

Appendix C Stakeholder Correspondence



Solent & South Downs Area

Pre-application Advice Note

September 2019

This document sets out the environmental issues we will consider when providing our planning application consultation advice to Local Councils. It can be used by applicants, developers and consultants at the pre-planning stage.

Fluvial Flood Risk

Development must be safe and should not increase the risk of flooding.

You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk>

If your proposed development is located within flood zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG)

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Here you can determine whether the flood risk vulnerability of your proposed development and the flood zone are compatible. You can also establish if there are flood risk sequential test and exception test requirements for your proposed development. In the first instance we recommend the developer/applicant liaises with the Local Planning Authority (LPA) to undertake the Sequential Test in accordance with the National Planning Policy Framework (NPPF).

If your proposed development is located within flood zone 2 or 3 and its vulnerability and flood zone are considered acceptable under the NPPG then a site specific Flood Risk Assessment (FRA) is required to support any subsequent planning application. This is required by paragraph 163 of the NPPF: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Guidance on the content of a site specific FRA can be found in the NPPG and online: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

More detailed flood risk modelling data is available to help you produce a FRA please contact our Customers and Engagement team at SSDenquiries@environment-agency.gov.uk.

Climate Change Allowances

On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances in a site-specific FRA: <https://www.gov.uk/guidance/flood-risk-assessments-climatechange-allowances>

Groundwater Quality

Development must not cause pollution to the water environment.

Source Protection Zones

We have defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used across the country for public drinking water supply. These zones are more sensitive to contamination from activities that might cause pollution in the area. The closer the activity, the greater the risk.



SPZ1s are the areas designated as most at risk from contamination and development activities and in these areas we may consider it inappropriate for development to discharge foul or surface water into the ground.

To see if your proposed development is located within a Source Protection Zone, please use our online map: <https://magic.defra.gov.uk/>

Contaminated Land

The NPPF takes a precautionary approach to land contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of remediation. Where contamination is known or suspected, a desk study, site investigation, remediation and other works may be required to enable safe development.

Pollution

If the proposed development use has the potential to pollute ground or surface water receptors then an assessment to establish whether the risk of pollution is acceptable or can be mitigated will be required within any planning application.

Foul Drainage

When drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This should be done in consultation with the sewerage company of the area prior to the submission of a formal planning application.

If connection to a public sewage treatment plant is not feasible, a package sewage treatment plant may be considered. If you would like further advice please call 03708 506 506.

Cemeteries

The development of new cemeteries in areas where groundwater vulnerability is high should be avoided, except where the thickness and nature of the unsaturated zone, or the impermeable formations beneath the site, protect groundwater; or where the long-term risk is mitigated by appropriate engineering methods.

Main Rivers

Ecology

In accordance with the National Planning Policy Framework (NPPF), any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it. Opportunities to incorporate biodiversity in and around the development will be encouraged.

Your scheme should be designed with a naturalised buffer zone of at least 8 metres from the main river to protect and enhance the conservation value of the watercourse and ensure access for flood defence maintenance.

This buffer zone should be managed for the benefit of biodiversity for example by the planting of locally appropriate, UK native species. The buffer zone should be undisturbed by development with no fencing, footpaths or other structures. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.

To identify any Main Rivers in proximity to your proposed development please see our Main Rivers Consultation Map: <http://apps.environment-agency.gov.uk/wiyby/151293.aspx>

customer service line
03708 506 506

www.gov.uk/environment-agency

incident hotline
0800 80 70 60

floodline
0345 988 1188

Culverting

The Environment Agency is likely to oppose culverting as it is damaging to the ecological integrity of the river channel and its corridor and acts as a barrier to the movement of wildlife, including fish and may also increase flood risk. If the proposal will impact an existing culvert the Environment Agency may oppose planning consent for development either over, or within 8 metres of an existing culvert. Wherever possible, existing culverts should be removed and the river channel and bankside habitat reinstated to restore the ecological continuity of the river channel and its corridor.

Water Framework Directive (WFD)

Any marine works below MHWS require an assessment of possible impacts on Water Framework Directive (WFD). The assessment should include all elements of the works that fall within, or have the potential to affect, a WFD water body and any of the protected areas therein (including Bathing Waters and Shellfish Waters).

