Site Address:	Land north of Solent Road (adjacent to Bosmere Medical Centre) Havant
Proposal:	Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.

Application No:	APP/21/00601	Expiry Date:	21/10/21
Applicant:	Chancerygate (Erdington) Ltd		
Agent:	Dr C Lyons Tetra Tech Limited	Case Officer:	David Eaves
Ward:	Bedhampton (formerly St Faiths)		

Reason for Committee Consideration: At the request of Councillors Fairhurst, Gray and Munday

Density: N/A

Development Manager Recommendation: **GRANT PERMISSION**

Executive Summary:

The development includes a new Portsmouth Water Head Quarters building as Offices to carry out any operational or administrative functions. The building would be two storey and include parking to the east and west of the building. The access would be from Solent Road to the south and shared with existing medical facilities at The Bosmere Medical Centre and the Bosmere Pharmacy. The proposals include the widening of the access and improvements to sustainable access to the site.

The proposal would replace Portsmouth Waters existing inefficient and dated existing HQ to the north of the application site which is accessed off West Street. The location of the building close to retained Portsmouth Water facilities and the adjacent Brockhampton Springs is important for the operation of Portsmouth Water and is considered very important in providing efficient modern facilities and retaining critical employment in Havant.

In relation to the Principle of Development, the site is located in the built up area where development is considered acceptable in principle. Furthermore, the site is allocated in the Havant Borough Local Plan (Allocations) 2014 under policy HB2 for employment. The site reference is BD14 with an indicative floorspace of 6,600sqm and the potential to relocate Portsmouth Water Company's existing headquarters. The current proposal is for a lower floorspace provision and is considered acceptable in principle. In terms of the impact on the character and visual amenities of the area, it is considered that the two storey building and parking which are set well back from public vantage points would have a limited and acceptable impact on the character of the area and visual amenity. There would be an opening up of part of the Solent Road frontage as a result of the access widening and tree removal and it is therefore important to condition appropriate replacement planting and landscaping.

There are a number of Heritage considerations including the impact on a Listed Building, the Brockhampton Conservation Area and Archaeological Impacts. The Council's Principal Heritage Officer and the County Archaeologist raise no objections to the proposals which are considered to preserve the Conservation Area and the setting of the Listed Building.

The potential impacts on nearby residential properties have been considered in detail for example in relation to overlooking, siting, noise, lighting and the construction process. Subject to appropriate planning conditions the impacts are considered acceptable.

Highway impacts and the relationship to the Bosmere Medical Centre and Pharmacy have raised significant concerns and detailed representations. The proposed trip generation and routing has been modelled based on agreed modelling and with regard to consideration of the existing Portsmouth Water operation and staff. This has shown that Solent Road and the modelled junctions would operate within design capacity taking account of traffic growth.

The proposed site access and its use to serve the proposed development together with the existing health facilities has been considered in detail. This has resulted in design alterations which would take account of vehicle, cycle and pedestrian access requirements into The Bosmere Medical Centre and the Bosmere Pharmacy. This arrangement is considered to ensure an appropriate design to allow for safe and timely access into the health facilities and to the proposed Portsmouth Water HQ building.

The development would secure improvements to sustainable transport options along the Solent Road corridor, including financial contributions and the provision of a Travel Plan for staff. Parking is also provided to exceed the Council's Parking Standards.

The site lies within a flood risk area and a detailed Flood Risk Assessment has been submitted and assessed. Detailed proposals for surface water management have been proposed including some works which have already taken place. The Environment Agency and Local Lead Flood Authority are satisfied that the development is acceptable subject to planning conditions. Southern Water have raised no objections in relation to Foul drainage subject to separate consent(s).

Subject to appropriate conditions, contamination issues can be suitably addressed.

In relation to Ecological requirements, the application has been subject to a Habitats Regulations Assessment and Appropriate Assessment to address impacts on Solent European Sites through waterborne pollution and direct and functional loss of SPA/Ramsar supporting habitat. These would be addressed by the imposition of conditions and S106 requirements. On site ecology has been assessed and mitigation would be secured by planning condition.

In relation to trees the proposal results in the removal of a number of trees including TPO'd trees which is a negative aspect of the scheme to be weighed in the overall planning balance. The proposal includes significant new planting and landscaping and subject to conditions is, on balance, considered acceptable.

In relation to sustainability the development would be required to meet BREEAM 'very good' and would incorporate sustainable features such as PV panels, EV charging and reduced water use.

The development would be subject to detailed planning conditions and a S106

Agreement to ensure that the development is acceptable and represents sustainable development.

Overall, the development is considered critical to the business requirements of Portsmouth Water, retaining their Headquarters in the Borough adjacent to the Bedhampton Springs and retaining employment. The proposal would also help realise a longstanding policy requirement of the Havant Borough Local Plan providing employment on the site whilst freeing up the West Street site for much needed housing development. Following detailed assessment, the development is considered to have an acceptable impact on the area including health services and nearby residential properties.

1 Site Description

1.1 The application site lies within the built up area of Havant to the North of Solent Road within a mixed area of retail, business and residential uses.

1.2 The site itself has a site area of approximately 1.5ha, mainly a field with areas of hard surfacing in the north-eastern part formerly used as tennis courts (long abandoned) in association with the wider Portsmouth Water site. To the boundaries of the site are significant trees (including trees subject to Group Tree Preservation Orders) and hedges but the internal area is mainly open and grassed. The Brockhampton Stream runs along the northern and part western side of the site. Brockhampton Conservation Area runs to the west, north and east of the site and a small part of the application site (north-east) lies within the Conservation Area.

1.3 The site surroundings are as follows:

South:

To the south is Solent Road which leads from the B2149 Park Road South to Brockhampton Road. To the opposite side of Solent Road is Solent Trade Park which is a large building divided into units with various occupiers including Halfords Autocentre, Topps Tiles, Screwfix, Easy Bathrooms, Tool Station and Plumlink. These uses include retail and trade counters. Two other units are further to the west occupied by Havant Motor Factors and E.M.P Tooling Services.

The existing access to the Bosmere Medical Centre (BMC) and Bosmere Pharmacy from Solent Road runs to the south east corner of the application site as it fronts Solent Road.

West:

To the west of the site on its southern part are groups of large TPO'd trees then a section with more open boundary marked with a brick wall. Manor Court lies to the west which is an attractive flatted development with No's 1-6 closest to the site boundary and No's 7-22 set further off beyond the trees and other retained grass and landscaped area. To the northern part of the western boundary beyond a brick wall are the more historic parts of the wider Portsmouth Water site including the Tannery and open storage areas. Further to the west and not directly adjoining the site is The Old Manor House a Grade 2 Listed Building.

North:

To the north of the site are the extensive landscaped grounds of the existing

Portsmouth Water headquarters site with Brockhampton springs, two large ponds and attractive trees and landscaping areas. The existing Portsmouth Water buildings are located further to the north beyond the landscaped grounds with these buildings accessed from West Street.

East:

To the southern part of the eastern boundary is The Bosmere Medical Centre (BMC) and Bosmere Pharmacy with associated car parking. The buildings also form part of the southern boundary of the application site where it extends in an easterly direction.

Residential properties (No's 8, 10 and 12 Brockhampton Lane) back onto the application site, and then furthest to the north eastern boundary industrial units in The Tanneries Industrial Estate and particularly unit 18 are beyond the boundary.

2 Planning History

2.1 The relevant planning history is given below:

APP/21/00306 - Fell 1No. ornamental tree (on land to left of Brockhampton Road Entrance). Within conservation area of Brockhampton, Raise No Objection 11/05/2021

APP/20/00589 - 1No. Lime Tree (T3 on plan) crown raise to 4m, over footpath and garage, remove epicormic growth around base. Subject to TPO 1309 A1. ., PERM,21/08/2020

APP/20/00588 -Fell row of fir trees (G1&G2 on plan); Fell 1No. Thorn bush (T1 on plan); Fell 1No. Holly bush/tree (T2 on plan). All within Conservation Area of Brockhampton., Raise No Objection ,21/08/2020

GEN/19/00674 - New headquarters building for Portsmouth Water and new commercial buildings – This pre-application submission was subject to a Development Consultation Forum on the 22nd October 2019

02/61715/000 Outline application for residential development of 45 dwellings and medical centre with access onto Solent Road. Refused 3rd February 2003.

Adjacent Site (Bosmere Medical Practice and Bosmere Pharmacy)

03/61715/001 Erection of a part 2 storey, part single storey building providing a primary medical care centre with associated car parking taking vehicular access from Solent Road. Permitted 6th October 2006.

07/61715/004 Variation of Condition 8 and relief of Condition 13 of Planning Permission 03/61715/001, to allow modifications to the site entrance construction together with alterations to the permitted width and detailing. Permitted 07/61715/004

3 Proposal

3.1 Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works;

including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.

3.2 The proposal incorporates a two storey office building with a proposed floorspace of 1858sqm. In addition, there is car parking for 100 cars and covered cycle parking. A sub station is also proposed near the access to the site. The development would be accessed via a shared access with Bosmere Medical Practice and Bosmere Pharmacy with the accessed altered and widened to facilitate this.

4 Policy Considerations

National Planning Policy Framework
Havant Borough Council Borough Design Guide SPD December 2011
Havant Borough Council Parking SPD July 2016 (Partially updated September 2019)

Havant Borough Local Plan (Core Strategy) March 2011

CS11	(Protecting and Enhancing the Special Environment and Heritage of Havant Borough)
CS14	(Efficient Use of Resources)
CS15	(Flood and Coastal Erosion)
CS16	(High Quality Design)
CS17	(Concentration and Distribution of Development within the Urban Areas)
CS2	(Employment)
CS20	(Transport and Access Strategy)
CS21	(Developer Requirements)
CS3	(Skills and Employability)
DM10	(Pollution)
DM11	(Planning for More Sustainable Travel)
DM12	(Mitigating the Impacts of Travel)
DM14	(Car and Cycle Parking on Development (excluding residential))
DM16	(Freight Transport)
DM3	(Protection of Existing Employment and Tourism Sites)
DM8	(Conservation, Protection and Enhancement of Existing Natural Features)

Havant Borough Local Plan (Allocations) July 2014

DM17	(Contaminated Land)
AL1	(Presumption in Favour of Sustainable Development)
AL2	(Urban Area Boundaries and Undeveloped Gaps between Settlements)

Listed Building Grade: The Old Manor House a Grade 2 Listed Building lies to the west and is not directly adjoining the site.
Conservation Area: A small part of the application site (north-east) lies within Brockhampton Conservation Area.

5 Statutory and Non Statutory Consultations

Please Note that the final comments of consultees are included below unless otherwise stated – Earlier Consultation comments are included in **Annex A**

Councillor Fairhurst
I have had many concerns raised with me regarding the increase of traffic and loss of space for residents attending Bosmere surgery or the pharmacy.

As it has raised such strong interest within the community I feel it is important for it to be brought before the committee.

Councillor Gray
As ward councillor for Bedhampton I would like this planning application to be called in on the following grounds:

1. the number of objections submitted by the public
2. the impact on the patients at Bosmere Medical Centre. As many objectors have explained, there is a lot of traffic in and out of the Medical Centre at present, which makes is challenging to access the centre on foot. The extra traffic generated by the plans will exacerbate the problem.

Councillor Munday
I realise that I am no longer the local ward councillor for this site, but I would ask that this goes before the Planning Committee for decision. There have been significant concerns expressed by local residents and I feel that the application needs to be assessed in a public forum.

Former Councillor Pike (from 2021)

In principle, I have no objection to the development, however I have more detailed comments that I believe could be addressed through minor amendments, or a withdrawal/resubmission.

I take as read that you will be checking compliance with our current standards in areas such as separate between buildings (e.g. with Manor Court), and that the current Parking SPD is complied with.

Concerns about flooding have been raised by the Environment Agency, and in this particularly sensitive area, I believe these need full examination and mitigation where required.

I support the comments of the County Ecologist and the HBC Landscape Architect, and I hope that the recommendations on planting schemes will be taken on board.

Finally, and most importantly, it is difficult to give an informed opinion on the transport aspects of this development as there is no published comments from Hampshire County Council, but I give the following comments:

1. Having a single access serving three very different uses (office, industrial units and surgery), leads itself to a variety of conflicts. Most notable, the pedestrian and cycle access to the office and surgery (from the west) is contrived and gives them multiple risks from cars and lorries.
2. This development should be seeking to uplift the number of people walking and cycling to work, and the access will not enable that. I would expect the access to by LTN 1/20 compliant for cycling, which it is not.
3. The lorry access and turning for the industrial units is poor. The swept path analysis show that with perfect driving an HGV will only marginally clear the access road and this gives rise to the potential for reversing movements conflicting with the main access road. The reversing also goes very close to the pedestrian crossing which is completely unsatisfactory.
4. The Mode Transport study has errors, e.g. references to the 74 bus that stopped years ago, and you would expect it to correctly summarise the current situation.
5. HCC have not asked for proper consideration to be given to the impact on the Park Road South / Solent Road junction, which should have been looked at.

The queues down Solent Road in the evening peak can take a long time to clear (because of the congestion caused by the poor management by Highways England of the A27 roundabout).

6. The split of vehicles between the different accesses is not appropriate. It should be informed by PWC's own data of where staff live. I would suggest that that data would show a greater percentage of vehicles would use the Solent Road / Park Road South junction.
7. HCC asked for an analysis of walking and cycling routes/improvements - I can find no attempt to answer that request. Section 6 of the Mode Transport study is a statement of the obvious, and adds nothing to improving walking and cycling to the site.

In summary, looking at the information provided, I believe the current access arrangements are inadequate, dangerous and will not increase the number of people walking/cycling to this development. I think by combining access for the three very different uses it is almost impossible to create a safe environment, and consideration should be given to accessing the industrial units separately. There is huge public concern about the access arrangements which cannot be dismissed by desktop exercises that have used either incorrect data or perfect scenarios - you only have to look at the other developments in Solent Road to know that lorries arrive together and need to be accommodated, and van driving to these units has increased considerably due to more home deliveries. The fact that the surgery access is the nearest unrestricted parking will make it the overflow site for any of these eventualities.

HBC Arboriculturalist

Following our discussion and the submitted Arboricultural information I offer the following comments:

Site description

The site features an open expanse of grassland, with most of the vegetation concentrated along its edges. A line of trees marks the southern boundary, offering visual screening from Solent Road. On the eastern side, the site is bordered by a mature hedgerow and the Bosmere Medical Centre. To the west, a brick wall separates the area from nearby residential properties. The northern edge is defined by a stream, which acts as a natural divider between the site and a lake with landscaped surroundings, part of the Brockhampton Conservation Area. Trees are mainly situated along the perimeter of the site, representing a variety of species and age groups.

Tree works

To accommodate the proposed office building, car park, access road, and drainage system, six individual trees are highlighted for removal. This includes one high-quality tree (T7, Category A), one of moderate quality (T37, Category B), and five of low quality (T15, T16, T17, T18, and T30, all Category C).

In addition, two tree groups will be removed: one moderate-quality group (G29, Category B) and one of low quality (G8, Category C).

Partial removal is also planned for one tree group (G14) and one hedgerow (H27), both classified as low quality (Category C). Approximately 70% of the southern canopy of G14 will be removed, leaving around two trees in the northern section. For H27, around 30% of the southern canopy will be removed to allow for the construction of the access road and footpath.

Construction activities are proposed within the Root Protection Areas (RPAs) of several trees that are to be retained as part of the development. This encroachment has been 'mitigated' within the Arboricultural Method Statement (AMS), detailed in Section 5.6 of the submitted Arboricultural Impact Assessment (AIA). The measures outlined in the AMS appear to be appropriate and sufficient for managing the potential impacts of these works. It is vital that these measures be strictly adhered to on-site, with regular monitoring by a qualified arboricultural consultant to ensure compliance and address any unforeseen issues.

Recommendation

The tree loss for this site is unacceptable in arboricultural terms, and I raise objection, however if permission is given it must be on balance of planning need, include a comprehensive mitigation planting plan and the Arboricultural condition as follows:

Condition should permission be recommended:

The development hereby permitted shall only be carried out in accordance with the *Arboricultural Impact Appraisal and Preliminary Arboricultural Method Statement (Reference* SLR Project No.: 402.064821.00002*) and British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations).*
Reason: To ensure the continuity of amenity value afforded by the trees in question and in accordance with policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.

Building Control

Uploaded 04/10/23
Comments
The technical information for the proposed cladding would appear to show that it would have the necessary fire resistance.

Community Infrastructure HBC

Final Comments
S106 monitoring fees

The council charges a fee to monitor all planning obligations as set out in the CIL Regulations and this is decided at a cost per head of term contained within the obligation and is in addition to the legal charge for drafting and checking the obligation. Havant Borough Council monitors and discharges all Hampshire County Council Covenants on behalf of the County and the charges below also apply for each Hampshire County Council Head of Term.

From 1 April 2024

- £914 per non-financial head of term (outside the scope of VAT)
- 5% of cost per Havant Borough Council financial head of term (outside the scope of VAT)

This contribution is indexed in accordance with the CPI.

Further Comments:

Uploaded 18/09/23

S106

A S106 is likely given the scale and location of the site.

Heads of Terms arising out of Consultee responses including but not limited to:

1. SUDS/SUDS Bond (Bond not necessary if Southern Water have agreed to adopt SUDS once installed)
2. HBC Monitoring Fees*
3. Highway Works (HCC)
4. Travel Plan (HCC)
5. HCC Monitoring Fees
6. Solent Wader Brent Goose Strategy Mitigation

SEE THE HBC DEVELOPER CONTRIBUTIONS GUIDE FOR ADDITIONAL INFORMATION:

Latest version accessible from: https://www.havant.gov.uk/community-infrastructure-levy

*HBC Monitoring Fees: As part of the 'Heads of Terms' it would be necessary to include monitoring fees for any HBC Head of Term. The amended CIL Regulations effective 1/9/19 regularise the collection of S106 monitoring fees. We have an agreed schedule of charges, due to be updated 1/4/23:

From 1 April 2023

- £846 per non-financial head of term (outside the scope of VAT)
- 5% of cost per financial head of term (outside the scope of VAT)

Monitoring fee is capped at a maximum of £12,205 per application. This cap only applies major applications (up to 250 Homes) without long tern ecological management which may also be subject to separate negotiation.

The sums charged will be increased and apply to S106 agreements drafted after 31/3/23.

Heritage/Conservation HBC

UPDATED RESPONSE FOLLOWING THE SUBMISSION OF AMENDED PLANS IN AUGUST 2023 (original response was dated 8/9/2021)

Proposal (amended description)

Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.

The Site

The site is an open section of land located in Havant, north of Solent Road. It lies to the south of the existing Portsmouth Water premises. To the east is the Bosmere Medical

practice building and to the west lies Brockhampton Road. The site is located adjacent to the Brockhampton Conservation Area on two sides, with the far most eastern corner falling within the conservation area boundary. To the west on Brockhampton Road, lies The Old Manor House, a Grade II listed property. There are no existing buildings on the site and it is enclosed by a line of trees on the west.

Legislative and Policy Context

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("1990 Act") requires local planning authorities to have special regard to the desirability of preserving a listed building, its setting or any features of special architectural or historic interest when considering whether to grant listed building consent.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

National Planning Policy Framework

Chapter 16 of the NPPF (December 2024) relates to the Historic Environment including paragraphs 202-221. The following paragraphs are most relevant to the determination of this application:

Para 212 states that:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

Para 214 states that:

'Where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 208 requires this harm to be weighed against the public benefits of the proposed development

Para 215 states that:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

Historic England Advice

In addition to the advice laid out in the NPPF, Historic England has published planning advice in the form of Good Practice Advice Notes (GPA's) and Historic England Advice

Notes (HEANs). Most relevant to this application will be GPA2 – Managing Significance in Decision Taking in the Historic Environment and GPA3 – Setting and Views.

GPA2 states at paragraph 4 - 'The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest'. It also advises that an assessment of significance is required as part of the application process including the understanding of the nature of the significance, the extent of that significance and level of significance. Paragraph 11 states 'to accord with the NPPF, the application will need to undertake an assessment of significance to inform the application process an extent necessary to understand the potential impact (positive or negative) of the proposal and the level of thoroughness proportionate to the relative importance of the asset whose fabric or setting affected'.

GPA3; the Setting of Heritage Assets defines setting as "the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral".

GPA3 advises a broad approach to assessment, undertaken a series of steps that apply proportionately to the complexity of the case, from straightforward to complex;

Step 1 – identify which heritage assets and their settings are affected

Step 2 – Assess the degree to which these settings make a contribution to the significance of the heritage asset or allow significance to be appreciated.

Step 3 – Assess the effects of the proposed development, whether the beneficial or harmful, on that significance or o the ability to appreciate it.

Step 4 – Explore ways to maximise enhancement and avoid or minimise harm.

Step 5 – Make and document the decision and monitor outcomes.

Havant Borough Local Plan (Core Strategy 2011 and Allocations Plan 2014)

Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of the Havant Borough

Policy CS11 (4) states that planning permission will be granted for development which:

'Protects and where appropriate enhances the borough's statutory and non-statutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest'.

Policy CS16 – High Quality Design

Policy CP16 (1a) of the Core Strategy states that:

'Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design:

a) *Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site'.*

b) *Integrates with existing local landscape features, promotes wildlife and biodiversity and/or applies characteristics of the local area into the design of a scheme wherever possible to create variety and interest;*
c) *Uses the characteristics of the locality to help inform the design of the new development including heights, massing, existing buildings lines, plot widths and depths, materials and proportions of windows and doors;*
d) *Is well connected to and integrates with the immediate local area and the wider area by linking to existing pedestrian and cycle routes and encouraging people to use public transport where possible; and*
e) *The development does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise and overlooking.*

Policy DM20 (Allocations Plan) - Historic Assets

Policy DM20 states that:

'Planning permission will be granted for development proposals that conserves and enhances the historic assets of Havant. It also states that application which affect, or have the potential to affect, heritage assets are expected to provide a Heritage Statement that:

1. Describe the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal.

2. Sets out the impact of the development on the heritage assets and mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets.

Proposal

The amended scheme still includes a proposed building for the new Portsmouth Water HQ, comprising 2no. buildings along with parking and landscaping and a widened access. This is in the same position as previously proposed. The main change is that the employment buildings have been removed from the scheme., leaving an area of open space to the south west of the proposed office building.

Assessment

There is no change in the assessment of the scheme which was provided in the original response – 8/9/2021. This concluded that the proposed development would not result in harm to the Old Manor House, nor the Brockhampton CA.

Conclusion

NO OBJECTION

Coastal Engineer HBC

Response:
Thank you for consulting with Coastal Partners on the above application, I can confirm we have no objection in principle to the proposed development from a tidal flood risk perspective.

The majority of the site is shown to lie within the Environment Agency's present day Flood Zone 3, however this appears to be fluvial flood risk from Brockhampton Springs. According to the Partnership for South Hampshire's Strategic Flood Risk Assessment (PfSH SFRA), the site is not at significant (greater than 1 in 200 year event) tidal flood risk now or in 2115 (lifetime of the development). However, the PfSH SFRA is currently being updated to reflect current climate change guidance. The latest guidance for calculating climate change sea level allowances can be found here: www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#sea-level-allowances.

As required by the NPPF for all developments located within present day Flood Zones 2 or 3, or greater than 1.0 hectare, the applicant has submitted a Flood Risk Assessment (FRA) outlining how flood risk at the site will be mitigated.

We recommend that the Environment Agency and the LLFA are consulted on the fluvial and surface water flood risk to the site and modelling undertaken.

County Archaeologist

Thank you for your consultation regarding the amended plans. I note that the applicant has submitted the result of an archaeological evaluation which did not find any notable archaeological remains at the site.

I am happy to confirm that in the light of this I would not raise any further archaeological issues.

HBC Ecologist

Uploaded 08/02/24

The application is now accompanied by an Ecology Addendum and Plan (Ecology Solutions, September 2023), alongside the previously submitted amended Ecological Assessment (Ecology Solutions, June 2023), Habitats Regulations Assessment (Ecology Solutions, June 2023) and Biodiversity Net Gain Assessment and Calculations (Ecology Solutions, June 2023).

The Ecology Addendum includes further information relating to the proposed wildflower grassland as well as proposed bat and bird box enhancement features. Information provided for the grassland enhancement areas include details of proposed over-sown herbaceous species as well as management prescriptions. These details are sufficient.

If you are minded to grant permission, can I suggest that ecological measures are secured by condition.

Development shall proceed in accordance with the ecological avoidance, mitigation, compensation and enhancement measures as detailed in the Ecology Addendum and Plan (Ecology Solutions, September 2023), Ecological Assessment (Ecology Solutions, June 2023), Habitats Regulations Assessment (Ecology Solutions, June 2023) and Biodiversity Net Gain Assessment and Calculations (Ecology Solutions, June 2023) unless otherwise agreed in writing by the Local Planning Authority. Reason: to provide ecological protection and enhancement in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Crime Prevention -Major Apps

No comments received

Economic Development HBC

08.05.25

Without the additional business units Economic Development wont object to or endorse this application.

We would require an Employment & Skills Plan to be entered into which adheres to the National Skills Academy for Construction Client Based Approach, or a financial contribution calculated from the Social Value Portal KPIs to enable us to address the low skills attainment across the borough.

Economic Development would help to write and facilitate the Employment & Skills Plan should Portsmouth Water decide to proceed with it.

Education Department

No comments received

Engineering / Drainage HBC

No comments received

Environment Agency

06.02.24

Environment Agency Position
We have reviewed the submitted information and consider that it satisfactorily addresses our earlier concerns.

Subject to the condition below, we therefore withdraw our previous objection.

We request that the following condition be attached to any planning permission granted, and that the details in relation to the condition be submitted and approved by the Local Planning Authority. The proposed development will only meet the National Planning Policy Framework (NPPF) policy to not increase flood risk if the following planning condition is included.

Condition
The development hereby permitted must not be commenced until such time as a scheme to ensure protection and maintenance of the newly constructed flood bund and flood storage areas has been submitted to, and approved in writing by, the local planning authority.

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason
To ensure the structural integrity of the existing flood defences thereby reducing the risk of flooding, and to reduce the risk of flooding to the proposed development and future users.

Advice to LPA
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, with details included in the application document "Flood Alleviation Completion Report". These works were carried out to reduce of the risk of flooding to the development and therefore it is important that they are maintained for the lifetime of the development.

Advice to LPA/Applicant

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience
Code of practice for property flood resilience C790 (ciria.org)

British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Environmental Permit
The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

• on or within 8 metres of a main river (16 metres if tidal)
• on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
• on or within 16 metres of a sea defence
• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
• in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once

planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Environmental Health

11/12/23
Observations / Comments:
I refer to the above application under the Town & Country Planning Acts passed to this Service for comment.

I have read the recent additional amended documentation provided by the applicant, including that of the TRC Noise impact assessment dated June 2023, and can comment as follows:

The most significant change to be noted, is that the proposal for four commercial units in flexible B2/B8 or E(g)(iii) use, now appears to have been withdrawn.

Remaining for consideration is the construction of the office block for Portsmouth Water, installation of roof mounted air moving plant & / or equipment to service this block, plus a section on the right hand side facing, for a future tenant with the potential for additional roof mounted air moving plant & / or equipment to service said section.

With regard to the assessed noise impact from fixed plant noise serving the main office block, it has been shown in the impact assessment referred to above, that the generated noise levels are well below the existing background noise level, assessed at the closest receptor. Therefore no impact is predicted by the consultants, based on a BS4142:2014 assessment.

Whilst this office raises no further objection to this application, I would ask that the following conditions and informative, be included in any approved decision notice:

Condition 1: Noise from plant and equipment
If the right hand side of the proposed office block is leased out in the future, and requires additional air moving plant and equipment to be installed, an additional acoustic assessment to show that the rating level of any plant and / or equipment, fixed or mobile, for use as part of their unit, will be at least 5 dB below the existing background levels, which must be submitted to and approved in writing by the Local Planning Authority. The assessment must be carried out by a suitably qualified acoustic consultant / engineer and be in accordance with BS4142: 2014 Methods for rating and assessing industrial and commercial sound. Background levels have been established at nearest residential receptors, in the TRC Noise Impact Assessment report dated June 2023.
Reason: To ensure the amenities of nearby residential properties are not impacted upon by any external noise levels and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework Condition

2: Construction Environmental Management Plan
The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The following should be added to any CEMP submitted and should be in operation for all phases of the development i.e. demolition, excavation, clearance and construction: The plan should include, but not be limited to:
a. Procedures for maintaining good public relations including complaint management,

public consultation and liaison and site management contact details
b. Arrangements for liaison with the Council's Pollution Control Team
c. All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08:00 Hours and 18:00 Hours on Mondays to Fridays and 08:00 and 13:00 Hours on Saturdays and at no time on Sundays and Bank Holidays.
d. Deliveries to and removal of materials, plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above.
e. Details of measures to be employed to control the emission of noise during the above phases to be provided. BS5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and Part 2: Vibration (BSI, 2014v) provide guidance on the requirements and indicative noise and vibration levels and criteria;
f. Procedures for emergency deviation of the agreed working hours
g. Measures for controlling the use of site lighting during all phases, whether required for safe working or for security purposes, to ensure no impact on any nearby residential receptors;
h. Control measures for dust and other air-borne pollutants. It should advise as to what measures are to be put in place for the control of any dust that might emanate from the development site. Furthermore the methods of dust control should be in accordance with the guidance as laid out in the BRE Report 456 - Control of Dust from Construction and Demolition activities, and also the IAQM Guidance on the assessment of dust from demolition and construction 2014. It should also be noted that besides the keeping of haul roads damp during dry weather conditions, any areas where tracked excavators, dozers and the like are working, are also be kept damp at all times;
i. No bonfires to take place on the site at any time;
j. A scheme for recycling/disposing of waste resulting from excavation and construction works is to be implemented
Reason: To minimise disturbance to all nearby sensitive receptors and to ensure the amenities of the surrounding occupiers are not unduly impacted upon, during all phases of the development.

Condition 3: Piling
If piling is to be undertaken on this site, the least intrusive noise and vibration method of piling shall be employed at this site. This should be accompanied by a justification as to the reasons why a particular piling method has been chosen, and additionally the proposed mitigation methods to be employed, to ensure minimal impact on nearest residential receptors.
Reason: To ensure the amenities of nearby residential properties are not impacted upon by any external noise or vibration levels during any piling operations, and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework

Informative:

External Lighting:
It would appear from the submitted External Impact Lighting assessment dated March 2023, that there should be limited, if any, impact on neighbouring properties. However if complaints should happen to arise after completion, advising of light spill / nuisance impacting on residential receptors, this will be investigated under the relevant nuisance legislation, & the developer / applicant may thereafter be required to carry out any remedial measures necessary to mitigate the problem.

Please do not hesitate to contact me if you wish to discuss any of the above matters raised or would like further explanation.

The above comments shall in no way prejudice any response / comments that may be or have been, submitted by Jonathan Driver, Environmental Control officer, Environmental Health.

Environmental Health: (Environmental Control):

18/06/24

Observations / Comments:

Contamination

No change in advice. The 'unexpected contamination' condition proposed by Portsmouth Water ('condition 3' 21/11/2023) will be sufficient to manage residual uncertainty with respect to the chemical quality of soils at the site. Use of this condition is supported, and I have no other recommendations to make in respect of contamination risk

Transport Demand & Air Quality

The previous assessment was based upon 818 AADT. The latest revision to the development proposals includes a significant reduction in quantum, with a resulting ~65%-75% reduction in anticipated transport demand. As might be expected, this has reduced the direct air quality impact of the development proposals, given that no on-site combustion processes are anticipated & that transport demand is reduced.

The question against planning policy (NPPF 2023 180 e) & to a lesser extent, the emerging local plan) is 'are the proposals to offset emissions (to air) sufficient to mitigate &/or offset the likely magnitude of development-related harms?'.

It was concluded that this was probably the case for the previous mixed-use scheme, and the balance has to some extent improved under the office-(PWC HQ-)only scheme.

The policy environment has however tightened since the original application date, and I note that the local Highways Authority has made material representation with respect to sustainable travel, the local transport plan and transport mode-shift; and integrating these areas into an integral package to achieve transport, air quality and climate-change policy objectives.

I would highlight that there is additional support from air quality policy objectives for the enhancements sought by the Highways Authority where these seek to;

• avoid disproportionate effects on the local road network, e.g. at busy junctions, or through operation of vehicle gates at the site access
• contribute to the facilitation of sustainable and active travel choices by Portsmouth Water employees (e.g. s278 access works)
• facilitate the shift of existing trips on the local road network currently made by motor car, to sustainable and active modes of travel (e.g. s106 contribution to the aspirational scheme along the Solent Road Corridor)

I would also note that the Highway Authority had previously raised similar concerns

about the framework travel plan, and that these have now been resolved in the latest version.

I had previously commented that the overall parking quantum appeared to have potential to fall short of SPD, and that this could be supported as applying natural pressure on trips by private motor car (assisting modal-shift). It now appears that that scheme has a slight over-provision relative to SPD, which could be argued to have the opposite effect. I do note the EV servicing provision level of 20% of parking spaces, and would support this on Air Quality grounds as a measure supporting use of (U)LEV's and reduction in combustion derived air pollutants..

It is possible that the over-provision will contribute to the parking quantum of an anticipated future re-submission of a revised scheme of commercial development – and the planning question will be whether or not the quantum being sought under this scheme is excessive for the scale of the current scheme given the inherent sustainability of this location and the requirements & objectives of LTP4.

Officer Comment: *Whilst the application proposes an over-provision of parking compared to the Councils Parking SPD 2016 it is considered critical to ensure that overspill parking does not take place for example to the Medical Practice or nearby residential roads*

Air Quality – Emissions offsetting

Notwithstanding the tilted balance arising from the reduced development quantum, I have reviewed the design & access statement, energy & sustainability statement and BREEAM pre-assessment.

I note some enhancements arising from amendment to the Building Regulations concerning the thermal performance of building elements, and also an apparent significant enhancement to the solar PV provision at the site, despite the reduction in available roof-space.

In respect of the latter, I would flag an anomaly in how this provision has been accounted for – the proposal has been uprated from 15.5 kWp to 40 kWp (88.4 sq.m to 183 sq.m, or 52-108 panels); however, the contribution from solar to energy use offsetting has fallen from 11083 to just 2620 kWh/annum. This would appear to be either a simple error, or an account of the solar contribution to the development energy needs only (e.g. ignoring energy exported back to the grid). It may be relevant for climate & sustainability policy purposes for this apparent anomaly to be resolved. It is not material for air quality purposes, for the reasons described above.

No objections arise.

Surface water Drainage (SuDS) & Pollution

Advice as previously. No objections arise. The comments of Portsmouth Water Company in respect of the need for staff parking areas to be served by an interceptor chamber; I would comment that this is not a strict requirement for general car parking areas (staff visitors). Yard areas serving frequent LGV & HGV movements, or the offloading/handling of bulk liquid or powdered products would be required to be served by a suitable interceptor unit – but it is understood that this is unlikely to apply here.

This notwithstanding, the conditions proposed by Portsmouth Water (numbered 1 & 2,

21/11/2023) are supported for surety.

Construction Management (CEMP, Noise, Piling, Solution Features)

CEMP

I was not able to identify a revised CEMP within the application documents, and consequently the recommendations given within (our ref-) CONS/22/01113 13/10/2022 remain valid. I note that both Environmental Health and the Portsmouth Water have recommended construction management conditions in respect of a CEMP & Piling Condition.

There is remarkably little overlap between the specific provisions of the respective CEMP conditions, so imposition of both (without consolidation) would not apply duplicate controls, and consequently consolidation for the purpose of minimising the number of imposed conditions would have minimal value.

Piling / Noise

In respect of piling, the general 'prohibition without prior approval of method' condition proposed by Portsmouth Water ('Condition 4' 21/11/2023) would provide the opportunity sought by Environmental Health to avoid the use of unnecessarily noisy piling methods. I would suggest the following consolidation (to replace Condition 4 21/11/2023 & Condition 3 CONS/23/02739 11/12/2023);

Condition [X]

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

***Reason**-To ensure that any proposed Piling or deep foundation using penetrative methods does not harm either groundwater resources or the amenity of nearby residents, in line with paragraph 180 of the National Planning Policy Framework '23, Position statement N8 of the 'The Environment Agency's approach to groundwater protection', and policies CS16(6) & DM10 of the Havant Borough Local Plan (Core Strategy) 2011*

Piling [Informative]

*If piling is to be undertaken on this site, the least intrusive noise and vibration method of piling shall be employed at this site which is still capable of meeting the primary objectives of minimising short-term turbidity within the principal aquifer, or any long-term change in the degree of continuity between perched & deeper groundwater bodies. When seeking written consent, the application should be supported by an options appraisal and method statement which includes a reasoned justification for selecting a particular piling method, and which outlines any proposed mitigation methods to be employed to ensure that potential adverse effects (on groundwater, or upon local amenity) are minimised. It is expected that any submission under condition **[X – Piling]** will be decided by the Local Planning Authority following consultation with The Environment Agency, Portsmouth Water and Environmental Health.*

Solution Features

I note that Portsmouth Water support the concept of a watching brief for solution

features. As previously advised, I remain unclear on how this would work in practice for anything other than relatively small features.

I assume that it is anticipated that any features identified via the Watching Brief can be made safe using engineered fill, or can be bypassed through using penetrative methods (e.g. piling) that found in competent strata below. Interpreting stand-off zones as 'avoiding build-over' – I am unclear on how this could be resolved without re-positioning the building, so I would assume that (where stand-off is necessary because features cannot be filled or bypassed-) the applicant anticipates bridging such features using foundation beams on a modified support scheme.

It is implicit that the applicant & Portsmouth Water (and the Environment Agency, which has not made a specific comment-) agree that these reactive options would be feasible (available without material harm to deliverability).

I am aware that Development Management has taken a different approach to similar risks to other developments, but the examples I have in mind are positioned in the north of the borough in a very different part of the aquifer system, with surface expressions identifying large features. Equivalent risks do not necessarily apply at the spring-line, and we might expect any solution features in this part of the aquifer system to be present at shallower depth than those within present the upper catchment. I would concede that the body which might be expected to have the best working knowledge of the principal aquifer system would be Portsmouth Water, so it is reasonable to defer to it's expertise. No objection arises.

Hampshire Fire & Rescue

07/09/23

Description of Works:

HIWFRS understands that the project involves the proposed Portsmouth Water Headquarters building, widened access onto Solent Road and associated access, car parking, landscaping and works.

I confirm that Hampshire & IOW Fire and Rescue Service (HIWFRS) has received your application, dated 30 August 2023. The inspector named above has considered the information provided and has made the following comments:

Building Regulations:

Access for Firefighting Access and facilities for Fire Service Appliances and Firefighters should be in accordance with Approved Document B5 of the current Building Regulations.

Hampshire Act 1983 Section 12 – Access for Fire Service

Access to the proposed site should be in accordance with Hampshire Act 1983 Sect, 12 (Access to buildings within the site will be dealt with as part of the building regulations application at a later stage). Access roads to the site should be in accordance with Approved Document B5 of the current Building Regulations.

Fire and Rescue Services Act 2004

The following recommendations are advisory only and do not form part of any current

legal requirement of this Authority.

Access for High-reach Appliances

High reach appliances currently operated by the HIWFRS exceed the maximum requirements given in Section 17 of the Approved Document B. When considering high rise buildings these variations should be considered as additions and incorporated as follows. Structures such as bridges, which a high-reach appliance may need to cross should have a maximum carrying capacity of 26 tonnes. Where the operation of a high reach vehicle is envisaged, a road or hard standing is required 6m wide. In addition, the road or hard standing needs to be positioned so that its nearer edge is not less than 3m from the face of the building.

Water Supplies

Additional water supplies for firefighting may be necessary. You should contact the Water Management Team, Hampshire & IOW Fire and Rescue Headquarters, Leigh Road, Eastleigh, SO50 9SJ (hydrants@hantsfire.gov.uk) to discuss your proposals.

Fire Protection

HIWFRS would strongly recommend that consideration is given to the installation of an Automatic Water Fire Suppression System (AWFSS) to promote life safety and property protection within the premises.

HIWFRS is fully committed to promoting Fire Protection Systems for both business and domestic premises. Support is offered to assist all in achieving a reduction of loss of life and the impact of fire on the wider community.

Testing of Fire Safety Systems

HIWFRS strongly recommends that, upon commissioning, all fire safety systems are fully justified, fully tested and shown to be working as designed. Thereafter, their effectiveness should be reconfirmed periodically throughout their working lifecycles.

Firefighting and the Environment

Should a serious unsuppressed fire occur on the premises, the water environment may become polluted with 'fire water run-off' that may include foam. The Service will liaise with the Environment Agency at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the building and its contents.

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages.

Hampshire Highways

Further Comments 13/01/25

I-Transport have put the following note together to aid addressing the objections received by the Planning Authority regarding access alternatives.

I trust this information aids with the justification for the suitability of the access and

evidences that prior to submission the applicant had considered alternative options.

The principle of not creating a wholly new access is supported by the Highway Authority and there is no evidence in the design to require movements to the proposed office use to be separated from the medical centre access.

Officer Comment: This additional Highways Statement can be viewed on the Councils Website here: Additional Highways Statement

Final Comprehensive Comments 07/10/24

In response to previous comments raised by the Highway Authority dated 26th Mach 2024 the applicant has submitted a Highways Statement (HS) dated 29th July 2024. The Highway Authority have reviewed the HS and have the following comments to make.

Meeting
A meeting was held with the applicant on the 10 May 2024 to discuss outstanding matters raised by the Highway Authority. The summary provided within table 1.1 of the HS provide an accurate representation of matters discussed.

Stage One Road Safety Audit (RSA1)
The applicant has undertaken a Stage One Road Safety Audit (RSA1) for the proposed site access and active travel improvements along Solent Road. In total the audit raised 5 items. It is agreed that items A.2.2, A.2.3 and A.4.2 can be resolved at the detailed design stage. Items A.2.1 and A.4.1 are agreed to have been appropriately addressed.

Site Access Design and S278 Highway Works
The site access design and proposed active travel improvements on the northern side of Solent Road and at the Brockhampton Lane/Solent Road junction are shown within drawing ITB200083-GA-001 rev C.

In response to previous comments, the shared use provision has been extended to tie in with the shared use path to access the medical centre with a off-slip provided to allow cyclists to rejoin the carriageway. Additionally, at Brockhampton Lane adjacent to the retail park, the junction radius has been altered to provide an appropriate landing area for cyclists before an on/off slip is provided to continue on-carriageway along Solent Road. An on/off slip is also provided to the west of the site access where the shared use path currently terminates. The provision of the off and on-slips overcomes item A.4.1 of the RSA1. Once the full Solent Road improvement scheme is delivered cyclists will be able to remain off-carriageway travelling west for the full length of Solent Road between the Brockhampton Road/Solent Road/Marples Way roundabout. To provide appropriate opportunities for cyclists to access the offices itself, the shared use path has been extended further internally with cyclists to drop on carriageway further within the development.

These amendments integrate the proposed provision with the wider network appropriately with necessary infrastructure to access the routes when approaching on carriageway. The Highway Authority are content that the proposed design incorporates the previous comments raised and the works are agreed in principle. It has been agreed with the applicant that these works (including the site access) will be delivered via a S278 agreement prior to occupation. This should be secured via a s106 obligation.

In response to item A.2.1 of the RSA1, the existing pedestrian refuge crossing along

Brockhampton Lane is to remain to retain the desire line between Solent Retail Park and the Bosmere Medical Centre.

Cycle visibility splays:
Achievable cycle visibility splays at minor arms for both the site access and Brockhampton Lane/Solent Road junction are identified within drawing ITB200083-GA-001 Rev C. For clarity, cycle visibility splays along Solent Road itself had previously been identified and agreed with the Highway Authority within MODE drawing J32-5257-012 Rev A as part of the Transport Assessment V1.1 dated April 2023.

Site Access:
The site access junction and access road has been designed to a 20mph design speed resulting in a visibility splay requirement of 2.4m X 25m. The drawing demonstrates that at the proposed refuge crossing and at the western uncontrolled crossing point visibility can be provided in excess of the requirements. However, at the eastern uncontrolled crossing point, due to third-party land constraints the maximum achievable visibility is 11.0m. Given that the RSA1 has not raised any safety concerns and that speeds are likely to be less than 20mph in this location given the proximity of the raised table and access arrangements, on balance the Highway Authority are minded to accept the reduced visibility in this instance.

Brockhampton Lane/Solent Road junction:
Brockhampton Lane is subject to a 30mph speed limit providing a requirement for visibility splays of 2.4m X 43.0m at all crossing points. It can be demonstrated that the required visibility is achievable at the central refuge island. Whilst the eastern controlled crossing point has only been drawn to 40.0m, it does appear that the required 43.0m can be achieved. Due to third-party land constraints with the retail park, achievable visibility is shown to be constrained on the eastern uncontrolled crossing point at 12.0m. Given that the RSA1 has not raised any safety concerns and that there are likely to be low speed and low flow vehicular movements in this location, the Highway Authority are minded to accept the reduced visibility in this instance. This will be subject to a departure from standard at the S278 stage.

Refuse/Servicing Arrangements – Brockhampton Lane:
In order to upgrade the existing refuge island at the Brockhampton Lane/Solent Road junction to cater for pedestrians and cyclists the size of the junction has been increased. To ensure that the proposed improvements do not hinder the ability of the refuse vehicle to access Brockhampton Lane, swept path analysis has been provided for both the existing and proposed arrangements (drawing ITB200083-GA-002).

The drawings outline that the 11.20m ‘super large’ refuse vehicle currently overruns the footway on the western side of the carriageway when turning in left to Brockhampton Lane from Solent Road east, this is demonstrated as being an existing issue which will not exacerbated by the proposed improvement works. To confirm this, the Highway Authority have engaged with the refuse team at Havant Borough Council directly and it has been confirmed that refuse vehicles access Brockhampton lane from Solent Road west and turn right. Therefore, the proposed improvements will not impact the ability for the refuse vehicle to access Brockhampton Lane.

Ordinary Watercourse Consent (OWC):
The applicant has acknowledged the requirement for OWC given the requirements for the exiting culvert to be extended to facilitate the site access proposals. The S278 agreement will need to be entered into prior to commencement to ensure OWC consent is achieved before the commencement of any development on site.

HGV use:
The applicant has confirmed through direct discussions that HGV use is required for servicing arrangements for the proposed offices. It is therefore understood that limited HGV movements are proposed and therefore no further tracking was required. The applicant is reminded that given the required space for HGVs to manoeuvre on site, all movements should occur outside of operational hours and will be appropriately secured through a planning condition. Additionally, HGV use will be secured for office use only through an appropriate planning condition given the safe and suitable operation of the site access has only been assessed for these limited movements in mind.

Internal Network
Gates:
The applicant has confirmed that the proposed gates into the Portsmouth Water Offices are to remain open during the operational hours of the development. This will therefore reduce the risk of any vehicles blocking back towards both the Bosmere Medical Centre and Solent Road accesses. The operation of the gates is considered acceptable and will be secured through an appropriate planning condition.

Traffic Calming Features:
In order to achieve the proposed design speed of 20mph, the development access road is to include a raised zebra crossing. As agreed with the Highway Authority, the HS confirms that the raised zebra crossing will not exceed a maximum gradient of 1:20. All roads, footways and cycleways associated within the development will be required to be built to national recognised highway design standards.

Section S106 contributions
The applicant has engaged with the Highway Authority to discuss the proportionate contribution to be provided from this site towards the Solent Road corridor sustainable transport improvement works. As set out within the previous formal response, the improvement scheme aims to reduce the private car reliance of this development by encouraging use of sustainable modes to travel to and from the site in accordance with the NPPF and LTP4. Additionally, this scheme will also mitigate the impact of the development traffic on the Solent Road corridor and the Solent Road/Park Road South signalised junction which has already been demonstrated by the applicant to operate over theoretical design capacity within the AM Peak period.

