Ein cyf/Our ref: CAS-316788-T7T7
Eich cyf/Your ref: P/2026/0364

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 04 September 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 additional information on the above, which we received on 21 August 2026.

We continue to 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.

Proposed foul drainage system in a sewered area

Additional information has been submitted (Wrexham AFC Colliers Park 1st Team Training Facility – Foul Drainage Response 19 Aug 2026) in relation to providing justification for a private foul drainage system within a mains sewered area. We consider that the information provided could demonstrate that a connection to mains sewer is not feasible

due to the costs and practicability, however it is for the local planning authority (LPA) to determine the acceptability of the justification provided in planning terms. We also advise that this information is submitted in support of a permit application (please see Advice to developer below). It is important to note that a grant of planning permission does not guarantee that a permit will be granted.

Private foul drainage system details

Notwithstanding the above, we continue to have concerns regarding the proposed foul drainage arrangements and advise that you seek further information from the applicant as identified in our online advice Natural Resources Wales / Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation in the section titled 'What does this mean for development proposals involving private sewage treatment systems'.

The updated drawing 'Foul and Surface Water Drainage Layout, reference P4920-01, revision F' (dated 18/08/2026) states the following:

> "Treated foul flows to discharge to existing soakaway system adjacent 3G synthetic pitch via 225⌀ carrier drain. Soakaway system is located approximately 100m to the north east of the new modular building."

While the location of the private treatment plant has been included, the location of the soakaway has not been confirmed on the drawing, and should be shown.

To summarise, we advise, that the following information in relation to the proposed system should be provided:

- Percolation test results to demonstrate that the existing soakaway has appropriate infiltration rates.
- Location of the soakaway shown on a drawing, including the dimensions and capacity of the soakaway.
- Confirmation that the system will be built to the relevant British Standard (BS 6297:2007+A1:2008).
- The maximum daily discharge rate.

Nutrients input

In relation to our concerns as to whether the nutrient inputs can be regarded as arising from an existing lawful activity within the same SAC catchment, the Foul Drainage Response (dated 19 August 2026) states:

> "… the application simply moves a proportion of foul flow (phosphate-producing) activity from one location in the catchment to another by essentially the same people…"
>
> "The same numbers of players and staff will carry out the activities at the same regularity but will this will almost exclusively be at Colliers Park (if any residual training activity takes place at Cae Ras in the future it will automatically offset any activity that would otherwise have been undertaken at Colliers Park)."

Therefore, representing a “no nett change” situation. This is also referenced in section 3.8 of the Phosphate Statement (WAFC – Sports Pavillion, Colliers Park, version 2.0, dated June 2026, Savills) which 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.”

We continue to advise that, although the submission presents what is effectively a nutrient exchange (on balance) within the same catchment with no net increase in nutrient loading, the applicant has not demonstrated how this arrangement would be secured in practice. This matter should therefore be given further consideration by your Authority.

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.

Advice to developer

Applicants wishing to operate a private sewerage system will need either to apply to us for an environmental permit or register with us for an exemption from the permit requirement. Septic tanks and small sewage treatment works that meet certain criteria may be registered as exempt.

A step by step guide to registering an exemption is explained further at Natural Resources Wales / Register your septic tank or small sewage (package) treatment plant.

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found on our website Natural Resources Wales / Apply for a permit to discharge domestic sewage. Should a permit be required, further information may be needed as part of that application process. The Applicant is therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted, and the permit requirements. Further details on how to access our pre-application advice service can be found on our website Natural Resources Wales / Pre application advice for environmental permits.

It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable at the permitting stage, either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. Applicants are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site.

Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to guidance-for-pollution-prevention-4-2022-update.pdf on the NetRegs website, which provides further information.

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 also note the comments from your Land Contamination Officer dated 27 July 2026, which state that the historic landfill comprises of inert material and raise no concerns in relation to land contamination.

In light of this, and 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.