The WFD assessment should follow the 'Clearing the Waters for All' guidance available at <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>

Where appropriate, a WFD Assessment should assess any potential impacts and demonstrate that the required enhancements will be delivered. In some cases the requirements of a WFD assessment can be incorporated into an Environmental Impact Assessment (EIA). Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

Permits & Consents

Environmental Permitting Regulations

To see if your proposed development requires an Environmental Permit under the Environmental Permitting Regulations please refer to our website: <https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>

From 6 April 2016 an Environmental Permit is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated Main River, and within 16 metres of a tidal defence.

Ordinary Watercourse Consent

The prior written consent of the relevant Lead Local Flood Authority is required for the erection of any flow control structures, culverting or diversion of ordinary watercourses, including streams, land drains and ditches.

Marine Licence

A marine licence may be required for any activities at the mean high water spring tide up to the territorial limit. This also includes the waters of every estuary, river or channel where the tide flows at mean high water spring tide.

Any development must demonstrate how adverse impacts on migratory fish, bathing waters, shellfish waters, designated sites, protected and priority species and habitats will be avoided, minimised, mitigated and if necessary compensated for. Works within or affecting a Water Framework Directive (WFD) waterbody will need to demonstrate that compliance with WFD objectives will be achieved. 'Clearing the Waters for All' provides guidance on how the impacts on WFD should be addressed, and should be used when preparing an assessment, including the screening and scoping of activities. <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>

Further pre-application options

The information provided above details generic information which may or may not be applicable to your development. We are able to provide more detailed and bespoke advice and answer technical questions for a charged fee of £100 per person per hour +VAT.

If you are interested in finding out more about this service, please email:

planningssd@environment-agency.gov.uk

We can explain this service and provide you with a bespoke quote for further pre-application advice that you may require please see .gov - <https://www.gov.uk/government/publications/pre-planning-application-enquiry-form-preliminary-opinion>

Please note

Please note that the view expressed in this letter by the Environment Agency is in response to the enquiry only and does not represent our final view in relation to any future planning application made in relation to this site.

We reserve the right to change our position in relation to any such application.

As part of this preliminary response we have not technically reviewed any documents. This opinion is based on the information submitted and current planning policy and guidance.

If you have any questions please contact the Solent & South Downs Sustainable Places team:

planningssd@environment-agency.gov.uk

To make a request for data

Please submit your request for data to ssdenquiries@environment-agency.gov.uk. You should get the information within 20 working days. We will tell you when to expect the information if we need more time.

There are many datasets available online at www.data.gov.uk including flood maps, historic landfill, waste exemptions, consented discharges to controlled waters, and much more.

customer service line
03708 506 506

www.gov.uk/environment-agency

incident hotline
0800 80 70 60

floodline
0345 988 1188



Hampshire
County Council

Universal Services
The Castle
Winchester, Hampshire SO23 8UD

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

Enquiries to	Thomas Callaway	My reference	SWM-PRE/2022/0676
Direct Line	03707 798982	Your reference	
Date	17 January 2023	Email	swm.consultee@hants.gov.uk

Dear Mr Burgess,

**Proposed development/FRA at Southleigh Road Southleigh Road,
HAVANT, HAMPSHIRE PO9 2PE(Application No.**

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above pre-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>

Assessment of Flooding

The site is mostly within Flood Zone 1, generally meaning a low risk of flooding from rivers and tidal influences, however there are areas of the southern part of the site within Flood Zones 2 and 3. The site is generally at very low risk of flooding from surface water, however a flow route exists which has areas at low, medium and high risk through the site. Development should be sited outside of areas at an elevated risk of flooding in accordance with the National Planning Policy Framework. Existing surface water flow routes should be maintained to reduce the risk of flooding both on and off site.

Surface Water Management

Director of Universal Services
Patrick Blogg

The ground is predominantly clay which is likely to indicate low permeability at the application site, and infiltration testing should be undertaken to determine whether an infiltration drainage strategy is viable. Groundwater monitoring should be undertaken in the winter months to show that any proposed infiltration features will be at least one metre above the highest groundwater levels. Drainage systems should be designed for the 1 in 100 year storm event plus a peak rainfall allowance, and half drain times should be assessed.

Should infiltration be unviable as a strategy, attenuation of runoff with a restricted discharge to a watercourse or surface water sewer may be acceptable. An assessment of greenfield runoff rates should be made for the existing site, and any proposed discharges off site should be restricted to Qbar or should not exceed the equivalent greenfield rates for storms up to the 1 in 100 year event plus a climate change allowance for peak rainfall.

Urban creep, flood exceedance flow routes and allowable flooded extents should be provided for all drainage strategies, along with maintenance information.

