

Navigator Quarter, Land adjacent to Southampton Airport

RESPONSE TO ADDITIONAL LLFA COMMENTS

DOCUMENT CONTROL SHEET

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RESPONSE TO LLFA COMMENTS

This technical note has been prepared by Burrows Graham Ltd. on behalf of Blocwork (Eastleigh) LLP & Southampton International Airport Limited (SIAL) in response to the LLFA comment letter dated 21st April 2026 in relation to the planning application ref. SWM/2025/0457.

LLFA Comment dated 21/04/2026	Burrows Graham Response
We previously requested clarification on the catchment / drained area of the Northern plot and the access road. The above catchment plan confirms an estimated drained area for the Northern plot of 4.84ha. This corresponds with our assessment. The hydraulic calculations submitted for the Access Road and Northern plot network has a total drained area of 5.009ha, subtracting the drained area of the proposed access road this leaves 3.829ha. We therefore conclude that the hydraulic model is not representative of the proposed drainage system as all contributing areas for the Northern plot do not appear to have been included in the calculations.	<i>The catchment plans have been amended, along with the drainage strategy and hydraulic calculations to suit.</i>
Justification for the proposed discharge rate has not been clearly presented within the above report, but based on our review of the calculation of estimated greenfield runoff of 2.12l/s/ha and the submitted catchment plan, the proposed discharge rate appears to be appropriate. A detailed catchment assessment must be carried out to confirm the discharge rate if the project progresses to detailed design.	<i>Upon the detailed design for each phase, justification of the proposed discharge rate in relation to the actual catchment area will be provided, in accordance with the greenfield runoff rate of 2.12 l/s/ha</i>
We previously commented on the feasibility of the proposed drainage design for the northern plot. Please refer to our previous comments. We note tanks have been reduced in height and increased in plan area to ensure greater cover depth is provided. Shallow pipe gradients remain, which could be of concern for siltation risk and maintenance liability.	<i>It should be noted that we have currently presented an outline design with no detailed proposed levels for the plots. When the final development layout is confirmed we can provide a more detailed assessment of levels and therefore a more accurate proposed drainage model, at which stage we can assess if pipes are at risk of siltation and provide mitigation if</i>

	<i>required. There is a lot of detail that is dependent on the plot design, such as roof drainage, docks, channel locations etc. at this stage we have had to make conservative assumptions.</i>
We previously commented that no hydraulic calculations had been submitted for the Southern plot. Calculations are included in the above report. We are unable to verify the model report for the Southern plot as the network design table - links has not been included in the report. Likewise, the revised hydraulic model report for the Northern plot, does not include the links table.	<i>The hydraulic calculations have been updated to include the link tables, given this is outline design this is not reflective of the actual proposed detailed design. These considerations will be clarified at detailed design stage.</i>
Further topographical survey information is required in the locations of the proposed drainage outfalls. It is not clear whether the drainage strategy as shown is feasible. In particular the outfall level for proposed outfall 01 appears to be below existing ground level in this location. It is not clear whether it is feasible to drain unit 8 network by gravity as shown in the submitted design.	<i>The drainage strategy is outline, we have taken on board the comments from the ecologist to incorporate more natural drainage paths and locations which has results in 4 outlets across the site. Some of these are in areas whereby there is not detailed topographical information due to dense vegetation.</i> <i>However, we acknowledge that the strategy may need to be adjusted to allow for some pumped elements should the levels be higher than anticipated, this will be confirmed following the detailed plot layout and levels. We also note that pumped drainage is not the preferred solution. This will only be used as a last resort where required and there is no gravity option. Providing this can be managed appropriately as set out below, this will not impact the overall principles of the design and is generally considered acceptable.</i>
We understand ground levels are proposed to be lowered in some areas due to the building height constraints imposed by the proximity to the airport. Very little information relating to proposed finished floor levels and external levels has been provided. Based on the cover levels in the submitted hydraulic model, ground level	<i>As above, we have not provided detailed levels for the outline elements and do not believe that this impacts the drainage strategy materially. If the strategy requires pumps to discharge due to the levels this is a function of the existing site, all levels cannot be raised to mitigate this, it would not be commercially viable. This is not unusual</i>

lowering of approximately 1.5m – 3.5m is proposed in the area of Unit 10, unit 9 and unit 8. Although the modelling indicates that technically the site could be drained utilising pumped systems, this would not be considered to be in accordance with the principles of SuDS design. This type of drainage design is approved by exception only. Consideration of exceedance flood risk is required to assess the risk to the development.	<i>and we have worked on multiple sites whereby this strategy has been approved, including national significant infrastructure projects such as West Midlands Interchange and DP World London Gateway. The exceedance is also a function of the proposed levels design, and the final strategy will take this into account and ensure there is no restriction of existing flow paths through the site (there are non shown on EA surface water maps) and that levels will be directed away from the building. This also needs the final levels design to be confirmed and is typically conditioned.</i> <i>Where pumped solutions are proposed and utilised in the proposed detailed design solution, there will be a Duty/Assist pump selection with a spare pump for additional resilience, there are options for a secondary solar backup supply to the pumps in the event that there are power failures and it is important to note that all the pumps will be maintained regularly by the management company which we would expect will be onsite daily for a site of this size.</i> <i>There was further concern raised regarding emergency access, the emergency access is provided to the north of the southern plot across the airport runway, this location corresponds to the highest level on the southern site and is therefore not served by a pumped drainage solution.</i>
An exceedance flow route plan has not been submitted. We accept that this is a concept / outline stage design, but in consideration of the proposed land level changes, designing for exceedance should be taken into consideration at the earliest stages and prior to determining the application. Conveyance exceedance routes should follow the natural drainage routes through the site. The effect of lowering the land level to the depth proposed has been discussed	<i>As above, we don't have final levels for the plots nor a final layout. This can be provided at detailed design stage to ensure the proposed layout and design takes into account exceedance.</i> <i>Noting concerns from the LLFA regarding the plots being lowered and exceedance in extreme events not being able to flow off plot. This design of a lowered plot is not unusual for industrial warehousing developments of this nature. Most</i>

