



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2022/0052
Direct Line		Your reference	APP/21/01434
Date	13 January 2026	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Outline application for development of up to 300 dwellings (including affordable housing). The proposal includes provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage system (SuDS); a new vehicular access from St Mary's Road; and associated ancillary works. All matters reserved except for means of vehicular access. Accompanied by an Environmental Statement. at Rook Farm, land off St Marys Road, Hayling Island (Application No. APP/21/01434)

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 1st February 2022. We have been reconsulted following receipt of updated information.

Director of Universal Services
Patrick Blogg

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

- Flood Risk Assessment & Drainage Strategy SHF.1132.142.HY.R.001D enzygo June 2025

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

The above document is included as appendix 10.4 within the updated environmental statement. We reviewed revision B of the same document prior to our last consultation response in which we raised no objection providing that planning conditions were applied to any granted application. The above revised document (revision D) has been revisited to align with updated flood data, policy and legislation.

We note only minor changes to the identified areas subject to surface water flood risk. Our advice therefore remains unchanged with regard to flood risk and we recommend a sequential approach when planning the site layout to ensure all development is located outside of identified areas of flood risk from any source.

A revised drainage layout plan has been provided in the submitted drawings in the above document. Minor revisions have been made. We note the level of the proposed ponds have been lowered, in the case of the Northern Basin the pond appears to be shown below existing ground level. We note the strategy now includes surface water pumps, to enable discharge from the attenuation basins into the existing watercourses. Pumped drainage systems are typically agreed by exception only and are not considered to be in accordance with the SuDS approach to drainage design. As the design for this development is progressed, the feasibility of a gravity surface water drainage discharge should be re-assessed. Pumped systems should not be agreed unless it can be demonstrated that no other options are feasible and additional evidence may be required to demonstrate that flood risk will be appropriately managed. Notwithstanding the above we accept the additional flood risk typically associated with pump failure would be limited in this case due to the proximity to the discharge points.

New hydraulic calculations have been provided in appendix 8 of the revised FRA and drainage strategy. 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 7.53ha where the hydraulic calculations uses an estimated total drained area of 4.27ha (2.13ha North, 2.14ha South). 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 point out that the from the description in section 6.6, it appears the outline drainage strategy design calculations are not in accordance with best practice that only runoff contributions 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. Based on the information that has been submitted, it is possible that the required attenuation volume may have been underestimated. It is also possible (depending on the network catchment areas) that the maximum allowable discharge rate from the proposed drainage networks may be less than the calculated greenfield runoff Q_{bar} from the site that has been used in the calculations. As the approach taken is not in accordance with current standards, the LLFA recommend that the outline drainage strategy including the surface water drainage layout and the hydraulic calculations should not be considered as approved, and would not be accepted if progressed in the same way at detailed design stage.

A CCTV survey has been included in appendix 7 of the above document. We understand the purpose of this survey was to investigate the connectivity of the ditch network downstream of the site. The survey does not include a plan and so is inadequate to demonstrate downstream connectivity of the existing surface water drainage system. This information is critical to determine the viability of the proposed drainage outfalls and will be required if the proposed development is to be progressed. We also note defects have been identified in the surveyed pipes which will require remediation. We have previously suggested a condition to cover the requirement for this information.

Given that we previously raised no objection to this application and the revisions to the submitted information are relatively minor our position remains unchanged. Some of the minor changes to the submitted drainage drawings and calculations raise new concerns and if this was a new application the LLFA would be asking for more information to provide confidence in the surface water drainage strategy.

We 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 would like to propose some minor changes to the conditions that we previously suggested as shown below.

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 drawings at an identified scale indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths and gradients.
 - c. Detailed hydraulic calculations demonstrating existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change. The hydraulic calculations should take into account the connectivity of the entire drainage network including the discharge location. The hydraulic model report should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical simulation results by maximum level for 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 references as the submitted drainage layout.
 - d. 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.
 - 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. No development shall begin until the connectivity and condition of the existing on-site land drains and downstream culverted connections into the public sewer network, which will take surface water from the development site, has been investigated and evidence provided to demonstrate suitability of the proposed discharge locations. If necessary, improvement to its condition as reparation, remediation, restitution and replacement should be undertaken. Evidence of this, including photographs should be submitted. Evidence that the asset owner has agreed to the proposed discharge rates and connections 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 maintenance schedules for each drainage feature type and ownership.

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>