

## APPENDIX G: LLFA Meeting Report

Site Reference:	SWM-PRE/2025/0739	
Review Date:	18/12/2025	
Reviewer:	SR	
Authorised:	SR	
Total No. Pages		5

#### Proposal Description:

Expansion of IRC - new accommodation and facilities buildings, Energy Centre, [REDACTED] Garden, [REDACTED] carpark, recreational space and landscaping.

#### Site Background

Pre-development status	Part greenfield & brownfield		
Modelled Flood Risk	Historic Flooding - split by data owner		
Fluvial Flood Zone 2	Y	Highways	N
Fluvial Flood Zone 3	Y	LLFA	N
Surface Water High	Y	Environment Agency	N
Surface Water Medium	Y	Watercourses	
Surface Water Low	Y	Main River	N
Groundwater risk zone	N	Ordinary Watercourse	N
Priority Area	N	Predominant Geology	Selsey Sand Formation

Name of Documents Reviewed	Document reference No.
Proposed Development Site Plan P2	323319-15207-ATR-000-GF-DR-A-0250-S4-D0100 S4

#### Summary of submission, key points requiring assessment, response to specific developer queries

The proposals are to construct secured residential buildings and car parking on the site which is thought to be largely greenfield. It is proposed to utilise filter drains, permeable paving, swale and an interceptor with flows pumped into existing outfall at restricted discharge. Some cellular storage is proposed off line to manage any additional storage requirements.

It is noted that the site is affected by coastal flooding and it was clarified that the east portion of the site is protected through coastal defences but there is flood risk arising from the north. This has been modelled and discussions are underway with the Environment Agency. While we do not comment on coastal matters, it will be necessary to ensure that the surface water drainage will continue to function during a coastal event and that exceedance routes are managed appropriately. It was also highlighted that a sequential approach to the site layout is usually expected with dwellings placed outside of areas of flood risk. This does not appear to be the case for this site but again, it is expected that the Environment Agency will comment on this.

The connection point is believed to be a Southern Water sewer. While this can be accepted as a connection point, further information will be required to demonstrate acceptance of the connection and allowable flow rate.

The site will be assessed on the requirements in the new national standards and the narrative below has been provided to confirm the information that would be required.

For further information please refer to our website: <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

## Review of Proposals

The following sections review the information provided in line with our guidance and checklist and provide commentary as to the suitability of the information if it was submitted for planning. If no relevant information is provided then guidance is included on what should be submitted for planning. Any key issues identified are highlighted for further discussion however this is based solely on the information submitted

Required information: Existing Site Conditions		Commentary
Topographic survey plan		<p>Site levels.</p> <p>Existing drainage features (including outside of the boundary particularly in relation to connecting watercourses adjoining the site).</p>
Flood risk assessment/statement <a href="#">(Planning Practice Guidance)</a>		<p>Extents of flood risk areas and flow routes (considering all sources of flooding) including those from offsite locations. <b>Majority of coastal section, including car park, at risk of coastal of flooding</b></p> <p>Assessment of the flood risk vulnerability of the proposed development and its suitability in relation to the flood risk at the site. Development must be steered to areas of lowest risk and a sequential approach taken in relation to layout. There should be no impediment to flow paths and areas at risk of flooding (from all sources) must be avoided.</p>
Evidence for built development in flood risk areas	N/A	<p>Site specific modelling may be required to demonstrate more accurate extent of flood risk if development considered in areas shown at risk from national modelling., e.g. updated flood risk modelling results using an appropriate methodology. Refer to the flood modelling technical note.</p> <p>Appropriate mitigation, e.g. flood compensation areas (see technical note).</p>
Assessment of existing drainage systems  (National Standards for SuDS 3.39.2)	N/A	<p>Locations, dimensions, and condition assessments of existing drainage features.</p> <p>Extents of existing drainage catchments including a downstream assessment of the discharge point to confirm continuity beyond the site. <b>Not applicable. Discharge point to the sea.</b></p> <p>Standing water levels in watercourses (risk of submerged outfalls). Modelling the drainage system with a submerged outfall may be required where frequently submerged outfalls are likely e.g. tidal, groundwater flooding prone watercourses etc. For Main Rivers, the Environment Agency may be able to advise on peak levels. <b>An assessment of submerged outfall as a result of high tide needs to be considered.</b></p>
Assessment of pre-development runoff rates and volumes  (National Standards for SuDS 3.26, 3.31)		<p>Greenfield runoff rates and volumes for the following storm events:</p> <ul style="list-style-type: none"> <li>• 1 in 100 years (1% AEP)</li> <li>• 1 in 30 years (3.3% AEP)</li> <li>• 1 in 2 years (approximately Qbar)</li> <li>• 1 in 1 year (100% AEP)</li> </ul> <p>Discharge volumes should be calculated using the 1 in 100 6-hour storm (National Standards for SuDS 3.19).</p> <p>An appropriate statistical method should be used</p> <p><b>The site will be discharged to the sea and can have an uncontrolled outfall however an understanding of pre/ post runoff rates should still be provided. Given that it is proposed to connect to an existing asset, an understanding of the allowable discharge rate will be required.</b></p>
Site investigation report  (National Standards for SuDS 1.15,1.17, 3.11, 3.14, 3.39.2, 4.16.1)	N/A	<p>Borehole logs showing geology.</p> <p>Results of sufficient infiltration testing (three successive tests) at the depth and location of any proposed infiltration features in accordance with BRE365. The lowest rate achieved at each test location must be used for the drainage design.</p>

