea	SA4 4UU	1

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Wrexham	LL13 7BG	1
Wrexham	LL13 7DD	1
Wrexham	LL13 7HX	1
Wrexham	LL13 7NP	1
Wrexham	LL13 7PU	1
Wrexham	LL13 7QU	1
Wrexham	LL13 7SL	1
Wrexham	LL13 7SZ	1
Wrexham	LL13 7TS	1
Wrexham	LL13 7TU	1
Wrexham	LL13 7UE	1
Wrexham	LL13 8EA	1
Wrexham	LL13 8EY	1
Wrexham	LL13 8PG	1
Wrexham	LL13 8PT	1
Wrexham	LL13 8RB	1
Wrexham	LL13 8TL	1
Wrexham	LL13 8UY	1
Wrexham	LL13 9FX	1
Wrexham	LL13 9HP	1
Wrexham	LL13 9LE	1
Wrexham	LL13 8NT	1
Wrexham	LL14 2NL	1
Wrexham	LL14 3EN	1
Wrexham	LL14 3UB	1
Wrexham	LL14 4BY	1
Wrexham	LL14 4JF	1
Wrexham	LL14 6BW	1

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HIGHFIELD:

Staff Postcodes for Highfield - Total per Postcode

Town	Postcode	Total
Wrexham	LL11 1EL	4
Wrexham	LL13 7TP	3
Wrexham	LL11 2LW	2
Wrexham	LL11 4EF	2
Wrexham	LL11 4QN	2
Wrexham	LL11 6BG	2
Wrexham	LL13 7NA	2
Wrexham	LL13 7SZ	2
Wrexham	LL13 7TL	2
Wrexham	LL13 8TP	2
Wrexham	LL13 9HS	2
Wrexham	LL13 9HW	2
Wrexham	LL14 4DN	2
Wrexham	LL14 6EJ	2
Wrexham	CH4 0EZ	1
Penyffordd	CH4 0LB	1
Saltney	CH4 8QN	1
Buckley	CH7 2QJ	1
Treuddyn	CH7 4LY	1
Wrexham	LL11 2AE	1
Wrexham	LL11 2AX	1
Wrexham	LL11 2HQ	1
Wrexham	LL11 2JA	1
Wrexham	LL11 2LN	1

Resident Postcodes for Highfield - Total per Postcode

County	Postcode	Total
Wrexham	LL13 7TD	22
Trefnant	LL16 4UN	2
Holywell	CH8 7ST	2
Hope	LL12 9NH	2
Llanfaelog Anglesey	LL63 5SN	2
Flint	CH6 5JU	2
Chester	CH1 4JJ	1
Wrexham	LL13 9NY	1
Wrexham	LL13 8UV	1
Wrexham	LL11 4BA	1
Wrexham	LL14 3AU	1
Swadlincote	DE12 7AS	1
Wrexham	LL13 0EB	1
Wrexham	LL13 8QR	1
Flintshire	CH6 5AB	1
Wrexham	LL11 6AP	1
Wrexham	LL12 2UY	1
Bala	LL23 7DT	1
Deeside	CH5 4JP	1
Chirk	LL14 5LN	1
Wrexham	LL13 9DL	1
Wrexham	LL14 3DR	1
Wrexham	LL13 ONN	1
Flint	CH6 5FA	1

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Wrexham	LL11 2NU	1
Wrexham	LL11 2PD	1
Wrexham	LL11 2UE	1
Wrexham	LL11 2UG	1
Wrexham	LL11 2UU	1
Wrexham	LL11 3DN	1
Wrexham	LL11 3HP	1
Wrexham	LL11 3HW	1
Wrexham	LL11 4BU	1
Wrexham	LL11 4DT	1
Wrexham	LL11 4DY	1
Wrexham	LL11 4EU	1
Wrexham	LL11 4FG	1
Wrexham	LL11 4HS	1
Wrexham	LL11 4LE	1
Wrexham	LL11 4QA	1
Wrexham	LL11 4SQ	1
Wrexham	LL11 4SY	1
Wrexham	LL11 4TJ	1
Wrexham	LL11 4TN	1
Wrexham	LL11 4UJ	1
Wrexham	LL11 4UN	1
Wrexham	LL11 4UX	1
Wrexham	LL11 4XB	1
Wrexham	LL11 4XD	1
Wrexham	LL11 5AH	1
Wrexham	LL11 5AN	1
Wrexham	LL11 5BH	1
Wrexham	LL11 6AD	1

