



Hampshire County Council

Economy, Transport and Environment Department
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Direct Line	01962 846730	Your reference	APP/19/00324
Date	18 October 2019	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Re: Response 2 - Demolition of existing dwelling and business units and construction of a 2/3 storey building to provide 19 flats and 2 commercial units with vehicle and bicycle parking and a bin store. at 5-7 Station Road, Hayling Island

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.

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:

- 414406-100P1 Drainage General Arrangement (Cowan Consultancy Aug. 2019)
- PLAN-027833, Southern Water Planning Consultation Response (08/05/2019)
- Drainage Assessment Report [letter] (Cowan Consultancy, No date provided)
- Document A – Existing Site Runoff (Job No: 405000, No date or revision provided)
- Document B – Proposed Site Runoff (Job No: 405000, No date or revision provided)

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

In order for us to provide a substantive response, the following information is still required:

- **Background information** on the proposed design. Including proposal; site; plans of surface water drainage and any SuDS featured in the scheme.
 - Please provide a drawing clearly showing proposed permeable paving extents. There are several existing manhole covers on site within the proposed building footprint. Please clarify whether they will remain or be decommissioned. Provide a drawing showing clearly impermeable areas draining into the proposed drainage system.
- Evidence that the applicant understands the **sensitivity of discharge points** relating to the receiving water body. Where this is main river or discharging through contaminated land the LPA may have to consult the Environment Agency (EA)
- Evidence of and information on the **existing drainage network** for previously developed (brownfield) sites
- Evidence that the **proposed drainage will follow the same pattern as the existing**. This avoids directing flow to other locations.
- Identification of and information on areas that may have been affected by **failures in the existing drainage regime**
- Information evidencing that the **correct level of water treatment exists** in the system in accordance with the Ciria SuDS Manual C753
- **Where infiltration is used for drainage**, evidence that a **suitable number of infiltration tests** have been completed. These need to be across the whole site; within different geologies and to a similar depth to the proposed infiltration devices. Tests must be completed according to the BRE 365 method or another recognised method including British Standard BS 5930: 2015
- **If not using infiltration for drainage** - Existing and proposed **run-off rate calculations** completed according to a suitable method such as IH124 or FEH. Information is available from UK Sustainable Drainage: Guidance and Tools. Calculations must show that the proposed run off rates do not exceed the existing run-off rates. This must be shown for a one in one year event plus climate change and a one in one hundred year event plus climate change.
 - If not using infiltration provide justification on why infiltration is not being used.

- **If not using infiltration for drainage** - Existing and proposed **run-off volume calculations** completed according to a suitable method such as IH124 or FEH. Calculations must show that, where reasonably practical, runoff volume should not exceed the greenfield runoff volume for the same event. This must be shown for a 1 in 100 year, 6 hour rainfall event
- **Maintenance regimes** of the entire surface water drainage system including individual SuDS features, including a plan illustrating the organisation responsible for each element. **Evidence** that those responsible/adopting bodies are in discussion with the developer. For larger/phased sites, we need to see evidence of measures taken to protect and ensure continued operation of drainage features during construction.
- **Calculations/Hydraulic model output** to demonstrate the surface water drainage system is capable of draining the site without flooding during the 1 in 30 year storm whilst retaining the 1 in 100 year storm flows plus climate change allowance within the site boundary and without putting the proposed buildings and any third party land at risk from flooding.
 - The calculations provided have included a 40% climate change factor for the 1:100 year existing runoff, this is not acceptable. Only the post-development scenario should include the 40% climate change factor.
 - The calculations assume a 50% runoff coefficient for the permeable paving. Please provide suitable justification or utilise 100% runoff coefficient.
 - The calculations submitted indicate that runoff has been calculated using BRE 365 methodology. BRE 365 methodology only applies when discharging to a soakaway and is not valid for discharge to a sewer. Please provide a suitable set of calculation/hydraulic model output for the existing and proposed drainage scenarios.
- Evidence that **enough storage/attenuation** has been provided without increasing the runoff rate or volume. This must be shown for a 1 in 100 year plus climate change event.
- Exceedance flows are considered in the event of the pipe being non-operational. 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.
- Evidence that **Urban Creep** has been considered in the application and that a **10% increase** in impermeable area has been used in calculations to account for this.
- Surface Water RWP connections need to go to an intermediate chamber before discharging to a combined sewer. Consider the use of non-return valves to prevent backflow from the combined sewer (surface water +

foul water) into the surface water system during combined sewer surcharges.

We would highly recommend you utilise the application checklist available at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning> to ensure the correct information is provided.

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.

This is our **second response** to this consultation. If the above listed material is not supplied in full, a third response will be issued recommending that planning permission be refused on the grounds of insufficient information.

Please ensure all further information is sent to us via the relevant Local Planning Authority.

For guidance on providing the correct information, we recommend you use our **Surface Water Management Pre-application service** which provides clear guidance on what is required for us to recommend that planning permission is granted and consider the works as best practise. 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 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
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Hampshire County Council, 1st Floor, Ell Court West,
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Web: <http://www3.hants.gov.uk/flooding/watercourses.htm>

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 <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.

***A Pre-application service for Ordinary Watercourse Consents** is available, allowing consents to go through in a smoother, often more timely manor. For full information please visit:*

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/WatercoursePreApplication>