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<i>Direct Line</i>	01962 846730	<i>Your reference</i>	APP/17/00369
<i>Date</i>	5 July 2017	<i>Email</i>	SWM.consultee@hants.gov.uk

Dear Sir/Madam,

Outline planning application for the demolition of existing building and erection of a three-storey block of thirty-one flats, together with associated car and cycle parking. at The Curlew, Petersfield Road, Havant, PO9 2HU

Thank you for consulting us on the above planning application. Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application as our statutory consultee role in relation to:

- Surface water drainage for major developments

Surface Water Drainage

We have reviewed the following information in relation to the planning application:

- Drainage Strategy Report (Ref:W01651-Issued June 2017)
- Hampshire County Council(HCC) letter dated 9 May 2017 (letter ref: SWM/2017/0277)

Having reviewed the drainage strategy report we note that there is no public surface water sewer adjacent to the immediate boundary of the site and it is not known where the existing surface water drains to.

The proposed surface water drainage report mentions that the surface water from external areas drains into the ground via infiltration, however the surface water from the roof area discharges to public sewer via attenuation system. However this does not in itself constitute an appropriate or adequate surface water strategy.

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

There is no clear evidence suggesting that infiltration will be feasible for this site. Also there is no supporting evidence of an acceptable connection or discharge rate approved by Southern Water.

Also the following elements which were highlighted by the HCC previous letter are not addressed in the drainage strategy report, therefore we require following information to be provided:

- Evidence that the applicant understands the sensitivity of any of the discharge points in relation to the sensitivity of the receptor. Where this is main river or discharging through contaminated land the LPA may have to consult the EA.
- Where infiltration is used for sustainable drainage of the site, evidence must be provided that shows that a suitable number of tests have been completed across the whole site within different geology and to a suitable depth (i.e. a similar depth to the proposed infiltration devices) The tests should be completed according to the BRE 365 method.
- The impact of climate change, 40%, is required to be taken into account.
- Given the site is located in the groundwater Source Protection Zone 1c (SPZ1c) for the Havant and Bedhampton Springs sufficient information on the correct number of treatment stages in the surface water management train is required to be incorporated, for further information see the Ciria SuDS Manual (C753)

The drainage strategy clearly does not follow the Building Regulations hierarchy for the discharge point. Therefore, in the absence of a clear surface water strategy we recommend to apply a (holding) objection to the current application, and recommend refusal due to insufficient details of the proposed surface water.

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.

Please note that the mechanism for securing long-term maintenance will need to be considered and agreed between the applicant and the Local Planning Authority. This may 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.

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.

Kind Regards

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