MEMORANDUM

From: Chief Officer, Environment & Technical

Your Reference: P/2025/0598

To: Chief Officer, Economy and Planning

Our Reference: N/A

FAO: Matthew Philips

Date: 21/11/2025

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL
RESERVED MATTERS PERSUANT TO OUTLINE PLANNING PERMISSION P/2019/0923 (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE) – ERECTION OF 184 DWELLINGS (PHASE 2A/2B)

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 Phases 2a and 2b of this development which includes the northern and easternmost portion of the development site.

The LLFA is **UNABLE TO SUPPORT** the discharge of the reserved matters until further information has been provided.

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 observes that this development site is not impacted by fluvial flooding which is also known as riverine flooding. As such, the site sits in Flood Zone 1 for this type of flooding. However, the LLFA has concerns about the layout submitted for approval as a number of properties are shown to be located in pluvial flood risk areas. This is flooding from surface water runoff or ordinary watercourse sources. The areas of pluvial flooding are shown within the approximated phased site boundaries in Figure 1 below.

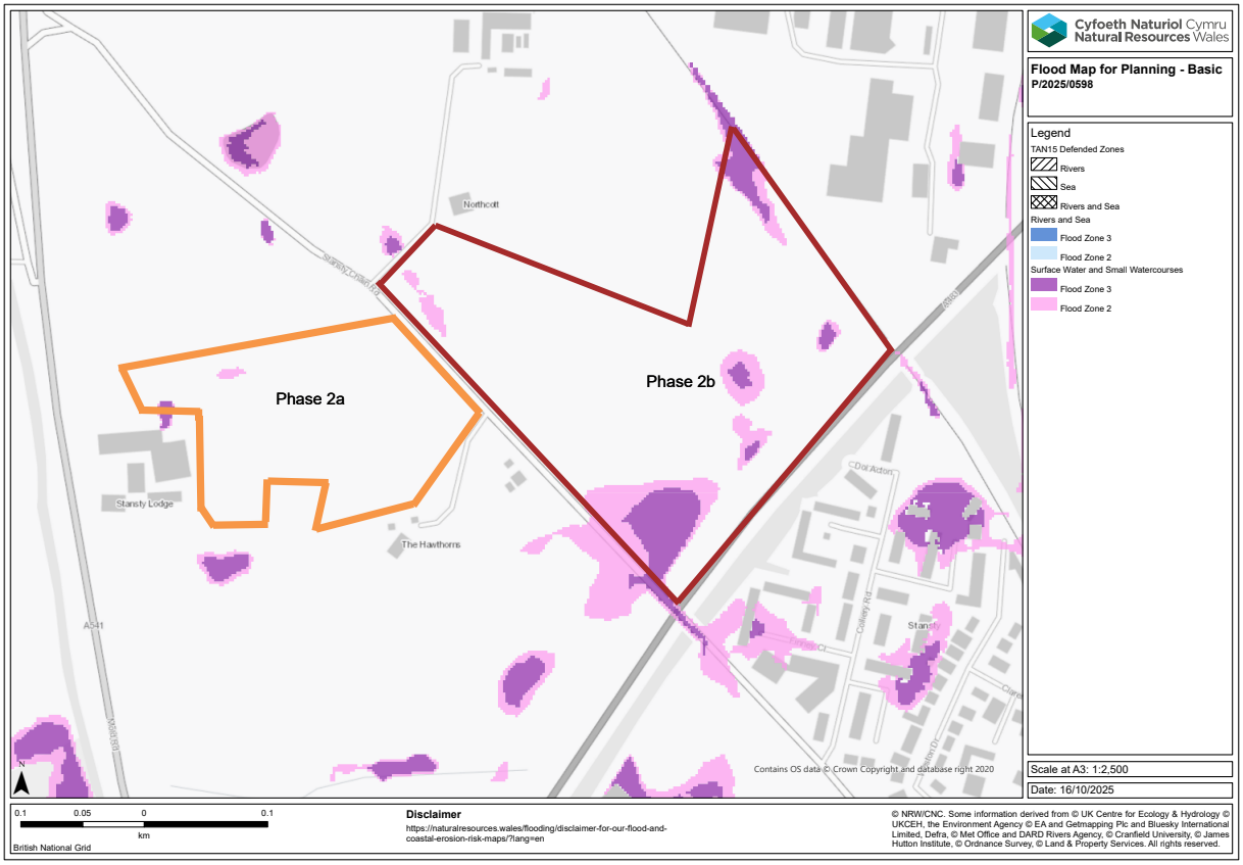


Figure 1: An overview of the Flood Map for Planning for the development site with the approximate planning boundary showing Phase 2a in orange and Phase 2b in red. Areas of pluvial, or surface water flooding, are shown in purple with higher levels of risk being illustrated by the darker shades.

The LLFA notes that Phase 2a of the development is largely unaffected by flooding. Indeed, we note that the area some as Flood Zone 2 only to the north of the development will likely fall within the boundaries of proposed highways. As such, it will be dissipated by formal drainage and landscaping. However, it is unclear how the developer proposes to deal with the area of Flood Zone 3 to the west of the development. It is noted by the LLFA that this appears to be a flow path from within the grounds of Stansty Lodge. It is noted that this should not be blocked by the development in order to prevent flooding to an existing property. The LLFA advise that this flooding should be investigated further and considered in a flood consequence assessment (FCA) as it would not be favourable to locate properties in a way that may block this flow path as is suggested in the submitted site layout.

