



Planning Statement

Bedhampton Water Treatment Works: Battery Energy Storage System

Land at Bedhampton Water Treatment Works, Meyrick Road, Havant, PO9 3HB

E101 HUB4 LTD

SHF.3055.001



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Planning Application for a Battery Energy Storage System on Land at Portsmouth Water Bedhampton Water Treatment Works, Meyrick Road, Havant, PO9 3HB

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For:	E101 HUB4 LTD
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1 INTRODUCTION

1.1 Introduction

- 1.1.1 This Planning Statement supports a planning application made by E101 HUB4 LTD Limited to undertake development works required for the construction of a 150MWh battery energy storage facility at Land at Portsmouth Water Bedhampton Water Treatment Works (WTW), Meyrick Road, Havant PO9 3HB. The facility would draw energy from the National Grid when demand is low, and supply is high and store it for release when required in periods of higher demand.
- 1.1.2 The Battery Energy Storage System (BESS) will make an important contribution to ensuring constant energy supplies at this time of constraints as we transition to increasing supply from renewable energy generation infrastructure and increasing demand from industry and communities, particularly from the widening use of electric vehicles, with the UK Government banning the sale of new petrol and diesel cars from 2035 and addressing an associated need for vehicle charging points.
- 1.1.3 BESS such as this facility will provide a key source of flexibility to help address some of the challenges associated with the transition to a low-carbon electricity sector. By storing energy when demand is low and releasing it over periods of extreme demand, the development will help the energy sector manage and cope with the peaks in supply and demand that the energy sector currently faces.
- 1.1.4 The renewable technology and infrastructure that currently exists within the energy mix are not, on their own, in a form from the UK can rely on to meet current and future demand requirements. This is primarily due to solar, wind and tidal providing an inconsistent supply. The variations in the amount of energy generated by these 100% renewable technologies are defined by factors outside of anyone's control (sunlight, wind strength, tidal flows etc.) To balance the inconsistencies and maintain a readily available and reliable supply, other standby STOR generation such as BESS, are required.
- 1.1.5 The development is for a temporary period and is fully reversible so that the BESS site can be fully restored upon decommission.
- 1.1.6 The site constitutes circa 1 hectare of made ground and is part of the wider Portsmouth Water Bedhampton WTW. Buildings associated with the water treatment works are located to the immediate north, alongside ground mounted solar panels. There are public rights of way within the site's wider vicinity, but none within the site's red line boundary.
- 1.1.7 This planning statement sets out the following:
- Site context of the application site;
 - Consideration of national planning policy and local policy framework;
 - Environmental considerations; and
 - Conclusions.

1.2 The Format of this Planning Application

1.2.1 The Planning Application contains the following documents:

- Completed Planning Application Forms;
- Completed Ownership Certificates;
- Planning Statement (this document);
- Design and Access Statement;
- Drawing Package;
- Preliminary Risk Assessment;
- Ecological Impact Assessment;
- Biodiversity Net Gain Matrix;
- Flood Risk Assessment and Drainage Strategy;
- Heritage Statement and Impact Assessment;
- Transport Statement;
- Construction Traffic Management Plan;
- Arboricultural Survey Report;
- Arboricultural Impact Assessment and Method Statement;
- Landscape and Visual Impact Assessment;
- Flood Risk Assessment;
- Noise Assessment; and
- Strategic Landscape Mitigation Plan (demonstrating the substantial new planting proposed that will benefit the proposal and its surroundings).

1.2.2 The Climate Change Committee's Sixth Carbon Budget Electricity generation¹ paper (2020) projects the UK's demand for electricity to increase by 50% by 2035 and 100% by 2050, reflecting increasing electrification of the economy (e.g. use of electric vehicles in transport).

1.2.3 A good and consistent energy supply is vital for economic growth. This is particularly relevant as we move from a dependency on fossil fuels to renewable energies. The supply of renewable energy is often variable (e.g. solar, wind). Developments such as that proposed will support the transition to renewable energy, by providing additional energy when other energy providers cannot meet demand. By supporting the transition to renewable energy, battery storage will support the positive environmental, social, and economic impacts associated with the generation of renewable energy and is a vital component of the energy supply as we move towards net zero 2050.

1.2.4 In terms of economic benefits, the proposed development would provide and support employment during construction and installation, and during operation and maintenance of the site.

1.2.5 The proposed development will contribute positively to the UK's transition from imported fossil fuels to home produced, de-carbonised, green energy and help to reverse the effects of climate change and protect future generations.

1.2.6 The proposed development would be environmentally sustainable insofar as it would support the move towards low carbon energy supplied by renewable energy developments, would

¹ <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Electricity-generation.pdf>

have a limited operational life, and so is temporary and fully reversible and would not cause harm in relation to noise, air quality or biodiversity, subject to the imposition of appropriate conditions where applicable.

- 1.2.7 The proposed location is considered to be appropriate for a number of reasons. The site is currently an underutilised parcel of land, with a willing landowner, and so is available and in close proximity to the Point of Connection.
- 1.2.8 The Point of Connection is the biggest constraint to a BESS, as without a suitable and available connection to the National Grid, there can be no project.
- 1.2.9 The proposed site is mostly within Flood Zone 1 and at negligible risk of surface water flooding. There are very few vehicle movements associated with this type of development following the short construction period, with low levels of noise and produces no harmful emissions.
- 1.2.10 Accordingly, there are minimal impacts associated with the type of development proposed, and crucially, there is, a financially viable and suitably near grid connection that can be secured to connect the energy storage scheme to the national grid.
- 1.2.11 The proposed development is entirely consistent with the NPPF and is considered sustainable development and supports the renewable energy commitments of the country, which are set in statute to be zero carbon by 2050.

