1ST HORIZON

FLOOD RISK & DRAINAGE - PROOF OF EVIDENCE

(REF: 8607-R09-PoE)

Client: **Home Office**

Project: **Haslar IRC, Gosport**

Date: **20/10/2026**

Contact Details

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Flood Risk and Drainage Proof of Evidence	
Project	Haslar IRC, Gosport
For	Home Office
Reference	8607-R09
Date	20 October 2026
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1.0 PREFACE

1.1 My name is [redacted], Associate Director, Enzygo Ltd.

1.2 I hold a First Class Bachelor of Science degree with honours in Physical Geography, from Aberystwyth University, specialising in Hydrology, and a Master of Science Degree with Merit in Catchment Dynamics and Management from the University of Leeds. I am a Chartered Water and Environmental Manager (C.WEM) with the Chartered Institution of Water and Environmental Management (CIWEM).

1.3 I have written and managed many Flood Risk Assessments across a 13-year career, in all regions of the United Kingdom, spanning multiple sectors including Leisure, Strategic Land for residential use, Energy, Schools and Commercial Developments. These have involved complex hydrological interactions of Pluvial and Fluvial Flood Risk, Groundwater flooding, and flooding from canals and other infrastructure. Much of this work has been tested at planning appeal, ranging from written representations to inquiry. Most of this work has resulted in approval of documents in planning to gain consent.

1.4 I have expertise in writing Flood Evacuation and Management Plans and have designed a training programme for holiday park General Managers in the leisure industry.

1.5 I have undertaken some bespoke work advising local authorities on geographic information systems to assess flood risk for social housing portfolios. I am also an expert in property flood resilience (as a CIWEM and Environment Agency trained PFR surveyor at foundation level) and have also problem solved prolific surface water flooding issues for existing residential areas on behalf of a local authority.

1.6 I have previously prepared expert evidence for public hearings, inquiries and civil court matters. I have given evidence in hearing and inquiry formats.

1.7 I have produced this report as a specialist sub-consultant on behalf of 1st Horizon Surveying & Engineering Limited and the Home Office.

2.0 BACKGROUND

2.1 The proposed development in discussion at this Inquiry is for an Immigration Removal Centre (IRC) development, at Haslar, Dolphin Way, Gosport, PO12 2AW, considered under a Crown application made by Home Office to the Secretary of State under reference CROWN/2026/0000005. Flood risk and drainage information was most recently prepared by 1st Horizon Ltd at the time of the application [Flood Risk Assessment 8607-R09 Rev F dated 25th September 2026 **[provided in CD 3.22].**

2.2 This development site will manage known surface water flood risk to provide a safe proposed development area. The proposed development requires measures to ensure policy compliance. There are no outstanding objections from any statutory bodies as outlined below.

2.3 Hampshire County Council (the Lead Local Flood Authority or LLFA) were consulted in a pre-application with a meeting held on 18th December 2025 and response letter following that meeting issued immediately after **[CD 11.1].** The LLFA were supportive of the draft drainage strategy details provided in advance of this meeting.

2.4 Following the submission of the Crown application, the LLFA provided a consultation response stating they had no objection to the proposals with recommended conditions, issued 25th September 2026 **[CD 11.2].**

2.5 The Environment Agency objected to the proposed flood measures detailed in the FRA in a letter dated 3rd August 2026 **[CD 11.3].** The holding objection was made based on the proposed floor levels of the planned accommodation buildings at the Site. The Environment Agency required clarity that an appropriate freeboard (+600mm) above the extreme tidal flood level (1 in 200-year plus climate change event in the 2125 epoch) had been included in the design finished floor level (FFL) for the ground floor of the buildings.

