MEMORANDUM

From: Chief Officer, Environment & Technical

To: Chief Officer, Economy and Planning

FAO: Jenni Perkins

Your Reference: P/2025/0337

Our Reference: SAB/PRE/2025/0301

Date: 13/08/2025

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL:
Demolition of two double classroom buildings and replacement with a new 4 classroom block for infants/new nursery (phase 1). Construction of new 4 block classroom for juniors (phase 2)

LOCATION:
Ysgol I.D. Hoosen, Heol Caradoc, Rhosllanerchrugog, Wrexham

We refer to your re-consultation as per the email dated 10/08/2025 in respect of the above following the submission of additional information by the developer. This response is provided on behalf of the Lead Local Flood Authority (LLFA) and includes comments based on the SuDS Approving Body (SAB) statutory function which it delivers. We have reviewed the documentation submitted. Unfortunately, the LLFA continues to **OBJECT** to this application based on the flood zone status of the development site, the off-site flood risk affecting access to the development and the condition of existing drainage assets. However, we do believe that some of these objections could be overcome through the implementation of conditions.

Lead Local Flood Authority (LLFA)
The LLFA, as established under the Flood and Water Management Act 2010, is the responsible risk management authority for surface water, ordinary watercourse and groundwater flooding.

Flood Zone Status
The LLFA Teams observes that the proposed development sits in Flood Zone 3 for surface water, or pluvial, flooding. The extent of this flood zone area is shown in Figure 1. The development proposes an extension to an existing school site. The LLFA notes that this would be classed as highly vulnerable development under TAN 15 and allocation for such development, even as a part of re-development, should be avoided in this flood zone.

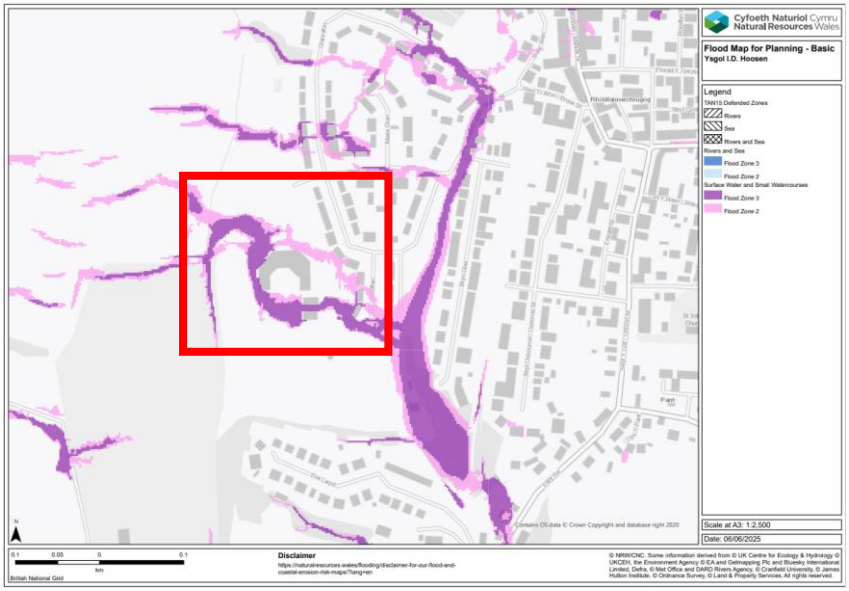


Figure 1: The pluvial flood risk present on the proposed development site in the wider context of flood risk in the area. The map is derived from the NRW Development Advice Map (DAM).

As per our previous responses of 17/06/2025 and 17/07/2025, the LLFA recognises that this is an extension to an existing educational site and that it would be difficult to locate the proposal elsewhere and outside of the flood zone. As such, we felt that it was incumbent on the developer to provide evidence that the flood risk to the development would be within the tolerable limits outlined in TAN 15. Following the submission of amended plans, the LLFA is satisfied that the surface water flooding will be directed away from the building. Thus, the proposed development will be located within the tolerable limits outlined by TAN 15.