2 SITE DESCRIPTION

2.1 Site Location

- 2.1.1 The proposed site is located within the administrative boundary of Havant Borough Council (HBC) and is a parcel of land at Portsmouth Water Bedhampton Water Treatment Works, Meyrick Road, Havant PO9 3HB. The grid reference is x: 4705033 y: 106310.
- 2.1.2 The red line application area is circa 2.5 acres/1 hectare, which is shown on the Proposed Site Location Plan (reference no DACI-4402-E03-REV01), and Figure 1 below.

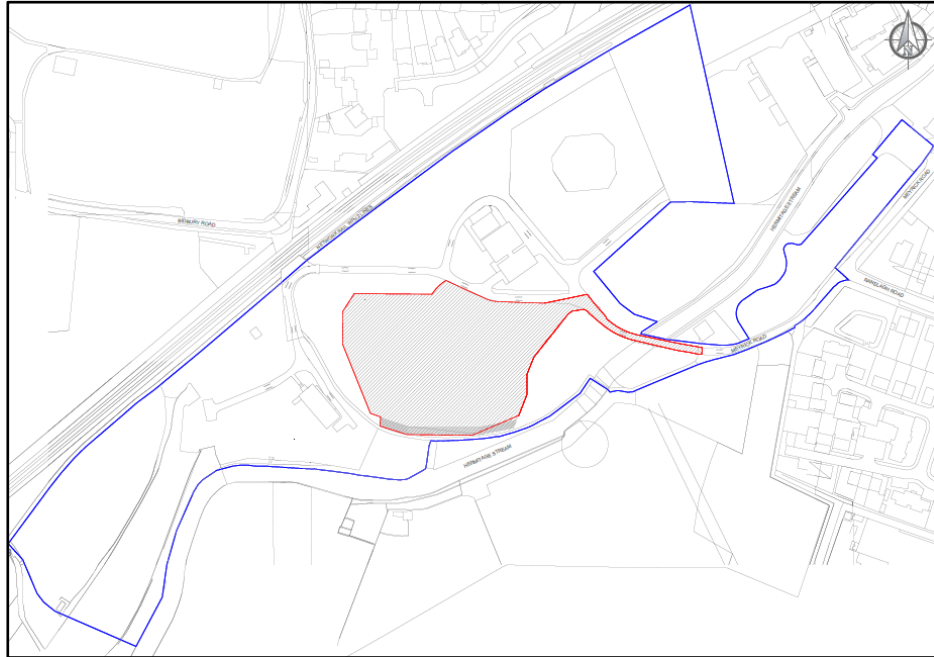


Figure 1: Site red line boundary

2.2 Current Use of the Site

- 2.2.1 The site constitutes made ground and is part of the wider Portsmouth Water Bedhampton WTW. Buildings associated with the water treatment works are located to the immediate north, alongside ground mounted solar panels. The northern boundary is adjacent to an internal road and features an intermittent hedgerow. The Bedhampton railway line lies beyond the site to the north and benefits from mature tree and hedgerow screening. Beyond the railway line is residential development. The JDP Havant pipe supplier's storage yard is located to the east and the Hermitage Stream runs adjacent to the southern site boundary.
- 2.2.2 The settlement of Bedhampton lies approximately 0.6km to the north, with Portsmouth located c.8.5km south west of the site.
- 2.2.3 The nearest dwellings to the proposed site are located approximately 40m to the north off King's Croft Lane, beyond the heavily trafficked Bedhampton railway line. The northern site boundary features mature vegetation located on an embankment which offers natural screening to the site from the residential dwellings.



Figure 2: Wider landscape (Site denoted by red line), Google 2024

2.3 Site Access

- 2.3.1 Access to the site, including construction traffic, will be taken via an internal road off Meyrick Road, which lies on the eastern site boundary and is the existing access arrangement for the waterworks.
- 2.3.2 Meyrick Road adjoins to the A27 Havant Bypass via Ranelagh Road and Brockhampton Road. This provides links to the wider strategic road network including the M27 (approximately 5.5km southwest of the site).
- 2.3.3 Following construction of the BESS, this access route will be used for maintenance vehicles for the lifetime of the battery storage, which are typically no more than fortnightly maintenance visits. The maintenance vehicles will predominantly be Transit van sized vehicles, that shall have no adverse impact upon the local highway network.

