Hampshire County Council

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Direct Line	0370 779 8301	*Your reference*	HCC/2021/0787 – EA112
Date	7 February 2022	*Email*	SWM.consultee@hants.gov.uk

Dear Sir/Madam,

Proposed extraction of sand and gravel, with restoration to grazing land and recreation using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane. At Hamble Airfield.

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:

- Flood Risk Assessment; Report Reference: 66650R2; dated: November 2021.
- 8.0 WATER ENVIRONMENT AND FLOOD RISK; dated: December 2021.

Operational phases:

The information submitted by the applicant in support of this planning application indicates that surface water runoff from the processing plant area and undeveloped northern part of the site will be managed through a freshwater lagoon and silt lagoon, which will infiltrate surface water to ground.

Additionally, surface water runoff from each operational phase will be managed through the active quarry void, allowing settlement to occur before infiltrating to ground.

The applicant is proposing to manage surface water through infiltration, however, there is no information within the planning website which demonstrates that infiltration is feasible at the application site and an infiltration rate of 1.0 m/hr has been assumed for the calculations, which something that we would not support without site specific testing.

The British Geological Survey (BGS) data indicates that the application site is underlain by Bracklesham Group and Barton Group (sand, silt and clay) and sand and gravel superficial deposits, which could indicate variable permeability across the site.

Therefore, at this stage we request infiltration testing in accordance with the BRE365 (2016 publication) methodology at a depth and location commensurate with the proposed infiltration features. Considering the site characteristics and proposals in question, the infiltration testing should be carried out within several trial pits at the proposed lagoons location and depth(s), and for each phase location and depth.

The information submitted by the applicant also indicates that: ''*Infiltration via the base of the void is assumed to be zero in this instance given that the water table will be exposed in the base of the void (note that the base of the feature has been set at the maximum expected groundwater water elevation)*''. Additionally, Figure 8.6 shows groundwater levels really close to ground.

Discharging surface water runoff directly into the water table is not something that we would support as the hydraulic capacity and structural integrity of the infiltration features will be compromised.

Therefore, and based on the groundwater monitoring included within 8.0 Water Environment and Flood Risk (Figures 8.5, 8.6, 8.7, 8.15 & 8.16), at this stage we request a groundwater assessment which demonstrate that there will be at least 1m unsaturated zone between the base of any infiltration feature, and the highest groundwater level recorded including seasonal variations. Additionally, The EA must be consulted on surface water directly discharged into the water table.

The application site is within the extent of the Environment Agency (EA) Groundwater Vulnerability Zones. Therefore, and based on the implications with infiltrating surface water from the operational phases, the EA should be consulted regarding any potential contamination associated with infiltration.

We request that the above issues are addressed at this stage and not through planning conditions. This is to demonstrate that the application site has a secure outfall to dispose surface water and to demonstrate that the quantum

of development is achievable, whilst ensuring that flood risk will not be increased on or off site.

We would also highlight that the Flood Risk Assessment identifies current runoff to be directed to the borders of the site and reference is made to minor surface watercourses. Please clarify where these are in relation to the site as this can indicate that infiltration is not viable.

Restored site:

The information submitted by the applicant in support of this planning application indicates that surface water runoff from the restore site will be managed through to two new pond features within the site boundary. Additionally, and given the expected low permeability of the fill material, flow control devices will allow discharge from the ponds to linear infiltration trenches (around 2 m deep by 1 m wide, lined with a permeable membrane and filled with gravel) along the boundary of the site. Reference is made to evapotranspiration which we do not feel is appropriate to consider as a discharge option.

Additionally, an infiltration basin will be positioned in the northwest of the site, outside of the fill area, to attenuate and discharge runoff from this part of the site to ground.

Considering that the geology conditions will change with the infilling material, the applicant should undertake a detailed ground investigation / hydrogeology assessment report of the filling material. This should demonstrate that:

The existing discharge rates and volumes leaving the site will not be increased at a result of the new ground conditions.
The filling material will not change / block groundwater movement through the site, increasing groundwater flood risk into adjacent sites.

In addition, given that the site will be progressively developed, the restoration plan needs to give more consideration as to how the partially restored site will function as it is not clear how surface water will be managed when some storage features may not be in place.

The current plans indicate potential for the catchment areas to be adjusted so further evidence is required to ensure no additional flows are directed to alternative locations.

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.

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
Economy, Transport & Environment Department,
Hampshire County Council, 1st Floor, EII Court West,
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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/changewatercourse