



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2023/0561
Direct Line		Your reference	APP/23/00665
Date	7 January 2025	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 LLFA were consulted on this application and provided a response in a letter dated 9th October 2023. In this response the existing surface water flood risk in the site was raised and further information was requested in the form of a drawing overlaying the surface water flood map with the proposed site layout. This information was not provided at the time. The flood risk assessment stated the following:

Director of Universal Services
Patrick Blogg

“The risk of flooding due to overland flood flows is considered low by the Environment Agency. The surface water flood data for the site, shown below, indicates that there is a low risk through the development site, however this has been mitigated as the proposed flow route replicates the access road serving the building, and as such, any flows will bypass the building and run through the site following the existing route.”

This statement is unclear and open to misinterpretation, but it implies that the surface water flow route would be maintained as existing and that this route coincides with the proposed access road. It makes no specific mention of diverting the surface water flood flow path.

The applicant has made reference to a consultation response from the LLFA dated 27th October 2023. To clarify the LLFA position: this response was provided using the best knowledge and information submitted by the applicant as part of the planning application at the time of responding. In light of further review and the new information submitted by the applicant, the LLFA **withdraws** the comment in our letter dated 27th October 2023.

The application was granted February 2024 with conditions.

The LLFA were reconsulted in October 2024 on the discharge of conditions application. The issue of the existing surface water flood risk to the site was raised again. Further review highlighted the risk to the proposed building. Please refer to LLFA consultee response letter dated 23rd October 2024.

The LLFA were reconsulted in December 2024 following receipt of updated information in support of the discharge of conditions application. The additional information provided did not satisfactorily address our comments regarding existing surface water flood risk. Please refer to LLFA consultee response letter dated 9th December 2024.

The LLFA has now been reconsulted following receipt of updated information in support of the discharge of conditions application.

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

- Overland Flow Review Plan 11063-509 NJP Dec 2024
- Agent Response to LLFA Response – Conditions 7 & 9 13/12/24
- Update from NJP in relation to conditions 7 & 9 11/12/24

We are also in receipt of e-mail correspondence direct from the applicant which has not been formally submitted. This correspondence includes a revised version of the Overland Flow Review Plan:

- Overland Flow Review Plan 11063-509 Rev A NJP 17 Dec 2024

Following review of the above documents submitted in response to the LLFA comments on surface water flood risk from existing surface water flood overland flow routes, the LLFA has the following comments:

The Overland Flow Review Plan overlays the EA surface water flood map with the proposed site layout, providing the information requested by the LLFA in October 2023. This illustrates that the existing surface water flood flow route coincides with the proposed building footprint.

The Overland Flow Review Plan also indicates the proposals for management of any surface water flood flow along the existing flow path. A “boundary upstand protection” consisting of upright 450mm paving flags with varying upstand between 150mm and 400mm is proposed. Overland flow heading South is proposed to be intercepted by the flags and redirected 90 degrees to the East. We would question the effectiveness of this proposal. The flow is then proposed to be directed by the flag paving upstand along the site boundary towards a single yard gully which is proposed to discharge direct to ground via the pipe bedding material of the proposed drainage network. We note this is not a direct connection to the proposed drainage network which would not be appropriate. As previously established in the approved flood risk assessment, infiltration testing undertaken concluded that the site would not support an infiltration discharge strategy. This proposed arrangement is not considered to be an effective or appropriate method of discharge. The yard gully and connection will be prone to blocking by siltation. If the flood flow is unable to discharge as proposed it will be retained by the proposed flag paving upstand and the proposed paving and access road. There is potential for water levels to build up on the site boundary to a level close to the proposed finished floor level before it is allowed to overflow into the proposed access road.

We consider the current proposals to manage the existing surface water flood flow route within the site are unsuitable. We are concerned that the proposals do not manage flood risk to the proposed building but also may increase flood risk outside of the site boundary by restricting the existing surface water flow path route.

As explained in our last response dated 9th December 2024, a full review of the all submitted documents relating to surface water drainage has not been undertaken by the LLFA, and the LLFA does not wish to carry out further review of the drainage design including the hydraulic modelling and provide any further comments until the existing surface water flood risk of the site has been satisfactorily considered and addressed.

Due to the nature of our concerns, we maintain our holding objection based on surface water flood risk to the proposed building and also the increase in flood risk to the north of the site. Until suitable proposals have been submitted to demonstrate that this flood risk can be managed, the LLFA cannot 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>