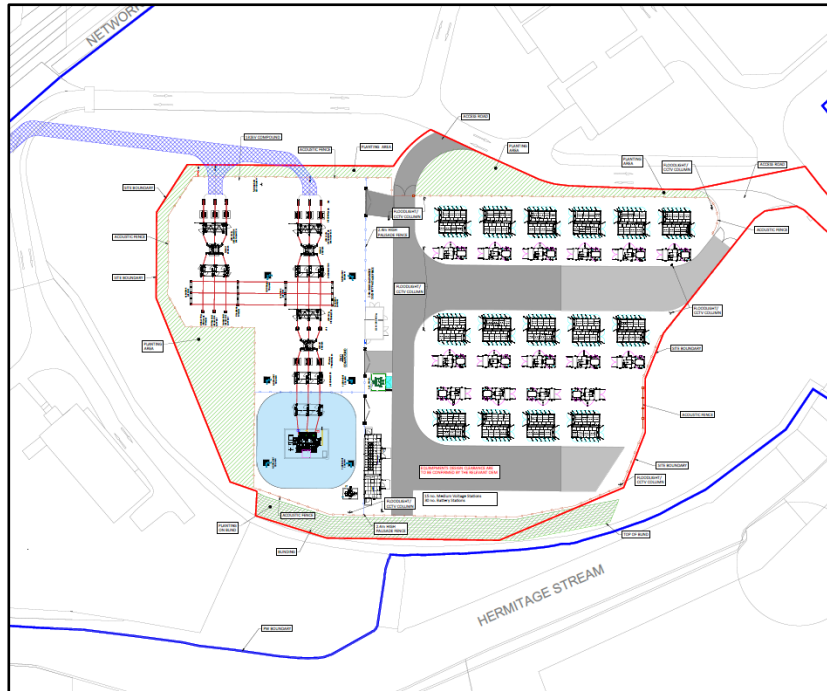


Figure 3: Proposed Site Area with Access Shown to Northeast of the Site

- 2.3.4 The proposed development includes access from the eastern boundary of the site, from Meyrick Road. At the proposed site access, Meyrick Road has an approximate width of 3.2m and runs broadly north-south. The initial section of Meyrick Road, to its junction with Knox Road is used only for access to the waterworks site.
- 2.3.5 Within the vicinity of the site, Meyrick Road is subject to a 30mph speed limit, with no parking restrictions throughout its entire length. Along Meyrick Road, minor access roads provide access to dwellings set back from the primary access road, however, Meyrick Road also provides direct frontage access to residential properties throughout its length.
- 2.3.6 A review of the crashmap.co.uk data for the last 5-year period (since 2018) for the local road network surrounding the site shows that there six incidents in that period, with three classified serious and three classified as slight. No accidents were recorded at the junction where West Street meets Meyrick Road.
- 2.3.7 This suggests there are no existing road safety issues on the highway network within the immediate vicinity of the Site. The proposed development is not expected to have a detrimental impact on this, particularly once operational, as it will result in negligible traffic generation, and accordingly the access is considered to be entirely suitable for the short construction period (8 - 10 months).
- 2.3.8 Further details regarding site access are found within the Design and Access Statement accompanying this application.

2.4 Sensitive Receptors in the Vicinity of the Site

- 2.4.1 Having reviewed the County Council's definitive PRow Map (refer to Figure 4) there are no Public Rights of Ways (PRowS) within the site itself.

- 2.4.2 There are several public rights of way within the wider landscape. Footpath 108/34/1 runs adjacent to the site's southern and western boundaries, which then follows the railway line before heading north towards Bedhampton.
- 2.4.3 The definitive PRoW Map identifies Footpath 108/34/1 as forming part of a long-distance walking route, Wayfarers Walk, being a 70-mile walking route split into six sections, starting on the chalk downs at Inkpen and finishing at Emsworth Harbour. Footpath 108/34/1 is located within the final section, Denmead to Emsworth.
- 2.4.4 The public right of ways will not be altered. Views of the site from users of the footpath network will be preserved with suitable vegetation and additional planting incorporated into the final layout design to provide effective screening to the facility.

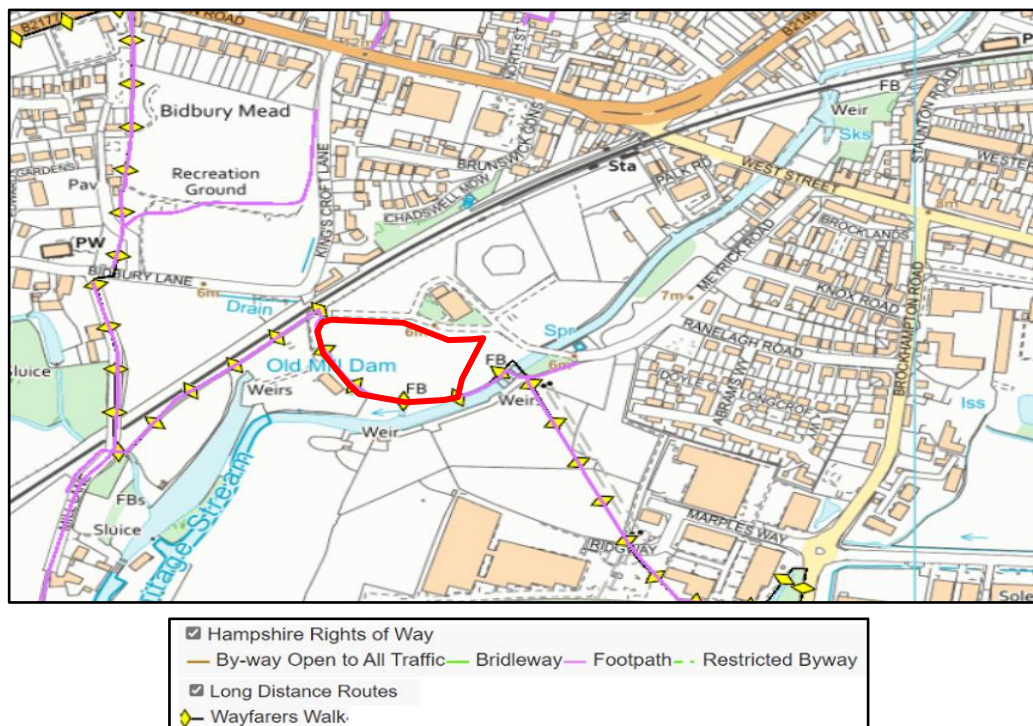


Figure 4: Public Rights of Way Map

- 2.4.5 The nearest residential properties are situated approximately 40m to the north of the site, located off King's Croft Lane, beyond the heavily trafficked Bedhampton railway line. The northern site boundary features mature vegetation located on an embankment which offers natural screening to the site from the residential dwellings.

