



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2024/0622
Direct Line		Your reference	RM/24/98388
Date	15 November 2024	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Reserved matters relating to layout, scale, appearance and landscaping of the proposed development pursuant to outline permission O/19/86980 for the construction of 49.no residential dwellings. at Land west of Allbrook Way, Allbrook, SO50 4LZ(Application No. RM/24/98388

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 was consulted in 2020 on the outline application for the development and previously reviewed document:

- Flood Risk Assessment & Drainage Strategy Job Number 6557 Issue 4 CEC July 2020

The LLFA raised no objection to the outline planning application which was subsequently permitted with conditions.

Director of Universal Services
Patrick Blogg

A reserved matters application has been submitted including supporting documentation including a revised drainage strategy.

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

- Drainage Technical Note for Reserved Matters Submission Version 1.1 Project 23823 October 2024
- Proposed Drainage Layout Plan - Sheet 1 of 3 Dwg 201 Rev B CEP 18 Oct 24
- Proposed Drainage Layout Plan - Sheet 2 of 3 Dwg 202 Rev B 18 CEP Oct 24
- Proposed Drainage Layout Plan - Sheet 3 of 3 Dwg 203 Rev B 18 CEP Oct 24
- Proposed Drainage Layout Plan - Whole Site Dwg 200 Rev B 18 CEP Oct 24
- Existing Site Levels Plan Dwg 48 CEP Oct 2024
- Proposed Levels Layout Plan – Sheet 1 of 3 Dwg 401 Rev B CEP Sept 2024
- Proposed Levels Layout Plan – Sheet 2 of 3 Dwg 402 Rev A CEP Sept 2024
- Proposed Levels Layout Plan - Sheet 3 of 3 Dwg 403 Rev B CEP Sept 2024
- Drainage Management and Maintenance Schedule CEP 17 Oct 2024

Following review of the above documents HCC as LLFA have the following comments:

The change in drainage strategy following site investigations that revealed poor soil infiltration rates is noted.

The flood risk assessment and drainage strategy submitted for the consented outline planning application for this development, proposed a discharge rate of 16.9l/s which was derived from the calculation of the Qbar greenfield runoff rate for a total site area of 3.3ha. The flood risk assessment also quoted a developed impermeable area of 1.3ha. The latest drainage model submitted has a an impermeable drained area of 1.213ha (confirmed in proposed drainage areas plan Dwg 43 Oct 2024). An assessment of runoff from areas not included in the model is also required, to include gardens and other green areas. If deemed necessary these areas should be included in the drainage model. If these green areas are not included in the model then they should also be excluded from the greenfield runoff calculation. Assuming the remaining 2ha of the site will continue to discharge via overland flow or via the proposed wetland, unrestricted, the total discharge from the site for the current proposals is expected to exceed Qbar. The drained area of the proposed drainage network should match the area used in the calculation of greenfield runoff that has been used to determine the allowable discharge rate.

Both of the offline attenuation tanks, as shown on the proposed drainage layout plan, are shown at a level lower than the carrier drain. After a significant storm event in which the attenuation tanks are filled with water, they will not be able to drain fully, back into the network. As the tanks are to be lined, this water will remain in the tanks, reducing the available capacity for the next storm event. For example: the attenuation tank upstream of node 33, has tank invert level labelled as 44.40, the downstream node invert level node 33 is labelled as 44.925. based on pipe lengths and gradients shown in the drawing the invert level of the outlet pipe from the attenuation tank is estimated to be approximately 45.00, the tank is 0.8m depth, following a storm event in which the tank is filled with water, only the top 0.2m of the tank will be able to empty back into the carrier drain network, the remaining 0.6m depth of water will remain trapped in the tank. Raising the tank design level above the invert level of the carrier network could cause the tank to break ground level in the southern corner. The model does not detail the offline storage but rather assigns a storage volume to the nearest downstream node where the hydrobrake is located and therefore this issue is not shown in the modelling results. Consideration should be given to access to the attenuation tanks for inspection and maintenance. Consideration should be given to venting of the attenuation tanks to allow escape of air while the tanks are filled with water. The LLFA has concerns that this design flaw could present an increased risk of flooding to the existing dwellings and to the highway close to the location of the proposed attenuation tanks.

The previously reviewed FRA and the latest drainage strategy both highlight the requirement for an agreement with Southern Water for the proposed discharge into the public surface water sewer. The FRA also stated “ *Southern Water have expressed they will not accept discharge / overflow from ponds / basin or any open water features into their system.*” As the previous infiltration strategy is not viable, the latest proposed discharge strategy appears to be contrary to what Southern Water would accept. The FRA also stated: “*Southern Water have confirmed that the existing system should be able to accept the development flows (both foul and restricted surface water at Qbar) without causing any capacity concerns.*” As mentioned above, it appears that the expected discharge from the site will exceed Qbar. Confirmation of an agreement with Southern Water is required, both in terms of the proposed discharge from open water features and the proposed discharge rate, to confirm the feasibility of the overall drainage scheme.

Confirmation of the location and invert level of the existing public surface water sewer in Knowle Hill is required to confirm viability of the discharge connection.

The presence of existing ordinary watercourses has been noted as shown on the existing site levels plan. The LLFA would expect all existing ordinary watercourses to be maintained and protected during the works, including watercourses that may have been neglected. If any works are proposed

affecting the existing ordinary watercourses then a consent is required as a separate permission to planning.

The proposed location of the downstream defender treatment device is not clear on the drainage drawings. Data sheets containing the pollution mitigation indices for any proposed proprietary treatment devices should be submitted.

A review of the Drainage Management and Maintenance Schedule is required. Regular maintenance of storage structures is not mentioned, consideration should be given to removal of silt or blockages from the storage structures as required. The LPA should confirm they are satisfied with the proposed arrangements for future maintenance of the drainage infrastructure being the ultimate responsibility of the future homeowners.

The results for the 1 in 1 and 1 in 30 + cc rainfall events has not been submitted in the hydraulic calculations as required by Condition 9 section c.

An allowance for Urban Creep has only been added to the proposed roof areas, an allowance has not been included for private driveways or garages.

There are inconsistencies between the exceedance flow route plan and the proposed levels plan in the northern section of the site. It must be demonstrated that the design levels will direct exceedance flow away for proposed dwellings.

Due to the nature of these concerns, 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 or whether condition 9 and condition 10 should be discharged.

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
Hampshire County Council,
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>