

Director of Environment & Infrastructure:
Mark Kemp



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Date 02 June 2020

RE: 5/2019/3022 - Smallford Works, Smallford Lane, Smallford, St Albans

Dear Sarah

Thank you for reconsulting us on the above application for the Outline application (all matters reserved) - Redevelopment of the site including demolition of existing buildings to provide up to 100 residential units at Smallford Works, Smallford Lane, Smallford, St Albans, Hertfordshire, AL4 0SA.

We acknowledge the submission of the following documents as additional information;

- Outline Drainage Strategy (prepared by RMA Environmental, Ref: RMA-RC1722c, Issue 6 Dated: 01.05.2020)
- Outline Drainage Plan (ref:C1722c, dated 30.04.2020)

LLFA position

Following a review of the above documents we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reasons

In particular, the submitted surface water drainage assessment fails to address;

1. Clarification of discharge mechanism
2. Provision of greenfield runoff rates.
3. Clarification of restricted discharge via a flow control device
4. Details of maintenance arrangements for the proposed shared SuDS features.

Overcoming our objection

1. The outline drainage strategy has been based on providing storage for the 1 in 100-year storm including a 40% allowance for climate change, with a discharge to the ditch along the eastern boundary of the site via an existing connection. We note that there is no information on the capacity of the ditch nor is it shown clearly on the drainage plans. In order to confirm a feasible discharge mechanism, we will require this information.

We note you've contacted highways regarding the proposed connection subject to agreement of a third-party landowner. We will require confirmation of this agreement in order to ensure the feasibility of the drainage scheme.

2. We note from the submitted outline drainage strategy that the development aims to discharge at a maximum rate of 10.3l/s which is the greenfield runoff rate for the 1 in 100-year event. As we understand that the proposed discharge mechanism is into a ditch and no information has been provided of its current condition or capacity, we would recommend that the site aim to discharge at the QBAR rate (calculated at 3.2l/s) or lower in order to reduce the risk of flooding to the proposed development and future occupants.
3. Following assessment of the drainage plan submitted; it was noted that a flow control device has been included on the proposed basin to restrict discharge to 3.7l/s. We understand that this discharge is from the roads only. The proposed geo-cellular storage units draining the remaining site area appear to be discharging straight into the ditch. As we have not been provided with any information on the existing condition and capacity of this ditch, we cannot assess the feasibility of the drainage scheme and the proposed discharge. As LLFA, we would expect that all surface water drainage from the site should be managed and the applicant should aim to discharge into the ditch at the calculated greenfield runoff rate.
4. The submitted Outline Drainage Plan (figure 3.1) reference C1722c indicates that the geo-cellular storage runs across multiple property boundaries, we understand that where SuDS serve more than one property it would be the responsibility of the developer to either maintain the SuDS themselves or to negotiate with or secure agreement of a third party to maintain these however, we require further clarification on this as the existing drawings detail all storage tanks running across the driveways of the proposed dwellings.

The drainage strategy proposes shared geo-cellular storage located in private curtilages which poses a high maintenance risk. We acknowledge that the applicant has stated that general maintenance arrangements for the different SuDS components and associated features will be maintained by a management company. We would advise that all the SuDS features should be located in areas which are publicly accessible or further information should be provided in relation to the right to access to ensure the works will be carried out.

We would also advise the LPA to seek further information on how the assets will be protected and ensure there is no future modification of the drainage asset. This

information should be provided to ensure that the assets are secured, and future buyers are aware of the proposed drainage features and their functions which serve multiple properties. It is up to the LPA to ensure that the development can be maintained for the lifetime of the development

For further advice on what we expect to be contained within the FRA to support an outline planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> this link also includes HCC's policies on SuDS in Hertfordshire.

Informative to the LPA

We note that all of the proposed geo-cellular storage tanks appear to be located across single private driveways which serve multiple properties. There is a high uncertainty that individual house owners will have the means to undertake the maintenance required by drainage features within their property. As the drainage system is serving more than one property, the lack of maintenance would affect several properties. We therefore advise the LPA that the information in relation to management of the drainage scheme does not demonstrate clear arrangements for the ongoing maintenance over the lifetime of the development for a significant part of the drainage scheme. However, it is up to the LPA to be satisfied that the drainage scheme can be adopted and maintained for its lifetime.

Please note if the LPA decides to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely,

Lilly Varnham

Landscape Officer
Environmental Resource Planning