The LLFA acknowledges that the development sits in Flood Zone 1 for fluvial flooding from rivers and sea. Development in this flood zone would be of no concern if pluvial flood risk were not present. As no fluvial flooding affects the site and no pluvial flood defences are in place, it is not located within a TAN 15 defended zone.

Existing Site Drainage

In our earlier responses of 17/06/2025 and 17/07/2025, the LLFA Team had been led to believe that there were existing flood alleviation measures on site. The location and workings of this was omitted from the Flood Consequence Assessment (FCA) which submitted in support of the application. However, following further information being provided by the developer, the LLFA has been able to determine that this flood alleviation is contained within the existing drainage system present on the site.

The LLFA has concerns about the working and condition of this system. This can be attributed to poor maintenance since the installation of the system when the original school development was constructed. The LLFA acknowledge that the pipework associated with the surface water drainage is in an acceptable condition. Siltation in some pipe stretches is noted, but we believe that this would be resolved following a full cleanse of the system. Our concerns relate primarily to the existing swale feature which is located to the south east of the existing site. It has been made clear to the LLFA that this system has infilled by debris over time due to lack of maintenance. As such, the drainage system is suffering from reduced capacity and is this is more likely to be exceeded in a flood event. The LLFA considers that the maintenance work to open up this asset should be carried out before construction is commenced on site. Provision for the manintenance of the existing drainage pipework and swale should also be built into to the maintennace plan of the site.

The LLFA notes that the capacity of the existing swale will be assessed during the SuDS Approving Body (SAB) process to ensure that the additional discharges into the system do not exceed the design capacity of this feature.

Flood Alleviation Proposals

It is noted in the Flood Consequence Assessment submitted in support of these developments that flooding impacting the development site would be dealt with through a flood alleviation area. The LLFA welcomes the information submitted as a part of the amended plans in regards to the flood storage area that is to be created on the development site. We note that the proposal is to excavate some of the existing playing field to create a swale in which any flooding can sit before being channelled out to a nearby watercourse at a controlled rate via the existing drainage system. The LLFA is led to believe that the school field is made ground which has previously been capped. We would recommend that the LPA consults with the Minerals and Contaminated Land Team as to the suitability of this proposal. In our previous response dated 17/06/2025, the LLFA raised concerns in regards to the exceedance flows from any proposed flood alleviation schemes. We note that the amended plans should a betterment to the existing flood scenario which affected existing properties as 50.7 m^3 of storage is now provided. However, the exceedance scenario of a pipe blockage or the overtopping of this system has not been submitted as a part of the Flood Consequence Assessment (FCA).

Access during Flood Events

The LLFA would ask the LPA to continue to consider offsite flooding which affects access to the proposed development within its determination as this information was not considered in the Flood Consequence Assessment (FCA). During normal conditions, access to the proposed development is along Brook Street and up Heol Caradoc. However, Brook Street is prone to frequent flooding after heavy rainfall over periods of a few hours or thunderstorm events to a level where road closures are required. As such, an unofficial evacuation route via a car park off Bonc Wen is in place as demonstrated in Figure 2.