SuDS Design and Selection of Drainage Features

SuDS should be provided to include an element of biodiversity and amenity as well as managing water quality and quantity. Quantity should be assessed through hydraulic calculations for the relevant modelled storm events. Network calculations should be provided as appropriate to determine whether flooding occurs at manholes in piped parts of the system. Water treatment should be assessed through the simple index approach.

Surface Water Checklist

Please refer to the Surface Water Checklist for the information required by the LLFA for different types of planning application:

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Callaway', with a stylized flourish at the end.

Thomas Callaway
Senior FWM Project Officer



Mr D Burgess
Stantec
10 Queen Square
Bristol
BS1 4NT

*Economy, Transport and Environment Department
Elizabeth II Court West, The Castle
Winchester, Hampshire SO23 8UD*

Tel: 0300 555 1375 (General Enquiries)
0300 555 1388 (Roads and Transport)
0300 555 1389 (Planning)
Textphone 0300 555 1390
Fax 01962 847055
www.hants.gov.uk

Enquiries to Flood & Water Management

My reference HFI-2023-0004

Direct line 01962 846730

Your reference

Date 17/01/2023

E-mail fwm@hants.gov.uk

Dear Mr Burgess,

Re: Historic Flood information request for Southleigh Road, Havant

We refer to your request for historic flood information on 19/12/2022.

Thank you for your application for historic flood information for this site. Please find below the information we have on our systems that we believe to be relevant for this request. Kindly note the declaration on the final page with regards to this information.

Historic flooding information

We have reviewed our records of flood incidents for this area and have seven records of flooding within a 250m radius of the site. This does not necessarily mean that other flood events have not occurred, they either may not have been reported or events may have occurred prior to 2012 – Hampshire County Council as Lead Local Flood Authority have only been maintaining flood records since then following the establishment of the Flood and Water Management Act 2010. The Environment Agency (EA) may hold data on flood events prior to this date.

Reference	Source	Date	Flood Source	Details
331-13021	HCC Highways	2011-12	Fluvial	Lack of capacity in EA culvert
712-13044	HCC Highways	2013	-	Flooding in bellmouths on both sides of A30, capacity issue
784-13045	HCC Highways	2014	Groundwater	High water table

785-13046	HCC Highways	2014	Pluvial	Surface water outfall in poor condition, insufficient capacity
787-13048	HCC Highways	2014	Groundwater	High water table
21574068	HCC FWM	2/8/21	-	-
21637495	HCC FWM	4/1/23	-	Washington Road footpath

Please refer to attached map for the location of this flood event(s). Kindly note that outlines of areas highlighted as highway flooding on the map may include properties or other off-highway areas that were not impacted by flooding.

There have been no flood reports undertaken for this area under Section 19 of the Flood and Water Management Act where significant flooding was reported.

Flood risk from surface water

The EA's Updated Flood Map for Surface Water illustrates the potential area of surface water flooding taking into account the topography and permeability of the area. It also includes factors to take into account drainage provision. This information is designed to be high level and should not be used to indicate specific properties and risk but identify low points and potential flow routing. The mapping indicates that this address is generally at very low risk of flooding from surface water, however a significant flow route of low to high risk passes through the site. High risk means that each year this area has a chance of flooding of greater than 3.3%, and some parts of the site may flood to a depth of 1.2m.

For more information on this flood risk, please see <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

HCC has prepared Surface Water Management Plans which are available on our website. For more detailed information on flooding in the Havant Borough Council administrative area, please see their Strategic Flood Risk Assessment, which can be found at <https://www.push.gov.uk/wp-content/uploads/2018/05/Havant.pdf>.

Flood risk from watercourses

Watercourses are any natural or artificial channel above or below ground through which water flows. Watercourses are classified as either 'Ordinary Watercourse' or 'Main River'. Ordinary watercourses are watercourses that are not part of a Main River and include streams, ditches, drains, culverts etc. through which water flows. The Lead Local Flood Authority (LLFA - in this instance Hampshire County Council) are responsible for managing the risk from ordinary watercourses and have powers to ensure maintenance is undertaken by the relevant body, usually the adjacent landowner. For more information, see <http://documents.hants.gov.uk/flood-water-management/HCCFloodRiskManagement-Landowners.pdf>.

Main Rivers are typically larger streams and rivers, but some are smaller watercourses of local significance. Main Rivers are nationally managed by the Environment Agency, but responsibility for maintenance remains with the landowner.