2.6 In response to this, a design amendment, shown in a Parameters Plan (323319-15207-ATR-000-GF-DR-A-0200-S2-D0100, September 2026) **[CD2.4]** demonstrates an appropriate freeboard allowance above the extreme tidal flood has been allowed for. For clarity, the design flood level is 4.64 metres above Ordnance Datum (mAOD). With a +600m freeboard allowance, this equates to a FFL of 5.24mAOD. This was presented in an amended FRA (ref 8607-R09 Rev F at **CD 3.22].**

2.7 Following a meeting held with the Environment Agency on 29th September 2026, and submission of the rev F FRA, the holding objection was removed and conditions recommended, as per the Environment Agency letter dated 6th October 2026 **[CD 11.4].**

2.8 Southern Water was consulted on a pre-development enquiry regarding surface and foul water capacity on 2nd July 2026 **[CD 11.5]**. Southern Water confirmed there was adequate capacity for the proposed foul flows (4.14 l/s average flow). Southern Water stated the surface water sewer located in the wider Site where a connection is proposed, lacks capacity for the proposed flow rate of 8.4 l/s. While Southern Water confirm an current lack of capacity in the surface water sewer, they state on page 2 of their letter response: "Southern Water has a duty to provide Network capacity from the point of practical connection (point of equivalent or larger diameter pipe) funded by the New Infrastructure Charge." Therefore, following a connection request, likely via a S106 connection application following consent, Southern Water have a statutory responsibility to provide a connection point with adequate capacity.

2.9 The application is now due to be considered by the Planning Inspectorate at an Inquiry due to be held on week commencing 16th November 2026.

2.10 The purpose of this proof of evidence is to outline the evidence accepted by statutory consultees and respond to interested third-party comments, to assist with an explanation as to why the proposed development complies with all national and local policies on flood risk and drainage, demonstrating that the strategy is appropriate and the development should be allowed subject to appropriate conditions on flood risk measures and surface water drainage.

3.0 FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY

Site Description

3.1 The 4.55-hectare (ha) development is comprised of undeveloped open space adjacent an existing building complex that served as barracks and latterly an IRC before closure. With renovation of the existing buildings outside of the application boundary, the proposal will serve as an extension to this existing IRC with accommodation buildings and associated hardstanding. An expansion of the existing carpark area in the west of the Site is also included in the proposals.

3.2 The current land drainage in the application boundary relies on overland flow (exceedance) to the north-west towards Fort Road.

Flood Risk

Assessment

3.3 The risk of flooding is assessed in the latest Flood Risk Assessment **[CD 3.22]** as follows:

- The site is in Flood Zones 1, 2 and 3; thus, the risk of tidal flooding is assessed as medium to high for the Site. Flood modelling undertaken to support the application **[CD 3.10]** has made a site-specific refinement of the tidal flood zones on site and the design flood level while assessing no impact on flood risk offsite.
- The Site has largely a negligible risk of surface water flooding, with a very limited area in the east of the Site at low to high risk. This is associated with one small area of ponding. Measures dealing with surface water flooding are addressed in the following measures section.
- The Site has a low risk of groundwater flooding.
- The risk of flooding from all other sources is assessed as negligible.

3.4 The proposed residential use of the proposed accommodation buildings at the IRC is classified as more vulnerable. More vulnerable uses are acceptable in terms of flood risk in Flood Zone 3 (high risk), subject to compliance with the Sequential Test (where relevant) and compliance with the Exception Test and appropriate measures.

Measures

3.5 The following measures (**CD 3.22, FRA, Section 6.2**) will ensure the proposed development will be safe for its lifetime:

- The Finished Floor Level for any proposed sleeping accommodation should be above 4.64mAOD + 600mm freeboard (i.e. 5.24m AOD). This can be achieved by land raising for ground floor sleeping accommodation or without land-raising utilising ground

floor rooms for uses other than sleeping accommodation. The finished floor levels are shown in Appendix A.

- Build in a flood resilient way (e.g. tiled floors, auto airbricks, use non-return valves on pipework).
- The management staff onsite should be registered with the Environment Agency Floodline Warnings Direct service.
- Produce a Flood Evacuation Management Plan covering the development and wider site **[CD 3.23].**
- No below surface habitable buildings (i.e. basements).
- Adoption of a surface water management strategy.
- Set finished floor levels above external levels.