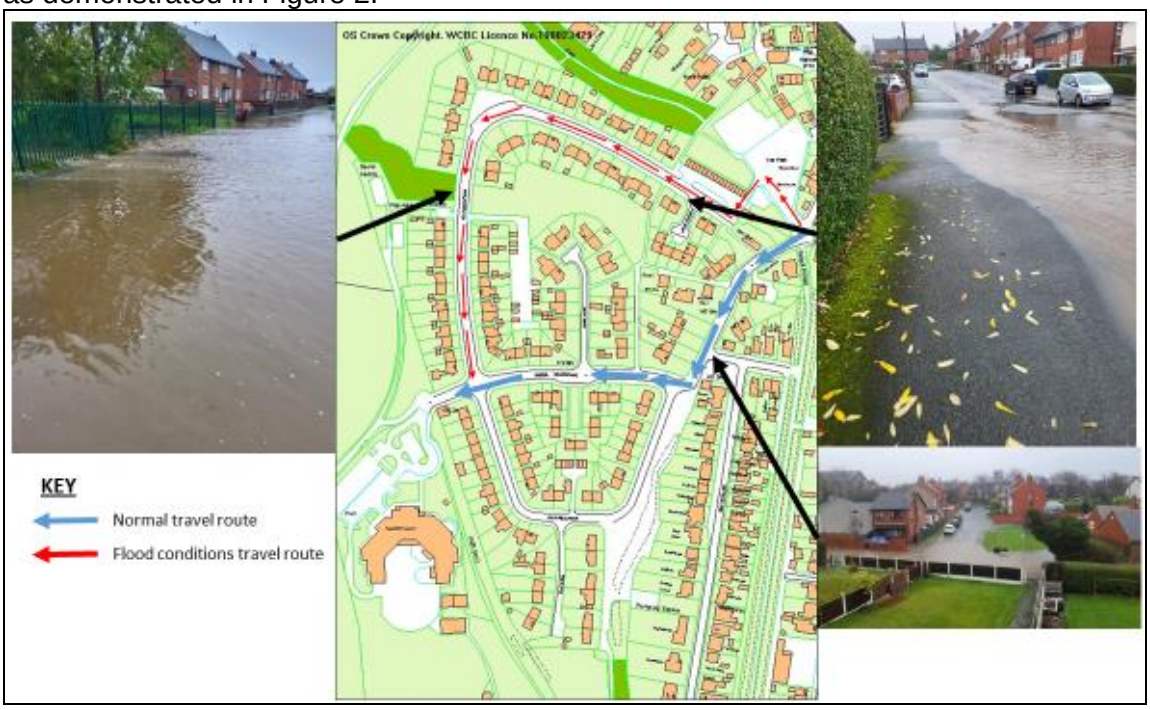


Figure 2: An illustration showing the normal vehicular route to Ysgol I.D. Hoosen and that taken when flooding prevents vehicular movements through Brook Street. The photographs illustrate flooding on both routes in the most recent flood event affecting the community on Wednesday 16th October 2024.

The LLFA observes that this emergency access route to the school also suffers from flooding in more extreme rainfall events. Figure 2 shows images from the most recent flood event on 16th October 2024, which illustrates how impassable both routes towards the school can become during a high intensity rainfall event. In addition, the LLFA acknowledges that pedestrian access during such flood events to the development would become difficult due to the flow velocities of the water from the overtopping of the Afon Goch tributary culvert on to Glanrafon. Pedestrian access to the development via Brook Street during such flood events is also not encouraged due to the depth of

the floodwater. The LLFA are aware that the flood scenarios in Figure 2 can cause combined sewerage systems to be overwhelmed and so the floodwater is likely to be contaminated.

In addition, the LLFA has concerns that the increased traffic movements proposed by the development would exacerbate flooding issues through the movement of vehicles creating bow waves entering flooded properties. The LLFA would like to refer to LPA to the comments made by the Local Highways Authority (LHA) in regards to the suitability of this emergency access route in relation to road safety, pedestrian access and access for emergency vehicles.

In regards to the issues raised by this section, the LLFA would like to request that an emergency evacuation route is included in the Flood Consequence Assessment (FCA) given the Flood Zone classification of this development. We note that no flood warnings are available for this location so the LLFA feels that the triggers for preventing harm the users of the proposed development is quite key to the application and should form part of the application.

SuDS Approving Body (SAB)

It is noted 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 to ensure compliance with the National Statutory Standards for Sustainable Drainage Systems. Whilst the approval of the SAB is independent of the planning process, we ask that the below comments are taken into consideration as a part of this application.

An overview of the application in relation to the statutory standards is included below. We note that these comments has been made in consideration of the pre-application SAB advice allocated the reference SAB/PRE/2025/0301.