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Chester	CH4 0HU	1
Flintshire	CH7 3JE	1
Pentre Bwlch	LL11 3BG	1
Flint	CH6 5RF	1
Wrexham	LL12 0LG	1
Ruthin	LL15 1PS	1
Wrexham	LL11 6PE	1
Llangollen	LL20 7UR	1
Chester	CH2 1UL	1
Chester	CH4 9DB	1
Leighton Crewe	CW1 4QJ	1
Denbigh	LL16 5SU	1
Connahs Quay	CH5 4NB	1
Wrexham	L14 2B2	1
Chester	CH2 1QD	1
Flintshire	CH5 3JE	1
Deeside	CH5 1PU	1
Northwich	CW9 7QA	1
Wrexham	LL11 2BE	1
Wrexham	LL12 8PP	1
Mold	CH7 5DY	1
Buckley	CH7 2JR	1
Wrexham	LL12 7TP	1
Wrexham	LL14 6HF	1
Wrexham	LL13 0TS	1
Wrexham	LL11 2YG	1
Wrexham	LL14 2SY	1
Wrexham	LL11 6RD	1
Wrexham	LL13 8HB	1

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Wrexham	LL11 6AQ	1
Wrexham	LL11 6DG	1
Wrexham	LL11 6JD	1
Wrexham	LL11 6JG	1
Wrexham	LL11 6LW	1
Wrexham	LL11 6NJ	1
Wrexham	LL11 6RT	1
Wrexham	LL11 6SL	1
Wrexham	LL11 6SP	1
Wrexham	LL11 6YF	1
Wrexham	LL11 6YG	1
Wrexham	LL12 0PN	1
Wrexham	LL12 0TW	1
Wrexham	LL12 7BA	1
Wrexham	LL12 7BN	1
Wrexham	LL12 7PG	1
Wrexham	LL12 7UT	1
Wrexham	LL12 8AD	1
Wrexham	LL12 8BB	1
Wrexham	LL12 8NG	1
Wrexham	LL12 8XU	1
Wrexham	LL12 9AJ	1
Wrexham	LL13 0AJ	1
Wrexham	LL13 0LX	1
Wrexham	LL13 0NT	1
Wrexham	LL13 7AF	1
Wrexham	LL13 7BE	1
Wrexham	LL13 7DW	1
Wrexham	LL13 7DY	1

Wrexham	LL11 2SA	1
Chester	CH3 9FY	1
Wrexham	LL14 2TR	1
Hanmer	SY13 3DW	1
Northop	CH6 5LH	1
Chester	CH1 4AH	1
Denbigh	LL16 3NS	1
Deeside	CH5 1XE	1
Caergwrle	LL12 9EY	1
Rhyl	LL18 3HL	1
Wrexham	LL12 0NB	1
Hawarden	CH5 3SL	1
Wrexham	LL11 6TW	1
Caegwrle	LL11 5LH	1
Wrexham	LL12 8YL	1
Flintshire	CH6 6JN	1
Ewloe	CH5 3SJ	1
Wrexham	LL12 7YN	1
Wrexham	LL12 0RD	1
Wrexham	LL11 4TA	1
Barmouth	LL42 1NW	1

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Wrexham	LL13 7HN	1
Wrexham	LL13 7NX	1
Wrexham	LL13 7NZ	1
Wrexham	LL13 7QF	1
Wrexham	LL13 7QN	1
Wrexham	LL13 7SE	1
Wrexham	LL13 7SY	1
Wrexham	LL13 7TN	1
Wrexham	LL13 7TR	1
Wrexham	LL13 7UA	1
Wrexham	LL13 7UE	1
Wrexham	LL13 7UL	1
Wrexham	LL13 7UN	1
Wrexham	LL13 8 UY	1
Wrexham	LL13 8AF	1
Wrexham	LL13 8BT	1
Wrexham	LL13 8DS	1
Wrexham	LL13 8EE	1
Wrexham	LL13 8EH	1
Wrexham	LL13 8EJ	1
Wrexham	LL13 8EY	1
Wrexham	LL13 8HF	1
Wrexham	LL13 8NH	1
Wrexham	LL13 8NR	1
Wrexham	LL13 8TL	1
Wrexham	LL13 9AB	1
Wrexham	LL13 9AW	1
Wrexham	LL13 9BH	1
Wrexham	LL13 9BS	1

