Richard Purser

From: Tom Miles <tmiles@fi-rem.com>
Sent: 22 January 2026 09:25
To: Sholto McDonald; Richard Purser
Subject: FW: FW: Land at Oak Road - NRW comment on nutrient neutrality NRW:01115329
Attachments: TOS-BML-XX-XX-DR-C-0500 P04 - Drainage Plan Layout.pdf; NRW Phosphates Evidence.xlsx; TOS-BML-XX-XX-DR-C-0520 P04 - Flood Flow Analysis 700 year+0% CC Storm Event.pdf

Follow Up Flag: Follow up
Flag Status: Completed

FYI – The Oaks - attached response on SuDs and Phosphate removal.

Many thanks

Tom Miles Senior Development Manager MSc MRICS
E tmiles@fi-rem.com T 01257 263 010 M 07775 036 551 W www.fi-rem.com

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From: Tom Miles
Sent: 22 January 2026 09:23
To: 'North Planning' <NorthPlanning@cyfoethnaturiolcymru.gov.uk>
Cc: Hughes, Kathryn <Kathryn.Hughes@cyfoethnaturiolcymru.gov.uk>; Jenni Perkins <jenni.perkins@wrexham.gov.uk>; Indira Withana <indira@barnsleymarshall.co.uk>; Alex Mavhunga <alex@barnsleymarshall.co.uk>; Mark Adams <madams@fi-rem.com>; josh.rigby@arthian.com
Subject: RE: FW: Land at Oak Road - NRW comment on nutrient neutrality NRW:01115329

Good morning Sion,

Further to your request for further information on phosphate removal rates on The Oaks site, please find attached a commentary from our flood engineer, Indira, explaining adherence to prevailing Welsh guidance.

I note that the previous response noted SuDs strategy was compliant, I would be grateful if you could confirm that the attached additional information requested is sufficient to close the point?

With regard to the additional consultee return dated the 9th January 2026, I will respond in a separate email to the points raised. In the meantime, if you can provide Matt Ellis's email address that would be appreciated so we can organise a short call regarding Newt Licence requirements.

Many thanks

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From: North Planning <NorthPlanning@cyfoethnaturiolcymru.gov.uk>
Sent: 10 December 2025 14:00
To: Tom Miles <tmiles@fi-rem.com>
Cc: josh.rigby@arthian.com; Hughes, Kathryn <Kathryn.Hughes@cyfoethnaturiolcymru.gov.uk>
Subject: RE: FW: Land at Oak Road - NRW comment on nutrient neutrality NRW:01115329

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Good afternoon Tom,

Thank you for your email.

The Nutrient Neutrality Statement (Arthian Document Ref: 319585-REP-02) sets out the overall approach and principles of how nutrient neutrality can be delivered on site, using a sustainable drainage system (SuDS) scheme. The drainage plan layout including the SuDS scheme is presented in drawing TOS-BML-XX-XX-DR-C-0500. The Neutrality Statement provides a high-level overview of the ability of the SuDS scheme to deliver the mitigation needed. While we accept the general principles presented, we requested further information in our previous response (dated 10/11/2025 ref: **CAS-288516-J8L2)**:

- *While an outline SuDS design has been presented, more detailed information should be provided to **quantify** how specific components of the scheme will deliver the required nutrient benefit.*
- *We advise that detailed information on the phosphorus mitigation of the proposed scheme is provided. In particular, we would like to understand how **exceedance flows have been considered** in the nutrient balance calculations.*

The Statement advised that Nutrient Calculator outputs from Stage 3S would be included but have not yet been provided. In addition, we draw your attention to the Nutrient Calculator guidance:

> ***"4.2.4 Stage 3S**: calculate the nutrient load removed through SuDS.*
>
> *This section is optional. It requires a lot of evidence to be provided alongside the output of this calculator. You do not need to enter any inputs if SuDS are not applicable to the development. In this section you can enter information about the SuDS features used to calculate the amount of nutrients removed through SuDS treatment of surface runoff. This section must only be completed if SuDS are being implemented in accordance with the Flood and Water Management Act 2010 (Schedule 3) and are compliant with the national standards.*
>
> *Any SuDS that are being implemented in addition to the site plans for the purposes of mitigation must not be considered in the nutrient budget calculation for the site. In this instance, it is instead recommended that a second calculation is populated - the People over Wind judgment means that it is no longer possible to apply mitigation measures at the screening stage.*
>
> *SuDS cannot be considered in Flood Zone 3 (areas at risk of frequent flooding) as shown on the NRW Flood Map for Planning (Natural Resources Wales / Flood map for planning). If the SuDS section of the calculator is used, when the calculator output is submitted to the LPA you will also need to submit the calculations and justification of the assumptions used to populate this section of the calculator. In addition you will need to provide:*
>
> *• Design details of each element of the SuDS treatment train*
>
> *• Evidence to justify the nutrient removal rate used*
>
> *• A maintenance plan (for example, the removal of sediment, vegetation management, and details of how the waste arisings would be disposed of to maintain nutrient neutrality principles and comply with the correct environmental permissions)*
>
> ***Removal rates** A SuDS device or treatment train will only treat the proportion of the water which enters the SuDS and they will not treat all flows, including severe storm events. The treated flow for the first SuDS device should be determined based on the catchment area and flows/loads draining to the device. The proportion of the flow/load that bypass and do not enter the SuDS device must be removed. Reductions from the SuDS device via infiltration and conveyed flows should only be applied to this treated flow/load. The treated flow for the second or third devices should be determined based on the flow/load modelled as leaving the previous SuDS device. The SuDS management train should be designed to manage both particulate P and dissolved P. It is essential to check that the influent will contain enough TP to allow treatment to be effective. If the TP level in the influent is too low, then the anticipated level of treatment may not be met."*

