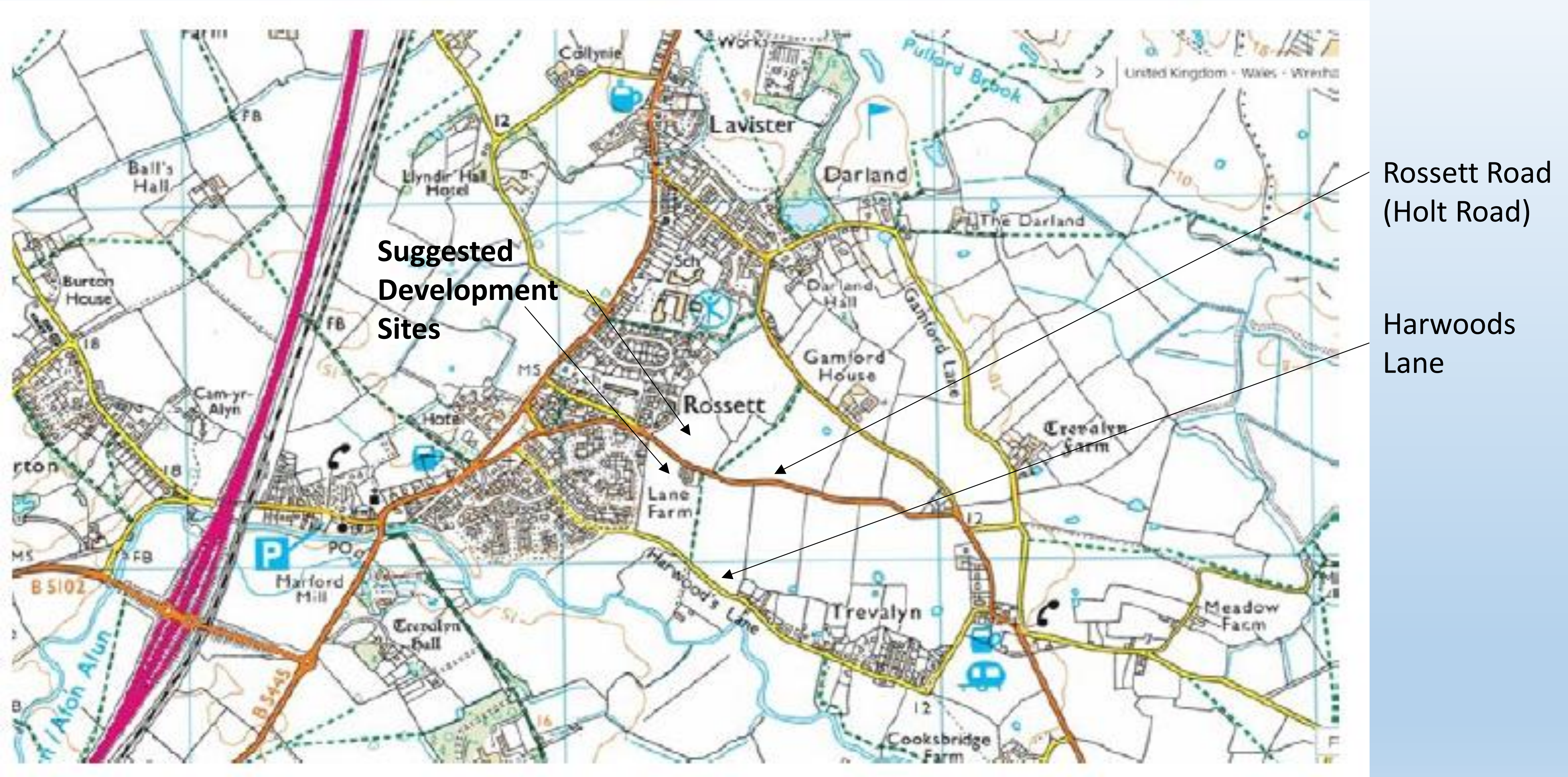
Wrexham Local Development Plan 2013 -2028

Housing Development Implications for Rossett

The Local Development Plan (LDP) published on the 5th April 2018 includes land North & South of Rossett Road (137 Units).

Any responses to the LDP must be submitted before the 31st May 2018

The following slides attempt to illustrate that the inclusion of land North & South of Rossett Road (137 Units) is seriously flawed and the Wrexham Council LDP fails to take into account its own and National Policies by including this site(s) in its Housing Development Proposals



Suggested
Development
Sites
Rossett Road
(Holt Road)
Harwoods
Lane
Lavister
Darland
The Darland
Darland Hall
Pulford Brook
Gamford House
Gamford Lane
Rossett
Lane Farm
Harwood's Lane
Trevalyn Farm
Trevalyn
Meadow Farm
Cooksbridge Farm
Trevalyn Hall
Marford Mill
PO
Ball's Hall
Burton House
Cam-yr-Alyn
Llyndir Hall Hotel
Sch
B 5102
B5445
Afon Alun
United Kingdom - Wales - Wrexh

The most relevant page to Rossett in the LDP is Page 113

Policy H1 Housing Allocations

Key Strategic Sites
Tier 1: Primary Key Settlement
KSS1: Land at Lower Berse Farm, Ruthin Road, Wrexham (policy SP4)
KSS2: Land East of Cefn Road, Wrexham (policy SP5)

Non Strategic Housing Allocations:-
Tier 1: Primary Key Settlement - Sites 1 to 3
Tier 2: Key Settlement - Sites 4 to 10
Tier 3: Local Service Centres –Sites

11. Land South of Berse Road, Caego, New Broughton (25 units)
12. Land at Gatewen Road, New Broughton (127 units)
13. Land Adjacent to Sycamore House, Wrexham Road, Holt (35 units)
14. Land off St Mary's Avenue, Overton (40 units)
15. Land at The Grange, Penley (25 units)
16. **Land north and south of Rossett Road, Rossett (137 units)**

Wrexham Council have a number of key policy documents or published objectives and some of the most relevant of these are mentioned below and require comment in the context of the inclusion of land North & South of Rossett Road:

- **Local Flood Risk Management Strategy**
- **Health and Wellbeing**
- **Green Barriers**
- **Climate Change**
- **Development Management Considerations**

Wrexham Borough Council Stated Commitment
(Under Section 10 Flood and Water Management Act 2010)

Wrexham County Borough Council as a Lead Local Flood Authority is committed to ensuring improvements to the quality of life, providing a place that is economically prosperous, a place that is safe place which values citizenship, community spirit and social responsibility. A place that looks after it's built and natural surroundings and a place that cares for people's health. The inclusion of the outcomes within the Council Plan will ensure that the Council's priorities of People, Place and Economy around the central organising principle of sustainable development.

The principles of this approach are important because they demonstrate the need to look at flood risk management activities more strategically and more holistically. This is achieved in two ways, firstly by general principles of the approach and the strategic environmental assessment of the outcomes and measures against the Strategic Environmental Assessment scope and objectives for the County Borough.

Flood Risk Assessment across Wrexham County Borough (Local Flood Risk Management Strategy 2012)

Objectives

The sustainable development approach and delivered outcomes are closely aligned to the National Flood and Coastal Risk Management Strategy's (2011) (NCRMS) sets out four overarching objectives for the flood risk management in Wales;

NFCRMS 1: Reducing the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion;
NFCRMS 2: Raising awareness of and engaging people in the response to flood and coastal erosion risk;
NCFRMS 3: Providing an effective and sustained response to flood and coastal erosion events; and
NFCRMS 4: Prioritising investment in the most at risk communities.