in depth in our previous responses, in relation to the proposed access road, and the same principles apply to units 8, 9 and 10. We consider there would be a high level of exceedance flood risk associated with the proposed design.	<i>industrial developments have a low lying 1.2m deep dock loading area which will always hold water in exceedance events until it overtops. Similarly, industrial developments of this nature are often designed so that they are lower than all external areas due to other considerations such as landscape/visual and noise mitigation, in this scenario there is no way to allow runoff to off plot areas in an exceedance event. Some examples of this are in Appendix A.</i> <i>It is important to note that the drainage system will be managed by a management company which will mitigate the risk of blockage as far as reasonably possible. The appropriate mitigation for this will be set out at the detailed design stage when the final proposals are known.</i>
As previously advised, site investigations have not been undertaken. The preliminary risk assessment included in appendix C of the above report is a desk based study, it describes previous ground investigation works undertaken within the adjacent airport site and provides recommendations for intrusive investigation work within the development site. Desk top study and previous investigations indicate that groundwater is in continuity with the river Itchen and that levels could peak within 3m of the surface. The LPA must consider the groundwater flood risk to the proposed development. Given the scale of ground level change proposed, we strongly recommend that winter groundwater monitoring is carried out prior to determination of this application.	<i>To date very limited Site Investigation has been undertaken, at which point a wider investigation is carried out, groundwater monitoring will be included and incorporated into the detailed design and subsequent reserved matters applications.</i> <i>If following monitoring, the groundwater level is higher than expected in areas following intrusive investigation the design will need to be changed to incorporate sufficient measures to mitigate.</i>

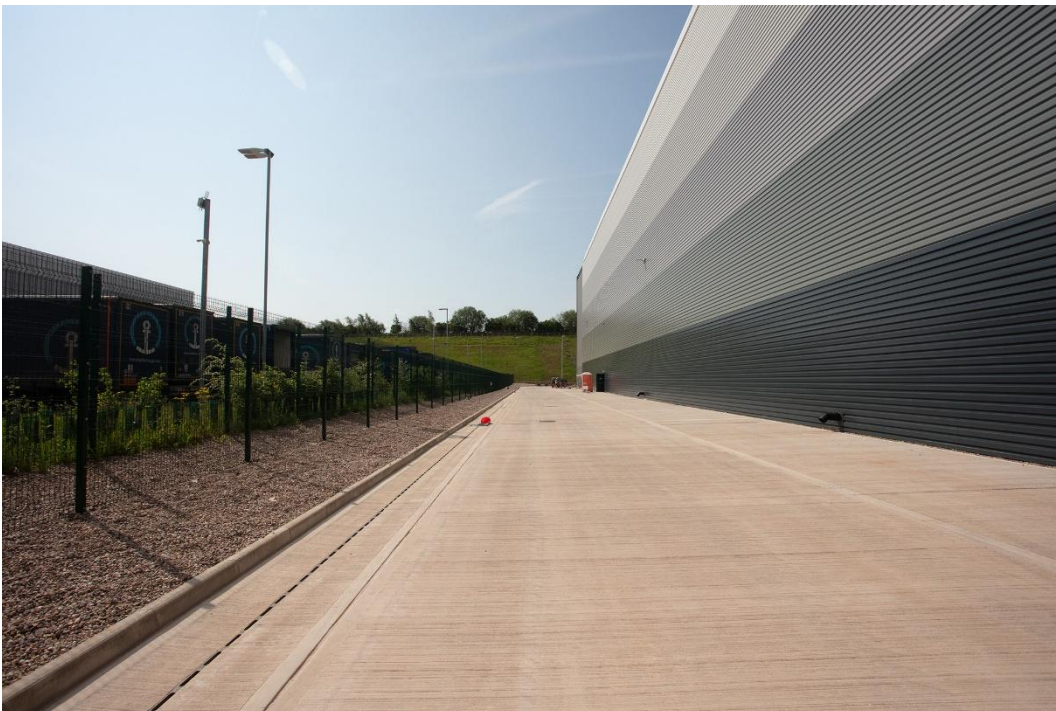
In view of the above, we believe that the comments from the LLFA have been addressed and as such request that approval is granted.

APPENDIX A

The following photographs are examples of sites which are generally artificially lowered to below existing ground levels and therefore there are localised low areas which will hold exceedance flows preventing them running naturally offsite or off yards/pavements.



East Midlands Gateway Rail Terminal



East Midlands Gateway Unit 5



DSV Brackmills



Wayfair Magna Park North Lutterworth