Surface Water Drainage Strategy

3.6 In accordance with requirement H3 of the Building Regulations 2010, and most recently the National SuDS Standards (July 2025), rainwater runoff must discharge to one of the following, listed in order of priority:

1. Collection for non-potable use: Due to the nature of the development, it is not reasonably practicable to install water butts or tanks for non-potable use.
2. Infiltration to ground: The use of infiltration-based SuDS has not been utilised for this Site due to the clayey bedrock mapped at the Site. The LLFA pre-application response confirms this approach **[CD 3.22, Appendix G]**
3. Discharged to an above ground surface water body: There are no watercourses inside the Site boundary, or within 100m.
4. Discharged to a surface water sewer, or another piped surface water drainage system: There is a public surface water sewer located beneath the northern area of Haslar. There are also private surface water sewers located within the Site's boundary. Capacity will be provided in this asset where it is lacking following consent, as is the statutory responsibility of Southern Water.
5. Discharge to a combined sewer: There are no combined sewers located within the vicinity of the Site.

3.7 The submitted outline drainage strategy **[CD 3.22, Drawing Hydrology-001**] demonstrates surface water will, via a multi-stage treatment process, be attenuated in cellular storage, and ultimately discharge to the public sewer located in the wider site to the east. The development proposals will provide a betterment by reducing the uncontrolled surface water discharge from the site explained below.

3.8 Runoff from the site will be discharged at QBAR (8.4 l/s), for all storms up to the 1 in 100-year event plus an allowance of 40% for climate change (CC) **[FRA CD 3.22, Section 7.2].**

3.9 In summary the surface water drainage strategy is as follows:

- The proposed development will increase the area of impermeable surfaces and therefore increase the potential for an increased amount of runoff if a drainage strategy is not proposed.
- Surface water runoff from the development will be discharged to a public surface water sewer located in the wider site to the east of the application boundary. In short, this means that runoff from the site will be reduced from the current predevelopment position, which otherwise can flow to the north in an uncontrolled manner.
- A SuDS drainage scheme is proposed to manage excess runoff from the development, comprising a multi-stage treatment process, which include filter drains, lined permeable paving and swales, with their associated water quality benefits (sufficient removal by SuDS features of total suspended solids, heavy metals and hydrocarbons associated with the proposed site uses and surfaces). Above ground detention basins or similar are not appropriate for the secure nature of the Site.
- A restricted outfall to onsite watercourses from the above proposed SuDS system will mean discharge above the QBAR rate up to the 1 in 100-year plus climate change rainfall event will be capped at QBAR. This provides betterment for the receiving public surface water sewer.
- A SuDS treatment train will improve water quality and safeguard any downstream designations with hydraulic connectivity to the development. A maintenance and management plan will ensure the effectiveness of the drainage strategy during the operational phase. This approach is not novel but represents a tried and tested approach to flood risk management and drainage matters.
- Implementation of a Construction Environmental Management Plan (CEMP) during the construction phase will manage surface water and foul drainage, thereby mitigating the potential for impacts on hydrology, flood risk, and water quality.

Summary and Conclusion

3.10 The proposed residential use is classified as more vulnerable. More vulnerable uses are acceptable in terms of flood risk in Flood Zone 3 (high risk), subject to the passing of the Exception Test and proposed measures. Surface water flood risk is managed and provides betterment. Site drainage will be controlled through a robust SuDS strategy comprised of multi-stage treatment and attenuation in cellular storage, as demonstrated by the Flood Risk Assessment and associated drawings and calculations **[CD 3.22].**

4.0 DRAINAGE BETTERMENT

Location

4.1 The proposed development currently falls broadly to the northeast, and due to the superficial ground conditions (i.e. freely draining soils on groundwater saturated sand and gravel and sand, silt and clay bedrock) **[CD 3.22, Section 4.4],** runoff is predominantly uncontrolled overland flow, with limited infiltration, particularly during extended periods of rainfall and high tide.

4.2 The proposed drainage strategy **[CD 3.22, Drawing Hyrology-001],** proposes discharging water from the site to an existing Southern Water sewer located within the wider Site adjacent the eastern boundary, in line with the Drainage Hierarchy. This will result in a betterment to downslope land, highways and infrastructure, as the existing site's uncontrolled runoff is then managed, reducing flood risk to the surrounding area.

