

Eich Cyf/Your Ref: P/2023/0593

Ein Cyf/Our ref: N/A

Dyddiad/Date: 01/03/2024

Gofynner am/Ask for: Cathryn Hughes

Rhif Cyswllt/Contact No: 01978 729639

E-bost/E-mail: flooding@wrexham.gov.uk

Dear Matthew,

Site Address: Land at Lower Berse Farm, Bersham, Wrexham, LL14 4HP
Site Description: Outline Application for Erection of 1520 Dwellings (Appearance, Landscaping, Layout and Scale Reserved)

I am writing to you to reiterate the concerns that the Flood and Water Management Team have surrounding the development of the land at Lower Berse Farm. Following the inclement weather that we have received since October 2023, it is clear that the flood risk to existing properties and to proposed properties is too great for us to support a development of this scale on this site without further mitigation.

On Site Flood Risk

The Flood and Water Management Team notes that the majority of the development sits in Flood Zone A for fluvial flooding. We have no objection to development in this flood zone. However, parts of the site are designated as Flood Zone C2 and Zone B on the NRW Development Advice Map. We object to any residential properties or supporting highway infrastructure being constructed in Zone C2 and would strongly advise against such construction in Flood Zone B despite the proposed mitigation measures outlined by the developer. This is because such flooding in these areas has been witnessed as recently as Storm Babet on 20th October 2023.

The Flood and Water Management Team have also reviewed the flood depths provided in the development scenario of 0.1% AEP plus 45% climate change despite this being a more extreme scenario. We note that flood water will be affecting two of the four spine roads. We would expect these to be clear of flooding in all scenarios presented by the developer, or for the spine roads to be in areas of no flood risk. In addition, this scenario appears to suggest that water stored in the flood storage area to the north east of the site would affect the secondary road in the northernmost section of Development Parcel A. Thus, the Flood and Water Management Team would like to request a reduction in the size of this development parcel so that the risk to infrastructure and properties is removed.

Alterations to the Unnamed Ordinary Watercourse

The Flood and Water Management Team feel that the information included in this application is insufficient to determine if such changes to the channel of the unnamed ordinary watercourse are acceptable. We advise the developer that any changes made to the watercourse would need to receive an Ordinary Watercourse Consent from the Flood and Water Management Team.

The Flood and Water Management Team hold specific concerns relating to the easternmost access route to the site. To accommodate this access, the unnamed ordinary watercourse will need to be culverted further and six 300 mm pipes will need to be installed to connect the inlet of this culvert with the existing floodplain. It is not clear how this floodwater will then return to

the ordinary watercourse as it is known to sit on the undeveloped land for a number of days following a rainfall event. We would like to see more information on the mechanism of removing this flood water from the storage area.

In addition to the above, the Flood and Water Management Team note a further two roadways which cross the unnamed ordinary watercourse. We would like to request that the developer includes oversized box culverts at these crossing or considers the use of bridges. This will ensure that the flow of water is not impeded at any point in the development and will reduce the likelihood of blockages which could cause flooding to nearby properties and secondary roadways.

Off Site Flood Risk

The Flood and Water Management Team hold substantial concerns about the impact that this development will have on existing flooding to the A525 Ruthin Road. The Flood Consequence Assessment notes that there will be an increase in the depth of flood water on A525 Ruthin Road to 90 mm or less. We do not consider this to be a safe water depth on an arterial route in and out of the city of Wrexham. In addition, the current flooding does affect properties in the Pentre Bach estate downstream of the proposed development. Road closures during rainfall events also prevent access via the A525 to the nearby Wrexham Maelor Hospital. Under Section 100 of the Highways Act 1980, Wrexham CBC as a Highways Authority and a Lead Local Flood Authority have the right to protect the highway from flooding via the creation of a bund or barrier to divert surface water back on to the development site. We note that there is an existing bund which acts to hold surface water within the development site. If it we deem it necessary, this bund will be extended. Indeed, the Flood and Water Management Team are already considering this option to protect the highway.

In addition, testimony to the Flood and Water Management Team suggests that the bridleway which runs across the middle of the development site can funnel water onto Homestead Lane. This has been known to impact the traveller site on the lane and also necessitated the creation of a bund on the ground of Ysgol Clywedog to protect the school pickup area from flooding. We ask that the developer considers the risk of this runoff at the road crossings of this bridleway. The developer should liaise with the Public Rights of Way Team in Wrexham Council Environment and Technical Department for any mitigation measures that could be included to address this issue.

Highways

It is not the place of the Flood and Water Management team to comment on Highways issues. That is within the remit of our colleagues in Development Control. However, we feel the need to make an important point about the highways drainage serving A525 Ruthin Road. The current camber of the road supports the use of road gullies on only one side of the carriageway as this is sufficient to remove surface water. If it is the intention of the developer to add to the drainage system as a result of changing the road layout and camber, the cost of additional drainage will need to be covered by the developer.

SAB Approval

Under Schedule 3 of the Flood and Water Management Act 2010, as enacted by the Welsh Government in January 2019, this development will require approval from the SuDS Approving Body (SAB) before construction can begin. The Flood and Water Management Team would encourage the developer to engage with the team at the earliest opportunity to avoid delay. We note that the climate change requirement for all SAB applications is an additional 40% on top of the 1 in 100 year rainfall event. At this time, we are unable to comment on the suitability of the proposed SuDS features as a clear plan has not been provided.

The Flood and Water Management Team note that the development is proposed to be phased over a number of years. SAB approval is only valid if the construction is completed within 5 years of the approval date. With this in mind, we would be willing to accept the SAB application to be submitted in phases. However, it must be made clear in each application how each phase will interact with the drainage in the downstream phase. This will allow us to determine the overall suitability of the system.

Wastewater Treatment Works

The Flood and Water Management Team strongly objects to the proposed inclusion of a wastewater treatment works in this location. Whilst the team are not the responsible risk management authority for sewerage flooding, or the main river, we would be greatly concerned about the consequences of its failure and the impact that the treated effluent will have on the health of the ecosystem of the River Clywedog. We feel that a better destination for the foul sewerage would be the combined sewer which already runs across the development site if Dwr Cymru Welsh Water are able to accommodate this.

If you require any further information, or wish to seek clarity on any of the above, please get in touch with the team via flooding@wrexham.gov.uk.

Yours sincerely,
Cathryn Hughes
Flood and Water Management Team
Environment and Technical Department
Wrexham County Borough Council