These objectives set out eleven sub objectives and measures which are applicable at a local level through the local Flood Risk Management Strategy and set out further within the implementation section.

Figure 1.6 Proposed Objectives and Measures of the Local Flood Risk Management Strategy (LFRMS):

National Flood and Coastal Risk Management Objectives (Wales)	Wrexham County Borough Council, Council Plan 2012-16 Economy People and Place and Strategic objective : Organisation	Council Plan Outcomes	Wrexham Strategic Environmental Assessment Objectives	LFRMS Measures (L1-11)	(Short, Medium, Long Term) Short -5 years Medium 5-10 years Long Term > 10 years	Indicators	Risk Management Authority/ Relevant Stakeholder
NFCRMS 1: Reducing the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion;		People: PE3, PE4, PE5; Place PL1, PL2, PL3, PL4	SEAO1. To protect human health and wellbeing;	L1. Improve the level of understanding of local flood risk and promote a strategic approach to flood risk management within the Lead Local Flood Authority, Flood Risk Partners and Stakeholders;	Medium Long	Levels of flood risk deprivation within Welsh Index of Multiple Deprivation. Level of baseline information on flood risk. Strategic performance monitoring outputs of the LFRMS Measures within the Council Plan	LLFA, Highways Authority, Planning Authority, Environment Agency, Water Companies
		People: PE3, PE4, PE5; Place PL1, PL2, PL3, PL4	SEAO2. To minimise the risk of flooding and ensure new development is located outside TAN 15 zones C1 and C2 and that all developments apply the principles of sustainable drainage and water sensitive design;	L2. Promote a successful development plan and management approach to local flood risk issues to address issues of urban creep, resilience, water sensitive design and sustainable drainage systems	Medium/ Long	Numbers of properties, key infrastructure and community buildings at risk from flooding, from different sources; Reduction in flood risk to existing properties and business. Flood risk issues informing local development plan allocations and development plan briefs. Number of developments incorporating sustainable drainage schemes, to an adoptable and maintained standard.	LLFA, Highways Authority, Planning Authority, Environment Agency Water Companies
				L3. Establish an effective asset management register which includes designated structures and risk based approach to maintenance schedules.	Long	Annual review of existing structures. Number of development schemes per year which incorporate sustainable drainage systems, to an adoptable and maintained standard. Total number of flood risk assets on the register each year. Annual review of maintenance regimes. The number of maintenance regimes reviewed each year. The number of assets identified through investigation reports.	LLFA, Highways Authority, Environment Agency, Water Companies
		People: PE3, Place PL1, PL2, PL3, PL4 and Economy E2, E1 and E3	SEAO3. To ensure the potential impact of flooding on existing and future critical infrastructure is minimised;	L4. Effective collection and collating of flood event information through the use of geographical information systems, and databases to identify, and prioritise sources and consequences of flood risk within communities	Long	Number of investigation reports published each year.	LLFA, Highways Authority, Planning Authority, Environment Agency Water Companies, Civic Canal and River Trust, Rail track and North Wales trunk Road Agency;
NFCRMS2: Raising awareness of and engaging people in the response to flood and coastal erosion risk;		Place PL2, PL4	SEAO4. To protect enhance biodiversity and nature conservation in Wrexham County Borough	L5. Promote and develop scope for natural approaches to both flood risk management and land use management, so that source control measures, flood attenuation and storage (sustainable drainage systems) are utilised to reduce surface water run off.	Long	The number of rural sustainable drainage systems used or developed per year. Area of land used to temporarily store water away from high risk areas each year. Number of schemes implemented to reconnect rivers to floodplains. Number of restored or area of restored peat bogs. Floodplain areas of the borough reforested. Number of green roofs. Amount of permeable paving areas for residential, business and industry across the borough. Number of surface water attenuation ponds. Number	LLFA, Highways Authority, Planning Authority, Environment Agency Water Companies, Civic Canal and River Trust, Rail track and North Wales trunk Road Agency, Rural Development Agencies, Clwyd Powys
		Place PL2, PL3	SEAO5. To protect the best quality soil and enhance the quality and character of the landscape; 6. To maintain and enhance water resources and				

			water quality;				
		People PE3, PE4; Place PL2, PL4	SEAO6. To maintain and/or enhance the character of townscapes, cultural heritage and assets within Wrexham County Borough;	L6. Adopt a non culverting policy approach to ordinary watercourses	Byr	Number of ordinary watercourse consents granted per year. % of development on previously developed land. Number of wards within 20% most deprived wards with access to services/employment. Ha of open space deficit within the Borough. % of accessible green space as defined by CCW and Green Network Strategy and % of naturalness within the County Borough improved through flood management approaches or projects. Number of investigation reports published each year, where practicable. The number of assets identified through investigation reports.	
				L7. To investigate flood events	Medium		
		People PE4, PE3; Place PL1, PL2, PL3, PL4 and Economy E1, E2 and E3	SEAO7. To maintain and enhance water resources and water quality				
		People PE4, PE3; Place PL1, PL2, PL3, PL4 and Economy E1, E2 and E3	SEAO8. Protect and Enhance Wrexham's County Borough's Landscape and Visual Amenity;				
NCFRMS 3: Providing an effective and sustained response to flood and coastal erosion events; and **NFCRMS4:** Prioritising investment in the most at risk communities		People PE3, PE4, PE5; Place PL1, PL2, PL3, PL4; Economy E1, E2 and E3.	SEAO9. To adapt development to withstand the impacts if climate change;	L8. Promote greater level of community resilience, awareness and preparedness which encourages proactive and responsible maintenance of privately owned assets and flood defences	Medium	Number of key infrastructure providers registered to the Targeted Flood Warning System. The number of communities groups registered for Met Office and EA Warning systems; Number of investigation reports published each year. % of commercial or new buildings or refurbishments meeting BREEAM "very good" standard. % of homes new build and refurbishment achieving CSH very good standard. Number of properties that have installed property protection measures per year. Number of Community Plans held each year. The provision of quarterly area Flood Partnership Meetings each year.	LLFA, Planning Authority, Environment Agency and Water Companies North Wales Resilience Forum
				L9.Improve the response and recovery to flooding events by emergency response organisations, individuals and businesses	Long	Number of engagement activities with groups held each year. Council and agencies committed to training of EMRT Teams. Number of queries received from people on insurance issues relating to flood risk. Preparation and testing multi agency flood plans Review and development of Community Flood Plans.	LLFA, North Wales Resilience Forum and Environment Agency, Water Companies
				L10 Maximise opportunities for partnership working within the LLFA, flood risk partners and stakeholders	Long	Annual update of information onto the Community Risk Register. Number of engagement activities with groups held each year. Continuation and development of Flood-Coordination Group for North Wales. Identification of future partnerships and collaboration for Suds Approval Body (SAB) Annual monitoring of asset register. Improvements to baseline information collection and recording.	LLFA, North Wales Resilience Forum and Environment Agency, Water Companies
				L11 Identify projects and programmes which are affordable maximising capital funding from external sources.	Long		

The table shown in the previous slides is taken from Wrexham Council Local Flood Risk Management Strategy 2012 as the Lead Local Flood Authorities (LLFA). Key elements of this table are examined in further detail below:-

National Flood and Coastal Risk Management Objectives (Wales)

NFCRMS 1: Reducing the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion

Wrexham Strategic Environmental Assessment Objectives, LFRMS Measures L1 and L2 (Medium to long term 5 to 10 years) and Indicators to meet the above objective are shown next:-

