

E-mail (Aug 9th 2023) to and responses (Aug 30th 2023) from Hampshire County Council (as Lead Local Flood Authority) following their response to the Addendum to the Drainage Report for the Land to the east of New Inn Road ("the Haywain site").

Dear Sirs

I am writing to you on behalf of Copythorne Parish Council in connection with the above planning application and in particular with regards to the attached document (* **see 1 at end**) submitted by the HCC Flood and Water Management Team to the NFNPA on June 30th 2023.

Copythorne Parish Council is a consultee to the planning application and as members of the HCC Flood and Water Management Team will be aware the Parish Council takes an active interest in matters relating to flooding in the Parish and in particular to issues affecting the village of Bartley.

A number of properties in the village have suffered historically from surface water flooding with many receiving grants from the Environment Agency in respect of future mitigation strategies. Indeed, we have only recently been supporting the Environment Agency with a Flood Resilience campaign as part of which a number of Bartley residents have signed up for property surveys paid for by the EA. These may lead to mitigation works again paid for by the EA

In compiling your response to the "Addendum to Drainage Report dated June 9th 2023" (***see 2 at end**) supplied to you by the applicant we are interested in your responses to the following questions:-

- Q. Has the HCC F&WMT undertaken a site visit to see for themselves the proposed watercourse deemed acceptable as a suitable method of dealing with surface water drainage post the development of what is currently undeveloped land to confirm that it has the capacity to cope with the expected levels of surface water without impacting on residents of existing properties in the local area (Oakfield Road, Chinham Road, etc.).
A. **Given the number of planning applications we receive across the entire County, it is not possible for us to undertake site visits nor is there any requirement to do so.**

- Q. Has proof that the applicant has consent to utilise the proposed watercourse (some of is on land outside of their ownership) been supplied to the HCC F&WMT?
A. **The applicant has been in discussions with the relevant landowner however there is no requirement for 3rd party agreement to be complete at this stage in the process. Permission would need to be granted before works were undertaken but this sits outside the planning remit.**

- Q. Is the HCC F&WMT content that the existing pipework that the watercourse will join under Chinham Road is of a sufficient capacity to cope with the level of water expected without impacting on existing properties in Chinham Road that have suffered historically from surface water flooding?
A. **The applicant has demonstrated that the runoff leaving their site is no greater than that of a greenfield situation and thereby would not be increasing downstream flows. The proposed discharge rate is 1l/s (equivalent to 2 l/s/ha) for all storm events up to the 1:100 + climate change and when compared to the pre-development discharge rates of 5.9l/s/ha Qbar rate (equating to the 1:2 year storm, 13.4 l/s/ha for the 1:30 storm and 18.8 l/s/ha for the 1:100 storm this shows a substantial betterment over the existing situation. Although we can't confirm the capacity of the existing downstream drainage systems, the fact that they are proposing betterment on the existing situation with water being discharged in the same ditch as pre-development, this is considered in accordance with national policy and guidance and therefore not something we can object to.**

Q. If the method of dealing with surface water drainage which you consider acceptable should prove to be inadequate and flooding of properties occur who would be liable in respect of the inadequacies of the system.

A. **The drainage engineer undertaking the drainage design is responsible for the accuracy of the information they have provided and if found to be inaccurate would be responsible.**

Q. Will you be following all of the relevant Priority Area Policies contained within the "Test (Lower) Catchment Management Plan" in particular (but not limited to):-

Policy 2:- "Implement a more stringent approval process for all Ordinary Watercourse Consent applications. Each application will be considered on a site-by-site basis where further information and additional requirements may be requested by Hampshire County Council to ensure there will be no increase in flood risk. Where relevant, during the Ordinary Watercourse Consenting process, other organisations and internal teams will be consulted e.g., Natural England, the Environment Agency, the County Council's Biodiversity teams and Structures teams etc."

A. **Consent has not yet been submitted but this policy will be applied in line with our approved processes.**

Policy 5:- "Ensure that the Local Planning Authority only approve new developments that sufficiently demonstrate that a rigorous maintenance regime will be implemented for their surface water management systems. Developers will be expected to provide maintenance plans setting out maintenance schedules and maintenance responsibilities in line with the latest technical guidance. If adoption is proposed an agreement in principle should also be provided."

A. **This will be addressed via a planning condition**

Policy 6:- "Ensure that the Local Planning Authority requests verification reports from developers when construction is completed. These reports should contain as built plans and photographs of surface water drainage assets in situ to demonstrate correct construction has taken place. LPAs should also periodically review the construction of surface water management systems on new development to ensure it continues to adhere to best practice and industry standards."

A. **The guidance associated with these are not yet published and given the date that the application was submitted, it was deemed unreasonable to retrospectively apply this**

Policy 7:- "Make it best practice that a 50% betterment of surface water run-off rates is demonstrated for the surface water management features of any proposed development. This will ensure that developers take on the responsibility to ensure that their new developments do not flood on areas of previously developed land. Also, large areas of impermeable surfaces within new developments will be broken up improving infiltration, increasing biodiversity, and adding to provision of blue/green infrastructure, along with all the multiple benefits this offers."

A. **This is only applicable to previously developed (brownfield) sites so will not be relevant in this situation however there is a substantial reduction in runoff levels of 50% which would mean that they have complied with this policy regardless.**

Policy 11:- “Liaise with the Local Planning Authorities to limit permitted development rights regarding the paving or covering of permeable surfaces with impermeable surfacing. The use of alternative permeable measures such as gravel, grasscrete, permeable paving, etc to form driveways will be encouraged as these measures will fall under permitted development rights. However, those proposing impermeable driveways in Priority Areas will require planning permission. This will help limit the effect of urban creep.”

- A. We are liaising with all LPAs to limit permitted development rights however the adoption of this policy will be at the discretion of the individual LPAs. This also sits outside the planning approvals processes.**

I look forward to receiving your response in good time to support the Parish Council's consideration of a response to the amended plans at its meeting on September 12th 2023.

Regards

David Rigby

Clerk and R.F.O.

Copythorne Parish Council

(* 1 – LLFA response d/d June 30th 2023 to Addendum to Drainage Report d/d June 9th 2023)

(* 2 – Addendum to Drainage Report d/d June 9th 2023)

Both of the above documents have also been added to the Parish Council website on the Affordable Housing Current page and are available - with other documents - on the NFNPA Planning Portal, see link [planning application - 22/00498](#)