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Wrexham	LL13 9DB	1
Wrexham	LL13 9DP	1
Wrexham	LL13 9EF	1
Wrexham	LL13 9HX	1
Wrexham	LL13 9LU	1
Wrexham	LL13 9NY	1
Wrexham	LL13 9PF	1
Wrexham	LL14 1AD	1
Wrexham	LL14 1BL	1
Wrexham	LL14 1PU	1
Wrexham	LL14 1SE	1
Wrexham	LL14 2DL	1
Wrexham	LL14 2ES	1
Wrexham	LL14 2EU	1
Wrexham	LL14 2HW	1
Wrexham	LL14 2ND	1
Wrexham	LL14 2NF	1
Wrexham	LL14 2PE	1
Wrexham	LL14 2PF	1
Wrexham	LL14 2PS	1
Wrexham	LL14 3PW	1
Wrexham	LL14 4EB	1
Wrexham	LL14 4JF	1
Wrexham	LL14 5LF	1
Wrexham	LL14 6DH	1
Wrexham	LL14 6NU	1
Cheshire	WA6 0BL	1
Cheshire	CH65 9BN	1

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PEN Y BRYN:

Staff Postcodes for Pen Y Bryn - Total per Postcode

Town	Postcode	Total
Wrexham	LL13 7TS	4
Wrexham	LL11 3HB	3
Wrexham	LL13 7RY	3
Wrexham	LL11 2NX	2
Wrexham	LL11 3EF	2
Wrexham	LL11 4ED	2
Wrexham	LL127NW	2
Wrexham	LL12 7UR	2
Wrexham	LL13 7SX	2
Denbighshire	LL152DW	2
Wirral	CH49 1SL	1
Flintshire	CH7 1RT	1
Flintshire	CH7 4RA	1
Sir Y Fflint	CH7 6DU	1
Wrexham	LL11 1BA	1
Wrexham	LL11 1EL	1
Wrexham	LL11 1PA	1
Wrexham	LL11 2AT	1
Wrexham	LL11 2AX	1
Wrexham	LL11 2BJ	1
Wrexham	LL11 2DE	1
Wrexham	LL11 2LN	1
Wrexham	LL11 2ST	1

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Resident Postcodes for Pen Y Bryn - Total per Postcode

County	Postcode	Total
Wrexham	LL13 7TD	10
Chester	CH2 1UL	2
Ellesmere Port	CH65 7EG	1
Llandudno Junction	LL31 9HL	1
Flintshire	CH7 1SW	1
Llangollen	LL20 7AF	1
Chester	CH2 1HB	1
Wrexham	LL11 2HU	1
Southport	PR9 9LN	1
Wrexham	LL12 7DF	1
Birkenhead	CH42 4QZ	1
Wrexham	LL14 2BE	1
Bridlington	YO16 4NL	1
Ellesmere Port	CH66 3QZ	1
Llandudno Junction	LL31 9AR	1
South Wirral	CH65 8DU	1
Wrexham	LL14 2LW	1
Wrexham	LL12 0SR	1
Wrexham	LL11 4UX	1
Abergele	LL22 7SY	1
Clatterbridge	CH63 4JY	1
Wrexham	LL14 2NU	1
Ellesmere Port	CH65 9BQ	1

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Wrexham	LL11 2TE	1
Wrexham	LL11 3BQ	1
Wrexham	LL11 3DN	1
Wrexham	LL11 3EU	1
Wrexham	LL11 3RS	1
Wrexham	LL11 3YZ	1
Wrexham	LL11 4DA	1
Wrexham	LL11 4EE	1
Wrexham	LL11 4EF	1
Wrexham	LL11 4EN	1
Wrexham	LL11 4EU	1
Wrexham	LL11 4EZ	1
Wrexham	LL11 4HZ	1
Wrexham	LL11 4LY	1
Wrexham	LL11 4PD	1
Wrexham	LL11 4QD	1
Wrexham	LL11 4QH	1
Wrexham	LL11 4SZ	1
Wrexham	LL11 5AE	1
Wrexham	LL11 5HX	1
Wrexham	LL11 6BQ	1
Wrexham	LL11 6BS	1
Wrexham	LL11 6DF	1
Wrexham	LL11 6LS	1
Wrexham	LL11 6NA	1
Wrexham	LL11 6PU	1
Wrexham	LL11 6RR	1
Wrexham	LL11 6RS	1
Wrexham	LL11 6RT	1

