MDL Marinas - Hamble Point Marina

The Point, Hamble Marina Flood Risk Sequential Test Report

October 2025

PREPARED FOR

MDL MARINAS

savills

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Document History

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1. Introduction

1.1 This Flood Risk Sequential Test Report has been prepared on behalf of MDL Marinas (the Applicant) to support a full application for the erection of a new restaurant (Use Class E(b)) at land at Hamble Point Marina, School Lane, Hamble-le-Rice, Southampton SO31 4NB (the Site)

1.2 Hamble Point Marina is situated to the south of Eastleigh Borough and is directly south of the village of Hamble-le-Rice. The Site is located at the mouth of the River Hamble, a tributary of Southampton Water, which itself flows into and meets The Solent. To the opposite side of the River Hamble is the town of Warsash, approximately 850 m northeast.

1.3 The site itself is located at the most southerly point of Hamble Point Marina, comprising mostly hardstanding land with a strip of grassland running along the southern perimeter. A few existing trees lie on the eastern edge of the site. To the immediate north of the proposals is Outlook House. The remainder of the marina has a number of commercial, office and retail units with accompanying parking.

1.4 The scheme seeks consent for:

"Erection of new restaurant (use class E(b)) and associated works at Hamble Point Marina"

1.5 According to the Environment Agency's (EA) online map for flooding, the Site is located within Flood Zone 3 (tidal), indicating that it is in an area with the potential to be affected by tidal events. The designation reflects the site's proximity to the coast and its relationship to tidal water levels (see Figure 1)

Figure 1: Extent of Flood Zones

1.6 The National Planning Policy Framework (NPPF), revised in December 2024, sets out the relevant requirements to undertaking development in areas identified as at potential risk of flooding, and Paragraph 170 states that development should be directed away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (NPPF, Paragraph 170).

1.7 The NPPF states that the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk) (paragraph 175).

1.8 The proposed scheme will remodel the Site to ensure it is safe from flooding and will not increase flood risk elsewhere. The entire Site is located within Flood Zone 3 (tidal), as defined by the Environment Agency. In line with national planning policy, it is therefore necessary to apply the Sequential Test to demonstrate that there are no reasonably available alternative sites in areas of lower flood risk that could deliver the proposed development with equivalent outcomes and benefits.

1.9 This Report first sets out a brief description of the Site and proposals, then it will set out the methodology for the identification of alternative sites, followed by an assessment for the possible identified alternative sites.

1.10 As the Report will demonstrate, the Sequential Test is considered to be passed as no suitable, available, developable/deliverable sites have been identified within the specified search area.

2. Site and Proposals

2.1 The Site

2.1.1 Hamble Point Marina is situated to the south of Eastleigh Borough and is directly south of the village of Hamble-le-Rice. Southampton City Centre is approximately 8.2 km northwest, Eastleigh Town Centre is 13.7 km north and Portsmouth City Centre is 17.6 km south east.

2.1.2 The Site is located at the mouth of the River Hamble, a tributary of Southampton Water, which itself flows into and meets The Solent. To the opposite side of the River Hamble is the town of Warsash, approximately 850 m northeast.

2.1.3 Hamble Point Marina is a popular marine facility offering approximately 230 wet berths, 137 dry stack spaces and 24/7 boat storage. The site accommodates 50 onsite commercial tenants alongside maintenance facilities, parking and 24/7 storage.

2.1.4 The site itself is located at the most southerly point of Hamble Point Marina, comprising mostly hardstanding land with a strip of grassland running along the southern perimeter. A few existing trees lie on the eastern edge of the site.

2.1.5 To the immediate north of the proposals is Outlook House. The remainder of the marina has a number of commercial, office and retail units with accompanying parking.

2.1.6 An existing food and beverage facility the '*Ketch Rigger*' is located in the marina pitched as 'casual all day dining' with a more comparable restaurant to the proposed development '*Banana Wharf*' approximately 1.4km up the River.

