Aubourn Architecture

SUPPORTING STATEMENT: PHOSPHATE NEUTRALITY ASSESSMENT

Proposed Warehouse Units at Former Co-Operative Store, Well Street, Cefn Mawr (Ref: P/2024/1618)

1. INTRODUCTION

This Supporting Statement has been prepared in response to the request from Wrexham County Borough Council for evidence demonstrating that the proposed development of additional warehouse units at the former Co-operative store, Well Street, Cefn Mawr, would not result in an increase in foul drainage or phosphorus loading to the River Dee and Bala Lake Special Area of Conservation (SAC).

The purpose of this statement is to clearly set out the factual baseline of the existing site conditions, the nature of the proposed development, and the rationale demonstrating that the proposal does not increase the number of users or foul flows beyond historic levels associated with the former, publicly accessible Co-operative store.

2. BACKGROUND AND PLANNING CONTEXT

The existing building on the site formerly operated as a Co-operative convenience store. This use comprised:

- A publicly accessible retail environment;
- Publicly accessible customer toilet facilities;
- Staff welfare facilities related to the former A1 retail use.

A previous change of use application for the building, from A1 Retail to B1 Business and B8 Storage, was considered by Natural Resources Wales (NRW). In their consultee comments, NRW stated that:

"... the development results in a small number of local people being employed at the site and would therefore make provision for the local population already served by residential connections to the existing public sewer discharging within the SAC river catchment. We are therefore satisfied that it is unlikely to increase the amount of phosphorus entering the catchment."

This conclusion establishes an important baseline: the change of use of the existing building did not result in an increase in phosphate loading because it was served by local employees whose wastewater is already accounted for within existing residential connections to the foul sewer network.

3. EXISTING SITE CONDITIONS

As a former public-facing convenience store, the lawful historic use of the building included:

- Public access throughout trading hours;
- Customer WC facilities available for continuous use by potentially significant visitor numbers;
- Site capacity for upwards of 60 visitors at any one time, assessed from historic car parking provision alone.

The existing site therefore had the potential for high fluctuations and peak occupancy, with associated foul drainage demand generated by a combination of:

- Retail staff;
- Delivery operatives;
- Members of the public using the store and its toilet facilities.

4. PROPOSED DEVELOPMENT

The current proposal (Ref: P/2024/1618) comprises the erection of five warehouse units, each containing:

- A single private WC and sink;
- Facilities limited to staff/occupier use only;
- No public access or visitor toilet provision.

The operational nature of these units inherently restricts usage to:

- A small number of employees per unit;
- Predominantly local tradespeople and small-scale operators.

This falls squarely within the definition of a local facility as referred to in NRW's "Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation."

5. ASSESSMENT OF FOUL WATER GENERATION AND PHOSPHATE IMPACT

When comparing the established baseline with the proposed development, the following points are critical:

5.1. REDUCTION IN PUBLIC ACCESS

The previous retail use enabled unrestricted public access. The proposed warehouse units explicitly do not provide publicly accessible toilets or visitor welfare facilities. As a result, the potential number of users generating foul waste at the site will be significantly reduced compared to the former Co-operative store.

5.2. LOCAL WORKFORCE ALREADY COUNTED IN PHOSPHATE CATCHMENT

In line with NRW's previous conclusion for the change of use application:

- The employees of the proposed units are either residents of or already employed within the catchment area;

- Their wastewater generation is already accounted for within the existing residential foul sewer network;

- No new overnight accommodation, population uplift, or significant visitor attraction is proposed.

5.3. MODEST SCALE OF FACILITIES

Each unit contains only a single WC and small wash basin. These represent the minimal level of sanitation required for workplace compliance. In aggregate, the wastewater generated:

- Is substantially less than the historic peak potential of a public convenience within a retail environment;

- Does not result in a material increase in daily or peak foul discharge.

5.4. NO MATERIAL INCREASE IN FOUL FLOW COMPARED WITH HISTORIC USE

Taking into account:

- The historic presence of public-use toilet facilities;
- The historic potential for substantial visitor numbers;
- The restricted private use of the new units;
- The limited number of employees per unit;

It is concluded that the development does not increase foul drainage from the levels historically associated with the lawful use of the site.

6. COMPLIANCE WITH NRW PHOSPHATE GUIDANCE

NRW's guidance sets out the requirement to demonstrate that a development:

- Does not increase population served;
- Does not introduce new overnight accommodation;
- Does not intensify use of the sewer network by persons not already accounted for within existing catchment population.

The proposed development meets these criteria because:

- It serves only local staff previously accounted for within existing residential sewer loading;
- It removes previous public visitor usage;
- It introduces no new residential or high-intensity uses;
- It materially reduces the frequency and volume of foul flows compared to the former public retail use.

7. CONCLUSION

Based on the evidence and reasoning outlined above, it is concluded that he proposed development will not result in an increase in foul drainage or phosphorus loading entering the River Dee and Bala Lake SAC, and in fact represents a reduction in potential foul discharge when compared to the historic use of the site as a publicly accessible Co-operative store.

The proposal therefore accords with the requirements of NRW guidance and satisfies the tests for likely significant effect under the Habitats Regulations.

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