



Hampshire County Council

Universal Services
The Castle
Winchester, Hampshire SO23 8UD

Tel: 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

Enquiries to	Scott Glover	My reference	SWM/2025/0033
Direct Line		Your reference	APP/24/01010
Date	10 February 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>

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

- Flood Risk Assessment MT/6096/FRA.2 - Bellamy Roberts 29th November 2024
- Drainage Strategy Plan 6096/101 Rev A 27/11/24

Director of Universal Services
Patrick Blogg

Following review of the above documents HCC as LLFA are unable to provide a substantive response as insufficient information has been provided. In order for us to provide a substantive response, the following information is required:

The submitted flood risk assessment notes that the Environment Agency mapping indicates that part of the site lies within flood zone 2. While we understand the reasoning why the applicant would question the accuracy of the flood maps in this location we cannot draw the same conclusion that the whole site would be within flood zone 1. We recommend that advice is sought from the Environment Agency to clarify the fluvial flood risk to the site. Modelling may be required.

Part of the site including Yard B and Block B is subject to surface water flood risk as indicated on the Environment Agency Flood Maps for Surface Water. This has not been identified in the submitted flood risk assessment. Development should be located outside of any areas of flood risk identified from any source. If development is proposed in these areas, 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.

The site is located in an area susceptible to groundwater flooding.

There is concern that groundwater levels could rise beyond the levels recorded during May 2024. Given the site topography, it is unlikely that lining of the permeable paving will be effective if groundwater levels rise close to ground level.

It is not clear from the submitted drainage layout how the proposed access road is to be drained. Assuming it will be drained by conventional road gullies, this would not provide adequate levels of water treatment. An assessment is required in accordance with the simple index approach as described in Ciria 753 the SuDS manual, which should cover each area of the development.

Perforated pipes connecting the permeable paving subbase to the attenuation tank are not indicated on the drainage layout plan. It is not clear how the permeable pipes draining yard B would be routed around Block B.

The hydraulic calculations must be based on a network model assessment with the different components defined appropriately. It is not considered appropriate to model a pump discharge as a hydrobrake.

An external level plan including proposed finished floor levels is required in order to review the exceedance flow plan provided. Elevation plans indicate block A floor levels are to be consistent while external paved areas appear to be variable.

A maintenance plan for the whole drainage system, not only the permeable paving is required. The LLFA can propose suitably worded planning conditions to be included in any granted permission.

The drainage network is proposed to discharge via pump to a Southern Water public surface water sewer to the West of the site. The LLFA note that the existing site would naturally discharge to the river to the East of the site just outside of the site boundary. The drainage strategy does not appear to be in line with the drainage discharge hierarchy as described in the submitted flood risk assessment paragraph 3.2. To provide confidence in the viability of the drainage strategy, the LLFA requires confirmation that Southern Water have been consulted on this proposal and that an agreement is in place with respect to the proposed connection and discharge rate.

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/cangewatercourse>

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/cangewatercourse>