2.2 The Proposal

2.2.1 A full application has been submitted with the following description of development:

"Erection of new restaurant (use class E(b)) and associated works at Hamble Point Marina"

2.2.2 The proposed development is a restaurant intended to support and diversify the marinas offering to futureproof its position within the Hamble. By providing a permanent, high-quality hospitality offer within the marina, the development will increase dwell-time and visitor spend from berth holders, visiting crews and the wider community, aiding in the generation of year-round footfall that benefits on-site marine businesses (chandlers, maintenance providers and retail tenants), while also creating new local employment and economic opportunities in both front and back-of-house roles.

2.2.3 The restaurant would also diversify revenue for the MDL Marinas, supporting reinvestment back into marina maintenance and infrastructure to future proof the marine industry within the Hamble.

2.2.4 The nature of the use requires a consolidated operational footprint to create an integrated hospitality facility, including dining space, back-of-house facilities, storage, service yards, and safe circulation areas. This demands underlines that the disaggregation and distribution of the restaurant across multiple smaller marina sites is unfeasible.

2.2.5 Furthermore, the disaggregation of the development over multiple marinas would not deliver the functional or economic objectives of the proposal - to support and diversify Hamble Marina, and so future-proof the marine industry within the Hamble.

2.2.6 A restaurant physically detached from the marina it is intended to support would undermine the objectives of diversifying and future proofing the marina – it would limit the restaurants ability to attract customers and deliver marina footfall, and would not result in providing integrated and supported services to Hamble Marina.

3. Methodology for the Identification of Alternative Sites

3.1 Policy Background

3.1.1 The National Planning Policy Framework (NPPF), revised in 2024, sets out the relevant requirements with regard to undertaking development in areas identified at potential risk of flooding, such as the Site.

3.1.2 Paragraph 181 states that:

"When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan."

3.1.3 As set out in the NPPF (paragraph 170)

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere."

3.1.4 As such, the Applicant needs to demonstrate that the proposals for the Site could not be delivered elsewhere in an area at lower risk of flooding whilst having the same result and benefits.

3.1.5 The procedure for the completion of undertaking the Sequential for sites is set out within the Planning Practice Guidance (PPG) which sits alongside the NPPF.

3.2 Search Parameters for Alternative Sites

3.2.1 There are four key factors that Savills considers should be taken into account when assessing alternative sites through the Sequential Test process:

- Location/Geographical area over which the test is to be applied;
- Type of Development;
- Capacity;
- Flood Risk; and
- Availability.

3.2.2 The understanding of these factors is set out below.

Location/Geographical Area

3.2.3 The PPG states that, "*For individual planning applications subject to the sequential test, the area to which the test needs to be applied will be governed by local circumstances relating to the catchment area for the type of development proposed and the needs it is proposing to address.* ***The catchment area should always be appropriate to the nature and scale of the proposal and the settlement it is proposed for***. " (027a Reference ID: 7-027-20220825 emphasis added).

3.2.4 Paragraph 027a of the PPG states that a pragmatic approach should be taken when undertaking the Sequential Test, and that "*For* ***infrastructure proposals of regional or national importance*** *the area of search may reasonably extend beyond the* ***local planning authority boundary*** (027 Reference ID: 7-027-20220825 emphasis added), but in most cases it would not usually be appropriate for the area of search to extend the specific area of a town or city in which the proposal is located, and certainly not beyond the district boundary

3.2.5 As recognised within the Eastleigh Borough Local Plan 2016-2036, the boatyards and marinas on the River Hamble make an important contribution to the economy of the Borough and the sub-region, and are important for tourism and recreation. The Local Plan states that it is important that they are retained in this use, and that they are able to evolve and change, including allowing small parts of a boatyard for non-boat-related uses in order to secure the viability of the remainder of the boatyard or marina.

3.2.6 The proposed development is looking to provide a restaurant supporting the diversification of Hamble Marina services, which in turn looks to future-proof the marine industry within the River Hamble and Eastleigh Borough Council.

