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COUNTY BOROUGH COUNCIL
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Eich Cyf/Your Ref: P/2024/1410
Ein Cyf/Our ref: SAB/FUL/2023/0803
Dyddiad/Date: 10/10/2024
Gofynner am/Ask for: Cathryn Hughes
Rhif Cyswllt/Contact No: 01978 729639
E-bost/E-mail: flooding@wrexham.gov.uk

Dear Emma,

Site Address: LAND TO THE SOUTH OF ROSSETT ROAD AND NORTH OF HARWOODS LANE, ROSSETT, WREXHAM, LL12 0HB
Site Description: Formation of vehicular access (Harwoods Lane) and relocation of surface water pump station (previously approved under planning permission P/2021/0110)

Thank you for consulting the Lead Local Flood Authority in regards to this application. At this time, the LLFA Team would like to **OBJECT** to these proposals. This is because the proposals have not adequately considered the flood risk posed to the access on Harwoods Lane and parts of the proposal contravene the SuDS Approving Body (SAB) Approval issued by the LLFA.

SuDS Approving Body (SAB)
The Welsh Government enacted Schedule 3 of the Flood and Water Management Act 2010 on 7th January 2019. As such, the LLFA Team became a SuDS Approving Body (SAB) with the responsibility of technically evaluating and approving all surface water drainage systems for one or more dwellings or where the construction area exceeds 100 m^2. We note that the developer for the wider site is in receipt of full SAB approval as of 17/01/2024 under the reference SAB/FUL/2023/0803 with the pumping station in the original orientation. We note that any changes to the surface water system and to the extent of the impermeable area should also receive the approval of the SAB via an amendment. The LLFA notes that it is yet to receive an application for such an amendment to be made.

Despite the above SAB approval, we do have concerns about the proposals shown by this planning application. Whilst we do not have any objections in principle to the turning of the pumping station by 180°, we do note some issues with the landscaping surrounding the new pumping station as shown on the Drainage Plan. We note that the Landscaping Plan demonstrates a different planting regime to the Drainage Plan. We would like some clarity on which of these planting schemes is proposed for use on the site. The tree planting shown on the drainage plan would be inappropriate as trees are proposed to be planted directly over the surface water line. As these trees grow, root growth would be extremely likely to displace the pipework or even block the pipe should roots penetrate between the connections. This will lead to inefficiencies within the system or even a complete failure in the worst case scenario as this pipe is the only method of surface removal for the southern parcel of the wider development. If this were to happe, the knock on effect across the development could lead to flooding. The LLFA would request that the landscaping is resolved as a reserved matter and we would request sight of this before the Local Planning Authority approves this application. We note that the planting of large trees should not occur within 3 to 10 m depending on the tree species.

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.
We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

Flood Risk

The development site is located between Rossett Road and Harwoods Lane itself sits in Zone A on the NRW Development Advice Maps and is therefore not considered to be at risk from flooding. However, Harwoods Lane at the point that the access is to be constructed sits in Zone C2. The extent of this can be shown in Figure 1. In addition to this, Harwoods Lane was subject to flooding passable to vehicles in January 2021 and complete inundation during Storm Babet in October 2023. The latter event resulted in a road closure and a car is known to have become stranded in the flood waters due to the depth.



Figure 1: Map illustrating the extent of the C2 flood zone over Harwoods Lane, Rossett taken from the Natural Resources Wales Development Advice maps. The image on the left shows a light basemap. The image on the right shows an aerial photograph view of the same location.

Given the flood risk presented above, the LLFA Team have concerns about water entering the wider development site which is served by the pumping station. Topographical information provided in the Drainage Plan demonstrates that the verges on Harwards Lane are above the highway which, in turn, is above the area of public open space on the development site. Currently, the verges contain the water on the highway and prevent the development site from being flooded. However, the LLFA Team believe that allowing an access to be created from Harwoods Lane would create an opportunity for flood water to enter the site. Whilst the LLFA does not foresee that this would cause direct risk to residential properties, it is not clear if the level of water would be sufficient to exceed the capacity of the attenuation pond to the north of Harwoods Lane. The base of this attenuation area is some 2.15 mAOD below the highway, and so the natural flow path would be in this direction, but it is assumed that this would already be at capacity at 12.70 mAOD in the flood scenario presented.

The LLFA note that the attenuation pond approved under SAB/FUL/2023/0803 does not take into account any additional flows from offsite pluvial or fluvial flooding. If a further 1 mAOD of water were added via floodwater flow onto the site, the LLFA considers that there is a possibility of residential garden flooding within the wider development. Therefore, mitigation to prevent flood water entering the site in times of flood must be put in place before this development can be approved.

Emergency Pump Maintenance

The LLFA notes that complete failure of the pumping station is highly unlikely due to double nature of the pump. This is because a duty and a standby pump are present on site. Nevertheless, any difficulties experienced by the pumping station would be most likely to occur during a high rainfall or storm event. According to documents provided during SAB approval process, this will trigger an engineer call out to the site. However, given that Harwoods Lane is prone to flooding during such events and is often closed to the public, we do not consider that such a private maintenance team would be allowed to pass the road closures as they are not an emergency vehicle or an incident support vehicle unless a complete pump failure had occurred. We consider that an access route plan should be provided as a condition of this development but it should again be noted that the access appears to sit within Flood Zone C2 on the NRW Development Advice Map. Therefore, the possibility of stranded or abandoned vehicles blocking the access will remain and needs to be considered by the developer.

The LLFA Team advises that the Local Highways Authority (LHA) should be consulted on the suitability of any swept paths associated with a proposed access route.

Drainage to Serve Access

The LLFA Team note that no positive drainage is shown within the proposals for the access road. We note that there are only two possible connections points for drainage: the attenuation pond on the development site or the nearby highways drainage. The former would be the preferred option for the LLFA as this was allowed for the in the current SAB approval. However, as previously stated, this would be a method by which flood water from the River Alyn could enter the attenuation pond which has not been designed to take off-site water.

It is noted by the LLFA that the drainage on Harwoods Lane is unmapped and it is assumed that the system discharges directly into the River Alyn. The five gullies in proximity to the proposed access point have been installed in order to remove flood water at a faster rate from the highway rather than to prevent flooding. The LLFA, who monitor highways drainage on behalf of the LHA, do not consider that connecting the site drainage into this system would be suitable as the access road is assumed to be located below the existing highway on the topographical data provided. Again, this could provide a route for flood water to enter the development site if the highways drainage system were to become blocked during a high rainfall event as the gulley openings would be a low point through which water could surcharge.

The LLFA proposes that positive drainage is added to the Drainage Plan to show how surface water will be managed within the access road.

Proposed Conditions

Given the above points raised, the LLFA would like to ask that the following conditions are created for this application:

1. The approved amendment noticed issued by the SuDS Approving Body (SAB) is submitted to the LPA for review before the application is approved.

2. A full landscape plan providing clarity on the proposed tree planting is to be provided for the Lead Local Flood Authority for review as a reserved matter.

3. A full plan on the mitigation of flood waters entering the site will need to be submitted to the Lead Local Flood Authority for review before the application can be approved.

4. An access route plan which is not affected by flood risk will be provided to the Lead Local Flood Authority and the Local Highways Authority for review before the application can be approved.

If you have any questions regarding the above, please do not hesitate to contact the team via flooding@wrexham.gov.uk.

Yours sincerely,
Cathryn Hughes
Technical Flood Risk Officer
Lead Local Flood Authority Team

On Behalf of:
Darren Williams, Chief Officer
Environment and Technical Department
Wrexham County Borough Council