

Our Ref: 61863/MJD

Your Ref:

24 June 2022

Mr M Golightly
Merkur Casinos
1a Seebeck House,
Seebeck Place
Milton Keynes,
MK5 8FR

Dear Mr M Golightly

Re: Unit 4, 9-11, Regent Street, Wrexham

Further to your instructions to complete a foul water assessment, for the replacement toilet in the above unit in Wrexham. We understand the unit to be within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC), as determined by Natural Resources Wales (NRW).

We are pleased to set out the foul water assessment for the unit and indicate our findings below.

The existing layout is as indicated on drawing 999-EX-01 Rev 01 dated 16.3.22 and the proposals are based on the drawing 999-PL-10 Rev 00 dated 14.6.22, both attached for reference.

Existing Site and Context

The site is in the centre of Wrexham and understand that it has had previous use as a furniture store and a CD/DVD store, in recent years since 2014.

The unit is furnished with an existing single toilet.

The site is located in the catchment for the River Dee for foul water treatment.

The natural catchment for the surface water for the River Dee is shown on Figure 1 attached.

The site currently discharges into the main sewerage within Wrexham.

The site is likely to discharge to either the Dee Sewage Treatment Works (STW) or the Gresford STW, which can be seen on Figure 2 attached.

The extent to the existing catchment for STW's into the River Dee area can be seen on Figure 3, attached, which covers the areas below in Table 1:

Cont'd.../
4 The Old Church
St Matthews Road Norwich
Norfolk NR1 1SP

Telephone: 01603 230240
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Table 1 – STW's locations and capacity (2018) - Data from the European Commission Urban Waste Water Website.

Location of STW	Capacity Population	Entering Population equivalent	Headroom (Spare capacity)
Bala	31205	5340	25865
Llangollen	4376	4376	0
Cefn Mawr	7045	7045	0
Whitechurch	11107	11107	0
Dee	142769	122194	20575
Gresford	194434	194434	0
Tattenhall	2290	2290	0
Lavister	46529	46529	0
Hope	8752	5655	3097
Buckley	15193	15193	0
Mold	21987	21657	330
Chester	117034	115263	1771
Queensferry	65181	52663	12518
Connahs Quay	18776	18567	209
Neston	18268	18268	0
Flint	27686	26257	1429
Heswell	9359	9359	0
Greenfield	19146	16059	3087
Mostyn	4722	4338	384
LLanasa	34916	3385	31531
Totals	800775	699979	100796

By assessing the data in Table 1, there appears to be a substantial population in the catchment of the River Dee (as of 2018) which is approximately 699979 persons equivalent.

It is also noted from information from the client that the customers are normally local people using the facility, gained from anecdotal evidence from over 200 other similar sites operated by the client in England and Wales.

The nearest sites to the one proposed in Regent Street, Wrexham are Runcorn, Telford and Crewe. To assess the distance that the nearest alternative sites are from the Wrexham site, a table of the information is presented in Table 2.

Table 2 – Location and distance of Nearest Alternative Merkur Slots Machine Sites

Location	Distance from Wrexham (Miles)	Distance to boundary of Foul and Surface Water Catchment (Miles)	% of distance between next nearest locations within the River Dee Catchment
Runcorn	20	12	60%
Telford	34	12	35%
Crewe	24	12	50%

It can be seen that the catchment for surface water and foul water, is in the main, already closer to the Wrexham site than to the alternative Merkur Slots locations, in Runcorn, Crewe and Telford. This indicates that should people wish to travel to a Merkur slot machine site and suggesting they would travel to their nearest one, the population boundary and geographic boundary are approximately halfway between the sites, thus concluding that the natural catchment of the population arriving at the site is already within the surface water and foul water catchment for the River Dee, thus not increasing the use within the catchment or phosphorus discharge to the River Dee.

The Proposal for the Unit

The unit is to have minor amendments to relocate the existing toilet within the unit to make it more accessible rather than having to access steps to the toilet.

The existing toilet was used by members of staff and offered as required to customers, as we understand.

It is also noted from information from the client that the customers are normally local people using the facility, gained from anecdotal evidence from over 200 other similar sites operated by the client in England and Wales.

It is extremely unlikely that the toilet would be used by persons other than those using the slot machines, ie local people or visitors to the area, given the nature of the venue and age restrictions to enter. These persons wishing to use the toilet on a visit to the area are more likely to use other local facilities such as public toilets, fast food outlet, café or department store.

