Your ref: P/2025/0167
Our ref: 12588D v2
E-mail: planning@hallsgb.com
Phone: 01743 450 700

20 January 2026

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.

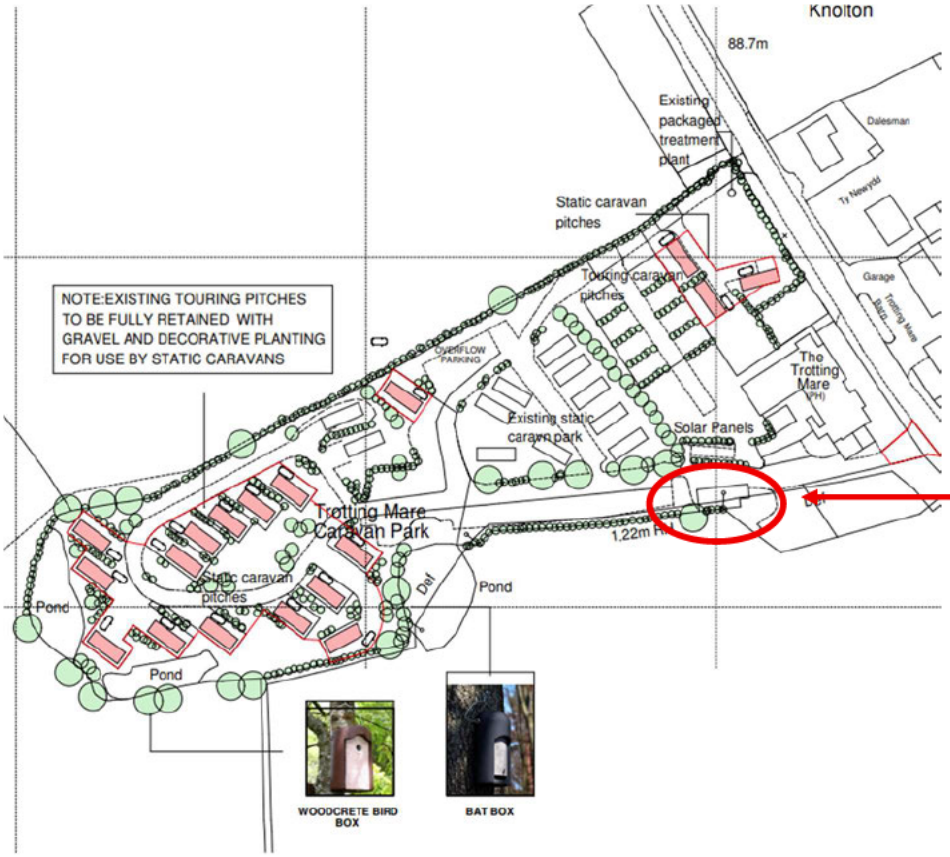
Comment was made by NRW in their feedback dated 17th March 2025 that the "*Flows and Loads – 4: Sizing Criteria, Treatment Capacity for Sewage Treatment Systems, by British Water demonstrates that the loadings for sewage treatment systems are greater from fully serviced static caravans than from touring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

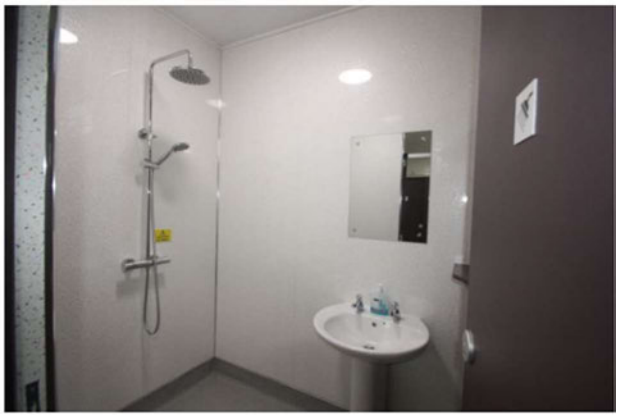
AMENITY SITES	
Toilet Blocks (per use)	10
Toilet (WC) (per use)	10
Toilet (Urinal) (per use)	5
Toilet Blocks in long stay car parks/lorry parks (per use)	10
Shower (per use)	40
Golf Club	20
Local community sports club, e.g. squash, rugby & football	40
Swimming (where a separate pool exists without an 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

The current touring pitches are individually serviced, there for there will no difference in flow (litres) level should the site change from touring to static and they are all serviced pitches. An additional to the serviced pitches there are additional services available onsite. As illustrated in the images below, the site provides communal bathroom facilities within a purpose-built ablutions block onsite. There are no proposed changes to the existing serviced pitches or the existing bathroom facilities.



Ablutions block – toilets, sinks, showers

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

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

- 150L as per the "static fully serviced" entry

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 package treatment plant (Marsh Ultra Polyok sewage treatment plant). The proposed treatment plant replaces an outdated septic tank which historically discharged untreated or partially treated effluent.

https://marshindustries.co.uk/products/ultra-polylok-sewage-treatment-plants/

The new treatment system has been designed and installed in full accordance with the latest Building Regulations and relevant environmental standards. It provides a significantly higher level of treatment, ensuring that the final effluent is clean and suitable for lawful discharge.

This represents a clear and substantial improvement over the previous arrangement. As a result, the site will no longer discharge untreated or poor-quality effluent, delivering demonstrable environmental benefits and an overall betterment when compared with the former system.

In line with NRW guidance, phosphate considerations should only be engaged where there is a likely impact on 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