



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2022/0198
Direct Line		Your reference	APP/21/01351
Date	26 August 2025	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

**Outline application for erection of up to 60 dwelling units with access; associated landscape and highway works on land south of Saltmarsh Lane, and all other matters reserved.
at Land south of Saltmarsh Lane, Hayling Island, PO11 0JT(Application No. APP/21/01351**

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>

HCC as LLFA were consulted previously on this application and provided comments in our letter dated 31st March 2022. We have been reconsulted following receipt of updated information.

The County Council has reviewed the following revised documents relating to the above application:

Director of Universal Services
Patrick Blogg

- Flood Risk Assessment 1140 Rev 4.0 CGV Transport Consultants Ltd 21 July 2025
- Drainage Strategy 1140 Rev 2.0 CGV Transport Consultants Ltd 24 July 2025
- Following review of the above document HCC as LLFA has the following comments:

The above documents contain minor revisions since they were last reviewed by the LLFA in 2022.

The above flood risk assessment includes updated flood risk mapping following publication of the EA NaFRA2 data earlier this year. Although the areas of identified surface water flood risk has changed, and the assessment within the FRA has been updated, the conclusion of the report remains unchanged. We note the 1 in 100 year medium risk surface water flood map has been considered. Review of the EA surface water flood maps indicates large areas of the site that are subject to low risk of surface water flooding. This flood risk does not appear to have been satisfactorily taken into account and should be considered when determining the site layout. Surface water attenuation features should be located outside of identified areas of flood risk. In the event of a surface water flood the proposed attenuation basin would be inundated and the proposed drainage system would not operate as designed. We raised this concern in our last response and this concern remains outstanding. Please refer to our letter dated 31 March 2022 for further detail.

Following review of the existing greenfield runoff calculation and the proposed post development causeway flow hydraulic calculations the LLFA concludes that the proposed discharge rate for the site is not acceptable. The greenfield runoff calculation uses the site area of 2.48ha where the hydraulic calculations uses an estimated total impermeable area of 1.189ha. As the areas used in the calculations differs, the pre and post development discharge rates are not comparable and therefore the applicant has not demonstrated that the discharge rate from the site would not be increased as a result of the development. The LLFA would like to make clear that the drainage design is not in accordance with best practice or the National Standard for SuDS referenced in paragraph 7.2.7 of the above drainage strategy report in that only runoff from impermeable areas has been considered in the hydraulic calculations. We encourage a catchment based approach to drainage design in which all areas that are likely to contribute to the flow in the drainage network are considered. Runoff from permeable areas including gardens, shared green spaces and SuDS features should not be ignored.

There are discrepancies between the drainage layout and the hydraulic calculations. We consider the hydraulic calculations are not representative of the current design.

An allowance for climate change has not been applied to the 1 in 30 year event in the simulation settings within the hydraulic calculations.

We note the allowance for urban creep has been reduced from 10% (as previously proposed) to 5%. Justification is required for this change in value.

The simulation results indicate flooding resulting from the 1 in 100 year design event. It is not clear whether this flood volume can be managed within the site without risk of flood to property or whether the attenuation basin has been adequately sized. We raised this concern in our last response and this concern remains outstanding. Please refer to our letter dated 31 March 2022 for further detail.

Our previous response raised no objection to this application subject to conditions. Our position remains unchanged, however given changes to the EA flood risk mapping, changes to standards, our previous concerns which remain outstanding and the inappropriate drainage design calculations provided, we would like to update our recommendation. We advise that, if the application is granted, the site layout and scale should not be fixed at this stage until further assessment on the surface water flood risk and surface water drainage design has been concluded. We also advise that, if the application is granted, the submitted flood risk assessment and drainage strategy reports should not be considered as approved documents and a detailed drainage strategy for the site will be required at reserved matters stage. We consider a change to the proposed development scale and or layout may be required to resolve our concerns.

We believe a viable drainage strategy is available for this site but there are a number of concerns and uncertainties. We believe these can be addressed by condition but recommend that the submitted flood risk assessment and drainage strategy documents are not considered as approved documents and the following conditions are applied to this application:

1. No development shall begin until a detailed surface water drainage scheme for the site, has been submitted and approved in writing by the Local Planning Authority. The submitted details should include:
 - a. A technical summary of the surface water drainage design.
 - b. Detailed drainage layout plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations. Catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths and gradients should be included.
 - c. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change. Detailed hydraulic calculations

for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage network including the discharge location. 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 an allowance for climate change) rainfall events. The drainage features should have the same reference as the submitted drainage layout.

- d. Evidence that 10 % urban creep allowance has been included within the calculations.
 - e. Confirmation on how impacts of high groundwater will be managed in the design of the proposed drainage system to ensure that storage capacity is not lost, and structural integrity is maintained.
 - f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
 - g. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.
2. The condition of the existing watercourse/balancing pond/sewer, which will take surface water from the development site, should be investigated before any connection is made. If necessary, improvement to its condition as reparation, remediation, restitution and replacement should be undertaken. Evidence of this, including photographs should be submitted. If necessary, evidence that the asset owner has agreed to the discharge rate and connection should be submitted before any connection is made.
 3. Details for the long term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include;
 - a. Maintenance schedules for each drainage feature type and ownership
 - b. Details of protection measures

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>