The use of the existing toilet already on site has a certain level of discharge and it is assumed that this could be a 6 or 9 litre flush capacity.

The proposal would be for the relocated accessible toilet to have a low flush of 4 or 6 litres, which is specified as a Ideal Standard, Tempo Close Coupled Toilet and cistern which could limit the water use on the site and be approximately 2 to 5 litres smaller than the previous cistern, per flush.

Wrexham Planning Policy Guidance Reference

The Wrexham Planning website includes data in the document "New river phosphate level targets" on sites that may be affected, which include:

"Types of development that may be affected include (this list is not exhaustive and is subject to review):

- *New residential units including homes, gypsy and traveller sites/pitches.*
- *Tourism attractions and commercial developments where overnight accommodation is provided.*
- *Agricultural development, including prior notifications (developments that don't require planning permission, but where we need to check that it is allowed) including additional barns and slurry stores likely to lead to increased herds.*
- *Prior notifications for change of use of office to homes and agricultural buildings to homes.*
- *Operations which generate phosphate such as fisheries and car washing facilities.*

Currently we are unable to process some applications of this type. Our position will be updated once we have received further guidance and are able to measure and mitigate the impact on phosphate levels."

It is to be noted that this amendment to the unit does not include any overnight accommodation or increase in toilet facility that may add sewage to the catchment.

NRW Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation

The NRW website states 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:

- *any development that does not increase the volume of foul wastewater*
- *any development that improves existing water quality discharges by reducing the phosphorus load of wastewater, or by decreasing the volume of wastewater produced (e.g. by improvements to existing wastewater treatment infrastructure)*
- *private sewage treatment systems discharging domestic wastewater to ground, built to the relevant [British Standard \(BS 6297:2007+A1:2008\)](#) as long as the maximum daily discharge rate is less than 2 cubic metres (m3), the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and is located more than 50m from a SAC boundary.*

Also, to ensure that there is no significant in combination effect, the discharge to ground should be at least 200m from any other discharge to ground. The density of discharges to ground should also not be greater than 1 for every 4ha (or 25 per km2)."

As indicated in our assessment we have shown that the site does not increase the volume of foul wastewater and the replacement toilet has a lower cistern volume, thus reducing the volume of foul wastewater from the site.

Conclusions

The removal of the existing toilet to be replaced with a new accessible toilet with a smaller flush capacity, is a reduction in flow from the unit, as demonstrated above. There is unlikely to be an increase in the use by persons from outside of the area of the catchment for the River Dee, given the evidence above.

Therefore, given the foul water assessment completed, it is shown that the development will not impact on the phosphorus levels in the River Dee.

We trust these details above meet with your approval but if you have any queries or require any further clarification, please do not hesitate to contact me.

Yours sincerely



Martin Doughty (Director) BEng (Hons) CEng FICE FCIHT MAPM
on behalf of Richard Jackson Ltd
encs

