



Hampshire County Council

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Enquiries to	Scott Glover	My reference	SWM/2025/0457
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Date	18 June 2026	Email	swm.consultee@hants.gov.uk

Dear Sir/Madam,

Hybrid Planning Application - Outline application for development of the land adjacent to Southampton Airport to provide employment floorspace of up to 92,000 sqm (GIA) within Use Classes E(g) (ii & iii), B2 and B8 with ancillary offices and areas for service yards, car parking, landscaping, ancillary buildings and associated activities, and access from Wide Lane (all matters reserved except for access). Full planning application for initial infrastructure works and construction of new access road including site levelling and other engineering works. (EIA development) at Navigator Quarter, Eastleigh, SO18 2NL (Application No. O/25/99506)

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>

Director of Universal Services
Patrick Blogg

HCC as LLFA were consulted previously on this application and provided comments in our letter dated 11th August 2025, 14th October 2025, 18th March 2026 and 16th April 2026.

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

- Response to Additional LLFA Comments 30228-BGL-XX-XX-TN-D-00006 P02 Burrows Graham 18.05.26
- Amended Indicative Drainage Layout 2 30228-BGL-XX-XX-SK-C-00019 Rev P07 Burrows Graham 01.05.26
- Amended Proposed Catchment Plan 30228-BGL-XX-XX-SK-C-00022 Rev P02 Burrows Graham 01.05.26
- Amended Surface Water Calculations North Plot Rev 3 Burrows Graham 15.05.26
- Amended Surface Water Calculations South Plot Rev 3 Burrows Graham 15.05.26

Following review of the above document HCC as LLFA has the following comments:

The LLFA provided comments and in our previous letters. Please refer to our previous letters for further details regarding our concerns. Some of our comments related to the quality of the outline surface water drainage design that has been presented in support of the application. However our primary concerns related to the proposed land level changes and flood risk to the development directly resulting from these changes.

Surface Water Drainage System Outline Design

The information provided in the above documents is sufficient to demonstrate that our previous comments relating to the surface water drainage system outline design have been addressed. The revised drawings and calculations now show that surface water can be managed appropriately within the site by the proposed surface water drainage system. The proposals utilise pumped drainage system which are not considered to be in accordance with principles of SuDS design and are only approved by exception. The proposals include pumped drainage networks to drain areas that are proposed to be lowered due to the constraints associated with the proximity to the airport. If ground levels could be retained as existing, it is likely that pumped systems would not be required.

Flood Risk

Based on the information available, the existing site is not subject to flood risk from any source. The proposals include proposed land level lowering in two locations: the access road and the Western side of the Southern plot. We have highlighted our concerns in detail in our previous letters. Lowering of surface levels in these locations creates areas of increased flood risk from surface water (exceedance) and groundwater. The applicant has provided

rebuttal comments in the above document which we trust the planning officer will give due consideration. The applicant has chosen not to provide preliminary details of proposed levels, as at this stage of the design, proposed finished floor levels and external surface levels are uncertain. We are only able to advise in general terms and based on our assessment of worst case. The level of increase in flood risk in the Southern Plot will depend on the design finished floor level and design level of external paving when this has been determined. As no levels plans have been provided, we appreciate it is very difficult for the planning officer to discern the proposed land level changes and resulting increase in flood risk to the proposed development. Based on the cover levels entered in the hydraulic calculations it appears that significant ground level lowering may be anticipated by the design team.

The above document contains photographs of other commercial developments. While land level changes are common, the creation of large areas of low lying ground without exceedance flow routes is not considered good practice and not in accordance with the principles of sustainable drainage design. The developments mentioned are all outside of Hampshire and the HCC LLFA require all developments to be compliant with current standards and our published guidance.

The planning officer will need to consider flood risk in the context of the overall development proposal and on planning balance.

This is an outline application with the layout and associated levels (except for the access road) to be addressed through reserved matters. Given the uncertainty in level changes it is not possible to fully understand the risk however from information provided to date, it is understood that the risk is to the new buildings as opposed to increasing off site risk. If the planning authority is minded to approve the application, robust conditions would be required to ensure land level changes are minimal and exceedance flow routes can be provided. There is a risk that this may not be achievable, as indicated by the information provided to date. Despite requesting clarification, details on level changes / design requirements have not been provided or are not available at this stage.

As such, if the decision is made to grant planning permission, we would recommend the following conditions are applied:

1. No development shall begin until a detailed surface water drainage scheme for the site, has been submitted and approved in writing by the Local Planning Authority. The submitted details should include:

- a. A technical summary highlighting any changes to the design from that previously reviewed.
- b. Groundwater monitoring undertaken between Nov – April to identify risk to building construction, emergence and potential pipe infiltration.

- c. Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations.
- d. Details of proposed land level changes and FFLs demonstrating that it has been limited to access requirements only
- e. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change.
- f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
- g. Exceedance plans demonstrating the flow paths and areas / depths of ponding in the event of blockages or storms exceeding design criteria.

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.

If you require additional guidance on providing the correct information, we recommend you use our **Surface Water Management Pre-application service** which will enable discussions with the reviewing engineer and scope out works that would address the points raised. For full details, please visit: <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning> and click on [pre-application advice request form](#).

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.

Yours faithfully,



Flood and Water Management Team
Hampshire County Council,
The Castle, Winchester, Hampshire SO23 8UD
Web:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding>

General guidance for the application

It is important to ensure that the long-term maintenance and responsibility for Sustainable Drainage Systems is agreed between the Local Planning Authority and the applicant before planning permission is granted. This should involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies.

For SuDS systems to be adopted by Hampshire Highways it is recommended that you visit the website at:

<https://www.hants.gov.uk/transport/developers/constructionstandards> for guidance on which drainage features would be suitable for adoption.

Where the proposals are connecting to an existing drainage system it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.

Works in relation to ordinary watercourses

*PLEASE NOTE: If the proposals include works to an ordinary watercourse, under the Land Drainage Act 1991, as amended by the Flood and Water Management Act 2010, prior consent from the Lead Local Flood Authority is required. **This consent is required as a separate permission to planning.***

Information on ordinary watercourse consenting can be found at the following link

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/c/hangewatercourse>

It is strongly recommended that this information is reviewed before Land Drainage consent application is made.

*For guidance on providing the correct information, we recommend you use our **Ordinary Watercourse Consents Pre-application service** and help avoid delays occurring at the formal application stage. A Pre-application service for Ordinary Watercourse Consents is available, allowing consents to go through in a smoother, often more timely manner. For full information please visit:*

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/c/hangewatercourse>