Wrexham Strategic Environmental Assessment Objectives	LFRMS Measures (L1-11	Indicators
SEAO1. To protect human health and wellbeing	L1. Improve the level of understanding of local flood risk and promote a strategic approach to flood risk management within the Lead Local Flood Authority, Flood Risk Partners and Stakeholders	Levels of flood risk deprivation within Welsh Index of Multiple Deprivation. Level of baseline information on flood risk. Strategic performance monitoring outputs of the LFRMS Measures within the Council Plan
SEAO2. To minimise the risk of flooding and ensure new development is located outside TAN 15 zones C1 and C2 and that all developments apply the principles of sustainable drainage and water sensitive design;	L2. Promote a successful development plan and management approach to local flood risk issues to address issues of urban creep, resilience, water sensitive design and sustainable drainage system	Numbers of properties, key infrastructure and community buildings at risk from flooding, from different sources; Reduction in flood risk to existing properties and business. Flood risk issues informing local development plan allocations and development plan briefs. Number of developments incorporating sustainable drainage schemes, to an adoptable and maintained standard

The flooding events that have occurred this year 2012-2013 within the County Borough I have varied in size and caused different patterns of events. In April prolonged and heavy rainfall caused problems associated with surface water run off and river flooding alerts in Acrefair and Rossett. The events in July and August were associated with surface water flooding and flash flooding in urban villages of Gwersyllt, Gresford, Marford, Llay and Burton Green. In September, flooding events covered the borough causing surface water and river flooding to the Alyn and surrounding farmland around Holt, Farndon and Rossett.

The flood risk areas for Wrexham are listed in Figure 1.8 shows the PFRA squares in relation to the community council areas and shows how many properties, business or infrastructure could be affected. The table compares this information in relation to the EA Areas Susceptible to Surface Water Flooding and Flood Map for Surface Water, groundwater flooding areas, the historic flood outline and flood zones, canal flooding from Civic Canal and River Trust and sewer flooding from Welsh Water and the historical flooding data captured by the LLFA. The table also shows how these areas relate to the policy areas of the River Dee Catchment Plan and River Dee Basin Management Plan. Figure 1.9 will help identify the highest risk areas for the implementation of measures (L1-11) and forthcoming flood risk maps and flood risk management plans.

In Wrexham County Borough there were no areas identified as significant risk threshold with an affected population, greater than 5,000 people. Within the Wrexham County Borough Council Preliminary Flood Risk Assessment (PFRA) 2011[6], 20 1km square areas of 200 properties, 20 businesses or 1 critical infrastructure have been identified. These are areas which do not meet the statutory flood risk areas of 5,000 people but areas which are locally significant. These areas are concentrated around Wrexham, Llay Industrial Estate, Wrexham Industrial Estate and urban villages of Gwersyllt, Rhosllanerchrugog, Ruabon, Coedpoeth, Cefn Mawr, Acrefair, Chirk and Glyn Ceiriog, Ceiriog Valley. This local threshold will continue to form the basis of the LFRMS supported by continuing collection of information on local flood events.

The PFRA (2011) 1km2 squares show that local flood risk could potentially affect 20,696 properties. The Environment Agency maps on surface water show a total number of 451 properties within areas susceptible to surface water flooding. The Environment Agency Flood map for surface water shows that 1922 properties could potentially be affected by 1 in 30 flood event, and 5312 properties are shown at risk from the 1 in 200 flood map for surface water. To date, the County Borough has received 383 flooding incidents.

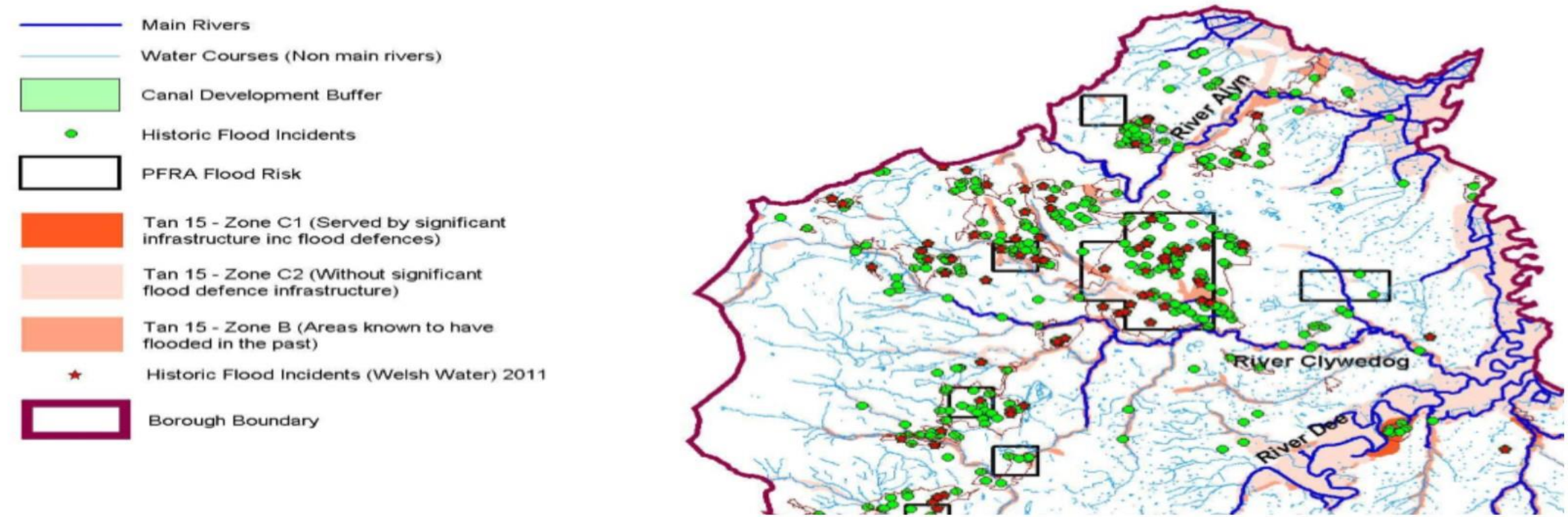
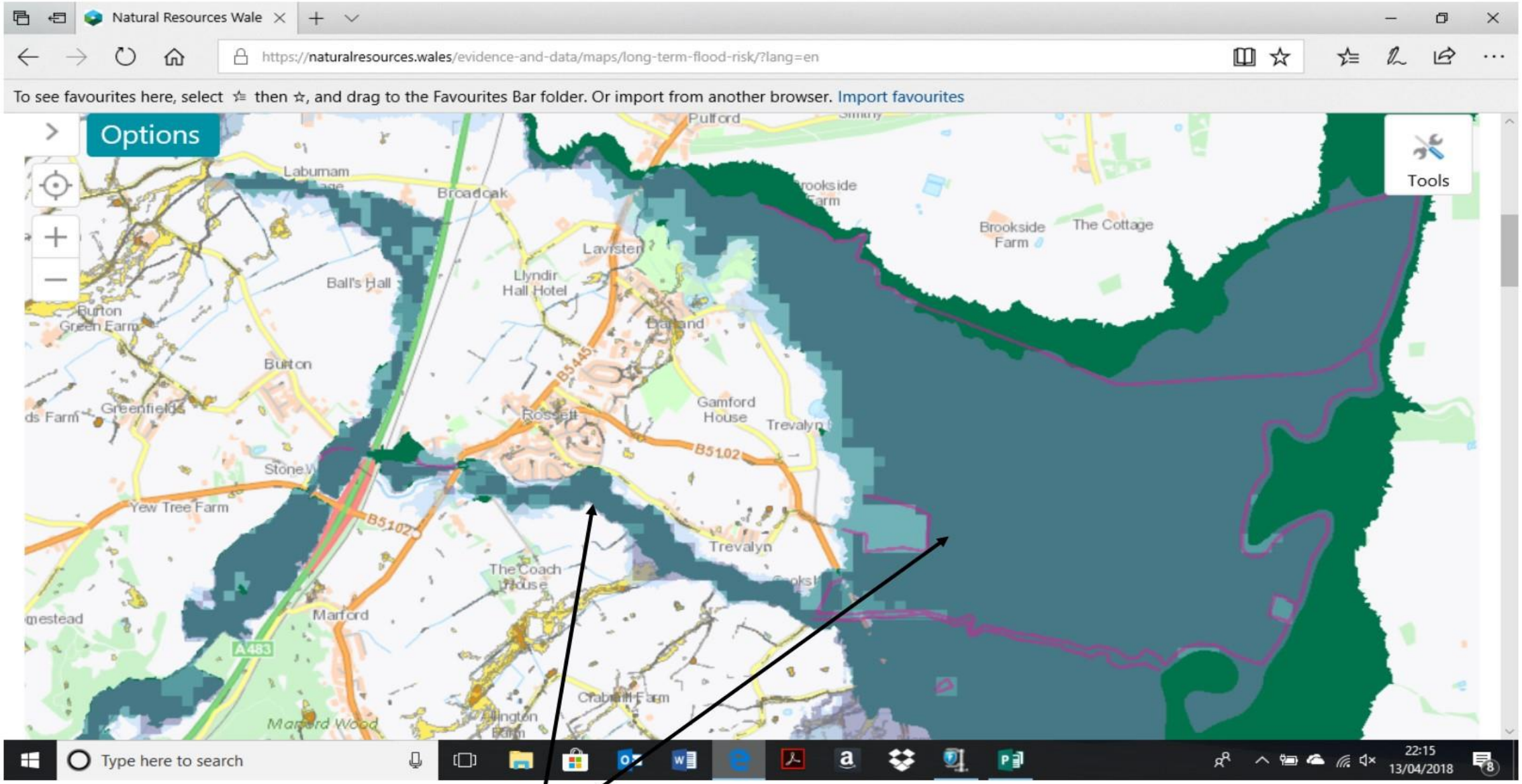


