MEMORANDUM

From: Chief Officer, Environment & Technical

Your Reference: P/2025/0597

To: Chief Officer, Economy and Planning

Our Reference: N/A

FAO: Matthew Phillips

Date: 14/10/2025

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL
RESERVED MATTERS PERSUANT TO OUTLINE PLANNING PERMISSION P/2019/0923 (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE) – ERECTION OF 196 DWELLINGS (PHASE 1)

Location
LAND EITHER SIDE OF STANSTY CHAIN ROAD OFF A483 TRUNK ROAD AND A541 MOLD ROAD STANSTY WREXHAM LL11 4YF

We refer to your consultation as per the email dated 15/08/2025 in respect of the above. 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. The LLFA notes that this development is a phased residential development which is classified as highly vulnerable to flooding for the purposes of flood risk management. Our response below is only applicable to Phase 1 of this development which includes the southern portion of the development site.

The LLFA **IS UNABLE TO SUPPORT** this application to approve reserved matters. This is due to likelihood that the layout will be changed as a result of the SuDS Approving Body (SAB) application.

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 accepts that the development site sits within Flood Zone 1 for fluvial flooding due to a lack of main rivers running through the site. However, the Flood Map for Planning shows that the site does suffer from pockets of surface water flooding which pose differing levels of concern for the LLFA Team. These are shown on Figure 1 below:

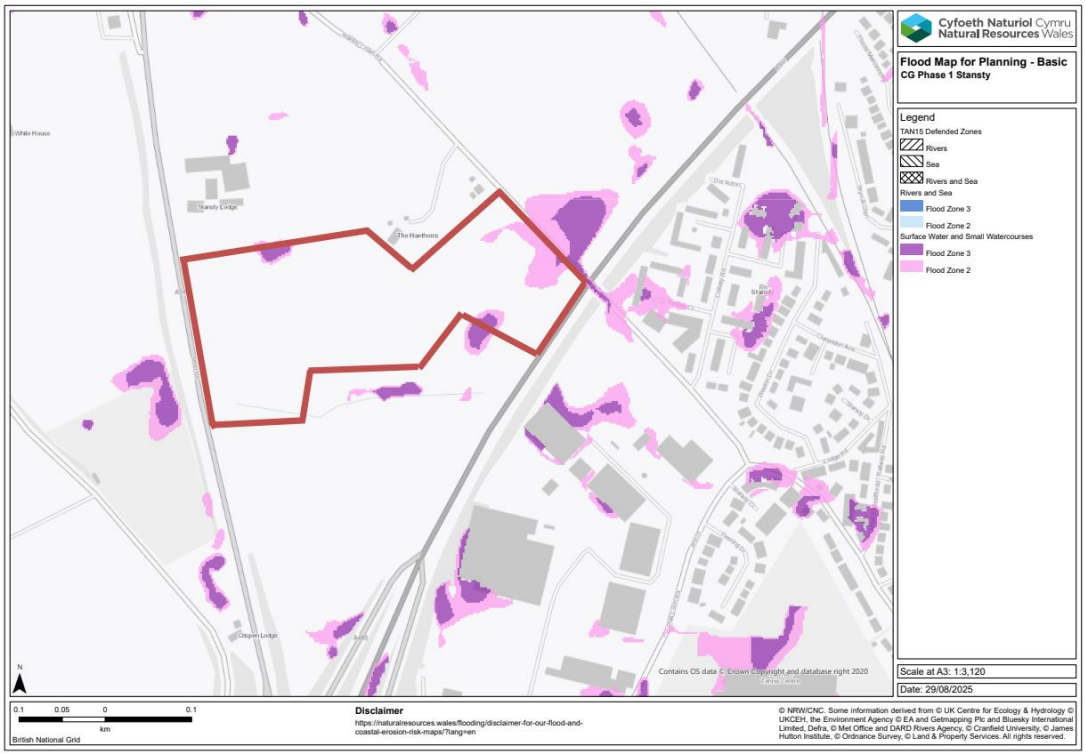


Figure 1: An overview of surface water flood risk affecting the development site within the approximate boundary of P/2025/0597.

