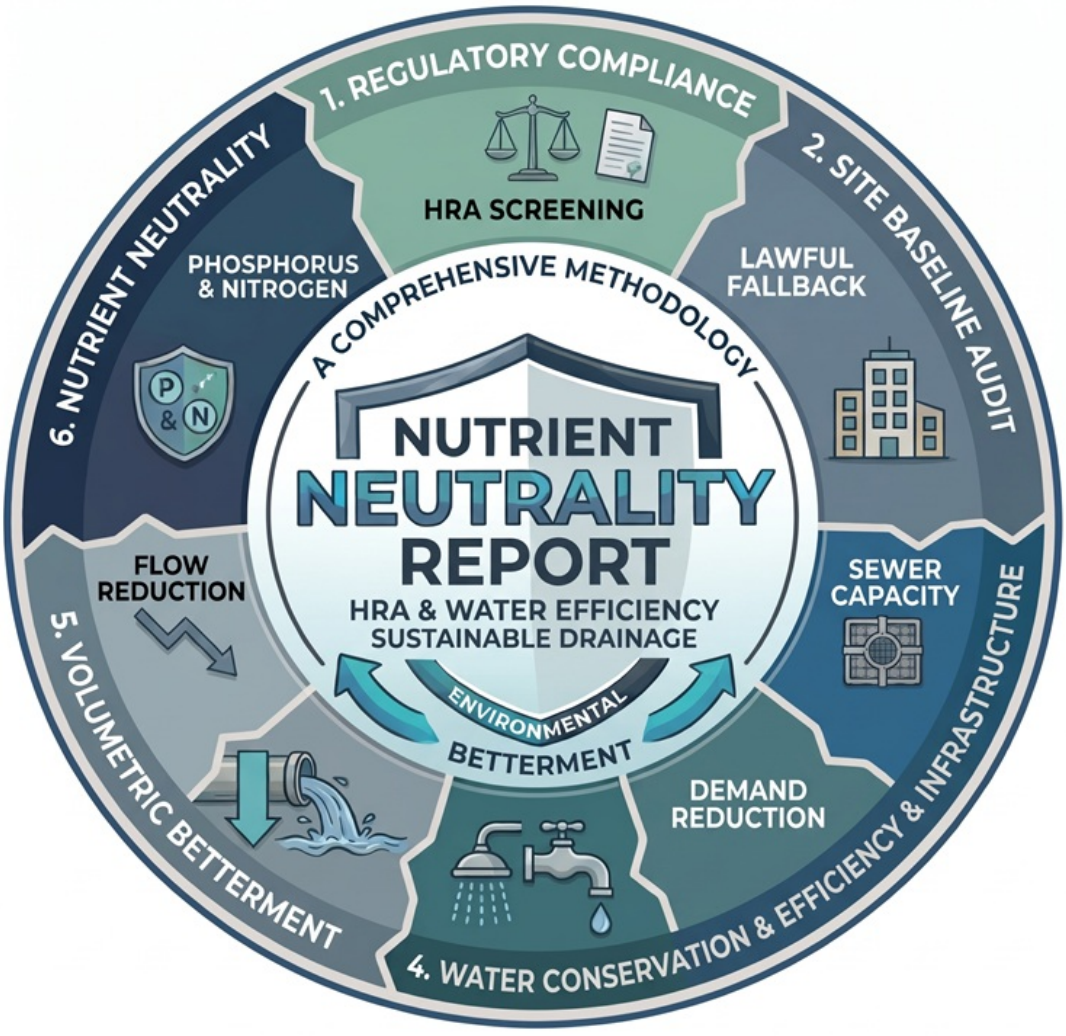
PROPOSED PART CHANGE OF USE
OF THE EXISTING UPPER 1ST, 2ND & 3RD FLOORS FROM OFFICES (USE CLASS B1)
TO 36 x 1 BED 1 PERSON MANAGED STUDENT ACCOMMODATION