3.2.7 In accordance with Paragraph 027a of the PPG, the Sequential Test parameters should reflect local circumstances and the catchment area relevant to the type of development proposed. The proposed restaurant is intended to support the diversification of Hamble Marina services and, in doing so, directly contributes to the economic vitality of Eastleigh Borough. It is not a nationally or regionally significant infrastructure project, proposing to serve a local function and supports the ongoing viability of the borough's marine industry.

3.2.8 Given the localised nature of the development and its role in sustaining a key component of the borough's economy, it is considered appropriate and consistent with the PPG guidance for the Sequential Test to be limited to sites within Eastleigh Borough Council boundaries.

3.2.9 Expanding the search beyond the borough would be disproportionate and unnecessary, as the primary benefits of the development (supporting tourism, recreation, and the marine sector) are concentrated within Eastleigh.

Type of Development

3.2.10 In establishing the parameters for the Sequential Test, it is essential to consider the nature and intended use of the proposed development.

3.2.11 Marina-related tourism and hospitality schemes have distinct locational and operational requirements that differ from those of residential or community uses.

3.2.12 The Yacht Harbour Association's definition of a marina as "*a facility for the berthing of pleasure craft providing direct walkway access to each boat, and adequate depth of water at all times, car parking, toilet facilities, services and other amenities*". Locations lacking direct walkway access, adequate year-round water depth or essential amenities such as parking and sanitary facilities have been excluded, as they would not operate as fully functional marinas within the recognised industry definition.

3.2.13 Furthermore, Eastleigh Borough Local Plan 2016-2036 identifies boatyard and marina sites on the River Hamble within Policy DM20 and its policy map.

3.2.14 By applying these defining characteristics and policy allocations, the Sequential Test considers only genuine, operationally viable marina facilities rather than informal moorings, boatyards, urban marinas or other water-based infrastructure that do not recognise the established criteria.

Capacity

3.2.15 The required test of the NPPF is whether an alternative site is "*appropriate for the proposed development*" (Paragraph 174). Paragraph 027a of the PPG states that 'The sequential test should be applied proportionately, focusing on realistic alternatives in areas of lower flood risk that could meet the same development need' (emphasis added).

3.2.16 For the purposes of this assessment, a comparable site that could be suitable for development is regarded as a site capable of accommodating a similar level, density and type of development and is therefore of a comparable size.

3.2.17 However, there will need to be consideration of disaggregation where a 'series' of smaller sites could, in-combination, deliver the proposed scheme. The R (Mead and Redrow) c SoS LUHC [2024] 279 (Admin) High Court judgement is clear that there should be relationship between those smaller sites.

3.2.18 As already addressed within this report, it is not viewed that disaggregation of a single restaurant site could act as a genuine alternative due to the need for the proposed development to be a consolidated operational footprint to deliver the functional or economic objectives of supporting and diversify Hamble Marina

3.2.19 The Applicant's proposal is for up to 270m^2 of restaurant.

3.2.20 In order to deliver a viable scheme for a 270m^2 with appropriate infrastructure and act as a genuine comparable site, the minimum site capacity should be no less than 200m^2.

Flood Risk

3.2.21 For the purposes of the proposed assessment, it is recommended that if the flood zone in which the other site lies is the same or greater risk of flooding than the Site (i.e. Zone 3), based on the EA Flood Map, it should not be considered a reasonable alternative site because it is not within an area at lower probability of flooding.

3.2.22 The PPG states that the sequential approach to locating development at lower flood risk should be applied to all sources of flooding, including development in an area which has critical drainage problems, and where the proposed location of the development would increase flood risk elsewhere.

3.2.23 Any site which is considered likely to increase flood risk elsewhere as a result of development, or which is considered to be at a greater risk of flooding than the Applicant's site will not be assessed within the proposed Sequential Test in accordance with the PPG requirements.

4. Initial Assessment of Sites

4.1 Location

4.1.1 As stated within the previous section of this report, only sites within Eastleigh Borough Council's administrative boundaries should be considered within the Sequential Test. This geographical boundary formed the basis of the report as shown in Figure 2.