As raised previously, the total cost of the Solent Road improvement scheme as drawn up by the Kingscroft Farm development is costed at £1,435,027 The strategy to agree the proportionate contribution figure towards these improvement works have been discussed and agreed with the applicant directly. The Highway Authority have been mindful that any proportionate contribution needs to appropriately consider the fact that this development is delivering a section of this identified scheme between the site access and Brockhampton Lane via a S278 agreement. It has therefore been agreed with the applicant that a fair and proportionate financial contribution of £476,677.25 will be paid by the applicant towards the provision of this identified improvement scheme along the Solent Road corridor and secured through a S106 agreement.
Officer Comment: *The Land at Kingscroft Farm adjacent to Ridgeway and Marples Way, Havant planning application for 120 dwellings was considered at the Development Management Committee of the 13th March 2025 when it was resolved to Grant Outline Consent subject (amongst other matters) to the completion of the associated S106 Agreement.*

Construction Phase
A CTMP is to be secured through an appropriate planning condition which will appropriately manage all traffic matters including delivery arrangements, construction

movements, delivery timings and consideration of the management and suitability of HGV access during the construction phase.

At the CTMP stage it may be necessary to consider measures such as localised junction widening to accommodate the required movements, phased delivery of the s278 access works or restrictions on the size of vehicles and vehicle movements. This can be secured through the CTMP if considered necessary.

Recommendations
Having regard to the above the Highway Authority provide no objections to this planning application subject to the following conditions and S106 obligations:

Conditions:
• No development shall start on site until a construction method statement has been submitted to and approved in writing by the Planning Authority, which shall include:

a) A programme of and phasing of demolition (if any) and construction work;
b) The provision of long-term facilities for contractor parking;
c) The arrangements for deliveries associated with all construction works;
d) Methods and phasing of construction works;
e) Access and egress for plant and machinery;
f) Protection of pedestrian routes during construction;
g) Location of temporary site buildings, compounds, construction material, and plant storage areas;
h) Details of the methodology for ensuring dirt is not transferred onto the highway from the site (i.e. wheel washers), and onwards mitigation should this fail, such as the employment of mechanical road sweepers, and the subsequent refresh of street lining (as and when required) should this be damaged during the process. Demolition and construction work shall only take place in accordance with the approved method statement.

Reason - In order that the Planning Authority can properly consider the effect of the works on the amenity of the locality and in the interest of Highway Safety

• The approved lines of site splays on drawings ITB200083-GA-001 Rev C, J32-5257-012 Rev A and J32-5257-005 Rev E) shall be kept free of any obstruction exceeding 0.6m in height above the adjacent carriageway.
Reason – In the interest of Highway Safety

• HGV use should be secured to occur outside of the operational hours of the office only and be restricted office use only.
Reason – In the interest of Highway Safety

• the proposed gates into the Portsmouth Water Offices are to remain open during the operational hours of the development
Reason – In the interest of Highway Safety

• In relation to all roads, footways and cycleways to be provided on site the following requirements shall be met:

i) All roads, footways and cycleways, whether to be adopted or otherwise, shall be built to national recognised design construction standards and completed prior to occupation

j) A verification report by a suitably qualified engineer confirming that all unadopted roads, footways and cycleways have been built to the nationally recognised design construction standards shall be provided to the Local Planning Authority on completion of the final road surface or prior to occupation. The report shall include the relevant construction details that the roads, footways and cycleways have been built to and details of the professional qualifications of the person providing the verification.

Reason: To ensure that the development is provided to an appropriate standard.

S106 Obligations:

• Prior to commencement to enter into a highway agreement or the site access and active travel improvement works as shown indicatively within drawing ITB200083-GA-001 rev C

• Prior to occupation the site access and active travel improvement works to be completed to completion certificate standard

• Prior to commencement payment of a financial contribution of £476,677.25 with respect to walking and cycling improvements along the Solent Road corridor between Harts Farm Way and Park Road South

• Prior to occupation, the full travel plan to be submitted to and agreed in writing with the Highway Authority

• Prior to occupation payment (by developer) of HCC fees in respect of approval (£1,500) and monitoring (£15,000) of the full travel plan

• Prior to occupation, provision of a bond or cash deposit of £14, 300 with respect to measures within the travel plan

Hampshire Biodiversity Information Centre

09/08/21

On site – Notable and Protected Species – Avocet, Bearded Reedling, Euraisian Rock Pipit, Golden Plover, Greenshank, Short-eared Owl, Peregrine, water pipit, Western Marsh Harrier, Common Pipistrelle

On site – Wader and Brent Goose Strategy – Solent Wader and Brent Goose Strategy Site H11

Adjacent – Inland Water

Within 50m – Notable and protected species – Common Pipistrelle, bats

Within 2km – SAC – Solent Maritime

Within 2km – SPA – Chichester and Langstone Harbours

Within 2km – RAMSAR – Chichester and Langstone Harbours

Landscape Team, HBC

Uploaded 08/09/23

From a landscape perspective we have no further comments. Recommend to condition soft landscaping, hard landscaping, material spec and boundary treatments.

Local Lead Flood Authority HCC

14/11/23

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

This response does not reflect the position of Hampshire County Council as the Highway Authority. If there is a potential for the drainage features to be offered for adoption, this will need to be discussed separately with Highways development planning as they might not be considered acceptable by the Highway Authority.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

The County Council has reviewed the following documents relating to the above application:

- Flood Risk Assessment and Drainage Strategy (Ardent, 20/10/23)

The application has been amended so that part of the proposed development has been omitted. Updated drainage details were required to show the reduction in both impermeable area and allowable runoff rate. The calculations have been updated to show this.

The details are otherwise consistent with those considered acceptable by the LLFA previously, with the drainage system comprising attenuation in permeable paving and a tank with a pumped discharge at greenfield runoff rates to a watercourse. Conditions were proposed previously, so are included again here.

We are satisfied with the principles of the development and have no objection but recommend that the following conditions are applied to this application:

1.The drainage system shall be constructed in accordance with the approved documentation. Any changes to the approved documentation must be submitted to and approved in writing by Local Planning Authority and Lead Local Flood Authority. Any revised details submitted for approval must include a technical summary highlighting any changes, updated detailed drainage drawings and detailed drainage calculations.

2.Details for the long-term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include;
a. Maintenance schedules for each drainage feature type and ownership.

b. Details of protection measures.

This response has been provided using the best knowledge and information submitted by the applicant as part of the planning application at the time of responding and is reliant on the accuracy of that information.

National Highways

uploaded 17.03.25

Referring to the consultation on the planning application referenced above, in the vicinity of the A27 and A3(M) that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection;

~~b)recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.1
This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

1 Where relevant, further information will be provided within Annex A.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero

carbon.

Natural England

22.5.25

DESIGNATED HABITATS SITES – NO OBJECTION SUBJECT TO SECURING APPROPRIATE MITIGATION

This advice should be taken as Natural England's formal representation on appropriate assessment given under regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 (as amended). You are entitled to have regard to this representation.

With regard to National Site Network sites, Natural England does not object to the granting of this permission subject to the advice given below.

Your appropriate assessment dated 23 April 2025, concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions.

Your authority has measures in place to manage potential impacts through contributions to an agreed strategic solution which we consider to be ecologically sound. Natural England is of the view that if these measures, including contributions to them, are implemented, they will be effective and reliable in preventing harmful effects on the Habitats Site(s) for the duration of the proposed development. Mitigation measure(s) to offset any positive nutrient budget should be provided within the relevant catchment area(s).

This advice is provided on the basis that all mitigation measures will be secured as planning conditions or obligations by your authority to ensure their strict and timely implementation for the full duration of the development. Your authority should be assured that proposed financial contribution rates are proportionate to the identified effects of the proposed development, suitably precautionary, and in line with the Retail Price Index, where relevant.

SPA Functionally linked land

The site is identified in the Solent Waders and Brent Goose Strategy (SWBGS) as a Candidate Site having previously been classified as a Low Use site. The Solent Waders and Brent Goose Strategy aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. Sites which have fewer than three records default to 'Candidate Site', to reflect the lack of evidence surrounding these sites. However, Candidate Sites receive an additional provisional classification which matches the classification they would have received should they have more than three records, for information and clarity in decision making. The site is therefore provisionally classified as Low Use.

Development proposals which are likely to affect Candidate Sites may need to undertake survey work, as per the survey methodology in the Solent Waders and Brent Goose Strategy: Guidance on Mitigation and Off-setting Requirement to confirm the site's classification prior to assessing off-setting and mitigation requirements.

Alternatively, it is possible to accept the provisional classification at face value, reflecting the fact that this is the best possible evidence available at present. In such cases, any requirement to mitigate impacts to or loss of a Candidate Site should treat the provisional classification as definitive for the purposes of mitigation and follow the specific mitigation guidance for said classification. We note that the Appropriate Assessment refers to the site as a Low Use site.

All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

The appropriate assessment sets out that a financial contribution will be secured and the contribution will be used at Warblington Farm to fund habitat enhancements. The Appropriate Assessment states that these enhancements will consist of the installation of permanent stock-proof fencing around the boundaries of two fields at Warblington Farm and to ensure that mowing is carried out prior to the wintering season. The fencing will be installed prior to October 2025 and mowing prior to this date will ensure a sward height of c.5cm for the wintering period.

Natural England notes that the site has already been managed as permanent grassland sown with a clover rich permanent grass mix for several years as secured by the Warblington Farm Position Statement and Mitigation Plan for Nutrient Neutral Development (Havant Borough Council August 2020) in order to generate nutrient credits. In order to meet the requirements of the Habitats Regulations, the Council as competent authority should be satisfied that any financial contributions are used for additional habitat enhancements rather than continued baseline management. Provided this is the case then Natural England has no further comments on this aspect.

Further advice on combining environmental payments can be found here Combining environmental payments: biodiversity net gain (BNG) and nutrient mitigation - GOV.UK (www.gov.uk).

Deterioration of the water environment

As Competent Authority it is your responsibility to ensure that you are confident that there is sufficient information to support the values used in any nutrient budget calculation that supports this application, and that any nutrient budget calculation(s) are correct.

Where any bespoke occupancy value has been used within the calculator tool, it is Natural England's view that competent authorities may choose to adopt bespoke calculations for detailed planning applications, if sound evidence is available. These are matters for each competent authority. Natural England's advice is to take a precautionary approach that recognises the uncertainty.

Please note that for any budget that includes use of an onsite Package Treatment Plant (PTP), yourselves as competent authority should be satisfied that any bespoke effluent discharge figure has been suitably evidenced. This could be through using a performance test certificate, via adequate robust real-world monitoring data (minimum 12 months representing typical operation), or if these are not available then through use of the precautionary default figure within the nutrients budget calculator. The planning application should be supported by a PTP monitoring and maintenance plan. Please refer to the Environment Agency for comments on wider environmental

consideration associated with PTPs and any advice in relation to permits.

Where calculations include removal of nutrients through on-site Sustainable Urban Drainage Systems (SuDs) it is essential for your authority to verify that the necessary supporting evidence has been submitted, as that forms the basis for the SuDS calculations. As highlighted in the guidance that accompanies the calculators on Gov.uk, Natural England advises that SuDS calculations should be undertaken in accordance with CIRIA guidance (C808 – Using SuDS to reduce phosphorus in surface water runoff (2022) and/or C815 – Using SuDS to reduce nitrogen in surface water runoff (2023)).

In addition, the SuDS features require management in perpetuity. Your authority must ensure that a robust ongoing management plan is appropriately secured and is enforceable in any planning permission given.

Planning Policy

07.05.25

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.

Portsmouth Water

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Biodiversity

We previously sent detailed information regarding biodiversity and landscape design for the proposed development. We have discussed our comments and recommendations with Portsmouth Water's architects and await changes to the overall landscape and planting details. For example, we noted that there were a number of trees that were proposed within the floodplain area to the north of the proposed office that are within the tree root zone of existing trees. We recommend that these should be removed from the design as they are inappropriate. Once the overall amendments have been made, these will be submitted for re-consultation.
Officer Comment: *A landscaping condition is recommended to secure final details of landscaping, it is noted that the Councils Landscape Team raises no objection.*

Surface Water Drainage

Portsmouth Water are satisfied in principle with the surface water drainage strategy set out within the flood risk assessment and approve to the inclusion of pollution control measures (Class 1 petrol interceptor and filter chambers) within the implementation of appropriate Sustainable Drainage. The Catchment and Environment Team agree drainage by infiltration including soakaways would be inappropriate for this site and support that no soakaways are to be used.

Given the proposed SUDs scheme discharges within SPZ1 of the groundwater catchment into Brockhampton Stream, and this flows into Langstone Harbour (which is designated RAMSAR, Special Protection Area, Special area of Conservation, a Site of Special Scientific Interest, and includes Priority Habitats) it's of high importance we ascertain the SUDs scheme - notably the pollution control mechanisms - shall be designed, maintained and managed appropriately after completion. We are satisfied with the proposed timelines within which SuDS features shall be inspected and maintained set out in Table 6-7: 'Management and Maintenance Strategy' of the updated Flood Risk Assessment.

The Flood Risk Assessment and & Drainage Strategy: 191925-R01 October 2023 has not been updated to reflect the amendment to the outline planning application proposal; removal of the Industrial Park and associated Industrial Units. For example, section 6.31 of the Flood Risk Assessment states 'The Industrial unit's commercial yard and delivery areas are to be protected by Class 1 bypass petrol interceptor. We know that these have been removed from the development so this Strategy should be updated to remove this information.

As mentioned within our previous response dated 31st March 2022, *'we note that the two parking areas for the new Portsmouth Water Head Offices' drainage to the attenuation tank will bypass the petrol interceptor in the Drainage layout. The latest Strategy doesn't include a layout. Nonetheless, We expect the drainage design to be revised such that all cark park drainage flows through a petrol interceptor.'*

Subsequently it is Portsmouth Waters position that a condition is required for surface water drainage, and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 1: Surface Water Drainage

No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.
***Reason** - To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.*

Condition 2: Foul Water Drainage

No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.

The scheme shall also include:
- *details of how the scheme shall be maintained and managed after completion.*
- *details of the sewage pipe work layout and specifications.*

Reason: This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Condition 3: Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

***Reason** - To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.*

Condition 4: Piling and Foundations

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

***Reason**-To ensure that any proposed Piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework, and position statement N8 Physical disturbance of an aquifer in a SPZ1 of the 'The Environment Agency's approach to groundwater protection'.*

Condition 5: Construction and Environmental Management Plan (CEMP).

No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Reason- *Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs*

Supplementary Information

Solution features

We support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Land contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. Elevated concentrations of copper and Nickel have been identified in the groundwater samples, however there is no plausible on site source of Copper and Nickel on the site and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds would be required to ensure these are structurally sound and provide appropriate mitigation.

Further Guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below:

https://developers.portsmouthwater.co.uk/groundwater-protection/

Southern Electric

No comments received.

Southern Water

Final Comments:

28/11/23
The submitted drainage details indicate SuDS to be maintained within private ownership and maintenance.

The comments in our response dated 20 September 2023 remain unchanged and valid for the amended details.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at:
SouthernWaterPlanning@southernwater.co.uk

Further Comments:

20/09/23

Please see the attached extract from Southern Water records showing the approximate position of our existing public foul sewer within the development site. The exact position of the public asset must be determined on site by the applicant in consultation with Southern Water before the layout of the proposed development is finalised.

- The 225 mm diameter gravity sewer requires a clearance of 3 metres on either side of the gravity sewer to protect it from construction works and to allow for future maintenance access.
- No development or tree planting should be carried out within 3 metres of the external edge of the public gravity sewer without consent from Southern Water.
- No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of public or adoptable gravity sewers.
- All existing infrastructure should be protected during the course of construction works.

Please refer to: southernwater.co.uk/media/3011/stand-off-distances.pdf

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains and any such proposed assets in the vicinity of existing planting. Reference should be made to Southern Water's publication “A Guide to Tree Planting near water Mains and Sewers” (southernwater.co.uk/media/3027/ds-tree-planting-guide.pdf) and the Sewerage Sector Guidance (water.org.uk/sewerage-sector-guidance-approved-documents/) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service: developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

water.org.uk/sewerage-sector-guidance-approved-documents/

ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by the Local Planning Authority in consultation with Southern Water.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119). Website:

southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Traffic Management Team

Uploaded 17.08.21

The traffic team would request that if this development is permitted, that a provision is made for a sum of £5000 (plus the costs associated with advertising the proposals and any works) estimated to be a maximum of £7000 in total, to be provided by the developer to be set aside from commencement to allow a TRO to be processed ending 5 years from practical completion of the development, to ensure that any parking from the development does not interfere with the capacity, operation or safety of the local highway network.
Officer Comment: *This consultation response is superseded by HCC Highways comments as they are now responsible transport matters.*

6 Community Involvement

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 39

Number of site notices: 3

Statutory advertisement: Yes

Number of representations received: 710 objections with 748 names.

6.1 A significant number of objections have been received in relation to the proposals and these focus on (amongst other matters):

- Highway impacts
- Highway routing including and impacts through Havant
- Impacts on neighbour amenity
- Flood risk

6.2 The third party representations have been summarised at **ANNEX B**

7 Planning Considerations

7.1 Having regard to the relevant policies of the development plan and all other material considerations it is considered that the main issues arising from this application are:

(i) Principle of development
(ii) The proposed development
(iii) The Business Case
(iv) Impact upon the character and appearance of the area
(v) Impact on Heritage Assets
(vi) Impact upon residential amenity
(vii) Highway matters
(viii) Drainage and flood risk
(xi) Contamination issues
(x) Ecological impacts
(xi) Landscaping/Trees
(xii) Other matters (BREEAM / sustainability)
(xiii) Developer Contributions/S106 Requirements

(i) Principle of development

7.2 The application site is situated within an urban area where further development is considered acceptable subject to the usual development control criteria.

7.3 The site is allocated in the Havant Borough Local Plan (Allocations) 2014 under policy HB2 for employment. The site reference BD14 Solent Road North is shown with a site area of 1.68ha with an indicative employment floorspace of 6,600 sqm. It is noted that the application site area is slightly below this and excludes a small area of land to the

south-west part of the allocation area. HB2 states that:

The floorspace shown for each site is indicative, based on site area, access arrangements and other environmental constraints. Planning permission will be granted provided that detailed proposals:

1. Are broadly consistent with the indicative provision for floorspace.

2. Take account of all site specific development requirements set out in the relevant site profile.

7.4 The Site Reference BD14 confirms that the site *could provide 6,600 square metres of new floorspace and 548 new jobs.* It also states that there is, *Potential to relocate Portsmouth Water Company's existing headquarters.*

7.5 BD14 also sets out constraints, existing transport provision, existing accessibility to local services/facilities and site specific development requirements and these will be considered in the sections below.

7.6 In addition Havant Borough Local Plan (Allocations) 2014 policy HB1 allocates the site of the existing Portsmouth Water Headquarters site (to the north of the application site) with a site area of 3.22ha for residential development with an indicative number of 120 net dwellings.

7.7 The principle of the provision of employment development and in particular the relocation of Portsmouth Water Company's existing headquarters is therefore clearly established in the adopted Havant Borough Local Plan (Allocations) 2014.

(ii) <u>The proposed development</u>

7.8 The proposal relates to the provision of a proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.

7.9 The proposal would replace the existing Portsmouth Water Headquarters building which fronts onto West Street. The agent has commented that:

The proposed development is principally premised on the provision of new, purpose built, offices and water testing labs for PW to replace their dilapidated and inefficient existing office complex to the north. The new offices will be built to a high environmental standard and incorporate measures to improve building energy efficiency.

7.10 The Design and Access Statement (DAS) sets out the Design Development and states:

The proposed development is linked to Portsmouth Water's needs. The strategy in its wider setting includes:

- *Retaining the Brockhampton Springs as a water source.*
- *Retaining part of the existing Portsmouth Water site for operational purposes.*
- *Creating a new facility for Portsmouth Water on the application site to meet their current and forecast needs.*
- *Release land for new uses in line with the local authority's aspirations.*

• *Improve the access to the site from Solent Road.*
• *Respect neighbouring properties.*

7.11 In relation to floor space the DAS sets out the proposed floorspace as follows:

Unit	GEA Ground sq.m	GEA First sq.m	GEA total sq.m
PW OFFICES	1000	988	1988
GRAND TOTAL	**1000**	**988**	**1988**

Officer Comment: *Floorspace references vary slightly in this report and this is primarily a product of external or internal floorspace calculations.*

7.12 It should be noted that the application as originally submitted proposed an additional 4 No. new commercial units in flexible B2/B8/E (g) (iii) which were located to the west of the access road, however these buildings are not now part of the planning application.

7.13 It is noted that the allocation anticipated a significantly larger amount of indicative employment floorspace (6,600sqm), however the Council's Policy Team have confirmed the following:

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.

7.14 The Portsmouth Water HQ would be two storeys in height with a ground floor reception and open plan lab/office space ground floor space, toilets, plant/switch room and staircases, with the first floor open plan floor space, toilets and staircases. The roof plan indicates the provision of PV panels to the southern side.

7.15 The proposals include parking to the east and west of the building which is considered further in part (vii) below. The proposals include cycle parking.

7.16 The development would be accessed from Solent Road via the existing vehicular and pedestrian access which serves Bosmere Medical Practice and Pharmacy. The access would be widened to highway requirements with a crossing provided across the altered access with central pedestrian island. The access and highway impacts are considered in detail in (vii) below.

(iii) <u>The Business Case</u>

7.17 The Planning Statement sets out that the proposed development is for the provision of new, purpose built, offices and water testing labs for Portsmouth Water to replace their dilapidated and inefficient existing office complex to the north. The new offices would be built to a high environmental standard and incorporate measures to improve building energy efficiency.

7.18 The Planning Statement continues: *Due to a revision of Portsmouth Water's requirements the new proposed HQ is reduced to floorspace of approximately 1,858sqm. This means that the building footprint and required land is significantly less that was originally required when the allocation policy was devised.*

7.19 In relation to employment it is stated that: *Currently Portsmouth Water employ 244 members of staff who are based, or work out of, the Solent Road, Havant site. A maximum 157 work in the main office on a day to day basis, alongside 10 Contractors. 77 employees work away from the office during the day, with only a potential quick visit as necessary, and a further 10 work in workshops which are remaining on the site. The new HQ building will have around 135 fixed workstations and 25 flexible spaces, enough for 160 employees.*

7.20 Portsmouth Water have had their HQ in Havant adjacent to the Brockhampton Springs supplying water from Havant for many years. The proposal would allow the new HQ to remain located in close proximity to Portsmouth Water's other site at Brockhampton Road which would continue to allow for easy and sustainable access between sites as may be required.

7.21 Portsmouth Water are a key employer in Havant and it is recognised that the existing buildings are dated and do not serve the modern needs of the company and are inefficient in terms of sustainability. There are key locational benefits for Portsmouth Water with this site being close to the Springs and other Portsmouth Water facilities. In addition, the relocation of the HQ would support the allocation of the existing site accessed off West Street for residential development of an indicative 120 dwellings under Havant Borough Local Plan (Allocations) 2014 policy HB1 (site H14).

7.22 The proposal is strongly supported in terms of supporting Portsmouth Water in updating and improving their HQ in Havant, retaining key employment within the Borough and helping to release land for a potential residential development.

(iv) Impact upon the character and appearance of the area

7.23 The site is located to the north of Solent Road which links Brockhampton Road and Park Road South. To the West lies Manor Court a residential development and part of Portsmouth Water's Yard and a former Tannery building. To the north of the site are Brockhampton Springs including two open ponds and attractive landscaped areas leading to the existing Portsmouth Water HQ further to the north beyond this area.

7.24 To the east are a small number of residential properties fronting Brockhampton Lane and modern industrial buildings. To the south of the proposed building is The Bosmere Medical Centre and Bosmere Pharmacy.

7.25 The site itself consists of predominately undeveloped grass and scrub land, with a small area of hardstanding forming a long abandoned tennis court located towards the eastern edge of the site. There is an existing water course - Brockhampton Spring to the north and west of the site.

7.26 Whilst the main site is relatively open, there are significant trees to the Solent Road frontage, to part of the west of the site and to the north within the Brockhampton Springs area. There are also trees and hedges to the boundary with the Bosmere Medical Centre and to the east adjacent to the industrial buildings. Impacts on trees are considered further in Part (xi) of this report.

7.27 It is noted that the site bounds Brockhampton Conservation Area to the west, north

and part of the western side, a small area of the site is also within the Conservation Area in the north-east corner. The impacts on the Conservation Area and nearby Listed Buildings are considered in Part (v).

7.28 It is considered that there are two main aspects to consider in relation to the impact of the development on the Character and Appearance of the area:

- The impact of the proposed Building and associated parking and other works;
- The proposed highway works.

The impact of the proposed Building and associated parking and other works;

7.29 The proposed building is proposed to be located to the rear of The Bosmere Medical Centre and would be set back more than 85m from Solent Road. The building would also be set approximately 71m from Brockhampton Lane which runs to the south-east of the site and approximately 71m from the western boundary with Manor Court.

7.30 The proposed building is two storey in height and would have a maximum height of approximately 11.4m. For comparison the industrial units fronting Solent Road to the south of the site range in height from 8 – 9.5m in height, the retail units to the east of Brockhampton Lane are approximately 10.5m (main ridge) to approximately 14m (entrance feature) and the medical buildings have a maximum height of approximately 7.8m. The building would be clad in a combination of Horizontally laid composite wall cladding in Anthracite Dark Grey and Vertically laid composite wall cladding in Seren Gold, finally, there would be vertically laid dark grey cladding to enclose roof plant.

7.31 To the south of the site the existing medical building, frontage trees and open grassed area would be located between the proposed building and Solent Road significantly reducing the visual impact.

7.32 Overall, given the significant set back from public vantage points and the proposed building height and design it is not considered that the building would result in a harmful impact to the character and appearance of the area.

7.33 The proposal results in the provision of significant parking areas to the east and west of the proposed building, in addition the access road would be widened. These changes would significantly alter the existing grassed and scrub appearance of the site. It is therefore important that appropriate landscaping takes place to soften the appearance of the development and this is considered further in Part (xi) of this report. It is again noted that the car parking would be set back from public vantage points.

The proposed highway works

The proposed highway works beyond the site boundary are considered acceptable in relation to their visual impacts. The access proposed is altering and widening an existing access to Solent Road and will represent the most significant change to the site frontage and result in the removal of trees (see part xi), however, altering the existing access would have less visual impact on the Solent Road frontage than a separate access being proposed. In comparison to other recent developments in Solent Road the access would be widened to 9.5m, this compares to the access width to the industrial units opposite of between approximately 6.1m to 10.2m. It should also be recognised that the proposal would result in the development of the site for the purpose allocated.

7.34 The development is considered to result in an acceptable impact on the character and

appearance of the area.

(v) Impact on Heritage Assets

7.35 The main issues to consider in relation to heritage are potential impacts to the settings of Listed Buildings, the Brockhampton Conservation Area and Archaeological requirements. The application has been considered by the Council's Principal Heritage Officer.

Listed Buildings

7.36 The site boundary is located approximately 18m from The Old Manor House a Grade 11 listed building. The Council's Principal Heritage Officer has stated:

The Old Manor House is located to the west of the development site. The site includes the house, along with an enclosed rear garden. The garden boundary and the eastern boundary of the site is separated by a small flatted development – No's 1-6 Manor Court and its associated parking area. The western boundary of the development site includes an established line of mature landscaping so intervisibility between the site and the house is very limited due to this screening. To the north of the building lies the Portsmouth Water Company industrial buildings, including the historic tannery which has historical associations with the house. The setting to the north and west is mainly suburban and residential.

The application is accompanied by a detailed Heritage Statement by L-P Archaeology which assess the significance of the Old Manor House and how the proposal will impact upon that significance.

This concludes that the significance of Old Manor House lies principally in its architectural and historic interest and that the setting does contribute to its significance but mainly with the other historic buildings which lie to the north, rather than with the application site itself. Whilst there will be a change to the setting as a result of the proposed development, it would not be harmful to its significance.

The findings in regard to the Old Manor House are agreed with and it is considered that the impact on the significance of the designated heritage asset would be negligible.

7.37 In relation to legislation, the following needs to be addressed in relation to Listed Buildings:

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Having regard to the advice of the Council's Principal Heritage Officer it is concluded that the impact of the development on the Listed Building is negligible and acceptable.

Brockhampton Conservation Area

7.38 In terms of the impact on the Conservation Area (a small part of which is included in the site area) has also been assessed by the Council's Principal Heritage Officer who has provided the following comments:

Part of the site (the extreme eastern part) falls within the Brockhampton Conservation Area. This is the section of land which links the existing Portsmouth Water site to the properties on Brockhampton Lane, some of which are non-designated heritage assets. This part of the site would include landscaping and the edge of the parking area. The character of the conservation area to the north of the development site is mainly verdant, with mature landscaping around the lake with the more modern office buildings to the north of these.

The heritage statement sets out the character of the conservation area and identifies key buildings within the CA and views in and out of the CA. The main historic buildings associated with the water works are set within the existing Portsmouth Water site and Brockhampton Road. The development site does not fall with their settings and are not visible from the development site.

The statement also concludes that the development within the conservation area boundary, would not be harmful and would not affect any key views in or out of the CA. Again these findings are agreed with and it is considered that the impact on the conservation area would be negligible.

7.39 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

7.39 Having regard to the advice of the Council's Principal Heritage Officer, the proposed development is considered to not detract from the Brockhampton Conservation Area and would preserve the character and appearance of the area.

7.40 The Principal Heritage Officer's consultation response also sets out the wider policy context including the NPPF and Havant Borough Local Plan policies. The development is considered acceptable in relation to Listed Building and Conservation Area impacts in the context of the framework and policies and the Council's Principal Heritage Officer raises no objection to the proposals. Finally, within Brockhampton Lane are a number of buildings of local interest (closest to the site are No. 8 and 14), it is not considered that the proposals would detract from these non-designated heritage assets given their physical separation from the building and the provision of suitable landscaping.

<u>*Archaeology*</u>

7.41 The application has been supported by an Archaeological Evaluation Report which details the assessment of the site including trench investigations taking place on site. The report states in relation to finds:

The only artefactual material recovered was of clearly modern origin, and none of the finds were retained.

The report goes on to conclude:

No significant archaeological remains were found during this evaluation.

Based on these results, further fieldwork is not considered necessary on the site in order to mitigate the impact of the development.

7.42 The County Archaeologist has been consulted in relation to the development and has provided the following comments:

I note that the applicant has submitted the result of an archaeological evaluation which did not find any notable archaeological remains at the site.

I am happy to confirm that in the light of this I would not raise any further archaeological issues

7.43 Overall, the proposals are considered to have an acceptable and limited impact on Heritage Assets.

(vi) Impact upon residential amenity

7.44 With regards to impacts on residential amenities, given the location of the development, the main potential impacts are considered to be to No's 6-26 (even) Brockhampton Lane to the east; and the residential flats within Manor Court No's 1-22 and No.9 The Old Manor House Brockhampton Road to the west.

7.45 The main issues to be considered relate to overlooking, noise / fumes and lighting. In addition, construction phase impacts will need to be considered.

No's 6-26 (even) Brockhampton Lane

7.46 These properties are located to the east and south-east of the site with No's 8-12 (even) abutting the application site. These are two storey dwellings some with rear extensions and include rear (No's 10-12) and side (No.8) windows facing the application site.

Overlooking/overbearing

7.47 In relation to overlooking and privacy, the building's windows will be primarily orientated to the north and south although it is noted that the building is angled such that the eastern part of the building is angled to the south/south-east. At first floor level the eastern elevation has a first floor lobby window, this would primarily face industrial units off Brockhampton Lane, and any angled view to No.8 would be at a distance of approximately 61m and is not considered to result in an unneighbourly impact, significantly exceeding the 20m separation required by the Havant Borough Design Guide SPD 2011 (HBDG) which relates to residential separation distances but is useful guidance. The set off would also prevent any unacceptable overbearing impacts.

7.48 In relation to the angled view to No's.10 and 12 Brockhampton Lane the set off between windows in the proposed building and these properties would be approximately 41m, again significantly exceeding the 20m separation required by the HBDG. In relation to overlooking issues, the proposal is considered to result in an acceptable impact. The set off would also prevent any unacceptable overbearing impacts.

Noise and Fumes

7.49 In relation to noise and fumes, the main impacts are potentially from the use of the building and associated equipment and from vehicular movements and parking.

7.50 Environmental Health have raised no objections to the proposals subject to the imposition of a condition to control noise from potential installation of plant/machinery to the building. It is noted that the submitted details in relation to noise impacts are below background noise levels at the closest receptors. No concerns in relation to fumes have been identified by Environmental Health. A boundary treatment condition is recommended to ensure that suitable treatment is provided and maintained to the boundaries with residential properties to the east and south-east of the site which would help to mitigate the impact of car parking and car lights at ground floor level.

Lighting

7.51 A lighting assessment has been submitted and this shows that lighting would be designed to include spill shields and to minimise any spill beyond the site boundary. No. 8 Brockhampton Lane is the only property shown to be impacted by minimal light spill to the western end of the garden, it is noted that Environmental Health raise no objections in relation to lighting but recommend an informative that should concerns be raised they can be investigated under the relevant nuisance legislation.

Manor Court No's 1-22 and No.9 The Old Manor House Brockhampton Road

7.52 Of these properties it is noted that No's 1-6 Manor Court are located closest to the common boundary with windows facing the site. No's 7-22 Manor Court are set well off the site boundary (approximately 40m) with significant trees between. The Old Manor House is also set off the site boundary (approximately 30m) and has its main windows facing north / south rather than east towards the application site. Given the set offs for No's 7-22 Manor Court and The Old Manor House it is intended to consider the impacts on No's 1-6 Manor Court below.

Overlooking/overbearing

7.53 No's 1-6 Manor Court are aligned such that they would face the open grass area (formerly proposed for industrial buildings now removed from the application). The proposed Office Building would be set approximately 77m from the east facing windows of 1-6 Manor Court. It is also noted that the proposed office is orientated with its main elevations facing north / south and this further reduces any mass and bulk impacts. This separation would prevent any significant impact in terms of overlooking or overbearing.

Noise and Fumes

7.54 The noise assessment confirms that there are not anticipated to be any unacceptable impacts in terms of noise (as detailed above), and a condition is recommended in relation to any potential for additional equipment being provided on the building. No concerns have been raised in relation to fumes by Environmental Health in relation to potential impacts.

7.55 It is noted that the road access would be located approximately 77m from the nearest properties, the parking area would be closer at approximately 19m. No concerns have been raised by Environmental Health.

Lighting

7.56 Lighting has been designed to avoid light spill to properties to the west of the site.

Construction Impacts

7.57 It is noted that the construction phase will unfortunately impact neighbouring residents because of the nature of the construction process. These impacts can be reduced by suitable construction management and controls. Environmental Health have recommended a planning condition in relation to the provision of a Construction Environmental Management Plan. This would require measures in relation to the following:

- Public liaison / complaint process
- Liaison with the Council's Pollution Control Team
- Restriction to noisy working hours/days
- Delivery / removal of materials hours/days
- Noise minimisation
- Procedures for emergency deviation from hours
- Site lighting
- Measures to control dust and air-borne pollutants
- No bonfires
- Scheme for recycling/disposing of waste from excavation and construction

7.58 A condition is also recommended by Environmental Health in relation to controls over any piling proposed to ensure the least intrusive noise and vibration methods are employed.

7.59 It is considered that subject to the imposition of appropriate planning conditions the proposed development would result in an acceptable impact on the residential amenities of nearby residents.

(vii) <u>Highway matters</u>

7.60 It is fully recognised that the highways impacts of the development and in particular the proposed shared use of the access to The Bosmere Medical Centre and Bosmere Pharmacy have raised very significant concerns and this is reflected by the number of objections received to the proposed development. The scheme has been subject to very detailed consideration by Hampshire County Council (the Highways Authority) and by Havant Borough Council. This has resulted in protracted consideration of the application and the submission of significant additional highways information. The scheme has also been amended such that it now relates to the provision of a single Portsmouth Water Headquarters Building with a floorspace of approximately 1858sqm and the removal of the previously proposed new employment units (B2/B8/E(g) (iii) use) which were previously proposed to the southern and western part of the site and included an additional 2200sqm of floorspace.

7.61 The main issues in relation to Highway impacts arising from the scheme as amended are considered to be:

1. Planning History
2. Proposed Development, Trip Generation
3. The proposed vehicular and pedestrian access to the site and relationship to The Bosmere Medical Centre and Bosmere Pharmacy use
4. Junction modelling
5. Sustainable Transport Provision / improvements
6. Consideration of alternative vehicular access points
7. Travel Plan
8. Parking

1. Planning History

7.62 In relation to the existing vehicular access to The Bosmere Medical Centre and Bosmere Pharmacy, this was originally granted planning permission under application Ref: 03/61715/001 for the *Erection of a part 2 storey, part single storey building providing a primary medical care centre with associated car parking taking vehicular access from Solent Road.* Planning permission was granted on the 6th October 2006. This was subject to condition 8 in relation to details of all proposed means of vehicular and pedestrian access to the site.

7.63 The details of the access were subsequently amended by planning application 07/61715/004 for *Variation of Condition 8 and relief of Condition 13 of Planning Permission 03/61715/001, to allow modifications to the site entrance construction together with alterations to the permitted width and detailing.* Planning permission was granted on the 16th August 2007.

7.64 This permission provided vehicular access from Solent Road with a width of 5.1m and included a pedestrian pavement to the west of the access and a pedestrian crossing at the northern end of the access so that pedestrians approaching from the west can access the health facilities on the site. It should be noted that cycle and pedestrian access to the health services site is also provided from the east with an island crossing point existing to Brockhampton Lane.

7.65 The existing vehicle and pedestrian access from Solent Road are designed with a turning head which abuts Portsmouth Water land and the current proposals the subject of this application would, whilst significantly altering and widening the existing access, continue to use this existing route to serve the proposed Portsmouth Water Headquarters site.

2. Proposed Development, Trip Generation

Proposed Development:

7.66 The application is accompanied by a detailed Transport Assessment (TA) and this confirms the allocation of the site under allocation policy BD14 for 6,600sqm of new office floorspace and confirms that the site is considered to be *Within walking distance of Havant Bus and Train Stations.* The current proposals are for a considerably reduced office floorspace to be occupied by Portsmouth Water with 1,848sqm of floorspace as part of a re-location from their current HQ (to the north with main access from West Street). Access is proposed to be a shared access with the BMC and Bosmere Pharmacy and the development proposals (this is discussed further under 3. of this section of the report).

Trip Generation

7.67 The TA sets out that multimodal trip generation for the development proposals has been calculated by sourcing AM (08:00-09:00) and PM (17:00-18:00) peak hour period total people trip rates from the TRICS database, then applying mode share data sources to each travel questionnaire data issued to existing PW staff.

7.68 As the site is currently undeveloped all development trips have been considered as new trips on the network. The existing PW premises may remain in-situ until further notice and any subsequent change to the nature of the site will remain subject to a separate planning application considered on its own merits.

7.69 In order to derive a representative mode share for the proposed office use, particularly as the end occupier (Portsmouth Water) is known, staff travel to work data has been acquired from PW for their existing staff as follows:

Mode	Mode Share	Mode	Mode Share
Vehicle Driver	81.3%	Walk	7.8%
Vehicle Passenger	3.1%	Cycle	0.8%
Public Transport	5.4%	Other	1.5%

7.71 The above figures have been used to assess the potential impact on the surrounding highway network. The above figures are based on the percentage of people that drive to work being 81.3%.

7.72 A summary of the weekday AM and PM peak hourly multimodal trip rates is stated in the TA as follows:

Table 5.4 Multi-Modal Trip Generation – Proposed Office

Mode	AM (08:00-09:00) Peak Hour Period			PM (17:00-18:00) Peak Hour Period		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Vehicle Driver	52	4	56	8	50	58
Vehicle Passenger	2	0	2	0	2	2
Public Transport	4	0	4	0	3	3
Walk	5	0	5	1	5	6
Cycle	1	0	1	0	1	1
Other	1	0	1	0	1	1
Total	63	4	67	10	62	72

7.73 The TA states that this demonstrates that the proposed office has the potential to generate a total of 67 two-way people movements during the AM peak period, of which 56 would be vehicular. During the PM peak period, the office use could generate approximately 72 two-way people movements, of which 58 would be vehicular.

7.74 The above approach to assessing peak hour movements has been assessed by HCC as the Highways Authority and is considered appropriate.

7.75 The TA notes that post the Covid pandemic there may be reduced peak hour travel due to increased homeworking. The planning agent has provided information on this as follows:

The latest published trade research on home working patterns post-COVID-19 are presented in an ITC Research Paper, which demonstrates that as of April 2023 some 44% of working adults either worked remotely or with a hybrid arrangement. More recent research in trends on home working suggest this has stayed broadly static since.

As such the movements above are expected to represent a worst case of movements in the peak hours.

3) *The proposed vehicular and pedestrian access to the site and relationship to The Bosmere Medical Centre and Bosmere Pharmacy use*

7.76 The TA sets out the proposals for vehicular access to the site as follows:

The development proposals will be accessed from the existing all movement 'T' junction that currently serves the Bosmere Medical Centre. The proposals will nevertheless upgrade the existing access, whilst suitably retaining access to the medical centre (including a separate footway / cycleway into the eastern side of the medical centre).

It is proposed that the existing 'T' junction will be modified to provide an overall wider arrangement, with larger kerb radii along with the provision of a 2.0m wide pedestrian refuge island, dropped kerbs and tactile paving.

Visibility splays of 2.4m x 90m at the site access are also shown……., although no material changes to visibility will be noticed at the site access as part of the proposed changes where visibility is already very clear in either direction.

An independent Stage 1 Road Safety Audit (RSA1) of the proposed changes to the site access has been undertaken.

To the north of the internal access from Solent Road there will be a gated vehicular access to the office accommodation with car parking located to the east and west of the building.

7.77 Hampshire Highways have assessed the suitability of the proposed access and the impacts on the Medical Centre and health facilities as follows:

Access to the site is to remain unchanged following the omission of the industrial unit and is shown within drawing J32-5257-005 Rev E. As previously requested, the highway boundary has been overlayed on this drawing.

For clarity, the existing 'T' junction is to be extended to provide access to the development with the access road widened to accommodate vehicle movements. The existing access is to be modified through a larger kerb radius to accommodate HGV movements and the provision of a 2.0m wide refuge island supported with dropped kerbs and tactile paving. Access to the Bosmere Medical Centre is to remain unchanged. The applicant should widen the refuse island to support cycle movements to not prejudice against the future shared use aspirations along Solent Road.
Officer Comment: This has now been done.

As previously agreed, visibility splays of 2.4m X 90.0m are shown at the site access as shown within drawing J32-5257-005 Rev E, which are in excess of the requirements as laid out within HCC TG3 for a 30mph design speed and demonstrate appropriate visibility is achievable. The Highway Authority are satisfied that achievable visibility would be able to be provided when recorded speeds are required at the detailed design stage.

As requested previously, pedestrian visibility splays at the crossing access point as shown within drawing J32-5237-012 Rev A. These are agreed. Cyclist visibility splays in accordance with HCC TG3 should also be provided. The applicant has been made aware that vegetation maintenance will be required to ensure appropriate visibility can be maintained which was picked up within item 4.2 of the RSA1. Visibility will be suitably conditioned as part of any future planning consent to ensure that obstructions do not exceed 0.6m in height. Annotations have been provided on drawing J32-5257-012 Rev A to state that vegetation maintenance will be required. It is therefore agreed that this

audit item has been resolved.

Whilst the Highway Authority do not have any safety concerns with the access proposals, the applicant has proposed additional measures to ensure that the access arrangement will not compromise the operation of the Bosmere Medical Centre. The TA states that the site layout has been revised to include a stop line on the northern side of the zebra crossing to further raise awareness of the medical centre access on the approach. The Highway Authority raised during direct discussions with the applicant that this arrangement is not supported as it could cause confusion to vehicle users and consequently compromise on highway safety. It is also not a TSRGD complaint use of a stop line. As requested, it appears that this has been removed from drawing 23002-TP-003 Rev L, and consistency should be provided between the drawings submitted and commentary within the TA.

Notwithstanding the above, the Highway Authority support the provision of the 'keep clear' markings to allow those accessing Bosmere Medical Centre a clear path, particularly during the network peak hours.

Officer Comment: Amended plans have been submitted and the Highway Authority state: *The stop line on the northern side of the zebra crossing adjacent to the medical centre has been removed and 'Keep Clear' markings have been provided in its place as shown within drawing J32-5257-PS-016. This is agreed.*

7.78 Gates are shown on the access to the Portsmouth Water site approximately 30.5m beyond the access to the Bosmere Medical Centre. It is important to ensure that the gate would not result in any impact on the operation and access to Medical Centre. The Highways Authority have commented:

The applicant has confirmed that the proposed gates into the Portsmouth Water Offices are to remain open during the operational hours of the development. This will therefore reduce the risk of any vehicles blocking back towards both the Bosmere Medical Centre and Solent Road accesses. The operation of the gates is considered acceptable and will be secured through an appropriate planning condition.

Officer Comment: An appropriate condition is recommended.

7.79 Alterations are proposed to the existing access to the BMC and Pharmacy which would be widened where it meets Solent Road from 5.1m to approximately 9.5m. The width of the road to a position to the north of the access spur into the BMC would also be significantly widened and a pedestrian pavement would be provided to the western side (as existing). Keep Clear marking would be provided on the road adjacent to the BMC access point, this is to prevent possible impacts to the access to the BMC resulting from any queuing of vehicles leaving the site. Moving further north from the crossing the access road would narrow to approximately 7.5m with a pedestrian footpath to both sides.

7.80 The Highway Authority have commented in relation to pedestrian access and routing as follows:

Concerns were raised within the previous response regarding the pedestrian connections into the site from Solent Road and the interaction with the zebra crossing adjacent to the medical centre access. The revised site layout as shown within drawing 23002-TP-003 Rev L shows tactile provision along the footway on the western side of the carriageway upon accessing the zebra crossing point, with the footway on the eastern side to tie in with the existing provision at the medical centre. As requested

previously, this crossing point should be supported by HCC TG3 compliant visibility splays.

Considering the time in which additional information has been submitted to the Highway Authority, HCC TG10 has been released requiring all footways to be 2.0m. The widths of the proposed footways should be confirmed to ensure that these meet the required standards.

Following the removal of the industrial units it is unclear why the footway on the western side of the carriageway extends and leads to nowhere with no further opportunities to cross the access road. The footway should either terminate at the zebra crossing point or extended to tie in with the existing provision within the office car park.

These matters are being checked and it is considered that they can be addressed fully as part of the detailed design process without impacting other land uses.

7.81 In relation to traffic calming features on the access into the site and the BMC the Highway Authority have commented as follows:

In order to achieve the proposed design speed of 20mph, the development access road is to include a raised zebra crossing. As agreed with the Highway Authority, the HS confirms that the raised zebra crossing will not exceed a maximum gradient of 1:20. All roads, footways and cycleways associated within the development will be required to be built to national recognised highway design standards.

7.82 It is fully recognised that detailed concerns have been raised in relation to the shared access proposals by The BMC and patients. The application has been subject to detailed and extensive assessment by the County Highways Authority. This has taken place over a protracted period and has included multiple rounds of consultation, the provision of detailed assessments on behalf of the applicants, amendments and alterations to the proposed access, and the removal of the additional industrial units originally proposed. The design of the shared access has been amended, vehicular movements assessed, the impact on the flow of traffic into the Medical Centre and any impacts from the development considered. In addition, pedestrian and cycle movements and safety have also been assessed and improvements provided.

7.83 The Highway Authority has, subject to recommended conditions and S106 Legal Agreement requirements, confirmed that they have no objections to this planning application in terms of the access arrangements.

4) Junction modelling

7.84 In addition to the site access assessment, consideration of the impact of the development on other junctions has been undertaken. The Highways Authority have provided the following assessments:

The applicant has revised the modelling to include the following TEMPRO growth rates:

	AM Peak (08:00-9:00)	***PM Peak (17:00-18:00)***
2020-2026	*1.0565*	*1.0547*

The scenarios where future year flows were utilised have been revised which are as follows:

• 2026 future year
• 2026 future year + committed development
• 2026 future year + committed development + development

The following junctions which have been modelled…..and their associated maximum RFC values for the 2026 future year + committed development + development scenario are as follows:

Junction	***RFC***
Site Access/Solent Road	*0.22*
Solent Road / Brockhampton Road / Marples Road roundabout	*0.54*
Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout	*0.64*

In theory the junctions can operate within capacity for the 2026 future year + committed development + development scenario. Notwithstanding the above, improvements to be made to encourage sustainable travel and reduce the reliance on the private car are still necessary in order to ensure a genuine choice of modes is available on the corridor.