4.3 Therefore, all rainfall events from the annual flood up to the 100-year plus an allowance for climate change would be controlled, providing a demonstrable betterment from the current uncontrolled situation.

4.4 As per the Flood Risk Assessment **[CD 3.22, Table 7.1],** the proposed discharge rate for the Site developable area is QBAR for respective drainage catchments. Therefore, discharging from the site at QBAR will create betterment across all return periods at or above this flow rate, up to the 1 in 100+40%CC event (Table 4.1 below).

Table 4.1 - Proposed Site Runoff

Annual Probability (Return Period, Years)	Greenfield Runoff (l/s)	Proposed Runoff (l/s)	Difference (l/s)	% Difference
QBAR	8.40	8.40	0.00	0.00
3.33% (30)	19.40	8.40	-11.00	-56.70
1% (100)	26.90	8.40	-18.5	-68.77
1% Plus Climate Change	37.66	8.40	-29.26	-77.70

Summary

4.5 The FRA **[CD 3.22]** demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national and local policy and guidance.

4.6 The drainage design measures as part of the development will provide the opportunity to introduce betterment to flood risk outside of the development **[CD 3.22].**

5.0 LOCAL AND NATIONAL POLICY COMPLIANCE

Local Policies

5.1 The FRA considers the following policies within the adopted Gosport Borough Local Plan 2011-2029:

- **Policy LP39:** Water Resources.
- **Policy LP45:** Flood Risk and Coastal Erosion.
- **Policy LP47:** Contaminated Land and Unstable Land.

5.2 Policy LP39 States:

1. Development proposals which would have an adverse effect on the quality of surface, ground or coastal water will not be permitted in accordance with the Water Framework Directive. New development should take opportunities to enhance these resources.

5.3 The drainage strategy provided in the FRA **[CD 3.22]** includes multiple treatment stages for surface water where possible while addressing the secure requirement of such features to ensure water quality standards will be met.

2. Development proposals will be permitted provided that the necessary water resources are already available. New residential development proposals should include measures that will reduce the consumption of water equivalent to 110 litres per person per day (including external water use).

5.4 The matter of water resourcing for the development is not my expertise.

3. Development proposals will be permitted provided that they facilitate the efficient use of new and existing sewerage infrastructure. In cases where these are deficient, development proposals and their occupation should be phased to coincide with provision of necessary wastewater infrastructure so as to safeguard the environmental qualities of the area. It will be necessary to:

a) ensure that existing underground sewers are not built over and future access to the existing sewerage infrastructure must be secured for operational, maintenance and upsizing purposes;

b) ensure that surface water is separated from existing foul or combined sewers; and

c) where required, construct on-site and off-site sewers to adoptable standards to ensure they function effectively and that adequate capacity is provided to serve the development.

5.5 As stated elsewhere in my proof of evidence at Section 2.8, I have highlighted Southern Water have indicated a potential lack of capacity in the surface water sewer where drainage is proposed to connect. A phased agreement enforceable by condition can ensure any connection from the development aligns with the provision of capacity by Southern Water for this sewer asset. Southern Water have a statutory responsibility under the Water Industry Act 1991 to receive flows from consented development. The sewer section is shortly before its coastal outfall, meaning only the section where the connection is being made before the outfall may require upsizing to accept the capped flow from the development.

4. Development proposals which incorporate, where practical, the use of sustainable drainage systems will be permitted provided that:
5. sewerage, sewage disposal facilities and surface water drainage of adequate capacity and design are available;

5.6 A SuDS strategy is provided in a drawing appended to the FRA **[CD 3.22],** and the matter of capacity is considered in response to the above point.

6. the required capacity will be provided prior to the occupation of the development; and

5.7 A phased approach for sewer connections can be secured by condition.

7. appropriate long term management arrangements are made for their maintenance.

