

Designer's Response



Project	Land West of Allbrook Way, Allbrook
Project Number	23823
Comments Received from	Hampshire County Council LLFA Team dated 6 January Ref SWM/2024/0622
Date Comments Received	6 January 2025
Date of Response	8 January 2025

Comment / Query from LLFA		Designer's response
1	This point is fundamental to the LLFA objection to this reserved matters application and has not been satisfactorily address in the designers response. The LLFA does not support proposals to increase surface water discharge from a site above existing rates. The calculation of greenfield runoff from the site was based on the whole area of the site. And the same whole area must be considered when calculating the proposed post development surface water discharge from the site. The runoff from undeveloped areas of the site have not been considered in the drainage strategy which is significantly different from the strategy proposed at outline planning stage. This requirement relates to increase in downstream flood risk regardless of whether the site is proposed to discharge to a sewer or a watercourse. As LLFA our primary concern is flood risk and an increase of discharge from the site represents an increased flood risk to areas downstream of the site that are already at risk.	The Flood Risk Assessment and Drainage Strategy by Cole Easdon has previously been considered and Outline Planning Permission granted. The calculations include positively drainage areas only limited to 16.9l/s which is the strategy established at Outline Planning and covered by Condition 9 of the Planning Approval.

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	<i>[Response Continued]</i> The principle established in the Cole Easdon Consultants Flood Risk Assessment and Drainage Strategy are as follows: • Coles Easdon established that a discharge rate of 16.9 l/s to the public sewer was acceptable to Southern Water and the site drainage system would be restricted to that rate for the 100 year plus 40% climate change event. • Cole Easdon established a hard paved area of 1.1ha plus 10% for Urban creep. • Cole Easdon Micro Drainage Calculations (Appendix 6 of the FRA) have a total drained area of 1.465ha and restrict the discharge from the drained areas of the site to a peak of 16.9l/s for all storm events up to the 100 Year +40% climate change event. • There is no inclusion of undeveloped areas within the Cole Easdon calculations in the approved FRA and Drainage Strategy. • The Cole Easdon Calculations used FSR rainfall data and Cv values of 0.84 winter and 0.75 summer. • Cole Easdon FRA stated <i>'the proposed discharge rate (16.9l/s) is approx. 70% lower compared to what the existing greenfield site currently generates in the 100-year event (54.1l/s).'</i> • The Cole Easdon report sets a peak discharge rate to the public sewer of 16.9l/s for the 100 year plus 40% Climate Change event storm.

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	<i>[Response Continued]</i> Planning Condition 9 notes 'No development shall commence until a detailed surface water drainage scheme for the site, based on the principles within the submitted Flood Risk Assessment and Drainage Strategy (Cole Easdon Consultants, Ref: 6557, Issue 5, November 2020), has been submitted and approved in writing by the Local Planning Authority.' The Reserved Matters Application has therefore been progressed as follows: • Maintained the previously agreed discharge rate to the public sewer at 16.9l/s as established in the Outline Planning Approval. • Detailed drainage calculations have been undertaken for the positively drained areas, including 10% urban creep for roof areas, totalling 1.213ha. This is in the range between the 1.1ha and 1.465ha noted by Cole Easdon in their Drainage Strategy and Calculations. • The detailed design uses FEH rainfall data and Cv values of 1 in both summer and winter to bring the scheme in line with current drainage guidance. • Climate Change allowances have been uplifted to 45% in line with current drainage guidance. • Sufficient storage has been provided for the agreed peak discharge to the public sewer of 16.9l/s for the 100 year plus 45% climate change event has been provided. The uplift to FEH data, Cv=1 and 45% climate change allowance provides betterment to the drainage scheme established at Outline Planning Permission.

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		<i>[Response Continued]</i> The submitted drainage details and calculations meet the principles established in Flood Risk Assessment and Drainage Strategy (Cole Easdon Consultants, Ref: 6557, Issue 5, November 2020) as noted above and therefore meet the requirements of Planning Condition 9.
2	We note that the error in the tank levels has been addressed for the tank upstream of 42 CP. However the same error has been made on the tank upstream of 43CP and this does not appear to have been addressed. The LLFA comment referred to both attenuation tanks.	Noted, this is an error. Revised drawings 200H, 201G, 202G and 203G are attached. The crate invert levels upstream of 43P are set at 45.063m AOD approximately 138mm higher than the downstream hydrobrake manhole (44.925m AOD) to allow the storage to drain.
3	The LLFA raised this point for the LPA to consider to ensure that Southern Water were consulted. It is technically outside our remit and it is for Southern Water as Water authority to approve the connection. We raised this due to the previous response from Southern Water at outline planning stage. We request confirmation of the connection approval to demonstrate the proposed discharge point and therefore the proposed drainage scheme is feasible.	Noted and as previously confirmed Southern Water agreed the rate of 16.9l/s from a basin as part of the outline application. The OFWAT ruling in 2018 made it clear that it is no longer a prerequisite to check available capacity. For this site however Southern Water confirmed 16.9l/s was available to the public sewer. That agreed discharge rate has been used within the surface water calculations undertaken in support of this Reserved Matters Application and is as agreed at Outline Planning Approval.
4	The additional survey information for the existing public surface water sewer provided has been reviewed and this confirms the location and level of the proposed connection. The information is sufficient to address our comment.	Noted.
5	Noted	Noted.
6	The information provided is sufficient to address our comment.	Noted.
7	The information provided is sufficient to address our comment.	Noted.

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8	The information provided is sufficient to address our comment.	Noted.
9	The information provided is sufficient to address our comment.	Noted.
10	The applicant has requested further clarification regarding the LLFA comment relating to the exceedance flow plan. This comment relates to the access road at the far north of the site (North of proposed building labelled LAR): the exceedance flow plan shows a flow arrow East to West while the proposed levels plan indicates flows would be directed West to East. This is a discrepancy. The levels design of the parking bays to the North of this building is of minor concern as the area is relatively flat. If a localised flood were to form in this location then there could be some degree of flood risk to the buildings, particularly if the design levels are not met exactly when constructed. This could be easily resolved, with minor changes to the design levels.	Noted, there is an error on the direction of the exceedance flow route arrow at the north of the proposed buildings. The exceedance from that permeable paved area will be to the east mimicking the existing exceedance route in that area. Drawing 47 A - Exceedance Flow Route Plan has been updated to reflect this.