Cardiff	CF14 7XB	1
Mold	CH7 6SL	1
Wrexham	LL14 1SW	1
Wrexham	LL14 2HB	1
Wrexham	LL13 9NU	1
Runcorn	WA7 2FU	1
Wrexham	LL11 4RA	1
Wrexham	LL13 0JR	1
Greenfield	CH8 7JH	1
Wrexham	LL14 4AL	1
Wrexham	LL14 3ER	1
Greenfield	CH8 7ER	1
Wrexham	LL12 8BD	1
Flint	CH6 5AG	1
Wilmslow	SK9 4HR	1
Holywell	CH8 7TZ	1
Ewloe	CH5 3UE	1
Penley	LL13 0LH	1
Blaenau Ffestiniog	LL41 3YP	1
Tywyn	LL36 9DA	1
Liverpool	L3 5TF	1
Anglesey	LL65 2HF	1
Holywell	CH8 9PQ	1
Wrexham	LL11 5SW	1
Wrexham	LL12 9AQ	1
Wrexham	LL12 0NL	1
Church Stretton	SY6 6WG	1
Chester	CH1 2HT	1
Wrexham	LL11 2SA	1

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Wrexham	LL11 6YB	1
Wrexham	LL11 6YN	1
Wrexham	LL11 6YT	1
Wrexham	LL12 0HQ	1
Wrexham	LL12 0LT	1
Wrexham	LL12 0RG	1
Wrexham	LL12 0RP	1
Wrexham	LL12 0SA	1
Wrexham	LL12 7HE	1
Wrexham	LL13 0RN	1
Wrexham	LL13 0RP	1
Wrexham	LL13 7BB	1
Wrexham	LL13 7BE	1
Wrexham	LL13 7BU	1
Wrexham	LL13 7EE	1
Wrexham	LL13 7NR	1
Wrexham	LL13 7PU	1
Wrexham	LL13 7PY	1
Wrexham	LL13 7RS	1
Wrexham	LL13 7SZ	1
Wrexham	LL13 7TL	1
Wrexham	LL13 7TR	1
Wrexham	LL13 8DJ	1
Wrexham	LL13 8DQ	1
Wrexham	LL13 8RG	1
Wrexham	LL13 8SB	1
Wrexham	LL13 8SD	1
Wrexham	LL13 8SL	1
Wrexham	LL13 8UL	1

Flintshire	CH8 7NN	1
Chirk	LL14 5AS	1
Ellesmere Port	CH66 2PX	1
Wrexham	LL13 7GW	1
Shrewbury	SY13 8PP	1
Colwyn Bay	LL28 5YA	1
Wrexham	LL13 8SL	1

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Wrexham	LL13 9BH	1
Wrexham	LL13 9EN	1
Wrexham	LL13 9LU	1
Wrexham	LL13 9NY	1
Wrexham	LL13 9TX	1
Wrexham	LL14 1DP	1
Wrexham	LL141FW	1
Wrexham	LL14 1NG	1
Wrexham	LL14 1RF	1
Wrexham	LL14 1TT	1
Wrexham	LL14 2HB	1
Wrexham	LL14 2RD	1
Wrexham	LL14 2RU	1
Wrexham	LL14 3JE	1
Wrexham	LL14 5ER	1
Wrexham	LL14 5PG	1
St Asaph	LL17 ONP	1
Trevor	LL20 7TU	1
Trevor	LL20 7UE	1
Whittington	SY11 4BB	1

NUMBER WITHIN CATCHMENT AREA – 18 of 20

OVERALL HOME SERVICES:

Based at Pendine and outreaching within the area

Staff Postcodes for Home Services - Total per Postcode

within catchment	52
outside catchment	1

Town	Postcode	Total	Total
Wrexham	LL11 4LG	3	53
Chester	CH3 6DX	2	
Wrexham	LL11 1EL	2	
Wrexham	LL11 4EF	2	
Wrexham	LL11 4SF	2	
Wrexham	LL13 7YG	2	
Wrexham	LL14 3UQ	2	
Chester	CH2 3EP	1	
Penyffordd	CH4 0GE	1	
Mynydd Isa	CH7 6FZ	1	
Holywell	CH8 7DT	1	
Flintshire	CH8 9EP	1	
Wrexham	LL11 4EH	1	
Wrexham	LL11 2LN	1	
Wrexham	LL11 2NW	1	
Wrexham	LL11 4PF	1	
Wrexham	LL11 4RY	1	
Wrexham	LL11 4SZ	1	
Wrexham	LL11 4UX	1	
Wrexham	LL11 5SH	1	
Wrexham	LL11 5SY	1	

