

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2025/126780/01-L01
Your ref: APP/25/00351
Date: 03 June 2025

Dear Sir/Madam

**PLANNING APPLICATION FOR A BATTERY ENERGY STORAGE SYSTEM ON
LAND AT PORTSMOUTH WATER BEDHAMPTON WATER TREATMENT WORKS,
MEYRICK ROAD, HAVANT, PO9 3HB**

BEDHAMPTON PUMPING STATION, MEYRICK ROAD, HAVANT

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA (*FLOOD_RISK_ASSESSMENT__DRAINAGE_STRATEGY-2116960.pdf*) dated March 2025) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist.

In this instance the FRA does not adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- **demonstrate that the development is ‘safe’**
- **consider whether flood risk will be increased in the surrounding area**
- **Flood risk mitigation measures to address flood risk for the lifetime of the development have not been included within the design. Consequently, the development proposes inadequate:**
 - **Freeboard allowances (for battery storage, buildings and associated equipment)**
 - **Flood storage compensation assessment**

Overcoming our objection

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

Advice to Applicant

Due to the recent release of new national model updates (NAFRA2) published on the 25th of March 2025, the site is now at higher risk of flooding from rivers and seas. The NAFRA2 model indicates that the site is now at high risk from fluvial flooding and is no longer considered negligible, as indicated within the submitted FRA. We request that the applicant considers the new national model updates and submit a revised site-specific flood risk assessment for the proposed development.

This FRA requires Product 4 information to indicate future flood levels for flood zones 2 and 3 for this site. Please contact SSDEnquiries@environment-agency.gov.uk (including a site map and grid reference) to obtain a Product 4 for your development. The applicant should indicate points on a detailed map where you require flood data.

Flood risk data requests will be based on existing EA hydraulic models for existing 1% and 0.5% annual probability events with an allowance for climate change. Note as climate change allowances are updated, we update our models but this work is not done immediately for all locations.

Data should be taken from the Product 4 to inform the future flood depths for the lifetime of the development of where battery storage, buildings and associated equipment are proposed.

You should refer to 'Flood risk assessments: climate change allowances' to check if the allowances modelled are appropriate for the type of development you are proposing and its location. You may need to undertake further assessment of future flood risk using different allowances to ensure your assessment of future flood risk is based on best available evidence. [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/flood-risk-assessments-climate-change-allowances). It is for the applicant to assess and determine which climate change allowances to use, and this should be justified. Freeboard allowance

An appropriate freeboard should be set compared to the 1 in 100-year design event plus climate change. The freeboard allowance should then be determined according to the residual risks of the site. It is up to the applicant to demonstrate and provide evidence to justify their freeboard allowance.

Further information can be found here - [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/accounting-for-residual-uncertainty-an-update-to-the-fluvial-freeboard-guide)

We acknowledge that the proposed development is considered 'essential infrastructure'

and 'minor development', but with the high risk associated with the site there is concerns that flood waters will be displaced by the proposed development. Therefore, floodplain storage compensation will need to be assessed. We require the applicant to complete a flood storage compensation assessment. To enable us to assess the impact to the flood plain, the applicant should demonstrate that any increase in built footprint within FZ3 (including climate change) can be directly compensated for.

Floodplain compensation should be provided on a 'level for level' basis, calculating the replacement of volumes lost from the floodplain through development, by reducing nearby ground levels connected to the floodplain. The compensatory volume must be at the same level, or provide a betterment, as the lost storage.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

Direct dial 02084745098

Direct fax

Direct e-mail suz.greenwood@environment-agency.gov.uk