



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2025/0033
Direct Line		Your reference	APP/24/01010
Date	17 April 2025	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Proposed employment development, with associated access, parking, yards and landscaping. at Interbridges Site, New Brighton Road, Emsworth(Application No. APP/24/01010)

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>

HCC as LLFA were consulted previously on this application and provided comments in our letter dated 10th February 2025. We have been reconsulted following receipt of additional information.

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

- Letter– Response to LLFA comments- Bellamy Roberts 13th March 2025

Director of Universal Services
Patrick Blogg

Following review of the above document HCC as LLFA has the following comments:

Flood Risk Mapping

The updated EA flood risk maps are now available to view. The applicant can now update the maps for flood risk from rivers and can assess the implications for the proposed scheme. The updated maps appear to have corrected the discrepancy identified by the applicant in the site flood risk assessment however the maps still indicate part of the site is within flood zone 2 and 3.

We note the changes to the EA maps of flood risk from surface water. Our previous comment regarding development in identified areas of surface water flood risk also apply to areas subject to flood risk from rivers.

Flood Risk form Groundwater

The Lead Local Flood Authority do not agree with the broad assessment of typical groundwater levels described in the above document. Groundwater levels can peak earlier than suggested. As infiltration is not proposed, winter groundwater monitoring could be conditioned by the LPA as the applicant suggests, but, due to the high groundwater levels identified we recommend winter groundwater monitoring is required before granting planning permission.

The plan showing the location of the borehole and results of the groundwater monitoring is not enclosed in the above document as stated (or not available to view).

Access Road Drainage

The information provided is sufficient to address our previous comment, however we note the revised proposed surface water drainage strategy plan is not enclosed in the above document as stated (or not available to view).

Routing of Perforated Pipes

Comments are noted. We await submission of amended drainage drawing for review.

Hydraulic Calculations - Network Model

We await submission of the network model for review. We previously commented that it is not appropriate to model a pump as if it were a hydrobrake as was in the previously submitted hydraulic calculations. This is because the discharge characteristics of the two features is different. The hydraulic calculations submitted previously are not considered to be representative of the design and therefore the table of existing and proposed discharge rates at the end of the above document is also not considered to be applicable.

External Levels Plan

We await submission of the external levels plan.

Maintenance Plan

The additional information provided in the above document is not sufficient to address our previous comment. This can be dealt with by condition applied to any granted planning application.

Proposed Point of Discharge

Our previous comment regarding the proposed discharge point referred to the proposed discharge into the southern water sewer being different from the existing site discharge. The above document states that the existing site does not discharge to the river to the East of the site as we had assumed but no explanation has been provided for the existing site surface water point of discharge. Non-Statutory technical Standards for Sustainable Drainage recommend drainage systems should be designed to mimic natural drainage flow pathways. The NPPF hierarchy of drainage options states discharge to a watercourse is preferred over discharge to public surface water sewer. The applicant should provide explanation of the existing site discharge point, whether discharge to the river has been considered and reasoning for why this is not considered to be appropriate as evidence of compliance with the NPPF. The drainage scheme proposes to discharge below greenfield runoff rate but to a different location.

The above document references a previous planning application (APP/16/00295). Although the previous application did include a pump, the proposed discharge was not to the southern water sewer. The previous application is not relevant to this application or our comments.

The LLFA would always prefer a gravity system over a pumped system where this is achievable but we would not object to a proposal that includes a pump if this is the only available option.

We await confirmation of agreement with Southern water for the proposed discharge location and rate.

From the responses in the above submitted document it appears the applicant may have misunderstood some of our previous comments. We hope the above provides further clarity. Some of the additional information referred to in the above document is to be submitted separately and is required for us to be able to review the proposals and provide a substantive comment.

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
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>