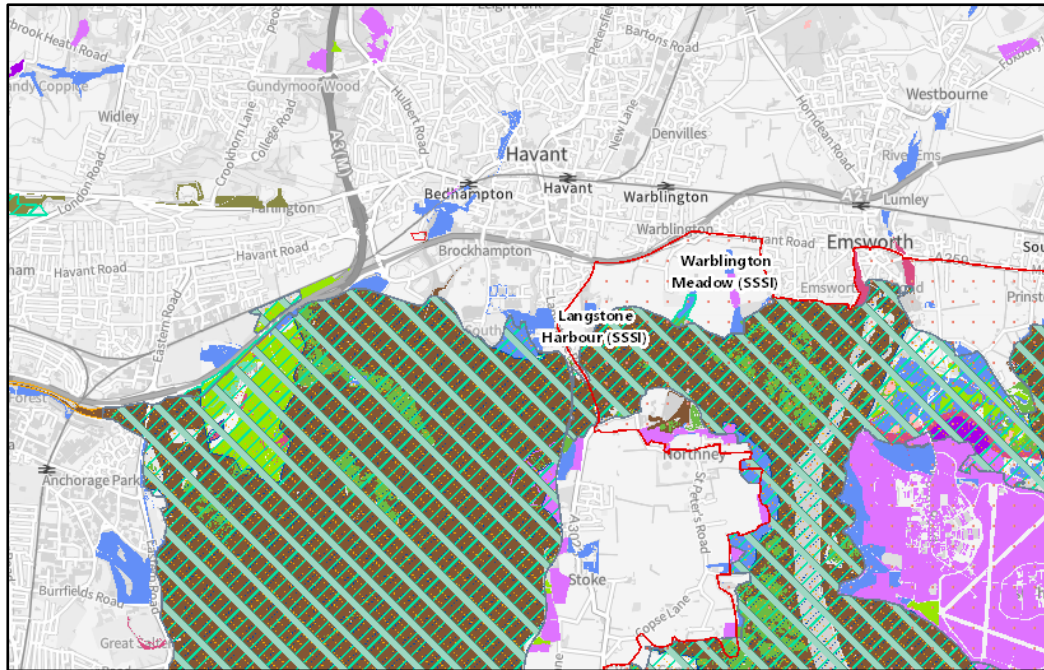


Figure 5: Magic Maps extract showing wider landscape

2.4.6 A review of the statutory and non-statutory designated sites within the locality has been undertaken using the Multi Agency Geographic Information for the Countryside (MAGIC) database provided by Defra, see Figure 5, whereby the following ecological assets lie within a 5km buffer of the site:

- Langstone Harbour (SSSI) – located approximately 1km south of the site
- Chichester and Langstone Harbours (Ramsar) – located approximately 1 km south of the site
- Chichester Harbour (AONB) – located approximately 1.6km south east of the site
- Hayling Billy (LNR) – located approximately 2.3km south east of the site
- Portsdown (SSSI) – located approximately 4.4km west of the site

2.4.7 The site is allocated to Policy DM23, an area of Uncertain Sites Brent Geese and/or Waders, in the Local Plan (Allocations) Policies Map.

2.4.8 The Solent Waders and Goose Strategy (2010) is a non-statutory document presenting evidence, analysis, and recommendations to inform decisions relating to strategic planning as well as individual development proposals. The strategy is related to internationally important Brent Goose and Wading Bird populations within and around the SPAs and Ramsar wetlands of the Solent Coast.

2.4.9 The Solent Waders and Goose Strategy does not identify the proposed development site as part of the network of habitat (refer to Figure 6), which demonstrates the site is not part of the functioning habitats for the identified birds. This will be confirmed when the ecological impact assessment to support the application is progressed with any phase 2 surveys completed as necessary.



Figure 6: The Solent Waders & Brent Goose Network (site denoted by red line)

2.5 Flood Risk

- 2.5.1 A search of the GOV.UK flood map for planning tool identifies that the site is located within Flood Zone 3, which means it has a high probability of flooding from rivers and the sea.
- 2.5.2 The site is partially in the mapped extent of surface water flooding at low to high risk, which is indicative of fluvial flooding and overland flows (refer to Figure 8).
- 2.5.3 There is an existing watercourse to the immediate south of the site, as evidenced by a culvert on the southern site boundary connecting to Hermitage Stream.
- 2.5.4 The NPPF Annex 3: Flood risk vulnerability classification describes battery storage facilities as being 'essential infrastructure', stating '*Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood.*' Accordingly, the development proposed, if necessary, can be located in areas at risk of flooding.
- 2.5.5 A SuDS drainage scheme shall manage surface runoff from the proposed development. Gravelled areas will be provided around the battery/concrete bases, which will allow runoff to shed onto permeable areas where it will be attenuated and infiltrated.
- 2.5.6 A Flood Risk Assessment accompanies the application to demonstrate that the proposed development can be operated with minimal risk from flooding, would not increase flood risk elsewhere, and is compliant with the requirements of national policy and guidance.