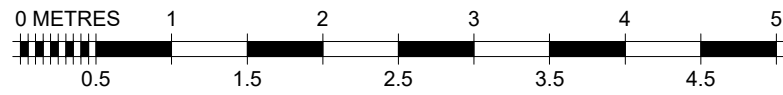
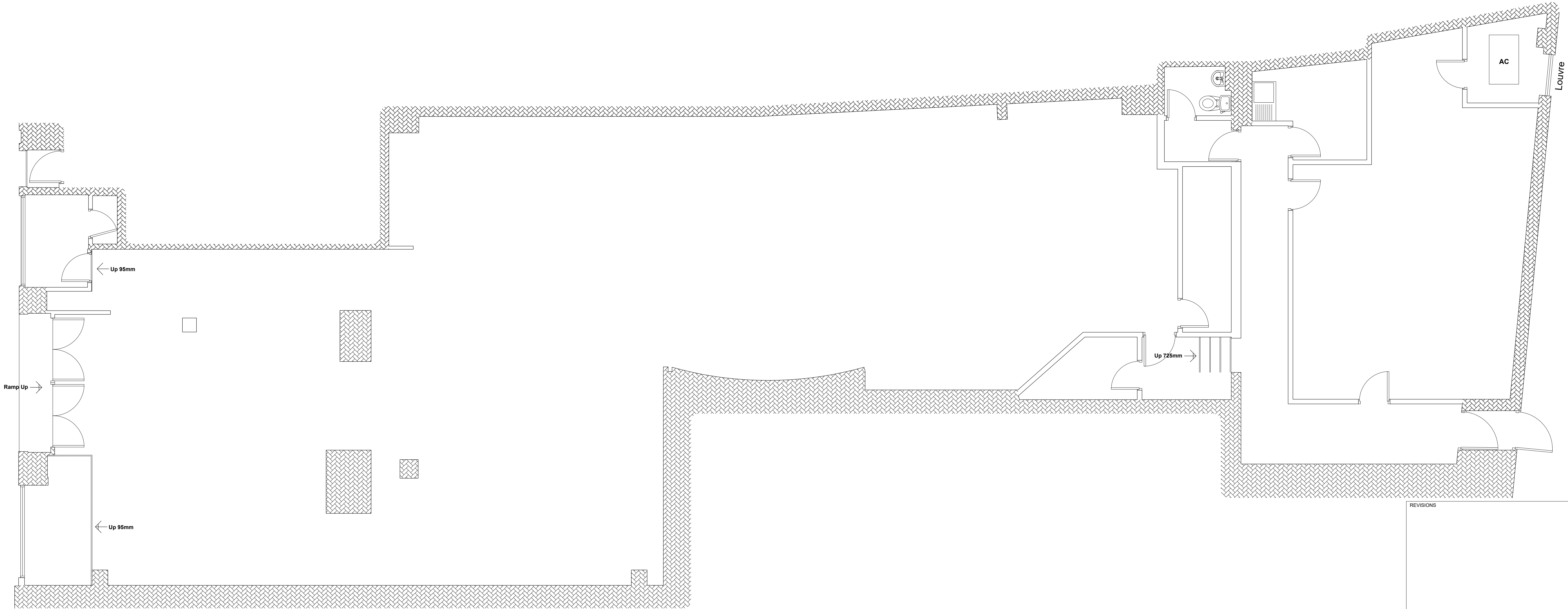
Drawing 999-EX-01 Rev 01 dated 16.3.22

Drawing 999-PL-10 Rev 00 dated 14.6.22

Figure 1 – River Catchment Data

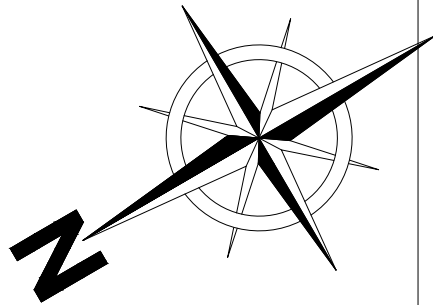
Figure 2 – Gresford and Dee STW Locations

Figure 3 – Locations of existing STW's



TOTAL GROUND FLOOR AREA	
EXISTING USE: RETAIL	
333.5m²	3589.9ft²

EXISTING GROUND FLOOR GENERAL ARRANGEMENT PLAN



REVISIONS

CHANGE OF USE

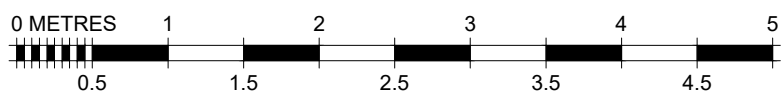
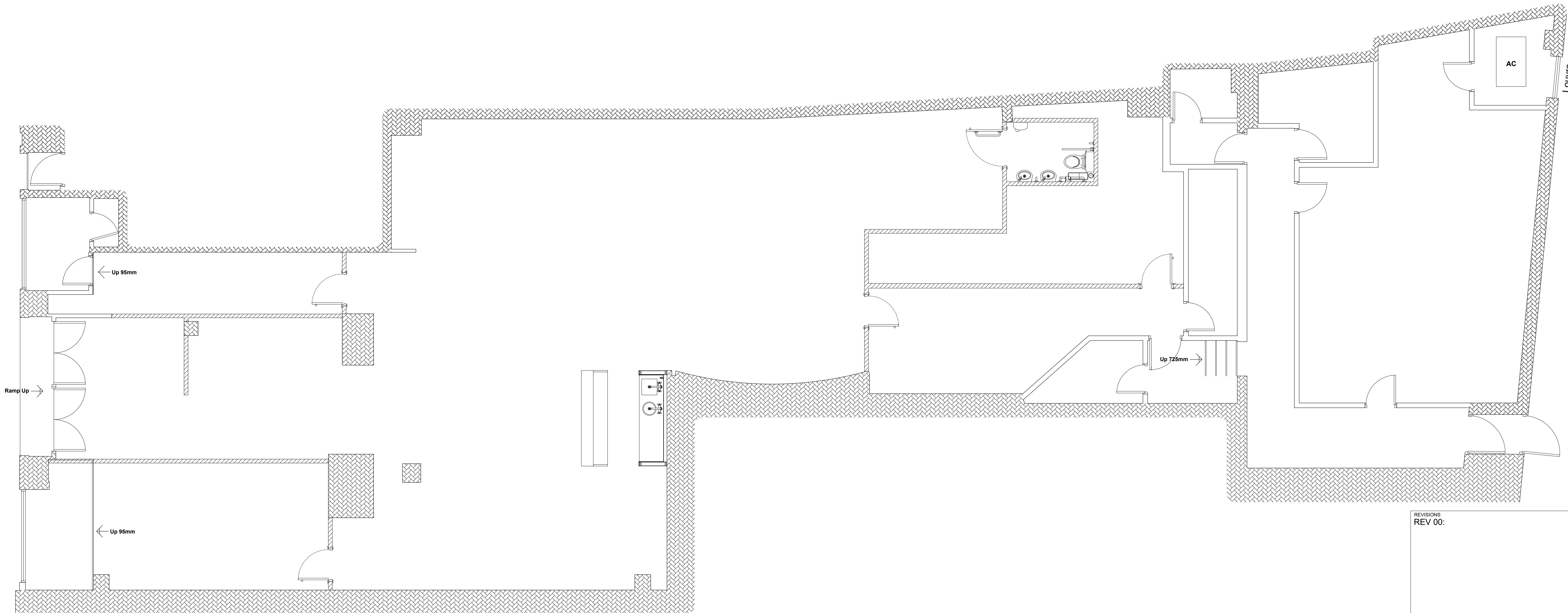
FIT OUT TYPE
CONCEPT 2

