WAFC – Sports Training Pavilion, Colliers Park

Phosphorus Statement

Date of report: June 2026

PREPARED FOR

Wrexham AFC

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Document History

Issue	Date	Issued by	Comment
1.0	27/05/2026		Draft
2.0	05/05/2026		Final

1. Introduction

1.1 This Phosphorus Statement ("Statement") has been prepared by Savills ("the Agent") on behalf of Wrexham Association Football Club ("Wrexham AFC" or "the Club") in respect of the Sports Training Pavilion development at the Football Association Wales ("FAW") Colliers Park Training Ground in Gresford, Wrexham, LL 12 8PW ("the Site") .

1.2 This Statement supports a full planning application involving the construction of a Sports Training Pavilion at Colliers Park, Gresford in accordance with the requirements of Chapter six of Planning Policy Wales (Edition 12).

1.3 The description of development is as follows:

"The construction of a new Sports Training Pavilion with supporting infrastructure and associated works."

1.4 This Statement demonstrates the neutral phosphorus implications of the proposed development at Colliers Park, Gresford.

2. Policy Context

2.1 This statement has been prepared to support a planning application within the catchment area of the River Dee and Bala Lake Special Area of Conservation (SAC).

Habitats Regulations

2.2 The proposed development falls under the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitats Regulations").

2.3 Under Regulation 63, where a project is likely to have a significant effect on a European site (including SACs), the competent authority must undertake a Habitats Regulations Assessment (HRA).

2.4 The Local Planning Authority (LPA), as the competent authority, must be satisfied that the proposal will not adversely affect the integrity of the SAC, either alone or in combination with other plans or projects.

Natural Resource Wales (NRW) Guidance

2.5 Natural Resources Wales has issued specific guidance for developments affecting SAC rivers in Wales, including:

- Advice to Planning Authorities for Planning Applications affecting Nutrient Sensitive SACs
- Principles of Nutrient Neutrality

2.6 Application for planning permissions or Environmental Permits for a water discharge will need to demonstrate that their proposals are nutrient neutral where they could increase:

- the amount of phosphorus in a river SAC where water quality targets are already being exceeded, or are failing to meet the targets downstream
- the amount of nitrogen in a specified water body of a marine SAC, or it's upstream freshwater catchment, and has one or more features in unfavourable condition for dissolved inorganic nitrogen (DIN) and an associated ecological response.

2.7 The nutrient impact of a development will be reviewed in the Appropriate Assessment stage of an HRA for a planning or water discharge environmental permit application. Demonstrating nutrient neutrality is a recognised approach to show that a development will not have an adverse impact.

3. Analysis

3.1 This statement has been prepared following the NRW 'Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation' Version 5.1.

3.2 The proposals are explained fully in the Planning, Design and Access Statement and other supporting documents that have been submitted with the application but an overview of the Club's operations and the proposed foul drainage solution is provided here.

Wrexham AFC Team Operations

Existing Operations

3.3 At present the Club's training operations are split across two locations: the STōK Cae Ras Stadium and Colliers Park training ground. The existing daily routine requires players to report to the Stadium training facility in the morning for pre-training recovery and gym-based preparation as required before changing into training kit and travelling to the Colliers Park training ground. The Club does not access the changing facilities or utilise the welfare facilities provided on Site at Colliers Park as these are a Football Association of Wales facility).

3.4 The Club currently maintains a dedicated on-site storage unit at the Colliers Park training ground for the equipment required for daily sessions. Once training has concluded, players return to the STōK Cae Ras Stadium for post-training activities and commitments using the facilities currently provided at the Stadium.

Proposed Operations

3.5 The Sports Training Pavilion therefore seeks to consolidate the Club's existing multi-site operations within the Colliers Park training ground, reducing the need for players to split activity between multiple sites. The Sports Training Pavilion would allow for all pre-training, training, and post-training function undertaken at the Stadium to be relocated to Colliers Park. The Sports Training Pavilion would provide the appropriate accommodation and support spaces to enable a self-contained training environment on a single site. Furthermore, this would significantly reduce the movement of players between multiple locations during the training day, improving the operational efficiency and as a result significantly limit vehicle trips. The Site does not fall within an area designated for its ecological importance.

3.6 The facility will be used exclusively by players and associated staff who already commute regularly between the STōK Cae Ras and Colliers Park for training.

Foul Drainage

3.7 In terms of foul drainage, the scheme includes a Tricel Sewage Treatment Plant Tank which connects to the existing chamber on Site therefore offload into public sewers will not be increased.

Impacts

3.8 In terms of phosphate impacts, 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. Therefore, there is no net increase in wastewater generation associated with the Club's operations.

3.9 The NRW guidance states that every development should be considered by Planning Authorities on a case-by-case basis. It further states that the following developments can be screened out as not

likely to have a significant effect on a river SAC in relation to nutrient inputs, as there is unlikely to be a source of additional nutrients or pathway for impacts:

- Any development that does not increase the volume and concentration of nutrients in wastewater.

3.10 This applies to the application in question given purpose of the application is to consolidate existing activities which already take place in the area.

4. Conclusion

4.1 The proposed development does not give rise to an increase in phosphate loading. It represents the consolidation of existing operations within the area, with no net change in usage intensity or wastewater generation (ie the multi-sites and the single site are all in the same relevant catchment). Foul water at the site will be dealt with via a sewage treatment system. Accordingly, the proposals can be considered neutral in respect of phosphate impacts.

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