

Land North of Bronwylfa Road, Wrexham - Flood Risk Statement

Version 3

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Prepared for:

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This report describes work commissioned by Innova Renewables Developments by an instruction dated 28th March 2023. The Client's representative for the contract was William Griffiths of Innova Renewables Developments. Erica Skinner of JBA Consulting carried out this work.

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Abbreviations

AEP Annual Exceedance Probability

BGS British Geological Survey

FCA Flood Consequence Assessment

FMfP Flood Map For Planning

FRS Flood Risk Statement

LiDAR Light Detection And Ranging

NGR National Grid Reference

NRW Natural Resources for Wales

OS Ordnance Survey

OS NGR Ordnance Survey National Grid Reference

PFRA Preliminary Flood Risk Assessment



1 Introduction

1.1 Terms of Reference

JBA Consulting (JBA) were commissioned by Innova Renewables Developments in March 2023 to undertake a Flood Risk Statement (FRS) to support a planning application for the development for a proposed energy storage location at land north of Bronwylfa Road, Rhostyllen, Wrexham.

2 Site Description

2.1 Site Summary

The main development site is broadly triangular in shape, comprising a single agricultural field parcel and extends to approximately 5.5 ha in area. The site's boundaries feature a broad tree belt to the north and east, with hedgerows to the south and west. A former railway line runs along the northern boundary (set at a higher level and bounded by the mature vegetation) whilst the A483 lies to the east which is also elevated and bounded by mature established vegetation. The B5097 / Bronwylfa Road forms the southern boundary and Cadwgan Lane, a single-track road, forms the western boundary.

An existing vehicular access is located at the main development site's southern boundary from the B5097.

The land to the west of Cadwgan Lane comprises an L-shaped agricultural field and extends to approximately 3.4ha. It is bounded a tree belt to the north, Bersham Cricket Club to the southwest, and the B5097 / Bronwylfa Road to the south. An access track for abnormal loads extending to approximately 0.2ha is proposed on the southern part of this field.

Agricultural land and uses form the site's predominant surroundings to the north, south and west with pockets of residential properties dispersed throughout. To the east of the site (approx. 500m), on the opposite side of the A483, is the village of Rhostyllen. The Legacy National Grid Substation, which the proposals will connect to, is located approximately 750m west of the site.

Wrexham City Centre is located approximately 3km north-east.

Site details are summarised in Table 2-1, and a site location plan is shown in Figure 2-1.



Table 2-1 Site Summary

Site name	Legacy Substation
Main Site area	5.5 ha
Existing land use	Greenfield
Proposal	Energy storage and substation
OS NGR	SJ 30707 48525
Local Planning Authorities	Wrexham County Borough Council
Lead Local Flood Authority	Wrexham County Borough Council

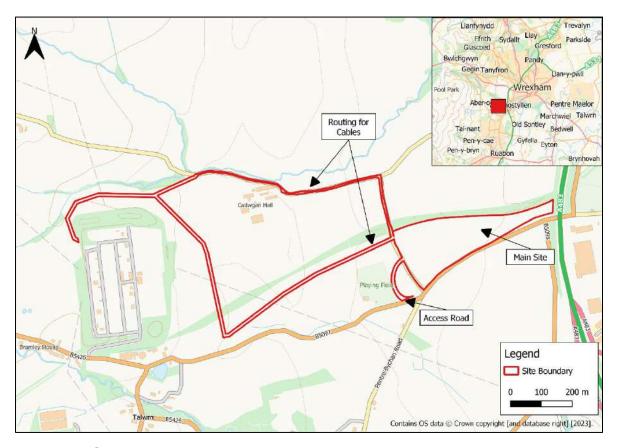


Figure 2-1 Site Location

2.2 Site Topography

A topographic survey undertaken by RPS Group in March 2023 has been conducted across the Main Site only and is shown in Appendix A. The topographic survey indicates that ground levels on the Main Site are highest in the west along the northern boundary at approximately 116.36mAOD. A raised area of ground in the south-west of the site is shown to be at approximately 116.22mAOD. From these highest points, ground levels fall in a general easterly direction to approximately 105.61mAOD in the eastern boundary of the site.

Levels across the cable routing areas reach approximately 151mAOD near the power station.



Figure 2-2 shows Natural Resources Wales (NRW) Open Source 1m Light Detection and Ranging (LiDAR) data, which provides an alternative illustration of the site's topography.

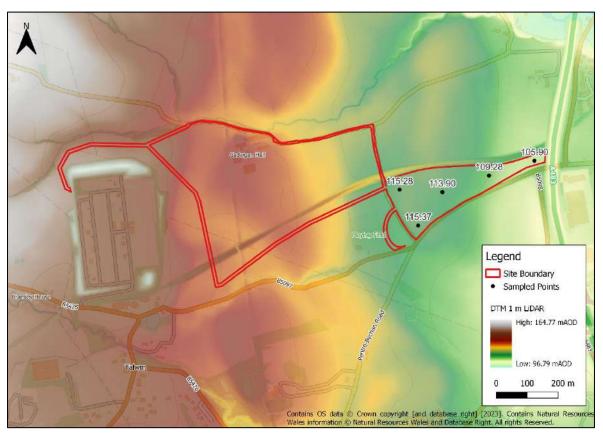


Figure 2-2 LiDAR Topographic data from NRW (1m resolution) with sample points

2.3 Soils and Geology

The geology of the site has been assessed using the British Geological Survey (BGS) Geolndex¹. The bedrock is shown to be Etruria Formation in the east comprised of mudstone, and Pennine Lower Coal Measures Formation and Pennine Middle Coal Measures Formation in the west, comprised of mudstone, siltstone and sandstone. The superficial geology is formed of Devensian Till, comprised of Diamicton in the east, and far west for the cable routing, and Devensian Glaciofluvial Deposits, comprised of sand and gravel in the west.

The soils on the site have been assessed on the Cranfield University Soilscape viewer² and are shown to be freely draining slightly acid loamy soils.

¹ https://mapapps2.bgs.ac.uk/geoindex/home.html

² https://www.landis.org.uk/soilscapes/index.cfm



2.4 Watercourses

No watercourses cross the proposed development site. The River Clywedog, an NRW Main River, flows in a general easterly direction approximately 500m to the north of the site, as shown in Figure 2-3. An unnamed ordinary watercourse (a tributary to the River Clywedog) flows adjacent to the northern cable routing spur and approximately 250m to the north-west of the Main Site. Approximately 550m to the south of the site is the Pentrebychan Brook, which flows into the Glanyrafon Brook to the eastern side of the A483. The Glanyrafon Brook then flows in a general easterly direction before converging with the River Clywedog around 2km to the east of the site.

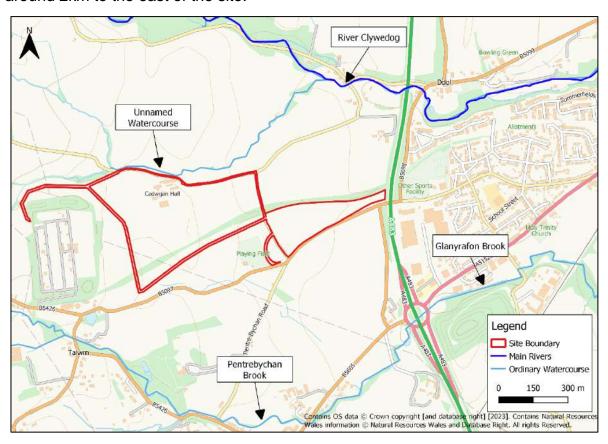


Figure 2-3 Nearby Watercourses

2.5 Development Proposal

The proposal comprises installation and operation of an Energy Storage System (ESS) including energy storage units, substation, site access, cable connection, landscaping and ancillary infrastructure. It should be noted that the two cable routes shown are options, where only one will be delivered. A masterplan for the proposed development site is contained in Appendix B.

Access for construction and operation will be from the existing B5097 access and the new access established from the unnamed lane on the site's western boundary.

As part of the development proposals, a desk-based cut and fill exercise has been undertaken to alter ground levels across the site. A plan of the proposed ground levels across the site is included within Appendix A.



The proposed ESS development comprises:

- 400kV Substation with Gas Insulated Switchgear (GIS) building & Transformers;
- Energy storage containers;
- 33kV transformer bays;
- Medium Voltage (MV) Skid Inverters & Transformers;
- Control buildings;
- Access from the adopted highway;
- Internal access road and crushed stone tracks;
- Drainage infrastructure, landscape, and ecological planting; and
- Security fencing and CCTV.

A masterplan for the proposed development site is shown in Appendix B.



3 Planning Policy and Flood Risk

3.1 Planning Context

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. These policies have the aim that all development in Wales is sustainable and improve the social, economic, environmental, and cultural wellbeing of Wales as set out in the Wellbeing of Future Generations Act 2015.

Technical Advice Note 15 (TAN-15), introduced by the Welsh Government in 2004, provides technical guidance relating to development planning and flood risk in Wales. The initial requirements of TAN-15 are to identify the vulnerability classification(s) and flood zones relevant to the proposed development, and to apply this information to the application of the justification tests.

Update drafts for TAN-15 were released in October 2021 and January 2023 and the final update was due to be implemented in June 2023. However, Welsh Government subsequently suspended the implementation of the new TAN-15 and it is uncertain as to when this shall now come into force, although the best estimate at this time is 2024.

Although the new TAN-15 is not a material consideration, Welsh Government and NRW advise that some consideration is given to the draft Flood Map for Planning (FMfP) as best available information.

3.2 Vulnerability Classification

TAN-15 assigns one of three flood risk vulnerability classifications to a development, as shown in Table 3-1. The proposed development is for an energy storage location and is consequently classified as 'Less Vulnerable' Development.

Table 3-1 Development Categories Defined by TAN-15

Development category	Types	
Emergency services	Hospitals, ambulance stations, fire stations, police stations, coastguard stations, command centres, emergency depots and buildings used to provide emergency shelter in time of flood.	
Highly vulnerable development	All residential premises (including hotels and caravan parks), public buildings, (e.g., schools, libraries, leisure centres), especially vulnerable industrial development and waste disposal sites.	
Less vulnerable development	General industrial, employment, commercial and retail development, transport and utilities infrastructure , car parks, mineral extraction sites and associated processing facilities, excluding waste disposal sites.	



3.3 Development Advice Map Classification

The Development Advice Map (DAM) is used to trigger different planning actions based on a precautionary assessment of fluvial and tidal flood risk.

Figure 3-1 shows that the main site is located within DAM Zone A, which are areas considered to be at little or no risk of fluvial or tidal/coastal flooding.

A small section of the cable routing area to both the northern and southern spur is located within DAM Zone C2. Zone C2 is defined as areas of the floodplain without significant flood defence infrastructure.

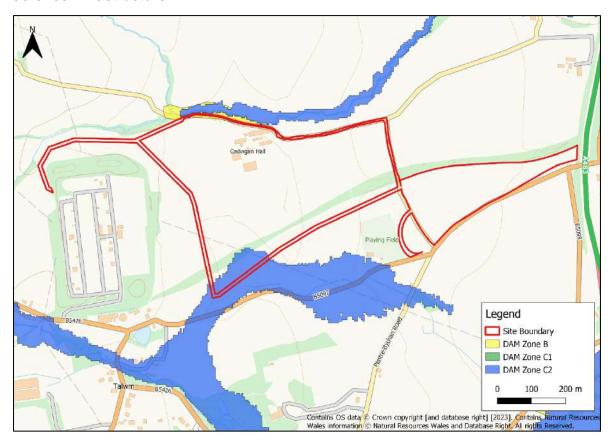


Figure 3-1 Development Advice Map

3.4 Flood Map for Planning Classifications

3.4.1 Flood Map for Planning - Rivers

As shown in Figure 3-2, the entirety of the proposed development site is located within Flood Zone 1 for the Flood Map for Planning for Rivers, representing areas which have less than 1 in 1000 (0.1%) chance of flooding in a given year, including climate change.





Figure 3-2 Flood Map for Planning - Rivers

3.5 Summary of Planning Policy Position

Under the extant TAN-15 the DAM is used to trigger different planning actions. Any site located within Zone C2 triggers the requirement for an FCA. The zone is used to indicate that only less vulnerable development should be considered subject to application of the justification test, including acceptability of the consequences.

However, in response to the release of the Flood Map for Planning in September 2021, NRW issued a letter to Local Planning Authorities in January 2022 outlining their approach to development management consultations where flood risk is a material consideration. Key to their consideration is that the DAM map is out of date, having not been updated for over 2 years, with no future updates expected. The Flood Map for Planning therefore constitutes the best available spatial information on flood risk, and is updated every 6 months. Consequently, NRW consider both the DAM and Flood Map for Planning as part of the consultation process.

If a site is shown to be at risk of flooding on the DAM but not at risk on the Flood Map for Planning, NRW will raise 'no objection' to a planning consultation. For these sites, it is likely to be unnecessary to prepare an FCA.

As the proposed development site is located fully in Flood Zone 1 of the Flood Map for Planning for rivers and seas, a full FCA is therefore not required. However, a Flood Risk Statement has been prepared to comprehensively assess flood risk associated with the







4 Flood Risk Assessment

This section assesses the risk to the proposed development site from all sources of flooding, based solely on a desk-based analysis of existing flood risk data.

4.1 Review of Existing Flood Risk Data

The latest available information on flood risk at the site, published by Natural Resources Wales (NRW) is summarised in Table 4-1 below.