Regent House, Regent Street, Wrexham LL11 1PR

Nutrient Neutrality Assessment

07 / 10 / 2026 REV: **-**

Planning Application P/2026/0543



Osborne House

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5. Proposed Development Assessment
6. Volumetric/Nutrient Comparison and Conclusions

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Introduction & Purpose

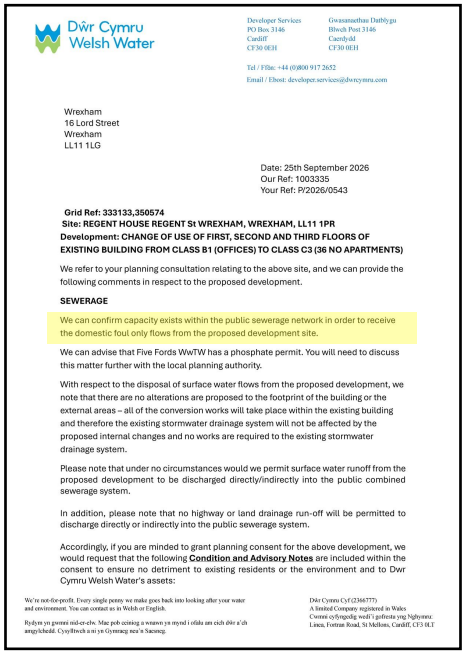
This Statement has been prepared on behalf of the Applicant to provide Wrexham County Borough Council Planning Authority and Natural Resources Wales (NRW) with the required Habitats Regulations Assessment (HRA) evidence to demonstrate Nutrient Neutrality for this proposed conversion at Regent House.

In correspondence dated 16 September 2026, the Planning Officer indicated that determination of applications within the River Dee Special Area of Conservation (SAC) catchment is currently delayed where development would result in an increase in foul drainage flows and nutrient inputs, **unless nutrient neutrality can be demonstrated.**

This statement demonstrates that when evaluating the existing lawful office use baseline against the proposed conversion using British Water "Flows and Loads" standards, the proposed development delivers an overall reduction in total daily foul volume and total phosphorus (P) discharge, **therefore the proposed scheme achieves nutrient neutrality**.

Furthermore the formal consultation response from Dwr Cymru Welsh Water (DCWW) dated 25 September 2026 confirms:

- **Capacity exists within the public sewerage network to receive domestic foul-only flows from the proposed development site.**
- Foul flows from the site drain to Five Fords Wastewater Treatment Works (WwTW), which has a phosphorus permit.
- No alterations are proposed to the footprint of the building or external impermeable areas, meaning existing surface water arrangements remain unaffected (satisfying DCWW Condition 1).



Dŵr Cymru Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Tel / Ffôn: +44 (0)800 917 2652
Email / Ebost: developer.services@dwrcymru.com

Wrexham
16 Lord Street
Wrexham
LL11 1LG

Date: 25th September 2026
Our Ref: 1003335
Your Ref: P/2026/0543

Grid Ref: 333133,350574
Site: REGENT HOUSE REGENT St WREXHAM, WREXHAM, LL11 1PR
Development: CHANGE OF USE OF FIRST, SECOND AND THIRD FLOORS OF EXISTING BUILDING FROM CLASS B1 (OFFICES) TO CLASS C3 (36 NO APARTMENTS)

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

SEWERAGE

We can confirm capacity exists within the public sewerage network in order to receive the domestic foul only flows from the proposed development site.

We can advise that Five Fords WwTW has a phosphate permit. You will need to discuss this matter further with the local planning authority.

With respect to the disposal of surface water flows from the proposed development, we note that there are no alterations are proposed to the footprint of the building or the external areas – all of the conversion works will take place within the existing building and therefore the existing stormwater drainage system will not be affected by the proposed internal changes and no works are required to the existing stormwater drainage system.