In summary, we advise evidence of more detailed consideration of how the SuDS system would work with regards nutrient removal at design level, particularly regarding exceedance flows considering the following:

- SuDS works by slowing down run-off from a site, giving opportunities for sedimentation (where nutrients are retained in particulate form e.g. swales/ditches/attenuation ponds), and where nutrients may be retained in the ground as flow infiltrates through the SuDS component (infiltration features including the above). SuDS features will have a design standard in terms of flow or rate of infiltration.
- where rainfall / run-off exceeds these design standards then the flow is discharged out of the system. So not all rainfall / run-off will be captured and receive nutrient treatment as higher (exceedance) flows will in effect by-pass certain parts of the system. SuDS therefore cannot treat 100% of rainfall for a site and this must be one of the considerations in the detail of the nutrient balance calculation.

We therefore return to the request above for further information and advise reference to the WG Guidance Nutrient Budget Calculator Guidance.

We don't believe this needs to be unduly onerous, but we do seek a higher level of detail around the predicted effectiveness of treatment at component. We would reiterate that we are happy with the principles of the proposal and require this information to provide the certainty necessary under the conservation of Habitats and Species Regulations 2017 with regards effectiveness of the design and security of mitigation for the design life of the development.

Please do not hesitate to contact me if you wish to discuss anything further.

Kind regards,

Siôn M. Williams
Uwch Gynghorydd - Cynllunio Datblygu / Senior Advisor - Development Planning
Gwasanaeth Cynghori Cynllunio Datblygu / Development Planning Advisory Service
Fo/Fe / He/Him

Cymraeg

From: Tom Miles <tmiles@fi-rem.com>
Sent: 19 November 2025 12:59
To: Hughes, Kathryn <Kathryn.Hughes@cyfoethnaturiolcymru.gov.uk>
Cc: Joshua Rigby <josh.rigby@arthian.com>
Subject: RE: Land at Oak Road - NRW comment on nutrient neutrality

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Afternoon Kathryn,

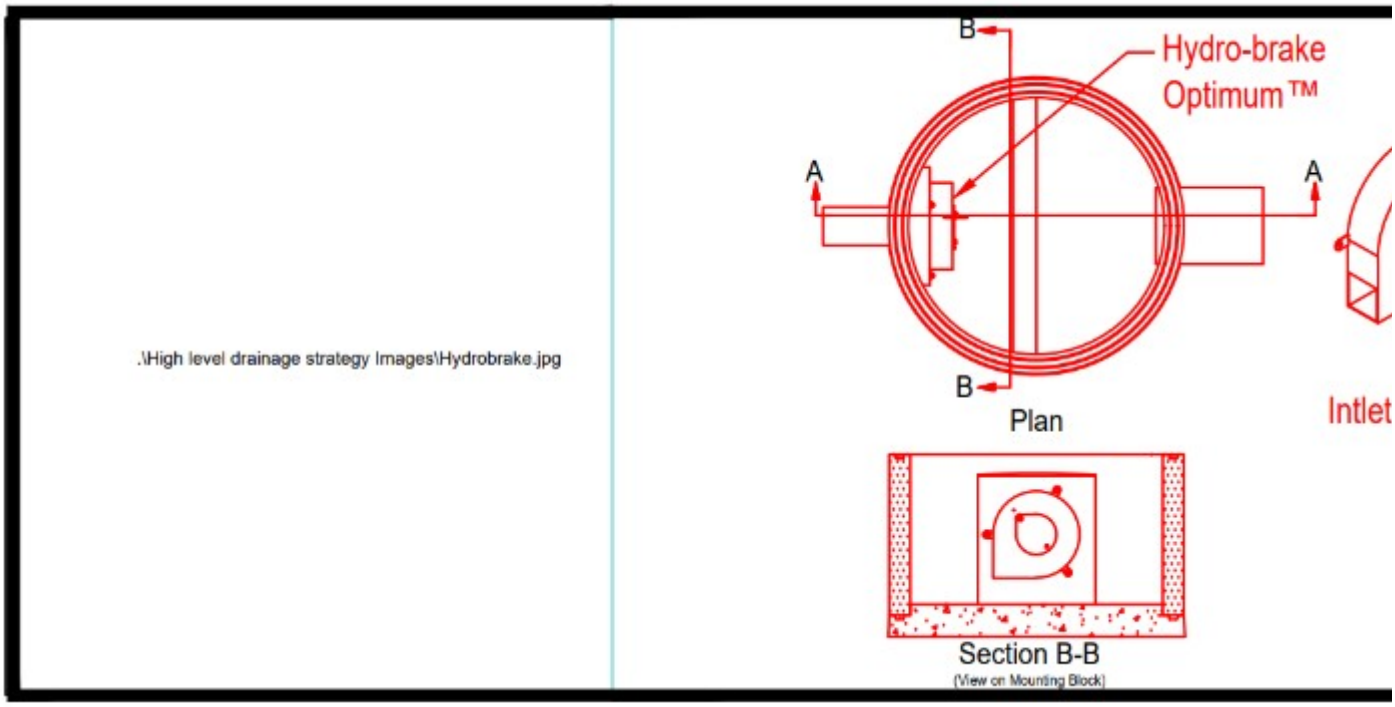
I've asked Josh to review the comments on Phosphate neutrality statement and provide a formal response on letterhead to address the points raised in detail.