NUMBER WITHIN CATCHMENT AREA – 29 of 29

Job No 4135-1

Wrexham	LL11 6JD	1
Wrexham	LL11 6LQ	1
Wrexham	LL11 6UT	1
Wrexham	LL12 0LR	1
Wrexham	LL12 0TW	1
Wrexham	LL12 7HE	1
Wrexham	LL12 8JW	1
Wrexham	LL12 9DS	1
Wrexham	LL13 7NW	1
Wrexham	LL13 8JB	1
Wrexham	LL13 8JQ	1
Wrexham	LL13 8TA	1
Wrexham	LL13 8TN	1
Wrexham	LL13 9EH	1
Wrexham	LL13 9LQ	1
Wrexham	LL13 9TZ	1
Wrexham	LL14 1PW	1
Pen Y Cae	LL14 2ND	1
Wrexham	LL14 3HE	1
Wrexham	LL14 3NY	1
Wrexham	LL14 3TG	1
Ruthin	LL15 1AY	1
Trevor	LL20 7YS	1
Llangollen	LL20 8BB	1

NUMBER WITHIN CATCHMENT AREA – 23 of 24

OVERALL STAFF & SERVICES SUMMARY AT PENDINE PARK:

Summary of Staff Summerhill Site 449

within catchment	440
outside catchment	9

<u>Page</u>	<u>Total within</u>	<u>Total outside</u>
6	65	0
7	31	1
8	28	0
9	41	0
10	29	0
11	29	0
12	29	0
13	28	2
14	32	3
15	29	0
16	29	0
17	18	2
18	29	0
19	23	1
TOTALS:	440	9

OVERALL RESIDENTS SUMMARY AT PENDINE PARK:

Summary of Residents Summerhill Site – total 234

within catchment	168
outside catchment	66

<u>Page</u>	<u>Total within</u>	<u>Total outside</u>
6	25	14
7	10	16
8	0	0
9	43	7
10	25	4
11	17	4
12	0	0
13	0	0
14	21	10
15	20	9
16	7	2
17	0	0
18	0	0
19	0	0
TOTALS:	168	66

OVERALL CURRENT RESIDENT SUMMARY AT PENDINE PARK:

CONCLUSION:

From the above data, it is clear to see that the numbers of staff and residents at Pendine Park who also live within the River Dee, Bala Lake and Dee Estuary catchment area is a high percentage, and the percentages of staff or residents within & outside the catchment area are :

personnel	Within catchment	Outside catchment	Percentage within compared to outside	Percentage within compared with total
Staff & Services	440	9	97.96%	98.0%
Residents	168	66	60.71%	71.79%
Totals: of 683 staff & residents	608	75	87.67%	89.02%

Table 1

The previous assessment report identified Staff & services from within the catchment area to be 441 where it is now 440 and outside the catchment area previously 8 and now it is 9. The previous assessment report identified Residents from within the catchment area to be 172 where it is now 168, and outside the catchment area previously 62 and now it is 68. The Services staff were already included in the overall staff count, and therefore this report has omitted the row in the above conclusion table.

One can conclude that the staffing and home services staff numbers will remain reasonably consistent in that staff will remain to be living close to their point of employment in this sector of work. One would expect the resident numbers to be from a wider geographical coverage, and for the percentages to fluctuate over time, but we are advised that around the 75%-80% is a fair reflection on resident catchment.

Based on the expectation that the numbers will also be from the same areas for the new development leads one to conclude that the additional impact of Pen Y Don will have a negligible effect, and will not be “substantial” as defined by the NRW. The proposed Pen Y Don facility is designed as a 75 bed care centre, with a new-staff intake expected to be in the region of 20-30 persons, with existing staff at Pendine Park also servicing Pen Y Don.

The projection based on existing numbers would therefore be that 87.67% of those working and residing at Pen-Y-Don would be from the Dee/Bala Lake SAC Catchment area, meaning the current percentage of those from outside the catchment area is 12.33%.