Table 4-1 Summary of Flood Risk

Source of Flooding	Onsite Presence	Description
Flood Risk from Rivers	×	The site is at very low risk of river flooding.
Flood Risk from the Sea	×	The site is at very low risk of tidal flooding.
Flood Risk from Surface Water and Small Watercourses	✓	The site is at low risk of surface water flooding.
Flood Risk from Groundwater	*	The site is at very low risk of flooding from groundwater.
Flood Risk from Reservoirs	✓	The site is at low risk of flooding from reservoirs.
Flood Risk from Sewers	×	There are no sewerage infrastructures crossing or in the vicinity of the site at the site, therefore the risk of sewer flooding at the site is very low.

4.2 Historical Flooding

NRW's map of recorded flood extents does not show any evidence of historic flooding on the site. Wrexham's Local Flood Risk Management Plan³ states that 'Historically, flooding incidents have resulted as a result of intense rainfall events overloading the existing drainage infrastructure, the vast majority of which is below ground via highway or sewer drainage system or culverted watercourses.' There is however no specific mention of historic flooding to the proposed development site itself.

4.3 Flood Risk from Rivers

NRW's Flood Risk Assessment Wales (FRAW) flood mapping indicates that the site is located outside of the Flood Risk from Rivers mapping, as shown in Figure 4-1. The site is therefore at **very low** risk of fluvial flooding (<0.1% AEP).

³ https://wrexham-consult.objective.co.uk/portal/ldp/dldp/ldp_deposit?pointld=4207408#document-4207408



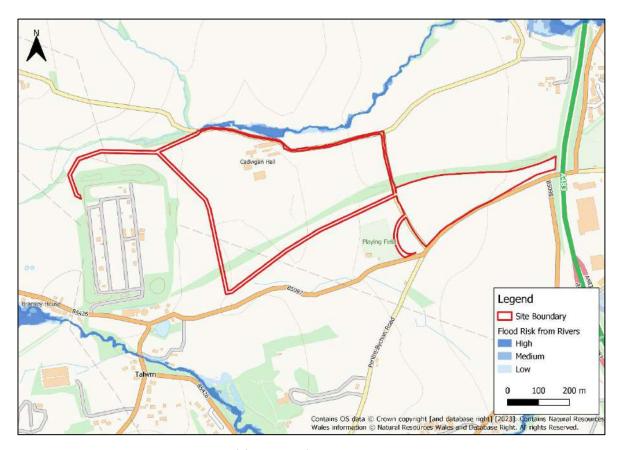


Figure 4-1 FRAW map – Risk of flooding from rivers

4.4 Flood Risk from the Sea

Due to the site's location inland, the site is at **very low risk** of tidal flooding. This is shown by a transparent layer on NRW mapping, and therefore no figure has been provided.

4.5 Flood Risk from Surface Water and Small Watercourses

Surface water flooding occurs when rain falling on saturated ground flows overland, following the local topography. Surface water flooding and subsequent overland flow can therefore pose a risk to both the development site and the surrounding land. The overland flow may originate from the site itself or adjoining land at a higher elevation from which flow migrates onto the development.

The Natural Resources Wales (NRW) flood map for surface water and small watercourses, as shown in Figure 4-2, identifies the site as being predominantly at very low risk of surface water flooding (i.e. less than 1 in 1000 (<0.1% AEP) chance of flooding from rainfall in any given year).

A small area in the east of the site is shown to be at high risk of surface water flooding. (i.e. greater than 1 in 30 (>3.3% AEP) chance of flooding in any given year). This surface water flood risk is likely a result of a localised depression in the site topography. Development proposals do not result in a change in ground levels in this area of the site, and no built



development is proposed for this area. Consequently, there shall be no change in risk as a result of the proposals.

Surface water and small watercourse mapping also indicates the presence of surface water flow paths and ponding along the north-western boundary of the main development site. Ground levels at this location fall away from the proposed development site, and it is therefore considered that there is very low risk of these flows entering the development.

An area outside of the red line boundary, located between the proposed access road and main development site, is at high risk of surface water flooding, meaning there is a greater than 1 in 10 (>3.3% AEP) chance of flooding in any given year. This surface water risk is a result of a localised depression, retaining surface water at this location. Bronwylfa Road, the development site, and the access road are raised above this area of high surface water flood risk.

Along the proposed access road, a small area of the road at its' southernmost extent is shown to be at high risk of surface water flooding, as shown in Figure 4-3. NRW's Flood Hazard Mapping indicates that flood depths of up to 90mm are predicted during High Risk events. Minor alterations in ground levels are proposed across the access road, however it is not anticipated that the surface water flow path shall be interrupted as a result of the proposed access road, with flows retained across the road towards the localised depression to the east. Site constraints, primarily the requirement for abnormal load vehicle tracking along the access road, require the road to be positioned at this location, at the proposed width as shown. However, the width of the road (approximately 17m) is solely as a requirement for abnormal load routing. Consequently, during everyday use of the access road, vehicles (including emergency services) shall be able to utilise the remainer of the road located outside of the area of flood risk for access and egress to the development site. It is recommended, that abnormal load deliveries are scheduled around local weather warnings to avoid surface water flood risk constraints or impacts to the development.

Once operational, the new access road will be used, at most, once per month as maintenance vehicles will access the site either from the B5097 access or the new access on the western boundary directly from Cadwgan lane.

There is a very low risk of surface water and small watercourse flooding across the cable routing areas of the development site.

Consequently, the risk of surface water flooding across the development site is low.

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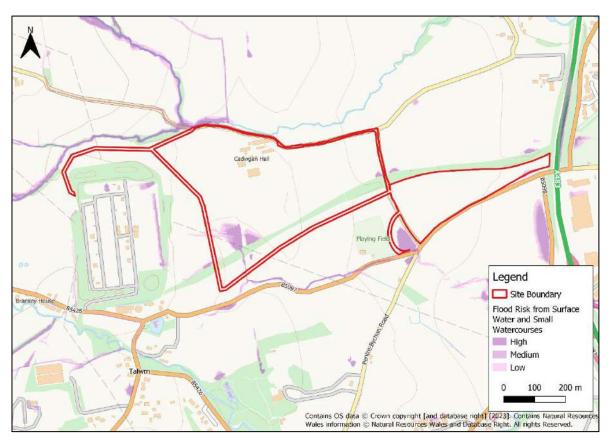


Figure 4-2 FRAW map - Risk of flooding from surface water and small watercourses



Figure 4-3 FRAW - Risk of flooding from surface water to the access road



4.6 Flood Risk from Groundwater

Groundwater flooding is caused by unusually high groundwater levels. It occurs as excess water emerges at the ground surface or within manmade structures such as basements. Groundwater flooding tends to be more persistent than surface water flooding, in some cases lasting for weeks or months, and can result in damage to property. This risk of groundwater flooding depends on the nature of the geological strata underlying the site and the local topography.

Wrexham's Local Flood Risk Management Plan⁴ states that 'The PFRA identified no records of past groundwater flooding within the County Borough'. It can therefore be concluded that the risk of groundwater flooding at the site is **very low**.

4.7 Flood Risk from Reservoirs

NRW flood maps indicate that the proposed development site is partially located within an area at risk of reservoir flooding, as shown in Figure 4-4. The site is at risk of flooding from two reservoirs: the Ty-Mawr and Cae-Llwyd; located approximately 1.7 km and 2.3 km to the west of the site. As a result of regular inspections covered by the 1975 Reservoir Act, it is extremely unlikely that a reservoir would fail, and therefore the risk of reservoir flooding is considered to be **low**.

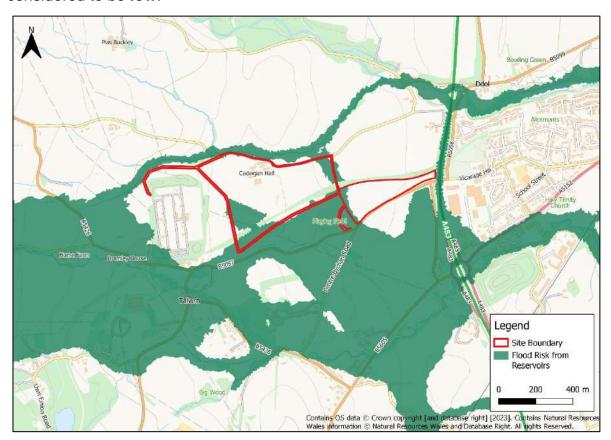


Figure 4-4 Risk of reservoir flooding

⁴ https://wrexham-consult.objective.co.uk/portal/ldp/dldp/ldp_deposit?pointld=4207408#document-4207408



4.8 Flood Risk from Sewers

A Utilities Search Report provided by Cronerstone Projects Ltd dated 25th August 2022 is shown in Appendix C. This highlights that there are no sewerage infrastructures crossing or in the vicinity of the site. It can therefore be concluded that the risk of sewer flooding at the site is **very low**.



5 Assessment of Acceptability Criteria

To adopt a precautionary approach, this FRS will still demonstrate how all aspects of the Acceptability Criteria will be satisfied in full. This has been detailed in Table 5-1 below.

Table 5-1 Assessment of accessibility criteria

TAN 15 Justification Criteria	Comments	Achieved
Developer is required to demonstrate that the site is designed to be flood free for the lifetime [Ref: TAN-15 A1.5] of development for a 1 in 100 (1%) chance (fluvial) and 1 in 200 (0.5%) chance (tidal) flood event including an allowance for climate change in accordance with TAN-15 table A1.14.	The proposed development site is located outside of both the fluvial and tidal flooding extents and is therefore flood free in all design events.	Yes
The development should be designed so that in an extreme (1 in 1000 chance) event there would be less than 600mm of water on access roads and within the property.	The proposed development site is located outside of both the fluvial and tidal flooding extents and is therefore flood free in all design events.	Yes
No flooding elsewhere.	The proposed development is located outside of both the fluvial and tidal flooding extents and development will therefore not result in an increase in flood risk to third parties.	Yes
Flood defences must be shown by the developer to be structurally adequate particularly under extreme overtopping conditions (i.e. that flood with a 1 in 1000 chance of occurring in any given year).	N/A. The site is not served by any formal flood defences.	N/A
The developer must ensure that future occupiers of development are aware of the flooding risks and consequences.	N/A - the site is not predicted to flood in all design events.	N/A
Effective flood warnings are provided at the site.	N/A - the site is not predicted to flood in all design events.	N/A
Escape/evacuation routes are shown by the developer to be operational under all conditions.	N/A - the site is not predicted to flood in all design events.	N/A



TAN 15 Justification Criteria	Comments	Achieved
The development is designed by the developer to allow the occupier of the facility for rapid movement of goods/possessions to areas away from flood waters.	N/A - the site is not predicted to flood in all design events.	N/A
Development is designed to minimise structural damage during a flooding event and is flood proofed to enable it to be returned to its prime use quickly in the aftermath of the flood.	N/A - the site is not predicted to flood in all design events.	N/A



6 Conclusions and Recommendations

JBA Consulting (JBA) were commissioned by Innova Renewables Developments to undertake a Flood Risk Statement (FRS) to support a planning application for the development for a proposed energy storage location at land north of Bronwylfa Road, Rhostyllen, Wrexham.

The proposed development site is located to the west of Rhostyllen, Wrexham. The main site area (excluding the route for cables) is approximately 5.5 ha in size and is greenfield in nature, previously used for pastural farming purposes. The site is bound to the east by the A483 and to the south by B5097, which provides existing access. An unnamed minor road bounds the western boundary of the main site, and adjacent to the northern boundary is a disused railway line. The area allocated within the boundary for cable routing is located to the west across the adjacent field.

Development proposals for the site are for the installation and operation of an Energy Storage System (ESS) including energy storage units, substation, site access, cable connection, landscaping and ancillary infrastructure. It should be noted that the two cable routes shown are options, where only one will be delivered.

The main development site is located within DAM Zone A, which are areas considered to be at little or no risk of fluvial or tidal/coastal flooding. Zone A is used to indicate that the Justification Test is not applicable and there is no need to consider flood risk further.

A small section of the cable routing area is located within DAM Zone C2, but as stated in a letter by NRW in January 2022 'If a site is shown to be at risk of flooding on the DAM (i.e. within Zone C, but not at risk on the new FMfP, we would raise 'no objection'.' The site is located with Flood Zone 1 of the FMfP. Consequently, a full FCA is not required and the site has not been assessed against the Justification Test. An assessment against the acceptability criteria has been undertaken for completeness.

