Ein cyf/Our ref: CAS-310836-G6S2
Eich cyf/Your ref: P/2026/0322

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 25 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Alterations and enlargement of existing bar and club house including roof terrace and roof link to changing facilities.

Lleoliad/Location: Gwersyllt cricket club, Bradley and Gwersyllt sports club, park wall road, Bradley, Wrexham, LL11 4DX.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about

We have **concerns** with the application as submitted. To overcome these concerns, further consideration is required regarding **foul drainage**.

We also advise that based on the information submitted to date, a **condition** regarding **land contamination** should be attached to any planning permission granted:

Condition 1: Land Contamination

Without the inclusion of this condition we would object to this planning application.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation, under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments.

This application for alterations and enlargement of an existing bar and club house proposes connection of foul water to the mains sewer. The proposed development could potentially lead to an increase of phosphorus load from the receiving wastewater treatment works into the River Dee and Bala Lake SAC. The majority of the River Dee and Bala Lake catchment is currently failing to meet water quality targets for phosphorus. The nutrient

impacts of new connections need to be considered on a case-by-case basis within the Habitats Regulations Assessment process.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. We advise your Authority that further consideration is required and to follow our Advice specifically the sections titled 'What development proposals are unlikely to increase nutrient levels within a river SAC?' and 'What does this mean for development proposals involving connection to public wastewater treatment works?'

We therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you conclude that an Appropriate Assessment is required, the Applicant will need to provide whatever evidence they consider appropriate (seeking advice from consultants as necessary) to demonstrate no adverse effect on site integrity.

Please consult us on any Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). However, until the development can demonstrate it will not lead to an increase of phosphorus load from the receiving wastewater treatment works into the river we would be unable to advise you that the proposed development would not result in an adverse effect on the integrity of the site.

Land Contamination

We note the application site lies within the footprint of a historic landfill site (Gwersyllt Park) and therefore has the potential for contamination to be present. Based on the information provided, we recommend the Local Authority attach the following condition to any permission granted:

Condition 1: Unsuspected contamination

If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification:

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to the water environment, and to ensure that the development can be carried out safely without unacceptable risks.

Other matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

John Littlemore

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: neplanning@cyfoethnaturiolcymru.gov.uk

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.