There are two Main Rivers within 250m of this site. Known Ordinary watercourses are marked on the attached map(s); however it should be noted that many ordinary watercourses are not recorded centrally (such as small ditches etc.). The site is located within the water body catchment of the River Lavant.

For more information regarding fluvial (river) and tidal flooding and flood risk please contact the Environment Agency or refer to the following website: <https://flood-map-for-planning.service.gov.uk/>

Ordinary Watercourse Consenting

Hampshire County Council is responsible for issuing Ordinary Watercourse Consents. These consents assess the flood risk of proposed changes (both permanent and temporary) to ordinary watercourses and are a legal requirement of such work. We have one record of Ordinary Watercourse Consents (OWCs) within the search area.

Please refer to the Hampshire County Council OWC website for further information and the forms for consents:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/change-watercourse>

The consenting process has a statutory timeframe of two months from when the application is validated. To request data relating to consents prior to 2012 please contact the EA on: psohiow@environment-agency.gov.uk

Any works proposed within eight metres of a main river are likely to require a flood risk permit from the Environment Agency. Please refer to the following for further information: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

Flood risk from sewers

For information regarding foul flooding, please contact Southern Water.

Vulnerability of site from groundwater

Groundwater is by definition hard to predict and difficult to manage. The geology of the site in question is primarily London Clay Formation clay, silt and sand.

Hampshire County Council hold two records of groundwater flooding in the area, however this does not necessarily mean that other flood events have not occurred. It can be difficult to define flooding as a result of groundwater particularly in those areas where silt, gravel and sand can lead to a perched watertable which can prevent

infiltration drainage from working as opposed to being a groundwater emergence flood event which tends to be seen linked to chalk aquifers.

Please note this information should only be used to establish relative, but not absolute, risk of groundwater flooding. A more detailed assessment including groundwater monitoring may be required.

More detailed information is available in relation to potential groundwater flood risk from the British Geological Society however it should be noted that this is a chargeable service. For further information please refer to:

<https://www.bgs.ac.uk/research/groundwater/datainfo/GFSD.html>

Hampshire County Council has a draft Groundwater Management Plan that is available on our website which contains useful information. It can be found at:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/strategies/groundwater-management-plan>

Environmentally designated sites

We note that the site is within 250m of designated environmental sites:

- Southleigh Forest (South) SINC

Drainage Assets

We do not hold information in relation to private or third party drainage assets but are aware that Hampshire County Council as Highways Authority are responsible for many assets within and draining the Highway.

It is the responsibility of Hampshire Highways to maintain their assets on the highway, and they are on a regular cleansing schedule. If there are any issues with any highway gullies, soakaways, culverts etc. from a maintenance perspective, this can be flagged on the online system:

<https://www.hants.gov.uk/transport/roadmaintenance/roadproblems>

If flooding issues are reported to Highways and are in relation to Highway infrastructure, we as LLFA may not have access to these records and you may need to place a request for this information using the above link.

If you have any further queries, please contact the Flood and Water Management (FWM) Team quoting the above reference

Kind regards

FWM Team
fwm@hants.gov.uk

Please Note: The data supplied has been compiled from a variety of sources of varying reliability. The data is constantly being revised and validated to ensure the highest accuracy possible. However, the data should not be relied upon or considered completely accurate and the data is provided on the understanding that neither the County Council nor the disclosing officer is to be held responsible should you rely on this data and consequently suffer damage.

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.

Hampshire County Council defines significant flooding as 'flooding that affects 20 or more properties internally in one flood event within the same location OR flooding that affects significant lengths of highways affecting 20 or more properties and lasts for a period of 3 hours from the onset of flooding'. For more information on how we define flooding, please see our guidance on our website <http://documents.hants.gov.uk/flood-water-management/FloodInvestigationsguidance.pdf>