Figure 1.8 Flood Risk Assessment across Wrexham County Borough (Local Flood Risk Management Strategy 2012)

The following 4 slides have been produced using Natural Resources Wales (NRA) and are centred on Rossett

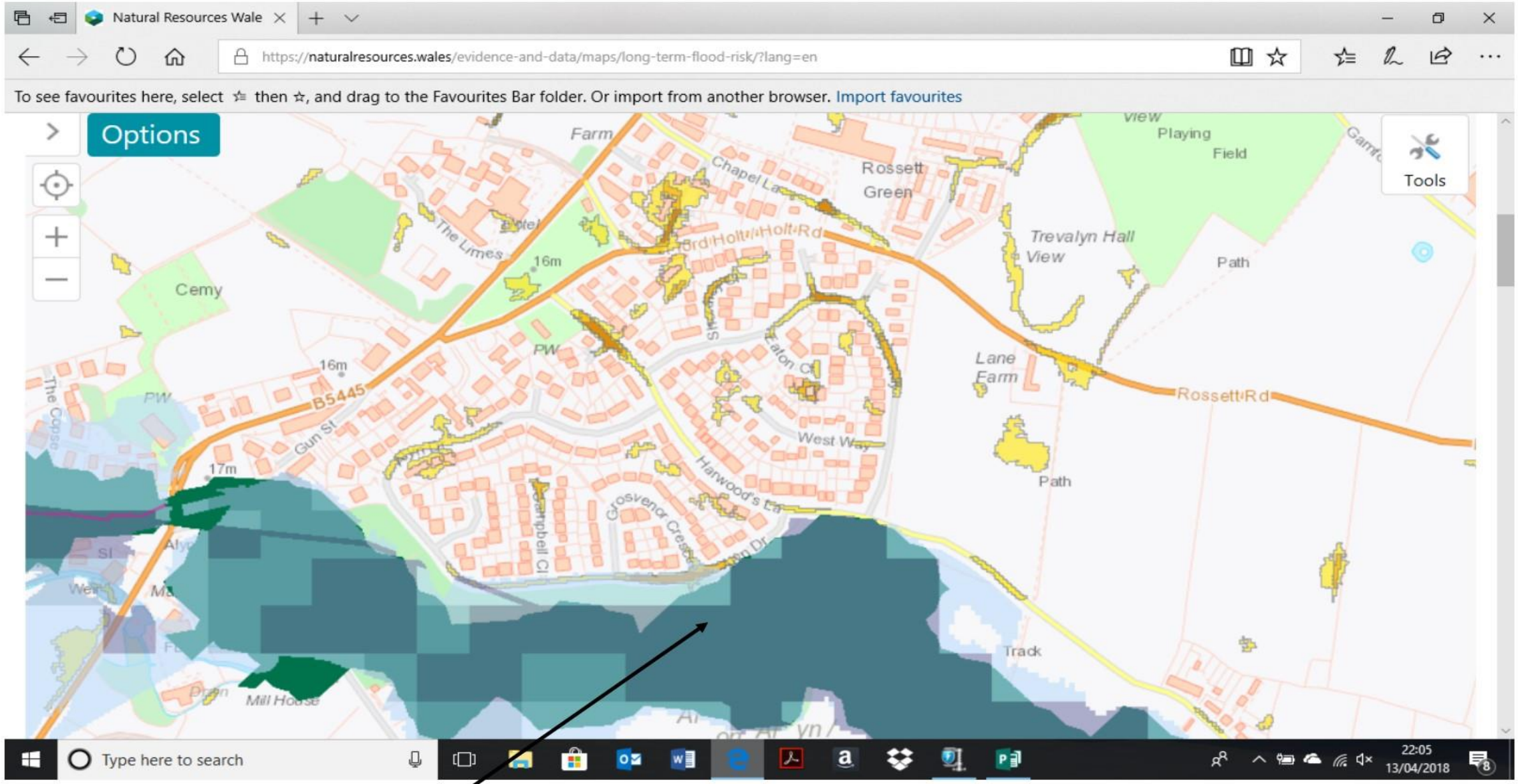
Careful examination of the maps shows

1. flood plain information for the River Alyn/River Dee
2. that they are not entirely accurate and do not display fully areas of flooding from the River Alyn in recent years.
3. they display areas of historic flooding on the suggested site(s)