Standard 1: Surface Water Runoff Destination

In order to comply with the Statutory Standards for Sustainable Drainage Systems, the development must work through the different priority levels of the discharge hierarchy as follows:

1. Surface water runoff is collected for use.
2. Surface water runoff is infiltrated to ground.
3. Surface water runoff is discharged to a surface water body.
4. Surface water runoff is discharged to a surface water sewer, highway drain or another drainage system.
5. Surface water runoff is discharged to a combined sewer.

The SAB is satisfied that the development cannot achieve substantial water reuse. We are also satisfied that infiltration is not a viable method of surface water management on this development site due to the presence of made ground and the proximity of nearby coal workings. Therefore, the SAB accepts that the development proposes to discharge its surface water through an existing drainage system which discharges to the Afon Goch. However, it should be noted that this watercourse presents a significant downstream flood risk to properties and highway infrastructure on B5097 Pant Hill, Rhosllanerchrugog as shown in Figure 3. In part, this is due to a reduced capacity culvert located under the old railways line off Lower Mountain Road. The LLFA Team has evidence of this flooding in 2005, 2012, and 2016. Of these, both the 2005 and 2016 events led to internal flooding to properties.

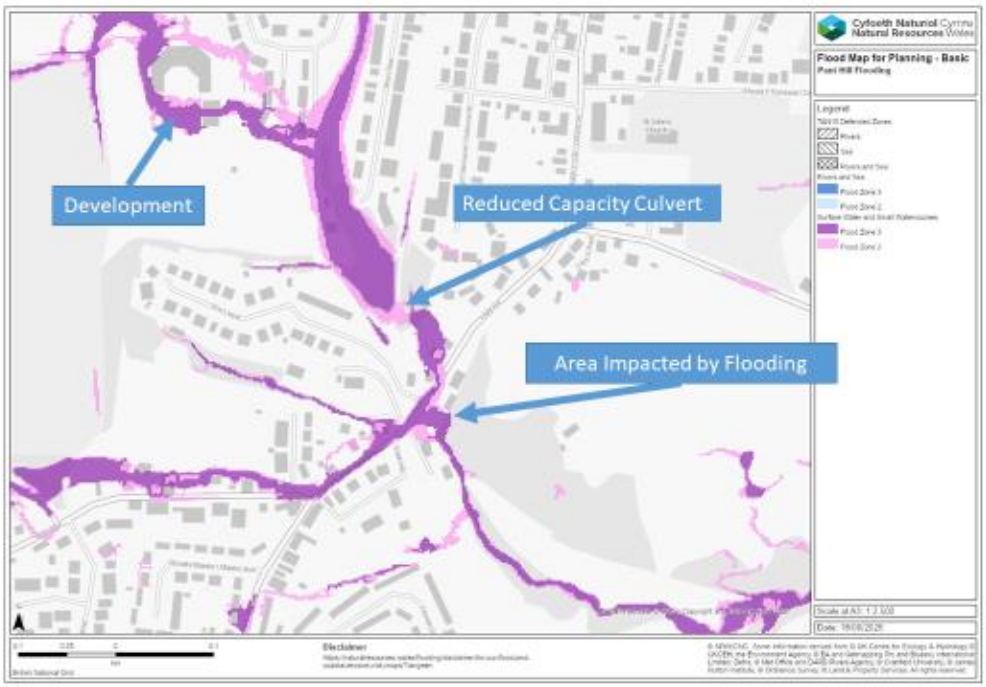


Figure 3: An overview of the offsite flood risk associated with the Afon Goch. The proposed development is located to the top left of the image.

The LLFA noted in its previous responses of 17/06/2025 and 17/07/2025 that we had concerns that the development could not be discharge to the Afon Goch without increasing the downstream flood risk. However, following the submission of CCTV footage of the existing drainage system, we can confirm that the existing discharge from the site is already subject to a controlled rate of 4.3 l/s. Thus, the LLFA considers that the development will not generate a downstream flood risk.