The response on Phosphates is broadly positive but additional information required on exceedance flows.

Note on the return this point was listed under foul drainage. To clarify, foul for the site is connection into combined sewer to Southern edge of the scheme with lower flow rate. The surface water is effectively captured by a range of SuDs features on site including swales and rainwater gardens that all then lead on to a balancing pond that has been scoped to meet guidance of severe 1:100 year event with additional tolerance of 40% climate change storm event.

In the event of exceedance, there is overflow pipe shown below on the hydrobrake, that will prevent the balancing pond from topping.

The balancing pond has ability to store 2,143 litres on site which is compliant with guidance. In the event of 1:100 + 40% event the overflow pipe will be triggered but the water will have been through the swales at this point.



"We have reviewed the submitted Nutrient Neutrality Statement and note that it presents a strategy with supporting calculations indicating that nutrient neutrality may be achieved through use of a range of measures set out in the document. We welcome the overall approach to deliver nutrient neutrality using on-site mitigation opportunities for this development. The approach is largely reliant on the sustainable drainage (SuDS) scheme to provide the required level of mitigation. While an outline SuDS design has been presented, more detailed information should be provided to quantify how specific components of the scheme will deliver the required nutrient benefit. We provide the following comments on the Nutrient Neutrality Statement mitigation options:

- *Nutrient budget calculation - We welcome use of the Welsh Government (WG) calculator to determine nutrient impacts and note the phosphorus mitigation requirement of 2.6 kg Total Phosphorus/year determined from nutrient balance calculations.*

- *Method 1: Mitigation using land use – we recognise the importance of optimising land use to minimise nutrient loss and appreciate that proposed opportunities for further optimisation can help ensure the Stage 3 phosphorus load is the lowest practical value. We understand that the inclusion of this method is significant as it confirms both the scale of mitigation required and demonstrates that the necessary mitigation measures can be effectively delivered on site.*

- *Method 2: On-site SuDS Treatment – We note the general arrangement of the proposed SuDS scheme in the Drainage Plan Layout TOS-BML-XX-XX-DR-C-0500 and summary calculations indicating that the SuDS scheme would be able to deliver the required level of phosphorus mitigation. Stage 3S outputs from the nutrient calculator appear to be missing from Appendix C and as such no detail has been provided on the mitigation potential of specific components of the scheme design. We advise that detailed information on the phosphorus mitigation of the proposed scheme is provided. In particular, we would like to understand how exceedance flows have been considered in the nutrient balance calculations.*

- *Method 3: CSO Surcharge Storage / Benefit-in-Kind – we welcome any opportunity to either remove surface water from a combined sewer or undertake engineering work that reduces the frequency and duration of storm overflows. Nutrient benefits from such interventions should be appropriately accounted within nutrient balance calculations for a given site where they are delivered as part of, or in association with the proposed development. We note the indicative reduction in phosphorus losses that has been calculated.*

- *Method 4: On-Site Proprietary Treatment Technologies – while the potential of treatment technologies has been presented, no specific technology is currently being proposed and as such we assume they will not be included in the drainage scheme design.*

- *Method 5: Off-Site Nutrient Credit Purchase – similar to Method 4, while being considered as an option, we assume that focus will remain on methods 1 to 3 to deliver neutrality. "*

Does the above point provide sufficient additional detail to satisfy points in yellow highlight? If not, it would be useful to meet with water specialist to work through the build up. I'm available following dates and times;

- Monday 24th November
- Wednesday 26th November

Please let me know if these times are convenient.

