

MEMORANDUM

From: Chief Officer, Environment & Technical

Your Reference: P/2024/0155

To: Chief Officer, Economy and Planning

Our Reference: SAB/PRE/2023/1101

FAO: Matthew Phillips

Date: 02/12/2025

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL:

INSTALLATION AND OPERATION OF AN ENERGY STORAGE SYSTEM (ESS) INCLUDING ENERGY STORAGE UNITS, SUBSTATION, SITE ACCESS, CABLE CONNECTION, LANDSCAPING AND ANCILLARY INFRASTRUCTURE

LOCATION:

LAND NORTH OF BRONWYLFA ROAD RHOSTYLLEN WREXHAM

We refer to your consultation as per the email dated 13/03/2024 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.

This development is noted to be a site for an energy storage system including a substation and battery storage units. The LLFA note that the development in question would be classed as especially vulnerable industrial development. As such, it would be classified as highly vulnerable development under TAN 15. This does mean that this development type should be directed outside areas which are prone to flooding.

The LLFA would like to **RAISE NO OBJECTION** regarding the application submitted to the Local Planning Authority (LPA). However, we do consider that a justification of this position should be provided to support the LPA in its determination of this 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 notes that the Flood Map for Planning has been updated since the application was submitted. As such, we will make our assessment based on the current flood map as shown by Figure 1.

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 this 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.

The LLFA notes that the developer has engaged with the team for pre-application advice. This was provided under the reference SAB/PRE/2023/1101. We note that we have no concerns to raise with the proposals which we would like to raise outside of the SAB process. It is the belief of the LLFA that the development will achieve full SAB approval once a submission has been made.

Conclusion

In conclusion, the LLFA do not have cause to object to the development as submitted to the LPA. Whilst we note that areas of flood risk have been identified on the site, we consider that the development is conscious of this and has developed an appropriate strategy to manage this. We do not consider that the highly vulnerable elements of this development would be at risk, nor do we consider that this development will pose a flood risk to existing people and property.

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