Figure 7: Flood Risk Map – site denoted by red box

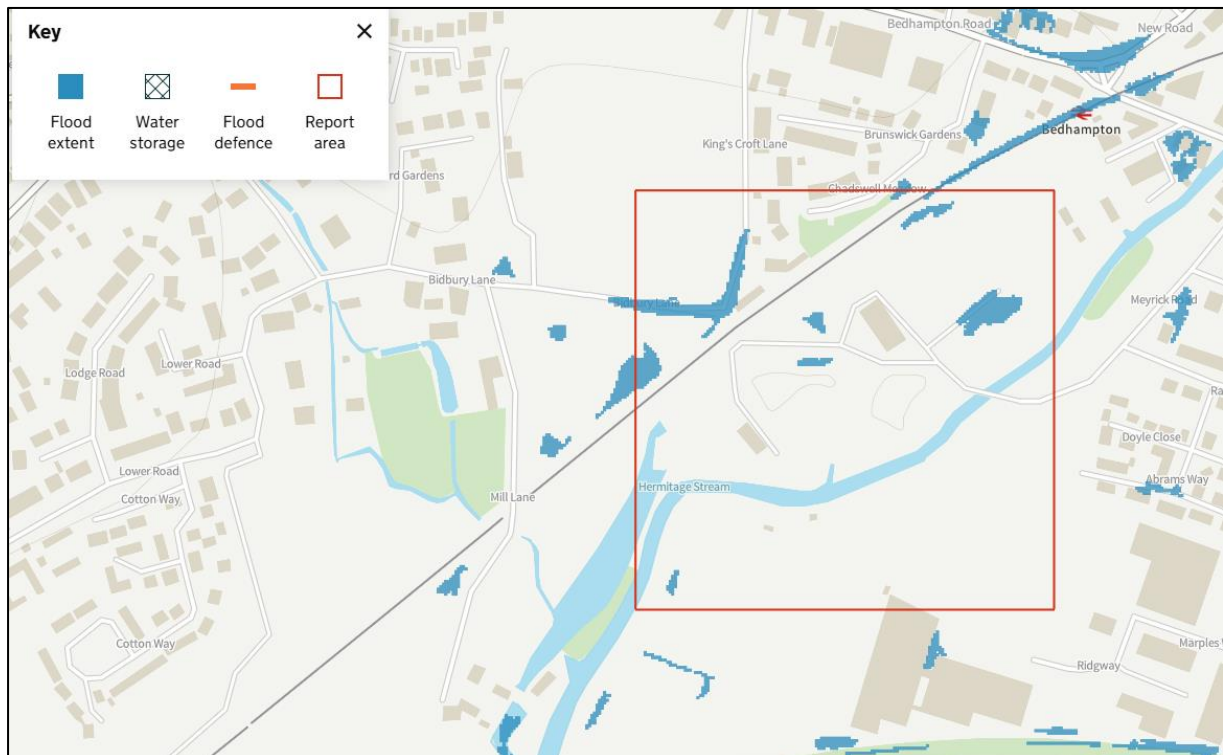


Figure 8: Surface water flooding map – site denoted by red box

2.6 Heritage Assets

2.6.1 There are no heritage assets within the site of the proposed development.

2.6.2 Within a 1km area of search there are 20 heritage assets (Figure 9), those closest to the site are:

- The Golden Lion (Grade II Listed) – 0.65km north of the site;
- Bedhampton Arts Centre (The Old School) (Grade II Listed) – 0.24km north of the site; and
- The Old Mill House (Grade II Listed) – 0.31km southwest of the site.
- Old Bedhampton (Conservation Area) – 0.03km north of the site.
- Brockhampton (Conservation Area) – 0.39km west of the site.

2.6.3 The site is considered to principally comprise of a post-industrial character in which the remains of 19th and 20th century waterwork infrastructure have been substantially affected by modern demolition, as such the potential for buried remains of archaeological interest to be present is extremely limited, owing to existing recent ground disturbances and past developments.

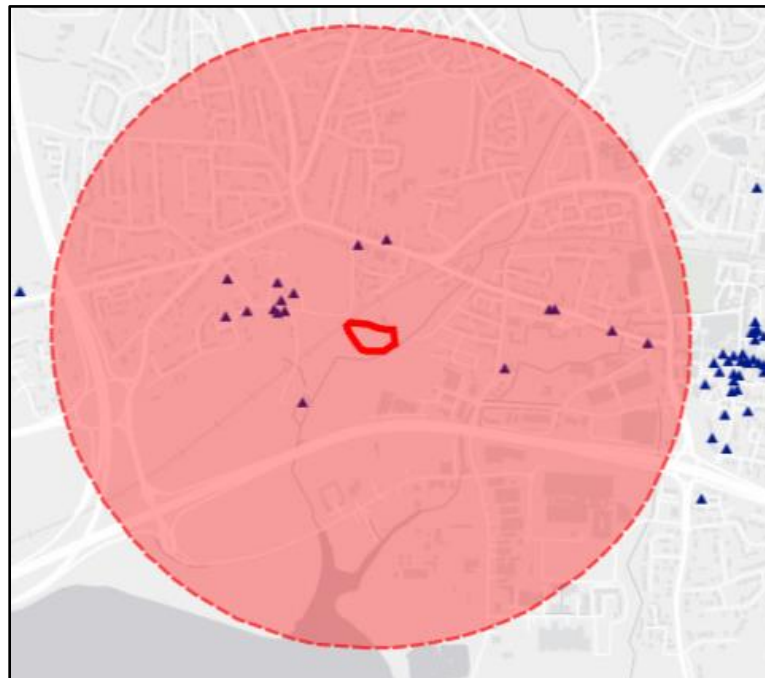


Figure 9: Historic England map (site denoted by red star)

2.7 Planning Allocations/ Designations

2.7.1 The local development plan for the application comprises of:

- Havant Borough Council Core Strategy (adopted March 2011)

2.8 Site Suitability

2.8.1 The submission of this application, follows a robust site search by the applicant, which has identified the site as being entirely suitable for the proposed development for a number of reasons:

- The site is located in close proximity to the point of connection which comprises existing dual 132kV underground circuits located within the footprint of the proposed

development site. The ability to connect to a suitable and viable point of connection is the defining factor in the location of a BESS.

- The local landscape has been shown to be able to assimilate the necessary energy infrastructure.
- The development has low impacts, with no emissions and very low noise levels. Surrounding commercial and residential receptors would not be affected due to the minimal impacts associated with the development, due to the separation distances available.
- The site is not subject to any ecological, landscape, or heritage designations.

2.8.2 A full assessment of the proposal against relevant national and local planning policy is provided within section 5 of this Planning Statement. This confirms that the proposal is consistent with all relevant planning policies. Section 6 confirms that the development is acceptable from a technical perspective.

