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Eich Cyf/Your Ref: P/2023/0050

Ein Cyf/Our ref: N/A

Dyddiad/Date: /06/2024

Gofynner am/Ask for: Cathryn Hughes

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Dear Gwyn,

**Site Address: Land at Stansty Fields, Mold Road.**

**Site Description: Residential development of 96 no. dwellings and associated infrastructure.**

The Lead Local Flood Authority (LLFA) Team would like to enter a **holding objection** to this development. We believe that there is insufficient to justify the drainage strategy posed by the developer. There are also a number of conditions that we wish to be placed on the development relating to other issues with this application.

### **Drainage Strategy**

The Lead Local Flood Authority Team note that the main method of surface water management for the proposed development is the use of an infiltration basin. However, ground investigations have not taken place to confirm if the soil on site is of a type which is freely draining. In addition, the infiltration testing which supports this method of surface water management has not been provided. We have been led to believe by testimony to the team that the development site can become quite waterlogged, and this would mean that infiltration is not a viable option. We note that the depth between the base of any infiltration system and the top of the water table should be 1 m. This is to prevent flooding and ensure good water quality. Therefore, we would like to see full site investigations and an infiltration test report before our objection can be removed.

The LLFA notes that an alternative drainage strategy is provided within the Flood Consequence Assessment which would rely on partial infiltration and discharge to watercourse. Again, this is not supported by sufficient evidence in the report and the LLFA would expect to see more attenuation storage added to the development site if this strategy were to be pursued.

### **Flood Risk**

The Lead Local Flood Authority notes that the site sits within Zone A for fluvial flooding. As such, no part of the development would be at risk from flooding from main rivers. However, the LLFA notes that an area of medium to high risk of surface water flood exists in the depression to the east of the site. The developer notes that this flood risk will be addressed through regrading. We disagree with this approach as it increases the rate surface water will reach the east of the site. The LLFA believe that this depression would be better utilised within the drainage system as a part of the SuDS Approving Body (SAB) application layout. This would improve the amenity and biodiversity availability within the site which is currently lacking.

The LLFA Team would like to raise flooding issues within the immediate vicinity to the site. The location of reports can be found in Figure 1. These reports have been largely attributed to surface water flooding during high rainfall events. It should be noted that none of these reports contain

internal property flooding, but that most of the reports relate to multiple gardens being flooded. We note that the development should not exacerbate these issues as the proposed discharge from site will match the greenfield runoff rates. The issue of the discharge rate will be determined during the SuDS Approving Body (SAB) application process, but we are satisfied with the directions of discharge towards the east of the site.



**Figure 1: Reports of flooding received by the LLFA Team within the last 12 months as shown by the red dots containing black circles.**

### **Ordinary Watercourse**

The Lead Local Flood Authority note two ordinary watercourses in close proximity to the development. Both of these ordinary watercourses serve as the outfall point for the drainage of existing developments and highways. Any detriment to flows within these via diversion or constraint is likely to affect the ability of these systems to convey water away from properties. Therefore, no development or construction work should occur within 5 m from the top of the banks of the watercourses. This includes SuDS features other than where a proposed connection must occur.

The LLFA advise that the developer should contact the team should any works need to be carried out to the ordinary watercourses. Such work would require an ordinary watercourse consent from the LLFA.

It is noted by the Lead Local Flood Authority that the watercourse to the south of the development site is culverted under the A541 Mold Road. As such, the Highways Authority is responsible for ensuring the free flow of water through this culvert. This means that machinery will need to be able to access this outfall at all times to address blockages. In addition, the outfall will need to be inspected by the LLFA periodically under our statutory duties to maintain a flood asset register under Section 21 of the Flood and Water Management Act 2010. We ask that no part of the development impedes access to the outfall to ensure that the correct maintenance can be carried out.

### **Foul Sewerage Connection**

The Lead Local Flood Authority notes the response from Dwr Cymru Welsh Water who are a partner risk management authority in flood related matters. We believe that there is insufficient capacity to allow the development to be connected into the existing sewerage systems without detriment being caused. We note that overloading of any drainage system, be it foul or combined,

can cause flooding to both properties and the highway. The LLFA would ask that this matter is resolved before the development is allowed to proceed.

### **SAB**

This development requires approval from the SuDS Approving Body (SAB) under Schedule 3 of the Flood and Water Management Act 2010 which was enacted by the Welsh Government from 7<sup>th</sup> January 2019. We note that we have not received any prior engagement with the SAB from the developer regarding this site. It is noted by the LLFA that the current proposal, as outlined in the Flood Consequence Assessment, does not appear to meet water quality, amenity and biodiversity statutory standards. We would welcome the developer to engage with the SAB team at the earliest convenient opportunity to remedy this.

### **Proposed Conditions**

With our above response in mind, the LLFA would like to propose that the following conditions are placed on the development should planning be granted:

1. A full site investigation is provided to support the provided drainage strategy.
2. A full infiltration test report is provided to support the provided drainage strategy.
3. No development should occur within 5 m of the top of the banks of the ordinary watercourses.
4. Access is maintained to the outfall under the A514 Mold Road to allow for the correct maintenance of the culvert by the Highways Authority.

If you have any questions regarding the above, please do not hesitate to contact the team via [flooding@wrexham.gov.uk](mailto:flooding@wrexham.gov.uk).

Yours sincerely,

Cathryn Hughes  
Lead Local Flood Authority Team  
Environment and Technical Department  
Wrexham County Borough Council