



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2023/0561
Direct Line		Your reference	APP/23/00665
Date	23 October 2024	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Erection of a 78 bed older persons care home (Use class C2) together with construction of new access road, car/cycle parking, drainage works, hard/soft landscaping and other associated infrastructure. at Land on the east side of Helmsley House, Bartons Road, and west of Normandy Way, Havant(Application No. APP/23/00665

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:

- Proposed Drainage Layout Sheet 1 of 4 – NJP - 11063-500 Rev T1 - April 2024
- Proposed Drainage Layout Sheet 2 of 4 – NJP - 11063-501 Rev T1 - April 2024

Director of Universal Services
Patrick Blogg

- Proposed Drainage Layout Sheet 3 of 4 – NJP - 11063-502 Rev T1 - April 2024
- Proposed Drainage Layout Sheet 4 of 4 – NJP - 11063-503 Rev T1 - April 2024
- Drainage Construction Details – NJP - 11063-504 Rev T1 – April 2024
- Drainage Construction Details – NJP - 11063-505 Rev T1 – April 2024
- Flood Risk Assessment and Drainage Statement October 2023 Issue C 17/10/23 Infrastructure CS Ltd
- Proposed Site Levels Plan – Charles Adams – 09/01/22 PL1 11.07.24

Having reviewed the submitted documents, HCC as LLFA are unable to provide a substantive response as the information provided is insufficient. In order for us to provide a substantive response, the following information is required:

The LLFA previously commented in October 2023, before outline planning permission was granted and these comments remain unanswered.

The LLFA previously highlighted that the risk of flooding from surface water map indicates a flow route through the site where the building is proposed. This risk has been identified in the Flood Risk Assessment and the FRA states that this risk has been mitigated as the flood flow route bypasses the building and follows the proposed access road. This assessment in the FRA does not appear to be correct. An overlay of the flood maps with the development proposal plans shows that the existing flood flow route passes through the proposed building footprint. The application must include evidence of how the potential surface water flood flow will be directed around the proposed building. Based on the information provided to date, it appears there would be an unacceptable level of flood risk to ground floor rooms on the north elevation of the proposed building. As a minimum an external levels plan is required which indicates proposed external surface levels and falls and finished floor levels. We suggest that 2D modelling may be required as evidence to show how surface water flows are to be managed.

The LLFA previously raised concerns regarding the excessive half drain down time for the attenuation tanks as shown in the submitted hydraulic model reports. Consideration of follow on storms, and explanation of proposed mitigation is required, up to date hydraulic modelling reports should be submitted.

The LLFA previously commented that an exceedance flow route drawing was required to be submitted. A pre and post development plan is required to indicate overland flow routes based on the topography / built levels and demonstrating flows will not be directed in new locations and affecting properties. Flows within the development must be routed away from new properties. Details of finished floor levels, road camber and kerb heights may be required.

The FRA states that the agreed discharge from the application site into the adjacent Bellway site is 2.5l/s and that another development to the North is also proposed to discharge a further 2.5l/s to this same lateral connection point. Further explanation of this is required.

It is not clear how the proposed land drains would connect to the network and which areas they are intended to drain. Further details are required.

A plan indicating assumed drained areas used to build the hydraulic model is required for verification.

The proposed construction detail for the access road is not clear, it is assumed that this is to be impermeable surfacing due to the road gullies on the drainage layout. Evidence of suitable pollution mitigation for the surface water runoff from the proposed access road must be provided.

We would draw your attention to the consultee response from HCC highways: the LLFA shares some of the same observations and supports the comments raised by the highway authority.

In general, the poor standard of the drainage drawings makes it difficult to see the connectivity in the proposed drainage network. Numerous pipe connections do not coincide and some parts of the network are not clear. A sense check of the drawings is required before they are resubmitted.

The latest revision of the flood risk assessment and drainage statement revision C appears to be incomplete and does not appear to contain all of the appendices. Most notably Appendix F the hydraulic design calculations do not appear to be attached. There were concerns raised by the LLFA regarding the hydraulic calculations submitted previously in revision B of the FRA and drainage statement. The hydraulic calculations previously submitted do not appear to relate to the latest design as shown in the proposed drainage layout drawings. We assume the drainage calculations have been updated for revision C and need to see them before we can provide a response.

The submitted details should include:

- a. A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment.
- b. Detailed drainage plans to include type, layout and dimensions of drainage features including pipe, chamber and attenuation tank references to link to the drainage calculations.
- c. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change. Simulation results should include critical results by return period. Appropriate climate change allowance should be applied to the 1 in 30 year and 1 in 100 year design storms.
- e. Evidence that urban creep has been included within the calculations.
- f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.

- g. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

We require this further information before we can make a decision on whether to recommend to the Local Planning Authority that discharge of condition 7 and 9 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
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>