PROJECT
MERKUR SLOTS
UNIT 4, 9-11 REGENT STREET
WREXHAM
LL11 1SG

DESCRIPTION
EXISTING GROUND FLOOR

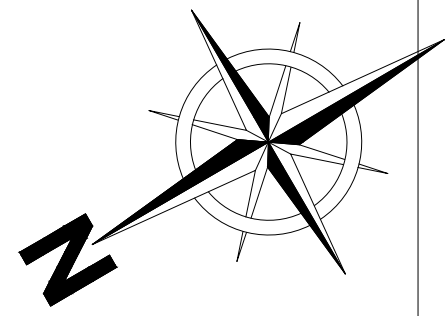
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DRAWING No. 999-EX-01	REVISION 01	

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TOTAL GROUND FLOOR AREA PROPOSED USE: AGC	
333.5m²	3589.9ft²

PROPOSED GROUND FLOOR GENERAL ARRANGEMENT PLAN



REVISIONS
REV 00:

CHANGE OF USE

FIT OUT TYPE
CONCEPT 2

PROJECT
MERKUR SLOTS
UNIT 4, 9-11 REGENT STREET
WREXHAM
LL11 1SG

DESCRIPTION
PROPOSED GROUND FLOOR

DRAWN BY	SCALE	DATE
MG	1:50	14/06/22

DRAWING No.	REVISION
999-PL-10	00



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Unit 4 – 9 to 11 Regent Street, Wrexham – Foul Water Assessment