		<p>Results of groundwater monitoring undertaken at suitable locations and depths across the site to demonstrate a suitable unsaturated zone. Monitoring must be undertaken to capture the likely peak groundwater level and timings will vary depending on the geology i.e. chalk sites are expected to have peak levels between January and May, river terrace deposits are likely to have peak levels between November and February. Please see infiltration testing and groundwater monitoring technical note for additional details.</p> <p>Site investigation is unlikely to be required given discharge is proposed to the sea</p>
<p><b>Detailed Drainage Strategy Required information:</b></p>		<p><b>Where layout is fixed</b> <b>To include:</b></p>
<p>Detailed drainage strategy/ Technical Note</p>		<p>A detailed written surface water drainage strategy, following the drainage heirarchy, with references to drawings and calculations that is compliant with policy, demonstrating that the site can be suitably drained without increasing the risk of flooding.</p> <p>In addition to the above, reserved matters applications should provide a technical note summarizing what was agreed at outline, any overarching phasing plans, and how this application fits with the wider site drainage.</p>
<p>Detailed drainage layout plan</p>		<p>A detailed surface water drainage layout showing a full drainage network of sufficient capacity, in appropriate locations with due regard to flood risk areas, overland flow routes and connectivity to discharge locations taking into account final site levels.</p> <p>A plan showing flooded extents and depths managed effectively within the site, where they exist for the 1 in 100-year storm event.</p> <p>Easements or access provision must be provided to retain access to SuDS features and watercourses for maintenance with sufficient information provided to demonstrate maintenance can be undertaken appropriately. Designs must consider access requirements for maintenance machinery (e.g. basin slopes). <b>Include who is responsible for any defences in relation to coastal risk</b></p> <p>Culverting of watercourses must be restricted to where access is required <u>only</u>, and consent sought from the relevant authority. <b>It is not believed that there will be any impacts on watercourses as a result of the works.</b></p> <p><u>Please review our consenting guidance at <a href="http://www.hants.gov.uk/changewatercourse">www.hants.gov.uk/changewatercourse</a> for more information. Please note, consent is a separate process from planning, and the granting of a planning application does not guarantee that ordinary watercourse consent will be granted.</u></p>
<p>Detailed hydraulic calculations</p> <p>(National Standards for SuDS 3.3 - 3.9, 3.32-3.37).</p>	<p>N/A</p>	<p>Detailed hydraulic calculations produced using industry-standard software , the most up-to-date rainfall data, demonstrating sufficient capacity in the drainage network and that post-development runoff rates and volumes (where appropriate) do not exceed pre-development runoff rates and volumes (where appropriate) will be managed in accordance with the minimum requirements of the national standards. Simulation results should be presented for the following storm events:</p> <ul style="list-style-type: none"> <li>• 1 in 100 years (1% AEP)</li> <li>• 1 in 30 years (3.3% AEP)</li> <li>• 1 in 2 years (approximately Qbar)</li> <li>• 1 in 1 year (100% AEP)</li> </ul> <p>Appropriate climate change allowances for peak rainfall intensity must be applied to the 1 in 30 year and 1 in 100-year storm events. Peak rainfall allowances must be applied in accordance with the location of the site and the design life of the development. <b>It is noted that free discharge is permitted into the sea and discharge rates will be restricted depending on the asset owner requirements of the discharge point</b></p> <p>Appropriate allowances for urban creep must be applied to all impermeable areas within residential curtilages (excluding flats and apartments). <b>Urban creep is not required for this site.</b></p> <p>The drainage network should be sized to contain all contributing permeable and impermeable areas.</p>