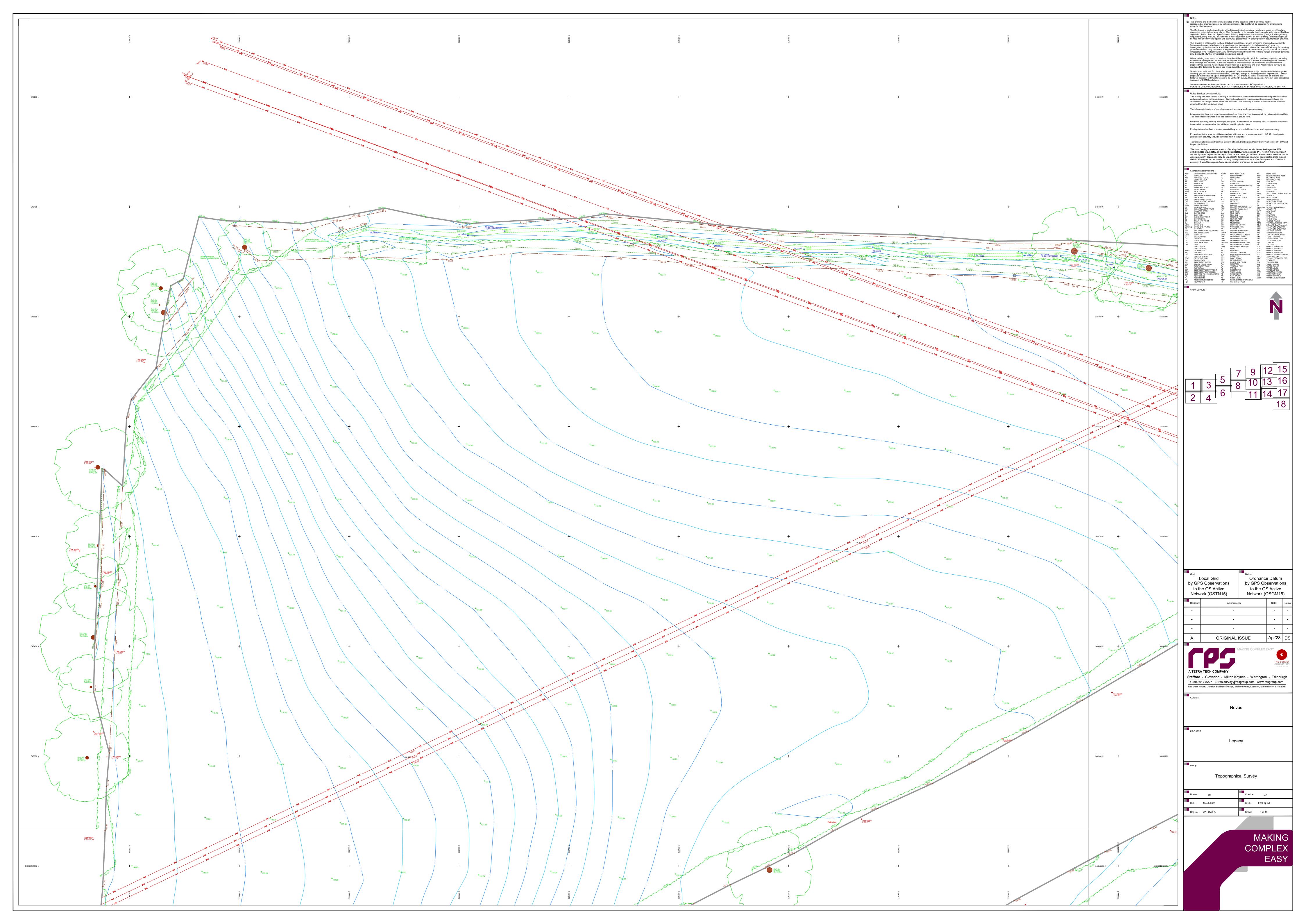
The main development site is at low risk of reservoir flooding and is at very low risk of fluvial, tidal, groundwater and sewer flooding.

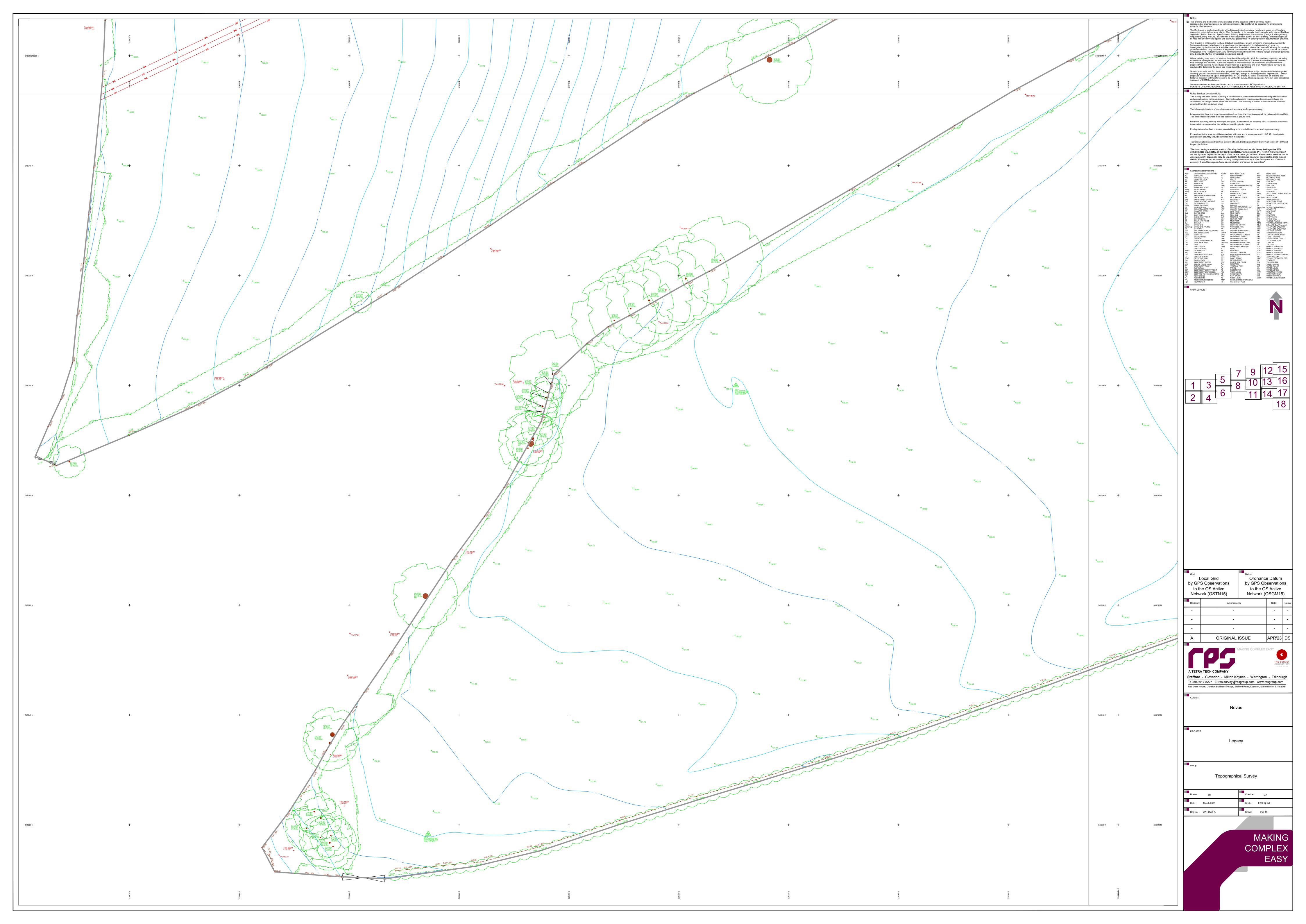
The site is shown to be at risk of surface water flooding however this risk will be mitigated through the application of SuDS, in accordance with the statutory standards for SuDS in Wales. Consequently, the residual risk of surface water flooding will be low.

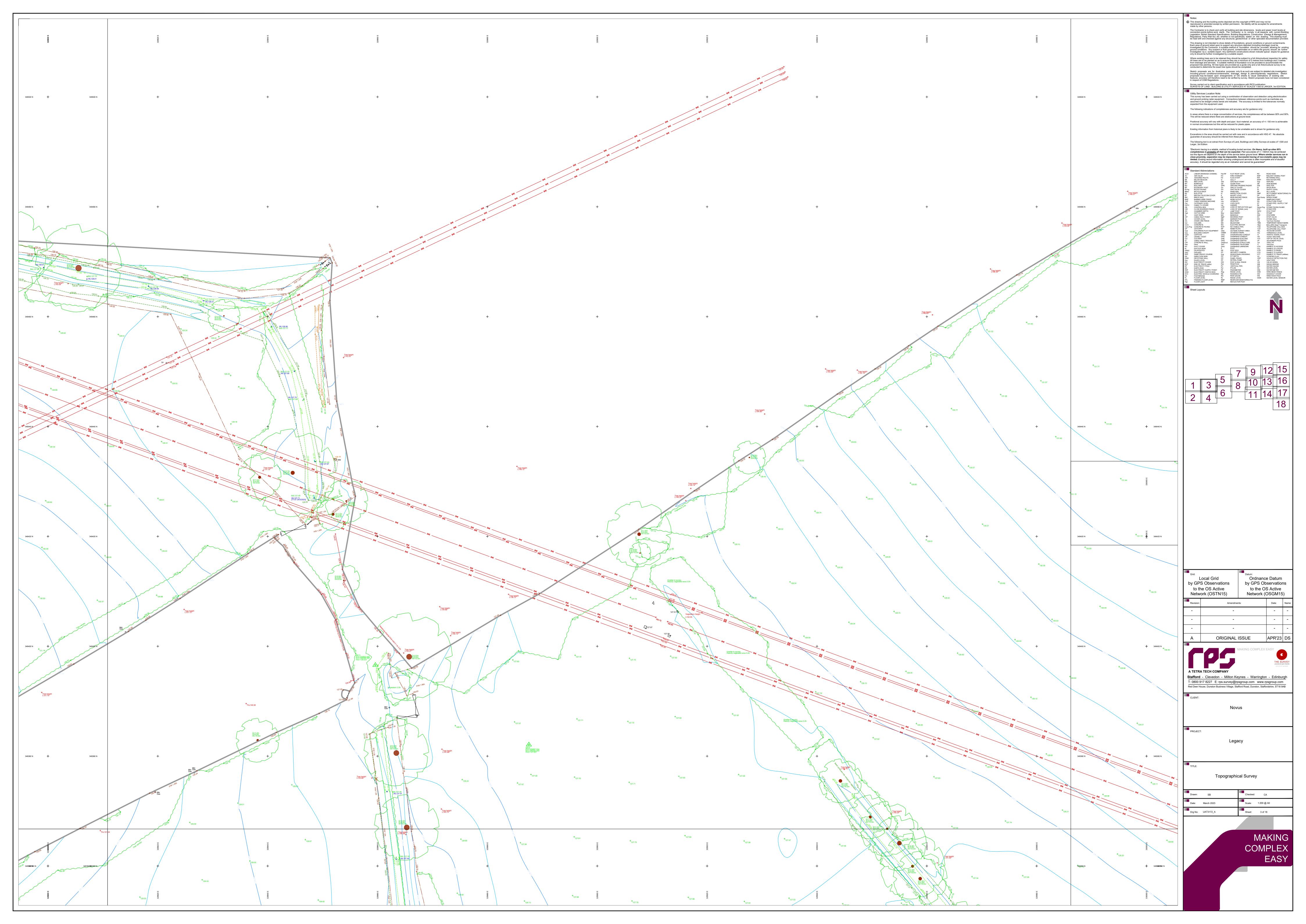
All aspects of the Acceptability Criteria set out in TAN-15 have been assessed and shown to be satisfied. Consequently, we conclude that on the grounds of flood risk, the proposed development meets the requirements set out in TAN-15 and the aims of Planning Policy Wales.