Many thanks

Tom Miles **Senior Development Manager** MSc MRICS
E tmile@fi-rem.com T 01257 263 010 M 07775 036 551 W www.fi-rem.com

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From: Hughes, Kathryn <Kathryn.Hughes@cyfoethnaturiolcymru.gov.uk>
Sent: 18 November 2025 08:45
To: Tom Miles <tmiles@fi-rem.com>
Cc: Joshua Rigby <josh.rigby@arthian.com>
Subject: RE: Land at Oak Road - NRW comment on nutrient neutrality

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Thanks Tom,

Please could you advise, would our water specialist be needed at the meeting? Just wondered if you wanted any technical input?

Many Thanks,
Kath Hughes

From: Tom Miles <tmiles@fi-rem.com>
Sent: 17 November 2025 17:36
To: Hughes, Kathryn <Kathryn.Hughes@cyfoethnaturiolcymru.gov.uk>
Cc: Joshua Rigby <josh.rigby@arthian.com>
Subject: FW: Land at Oak Road - NRW comment on nutrient neutrality

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Good afternoon Kathryn,

Thanks for getting in touch and progressing the return.

Toby at UES will contact Matt Ellis at NRW direct regarding proposed newt licence.

On the Phosphates point and exceedance flows, it might make sense to have a quick call with our flood engineer to walk through. Have you got any availability this week to run through and I'll set up a call?

All other amends and suggested drafting will be addressed. We also have no issue with the draft conditions.

Many thanks

Tom Miles Senior Development Manager MSc MRICS
E tmile@fi-rem.com T 01257 263 010 M 07775 036 551 W www.fi-rem.com

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From: Hughes, Kathryn <Kathryn.Hughes@cyfoethnaturiolcymru.gov.uk>
Sent: 12 November 2025 16:36
To: Tom Miles <tmiles@fi-rem.com>
Subject: Land at Oak Road - NRW comment on nutrient neutrality

Caution: This email has originated from outside the organisation. Do not click any links or open attachments unless you recognise the sender.

Dear Tom,

Hope you are well.

Apologies, I've just checked and realise we didn't cc you into our response to the LPA regarding Land at Oak Road, with particular regard to the nutrient neutrality assessment.

I have now attached a PDF of our response and pasted the relevant comments below for ease. This response is also on the LPA website for Wrexham: P/2025/0430

If you have any further questions please feel free to get in touch using the mobile number below which will come straight through to me

Apologies again,

Best Wishes,
Kath Hughes

- Foul Drainage

We have reviewed the submitted Nutrient Neutrality Statement and note that it presents a strategy with supporting calculations indicating that nutrient neutrality may be achieved through use of a range of measures set out in the document. We welcome the overall approach to deliver nutrient neutrality using on-site mitigation opportunities for this development. The approach is largely reliant on the sustainable drainage (SuDS) scheme to provide the required level of mitigation. While an outline SuDS design has been presented, more detailed information should be provided to quantify how specific components of the scheme will deliver the required nutrient benefit. We provide the following comments on the Nutrient Neutrality Statement mitigation options:

• Nutrient budget calculation - We welcome use of the Welsh Government (WG) calculator to determine nutrient impacts and note the phosphorus mitigation requirement of 2.6 kg Total Phosphorus/year determined from nutrient balance calculations.

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• Method 2: On-site SuDS Treatment – We note the general arrangement of the proposed SuDS scheme in the Drainage Plan Layout TOS-BML-XX-XX-DR-C-0500 and summary calculations indicating that the SuDS scheme would be able to deliver the required level of phosphorus mitigation. Stage 3S outputs from the nutrient calculator appear to be missing from Appendix C and as such no detail has been provided on the mitigation potential of specific components of the scheme design. We advise that detailed information on the phosphorus mitigation of the proposed scheme is provided. In particular, we would like to understand how exceedance flows have been considered in the nutrient balance calculations.

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• Method 5: Off-Site Nutrient Credit Purchase – similar to Method 4, while being considered as an option, we assume that focus will remain on methods 1 to 3 to deliver neutrality.

Dr Kathryn Hughes
Arweinydd Tim Cynllunio Datblygu / Development Planning Team Leader
Gwasanaeth Cynghori Cynllunio Datblygu / Development Planning Advisory Service
Yn Ardystiedig o ran Llythrennedd Carbon / Certified Carbon Literate
Rhif Ffôn / Phone number**: 07929 786 795**
Hi/Ei / She/Her

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.
Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Cyfoeth Naturiol Cymru
Natural Resources Wales