In the review dated 18th April 2023, McC have very carefully checked each and every postcode on the Pendine Park Excel sheets for Staff & Residents against the NRW Catchment area plan (Source: **Figure 1.1 River Dee catchment (source NRW Dee Management Catchment Summary)**) and have

accurately overlaid the catchment area plan onto an Ordnance Survey map of the area in order to determine the location of each postcode relative to the Catchment Area boundaries provided by the NRW Dee Management Catchment Summary Section 2 Figure 1 Map, also used in Wrexham's EBNB04 policy.

Where postcodes sit close to the boundary of the catchment area or if the postcode area sits across the catchment area boundary McC have taken a cautious Approach and have categorised the postcode to be outside the catchment area, this is illustrated in the very minor variations from 441/440, 8/9, 172/168 and 62/66. The summary of these minor variations result in a -2.82% change in those living in the catchment area.

In Wrexham Council's email dated 3rd April 2023 the Council claimed that the above figures were not robust, however we have been extremely careful in reviewing the information against an accurately positioned catchment area boundary as prepared by the NRW and included in the Council's policy document EBNB04, and we can professionally confirm that the above figures are true, very robust and factual.

In The Council's email they raise the point about the percentage of residents being higher rather than the overall combined percentage. This is correct, however the number of persons residing at Pendine Park is also significantly less in comparison with the staffing numbers who service the residents, with 449 staff compared with 234 residents. Therefore the impact in terms of staff foul waste discharge per person at Pendine Park is nearly twice that of the residents, and therefore to concentrate solely on the numbers of residents is not a correct reflection of the foul water waste impact for the whole site in its day to day operation.

The NRW Phosphates Guidance does not differentiate between staff & residents. We refer again to the actual wording of the NRW's guidance to LPA's in that :-

The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to phosphorus inputs, as there is unlikely to be a source of additional phosphorus or pathway for impacts:

- *developments intended to provide services, facilities, commercial sites, or places of employment (e.g., community buildings, schools etc.) for a local population already served by residential connections to existing public or private sewers discharging within the SAC river catchment*

The NRW's statement is clearly considers all persons on site when assessing developments.

In following the guidance therefore one looks at the overall occupancy of the site as it currently stands (the above figures) and then project it to the numbers as it will operate when Pen-Y-Don is completed.

Presently, 75 staff & residents are from outside the catchment area from a total of 683. That is 10.98%

When Pen Y Don is operational, there will be 75 patient beds and approximately 20-30 additional staff to supplement those already at Pendine Park to administer care. Let's accept that the percentage of residents will remain largely the same as at present, which from the above figures is 39.29%

39.29% of 75 beds is 29.47 people – lets round it up to 30 residents.

The staffing levels are almost all from within the catchment area at 97.96%, or 2.04% from outside the catchment, so for an estimated 25 new staff, that would equate to half a person. Accepting we rounded up the resident figure, we'll round down the staffing figure to balance, and therefore no additional new staff will come from outside the catchment area for the purposes of this calculation.

So, let's add the current figures to the projected figures as follows based on 75 additional beds and 25 new staff :

	Present operations at Pendine Park		Projected operations to include Pen-y-Don		Percentage change from current to proposed
	Within catchment	Outside catchment	Within catchment	Outside catchment	
Staff & Services	440	9	465 (25 new staff [440 + 25])	9	
Residents	168	66	213 (45 extra residents from within catchment area [168 + 45])	96 (extra 30 persons from outside catchment area [66 + 30])	
Sub Totals	608	75	678	105	
Total persons on site	683		783		
Total staff and residents from <u>outside</u> the catchment area as a percentage of all use on site at Pendine Park site.	$\frac{75}{683} \times 100 = 10.98\%$		$\frac{105}{783} \times 100 = 13.41\%$		2.34%

Table 2

The whole intention of the NRW guidance is to allow the processing of planning applications where a project **does not have a significant effect** on the river SAC. The site wide difference of this project based on existing occupation against projected occupation in terms of any increase from those living outside the catchment area is +2.34%, a very minor change and therefore one that does not present a significant effect on that already existing at Pendine Park.