5.8 A maintenance and management plan can be provided, expanding on the remarks on this aspect of design provided in the FRA **[CD 3.22, Section 7.2, Figures 7.1, 7.2 and 7.3].**

Policy LP45 states:

1. The Borough Council will expect development proposals in areas at risk of flooding to demonstrate that they are necessary and can be made safe without increasing the risk of flooding elsewhere in the Borough in accordance with policies in the NPPF. For development proposals on sites not allocated in the Local Plan, it must be clearly demonstrated that the sequential approach for site selection has been followed, and the Sequential Test has been met. Where it is necessary to apply the Exception Test, all the associated criteria in the NPPF (or national policy equivalent) must be met to the satisfaction of the Council.

5.9 The FRA **[CD 3.22]** is supported by a site-specific hydraulic modelling assessment **[CD 3.22]** to define the site-specific tidal risk to the Site. With this level of assessment, a design flood level has been defined. Including a suitable freeboard above this level, a finished floor level has been defined for the scheme. The primary mitigation above the floor levels measures is to evacuate the site with reference the Flood Evacuation Management Plan **[CD 3.23].**

2. Within areas of coastal change, proposals will only be permitted if in accordance with the latest Government guidance.

5.10 The Site is fronted by coastal defences on its eastern aspect. The North Solent Shoreline Management Plan and National Coastal Erosion Risk Mapping (NCERM) defines the management policy for this unit, known as 5B01 (Portsmouth Harbour Entrance to Gilkicker Point – Extract in Appendix 1 to this proof)[1], to be 'Hold the line' from present to 2105. No coastal change is therefore anticipated for the lifetime of the development (minimum 75 years in flood risk terms).

3. A site specific Flood Risk Assessment (FRA) will be required for development proposals on those sites which are 1 hectare or more in Flood Zone 1 and for all development on land within Flood Zones 2 and 3. The FRA must also clearly demonstrate that any residual risks can be safely managed. The development proposal must demonstrate safe access and egress to and from the site. In exceptional circumstances should this not be possible to achieve then clear and detailed justification as to why this is the case will be required. In such cases, the developer will be required to provide an appropriate standard of safe refuge(s) and associated facilities within the development. In these circumstances a robust flood warning and evacuation plan would need to be submitted with the development proposal.

5.11 A site-specific FRA is provided [**CD 3.22]**, informed by a site-specific hydraulic modelling exercise **[CD 3.10],** with recommended measures appropriate to the site and in line with Environment Agency commentary, supplemented by a Flood Evacuation Management Plan **[CD 3.23]** to manage residual risks.

4. All new development must ensure there will be no net increase in surface water run-off.

5.12 A SuDS strategy **[CD 3.22, Drawing Hydrology-001]** which caps runoff rates at QBAR from the development has been proposed with a connection to the surface water sewer located within the wider site. This ensures no net increase in surface flows from the site.

5. Where appropriate, new development should incorporate Sustainable Drainage Systems (SuDS) in accordance with policy LP39. Where SuDS are included in the scheme, arrangements must be put in place for their ownership and whole life maintenance and management.

5.13 A SuDS strategy is provided in the FRA **[CD 3.22, Drawing Hydrology-001]** and outlined at Section 7 of that document.

[1] https://environment.data.gov.uk/shoreline-planning/unit/SMP13/5B01

6. Buildings and sewerage infrastructure should be designed to incorporate flood resilience and flood resistance measures.

5.14 A proposed finish floor level with adequate freeboard allowance above the design flood level is stated in proposed measures of the FRA **[CD 3.22, Section 6.2].**

7. Developer contributions may be required for the redesign and/or replacement of existing flood defences and the provision of new flood risk management measures as appropriate. Where required, land will be safeguarded from development in order to provide for current or future flood risk management.

5.15 This is noted. No such requirements have been identified in this case.

8. Planning permission will be granted for flood risk management measures provided the scheme does not individually or cumulatively have a detrimental impact on internationally important habitats and that any necessary avoidance and mitigation measures have been secured.