In relation to the Solent Road/Park Road South signalised junction the Highway Authority comment:

…..the Highway Authority consider that no further modelling of this junction needs to be provided by the applicant. Despite amendments to the cycle time, the modelling results suggest that within the AM Peak period, the Degrees of Saturation exceeds 100% on the Park Road South, Park Road North and Solent Road arm suggesting that the junction is operating over theoretical design capacity.

Given the accident history, proposed private car use from this development, distribution towards the signals and operational capacity of this junction, improvements to the sustainable travel infrastructure along the Solent Road corridor are vital and directly related to the development to mitigate against any additional vehicular trips through this junction. Therefore, a contribution towards the wider Solent Road works in addition to the S278 works being provided is key to offset the vehicular impact on this already constrained junction and provide an opportunity for modal shift.

The S106 Agreement would secure improvements to sustainable travel infrastructure and it is noted that the Highway Authority raise no objections in relation to junction impacts subject to the requirements which would be secured.

5. <u>Sustainable Transport Provision / improvements</u>

7.85 Hampshire Highways have commented on the Transport Assessment which sets out the anticipated modal vehicle journeys stating:

For clarity, the agreed trip rates for the Portsmouth Water offices have been based on the TRICS database in conjunction with Portsmouth Water staff 'Travel to Work' data. It was assumed that due to the locality of the office relocation, staff are to travel to work as per existing arrangements. The modal split of vehicle drivers is 81.3%.

Given the percentage of people (81.3%) that drive to work, it is even more imperative that improvements are made towards the sustainable infrastructure improvements to encourage travel to work via sustainable travel modes and offset the impact of the

additional vehicular trips along the Solent Road corridor network.

7.86 Given this desire to reduce high levels of car travel the Highways Authority have sought to secure improvements to the Solent Road corridor to encourage modal shift to sustainable forms of transport.

7.87 The starting point for any assessment of more sustainable transport options are the existing options available to access the site other than by private vehicle.

Walking and Cycling

7.88 Surrounding the site there is a network of pedestrian and cycle routes along key highway links providing connectivity to local bus stops, Havant and Bedhampton train stations and nearby residential areas.

7.89 The site access design and proposed active travel improvements on the northern side of Solent Road and at the Brockhampton Lane/Solent Road junction are shown within drawing ITB200083-GA-001 rev C. This plan shows improvements to Solent Road, the access to the site and to Brockhampton Lane. The Highway Authority confirm:

Once the full Solent Road improvement scheme is delivered cyclists will be able to remain off-carriageway travelling west for the full length of Solent Road between the Brockhampton Road/Solent Road/Marples Way roundabout. To provide appropriate opportunities for cyclists to access the offices itself, the shared use path has been extended further internally with cyclists to drop on carriageway further within the development.

These amendments integrate the proposed provision with the wider network appropriately with necessary infrastructure to access the routes when approaching on carriageway. The Highway Authority are content that the proposed design incorporates the previous comments raised and the works are agreed in principle. It has been agreed with the applicant that these works (including the site access) will be delivered via a S278 agreement prior to occupation. This should be secured via a s106 obligation.

In response to item A.2.1 of the RSA1, the existing pedestrian refuge crossing along Brockhampton Lane is to remain to retain the desire line between Solent Retail Park and the Bosmere Medical Centre.

7.90 The sustainable highway improvements would be secured through the S106 Agreement requirements.

6. <u>Consideration of Alternative Access Points</u>

7.91 As can be seen from the representations received in relation to the application concerns have been raised relating to the shared use of the improved and widened access with The BMC and the Bosmere Pharmacy. Whilst noting that when considering planning applications it is necessary to consider the application as submitted on its merits (and that in this case the County Highways Authority raise no objections to the proposal), the applicant's planning consultant was nevertheless asked to consider other alternative access options.

7.92 These were considered in an Additional Highways Statement dated 13th January 2025. This confirms that: *…in addition to the preferred and agreed access strategy, various alternative options to deliver access directly onto Solent Road were considered….*

These options were for alternative access points further to the west as a separate access rather than a shared access with The Bosmere Medical Centre. Three options were considered. These alternative arrangements and their impacts were considered further in the Additional Highways Statement as follows:

Specific to highway design matters, the alternative access options onto Solent Road would result in:

i An unnecessary creation of access points onto Solent Road, creating additional conflict points directly opposite various existing industrial accesses. This is unnecessary on the basis that the access to the Bosmere Medical Centre can suitably accommodate the proposed development, as demonstrated within the supporting highways material.

ii Impact on an existing ditch present on the northern side of Solent Road. To deliver a new access point would require the culverting of this ditch, or a significant extension provided to the existing culvert at the Bosmere Medical Centre access. This would result in unnecessary engineering works that would also require separate Ordinary Water Course (OWC) consent.

iii A sub-optimal junction arrangement with the introduction of a left-right staggered junction to the Solent Trade Park on the southern side of Solent Road. As per HCC's latest highway design guidance (TG2), left-right staggered junctions are less preferred than right-left staggered junctions2 and the stagger distance to the Solent Trade Park access would be less than 30m, contrary to guidance in HCC's TG2 document, and requiring a Departure from Standard (DfS).

iv Impeded visibility, with the necessary visibility splays from the junction entering the existing Bosmere Medical Centre access junction. This would be contrary to guidance in HCC's TG3 guidance document and would require a DfS.

The Highway Authority have confirmed that: *The principle of not creating a wholly new access is supported by the Highway Authority and there is no evidence in the design to require movements to the proposed office use to be separated from the medical centre access.*

7.93 Furthermore, the Additional Highways Statement identifies other concerns in relation to providing an alternative access to Solent Road as follows:

More widely, the options were also considered across various technical disciplines (including transport, planning, environmental and arboriculture), raising the following additional considerations:

i To deliver either of the stand-alone access options would result in significant tree loss along the southern site frontage onto Solent Road. This would negatively impact the character of the area and result in the loss of valuable trees on the site frontage.

ii The alternative access options would position the access road close to existing residential properties on Brockhampton Road - this would likely result in an increased noise nuisance to those existing residents.

iii Either alternative access option would reduce the extent of soft landscaping that could be delivered at the western site boundary, negatively impacting the scheme.

iv The alternative access options would potentially require land that falls outside of the ownership of the Applicant and would not be deliverable.

The Local Planning Authority accept that points i-iii, above are all relevant planning considerations and that an alternative access point would create additional impacts on the character and appearance of the area, the likely additional loss of TPO'd trees and would increase impacts on residential properties in Manor Court.

7.94 In conclusion, the proposed access strategy is the access strategy submitted for determination, and this must be considered on its own merits. The proposed access strategy has been tested in detail by the Highway Authority. The access strategy has been subject to a Road Safety Audit and has been agreed by Hampshire County Council as the Local Highway Authority. The National Planning Policy Guidance requires that safe and suitable access is provided and this has been demonstrated in relation to the proposed altered shared access.

7. <u>Travel Plan</u>

7.95 The application is supported by a Staff Travel Plan (TP) which seeks to: *…put in place the management tools deemed necessary to enable employees to make informed decisions about their travel to the site, which at the same time minimises the adverse impacts of travel on the environment. This is achieved by setting out a strategy for eliminating barriers that keep employees from making use of sustainable modes*.

Improving the transport choices available to people, rather than focussing on providing for the private car, will lead to a more equitable and sustainable development that provides travel options for all site users, regardless of whether or not they own a car.

7.96 The TP continues in relation to objectives:

The transport principles for the site reflect sustainable objectives which can be summarised under the following headings:

● PW working to promote sustainable and active travel to the site for all staff members working on the site;

● Promote sustainable transport choices for employees and visitors travelling to and from the site;

● Promote accessibility to the site by walking, cycling, public transport and car sharing;

● Increase the awareness of the environmental and social benefits of using alternative modes of transport; and

● For those that do drive, encouraging the use of electric vehicles through provision and ongoing monitoring of charging points.

It is intended that the objectives will be met by identifying and implementing initiatives that provide employees and visitors with a variety of travel choices and in doing so, reduce the need to travel by private car.

7.97 The Travel Plan sets targets for mode shift as follows:

The targets propose a 10% mode shift from single-occupancy car driver trips to

sustainable modes from the baseline over a 5-year period for the office units. Indicative targets are shown in Tables 7.1.

Table 7.1 Mode Share Targets

Target	Indicator	Mode Shift		
		Baseline	Year 3	Year 5
Achieve a 10% decrease in single occupancy vehicle (SOV) trips.	Employee questionnaire surveys	As surveyed (81.3% interim)	-5%	-10%
Achieve an increase in use of public transport modes to offset reduction in SOV use.	Employee questionnaire surveys	As surveyed (5.4% interim)	+2%	+4%
Achieve an increase in walking to offset reduction in SOV use.	Employee questionnaire surveys	As surveyed (7.8% interim)	+1%	+2%
Achieve an increase in cycling to offset reduction in SOV use.	Employee questionnaire surveys	As surveyed (0.8% interim)	+1%	+2%
Achieve an increase in car sharing to offset reduction in SOV use.	Employee questionnaire surveys	As surveyed (3.1% interim)	+1%	+2%

Note: Interim mode share also includes for 1.5% by 'other' travel modes

7.98 The TP sets out measures for promoting walking, cycling, promoting public transport , car sharing and taxis. Car parking will also be managed.

7.99 The Highway Authority have commented:

The Highway Authority have reviewed the revised travel plan and are satisfied that the required amendments have been made. This travel plan is therefore agreed and will be secured through a S106 agreement should this site receive planning consent along with approval and monitoring fee requirements.

The Travel Plan will be monitored by the Highway Authority.

8. Parking

7.100 The proposed layout shows two parking areas to the east and west of the proposed building and a total of 100 parking spaces are shown of which 20 spaces with EV charging capabilities would be provided (20%).

7.101 The proposed use of the building is as E(g) (i) Offices to carry out any operational or administrative functions. The Havant Borough Council Parking Supplementary Planning Document (SPD) July 2016 (partially updated September 2019) sets out parking provision requirements for the Borough. In relation to office uses this sets out that offices require 1 car parking space per 30sqm of floorspace. The total proposed floorspace is 1,858sqm which would require the provision of 62 spaces and therefore car parking exceeds the requirements of the SPD and acceptable provision is provided. In this case it is considered particularly important to avoid potential overspill parking and this is considered to justify the significant level of over provision relative to the standards.

7.102 Six disabled parking spaces are also proposed close to the building and this

exceeds the requirement in the SPD to provide disabled parking at a ratio of 5%.

7.103 In addition, motorcycle parking needs to be provided at a rate of one space per 25 car parking spaces, which would require four such spaces. The site plan shows two areas for Powered Two Wheeler parking provision which would meet the requirements.

7.104 In relation to cycle parking the SPD would require Long Stay Cycle parking at a rate of 1 stand per 150sqm floorspace and Short Stay at a rate of 1 stand per 500 sqm floorspace. This would require 13 long stay and 4 short stay spaces. The TA states that 12 long stay and 4 short stay spaces will be provided, however, the site plan shows 18 spaces in two locations close to the building. A condition is recommended to ensure compliance with the Cycle Parking requirements in the Parking SPD.

Conclusion in relation to Highway Matters

7.105 In conclusion, the proposed trip generation and routing has been modelled based on agreed modelling and with regard to consideration of the existing Portsmouth Water operation and staff. This has shown that Solent Road and the modelled junctions would operate within design capacity taking account of traffic growth whilst it is noted that the Solent Road/Park Road south junction is already over capacity justifying additional sustainable transport improvements.

7.106 The proposed site access and its use to serve the proposed development together with the existing health facilities has been considered in detail. This has resulted in design alterations which would take account of vehicle, cycle and pedestrian access requirements into The Bosmere Medical Centre and the Bosmere Pharmacy. This arrangement is considered to ensure an appropriate design to allow for safe and timely access into the health facilities and to the proposed Portsmouth Water HQ building.

7.107 The development would secure improvements to sustainable transport options along the Solent Road corridor, including financial contributions and the provision of a Travel Plan for staff. Parking is also provided to exceed the Councils Parking Standards.

7.108 Overall it is considered that the development is acceptable in relation to its highway impacts.

(viii) Drainage and flood risk

7.109 The site is partly located within Flood Zones 2 and 3 and is within a future flood zone. In addition the site is adjacent to Bedhampton Springs and there are watercourses to the northern and western sides of the site and along the southern boundary. Brockhampton Stream to the north and west of the site is designated as a main river on the Environment Agency's main river map.

7.110 There are considered to be two aspects to consider in relation to Drainage and Flood risk these are Surface Water and Foul Drainage.

Surface Water

7.111 The application has been submitted with a Flood Risk Assessment and Drainage Strategy. The proposed development is classified as 'less vulnerable' classification in terms of flood risk vulnerability within the NPPF as an office with parking proposal.

7.112 The land is relatively flat but the site falls from approximately 5.9m AOD in the

northeast corner to 4.8m in the southwestern corner. Similarly site levels fall from east to west at a gradient of approximately 1:240.

7.113 The site lies adjacent to a boundary between permeable chalk bedrock and impermeable London Clay Formation to the north. Consequently, several springs are present in the area including the Brockhampton Springs on the Portsmouth Water site which give rise to the two ponds to the north beyond the application site boundary.

7.114 The site has previously undergone a Sequential Test as part of its allocation for development in the Havant Borough Local Plan (Allocations) 2014.

7.115 The application sets out a sustainable drainage strategy which as required by the NPPF includes an allowance of 45% for the effects of climate change. The site area equates to 1.556ha of which approximately 93.6% is currently permeable. The existing run off rates have been calculated during 1 year, 30 year, and 100 year rainfall events.

7.116 In accordance with Planning Practice Guidance, surface water not collected for use must be disposed of in accordance with the following hierarchy:

• into the ground (infiltration);
• to a surface water body;
• to a surface water sewer, highway drain, or another drainage system;
• to a combined sewer.

The ground conditions and high water table mean that infiltration is not possible at the site. As Brockhampton Stream flows along the site boundaries connection to the surface water body has been considered.

7.117 In terms of the proposed sustainable drainage proposals, the following have been incorporated:

- Permeable paving - to provide additional water attenuation and a storage of treatment before discharging into the nearby watercourse.
- Geo-cellular storage attenuation is considered to help reduce flow rates from the Site by providing attenuation storage. A flow control structure (pump) will be required to constrain the rate of water discharged from the tank.
- SUDS - used to improve the quality of surface water discharge offsite if required.

7.118 The SUDS proposed are a combination of lined permeable paving, shallow geo-cellular attenuation tanks and above ground pond features.

7.119 It is proposed to discharge at a maximum rate of 5.4 l/s (equivalent to Qbar) for all storm events (up to and including the 100 year plus a 45% allowance for climate change). This provides betterment to all existing storm events.

7.120 The proposed attenuation provisions would include permeable paving and Geo-cellular attenuation tanks. Water from these features would run from pipes to Brockhampton Stream and the discharge rate would be limited by a pump to 2.3l/s. The storage provisions equate to a total storage volume of 833.66 m3 to restrict the discharge for all storm events (up to and including the 100 year plus a 45% allowance for climate change) to 2.3 l/s.

7.121 In relation to surface water quality, in terms of pollution control the car parking for the Portsmouth Water office building discharges via porous paving prior to connecting

to the new drainage system. The final design of the surface water drainage scheme would be secured by planning condition.

7.122 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. These conditions are recommended.

7.123 In relation to Sequential Test considerations the Council's Policy Team confirm that:

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.

7.124 The Local Lead Flood Authority (LLFA) have confirmed that:

The application has been amended so that part of the proposed development has been omitted. Updated drainage details were required to show the reduction in both impermeable area and allowable runoff rate. The calculations have been updated to show this.

The details are otherwise consistent with those considered acceptable by the LLFA previously, with the drainage system comprising attenuation in permeable paving and a tank with a pumped discharge at greenfield runoff rates to a watercourse.

7.125 In addition, the LLFA have recommended two planning conditions in relation to construction in accordance with the approved details and details of the long-term maintenance arrangements for the surface water drainage system.

Foul Drainage

7.126 In relation to foul drainage, the proposal is for the foul drainage to discharge to a sewer connection point near Solent Road to an existing manhole 1004. The connection will be via gravity subject to confirmation of the invert level of the existing Southern Water sewer; this will be confirmed at the detailed design stage. The proposed peak flow discharge rate is calculated to be 1.137l/s from the site.

7.127 Southern Water have commented that: *Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.*

7.128 Subject to appropriate conditions it is considered that flood risk and drainage issues have been satisfactorily addressed.

(xi) Contamination issues

7.128 The application was submitted with a Geo-Environmental Assessment which has been assessed by the Council's Environmental Control Officer. A condition recommended by Portsmouth Water in relation to unexpected contamination is supported by the Environmental Control Officer.

(x) Ecological impacts

7.129 The application has been submitted with an Ecological Assessment and Ecology Addendum which assessed on site ecological features and this identified the presence of:

- Modified Grassland;
- Hardstanding;
- Scrub;
- Hedgerow;
- Tree Lines, and;
- Stream

7.130 The assessment concludes in relation to these features as follows:

The site is dominated by rough grassland of low intrinsic nature conservation interest.

The hedgerows and adjacent trees and scrub, particularly the more mature trees, are of elevated ecological interest within the context of the site, albeit for the opportunities they provide fauna species rather than any intrinsic nature conservation interest.

New areas of landscape planting will be provided using a diverse range of native species and species of known wildlife value.

A five-metre buffer against development should be provided adjacent to the stream in the north of the site. This buffer zone shall be sown with a diverse native wildflower grassland to improve botanical diversity. Particular protection, especially during the construction phase, should be given to prevent water pollution and is expected to be captured and detailed in a secured Construction Environmental Management Plan (CEMP). Trees, hedgerow and scrub should be retained where possible and new native scrub planted to enhance these boundary features.

The five-metre buffer has been provided.

7.131 The assessment also considered wildlife use of the site with the following considered:

- Bats;
- Badgers;

- Water Vole;
- Hedgehogs;
- Other Mammals;
- Birds;
- Reptiles;
- Amphibians, and;
- Invertebrates

7.132 The assessment concludes as follows on the on site wildlife:

Bats. Three mature trees on the southern and western boundaries of the site are considered to provide low bat roosting potential on account of Ivy coverage. A single tree on the western boundary is considered to have moderate bat roosting potential owing to the presence of woodpecker holes. The trees and scrub and hedgerow at the boundaries of the site are considered to provide good opportunities for foraging and commuting bats.
It is recommended that boundary trees, hedgerow and scrub be protected where possible. Should any work be required to the trees highlighted as of potential bat roosting interest, or should it not be possible to retain these trees, felling would need to follow soft felling methodology. New landscaping should use native species to provide new foraging opportunities for bats. Proposals will include a sensitive lighting scheme that limits light spillage onto site boundaries so as not to discourage bats foraging adjacent to the site.

Badgers. No evidence of Badger was recorded during the survey. The site offers suitable foraging and dispersal opportunities for this species. Due to the isolated nature of the site, no further surveys are considered necessary for Badgers.

Water Vole. The stream adjacent to the north of the site is considered to provide very limited opportunities for Water Vole, although the species is known to be in the vicinity. The stream adjacent to the north of the site will be protected from physical damage and pollution during construction.

Hedgehog. No Hedgehogs were recorded during survey work, but the scrub and tree lines are suitable, and the species is known to be present in the local area. Care and attention to Hedgehogs will be taken in the removal of any potential habitat, particularly during the hibernation season. New native landscaping would offer new potential habitat for small mammals, including Hedgehogs.

Birds. The areas of trees and scrub on site are considered suitable for foraging and nesting birds, and it is expected that an assemblage of common species will be present. No ground nesting birds, waders or Brent Geese were recorded on site during the completed surveys. Any clearance of suitable bird nesting habitats will take place outside the nesting season, or only during this period following checks to confirm absence, to avoid a potential offence under the legislation. New landscaping will include native species with known value for wildlife, such as fruit bearing trees.

Reptiles. No reptiles were recorded during the survey. The rough grassland present on site provides suitable opportunities for these species. Surveys undertaken in 2019 recorded no presence of reptiles. No further work is deemed necessary for this group.

Amphibians. No amphibians were recorded on site during the survey. The ponds to the north of the site provide suitable breeding opportunities. The rough grassland and scrub on site provide opportunities for amphibians during their terrestrial phase. The

negative results of Great Crested Newt eDNA surveys undertaken during 2019 suggest that this species is not present on site. No further surveys are considered necessary for this species.

Invertebrates. Given the habitats present, it is likely a limited assemblage of common invertebrate species would be present within the site. The tree lines on site are considered to be suitable for Stag Beetle. It is recommended that a new wildflower grassland be sown to provide a new habitat for a range of invertebrates. The new grassland should be subject to a beneficial management scheme to benefit a range of invertebrate species. Log piles and loggeries should be incorporated into any landscape proposals, which would benefit a range of saproxylic species such as Stag Beetle.

The majority of the site is considered to be of low ecological value due to the low floral diversity of the modified grassland. Following the recommendations in this report, the important habitats and species on site will be protected and enhanced. It is considered that development of the site would be in accordance with relevant planning policy at the national and local level.

7.133 The assessment confirms that there are no statutory designations of nature conservation value within the site or immediately adjacent to the site. *The site lies approximately 0.9km north of the Chichester and Langstone Harbours SPA and Ramsar. Chichester and Langstone Harbour are designated for their importance to breeding Little Tern and Sandwich Tern, together with their importance for overwintering and migratory waders and wildfowl. The area is also designated as the Solent Maritime SAC and Langstone Harbour SSSI, which are designated primarily for their estuarine habitats, including salt meadows and Spartina saltmarsh.*

7.134 The site is identified as a low use site in the Solent Waders and Brent Goose Strategy. The assessment comments as follows in relation to this issue:

The site is identified as a low use site in the SWBGS, despite there not appearing to be any previous records of use by the qualifying species for the aforementioned designations. As there have been insufficient surveys to seek for the removal of the area from the SWBGS (requiring a high level of survey effort across the winter period for three years), its continued classification must be observed. In accordance with the SWBGS mitigation strategy, the loss of low use sites should be subject to a financial contribution. The strategy details a payment of £35,610 per hectare of low use site losses to allow for suitable mitigation measures to be implemented across a network of non-designated areas to support the designations and qualifying species. The site supports a total of 1.35 ha of H11 and, hence, a financial contribution of £48,073.50 could be secured to mitigate the loss, in line with the principles of the SWBGS.

7.135 The application has been considered by the Council's Ecologist and Natural England. The Council has also carried out a Habitats Regulations Assessment and Appropriate Assessment.

7.136 The Council's Ecologist has commented on the revised proposals stating:

The site layout has materially changed, with the entirety of the western grassland now retained and the new structures confined to the northern end of the site. On that basis, the new layout is preferable to that previously submitted, with more potential for retention and enhancement of grassland habitat. I welcome the supplementary native plantings and the buffering of the watercourse along the northern and western boundaries.

Following the submission of further details the following final comments have been received:

The Ecology Addendum includes further information relating to the proposed wildflower grassland as well as proposed bat and bird box enhancement features. Information provided for the grassland enhancement areas include details of proposed over-sown herbaceous species as well as management prescriptions. These details are sufficient.

Subject to the imposition of a condition securing ecological avoidance, mitigation, compensation and enhancement measures no objection is raised. The condition is recommended to be imposed.

7.137 The Council has conducted a Draft Habitats Regulations Assessment (HRA), including Appropriate Assessment (AA), of the proposed development under Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended). The planning application was then subject to Appropriate Assessment under Regulation 63. The HRA/AA was subject to consultation with Natural England and members will be updated in relation to any response received.

7.138 The HRA Screening Assessment considered the impact on Solent European Sites and concluded that the proposal was likely to lead to a significant effect on European Site integrity due to potential impacts to the Solent European Sites and the species they support via waterborne pollution and the loss of SPA/Ramsar supporting habitat.

7.139 An Appropriate Assessment was then carried out and this concluded as follows:

Waterborne pollution

The submitted Flood Risk Assessment and Drainage Strategy (Ardent, October 2023) details that the proposed drainage system will entail attenuation via permeable paving and a tank with a pumped discharge at greenfield runoff rates to the Brockhampton Stream. This SuDS system will include appropriate screening prior to discharge.

Subject to the imposition of appropriate planning conditions the Environment Agency and Hampshire County Council as Local Lead Flood Authority raise no objection to the proposed development. The long term management and maintenance of surface water drainage systems would be secured through appropriate conditions or S106 Legal Agreement. Conditions are also to be imposed should permission be granted in relation to Construction Environmental Management and Piling.

Previously, the applicant Portsmouth Water has undertaken flood alleviation works within the site to ensure that flood capacity will meet the 1 in 100 years plus climate change scenario. This has been approved by statutory consultees.

Habitat Loss

The direct and functional loss of SPA/Ramsar supporting habitat (SWBGS Site H11) will require mitigation. Based on the SWBGS Guidelines for Mitigation (current at the time

of application), the loss of 1.5 hectares of Low Use supporting habitat equates to a cost of £53,415 (£35,610 x 1.5ha) to be paid by the applicant.

This contribution will be used at Warblington Farm, a site owned by Havant Borough Council. A series of former arable fields at Warblington Farm were converted to permanent grassland in 2021 in order to mitigate the potential impacts of nutrient enrichment within Chichester & Langstone Harbours SPA/Ramsar. The fields are included in the SWBGS Core Site H23E.

Site H23E totals 13.73 Ha of which c.9 Ha has been included within the c.25 Ha Phase 1 of the Warblington Farm Nutrient Mitigation Scheme. The 9 Ha of H23E has been sown with a clover-rich permanent grass mix to ensure habitat suitability during the overwintering bird season. The cessation of arable cropping (which has predominantly been a maize crop and therefore unsuitable for overwintering SPA/Ramsar bird species) and the creation of permanent grassland ensures that suitable habitat is available in each year. The grassland is not however subject to regular mowing to ensure suitable sward height.

Habitat Management
Havant Borough Council is to install permanent stock-proof fencing around the boundaries of two fields at Warblington Farm and to ensure that mowing is carried out prior to the wintering season. The fencing will be installed prior to October 2025 and mowing prior to this date will ensure a sward height of c.5cm for the wintering period.

Fencing will comprise standard post-and-wire 1.15m cattle fencing.

Fencing will allow continued informal public access along the southern edges of the two fields. During high tide periods the adjacent foreshore is inaccessible, and walkers access the fields via the beach ….and use the southern field edges to move along the coastline. It is considered that this regular usage is a deterrent to birds wishing to feed or rest within these fields.

The proposed new fencing will result in the restriction of informal public access to these two fields, thereby resulting in a functional uplift for overwintering bird species. Havant Borough Council is currently drafting a management statement for the proposed works.

The loss of Site H11 can therefore be mitigated by using the appropriate financial contribution to fund the proposed habitat enhancements at Site H23E.

7.140 The consultation response from Natural England dated 22nd May confirms that in relation to Designated Habitats Sites they have no objection subject to securing appropriate mitigation. The detailed comments are included in part 5 of this report.

Natural England comment on the water environment as follows:

Deterioration of the water environment

As Competent Authority it is your responsibility to ensure that you are confident that there is sufficient information to support the values used in any nutrient budget

calculation that supports this application, and that any nutrient budget calculation(s) are correct.

In this case a Nutrient Budget is not considered to be required. The Position Statement and Mitigation Plan for Nutrient Neutral Development January 2024 sets out under the *Development schemes that could be affected* section of this document that:

This matter needs to be addressed by all applications for overnight accommodation including new homes, student accommodation, care homes, tourism attractions and tourist accommodation.

The proposal does not include overnight accommodation.

In relation to Commercial and other non-residential development the Position Statement sets out that:

Non-residential development is unlikely to lead to a significant effect as it would not involve a net increase in population in the catchment. For the purposes of business and commercial development it is considered that anyone living in the catchment also works and uses facilities in the catchment, and therefore wastewater generated can be calculated using the population increase from new homes and other accommodation. This removes the potential for double counting of human wastewater arising from different planning uses.

However, in some cases commercial or non-residential development could have a significant effect due to the type of operation or facilities proposed. In particular, high water use developments would be likely to cause a significant effect. Such schemes would be considered on a case by case basis.

In this case the proposed development is for an office (not for example a high water usage manufacturing process). Whilst Portsmouth Water itself obviously handles very large volumes of water this is already the case through the springs and pump house and would not be impacted by the new HQ building. It is therefore not considered that the proposed development would require the provision of a Nutrient Budget and compensation.

7.141 In conclusion the proposal is considered acceptable as set out in the HRA/AA in relation to impacts on SPA functionally linked land in terms of bird use and impacts on the water environment.

(xi) <u>Landscaping / Trees</u>

7.142 In relation to landscaping the site is currently generally open grassland, with significant trees particularly along the Solent Road frontage, to parts of the west boundary, to the north of the site close to the existing spring ponds, to parts of the east boundary and with hedging including trees around the west and north boundary to the Bosmere Medical Centre.

7.143 In relation to trees the site includes 5 groups of trees subject to Tree Preservation Orders which are located to the Solent Road frontage (four groups) and one to the western boundary. The applicant's Arboricultural Consultant has confirmed:

- that 4 TPO'd trees within group 5 would be felled as a result of the widening of the site access serving the development and the medical services.
- One other TPO'd tree an Ash T30 is also proposed to be felled together with a dead

Silver Birch and Elm subject to TPO's.

- In addition, 6 other trees are proposed to be felled together with a group G8 (Cherry plum and Alder).
- A partial removal of one tree group G14 (Sycamore, ash, hawthorn, Elder, Yew) G8 and G14 are in the north-east of the site is also proposed.
- It is noted that some of the trees to be felled are within the Conservation Area.

7.144 The landscaping plan indicates the provision of an additional 56 trees these include Oak, Field Maple, Hornbeam, Beech, Bird Cherry and other species.

7.145 The Council's Arboriculturalist has commented:

The tree loss for this site is unacceptable in arboricultural terms, and I raise objection, however if permission is given it must be on balance of planning need, include a comprehensive mitigation planting plan and the Arboricultural condition as follows: Condition should permission be recommended:

The development hereby permitted shall only be carried out in accordance with the Arboricultural Impact Appraisal and Preliminary Arboricultural Method Statement (Reference SLR Project No.: 402.064821.00002) and British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations).
***Reason:** To ensure the continuity of amenity value afforded by the trees in question and in accordance with policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.*

This condition is recommended to be imposed.

7.146 The objection is noted and the removal of significant trees is a negative aspect of the proposal. This needs to be weighed in the planning balance of the consideration of this proposal. It is considered that the proposed development brings significant economic benefits to the Borough and is an allocated site for development. The development would also improve the sustainability of the Portsmouth Water HQ building and provide replacement planting and landscaping. Overall, it is considered that the development can be supported subject to Conditions including tree protection and landscaping including new tree planting.

7.147 In relation to wider landscaping, a landscape bank is proposed to the north of the proposed building, extensive tree planting and other planting is proposed around the building and parking area, along the widened access and to the frontage with Solent Road.

7.148 The Council's Landscape Team have raised no objections to the proposed landscaping scheme which is considered acceptable. It is considered important to ensure that final landscaping scheme secures substantial planting to the south of the car park and to the west of the access road to soften the appearance of the development from 1-6 Manor Court and from The Old Manor House to the west.

7.149 Subject to conditions the proposals are considered to result in an appropriate landscaping and tree protection.

(xii) Other Matters (BREEAM / Sustainability)

7.150 In relation to BREEAM, Havant Borough Local Plan (Core Strategy) 2011 policy CS14 (Sustainable Construction and High Quality Design) requires that:

On completion, unless proven to be financially or technically unviable, meets the following standards:

Multi occupation homes and non-residential development over 500sqm – BREEAM standard 'very good'.

7.151 The application is supported by a BREEAM Pre-assessment Report. This shows that the predicted BREEAM score and rating for the proposed office development with a BREEAM rating of 57% (very good) with a requirement of 55% required to meet very good. The proposal is therefore likely to meet the requirements of policy CS14 and conditions are recommended to ensure that this is the case.

7.152 In addition, the application is supported by an Energy and Sustainability Statement this sets out the following:

Energy and carbon savings are to be achieved through passive design and energy efficient design features, such as: energy efficient lighting, sub-metering of relevant areas, upgrading of 'U' values and occupancy sensing in relative areas, as well as the incorporation of renewable energy technologies. It is anticipated that a 4.31% saving in the developments predicted annual energy consumption will be achieved through the incorporation of passive measures and energy efficient design and a 28.68% further reduction will be achieved through the energy contribution by photovoltaic panels totalling a 32.99% energy reduction from the Part L 2021 Baseline.

To reduce the energy demand of the development as well as help to conserve water resources within the local area, it is anticipated that the fit-out works will provide for sanitary fittings which will be water efficient through measures such as dual flush toilets and low flow taps.

The development is located within Solent Road, Havant, and is in proximity to public transport nodes, as well as a range of primary local amenities such as cash points and supermarkets. These features allow for the reduction of car-based travel and transport related pollution.

7.153 The Design and Access Statement confirms the following measures:

The development will incorporate features including:

- *Low air permeability design*
- *High performance insulated cladding and roofing materials*
- *Good levels of natural lighting considering floor plate depth in the offices*
- *Photovoltaic panels*
- *Electric vehicle charging points*
- *Flexibility of use in the design*
- *BREEAM assessed design*

7.154 It is considered that the proposed development incorporates sustainable features which include its location, link to water resources, construction and design, micro generation, BREEAM very good rating and EV charging and meets the requirements of Local Plan (Core Strategy) 2011 policy CS14 and of the NPPF. A condition is recommended to secure EV charging.

(xiii) <u>Developer Contributions/S106 Requirements</u>

7.155 The development would require the completion of a S106 Agreement in order to secure appropriate measures to make the development sustainable and to mitigate potential impacts. These emanate from Consultee responses (for example from the Highway Authority), or from policy requirements.

7.156 The following requirements have been identified:

Highway Obligations HCC:

- *Prior to commencement to enter into a highway agreement or the site access and active travel improvement works as shown indicatively within drawing ITB200083-GA-001 rev C;*

- *Prior to occupation the site access and active travel improvement works to be completed to completion certificate standard;*

- *Prior to commencement payment of a financial contribution of £476,677.25 with respect to walking and cycling improvements along the Solent Road corridor between Harts Farm Way and Park Road South;*

- *Prior to occupation, the full travel plan to be submitted to and agreed in writing with the Highway Authority*

- *Prior to occupation payment (by developer) of HCC fees in respect of approval (£1,500) and monitoring (£15,000) of the full travel plan*

- *Prior to occupation, provision of a bond or cash deposit of £14,300 with respect to measures within the travel plan*

- *HCC Monitoring Fee*

HBC Obligations:

- *Employment and Skills Plan*

- *The direct and functional loss of SPA/Ramsar supporting habitat (SWBGS Site H11) will require mitigation. Based on the SWBGS Guidelines for Mitigation, the loss of 1.5 hectares of Low Use supporting habitat equates to a cost of £53,415 (£35,610 x 1.5ha) to be paid by the applicant.*

- *This contribution will be used at Warblington Farm, to secure appropriate mitigation and supporting habitat.*

Monitoring HBC

- *£914 per non-financial head of term (outside the scope of VAT)*
- *5% of cost per Havant Borough Council financial head of term (outside the scope of VAT)*

8 Conclusion

8.1 In conclusion, the proposal is supported in principle by the site's allocation in the adopted Local Plan (Allocations) 2014 policies HB2 and site reference BD14 for employment development with the potential to relocate Portsmouth Water Company's

existing headquarters. Furthermore, the relocation of the HQ would allow for the potential redevelopment of the existing site on West Street which is allocated for housing under Allocation Plan policy HB1 as site reference H14 for an indicative 120 dwellings.

8.2 The development would provide a modern Headquarters building and retain employment within the Borough and is strongly supported in terms of its economic and employment benefits.

8.3 The proposed Headquarters building and car parking would be set well back from Solent Road and is considered to have an acceptable impact on the character and appearance of the area. In addition, the development has been considered in terms of its impact on the Brockhampton Conservation Area and other historic assets and the proposals preserve these assets.

8.4 Detailed assessments have been made in relation to the impact on neighbouring residential properties and subject to appropriate conditions including during the construction phase the proposals are considered acceptable.

8.5 In relation to highway matters the proposal has been subject to protracted and detailed consideration. The proposal is, subject to detailed conditions and S106 Agreement requirements, considered to have an acceptable impact on the highway network. Improvements to the sustainable transport network would also be secured.

8.6 In terms of the impacts on the Medical Practice and Pharmacy the access would be widened, improved and shared between the proposed development and the medical facilities and this position is considered an appropriate highways approach. The access would meet the detailed requirements of the Highways Authority. Parking for the development would exceed the Council's Parking Standards and would ensure that overspill parking would be avoided. Whilst concerns have been raised by the Medical Practice in relation to parking, there would be no change to the parking allocated for the surgery. The detailed design of the widened access, pedestrian and cycle routes and the conditions and S106 requirements recommended would secure an acceptable development.

8.7 In terms of flood risk and drainage the site is subject to flood risk, however detailed drainage designs including works already installed have been considered in detail by the statutory consultees. The development would, subject to appropriate conditions provide acceptable foul and surface water drainage and be designed to address and suitably mitigate flood risk. Furthermore, contamination risks in particular to the water environment would be controlled by recommended conditions.

8.8 The site is a low use site under the Solent Waders and Brent Goose Strategy and appropriate mitigation is therefore required. This would be secured through the S106 Agreement improving off site habitat for birds. In addition, the proposal includes mitigation and enhancement measures on site and these have been considered by the Council's Ecologist and a condition is recommended to secure these measures.

8.9 The proposal results in the removal of a limited number of trees including TPO'd trees, however these are mainly in the area of the widened access to Solent Road. The scheme mainly retains important trees to the boundaries of the site. The proposal includes additional planting and landscaping. Whilst the removal of significant trees is a negative aspect of the proposal this needs to be balanced in the overall merits of the development. Subject to the imposition of suitable conditions including in relation to tree protection and landscaping the proposals are considered acceptable.

8.10 The proposal would secure appropriate sustainable features including Solar PV, Electric Vehicle Charging, cycle parking and sustainable transport improvements, landscaping, and SUDs. The development would also need to meet BREEAM very good standards in accordance with the adopted Local Plan (Core Strategy) policy CS14.

8.11 The proposal would secure S106 requirements and financial contributions which would make the development acceptable and mitigate potential impacts.

8.12 Overall, the development is considered critical to the business requirements of Portsmouth Water, retaining their Headquarters in the Borough adjacent to the Bedhampton Springs and retaining employment. Following detailed assessment, the development is considered to have an acceptable impact on the area as set out above. The proposal is therefore recommended for planning permission.

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9 RECOMMENDATION:

That the Development Manager be authorised to **GRANT PLANNING PERMISSION** for application APP/21/00601 subject to:

(A) the satisfactory completion of the S106 Agreement as set out in paragraph 7.157 above to secure the necessary requirements arising from this full planning permission (for which authority is given to the Head of Legal Services to complete the S106 Agreement); and

(B) should appropriate mitigation not available at Warblington Farm (as anticipated by the existing Habitats Regulations Assessment / Appropriate Assessment HRA/AA) - subject to the carrying out of a further HRA/AA in consultation with Natural England which finds that there will be no adverse effect on the integrity of protected sites, and subject to consequential amendments as may be required to the S106 Agreement in (A) (with delegated authority to the Development Manager); and

(C) the following conditions (subject to such changes and/or additions that the Development Manager considers necessary to impose prior to the issuing of the decision).

1 The development must be begun not later than three years beginning with the date of this permission.
Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Plans and documents list to follow

Reason: - To ensure provision of a satisfactory development.

3 Notwithstanding the provisions of any Town and Country Planning General Development or Use Classes Order, no part of the Portsmouth Water Headquarters Building on the land shall be used at anytime for any purpose not falling wholly within the scope of Use Class E(g) (i) Offices to carry out any operational or administrative functions in the Schedule of the Town and Country Planning (Use Classes) Order 1987, as amended.
Reason: To accord with the terms of the application and to ensure that the proposed development has an acceptable impact on surrounding residential and health care premises having due regard to policies CS16, DM10 and CS20 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

4 Construction Environmental Management Plan
Prior to the commencement of the development including any site clearance a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority.

The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The following should be added to any CEMP submitted and should be in operation for all phases of the development i.e. demolition, excavation, clearance and construction: The plan shall include, but not be limited to:

a. Procedures for maintaining good public relations including complaint management, public consultation and liaison and site management contact details;

b. Arrangements for liaison with the Council's Pollution Control Team;

c. All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08:00 Hours and 18:00 Hours on Mondays to Fridays and 08:00 and 13:00 Hours on Saturdays and at no time on Sundays and Bank Holidays unless otherwise agreed in writing by the Local Planning Authority;

d. Deliveries to and removal of materials, plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above;

e. Details of measures to be employed to control the emission of noise during the above phases to be provided. BS5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and Part 2: Vibration (BSI, 2014v) provide guidance on the requirements and indicative noise and vibration levels and criteria;

f. Procedures for emergency deviation of the agreed working hours;

g. Measures for controlling the use of site lighting during all phases, whether required for safe working or for security purposes, to ensure no impact on any nearby residential receptors;

h. Control measures for dust and other air-borne pollutants. It should advise as to what measures are to be put in place for the control of any dust that might emanate from the development site. Furthermore the methods of dust control should be in accordance with the guidance as laid out in the BRE Report 456 - Control of Dust from Construction and Demolition activities, and also the IAQM Guidance on the assessment of dust from demolition and construction 2014. It should also be noted that besides the keeping of haul roads damp during dry weather conditions, any areas where tracked excavators, dozers and the like are working, are also be kept damp at all times;

i. No bonfires to take place on the site at any time;

j. A scheme for recycling/disposing of waste resulting from excavation and construction works is to be implemented;

k. Details of proposed measures to be incorporated in order to minimise any potential impacts on the adjacent health related uses during the construction period.

The development shall thereafter be carried out in accordance with the approved details.

Reason: To minimise disturbance to all nearby sensitive receptors and to ensure the amenities of the surrounding occupiers are not unduly impacted upon, during all phases of the development having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

5 No development shall start on site until a construction method statement has been submitted to and approved in writing by the Planning Authority, which shall include:

a) A programme of and phasing of demolition (if any) and construction work;
b) The provision of long-term facilities for contractor parking;
c) The arrangements for deliveries associated with all construction works;
d) Methods and phasing of construction works;
e) Access and egress for plant and machinery;
f) Protection of pedestrian routes during construction;
g) Location of temporary site buildings, compounds, construction material, and plant storage areas;
h) Details of the methodology for ensuring dirt is not transferred onto the highway from the site (i.e. wheel washers), and onwards mitigation should this fail, such as the employment of mechanical road sweepers, and the subsequent refresh of street lining (as and when required) should this be damaged during the process.

Demolition and construction work shall only take place in accordance with the approved method statement.

Reason: In order that the Planning Authority can properly consider the effect of the works on the amenity of the locality and in the interest of Highway Safety and having due regard to policies CS20 and DM11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

6 No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase.

This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs and having due regard to policies CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

7 Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority following the submission of full details. The development shall be carried out in accordance with the approved details.

Reason: To ensure that any proposed Piling or deep foundation using penetrative methods does not harm either groundwater resources or the amenity of nearby residents, in line with paragraphs 187 and 198 of the National Planning Policy Framework, Position statement N8 of the 'The Environment Agency's approach to groundwater protection', and policies CS16(6) & DM10 of the Havant Borough Local Plan (Core Strategy) 2011.

Note/Informative
If piling is to be undertaken on this site, the least intrusive noise and vibration method of piling shall be employed at this site which is still capable of meeting the primary objectives of minimising short-term turbidity within the principal aquifer, or any long-term change in the degree of continuity between perched & deeper groundwater bodies. When seeking written consent, the application should be supported by an options appraisal and method statement which includes a reasoned justification for selecting a particular piling method, and which outlines any proposed mitigation methods to be employed to ensure that potential adverse effects (on groundwater, or upon local amenity) are minimised. It is expected that any submission under condition [10. – Piling] will be decided by the Local Planning Authority following consultation with The Environment Agency, Portsmouth Water and Environmental Health.

8 If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of

water pollution from previously unidentified contamination sources at the development site. This is having due regard to policies CS11 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

9 During the construction period a watching brief shall be implemented for dissolution features/solution features. Both foundations and drainage excavation shall be inspected for the solution feature presence. The risk of dissolution shall be mitigated appropriately (e.g. stand-off zones and/or ground treatment).
Reason: In order to mitigate potential impacts on ground water having due regard to policy DM10 of Havant Borough Local Plan and the National Planning Policy Framework.

10 Prior to the commencement of development, details of the bund construction and their effectiveness in the prevention of pollution, having regard to the potential for lateral mitigation into adjacent ponds, shall be submitted to and approved in writing by the Local Planning Authority. Any improvements required to prevent pollution shall be included in the details. The development shall thereafter be carried out and thereafter maintained in accordance with the approved details.
Reason: To protect the quality of water having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

11 The development hereby permitted shall not commence unless and until full details of the Surface Water Drainage Scheme have been submitted to and approved in writing by the Local Planning Authority in consultation with the Local Lead Flood Authority, the Environment Agency, Portsmouth Water and Southern Water. The Surface Water Drainage shall be based on the information previously submitted, sustainable drainage principles and a comprehensive assessment of the hydrogeological context of the development. The scheme shall thereafter be implemented in accordance with the approved details before the building is first occupied.
Reason: To ensure that the development is suitably drained, for the avoidance of flood risk and to reduce the risk of groundwater pollution having due regard to policies CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.

12 Details for the long-term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first use of the building hereby approved. The submitted details shall include;

a. Maintenance schedules for each drainage feature type and ownership.

b. Details of protection measures.

The development shall thereafter be maintained in accordance with the approved details.

Reason: In the interests of ensuring the long term maintenance and protection

of the surface water drainage system in the interests of avoiding flood risk having due regard to policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

13 No development shall commence unless and until the following details of the proposed Surface Water SuDS scheme have been submitted to and approved in writing by the Local Planning Authority:

- Specifications of the responsibilities of each party for the implementation of the SuDS scheme.
- Specifications of a timetable for implementation.
- The provision of a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The SuDS scheme shall thereafter be provided, managed and maintained in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the satisfactory provision, management and maintenance of the SuDS scheme to ensure that the development is satisfactorily drained to avoid flood risk having due regard to policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

14 No development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed and other details as part of the approved scheme.

The scheme shall also include:

• details of how the scheme shall be maintained and managed after completion.
• details of the sewage pipe work layout and specifications.

Reason: In order to ensure that the foul water is appropriately drained in the interests of preventing flood risk, to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area having due regard to policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework. In accordance with Protect groundwater and prevent groundwater pollution 2024, the applicant must use the highest specification pipework and designs to minimise leakage.

15 The development hereby permitted must not be commenced until such time as a scheme to ensure protection and maintenance of the newly constructed flood bund and flood storage areas has been submitted to, and approved in writing by, the local planning authority.

The scheme shall be fully implemented and subsequently maintained, in accordance with the schemes timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To ensure the structural integrity of the existing flood defences thereby reducing the risk of flooding, and to reduce the risk of flooding to the proposed development and future users.

Environment Agency Note:

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, with details included in the application document "Flood Alleviation Completion Report". These works were carried out to reduce of the risk of flooding to the development and therefore it is important that they are maintained for the lifetime of the development.