River Flood Risk Area

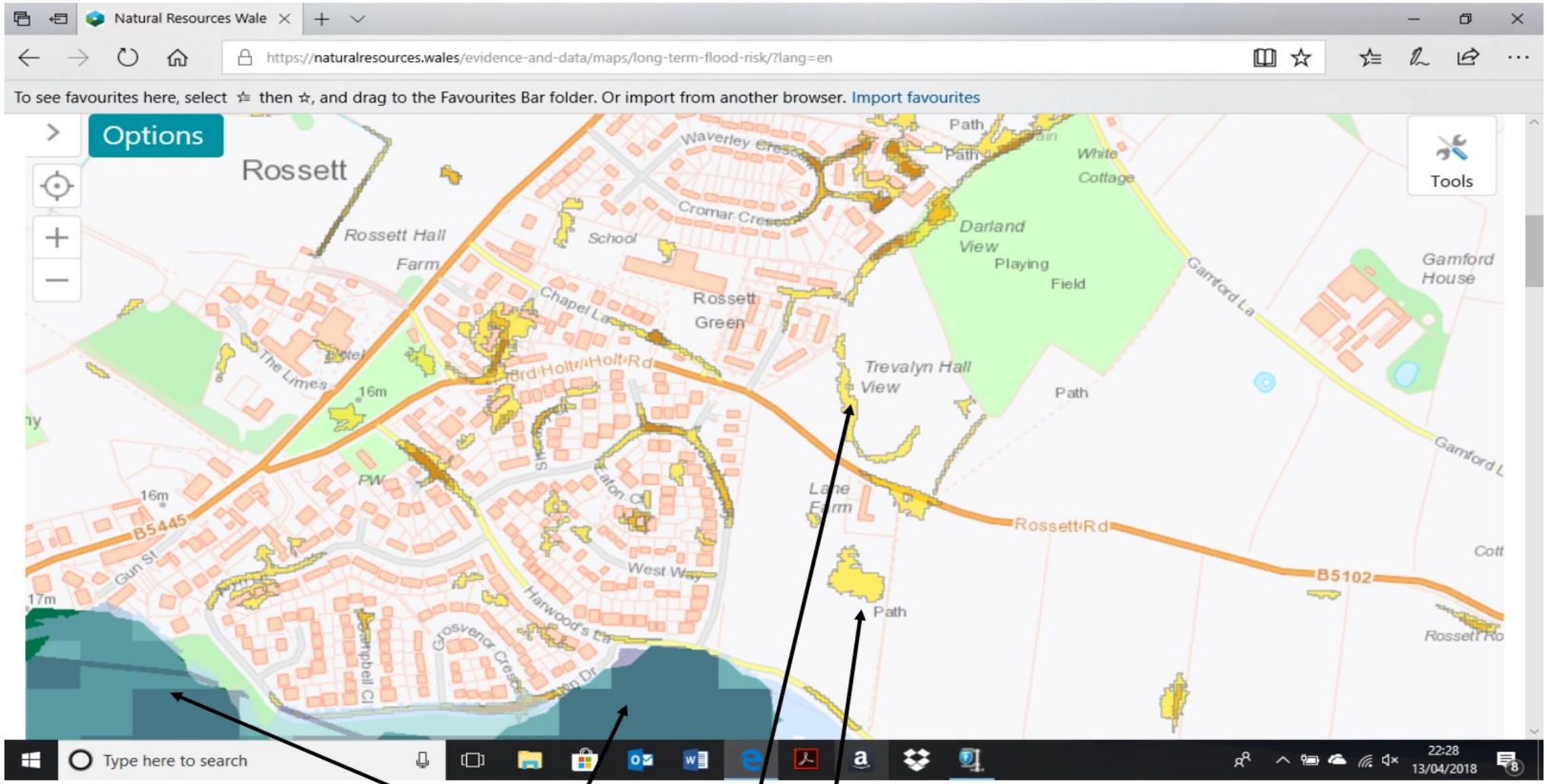
Information Source NRA Wales



Surface Water Flooding Risk :-

Flood Risk—River Alyn

Information Source NRA Wales



Surface Water Flooding Risk

Flood Risk—River Alyn

Information Source NRA Wales

Flood Risk Map - Rossett

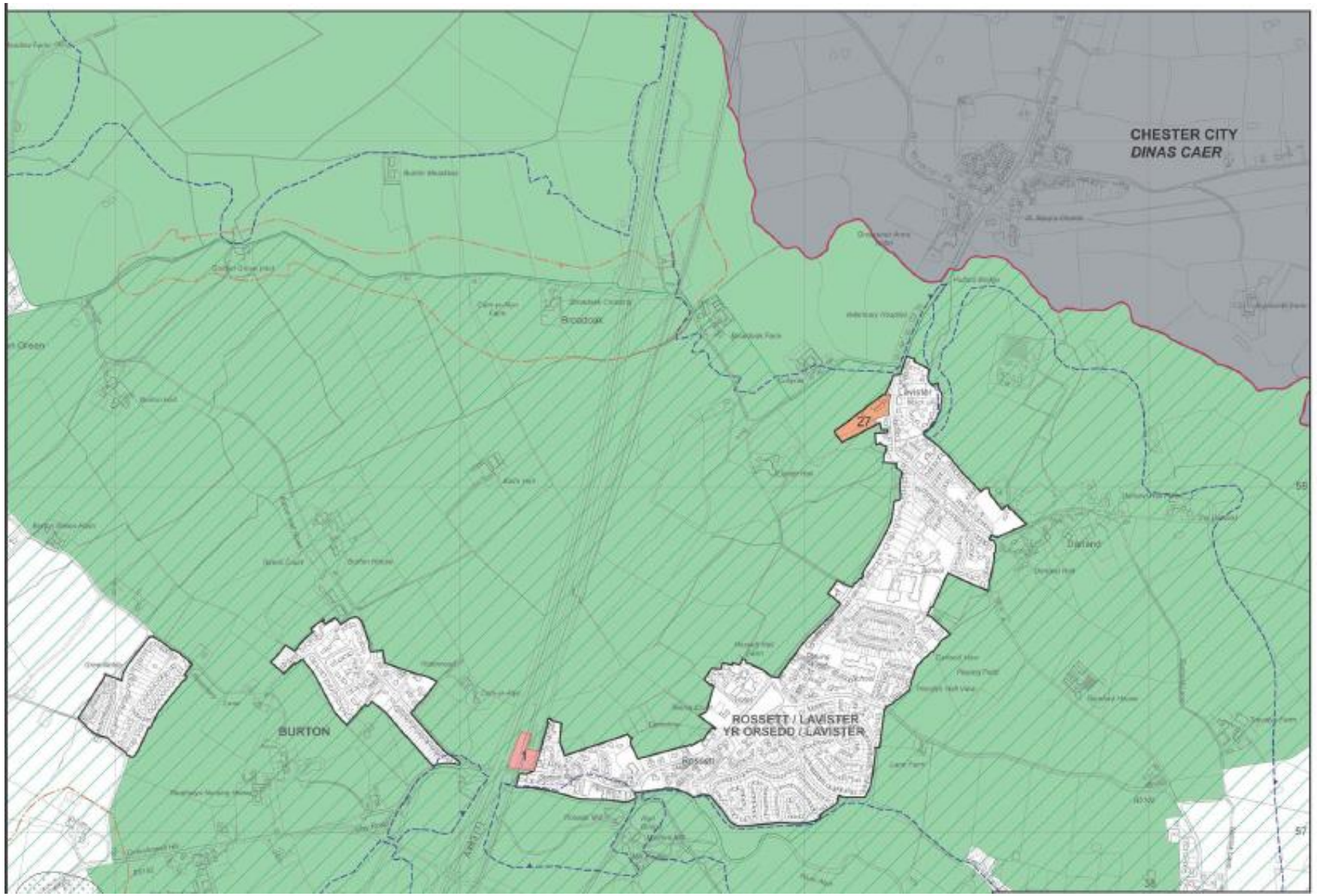
Developed by Cartographics, Welsh Government

Green Barrier Designation

The following slide shows the Green Barrier around Rossett included the earlier UDP.
The inclusion of land North & South of Rossett Road clearly encroaches on this policy.

Special Landscape Area Policy (EC5).

The Wales Policy EC5 requires developments to conserve or enhance the existing landscape. The inclusion of the site(s) does not support this policy and encourage the creep of development into the countryside.