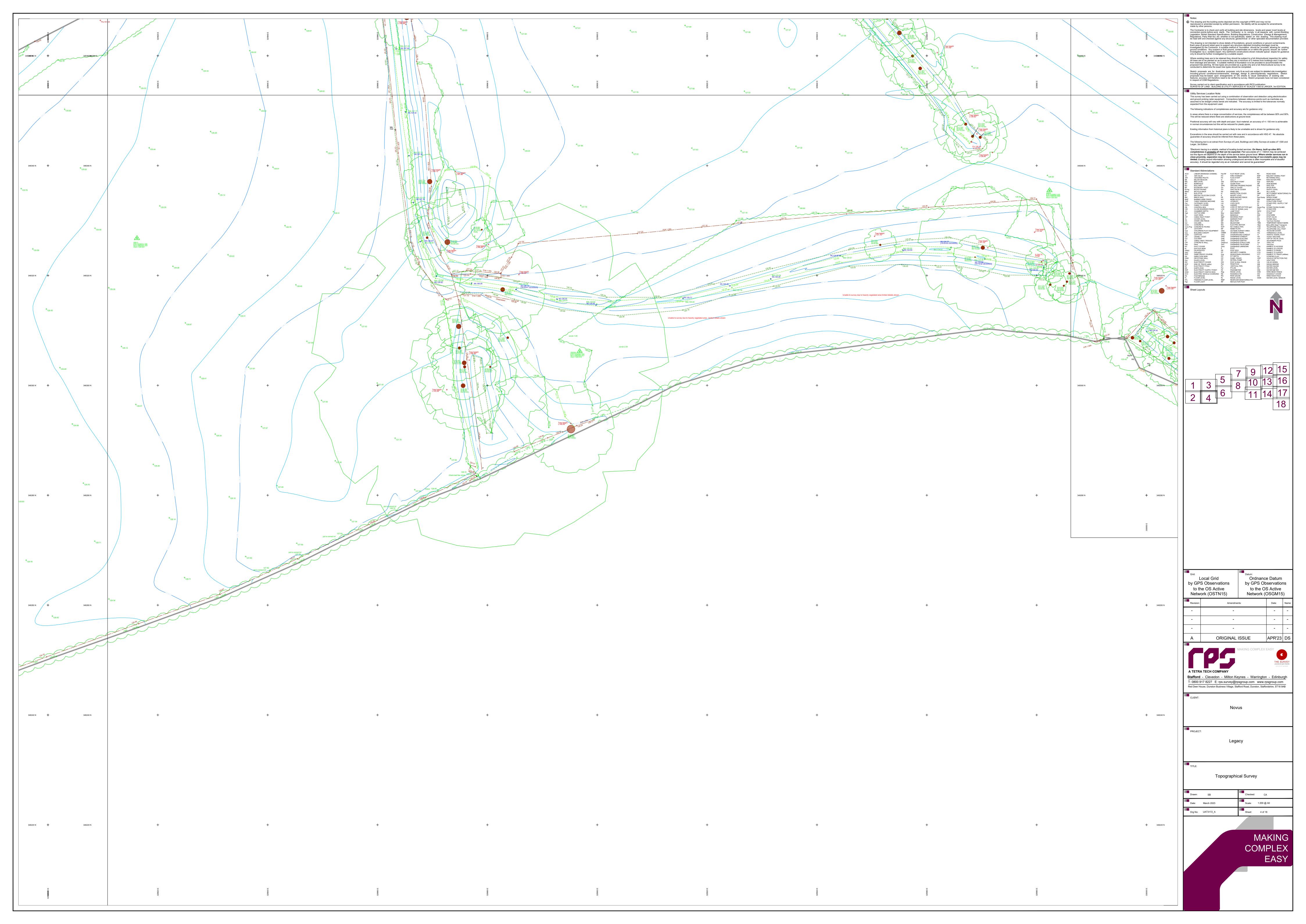


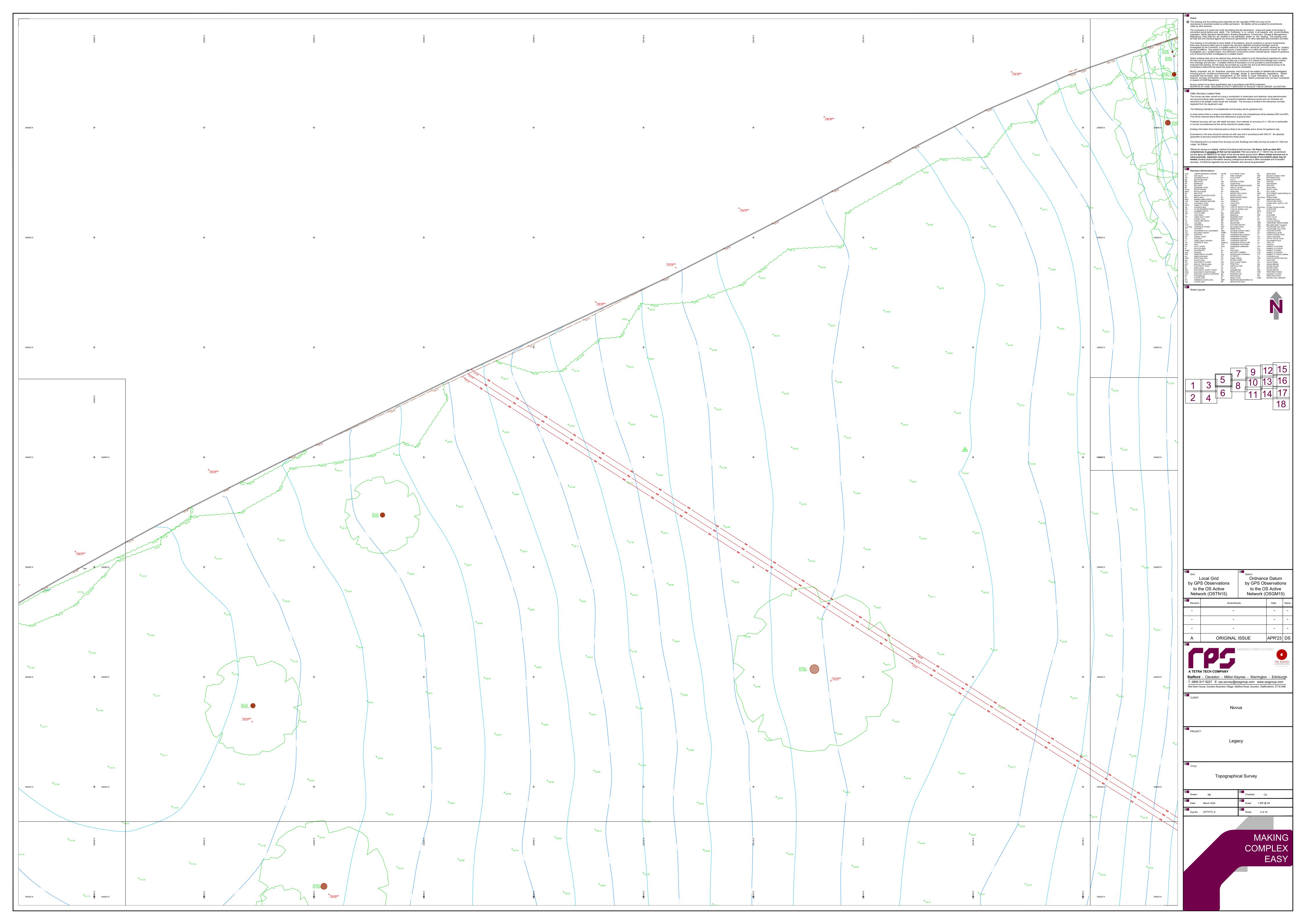
A Topographic Survey

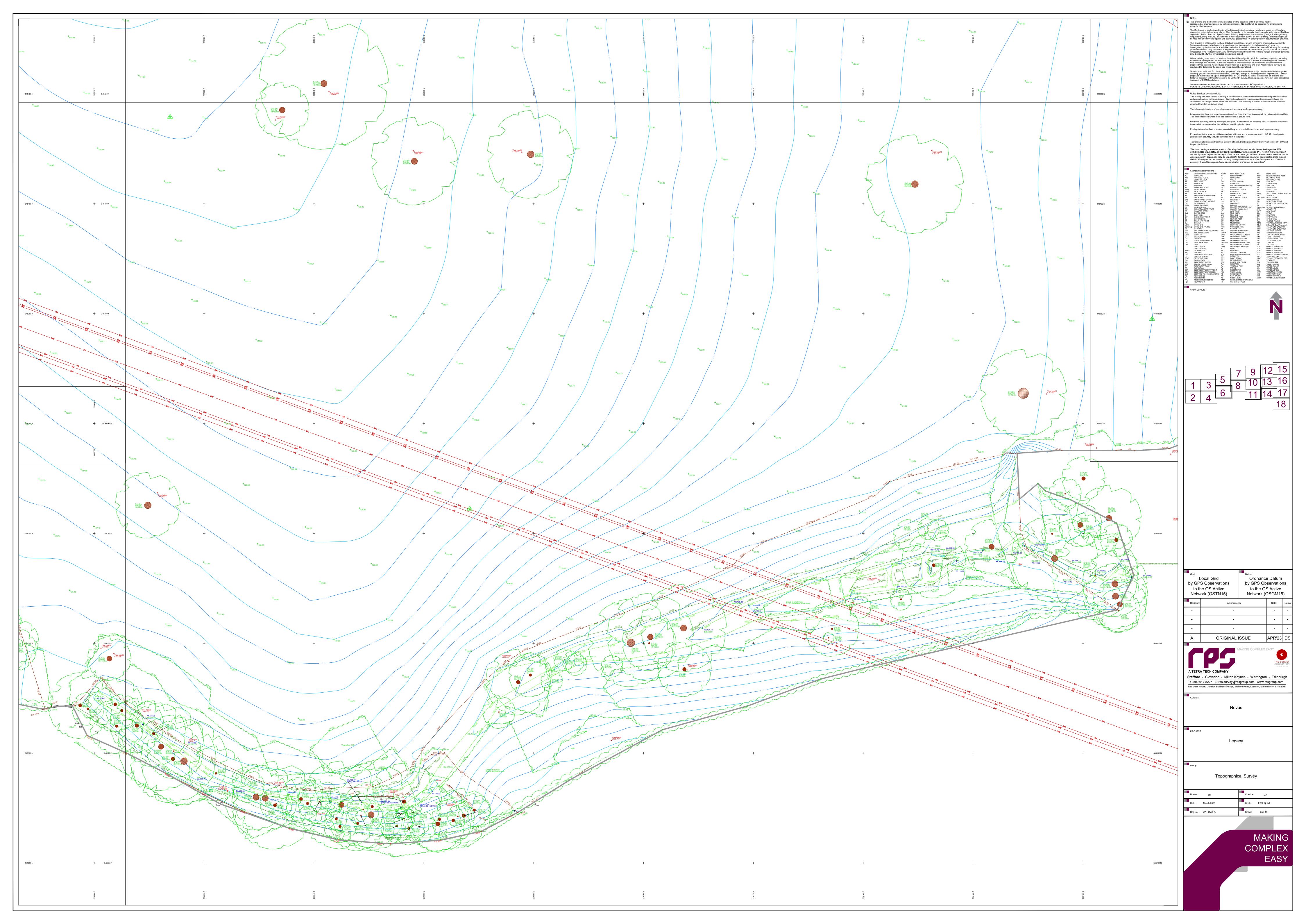


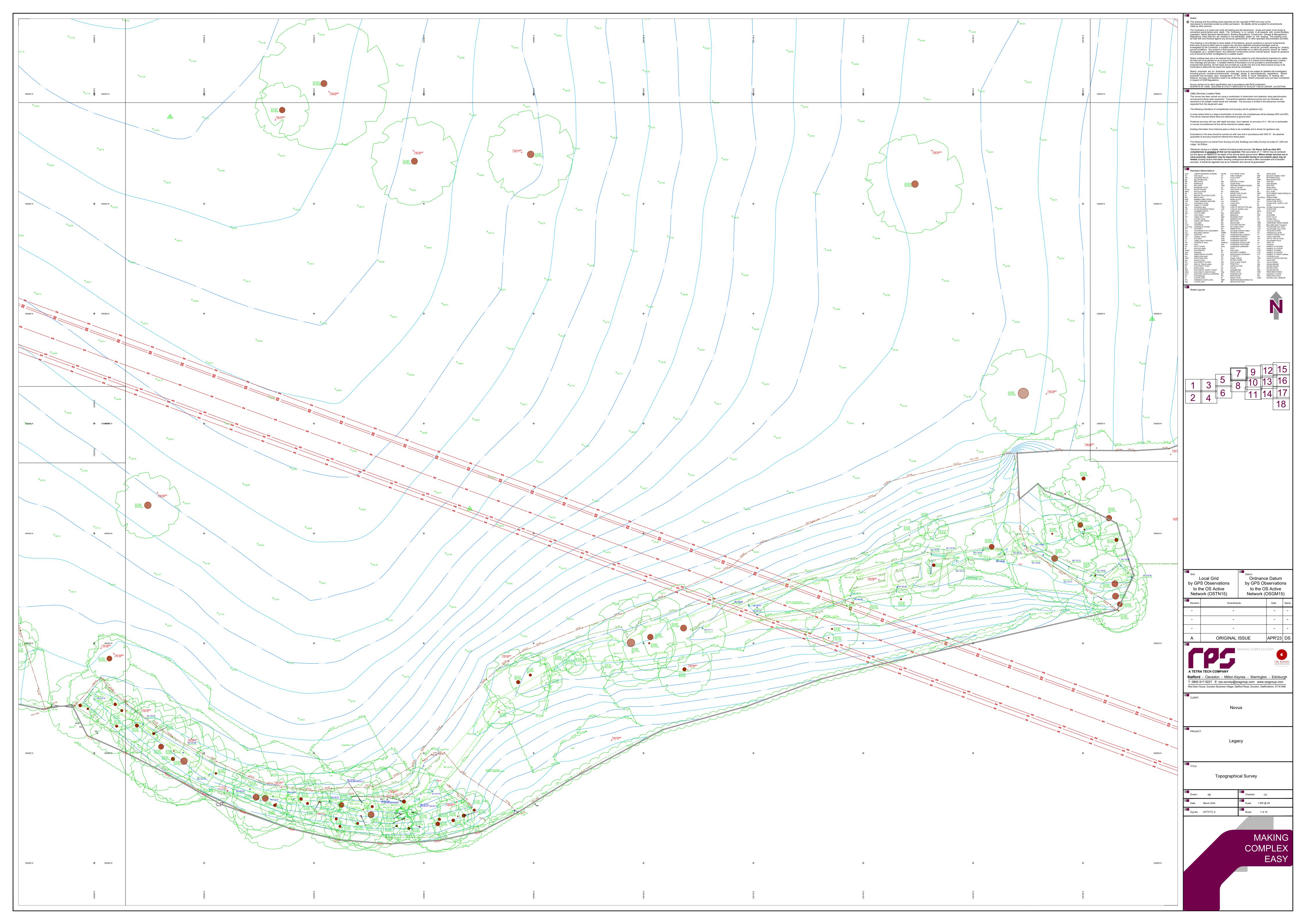


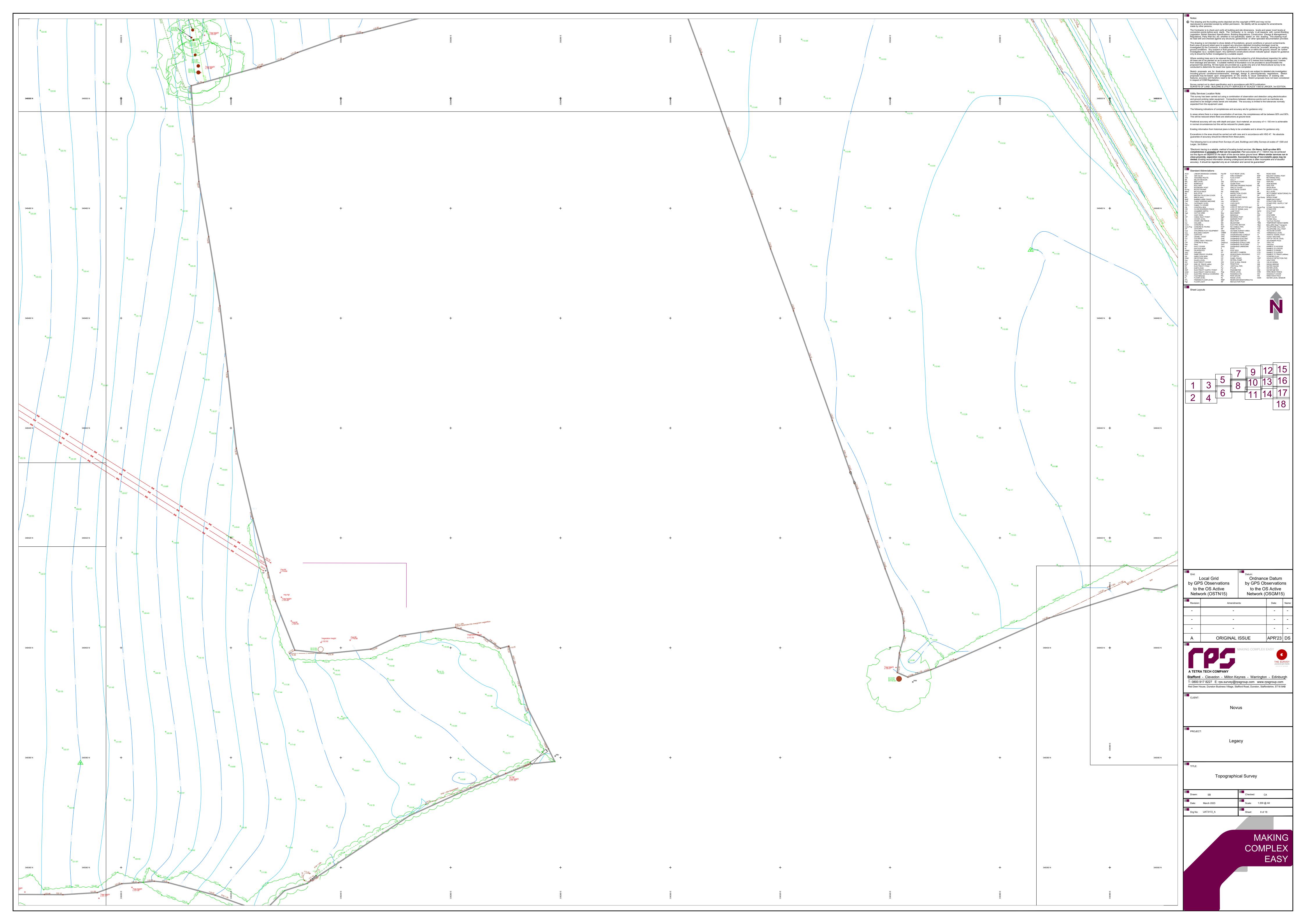


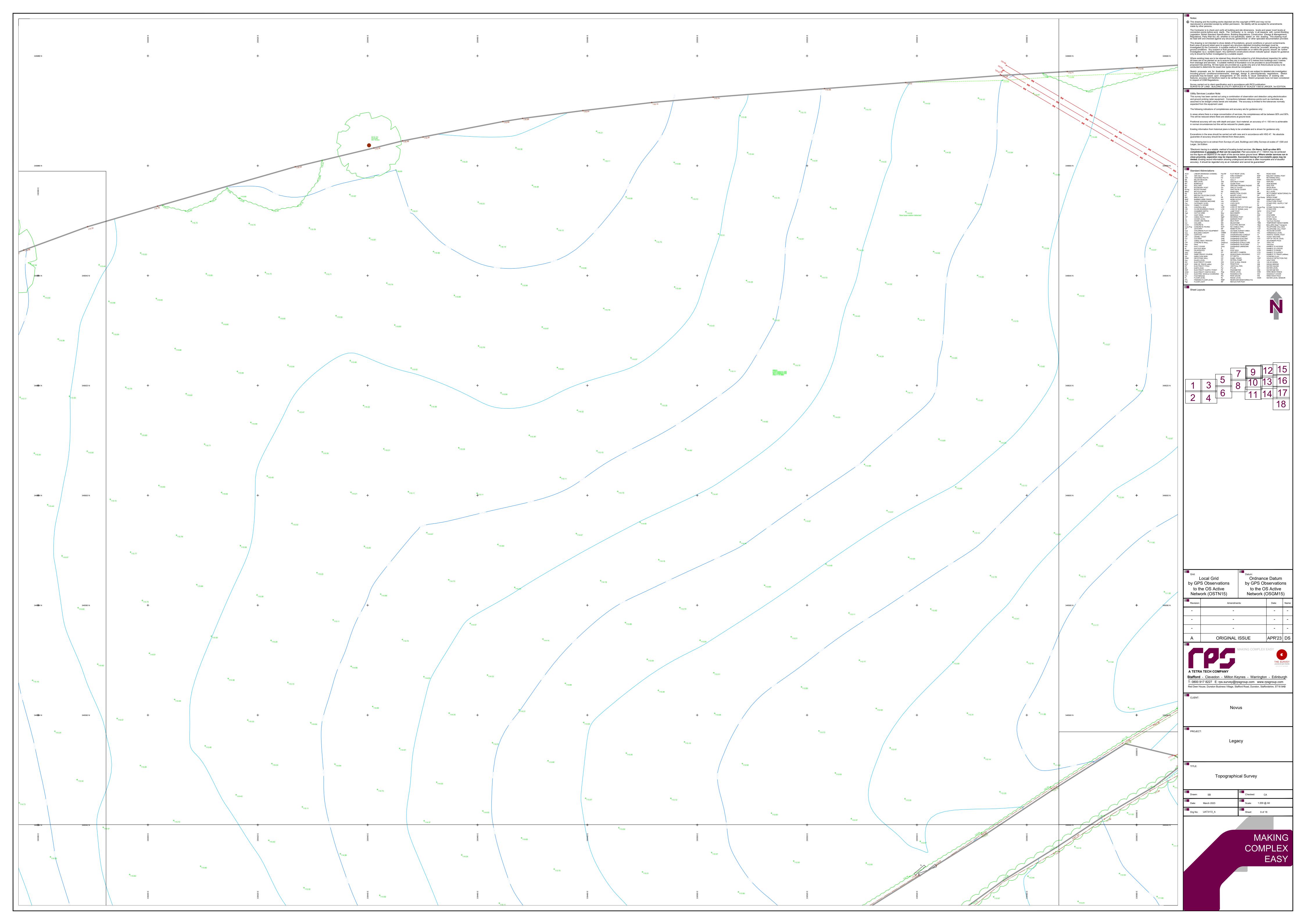