3 PROPOSED DEVELOPMENT

3.1 Introduction

- 3.1.1 The proposed development would be for the provision of a battery energy storage system. Energy storage is the retention of energy produced at one time for use at a later time; the BESS would draw energy from the Grid when demand is low, and supply is high and store it for release when required in periods of higher demand.
- 3.1.2 The site layout shows that the site would include the following equipment:
- 132kV Switchyard
 - 132/33kV Power Transformer
 - DNO Protection / Control Room
 - Private 33kV Switchroom
 - Private Control Room
 - Private 33/0.4kV Auxiliary Transformer
 - Private Stores / Metering / Welfare Building [max 2.44m x 6.1m x max. height of 3m above ground]
 - 2.4m Palisade Fence
 - 3.5m Acoustic Fencing
 - 30 units of BESS containers
 - 15 units of Power Conversion System / Transformers
 - Parking for maintenance vehicles
 - CCTV Equipment
 - Site Lighting
- 3.1.3 Site access and internal service roads leading into the site compound are already established on the Portsmouth Water site and will provide safe access for the short construction phase of the project. This utilises the existing site access off Meyrick Road.
- 3.1.4 Once construction has been completed, access to the site for ongoing maintenance vehicles will take place via the existing site access into the Portsmouth Water facility. There will be limited traffic movements, with only scheduled monthly maintenance visits to the site.
- 3.1.5 The Point of Connection (PoC) between SSEN and the proposed BESS will be made via existing dual 132kV underground circuits located within the footprint of the proposed development site.
- 3.1.6 This PoC will sit between two major Grid Supply Points (GSPs) - Lovedean and Havant GSP. This capability will essentially provide backup / stored energy that can be deployed in either direction to support the wider electrical distribution and transmission networks where required.
- 3.1.7 The proposed development will not create any waste material in use.
- 3.1.8 The batteries are installed within insulated containers / modules set on individual concrete pads and have very low levels of noise pollution. Downward oriented motion activated lighting will be provided on each container, the welfare building, private substation and the DNO

room, in case of emergency out of hours maintenance visits. As such no light pollution can be expected from the development, except in the case of emergency.

- 3.1.9 The development will utilise existing technology that is well established and used successfully within operational battery energy storage facilities across the country. The development shall use the latest generation of this rapidly evolving technology. The batteries are lithium based which statistically are extremely safe, and each system where appropriate will be equipped with automatic fire detection and suppression systems. Maintenance staff shall visit the site to perform routine safety checks and maintenance; otherwise, the development will be controlled remotely.
- 3.1.10 The Design and Access Statement accompanying this application sets out further details of the equipment proposed, which is functional by nature.

3.2 The National Requirement for Energy Balancing Facilities

- 3.2.1 At a national level, the National Grid manage the supply and demand of electricity in order to maintain frequency. The frequency the grid operates is 50Hz, but if it drops below 49.5Hz or rises above 50.5Hz due to real-time demand, this could lead to energy shortages.
- 3.2.2 Where it is economical to do so, National Grid will procure part of this requirement ahead of time.
- 3.2.3 Standby facilities, with their capability for rapid response, are being used to assist National Grid to manage periods when energy demand outstrips supply, to balance the real-time changes in supply and demand. At this grid-scale, standby power facilities are required for providing the electricity network with power at short notice to help match supply with demand.

3.3 Benefits of the Proposed Development

- 3.3.1 The benefits of energy balancing facilities are widely accepted, and this is demonstrated further both within this section, and within National Policy which provides strong support for these types of developments (discussed in detail within section 5).
- 3.3.2 The UK's electricity supply system was designed with a high voltage transmission network across the country, transmitting electricity from large, centralised power stations. Sitting below this high voltage network are a number of regional electricity distribution areas, operated by Distribution Network Operators (DNOs).
- 3.3.3 Energy storage delivers numerous benefits to the consumer by helping to support both the National Grid and the DNOs. By spreading assets across the country, as opposed to large, centralised locations, facilities can provide regional benefits by limiting local electrical losses, increasing system efficiency, and helping integrate more renewable technology. They also provide nationwide benefits by responding to National Grid's requirements to support the UK electricity system.
- 3.3.4 Each region within England and Wales is managed by a different operator. To meet the increased demand for electricity, each regional DNO needs to invest significantly in their network by adding additional pylons, cabling, and infrastructure. As part of an electricity provider's commitment to the consumer, they must encourage investment and the

deployment of smarter network solutions. Energy balancing services are a critical part of smarter network solutions, and so are of great value both regionally and nationally.

3.3.5 In summary, the key benefits of power balancing facilities are:

- Contributing to ensuring the country has a good supply of electricity, even during peak hours or when power stations go offline. Small scale, fast-responding facilities such as that proposed can enable National Grid to meet demand without the need for new, large scale power generating facilities which can have much greater environmental and social impacts.
- Facilities such as that proposed will support the transition to renewable energy which can be variable, for example during periods of low wind or low levels of light. Therefore, the development will support the transition to a greater supply of renewable energy.
- Locally based power balancing facilities are highly efficient, as power is used to supply the local distribution network. As such, transmission losses which may otherwise occur can be largely avoided.
- The flexibility associated with the proposed development is one of its key advantages. It can be turned on or off as required, thus reducing wastage when energy is not required.
- The proposed development occupies a very small amount of land, and the land requirement per MW is much lower than other types of energy. Therefore, the development represents an efficient use of land.
- Battery storage facilities play a vital role in maintaining the Grid's stability, preventing power surges and outages, both of which can be detrimental to electrical infrastructure.

3.3.6 In addition to the immediate benefits, power balancing facilities will become increasingly important going forward for two key reasons:

- An inherent need for more energy storage, as highlighted within National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023).
- Due to the significant amount of variable renewable energy generation in the electricity system, and the transition towards more renewable energy in the future. By 2016, 31.3GW of renewable generation had been deployed. Solar PV, and more so wind, are difficult to predict. As per data collected by the UK Government, renewable energy generation accounted for 35.9% of the UK energy mix during July -September 2021. This was down 4% as a share of total generation, mainly due to unfavourable weather, and down 17% on the same quarter last year (Department for Business, Energy & Industrial Strategy – Energy Trends, 2021) This variability makes it extremely difficult for National Grid to manage instability and potentially black-out events.
- The ongoing increase of demand nationally for electricity. As heating and transport systems are electrified, peak demand will rise sharply leading to significant constraints on the electricity network assets. An example of this is the electrification of railways across the country. Such 'smarter' transport, which is faster, quieter, more reliable and most importantly more sustainable, can only be facilitated nationally if power balancing facilities are deployed nationwide.