Inset Plan Notation / *Nodiadau Map Mewnosodiad*

- County Boundary / *Ffin y Sir*
- Settlement Limit / *Ffin Anheddiad* - PS1
- District Shopping Centre / *Canolfan Siopa Cylch* - S5
- Employment / *Gwaith* - E1
- Commercial Offices / *Swyddfeydd Masnachol* - E7
- Green Barrier / *Ffin Gwyrdd* - EC1
- Special Landscape Area / *Ardal Tirlun Arbennig* - EC5
- Biodiversity Conservation / *Cadwraeth Bioamrywiaeth* - EC6
- Conservation Area / *Ardal Cadwraeth* - EC7, EC8
- Development and Flood Risk / *Datblygiad a Perygl Llif* - EC12
- Housing / *Tai* - H1
- Railway Station / *Gorsaf Rheilffordd* - T3
- Protection of Mineral Resources / *Diogelu Adnoddau Mwynau* - MW9
- Minerals Buffer Zone / *Cylchfeydd Rhagod Mwynau* - MW11

Other Settlement Policies / ***Polisiau Anheddiad Eraill.***
PS3, PS4, PS5, PS6, PS7, PS8, H2, H7, H11, H12, E4, S4, S6, CLF1, CLF3, CLF5.

Other Countryside Policies / ***Polisiau Cefn Gwlad Eraill.***
PS2, EC2, EC3, EC4, H3, H5, H6, H8, H10, E5, E8, PS9, S7, MW1, MW2, MW3, MW4, MW5, MW6, MW8, MW9, MW10, CLF7.

Other County Borough-Wide Policies / ***Polisiau Bwrdeistref Sirol Eraill.***
GDP1, GDP2, EC9, EC11, EC13, EC14, EC15, H4, H9, PS10, PS11, PS12, CLF4, CLF6, CLF8, CLF9, CLF10, T1, T6, T8, T9, MW7, MW12, MW13, MW14, S8, S9.

NG
Scale / *Graddfa* 1:10000

UDP Plan showing Rossett totally surrounded by Green Barrier Designation

The next group of slides illustrate a typical example of development on the suggested inclusion site(s).

The LDP proposes to increase the number of units to 137 rather than the 132 illustrated below.

The following data and diagrams have been extracted from the consultants reports that were submitted with the draft scheme. Analysis has shown that there are some serious flaws in the proposals relating to increased flooding to the area but as we have seen this is dismissed in Slide 13 by Wrexham Council in their Local Flood Risk Management Strategy.

Where flaws have been detected in the example housing scheme appropriate commentary is offered.

Plan –Extracted from J10 Planning Statement Feb 2017

ILLUSTRATIVE
MASTERPLAN

A Scheme By
Parkinson Inc
Urban Design &
Master Planning
Jan 2017 showing
132 Units

1st DRAFT ILLUSTRATIVE MASTERPLAN

By Parkinson Inc
Urban Design & Master Planning
From Jan 2017 Design & Access Statement

The accommodation schedule comprises the following:

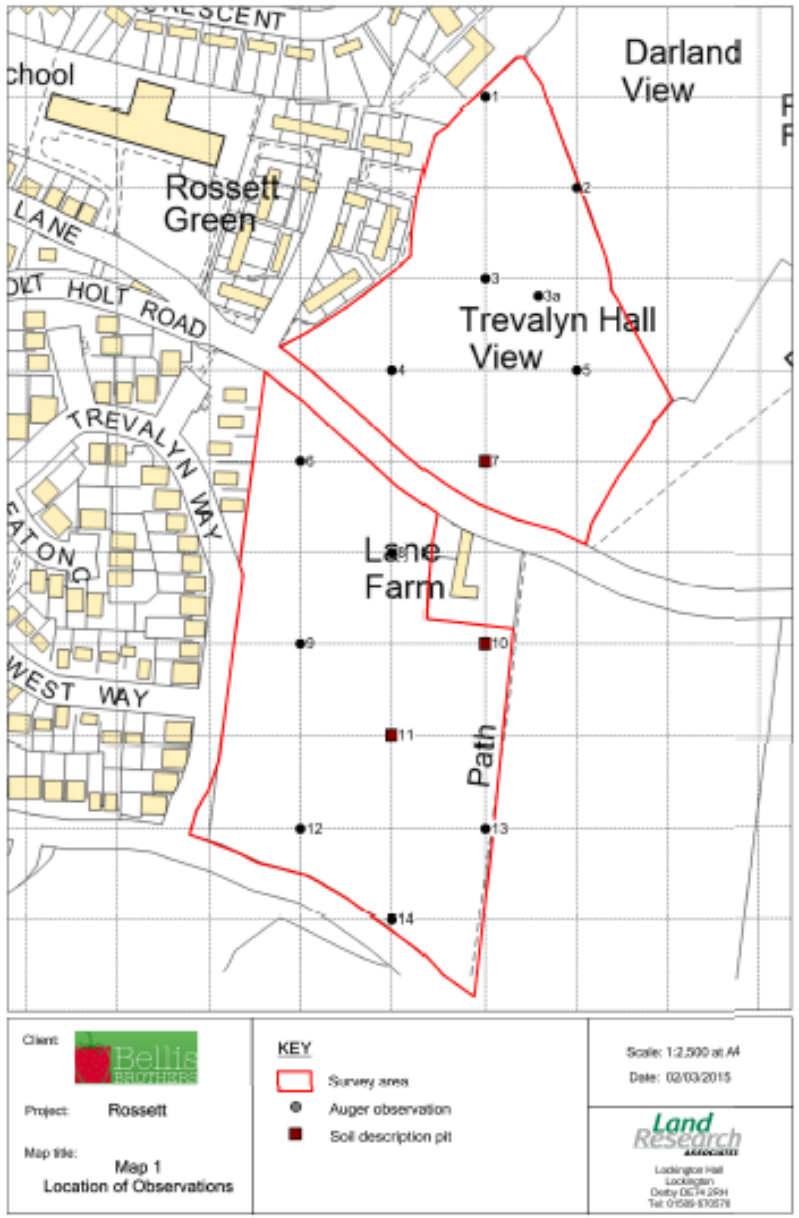
	Parcel (north)	Parcel (south)	TOTAL
Site Area (ha)	2.8	3.4	6.21
Site Area (acres)	6.94	8.41	15.35
2 bed	10	2	12
3 bed	32	41	73
4 bed	19	28	47
Total dwellings	61	71	132
POS	1.17 acres	1.69 acres	2.86 acres
Affordable @ 25%	15	18	33
Density (dph)	21.8 dph	20.9 dph	21.2 dph

