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Eich Cyf/Your Ref	7500
Ein Cyf/Our ref	SAB/PRE/2020/0903
Dyddiad/Date	20 th October 2020
Gofynner am/Ask for	Carole Wright
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Dear Mr Hardy,

**Re. SAB/PRE/2020/0903 - Residential Development – Llwyneinion,
Rhosllanerchrugog, Wrexham, LL14 1TG**

Thank you for your recent SAB Pre Application advice submission.

I have reviewed the submitted information and have the following comments made in relation to the guiding principles and standards as contained within the Welsh Ministers standards. Please be advised that comments relate only to the surface water element of the proposal. Dwr Cymru Welsh Water should be approached for comments on the proposed foul network.

Principles:

The now Statutory Standards for SuDS in Wales list a number of principles which should underpin the design of compliant surface water management schemes. As previously discussed, the underpinning design principles (as fully listed within the section 2 of the Welsh Ministers Statutory Standards) for any SuDS schemes should aim to:

- Manage water on or as close to the surface and source of the runoff as possible;
- Ensure pollution is prevented at source, rather than relying on the drainage system to treat or intercept it;
- Use the SuDS management train, using drainage components in series across a site to achieve a robust surface water management system (rather than a single “end of pipe” feature such as a pond, to serve the whole development

Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh and this will not lead to any delay.

The scheme, as submitted, predominantly proposes to collect some of the surface water for reuse, a small element sent to soakaway, and to construct a proposed connection to a local watercourse network (no details of connection included within the application). Considering the existing use of the site, the proposal is considered sufficient in this instance to demonstrate compliance with the Welsh Ministers underpinning principles.

Standard S1 – Surface water runoff destination

The submitted information indicates surface waters will be managed by a combination of Priority Level 1 (collection) Priority Level 2 (infiltration to ground) and Priority Level 3 (discharge to surface water body). Infiltration to ground is proposed for a small element of the proposed development. No infiltration testing has been undertaken to indicate ground conditions are suitable for soakaway. These will be required to support any future application for full SAB approval.

The proposed surface water drainage system is shown to discharge into a local ordinary watercourse at an attenuated rate. This is deemed acceptable and in accordance with the destination hierarchy.

Standard S2 – Surface Water runoff hydraulic control

The scheme indicates attenuation will be provided to cater for the 1% rainfall event with an appropriate increase to account for climate change over the lifetime of the development. This is designed with an attenuated discharge of 5 l/s.

Details of extreme event exceedance management will be required to support any future application for full SAB approval.

Standard S3 – Water Quality

Whilst it has been highlighted that the pollution hazard level for intended land uses for the site are either low or very low, the submitted information indicates that the proposed SuDS features (permeable paving constructed in accordance with CIRIA guidance) will provide sufficient treatment prior to discharge to the ground / surface water body. This approach is deemed acceptable and accords with the requirements of the Welsh Ministers Statutory Standards.

Standard S4 – Amenity & Standard S5 – Biodiversity

It is essential that both amenity and biodiversity enhancements are delivered as part of the SuDS scheme proposed. These need to be attributable to the SuDS scheme and not the wider development. As such consideration should be given to additional SuDS features that will allow amenity and biodiversity benefits to be delivered. Initial review of the site layout does highlight areas of planting and greenspace that could potentially be incorporated into the SuDS scheme by incorporating swales, filter strips, raingardens and potentially surface attenuation/infiltration basins. The inclusion of such features will give multiple opportunities for shared use spaces that will deliver significantly more than just a drainage function. Any future application will need to better define the enhancements that will be delivered, accompanied by appropriate landscape/planting plans to detail how these benefits will be incorporated into the scheme.

Standard S6 – Design of drainage for Construction, Operation and Maintenance

Appropriately detailed information regarding construction, operation and maintenance and funding will need to be submitted to support any future application for SAB approval.

Conclusion

It is accepted that the proposed mechanism to use collection and infiltration techniques to manage surface waters generated on site is appropriate and accords with the Welsh Ministers Standards.

Any future application will also be required to provide significant additional detail with regards to Standards 4, 5 and 6. Any reconsideration of the highway drainage element of the scheme should give full consideration to delivering biodiversity and amenity benefits, which could easily be used to compliment shared use spaces on the site.

If you have any questions, or wish to discuss further, please don't hesitate to contact the undersigned. Please be advised that the above comments are the informal views of an Officer of the Council and do not commit the Council in the determination of any formal application for SuDS Approving Body approval that may be submitted.

Yours sincerely



Kevin Edwards

Arweinydd Tîm Streetscene
Streetscene Team Leader