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<i>Date</i>	10 February 2020	<i>Email</i>	SWM.consultee@hants.gov.uk

Dear Sir/Madam,

Demolition of retail unit and associated outbuildings and construction of a 3 storey building consisting of 1No retail unit with 4No one bedroom flats fronting Elm Grove and a 3 storey, sheltered housing, building consisting of 19No one bedroom and 20No two bedroom assisted living accommodation with associated car parking and external works to the rear at 108-110 Elm Grove, Hayling Island, PO11 9EN.

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:

- SITE SPECIFIC FLOOD RISK ASSESSMENT WITH DRAINAGE STRATEGY LEVEL 2; dated: December 2019.

The information submitted by the applicant in support of this planning application indicates that surface water from the application site will be managed through porous paving and on site sub-terranean surface water attenuation. Additionally, surface water will be discharged to the adjacent surface water sewer at Elm Grove. This is acceptable in principle since the infiltration testing undertaken showed that infiltration is not feasible at the site.

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

The submitted information indicates that surface water will be discharged close to natural greenfield rates, however, it is unclear which discharge rates the applicant is proposing and seeking for approval. This is also unclear bearing in mind the bad resolution and low quality of the Flood Risk Assessment document on the planning website.

The submitted Source Control calculations shows maximum discharge rates of 4.5l/s which is still in excess of the 1:200 greenfield rate (3.92 l/s). Given the potential issues with system blockages at very low discharge rates, we would be willing to agree with a 2l/s discharge but as it stands, the discharge is too far above greenfield rates to be considered in accordance with best practice.

The applicant is proposing to discharge surface water runoff to the Public Sewer Network, however, there is no evidence within the submitted information to demonstrate that Southern Water has agreed to the proposed connection and discharge rate. Considering the implications of the discharge rates on the detailed drainage design, at this stage we **request** that the discharge rates are confirmed in consultation with Southern Water.

The submitted drainage layout and MicroDrainage calculations are very high-level bearing in mind that this is an application for full planning permission. We require more details on the proposed surface water for full planning applications as the development layout will be fixed, thereby reducing future opportunities to make space for water within the layout.

Therefore, at this stage we **request** the following additional information/clarification on the submitted information:

- **Drainage layout drawings** at an identified scale (minimum 1:500) indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths and gradients.
- Detailed **hydraulic calculations** for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage system, including the connection to the public sewer network, and inform the design of the surface water drainage strategy. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus 40% climate change allowance) rainfall events. The drainage features should have the same reference that the submitted drainage layout.
- Evidence that **runoff exceeding** design criteria has been considered. Calculations and exceedance flow diagram/plans must show where above ground flooding might occur and where this would pool and flow.
- Information evidencing that the correct **level of water treatment** exists in the system in accordance with the Ciria SuDS Manual C753.

- Evidence that **Urban Creep** has been considered in the application and that a **10%** increase in impermeable area has been used in calculations to account for this.
- **Maintenance regimes** of entire surface water drainage system including individual SuDS features, including a plan illustrating the organisation responsible for each element. Evidence that those responsible/adopting bodies are in discussion with the developer. For larger/phased sites, we need to see evidence of measures taken to protect and ensure continued operation of drainage features during construction.

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 application site has a secure outfall to dispose surface water and to demonstrate that the quantum of development is achievable, whilst ensuring that flood risk will not be increased on or off site.

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.

For guidance on providing the correct information, we recommend you use our **Surface Water Management Pre-application service** which provides clear guidance on what is required for us to recommend that planning permission is granted and consider the works as best practise. 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 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,
 The Castle, Winchester, Hampshire SO23 8UD
 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>*