Schedule Extracted from J10 Planning Statement Feb 2017

Note Waterlogged area

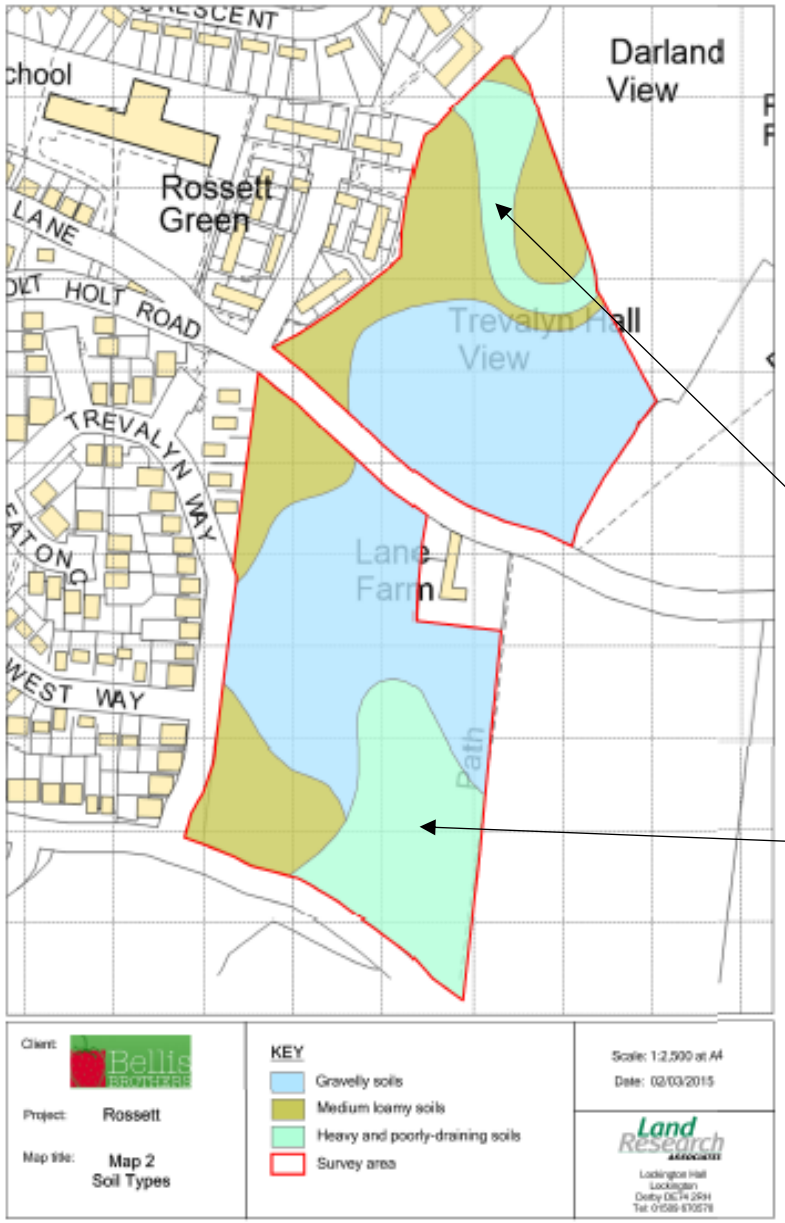
Details from Tigergeo Report
March 2016

Site Location Plan – Extracted from J10 Planning Statement Feb 2017



Test Pits & Auger Holes to assess land quality.

Work by Land Research Associates
March 2015



Land Quality.

Work by Land Research Associates
March 2015

Note Heavy & Poor Draining Soils !
(Green Areas)

Drainage Trial Pit Locations

Aerial Photograph

(Source: Google Maps)

Tests carried out by Waterco September 2015

Drainage Test Pit Results – Extracted from Waterco Report

Location	Test 3 Infiltration Time	Trial hole size LxWxD (Metres)
Trial Pit 1	15 Minutes	2.2 x 0.6x 1.03
Trial Pit 2	26 Minutes	2.2 x 0.7x 1.00
Trial Pit 3	53 Minutes	1.75 x 0.7x 0.93
Trial Pit 4	19 Minutes	1.2 x 0.7x 1.05
Trial Pit 5	Pit did not drain – abandoned trial	1.7 x 0.7x 1.00
Trial Pit 6	Pit did not drain – abandoned trial	1.8 x 0.7x 1.00
Trial Pit 7	13 Minutes	2.0 x 0.7x 1.01
Trial Pit 8	3 Minutes	1.7 x 0.6x 0.91
Trail Pit 9	14 Minutes	1.8 x 0.9x 0.97
Trial Pit 10	123 Minutes	1.8 x 0.9x 0.95
Trial Pit 11	36 Minutes	1.7 x 0.7x 1.04
Trial Pit 12	24 Minutes	1.3 x 0.65x 1.05

Trial Pit	Average Infiltration Rate (m/s)
1	1.28×10^{-4}
2	7.71×10^{-5}
3	4.67×10^{-5}
4	1.26×10^{-4}
5	No rate calculated*
6	No rate calculated*
7	7.83×10^{-5}
8	6.33×10^{-4}
9	1.42×10^{-5}
10	1.69×10^{-5}
11	4.66×10^{-5}
12	8.01×10^{-5}

Table 1 : Summary of Test Infiltration Rates

* No infiltration rate calculated for trial pits 5 and 6. The test was abandoned at trial pits 5 and 6 due to the underlying clay and resulting slow infiltration. Soakaways are not suitable in the location of trial pits 5 and 6.

Tests and calculations carried out by Waterco. Sept 2015

Location	Average Infiltration Rate (m/s)	Efficacy Comparison with Trial Pit 8
Trial Pit 1	1.28×10^{-4}	20.2%
Trial Pit 2	0.771×10^{-4}	12.2%
Trial Pit 3	0.467×10^{-4}	7.3%
Trial Pit 4	1.26×10^{-4}	20.0%
Trial Pit 5	Trial Abandoned	Pit did not drain
Trial Pit 6	Trial Abandoned	Pit did not drain
Trial Pit 7	0.783×10^{-4}	12.4%
Trial Pit 8	6.33×10^{-4}	100%
Trial Pit 9	0.142×10^{-4}	2.3%
Trial Pit 10	0.169×10^{-4}	2.7%
Trial Pit 11	0.466×10^{-4}	7.3%
Trial Pit 12	0.801×10^{-4}	12.7%

Table 1 Recalculated to show variation in infiltration rates when compared with the best - all infiltration rates now expressed to the same base 10^{-4} m/s.

Extract from WaterCo—Land off Holt Road Rossett.

Flood Consequences Assessment and Drainage Strategy

5 Surface Water – No Adverse Impact

5.1 The existing site is 100% permeable, and consists of agricultural land as shown on the aerial image in Appendix A. It is therefore assumed that there is currently no positive drainage and surface water is infiltrating into the ground.

5.2 The proposed development will increase the impermeable area of the site through the introduction of buildings and roads.

5.3 A comparison of the pre and post-development runoff rates and volumes is provided overleaf. The calculations are included in Appendix F. No development plans are currently available therefore an approximate impermeable area of 40% has been used for the post-development calculation. A 30% allowance for climate change has also been included in the post-development calculation.

- Analysis of the WaterCo report shows that the calculations are based on the whole of the site being 100% permeable. This assumption was based on a generalised map of the agricultural land in the area and took the land as category 4. The report goes on to estimate that post development the impermeable area would be 40% and allowed 30% climate change.
- From the work undertaken by Land Research Associates in 2015 (Slide 21) it can be seen that approximately 12% of the field adjacent to Trevalyn Hall View is not permeable and that of the remainder approximately only 50% of the field is satisfactory Gravely soil.
- Similarly the Field adjacent to West Way has approximately 25% soil that is not permeable and that of the remainder approximately only 50% of the field is satisfactory Gravely soil.
- The above therefore casts serious doubts on the assumptions made in Para 5.1 above and as a result the calculations regarding post development runoff appear to be seriously flawed.

- The work carried out by Tigergeo in 2016 also casts major doubts on the permeability of the field adjacent to Trevalyn Hall View.
- Much store is placed on flooding reports in the work by WaterCo in 2015 but the record research is imperfect, similarly the records of Natural Resources Wales. The records do not acknowledge the severe flooding that took place on 25/26 September 1976 when the River Alyn flooding crossed Harwoods Lane and lapped up to the field adjacent to West Way. If proper research had been undertaken it would have been established that the high water levels in 1976 were a combination of intense rainfall and exceptionally high tides on the River Dee. The 2000 floods did not rise to the same level as 1976.
- Similarly the NRA maps delineating the 2000 flood levels conveniently do not show the extent that the flood waters extended into Grosvenor Crescent and Alyn Drive nor does it show the flooding to 37 Alyn Drive.
- With the recent River Alyn flood prevention measures in Station Road it is likely that in the event of high flood water levels even more water will be directed to the designated flood plain adjacent to Alyn Drive increasing the flood risk to adjacent properties.

