

Planning Policy Comments

Application No	APP/24/00237
Address	Land at Hermitage Park, Harts Farm Way, Havant
Development	Gas fuelled capacity mechanism embedded generation plant
Case Officer	JT
Comments By	JB
Date of Comments	7 June 2024

Policy Comments are sought on the acceptability of the proposal in flood risk terms.

The applicant has submitted a Flood Risk Assessment (FRA), which considers the risk on the site, and also covers the applicants' approach to the sequential and exception tests.

It is considered that the applicant is incorrect in principle in stating,

- In paragraph 3.12.2 of their FRA that the sequential test is generally undertaken at the strategic level by the LPA. While this is true, this does not exempt applicants from the need to also satisfy the test where it is required'; and
- in paragraph 3.12.8 of their FRA, that the sequential test is 'passed by default' because the proposal is for essential infrastructure. The notes to Table 2 in the PPG explicitly say 'This table does not show the application of the Sequential Test which should be applied first to guide development to the lowest flood risk areas'.

Nevertheless it is also noted, that the site is allocated for employment uses under Policy HB2 (site ref BD9), and that the allocations plan was supported by sequential testing using the same strategic flood risk assessment as forms the basis of future risk mapping now. While not strictly an employment use, the proposal is the kind of use that is expected to be seen on industrial estates. It is also noted, that proximity to a national grid connection point is required to avoid unnecessary power losses, and that this may be achieved here. Overall, it is therefore accepted that the sequential test does not need to be passed again. A similar development to the current proposal has also previously been accepted under ref APP/21/00809.

In terms of the exception test, providing power infrastructure to supply the national grid, it is accepted that the development provides sustainability benefits that may be considered to outweigh the flood risk. The remaining question then is whether the development can be considered to be safe and remain operational in the event of a flood event.

The applicant's FRA concludes the proposed facility would be unaffected by design return period fluvial or tidal flooding or by extreme fluvial flooding throughout its anticipated lifetime, but could potentially be affected from extreme tidal flooding towards the end of its anticipated lifetime (0.14m; low hazard). The FRA goes on to consider mitigation measures to this residual risk, and concludes that it is considered that with the outlined mitigation and management measures in place, the residual risks posed to the installation by tidal flooding can be reduced to an acceptable level.

Therefore, in order for the proposal to be acceptable in flood risk terms, the proposed mitigation measures as set out in the applicant's FRA at section 4.3 should be secured as part of this proposal.