- 3.3.7 Furthermore, the highly anticipated upsurge in usage of Electric Vehicles (EVs) in the near future shall add further unprecedented demand upon the energy network, with balancing facilities required to address this increase in demand.
- 3.3.8 To illustrate this, a standard home uses circa 4-10KWh a day (depending on house size and load), with an EV needing a dedicated 32A 7.2KWh charge unit. This will effectively double the power demand from each home each day with only one vehicle – where the average family has 2 -3 cars per household. To help address this ever-increasing demand, battery storage is a necessity.

3.4 Hours of Construction and Operation

- 3.4.1 The overall construction programme will be approximately 6 months, with construction restricted to 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 Saturday. No work shall be undertaken on Sundays or Bank Holidays.
- 3.4.2 Operationally, the proposed facility will generate few impacts. In terms of traffic, there would be one maintenance vehicle per week. No permanent staff will be based on site, and the facility shall be managed and monitored remotely. Thus, the proposed development will have no noticeable impact on the strategic highway network and there will be no significant increases in carbon emissions from traffic.

3.5 Employment

- 3.5.1 No staff will be based on site, as the facility will be managed remotely, but the site will be visited on a planned basis for scheduled maintenance inspections.
- 3.5.2 Although the development will not provide direct employment, it will indirectly contribute to employment within the development and manufacture of the equipment used on site. Standby facilities are a growing sector, and is likely to continue to develop, as detailed previously within this statement. The development will contribute to the continued growth of this sector, employment associated with this, and the associated supply chain.
- 3.5.3 In addition, a plentiful and reliable supply of energy is essential for a strong economy and future economic growth. By providing a reliable supply of energy, the development will contribute towards long term economic growth and associated employment and assist in providing energy security to the country.

3.6 Environmental Impact Assessment

- 3.6.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out in Schedule 1 those developments for which an Environmental Impacts Assessment (EIA) is mandatory and, in Schedule 2, those where an EIA may be required.
- 3.6.2 The proposed development does not fall within Schedule 1; therefore, an EIA is not a mandatory requirement.
- 3.6.3 Within Schedule 2, the development does not fall specifically within one category. However, Paragraph 3 (Energy Industry) and Paragraph 10 (Infrastructure Projects) are the most appropriate to this development.

- 3.6.4 Within Paragraph 3 of the most appropriate columns (a-e), the lowest threshold for requiring an EIA is if the development area exceeds 0.5 hectares, the area of new building or structures exceeds 500sqm, or a new building/deposit is within 100m of any controlled waterway. The later threshold relates to the storage of material, which is not applicable to this development.
- 3.6.5 In accordance with Part 4 Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), a Screening Opinion is required from the Local Planning Authority to clarify whether an Environmental Impact Assessment (EIA) will be required.
- 3.6.6 An EIA Screening Opinion was submitted and validated by Havant Borough Council on 29th April 2024, reference GEN/24/00497. On 30th September 2024, the Council provided their Screening Opinion Decision Report, which concluded the proposed development does not require an Environmental Impact Assessment (EIA), confirming that they do not consider that the proposal is likely to have significant effects on the environment and accordingly the proposal is not EIA development.

4 PLANNING HISTORY

4.1 Introduction

- 4.1.1 This chapter details the planning history of the site and identifies any prospective planning applications on adjacent land which may need to be considered.

4.2 Planning History

- 4.2.1 A Local Authority planning application search has been conducted, and applications at the Bedhampton Water Treatment Works are listed below.

- **APP/24/00204** - Application for the approval of Reserved Matters in respect of Shaft 1 (the Phase 1 Scheme) pursuant to Condition 2 of the outline planning permission under planning reference APP/20/00991 dated 15th October 2021 for the Pipeline from Bedhampton Springs to Havant Thicket Reservoir. Bedhampton Pumping Station, Meyrick Road, Havant. Registered 12 Mar 2024
- **APP/11/00030** - Remove existing parapet wall to treatment works building. Construct pitched roof over existing flat roof. Bedhampton No. 2 Water Treatment Works, Meyrick Road, Bedhampton. Grant perm/consent/certify lawfulness 07 Jan 2011
- **02/64177/000** - Change of use of open land to west of Meyrick Road to public open space (in association with residential development submitted under 02/67936/000 and 02/61715/000). Portsmouth Water at Ranelagh Road, Havant. Grant perm/consent/certify lawfulness 03 Feb 2003
- **96/57923/000** - Replace existing pumping station flat roof with slated pitched roof and modifications to north west and south west elevations. Bedhampton Pumping Station, Meyrick Road, Havant, Hampshire. Grant perm/consent/certify lawfulness 29 Jul 1996

5 PLANNING POLICY

5.1 Introduction

- 5.1.1 This chapter considers the proposed development against the relevant national planning policies, the Development Plan and other material considerations relevant to the proposal.

National Planning Policy

- National Planning Policy Framework (NPPF) (2024)
- Overarching National Policy Statement for Energy (EN-1) (2023)
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (2023)

Local Planning Policy

- Havant Borough Core Strategy (adopted 2011)

5.2 National Planning Policy

National Planning Policy Framework

- 5.2.1 The National Planning Policy Framework (NPPF) is the current national planning policy document in England and was updated in December 2024.
- 5.2.2 Paragraph 7 of the NPPF states that the *‘purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations- including the United Kingdom have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.’*
- 5.2.3 Paragraph 8 of the NPPF states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so opportunities can be taken to secure net gains across each of the different objectives):

- **An economic objective** - *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- **A social objective** – *to support strong, vibrant, and healthy communities, by ensuring that sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ healthy, social and cultural well-being; and*