Despite the above, the SAB considers that the existing drainage system has not been properly maintained. We consider that the drainage system must be fully reinstated and a maintenance plan must be established as per the LLFA assessment of the existing drainage on site.

Standard 2: Surface Water Runoff Hydraulic Control

Evidence provided to the SAB as a part of the pre-application advice and in the planning application suggests that the developer intends to discharge water at brownfield runoff rate. This is not accepted by the SAB as it does not comply with the Statutory Standards for Sustainable Drainage Systems. As per page 25 of the statutory guidance issued by the Welsh Ministers, previously developed sites should be reduced to the greenfield rates wherever possible. This is because the critical storm duration for the attenuation storage system will be much longer than that used to size the existing drainage on site. There is a risk that, by allowing development runoff rates to occur, receiving watercourse damage and flood risk could be made considerably worse. Thus, if the developer were to pursue the use of a brownfield runoff rate to size attenuation, a betterment of at least 30% would be required.

The SAB notes that the use of a brownfield runoff rate has been proposed due to the small discharge of the greenfield runoff rate. The final runoff rate from the new part of the development has been agreed via the SAB pre-application advice service at 0.5 l/s through SAB/PRE/2025/0301. This runoff discharges into an existing drainage system which itself have a controlled discharge rate of 4.3 l/s. It is the understanding of the SAB that this discharge rate will not increase as a result of the proposal.

Despite the above, it remains the opinion of the SAB that the drainage should have been ungraded for the whole site as a part of the proposed development. As such, the final discharge from the site should have been designed to greenfield runoff rate.

Standard 3: Water Quality
The SAB is satisfied that this standard has been met.

Standard 4: Amenity
The SAB is satisfied that this standard has been met.

Standard 5: Biodiversity
The SAB is satisfied that this standard has been met.

Standard 6: Construction, Operation and Maintenance
The SAB is satisfied with the maintenance plan which has been provided as a part of the pre-application advice application. However, it is clear from conversations with the developer and the lack of information included regarding the existing flood alleviation structures that drainage maintenance has been lacking on the development. As a result, the SAB would like the maintenance plan for the new development to include the existing drainage assets on site.

Outstanding Issues on the Site

1. The LLFA notes that no assessment has been provided of the existing flood alleviation systems on the development site. As per TAN 15, the Flood Consequence Assessment (FCA) should assess the impact and consequences of any overtopping within this system as a result of the extension of the development.

2. The LLFA would like to request information surrounding emergency access routes from the proposed development site to be included in the Flood Consequence Assessment (FCA).

3. The LLFA, acting within its role as a SAB, would request that the drainage design is amended to control the discharge to greenfield runoff rate. If justification can be provided as to why this is not possible, then the SAB will accept a brownfield runoff rate with a betterment of at least 30%. A smaller betterment will result in the development not obtaining SAB approval.

Proposed Conditions

Condition 1:
No part of the development shall commence until a scheme detailing the remediation of the existing surface water drainage system has been submitted to and approved in writing by the Local Planning Authority. This must include:

1. A full and complete cleanse of the existing pipework.
2. The reinstatement of the existing swale for the purposes of attenuating flood flows.
3. A comprehensive maintenance plan of the future maintenance of the existing assets in compliance with the Statutory Standards for Sustainable Drainage Systems.

The scheme as approved shall be fully implemented prior to the first use of the development.

Conclusion
To conclude, the LLFA Team would like to **OBJECT** to this development. This decision has been made based on the information submitted to the LPA and that which we are privy to in our role as a SAB. Whilst this is an existing and operational site, the LLFA does not feel that the flood risk to the site has been adequately considered as illustrated by the missing components in the FCA as required by TAN 15. This point is exacerbated by the highly vulnerable categorisation of this development and the fact that access during times of high rainfall is compromised by existing flooding issues off site.

It is noted that a number of comments have been made in relation to SAB requirement of this development. The LLFA is satisfied that these comments can be dealt with via the proposed condition above and through the SAB process.

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