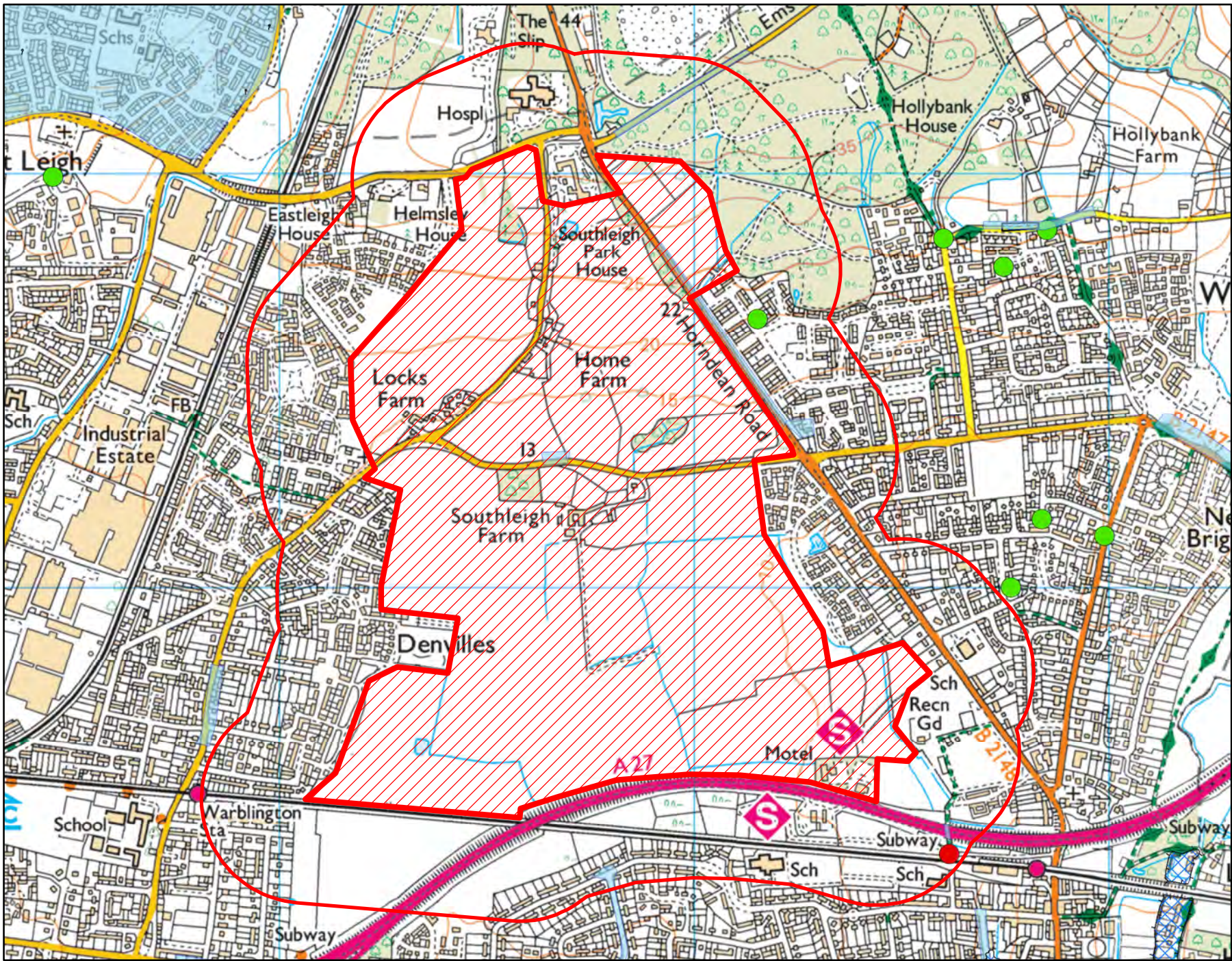
You may find the following websites useful –

- <http://bluepages.org.uk/>
- <https://nationalfloodforum.org.uk>
- <https://nationalfloodforum.org.uk/about-flooding/reducing-your-risk/protecting-your-property/>
- http://hummedia.manchester.ac.uk/institutes/mui/cure/research/documents/Property_owners_booklet_web_000.pdf (linked from the National Flood Forum)
- <https://www.floodre.co.uk/>

Users' Disclaimer

I understand that in using advice provided by the Hampshire Flood and Water Management Team I am aware of the following:

1. The Flood and Water Management (FWM) Team is part of Hampshire County Council ("We/Us/Our"). The Council holds copyright of this information and advice on behalf of the FWM team except where service level agreements state otherwise. No direct reproduction of this advice will be allowed as a direct copy, except for the purpose of Environment Information Requests.
2. Advice provided by the Hampshire FWM Team will only be used for the purpose stated and will not be stored beyond the life of the project for which it was acquired.
3. Any personal information supplied in association with these records will not be used, copied, or passed to any third party without the consent of the Hampshire FWM Team and in accordance with the GDPR.
4. Whilst every reasonable effort is made to validate information supplied to and by the Hampshire FWM Team owing to the dynamic and judgmental nature of information relating to flooding, the Hampshire disclaims any responsibility for the accuracy or comprehensiveness of the information supplied, and accepts no liability for any indirect, consequential, or incidental damages or losses arising from use of the information.
5. I am aware of the Hampshire FWM Team charging schedule and understand I may be charged for the advice.
6. All web links are accurate as on the day they were accessed.