Please note that under no circumstances would we permit surface water runoff from the proposed development to be discharged directly/indirectly into the public combined sewerage system.

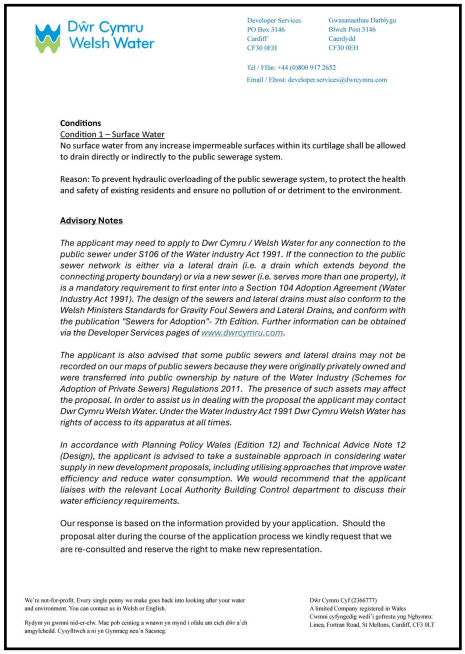
In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

Accordingly, if you are minded to grant planning consent for the above development, we would request that the following **Condition and Advisory Notes** are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

We're not-for-profit. Every single penny we make goes back into looking after your water and environment. You can contact us in Welsh or English.

Rydym yn gwmni nid-er-elw. Mae pob ceiniog a wnawn yn mynd i ofalu am eich dŵr a'ch amgylchedd. Cysylltwch a ni yn Gymraeg neu'n Saesneg.

Dŵr Cymru Cyf (2366777)
A limited Company registered in Wales
Cwmni cyfyngedig wedi'i gofrestru yng Nghymru
Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT



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Conditions
Condition 1 – Surface Water
No surface water from any increase impermeable surfaces within its curtilage shall be allowed to drain directly or indirectly to the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

Advisory Notes

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

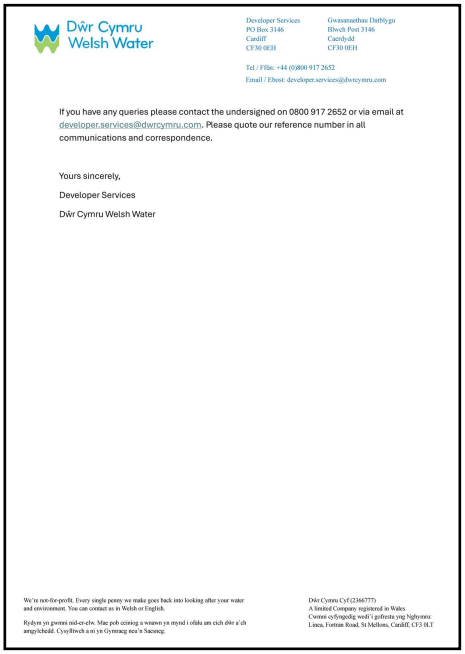
In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption. We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

We're not-for-profit. Every single penny we make goes back into looking after your water and environment. You can contact us in Welsh or English.

Rydym yn gwmni nid-er-elw. Mae pob ceiniog a wnawn yn mynd i ofalu am eich dŵr a'ch amgylchedd. Cysylltwch a ni yn Gymraeg neu'n Saesneg.

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If you have any queries please contact the undersigned on 0800 917 2652 or via email at developer.services@dwrcymru.com. Please quote our reference number in all communications and correspondence.