16 The approved lines of site splays on drawings ITB200083-GA-001 Rev C, J32-5257-012 Rev A and J32-5257-005 Rev E shall be kept free of any obstruction exceeding 0.6m in height above the adjacent carriageway.
Reason: In the interest of Highway Safety having due regard to policies CS20 and DM11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

17 Heavy Goods Vehicle use should be secured to occur outside of the operational hours of the office only and be restricted office use only.
Reason: In the interest of Highway Safety having due regard to policies CS20 and DM11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

18 The proposed gates into the Portsmouth Water Offices are to remain open during the operational hours of the development
Reason: In the interest of Highway Safety having due regard to policies CS20 and DM11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

19 In relation to all roads, footways and cycleways to be provided on site the following requirements shall be met:

i) All roads, footways and cycleways, whether to be adopted or otherwise, shall be built to national recognised design construction standards and completed prior to occupation

ii) A verification report by a suitably qualified engineer confirming that all unadopted roads, footways and cycleways have been built to the nationally recognised design construction standards shall be provided to the Local Planning Authority on completion of the final road surface or prior to occupation. The report shall include the relevant construction details that the roads, footways and cycleways have been built to and details of the professional qualifications of the person providing the verification.

Reason: To ensure that the development is provided to an appropriate standard having due regard to policies CS20 and DM11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

20 The car parking, servicing and other vehicular access arrangements shown on the approved plans to serve the development hereby permitted shall be made fully available for use prior to the development being first brought into use and shall be retained thereafter for their intended purpose.
Reason: In the interests of highway safety and having due regard to policy DM14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

21 The development hereby permitted shall only be carried out in accordance with the Arboricultural Baseline Report & Impact Assessment including Arboricultural Impact Assessment (Reference: SLR Project No.: 402.064821.00002 3 June 2025 Rev: 03) and British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations).
Reason: To ensure the continuity of amenity value afforded by the trees in question and in accordance with policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.

22 A scheme of hard and soft landscaping, including details of existing trees to be retained and size, species, planting heights, densities and positions of any soft landscaping, shall be submitted to and agreed in writing by the Local Planning Authority prior to commencement of the hereby approved development. All work comprised in the approved scheme of landscaping shall be carried out before the end of the first planting and seeding season following occupation of any part of the buildings or completion of the development, whichever is sooner, or commencement of the use. Any existing tree shown to be retained or trees or shrubs to be planted as part of the approved landscaping scheme which are removed, die, become severely damaged or diseased within five years of the completion of development shall be replaced with trees or shrubs of appropriate size and species in the next planting season.
Reason: In the interests of the character and appearance of the area, and to safeguard the health of existing trees which represent an important amenity feature in accordance with policies CS11, CS16 and DM8 of the Havant Core Strategy (2011) and the National Planning Policy Framework.

23 Development shall proceed in accordance with the ecological avoidance, mitigation, compensation and enhancement measures as detailed in the Ecology Addendum and Plan (Ecology Solutions, Ltd Ref: 11527 September 2023), Ecological Assessment (Ecology Solutions, Ltd 11527.EcoAs.vf June 2023), Habitats Regulations Assessment (Ecology Solutions, 11527.IHRA.vf June 2023) and Biodiversity Net Gain Assessment and Calculations (Ecology Solutions, August 2023) unless otherwise agreed in writing by the Local Planning Authority.
Reason: To provide ecological protection and enhancement in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006, Policy CS 11 of the Havant Borough (Core Strategy) 2011 and the National Planning Policy Framework.

24 No development shall take place until details of existing and finished floor and site levels relative to previously agreed off-site datum point(s) have been submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details.
Reason: In the interests of the character and appearance of the area and having due regard to Policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

Noise from plant and equipment

25 If the eastern side of the proposed office block is leased out in the future, and requires additional air moving plant and equipment to be installed, an additional acoustic assessment to show that the rating level of any plant and / or equipment, fixed or mobile, for use as part of their unit, will be at least 5 dB below the existing background levels, which must be submitted to and approved in writing by the Local Planning Authority. The assessment must be carried out by a suitably qualified acoustic consultant / engineer and be in accordance with BS4142: 2014 Methods for rating and assessing industrial and commercial sound. Background levels have been established at nearest residential receptors, in the TRC Noise Impact Assessment report dated June 2023.
Reason: To ensure the amenities of nearby residential properties are not impacted upon by any external noise levels and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

26 The car parking hereby permitted shall not be brought into use unless and until 20% of the parking spaces are provided with Electric Vehicle (EV) charging points. The EV charging points shall thereafter be maintained in working order.
Reason: To ensure that sustainable parking is provided having due regard to policy CS14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

27 Notwithstanding the submitted details the development hereby permitted shall not be brought into use unless and until revised details of short and long stay cycle parking provision has been submitted to and approved in writing by the Local Planning Authority. The approved cycle parking shall be provided prior to the first use of the building and thereafter maintained.
Reason: In the interests of sustainable transport provision and having due regard to Havant Borough Council Parking SPD 2016, policy DM14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework/.

28 Prior to the commencement on a phase of the development (excluding demolition and temporary works), a Draft Design Stage Assessment demonstrating that the development will achieve at minimum 'Very Good' against the BREEAM Standard, shall be submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
Reason: To ensure the development contributes to sustainable construction in accordance with policy CS4 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

29 Within 6 months of any phase of the development first becoming occupied, written documentary evidence proving that the development has achieved at minimum 'Very Good' against the BREEAM Standard in the form of post construction assessment and certificate as issued by a legitimate BREEAM certification body shall be submitted to the Local Planning Authority for its approval.
Reason: To ensure the development contributes to sustainable construction in accordance with policy CS14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

30 No development hereby permitted shall commence until a specification of the materials to be used for the surfacing of all open parts of the site proposed to be hardsurfaced has been submitted to and approved in writing by the Local Planning Authority. The development hereby permitted shall not be brought into use until the implementation of all such hardsurfacing has been completed in full accordance with that specification.
Reason: In the interests of the amenities of the locality and having due regard to policies CS11, CS16, and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

31 Notwithstanding any description of materials in the application no above ground construction works shall take place until samples and a full specification of the materials to be used externally on the buildings have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the type, colour and texture of the materials. Only the materials so approved shall be used, in accordance with any terms of such approval.
Reason: To ensure the appearance of the development is satisfactory and having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

32 No part of the development shall be first brought into use unless and until details of the type, siting, design and materials to be used in the construction of all means of enclosure including boundaries, screens or retaining walls, have been submitted to and approved in writing by the Local Planning Authority and the approved structures have been erected in accordance with the approved details. The structures shall thereafter be retained.
Reason: To safeguard the amenities of the locality and occupiers/users of neighbouring property and having due regard to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011and the National Planning Policy Framework.

Annexes:

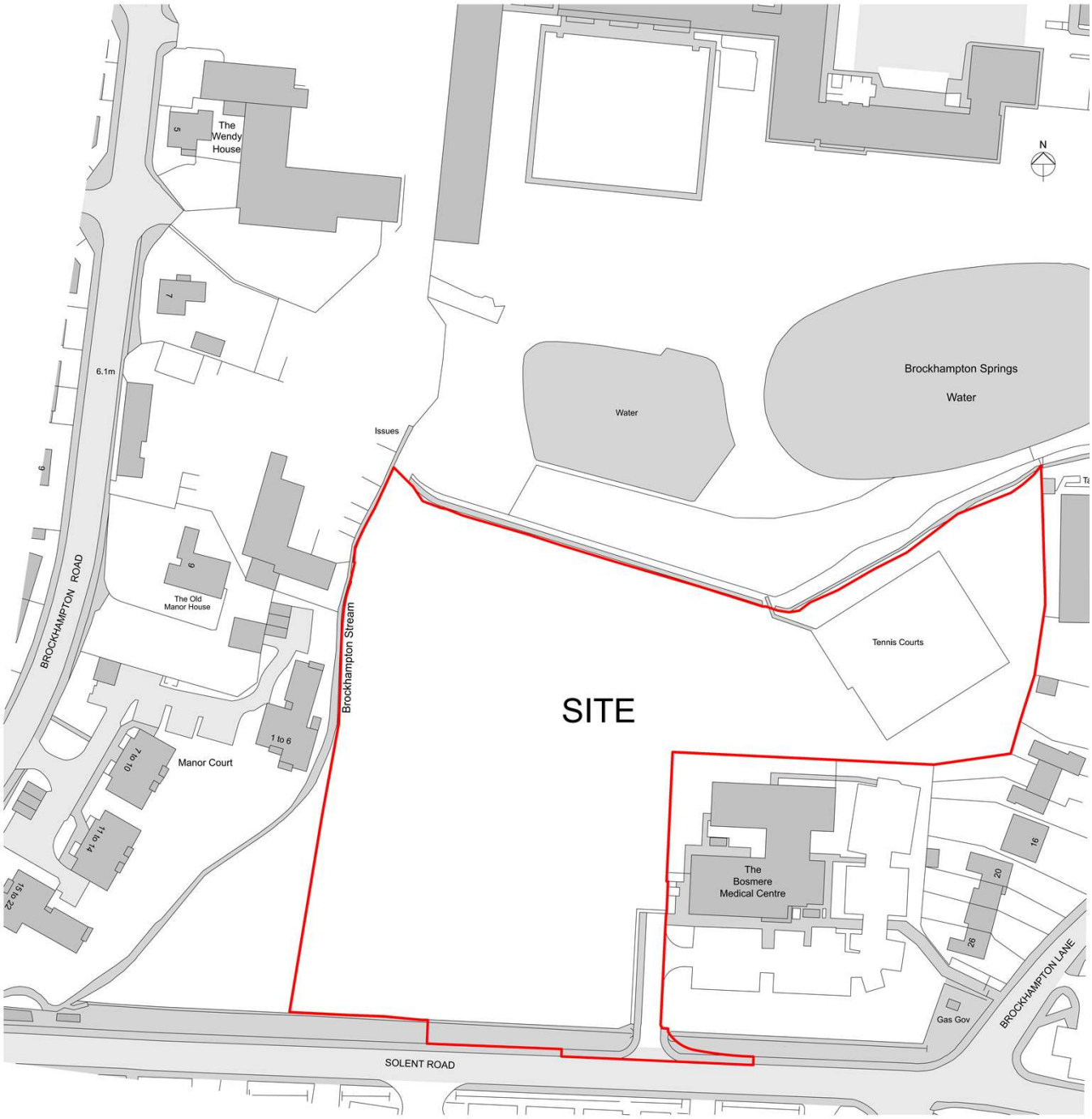
Annex A - Previous Consultation Responses
Annex B – Summary of Third Party Responses

Appendices:

Appendix A – Location Plan
Appendix B – Proposed Site Plan
Appendix C – Office Floor Plans
Appendix D – Office Roof Plans
Appendix E1 – Office Elevation Plans
Appendix E2 – Office Elevation Plans
Appendix F – Site Sections
Appendix G – Proposed Landscaping Plan
Appendix H – Proposed Shared Footway – Cycleway & Crossing Solent Road
Appendix I – Proposed Vehicle Access & Cycle Improvement Scheme

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APPENDIX A **LOCATION PLAN**



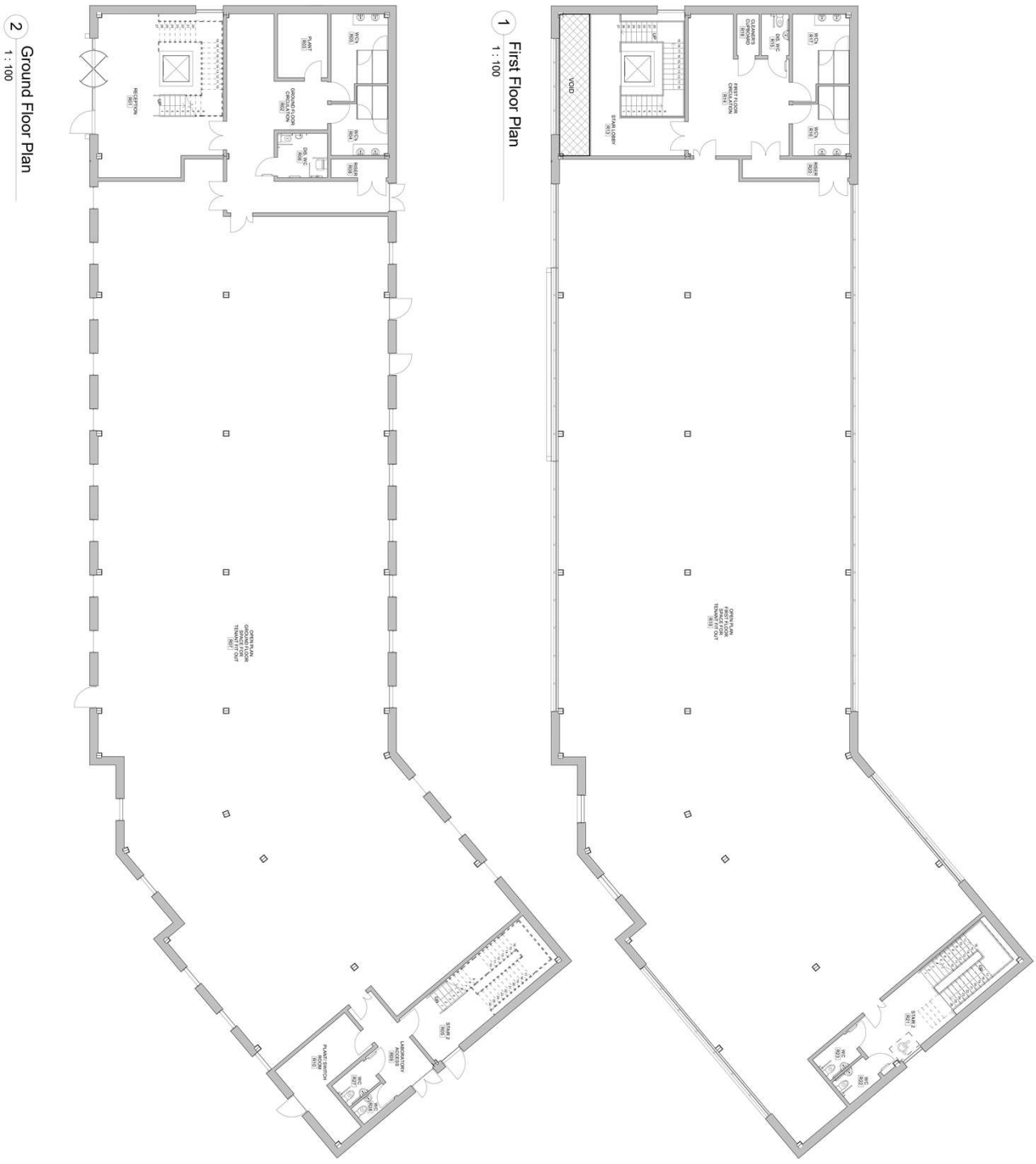
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APPENDIX B **PROPOSED SITE PLAN**



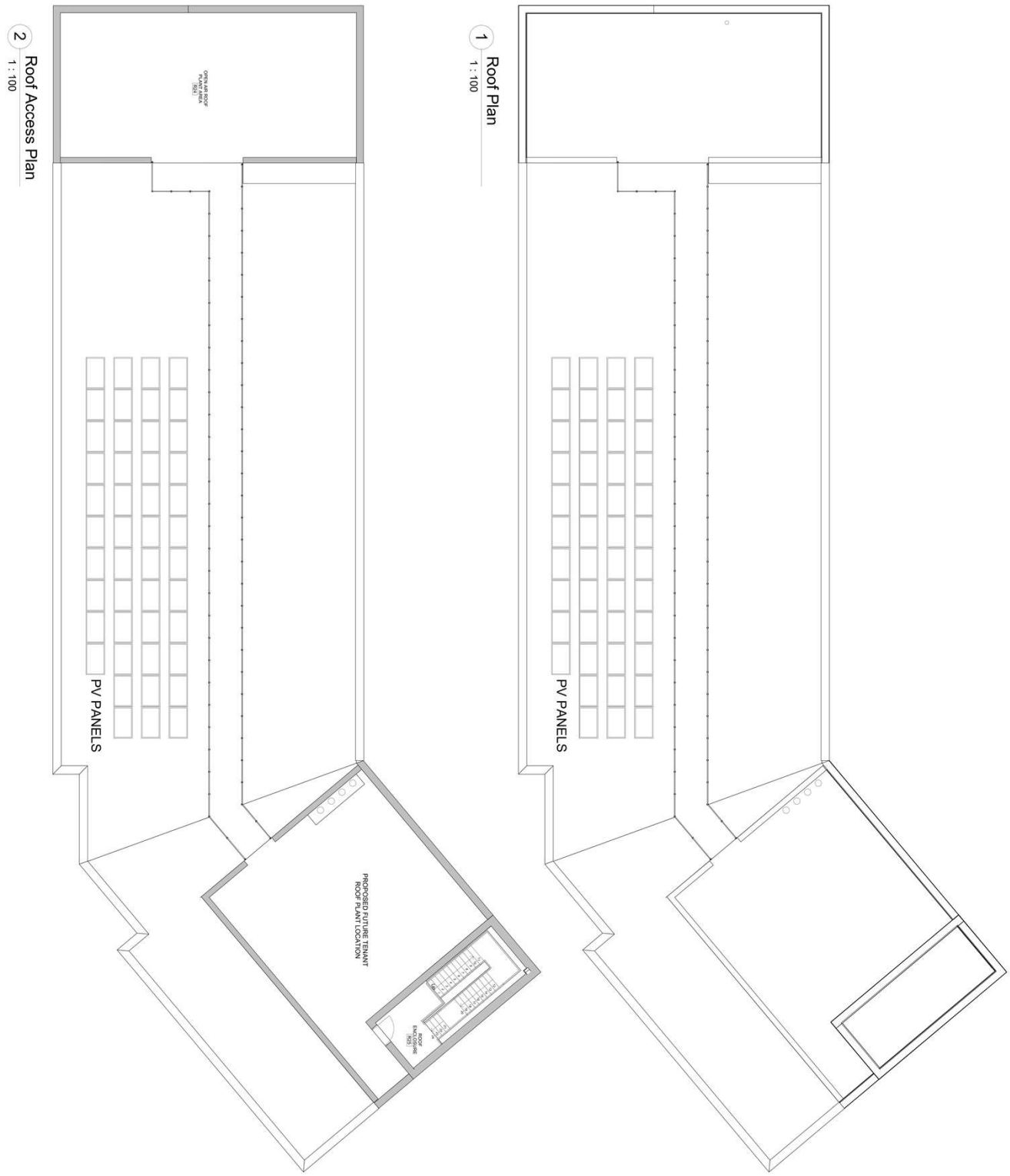
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APPENDIX C **OFFICE FLOOR PLANS**

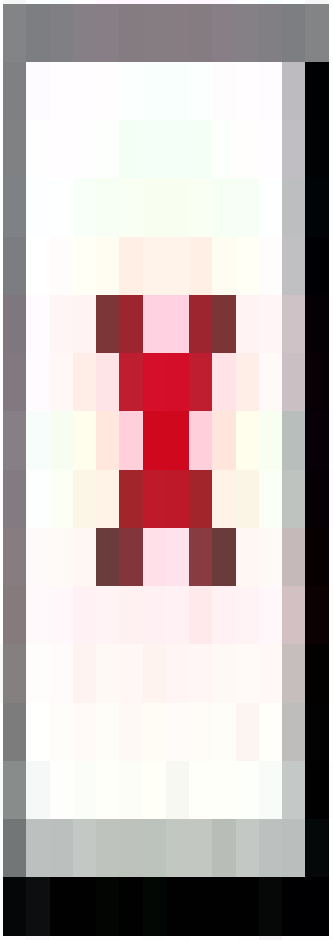


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APPENDIX D **OFFICE ROOF PLANS**

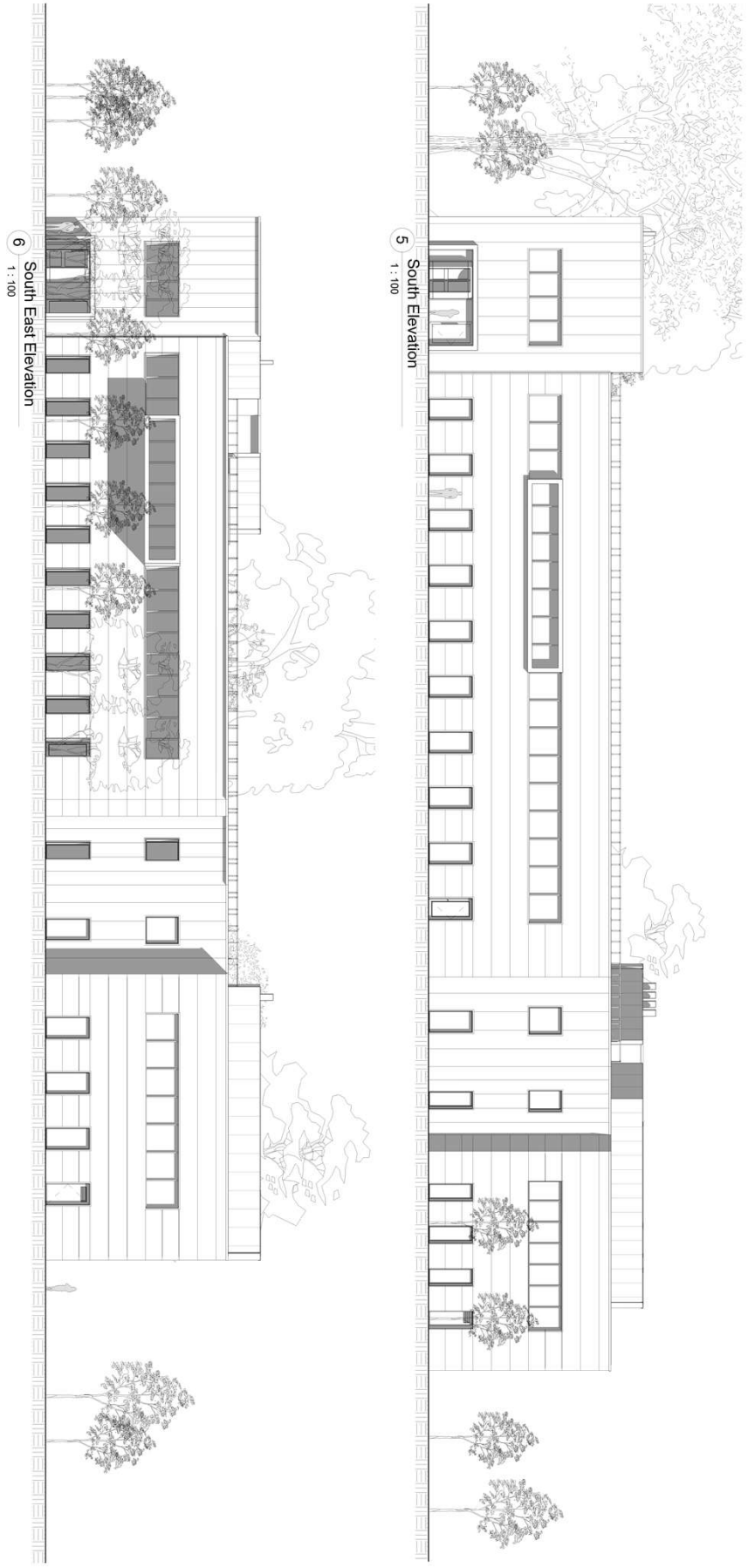


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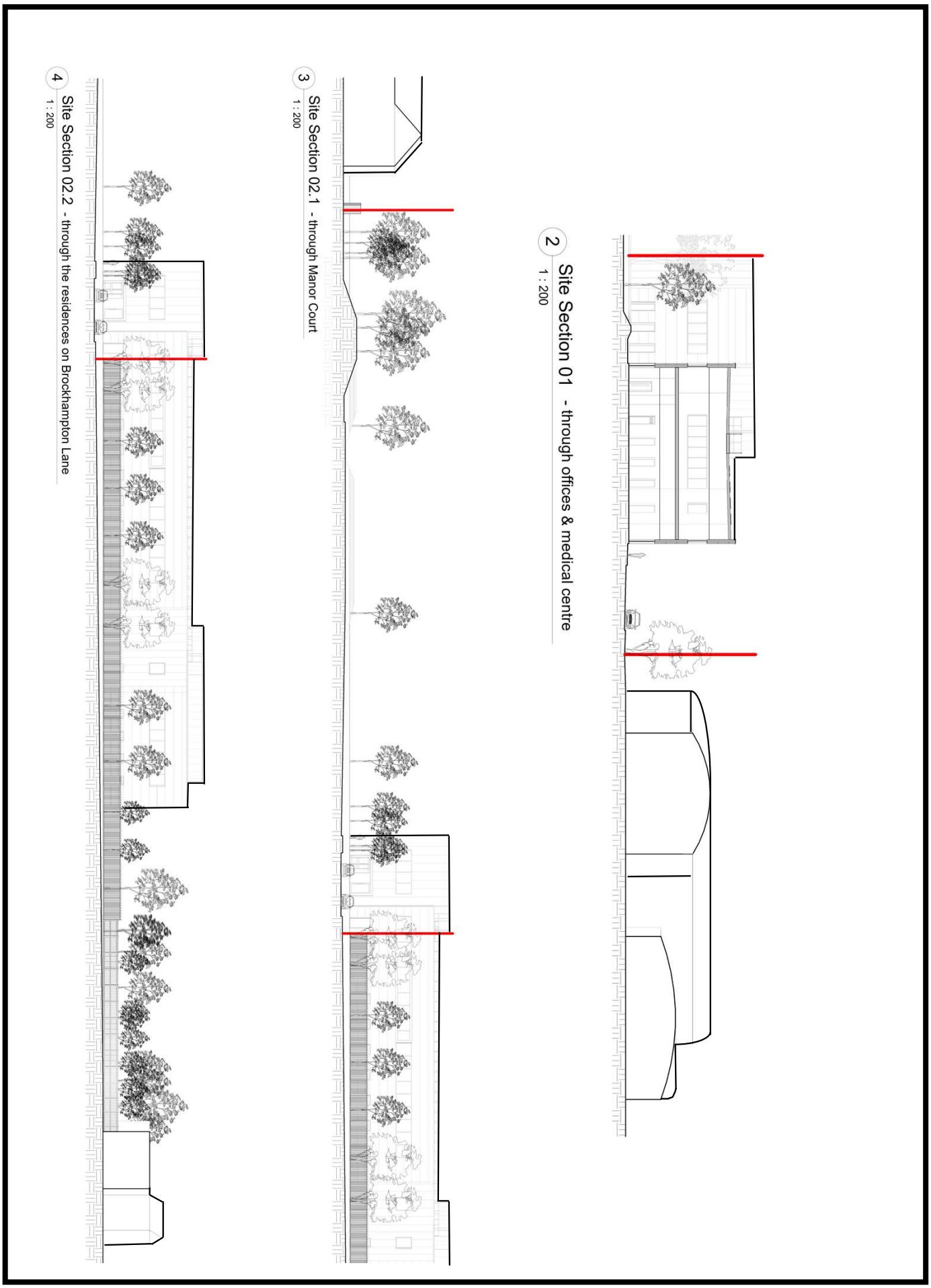
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APPENDIX E2 **OFFICE ELEVATIONS**



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APPENDIX F **SITE SECTIONS**



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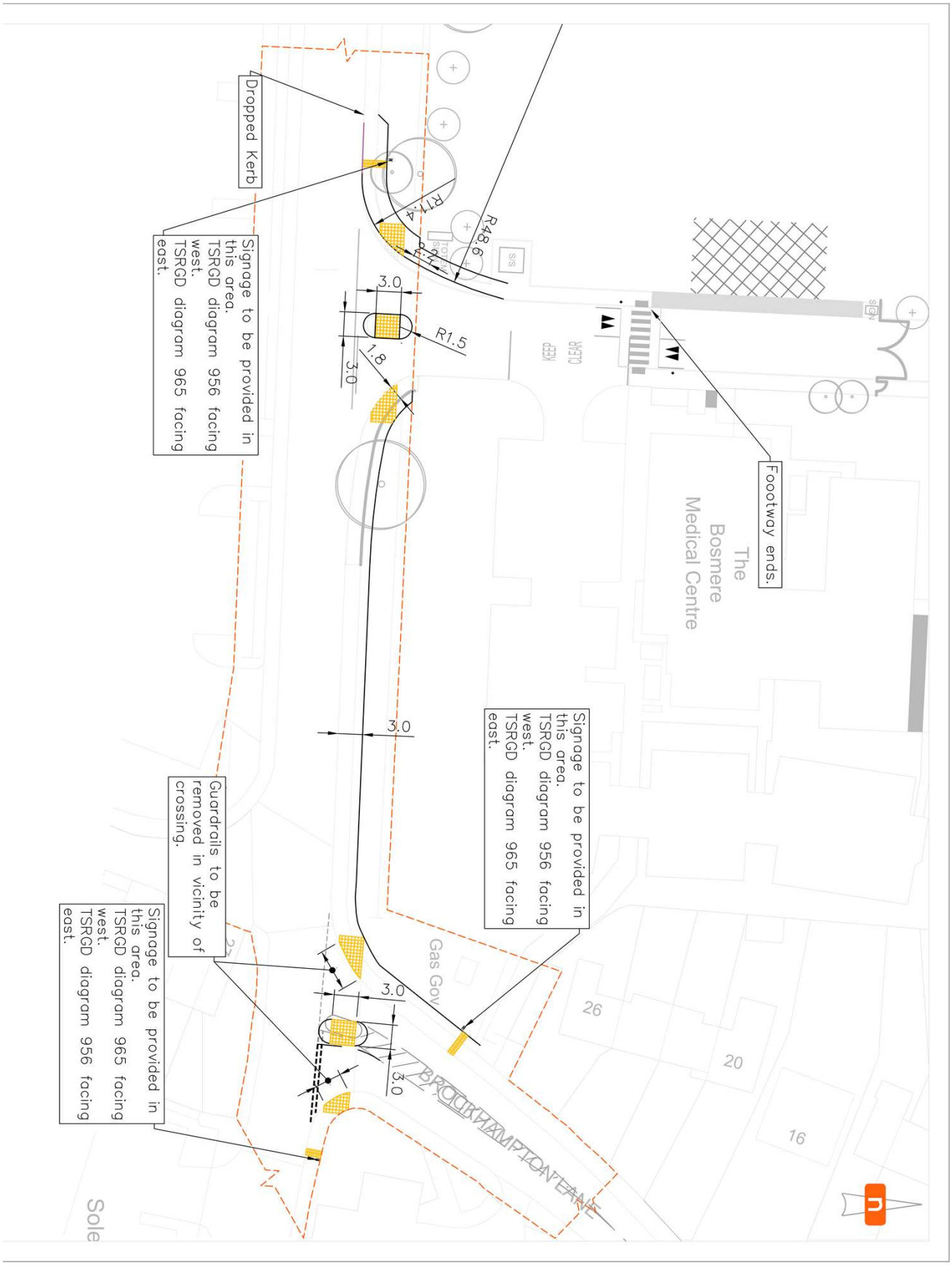
APPENDIX G PROPOSED LANDSCAPING PLAN



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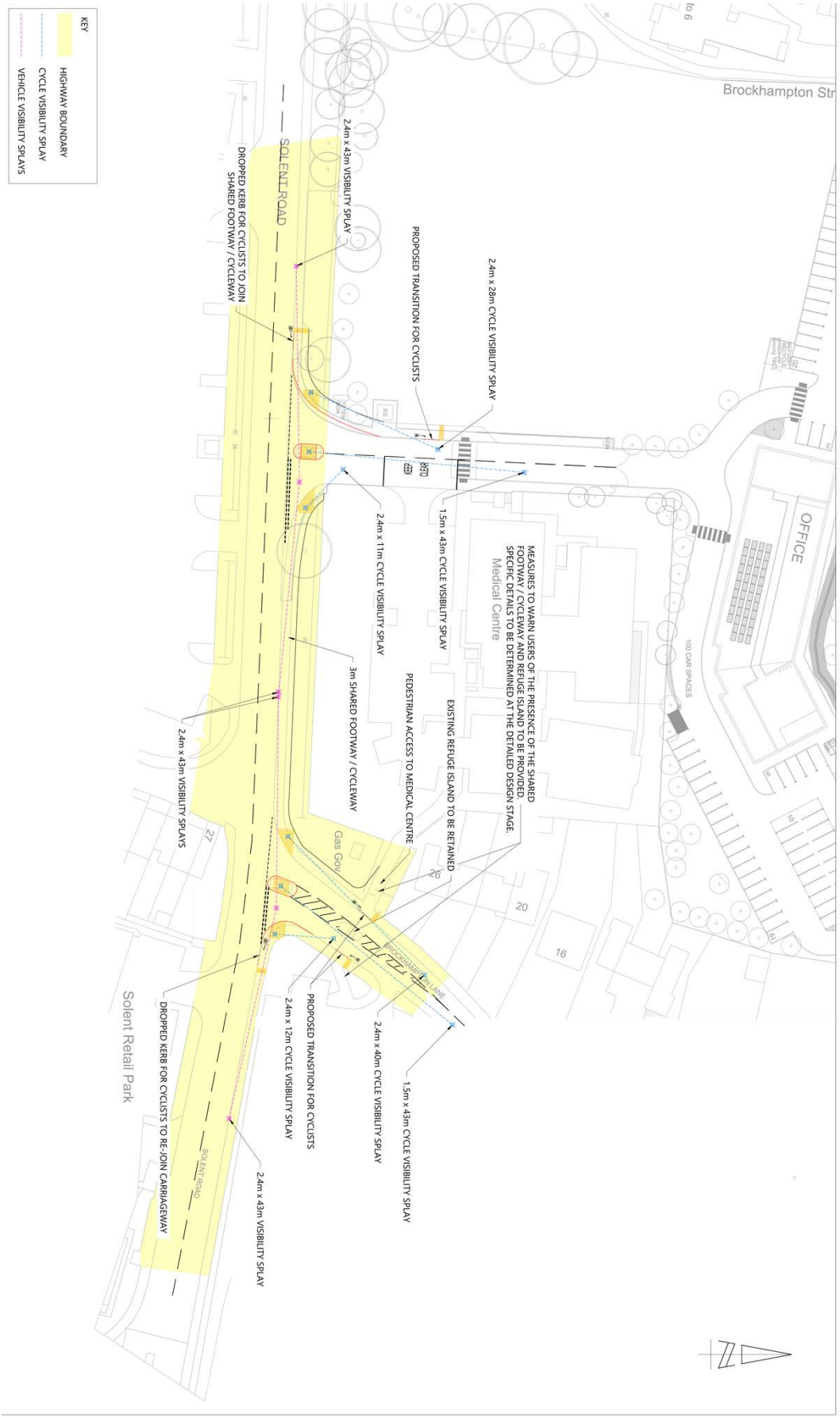
APPENDIX H

PROPOSED SHARED FOOTWAY/CYCLEWAY & CROSSING SOLENT ROAD



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APPENDIX I PROPOSED VEHICLE ACCESS & CYCLE IMPROVEMENT SCHEME



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Annex A

Land North of Solent Road (Adjacent to Bosmere Medical Centre) Havant

Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.

Earlier Consultation Responses:

HCC Arboriculturalist:

Final Comments 19.09.23

Recommendation: Approve, subject to conditions

Reasons for Recommendation
The Council seeks to protect tree coverage in the Borough, sympathetically incorporating existing features into the overall design of the scheme including measures taken to ensure their continued survival.

The development would result in the loss of 11 trees across the site (Landscape Layout 892.10.02 Revision B) and three of these trees are subject to a Tree Preservation Order (TPO 1801 within G5).

Whilst it is disappointing to see the removal of trees on site, especially trees subject to a Tree Preservation Order (TPO), the accompanying Tree Survey (829.TS.01) highlights the poor condition of one of the ash trees subject to the TPO and the general low amenity value of the adjacent horse chestnut and ash on the southern boundary.

The authority would dispute the amenity value attributed to these trees in the Arboricultural Impact Assessment (Issue No.3: 13-04-2023) and Tree Survey (829.TS.01) as they are considered to have a greater positive impact on the local area than suggested, but given the development proposals to retain existing trees along the southern boundary, and the increase of tree planting across the site (83 new trees), which far exceeds the numbers of trees to be removed, the overall impact would be an enhancement of existing tree cover whilst protecting and retaining a significant number of trees on site.

If the officer were minded to grant permission for the application, an updated Tree Protection Plan with an Arboricultural Impact Assessment and Method Statement with details of tree pruning works should be secured by condition prior to commencement.

The Arboricultural Impact Assessment (Issue No.3: 13-04-2023) would need to be updated to provide greater detail of tree protection measures proposed, especially in regard to T22 and T48 (subject to G5 of 1801 TPO) and paragraph 2.1.3 that refers to the removal of a Scots Pine in group 1 or 2 but there is no record of this in the Landscape Layout drawing (892.10.02 Revision B). The Arboricultural Impact Assessment should also reflect the changes to the drainage layout that have been requested by the Local Lead Flood Authority (consultee comment 01.09.2023) and this should then be reflected in paragraph 3.5.2 to understand the potential impact on the adjacent trees. The Arboricultural Impact Assessment also refers to the loss of 13 trees across the site (paragraph 3.6.1) and this should be clarified.

The Landscape Layout (892.10.02 Revision B) identifies a good selection of replacement

trees, but the maintenance of the planting should be increased to 34 visits over 104 weeks and should the officer be minded to grant permission for the application, the Landscape and Maintenance Plan should be secured by condition prior to commencement to allow for replacement planting to be required 5 years post completion of the development. The consideration of larger separation distances of the larger variety of trees (e.g. Quercus robur in Planting Layout South - 892.19.02 Revision B and Planting Layout West 892.29.02 Revision B) could reduce the potential of asymmetric growth in the crowns and increase their amenity value to the area.

The proposed works, subject to the conditions listed below would be in accordance with Policy CS16 and DM8 of the Havant Core Strategy (2011).

Recommended Conditions:

Approval subject to the following conditions;

a) Pruning works:
No development, including site clearance, shall commence on the site until a tree survey detailing proposed tree works in accordance with the recommendations in British Standard BS3998:2010 (Recommendations for Tree work) have been submitted to and approved in writing by the Local Planning Authority.
Reason: To safeguard the continued health and presence of such existing vegetation and protect the amenities of the locality and having due regard to policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.

b) Tree protection measures:
No development, including site clearance, shall commence on the site until a dimensioned tree protection plan in accordance with Section 5.5 and an impact and method statement detailing precautions to minimise damage to trees in accordance with Section 6.1 of British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations) have been submitted to and approved in writing by the Local Planning Authority.
Reason: To safeguard the continued health and presence of such existing vegetation and protect the amenities of the locality and having due regard to policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.

c) Landscaping:
A scheme of hard and soft landscaping, including details of existing trees to be retained and size, species, planting heights, densities and positions of any soft landscaping, shall be submitted to and agreed in writing by the Local Planning Authority prior to commencement of the hereby approved development. All work comprised in the approved scheme of landscaping shall be carried out before the end of the first planting and seeding season following occupation of any part of the buildings or completion of the development, whichever is sooner, or commencement of the use. Any existing tree shown to be retained or trees or shrubs to be planted as part of the approved landscaping scheme which are removed, die, become severely damaged or diseased within five years of the completion of development shall be replaced with trees or shrubs of appropriate size and species in the next planting season.
Reason: To ensure a satisfactory appearance and to safeguard the health of existing tree(s) which represent an important amenity feature in accordance with policies CS16 and DM8 of the Havant Core Strategy (2011) and the National Planning Policy Framework

Further Comments:

Uploaded 10.03.22

My comments remain unchanged from those made on the 25/8/21

Original Comments:

Uploaded 14.09.21

Objection is raised to this proposal due to the proposed loss of 7 trees along the Solent Road frontage. These are mature specimens which, as a group provide amenity value in the street scene and which are also protected by Tree Preservation Order 1801. I have no objection to the removal of trees numbered 16, 15, 14 and one of 12 due to their lack of public amenity value. I also have concerns about the proximity of the FW Sewer diversion to the existing trees and the impact this may have on tree roots.

Building Control

Further Comments:

Uploaded 01.09.23

There is a public sewer running through the site, but not within 3m of the main building. Further details should be provided for the proposed cladding to be used to ensure it has the correct fire resistance (for unprotected area purposes). It should also be noted that the building is located in a Radon class 3 area, and the necessary Radon precautions should be in place.

Further Comments:

26.10.21

Having seen Southern Water consultation comments Building Control have no further comments at this time.

Original Comments

Uploaded 30.07.21

Building Regulation consent will be required for this work

Public Sewer cross the site under A2 unit approx. Consultation with Southern Water Service needed

Compliance with Approved Document B5 Fire Authority access to be considered re road make up.

Community Infrastructure HBC

Original Comments

Uploaded 06.08.21

S106
A S106 is likely given the scale and location of the site.

Heads of Term arising out of Consultee responses including but not limited to:

1. SUDS/SUDS Bond (Bond not necessary if Southern Water have agreed to adopt SUDS once installed)
2. HBC Monitoring Fees*
3. Highway Works (HCC)
4. Travel Plan (HCC)
5. HCC Monitoring Fees

SEE THE HBC DEVELOPER CONTRIBUTIONS GUIDE FOR ADDITIONAL INFORMATION:

Latest version accessible from: https://www.havant.gov.uk/community-infrastructure-levy

*HBC Monitoring Fees: As part of the 'Heads of Terms' it would be necessary to include monitoring fees for any HBC Head of Term. The amended CIL Regulations effective 1/9/19 regularise the collection of S106 monitoring fees. We have an agreed schedule of charges and these are currently outlined in Appendix A:
Officer Comment: Details provided.

Heritage/Conservation HBC

Uploaded 14.09.21

The Site

The site is an open section of land located in Havant, north of Solent Road. It lies to the south of the existing Portsmouth Water premises. To the east is the Bosmere Medical practice building and to the west lies Brockhampton Road. The site is located adjacent to the Brockhampton Conservation Area on two sides, with the far most eastern corner falling within the conservation area boundary. To the west on Brockhampton Road, lies The Old Manor House, a Grade II listed property. There are no existing buildings on the site and it is enclosed by a line of trees on the west.

Legislative and Policy Context

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

National Planning Policy Framework

The revised NPPF (July 2021) sets out in Chapter 16, the core principles relating to development affecting Heritage Assets that local planning authorities should consider in making planning decisions in the following paragraphs:

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be

conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Historic England Advice

In addition to the advice laid out in the NPPF, Historic England has published planning advice in the form of Good Practice Advice Notes (GPA's) and Historic England Advice

Notes (HEANs). Most relevant to this application will be GPA2 – Managing Significance in Decision Taking in the Historic Environment and GPA3 – Setting and Views.

GPA2 states at paragraph 4 - 'The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest'. It also advises that an assessment of significance is required as part of the application process including the understanding of the nature of the significance, the extent of that significance and level of significance. Paragraph 11 states 'to accord with the NPPF, the application will need to undertake an assessment of significance to inform the application process an extent necessary to understand the potential impact (positive or negative) of the proposal and the level of thoroughness proportionate to the relative importance of the asset whose fabric or setting affected'.

GPA3; the Setting of Heritage Assets defines setting as "the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral".

GPA3 advises a broad approach to assessment, undertaken a series of steps that apply proportionately to the complexity of the case, from straightforward to complex;

Step 1 – identify which heritage assets and their settings are affected

Step 2 – Assess the degree to which these settings make a contribution to the significance of the heritage asset or allow significance to be appreciated.

Step 3 – Assess the effects of the proposed development, whether the beneficial or harmful, on that significance or o the ability to appreciate it.

Step 4 – Explore ways to maximise enhancement and avoid or minimise harm.

Step 5 – Make and document the decision and monitor outcomes.

Local Planning Policies

Policy CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) states that planning permission will be granted for development that:

"Protects and where appropriate enhances the borough's statutory and non-statutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest".

Policy CP16 (High Quality Design) (1a) of the Core Strategy states that "Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design:

Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site".

Policy DM20 of the Allocations Plan states that planning permission will be granted for development proposals that conserves and enhances the historic assets of Havant. It also states that application which affect, or have the potential to affect, heritage assets are

expected to provide a Heritage Statement that:

1. Describe the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal.

2. Sets out the impact of the development on the heritage assets and mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets.

Emerging Policy E13 from the Draft Local Plan 2036 provides similar advice to existing Policy CS11, but also adds that where harm cannot be avoided, mitigation may be proportionate to the impact and the significance of the heritage assets and fully incorporated into the development proposals.

Proposal
The proposal is for a new Portsmouth Water HQ's as they are moving from their current site which is north of the application site. The proposal includes 2no. buildings along with parking and landscaping and a widened access.

The employment buildings (made up of smaller units) will mainly have an industrial appearance with metal cladding panels to the exterior and a monopitch roof. The office building will have two wings and would be finished in a difference material of a light gold colour. The parking and landscaping would be arranged around the two building sections.

Assessment

Listed Building – Old Manor House

The site is in close proximity to a Grade II listed heritage asset – The Old Manor House.

The Old Manor House is located to the east of the development site. The site includes the house, along with an enclosed rear garden. The garden boundary and the eastern boundary of the site is separated by a small flatted development – No's 1-6 Manor Court and its associated parking area. The eastern boundary of the development site includes an established line of mature landscaping so intervisibility between the site and the house is very limited due to this screening. To the north of the building lies the Portsmouth water Company industrial buildings, including the historic tannery which has historical associations with the house. The setting to the north and west is mainly suburban and residential.

The application is accompanied by a detailed Heritage Statement by L-P Archaeology which assess the significance of the Old Manor House and how the proposal will impact upon that significance.

This concludes that the significance of Old Manor House lies principally in its architectural and historic interest and that the setting does contribute to its significance but mainly with the other historic buildings which lie to the north, rather that with the application site itself. Whilst there will be a change to the setting as a result of the proposed development, it would not be harmful to its significance.

The findings in regard to the Old Manor House are agreed with and it is considered that the impact on the significance of the designated heritage asset would be negligible.

Brockhampton Conservation Area

Part of the site (the extreme eastern part) falls within the Brockhampton Conservation Area. This is the section of land which links the existing Portsmouth Water site to the properties on Brockhampton Lane, some of which are non-designated heritage assets. This part of the site would include landscaping and the edge of the parking area. The character of the conservation area to the north of the development site is mainly verdant, with mature landscaping around the lake with the more modern office buildings to the north of these.

The heritage statement sets out the character of the conservation area and identifies key buildings within the CA and views in and out of the CA. The main historic buildings associated with the water works are set within the existing Portsmouth water site and Brockhampton Road. The development site does not fall with their settings. and are not visible from the development site

The statement also concludes that the development within the conservation area boundary, would not be harmful and would not affect any key views in or out of the CA.

Again these findings are agreed with and it is considered that the impact on the conservation area would be negligible.

Conclusion

No Objection.

Coastal Engineer HBC

Original Comments

26.08.21

Thank you for consulting with Coastal Partners on the above application, I can confirm we have no objection in principle to the proposed development.

The majority of the site is shown to lie within the Environment Agency's present day Flood Zone 3, however this appears to be fluvial flood risk from Brockhampton Springs. The site does not appear to be at risk from tidal flooding both in the present day or predicted for 2115 (design tide level).

As required by the NPPF for all developments located within present day Flood Zones 2 or 3, or greater than 1.0 hectare, the applicant has submitted a Flood Risk Assessment (FRA) outlining how flood risk at the site will be mitigated.

We recommend the applicant liaises with the Environment Agency to discuss the fluvial flood risk to the site and the modelling undertaken by the applicant.

County Archaeologist

Further Comment:
Email:
I am happy to confirm that in the light of the evaluation results I would not suggest any further archaeological field work or intervention is merited, and I would not raise any further archaeological issues

Further Comments

16/09/21

Thank you for your consultation regarding the amended application documents. I am happy to confirm that my advice set out in my response of 2 August 2021 remains my view.

Original comments:

02.08.21

Thank you for your consultation. I would draw your attention to the archaeological desk based assessment which has been submitted which I would endorse to you. The desk based assessment recognises that the site has a high archaeological potential, that is the potential to encounter archaeological remains which are as yet unrecorded, and concludes that some archaeological mitigation would be appropriate. In its conclusion, para 7.4, it states "It would be reasonable to expect that (Havant's archaeological advisors) may recommend a programme of archaeological investigation to confirm the extent and significance of archaeological remains on site. This would probably be a programme of evaluation by trial trenching initially followed by further works to be determined by the results of the evaluation".

