



# Hampshire County Council

*Economy, Transport and Environment Department  
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|---------------------|--------------------|-----------------------|----------------------------|
| <i>Enquiries to</i> | Santiago Manzanero | <i>My reference</i>   | SWM/2020/0048              |
| <i>Direct Line</i>  | 01962 846777       | <i>Your reference</i> | APP/19/01226               |
| <i>Date</i>         | 6 February 2020    | <i>Email</i>          | SWM.consultee@hants.gov.uk |

Dear Sir/Madam,

**Construction of 44 dwellings with access, open space, landscaping and associated works at Land west of Coldharbour Farm Road, Emsworth.**

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.

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; CCE/X781/FRA-03; dated: July 2019.
- SURFACE WATER MANAGEMENT STRATEGY - ABOVE GROUND; DRAWING NUMBER: X781 - PL - SK – 303; dated: 28/06/2016.
- SURFACE WATER MANAGEMENT STRATEGY - BELOW GROUND; DRAWING NUMBER: X781 - PL - SK – 304; dated: 28/06/2016.

The information submitted by the applicant in support of this planning application indicates that surface water runoff from the application site will be managed through permeable paving, cellular tanks and grassed filter drains. Additionally, surface water will be discharged to the West Brook at a maximum rate of 2.3 l/s.

*Director of Economy, Transport and Environment*  
**Stuart Jarvis BSc DipTP FCIHT MRTPI**

The submitted information shows that the proposals, if developed according to the surface water management drawing, will remove the existing ordinary watercourse that runs through the application site. This is not something that we would support as existing watercourses on site should be retained as open channels with only bridges/culverts to enable access.

Removing the existing watercourse without a detailed assessment could increase flood risk on and off site and therefore, we **request** a detailed assessment of the impacts associated with filling the existing watercourse. This assessment should include findings of a 2-dimensional hydraulic modelling (existing and post-development scenario) which demonstrate that flood risk will not be increased on or off site. The assessment should also include additional information on the ordinary watercourse as it could potentially be draining or conveying water from other sites or developments.

The West Brook is adjacent to the application site and as a consequence, the site is within the extent of Flood Zones 2 and 3. It is a designated Main River, making the management of the flood risk associated with it responsibility of the Environment Agency (EA).

It is our understanding, from the information submitted by the applicant, that proposed compensatory flood storage is "indirect storage", which has been already agreed with the EA. However, the information submitted also states: "The compensatory plans and calculations in this report are based on a detailed layout and thus differ from the initial results submitted to the EA."

Therefore, and bearing in mind the similarities between the fluvial and pluvial flood risk, at this stage we **request** that the Environment Agency fully agree to the proposed compensatory flood storage and to any required post-development fluvial modelling. This is also as the post-development flood levels should be included in the hydraulic calculations (surcharged outfall).

We note that no hydraulic calculations have been submitted with the drainage strategy drawing. We **request** that hydraulic network calculations are provided to assure us that the proposed system can store and manage surface water at the proposed discharge rates without increasing flood risk on or off site. The hydraulic calculations should take into account the connectivity of the drainage system. They should show a 'like for like' discharge rate between the existing and proposed scenarios during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events.

The detailed hydraulic calculations should also include a surcharge outfall based on the predicted post-development 1 in 100-year flood level showing how that will be managed safely. The applicant should identify how they will prevent river water entering the surface water system.

The proposed drainage strategy (above and below ground) show individual cellular storage systems and permeable paving on private driveways. This

arrangement could present problems of maintenance and could compromised the capacity of the entire drainage system due to high chances of the private ways being paved over by householders during the lifetime of the development, thus potentially increasing future flood risk. To address this, the applicant should consider more centralised attenuation features.

Bearing in mind that this is an application for full planning permission and the layout will be fixed, we **request** that the above issues are addressed at this stage and not through planning conditions, to demonstrate that the quantum of development is achievable, whilst ensuring that flood risk will not be increased on or off site.

Given the complexities of this site, we would suggest that the applicant may want to consider engaging ourselves and the Environment Agency in a joint meeting to take this site forward however this is likely to be a chargeable service. If you would like to take advantage of this, please follow the guidance for our Pre-application service or contact us on the details at the top of the letter. For full details of our **Surface Water Management Pre-application service**, please visit:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning> and click on [pre-application advice request form](#).

We would also recommend that the applicant is directed to our website <http://www3.hants.gov.uk/flooding/hampshireflooding/drainagesystems.htm> for further information on recommended surface water drainage techniques.

Please note that Hampshire County Council as Lead Local Flood Authority will not comment on the fluvial systems as these are outside our remit.

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.

This response has been provided using the best knowledge and information submitted 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  
Economy, Transport & Environment Department,  
Hampshire County Council, 1st Floor, EII Court West,  
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Web: <http://www3.hants.gov.uk/flooding/watercourses.htm>

## 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 <http://www3.hants.gov.uk/flooding/hampshireflooding/watercourses.htm>*

*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/WatercoursePreApplication>*