Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-311395-W3X1
Eich cyf/Your ref: P/2026/0321

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 23 July 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Construction of outdoor covered cricket facility, entrance building and associated parking and 2 no artificial wickets

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 the above, which we received on 17 June 2026.

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, the following **condition** should be attached to any planning permission granted:

- **Condition: Land Contamination**

Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

Protected Sites (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 construction of an outdoor covered cricket facility, entrance building and associated parking and 2 no artificial wickets 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.

We note the following documents submitted in support of this application:

- Foul Drainage and Nutrient Impact Statement

Section 5 advises the development represents an increase of 8 toilets and section 6 advises the development will use the existing public sewer connection to discharge foul waters.

However, the statement does not provide sufficient information to exclude the possibility of an increase in nutrient loading to the River Dee and Bala Lake SAC i.e. nutrient neutrality. No nutrient budget calculations have been provided, and we advise that flows which enter the public sewer is not sufficient evidence to conclude no likely significant effect on SAC integrity.

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 section titled “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

According to our records the proposed development site is located within land that is, or has been, used for the deposition of waste material (HLD Ref: EAHLD14267). We would therefore advise you to consult with the local authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site so that they can decide whether or not to make their own investigations into the presence of landfill gas.

Moreover, based on the information provided, we recommend the following condition be attached to any planning permission granted.

Condition 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.

Protected Species

We note that the information submitted in support of the above application (Preliminary Ecological Appraisal prepared by Arbtech at Gwersyllt Park Cricket Club dated 20 March 2026) has identified that bats and great crested newt are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

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,

Shaun Thomas

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.