I would concur. I would recommend that a two stage approach be adopted with a preliminary archaeological survey, known as an evaluation, and follow up mitigation based on the results of that survey.

I note that para 6.142 of the planning statement indicates that the evaluation is currently being carried out and a report will be submitted during the determination period. I welcome this. It will be very helpful to have the results of the evaluation available prior to the determination of the planning application in order that both the applicant and the planning authority are satisfied that they understand the implications of any archaeological burdens which might arise.

I look forward to reading the evaluation report in due course and to finalising my consultation advice in the light of that report.

HBC Ecologist

Uploaded 19th September 2023
Further Comments:

The application is accompanied by an amended Ecological Assessment (Ecology Solutions, June 2023), a Habitats Regulations Assessment (Ecology Solutions, June 2023) and a Biodiversity Net Gain Assessment and Calculations (Ecology Solutions, June 2023).

The site layout has materially changed, with the entirety of the western grassland now retained and the new structures confined to the northern end of the site. On that basis, the new layout is preferable to that previously submitted, with more potential for retention and enhancement of grassland habitat. I welcome the supplementary native plantings and the buffering of the watercourse along the northern and western boundaries.

It is unclear how the proposed grassland enhancement will be achieved: the latest ecological submissions contain no details on habitat management. I would therefore welcome some further detail on how the stated biodiversity net gain enhancements to grassland will be implemented – this should include methods, ongoing management and monitoring of habitat condition. The previous ecology report did include some details on this element of proposed works. I would also welcome the addition of nesting/roosting opportunities for bird/bat species on the new structure: the previous layout included such features but the amended plan does not.

After clarification on these matters I would be happy to recommend that all ecological measures are secured by condition.

Further Comments:

25.04.22
The advisory comments in my previous response dated 24 November 2021 have been addressed in relation to the proposed landscaping species. I welcome the removal of two potentially invasive species (Tutsan and Sea Buckthorn) and clarification of the watercourse buffer width and the establishment of proposed wildflower areas.

The number of nest boxes for Common Swift remains unambitious at two. I would again suggest that several more boxes are a perfectly reasonable ecological enhancement and would recommend that at least six boxes are secured by condition.

If you are minded to grant permission can I suggest that ecological mitigation, compensation and enhancement measures are secured by condition.

Development shall proceed in strict accordance with the ecological mitigation, compensation and enhancement measures detailed within the Ecological Assessment (Ecology Solutions, April 2021) and Habitats Regulations Assessment (Ecology Solutions, October 2021) unless otherwise agreed in writing by the Local Planning Authority. The proposed development shall incorporate a minimum of six nest boxes for Common Swift, installed as per manufacturers' instructions and retained in perpetuity. Ecological mitigation, compensation and enhancement measures shall be implemented as per ecologist's instructions. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Further Comments:

Uploaded 25.11.21

The application is accompanied by an Ecological Assessment (Ecology Solutions, April 2021). This report provides an update to previous survey and assessment works carried out in 2018-19. The application now includes a Habitats Regulations Assessment (Ecology Solutions, October 2021).

The site comprises a large area of species-poor grassland with associated areas of taller herbaceous vegetation, boundary scrub and tall shrubs and trees. A tennis court is present in the site's north-eastern corner and a small watercourse, the Brockhampton Stream, runs along the northern and western boundaries. I am content that the site is of relatively limited ecological value overall, although clearly serves as a valuable area of undeveloped local greenspace.

The site is included within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H11, a Low Use area that has been used by only two Oystercatchers in recent years. I would suspect that the generally unmanaged nature of the grassland at present is less suitable for wintering wader species, and that the site is unsuitable for supporting Dark-bellied Brent Geese. Nevertheless, the site is included within the SWBGS and does provide land functionally-linked to the Solent Special Protection Areas and therefore mitigation for the loss of a Low Use site will be required. This is in the form of a financial contribution based on a per-hectare calculation as detailed within the published SWBGS Mitigation Guidelines. Details are provided within the submitted HRA and are acceptable. The HRA also includes details of mitigation for the issue of nutrient neutrality.
Perhaps the most significant habitat on site is the Brockhampton Stream at the site's boundaries. I welcome the inclusion of a buffer zone alongside the stream and the proposals for this to comprise native grassland and some tree/shrub plantings. The proposed 'wildflower' grassland specification is now included and comprises a newly-created native general meadow mix. The details provided in the appended Biodiversity Net Gain assessment refer to twice-annual management of this grassland, which is suitable.

I remain unconvinced about the use of ornamental species such as Tutsan Hypericum androsaemum. The native plant is a scarce woodland species, and the non-native variety (which I suspect is being proposed here) has invasive tendencies: it's use within the western proposed plantings is not appropriate. Similarly, Sea-buckthorn Hippophae rhamnoides also seems like an odd choice as this is also potentially invasive, to the detriment of native flora: again, it's use in close proximity to the watercourse (which links to the nearby Solent marine habitats) is not appropriate in my view. Having formalised plantings beds within a few metres of the watercourse raises the potential for nutrients (from mulch) or chemicals (from spot treatment during establishment) to enter the watercourse and its buffer. Some further clarification on these matters would be welcome, and a more innovative native-led planting

scheme would provide obvious biodiversity benefits.

I would also like to see more ambitious incorporated enhancements in the built realm. There are a total of two proposed swift boxes on the whole site, in addition to a total of three tree-mounted bat boxes and two other bird boxes. I would suggest that the new office buildings provide a ready opportunity for further integral or wall-mounted nest boxes for Common Swift.

The amended lighting layout reduces the light spillage onto the northern and western boundaries adjacent to the Brockhampton Stream and this is welcomed.

The issues of additional Swift boxes and inappropriate plantings notwithstanding, if you are minded to grant permission can I suggest that ecological mitigation, compensation and enhancement measures are secured by condition.

Development shall proceed in strict accordance with the ecological mitigation, compensation and enhancement measures detailed within the Ecological Assessment (Ecology Solutions, April 2021) and Habitats Regulations Assessment (Ecology Solutions, October 2021) unless otherwise agreed in writing by the Local Planning Authority. Ecological mitigation, compensation and enhancement measures shall be implemented as per ecologist's instructions. Reason: to protect biodiversity in accordance with the Conservation Regulations 2019, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Original Comments:

Uploaded 20.08.21

The application is accompanied by an Ecological Assessment (Ecology Solutions, April 2021). This report provides an update to previous survey and assessment works carried out in 2018-19.

The site comprises a large area of species-poor grassland with associated areas of taller herbaceous vegetation, boundary scrub and tall shrubs and trees. A tennis court is present in the sites north-eastern corner and a small watercourse, the Brockhampton Stream, runs along the northern and western boundaries. I am content that the site is of relatively limited ecological value overall, although clearly serves as a valuable area of undeveloped local greenspace.

The site is included within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H11, a Low Use area that has been used by only two Oystercatchers in recent years. I would suspect that the generally unmanaged nature of the grassland at present is less suitable for wintering wader species, and that the site is unsuitable for supporting Dark-bellied brent geese. Nevertheless, the site is included within the SWBGS and does provide land functionally-linked to the Solent Special Protection Areas and therefore mitigation for the loss of a Low Use site will be required. This is in
the form of a financial contribution based on a per-hectare calculation as detailed within the published SWBGS Mitigation Guidelines.

Perhaps the most significant habitat on site is the Brockhampton Stream at the sites boundaries. I welcome the inclusion of a buffer zone alongside the stream and the proposals for this to comprise native grassland and some tree/shrub plantings. I cannot find the Landscape Specification referred to on the Soft Landscaping drawings (document 829.10.03 appears to be missing). I would very much like to review the proposed wildflower grassland specification. The details provided in the appended Biodiversity Net Gain assessment refer

to twice-annual management of this grassland,
which is suitable. I wonder whether retaining the existing grassland and implementing a suitable management regime would be more sustainable in the longer term, rather than attempting to create a new habitat. This would also avoid having to undertake any soil stripping/seeding works in close proximity to the watercourse. This may of course have implications for the Net Gain calculations. I am also a little unsure about the use of ornamental species such as Tutsan Hypericum androsaemum. The native plant is a scarce woodland species, and the non-native variety (which I suspect is being proposed here) has invasive tendencies. I would much prefer any more formal landscaping in proximity to the watercourse to comprise suitable native tree, shrub
and herbaceous perennial species more suited to the local conditions. Sea-buckthorn Hippophae rhamnoides also seems like an odd choice as this is also potentially invasive, to the detriment of native flora. Having formalised plantings beds within a few metres of the watercourse raises the potential for nutrients (from mulch) or chemicals (from spot treatment during establishment) to enter the watercourse and its buffer. Some further clarification on these matters would be welcome, and a more innovative native-led planting scheme would provide obvious biodiversity benefits.

I would also like to see incorporated enhancements in the built realm. There are as yet no firm details of proposed bird and bat boxes on new buildings. I would suggest that the new office buildings provide a ready opportunity for integral or wall-mounted nest boxes for Common swift as well as for bat roosting units. Further details are required.

The proposed lighting layout does appear to show minimal light spillage onto the watercourse and proposed buffer, although with areas of c.2-5lux spillage in some places. The preference would be to have no spillage onto the watercourse or its buffer. The ecology report states that light spillage onto boundary vegetation will be minimised and I would query whether the ecology report was produced following the production of the submitted lighting strategy.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated and are acceptable.

Economic Development HBC

19.10.21

The proposed development will provide employment space and new premises for business growth. This development would follow the Havant core strategy focus on providing new employment to the borough. This is in line with policy CS1 of the Core Strategy.

The Economic Development Office therefore considers that the proposal still supports the Local Plan Policies in so far as it will support the growth of the borough's local economy, as it provides for local employment and provides new sites for business growth creating additional employment.

Given the scale of the development, the Economic Development office seeks that the applicant enters a Local Employment & Training Agreement to increase apprenticeship jobs, promote career opportunities and secure jobs for local residents to contribute towards a reduction in out commuting. This comprises the following mitigation measures:

- An agreement to assist in the placement of apprentices and unemployed from the local area into jobs during the construction phase.

Negotiation of obligations including; direct labour agreements, training, work experience/placements and apprenticeships to be implemented before completion of the development.

The proposed development presents an opportunity to build and enhance the skills of the local workforce by providing training and employment opportunities for local residents during the construction phase.

The Submitted Havant Borough Local Plan 2036 sets out in Policy DR2 the council's view on boosting local skill levels and community integration. It states that 'significant new residential and commercial development will be expected to support local people in assessing employment and skills training'.
Officer Comment: Please note that the submitted plan has been withdrawn.

Also, by providing for local employment and skills needs the proposal would advance the NPPF, in particular paragraph 80 which seeks to enable each area to build on its strengths, counter any weaknesses and address the challenges of the future
The Economic Development Office considers that the proposal supports Local Plan Policies CS2 and CS3 and the NPPF Paragraph 80 in so far as it provides additional employment. The office also recognises the need for a Local Employment & Training Agreement as stated within Havant Borough Local Plan. **Officer Comment:** Paragraph 85 of the NPPF 2024 is now relevant.

Environment Agency

30/11/23

We have reviewed the information as submitted and set out our position below.

Environment Agency Position
We request that the following condition be attached to any planning permission granted, and that the details in relation to the condition be submitted and approved by the Local Planning Authority. The proposed development will only meet the National Planning Policy Framework (NPPF) policy to not increase flood risk if the following planning condition is included.

Condition
The development hereby permitted must not be commenced until such time as a scheme to ensure protection and maintenance of the newly constructed flood bund and flood storage areas has been submitted to, and approved in writing by, the local planning authority.

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason To ensure the structural integrity of the existing flood defences thereby reducing the risk of flooding, and to reduce the risk of flooding to the proposed development and future users.

Advice to LPA
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,

with details included in the application document “Flood Alleviation Completion Report”. These works were carried out to reduce of the risk of flooding to the development and therefore it is important that they are maintained for the lifetime of the development.

Advice to LPA/Applicant
Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you’d like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

CIRIA Code of Practice for property flood resilience Code of practice for property flood resilience C790 (ciria.org) British Standard 85500 – Flood resistant and resilient construction
https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686

Environmental Permit
The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:
• on or within 8 metres of a main river (16 metres if tidal)
• on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
• on or within 16 metres of a sea defence
• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
• in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Further Comments

Email:
Thanks for re-consulting us on the above application. We haven’t yet provided comment but it appears that our previous response to this application hasn’t been fully addressed.

Just to clarify, we require the applicant to provide the modelling files used for the Flood Risk Assessment(FRA) for the planning application to undertake a model review so that we can ascertain whether the model is appropriate to inform the FRA.

We are aware that the applicant has had a model review for the purpose of obtaining a Flood Risk Activity Permit(FRAP). The model review for a FRAP is carried out under a different

context, as it is for a permit, it is only to ensure that the culvert removal would not increase flood risk elsewhere, we would now need to undertake a more detailed review, in the context of planning, to assess the alteration of the flood zones that they suggest has occurred as a result of the culvert removal. Without the model review for planning we are unable to comment further on this application.

It is worth noting that a model review at planning stage may take up to 8 weeks. The sooner we can have access to those modelling files the sooner our Evidence and Risk team are able to start the model review.

Original Comments:

17.08.21

Environment Agency position

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA is based upon the assumption of modelling outputs that have not been reviewed by us for planning purposes. The modelling undertaken by the Applicant places the site within Flood Zone 1, which is contrary to our Flood Map for Planning which places the site largely within Flood Zone 3 (i.e. an area at high risk of flooding). The FRA does not therefore adequately assess the flood risks posed by the development. This is because its contents are based upon the outputs of modelling that we have not had the opportunity to scrutinise and ultimately verify for practical use in the allocation of Flood Zones.

Overcoming our objection

In order for us to find the submitted FRA acceptable, the Applicant should submit to us the model files and all associated reports in order for a model review to be undertaken. From this review we will ascertain whether the outputs of the provided modelling are fit for purpose and of adequate standard to inform the FRA. Upon completion of the model review, we will be in a position to comment on the adequacy of the submitted FRA.

Please re-consult us on any additional information submitted and we will respond within 21 days of receiving it.

If the Applicant requires clarification on the files and associated information required in order for us to undertake a formal model review, please contact psohiow@environment-agency.gov.uk. Please note that model reviews can take between 6 – 10 weeks to be completed depending on our workloads and incident response work at the time.

Advice to the Local Planning Authority

Our objection

We will always support and substantiate our objections to major development proposals at appeal wherever a refusal is lodged in line with our advice. If you are minded to grant permission against our advice, please contact us before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Sequential test

Our response to this application is on the understanding that the Local Planning Authority is satisfied that the Sequential Test has been adequately demonstrated in accordance with the requirements set out in the National Planning Policy Framework (NPPF) paragraph 162, and paragraph 019 of the Planning Practice Guidance to the NPPF for Flood Risk and Coastal Change.

This means that before proceeding to determination, the Local Planning Authority must apply the Sequential Test and therefore, must consider whether the Applicant has demonstrated and sufficiently justified that no alternative sites are available in lower flood risk zones.

Please note that it is the role of the Local Planning Authority to determine and assess the acceptability of the Sequential Test. We do not comment upon the comparative assessment of land, its availability or suitability for development.

Environmental Health

Further Comments:
30.08.22

Observations / Comments:

I refer to the above application under the Town & Country Planning Acts passed to this Service for comment.

I have read the documentation provided by the applicant, and can comment as follows: The most recent noise assessment carried out at an additional two points adjacent nearest residential receptors, has shown a significant decrease in night time background noise levels adjacent the residential properties in Brockhampton Road, as opposed to those at the original monitoring point. No night time measurements were achievable adjacent residential properties in Brockhampton Lane.

However it is advised by the consultant that there are no changes to the conclusions of the report, and that no adverse noise effects are predicted as a result of the construction or operation of the development, either during the daytime or night time periods.

The proposal is for an office block plus 4 commercial units in flexible B2/B8 or E(g)(iii) use. There is obviously no indication at this time as to what businesses may occupy these units in the future, and what fixed or mobile plant including air moving plant and / or equipment, may be required by individual tenants, including any additional plant to be associated for the suggested office tenants. This will require a condition to ensure any necessary mitigation measures are provided to ensure no adverse impact on nearby residential receptors.

Whilst this office raises no further objection to this application, I would ask that the following conditions and informative, be included in any approved condition notice:

Condition 1: Noise from plant and equipment
Each industrial unit and office tenants, shall provide an acoustic assessment to show that the rating level of any plant and / or equipment, fixed or mobile, for use as part of their unit, will be at least 5 dB below the existing background levels, which must be submitted to and

approved in writing by the Local Planning Authority. The assessment must be carried out by a suitably qualified acoustic consultant / engineer and be in accordance with BS4142: 2014 Methods for rating and assessing industrial and commercial sound. Background levels have been established at nearest residential receptors, as per the TRC Noise Impact Assessment report dated March 2022.
Reason: To ensure the amenities of nearby residential properties are not impacted upon by any external noise levels and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework

Condition 2: Construction Environmental Management Plan
The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The following should be added to the previously submitted CEMP and should be in operation for all phases of the development i.e. demolition, excavation, clearance and construction: The plan should include, but not be limited to:
a. Procedures for maintaining good public relations including complaint management, public consultation and liaison and site mangement contact details
b. Arrangements for liaison with the Council's Pollution Control Team
c. All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08:00 Hours and 18:00 Hours on Mondays to Fridays and 08:00 and 13:00 Hours on Saturdays and at no time on Sundays and Bank Holidays.
d. Deliveries to and removal of materials, plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above.
e. Details of measures to be employed to control the emission of noise during the above phases to be provided. BS5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and Part 2: Vibration (BSI, 2014v) provide guidance on the requirements and indicative noise and vibration levels and criteria;
f. Procedures for emergency deviation of the agreed working hours
g. Measures for controlling the use of site lighting during all phases, whether required for safe working or for security purposes, to ensure no impact on any nearby residential receptors;
h. Control measures for dust and other air-borne pollutants. It should advise as to what measures are to be put in place for the control of any dust that might emanate from the development site. Furthermore the methods of dust control should be in accordance with the guidance as laid out in the BRE Report 456 - Control of Dust from Construction and Demolition activities, and also the IAQM Guidance on the assessment of dust from demolition and construction 2014. It should also be noted that besides the keeping of haul roads damp during dry weather conditions, any areas where tracked excavators, dozers and the like are working, are also be kept damp at all times;
i. No bonfires to take place on the site at any time;
j. A scheme for recycling/disposing of waste resulting from demolition and construction works is to be implemented
Reason: To minimise disturbance to all nearby sensitive receptors and to ensure the amenities of the surrounding occupiers are not unduly impacted upon, during all phases of the development.

Condition 3: Piling
The least intrusive noise and vibration method of piling shall be employed at this site. This should be accompanied by a justification as to the reasons why a particular piling method has been chosen, and additionally the proposed mitigation methods to be employed, to ensure minimal impact on nearest residential receptors.
Reason: To ensure the amenities of nearby residential properties are not impacted upon by any external noise or vibration levels during any piling operations, and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the

National Planning Policy Framework

Informative:

External Lighting:
It would appear from the submitted lighting assessment, that there should be limited, if any, impact on neighbouring properties. However if complaints should arise after completion, as a result of light spill / nuisance impacting on residents enjoying the amenities of their properties, this will be investigated under the relevant nuisance legislation, & the developer may thereafter be required to carry out any remedial measures to mitigate said impact. It is also considered that the lighting to be provided, can potentially be on throughout the hours of darkness if there is a 24 hour operation at any of the units.

Original Comments:

09.11.21

Observations / Comments:

I refer to the above application under the Town & Country Planning Acts passed to this Service for comment.

I have read the documentation provided by the applicant, and can comment as follows:

Having read the acoustic report provided I can advise the following: The day / night background noise levels are taken at one monitoring point only, adjacent the ex. medical centre, over a 24 hour period on a week day. It is possible the existing noise environment has been inadequately characterised. We would expect probably a week's worth of monitoring to be carried out including over a weekend to capture potentially lower noise levels.

The monitoring that was carried out, was at a position not far from Solent Road. The noise predictions and impact assessment are based on these noise levels. Noise levels at nearby noise sensitive receptors are likely to be lower, and for this reason further noise monitoring is required. Being relatively close to the road means that the noise levels are likely to be inflated which may potentially underestimate the impact when carrying out a BS4142 assessment. Also the shielding provided by the proposed units may serve to decrease the background sound level even further and any localised industrial noise could in theory have an even greater impact. I would request clarity on actual ex. BG levels at the two points adjacent nearest residential receptors, as it is suggested that any new additional fixed plant items, for future tenants of the industrial units and or the office tenants, should not exceed the measured typical background noise levels, which is based on those at the monitoring point mentioned above.

I cannot see that any consideration has been given to what the cumulative noise impact would be from all noise sources including the proposed development. It may be that receptors are already exposed to a poor noise environment which obviously should not be made worse.

There has been no assessment of potential mobile operational activity at the proposed site (other than for HGV movement) including from lorry, fork lift truck and passenger car movements, including impact noises from closing/opening car doors, refrigeration plant of lorries, engine start-up and idling. The report has used British Standard 8233 to assess the impact of HGV movements and in turn underestimates the potential impact. BS8233 should be used for continuous anonymous noise sources which these are not. BS4142:2014 should

be used to demonstrate the impact and this is confirmed in the standard itself. The typical and worst case scenarios should be considered and where mitigation measures are required these should be clearly stated and supported by calculations. Equally the prediction of noise levels at the nearest noise sensitive facades should be supported by calculations and included in the report. Special consideration needs to be given to any potential low frequency noise sources as BS4142 may underestimate it's impact.

The report compares the predicted noise level from plant to be located on the roof of the Portsmouth water office block against BS8233. As referred to earlier, I believe this is the wrong standard to use and could underestimate the potential impact. However, a BS4142 assessment has been carried out with the predicted noise level compared against the reported and existing daytime background sound level of 58 dB LA90,16hours. As advised prior, we believe that this reported figure may possibly be inaccurate, thereby potentially underestimating the impact. The noise levels as measured, could also potentially be lower once the 4 industrial units are built which could in fact lower the background sound level at noise sensitive receptors at Brockhampton Road especially. Again, the impact may have been underestimated because of this.

The BS4142 calculation does not take into account any low frequency noise which is sometimes problematic with fixed plant. No consideration has been given to the potential impact of plant at night, as it is assumed the office block will be closed at this time; if this is to be the case then perhaps it ought to be conditioned as such . Again we require all of the calculations in the report including reporting of octave / 1/3 octave band levels.

This application includes for B2 use. This is can be problematic because in theory any noise from any type of industry can be controlled by essentially sticking it in a sound proofed box. The question is, is whether the mitigation required would be practicable and achievable. It may require that all apertures remain closed, have alternative means of ventilation and if necessary, exhaust ventilation for dust and/or odour. However this will be dealt with when the necessary acoustic reports are submitted, if required.

It is also questionable whether this site could be operated 24-hours day without having any impact on neighbours, albeit it is stated that the assessment demonstrates that the construction and operation of the proposed units will not create noise impacts at adjacent residential receptors.

I would therefore recommend refusal at this time.

As we also have no indication at this time of the final uses of the proposed industrial units, which can include 24/7 working, fixed plant including air moving plant (located internally or externally & also where i.e rear, front or roof?) and the potential use of fork lift trucks, metal cages, external or internal loading / off-loading of HGV's, vans and the like, associated impact noises, reversing alarms and so forth. This would need an additional condition to be imposed to cover this and any additional plant to be associated for the office tenants:

A likely condition in this regard as below:

Condition 1: Noise from plant and equipment & operational noise
Each industrial unit and office tenants, shall provide an acoustic assessment to show that the rating level of any plant, equipment & / or operational noise, as part of their unit, will be at least 5 dB below the existing background levels, which must be submitted to and approved in writing by the Local Planning Authority. The assessment must be carried out by a suitably qualified acoustic consultant / engineer and be in accordance with BS4142: 2014 Methods for rating and assessing industrial and commercial sound. Background levels shall be established at nearest residential receptors.

Reason: In order to safeguard the amenities of adjoining residential occupiers.

External Lighting:
It would appear from the submitted lighting assessment, that there should be limited, if any, impact on neighbouring properties. However if complaints should arise after completion, as a result of light spill impacting on residents enjoying the amenities of their properties, this will be investigated under the relevant nuisance legislation, & the developer may thereafter be required to carry out any remedial measures to mitigate said impact. It is also considered that the lighting to be provided can potentially be on throughout the hour of darkness if a 24 hour operation at any of the units.

The Construction Environmental Management Plan:
The following should be added to the current CEMP and should be in operation for all phases of the development i.e. demolition, excavation, clearance and construction:

a. no works or ancillary operations associated with the above phases at the development, which are audible at the site boundary, shall take place on any Sunday or Bank / Public Holiday, nor on any other day except between the following times: Monday to Friday: 8.00 – 18.00 and Saturday: 8:00 – 13.00;
b. Deliveries to and removal of plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above.
c. No bonfires to take place on this site, during any phase of the operation;
d. Control measures for dust and other air-borne pollutants. It should advise as to what measures are to be put in place for the control of any dust that might emanate from the development site. Furthermore the methods of dust control should be in accordance with the guidance as laid out in the BRE Report 456 - Control of Dust from Construction and Demolition activities. It should also be noted that besides the keeping of haul roads damp during dry weather conditions, any areas where tracked excavators, dozers and the like are working, are also be kept damp at all times.;
e. Procedures for emergency deviation of the agreed working hours.
f. Details of measures to be employed to control the emission of noise during the above phases to be provided. BS5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and Part 2: Vibration (BSI, 2014v) provide guidance on the requirements and indicative noise and vibration levels and criteria;
g. If any piling is envisaged for this site, full details must be submitted to this office, with regard to the proposed method/s to be employed, and the probable duration of these operations;
h. Measures for controlling the use of site lighting whether required for safe working or for security purposes to ensure no impact on neighbouring properties.
i. Procedures for maintaining good public relations including complaint management, public consultation and liaison.

Environmental Health: (Environmental Control):

13.10.22

Observations / Comments:

I have reviewed the application documents and would like to make some brief comments on a variety of subjects – Ground Contamination / Geo-Environmental Risks, Transport Demand & Air Quality, SuDS, and control of short-term construction impacts.

Construction Environmental Management Plan (CEMP)

The submitted CEMP is notably brief. In respect of the control of pollution in site runoff, the

document places great reliance on the requirement for the contractor to prevent contamination effecting the ground water table and nearby water courses by working 'in strict accordance with the EA Pollution Prevention Guidance Notes', which are listed, but not appended to the plan.

Where observed, working in accordance with the listed guidance would represent best practice, but it is not clear that copies will be required to be kept on site, or made available to staff & sub-contractors specifically, that there is a person specifically responsible for ensuring that staff and subcontractors are aware of the contents of these documents. Given this, it is difficult to see how it might be expected that works on site will proceed in strict accordance with these documents. This is an important issue given the sensitivity of ground & surface waters by virtue of their proximity to abstraction points for potable supply.

I appreciate that a CEMP is a live document. I would recommend that the document be amended to require that copies of the listed guidance be kept at the site, and that a specific person (or job role) be identified as being responsible for ensuring that the requirements of the guidance are communicated to all staff & sub-contractors, and are enforced during day-to-day activity. This issue is insufficient to sustain an objection, but it should be noted that for enforcement purposes, the principle of adherence to these documents will be taken as a given, and a benchmark for 'reasonable' when considering legal tests

Surfacewater Drainage, Pollution Controls

I have reviewed the Drainage Planning Strategy included within the I&L Consulting Ltd. response to EA, Portsmouth Water and LLFA; and note the pollution control features represented by permeable surfaces and proprietary interception and containment units. The strategy appears to offer suitable degree of protection, and I have no objections to raise, or material comments to make.

Contamination / Geo-Environmental Risks

I have reviewed the Delta Simons Phase I/II Geo-Environmental Assessment Ref: 19-1058.01 March 2021.

The assessment results & conclusions are broadly agreed to be appropriate. On careful consideration of the ground gas results, I would consider that in concluding that the site corresponds to gas-risk characteristic situation 2 (CS2) the assessment has taken a conservative approach. I do not consider it to be necessary to impose a planning control in respect of managing the ground gas risk to the proposed structures. The assessment has also adopted conservative generic screening values (GAC's) in respect of groundwater protection. This is for understandable reasons given the location – however it is worth noted that the GAC's with their origin in the WFD2015c are heavily caveated, and that alternative tests within the same instrument provide significantly greater alternative standards. This lends some confidence to the conclusion of the report that the noted exceedances of GAC are not material.

I have looked up contextual information from other ground investigations undertaken on nearby sites, and find that the information from these reports supports the conclusion (to disregard metallic contaminants in groundwater), rather than challenging it.

In general, the results & conclusions of the report are favourable. Perhaps of most material relevance is the reference to a need for a watching brief for dissolution features (at 6.10) . I note that this is an issue that Portsmouth Water Company also raised within it's consultation response, referring to stand-off zones or ground treatment.

I am unclear on how such a watching brief would work in practice – post-consent, the implementation of stand-off zones would likely represent a material change to the awarded consent (potentially requiring services to be diverted / re-routed, or buildings moved). The trial hole records display significant variability in depth to chalk, against a ground level that varies by only around 1m between extremes across the site. This is interpreted as a fault corridor, but given the very short lateral distances between differences of more than 8m (e.g. BH103 cf. TP104, 105 & 107, or BH104 cf. TP107 & 108), it is possible that the variability is evidence of collapsed solution features.

This is a geotechnical risk, and is not material to planning with respect to policy relating to ground contamination. I am merely raising a red-flag that it may be inadvisable to rely upon a watching brief to identify solution features, as positive identification may require a targeted geotechnical survey and specialist interpretation of results. It is unclear to me how a watching brief would provide certainty of absence, and I am concerned that the identification of a significant solution feature that could pose ongoing stability issues to the proposed buildings might in principle be material to planning insofar as requiring those buildings to be repositioned. If the authors (&/or Portsmouth Water) believe the presence of dissolution features to be a genuine material risk then I would expect this risk to be addressed prior to determination, whether through investigative / assessment, or through a foundation design capable of managing anticipated risks without the need for any amendments to the site layout. If the authors are satisfied that active features are unlikely to remain (trial hole logs suggest historic features), and that proposed foundations are unlikely to be compromised; then this becomes a building control matter that isn't material to planning. It might be worth seeking to confirm.

I would conclude that the 'unexpected contamination' condition proposed by Portsmouth Water ('condition 3') will be sufficient to manage residual uncertainty with respect to the chemical quality of soils at the site. Use of this condition is supported, and I have no other recommendations to make in respect of contamination risk.

Transport Demand & Air Quality

Operational phase transport demand for the proposed development is estimated to be 818 trips on an AADT basis. All of these trips are assumed to be new to Solent Road, though a proportion of trips will already be present on the wider local road network, being diverted from Portsmouth Water's existing West Street Site. Trips associated with the proposed flexible use commercial buildings are assumed to be new to the local road network.

The Air Quality Assessment (at 5.1) concludes that +818 AADT is insignificant in air quality terms, based primarily upon predicted local background levels & local authority monitoring results returning values 'well within their relevant national air quality objectives'.

This high-level assessment accounts only for the statutory thresholds, and fails to account for proportional change, or the WHO exposure recommendations which notably benchmark health impacts at around 25% of the statutory limits.

EPUK & IAQM guidance 'planning for air quality' (v1.2, 2017) includes indicative criteria 'to proceed to an Air Quality Assessment' where there is expected to be a change of >+500 AADT. In line with above, it is expected that Solent Road will experience +818 AADT as a direct result of the proposals, amounting to approximately +10% current flows.

The agreed routing model assumes 46% traffic will route via East Solent Road, and anticipates 58% to route West via Solent Road. The closest critical receptor is at Brockhampton Lane, represented by local authority monitoring point 7B. This location currently exceeds WHO recommendations for annual mean NO2 exposure by 150%, with

the measured annual mean approximating the recommended 24hr mean limit.

The air quality assessment acknowledges LP2036 emerging (Amenity & Pollution) policy E22, and (Air Quality) policy E23, but makes no response, nor any recommendations, in respect of their requirements. It should be noted that the emerging local policies have their it's roots in the NPPF requirements, and may be taken to represent the Council's view of how the related NPPF policies should be met. As indicated above, the assessment makes a qualitative judgement only in respect of the operational phase impact, and does not seek to dismiss the need to consider air quality further on the grounds of any screening or health based criteria, nor upon grounds of a negligible magnitude of change being likely. I can't accept the conclusions of the report at face value, without considering these aspects.

Based upon the transport demand figures presented, Solent Road (East) will experience an increase of approximately +376 AADT, this is below the IAQM indicative criteria (interpreting 'elsewhere' to represent a specific road link, and not a specific road, otherwise we would be in exceedance). Solent road is subject to significant local congestion during peak periods, but flows are significantly different to the East & West of the Tesco Store access. There are few sensitive receptors, on this link, with the Brockhampton Lane properties being the most relevant. Sensitive receptors to the West are represented by residential properties which have a substantially greater offset to the kerbline, and by receptors on the Northern limb of Brockhampton Road, where offsets are only ~5m, but development impact is expected to be +350 AADT.

The results of an air quality assessment, benchmarked in accordance with the IAQM & EPUK guidance against health criteria (as opposed to statutory limits) would likely result in a non-negligible magnitude of change (in ambient NO2) at the sensitive receptor location. Benchmarked against the statutory limits only, the result would likely be in line with the submitted air quality assessment – the signficiant difference being that between what is said to be likely to materially impact health relative to that which is likely to risk a regulatory standard being breached.

The material planning question is whether the likely material change against a health benchmark is contrary to the principles of NPPF 2021 para 174 e) '[preventing new development from contributing to]… unacceptable levels of…air…pollution. Emerging policy E23 would have sought to ensure that the development should 'help to improve local environmental conditions such as air…quality', meaning that we could rephrase the material planning question to 'are the proposals to offset emissions (to air) sufficient to mitigate &/or offset the likely magnitude of development-related harms'.

Sustainability, climate & carbon, transport and parking are relevant to the question of emissions offsetting. I'll briefly cover these aspects below.

Design & Access-, Planning-, and Energy & Sustainability Statements, Framework Travel Plan (Air Quality Emissions Offsetting)

• Planning statement 6.79 refers to parking provision. I note that the proposed provision exceeds B8 requirements, but amounts to only approximately 80% of the B2 requirement (in accordance with 2016 SPD). The balance of flexible uses might mean that a 70%).
• The energy & sustainability statement table 6.2 provides an appraisal of LZC technologies, concluding several options to be 'not viable', whereas the justification for some would perhaps be better described as being 'undesirable' with respect to capital costs.
• It is however noted that Air-to-Air reversible ASHP's are being proposed to serve space heating requirements, and it is proposed to configure the system to provide internal heat reclaim (to serve an MVHR function – uniquely available to air-to-air devices).
• It is also noted that an 15.5 KWp solar PV array is proposed

• The remainder of the sustainability features fall under the 'fabric first' strategy, with natural light to be delivered by 15% rooflight coverage, and cooling demand to be managed through building design, selection of reflective colours & materials, and an enhanced insulation specification (improvement upon L2A requirements by at least +25% in relevant elements, with building modelling confirming that no occupied space is subjected to 'excessive' solar gain).
• The framework travel plan targets a fairly standard 10% mode-shift from single person occupancy vehicle trips, biased predominantly toward public transport modes (+4%). The framework plan is vague on compliance benchmarking (e.g. not specifying a minimum survey response level, acceptable margins of error, or contingency methods for demonstrating modal share). The plan notably omits several sensible proactive measures, and is non-specific on remedial actions that are considered to be available in the event that performance targets are missed. Section 1.2.1 implies that there is no agreement in place for Hampshire County Council (or another body) to independently monitor the plan.

It does not appear that the NPPF provisions for energy, sustainability and climate (e.g. at para's 152, 157) are particularly strong insofar as they directly relate to proposed development, probably in practice falling short of the emerging policy requirements seeking an excellent BREEAM rating. On the assumption that this development is being determined substantially under the presumption in favour of sustainable development, it is unlikely to be justifiable to regard E12 as carrying full weight.

It would however seem to be justifiable in planning terms to either seek to confirm (prior to determination) the proposed allocation of EV charging facilities at proposed parking spaces, alongside the anticipated means of modification (in response to utilisation monitoring), or alternatively, to seek to secure by condition the agreement of the same, to be implemented prior to occupation.

I would anticipate an initial parking space allocation to be provided as operational EV charge points as part of the development, and a 'contingency' allocation of spaces to benefit from minimum preparatory civils to facilitate easy-installation of EV charging points in future (e.g. in response to high levels of uptake, as the fleet proportion of EV's increases). Preparatory works should include reasonable redundant capacity at substations and electrical distribution points so as to accommodate the power demands of future EV charging points (e.g. at least the number of 'minimally prepared' spaces). It is assumed that EV charging for delivery/fleet vehicles would be an operational matter, to be encouraged, but ultimately a matter for unit occupiers to implement on the basis of business need.

In respect of transport, given the relatively basic framework travel plan submitted, I would also suggest that confirmation of independent oversight of progress against the plan is to be put in place. In the absence of this, I would suggest that the plan be enhanced to both reflect & leverage the inherent transport-sustainability-potential of the development location. This is important as the framework plan will inform the design & provisions of the unit/occupier specific plans.

In consideration of the policy context, and the number of air-quality-sensitive receptors likely to be affected by the increased transport-related emissions associated with this development, and subject to the clarifications/enhancements suggested above; I would consider it to be both reasonable & proportionate to accept the above-referenced proposals to represent sufficient emissions offset of development emissions (transport and buildings) to satisfy the NPPF requirements (as expressed in emerging policy E23).

No objections arise with respect to the principle of development. Proposals are generally supported, but some minor enhancements / assurances are recommended to be sought as planning matters, justified based upon transport, low carbon, sustainability and air quality

policies of the NPPF.

Hampshire Fire & Rescue

Original Comments:

02.08.21

Description of Works:

HIWFRS understands that the project involves proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use) and new employment premises (Use Class B2.B8/E(g)(iii) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees

I confirm that Hampshire & IOW Fire and Rescue Service (HIWFRS) has received your application, dated 30 July 2021. The inspector named above has considered the information provided and has made the following comments:

Building Regulations: Access for Firefighting

Access and facilities for Fire Service Appliances and Firefighters should be in accordance with Approved Document B5 of the current Building Regulations.

Hampshire Act 1983 Section 12 – Access for Fire Service

Access to the proposed site should be in accordance with Hampshire Act 1983 Sect, 12 (Access to buildings within the site will be dealt with as part of the building regulations application at a later stage). Access roads to the site should be in accordance with Approved Document B5 of the current Building Regulations.

Fire and Rescue Services Act 2004

The following recommendations are advisory only and do not form part of any current legal requirement of this Authority.

Access for High-reach Appliances

High reach appliances currently operated by the HIWFRS exceed the maximum requirements given in Section 17 of the Approved Document B. When considering high rise buildings these variations should be considered as additions and incorporated as follows. Structures such as bridges, which a high-reach appliance may need to cross should have a maximum carrying capacity of 26 tonnes. Where the operation of a high reach vehicle is envisaged, a road or hard standing is required 6m wide. In addition, the road or hard standing needs to be positioned so that its nearer edge is not less than 3m from the face of the building.

Water Supplies

Additional water supplies for fire fighting may be necessary. You should contact the Community Response Support, Hampshire & IOW Fire and Rescue Headquarters, Leigh Road, Eastleigh, SO50 9SJ (risk.information@hantsfire.gov.uk) to discuss your proposals.

Fire Protection

HIWFRS would strongly recommend that consideration is given to installation of an Automatic Water Fire Suppression Systems (AWFSS) to promote life safety and property protection within the premises.

HIWFRS is fully committed to promoting Fire Protection Systems for both business and domestic premises. Support is offered to assist all in achieving a reduction of loss of life and the impact of fire on the wider community.

Testing of Fire Safety Systems

HIWFRS strongly recommends that, upon commissioning, all fire safety systems are fully justified, fully tested and shown to be working as designed. Thereafter, their effectiveness should be reconfirmed periodically throughout their working lifecycles.

Firefighting and the Environment

Should a serious unsuppressed fire occur on the premises, the water environment may become polluted with 'fire water run-off' that may include foam. The Service will liaise with the Environment Agency at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the building and its contents.

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages.

Timber-framed Buildings

These types of buildings are particularly vulnerable to severe fire damage and fire spread during the construction phase.

The UK Timber Frame Association publication '16 Steps to Fire Safety on Timber Frame Construction Sites' provides guidance on this issue and is available from:
https://ttf.co.uk/download/16-steps-fire-safety-timber-frame-construction-sites/
This guidance should be read in conjunction with the 'Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation', published by the Construction Confederation and The Fire Protection Association (Sixth Edition, ISBN 1-902790-33-2)

Copies of the 'Joint Codes of Practice' and useful sister publication, 'Construction Site Fire Prevention Checklist' (Second edition, ISBN 1-902790-32-4), are available for purchase from the Fire Protection Association: (www.thefpa.co.uk) and from the Construction Industry Press:
(Publications for Construction Professionals and Builders | CIP Books)

Hampshire Highways

26/03/24

Thank you for your re-consultation on the above full planning application. In response to previous comments raised by the Highway Authority dated 18 October 2023 and following direct discussions with the applicant, a Transport Assessment Addendum (hereafter, TAA), has been submitted.

The information provided within the TAA has not addressed all outstanding matters. Notwithstanding the above, the Highway Authority have reviewed the TAA and have the following comments to make. Reference to outstanding matters is discussed within this response where appropriate.

Policy Status

The applicant should be made aware that Hampshire County Council's Local Transport Plan 4 has been adopted in February 2024 which provides a new set of guiding principles that will be relevant when determining this application.

Solent Road – Proposed Pedestrian and Cycle Improvements

S278 Works:

Drawing J32-5257-PS-016 shows the pedestrian and cycle improvements. As these works connect the development access into the existing on carriageway cycle route at Brockhampton Lane and the facilities to the east, it has been agreed that this is to be provided as part of a S278 works for the site. The Highway Authority engaged in direct informal discussions in June 2022 regarding the proposals. Several concerns were raised, and these do not appear to have been addressed.

The original request for offsite highway works was to provide LTN1/20 compliant provision for cyclists along Solent Road to the Brockhampton Road/Solent Road roundabout due to the aspiration to connect Solent Road with the existing cycle infrastructure on Harts Farm Way. Since then, the Kingscroft application (APP/22/00669) has proposed a scheme for the provision around the Brockhampton Roundabout connect to this site, through the provision of shared use infrastructure. Given the scale of the various developments within the area the Highway Authority require pooling of S106 funding/S278 works from these sites to deliver the full Solent Road to Harts Farm Way scheme.

This site is proposing to deliver through S278 a 3.0m shared use footway/cycleway from the west of the site access to a location east of the Brockhampton Lane refuge crossing. A cycle slip is provided on the western side to allow cyclists to access and egress the shared use path in the absence of the wider Solent Road scheme coming forward. However, once the complete scheme is provided, cyclists will be able to stay on the northern side of Solent Road utilising the shared use path.

Before the shared use route crosses Brockhampton Lane, it should be extended north to tie in with the shared use path to access the medical centre and providing cyclists with an appropriate location to re-join the carriageway. Similarly, after cyclists have crossed Bedhampton Lane, appropriate facilities will need to be provided which allow cyclists to re-join Solent Road to the east of the junction. The junction radius may need to be amended to allow a larger landing area on the eastern side of the crossing and suitable space for cyclist to join the route or rejoin the carriageway.

The current proposals shown do not provide cyclists with a continuous route into the site access road itself and does not provide any facilities to access and egress the carriageway safely. This is not considered acceptable for achieving the aims of the scheme.

To address these issues, the shared use path should extend into the site and drop cyclists on carriageway at a safe location along the access road. The route should also extend across Brockhampton Lane before cyclists are dropped on carriageway at a point east of the junction. The required amendments will integrate the path and the wider network and would provide cyclists with the necessary facilities to access the route when approaching on carriageway.

Should constraints within the highway boundary limit the ability to provide cycle provision at an appropriate width across Brockhampton Lane, a pedestrian crossing incorporating the above comments for cyclists should be considered. If the crossing at this time cannot support cycle movements an island with suitable width should still be provided to allow future connection should the opportunity arise and creating a more attractive area for pedestrians to wait. It would also provide a safe area should cyclists chose to use it to then rejoin Solent Road from the Brockhampton Lane give way junction.

The proposed works should be subject to a Stage One Road Safety Audit (RSA1) and supported with a designer's response ahead of an approval being granted. All comments raised above are subject to the findings of the RSA1 and the Highway Authority reserve the right to make further comments on receipt of the RSA1.

All crossing points along this route should be supported by cyclist visibility splays in accordance with LTN 1/20 and HCC TG3.

S106 Contribution:
The Highway Authority have frequently raised the importance of mitigating the off-site impact of the development on the Solent Road corridor considering the addition of the proposed development trips on this constrained part of the network. Whilst it is acknowledged improvements are to be provided as part of the site access works, the need for a financial contribution towards the wider Solent Road corridor in addition to the S278 works to mitigate against the impact of the development were discussed with the applicant directly. Whilst the Highway Authority are content that the additional extents of the scheme to the west of the site should be delivered through S106 funding to ensure a coherent delivery of the scheme the issues arising from the development on Solent Road itself remain a concern, which the current extents of the S278 works would not aid in mitigating appropriately. The S278 improvements serve to directly access the development from the existing cycle routes.

Solent Road is not conducive to on-carriageway cycling due to the traffic flows present. Considering 81.3% of people to this site and forecast to drive to work (56 and 58 trips in the AM and PM peaks respectively and 451 daily vehicular trips), it is imperative that adequate improvements are made towards sustainable infrastructure improvements to encourage travel to work via sustainable modes. Modal shift from these vehicle users is necessary to reduce the reduction in the private car to ensure compliance with LTP4. Alternatively, provision which enables existing journeys to be undertaken by sustainable modes can offset the additional vehicle demand generated by this development and in particular at the Solent Road junction with Park Road North/South.

The works set out by the Kingscroft development have been costed at £1.5 million. The Highway Authority will require a proportionate contribution towards the cost of these works to mitigate against the impact of any future development which has an impact on the Solent Road Corridor. A contribution towards these works is considered directly

related to the development due to the impact the additional development trips have on a congested part of the network and signalised junction which is discussed further within this response.

The impact on the Solent Road corridor is having to be considered holistically alongside this site, the Kingscroft Farm and Palk Road application, all which lead to existing trips on this already congested part of the network. Financial contributions are therefore necessary from these sites to cover the cost of these works. The Highway Authority welcome engagement on the cumulative impacts in order to ensure contribution requirements are fair and reasonable.

Site Access
The Highway Authority previously requested confirmation of the discussions held with the OWC team regarding the culvert and the implications the site access works may have on this. The applicant has been made aware that additional OWC consent may be required and is yet to confirm that the site access works have been deemed acceptable. In the absence of agreement with OWC on this matter the site access works would need to be a prior to commencement obligation to ensure that safe and suitable access into the site can be achieved.

The provision of a shared use crossing point across the site access has required amendments to the proposed refuge island. The applicant has therefore provided revised tracking for a 16.5m articulated vehicle and rigid truck navigating the site access as shown within drawing J32-5257-AT-A01 and J32-5257-AT-A02 respectively. It is unclear if the proposed use required articulated vehicles to access the site beyond the construction period. The applicant should provide clarity on this point.

The tracking speeds should be confirmed and should be undertaken at a realistic speed. Ideally, HGVs should be tracked at 10mph. Tracking speeds should be confirmed on all drawings.

All turning movements should be considered and these are not currently all provided and therefore the drawings should be revised. Additionally, the centre line should be placed on the drawing to ensure that movements can be contained within the correct side of the carriageway.

The TAA outlines the operation of the pedestrian gates however the interest of the Highway Authority lies with the vehicular gates. As previously requested, no commentary has been provided on the operation of the vehicular gates which should be outlined for consideration. The applicant should ensure that the provision of gates does not lead to any blocking back onto the highway or across the Bosmere medical practice access.

