



Hampshire County Council

Universal Services
The Castle
Winchester, Hampshire SO23 8UD

Tel: 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

Enquiries to	Susanna Hope	My reference	SWM/2023/0434
Direct Line	0370 779 8679	Your reference	F/23/95574
Date	9 August 2023	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

This response does not reflect the position of Hampshire County Council as the Highway Authority. If there is a potential for the drainage features to be offered for adoption, this will need to be discussed separately with Highways development planning as they might not be considered acceptable by the Highway Authority.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

The County Council has reviewed the following documents relating to the above application:

- **Reuby & Stagg Ltd/ Flood Risk Assessment and Drainage Strategy/REF 10583/June 2023**
- **Soils Limited/ Preliminary Site Investigation Report/19192 PIR_R26 Final/ May 2021**

This is a brownfield commercial site being developed as 9 apartments and 3 terraced houses. The original commercial site was entirely impermeable and discharged into the adjacent surface water sewer without any form of attenuation. The maximum discharge rate for the existing site is 14.5 l/s. The existing commercial development has already been demolished.

Director of Universal Services
Patrick Blogg

The proposed development is providing a reduction in impermeable surfaces by making the driveway and parking areas permeable paving and providing some limited greenspace. Surface water is being managed using attenuation tanks, a downstream defender and a 50mm diameter orifice plate before being discharged to a private surface water sewer.

We are please to see that the discharge rate from the site is being reduce below the previous brownfield rate to 4.4 l/s in the 1 in 100 plus climate change event. This should result in reduction of discharge rates of about 70%. A maintenance plan has been provided.

In order for us to provide a substantive response, the following information is required:

- **The surface water sewer being connected to was traced to a blockage.** The plans show that surface water is being discharged to an existing private surface water sewer that was traced to the northern end of the site before the trace was abandoned due to a blockage. It is not clear from the information submitted whether the blockage will be removed, and flow are able to discharge into the public sewer. The surface water must be discharged to a viable working connection otherwise the drainage system will not work. Please provide evidence that this private sewer is in working order and connects to the public surface water sewer.
- **Who maintains this private sewer being connected to?** The private sewer is located outside of the redline boundary. While a maintenance plan has been provided there is no mention of this private sewer. Please confirm who will be responsible for maintaining this private sewer going forward?
- **No urban creep allowance has been applied** because the FRA states that the development consists of apartments. However, there are 3 houses that strictly speaking should have 10% urban creep applied. Please update the calculations accordingly. Without this the impacts of urban creep will not be mitigated.
- **An incorrect climate change allowances of 40% have been applied.** Climate change allowances have recently been updated. <https://environment.data.gov.uk/hydrology/climate-change-allowances/rainfall>, an allowance of 45% should have been used withing the calculations. Please update the calculations. Without this the impacts of climate change have been underestimated and we are unable to confirm that any flooding in the 1 in 100 plus climate change storm event will be safely contained on site.
- **No simple index approach calculations have been provided.** These are required to ensure that sufficient water quality is being provided.

We require this further information before we can make a decision on whether to recommend to the Local Planning Authority that planning permission is granted.

As a statutory consultee, the County Council has a duty to respond to consultations within **21 days**. The 21-day period will not begin until we have received sufficient information to enable us to provide a meaningful response.

Please ensure all data is sent to us via the relevant Local Planning Authority.

If you require additional guidance on providing the correct information, we recommend you use our **Surface Water Management Pre-application service** which will enable discussions with the reviewing engineer and scope out works that would address the points raised. For full details, please visit:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning> and click on [pre-application advice request form](#).

This response has been provided using the best knowledge and information submitted by the applicant as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,



Flood and Water Management Team
Economy, Transport & Environment Department,
Hampshire County Council, 1st Floor, Ell Court West,
The Castle, Winchester, Hampshire SO23 8UD

Web:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding>

General guidance for the application

It is important to ensure that the long-term maintenance and responsibility for Sustainable Drainage Systems is agreed between the Local Planning Authority and the applicant before planning permission is granted. This should involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies.

For SuDS systems to be adopted by Hampshire Highways it is recommended that you visit the website at:

<https://www.hants.gov.uk/transport/developers/constructionstandards> for guidance on which drainage features would be suitable for adoption.

Where the proposals are connecting to an existing drainage system it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.

Works in relation to ordinary watercourses

PLEASE NOTE: If the proposals include works to an ordinary watercourse, under the Land Drainage Act 1991, as amended by the Flood and Water Management Act 2010, prior consent from the Lead Local Flood Authority is required. **This consent is required as a separate permission to planning.**

Information on ordinary watercourse consenting can be found at the following link

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/c/hangewatercourse>

It is strongly recommended that this information is reviewed before Land Drainage consent application is made.

For guidance on providing the correct information, we recommend you use our **Ordinary Watercourse Consents Pre-application service** and help avoid delays occurring at the formal application stage. A Pre-application service for Ordinary Watercourse Consents is available, allowing consents to go through in a smoother, often more timely manner. For full information please visit:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/c/hangewatercourse>