Ein cyf/Our ref: CAS-313493-W4H0
Eich cyf/Your ref: P/2026/0364

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 05 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Erection of building for use as sports training pavilion (D2 - assembly leisure)

Lleoliad/Location: Colliers Park Wrexham AFC Training Ground, Chester Road, Gresford, Wrexham, LL12 8PW

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 10 July 2026.

We have **concerns** with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding **foul drainage**. If this information is not provided, we would object to this planning application. Further details are provided below.

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. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note from the information submitted that a new private drainage system is to be installed to provide foul drainage for the proposed sports pavilion. As such, we refer you to our Advice and advise you to seek further information from the applicant.

The application indicates the use of a packaged treatment plant (PTP) to manage the foul water drainage and would discharge to an existing soakaway located to the northeast of the site, adjacent to the site entrance.

According to our records, the proposed development is located within a publicly sewered area. The installation of private sewage treatment facilities within publicly sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems.

Section 6.6.21 of Planning Policy Wales states 'Any development discharging domestic sewage should connect to the foul sewer where it is reasonable to do so. Development proposing the use of non-mains drainage schemes will only be considered acceptable where connection to the main sewer is not feasible...'

We note that page 14 of the pre-Application Consultation Report (Colliers Park, Gresford, dated June 2026, Savills) references a previous development utilising a private drainage system and states:

> "Further consideration has been given to viability of discharging to the existing drains located within the Premier Inn grounds to the south, however this is not considered to be feasible due to the crossing of third-party land, disruption to existing built form and constraints from the existing hedgerow and tree lines."

Government guidance on private sewerage in Welsh Government circular 008/2018 stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

We therefore advise that further information regarding the potential costs of connecting to mains in comparison to the installation of a PTP and associated drainage fields should be submitted prior to any further consideration of non-mains disposal. Please note a permit would also be needed for such a system within a sewered area and the above information would also be required to determine such a consent.

Connection to the public foul sewer remains the preferred option. If the applicant can demonstrate, through the submission of sufficient supporting information including cost evidence, that connection to the public sewer is not feasible, a private foul drainage system may be considered. In that case, the following advice should be taken into consideration and the additional information detailed below should also be submitted in support of the application.

Section 3.8 of the Phosphate Statement (WAFC – Sports Pavillion, Colliers Park, version 2.0, dated June 2026, Savills) states that:

> "…the proposals do not introduce an increase in player or staff numbers, nor do they expand the overall scale or frequency of training activities beyond what is already established across 2 sites. Instead, the development consolidates existing operations into a single site. Any additional on-site facilities, such as changing or welfare provision, are offset by the cessation of equivalent activities at STōK Cae Ras."

While there is a clear presentation of only an ‘exchange’ of nutrients (on balance), the means of securing this is not presented by the applicant.

Section 6 of the Flood Consequences Assessment and Drainage Strategy (Colliers Park, Wrexham AFC, dated April 2026, Avie Consulting Ltd) states that the foul drainage will be “to the southwest of the building via a packaged treatment plant and ultimately discharging to ground in a trench located next to the football pitch.”

Drawing P4920-01, Revision C dated 01/05/2026 (Avie Consulting Ltd) shows the proposed PTP and a discharge to a chamber to the southwest of the building, however the trench referenced in the FCA and Drainage Strategy is not shown. Further information to confirm a connection from the chamber to a drainage trench, including site plans should be submitted in support of the application.

The effectiveness of the proposed treatment and discharge to ground requires further evidence to demonstrate that it would not result in any additional phosphorus entering the SAC. Sufficient information is needed to provide certainty that the private treatment system would operate effectively and reliably and would not lead to an increase in phosphorus loading.

While the level of treatment provided by a wastewater treatment works (WwTW) compared with that of the proposed private drainage system will be relevant to any phosphorus balance calculations, the respective discharge locations would also need to be considered. In particular, any assessment would need to take account of the different pathways by which phosphorus may reach the SAC, including the location of WwTW discharges and the potential for phosphorus from the private drainage system to enter the SAC via ground pathways from the development site.

We therefore advise you to seek further information as identified in the section titled “What does this mean for development proposals involving private sewage treatment systems” and “What does this mean for development proposals involving connection to public wastewater treatment works?” of that Advice.

The following further information should be submitted in relation to the proposed foul drainage arrangements:

- Clarification on whether the nutrients would be considered existing foul flows and loads, from residents of the same SAC catchment or;
- Clarification on whether the nutrients would be considered existing foul flows and loads, from an existing lawful activity in the same SAC catchment, where that existing use could be permanently retired in a secure manner within a planning or legal agreement (such that it could not be double counted);
- Further details regarding the whether the treatment is to an appropriate level by the proposed private drainage, and that the land capacity is suitable to ensure no additional Phosphorus loading to the nutrient sensitive SAC from those discharges to ground, taking into consideration of other discharges in the vicinity;
- Clarification on the discharge destination – location and whether this is to ground or watercourse.

Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine. 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 determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

Contaminated Land

We have reviewed the following documents submitted in support of the application:

- Phase II Geo-Environmental Assessment Report, JL/C6579/15586, Rev A dated July 2026 – Part 1
- Email dated 10/07/2026 from Annabelle Miller to Local Planning Authority
- Geotechnical Letter Report (Brownfield Solutions, JL/C6579/15383 Rev A, dated 31/03/2026)

The application site is located over the Pont-Y-Capel historic landfill and overlies a Secondary A aquifer.

We note that a specific Phase 1 report has not been submitted in support of the application, and the cover email dated 10 July 2026 provides insufficient information to explain the initial conceptual site model, preliminary risk assessment, or the rationale for the site investigation and sampling strategy.

However, we note from your Land Contamination Officer's consultation response dated 27 July 2026 that the historic landfill is classified as inert material and therefore no concerns have been raised in relation to land contamination.

Given that the controlled waters at this site are not of the highest environmental sensitivity, we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the Land Contamination Risk Management (LCRM) guidance should be followed.

These comments are based on our assumption that gross contamination is not present at this location. If, during site investigation or development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales.

Protected Species

No ecological information has been submitted in support of this application, however section 3.0 of the Planning, Design and Access Statement (dated June 2026, Savills) states that "The site is considered to be of little ecological value given its current land use, which is well maintained and predominantly comprises sealed surface…"

We note that there are records of great crested newts approximately 200m from the application site and common pipistrelle bats 125m from the application site. We recommend you seek the advice of your Authority's internal ecological advisor about the requirement for further information to be submitted in support of the application, the need for bespoke surveys, and the scope of further information, where required.

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,

Rachael Burke

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.