Internal Road Network
Pedestrian Routeing:
Drawing J32-5257-PS-016 confirms the termination of the footway on the western side of the access road adjacent to the zebra crossing. This is agreed. Visibility splays are still outstanding and should be provided in accordance with HCC TG3. Additionally, footway widths should be confirmed to ensure compliance with HCC TG10 (minimum width of 2.0m).

Speed Reducing Features:
No further commentary has been provided on speed reducing features throughout the internal access road. As previously raised, the 25.0m forward visibility provided is not agreed until appropriate methods to reduce the speeds along the access road have

been evidenced.

The virtual road humps previously shown were not considered to be an acceptable measure to reduce vehicle speeds sufficiently. It was requested that a gradual raise of the crossing to 50mm above the carriageway level and 1:20 ramps would be a satisfactory method to reduce speeds. Additional speed reducing measures will also be required past the gates into the offices before the bend to further reduce vehicle speeds. A variety of speed reduction measures should be used making vehicle users feel that they are in a space prioritised for pedestrians. The same method of the raised hump (without the addition of the crossing point could be utilised as an example). These matters are outstanding, and it is requested that further details are provided.

Bosmere Medical Centre Access:
The stop line on the northern side of the zebra crossing adjacent to the medical centre has been removed and 'Keep Clear' markings have been provided in its place as shown within drawing J32-5257-PS-016. This is agreed.

Internal HGV Use:
Drawing J32-5257-AT-A04 shows a 16.5m articulated vehicle manoeuvring within the proposed office car park. The manoeuvre relies on the whole of the eastern car park, with the TAA suggesting that this servicing is to be undertaken out of hours. The servicing of the offices via an articulated vehicle out of hours should be secured through an appropriate planning condition to ensure the movement can be undertaken. Under no circumstances should any reversing of HGVs occur on the carriageway.

Parking Provision
Parking Management: The applicant has included a measure within the travel plan under the responsibility of the travel plan co-ordinator to ensure that future employees of the site do not park within the Bosmere Medical Centre. The travel plan co-ordinator will ensure that all staff are aware that they should only park within the designated car park for this office space. This management measure is agreed.

EV Charging Provision:
It is noted that Havant Borough Council's Parking SPD does not provide specific EV charging requirements for office developments. The Highway Authority understand however, that other districts are suggesting 20% of the total parking provision to be equipped with EV chargers. The applicant is however proposing 20% (20 spaces) of the overall parking provision to be equipped with EV charging facilities which equates to this 20% proposed elsewhere across the County. The Parking Authority should confirm agreement to the level of provision.

The management of these spaces to ensure that they are appropriately utilised will be the responsibility of the applicant to ensure that no overspill parking occurs on the highway network. This should be considered in addition to the Travel Plan measures to ensure that staff parking only occurs within the office car park.

Junction Assessments The applicant has revised the modelling to include the following TEMPRO growth rates:

	AM Peak (08:00-09:00)	**PM Peak (17:00-18:00)**
2020-2026	1.0565	1.0547

The scenarios where future year flows were utilised have been revised which are as follows:

- 2026 future year
- 2026 future year + committed development
- 2026 future year + committed development + development

The following junctions which have been modelled by Junctions 9 and their associated maximum RFC values for the 2026 future year + committed development + development scenario are as follows:

Junction	**RFC**
Site Access/Solent Road	0.22
Solent Road / Brockhampton Road / Marples Road roundabout	0.54
Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout	0.64

In theory the junctions can operate within capacity for the 2026 future year + committed development + development scenario. Notwithstanding the above, improvements to be made to encourage sustainable travel and reduce the reliance on the private car are still necessary in order to ensure a genuine choice of modes is available on the corridor.

Solent Road/Park Road South signalised junction
The Solent Road / Park Road South signalised junction has been re-modelled using LinSig considering the revised TEMPRO growth rates. The TA notes that adjustments have been made to the signal timings in future year models with the development traffic to 'better balance' the traffic signal stages. Therefore, no results are shown identifying the impact of the development on the junction.

The Highway Authority previously raised the unacceptability of the amending the cycle times to up to 150 seconds as a form of mitigation, particularly considering that these signals are linked with the Havant SCOOT region which operates a maximum cycle time of 120 seconds and therefore all modelling should be consistent.

Increasing the cycle time to manipulate the result with the development is not acceptable. All previous comments raised on the model build still stand and therefore the modelling is not agreed.

Notwithstanding the above, the Highway Authority consider that no further modelling of this junction needs to be provided by the applicant. Despite amendments to the cycle time, the modelling results suggest that within the AM Peak period, the Degrees of Saturation exceeds 100% on the Park Road South, Park Road North and Solent Road arm suggesting that the junction is operating over theoretical design capacity.

Considering the complexities of this signalised junction and its relationship with the Havant SCOOT region, the Highway Authority consider it is appropriate for additional modelling considerations to be undertaken by the Highway Authority taking into account the cumulative impact of the 3 development sites.

The Highway Authority through the recent Transforming Cities Fund identified a capacity improvements scheme for Langstone Roundabout which sought to ease traffic through the Solent Road junction. This element of the scheme was to extend the northbound 3rd lane of the junction back to the Langstone roundabout exit. Increasing this left turn capacity from Park Road South means some additional green time can be applied to Solent Road. Similar extents of works have been implemented on the Park Road South approach to Langstone Roundabout recently costing a figure like that of

the identified sustainable travel works. The Highway Authority wish to determine through revised modelling work whether these improvements would be sufficient to mitigate the cumulative impacts should the Highway Authority wish to prioritise capacity improvements with any secured funding. Alternatively sustainable travel improvements rather than capacity improvements could be a more appropriate form of mitigation for this development in order to achieve modal shift in accordance with LTP4.

Given the accident history, proposed private car use from this development, distribution towards the signals and operational capacity of this junction, improvements to the sustainable travel infrastructure along the Solent Road corridor are vital and directly related to the development to mitigate against any additional vehicular trips through this junction. Therefore, a contribution towards the wider Solent Road works in addition to the S278 works being provided is key to offset the vehicular impact on this already constrained junction and provide an opportunity for modal shift.

Travel Plan
The Highway Authority have reviewed the revised travel plan and are satisfied that the required amendments have been made. This travel plan is therefore agreed and will be secured through a S106 agreement should this site receive planning consent along with approval and monitoring fee requirements.

Recommendations
Having regard to the above the Highway Authority require the further information requested before a formal recommendation can be made.

20/10/23

Thank you for your re-consultation on the above full planning application. Since the Highway Authority previously responded (09 September 2021), the applicant seeks consent only for the Portsmouth Water offices, with the industrial units removed from the development proposals. The footprint for the offices remains unchanged.

The submitted Transport Assessment (hereafter TA), dated 10 April 2023, to support this application consolidates the previous TA and TAA with reference to the industrial units removed. The Highway Authority have reviewed this revised TA and have the following comments to make.

Policy Status
The application site has been allocated in the adopted version of the Havant Borough Council Local Plan (Allocations) dated July 2014 under policy reference BD14 for 6,600m2 of new office floorspace. The adopted local plan also referred to the potential relocation of the Portsmouth Water offices from the current site (H14) to this site. The applicant is proposing to construct 1,848m2 of new office accommodation which falls within the allocation.

Sustainable Access
Walking and Cycling:
Following the previous response as referred to above, discussions have been undertaken with the applicant regarding the pedestrian and cycle infrastructure within the vicinity of the site. The Highway Authority do not agree with the assessment undertaken within the WCHAR submitted as part of the Transport Assessment Addendum in January 2022 as the routes considered do not holistically review the walking and cycling routes to the town centre

and the other facilities along Solent Road. The commentary within the TA also does not identify any deficits in the infrastructure within the vicinity of the site that would benefit from improvements to encourage travel by sustainable travel modes and reduce the reliance on the private car.

The Highway Authority have identified that there is no off-carriageway cycle route on Solent Road to connect in with National Cycle Network (NCN) Route 22, along Brockhampton Road or Park Road North. Solent Road is not conducive to on-carriageway cycling due to the traffic volumes and road widths and the Highway Authority have a desire to connect cyclists along Solent Road from the Harts Farm Way infrastructure via the Brockhampton Road / Marples Way roundabout to the Brockhampton Lane junction via off-carriageway shared use provision.

No reference has been made within this revised TA towards the inline crossing point along Brockhampton Lane to cater for those east/west movements for cyclists wishing to access the wider retail offer. It was requested that opportunities were also provided for cyclists to re-join the carriageway at this point along Brockhampton Lane and Solent Road or dismount to utilise the retail offer. Extensive discussions have been undertaken with the applicant regarding the provision of this, and a drawing had been circulated informally showing these works. It was agreed that this inline crossing provision would be provided as part of the s278 for the site access works, along with the provision of a 3.0m shared use path along the site frontage from the site access junction to connect in with this point. This drawing should be submitted formally for comment by the Highway Authority.

Since the previous response, further assessment work has since come forward identifying a scheme to improve the Solent Road / Brockhampton Road / Marples Way roundabout and provided a shared-use footway/cycleway along the northern side of Solent Road to connect in with the site access as part of the Kingscroft application. The applicant would be required to provide a proportionate contribution towards these works to mitigate the impact of development in addition to the S278 access works being provided.

Public Transport:
Whilst assessment work has been undertaken on the routes to both Bedhampton and Havant railway stations, it is understood that due to the frequency of the service, Havant station is likely to be more attractive for employees at this site. As noted above, improvements are to be sought as part of this application to improve the connectivity to Havant railway station through the provision of an inline crossing point along Brockhampton Lane.

Personal Injury Accidents (PIA)
The applicant has supplied PIA data for a 5-year period from 01 May 2016 - 30 April 2021 using Hampshire Constabulary records. The study area along the Solent Road corridor has previously been agreed with the Highway Authority. The data supplied is over 2-years out of date and is therefore unacceptable. The Highway Authority have undertaken an internal review for the most recent 5-year period (01 June 2018 – 31 May 2023) and note 14 PIA's (12 'slight' and 2 'serious') have occurred in the study area over this time.

There are a cluster of 10 accidents recorded in the vicinity of the Solent Road/B2149 Park Road South signalised junction. Whilst the collisions recorded are fairly mixed in nature, the Highway Authority are concerned that these have occurred possibly due to driver frustration considering the volume of traffic which travels through this junction. Matters regarding the accidents recorded and the operational safety of this junction are discussed further within this response.

One slight accident has been recorded at the site access junction however there doesn't not appear to be any particular trend with this accident that is likely to be exacerbated by the additional development.

Stage One Road Safety Audit (RSA1)

The applicant has undertaken a Stage One Road Safety Audit on the development proposals, supported by a designer's response. The auditor has raised several problems (2.1-4.2) which are referenced where appropriate throughout this response.
For clarity, audit problems 3.1 and 4.2 have been resolved and it is agreed that audit items 2.1 and 4.1 can be resolved at the detailed design stage.

Site Access

Access to the site is to remain unchanged following the omission of the industrial unit and is shown within drawing J32-5257-005 Rev E. As previously requested, the highway boundary has been overlayed on this drawing.

For clarity, the existing 'T' junction is to be extended to provide access to the development with the access road widened to accommodate vehicle movements. The existing access is to be modified through a larger kerb radius to accommodate HGV movements and the provision of a 2.0m wide refuge island supported with dropped kerbs and tactile paving. Access to the Bosmere Medical Centre is to remain unchanged. The applicant should widen the refuse island to support cycle movements to not prejudice against the future shared use aspirations along Solent Road.

As previously agreed, visibility splays of 2.4m X 90.0m are shown at the site access as shown within drawing J32-5257-005 Rev E, which are in excess of the requirements as laid out within HCC TG3 for a 30mph design speed and demonstrate appropriate visibility is achievable. The Highway Authority are satisfied that achievable visibility would be able to be provided when recorded speeds are required at the detailed design stage.

It is noted that audit problem 3.1 of the RSA1 requires vegetation to be cut back or replaced with low level vegetation to ensure visibility is maintained at all times. The designer's response notes trees are to be removed as part of the site access works to achieve the required visibility. Considering that this is to be ensured as part of the site access works it is agreed that this audit item is resolved. The applicant is reminded that any trees to be removed that fall within the highway boundary will require a S278 license for their removal and subject to a CAVAT payment in accordance with HCC TG15.

As requested previously, pedestrian visibility splays at the crossing access point as shown within drawing J32-5237-012 Rev A. These are agreed. Cyclist visibility splays in accordance with HCC TG3 should also be provided. The applicant has been made aware that vegetation maintenance will be required to ensure appropriate visibility can be maintained which was picked up within item 4.2 of the RSA1. Visibility will be suitably conditioned as part of any future planning consent to ensure that obstructions do not exceed 0.6m in height. Annotations have been provided on drawing J32-5257-012 Rev A to state that vegetation maintenance will be required. It is therefore agreed that this audit item has been resolved.

Additionally, the Highway Authority requested that the applicant engaged in conversations with the OWC team at HCC to discuss the culvert and the implications that the site access works may have on this. Additional OWC consent may be required to implement these works and the applicant should determine directly whether these works are agreeable. The Highway Authority are unclear as to whether these discussions have taken place and welcome sight of these comments.

Protective fencing is to be provided at the site access to prevent pedestrians inadvertently entering the culvert in response to item 4.1 of the RSA1. It is agreed that the extent of any mitigation required can be agreed at the detailed design stage.

HGV tracking at the site access has been shown within drawing J32-5257-003 Rev E and J32-5257-004 Rev E, which has been previously agreed with the Highway Authority. Whilst the industrial unit element has been removed from this application, the TA refers to the fact that occasional access may be required for larger vehicles outside of working hours. Should this be the case then HGV tracking should be provided internally to ensure this movement is achievable within the car parking layout.

The TA notes that the vehicular access into the site is to be gated. Further commentary is requested from the applicant regarding the operation of the gates. The applicant should ensure that the provision of gates does not lead to blocking back onto the highway. Confirmation is requested on this point.

Tracking for an 11.20m 'super large' refuse vehicle and 12.0m rigid truck within the office site area has been shown within drawing J32-5237-011 Rev A. The tracking is as previously agreed and is discussed further within this response.

Pedestrian Access and Routeing:
Concerns were raised within the previous response regarding the pedestrian connections into the site from Solent Road and the interaction with the zebra crossing adjacent to the medical centre access. The revised site layout as shown within drawing 23002-TP-003 Rev L shows tactile provision along the footway on the western side of the carriageway upon accessing the zebra crossing point, with the footway on the eastern side to tie in with the existing provision at the medical centre. As requested previously, this crossing point should be supported by HCC TG3 compliant visibility splays.

Considering the time in which additional information has been submitted to the Highway Authority, HCC TG10 has been released requiring all footways to be 2.0m. The widths of the proposed footways should be confirmed to ensure that these meet the required standards.

Following the removal of the industrial units it is unclear why the footway on the western side of the carriageway extends and leads to nowhere with no further opportunities to cross the access road. The footway should either terminate at the zebra crossing point or extended to tie in with the existing provision within the office car park.

Zebra Crossing into Portsmouth Water Offices:
In response to the previous comments, further consideration has been given to the interaction of the proposed zebra crossing and refuse/servicing movements. The tacking shown for the refuse and rigid truck requires manoeuvring over the crossing point to access the bin store and therefore, appropriate forward visibility should be provided to ensure that conflicts at the crossing point do not occur.

25.0m forward visibility in accordance with HCC TG3 for a 20mph design speed has been shown within drawing J32-5237-012 Rev A. The TA is misleading when suggesting that this has already been agreed with the Highway Authority. Whilst the forward visibility shown is acceptable in principle, there is limited evidence within the design to ensure that a 20mph design speed will be maintained considering the straight alignment of the access road. The virtual road humps as shown within drawing 23002-TP-003 Rev L are not considered to be an acceptable measure to reduce vehicle speeds sufficiently. It was requested that a gradual raise of the crossing to 50mm above the carriageway level and 1:20 ramps would be a satisfactory method to reduce speeds.

Additional speed reducing measures will also be required past the gates into the offices before the bend to further reduce vehicle speeds. A variety of speed reduction measures should be used making vehicle users feel that they are in a space prioritised for pedestrians. The same method of the raised hump (without the addition of the crossing point could be utilised as an example). These matters are outstanding, and it is requested that further details are provided.

Bosmere Medical Centre Access:
Whilst the Highway Authority do not have any safety concerns with the access proposals, the applicant has proposed additional measures to ensure that the access arrangement will not compromise the operation of the Bosmere Medical Centre. The TA states that the site layout has been revised to include a stop line on the northern side of the zebra crossing to further raise awareness of the medical centre access on the approach. The Highway Authority raised during direct discussions with the applicant that this arrangement is not supported as it could cause confusion to vehicle users and consequently compromise on highway safety. It is also not a TSRGD complaint use of a stop line. As requested, it appears that this has been removed from drawing 23002-TP-003 Rev L, and consistency should be provided between the drawings submitted and commentary within the TA.

Notwithstanding the above, the Highway Authority support the provision of the 'keep clear' markings to allow those accessing Bosmere Medical Centre a clear path, particularly during the network peak hours.

Parking Provision
The applicant is proposing 100 vehicle parking spaces for the offices. This exceeds the minimum requirement of 1 space per 30m2 of office space as laid out within Havant Borough Councils Parking SPD. The spaces are to measure 2.4m X 4.8m with accord with the minimum standards. No reference has been made to EV charging provision however this will be Havant Borough Council's responsibility as Local Parking Authority to raise this matter. EV charging space requirements should be confirmed with the Planning Authority as this may need additional space to accommodate the charging infrastructure and for safe operation.

The applicant has undertaken a parking accumulation analysis to support the car parking quantum. As previously stated, the Highway Authority are satisfied that the proposed parking provided will not lead to any overspill parking on the wider highway network, nor will it encourage any parking within the adjacent Bosmere Medical Centre car park. Notwithstanding the above, as per the previous response dated 09 September 2021, confirmation was requested as to how Portsmouth Water would ensure employees would not park in the medical centre car park. To date, no consideration has been given to this point.

Regarding cycle parking provision, the applicant is proposing 12 long stay and 4 short stay spaces to be provided within secure and sheltered storage with accords with standards.

The final decision regarding parking quantum is for Havant Borough Council to determine as the Local Parking Authority. The Highway Authority will be satisfied that appropriate parking provision has been provided subject to written confirmation from Havant Borough Council that this is agreed.

Trip Generation
For clarity, the agreed trip rates for the Portsmouth Waer offices have been based on the TRICS database in conjunction with Portsmouth Water staff 'Travel to Work' data. It was assumed that due to the locality of the office relocation, staff are to travel to work as per existing arrangements. The modal split of vehicle drivers is 81.3%. The previously agreed trip rates are as follows:

	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arr.	Dept.	Total	Arr.	Dept.	Total
Trip Generation	52	4	56	8	50	58

Whilst the removal of the industrial units will lead to a reduction in trips generated by the development, this only leads to a reduction of 15 and 11 vehicle trips in the AM and PM peaks respectively. The trips generated by the office use still contributes 79% in the AM peak and 85% in the PM peak of the previously agreed trip rates.

Given the percentage of people (81.3%) that drive to work, it is even more imperative that improvements are made towards the sustainable infrastructure improvements to encourage travel to work via sustainable travel modes and offset the impact of the additional vehicular trips along the Solent Road corridor network.

Multimodal trip generation:
The applicant has used the same method for vehicular trip generation to analyse the proposed multimodal trip generation. The applicant will be providing a proportionate contribution towards walking and cycling improvements along the Solent Road corridor to accommodate the 10 walking and cycling trips (assuming that access to bus and rail services would be or should be on foot or cycle given the location of these facilities) in the AM and PM peaks and encourage modal shift for those 81.3% of employees that currently utilise the private car to travel to work.

Traffic Distribution/Assignment

For clarity the agreed trip distribution is as follows:
- North on Brockhampton Road – 12%;
- East on Solent Road – 46%; and
- South on Brockhampton Road – 42%

Baseline Traffic Data Collection:
Methods of collecting baseline traffic data for assessment were previously agreed with the Highway Authority.

Committed Developments:
As previously requested by the Highway Authority the Forty Acres Farm development (planning reference APP/18/00450) has been included as a committed development. Turning moments from this development have been added to the network for the 2023 and 2026 future year scenarios.

It is noted that the committed developments do not include the Palk Road (APP/22/01231) and Kingscroft Farm (APP/22/00669) developments which have become live planning applications whilst this application has been dormant and following agreement of the traffic distribution scope. These development sites have however modelled the Solent Road / Brockhampton Road / Marples Way roundabout and the Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout. Due to the trips from these sites dispersing across a number of routes they have not been required to consider the Solent Road / Park Road South signalised junction. The assessment of the wider junction network within the Palk Road and Kingscroft applications would utilise TEMPRO growth rates which would allow for growth as a result of this committed development through its allocation in the Local

Plan. It is therefore considered that the Palk Road and Kingscroft development sites will be considering this development within their assessment work appropriately and it would be unnecessary for this application to consider these schemes through revised assessment parameters.

Traffic Growth:
The applicant has utilised the following TEMPRO growth rates for the Havant 014 Super Output Area within the junction modelling:

Growth Factor	AM Peak (08:00-09:00)	PM Peak (17:00-18:00)
2020-2023	1.029185	1.027984
2020-2026	1.048028	1.046421

Whilst reference to the TEMPRO growth rates notes 2023 and 2026, commentary within the TA appears to suggest that growth rates have been considered for 2023 and 2025. The Highway Authority have reviewed the previously submitted TAA (dated October 2021) and understand that the 2020-2026 TEMPRO growth rates should be 1.0565 and 1.0547 or the AM and PM peaks respectively, with the growth rates provided within this TA consistent with those previously provided for 2020-2025. It is therefore requested that the correct growth rates are applied to accurately assess the traffic growth.

Junction Assessments
The scope of the modelling has been previously agreed with the Highway Authority which is as follows:

- Site Access / Solent Road;
- Solent Road / Brockhampton Road / Marples Way roundabout;
- Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout; and
- Solent Road / Park Road South signalised junction

The agreed scenarios to be modelled are as follows:

- 2020 baseline (with Covid-19 adjustment factor);

2023 baseline + committed development;
- 2023 baseline + committed development + development;
- 2026 baseline + committed development; and
- 2026 baseline + committed development + development

All junctions have been modelled with Junctions 9, except for the Solent Road / Park Road South signalised junction which has been modelled with LinSig. Whilst the modelling has been reviewed at this stage, it is requested that modelling is re-run utilising the correct TEMPRO growth rates for 2026 to ensure that the full impact at these junctions have been considered appropriately. Notwithstanding the above, the modelling results have been reviewed and the Highway Authority have the following comments to make.

The maximum RFC values for the junctions modelled via Junctions 9 for the 2026 baseline + committed development + development scenario are as follows:

Junction	RFC

Site Access / Solent Road junction	0.21
Solent Road / Rockhampton Road / Marples Way roundabout	0.54
Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout	0.63

Whilst in theory the above junctions are able to operate within capacity for the 2026 baseline + committed development + development scenario, this does not negate the need for the identified improvements to the sustainable travel infrastructure within this response to reduce the reliance on the private car. The RFC values at the site access that is shared with the Bosmere Medical Centre is well under capacity in both the AM and PM peak periods, showing that the proposed development should not hinder emergency access, and access to the medical centre to both staff and patients.

Solent Road / Park Road South signalised junction:
The ITS team have reviewed the junction modelling at this signalised junction and are content that the model structure is generally appropriate; however, the Highway Authority wish to make the following comments on the model build.

In previous models the cycle time remained consistent at 120 seconds across all modelled scenarios. The new model 'with dev' scenarios has increased the cycle time to 150 seconds which is not an appropriate form of mitigation. 120 seconds is considered the maximum cycle time during which a pedestrian is prepared to wait for a green light to cross, particularly where a staggered crossing is present. An additional 30 second delay is unacceptable as would be detrimental to pedestrians and may result in unsafe pedestrian movements against the red pedestrian signal. Additionally, the junction forms part of the Havant SCOOT region which operates a maximum cycle time of 120 seconds and therefore this model cycle time should be consistent.

The Stage 5 is run in every cycle in the modelling whereas on site it will be demanded dependent phase I (Park Road Southbound exit ped). This is representative of the AM peak which has a high pedestrian demand. In the PM peak the demand level for crossing is likely to be lower and two cycles should be modelled with stage 5 appearing only once.

Pedestrian Phase G runs for a significant length of time and it is reasonably unlikely a pedestrian crossing would extend through the inter-green past the traffic-to-traffic interstage. The modelling has the inter-green from Phase G delaying phase D by 1 second which seems unlikely. It is suggested that Phase G is removed from stage 2 in this instance.

Finally, it would be helpful for any future revised model submissions to have the scenario name replicate the flow group scenario as this makes it easier to review the model.

Given the accident history, private car use, proposed distribution and operational capacity of this junction, improvements to the sustainable travel infrastructure along the Solent Road corridor are considered vital and directly related to the development to mitigate against any additional vehicular trips through this junction. This is only like to be exacerbated following the amendments to the model build and use of the correct TEMPRO growth rates.

Harts Farm Way / A27 'teardrop' junction:
The Highway Authority recommended that the applicant engaged in discussions with National Highways regarding the impact of the development traffic on the A27 'tear drops' arrangement. Whilst it is acknowledged that 0.58% additional trips in 2026 for

both the AM and PM peaks are to travel through this junction, the Highway Authority needed to be satisfied that the addition of the development traffic would still allow the junction to operate satisfactorily.

The Highway Authority understand that National Highways have no concerns with the ongoing operation of the junction considering the additional development traffic. This is further confirmed with a no objections response provided by National Highways on 21st October 2021. Considering as this junction falls within the jurisdiction of National Highways, the Highway Authority are satisfied that further assessment work at this junction is not required.

Travel Plan

This travel plan has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of travel plans – *A Guide to Development Related Travel Plans*. Whilst the quality of this travel plan is generally good, some amendments are required before it can be approved.

Introduction (Section 1):

The end occupiers view on travel planning/sustainable travel should be included. If they don't have such policies, a statement of support from Portsmouth Water for the contents of the travel plan should be included.

A summary of key policies related to travel planning should also be included (e.g. NPPF, HCC's draft LTP4, local parking standards, among others).

Development details (Section 2):

Walking and cycling isochrone maps should be included in this section, or as an appendix if necessary.

Travel plan strategy (Section 5):

Contact details of the travel plan coordinator should be provided to HCC when available.

A cost estimate for the travel plan coordinator should be given. This should include the number of hours expected to work on the travel plan per year, and an hourly rate.

Monitoring (Section 6):

Snapshot surveys should be conducted in years where full surveys are not carried out.

A minimum response rate of 35% for surveys should be aimed for. Measures to encourage survey completion (e.g. entry into a prize draw for shopping vouchers) should be included.

An alternative method of survey should be included (e.g. automatic traffic counts/TRICS surveys) if the survey response rate falls noticeably below 35%.

Measures and initiatives (Section 8):

The following measures should be considered for inclusion in the travel plan:

- The provision of showers and changing facilities with lockers
- On site security
- Bike service stations or bike repair equipment to be provided to staff
- Formation of a bicycle users group (BUG)
- Introduction of the cycle to work scheme, or a loan scheme for cycles
- The travel plan coordinator to collaborate with local public transport providers to improve services, negotiate discounts, and trial initiatives.
- Employee loans for public transport season tickets
- The provision of priority car parking spaces for car sharers

- The use of a dedicated website or social media to advertise the travel plan
- The travel plan coordinator to offer personalised journey planning

Action plan (Section 9):
The action plan in Table 9.1 must include cost estimates for each measure, including a cost estimate for the travel plan coordinator. This information is used to determine the value of the travel plan cash deposit, and the travel plan cannot be approved without this information.

Delivery and enforcement:
A section should be included which lays out the following:
- That the travel plan will be secured via a Section 106 agreement
- A commitment to pay HCC's evaluation and monitoring fees
- Commitment to pay a travel plan cash deposit equal in value to the cost of the action plan (including TPC) plus a surety of 10%.

Recommendations:
This travel plan will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site.

Recommendations
Whilst the majority of matters regarding the site access and internal layout are agreed, further information is requested from the applicant regarding the traffic impact for the proposed development and sustainable travel measures as mitigation towards any additional trips generated by the development particularly at the Solent Road / Park Road South junction. These improvements to the infrastructure are key to ensure that the development can be regarded as sustainable to offset any additional vehicular trips. I trust that the above is clear but please do not hesitate to contact Sophie Osborne on the above number/email should you require any further information.

The Highway Authority have considered the information provided within the Transport Assessment (hereafter, TA) and the comments regarding the proposed development are set out below.

Policy Status

The application site has been allocated in the adopted version of the Havant Borough Local Plan (Allocations), dated July 2014, and also features as an allocation in the emerging local plan. The applicant is proposing the use of 4,048m2 of floorspace in this site. The Local Plan also identifies the potential relocation of Portsmouth Water (hereafter, PW) offices from their current site (H14) to this proposed new site (BD14). The TA, which supports this application, provides a summary of the relevant transport planning policies.

Site Location

The proposed site is situated in a primarily industrial and retail area, located opposite Solent Trade Park, with Bosmere Medical Centre neighbouring the site. The site is accessed via Solent Road, which also provides an access to Bosmere Medical Centre. The proposed development site is currently on undeveloped land.

Sustainable Access

Walking and Cycling:

Surrounding the site there is a network of pedestrian and cycle routes along key highway links providing connectivity to local bus stops, Havant and Bedhampton train stations and nearby residential areas. Pedestrian access to the site will be retained, keeping the existing footway along the western kerb to the site as well as keeping the existing informal zebra crossing. The pedestrian footway is proposed to continue along the eastern kerb line of the access providing access for staff to the office building. The termination point of this path doesn't tie into the proposed extended zebra crossing. As this connection point provides the onward route out of the site to Solent Road this arrangement should be amended to provide a suitable waiting area and tactile paving provision for the crossing. As the design stands the arrangement would be unsuitable to cater for those with visual or mobility impairments. Additionally, the site is proposed to have a gated pedestrian access to allow secure access for employees.

Furthermore, along Solent Road, there are lit footways on both sides of the carriageway and at the signalised junction between the Tesco Extra and Park Road South. There are further signalised and unsignalised crossing points from the proposed site to the station.

Although the applicant has undertaken a pedestrian and cycling audit on Solent Road, the Highway Authority require an audit of the wider pedestrian and cycle network, in particular the links to Bedhampton and Havant rail station. This audit should be fully supported by a WCHAR assessment as per Hampshire County Council's Technical Guidance Note (TG19).

Buses:

The site is serviced by frequent bus services (30, 31, 700) with the nearest bus stops located 500m east of the site on Park Road South. These bus stops provide a shelter, seating, and timetable, increasing the attractiveness and convenience of travel via bus. The Xelabus service (74) also runs with request stops provided adjacent to the site access on Solent Road. Despite not being mentioned in the TA, Havant Bus Station is located circa 0.8km away from the site with further frequent bus services (21, 23, 27, 37, 39) to the surrounding area.

Rail:

The site is well located in relation to Bedhampton and Havant train stations. Bedhampton station is located circa 900m NW of the site, with Havant station being located circa 1.0km NE. Both are accessible in under 15 mins walking and 4 mins cycling. Havant and Bedhampton train stations offer frequent services to Portsmouth Harbour, Southampton Central, Brighton and London.

Personal Injury Accidents (PIA)

In the TA, PIA data has been provided via Crashmap Pro, however, the Highway Authority do not accept the use of Crashmap data. The applicant is required to gather the most recent 5-year PIA data using Hampshire Constabulary records. As demonstrated in the current PIA analysis in the TA, the Highway Authority would expect the search area to include:

- Site access / Solent Road
- Solent Road / Brockhampton Road / Marples Way roundabout
- Solent Road / Tesco Access

- Solent Road / Park Road South signalised junction

Site Access

The site is proposed to share the current access with Bosmere Medical Centre via Solent Road. Solent Road is a two-way single carriageway subject to a 30mph speed limit. The proposed development will upgrade the existing access, whilst retaining access to Bosmere Medical Centre. In order to accommodate turning manoeuvres of HGVs accessing the development, the existing access will be modified to provide a wider bellmouth with larger kerb radii. In addition, the site access will be provided with a 2.0m wide pedestrian refuge island, dropped kerbs and tactile paving to provide safe crossing facilities for pedestrians considering the width of the proposed bellmouth. The applicant is required to provide pedestrian visibility splays at this crossing point due to the crossing being inset at the junction. Additionally, in order to maintain these visibility splays, vegetation should be cut back behind the splay and maintained, preferably to a minimum of 1m as laid out in Hampshire County Council Technical Guidance TG3 (3.3.4). Further guidance is also laid out in Hampshire County Council Technical Guidance TG15.

The site access provides visibility splays of 2.4m X 90m. The Highway Authority accepts this given that the splays are in excess of the requirements for the posted 30mph speed limit.

The applicant states in the designer's response to the Stage 1 Road Safety Audit Report that in order to maintain the visibility splay at this access point, trees will be removed. However, the Highway Authority require an updated diagram of the access which overlays the Highway Boundary. The applicant should be made aware trees located within the highway boundary, will require a S278 license for their removal and will be subject to a CAVAT assessment where the Highway Authority will seek payment to this value to mitigate the loss of the asset and facilitate replacement tree planting as per TG15. Regarding the culvert at the western side of the access, conversations should be held with HCC OWC team to discuss the culvert and the implications that the site access may have on this. Additional OWC consent may be required to construct the access works and the applicant should determine directly whether this is likely to be agreeable.

In terms of swept path analysis, further clarification is needed with some aspects of the design. Drawing J32-5257-006 and J32-5257-010 shows upon accessing the industrial units, the HGV is shown to cross the pavement in order to meet their destination. Thus, further clarification is required on the pedestrian routing to ensure the safety of pedestrians on private land. Furthermore, drawing J32-5257-011 shows that when the refuse vehicle and rigid truck manoeuvres they overrun the pedestrian crossing in order to complete their manoeuvre. The applicant will be required to show visibility splays at this crossing point to ensure that pedestrians and vehicles will be able to see each other. If visibility splays are not adequate, then the applicant should explore the scope to extend the footway provision and move the crossing further east so that vehicles reversing are not reversing over the pedestrian crossing.

Parking Provision

The applicant proposes that the parking provision for the development proposal has been designed in accordance with Havant Borough Council's Parking Supplementary Planning Document, dated July 2016. In total, the applicant proposes 100 spaces for the office and 39 car parking spaces for the industrial site, measuring a minimum of 2.4m X 4.8m. Furthermore, the applicant proposes 12 long-stay and 4 short-stay cycle

spaces in secure and sheltered locations for the offices, and 2 Sheffield hoops (4 cycle spaces) per industrial unit that are provided internally due to the land use.

The Highway Authority are satisfied that parking is to be provided in accordance with the relevant parking standards. The applicant should be made aware that ultimately the final decision regarding parking is with Havant Borough Council as the Parking Authority. Thus, the applicant should secure confirmation from HBC about whether the proposed parking provision will be accepted or not.

Internal Road Network

Whilst it is acknowledged that, based on adopted parking standards, there is considered adequate parking for the proposed development, the applicant should outline how they will ensure that employees of the Portsmouth Water site will not park in the car park for the medical practice, to ensure that the existing provision remains unaffected by the proposed development.

Trip Generation
Through the pre-application consultation, it was agreed between the applicant and the Highway Authority that the applicant should send out questionnaires to Portsmouth Water employees to gather travel to work data to use in conjunction with calculated trip rates. Given the locality of the relocation, the applicant found that most staff would continue to travel to work as per their existing arrangements. Using the responses from the data in conjunction with the TRICS assessment, the following vehicle trip rates have been provided for the proposed development:

Mode	AM (08:00-9:00) Peak Hour Period			PM (17:00-18:00) Peak Hour Period		
Vehicle Driver	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
	52	4	56	8	50	58

Furthermore, during pre-application discussions, the Highway Authority did not accept that there would only be 1 OGV trip per day due to the size of the industrial units (2,200m2), this has since been updated to reflect 4 OGV trips per day (3 AM, 1 PM). Additionally, the applicant was asked to provide LGV trip rates which have since been provided in the TA. The Highway Authority are satisfied that 2 LGV (2AM, 0PM) trips per day will not have a detrimental impact on the wider highway network.

Traffic Distribution/Assignment

During pre-application discussions, the Highway Authority requested further evidence supporting the proposed traffic distribution, with the applicant being asked to model further junctions (Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout; Harts Farm Way / A27 ‘teardrop’ junction) inclusive of the junctions that had previously been modelled. This has since been completed in the TA and the accepted distribution is therefore as follows:

- North on Brockhampton Road – 12%
- East on Solent Road – 46%
- South on Brockhampton Road – 42%

The TA sets out that it is not necessary for the applicant to model the Harts Farm Way / A27 'teardrop' junction due to a very small percentage of traffic (>1%) using this junction. However, this is not the case as a significant amount of traffic both arrives and departs via Harts Farm way to the site. The Highway Authority therefore require an understanding of the impact to Harts Farm Way as a result of these additional movements. The HE should also be consulted on whether they have modelling requirements for the junction.

Additionally, as requested by the Highway Authority during the pre-app, the applicant has provided further details regarding traffic distribution. Due to 46% of traffic expected to head east on Solent Road, there are operational capacity concerns with the Solent Road / Park Road South signalised junction which will be highlighted later in this response.

Junction Assessments

Following pre-application, the applicant was asked to model the junction impact of the following:

- Site Access / Solent Road
- Solent Road / Brockhampton Way / Marples Way roundabout
- Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout

Over the following traffic flow scenarios during the AM and PM peak hours (08:00-09:00 and 17:00-18:00 respectively):

- 2020 baseline (with COVID-19 adjustment factor)
- 2023 baseline (inclusive of committed development)
- 2025 baseline (inclusive of development)
- 2023 baseline + development
- 2025 baseline + development

In addition to what has already been modelled, the Highway Authority require further modelling of the Solent Road / Park Road South signalised junction. The Highway Authority have concerns as to whether the proposed site will cause this junction to be over capacity due to a predicted 46% of traffic using this junction on their commute to work. Furthermore, the Highway Authority require modelling up until 2026 at all previous junctions that have been modelled in addition to the Solent Road / Park Road South signalised junction. A detailed review of the junction modelling shall be provided once the modelling has been updated.

An approved model for the Solent Road/Park Road South junction is available to purchase from the Highway Authority at a cost to the applicant. Further discussions should be held with the Highway Authority to arrange for the modelling of the aforementioned junction.

Travel Plan

This Framework Travel Plan has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of Travel Plans – "A Guide to Development Related Travel Plans". Whilst the quality of this Travel Plan is generally good, it still requires some amendments before it can be approved.

Background:

The Travel Plan references the National Planning Policy Framework and the Planning Policy Practice Guidance 'Travel Plans, Transport Assessments and Statements (20140. However, there are a number of important policies and guidelines missing from this section. The following should be added in to the Travel Plan:

- CIHT's 'Guidelines for Providing Journeys on Foot' (2000)
- CIHT's 'Buses in Urban Developments' (2018)
- DfT's Manual for Streets (2007)
- Hampshire's Local Transport Plan 2011-2031 (2013)
- Hampshire County Council's 'A Guide to Development Related Travel Plans' (2009)
- Hampshire County Council's Parking Standards
- LPA Parking SPD (where applicable)
- LPA Clean Air Policy (where applicable)
- LPA Local Plan (where applicable)
- LPA Electric Vehicle SPD (where applicable)
- Neighbourhood Plans (where applicable)

Consultation and Partnerships:

The Travel Plan should contain evidence of preliminary liaisons with local cycle shops and public transport operators to scope the possibility of arranging for discounts on equipment and services respectively. These communications can then form the basis for further negotiations between these companies and the Travel Plan Coordinator (TPC).

Measures:
A number of additional measures should be considered for inclusion into the Travel Plan;

Walking:

- Showers, changing facilities and lockers for storing clothes

Cycling:

- Showers, changing facilities and lockers
- Formation of a bicycle users group (BUG)
- Provision of an interest free loan for a bike
- Pool bikes and mileage allowances for cycle use
- Bike Service Stations (staff and visitors)

Public Transport:

- Collaboration with local public transport providers to improve services, negotiate discounts and trial initiatives
- Works buses / shuttle buses
- Employers can consider provision of interest free loans to purchase season tickets (up to £5000 can be provided without tax implications)
- Guaranteed ride home for staff in emergency situations
- Introduce "collection from station" service for visitors

Marketing and promotion:

- Advertising TP to staff through recruitment – e.g. how to get there for interview and on the website

Action Plan:
An Action Plan is included within the Framework Travel Plan. Unfortunately, it is not detailed enough and should be revised to include details each measure to be conducted as part of the Travel Plan (including resources to be allocated to the TPC role). The action plan should be similar in layout to the example table below. A cost estimate for these items must be included which is used to approximate a Travel Plan Cash Deposit (see "Delivery and Enforcement).

Objective	Action	Start Date	Due Date	Responsibility	Mode affected	Cost Estimate

Table 2 – Example Action Plan

Roles and Responsibilities:
The Travel Plan states that a Travel Plan Coordinator (TPC) will be identified in the future. More detail should be provided in relation to the following matters;

- Number of hours to be spent on the Travel Plan per week
- Number of weeks per year to be worked on
- The cost per hour of the Travel Plan coordinator
- Total cost of the TPC

Monitoring:
A minimum 35% response rate must be attained in order for travel questionnaire surveys to be considered statistically significant. If this cannot be achieved, then discussions should be had with HCC regarding carrying out TRICS SAM or ATC surveys. There should also be a commitment to undertake Snapshot surveys in Years 2 and 4 to ensure that the Travel Plan is on track.

Delivery and Enforcement:
There should be a reference in the document to a means for enforcing the Travel Plan. Typically, this is accomplished through a Section 106 agreement.
A commitment to pay HCC's monitoring and approval fees should be included in the Travel Plan. Sanctions should be in place in the event that the commitments stated in the Travel Plan are not met. This includes any remedial measures which could be implemented if the targets are not met, e.g., personalised transport planning.

Conclusion:
The Travel Plan will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site. If you have any questions, please do not hesitate to contact Debbi Smith by email on debbi.smith3@hants.gov.uk.

Recommendations

The Highway Authority require the following information before any formal recommendations can be made:

- Pedestrian and cycle audit of the wider pedestrian and cycle network which should be fully supported by a WCHAR assessment (HCC TG19);
- Analysis of the most recent 5-year PIA data using Hampshire Constabulary records;
- Visibility splays for the pedestrian crossing at the site access and outside of the PW offices;
- Amendments to the internal footway provision on the eastern side to accommodate the

zebra crossing appropriately into the revised layout.

- Provision of an updated site access diagram with the inclusion of the highway boundary to understand whether trees that are proposed are located within the highway;
- Further clarification regarding the pedestrian movements inside the site;
- Explore the scope of moving the pedestrian crossing outside the PW offices further east if visibility splays are not adequate; An outline as to how the applicant will prevent PW employees from parking in the car park for the medical practice;
- Modelling of the Solent Road / Park Road South signalised junction;
- Modelling of all junctions mentioned in the TA and the Solent Road / Park Road South signalised junction up until 2026; and
- Amendments to the Travel Plan.

I trust that the above is clear, but please do not hesitate to contact Sophie Osborne on the above number/email should you require any further information.

Original Comments:

9.9.21

Thank you for the opportunity to comment on the planning application for the above site. The Highway Authority have considered the information provided within the Transport Assessment (hereafter, TA) and the comments regarding the proposed development are set out below.

Policy Status

The application site has been allocated in the adopted version of the Havant Borough Local Plan (Allocations), dated July 2014, and also features as an allocation in the emerging local plan. The applicant is proposing the use of 4,048m2 of floorspace in this site. The Local Plan also identifies the potential relocation of Portsmouth Water (hereafter, PW) offices from their current site (H14) to this proposed new site (BD14). The TA, which supports this application, provides a summary of the relevant transport planning policies.

Site Location

The proposed site is situated in a primarily industrial and retail area, located opposite Solent Trade Park, with Bosmere Medical Centre neighbouring the site. The site is accessed via Solent Road, which also provides an access to Bosmere Medical Centre. The proposed development site is currently on undeveloped land.

Sustainable Access

Walking and Cycling:

Surrounding the site there is a network of pedestrian and cycle routes along key highway links providing connectivity to local bus stops, Havant and Bedhampton train stations and nearby residential areas. Pedestrian access to the site will be retained, keeping the existing footway along the western kerb to the site as well as keeping the existing informal zebra crossing. The pedestrian footway is proposed to continue along the eastern kerb line of the access providing access for staff to the office building. The termination point of this path doesn't tie into the proposed extended zebra crossing. As this connection point provides the onward route out of the site to Solent Road this arrangement should be amended to provide a suitable waiting area and tactile paving provision for the crossing. As the design stands the

arrangement would be unsuitable to cater for those with visual or mobility impairments. Additionally, the site is proposed to have a gated pedestrian access to allow secure access for employees.

Furthermore, along Solent Road, there are lit footways on both sides of the carriageway and at the signalised junction between the Tesco Extra and Park Road South. There are further signalised and unsignalised crossing points from the proposed site to the station.

Although the applicant has undertaken a pedestrian and cycling audit on Solent Road, the Highway Authority require an audit of the wider pedestrian and cycle network, in particular the links to Bedhampton and Havant rail station. This audit should be fully supported by a WCHAR assessment as per Hampshire County Council's Technical Guidance Note (TG19).

Buses:

The site is serviced by frequent bus services (30, 31, 700) with the nearest bus stops located 500m east of the site on Park Road South. These bus stops provide a shelter, seating, and timetable, increasing the attractiveness and convenience of travel via bus. The Xelabus service (74) also runs with request stops provided adjacent to the site access on Solent Road. Despite not being mentioned in the TA, Havant Bus Station is located circa 0.8km away from the site with further frequent bus services (21, 23, 27, 37, 39) to the surrounding area.

Rail:

The site is well located in relation to Bedhampton and Havant train stations. Bedhampton station is located circa 900m NW of the site, with Havant station being located circa 1.0km NE. Both are accessible in under 15 mins walking and 4 mins cycling. Havant and Bedhampton train stations offer frequent services to Portsmouth Harbour, Southampton Central, Brighton and London.

Personal Injury Accidents (PIA)

In the TA, PIA data has been provided via Crashmap Pro, however, the Highway Authority do not accept the use of Crashmap data. The applicant is required to gather the most recent 5-year PIA data using Hampshire Constabulary records. As demonstrated in the current PIA analysis in the TA, the Highway Authority would expect the search area to include:

- Site access / Solent Road
- Solent Road / Brockhampton Road / Marples Way roundabout
- Solent Road / Tesco Access
- Solent Road / Park Road South signalised junction

Site Access

The site is proposed to share the current access with Bosmere Medical Centre via Solent Road. Solent Road is a two-way single carriageway subject to a 30mph speed limit. The proposed development will upgrade the existing access, whilst retaining access to Bosmere Medical Centre. In order to accommodate turning manoeuvres of HGVs accessing the development, the existing access will be modified to provide a wider bellmouth with larger kerb radii. In addition, the site access will be provided with a 2.0m wide pedestrian refuge island, dropped kerbs and tactile paving to provide safe crossing facilities for pedestrians considering the width of the proposed bellmouth. The applicant is required to provide pedestrian visibility splays at this crossing point due to the crossing being inset at the

junction. Additionally, in order to maintain these visibility splays, vegetation should be cut back behind the splay and maintained, preferably to a minimum of 1m as laid out in Hampshire County Council Technical Guidance TG3 (3.3.4). Further guidance is also laid out in Hampshire County Council Technical Guidance TG15.

The site access provides visibility splays of 2.4m X 90m. The Highway Authority accepts this given that the splays are in excess of the requirements for the posted 30mph speed limit.

The applicant states in the designer's response to the Stage 1 Road Safety Audit Report that in order to maintain the visibility splay at this access point, trees will be removed. However, the Highway Authority require an updated diagram of the access
which overlays the Highway Boundary. The applicant should be made aware trees located within the highway boundary, will require a S278 license for their removal and will be subject to a CAVAT assessment where the Highway Authority will seek payment to this value to mitigate the loss of the asset and facilitate replacement tree planting as per TG15. Regarding the culvert at the western side of the access, conversations should be held with HCC OWC team to discuss the culvert and the implications that the site access may have on this. Additional OWC consent may be required to construct the access works and the applicant should determine directly whether this is likely to be agreeable.