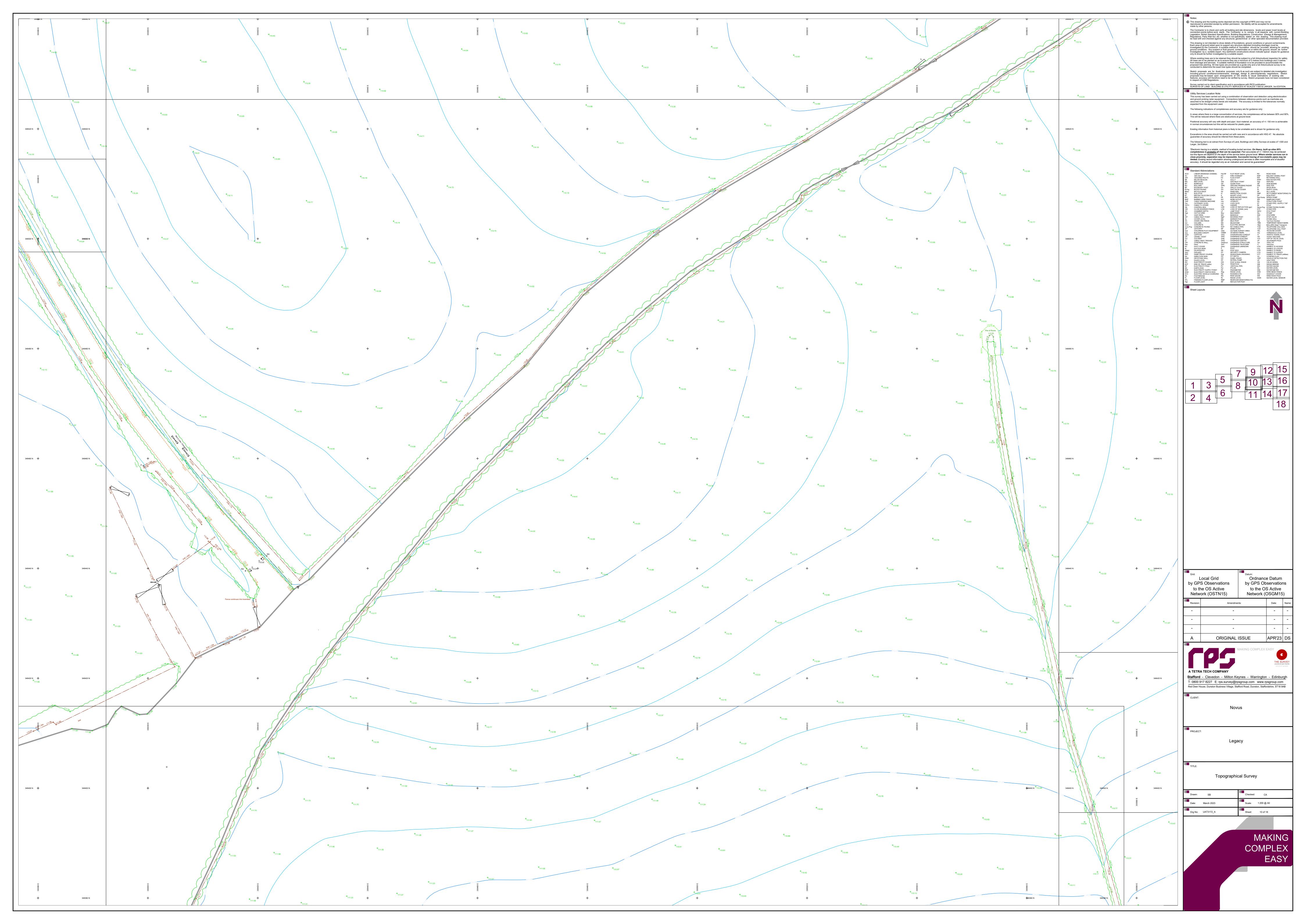


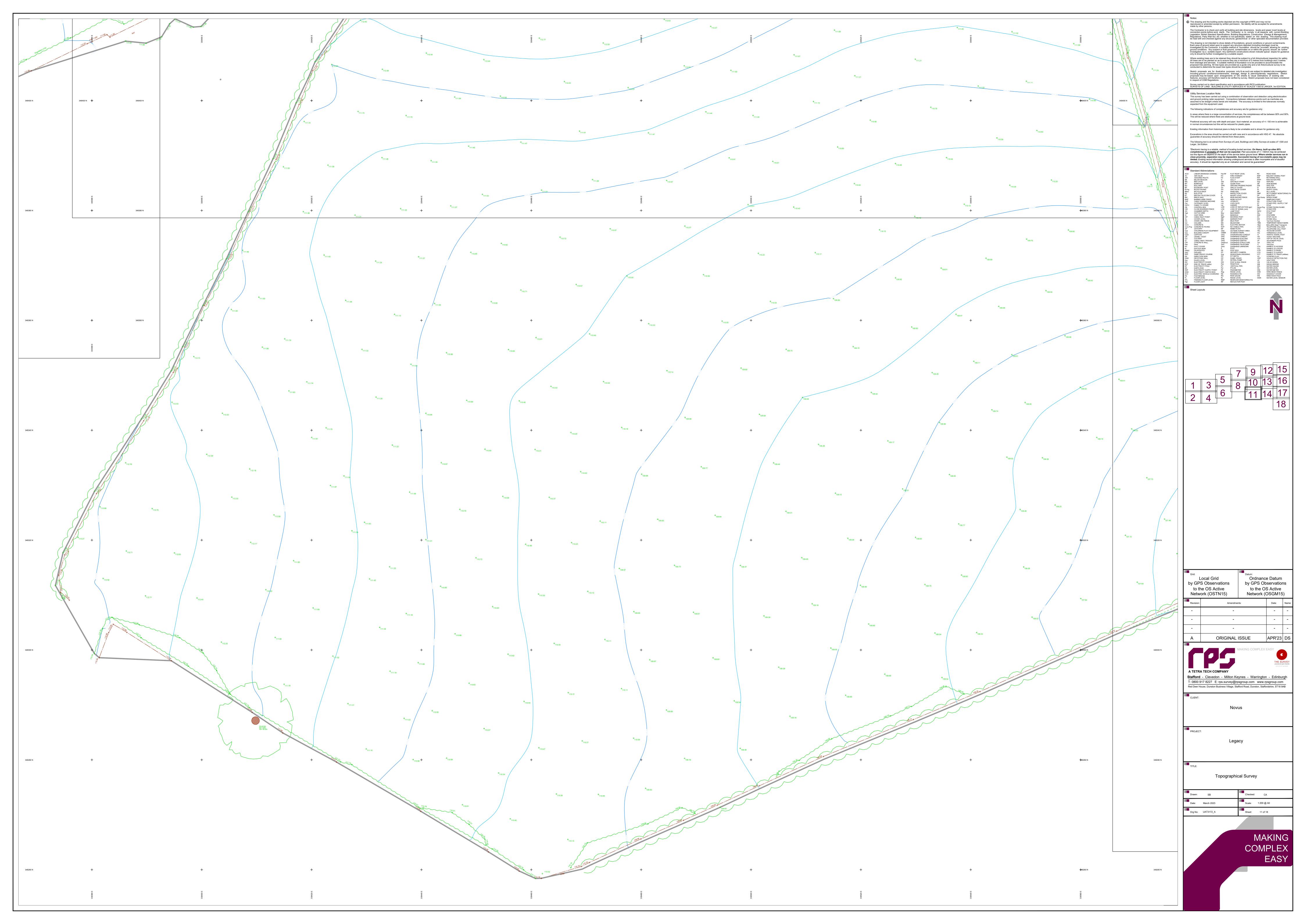


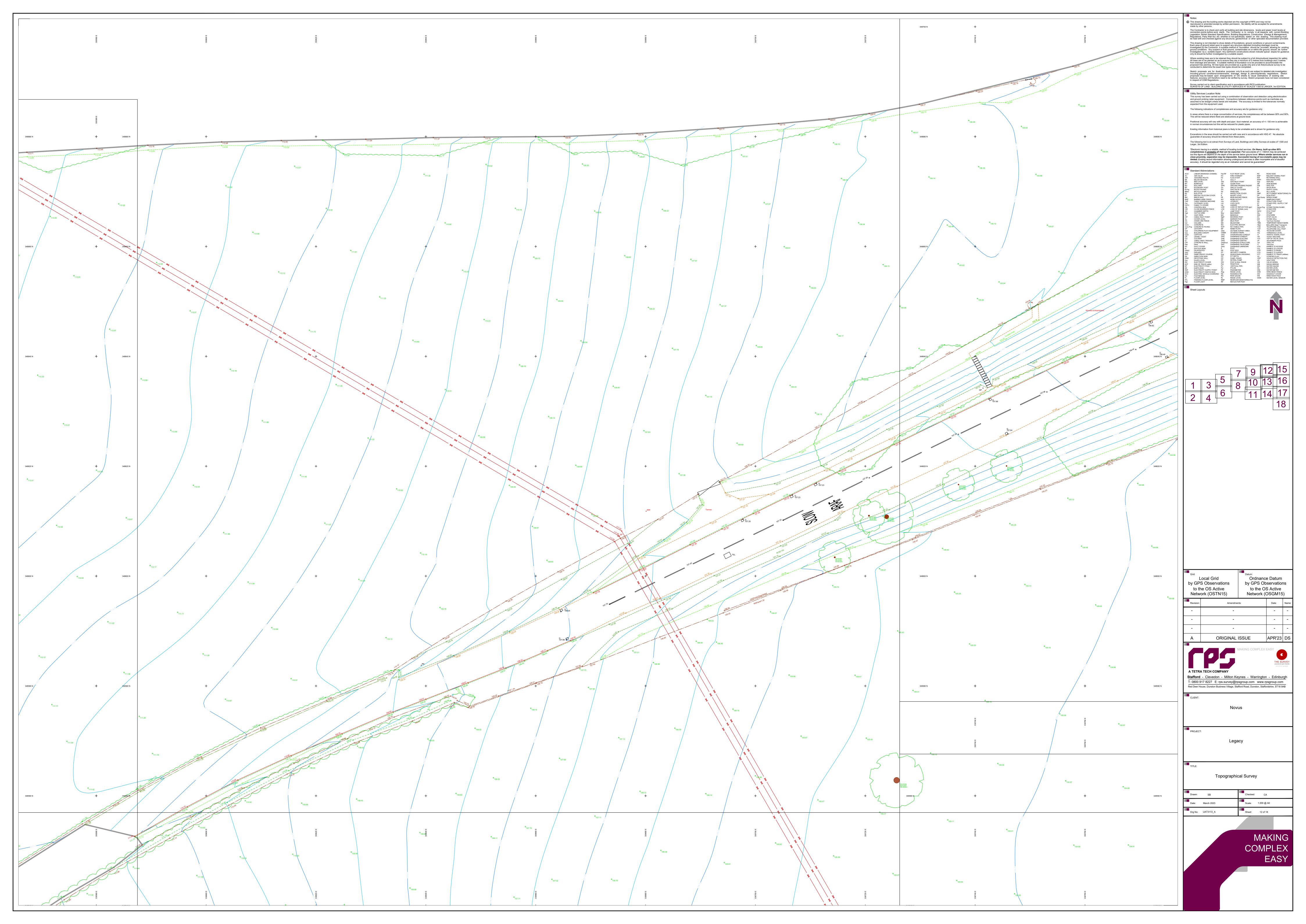


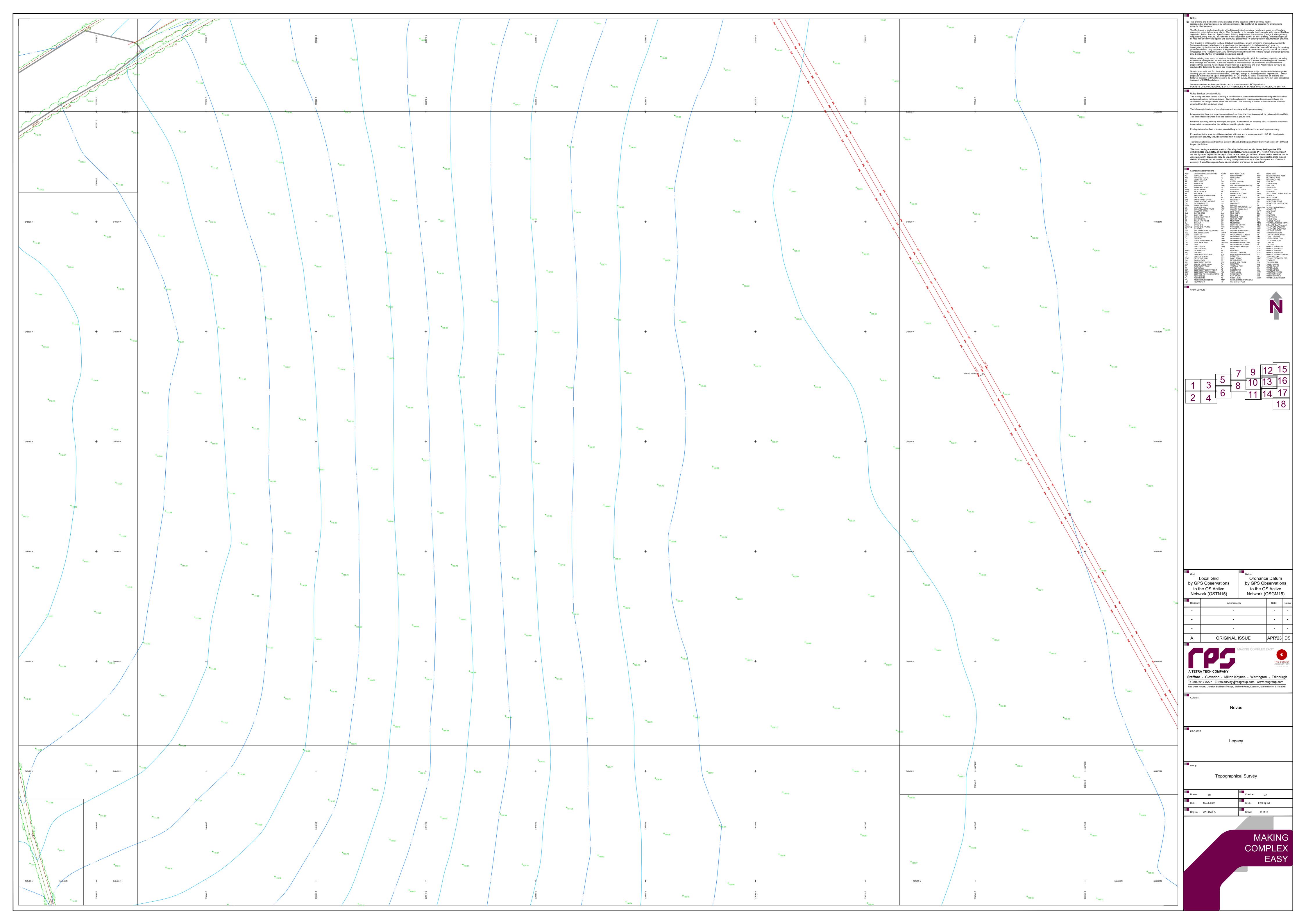


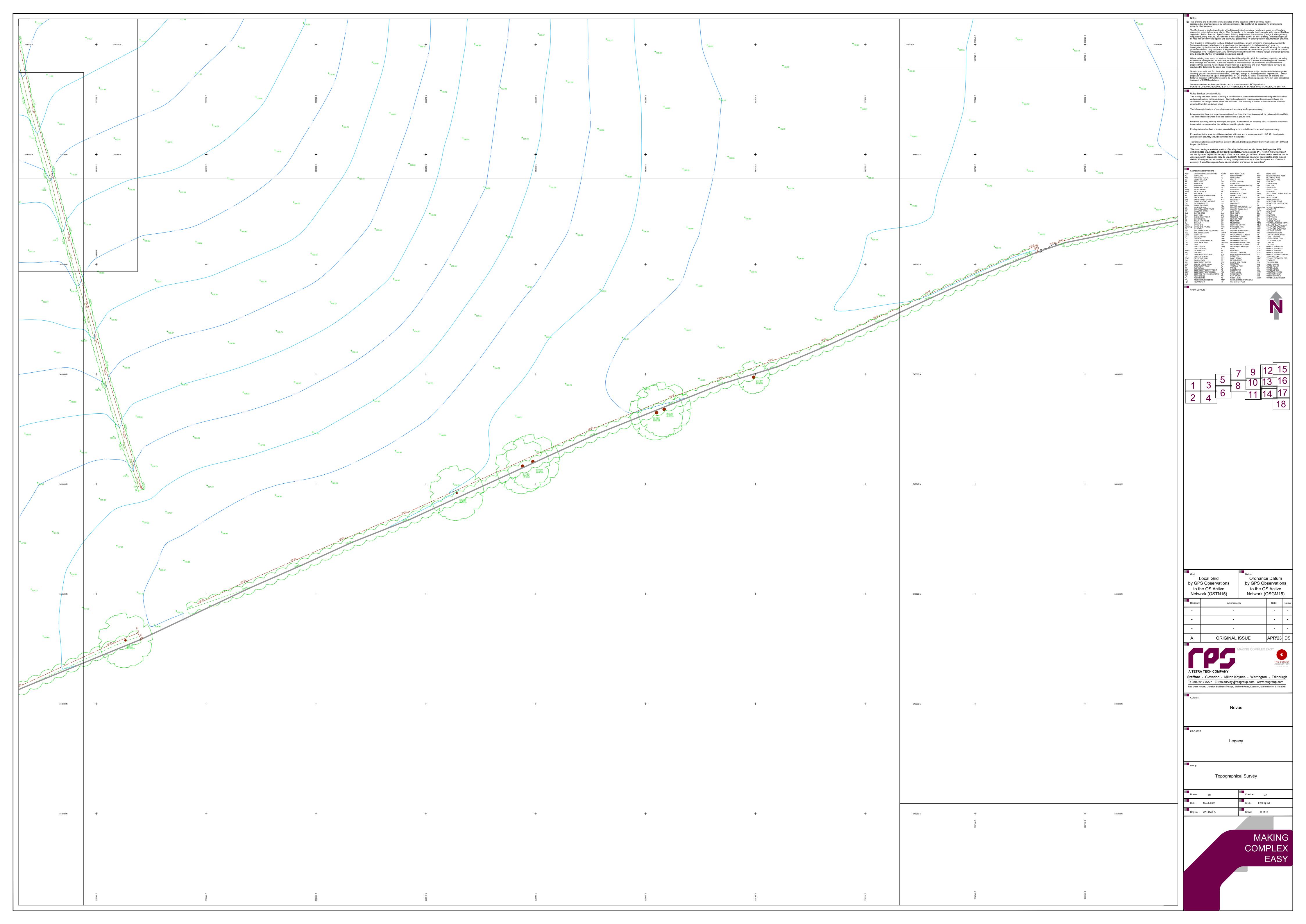




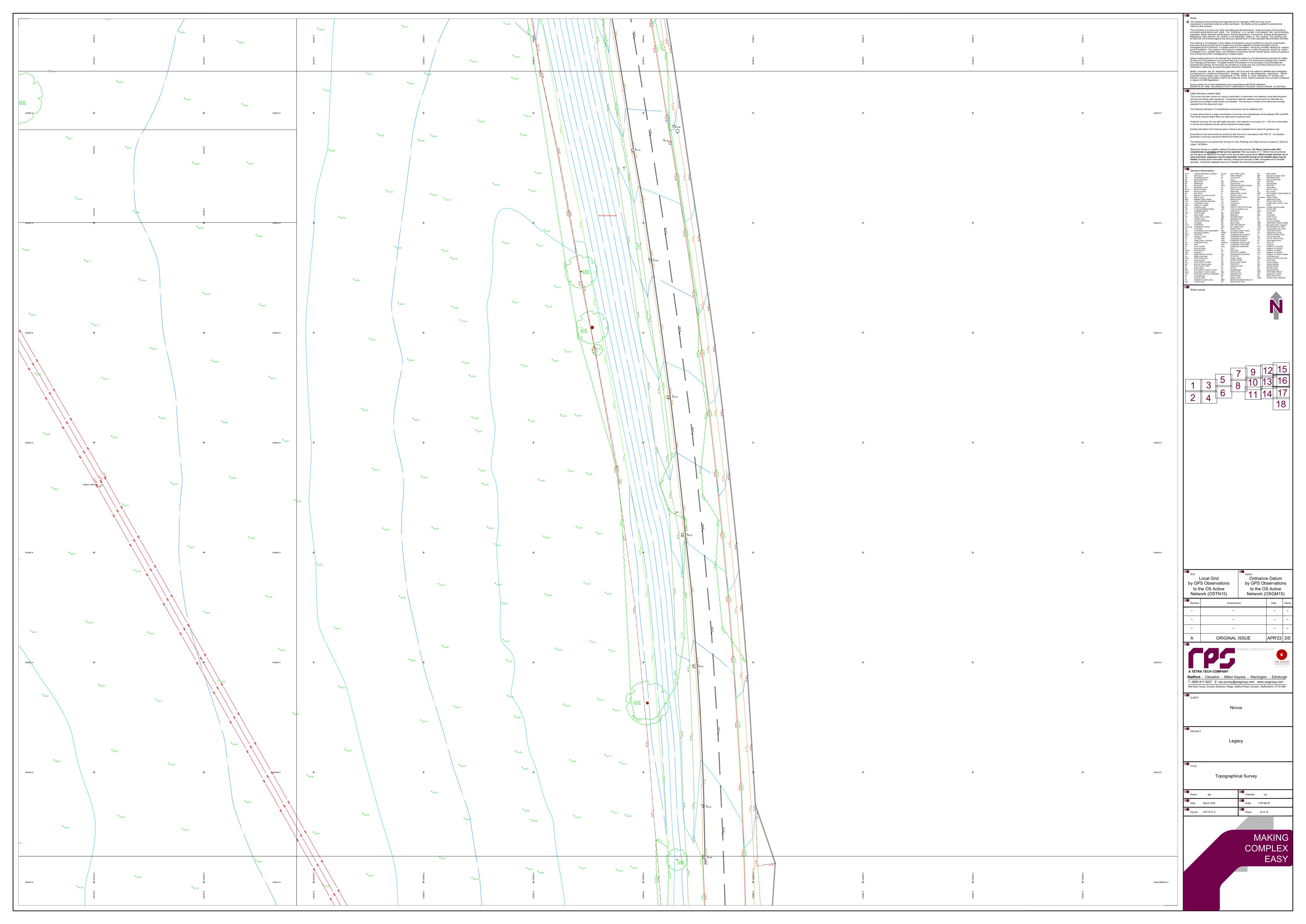


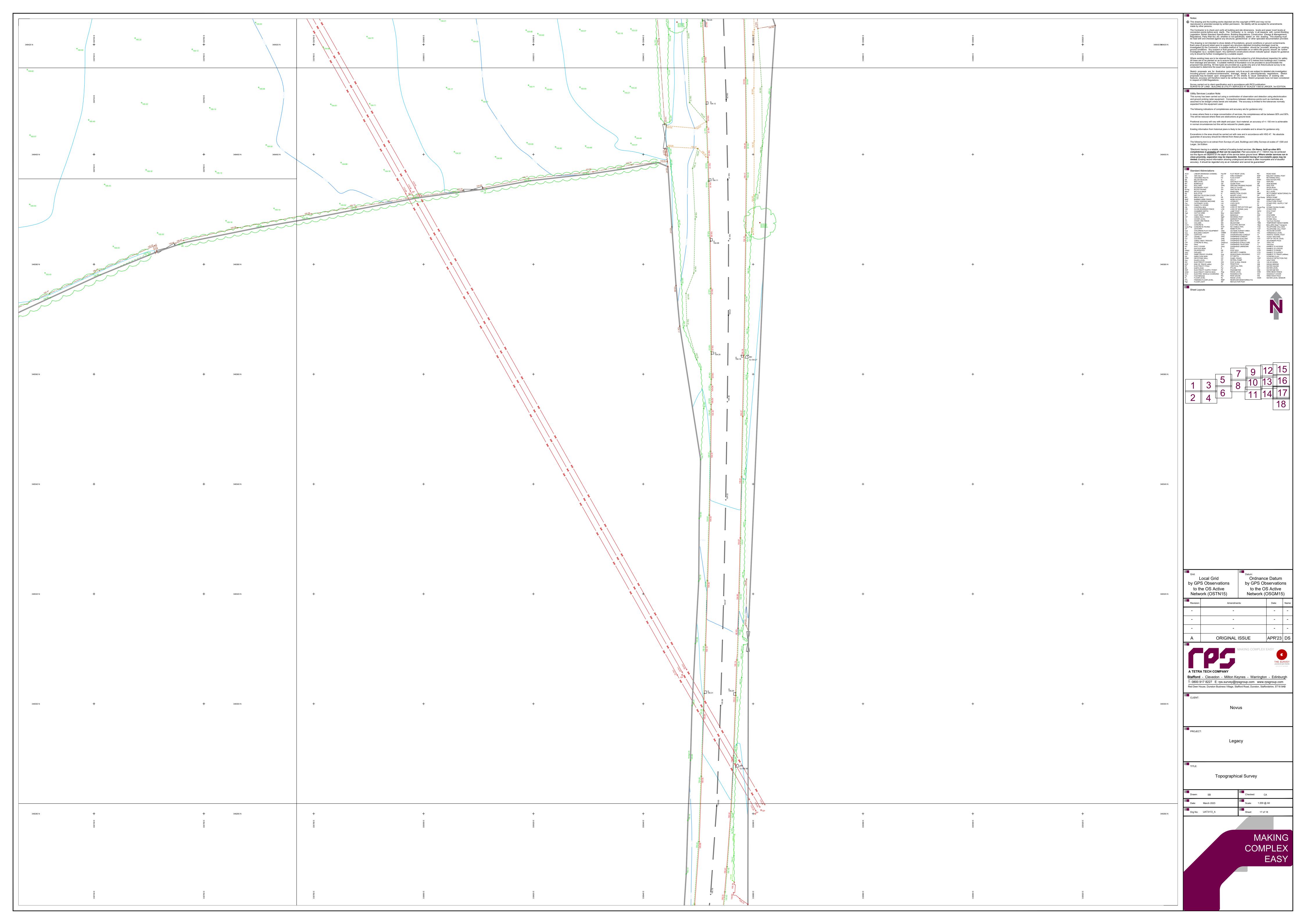