Legend

-  Site
-  250m Buffer
-  EA Recorded Flood Outlines
-  Recorded Highway Flooding in Hampshire
-  Surface Water Flooding
- Hampshire Flood Enquiries**
- enq_status_name**
-  Enquiry Raised
-  Resolved Flood Enquiry
-  Historic Flood Map

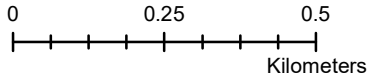
Historic Flood Information Request

Historic Flooding Records

Stantec

Southleigh Road, Havant

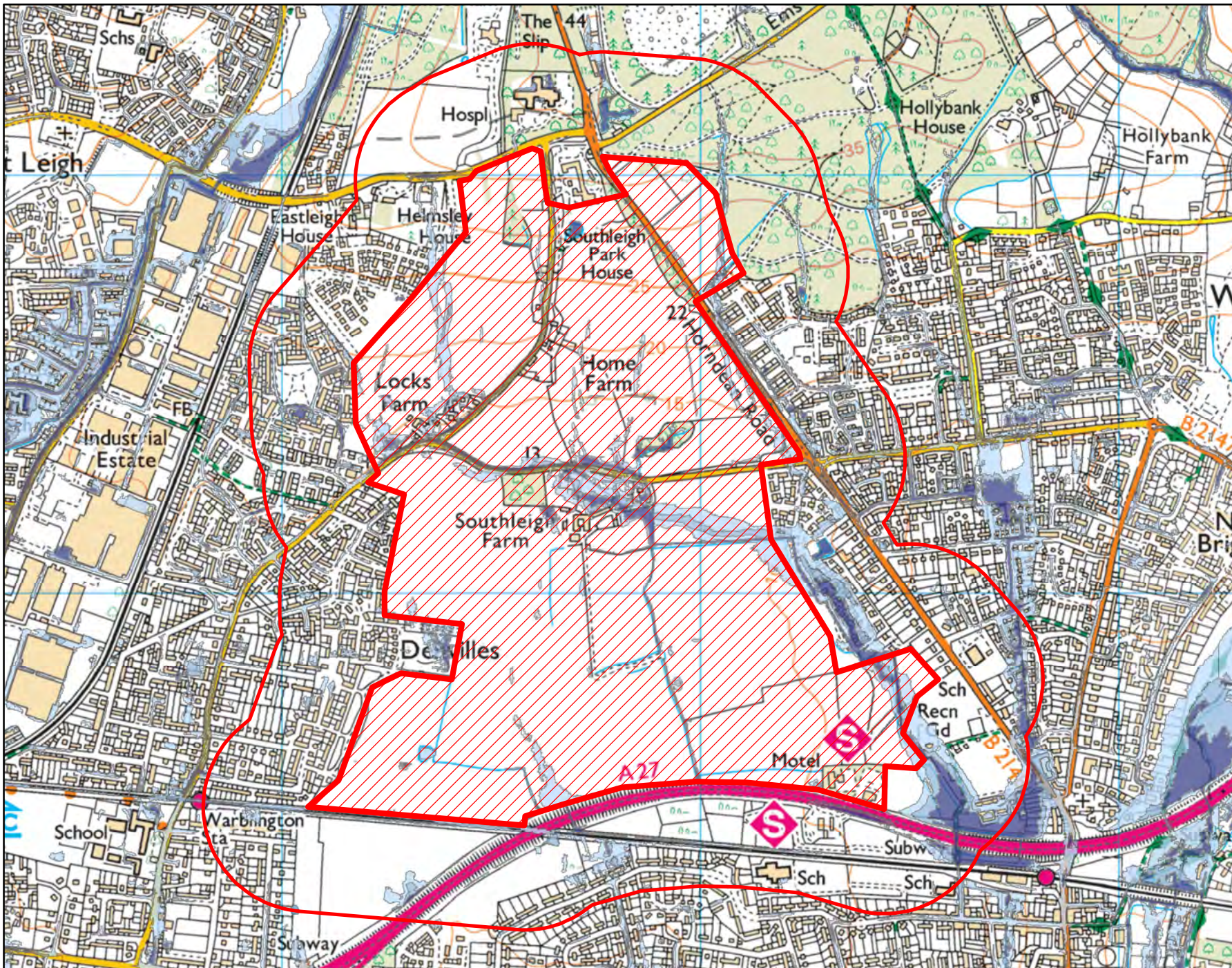
Notes:



