Your ref: P/2025/0167
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07 November 2025

Dear Planning Officer

Memo in relation to wastewater discharges and phosphates – Trotting Mare Caravan Park

This memo is prepared in response to the Council's requests for further information around nutrient neutrality and possible increases in phosphates from the Trotting Mare Caravan Park.

Comment was made by NRW in their feedback dated 17th March 2025 that the "*Flows and Loads – 4: Sizing Criteria, Treatment Capacity for Sewage Treatment Systems, by British Water demonstrates that the loadings for sewage treatment systems are greater from fully serviced static caravans than from touring caravans.*"

The extract from the *Flows and Loads* document[1], lists "touring not serviced" caravan sites as producing 100L of wastewater flow per person, per activity, per day. By contrast, static, fully serviced caravan sites are identified as producing 150L of wastewater flow per person, per activity, per day.

AMENITY SITES	
Toilet Blocks (per use)	10
Toilet (WC) (per use)	10
Toilet (Urinal) (per use)	5
Toilet Blocks in long stay car parks/lorry parks (per use)	10
Shower (per use)	40
Golf Club	20
Local community sports club, e.g. squash, rugby & football	40
Swimming (where a separate pool exists without an associated sports centre)	10
Health Club/Sports Centre	50
Tent sites	75
Caravan Sites - (i) Touring not serviced	100
(ii) Static not serviced	100
(iii) Static fully serviced	150

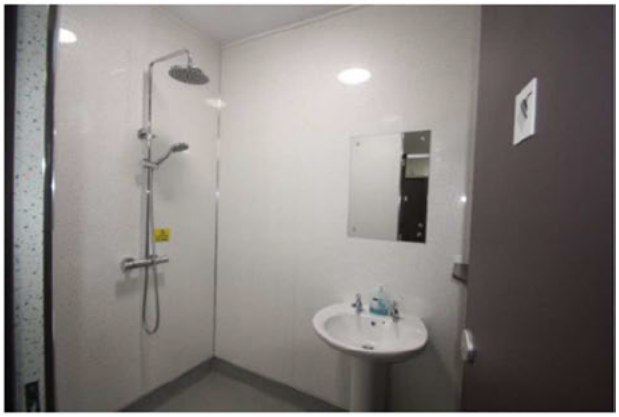
[1] British Water flows and loads.pdf

While the current touring pitches are not individually serviced, there are nevertheless services available onsite. As illustrated in the images below, the site provides communal bathroom facilities within a purpose-built ablutions block onsite.



Facilities block – toilets, sinks, showers





Photos showing the established bathroom facilities for use by touring pitches.

In accordance with the listed 'amenities' on the British Water *Flows and Loads* document, a shower and toilet use result in an additional 40L and 10L of wastewater flows being produced per person, per day.

It can therefore be concluded that the current 18 static pitches would result in:

- 100L as per the "touring not serviced" entry; PLUS
- Assumed one shower per person, per day producing a further 40L; PLUS
- At least one usage of the toilet facilities per person, per day, producing a further 10L.

This equates to 150L of wastewater flow per person from the current touring pitches, being directly comparable to the 150L for a "static fully serviced" activity.

The change of from touring to static sites is therefore not considered to result in an increase in wastewater or consequential phosphorus discharges into the environment that could impact upon the River Dee and Bala Lake SAC.

As previously advised, the client has already obtained Building Regulations approval for the upgraded treatment tank. The system discharges directly into Shropshire and therefore falls entirely outside the River Dee SAC catchment in Wrexham. On this basis, there should be no pathway by which the proposal could contribute to phosphate loading within the SAC. In line with NRW guidance, phosphate considerations should only be engaged where there is a likely connection into the SAC, and we remain of the view that there is no clear or direct connection.

I trust the submitted details are sufficient and support you in your consideration of this submission.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

[redacted]

Lyndsey Fisher
Planning Consultant
Halls Holdings Limited