



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2025/0033
Direct Line		Your reference	APP/24/01010
Date	23 June 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 letters dated 10th February 2025 and 17th April 2025. We have been reconsulted following receipt of updated information.

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

- Letter to LLFA – MT/6096 Bellamy Roberts 20th May 2025

Director of Universal Services
Patrick Blogg

- Revised Flood Risk Assessment MT/6096/FRA.3 Issue 3 Bellamy Roberts 9th May 2025

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

The Flood Risk mapping has been updated to reflect the latest Environment Agency data. The updated fluvial flood risk maps have been overlaid on a site plan in appendix 8 of the above updated flood risk assessment. This shows that part of Block A, the whole of Block B, and significant areas of service yard / parking areas / access road are all located in identified areas of flood risk. As explained in our previous comments, development should be located outside of areas of flood risk and if development is proposed in these areas, flood compensation areas will be required and details on how the topography will be altered to ensure new development is not at risk. Modelling may also be required to support this. As the identified flood risk is from rivers, the Environment Agency will be able to provide further advice.

The proposed attenuation tank is also partially within the area of fluvial flood risk and fully below the peak flood level. Our understanding is that in the event of a river flood the surface water drainage network would be inundated and would not function. In this event without a functioning surface water drainage system, the discharge from the site would exceed the existing greenfield runoff rate and the downstream flood risk would be increased.

In the event of river flooding, the proposed drainage network would collect the flood water via the gullies, permeable paving, pipes and tank and the pump would activate, pumping river flood water into the public surface water sewer. The Water Authority are best placed to comment on this risk, but we assume this arrangement would not be acceptable.

A response from Southern Water dated 02 April 2025 has been included in the enclosures of the above letter. We note the Water Authority have confirmed adequate capacity in the existing surface water sewer. The Water Authority also require that the hierarchy for surface water as explained in their letter is followed. The LLFA also require that the hierarchy of preferred drainage discharge options is followed as described in the NPPF and other statutory regulations and non-statutory guidance. As explained in our previous letters we consider that the hierarchy has not been adhered to and therefore cannot agree with the proposed discharge point at this stage.

We previously requested further groundwater monitoring data covering the winter peak. Following review of the submitted data collected in May 2024 including the plan showing the location of the boreholes, we still have concerns that the peak may not have been recorded and that potentially high groundwater levels may enter the surface water drainage network. As with river flood water, any groundwater entering the surface water drainage network would be pumped into the public sewer. As stated in our previous

responses our recommendation is that winter groundwater monitoring should be requested before planning permission is granted.

The applicants previous response to our comments relating to the access road drainage have not been incorporated into the drainage strategy layout or the updated flood risk assessment. Gullies are not shown. The proprietary treatment device is not shown or included in the water quality assessment. The proposed drainage system will not provide adequate levels of surface water treatment prior to discharge to the public sewer without the proprietary treatment device recommended in the designers previous letter dated 13th March 2025.

The routing of the permeable paving perforated pipes is now shown on the drainage strategy drawing. We note the modelled maximum water level in the attenuation tank is close to the existing ground level in the corner of Yard B. Our assessment is that the most likely point of flood emergence in a surface water exceedance event is through the surface of the permeable paving.

Hydraulic calculations have been revised. We note the pump is still modelled as a hydrobrake, please refer to our previous comments. We note 100% porosity has been used in attenuation crates which is not representative of these products.

We previously requested an external levels plan to include proposed finished floor levels. We note this has not been provided as levels have not yet been designed. We advise that surface water drainage and flood risk management should be key considerations of the levels design. External levels are required to assess flood risk and surface water flow routes.

We consider that our previous comments have not been adequately addressed and that the proposed drainage strategy is not appropriate for the site. We have particular concerns regarding the proposed drainage strategy in relation to building in areas of identified flood risk and the proposed discharge location. A suitable surface water drainage strategy and appropriate flood risk management have not been demonstrated.

Due to the nature of our concerns, we are not satisfied that flood risk has been assessed appropriately or a suitable surface water drainage strategy proposed. We would advise to the Local Planning Authority that planning permission is not granted until these matters are resolved.

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>