The guidance is about the amount of foul drainage flowing from a site, and the NRW's latest position is to allow consideration of project where the persons working or residing at a site also have their main residences within the catchment area, on the basis that they cannot be in two locations at the same time within the catchment area, and so their nett contribution will be a neutral one. The consideration is then about the degree of increase a project may have where persons come in from outside the catchment area.

The above calculation takes a practical look at how much increase of foul water the development might present to the catchment area as a whole, which is exactly the emphasis the NRW places in their guidance. The NRW's emphasis is about controlling the amount of additional foul water outfall, and pragmatically allowing the consideration of projects that do not present significant effects on the drainage system.

- The above increase of 30 residents from outside the catchment area when balanced against the whole-site occupancy of 783 persons is 3.83% (30 divided by 783 times 100).
- As per Table 2, the percentage increase from the current persons from outside the catchment area to projected persons outside the area is 2.34%
- Looking at the projected persons outside the catchment area compared with the projected total persons on site is 15.37% (105 persons outside divided by total persons on site 683 times 100) compared with the present figures for the site of 10.98% as previously reported (75 persons divided by total of 683 on site, times 100)

It would be misleading just to consider the residents in isolation because that is not the correct reflection of the site's overall drainage, and in our Professional Opinion not the intention set out by the NRW in considering site outfalls.

Therefore, it is reasonable still to conclude this application should progress to be considered and determined by Wrexham County Borough Council as being within the scope of the NRW's guidance where this development is **not likely to have a significant effect on a river SAC in relation to phosphorus inputs** and on planning balance when considered against the significant community and health benefits this specialist care centre will bring to the area, the impact is most certainly not a significant one, and the Local Authority would be justified in screening this application out as one that does not present a significant effect on the Dee/Bala lake SAC in relation to Phosphates levels.

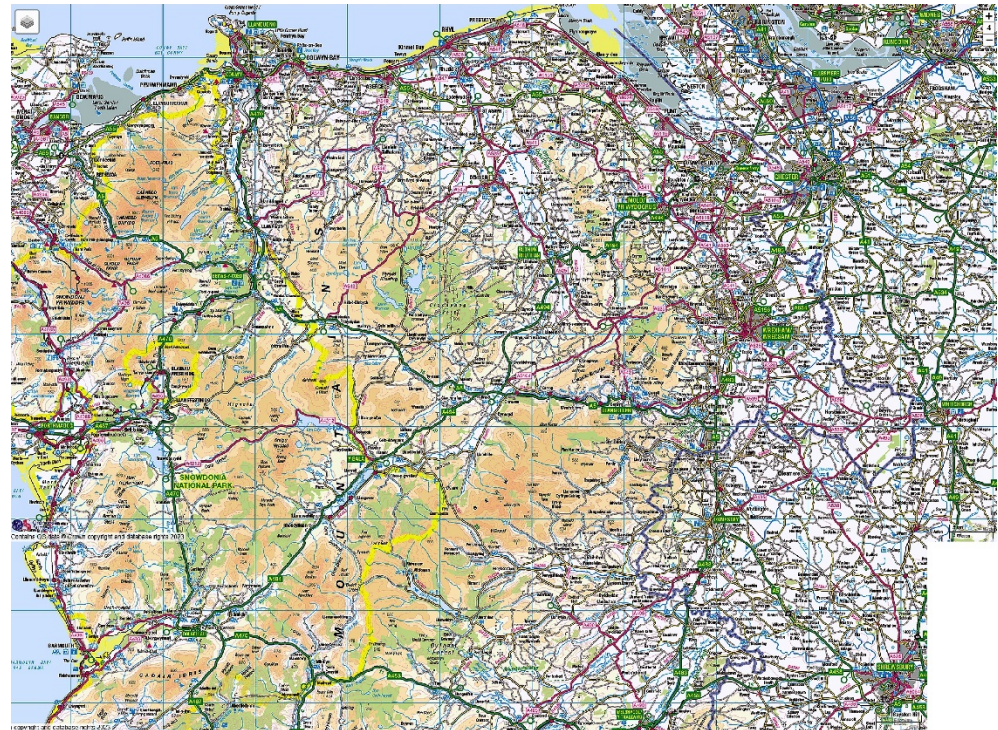
We would welcome your further review on the matter please in allowing the application to proceed through the planning process.

End – 18th April 2023 / GMR

Supplementary images of catchment area plans & maps.



Figure 1 - source NRW Dee Management Catchment Summary / EBNB04



Ordnance Survey Landranger mapping