- Examination of the typical windfall development scheme suggested by Bellis for the site(s) shows that a SUDS scheme for the site will not be altogether effective due to the poor ground conditions. The implications are that there will be increased run off from the site (**Exceedance**), thus increasing the risk of localised flooding either to any new properties or existing properties in the area. In examining the typical outline scheme submitted by Bellis there appears to be no consideration of the earlier recorded flooding on the site(s) and the way this flood risk would be addressed.

- It is therefore essential that Wrexham Council provide full details of their Flood Risk Assessment for the Site(s). The local authority should provide full details of their staff who are actually qualified to carry out or check the Flood Risk Assessments together with all the associated calculations to support the inclusion of this site(s) in the Development Plan. If the Local Authority has relied on the work by Bellis to inform the Development Plan then the wisdom of this must be questioned before finalisation of the Development Plan or it is taken by us to Appeal with the Planning Inspectorate.

Flood risk within the development – SUDS National Standards Require amongst other things:-

- *"The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur on any part of the site for a 3.3% Annual Exceedance Probability rainfall event.*
- *The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur during a 1% Annual Exceedance Probability rainfall event in any part of: a building (including a basement); or in any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.*
- *The design of the site must ensure that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1% Annual Exceedance Probability rainfall event are managed in exceedance routes that minimise the risks to people and property".*

The implications for everyone are that when the SUDS system is overburdened and this is recognised in National Guidance then the system must employ runoff for floodwater from the development:-

Exceedance Guidance Note

"*To satisfy Good Design the LLFA (Wrexham Council) must expect exceedance flows, originating from both within and outside of the development site, must be directed through areas where the risks to both people and property are minimised.*
When considering exceedance routes, particular attention should be paid to:
1. The position of walls, bunds and other obstructions that may direct water but must not cause ponding
2. The location and form of buildings (e.g. terraces and linked detached properties) that must not impede flows or cause ponding
3. The finished floor levels relative to surrounding ground
Submitted drawings and calculations must identify sources of water entering a site pre development, how flows will be routed through a site, where flows leave the site pre development and where they leave the site post development".

The Run off implications for the areas surrounding this site(s) are that there are only 4 places for the Exceedance (over burdening of the SUDS system) to go and they are:-

Trevalyn Hall View, Lane Farm, West Way or Harwoods Lane. This flooding risk conflicts directly Wrexham Council **Key Issues, Vision and Objectives 4** Para 3 (Page 25) and **SO5 :4.9** Para 3 (Page 27)

We will now go on to look at just some access and other issues already affecting the village. Adding another 137 houses in the village will add further to the present problems:-

- The proposed site is located where there is a distinct lack of footpaths from the Village along Rossett Road. – Safe pedestrian access is therefore already compromised so further location of properties in the area will place more pedestrians at risk.
- A regular bus route passing the site has been curtailed with its inherent problems for the less ambulant to travel by public transport to and from the area. With more properties the number of people without a convenient local bus route will increase substantially.
- Traffic congestion/parking in Holt Road/Rossett Road has reached unsatisfactory levels adjacent to the Primary School, The Green, the Park and Chester Road.

- Hitherto the doctor's practice in the village has been under pressure with the surgery only open restricted hours and days of the week. With the planned closure of Gresford Medical Centre the intention is to transfer many of Gresford and Marford's 5000 Residents to Rossett Surgery. Opening the Rossett Surgery for 5 days a week will most likely be inadequate for this total increase in prospective patients up to 8200.
- The primary school is already well subscribed and an additional 137 properties will inevitably require at least 1 or 2 form entry increase in the school capacity.
- The traffic hazard situation has worsened substantially since the opening of the Co-op in Holt Road and it is only a matter of time until a serious accident occurs in this location. More estate traffic will increase the risk.

- The secondary school already has an influx of pupils from Wrexham itself and again will inevitably require at least 1 or 2 form entry increase in the school capacity to accommodate local children.
- The road condition is very poor throughout the village and the possible addition of an estate adding approximately between 130 and 250 more cars to the area will increase congestion substantially and markedly increase road wear to already pot holed roads.
- The village does not possess a permanent Bank or Post Office thus villagers have to travel out of the village for these facilities. Increasing the population will further focus on the lack of facilities in the village.

- All of the items create additional pressures on the existing infrastructure and community facilities in direct conflict with Wrexham Council Strategic Policy 5.20 (Page 38) not so to do.
- The typical scheme shown attached if forced through does not meet the requirements of SP1: Housing Provision (Page 36) in terms of the first 5 essential criteria for Housing Development.
- **Policy DM1: Development Management Considerations** (Page 94)The inclusion of this site(s) fails to satisfy:

e. *Be safely and conveniently accessible for all potential users/occupiers of the development on foot, bicycle, by public transport and by car;*

f. Not give rise to parking or highway safety problems on site or in the locality;

g. Maximise sustainable travel choices first and then provides for car related needs.

i. *Not increase the risk of flooding but makes adequate provision for sustainably dealing with foul and surface water drainage and not result in an unacceptable impact upon the water environment;*
j. *Consider the needs of a diverse population including those with protected characteristics such as age or disability.*

Policy SP19: Climate Change (Page 87) Section 5.120 Regarding Design Access Statements for Development - Bullet Point 4 asks *"How flood risk within areas susceptible to fluvial and surface water flooding has been considered in accordance with TAN15: Development and Flood Risk".*
This key policy point appears to have been conveniently overlooked by the LPA (Wrexham Council) with the inclusion of the site(s) in its LDP.

Conclusions

As a result of all these concerns the site(s) inclusion in the development plan should be opposed on the grounds that:-

a. it is an unwelcome intrusion into The Green Barrier (Policy EC1) and the Special Landscape Area Policy (EC5).
b. is too large in scale representing approximately 11% increase in the village size,
c. it will overburden the present village amenities and infrastructure
d. it will place further strain on the local road network
e. it will not provide the required degree of affordability but will result in an exclusive enclosed development,

Conclusions Continued

f. it does not enhance the landscape when viewed from the existing village
g. the initial economic benefits of the development do not exceed the longer term financial implications and investment required by the local authority and NHS etc. to support this major population influx
h. it poses flood risks to the new properties by the suggested drainage methods in varying ground conditions and
i. it is likely to add further to the water entering the flood plain bearing in mind the history of earlier flood waters breaching Harwoods Lane and lapping up to the area suggested for the SUDS pond.

Conclusions Continued

j. Existing properties in the immediate surrounding areas have been refused insurance cover due to the flood risk potential and flooding history in the area, so the Local Authority being aware of the problems associated with the suitability or otherwise of this site(s) must be prepared to indemnify all the surrounding properties against flood risks increased by the flawed inclusion of the site(s) in the LDP or face the prospect of a class action against them for their decisions that make matters worse.

k. The simplest solution for the dilemma being created for and by the LPA is to <u>completely remove</u> the suggested site(s) from the Development Plan!

Date : April 2018

Summary

It is clear that inclusion of this site(s) in the Development Plan should be opposed in its present form and the way forward should be to send this proposal back to the planners to present a revised development plan that does not contradict the Local Authority Commitment & their definition of Sustainable Development. The inclusion of this site(s) in the Plan will damage the village and its infrastructure and potentially increase the risk of flooding in the area contrary to the Local Authority stated policy.

At present the example application we have seen does not demonstrate this care and concern not withstanding all the nice sketches, plans and technical reports plus the enthusiastic words in the Design and Access Statement and the nice wording of the LDP.

END

WREXHAM DEVELOPMENT PLAN 2013 to 2028

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