Of most concern to the LLFA is the area of surface water flood risk to the east of the site. This area of flooding is believed to be a consequence of the site topography. It results from surface water becoming trapped by the embankment on which the A483 is built and being channelled towards Stansty Chain Road where the proposed site entrance would be located. It is the understanding of the LLFA Team that this water is currently drained through the highway drainage system when the highway becomes flooded. The LLFA does not believe that this scenario can be managed through the landscaping of the site as surface water flows will always restricted in this location by the road embankment supporting the A483. The LLFA is also concerned that this area of flood risk does affect proposed properties which should not be constructed within Flood Zone 2 as per TAN 15.

We would request that the applicant provides an updated Flood Consequence Assessment (FCA) to reflect the risk created by the proposed site layout.

The LLFA observes that there are two more areas of surface water flood risk which are classified Flood Zone 3. We are satisfied that these are a result of depressions created by the undulating nature of the site. The LLFA is satisfied that this risk will be removed through landscaping on site and the installation of an appropriate drainage system. However, this should be confirmed by a new FCA to reflect the proposed site layout.

Conflicts with Existing Watercourses

The LLFA notes that presence of a watercourse on the land on which development is proposed. It is noted from the Flood Consequence Assessment provided under the outline planning permission for the site, under reference P/2019/0923, that the upstream catchment of the watercourse is thought to have been severed by the construction of the A541 Mold Road. As a result, the watercourse is believed to only serve the development site. However,

the LLFA would like to see further investigation into this to confirm that the watercourse has been cut off and that any works to the watercourse would not cause upstream flood risk.

In addition to the above, the LLFA would object to any interference with the channel of this watercourse due to the interception value that it provides to protect the proposed properties from the surface water runoff generated by the land to the south which appears to remain undeveloped as a part of the phased development planned for this site. TAN 15 notes that ordinary watercourses should be considered as a natural asset to the development. As such, the LLFA would request that no construction occurs within 10 m of the ordinary watercourse to preserve the channel. The LLFA also notes that maintaining the storage volume in the channel would be critical in the event that the culvert under the A483 became blocked to prevent flooding to properties.

It is observed that a footpath and section of private road with a turning head conflict with the channel or the requested 10 m easement of this existing watercourse in the south westernmost corner of the development layout. Should the watercourse be found to interact with the opposite side of A541 Mold Road, the LLFA consider that culverting this watercourse would be against the position outlined in TAN 15 and against the non-culverting policy adopted by Wrexham County Borough Council in 2013. Despite this, the LLFA accepts that crossings over the watercourse may be necessary to support movement through the development. Any such crossings affecting the watercourse will need to be reviewed by the LLFA through the ordinary watercourse consent process outlined in the Land Drainage Act 1991.

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 SuDS Approval Body (SAB) before construction can commence to ensure compliance with the Statutory 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 the SAB is not yet in receipt of an application and so the assessment below is based solely on the information provided by the drainage layout submitted in the application to the LPA. The SAB has also considered evidence submitted as a part of the outline planning application for the site which was submitted as P/2019/0923. The SAB notes that these comments are limited and we would request that a full Drainage Strategy is provided for review before the reserved matters approval is granted. However, we feel that it is important that we outline how the layout will be affected by the issues that we foresee below.

Drainage Strategy Overview

We note that the drainage strategy submitted as a part of the reserved matters varies significantly from the original drainage strategy proposed in the outline planning application for the same site under P/2019/0923. The SAB notes that the new drainage strategy for this phase of the development proposes the use of a piped system under the highway network system to single end point infiltration basin towards the east of the development. At this time, it is unclear to the SAB is the system shown is purely for the drainage of the public highway or if this is also the intended method of surface water generated by the properties.

Unfortunately, the SAB cannot support such a system for either surface water type as it does not comply with the main principle of sustainable drainage: to manage surface water as close to the surface and the source as possible.

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 notes that we cannot determine if the discharge level is appropriate given that a full drainage strategy has not been submitted. This is not helped by the ambiguity surrounding property-level drainage. At this time, it is assumed that the developer intents to infiltrate all of the water on site to the infiltration basin shown to the east of the development. It is noted by the SAB that the decision to infiltrate is based off the BRE 365 Soakaway Tests which we were carried out in support of P/2019/0923 in 2017. We note that the SAB will only accept infiltration tests which have been carried out within the past five years and so these will need to be carried out again before a SAB application can be made.

