

Comments raised	CGV Response
Page 2 <i>“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, the assessment within the FRA has not. We note the 1 in 100 year map has been shown. Review of the EA surface water flood maps indicates areas of the site that are subject to low risk of surface water flooding. This flood risk does not appear to have been taken into account and should be considered when determining the site layout.”</i>	This is not the case as the comment raised regarding locating surface water attenuation features is in our opinion not applicable for this site. The potential risk for surface water ponding/ flooding occurs within the ditches and the area where the existing attenuation pond has been constructed. The potential for surface water flooding is created from runoff from the site (over the fields) to be developed. It is not a surface water channel/ path from another site. See paragraphs 4.1.3 and 4.1.4. If the site is developed any runoff surface water would be captured by the new surface water drainage system and the surface water flood risk will be reduced. The existing ditches would be part of a regular maintenance regime and the would be at less risk of flooding.
Page 2 <i>“We previously commented on the existing pond outside the site boundary. Please refer to our previous response for further detail. The drainage layout plan in the above drainage strategy document still indicates the outfall into the existing pond. Further information has not been provided on this pond and our concerns remain.”</i> <i>“Hydraulic calculations do not consider the possible effect of flood locking as a results of a submerged outfall. There does not appear to be space in the current proposed site layout to accommodate larger surface water storage features if required.”</i>	Hayling Island Builders Ltd have the right to connect to this existing attenuation pond or extend as necessary and ensure the pond is maintained. A copy of the land Transfer dated 8th January 2016 can be provided under separate cover. The management company appointed by the original developer are currently maintaining the pond and the outfall and have an obligation to maintain it for the lifetime of the development. The ditch on the southern boundary remains in the ownership of Hayling Island Builders Ltd. The impact of a submerged outfall has been checked (See Appendix G) and if the pond remained submerged for 24 hours there would still be no flooding. The peak water level would rise in the 1 in 100 year plus climate change event storm from 5.043m to 5.158m. The minimum crest level of the pond is 5.5m. At the detailed design stage further improvements can be included by introducing other storage and Suds measures throughout the layout. In addition, we have indicated a high-level overflow to the ditch, or the LLFA insists a direct connection can be made to the ditch.
Page 2 <i>“We previously commented on the proposals to pipe or divert the existing</i>	We are applying for pre-planning advice under separate cover, but this information is not included in this report or the

<i>watercourse. We strongly recommend early engagement with the LLFA through our ordinary watercourse consent pre application service, details can be found below. Both proposed options to alter the existing watercourse do not appear to be acceptable based on initial review. The existing connections into the watercourse identified by the topographic survey have not been considered.”</i>	application. The watercourse is already culverted in many locations and extending these pipes will not be a detriment to the free flow of the ditch.
Page 2 <i>“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 1.1ha where the hydraulic calculations uses an estimated total impermeable area of 0.189ha. 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.”</i>	You use the greenfield (pre-development) runoff rate for the whole area that currently contributes runoff to the receiving system (i.e. the whole site or contributing catchment), not just the impermeable/developable portion — then control post-development runoff from the developable/impermeable area so that the discharge from the site does not exceed that greenfield rate. “Greenfield runoff” describes the pre-development (undeveloped/vegetated) behaviour of the whole site or contributing catchment, so the benchmark/target discharge is normally based on that full pre-development area. Designers must therefore show that post-development flows (from the new impermeable areas) are attenuated so the site does not increase peak flow to the receiving watercourse. Which has been done here. This is standard practice. It should also be noted that we have allowed for a CV value of 1 which is allows for 100% run off and gives a conservative result.
Page2/3 <i>“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 3 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.”</i>	The runoff from the gardens is very unlikely to now find its way to the system as there will be properties, roads, driveways and parking areas in the way, but we have allowed for a CV value of 1.0 in our calculations. In addition, as the final outfall is into a Southern Water sewer so they will not allow groundwater into their drainage network. The site is relatively flat and there will be some infiltration into the ground. The impact on rainfall falling direct onto the pond has now been included and there is still no flooding in any storm event. See results in Appendix G.

Page 3 <i>“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.”</i>	Realistically 10% urban creep is never going to be achieved as the site is fully developed, and the density is relatively high (35%). There is little or no scope to provide additional parking in any of the units as the scheme as shown provide only small front gardens. 9 of the units will be social housing and 4 will be apartments so these units will not expand. The average property drawn for this scheme is shown as 60m², if you remove the apartments and social housing and say all 20 units could have extensions in the future and an average of 12m² per property. A sensitivity test has been carried out using 10% urban creep, and no flooding occurs in any storm event.
Points raised in the conditions that should be included in any update	
Page 3-point a. <i>“A technical summary of the surface water drainage design.”</i>	Agreed this would help and could be written in such a way that all interested parties could understand it and has been included in section 7.
Page 3-point b. <i>“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.”</i>	The level of information for an outline planning application supported by a comprehensive drainage strategy report has been included in the report. These comments appear to be a generic response if no formal comprehensive report was issued. Except for a catchment plan all details have been included within the report and plans.
Page 3-point c. <i>“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 4 level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage</i>	These have been provided in the report, and the cross references have been checked for latest version of the report.

<i>features should have the same reference as the submitted drainage layout.”</i>	
Page 4-point d. <i>Evidence that 10 % urban creep allowance has been included within the calculations.</i>	Although not appropriate for this size of site it has been shown that this can be accommodated within the network.
Page 4-point e. <i>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.</i>	From information supplied for a nearby development at Furniss Way undertaken by Hayling Island Builders the average depth to groundwater was found to be 1.5m below ground level. The pond and any attenuation tanks will be lined to ensure no impact from groundwater.
Page 4-point f. <i>Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.</i>	Clearly shown within the report.
Page 4-point g. <i>Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.</i>	Flood exceedance has been shown for the development, and a swale has been provided for exceedance flows.
<i>It is strongly recommended that this information is reviewed before Land Drainage consent application is made.</i>	We are in the process of applying for pre-planning advice, but it does not form part of this application and won't be covered in this report. There is no planning reason to do so as the works will relate to physical measures, not design issues.
Page 4-Condition 2 <i>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.</i>	We note that that Southern Water have recently been consulted (22 nd September 2025) and they will be responded in 21 days about the application. They cannot object on capacity terms but recommend that reinforcement is carried out. If the condition of the sewers is poor it is the Water Authorities responsibility to make good their sewers. As a due diligence exercise a developer would carry out this exercise.
Page 4 Condition 3 <i>“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;”</i>	This is a condition that should be included along with a condition that ensures that a drainage verification report is carried out.