

Hampshire County Council
The Castle
Winchester
Hampshire
SO23 8UE

Our ref: HA/2012/113623/01-L01
Your ref: HCC/2012/0373
Date: 13 December 2012

Dear Sir/Madam

DEVELOPMENT OF THE SITE TO PROVIDE AN END OF LIFE VEHICLE TREATMENT FACILITY AND METAL RECYCLING FACILITY, COMPRISING OF NEW BUILDINGS, HARDSTANDING, WEIGHBRIDGES, PERIMETER SCREENING AND FENCING, AN EXTENSION TO THE ROAD AND ASSOCIATED ROAD IMPROVEMENTS, A FOOTPATH AND A NEW CAR PARK FOR STAFF AND PUBLIC USE, (PART RETROSPECTIVE), DEVELOPMENT ALSO INCLUDING LANDSCAPING, THE PROVISION OF A SUSTAINABLE DRAINAGE SYSTEM AND THE DEMOLITION OF A CONCRETE BATCHING TOWER

FORMER LAFARGE SITE, HOLLYBUSH LANE, NR ALDERSHOT HAMPSHIRE GU12 5QA

Thank you for consulting the Environment Agency on the above planning application which we received on 23 November 2012.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we **OBJECT** to the grant of planning permission and recommend refusal on this basis for the following reason:

Whilst the applicant has looked at surface water flooding up to the 1 in 100 year flood event they have not demonstrated that surface water flooding from the proposed development will be safely contained on site, up to and including a 1 in 100 year storm with allowance for climate change. The applicant should set the % of climate change in line with the proposed lifetime of the development. Details of how to assess this can be found within National Planning Policy Framework (NPPF).

This may increase the flood risk both on site and in surrounding areas.

Environment Agency
Colvedene Court (Wessex Business Park) Wessex Way, Colden Common, Winchester, SO21 1WP.
Customer services line: 03708 506 506
www.environment-agency.gov.uk

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Overcoming our objection

The applicant must demonstrate through their surface water strategy that the proposed development will not create an increased risk of flooding from surface water. The surface water strategy should be carried out in accordance with NPPF and the associated practice guidance, giving preference to infiltration over discharge to a watercourse, which in turn is preferable to discharge to surface water sewer.

The surface water strategy should clearly show that:

- Surface water for up to the 1 in 30 year storm event should be safely contained within the proposed drainage network. It is acceptable to partially flood the site in the 1 in 100 year plus suitable allowance for climate change storm event, however this water should be safely contained on site. Where this flooding will be within roads or pathways, the applicants must ensure that safe access and egress is still available.

Advice to Local Planning Authority (LPA) / Applicant

Guidance on the preparation of surface water strategies can be found in the Defra/Environment Agency publication "Preliminary rainfall runoff management for developments". Guidance on climate change allowances can be found within NPPF.

Sustainable Drainage

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible.

A well designed drainage scheme will involve a number of SUDS features in sequence, forming a Surface water management train. A management train will incrementally improve the quantity and quality of surface water runoff reducing the need for a single, large attenuation feature.

The variety of SUDS techniques available means that virtually any development should be able to include a scheme based around these principles.

SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

Further information on SUDS can be found in:

- PPS25 Practice Guide
- CIRIA C522 document Sustainable Drainage Systems – design manual for England and Wales
- CIRIA C697 document SUDS manual
- The Interim Code of Practice for Sustainable Drainage Systems. The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SUDS.

The Interim Code of Practice is available on both the Environment Agency's website:

www.environment-agency.gov.uk and CIRIA's website: www.ciria.org.uk

The Environment Agency offer a free enquiry service, where we can review the revised Flood Risk Assessment (FRA), prior to it being resubmitted to the local authority. Further information concerning the service can be found on our website at:

<http://www.environment-agency.gov.uk/research/planning/33580.aspx>

If you have any queries regarding the information set out above please contact me on the number below.

Yours faithfully

Mr Jon Maskell
Senior Planning Advisor
Environment Agency

Direct dial 01962 764878

E-mail PlanningSSD@environment-agency.gov.uk