Yours sincerely,

Developer Services

Dŵr Cymru Welsh Water

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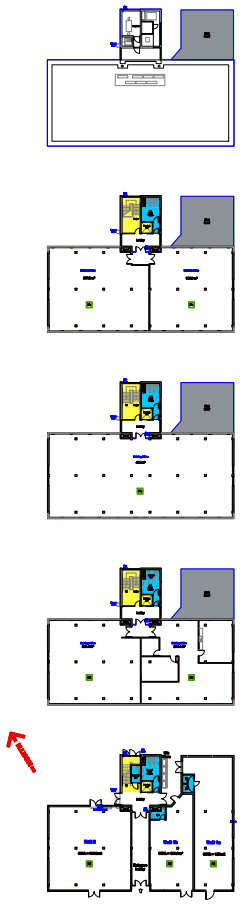
Baseline Assessment (Existing Lawful B1 Office Use)

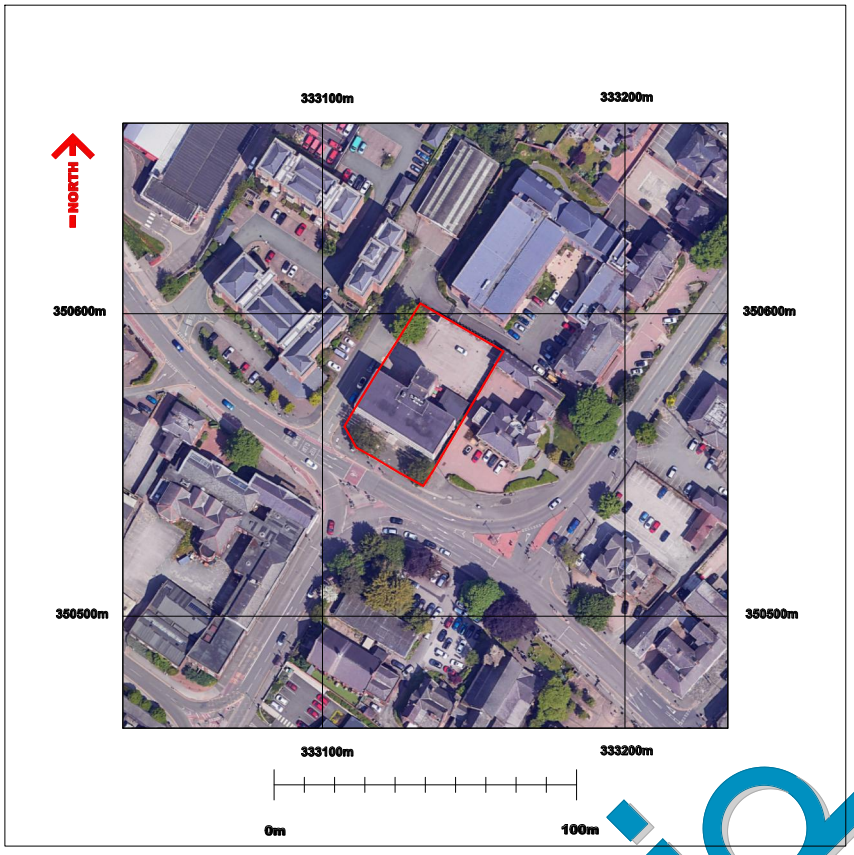
- **Physical Extent:** First, second, and third floors of Regent House, comprising 410m2 of office space per floor (excluding circulation, staircases, toilets and service areas), providing a cumulative gross floor area of 1,230m2 of existing Class B1 office space.
- **Existing Ceiling Heights:** 2.7 metres.
- **Statutory Capacity (Regulation 10):** Under Regulation 10 and Approved Code of Practice (ACOP) L24 of the Workplace (Health, Safety and Welfare) Regulations 1992, each room requires a minimum volume of 11m3 per worker (discounting room heights over 3.0m). At a clear height of 2.7m, the minimum floor area per person is 4.07m2, providing a theoretical statutory baseline capacity of 100 workers per floor, or 300 office workers across all three floors.
- **Operational Sanitary Baseline (Regulation 20):** Based on the physical welfare core (3 WC cubicles and 3 washbasins per floor), Table 1 of ACOP L24 confirms this sanitary provision accommodates a compliant baseline population of 50 persons per floor, or 150 workers across the three floors.
- **Flows and Loads Benchmark:** Under Water Flows and Loads (Code of Practice for non-residential offices without a canteen), foul drainage discharge is benchmarked at 50 litres per worker per day.