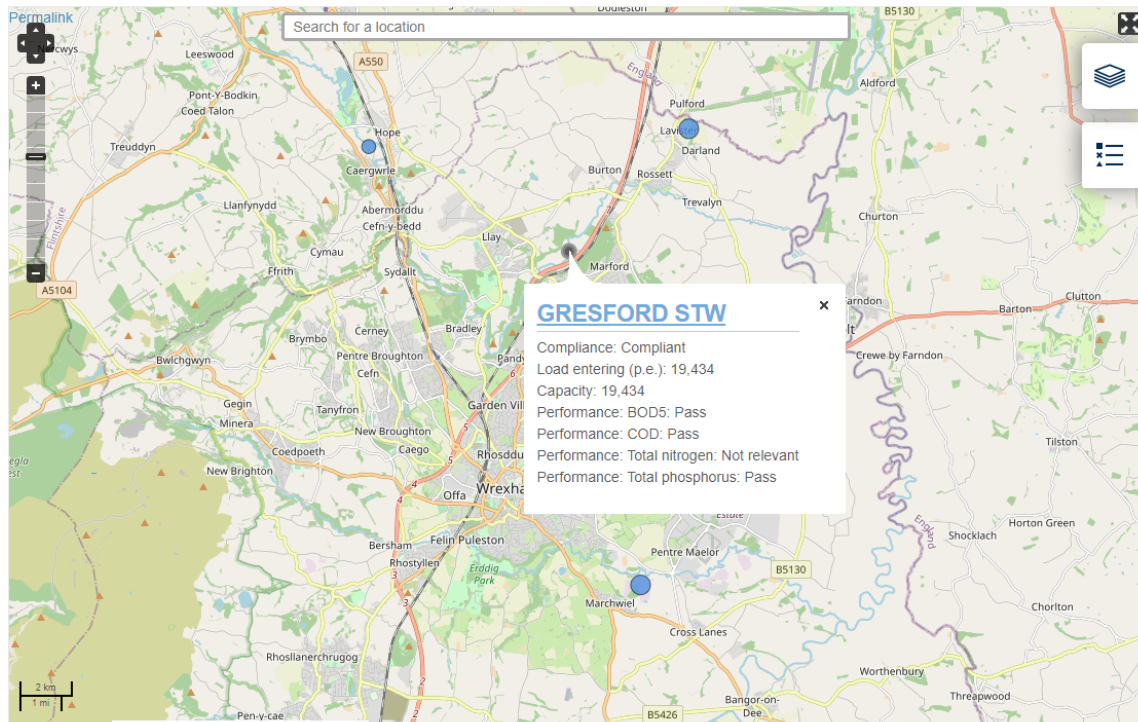
Figure 1 - River Catchment data from DEFRA, Catchment Data Explorer updated 1 Feb 2022, extract taken from website 15.6.22

River Dee Catchment (<https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/11>)



Figure 2 - Gresford and Dee STW Locations

Gresford STW (Outfalls to River Alyn, a contributory to the River Dee)



Dee STW

Outfalls to the River Dee

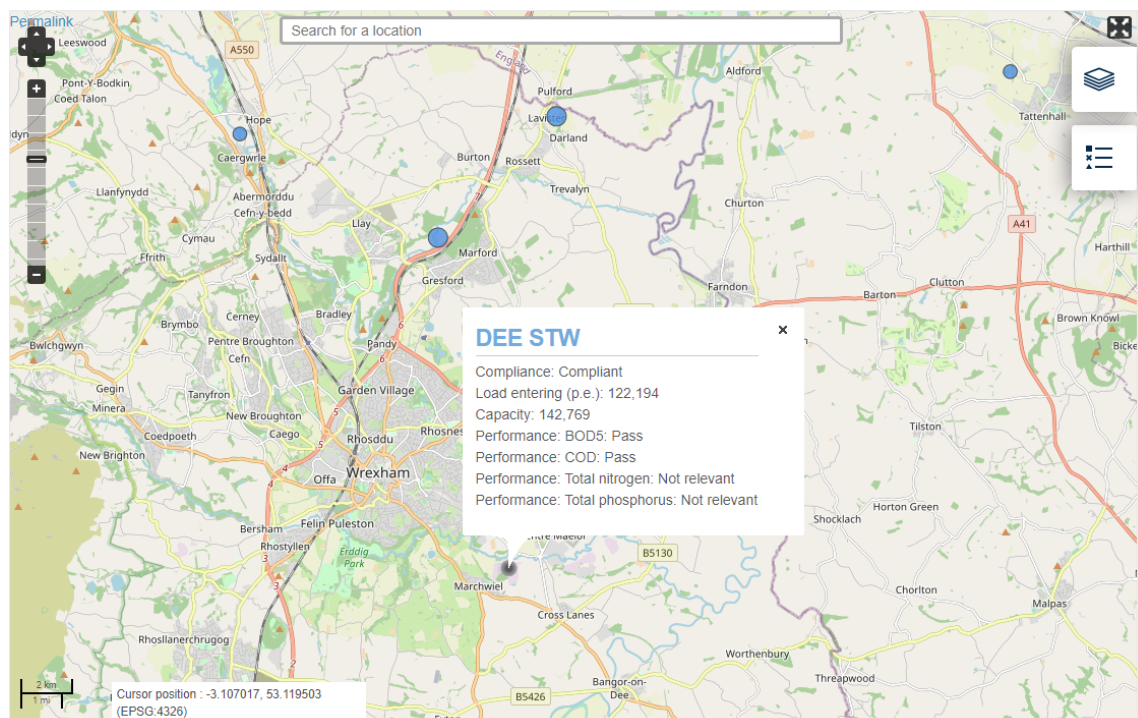


Figure 3 - Locations of existing Sewage Treatment Works (Dated 2018) and Surface Water Catchment for River Dee in Red

