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COUNTY BOROUGH COUNCIL
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Eich Cyf/Your Ref: P/2025/0090
Ein Cyf/Our ref: SAB/FUL/2023/0804
Dyddiad/Date: 26/02/2025
Gofynner am/Ask for: Cathryn Hughes
Rhif Cyswllt/Contact No: 01978 729639
E-bost/E-mail: flooding@wrexham.gov.uk

Dear Matthew,

Site Address: The Racecourse, Mold Road, Wrexham, LL11 2AH
Site Description: Variation of Condition 2 of Planning Permission P/2023/0776 to Amend Design

Thank you for consulting the Lead Local Flood Authority (LLFA) Team in regards to the above application. At this time, the team would like to express **concerns** which we would like to raise for the consideration of the Local Planning Authority (LPA).

SuDs Approving Body (SAB)

The LLFA Team note that this development will be subject to Schedule 3 of the Flood and Water Management Act 2010 as enacted by the Welsh Government on 7th January 2019. As such, the drainage for the development will require approval from the SAB team before construction can commence. We note that the team was in receipt of a full application in 2023 under the reference SAB/FUL/2023/0804 which was withdrawn by the applicant. The LLFA consider that the extent of changes to the development would require a new application. The LLFA would advise the developer to contact the SAB at SAB@wrexham.gov.uk to apply for this approval at the earliest opportunity to prevent delays in the commencement of construction.

Flood Risk

On Site Flood Risk

It is noted by the LLFA that the immediate development site is not at risk from fluvial or pluvial flooding. However, we have some concerns in regard to the lack of positive drainage denoted in the plans supporting the Drainage Strategy as it is unclear if the block paving provides an infiltration function. In addition, there is a lack of information on how surface water will be channelled into the planter features where bioretention is proposed. It is assumed that these will only deal with the surface water captured by the channel drains at this time. The LLFA believes that the block paving surface should be adequately supported by positive drainage or cambering towards the bioretention to avoiding standing water in the publically accessible areas.

The LLFA welcomes the inclusion of drainage channels to prevent the egress of surface water runoff on to the public highway.

Off Site Flood Risk

It is noted by the LLFA Team that pockets of surface water (pluvial) flooding exists in the vicinity of the development. It is the opinion of the LLFA team that this could be exacerbated by the proposed drainage strategy presented in this planning application. We would refer the low to medium area of

surface water flood risk surrounding Wrexham General Station to the east of the development as shown by Figure 1 below.

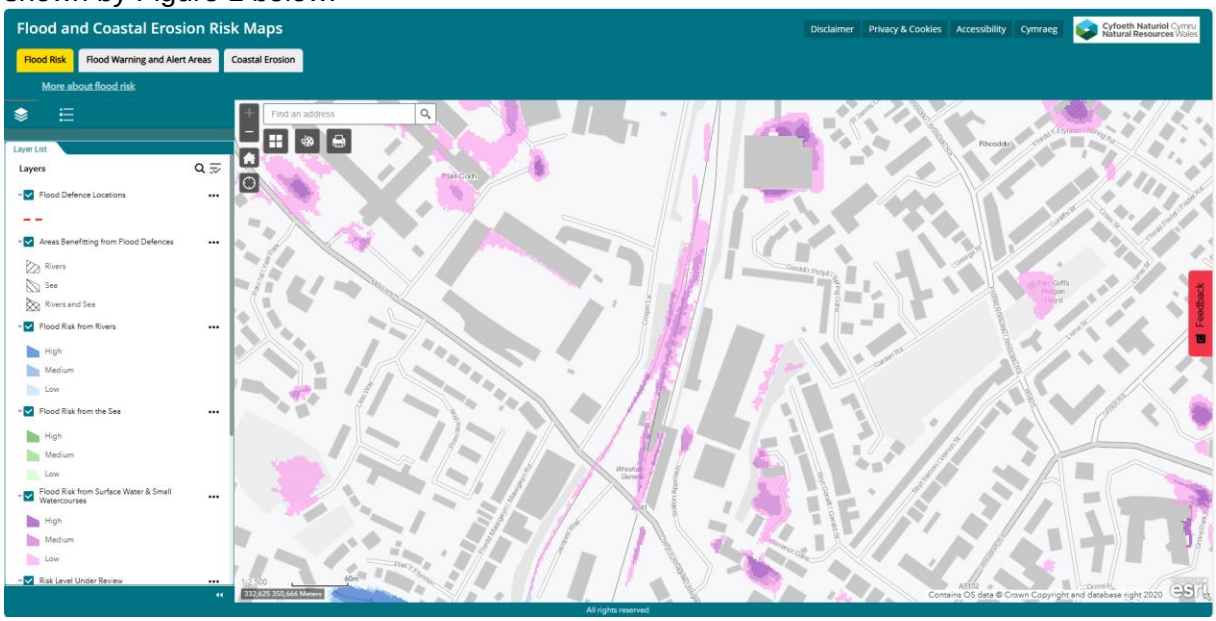


Figure 1: A Capture taken from the Natural Resources Wales Flood and Coastal Erosion Risk Maps demonstrating the flood risk types present within the immediate vicinity of the development.