The SAB notes that if similar infiltration rates are returned, infiltration would favourable across the development site. As such, the developer should consider multiple “open” SuDS features which can infiltrate surface water across the site in multiple locations. This will preserve the effectiveness of the final infiltration feature through allowing sediments and other pollutants to be removed in a surface water management train. Furthermore, a SuDS management train will prevent as much soil pore blockage in the final feature and preserve its effectiveness for longer into the lifetime of the development. This reduces the cost of the operation and maintenance of the system going forwards.

Standard 2: Surface Water Runoff Hydraulic Control
The SAB is concerned that the infiltration basin sits partially within Flood Zone 2. As per the statutory standards, SuDS features which are critical to attenuating surface water runoff should not be located within flood zones. The SAB would request an alternative location is considered for any SuDS features with this level of criticality.

Furthermore, the SAB has concerns in regards to the proximity of the infiltration basin to critical highway infrastructure. We would recommend that consultation is undertaken with the Local Highways Authority and the North & Mid Wales Trunk Road Agency in regards to the easement that they would require from their assets. As a guide, the SAB would suggest that any infiltrating structure should be located at least 5 m away from any existing highway and 5 m away from the bottom of the road embankment supporting the A483.

Standard 3: Water Quality
The SAB is unable to determine if Standard 3 can be met by this development due to a lack of a full Drainage Strategy. It is the recommendation of the SAB that the Simple Index Approach is used to determine if this standard is met within a full Drainage Strategy.

Standard 4: Amenity
The SAB notes that this development will struggle to meet the requirements of Statutory Standard 4. The SAB observes that a lack of green and vegetated spaces has been included to the west of the development and we believe that this a missed opportunity to include additional infiltrating SuDS features which can double as public open spaces. It is noted that features such as tree pits along the roadways, which have been omitted since the submission for outline planning permission on this site, would create additional resilience to climate change within the development through benefits such as urban cooling and better air quality.

In addition to the above, the SAB does not consider that drainage basin could be utilised as public open space as denoted by the document "Drainage Basin in POS Area Details (5 of 5)". This is because it would need to be fenced off from public access due to the shown steepness on the supporting plan. As such, this SuDS feature only has a visual value and this is only to a very limited portion of the site.

Standard 5: Biodiversity
The SAB is unable to determine if Standard 5 can be met by this development due to a lack of a full Drainage Strategy.

Standard 6: Construction, Operation and Maintenance
The SAB is unable to determine if Standard 6 can be met by this development due to a lack of a full Drainage Strategy.

Outstanding Issues on the Site

1. The site layout has changed significantly since that assessed by the Flood Consequence Assessment (FCA) submitted in support of the outline planning permission for the site. A full Flood Consequence Assessment (FCA) should be submitted to the LPA for review to ensure that the layout is appropriate given the flood risk which has been presented on site.

2. Further investigation work should be carried out into the connectivity of the watercourse crossing the development site. Any drainage from A541 Mold Road or beyond to the site should be disproven to ensure that any development further severing the watercourse does not create any flood risk to communities upstream of this system.

3. A full drainage strategy should be submitted for review by the LPA before the application for the application for reserved matters can be resolved. This is because the layout is likely to be subject to change following an application for SuDS Approving Body (SAB) approval.

4. The infiltration tests supporting the use of infiltration on the development site were carried out in 2017. The SAB will only consider infiltration testing which has been carried out in the last five years. As such, infiltration testing will need to be undertaken again before this layout can be confirmed as more SuDS features would be required should the development need to go down the discharge hierarchy.

Proposed Conditions
Given the above concerns raised by the LLFA, we would like to impose the following conditions on the development:

1. No construction shall occur within 10 m of the ordinary watercourse.

   Reason: To maintain the integrity of the natural watercourse channel so that it can be used as storage in the event of a culvert blockage scenario and to preserve the channel as a natural asset to the development site.

Conclusion

Overall, the LLFA is unable to support this application due to the positioning of residential dwellings and critical attenuation structures in inappropriate flood risk zones. The LLFA, in its role as a SAB, also perceives that layout changes will need to be made in order for the development to obtain SAB approval.

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