

Consultation Response of Planning Policy

Application No:	APP/21/00601
Address:	Land North of Solent Road, Havant
Development:	New headquarters building for Portsmouth Water
Case Officer:	David Eaves
Comments by:	Jacqueline Boulter
Date of Comments:	7 May 2025

Policy comments were previously provided in August 2021 and September 2023. This document supersedes those comments.

Policy Status:

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the Hampshire Minerals and Waste Plan form the development plan for the borough.

Principle of development:

Policies CS17 and AL2 of the adopted Local Plan seek to focus development within the defined settlement boundary. The land in question lies within the urban area as defined by these policies, and development is therefore supported in principle.

In addition, and more specifically, the adopted local plan includes an allocation for employment development on this site under Policy HB2 (site BD14 Solent Road North).

The adopted policy position therefore is supportive of development on this site in principle. Allocation Policy HB2 (site ref BD14) suggests detailed site level considerations.

Employment floorspace:

The allocation envisages 6,600sqm of employment floorspace. The proposal is for significantly less at less than 1,900sqm. The allocation floorspace represents an assessment of likely possible floorspace, not a target, and while efficient use of land must be considered, so must other site needs and constraints. The proposal floorspace has been significantly reduced following objections to a scheme of around 4,000sqm to address concerns and constraints.

Overall, the proposed employment provision is considered acceptable in policy terms.

Flood Risk:

According to national and local policy (CS15), development should be safe from flooding for its lifetime and not increase flood risk elsewhere.

The flood risk mapping available has changed a number of times during the lifetime of the application, both through the publication of the Council's updated Strategic Flood Risk Assessment and updated of national mapping provided by the Environment Agency. According to latest national mapping, the whole site lies in Flood Zones 2 and 3.

Given the risk on site, a sequential test would usually be required. However, national guidance allows an exemption from this requirement for allocated sites, where *'The site has been allocated for development and subject to the test at the plan making stage (provided the proposed development is consistent with the use for which the site was allocated and provided there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test)*. Although the extent of the area at risk on site may have changed since the allocation processes, assessments at the time noted that the 'whole /majority' of the site was at risk. The sequential test was therefore applied

during the allocation process, and it is therefore considered that a sequential test is not required for this application.

The applicant has submitted a site specific Flood Risk Assessment (FRA), informed by hydraulic modelling to assess the extent of the flood risk area more accurately than a Strategic Flood Risk Assessment or National Mapping is able to.

Works within the red line boundary to remove a culvert in the Hermitage Stream to the north of the development, construct a flood bund and flood storage have already been completed to reduce of the risk of flooding to the development. The applicant's FRA confirms that with these works completed, the site will remain flood free during the 1 in 100 year plus climate change scenario. The Environment Agency have confirmed that the applicants' submissions address any flood risk concerns and have withdrawn an earlier objection to the proposal (subject to conditions to ensure that the measures put in place are maintained for the lifetime of the development).

On this basis, it is considered that the application has successfully address national and local policy requirements in regard to flood risk.

Conclusion

The principle of the proposed development is supported by the fact that the site lies within the urban area and benefits from an allocation in the adopted local plan. The issue of flood risk, flagged in earlier policy comments as a key potential constraint, has now been satisfactorily addressed.