5.16 None are proposed for the site in addition to defence measures already in place.

Policy LP47 states:

5.17 The following extract of LP47 relates to groundwater:

> Development proposals will not be permitted unless practicable and effective measures are proposed to treat, contain or control any contaminants so as not to: a) expose the future occupiers of the development and neighbouring land uses, including in the case of housing the users of gardens, to unacceptable risk;
> b) cause the contamination of adjoining land or allow such contamination to continue; and
> c) cause pollution of the water environment including groundwater, Portsmouth Harbour and the Solent. 3. Where development proposals are submitted on land which is either unstable or has the potential to become unstable, the Borough Council must be satisfied that any such instability can be reasonably overcome. In circumstances where unstable land may be present, the developer will be required to submit a stability report at the planning application stage

5.18 The SuDS strategy proposes discharge to sewer rather than infiltration, the latter which could mobilise any unknown contaminants in made ground which may underly the site. Therefore, the groundwater contamination risk is reduced by the proposed drainage strategy.

National Policies

5.19 The proposed development conforms to Planning Practice Guidance (PPG), the National Planning Policy Framework (NPPF Chapter 18), and the National Standards for Sustainable Drainage Systems, of which there are six applicable to outline development proposals. The LLFA have no objection on flood risk and drainage matters **[CD 11.2].** The Environment Agency have now withdrawn their objection related to freeboard allowance of proposed ground floor levels for the proposed buildings **[CD 11.4].**

6.0 CONCERNS RAISED BY INTERESTED THIRD PARTIES

Introduction

6.1 I have, below, drawn out common themes raised by interested third parties in relation to flood risk and drainage matters concerning the proposed development and provide responses to those comments in turn.

Flood Risk Matters

1. Site Location in a flood-prone coastal area

Local interested third parties state that Haslar is a low-lying coastal site next to the Solent and argue that parts of the site are vulnerable to tidal flooding. They question whether a major detention facility is an appropriate use in this location.

6.2 This is of course considered in the FRA, supported by hydraulic modelling **[CD 3.22 and CD 3.10** respectively**]** and a FEMP **[CD 3.23].** The measures proposed to keep the site and occupants safe from flooding for its lifetime are accepted by the LLFA and Environment Agency.

2. Climate change and sea-level rise

Several respondents argue that future flood risks will worsen through:

- *rising sea levels;*
- *more severe storms;*
- *increased rainfall;*
- *climate change effects over the lifetime of the development.*

6.3 The FRA considers climate change with proposed floor levels being 600mm above the 1 in 200-year plus climate change tidal event in the 2125 epoch. The proposed SuDS strategy includes a 40% climate change allowance for increased rainfall and caps flows at QBAR across return periods up to the 1 in 100-year +40% event, resulting in betterment with the proposals consented and built.

3. Emergency evacuation

The most common planning concern relates to evacuation:

- *difficulties evacuating up to 600 detainees;*
- *reliance on limited road access;*

- *ability of emergency services to reach the site during flooding;*
- *public safety implications.*

6.4 The FEMP **[CD 3.23]** has been considered acceptable by the Environment Agency and manages the above issues by timing an evacuation to occur before the site floods. Should flooding occur without warning, the onsite accommodation buildings and the wider site to the north-east are located at elevations above the extreme tidal event in order to provide refuge.

4. Prematurity of flood planning

Local interest parties argue that flood and emergency arrangements have not yet been tested because the 130-bed facility has not reopened. They consider the expansion premature.

6.5 The FEMP document presented has been developed over many years, which is in use in a variety of circumstances including for a major holiday park operator that have sites with 500+ units to evacuate prior to tidal flooding. As a governmental organisation will operate the IRC Site, they would collaborate with a multi-agency response as stipulated in the Civil Contingencies Act 2004. Staff training on evacuation procedures will be in place for the IRC.

Drainage Matters

1. Existing network constraints

Commenters suggest local drainage and foul water infrastructure is already under pressure and may not accommodate a significant increase in occupancy.

6.6 Southern Water have a statutory responsibility to accept foul flows from the Site. There is sufficient capacity as I have outlined in Section 2.8 of this proof. While capacity in the surface water sewer is currently lacking for the proposed site connection, Southern Water have a statutory responsibility to accept the flows following consent of the scheme. This will be partly paid for by payment of infrastructure charges by the developer at the time of connection to the sewer. The upgrade should be reasonably straight forward, affecting only the network just upstream of the outfall to sea.