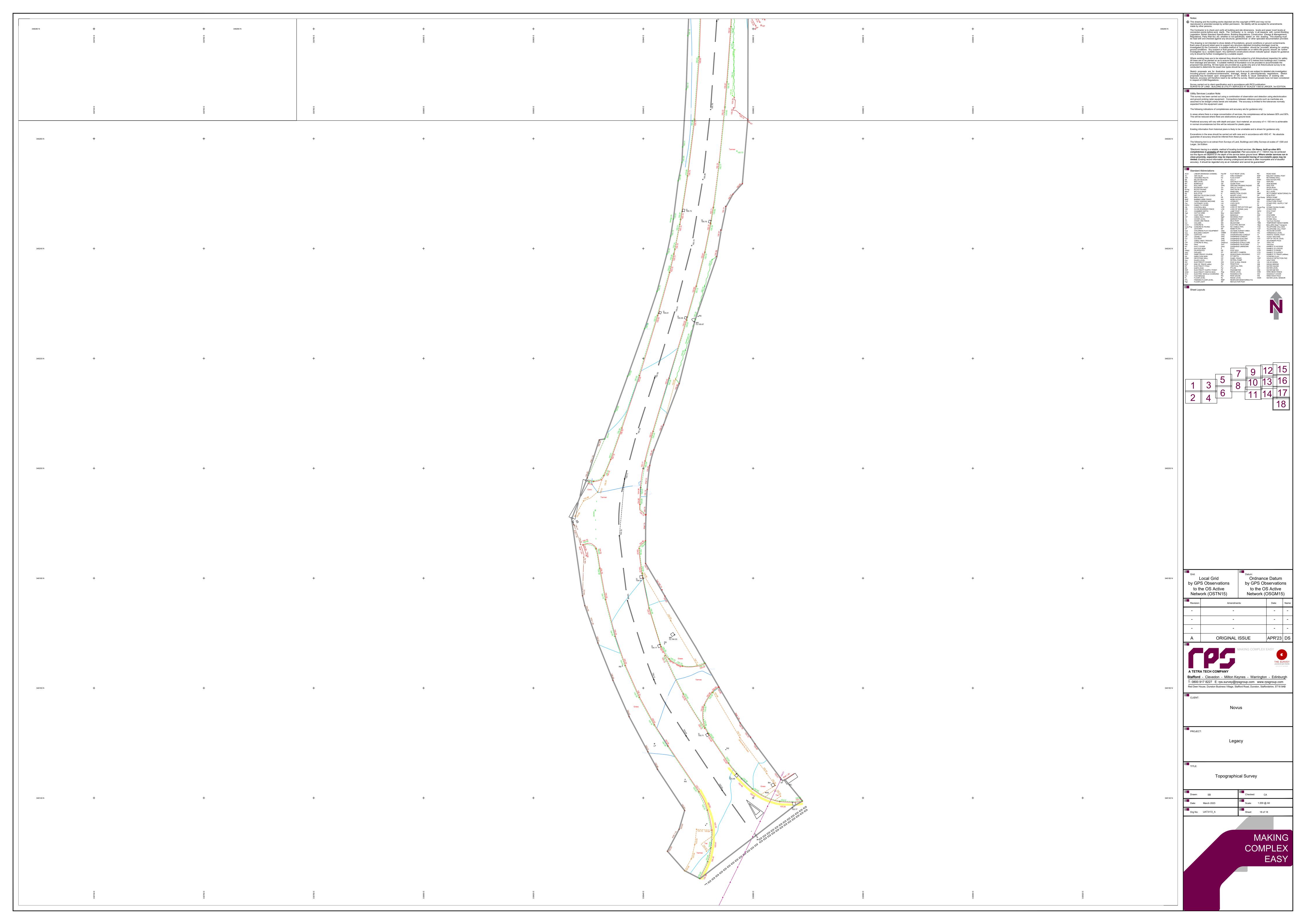






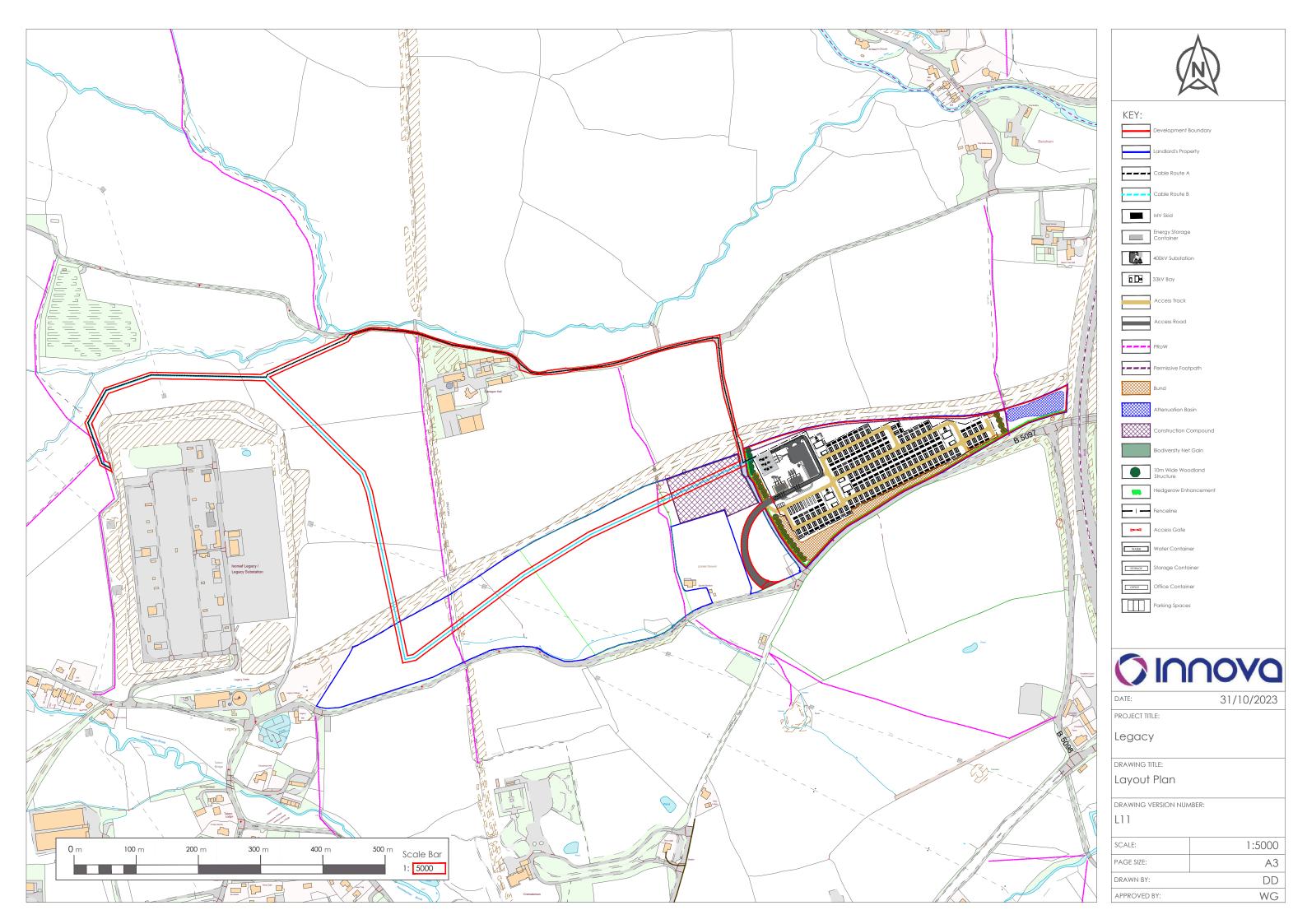








B Development Plans





C Extract of Utilities Search Report



Utilities Search





Thursday, 25 Aug 2022
Penny Brierley Ltd T/A X-Press
489507 IAP
LAND AT BRONWYLFA ROAD

91 Market Street Hoylake Wirral CH47 5AA Tel. 0151 632 5142 enquiries@cornerstoneprojects.co.uk www.cornerstoneprojects.co.uk VAT Reg. No. 851 4941 19 Company No. 5132353

Registered in England: Registered Address: Cornerstone Projects Ltd, 91 Market Street, Hoylake, Wirral CH47 5AA

