



Hampshire County Council

Universal Services
The Castle
Winchester, Hampshire SO23 8UD

Tel: 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

Enquiries to	Scott Glover	My reference	SWM/2025/0033
Direct Line		Your reference	APP/24/01010
Date	14 April 2026	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Proposed employment development, with associated access, parking, yards and landscaping. at Interbridges Site, New Brighton Road, Emsworth (Application No. APP/24/01010)

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 letters dated 10th February 2025, 17th April 2025 and 23rd June 2025. We have been reconsulted following receipt of additional information.

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

Director of Universal Services
Patrick Blogg

- Letter to LLFA – MT/6096 Bellamy Roberts 19th February 2026
- Fluvial Hydraulic Model Report AEG8623_PO10 Issue 1 aegaea 06.02.26

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

The above Fluvial Hydraulic Model Report has been submitted to provide detailed assessment of the existing fluvial flood risk to the site and effectively challenges the accuracy of the Environment Agency fluvial flood risk maps. The LLFA are unable to review the report or to comment on its conclusions. The Environment Agency should be consulted in this regard. If the EA accept the conclusions of the hydraulic modelling report, and agree the reduced flood extent this would resolve our previous comments regarding fluvial flood risk.

Please reconsult us when the EA have provided comment.

We previously requested further groundwater monitoring data. Further data has been provided in the above report and further readings have been reported direct to the LLFA indicating that the peak level for the monitoring location had been recorded in the submitted data. We advised that the location of monitoring boreholes should be carefully considered to ensure representative groundwater levels across the site could be understood. The additional groundwater data has been collected from two monitoring locations. The results indicate that groundwater levels peak close to the ground surface towards the Eastern extent of the site. During previous groundwater monitoring, groundwater levels in the Southeast corner of the site were observed at shallower depth than the rest of the site. Based on all the data collected it must be assumed that groundwater could rise to surface level in the South East corner of the site where Yard B is to be proposed. We therefore consider use of permeable paving in Yard B is inappropriate, even if lined due to potential for ingress of high groundwater into the paving.

We previously commented on the proposed discharge location. As previously advised, the proposed drainage strategy is not in accordance with the SuDS design philosophy in that the proposed discharge does not mimic the natural drainage of the site and the proposed discharge location is into a different drainage catchment. The site currently drains to the East. A gravity drainage system discharging to the same location as the site currently drains is preferred and pumped systems into different catchments are agreed by exception only. We note Southern Water have confirmed sufficient capacity in the receiving public sewer to convey the proposed site discharge, although they also require that the hierarchy of preferred drainage discharge options is followed. On further review of the Southern Water sewer records it appears the receiving sewer network may outfall directly into the tidal estuary, although from the records we hold this is not confirmed. If this is the case, as there is capacity in the public sewer, it can be assumed that the proposed discharge would not increase downstream flood risk in the receiving catchment. If a

direct surface water sewer outfall to the estuary can be confirmed, although the proposed discharge location would not be in accordance with the hierarchy and therefore not our preferred option, the LLFA would not object to the application based on the proposed discharge location.

Pumped drainage systems are associated with increased risk of exceedance flood due to possibility of pump failure. Based on the exceedance flow route plans it appears exceedance flood flow routes would be to the Southeast corner of the site. The onward flow route is not clear but the description provided in previous communications from the applicant suggests flows would continue into Seagull Lane. Current overland flow routes would be maintained. The effect of land development and constructing impermeable surfaces could increase exceedance flood risk.

The LLFA are unable to provide final comment on the suitability of the surface water drainage strategy for the site until the Environment Agency have reviewed and provided comment on the fluvial hydraulic model report. Until a review has been undertaken by the EA, please consider our previous comments regarding fluvial flood risk as current.

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/c
hangewatercourse](https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/c
hangewatercourse)