

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:	11 September 2023

Policy comments were previously provided in August 2021. 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 favours development on this site in principle. However, some detailed matters, most notably in relation to flood risk, will need to be satisfied.

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 amount of floorspace proposed is considered acceptable in policy terms.

Flood Risk:

Much of the site in the red line lies in fluvial FZ2 and 3.

It appears that in redesigning the scheme, the applicant is seeking to avoid built form on the areas at risk at the present day. However, it is not clear whether or how future risk can be avoided. Based on SFRA mapping, risk cannot be avoided, since the whole site is potentially at risk in the future with climate change taken into account.

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).'*

Risk at the site was known about and the sequential approach was considered during the allocation process. It is therefore considered that a sequential test cannot be required for this application.

The detailed site level consideration of risk becomes all the more critical, as development, according to national and local policy (SC15), should be safe for its lifetime and not increase flood risk elsewhere.

It is noted that the applicant has undertaken hydraulic modelling to assess the extent of the flood risk area more accurately and the FRA for the now superseded scheme concluded that planned flood alleviation works would address the risk and would not increase flood risk elsewhere. However, there does not yet appear to be agreement from the EA on the modelling, neither has the FRA been updated for the revised scheme.

It is suggested that if there remains any indication that the site lies in current or future functional floodplain (Zone 3b), then the proposal would be unacceptable, on the basis of national guidance on flood risk compatibility <https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2>. This indicated that office uses, classed as 'less vulnerable' development, are potentially acceptable in Flood Zones 1 – 3, but incompatible with functional floodplain.

Overall, a policy objection remains unless the EA is satisfied with the modelling being relied upon, and conclusions of an up to date FRA, in particular taking into account the extent of the functional floodplain, which had previously been highlighted as a particular concern.

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 key consideration regarding the sustainability of development of this site relates to flood risk. Further consultation with the EA should establish whether functional floodplain is avoided, and all flood risk concerns are satisfied.

If this overriding consideration can be addressed, other key considerations include:

- transport impacts and access arrangements
- on-site parking arrangements to satisfy the council's standards
- relationship with nearby residential properties (visual, noise etc)
- relationship with the conservation area
- TPO trees
- ecology impacts
- sustainable design

Allocation Policy HB2 (site ref BD14) further suggests detailed site level considerations.