

AnnS Jones

From: Louise Phillips
Sent: 26 January 2018 09:38
To: planning_admin
Subject: FW: P/2017/0290
Attachments: image001.png; image002.png; image003.png; image004.png; image005.png; image006.png

Can this be put on P/2017/0290 as flood officer comments please

From: Neil Taunt
Sent: 26 January 2018 09:33
To: Louise Phillips
Subject: FW: P/2017/0290

From: Neil Taunt [mailto:Neil.Taunt@wrexham.gov.uk]
Sent: 26 January 2018 09:31
To: Neil Taunt
Cc: Neil Taunt
Subject: FW: P/2017/0290

-----Original Message-----

From: Neil Taunt [mailto:Neil.Taunt@wrexham.gov.uk];
Sent: 20/04/2017 10:13:37
To: Kevin Hughes [mailto:Kevin.Hughes@wrexham.gov.uk];
Subject: P/2017/0290

Hi Kevin,

Thank you for the recent consultation on the above application site.

The majority of the site falls within an area of surface water flooding defined by NRW's Updated Flood Map for Surface Water. Significant portions of the site are identified as being at risk of surface water flooding during the 1 in 30, 1 in 100 and 1 in 1000 events.

The general locality is known to have a high water table, with saturated conditions common place on the site (Located within 200m of Fenns Moss this is an area characterised by peat bogs and high water tables). Previous applications for development on this site by the applicant have included Ground Investigation Reports that clearly highlight the issues associated with flood risk to the site, high groundwater table, marshy ground conditions and lack of suitability of soakaway across the site. The site has been observed to experience significant areas of standing water over large areas in recent years. This is supported by photographic evidence (Figures 4 & 11) included within the supporting Phase 1 Environmental Appraisal (Greenscape Environmental Ltd, September 2016, ref: 1582 001R). Section 4.2.2 also observes that the

northern part of the field is an “*overgrown wetland area....generated by high levels of ground water in the Bettisfield area, removal of topsoil and poor drainage.*”.

The Existing drainage network both on and away from the site is very flat, with very limited flow away from the site with no flow conditions experienced for large periods of time. In addition the proposed site layout would appear to include development of property directly over the exist, partially culverted, watercourse that runs SW to NE across the site. This watercourse also receives surface water runoff from the recently completed development of 4 properties to the west of the site. Wrexham CBC does has a policy regarding the culverting of watercourses and would normally object to any new culverting except in very specific circumstances (e.g. limited road access).

There are historic incidents of flooding of property in the locality, thought to be associated with the conveyance of surface waters.

A supporting Flood Consequence Assessment does accompany the application. This does contain a number of fundamental errors and inaccuracies with regards to the classification of the site and in reference to the requirements of TAN15. Despite these inaccuracies, the FCA does not address the significant flood risk concerns raised in correspondence with the applicants agent prior to submission of this application.

In addition to the comments above I have significant concerns with regards to flood risk with regards to both the re-profiling of the site and surface water management system proposed to manage surface water generated by new impermeable surfaces.

With regards to the re-profiling of the site, Section 3.4 of the FCA does detail mitigation to minimise the risk of flooding to the development. The FCA assumes the site will flood to a depth of 300mm. To mitigate, it would appear that a cut and fill operation is required. The FCA makes reference to an area but this does not appear on any supporting drawing or plan. Any development that will act to increase ground levels will result in a loss of potential flood storage area. To counter this it is proposed to lower a portion of the site to the level of the adjacent ditch network. I have significant concerns as to the suitability of this proposal for a number of reasons:

- Ground raising will result in a net loss of flood storage area, with the real potential of increasing flood risk to neighbouring properties by displacing flood waters.
- Surface water flow routes that would appear to converge on the area of land proposed for the development site. Ground raising may truncate these flow routes and increase flood risk to neighbouring property.
- Any lowering of ground levels to provide compensatory flood storage volume are unlikely to be successful due to known high ground water levels in the area. Any excavated volume below existing ground level is likely to be made redundant as it will be filled by ground water, resulting in an unacceptable increase in flood risk to the surrounding area and properties.
- As mentioned above, no consideration has been given to the existing drainage network on the site, with property being proposed over the existing line of a watercourse that runs SW/NE across the site.

With regards to the management of surface waters generated from the site, it would appear that the proposal would result in an attenuated discharge into the existing watercourse network. No details of the required sizing of the system has been included with the application. The issue of the functionality of the local drainage network was raised with the applicants agent prior to the submission of this application. The drainage network is known to be flat and does see significant periods of no/reduced flow. Prior to being able to comment on surface water drainage proposals for this site, an assessment of the ability of the local drainage network will be required to ensure there is sufficient capacity to cope with a formalised discharge into the existing network. This would need to demonstrate no adverse impact on the surrounding area associated with any new/proposed development. If a feasible discharge can be identified and accepted, a detailed drainage design, identifying how surface waters generated from the site will be managed to replicate the undeveloped state will be required, including calculations of greenfield runoff rates and any attenuation requirements needed on site (guidance can be found at http://www.wrexham.gov.uk/english/planning_portal/publications/surface_water.htm). Previous applications for development on this site were unable to achieve this. In the absence of this information and demonstration that a suitably sized surface water management system will function over the life of the development, it can only be assumed that the development would result in an increase in flood risk to the surrounding area and properties.

In the absence of any of the above information it is not possible to identify if there is a practical and achievable solution to managing flood risk both to the site and surrounding community from this development that will not result in an unacceptable increase in flood risk both to the development site and elsewhere. I would, therefore, recommend that the application be refused on flood risk grounds unless the above concerns can be adequately addressed.

If you have any question on the above or wish to discuss further please let me know.

Neil Taunt MCIWEM C.WEM CEnv CSci

Uwch Swyddog Rheoli Llifogydd / Senior Flood Management Officer

 01978 729734 / 07808 787632

 Amgylchedd a Chynllunio, Cyngor Bwrdeistref Sirol Wrecsam, De Ffordd yr Abaty, Ystad Ddiwydiannol Wrecsam, Wrecsam LL13 9PW

 Environment & Planning, Wrexham County Borough Council, Abbey Road South, Wrexham Industrial Estate, Wrexham LL13 9PW

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