

Welborne Plan

Position Statement: Flooding and Sustainable Drainage Systems (SuDS)

**Fareham Borough Council
Environment Agency**

October 2014

CD-26

Position Statement

Flooding and Sustainable Drainage Systems

This position statement sets out the current position of the Environment Agency with regards to flooding and SuDS at Welborne. The purpose of this statement is to support the position of the Welborne Plan at the forthcoming examination hearing sessions with regards to these issues.

Fareham Borough Council has been informed of the respective position of the Environment Agency through their representation on the Welborne Plan and through on-going dialogue in order to provide an up-to-date position.

Environment Agency

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Agreement via email 03-Oct-2014

Introduction

1. This position statement aims to reaffirm the flooding and SuDS position of the Welborne Plan with the Environment Agency, in order to support the position of the Welborne Plan at the forthcoming examination hearing sessions.

Site Conditions

2. The Welborne site is situated between two rivers, the Meon and the Wallington, and generally slopes down towards the south. The majority of the site is underlain by permeable chalk; however the southern part of the site is underlain by impermeable clay.

Flood Risk

3. The Welborne Plan is supported by the Partnership for Urban South Hampshire (PUSH) Strategic Flood Risk Assessment, December 2007 (LD01). Evidence shows the site to not be at risk of fluvial flooding, although there is a risk that if left unmitigated the development could potentially increase the risk of flooding downstream. Furthermore, flooding from surface water run-off has been identified to potentially also be an issue.
4. In response to this, policy WEL39, as with other strategic sites, requires the site promoters to further assess the flood risk of the site by requiring that they carry out a Flood Risk Assessment for the development site, to demonstrate that the proposed development will not increase flood risk on the Welborne site or elsewhere.

SuDS - Planning Requirements

5. In order to ensure that the site does not give rise to downstream flooding and to ensure that adequate provision is made to manage surface water arising on the site, policy WEL39 requires a Sustainable Drainage System (SuDS) to be integrated throughout the site.
6. The approach to delivering a SuDS scheme, as outlined in policy WEL39 of the Welborne Plan is for a comprehensive SuDS Strategy to accompany the outline planning application. This Strategy must detail the principles of delivery, the future management and maintenance of any schemes and demonstrate that:
 - Surface water arising from the development will be managed within the site, with a minimum requirement for no net increase in run-off rates and volumes;
 - The proposed SuDS system follows the SuDS management train¹; and
 - The SuDS is designed to control run-off and prevent flooding of property across a range of events up to and including the 1% (1 in 100 year) probability event, with a 30% allowance for climate change.

¹ [Susdrain - SuDS management train](#)

7. The SuDS Strategy will also need to contain information on the type, location and scale of the SuDS features required to achieve those requirements, all of which must be supported by appropriate evidence to justify the approach taken. The SuDS Strategy accompanying the outline planning application should be developed in consultation with the Environment Agency.
8. A detailed SuDS Strategy for each phase of development will subsequently need to be submitted alongside the detailed planning application for each phase. Each detailed SuDS strategy will need to demonstrate how the physical SuDS measures that are proposed fit into the site-wide SuDS Strategy. As with the SuDS Strategy, the detailed SuDS proposals for each phase should be developed in consultation with the Environment Agency.
9. As each phase is built out, SuDS will need to be constructed alongside the development to ensure that each phase becomes self-sufficient in meeting the appropriate run-off rates.

SuDS – Delivery Principles

10. Policy WEL39 requires the SuDS at Welborne to be developed in line with the SuDS management train. This requires that surface water should as far as possible, be managed at source so SuDS features may be distributed throughout the site. The location of larger 'site control' features such as ponds should give consideration to existing drainage issues so that they are effective during storm events. If evidence indicates that larger 'site control' features are in line with the SuDS management train, ponds could be located in the south of the site (immediately north of the M27) which would contribute to the 'meadows' character area and help to improve biodiversity and provide good quality spaces.
11. The Welborne Plan also requires that all SuDS features should be designed to have gently sloping, natural sides which can be left open and do not pose a hazard or require additional protection measures to be installed. Smaller SuDS features should be designed in a way so that they integrate into streets and spaces and become an attractive feature of the urban environment. Any existing drainage channels or watercourses on-site should be incorporated into the SuDS scheme where possible, as these will form important existing natural flood management features on the site.
12. Development proposals will need to demonstrate that the long term management and maintenance measures for all existing and new water bodies and watercourses required to serve the development are in place to ensure their function as drainage, habitat and, where appropriate, public open space is retained and maintained for the long-term. Such measures can be secured by a section 106 legal agreement.
13. Once Schedule 3 of the Flood and Water Management Act 2010 has been enacted, it will be possible for on-site SuDS to be adopted by the SuDS Approval Body (SAB), whom according to current legislation will be Hampshire County Council.

14. In order for SuDS to be adopted by the SAB, all SuDS on-site will need to be designed to meet the National Standards which are currently being drafted by Defra. It is understood that these standards will be published in 2015.
15. The Department for Communities and Local Government (DCLG) September 2014 consultation document "*Delivering Sustainable Drainage Systems²*" sets out an "*alternative approach to the one envisaged in Flood and Water Management Act 2010*" and looks at delivering sustainable drainage systems through changes to the current planning regime, in which case Fareham Borough Council would become the approval and adoption body.
16. DCLG indicate that subject to the outcome of the consultation, "*any changes to planning policy would come into force in Spring 2015*" and as such, depending on the outcome of the consultation, the Welborne Plan is considered sufficiently flexible to address SuDS approval by either Hampshire County Council, or by Fareham Borough Council as the local planning authority. Furthermore, the delivery of the detailed SuDS scheme for each phase of development, through either approval approach, could be secured by the section 106 legal agreement.

Environment Agency

17. The Environment Agency strongly supports the following:
 - policy WEL39;
 - the supporting text to WEL39 in paragraphs 9.24 - 9.31;
 - the aims relating to flood risk and surface water drainage, including the objective to reduce risk downstream where possible;
 - the reference in this section to the SuDS management train and surface water being managed as close to source as possible;
 - emphasis on the multifunctional benefits of SuDS; and
 - the intention to reduce run-off rates and volumes which it is recognised meets the National Planning Policy Framework requirement that Local Plans should use opportunities offered by new development to reduce the causes and impacts of flooding.

² [DCLG Consultation 'Delivering Sustainable Drainage Systems' \(September 2014\)](#)