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Legend

-  Site
-  250m Buffer
-  Flood Maps for Surface Water (High)
-  Flood Maps for Surface Water (Medium)
-  Flood Maps for Surface Water (Low)

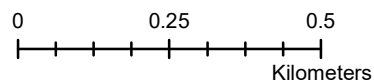
Historic Flood Information Request

Flood Map for Surface Water

Stantec

Southleigh Road, Havant

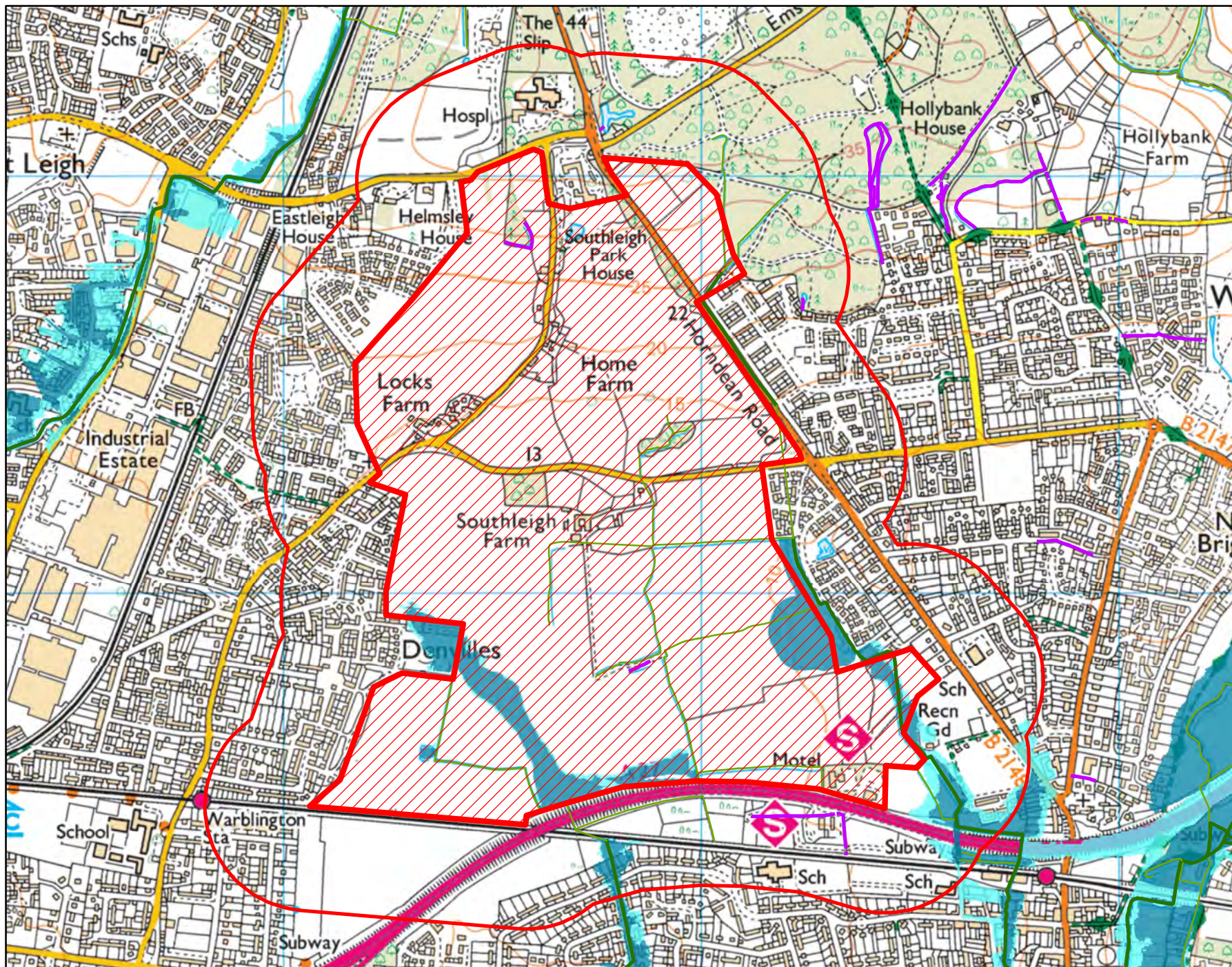
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Legend