2. Sewage treatment and Solent impacts

Comments generally refer to:

- Southern Water infrastructure;
- sewage discharges to the Solent;
- cumulative wastewater impacts.

6.7 Southern Water, as outlined above, have a statutory responsibility to provide capacity and sufficient treatment of foul flows from developments, to avoid environmental harm, in accordance with the Water Industry Act 1991 and the Environment Act 2021. This should also consider the cumulative impact of flows from other developments into each foul drainage catchment.

3. Combined impact with other development

Respondents frequently link drainage concerns to:

- *Haslar redevelopment;*
- *housing growth;*
- *wider infrastructure pressures within Gosport.*

6.8 The response above demonstrates the SuDS strategy will cap flows at QBAR for all events up to the 1 in 100-year +40% event. Southern Water will only take flows into the public surface water sewer once capacity has been provided, which can only be paid for with infrastructure charges from consented development such as what is proposed. Southern Water have a statutory responsibility to provide capacity for sewer flows and remediate their network as necessary to carry out their statutory responsibilities.

7.0 SUMMARY AND CONCLUSION

7.1 The FRA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national and local policy and guidance. The incorporated design measures as part of the development ensure known and residual risks can be managed.

7.2 A site-specific hydraulic modelling study has aided in determining, most accurately, a design flood level and proposed ground floor level of proposed buildings with an Environment Agency accepted freeboard allowance to provide a refuge. A Flood Evacuation Management Plan will be in place to avoid site occupants being isolated by flooding in most flood circumstances with an advanced evacuation, but site occupants and property will still be safe should a flood event occur onsite without sufficient warning.

7.3 A SuDS drainage strategy is proposed to manage surface water runoff rates post-development. This will be achieved through gravity discharge to a public surface water sewer within the wider site, with appropriate discharge rates and appropriately sized attenuation. Capacity in the surface water sewer will be provided by Southern Water in advance of a connection from the proposed development. This can be conditioned to ensure capacity and connection timelines align. The proposals offer betterment above the current undeveloped status of that site.

7.4 The surface water drainage strategy during the construction phase will be integrated into a Construction Environment Management Plan (CEMP). The quality of surface water runoff from the proposed development during the operational phase will be improved through the adoption of a SuDS drainage strategy. A maintenance and management plan will ensure the effectiveness of the drainage strategy for the lifetime of the development. Details can be managed through a condition.

7.5 There are no statutory objections on flood risk, drainage and water quality grounds. Concerns of other third parties are addressed by the submitted flood risk and drainage evidence. Additional information required can be secured by condition as outlined in the consultation letters from statutory bodies.

7.6 In my professional opinion the proposed site in discussion at this Inquiry, with regard to Flood Risk and Drainage, complies with National and Local Policies and should not be precluded on these grounds.

8.0 STATEMENT OF TRUTH

The evidence which I have prepared and provide in this written statement is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Artificial Intelligence ("AI") has not been used to draft or substantially rewrite text; produce a summary or analysis; generate or alter images or videos; or create content that goes beyond straightforward formatting or presentation.

Signature:

[redacted]

