



Hampshire County Council

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Enquiries to	FWM team	My reference	SWM/2017/0178
Direct Line		Your reference	APP/16/01237
Date	11 April 2017	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Demolition of 6,111 square metres of redundant chalets and facilities buildings, use of land for the siting of 204 holiday caravans including 5 caravans for use as staff accommodation, refurbishment of retained single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment of remainder of central facilities building, CCTV cameras, provision of new pedestrian concourse with terraces, splash and dry play areas, multi-games court, adventure golf course and outdoor theatre and new landscaping. Retaining existing pitch and putt golf course to the east of the site. at Mill Rythe Holiday Village, 16 Havant Road, Hayling Island, PO11 0PB

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:

- Works in relation to ordinary watercourses
- Surface water drainage for major developments

Surface Water Drainage

We have reviewed the following documents in relation the drainage strategy of the proposed development.

- Flood Risk Assessment (including appendices)

The FRA document fails to propose details of a drainage strategy and no illustration of such a strategy has been provided. In addition, the FRA report would not provide key information of the site and proposed development in

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order to be able to provide a valid response. Until the provision of a surface water strategy and required information to the Lead Local Flood Authority we cannot comment on the application submitted.

We recommend the applicant to consider the following elements:

- The existing flow paths and drainage regime of the existing site and likely areas that might be affected if the existing drainage regime fails (i.e. tidal lock occurrence)
- Total permeable and impermeable area before and after development
- Crest level of flood defiance along the proposed site
- Finished floor level has been based on the maximum surface water flooding following the tidal lock of outfall(s). No details of the calculations have been provided. More importantly, where the tidal flooding with sever implications is the main flood risk, how could it be justified to use the flood level associated with the surface water flooding as a base for setting finished floor level?
- It has been proposed the flood level within the site following a breach scenario would be 0.4. No details have been provided
- When taking into account sea level rise associated with 100 years of climate change the flood depth along the evacuation route could be up to 2.42m in a 1 in 200-year (plus climate change) flood. No Safe heaven has been considered on the site. Given that some flooding events (breaching or overtopping) might occur in a short period of time without sufficient time for proper alerts, risk to people and assets (e.g. cars) would be high if there is no safe access/egress route and safe heaves on the proposed site
- Existing and proposed run-off rate calculations should be provided, along with evidence that these calculations have been completed according to a suitable method (e.g. IH124 or FEH available from [UK Sustainable Drainage: Guidance and Tools](#)). These calculations should demonstrate that the proposed run off rate for a one in one year event and a one in one hundred year event plus climate change do not exceed the existing run-off rates
- Whilst the FRA acknowledges that the holiday park are the riparian owners of the defence and recommend its maintenance regularly, it is not clear if agreements are in place to ensure that this maintenance will take place, or if there are any plans to raise the wall in the future
- Evidence that exceedance flows and runoff in excess of design criteria have been considered - calculations and plans should be provided to

show where above ground flooding might occur and where this would pool and flow.

- Information on general maintenance regimes of the surface water management train including SuDS features, and who is going to be undertaking it – evidence that those maintaining the drainage system are in discussion with the developer.

Ordinary Watercourse

Where the proposals include works to an ordinary watercourse, under the Land drainage Act 1991, as amended by the Flood and Water Management Act 2010, a prior consent of the Lead Local Flood Authority is required for this work. This consent is required as a separate permission to planning.

Information on 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.

Please note, surface water drainage proposals will need to be assessed in relation to the impacts of climate change. The appropriate allowances are detailed in the latest advice from the Environment Agency [Flood risk assessments: climate change allowances](#). This updates previous climate change allowances to support NPPF. The proposed system should be tested for the peak rainfall intensity for the central and upper band in relation to the relevant development lifetime.

We would also expect to see a suitable allowance for urban creep, this factor reflects the future predicted increase of urban development, and with it, the increase of the impervious area. An allowance of 10% on impermeable areas is suitable in relation to confirming that the proposed system is acceptable.

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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