-  Site
-  250m Buffer
-  non main river
- mainriv**
-  FRM Indicative Main River
-  Detailed River Network - Offline Drainage
-  Flood Zone 3
-  Flood Zone 2

Historic Flood Information Request

EA Flood Zones and Detailed River Network

Stantec

Southleigh Road, Havant

Notes:

0 0.25 0.5
Kilometers

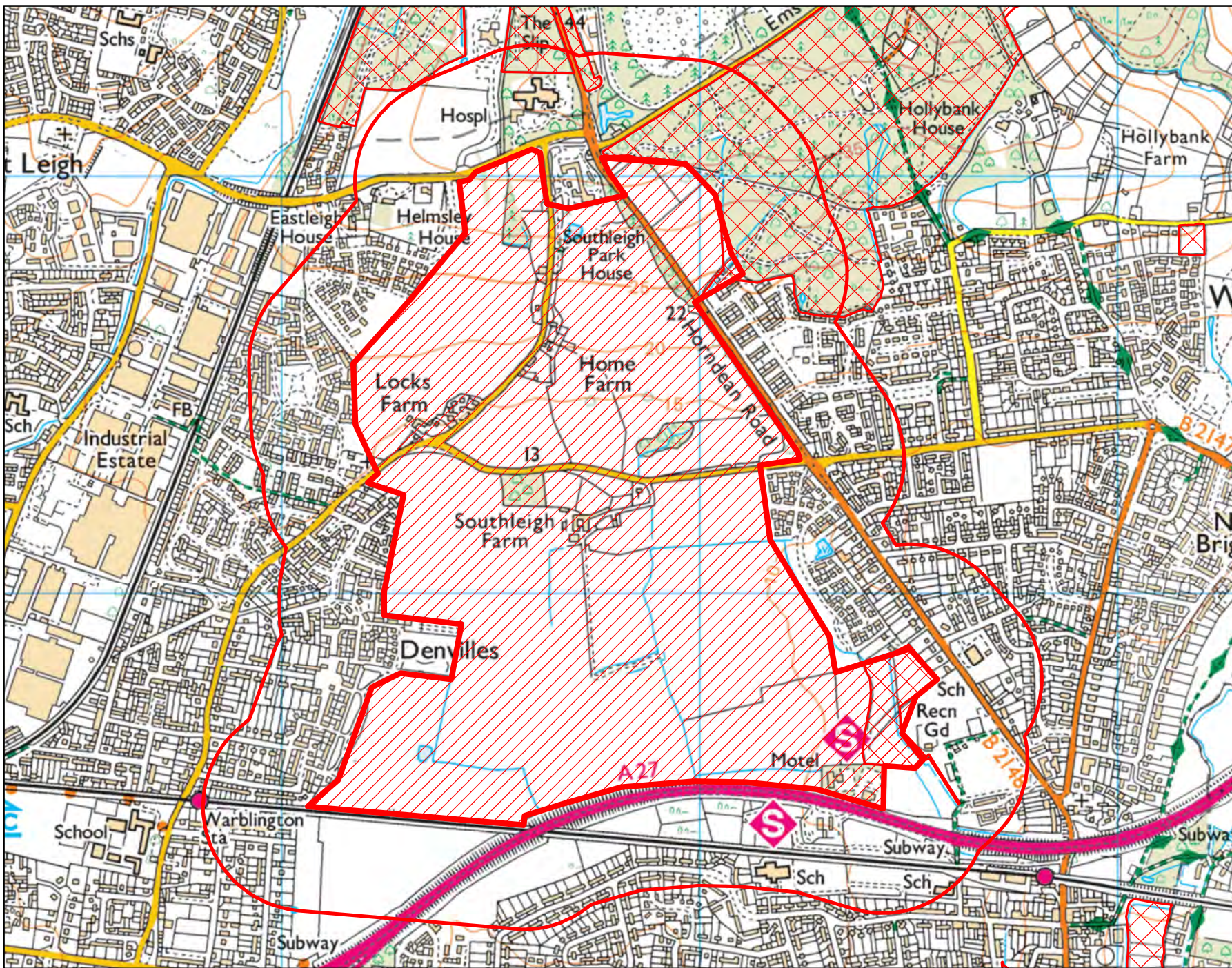
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Hampshire
County Council



Legend

- Site
- 250m Buffer
- SINC

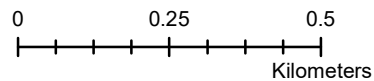
Historic Flood Information Request

Environmental Designations

Stantec

Southleigh Road, Havant

Notes:



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