The LLFA notes that the soakaway in the withdrawn SAB application referenced SAB/FUL/2023/0804 denotes a soakaway size of 160 m^2 whilst the Drainage Strategy provided within this application provides a soakaway size of 76 m^2. Our concern stems from the fact that the effective area of infiltration has now become more concentrated which can cause adverse impacts in the surrounding area. This is because the hydrostatic pressure created can trigger groundwater movement towards nearby slope faces where such pressure is markedly lower.

It is further noted by the LLFA by the ground investigations carried out in support of the withdrawn SAB application do not explore the suitability of the strata at the proposed depth of the attenuation crates. It will need to be determined if the strata is suitable for infiltration to this depth. If impermeable strata is present, this may cause springs to develop in the slope in the nearby railway cutting. The mechanisms described for surface water re-emergence above are shown in Figure 2.

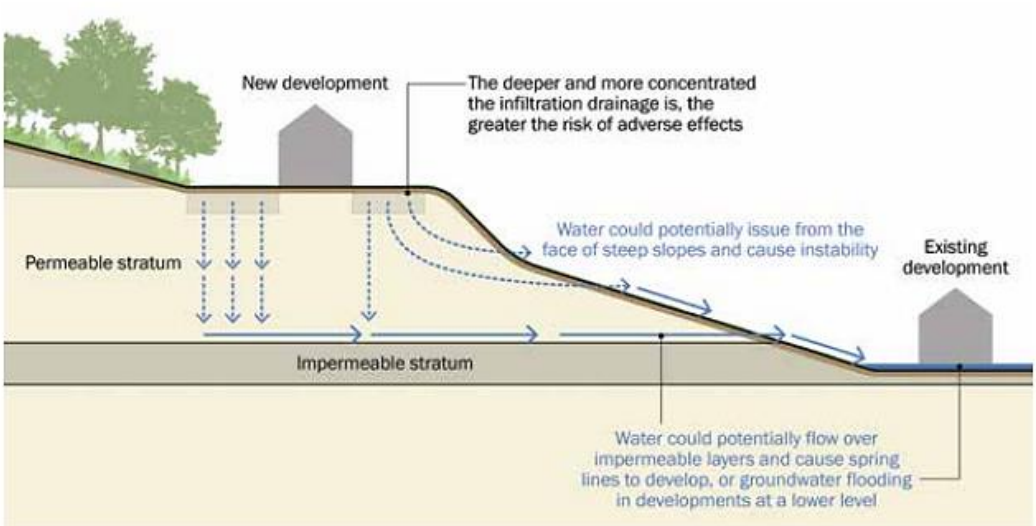


Figure 2: Impacts of geology on water flows from infiltrating drainage on sloping sites as taken from page 136 of the CIRIA SuDS Manual (2015).

Water Quality
The LLFA notes that 1 m should be maintained between the base of the infiltration crates and the groundwater table through the year. This is to meet with the water quality standards outlined by the Welsh Government in guidance supporting the delivery of the SAB. It is unclear if this can achieved from the Drainage Strategy presented in this planning application and in the ground investigation works presented in the withdrawn SAB/FUL/2023/0804.

Sustainability
The LLFA welcomes the use of permeable paving and bioretention planting in this application as sustainable methods of surface water management. However, we note that this is quite minimal given the scope of the development as it appears that the majority of the surface water generated by the roof in particular or by the west of the plaza is not directed towards such features.

The LLFA do feel that there has been a missed opportunity to integrate water reuse into the proposal due to the high water usage within the development including areas that are not covered by this planning application such as in pitch watering or toilet usage during match days. This would reduce the amount of water discharging to ground via the soakaway system which has a potential flood risk implication for the railway network in the cutting to the east of the site.

Conclusion
The LLFA has concerns for off-site flooding which could be exacerbated by this development and believe that opportunities have been missed to reduce the surface water quantity being discharged towards the soakaway features. Whilst we would like to raise these concerns with the LPA, it is the opinion of the LLFA that these matters can be dealt with within the remit of the SuDs Approving Body (SAB). Therefore, we have no conditions to propose to alleviate our concerns.

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