Hampshire County Council

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Date	27 October 2025	*Email*	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Erection of 90 dwellings with associated landscaping, parking and improved access. at Proposed Development site (former Electricity Board site), Bartons Road, Havant.(Application No. APP/25/00639

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

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

- Flood Risk Assessment and Drainage Strategy incl. appendix A-I 24-097-002 Rev A Charles and Associates 30.07.2025

Following review of the above document HCC as LLFA has the following comments:

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The above report describes areas of Surface Water Flood Risk within the site as identified in the EA Surface Water Flood Risk maps. A clear surface water flood flow route and areas of potential flood water storage are identified. The above report assessed this risk as very low. The LLFA do not agree with this assessment. If flood risk areas (from any source) are identified, it must be demonstrated that the proposals including drainage attenuation features can be delivered without encroaching on these areas. If the flood risk areas are deemed inaccurate, modelling will be required before changes can be accepted. If development is proposed in these areas without modelling, compensation areas will be required and details on how the topography will be altered to ensure new development is not at risk. Modelling may also be required to support this. Loss of flood storage volume and obstruction of flood flow routes should be avoided. A plan overlaying flood risk mapping with the proposed development plans should be produced to aid assessment of risk.

It is encouraging to see the above report 1.2.1 refer to the newly published National Standards for SuDS. HCC LLFA do not currently require proposed developments to fully comply with the new standards but we do encourage adoption of these standards. Following review of the submitted information we consider that the proposed drainage strategy does not comply with the standards.

Site infiltration testing appears to indicate that there may be some limited potential for infiltration to ground. Best practice guidance states that opportunities for infiltration should be maximised in favour of lower priority discharge destinations. There may be an opportunity for partial infiltration to reduce the surface water discharge to the public sewer.

The site is within the Havant East catchment priority area as defined in the Hampshire County Council Lavant Catchment Management Plan.

We advise that the submitted drainage strategy has not been prepared in accordance with best practice. The proposed drainage design only considers the runoff contribution from impermeable areas and ignores runoff from permeable areas that would be intercepted by the proposed drainage network. The LLFA recommend a catchment based approach to drainage design taking into consideration contribution of runoff from both permeable and impermeable areas. Recently published National Standards for Sustainable Drainage Systems (SuDS): standard 3 (3.32) also supports this approach.

It is not clear how the proposed access road is to be drained. It is not clear how some of the permeable paved parking areas are connected to the network.

We understand an upgrade may be required to the existing sewer but given the lack of capacity in the sewer network the effect of surcharge outfall should be considered. The available storage in the network appears to be well

designed but particularly at the downstream end there is no available capacity during the 1:100 design storm to provide a buffer if the outfall is surcharged.

Approval for proposed surface water connection and discharge rate is required. The LLFA require written confirmation of approval of the proposed connection and surface water discharge into the public sewer before we are able to provide a recommendation to the LPA. Approval from Southern Water is required to demonstrate the proposed outfall is secured and therefore feasibility of the overall drainage strategy. Southern Water correspondence states that there is currently insufficient capacity in the sewer network to accommodate the proposed surface water discharge of 6.1l/s. We note the proposed discharge rate has subsequently been increased to greenfield rate of 7.2l/s.

Further detail will be required regarding the maintenance of the surface water drainage system. This requirement can be covered by condition if the application is granted.

We require this further information before we can make a decision on whether to recommend to the Local Planning Authority that planning permission is granted.

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/changewatercourse

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/changewatercourse