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Date	25 September 2024	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

**Outline planning application for a residential development of up to 90 dwellings with access from Laxton Leaze and emergency access from Ellisons Crescent and all other matters reserved. at Land of North of Fire Station (Blue Star Land), Waterlooville
(Application No. APP/23/00471)**

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 3rd Issue July 2024
- SUDS DESIGN DOC GTWVILLE_BSL-DOC_03_A Planning May 2023 issue A 03/04/24

Director of Universal Services
Patrick Blogg

HCC as LLFA have the following comments:

The FRA includes a copy of the EA surface water flood risk (appendix E), however, the map used appears to contain incorrect data and appears to be flood risk from rivers rather than flood risk from surface water. As explained in the previous LLFA consultation response, the site has a surface water flow path with low risk of surface water flooding which should be taken into consideration both in the flood risk assessment and in the design of the proposed development. The FRA table 5.1 states natural flow paths to be maintained, to mitigate against surface water flood risk, however the latest illustrative masterplan indicates a proposal to culvert the existing watercourse which is inconsistent.

The microdrainage model results report has not been produced in a simple format and contains a lot of duplicate pages of information. In future submissions a more concise microdrainage model report format including the critical results by return period would make review simpler and quicker. Climate change has not been applied to the 1:30 year return period design storm. All storm durations up to 10080 have not been applied to the simulation as stated in the Suds Design Document. Although small volumes of managed local flooding is acceptable in the drainage network for the 1:100year + cc design storm, in this case the model is provided as evidence to confirm adequate size of the pond and attenuation structure. The storage features must be sized to store the 1:100+cc design storm. Flooding observed in the results (in particular Network A), indicates the design storm has exceeded the capacity in the upstream network and the flooded volume is effectively lost from the model. Therefore it is not clear whether the attenuation features have been adequately sized. A plan showing the drained areas as used to build the microdrainage model is required to verify the modelling. We are satisfied that the modelling demonstrates that using FEH rainfall parameters, captures the worst case and therefore FSR parameter simulations do not need to be included in future model submissions for this development.

There are discrepancies in the calculation of design discharge rate and the development drained area, which raises concern whether the model accurately represents the drainage strategy design, or whether the strategy adequately restricts the flow of surface water from the development. The Suds design document table 4.1 states development drained impermeable area of 1.06ha, and the microdrainage model includes a total drained area of 1.1ha (0.784ha + 0.316ha), however an area of 1.48ha has been used to calculate the design discharge rate. Whether the total area of the site including the green areas or only the impermeable areas are modelled, the design discharge should not exceed the pre development greenfield runoff rate for the same area, so the total drained area in the microdrainage model should equal the area used to calculate the design discharge rate. The calculation for design discharge rate appears to contain an error: 5.06×1.48 does not equal 9.9l/s as stated. We have concerns that the applicant has over estimated the allowable discharge rate from the site and as a consequence the flow controls

may have been oversized and the storage structures may have been undersized. In the absence of a plan showing the drained areas used in the microdrainage model, it is not possible to review further. A design review by the applicant of the design discharge calculation and drainage model is required and any future submissions should be presented with a plan showing the drainage areas used in the model and a concise format microdrainage report.

The maintenance schedule is noted. Details of maintenance of the proposed underground attenuation tank has not been included. Details of how the tank is to be maintained and protected from siltation is required.

As commented on in the last consultation response, as LLFA, HCC would be the consenting authority for works to ordinary watercourses. The proposals shown in the latest illustrative Masterplan indicate culverting of a significant length of the existing watercourse within the site to allow construction of a proposed car park. In principle, applications including culverting for car parking would be turned down as it is not considered essential for access. The watercourse in question conveys runoff from green areas as well as unquantified flows of surface water from adjacent developments through the site. The watercourse is also subject to low risk of surface water flooding. The proposed development masterplan should be reconsidered to determine how the existing watercourse can be retained as an open channel and accommodated within the development. Short lengths of culverting for access or **minor** realignment to fit round the development proposals would be considered, but longer lengths of culverting would be refused.

We are satisfied with the outline principles of the development but have a number of concerns with some of the details of the development proposal and the drainage strategy as explained above. We recommend that until the issues identified are considered and amendments made the LPA should refuse permission.

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>