In terms of swept path analysis, further clarification is needed with some aspects of the design. Drawing J32-5257-006 and J32-5257-010 shows upon accessing the industrial units, the HGV is shown to cross the pavement in order to meet their destination. Thus, further clarification is required on the pedestrian routing to ensure the safety of pedestrians on private land. Furthermore, drawing J32-5257-011 shows that when the refuse vehicle and rigid truck manoeuvres they overrun the pedestrian crossing in order to complete their manoeuvre. The applicant will be required to show visibility splays at this crossing point to ensure that pedestrians and vehicles will be able to see each other. If visibility splays are not adequate, then the applicant should explore the scope to extend the footway provision and move the crossing further east so that vehicles reversing are not reversing over the pedestrian crossing.

Parking Provision

The applicant proposes that the parking provision for the development proposal has been designed in accordance with Havant Borough Council's Parking Supplementary Planning Document, dated July 2016. In total, the applicant proposes 100 spaces for the office and 39 car parking spaces for the industrial site, measuring a minimum of 2.4m X 4.8m. Furthermore, the applicant proposes 12 long-stay and 4 short-stay cycle spaces in secure and sheltered locations for the offices, and 2 Sheffield hoops (4 cycle spaces) per industrial unit that are provided internally due to the land use.

The Highway Authority are satisfied that parking is to be provided in accordance with the relevant parking standards. The applicant should be made aware that ultimately the final decision regarding parking is with Havant Borough Council as the Parking Authority. Thus, the applicant should secure confirmation from HBC about whether the proposed parking provision will be accepted or not.

Internal Road Network

Whilst it is acknowledged that, based on adopted parking standards, there is considered adequate parking for the proposed development, the applicant should outline how they will ensure that employees of the Portsmouth Water site will not park in the car park for the medical practice, to ensure that the existing provision remains unaffected by the proposed development.

Trip Generation

Through the pre-application consultation, it was agreed between the applicant and the Highway Authority that the applicant should send out questionnaires to Portsmouth Water employees to gather travel to work data to use in conjunction with calculated trip rates. Given the locality of the relocation, the applicant found that most staff would continue to travel to work as per their existing arrangements. Using the responses from the data in conjunction with the TRICS assessment, the following vehicle trip rates have been provided for the proposed development:

Mode	AM (08:00-09:00) Peak Hour Period			PM (17:00-18:00) Peak Hour Period		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Vehicle Driver	52	4	56	8	50	58

Furthermore, during pre-application discussions, the Highway Authority did not accept that there would only be 1 OGV trip per day due to the size of the industrial units (2,200m2), this has since been updated to reflect 4 OGV trips per day (3 AM, 1 PM). Additionally, the applicant was asked to provide LGV trip rates which have since been provided in the TA. The Highway Authority are satisfied that 2 LGV (2AM, 0PM) trips per day will not have a detrimental impact on the wider highway network.

Traffic Distribution/Assignment

During pre-application discussions, the Highway Authority requested further evidence supporting the proposed traffic distribution, with the applicant being asked to model further junctions (Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout; Harts Farm Way / A27 'teardrop' junction) inclusive of the junctions that had previously been modelled. This has since been completed in the TA and the accepted distribution is therefore as follows:

- North on Brockhampton Road – 12%

- East on Solent Road – 46%

- South on Brockhampton Road – 42%

The TA sets out that it is not necessary for the applicant to model the Harts Farm Way / A27 'teardrop' junction due to a very small percentage of traffic (>1%) using this junction. However, this is not the case as a significant amount of traffic both arrives and departs via Harts Farm way to the site. The Highway Authority therefore require an understanding of the impact to Harts Farm Way as a result of these additional movements. The HE should also be consulted on whether they have modelling requirements for the junction.

Additionally, as requested by the Highway Authority during the pre-app, the applicant has provided further details regarding traffic distribution. Due to 46% of traffic expected to head east on Solent Road, there are operational capacity concerns with the Solent Road / Park Road South signalised junction which will be highlighted later in this response.

Junction Assessments

Following pre-application, the applicant was asked to model the junction impact of the following:

- Site Access / Solent Road
- Solent Road / Brockhampton Way / Marples Way roundabout
- Brockhampton Road / Harts Farm Way / Brookside Road / Southmoor Lane roundabout

Over the following traffic flow scenarios during the AM and PM peak hours (08:00-09:00 and 17:00-18:00 respectively):

- 2020 baseline (with COVID-19 adjustment factor)
- 2023 baseline (inclusive of committed development)
- 2025 baseline (inclusive of development)
- 2023 baseline + development
- 2025 baseline + development

In addition to what has already been modelled, the Highway Authority require further modelling of the Solent Road / Park Road South signalised junction. The Highway Authority have concerns as to whether the proposed site will cause this junction to be over capacity due to a predicted 46% of traffic using this junction on their commute to work. Furthermore, the Highway Authority require modelling up until 2026 at all previous junctions that have been modelled in addition to the Solent Road / Park Road South signalised junction. A detailed review of the junction modelling shall be provided once the modelling has been updated.

An approved model for the Solent Road/Park Road South junction is available to purchase from the Highway Authority at a cost to the applicant. Further discussions should be held with the Highway Authority to arrange for the modelling of the aforementioned junction.

Travel Plan

This Framework Travel Plan has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of Travel Plans – "A Guide to Development Related Travel Plans". Whilst the quality of this Travel Plan is generally good, it still requires some amendments before it can be approved.

Background:

The Travel Plan references the National Planning Policy Framework and the Planning Policy Practice Guidance 'Travel Plans, Transport Assessments and Statements (20140. However, there are a number of important policies and guidelines missing from this section. The following should be added in to the Travel Plan:

- CIHT's 'Guidelines for Providing Journeys on Foot' (2000)
- CIHT's 'Buses in Urban Developments' (2018)
- DfT's Manual for Streets (2007)
- Hampshire's Local Transport Plan 2011-2031 (2013)
- Hampshire County Council's 'A Guide to Development Related Travel Plans' (2009)
- Hampshire County Council's Parking Standards
- LPA Parking SPD (where applicable)
- LPA Clean Air Policy (where applicable)

- LPA Local Plan (where applicable)
- LPA Electric Vehicle SPD (where applicable)
- Neighbourhood Plans (where applicable)

Consultation and Partnerships:
The Travel Plan should contain evidence of preliminary liaisons with local cycle shops and public transport operators to scope the possibility of arranging for discounts on equipment and services respectively. These communications can then form the basis for further negotiations between these companies and the Travel Plan Coordinator (TPC).

Measures:
A number of additional measures should be considered for inclusion into the Travel Plan;

Walking:
- Showers, changing facilities and lockers for storing clothes

Cycling:
- Showers, changing facilities and lockers
- Formation of a bicycle users group (BUG)
- Provision of an interest free loan for a bike
- Pool bikes and mileage allowances for cycle use
- Bike Service Stations (staff and visitors)

Public Transport:
- Collaboration with local public transport providers to improve services, negotiate discounts and trial initiatives
- Works buses / shuttle buses
- Employers can consider provision of interest free loans to purchase season tickets (up to £5000 can be provided without tax implications)
- Guaranteed ride home for staff in emergency situations
- Introduce “collection from station” service for visitors

Marketing and promotion:
- Advertising TP to staff through recruitment – e.g. how to get there for interview and on the website

Action Plan:
An Action Plan is included within the Framework Travel Plan. Unfortunately, it is not detailed enough and should be revised to include details each measure to be conducted as part of the Travel Plan (including resources to be allocated to the TPC role). The action plan should be similar in layout to the example table below. A cost estimate for these items must be included which is used to approximate a Travel Plan Cash Deposit (see “Delivery and Enforcement).

Objective	Action	Start Date	Due Date	Responsibility	Mode affected	Cost Estimate

Table 2 - Example Action Plan

Roles and Responsibilities:
The Travel Plan states that a Travel Plan Coordinator (TPC) will be identified in the future. More detail should be provided in relation to the following matters;

- Number of hours to be spent on the Travel Plan per week
- Number of weeks per year to be worked on
- The cost per hour of the Travel Plan coordinator
- Total cost of the TPC

Monitoring:
A minimum 35% response rate must be attained in order for travel questionnaire surveys to be considered statistically significant. If this cannot be achieved, then discussions should be had with HCC regarding carrying out TRICS SAM or ATC surveys. There should also be a commitment to undertake Snapshot surveys in Years 2 and 4 to ensure that the Travel Plan is on track.

Delivery and Enforcement:
There should be a reference in the document to a means for enforcing the Travel Plan. Typically, this is accomplished through a Section 106 agreement. A commitment to pay HCC's monitoring and approval fees should be included in the Travel Plan. Sanctions should be in place in the event that the commitments stated in the Travel Plan are not met. This includes any remedial measures which could be implemented if the targets are not met, e.g., personalised transport planning.

Conclusion:
The Travel Plan will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site. If you have any questions, please do not hesitate to contact Debbi Smith by email on debbi.smith3@hants.gov.uk.

Recommendations

The Highway Authority require the following information before any formal recommendations can be made:
- Pedestrian and cycle audit of the wider pedestrian and cycle network which should be fully supported by a WCHAR assessment (HCC TG19);
- Analysis of the most recent 5-year PIA data using Hampshire Constabulary records;
- Visibility splays for the pedestrian crossing at the site access and outside of the PW offices;
- Amendments to the internal footway provision on the eastern side to accommodate the zebra crossing appropriately into the revised layout.
- Provision of an updated site access diagram with the inclusion of the highway boundary to understand whether trees that are proposed are located within the highway;
- Further clarification regarding the pedestrian movements inside the site;
- Explore the scope of moving the pedestrian crossing outside the PW offices further east if visibility splays are not adequate;
- An outline as to how the applicant will prevent PW employees from parking in the car park for the medical practice;
- Modelling of the Solent Road / Park Road South signalised junction;
- Modelling of all junctions mentioned in the TA and the Solent Road / Park Road South signalised junction up until 2026; and
- Amendments to the Travel Plan.

Landscape Team, HBC

Further Comments:

Uploaded 29.03.22

From a landscape perspective we have the following comments in relation to this application:

- There appears a missed opportunity to create a soft landscaping a focal point when viewing north up the access road. A UK native legacy tree such as Oak, Beech or Hornbeam could be strategically placed south of the office and within that access road sightline to soften the development and create a more visually interesting design.

Further Comments:

Uploaded 18.10.21

From a landscape perspective we have the following comments in relation to this application:
- Given the application site is located within both a flood zone 2 and 3 all proposed soft landscaping must be tolerant of wet conditions.
- The footway which runs to the along the east side of the main access road should align with the crossing on the western side and should also include tactile paving to assist pedestrians.

Original Comments

Uploaded 20.08.21

Comments

From a landscape perspective we have the following comments in relation to this application:

- Given the application site is located within both a flood zone 2 and 3 all proposed soft landscaping must be tolerant of wet conditions.
- The proposed disabled parking bays are not DDA compliant as the hatching should be present on the both sides as well as the rear of the bay. See BS 8300:2009 for correct layout.
- The footway which runs to the along the east side of the main access road should align with the crossing on the western side and should also include tactile paving to assist pedestrians.
- The proposed Symphoricarpos "Hancock" is extremely invasive and is not deemed an appropriate.

Local Lead Flood Authority HCC

Further Comments:

01.09.23

The drainage information should be updated as the developable area has been significantly reduced and discharge rates should be reduced accordingly. Please advise when the updated drainage information has been made available by the applicant, as the LLFA would need to review this again prior to confirming that we have no objection to the proposals.

Further Comments
We note that the Environment Agency (EA) raised objection to this planning application and the applicant has been in touch with the EA in order to overcome their objection. As our formal response stated: we request fully written agreement from the (EA) for the proposals including the hydraulic modelling and flood alleviation works.

Our formal response requested additional information which has not been included with this re-consultation:

- Detailed drainage layout drawings at an identified scale indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths, and gradients.
- Detailed network hydraulic calculations for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage features including the discharge location. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage features should have the same reference that the submitted drainage layout.
- Additionally, and since the proposed outfall will be within the fluvial flood extent, the hydraulic calculations should include a surcharged outfall equivalent to the predicted 1 in 100-year flood level showing how that event will be managed safety.
- Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
- Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.
-

Therefore, our formal response dated 05th August 2021 still stands.

Further Comments:

23.03.22

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

The County Council has reviewed the following documents relating to the above application:

• Consolidated Response to Environment Agency, Portsmouth Water and LLFA.
• Flood Risk Assessment; ref: 21-012_Land North of Solent Road, Havant; dated: 14.04.2021.

The additional information submitted by the applicant indicates that modelling files have been submitted to the Environment Agency (EA), which are in discussion with the applicant over the model submitted and working on agreeing the results.

Bearing in mind the level of risk here and the importance of these mitigations measures and considering that the Brockhampton Stream is a designated main river, we request fully written agreement from the (EA) for the proposals including the hydraulic modelling and flood alleviation works.

We can only comment on the surface water elements but given that the surface water will discharge into the fluvial risk areas, it is essential that this model is appropriately verified.

Following our formal response to this planning application dated 05th August 2021, we received additional information on the 11th March 2022 including the requested detailed drainage drawings and hydraulic calculations.

The additional information has addressed our concerns regarding surface water management. Therefore, and providing that the EA fully agrees to the proposals, the County Council as the Lead Local Flood Authority has **no objection** to the proposals subject to the following planning conditions:

1.The drainage system shall be constructed in accordance with the approved documentation. Any changes to the approved documentation must be submitted to and approved in writing by Local Planning Authority and Lead Local Flood Authority. Any revised details submitted for approval must include a technical summary highlighting any changes, updated detailed drainage drawings and detailed drainage calculations.

2.Details for the long-term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include;

a. Maintenance schedules for each drainage feature type and ownership.
b. Details of protection measures.

As a statutory consultee, the County Council has a duty to respond to consultations within 21 days. The 21 day period will not begin until we have received sufficient information to enable us to provide a meaningful response.

Please ensure all data is sent to us via the relevant Local Planning Authority. For guidance on providing the correct information, we recommend you use our Surface Water Management Pre-application service which provides clear guidance on what is required for us to recommend that planning permission is granted and consider the works as best practise. For full details, please visit:
https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/p lanning and click on pre-application advice request form.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Further Comments

28/09/21

We note that the Environment Agency (EA) raised objection to this planning application and the applicant has been in touch with the EA in order to overcome their objection. As our formal response stated: we request fully written agreement from the (EA) for the proposals including the hydraulic modelling and flood alleviation works.

Our formal response requested additional information which has not been included with this re-consultation:

- Detailed drainage layout drawings at an identified scale indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths, and gradients.

• Detailed network hydraulic calculations for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage features including the discharge location. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage features should have the same reference that the submitted drainage layout.
• Additionally, and since the proposed outfall will be within the fluvial flood extent, the hydraulic calculations should include a surcharged outfall equivalent to the predicted 1 in 100-year flood level showing how that event will be managed safety.
• Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
• Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

Therefore, our formal response dated 05th August 2021 still stands.

Original Comments

05/08/21

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

The County Council has reviewed the following documents relating to the above application:

• Flood Risk Assessment; ref: 21-012_Land North of Solent Road, Havant; dated: 14.04.2021.

The Brockhampton Stream is adjacent to the application site and as a consequence of the proximity, part of the site is within the extent of Flood Zones 2 and 3. It is a designated Main River, making the management of the flood risk associated with it the responsibility of the Environment Agency (EA) which should be consulted.

The information submitted indicates that: the applicant has submitted flood modelling and are undertaking flood alleviation works to the adjoining watercourse. This work is being undertaken under Environmental Permit licence number EPR/PB3294JJ.

Bearing in mind the level of risk here and the importance of these mitigations measures and considering that the Brockhampton Stream is a designated main river, we request fully written agreement from the (EA) for the proposals including the hydraulic modelling and flood alleviation works.

We can only comment on the surface water elements but given that the surface water will discharge into the fluvial risk areas, it is essential that this model is appropriately verified.

The information submitted by the applicant in support of this planning application indicates that surface water runoff from the application site will be managed through porous paving

and an attenuation tank. Additionally, surface water will be discharged into the Brockhampton Stream at a discharge rate of 5.3 l/s (QBAR). This is acceptable in principle considering that the underlying geology will make infiltration infeasible at the site.

However, the information submitted by the applicant is very high level considering that this is an application for full planning permission. Therefore, at this stage we request a detailed Drainage Strategy with the necessary information to cover each of the points on our surface water management checklist. The submitted information should include:

• Detailed drainage layout drawings at an identified scale indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths, and gradients.

• Detailed network hydraulic calculations for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage features including the discharge location. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage features should have the same reference that the submitted drainage layout.

• Additionally, and since the proposed outfall will be within the fluvial flood extent, the hydraulic calculations should include a surcharged outfall equivalent to the predicted 1 in 100-year flood level showing how that event will be managed safety.

• Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.

• Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

We note that surface water from the attenuation tank will be pumped into the Brockhampton Stream. Pumping surface water runoff should be the last resort for any development site in order to avoid the residual flood risk introduced in the event of pump failure. Therefore, the applicant should ensure that there is resilience within the pumped system such as having a second pump which will be on standby in the event of pump failure.

Bearing in mind that this is an application for full planning permission and the layout will be fixed, we request that the above issues are addressed at this stage and not through planning conditions. This is to demonstrate that the quantum of development is achievable, whilst ensuring that flood risk will not be increased on or off site.

We would also recommend that the applicant is directed to our website http://www3.hants.gov.uk/flooding/hampshireflooding/drainagesystems.htm for further information on recommended surface water drainage techniques.

Please note that Hampshire County Council as Lead Local Flood Authority will not comment on the fluvial systems as these are outside our remit.

As a statutory consultee, the County Council has a duty to respond to consultations within 21 days. The 21-day period will not begin until we have received sufficient information to enable us to provide a meaningful response.

Please ensure all data is sent to us via the relevant Local Planning Authority.
For guidance on providing the correct information, please review the checklist and

associated guidance document available on our website.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

National Highways

Further Comments

13/09/23
Thank you for your email dated 30th August 2023 re-consulting us on the above proposal, following the receipt of additional and revised information from the applicant.

National Highways was appointed by the Secretary of State for Transport as Strategic Highway Company under the provisions of the Infrastructure Act 2015 and is the Highway Authority, Traffic Authority and Street Authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this development proposal, our interests relate to the A27 and A3(M). We would be concerned if there were any potential safety or efficiency impacts to our network.

We were previously consulted on the proposal for the same planning app ref: APP/21/00601 and issued a 'no objection' recommendation on 19th October 2021. This consultation concerns revisions to the scheme as a result of the removal of the proposed industrial employment units. The application is now for the proposed Portsmouth Water offices only, which remains at the originally proposed size.

We have reviewed the revised information submitted, in particular the revised Transport Assessment (TA). This details that, as would be expected due to the changes in the scheme, there is a reduction in trip generation compared to the original TA which we had no objection to. It also shows a corresponding reduction in traffic impact at the A27/Harts Farm Way junction. The methodology of the TA has not changed, so we still consider the expected traffic impact accurate and acceptable.

Based on the above, we are satisfied that there is no significant impact to the safe and efficient operation of the SRN and our no objection recommendation dated 19th October 2021 stays the same. However, due to substantial changes to the proposal and passing of time, please find attached new formal NHPR attached.

Referring to the consultation on the planning application referenced above, in the vicinity of the A27 and A3(M) that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection;

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Further Comments:

19.10.21

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this development proposal, our interest is in the A27. We reviewed submitted information and recommend no objection to application APP/21/00601, see attached NHPR.

Referring to the consultation on the planning application dated 28th September 2021 referenced above, in the vicinity of the A27 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Natural England

Further Comments

14/08/24

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

DESIGNATED HABITATS SITES – NO OBJECTION SUBJECT TO SECURING APPROPRIATE MITIGATION

This advice should be taken as Natural England's formal representation on appropriate assessment given under regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 (as amended). You are entitled to have regard to this representation.

With regard to National Site Network sites, Natural England does not object to the granting of this permission subject to the advice given below.

Your appropriate assessment dated 08 July 2024, concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions.

Your authority has measures in place to manage potential impacts through contributions to an agreed strategic solution which we consider to be ecologically sound. Natural England is of the view that if these measures, including contributions to them, are implemented, they will be effective and reliable in preventing harmful effects on the Habitats Site(s) for the duration of the proposed development. Mitigation measure(s) to offset any positive nutrient budget should be provided within the relevant catchment area(s).

This advice is provided on the basis that all mitigation measures will be secured as planning conditions or obligations by your authority to ensure their strict and timely implementation for the full duration of the development. Your authority should be assured that proposed financial contribution rates are proportionate to the identified effects of the proposed development, suitably precautionary, and in line with the Retail Price Index, where relevant.

SPA Functionally linked land

The site is identified in the updated Solent Waders and Brent Goose Strategy as a Low Use site. The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

The appropriate assessment sets out that a financial contribution will be secured, the contribution will be used at Warblington Farm to fund habitat enhancements. Natural England recommends that the intended habitat enhancements should be set out in the appropriate assessment. The site has already been managed as permanent grassland sown

with a clover rich permanent grass mix for several years as secured by the Warblington Farm Position Statement and Mitigation Plan for Nutrient Neutral Development (Havant Borough Council August 2020) in order to generate nutrient credits. There is a question of whether this management now represents the ecological baseline at this site. In order to meet the requirements of the Habitats Regulations, the Council as competent authority should be satisfied that any financial contributions are used for additional habitat enhancements rather than continued baseline management. Provided this is the case then Natural England has no further comments on this aspect. Further advice on combining environmental payments can here Combining environmental payments: biodiversity net gain (BNG) and nutrient mitigation - GOV.UK (www.gov.uk).

Deterioration of the water environment

As Competent Authority it is your responsibility to ensure that you are confident that there is sufficient information to support the values used in any nutrient budget calculation that supports this application, and that any nutrient budget calculation(s) are correct.

Where calculations include removal of nutrients through on-site Sustainable Urban Drainage Systems (SuDs) it is essential for your authority to verify that the necessary supporting evidence has been submitted, as that forms the basis for the SuDS calculations. As highlighted in the guidance that accompanies the calculators on Gov.uk, Natural England advises that SuDS calculations should be undertaken in accordance with CIRIA guidance (C808 – Using SuDS to reduce phosphorus in surface water runoff (2022) and/or C815 – Using SuDS to reduce nitrogen in surface water runoff (2023)).

In addition, the SuDS features require management in perpetuity. Your authority must ensure that a robust ongoing management plan is appropriately secured and is enforceable in any planning permission given.

Further Comments
Uploaded 27.11.23

Natural England has previously commented on this proposal and made comments to the authority in our response dated 3 October 2023, reference number 448555.

The advice provided in our previous response applies equally to this Amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

03.10.23

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Chichester &

Langstone Harbours Special Protection. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.
The following information is required:

• An Appropriate Assessment
• Details of the mitigation for the partial loss of the Low Use Solent Wader & Brent Goose Site H11. Such as a management/monitoring plan for potential onsite mitigation or details of the project to which the proposed financial contribution will be spent.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

Habitat Regulations Assessment/Appropriate Assessment

The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 63 and 64 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

In advising your authority on the requirements relating to Habitats Regulations Assessment, it is Natural England's advice that the proposal is not necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out.

Please note that, recent case law ('Sweetman II') outlines that mitigation measures should not be assessed through a Habitats Regulations Assessment (HRA) to 'screen out' impacts at the stage of considering Likely Significant Effects (LSE), rather avoidance / mitigation measures should be considered through an Appropriate Assessment. Therefore in this case, as mitigation measures are proposed to avoid a likely significant effect your authority's HRA will need to include an Appropriate Assessment under Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended).

Please note Natural England are a statutory consultee for Appropriate Assessments and should be re-consulted once your authority has completed its HRA.

Solent SPA Functionally Linked Land
The site is identified in the Solent Waders and Brent Goose Strategy as a Low Use site (H11). The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the existing network and provide alternative options and resilience for the future network. The incombination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

We note that the layout for the application has materially changed to with the western area of grassland to be retained and new structures and hardstanding limited to the north end of the

site. This allows potential for onsite mitigation through management and enhancement of the retained grassland. We recommend that further details of the mitigation package are provided, including a fully costed management and monitoring plan for any onsite mitigation.

An agreed and deliverable mitigation strategy could address the potential for significant effects arising from the development on the qualifying features of the Solent and Southampton Water SPA. Guidance on the off-setting and mitigation requirements can be found here, this sets out the necessary measures to avoid impacts.

Please note, where financial contributions are proposed, it is advised that a sufficient level detail of the measures to which they will be directed is provided to inform your authority's appropriate assessment, in order to provide the necessary confidence and certainty that such mitigation will be effective and deliverable in perpetuity.

Natural England will be happy to advise further on this aspect via our Discretionary Advice Service (DAS).

Sites of Special Scientific Interest
Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Please consult us again once the information requested above, has been provided.

Further Comments:

03/10/23

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Chichester & Langstone Harbours Special Protection. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.
The following information is required:
• An Appropriate Assessment
• Details of the mitigation for the partial loss of the Low Use Solent Wader & Brent Goose Site H11. Such as a management/monitoring plan for potential onsite mitigation or details of the project to which the proposed financial contribution will be spent.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

Habitat Regulations Assessment/Appropriate Assessment
The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 63 and 64 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

In advising your authority on the requirements relating to Habitats Regulations Assessment, it is Natural England's advice that the proposal is not necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out.

Please note that, recent case law ('Sweetman II') outlines that mitigation measures should not be assessed through a Habitats Regulations Assessment (HRA) to 'screen out' impacts at the stage of considering Likely Significant Effects (LSE), rather avoidance / mitigation measures should be considered through an Appropriate Assessment. Therefore in this case, as mitigation measures are proposed to avoid a likely significant effect your authority's HRA will need to include an Appropriate Assessment under Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended).

Please note Natural England are a statutory consultee for Appropriate Assessments and should be re-consulted once your authority has completed its HRA.

Solent SPA Functionally Linked Land
The site is identified in the Solent Waders and Brent Goose Strategy as a Low Use site (H11). The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

We note that the layout for the application has materially changed to with the western area of grassland to be retained and new structures and hardstanding limited to the north end of the site. This allows potential for onsite mitigation through management and enhancement of the retained grassland. We recommend that further details of the mitigation package are provided, including a fully costed management and monitoring plan for any onsite mitigation.

An agreed and deliverable mitigation strategy could address the potential for significant effects arising from the development on the qualifying features of the Solent and Southampton Water SPA. Guidance on the off-setting and mitigation requirements can be found here, this sets out the necessary measures to avoid impacts.

Please note, where financial contributions are proposed, it is advised that a sufficient level detail of the measures to which they will be directed is provided to inform your authority's appropriate assessment, in order to provide the necessary confidence and certainty that such mitigation will be effective and deliverable in perpetuity.

Natural England will be happy to advise further on this aspect via our Discretionary Advice Service (DAS).

Sites of Special Scientific Interest
Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Please consult us again once the information requested above, has been provided.

Further Comments:

20/09/23

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Chichester & Langstone Harbours Special Protection. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.
The following information is required:

• An Appropriate Assessment
• Details of the mitigation for the partial loss of the Low Use Solent Wader & Brent Goose Site H11. Such as a management/monitoring plan for potential onsite mitigation or details of the project to which the proposed financial contribution will be spent.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

Habitat Regulations Assessment/Appropriate Assessment

The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 63 and 64 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

In advising your authority on the requirements relating to Habitats Regulations Assessment, it is Natural England's advice that the proposal is not necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out.

Please note that, recent case law ('Sweetman II') outlines that mitigation measures should not be assessed through a Habitats Regulations Assessment (HRA) to 'screen out' impacts at the stage of considering Likely Significant Effects (LSE), rather avoidance / mitigation measures should be considered through an Appropriate Assessment. Therefore in this case, as mitigation measures are proposed to avoid a likely significant effect your authority's HRA will need to include an Appropriate Assessment under Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended).

Please note Natural England are a statutory consultee for Appropriate Assessments and should be re-consulted once your authority has completed its HRA.

Solent SPA Functionally Linked Land

The site is identified in the Solent Waders and Brent Goose Strategy as a Low Use site (H11). The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the existing network and provide alternative options and resilience for the future network. The incombination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

We note that the layout for the application has materially changed to with the western area of grassland to be retained and new structures and hardstanding limited to the north end of the site. This allows potential for onsite mitigation through management and enhancement of the retained grassland. We recommend that a costed management and monitoring plan is submitted to and agreed by the Council's ecologist, and secured by appropriate planning condition.

The supporting shadow Habitat Regulations Assessment sets out that in line with the Solent Wader and Brent Goose Strategy mitigation guidance a financial contribution of £48,073.50 to wider offsite mitigation will be provided. Natural England advises that the Habitats Regulations Assessment and Appropriate Assessment for any development proposal will need to include details of the project that any offsetting funding will contribute to.

Sites of Special Scientific Interest

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service. Please consult us again once the information requested above, has been provided.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Solent Maritime Special Area of Conservation, Chichester and Langstone Harbours Special Protection Area and Ramsar. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.
The following information is required:

- *A Habitat Regulations Assessment*
- *A drainage assessment of impacts from surface water runoff*
- *Details of mitigation for loss of Solent Wader and Brent Goose Strategy Low Use site*

Without this information, Natural England may need to object to the proposal.
Please re-consult Natural England once this information has been obtained.
Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

SPA functional land
The site is identified in the Solent Waders and Brent Goose Strategy as a Low Use site. The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the
existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

Natural England is concerned that, without appropriate mitigation, the proposed development could have significant direct impacts upon the qualifying features of the aforementioned designated site due to impacts on the Solent Waders and Brent Goose ecological network. Where impacts cannot be avoided or adequately mitigated on-site, proportionate mitigation would comprise off-setting or enhancement measures via payment towards the management and enhancement of the wider waders and brent geese ecological network.

An agreed and deliverable mitigation strategy could address the potential for significant

effects arising from the development on the qualifying features of the Solent and Southampton Water SPA. Guidance on the off-setting and mitigation requirements can be found here, this sets out the necessary measures to avoid impacts. Securing early commitment to this mitigation will ensure the potential significant effects have been addressed.

Our advice is that this needs to be confirmed by the Council, as the competent authority, via an appropriate assessment to ensure there is no adverse effect on the integrity of the site(s) in accordance with the Conservation of Habitats and Species 2017 (as amended).

Appropriate assessments cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned. Complete information is required to ensure that the proposal will not affect the integrity of the international sites. We therefore advise the AA includes details of the project that any offsetting funding will contribute to. In the first instance, the local planning authority should be contacted to see if there is an appropriate strategic scheme in place. Alternatively, the applicant will need to identify a bespoke mitigation scheme that the offsetting funding can contribute to.

Natural England would be happy to advise on the level of mitigation required under our Discretionary Advice Service.

Impacts on the water environment
The application site is bordered by the Brockhampton Stream, which drains into the Solent Maritime SAC, Chichester and Langstone Harbours SPA and Ramsar. The proposals have the potential to negatively impact the water environment during the construction and operational phases.

Construction impacts
The application is supported by a Construction Environmental Management Plan (CEMP) (Chancerygate March 21) which sets out the steps and procedures that will be implemented to avoid or mitigate constructional impacts on species and habitats including dust suppression and control of surface water runoff.

We advise the CEMP should be submitted to and approved by your retained ecologist. The approved CEMP should be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.
This detail should be included in the Appropriate Assessment to ensure there is no adverse impact from the construction work on the adjacent designated sites

Operational impacts
Natural England advises that the application should be supported by a drainage assessment/strategy which should consider the current condition of the site and nearby watercourses, assess the potential impacts upon the protected sites from water pollution and nutrient enrichment, and suggest mitigation measures where impacts are identified. Consideration should be given to the various pollutants that may be present in surface water arising from traffic use of the site (e.g. chemicals, oils, hydrocarbons etc.).

Consideration should be given to the incorporation of 'naturalised' sustainable urban drainage systems (SuDS) into the scheme design that aims to reduce the volume of run-off from the development site, slow the flow of run-off to greenfield rates, and include pollutant controls, prior to discharge into any watercourse. SuDS should be designed and installed in accordance with latest best practice guidance in the CIRIA SuDS Manual (C753).

Our advice is that these impacts should be addressed by the Council, as the competent authority, via an appropriate assessment to ensure there is no adverse effect on the integrity of the site in accordance with the Habitats Regulations.

In addition, Natural England would advise on the following issues.

Protected species and Biodiversity Enhancement

In order for your authority to be assured that the proposal meets the requirements of Natural England's standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 7, 8, 131, 174, 175 180, Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist.

The submission of an HCC approved BMEP will help ensure your authority meets the requirements of Section 40 of the Natural Environment and Rural Communities Act (2006), which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Provided an HCC approved BMEP, or equivalent, is received and secured by any permission then your authority may be satisfied that it will have met its duties under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity', and in relation to European Protected Species Regulation 9(3) of The Conservation of Habitats & Species Regulations 2017 (as amended)

Please note that provided the HCC Ecologists are satisfied with the submitted BMEP and the full implementation of the plan is secured by any permission then no further consultation with Natural England on this aspect of the proposal is required. In the event that a BMEP cannot be agreed with the applicant then Natural England should be re-consulted on the proposals so that we can reconsider our advice.

If you have any queries relating to the advice in this letter please contact me on 07500 954264.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Please consult us again once the information requested above, has been provided.

Further Comments:

31/08/23

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

European sites
Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest
Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Sites of Special Scientific Interest
Impact Risk Zones The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The
dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Further Comments:

Uploaded 26.11.21

Thank you for consulting us on the above application. We previously responded to this application on 26th August and the advice in this response still applies.

The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 63 and 64 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.

In advising your authority on the requirements relating to Habitats Regulations Assessment, it is Natural England's advice that the proposal is not necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out.

Please note that, recent case law ('Sweetman II') outlines that mitigation measures should not be assessed through a Habitats Regulations Assessment (HRA) to 'screen out' impacts at the stage of considering Likely Significant Effects (LSE), rather avoidance / mitigation

measures should be considered through an Appropriate Assessment. Therefore in this case, as mitigation measures are proposed to avoid a likely significant effect your authority's HRA will need to include an Appropriate Assessment under Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (as amended) . Please note Natural England are a statutory consultee for Appropriate Assessments and should be re-consulted once your authority has completed its HRA.

Original Comments:
26.08.21

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Solent Maritime Special Area of Conservation, Chichester and Langstone Harbours Special Protection Area and Ramsar. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. The following information is required:
• A Habitat Regulations Assessment
• A drainage assessment of impacts from surface water runoff
• Details of mitigation for loss of Solent Wader and Brent Goose Strategy Low Use site

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

SPA functional land

The site is identified in the Solent Waders and Brent Goose Strategy as a Low Use site. The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and recreational pressure associated with new development. All Low Use sites have the potential to be used by waders or brent geese and these sites have the potential to support the
existing network and provide alternative options and resilience for the future network. The in-combination loss of these sites would impact on the continued ecological function of the wader and brent goose network and proportionate mitigation, off-setting and/or enhancement measures will be required.

Natural England is concerned that, without appropriate mitigation, the proposed development could have significant direct impacts upon the qualifying features of the aforementioned designated site due to impacts on the Solent Waders and Brent Goose ecological network. Where impacts cannot be avoided or adequately mitigated on-site, proportionate mitigation would comprise off-setting or enhancement measures via payment towards the management and enhancement of the wider waders and brent geese ecological network.

An agreed and deliverable mitigation strategy could address the potential for significant

effects arising from the development on the qualifying features of the Solent and Southampton Water SPA. Guidance on the off-setting and mitigation requirements can be found here, this sets out the necessary measures to avoid impacts. Securing early commitment to this mitigation will ensure the potential significant effects have been addressed.

Our advice is that this needs to be confirmed by the Council, as the competent authority, via an appropriate assessment to ensure there is no adverse effect on the integrity of the site(s) in accordance with the Conservation of Habitats and Species 2017 (as amended).

Appropriate assessments cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned. Complete information is required to ensure that the proposal will not affect the integrity of the international sites. We therefore advise the AA includes details of the project that any offsetting funding will contribute to. In the first instance, the local planning authority should be contacted to see if there is an appropriate strategic scheme in place. Alternatively, the applicant will need to identify a bespoke mitigation scheme that the offsetting funding can contribute to.

Natural England would be happy to advise on the level of mitigation required under our Discretionary Advice Service.

Impacts on the water environment
The application site is bordered by the Brockhampton Stream, which drains into the Solent Maritime SAC, Chichester and Langstone Harbours SPA and Ramsar. The proposals have the potential to negatively impact the water environment during the construction and operational phases.

Construction impacts
The application is supported by a Construction Environmental Management Plan (CEMP) (Chancerygate March 21) which sets out the steps and procedures that will be implemented to avoid or mitigate constructional impacts on species and habitats including dust suppression and control of surface water runoff.

We advise the CEMP should be submitted to and approved by your retained ecologist. The approved CEMP should be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

This detail should be included in the Appropriate Assessment to ensure there is no adverse impact from the construction work on the adjacent designated sites

Operational impacts
Natural England advises that the application should be supported by a drainage assessment/strategy which should consider the current condition of the site and nearby watercourses, assess the potential impacts upon the protected sites from water pollution and nutrient enrichment, and suggest mitigation measures where impacts are identified. Consideration should be given to the various pollutants that may be present in surface water arising from traffic use of the site (e.g. chemicals, oils, hydrocarbons etc.).

Consideration should be given to the incorporation of 'naturalised' sustainable urban drainage systems (SuDS) into the scheme design that aims to reduce the volume of run-off from the development site, slow the flow of run-off to greenfield rates, and include pollutant controls, prior to discharge into any watercourse. SuDS should be designed and installed in accordance with latest best practice guidance in the CIRIA SuDS Manual (C753).

Our advice is that these impacts should be addressed by the Council, as the competent authority, via an appropriate assessment to ensure there is no adverse effect on the integrity of the site in accordance with the Habitats Regulations.
In addition, Natural England would advise on the following issues.

Protected species and Biodiversity Enhancement

In order for your authority to be assured that the proposal meets the requirements of Natural England's standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 7, 8, 131, 174, 175 180, Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist.

The submission of an HCC approved BMEP will help ensure your authority meets the requirements of Section 40 of the Natural Environment and Rural Communities Act (2006), which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Provided an HCC approved BMEP, or equivalent, is received and secured by any permission then your authority may be satisfied that it will have met its duties under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity', and in relation to European Protected Species Regulation 9(3) of The Conservation of Habitats & Species Regulations 2017 (as amended)

Please note that provided the HCC Ecologists are satisfied with the submitted BMEP and the full implementation of the plan is secured by any permission then no further consultation with Natural England on this aspect of the proposal is required. In the event that a BMEP cannot be agreed with the applicant then Natural England should be re-consulted on the proposals so that we can reconsider our advice.

If you have any queries relating to the advice in this letter please contact me on 07500 954264.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Planning Policy

Further Comments:

08.11.23

No need to update my comments.

I can see that an EA table commenting on the modelling has been submitted, but as far as I can tell that relates only to the suitability of the modelling, and does not confirm that the EA are happy with the conclusions in the FRA RE the safety of the development, so my comments remain the same. In particular, I think they need to confirm that they agree with the conclusion at para 7.10 of the FRA that the site will remain [fluvial] flood free during the 1 in 100 year plus climate change scenario.

I understand that you've reconsulted the EA. If they confirm they are happy with the modelling, and more importantly, the conclusions of the FRA, I'm happy.

Further Comments

11.09.23

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 and 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

	Compensation Costs per hectare
Secondary Support Area	£85,464
Low Use site	£35,610

Table 1 – Summary of Indicative Compensation Costs for Creating and Managing Replacement Habitat (per hectare) – Based on Countryside Stewardship Grants 2017[10]. (Future changes to these costs will be revised in line with any changes to Countryside Stewardship Payments or equivalent, and subject to review)

Original Comments:

05.08.21

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. The emerging Havant Brough Local Plan is currently subject to examination and carries limited weight.

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).

This allocation is not proposed to be taken forward into the emerging local plan (see discussion under flood risk below). The land would become 'white land' but remain within the defined settlement boundary under emerging policy E3. While the direction of travel therefore is that the specific support of an employment development allocation would fall away upon adoption of the emerging local plan, the in principle support for development within the defined settlement boundary would remain.

Overall, the policy position therefore favours development on this site in principle. Material considerations in the determination of any application would therefore relate to the details of the proposal. Key matters of policy are discussed below.

Employment floorspace:

The allocation envisages 6,600sqm of employment floorspace. The proposal is for significantly less at just over 4,000sqm. 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. Overall, the amount of floorspace proposed is considered acceptable in policy terms.

Flood Risk:

The vast majority of the site lies in Flood Zone 2 and 3, both in the present day and with climate change. The access is also in Flood Zone 3. Based on current EA mapping flood risk cannot be avoided in developing the site.

It is noted that the applicant has undertaken hydraulic modelling to assess the extent of the flood risk area more accurately and has consulted with the EA in undertaking this modelling. A permit has been granted by the EA for a scheme to remove a culvert from the adjoining watercourse. The applicant indicates that these works are underway and when completed, the site will remain flood free during the 1 in 100 year plus climate change scenario and will be therefore located in Flood Zone 1. The FRA accompanying the license applications for these works concludes that they would not increase flood risk elsewhere.

The planning application is also accompanied by a Flood Risk Assessment. It is noted that in terms of fluvial flooding it relies on the flood alleviation works mentioned above. The EA should be consulted on this assessment and its conclusions with regard to flood risk on site and in the surrounding area, which had previously been highlighted as a particular concern. If the EA confirm they are satisfied, this would address the policy concern on this matter.

It is also noted that the application includes SuDS proposals, which is welcomed.

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. The applicant has undertaken detailed modelling and flood alleviated works are underway.

Consultation with the EA should establish whether 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

It is noted that the applicant has addressed these points in detail in their submission.

Comments on Solent Wader and Brent Goose Strategy Mitigation

The indicative compensation costs for creating and replacement habitat (per hectare) can be found within the Solent Wader and Brent Goose Strategy Mitigation Guidance. Extract of the table below.

	Compensation Costs per hectare
Secondary Support Area	£85,464
Low Use site	£35,610

Table 1 – Summary of Indicative Compensation Costs for Creating and Managing Replacement Habitat (per hectare) – Based on Countryside Stewardship Grants 2017[10]. (Future changes to these costs will be revised in line with any changes to Countryside Stewardship Payments or equivalent, and subject to review)

Portsmouth Water

Uploaded 29/11/23 (incorrectly dated 25/01/24)

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Our Position

Ecology and Landscape

We recommend the following condition to be included on any panning permission granted for the above development:

Condition

A fully detailed Landscape and Ecology Plan (LEMP) will be submitted to and approved by the local Planning Authority. The approved plan shall be implemented in accordance with the approved details.

Reason:
For habitat creation and management in order to provide ecological enhancement and strengthen the green infrastructure within the local area as well as to provide landscape and visual mitigation.

Supporting information

Portsmouth Water previously submitted information to support the above planning application but recognise that some of the details, in discussion with Havant Borough Council Ecologist and their own internal Catchment & Environment Management Team require amendments and assurances on landscape, future management and habitat creation. Amended habitat and planting plans and a Detailed Management Plan including ongoing maintenance will be submitted. We also propose to submit details within the LEMP that include the following changes and recommendations:

- Trees to be removed from between the river and the back of the building as they too close to the building and also within the root protection zone of the existing trees and scrub.

- Shrubs will be wildlife friendly and if not native, drought resilient and non-invasive as we manage the site for nature conservation and the planting needs to reflect this.

- We are in agreement with the county ecologist on the need for more detail on how the enhancements will be achieved and managed in order to hit the BNG submitted, this has to be manageable for PW. We will therefore submit a detailed Management Plan for the site to be in included in the LEMP

- On drawing 892.10.02 it states that under protection of existing trees that the heras fencing will be secured by ramming in 2.4m long scaffolding tubes. These will not be in the root protection zones or near any of our underground asset.

- The development is adjacent to the existing Portsmouth Water Head Offices conservation area managed for biodiversity by the company and is

surrounded by multiple Tree Preservation Orders as well as areas of international and national statutory designations. Therefore, all measures to protect biodiversity, by avoiding excavations within Root Protection Zones (RPZs), and meeting the Biodiversity Net Gain (BNG) requirements during and post construction are expected.

- At present no proposed bird or bat boxes or bricks are included in the proposed new Portsmouth Water Head Offices. The layout plan will be reviewed and address whether the inclusion of Bee bricks and Bat Bricks can be included and will be detailed in the LEMP.

- Under the Foul Water drainage strategy, the sewer main is to be relocated in the south-west of the site. This relocation and associated easement will encroach within the TPO group areas G2, G1 and G5 and the protected trees associated RPZs. This proximity risks causing damaged to the trees (TPO's). We will review this and provide alternative or mitigations measures and details these within the LEMP.

Catchment & Environment Team

21/11/23

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Biodiversity
We previously sent detailed information regarding biodiversity and landscape design for the proposed development. We have discussed our comments and recommendations with Portsmouth Water's architects and await changes to the overall landscape and planting details. For example, we noted that there were a number of trees that were proposed within the floodplain area to the north of the proposed office that are within the tree root zone of existing trees. We recommend that these should be removed from the design as they are inappropriate. Once the overall amendments have been made, these will be submitted for re-consultation.

Surface Water Drainage

Portsmouth Water are satisfied in principle with the surface water drainage strategy set out within the flood risk assessment and approve to the inclusion of pollution control measures (Class 1 petrol interceptor and filter chambers) within the implementation of appropriate Registered Office: Portsmouth Water Ltd PO Box 8 Havant Hampshire PO9 1LG Tel: 023 9249 9888 Fax: 023 9245 3632 Web: www.portsmouthwater.co.uk Sustainable Drainage. The Catchment and Environment Team agree drainage by infiltration including soakaways would be inappropriate for this site and support that no soakaways are to be used.

Given the proposed SUDs scheme discharges within SPZ1 of the groundwater catchment into Brockhampton Stream, and this flows into Langstone Harbour (which is designated RAMSAR, Special Protection Area, Special area of Conservation, a Site of Special Scientific Interest, and includes Priority Habitats) it's of high importance we ascertain the SUDs scheme - notably the pollution control mechanisms - shall be designed, maintained and managed appropriately after completion. We are satisfied with the proposed timelines within which SuDS features shall be inspected and maintained set out in Table 6-7: 'Management and Maintenance Strategy' of the updated Flood Risk Assessment.

The Flood Risk Assessment and & Drainage Strategy: 191925-R01 October 2023 has not been updated to reflect the amendment to the outline planning application proposal; removal of the Industrial Park and associated Industrial Units. For example, section 6.31 of the Flood Risk Assessment states 'The Industrial unit's commercial yard and delivery areas are to be protected by Class 1 bypass petrol interceptor. We know that these have been removed from the development so this Strategy should be updated to remove this information.

As mentioned within our previous response dated 31st March 2022*, 'we note that the two parking areas for the new Portsmouth Water Head Offices' drainage to the attenuation tank will bypass the petrol interceptor in the Drainage layout. The latest Strategy doesn't include a layout. Nonetheless, We expect the drainage design to be revised such that all cark park drainage flows through a petrol interceptor.'*

Subsequently it is Portsmouth Waters position that a condition is required for surface water drainage, and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 1: Surface Water Drainage

No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.
Reason - To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.

Condition 2: Foul Water Drainage

No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme. The scheme shall also include: • details of how the scheme shall be maintained and managed after completion. • details of the sewage pipe work layout and specifications. Reason: This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Condition 3: Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences. Reason - To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at

the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition 4: Piling and Foundations

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.
Reason-To ensure that any proposed Piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework, and position statement N8 Physical disturbance of an aquifer in a SPZ1 of the 'The Environment Agency's approach to groundwater protection'.

Condition 5: Construction and Environmental Management Plan (CEMP).
No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.
Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs

Supplementary Information

Solution features

We support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Land contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. Elevated concentrations of copper and Nickel have been identified in the groundwater samples, however there is no plausible on site source of Copper and Nickel on the site and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds would be required to ensure these are structurally sound and provide appropriate mitigation.