		Any flooding anticipated for the 1 in 100 storm event plus a peak rainfall climate change allowance must be demonstrated to be safely managed within the site. Flooding of buildings, utility plants, or safe access and escape routes will not be accepted.
Interception  (National Standards for SuDS-Standard 2)	N/A  N/A	Provide a plan with interception features, associated contributing areas, and design parameters. Include calculations proving interception storage for the full impermeable area and any contributing permeable areas. Interception must be able to store 5mm rainfall. Hand calculations are usually sufficient; complex sites may use modelling. <b>Given that the entire site is being drained to the sea further information will not be required.</b>  See the rainfall interception technical note for more information.
Agreement in principle for asset connection  (National Standards for SuDS 1.20,1.28)		If draining to a third-party asset (e.g. adopted sewer), obtain agreement in principle from the asset owner and submit this with the application. A capacity check will identify the maximum discharge rate however we will still require greenfield equivalent rates regardless of additional capacity being available within the sewer. <b>confirmation needed on any permissions required to connect to the sea. FRAP may be required but this will be separate from the planning process</b>
Water Quality  (National Standards for SuDS 4.1 – 4.8, 7.16)	N/A	An assessment of the pollution hazard of the development and proposed mitigation offered by the SuDS features using the methodology in the SuDS Manual C753 unless stated otherwise in local plans). SuDS treatment trains are expected as standard.  Evidence of manufacturer's technical specifications if proprietary treatment systems (items not listed in the simple index approach tables) are proposed.  Discharge to the foul sewer will only be accepted where justified by pollution risks. See pollution prevention for businesses.  Potential pollution/ water quality impacts during blockage, pump failures scenarios etc should also be identified.
Flood exceedance flow route plan  (National Standards for SuDS 3.6, 3.38 – 3.40, 7.3, 7.16).		A plan showing how exceedance flows will be managed appropriately through the site when the capacity is exceeded and mimic the pre-development situation. Blockage and pump failure risks should be considered and managed.  Details of how flow routes are prevented from entering buildings, such as road camber and kerbs, and finished floor levels of buildings.  Temporary flooding of roads or recreational areas etc should consider the risks during flooding and rehabilitation post flooding. Road flooding should be no greater than <b>low hazard</b> as per FD2320/TR2 and should not pose a risk to identified safe access and egress routes.
Existing flood routes through site  National Standards for SuDS 3.6, Principal 8		Offsite floodwater from events up to a 1-in-100-year probability, as indicated by the surface water flood map or LLFA data, must be safely routed through the site. This routing should avoid increasing flood risk or interfering with the site's drainage system and must be shown on a plan. If interaction with the proposed drainage system cannot be avoided, appropriate mitigation measures must be implemented. <b>There are no specific flow routes identified from the available information for the site. Consideration will need to be given to potential runoff from the surrounding areas and exceedance routing considered to ensure this can be managed within and around the site.</b>

<p>SuDS management and maintenance details</p> <p>(National Standards for SuDS 4.5.1 &amp; 4.10, 7.8)</p> <p>Standard 7</p>	<p>N/A</p> <p>N/A</p>	<p>A schedule of maintenance tasks, to include descriptions, frequencies, role of the drainage system, design life/replacement frequencies of components and the responsible parties for maintaining each part of the drainage system (including any adoption agreements) and any watercourses is required. This should identify features prone to blockage and actions to take if blockages or a pollution incident occurs. Rehabilitation requirements following a flood.</p> <p>A plan showing where different parties have responsibility for maintaining SuDS and watercourses, including easements. Colour coding by maintenance responsibilities is recommended. See the maintenance plan technical note.</p> <p>Details of how drainage features will be protected during the construction period, what silt management and rehabilitation would be required before site occupation</p> <p>A phasing management plan is required to address construction risks where drainage systems serve different parts of the site and are implemented at different times. The plan must also include remediation measures to ensure the drainage system meets its intended design condition before the development is occupied.</p> <p>Construction Risk Mitigation: Identify vulnerable drainage features and mitigation measures during construction. It should be clear how the drainage system will be protected during construction from risk that may affect the functioning of drainage system and refer to Construction Risk Technical Note for guidance.</p> <p>Construction Drainage Plan: Include an annotated drawing showing temporary drainage to be installed at the start of construction and any mitigation to protect the drainage during construction</p>
<p>Verification report in Catchment Priority Areas</p>	<p>N/A</p>	<p>A statement written by a suitably qualified person that confirms the adequacy and quality of the installed drainage system. Qualification to be listed.</p> <p>Survey evidence such as CCTV surveys of pipe networks and invert levels of control structures.</p> <p>Photographs in situ, as-built drawings, and hydraulic calculations for the installed drainage system. Design changes during construction must be shown not to impact drainage performance.</p> <p>A summary of any works affecting watercourses.</p> <p>GIS shapefile of the red line boundary with as-built drainage plans.</p>
<p>As built details (outside a Priority Area)</p>		<p>Provide via planning condition as-built drawings for the drainage system and a GIS shapefile of the red line boundary.</p>
<p>Amenity Statement</p> <p>(Standard 5- National Standards for SuDS)</p>	<p>N/A</p>	<p>Where public access is involved, SuDS should also offer amenity. Use LPA landscape guidance, landscape character assessments, green infrastructure strategies, design policies and design codes to inform design. See the amenity and biodiversity technical note for more information.</p> <p>Label amenity features on drainage drawings</p> <p>Explain the amenity provision via a SUDS section in the Design and Access Statement.</p> <p>If amenity isn't practical or required by LPA policy, state the reason.</p> <p><b>It is noted that the site is restricted and amenity is not required</b></p>

Biodiversity Statement.

(Standard 6- National Standards for SuDS)

SuDS should support biodiversity. SuDS should be a means for delivering already required biodiversity value. This is not an additional biodiversity requirement. See the amenity and biodiversity technical note for more information.

Label biodiversity supporting SUDS features on drainage plans.

Provide a section within the biodiversity statement demonstrating the suitability of the SUDS design for supporting biodiversity.

If not feasible (e.g. a biodiversity provision is not required by LPA policy or National Policy), justify in the biodiversity statement.