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WATER

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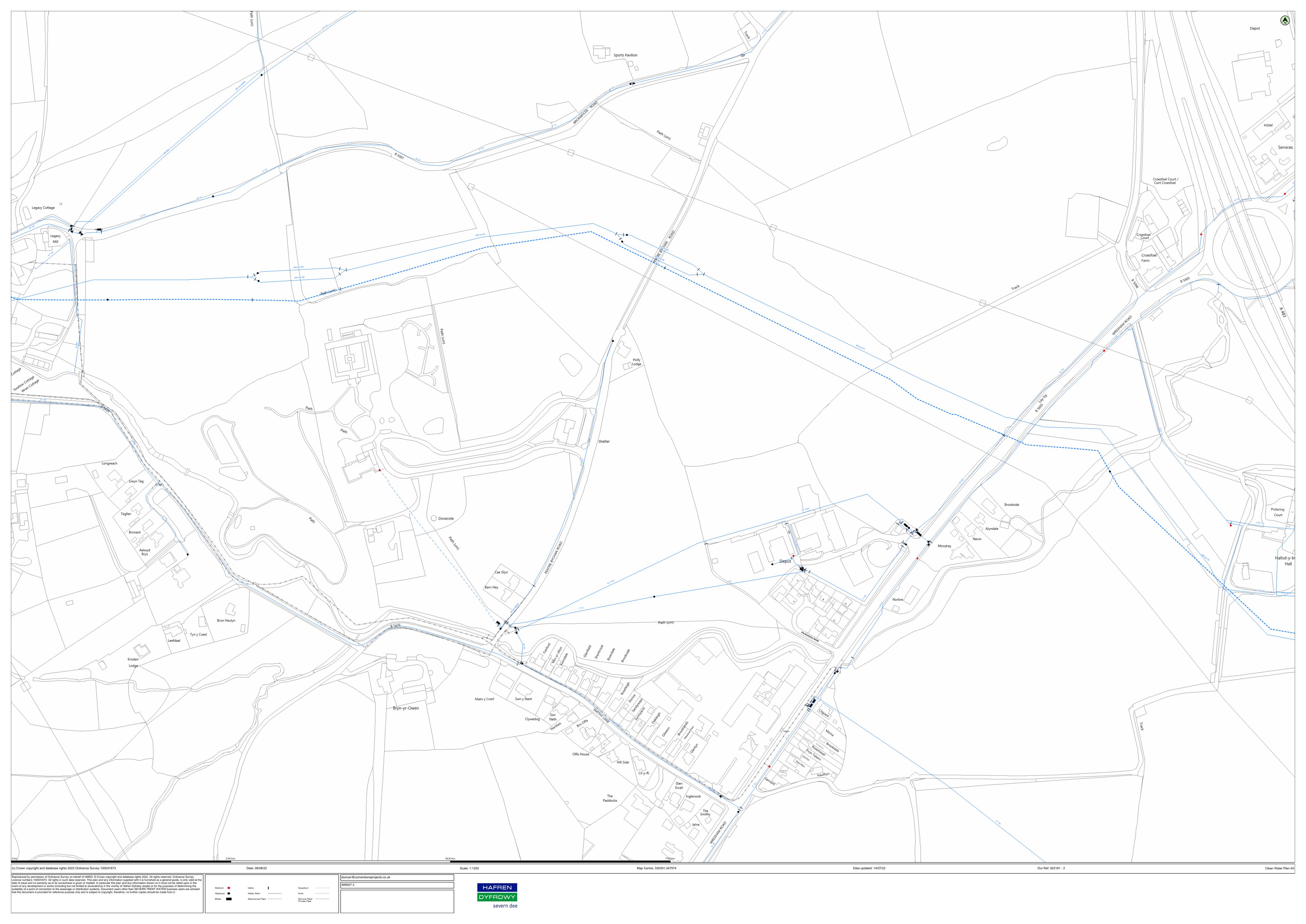
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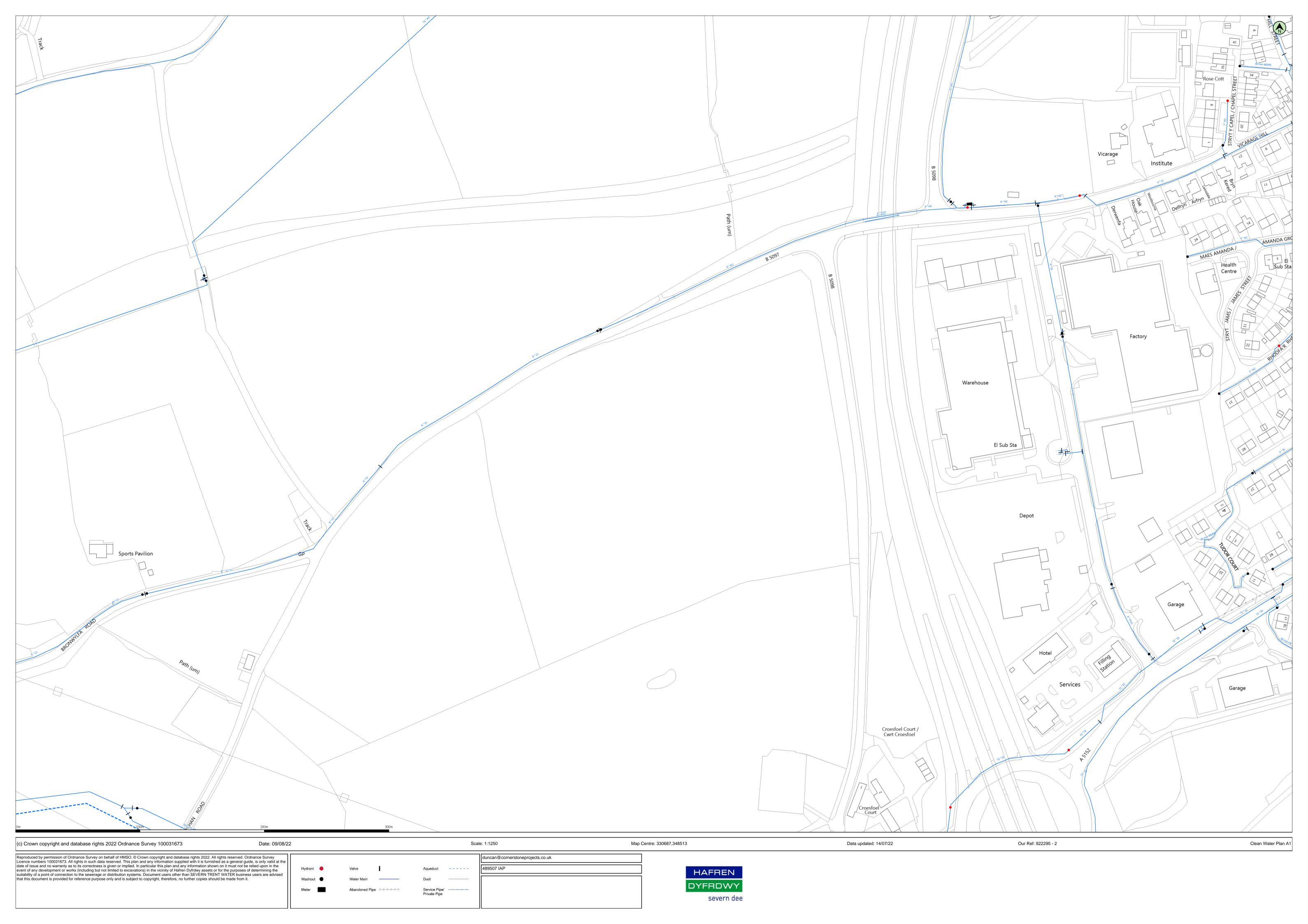
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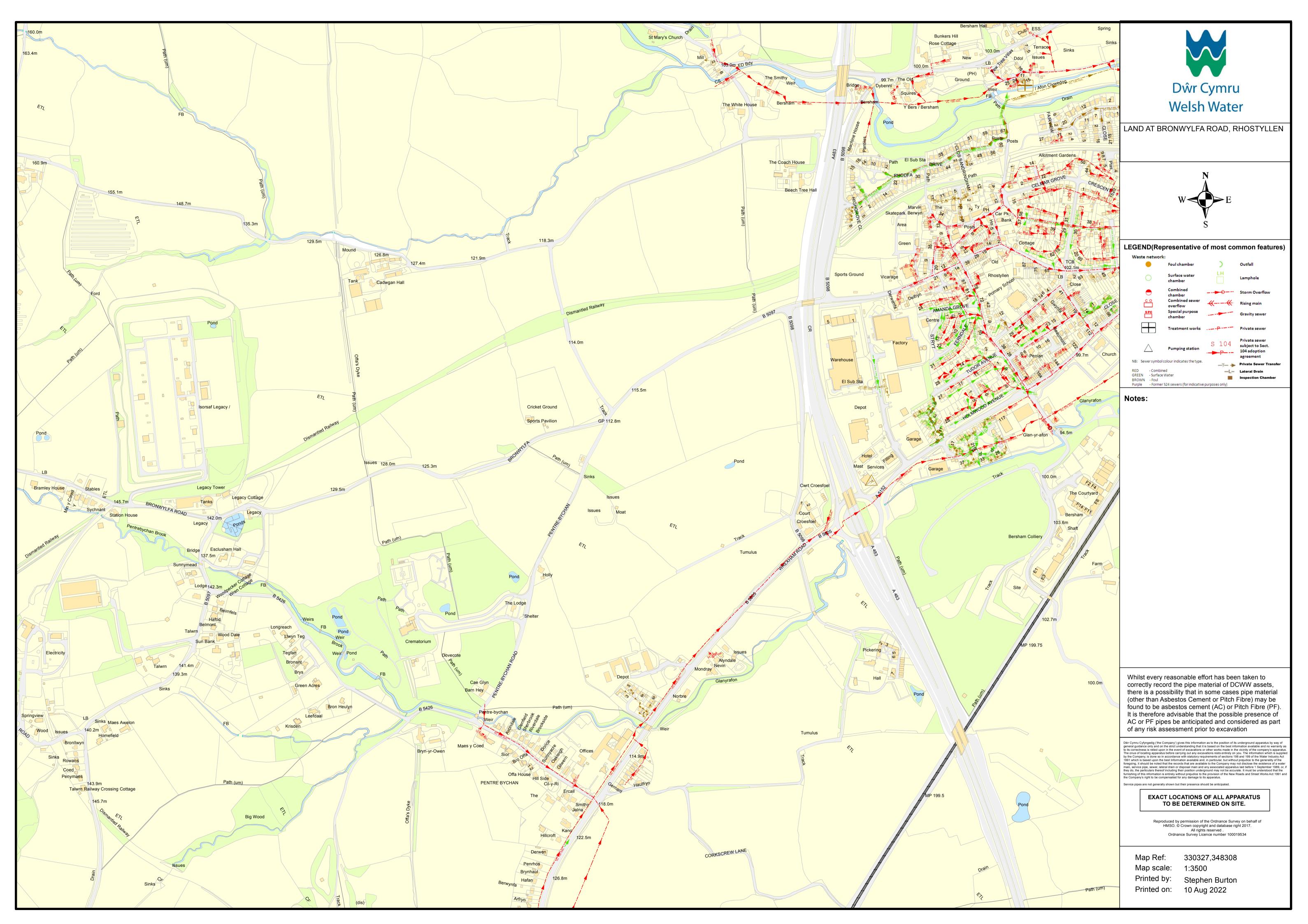
19. In certain circumstances, both HD and landowners may wish to plant shrubs/bushes in close proximity to a sewer, water main of other HD Apparatus for screening purposes. The following are shallow rooting and are suitable for this purpose: Blackthorn, Broom, Cotoneaster, Elder, Hazel, Laurel, Privet, Quickthorn, Snowberry, and most ornamental flowering shrubs.

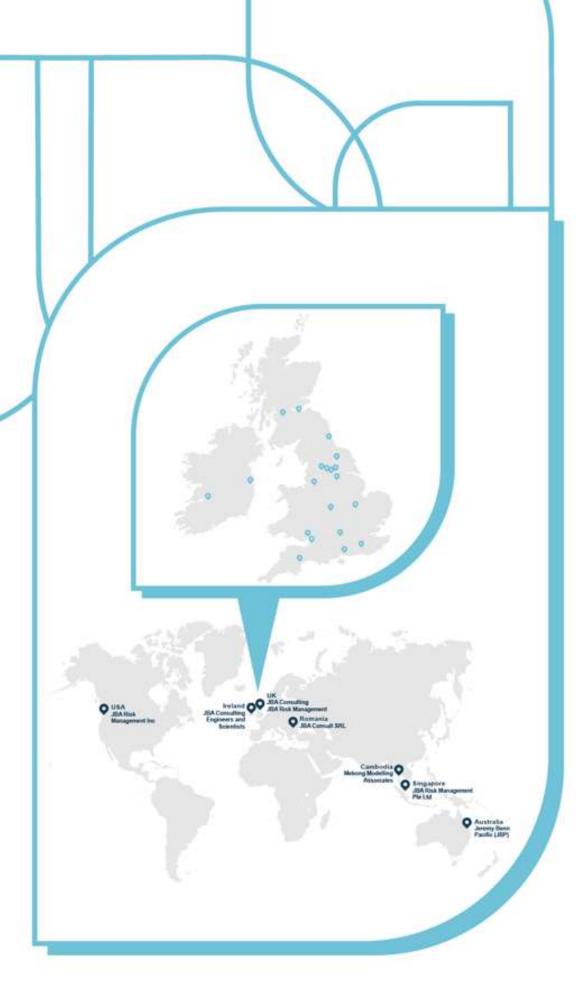


SEWER

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