Further Guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below:
https://developers.portsmouthwater.co.uk/groundwater-protection/ Catchment Management Team

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Our Position

The development lies in a very sensitive groundwater location due to underlying principal aquifer. The site is located within the Source Protection Zone One (SPZ1) for an essential Public Water Supply Source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

We do not object in principle to the proposed development, however due to the sensitivity of the groundwater environment we wish to be consulted on the final design and plans for the site. Our concerns regarding groundwater quality protection can be addressed through the addition of appropriate planning conditions to reduce the potential risks posed to groundwater.

Below are the 5 planning conditions we would wish to be implied should permission be granted:

Condition 1 – Surface Water Drainage

No development shall take place until a surface water drainage scheme, based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied. Details of how the scheme shall be maintained and managed after completion shall also be included.
Reason - To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.

Condition 2- Foul Water Drainage

No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme. The scheme shall also include:

- *details of how the scheme shall be maintained and managed after completion.*
- *details of the sewage pipe work layout and specifications.*

Reason - This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Condition 3- Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition 4- Piling & Foundations

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

Reason-To ensure that any proposed Piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework, and position statement N8 Physical disturbance of an aquifer in a SPZ1 of the 'The Environment Agency's approach to groundwater protection'.

Condition 5- Construction Environmental Management Plan (CEMP)

No development shall commence until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs

Supplementary information
Drainage

The Flood Risk Assessment outlines the proposed surface water drainage strategy. The proposed surface water drainage strategy is the use of SuDS features with a controlled final discharge to an existing watercourse. The proposed SW drainage system is designed in accordance with CIRIA C753 and appropriate treatment is proposed. This is acceptable in relation to groundwater protection. We would wish to be consulted on the final surface water drainage design details and plans.

The proposed foul water drainage strategy is the connection to an existing main sewer, this is acceptable in relation to groundwater protection. We would wish to be consulted on the final sewer design details and connections.

Construction Environmental Management Plan (CEMP)

We have reviewed the Construction Environmental Management Plan (CEMP), we support the appropriate management of overland runoff in accordance with the Environment Agency's pollution prevention guidelines. Conversely, limited information has been provided on how the wheel washing drainage will be managed this needs to be detailed in this plan to ensure appropriate management of this drainage. Furthermore, details of hazardous material storage is required we note that this will in accordance with the Environment Agency pollution prevention guidelines, however details of storage on the site is required.

Piling & Foundations

The proposed site is situated in a sensitive groundwater catchment and there are potential significant risks associated with groundworks in this area. There would be a presumption against piling at this location. If the piling was the proposed foundation solution, no piling shall take place until a piling method statement and risk assessment (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, vibration and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water's Catchment and Environment Team.

Any piling, if proposed, must be undertaken in accordance with the terms of the approved piling method statement.

Solution features

We support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Land contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. Elevated concentrations of copper and Nickel have been identified in the groundwater samples, however there is no plausible on site source of Copper and Nickel on the site and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds would be required to ensure these are structurally sound and provide appropriate mitigation.

Further guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below:

https://www.portsmouthwater.co.uk/developers/groundwater-protection/

Further Comments:

31.03.22
Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective, Biodiversity Net Gain requirements, proximity to designated habitats of national and international importance, and proximity to adjacent company owned land managed for Biodiversity. We have the subsequent comments to make.

Groundwater Protection

The development lies in a highly sensitive groundwater location due to underlying principal chalk aquifer. The site is located within the Source Protection Zone One (SPZ1) for an essential Public Water Supply Source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

We do not object in principle to the proposed development, however due to the sensitivity of

the groundwater environment we wish to be consulted on further amendments to the final design and plans for the site and provide the following comments regarding the imposition of conditions.

1. Surface Water Drainage

Portsmouth Water are satisfied in principle with the surface water drainage strategy set out within the flood risk assessment and approve to the inclusion of pollution control measures (Class 1 petrol interceptor and filter chambers) within the implementation of appropriate Sustainable Drainage. The Catchment and Environment Team agree drainage by infiltration including soakaways would be inappropriate for this site and support that no soakaways are to be used.

Given the proposed SUDs scheme discharges within SPZ1 of the groundwater catchment into Brockhampton Stream, and this flows into Langstone Harbour (which is designated RAMSAR, Special Protection Area, Special area of Conservation, a Site of Special Scientific Interest, and includes Priority Habitats) it's of high importance we ascertain the SUDs scheme - notably the pollution control mechanisms - shall be designed, maintained and managed appropriately after completion. Whilst we are satisfied with the proposed timelines within which SUDs features shall be inspected and maintained set out within Table 7: 'Management and Maintenance Strategy' of the Flood Risk Assessment, the Catchment and Environment team require more information in regard to whom is responsible to maintain the SUDs after construction in the form of a detailed Management Plan. This is because of concern as per 5.3.1 of the Drainage Strategy the new Portsmouth Water Head Office and the Industrial Units shall have separate entities managing and maintaining the drainage despite integrated SUDs infrastructure. Whereby shared pollution mitigation features, attenuation tank and discharge point are all within the Industrial Units area becoming the responsibility of an undesignated third party. We are further concerned there are areas of the scheme, such as under the shared access road, for which it is unclear which of the two management entities are required to maintain the drainage.

Additionally, we note the two car parking areas for the new Portsmouth Water Head Offices' drainage to the attenuation tank will bypass the petrol interceptor in the Drainage layout. This is unacceptable to the Catchment and Environment Team due to the risk posed by hydrocarbons to our potable water abstraction and designated habitat sites. We therefore expect the drainage design to be revised such that all cark park drainage flows through a petrol interceptor.

Subsequently it is Portsmouth Waters position that a condition is required for surface water drainage and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 1:
No development shall take place until a surface water drainage scheme, based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. Details of how and by whom the scheme shall be maintained and managed by after completion shall be set out in writing within a detailed Management Plan. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.
***Reason** - To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.*

2. Foul Water Drainage

The proposed foul water drainage strategy is the connection to an existing main sewer, this is acceptable in principle in relation to groundwater protection. However we request to see the specification on the foul drainage pipe in order to ascertain it is sufficiently durable to mitigate the potential risk posed by leaks in SPZ1 of the groundwater catchment before we consent to the discharge of the relevant condition. We would expect all foul sewers to be constructed with a secondary Cured in Place Plastic (CIPP) liner or equivalent lining technology.

However we note proposals for the sewer main in the south-west of the site to be relocated along with the Easement to encroach within the Root Protection Zones (RPZs) of the trees covered by Tree Preservation Order areas G2, G1 and G5. This risks causing damaged to the protected trees, undermining the Biodiversity Net Gain requirements, potentially violating the TPO orders and generates a potential groundwater quality risk in very close proximity to potable supply abstractions as root ingress from large established trees may damage the sewer main. Thus we recommend the proposed relocated position of the sewer is reviewed such that it does not sit within RPZs.

We therefore request a condition is required, and request that this condition is not discharged until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 2:
No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme. The scheme shall also include:
• details of how the scheme shall be maintained and managed after completion.
• details of the sewage pipe work layout and specifications.

3. Unidentified Contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. We support the proposal for a watching brief and discovery strategy during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence and unidentified contamination.

The elevated concentrations of copper and Nickel identified in the groundwater samples have no plausible on-site source and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds are still required to ensure these are structurally sound and provide appropriate mitigation.

We therefore recommend a condition is required and request that this condition is not discharged until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 3:
If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development

(unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences. ***Reason*** *- To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.*

4. Piling & Foundations

We have reviewed the piling foundation method statement and find the content satisfactory. The employment of a Controlled Modulus Columns (CMC) system appears to present a low risk of contamination to water quality and therefore in principle it's use is acceptable. However there are 2 areas that we require further information:
1. Final depth of columns to be provided. The risk assessment needs to be updated with this information.
2. Risk of turbidity from boring and low-pressure injection of concrete.

The physical nature of boring columns can create turbidity in groundwater, particularly if the columns are going into the chalk aquifer. This presents a risk to water quality. Therefore the assessment needs to be updated to reflect this risk and consideration of how to minimise turbidity should be considered.

We agree that TRC recommends that a contractor implement a Construction Phase Environmental Management Plan to ensure the risk management actions are undertaken to reduce environmental risk. The designer should ensure that construction materials are compatible with the ground conditions encountered.

Subsequently it is Portsmouth Waters position that a condition is required, and do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 4:
Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

5. Construction Environmental Management Plan (CEMP)

We have reviewed the Construction Environmental Management Plan (CEMP), we support the appropriate management of overland runoff in accordance with the Environment Agency's pollution prevention guidelines. Additionally, we support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Conversely, limited information has been provided on how the wheel washing drainage will be managed this needs to be detailed in this plan to ensure appropriate management of this drainage. Furthermore details of hazardous material storage is required. We would also seek amendments to the on-site parking policy withing the CEMP such that it is specified no materials or vehicles shall be stored within the Root Protection Zones of any trees.

Subsequently it is Portsmouth Waters position that a condition is required, and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 5:
No development shall commence until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Further guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below: https://www.portsmouthwater.co.uk/developers/groundwater-protection/

Biodiversity

The development is adjacent to the existing Portsmouth Water Head Offices conservation area managed for Biodiversity by the company and is surrounded by multiple Tree Preservation Orders as well as areas of international and national statutory designations. Therefore, all measures to protect Biodiversity, avoid excavations within Root Protection Zones (RPZs), and meet the Biodiversity Net Gain (BNG) requirements during and post construction are expected. We do not object in principle to the proposed development, however the Catchment and Environment Team wish to be consulted on any further amendments to the final design and plans for the site and provide the following comments for consideration.

Given the sites proximity to and surface water drainage discharge upstream of nationally and internationally important designated statutory sites in Langstone Harbour – RAMSAR, Solent Special Area for Conservation, Special Protected Area, Special Site of Scientific Interest, and Priority Habitats - it is the Catchment and Environment Teams position that a regulatory Habitat Risk Assessment is required.

Tree Preservation Orders

The Catchment and Environment Team does not object to the removal of the 8 trees highlighted in the Planning Layout. However we would like to highlight three issues:

1. Two trees requested for removal located on site look to have been removed several years ago when the existing access road was installed. We therefore seek clarification in regard to which trees are intended for removal within TPO group 5.
2. Within documentation associated with this application there has been no mention of how during and after construction the Root Protection Zones (RPZs) of the trees will be protected. We would expect such references to be made in the CEMP and planting plan - especially as TPOs are in effect on the site. We therefore expect the CEMP and Planting Plan to be revised to consider RPZs.
3. Under the Foul Water drainage strategy, the sewer main is to be relocated in the south-west of the site. This relocation and associated easement will encroach within the TPO group areas G2, G1 and G5 and the protected trees associated RPZs. This proximity risks causing damaged to the trees, undermining BNG obligations and potentially violating TPOs.

Furthermore we are concerned it creates a groundwater quality risk in SPZ1 as future root ingress by trees proposed under the Planting Layout may cause damage to the sewer main. Subsequently we request Condition 2 is imposed.

Site Layout

The Catchment and Environment Team have reviewed the Planting Layout Plan and Bird and Bat Box Layout Plan. We request the Management Plan for the Landscaped areas and Planting Layout is forwarded for review, comment and agreement once they have been amended to address the following concerns:

• We object to the application of any agrochemicals on this site from a water quality protection perspective. This is because the site is located within SPZ1 of the groundwater catchment, in close proximity to potable water abstractions and a watercourse which flows into Langstone Harbour Area of Outstanding Natural Beauty. Portsmouth Water require written assurances no pesticides will be applied on the site during and after construction.
• Within the Planting Layout Maps many 'proposed trees' are to be planted within the Root Protection Zones (RPZs) of existing trees. The Planting Plan is therefore unacceptable to the Catchment and Environment team as planting within RPZs may invalidate the BNG requirements. This is because planting within RPZs risks damaging existing trees and habitat and the close proximity will impede the ability of the proposed trees to grow healthily such that they are able to provide habitat. Subsequently a revised Tree Planting Scheme is required to address current inadequacies.
• We oppose the planting of non-native species, and species that are not climate change resilient. This includes the planting of cultivar species which do not contribute to BNG requirements.
• We do not support the planting of inappropriate species for the site that are of difficulty to manage and rapidly infringe onto other habitats. Subsequently we oppose the inclusion of Blackthorn (Prunus spinosa) in the planting plan.
• The Catchment and Environment Team are not satisfied with the Bird and Bat box layout plan as it does not contribute sufficiently to BNG requirements. A total of two Bat boxes, Swift bricks and nest boxes each is not nearly sufficient. We note there are no proposed boxes or bricks on the Proposed new Portsmouth Water Head Offices, this is unacceptable in terms of the BNG requirements. We expect the quantity of Bird and Bat boxes to be increased and included in the new Portsmouth Water Head Office building. We also advise inclusion of Bee bricks and Bat Bricks is considered.
• The 'plant beds' and 'grass areas' proposed in the Planting Layout cover such small areas they would be difficult to manage correctly. This is because tractors and most mowers cannot fit onto such small areas, and their ability to do so is further impeded by the high concentrations of proposed trees and the lack of access without driving over plant beds. We expect areas to be of a suitable size to allow them to be managed effectively in a realistic timeframe. Portsmouth Water seek amendments to the planting layout such that areas are of an appropriate size to manage and minimise the risk of misinterpretations being made that may result in habitat loss through deviation from the planting layout during maintenance.
• Finally we support the inclusion of solar panels on the new Portsmouth Water head office roof. This will contribute to the companies 2030 net zero target to mitigate climate change and their appropriate location does not disrupt habitat. However we are disappointed they cover such a small area of the roof and wish this is reviewed to increase the roof area covered by solar panels to optimise renewable energy output.

Further Comments:

15.11.21

We have no further comments to make on this application from our previous

correspondence dated 17th August 2021.

Further Comments:

Updated 17.08.21

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Our Position

The development lies in a very sensitive groundwater location due to underlying principal aquifer. The site is located within the Source Protection Zone One (SPZ1) for an essential Public Water Supply Source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

We do not object in principle to the proposed development, however due to the sensitivity of the groundwater environment we wish to be consulted on the final design and plans for the site. Our concerns regarding groundwater quality protection can be addressed through the addition of appropriate planning conditions to reduce the potential risks posed to groundwater.

Below are the 5 planning conditions we would wish to be implied should permission be granted:

Condition 1 – Surface Water Drainage

No development shall take place until a surface water drainage scheme, based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied. Details of how the scheme shall be maintained and managed after completion shall also be included.
***Reason** - To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.*

Condition 2- Foul Water Drainage

No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme. The scheme shall also include:
• details of how the scheme shall be maintained and managed after completion.
• details of the sewage pipe work layout and specifications.
***Reason** - This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.*

Condition 3- Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences. ***Reason*** *- To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.*

Condition 4- Piling & Foundations

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.
Reason*-To ensure that any proposed Piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework, and position statement N8 Physical disturbance of an aquifer in a SPZ1 of the 'The Environment Agency's approach to groundwater protection'.*

Condition 5- Construction Environmental Management Plan (CEMP)

No development shall commence until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.
Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs

Supplementary information

Drainage

The Flood Risk Assessment outlines the proposed surface water drainage strategy. The proposed surface water drainage strategy is the use of SuDS features with a controlled final discharge to an existing watercourse. The proposed SW drainage system is designed in accordance with CIRIA C753 and appropriate treatment is proposed. This is acceptable in relation to groundwater protection. We would wish to be consulted on the final surface water drainage design details and plans.

The proposed foul water drainage strategy is the connection to an existing main sewer, this is acceptable in relation to groundwater protection. We would wish to be consulted on the final sewer design details and connections.

Construction Environmental Management Plan (CEMP)

We have reviewed the Construction Environmental Management Plan (CEMP), we support

the appropriate management of overland runoff in accordance with the Environment Agency's pollution prevention guidelines. Conversely, limited information has been provided on how the wheel washing drainage will be managed this needs to be detailed in this plan to ensure appropriate management of this drainage. Furthermore, details of hazardous material storage is required we note that this will in accordance with the Environment Agency pollution prevention guidelines, however details of storage on the site is required.

Piling & Foundations

The proposed site is situated in a sensitive groundwater catchment and there are potential significant risks associated with groundworks in this area. There would be a presumption against piling at this location. If the piling was the proposed foundation solution, no piling shall take place until a piling method statement and risk assessment (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, vibration and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water's Catchment and Environment Team.

Any piling, if proposed, must be undertaken in accordance with the terms of the approved piling method statement.

Solution features

We support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Land contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. Elevated concentrations of copper and Nickel have been identified in the groundwater samples, however there is no plausible on site source of Copper and Nickel on the site and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds would be required to ensure these are structurally sound and provide appropriate mitigation.

Further guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below: https://www.portsmouthwater.co.uk/developers/groundwater-protection/

Southern Water

Further Comments:

20/09/23

Please see the attached extract from Southern Water records showing the approximate position of our existing public foul sewer within the development site. The exact position of

the public asset must be determined on site by the applicant in consultation with Southern Water before the layout of the proposed development is finalised.
- The 225 mm diameter gravity sewer requires a clearance of 3 metres on either side of the gravity sewer to protect it from construction works and to allow for future maintenance access.
- No development or tree planting should be carried out within 3 metres of the external edge of the public gravity sewer without consent from Southern Water.
- No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of public or adoptable gravity sewers.
- All existing infrastructure should be protected during the course of construction works.

Please refer to: southernwater.co.uk/media/3011/stand-off-distances.pdf

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains and any such proposed assets in the vicinity of existing planting. Reference should be made to Southern Water's publication “A Guide to Tree Planting near water Mains and Sewers” (southernwater.co.uk/media/3027/ds-tree-planting-guide.pdf) and the Sewerage Sector Guidance (water.org.uk/sewerage-sector-guidance-approved-documents/) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service: developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

water.org.uk/sewerage-sector-guidance-approved-documents/

ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by the Local Planning Authority in consultation with Southern Water.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Further Comments:

31.03.22

The comments in our previous response dated 11/11/2021 remain unchanged and valid.

Further Comments:
11.11.21

The developer is currently in consultation with Southern Water with regards to entering a sewer diversion agreement under reference DS_DOS-118128. The details of the proposed diversion needs to be agreed and approved by Southern Water before implementing on site.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public foul sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service: developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

The submitted drainage details indicates the SuDs to be maintained within private ownership and maintenance.

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDs component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

water.org.uk/sewerage-sector-guidance-approved-documents/

ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme. - Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

Land uses such as general hard standing that may be subject to oil/petrol spillages should be drained by means of appropriate oil trap gullies or petrol/oil interceptors.

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Further Comments:

We note that the Environment Agency (EA) raised objection to this planning application and the applicant has been in touch with the EA in order to overcome their objection. As our formal response stated: we request fully written agreement from the (EA) for the proposals including the hydraulic modelling and flood alleviation works.

Our formal response requested additional information which has not been included with this re-consultation:

- Detailed drainage layout drawings at an identified scale indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths, and gradients.
- Detailed network hydraulic calculations for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage features including the discharge location. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage features should have the same reference that the submitted drainage layout.
- Additionally, and since the proposed outfall will be within the fluvial flood extent, the hydraulic calculations should include a surcharged outfall equivalent to the predicted 1 in 100-year flood level showing how that event will be managed safety.
- Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
- Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

Therefore, our formal response dated 05th August 2021 still stands.

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ANNEX B

Land north of Solent Road (adjacent to Bosmere Medical Centre) Havant APP/21/00601

Summary of Representations Received:

Concerns relating to patient safety and accessing Bosmere Medical Centre (BMC)

Medical centre wrongly located, should have been built in residential area, reducing need for patients to travel by car.

We don't want Southern Water units next to GP practice ***Officer Comment:*** *Proposal for Portsmouth Water.*

2,100 scheduled face to face appointments and 500 e-Consult appointments, weekly footfall through medical centre significant.

If the other way around, would not build a doctors surgery on land surrounded by water supplier/management company premises / industrial estate. ***Officer Comment:*** *Industrial buildings removed from scheme.*

Already hard to get a GP appointment, without added pressure of missing it because you're stuck in traffic.

BMC already difficult to access by public transport, increased traffic will make the building more stressful to navigate safely.

Vulnerable patients need to park close to BMC, increased traffic may make this impossible.

Availability required for emergency appointments for the South Coast Ambulance service, these regularly impeded during peak times - would delay access for emergency vehicles.

Pollution from queues of traffic would be at an unacceptable level, impacting patients health.

Added stresses may put off medical patients from seeking medical attention.

Inconvenience caused to c20,000 retired patients / service veterans would be considerable.

Why is the PW access more dominant than the Bosmere Access? Bosmere should have the primary access with PW a secondary access.

Dangerous & on doorstep of busy pharmacy - area serving patients Monday-Sundays, at lengthy hours.

Bosmere Pharmacy (BP) is busiest operating in Havant Borough Council area. When no traffic on this road, vehicles drive too fast for patients crossing road to the medical centre.

Servicing local NHS and Hospice patients both face to face and through direct deliveries.

Why compromise patient care – pharmacy dispensed end of life medication to dozens of residents daily.

In families last moments with loved ones, causing strife through delay of vital pain alleviating medication because of application.

Patients deterred from using and vital local business will suffer. If patients leave the practice, BMC may have to close.

Seeking commercial gain at the compromise of patient safety and patient healthcare needs.

Not in the interests of Medical Practice patients and their needs.

The development will impact on the hygiene and sanitation of the surgery.

Concerns of vulnerable patients crossing over the proposed access.

Access for sick and disabled people ought to be protected.

Complaints that existing traffic lights impede access to BMC appointments.

BMP at full capacity and cannot take on any new patients with 135 houses being built.

In case of sick, elderly, infirm and underage patients, many require car or taxi transport.

Impact on working conditions for staff at BMP.

Pharmacy is already busy and not safe for increased traffic.

Proposed buildings overlook patient examinations, loss of patient privacy.

Proposal will affect the access to the adjacent Boots.

Impacts on pedestrian use of Solent Road

Impact on pedestrians using Solent Road.

Increased quantity of traffic interacting with traffic lights on Park Road South, used as a crossing point for students at Bosmere Junior School.

Children at the nursery will be at risk due to increased traffic.

Potential effects to the pedestrian crossing at the far end of Solent Road.

Why not create pedestrian footpath from West St, through PW for access to HQ & BMP?

Impact of works on alternative transportation.

Traffic will have an impact on safety for those riding horses.

Concerns about cyclists taking corner to access road to Portsmouth Water.

Focus on improving cyclist access & road provision, few of those using BMP using bicycles.

Concerns relating to surveys/assessments

TA does not pay attention to unique traffic generation profile of BMP or pharmacy business.

'revised' Transport Assessment continued to existing traffic generation profile at site.

Timing of traffic survey not representative, survey needs to be done at all times of day.

Data to 'support' planning ludicrous – not accurate, true or representative of what occurs on Solent Road and in car park adjacent to Pharmacy.

Expect to see an independent flood risk report, not one paid for by Portsmouth Water.
Officer Comment: *Report assessed by Statutory Consultees.*

No evidence of future projected traffic flow increase.

Relies on original traffic survey, performed over six-hour period on 4 November 2020 during the Covid pandemic - not an accurate representation of regular traffic usage.

The Traffic survey needs to include people accessing the pharmacy each day, not just the number of daily GP appointments.

Large amount of money has been paid to provide favourable environmental assessments.

Increased risk of Road Traffic Incidents

Preoccupied employees of PW will not take necessary care using the access road by BMC.

The area will become an accident hotspot.

What does it take for common sense to prevail will it be first death when elderly driver comes off worst from HGV.

Concerns relating to congestion

Havant will be in grid lock if and when New Lane Distribution Hub goes ahead. ***Officer Comment:*** *This refers to a different development now in operation.*

Peak commuting times coincide with busiest appointment times at the medical practice.

Narrow road used thousands of times/day, increased traffic - adverse effect on those accessing the surgery.

HBC and their advisers seem to excel in poor traffic management.

PW to route all building work traffic plus future business traffic to new HQ (with no less than 100 parking spaces) using existing dedicated access road to the Bosmere Medical Centre.

Solent road is too narrow for use by HGVs.

There are already HGVs which stop within the road when they can't find where they're going.

No one can get to the shops because of congestion.

Traffic congestion in area, massive build up in Solent Road subjects all to mental strain.

Congestion already worsened by traffic lights and level crossing.

Traffic affected by Bedhampton Level Crossing & Solent Rd queues especially at peak times.

Not much done in regards to the added amount of traffic this will cause, both during & once the work has completed, large vehicles needed to transport equipment & building supplies.

House building in the area has increased traffic over the years.

Does not take into account impact on patients struggling with road/traffic access to surgery.

Vehicles parking on either side of the main road leads to single file traffic.

Traffic congestion increased during summer holidays & sunny days, making commuting more difficult during these times.

4 industrial units would increase traffic congestion. ***Officer Comment:*** *3 units removed.*

Traffic flow is already hampered by Bedhampton Level Crossing.

Solent Road traffic levels – thought of vast numbers of cars accessing PW site from Solent Road will cause utter chaos to already over used road.

Traffic congestion may impact carers access to their patients.

Widening the access road will not mitigate the impact of the proposal on congestion.

Not cause more chaos on arguably one of most congested pockets of roads in Hampshire.

Increased frustration from drivers may increase the risk of accidents.

Very likely to lead to more congestion back into Solent Road – not good for traffic flow

Increased traffic will lead to patients registering with alternative GP surgeries.

Proposed Plan would create greater taxation on an already overtaxed road system.

Brockhampton Road and West Street used as 'rat runs' for motorists.

Traffic congestion may impact carers access to their patients.

Doubling size of Solent Retail Park & addition of Solent Trade Park, traffic often gridlocked, additional homes on the PW site will increase traffic. If each home has 2 cars owners, that's a possible 270 cars using Solent road daily, plus cars from PW. **Officer Comment:** The proposal does not include residential development.

Brockhampton Road and West Street used as 'rat runs' for motorists.

Solent Road suffers when articulated lorries deliver to industrial units, blocking the road.

To allow any development on a congested site an act of civic disregard for local population.

Obstruction to Solent Road

Traffic and parking issues have increased following the opening of SSE site.

HBC should be taking measures to relieve traffic, not increase it.

HBC Planning role is surely to improve the area, not create more chaos on the road. Observe the area before making a disastrous decision.

Proposal serves no useful purpose - creates a major log jam at key moments in the day.

Already significant problems with traffic flow to / from site & pedestrian & patient safety will be compromised. Existing traffic flow problems need to be addressed.

One breakdown or accident can lead to gridlock in Havant.

Cars regularly divert from West Street to Solent Road, this will create an increase in traffic

Congestion will already be made worse when Home Bargains is opened.

Havant is a busy town which cannot cope with further development.

Concerns relating to potential future works

PW continue to drive through their Development Masterplan through piecemeal planning applications which fail to disclose their wider interest to the public.

What type of industry would be allowed to occupy the proposed units? ***Officer Comment:*** *The proposal is for PW headquarters building in Use Class E(g)(i) use which is a Use which can be carried out in a residential area without detriment to its amenity – Offices to carry out any operational or administrative functions.*

Without understanding overall plan, planning committee unable to assess impact of this sub-plan.

Repeated apps - no clear planning for access to whole site. Be honest with plans rather than hiding them.

Lack of transparency shown by HBC is unacceptable

The garden planted to the west of the offices will prevent traffic from housing accessing Solent Way -will have to use overcrowded West Street. Already been made up by the developers, but not explicitly declared. Will be presented as a fait accompli later.

Application part of wider plan- unpublished. In absence of complete knowledge, impossible to judge if it represents sensible compromise with other requirements of wider development.

Portsmouth Water continually mislead council over plans, the HQ build, or the Reservoir.

Concerns that the proposal includes an unsuitable amount of housing for this area.

The remaining land on the plans, who has this been sold to and what are the plans for this?

Impact of 135 new homes on queues at Bedhampton railway crossing.

Drip feeding applications in this manner is an attempt to avoid legitimate scrutiny.

Additional information primarily to address ecological matters, not fundamental question of proposed use of the access road to BMC. Other fundamental revision - absence from the proposal of the western section of the site. Has idea of 3 Commercial units been dropped altogether? If so, what is to happen to that vacant plot? ***Officer Comment:*** *There are no current proposals for development in this area which would be subject to a separate planning application.*

The piecemeal nature of the application & limited details of 100+ houses to be built on the site leaves residents in the dark. If each home has 2 cars owners, a possible 270 cars using Solent Road daily, plus cars from PW. ***Officer Comment:*** *Not part of this development.*

Withdrawn proposal for commercial units will resurface & will be approved by HBC.

Widening road for articulated lorries suggests intention to establish industrial units on site, which had been dropped from a previous application.

Other than stating existing office building will become a brownfield redevelopment site, no mention has been made of what is proposed there. Whomever wishes to redevelop that site will have to commence a new, separate planning application.

Plans to relocate PW offices are clear, no clarity for the rest of the site & large number of houses proposed for it. Where is the detail and planning for this*?* ***Officer Comment:*** *Any redevelopment of the existing HQ would be subject to a further planning application – The area is however allocated for residential development under Havant Borough Local Plan (Allocations) 2014 policy HB1 Ref: H14 with an indicative No. of 120 dwellings.*

No mention of what will happen to the existing PW HQ. in the draft Havant Borough Local Plan 2036, this is earmarked for housing, specifically c135 dwellings. ***Officer Comment:*** *This Draft plan is now with withdrawn – see above officer comment.*

This revision is an attempt to fool the public that the industrial site won't go ahead. They will reapply to build the individual units.

New road layout is over constructed. Offices should not need articulated lorry access.

Parking related concerns

The council only permitted 34 parking spaces for over 19,000 patients at BMC. ***Officer Comment:*** *The original planning permission Ref: 03/61715/001 included 35 parking spaces for patients and 19 for staff (54). The current arrangement provides 44 parking spaces for patients and 14 staff parking spaces (54).*

People who work in Havant regularly park in residential roads, inconveniencing residents.

Request applicants provide, for public use, free public parking if development to proceed.

Brockhampton Road used as a carpark for office workers, derelict and stollen vehicles, parking for heavy vehicles. Weight limits are ignored by HGVs, drivers speeding.

Traffic and parking issues have increased following the opening of SSE site.

Land to the West of BMC should be reserved for staff and patient parking.

Junction at Solent Road & entrance to car park, not service/distributor road – parking manoeuvres frequently cause hold ups.

The new buildings should have their own access.

Existing difficulty turning into entrance and dodging vehicles coming out.

Existing BMC carpark being used by shoppers and workers at the expense of patients.

Concerned about access to BMC when building work is going on. Not enough car parking at the medical centre for patients, deliveries would be unsafe with extra traffic.

What controls will be put in place to stop employees using BMC as an overflow carpark?

Current entrance & carpark to BMC not fit for current usage, proposal will make this worse.

Concerns that PW staff will park within the medical centre's carpark.

Patients can barely get into the entrance to car park – congested with cars arriving & leaving daily. Own car hit by someone exiting road.

Nowhere for Pharmaceutical supplies to park, & patients parking on grass verges or obstructing other cars- to collect vital medicines.

Inadequate parking at practice, often vehicles waiting for space, frequent supply/collection vehicles forced to double-park or park in blanked turning area.

Carers/district nurses, & Rowans Hospice don't have 2 minutes to try to get in & out of road/ find parking.

I would like PW to offer the area to the West as additional patient parking for BMP.

Average Household has 2-3 cars, where will they all park? ***Officer Comment:*** *This is not a residential development.*

Where will the staff for PW park?

The application should be amended to provide exclusive access to the BMP car park.

Insufficient parking for proposed developments will lead to spill over in Practice car park.

Suggestions in relation to alternative works and the Portsmouth Water Site

The water Company should be located near the tip where there is spare land.

Should the HQ of PW not be in Portsmouth itself?

Proposed offices should be downsized for number of staff expected, Staff working remotely don't require as much office space.

The building should be within Langstone Technology Park & new slip road added from A27.

Applicant packing maximum development in to the available area.

Don't want another Amazon type development close to the town centre. PW can have a small office in centre of Havant for bill payment and customer queries etc.

Why have PW suddenly wanted to build new Head Office when nothing wrong with original one. PW should look at the abundance of vacant buildings/sites to house their new offices.

Access from Brockhampton can be used by closing Brockhampton road, with a diversion.

Use the area & entrance from current PW building & make it a multi storey car park for employees.

This proposed area would be better used as peaceful space or to extend Medical Practice.

More appropriate sites with easier access for a PW HQ e.g. Dunsbury Park, Broadmarsh.

Housing development would most appropriate land use, not B2 and B8 warehousing. Would help the council to reduce shortfall in the 5 year housing supply target.

The location too close to main shops and industrial estate. PW can extend their current offices, no need for all new building, no need for buildings at all for anything.

Bypass should be built to divert additional traffic to the A27 without going through town centre. If not feasible, out of town solution should be sought with plot used for housing.

There must be another site, why not the empty land by the industrial estate or where Colts used to be? PW should consider empty office space.

Current office owned by PW is probably not much older than 60 years - a short life. Has it been good value for money, does PW has a strategic vision for its new proposed office, or will we be here again in 60 years time.

Why more warehouses? Empty units in Harts Farm Way, empty shops in Solent Retail Park. Empty offices in Basepoint and Waterlooville. Amending the industrial units to have the service side facing away from BMC would reduce the impact on patient care at BMC. ***Officer Comment:*** *The 3 industrial units have been removed from the application.*

PW should consider moving their proposed HQ location.

If some of the land originally earmarked for industrial units were used to improve access to new buildings & carparks, would reduce congestion & take pressure off people trying to access the medical centre carpark.

Any approval must allow for future expansion of BMC.

There are many opportunities at Harts Farm Way, PW should move there instead.

There are other brown field sites that would be safer and more pragmatic.

Council should assist in finding a more appropriate location for PW HQ.

There is no industrial use around this area and nor should there be it is a residential area.

Suggested alternative access to Portsmouth Water site

PW should use one of their existing entrances, not share the entrance with BMC.

If PW can afford works to modernise HQ, can provide access to the site for their own use.

Financial contributions to provide cyclist access don't overcome need for alternative access route.

A new road for the surgery should be made opposite Marks and Spencer.

If the site is not viable for commercial development, they could address traffic concern by building a dedicated site road across it and allocate more parking to the Medical Facilities.

Would not be considered if it were to share an entrance to a hospital, essentially same thing.

Other alternative access points for the site which could be used.

There is no slip road, nor is one proposed.

New entrance should be made for BMC along their existing boundary hedge in Solent Road.

Why do PW think this is acceptable route, why not separate route from Brockhampton Road.

There must be a separate access to the PWC office.

Using access to the medical practice is unnecessary, a different access road could be used.

If alternative access from west of the industrial units/new offices not viable option, why was permission granted for PW to demolish a wall & make access from Brockhampton Road to their yard?

Must be other entrance points, or ways to create access without damaging the pharmacy.

Consider alternative approach – access to Medical Centre from Brockhampton Lane?

PW already have numerous connections to the road way system to optimise.

Water Authority can easily make new entry road.

If it can't be moved, consider another way in & out taking traffic away from centre of Havant.

Given 'industrial units' removed suggest independent road for access – understand problems of too many access points onto major road but 'special' status of medical centre should be recognised.

Finishes and external materials, visual amenity

Design of buildings/industrial units uninspiring, negative impact on residents' mental health.

Proposed building in yellow and black, looking like a big wasp. Nothing in the area is that colour, building would stand out like a sore thumb, blue & grey seems more common colour.

Industrial proposals would be an eyesore.

Painting industrial units green does not mitigate the impact on wellbeing of residents of Manor Court.

Environmental concerns.

Damaging nature for the sake of company that damages nature further by polluting streams and waterways in the area.

The ‘green lung’ that helps the wildlife in Havant will be obliterated.

There is a great risk of industrial pollution.

Should take Climate Change seriously, increased pollution & removal of trees will have negative impact.

We need to keep as much green space in Havant as we can. With Havant Thicket losing its trees to the reservoir, we cannot afford to lose more green spaces.

PW already have an HQ in Havant, building a new HQ will increase their carbon footprint

Why does site have to move to an unspoiled green area, will be no areas of nature soon.

Overdevelopment of 2 green sites.

Developers should not be allowed to profit from development on green field sites, a brown field site should have been chosen.

We can’t keep losing trees, green spaces and ponds, biodiversity should be preserved. Southern Water have already damaged local wildlife with a new reservoir. ***Officer Comment:*** *This application is for Portsmouth Water.*

The environment needs trees to stay and not be felled to make way for parking.

Dirty vehicles traveling in and out of the road will be bad for the environment.

Should only be granted with condition that when PW move to their new HQ, their old HQ is demolished and turned in to a public park/water garden/wildlife sanctuary.

Impact on pheasants, foxes and swans.

The green space is used annually by migrating birds (Canada Geese).

Loss of the established pond will impact ducks, frogs, newts, field mice, voles, damsel flies.

Herons and Egrets nest in the trees, established trees and hedgerows will be removed

Existing ponds are rich in wildlife, destruction of habitats

The use of green space for new development should not be taken lightly.

Building here will destroy wildlife.

Concerns regarding the impact of the proposal on bats and roosting birds.

Stop building on Green Land.

Concerns around potential smells and fumes from traffic and industrial units.

Surrounding Manor Court on 3 sides with industrial sites will add to dust & soot in the area.

Havant has become increasingly built up and green spaces are rapidly disappearing.

Are the ponds and land of environmental relevance?

If this project goes ahead, residents of Brockhampton lane would be surrounded with carparks. Proposed impacts to health from proximity to carparks.

Lack of correspondence from the Planning Authority / Developer

Waiting for decision from HBC on rules stating acceptable distance for new industrial units built adjacent to established residential properties. Precedent that distance of 92 metres was the acceptable distance from the 32 New Lane development. ***Officer Comment:*** *The industrial units to the west of the access have been removed from the application. Impacts of the proposal are assessed in part 7 of the Officer Report.*

There has been a lack of response from the Authority to letters submitted by BMC.

Transport Access points raised by Patients' User Group appear to have been selectively ignored.

When attending a planning meeting years ago, it was said that affected residents were visited by PW to discuss plans, no residents of Brockhampton Lane were contacted. ***Officer Comment:*** *This is a matter for PW.*

Told by a member of PW staff that the proposals 'won't affect you anyway'.

I do not feel that concerns regarding access to BMP properly reviewed and considered.

At no time has developer or their Transport consultant had any engagement with either health care provider.

Response from Hampshire Transport Planning is inadequate and dismissive of concerns.

HBC and HCC have not considered the existing site use in any depth.

Impact on TPO Trees

Why protect tree with TPO if allowed to be cut down? Planting new trees not good substitute for established trees on landscapes & habitats. If you have enough money, can cut down any trees you like. ***Officer Comment:*** *Impact on trees is addressed in the officers report*.

We need these trees to help with all the pollution, Air quality in Park Road South is poor.

Are they not happy with felling Havant Thicket? Leave the trees alone.

Loss of nesting areas and biodiversity.

How is this allowed when private residents within Conservation Area required to apply for permission to prune trees on their property?

Flood Risk and Drainage

Building on potential flood plain can only make the potential for serious flooding much worse. Where will the surface water go as increased impermeable area will create higher flood water level. ***Officer Comment:*** *See officer report.*

Southern Water cannot cope with wet weather flow and now it seems dry weather flow.

We have been told we are in a high flood area by our insurance company.

Flooding an issue on this field, a building requiring a large footing not going to help situation.

If works approved, works should be carried out to improve sewage & water drainage on site.

In 2023, the medical centre was puddled & frozen due to tarmac carpark built on a field. Existing drains & ditches have not been kept clear.

Flooding risk questioned.

Concerns of the impact of tarmac on flood risk.

This plot of land floods every time there is heavy/moderate rainfall.

Much of the field is below the water table in winter with the streams in full flow.

Have PW provided satisfactory storm drainage & utility backups for when this floods?

The only way to counteract flooding is by keeping the area clear and planting trees.

Site in Flood Zone 3, significant surface water experienced around the site & BMC

Climate Change induced flooding across Europe this summer.

Surface water soaks through soil overloading drainage ditches & overwhelms drain system.

Diverting water into Brockhampton stream not permitted, runs through Manor Court. PWC do not own this stream, additional drainage would be against the law.

Original Culvert modified at North of the proposed site, water will run downhill towards BMC & Solent Road.

Concerns of building too close to the water course.

Introduction of concrete on a flood plain will increase flooding in the surrounding area.

Inadequate Proposed mitigation.

Individual FRA's rely on the assumption that there will be no further building on the site.

The sewage system is insufficient for the current population & there are frequent blockages.

The removal of trees is likely to impact flooding.

Manor Court flooded with sewage on many occasions because the field gets flooded in heavy rain and the drainage system cannot cope. The sewer pipes get blocked.

Sewage works can't cope, overflow pouring into sea. No further house building in this area.

Flood Risk modelling concerns need to be satisfied with EA and Planning Policy Consultees.

Noise

Noise of development & plant works may impact doctor appointments, particularly for those with hearing loss.

The proposal and increased congestion will generate noise within the area.

Manor Court will be surrounded by noisy traffic

Increased noise from plant works would be disruptive to patients at the medical centre.

Industrial units close to residential homes - noise of machinery from units all day, 5/6 days a week would be intolerable. ***Officer Comment:*** *The industrial units have now been removed.*

Current units in Solent road have frequently sounding intruder alarms which sound for hours at night. Noise closer to residential properties would be frightening & disruptive to residents.

Noise impacts of industrial units, cars, reversing beepers, AC units, motorised shutters.

Noise impact assessment assumes noise created by construction & operation would not add to existing noise levels, assessment of one 24 hour period in winter not representative of sporadic noise.

Existing noise from Anti-social behaviour.

Concerns relating to land ownership

The application fails to register BMP as an interested party.

BMP hold a lease of their site from PW, who I expect retain their freehold interest.

I do not know what provisions exist in lease that would allow developer to enter the land & carry out widening works, believe it would be possible for BMP to prevent current application by not cooperating with the developer. ***Officer Comment:*** *This is a matter for the parties.*

Widening existing access would require purchasing of the verge on Western edge of the road. This would require the agreement of BMP. The appropriate Ownership Certificate B would be required Section 66 of the TCP Act 1990. ***Officer Comment:*** *The west side verge is shown as highway land and the Highway Authority raise no objections.*

Impact on Light

What trees proposed as some are close and may reduce light to my property? ***Officer Comment:*** *Should permission be granted would be subject to a landscaping condition to control planting.*

If approval is granted, residents will pursue Right to Light. **Officer Comment:** It is understood this related to the industrial units now removed.

Tall buildings reducing light for neighbouring properties.

Loss of uninterrupted light due to tall buildings near to residential dwellings.

Trees shown within the proposal will further reduce light for neighbouring properties.

We would be subjected to Light pollution from the lights around the units at night.

The size of the building will block natural light, views and air movement in to my property.

Impact on amenity

Currently uninterrupted views across field. We enjoy the benefits the trees & wildlife bring to this area. Never had to endure traffic noise just metres from bedrooms. Quality of life negatively affected if building gets approved.

Trees planted to obscure residents' view of buildings will show obtrusive industrial buildings following yearly leaf fall. ***Officer Comment:*** *Industrial units now removed from scheme.*

Impact on resident privacy

Concerns re. impact carpark will have on residents privacy, lighted area with a carpark to race cars on a target for undesirables. ***Officer Comment:*** *The site would be gated.*

Objections to industrial warehouses overlooking residential properties. ***Officer Comment:*** *The industrial units have been removed from the scheme.*

Waste management

Why are the bin sheds not behind building, instead of the front, in the view of Manor court residents? ***Officer Comment:*** *The bin store would be enclosed and set well off the residential properties.*

Congestion on the road restricts access to waste collection vehicles, bins aren't collected.

Impact on public infrastructure

Where will children go to school as there is a lack of places in the immediate area? **N/A**

Too many homes in the area without infrastructure. Planner should be educated on green living and no hassle environment. **N/A**

What infrastructure is being put in place?

Public Services are already stretched and will become even more so with hundreds more residents. **N/A**

Consideration should be given to surrounding homes & businesses for impact on infrastructure.

Building of additional housing in Havant will create more traffic than roads & drainage is able to cope with, especially sewage, that is being discharged into Langstone Harbour, Causing damage to our water quality. ***Officer Comment:*** *This is not a residential development.*

Overdevelopment in the local area without improvements to local infrastructure.

Impact of the proposals on local infrastructure, Health Care, Schools.

Nothing is built for the children of havant, yet mass building of private and association housed/units keep springing up. **N/A**

PW company and Waste Water concerns

Portsmouth Water recycling of waste water not acceptable & Southern Water should not be allowed to feed dirty water in to reservoir. ***Officer Comment:*** *No relevant to this application.*

PW can't treat their water supply and have an awful reputation for health and safety.

SW and PW have an appalling record regarding the environment.

Havant appears to be under attack from water companies.

Those who will benefit are so far away that for them Havant is just a dot on the map.

PW are one of the worst run companies.

PW no longer a family friendly business but an adventure capitalist company looking to capitalise on their investment, little care to people, animals and the environment.

If PW has money to spend on a new HQ, they should use that money dealing with horrendous waste water management and to reduce bills for lower income customers. ***Officer Comment:*** *Portsmouth Water do not treat waste water.*

Allegations

Allegations made in relation to HBC, political parties and Councillors

Impact on Listed Buildings/ Conservation Area (CA)

This proposal will bring operations closer to the Old Manor House, a grade II listed building.

Development will impact Manor Court, which is within the Old Bedhampton CA. Existing buildings are within the historical importance of the area.

Negative impact on appearance of Manor Court, including removal of trees, impacting the outlook of buildings in CA.

This small CA is swamped with traffic, access to another 200 or so persons at peek times will make life more difficult.

Witnessing the gradual desecration of some of our old and historic buildings

Public Consultation/Engagement

Members of board during public consultation condescending & lacking compassion.

Despite comments raised in the Development Consultation Forum (DCF) in October 2019, no relevant modifications to the design have been made.

Medical Practice & Patient Participation Group not invited to the DCF as an 'interested community group'.

Comments relating to general local over-development

The medical centre is more important to the area than new flats. ***Officer Comment:*** *N/A flats not part of application*

Why does every piece of land have to be built on?

Unnecessary housing in an overcrowded area. **N/A**

Havant & surrounding areas being surrounded by building of new homes, affecting wellbeing of existing residents. **N/A**

Havant keeps building more that its quota of homes, who has the money to buy them? **N/A**

Havant is bursting, no more buildings, houses or cars.

Council needs to stop Havant becoming a place of traffic congestion, large units, no green areas, and built up housing.

Another project by HBC, Havant Town is a national example of poor, short sighted planning.

Council building houses on every available site. **N/A**

Enough building works in Havant without moving waterworks. Perhaps they will take our park away one day.

No developments should be allowed until overcrowded roads in Havant Centre fixed.

Concerns regarding overpopulation of Havant.

Unrelated comments

Had trust in our council, - ignored by building accommodation/office space to increase the rates from residents.

Should redevelop Town Centre as housing stock rather than building on green spaces.

What compensation are residents to receive if this application goes ahead?

Council needs to look at their role regarding the environment & people who already live here.

HBC need to consider the needs of their constituents over big business.

Havant becoming unattractive place to live - anti-social behaviour & traffic jams in centre.

Complaint about BMC lack of appointments & government reaction to Coronavirus pandemic. ***Officer Comment:*** *Not relevant to this application*

Should be making Havant a better place for residents, creating more reasons to put people off visiting havant.

Maybe a park and ride scheme would be considered also?

Council should use time & money for this application to clean up Havant & look after the community.

Concerns about representation from Councillors

HBC showing disregard for quality of life for residents.

Local elected councillors should be local residents.

The people deserve better treatment from their elected representatives.

Relationship between revised and original application / previous Applications

Other than removal of Industrial units, nothing has changed within this new submission.

Previous objections of over 650 patients. The latest planning application does not address the traffic concerns.

Concern over previous consents. HBC continued to make traffic related decisions based on their models, however in practice these have underestimated the reality.

Other Matters

Concerns that works have already commenced for this application.

Expectation agreed plans will be adhered to, with minimal disruption to surrounding businesses/BMC.

Concerned that notification letters weren't sent to all neighbours ***Officer Comment:*** *Full publicity has been carried out.*

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