Scott Dawson BSc, MSc, MCIWEM, C.WEM

Date: 19th October 2026

APPENDIX A:
Shoreline Management Plan NCERM Extract

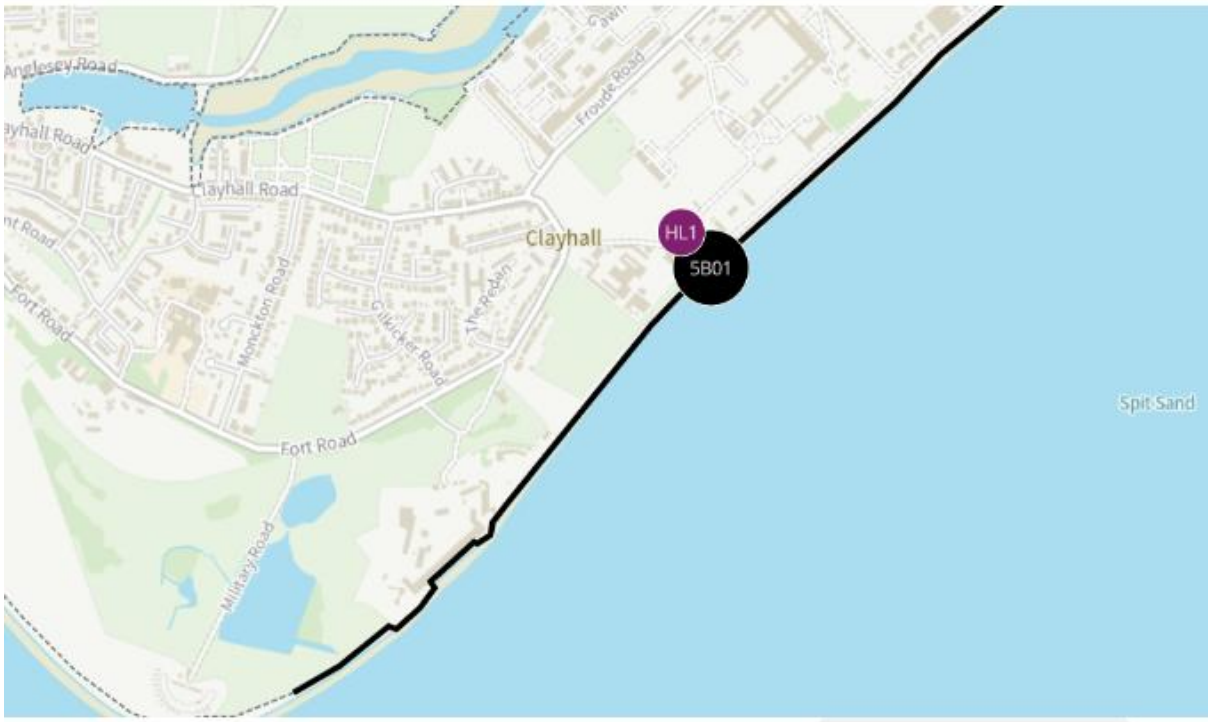
Unit

Portsmouth Harbour Entrance to Gilkicker Point 5B01

Summary management approach | Action Plan

Summary management approach

Continue to hold the existing defence line to continue protecting heritage features, MOD assets and infrastructure, residential property and amenity open space from flooding and erosion.



Legend | Click on the map for more information. | Customise map display

Generic approach assigned to this unit

> Management approaches depend on funding and relevant approvals and permissions. Adaptation to coastal change may be needed. Even where defences are present, some risk from storm surges or ground instability may remain.
>
> Time periods (short (0 to 20 years), medium (20 to 50 years) and long (50 to 100)) are approximate and do not signify precise dates of management transitions.
>
> Where shown, coastal erosion projections are for guidance only. They show areas of land likely to be at risk but do not show the precise future position of the shoreline, nor specific information for individual properties.

0 to 20 Years (2005 to 2025)

HL1 **Hold the line**
Maintain/replace

Where protection is currently provided by coastal defence structures or managed beaches, and the intention is to retain a defence along approximately the current alignment. This will involve replacing defences when needed. Defence type, method and standard of protection may be modified over time.

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20 to 50 Years (2025 to 2055)

HL1 **Hold the line**
Maintain/replace

Where protection is currently provided by coastal defence structures or managed beaches, and the intention is to retain a defence along approximately the current alignment. This will involve replacing defences when needed. Defence type, method and standard of protection may be modified over time.

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50 to 100 Years (2055 to 2105)

HL1 **Hold the line**
Maintain/replace

Where protection is currently provided by coastal defence structures or managed beaches, and the intention is to retain a defence along approximately the current alignment. This will involve replacing defences when needed. Defence type, method and standard of protection may be modified over time.

Neighbouring units

The following units are within 1km of this one:

Quay Lane (MOD boundary) to Portsmouth Harbour Entrance 5A25
Langstone Harbour entrance (harbour) to Portsmouth Harbour entrance 5API01
Langstone Harbour entrance (open coast) to Portsmouth Harbour entrance 5API02
Gilkicker Point to Meon Road, Titchfield Haven 5B02



1ST HORIZON

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