Baseline Foul Calculation: **150 workers x 50 L/worker/day = 7,500 L/day**

(Note: Under the full empty-room statutory capacity of Regulation 10 for 300 workers, lawful flow would equate to 300 workers x 50 L/day = 15,000 L/day. For a robust and conservative assessment, **the 150-worker sanitary baseline of 7,500 L/day has been adopted for this report.**)

Existing Floor Plans





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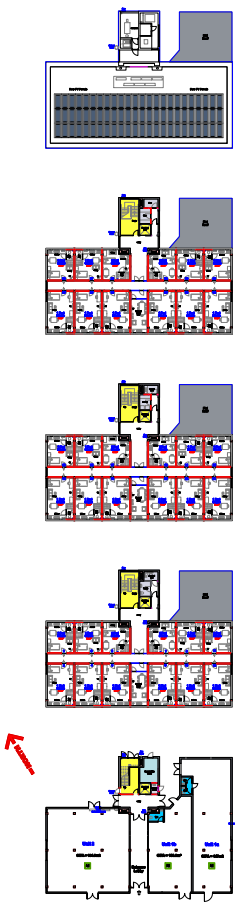
Proposed Development Assessment

- **Occupancy Density:** Using the Habitats Regulations Assessments (HRA) and Natural Resources Wales (NRW) guidance and applying the standard rate of 1 person per studio yields: 36 units x 1 persons = 36 persons.
- **Domestic Effluent Benchmarks:** Standard British Water Flows and Loads domestic rate: 150 litres per person per day.
- **Water-efficient domestic rate under Building Regulations Part G:** 120 litres per person per day.

Proposed Foul Calculations:

- **Standard Rate: 36 persons x 150 L/person/day = 5,400 L/day**
- **Part G Compliant Rate: 36 persons x 120 L/person/day = 4,320 L/day**

Proposed Floor Plans





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Volumetric/Nutrient Comparison and Conclusion

Foul effluent from both the existing commercial use and the proposed conversion would discharge to the public sewer network and is treated at Five Fords WwTW, the total nutrient load discharged to the River Dee SAC is directly governed by effluent volume generated by the site.

Summary Comparison:

- Existing Office Baseline (150 Workers) = Total Flow: **7,500 L/day**
- Proposed (36 Persons at Standard Rate of 150 L/day) = Total Flow: **5,400 L/day**
- **Net Difference: -2,100** L/day (a reduction of **-28%**)
- Proposed (36 Persons at Bregs Part G Rate of 120 L/day) = Total Flow: **4,320 L/day**
- **Net Difference: -3,180** L/day (a reduction of **-42.4%**)

Phosphorus Impact at Five Fords WwTW:

- The proposed conversion would generate a **significant net reduction** entering the public system.
- Because Five Fords WwTW strips phosphorus to an established environmental permit standard before discharging into the receiving watercourse, the net reduction in effluent volume from the proposal would result in an absolute reduction in total annual phosphorus output (kg P/year) into the River Dee SAC catchment.
- The proposed conversion therefore would deliver an environmental benefit over the existing office use.

CONCLUSION:-

- **NRW Guidance Compliance:** Under the Conservation of Habitats and Species Regulations 2017, proposed developments that produce no net increase in nutrient loading over lawful baseline levels achieve nutrient neutrality.
- **DCWW Consultation:** Dwr Cymru Welsh Water has verified network capacity and confirmed treatment at Five Fords WwTW, while also noting that surface water run-off remains as existing.
- **Assessment Outcome:** The proposed conversion would result in an overall volumetric decrease in foul effluent of between **28% and 42.4%** against the existing lawful baseline and therefore **demonstrates nutrient neutrality and also a significant net reduction**.

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