Figure 2: Geographical Search Area

4.1.2 The Geographical Information System known as QGIS was used to identify potential sites within the geographical boundary. All marinas as characterised by Yacht Harbour Association's definition and allocated within Policy DM20 were then identified within the boundary.

4.1.3 This resulted in 7 marinas being identified (see Appendix A and Figure 3)

Figure 3: Marina Sites

4.2

4.3 Flood Risk

4.3.1 Of the 7 sites identified, 6 of the marinas were found to be completely over washed by Flood Zone 2 and 3. Therefore, as those sites were not sequentially preferable to the Site, they were discounted from the search.

4.3.2 This was undertaken by cross referencing the sites against the EA Flooding Risk Maps. This is illustrated within Figure 4.

Figure 4: Marina Sites and the Associated Flood Risk

4.4 This resulted in 1 remaining marina site – Mercury Yacht Harbour

4.5 Operational Marina Function and Land Availability

4.6 In order to consider the remaining site could be considered as reasonably available alternatives to the proposed development in accordance with the requirements and definitions of the Planning Practice Guidance (PPG), it is important to look at the potential of the site to deliver the proposed development and its availability.

4.7 The NPPG Paragraph 028 states that to be "*reasonably available*" a site:

a) must be in a suitable location for the type of development proposed;

b) must be able to meet the same development needs; and

c)

d) must have a reasonable prospect of being available to be developed at the point in time envisaged for the development.

4.8 Paragraph 028 of the PGG states that 'In considering whether alternative lower-risk sites would be capable of accommodating the proposed development, such alternative sites do not need to be owned by the applicant to be considered "*reasonably available*"'.

4.9 The NPPF (paragraph 174) makes clear that when considering reasonably available sites, you are considering whether the site is appropriate for 'the' proposed development and not for any development. Accordingly, when the NPPG states that a site must have a "*reasonable prospect of being available to be developed*", it must mean that the site must also have a "*reasonable prospect of being available to be developed*" into the proposed development itself.

4.9.1 A manual review of the land use within the remaining marina (Mercury Yacht Harbour) was undertaken using satellite imagery (see Figure 5).

Figure 5: Satellite Imagery of Mercury Yacht Harbour

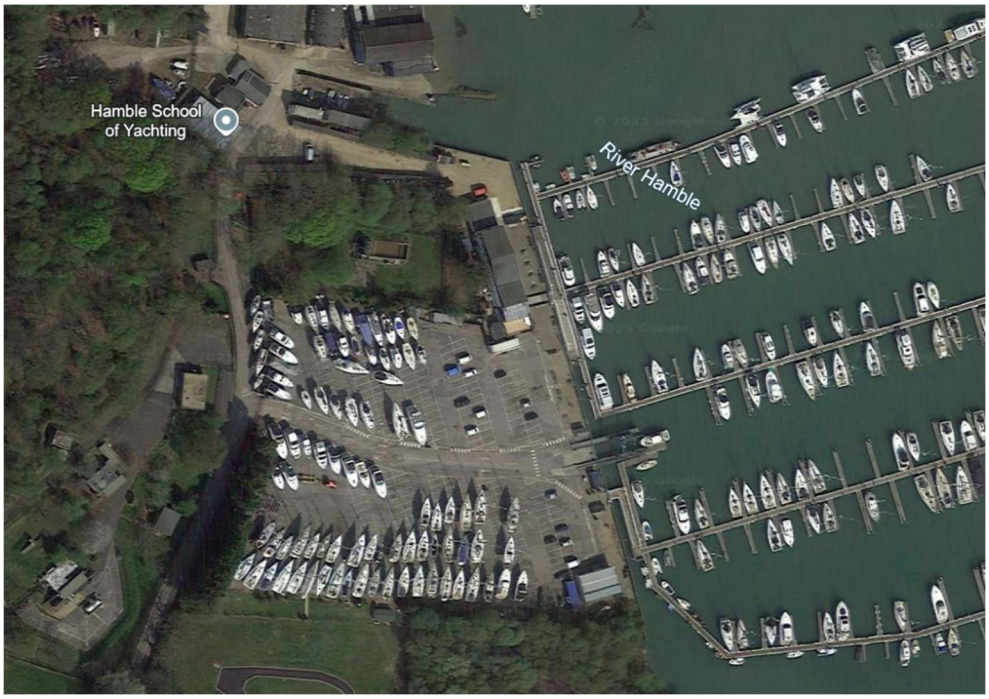
4.9.2 The available dry land within marinas is often operationally essential for boat handling, repair, and storage. The loss of such land would act to compromise the marina's viability and conflict with its established use.