Of most concern to the LLFA is the area of flood risk bordering Stansty Chain Road and the embankment of the A483 in the southern corner of Phase 2b. The LLFA observes that this is a Flood Zone 2 and 3 area for surface water flooding. As per TAN 15, residential development is highly vulnerable and should not be located in these flood zones as it has been in the proposed site layout plans. It is the opinion of the LLFA that this flood zone will not be removed through the installation of formal drainage. This is because the flooding is a result of the barrier created by the A483 embankment preventing overland flow. This then gathers in the topographical lows in the southern corner of the site.



Figure 2: A view of the development site taken from the Public Right of Way footpath numbered Gwersyllt 29. The photograph views the development looking southwards towards Phase 2b. The view illustrates that the development site in its greenfield state is cambered towards the railway line which sits at a lower elevation.

The LLFA is also concerned about the potential for increased flood risk affecting third party infrastructure. We note that a number of houses are located in an area of Flood Zone 2 and 3 for surface water flooding to the north-north east of the development site which would be against the development placements outlined in TAN15. It is also noted that changes in ground level may displace surface water runoff from this development on to the nearby railway line. We note that Network Rail should be consulted on the suitability of these proposals before determination. In addition to the above, it is suggested that detailed cross-sections of the proposed site levels are submitted for review in any drainage strategy accompanying this application or the subsequent SuDS Approving Body (SAB) application.

Finally, the LLFA note that the attenuation basin which serves Phase 2b is positioned in a flood risk area. As per the Statutory Standards for Sustainable Drainage System, SuDS features which have an attenuation function should not be located in a flood risk zone.

Given the flood risks highlighted above, the LLFA believe that a new Flood Consequence Assessment (FCA) should be submitted. This document should be written in compliance with the updated TAN 15 which was implemented from the 31st March 2025.

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 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 the SAB is yet to receive an application in relation to this site and that a full drainage strategy has not been submitted. Whilst we would request that the drainage strategy is submitted to the LPA before any final determinations on this application, the SAB does note some immediate issues with the proposed drainage that will likely result in layout changes following the formal SAB application.

Drainage Strategy Overview
It is noted that Phase 2a proposes to drain via a piped system to a single end-point infiltration basin. This is the same method which is used to drain the majority of Phase 2b. However, the SAB notes that the southern-most area of Phase 2b is drained to geo-cellular crates which discharge via infiltration.

It is unclear how the individual properties and the private highways drain on both phases. For the purposes of this consultation response, we will assume that these are on separate systems given that the drainage for these is not indicated on the drainage plan submitted for the approval of reserved matters. However, the SAB considers that the concerns outlined below would be exacerbated if the final design does take the drainage from the properties and private drainage to the infiltration structures.

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.

At this time, it is assumed that the developer intents to infiltrate all of the water on site to the infiltration basins and soakaway crates shown on the Drainage Strategy plans. 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 favourable infiltration rates are returned 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.

Despite the above, it is noted that the location of the infiltration basin and the soakaway attenuation crates serving Phase 2b are located in close proximity 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 regard 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 at least 5 m away from the bottom of the road embankment supporting the A483.

In regard to the drainage of properties, the SAB believes that property-level soakaways and permeable driveways should be considered wherever possible. This appears to be the intenmtion of the developer as indicated by this drainage having been omitted from the drainage strategy plans. These features will remain under the private ownership of the property owner once sold.

Standard 2: Surface Water Runoff Hydraulic Control
It is noted that the infiltration basin and soakaway crates serving parts of Phase 2b are located within a flood risk zone. The SAB notes that SuDS features critical to storage within a drainage system should be located in areas of the site which remain flood free.

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 has no comments to offer in relation to Standard 4.

Standard 5: Biodiversity
The SAB notes that the infiltration basin serving the majority of Phase 2b forms a part of the Ecological Area for Wildlife. Whilst the aim of Statutory Standard 5 is to incorporate biodiversity into the SuDS features used, the SAB is concerned that maintenance activities to this feature would have a detriment to the wildlife that has been encouraged. It is also likely that encouraging the growth of wildlife in this area would lead to a reducing capacity of the infiltration basin over time. This could be from accumulation of debris or through self-seeding woody vegetation reducing the volume of attenuation available.

It is noted that the above concern would be reduced if additional SuDS features were included upstream. However, due to the single-end point nature of this system, any capacity issues would be considered critical to sustained capacity and functioning of the system. The use of multiple SuDS features which all promote biodiversity would also create a more functional wildlife corridor through the development.

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 LLFA considers that a Flood Consequence Assessment is needed to explore all of the flood zones given the placement of residential dwellings in these areas. In addition, some of the flow paths on site could pose risk to third parties if the development displaces water from the site. A new FCA document should be written in compliance with the updated TAN 15 which was implemented from the 31st March 2025.

2. The application lacks the submission of a comprehensive drainage strategy which would be used to support the layout submitted for both Phase 2a and Phase 2b. It is the opinion of the LLFA, in its role as a SAB, that the development layout would need to change to be in compliance with the Statutory Standards for Sustainable Drainage Systems as published by the Welsh Ministers.

3. 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.

Conclusion

In conclusion, the LLFA is **UNABLE TO SUPPORT** the discharge of reserved matters relating to the site layout for this development. This is due to the positioning of residential houses and critical drainage attenuation within flood risk zones. In addition to the above, the LLFA, in its role as a SuDS Approving Body, is concerned that the layout would not satisfy the Statutory Standards for Sustainable Drainage Systems based on the layout provided. However, we acknowledge that we cannot make any concrete conclusions in this regard because a full formal drainage strategy has not been submitted for review and a SAB application has not been received by the team.

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