

DH/4037.06/LB  
10 December 2015



Mr Neil Taunt  
Housing, Public Protection and Environment Department  
Wrexham County Borough Council  
Abbey Road South  
Wrexham Industrial Estate  
Wrexham LL13 9PW

**BY EMAIL ONLY**

Dear Mr Taunt

**BOOZEY FIELDS, OLD MOLD ROAD, GWERSYLLT: YOUR REF P/2015/0790**

We write in response to the comments made to the officer handling the outline planning application for the above site.

Boozey Fields has an area of 2.4Ha and is located within a catchment with a total area of 69Ha and thus constitutes 3.5% of the catchment. The discharge from the site is via a 150mm drain run passing below Old Mold Road. This drain has been inspected and was found to have collapsed. The drain connects into a culvert which passes below the A541 dual carriageway. This in turn discharges into an open ditch, 355m long before passing below the railway. On the east side of the railway the watercourse connects to a series of small ponds which appear to be part of a naturally occurring infiltration basin within an area of open fields. The investigation carried out to date has established a "drainage right" (through the connection to the existing drainage system). Given the poor condition of the 150mm discharge pipe from the Boozey Field site and its importance to the drainage strategy, the Developer proposes to replace this asset to return it to good condition.

The NRW surface water drainage maps identify that there is a medium risk of flooding in the hollow on the upstream fence of the A541 embankment at the point where the culvert passes beneath the highway. The drainage strategy for the Boozey Fields site includes proposals to limit the discharge to the 1 in 1 year flow of 5l/s. If it is assumed that a 'medium' risk of flooding coincides with a 1 in 30 year return period event and a 'low' risk of flooding with a 1 in 100 year return period event, then the proposals mitigate the extent of the flooding as quantified in the following table:

| Return Period<br>years | Unattenuated Discharge<br>l/s | Attenuated Discharge<br>l/s | Reduction in Discharge<br>Value<br>% |
|------------------------|-------------------------------|-----------------------------|--------------------------------------|
| 1                      | 4.27                          | 5.0                         | +17                                  |
| 30                     | 7.61                          | 5.0                         | - 34                                 |
| 100                    | 9.32                          | 5.0                         | - 46                                 |

*Continued...../*



**BOOZEY FIELDS, OLD MOLD ROAD, GWERSYLLT: YOUR REF P/2015/0790**

While these values are a significant reduction in the volume of discharge from the Boozey Fields site itself, the overall impact on the catchment is minimal, given that the site only forms 3.5% of the catchment area. As it is proposed to contain the run-off from more severe storms (*ie* 1.0% AEP + CC) within the site curtilage it is unlikely that the development will exacerbate any offsite flooding problems (if they actually occur). The flooding shown on the NRW mapping is confined to agricultural land, even for low risk events.

As the proposal uses an existing 'drainage right' to discharge surface water from the site, does not increase annual discharges beyond practical levels and reduces the volume discharged from the site in the medium and long term, we can see no valid reason to object to the current planning application on flood risk grounds.

Wrexham County Borough Council currently discharges highway water to the land drainage network and are understood to be the riparian owner for the section of culvert under the bypass. Our investigations suggest that the existing system functions satisfactorily (*ie* a dye test shows that water drains under the bypass and into the downstream ditch). However this downstream facility was full to bank level at the time of our survey and water had backed up through the upstream culvert. It is therefore likely that at least part of the system has silted up. Clearing this blockage and bringing the system back into good working order is clearly the responsibility of the riparian owners and, if they fail to act then we believe that your Authority has powers under the Water Resources Act to undertake the necessary works and recover the associated costs.

That said it is clearly in our Clients' interest for the offsite drainage system to be free flowing, however they have no powers to undertake the maintenance works themselves. However we believe that they would not object to making a reasonable financial contribution to rectifying the current problems, provided of course planning consent is granted for the proposed development. This would be on the clear understanding that this would be a one off payment made to your Authority to undertake the required maintenance works and that there would be no further liability in the future.

We understand that you will make enquiries with your colleagues in the Highway Department to establish the nature of the culvert under the bypass and whether it was renewed when the road was constructed.

It would be helpful if you can let me know the results of your enquiry and confirm to the Planning Authority that you have no material objection to the proposed development.

Yours sincerely  
for **RBA LTD**

A handwritten signature in black ink, appearing to read 'David R. High'.

c: Wrexham County Council, Planning Control