4.9.3 The restaurant should complement the operational needs of the marina, rather than over take them. Removing operational land essential to the marina's functioning would undermine the objective of introducing a supporting restaurant, and therefore not available for redevelopment without compromising the core marina function.

4.9.4 Historic imagery of Mercury Yacht Harbour shows that that the large expanse of hardstanding situated within the site is regularly used to storage boats and other ancillary equipment and machinery.

4.9.5 Furthermore, Mercury Yacht Harbour is within MDLs ownership, and as part of the site location for the proposed development, a full review of the marinas was undertaken for surplus land that could accommodate the proposed restaurant. MDLs assessment of Mercury Marina found that there was no surplus land available that could be released from marina use without adversely affecting its operation (see Figure 6).

Figure 6: Mercury Yacht Harbour Land Usage (2020)



4.9.6 Hence, it can be concluded that there is no surplus land within Flood Zone 1 available to accommodate a restaurant of comparable size to the proposed development without materially affecting the marina's operational capacity.

4.9.7 As such, while the site is a marina within the defined search area, it is not an available or realistic alternative for the proposed use, and is therefore not sequentially preferable.

5. Summary

5.1 This Sequential Test has been undertaken in accordance with the requirements of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), with the aim of demonstrating that there are no reasonably available sites in areas of lower flood risk that could accommodate the proposed development.

5.2 The proposed restaurant is intended to support and diversify the offering at Hamble Point Marina, enhancing its long-term viability and contributing to the economic vitality of Eastleigh Borough. The nature of the development requires a consolidated operational footprint within the marina itself, making disaggregation across multiple sites unfeasible.

5.3 A comprehensive assessment of alternative marina sites within Eastleigh Borough was undertaken, in line with the defined search parameters. Of the seven identified marina sites, six were discounted due to their location within Flood Zones 2 or 3, which are not sequentially preferable.

5.4 The remaining site, Mercury Yacht Harbour, was assessed in detail and found to lack surplus land that could be released for development without compromising its operational function. As such, it does not represent a reasonably available alternative.

5.5 Based on this assessment, it is concluded that there are no suitable, available, and developable sites within areas of lower flood risk that could deliver the proposed development with equivalent outcomes and benefits.

5.6 The Sequential Test is therefore considered to be passed.

Appendix A : Marina Sites

Name	Location	Address & Postcode	X Easting	Y Northing
Deacons Marina and Boatyard	Bursledon	Bridge Rd, Bursledon, Southampton SO31 8AZ	449144	109722
Elephant Boatyard	Bursledon	Lands End Road, Bursledon, Southampton SO31 8DN	448984	109464
Mercury Yacht Harbour	Hamble	Satchell Ln, Hamble-le-Rice, Southampton SO31 4HQ	448426	108151
Port Hamble Marina	Hamble	Satchell Ln, Hamble-le-Rice, Southampton SO31 4QD	448436	107098
Royal Southern Yacht Club	Hamble	Rope Walk, Hamble-le-Rice, Southampton SO31 4HB	448452	106800
Swanwick Marina	Swanwick	Swanwick Marina, Swanwick Shore Rd, Swanwick, Southampton SO31 1ZL	449144	109722
The Chandlery Barge	Hamble	Riverside Boatyard, Blundell Ln, Bursledon, Southampton SO31 1AA	449384	110045

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