

Subject: APP/25/00351 | 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

Dear Lesley,

APP/25/00351 | 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

Thank you for consulting me on this application.

The application is accompanied by an Ecological Impact Assessment (Enzygo, May 2025) and a Biodiversity Net Gain Statutory Metric and Condition Assessments (Enzygo, March 2025). This site has been subject to detailed ecological survey and assessment by Portsmouth Water in recent years. For example, application APP/20/00991 is accompanied by detailed ecological information including botanical surveys and a range of protected species surveys (e.g. bats, and roosts are present within buildings at the Bedhampton site). This application would have benefited from that previous ecological assessment work.

The application site comprises an area of partly-vegetated earth bunds with areas of hard surfacing, neutral grassland and dense scrub. I am content that the site is generally of limited ecological value (in terms of vegetation communities) but there is clearly potential for various protected and notable species to occur, especially nesting birds (within dense scrub) and common reptiles (within scrub/grassland areas). Standard avoidance and mitigation measures are provided, and these are acceptable. I would be happy to have these measures secured through a suitably worded condition.

I would highlight that both Small-flowered Buttercup and Wall Bedstraw occur within this site and have been recorded immediately north of the proposed development area in 2023. There is certainly potential for both these scarce county notable species to occur more widely, especially on any sparsely vegetated soils or shorter grassland. I would simply request that the potential presence of these two species is considered when site preparation works commence. Similarly, Himalayan Balsam and Japanese Knotweed both occur locally and could feasibly turn up anywhere. Again, the potential presence of these species should be considered very carefully during any construction works and especially post-development. The presence of Butterfly-bush is noted and this too is a species that could proliferate following ground disturbance.

The submitted BNG Metric includes a thumbnail of a post-development habitat plan, which appears to provide further detail on soft landscaping. I would request a full version of this plan – I note that the Landscape consultee has also requested details of landscaping. I am unable to comment fully on post-development habitats until such a plan is provided. This is relevant in the context of Biodiversity Net Gain.

In respect to Biodiversity Net Gain, the Statutory Metric has been completed correctly and shows that the development will achieve a net increase of 41.62% in habitat units (0.22 habitat unit uplift). There will also be a new section of native hedgerow, resulting in a 0.14 increase in hedgerow units. I am a little confused on the matter of watercourse unit increases. The adjacent Hermitage Stream is outside the development red line and it is therefore proposed to undertake some form of river restoration work to achieve an estimated 1376.30% increase in watercourse units. It is unclear whether this is an agreed and achievable outcome, or simply a recommendation. I would request further information on the deliverability of the proposed watercourse enhancement measures.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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