

We are unable to discharge conditions for the proposed maintenance strategy. As the maintenance strategy is reliant on the outstanding points raised on application AB/54/22/DOC, these will need to be resolved prior to DOC for the maintenance strategy. In addition, the following points directly relating to the maintenance strategy provided must be addressed.

1. Please can you provide the evidence used to determine that jet washing and suction cleaning is sufficient to reinstate permeable paving to 90% efficiency.
2. Please include an additional line confirming that the joining aggregate should be replaced and that particular attention to the possible removal of this aggregate needs to be paid if jetting and suction equipment is removed. *(If the evidence listed above or type of surfacing used does not require this to be carried out this comment can be withdrawn)*
3. Modular crate system states “repair physical damage if necessary”. It is unclear to what standard such repairs need to be carried out too. This is requested to minimise the chance of maintenance personnel undertaking inadequate repairs. A statement detailing when the system may need replacing should also be included e.g. if performance or structure is compromised by damage.
4. Details of the management company are required. This must include, the name and contact details for the company.
5. Details of how maintenance will be funded, i.e. who will be paying for the ongoing maintenance should be provided? E.g. costs will be levied on residents and paid to the management company.
6. For the ditches and watercourses please ensure maintenance details are provided and that these include annual removal of tree saplings.
7. A section detailing maintenance and inspection of silt traps should be provided. This should include information on how to properly test and dispose of any silt removed from the site.
8. Maintenance of the headwalls should include details of maintenance to be carried out on any flap valves or other non-return valves.
9. Please detail inspection and replacement of any liners for the geo-cellular tanks.
10. Product specific maintenance details should be provided in case replacement is required. This is particularly important for the proposed suspended tank and in this case, we request contact details for the tanks fabricator / manufacturer be provided so that new parts can be fabricated on request of the management company if required.
11. Maintenance for the suspended tank should also include details of how access under the voids (via the grating) will be provided to maintenance personnel. The Environment Agency often request voids to be sealed to prevent occupants from using these spaces to store personal items, which can affect their operation during periods of flooding. It should be considered whether locked access is required in this case. Further to this, maintenance of this tank and access to the void spaces will need to include consideration of health and safety aspects including whether this access constitutes a confined space, if other risks are present, and whether specialist permitting and training prior to access into this space is required.

12. Please include maintenance specific to each of the proposed flow control devices, as well as details of the model make and manufacturer. The flow control maintenance will also need to include detail inspection, greasing and movement of bypass door on any hydro-brakes and the frequency of this.
13. The maintenance checklist should be bespoke, any elements that do not appear in the proposed drainage system should be removed from the checklist and any additional maintenance tasks that are required included. For example, specific mention of all flow control devices should be included to minimise the risk of maintenance personnel only inspecting and maintaining one of them. A section of the checklist should also be dedicated to tasks specifically relating to the suspended above ground tank.
14. To avoid confusion, the final issue of the maintenance strategy document should exclude the “for planning” maintenance information included within Appendix 1. Alternatively, it should clearly state that it is to be ignored by maintenance personnel. This is especially important as it includes information that is contradicted in earlier sections of the maintenance document (e.g. referring only to tanks, and suggesting infiltration will be used).