- **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”
- 5.2.4 Paragraph 11 states that *‘Plans and decisions should apply a presumption in favour of sustainable development.’*
- 5.2.5 This means that:
 - *‘all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects’*
- 5.2.6 Paragraph 20 considers strategic policies, and states that: *‘...strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure, for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).’*
- 5.2.7 Paragraph 39 states that *‘Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.’*
- 5.2.8 Paragraph 85 notes that: *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*
- 5.2.9 Paragraph 88 in section 6 of the NPPF refers to supporting the rural economy and states that in supporting a prosperous rural economy planning decisions should enable *‘the development and diversification of agricultural and other land based rural businesses’*.
- 5.2.10 Section 14 refers to meeting the challenge of climate change and flooding. Paragraph 161 states that *‘The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.’*
- 5.2.11 Paragraph 168 sets out that when determining planning applications for renewable and low carbon development, local planning authorities should not require applications to demonstrate the overall need for renewable or low carbon energy and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future; recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application if its impacts are (or can be made acceptable).

- 5.2.12 The proposal represents sustainable development as it would enable energy to be stored on site when supply is higher than demand and then released during the periods of high demand. This will enable the energy network to be more consistent and reliable supply of energy and so more robust as demand continually increases.

National Policy Statements

- 5.2.13 The National Policy Statements were confirmed as being updated in the Chancellor's 2023 Autumn Statement, and inter alia cover the overarching needs case for different types of energy infrastructure.

Overarching National Policy Statement for Energy (EN-1) (2023)

- 5.2.14 The overarching National Policy Statement for Energy (EN-1) is part of a suite of NPSs issued by the Secretary of State of Department for Energy Security and Net Zero. It sets out the Government's policy for delivery of major energy infrastructure.
- 5.2.15 Paragraph 2.1.3 sets out that *'To produce enough energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness.'*
- 5.2.16 Paragraph 3.3.25 states that *'Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.'*
- 5.2.17 Paragraph 3.3.26 states that *'Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.'*
- 5.2.18 Paragraph 3.3.27 states that *'Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.'*
- 5.2.19 EN-1 highlights the importance of back up capacity to support the transition towards renewable energy. As such, the development is consistent with EN-1.

National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)

- 5.2.20 This National Policy Statement (NPS), taken together with the Overarching National Policy Statement for Energy (EN-1), provides the primary policy for decisions by the Secretary of State on applications they receive for nationally significant renewable energy infrastructure.
- 5.2.21 Paragraph 2.9.9 states *'electricity storage is essential for a net zero energy system, it stores electricity when it is abundant for periods when it is scarce, as well as providing a range of services to help maintain the resilience and stability of the grid.'*
- 5.2.22 Paragraph 2.9.10 recognises that *'the need for electricity storage is rising as we increase the volume of variable renewables and increase peak demand through the electrification of heat and transport. It will be critical to maintaining energy security as we shift away from gas over the 2020s-30s.'*

- 5.2.23 Paragraph 2.9.26 states *‘as the electricity grid sees increasing levels of generation from variable renewable generators such as offshore wind, onshore wind and solar power, there will be an increasing need for storage infrastructure to balance electricity supply and demand.’*

National Policy Statement for Electricity Networks Infrastructure (EN-5)

- 5.2.24 Paragraph 2.2.1 acknowledges that *‘new electricity networks infrastructure is not substantially within the control of the applicant.’* And at paragraph 2.2.2 that infrastructure’s *‘Siting is determined by:*
- *the location of new generating stations or other infrastructure requiring connection to the network, and/or*
 - *system capacity and resilience requirements determined by the Electricity System Operator.*

Planning Our Electric Future: A White Paper for Secure, Affordable and Low Carbon Energy (July 2011)

- 5.2.25 The 2011 White Paper sets out the UK Government’s commitment to transforming the UK’s electricity system, ensuring future electricity supply is secure, low-carbon and affordable, and that by 2030, the UK will have a flexible, smart, and responsive electricity system, powered by a diverse and secure range of low-carbon sources of electricity. To ensure continued international competitiveness, several unprecedented challenges need to be addressed, namely:
- Security of supply is threatened as existing generating plants close, noting that over the current decade around a quarter (20GW) of existing generation capacity will be lost as old plants close;
 - Decarbonising electricity generation to transform the UK permanently into a low carbon economy to meet renewable energy targets;
 - Accommodating increased demand for electricity, noting that despite improvements in domestic and non-domestic energy efficiency, overall demand for electricity is likely to double by 2050; and
 - Managing electricity costs, noting that whilst the UK is likely to experience short term fluctuations in power prices, it is likely that there will in the long-term be an overall increase in wholesale costs arising from the carbon price, stricter environmental policies, and major investment in new large-scale infrastructure.

UK Battery Strategy (2023)

- 5.2.26 The UK Government’s strategy states that *‘batteries will play an essential role in our energy transition and our ability to successfully achieve net zero by 2050. High capacity and reliable rechargeable batteries are a critical component of many devices, modes of transport, and our evolving energy generation capability’.*

British Energy Security Strategy (2022)

- 5.2.27 As part of the ESS, the UK Government increased the ambition for offshore wind and solar energy production and aims to improve the planning process for onshore wind. This is a welcome move that will help reduce dependence on fossil gas, whether for electricity

generation or hydrogen production, while accelerating progress towards the Government's objective to fully decarbonise electricity supply by 2035.

5.2.28 The UK Government is aiming for up to 70GW of solar by 2035. Solar capacity is currently 14GW and government sees potential for a five-fold increase in deployment up to 2035. The key goal is that 95% of UK power will come from renewables by 2030.

5.2.29 For the UK to meet its targets, there has to be a dramatic increase in battery storage facilities to help smooth out this transition. As the UK moves towards increasing its renewable energy supply, storage technologies like the proposed are increasingly important to support this transition to intermittent energy supply.

Regarding networks, storage and flexibility, the British Energy Security Strategy states that *'accelerating our domestic supply of clean and affordable electricity also requires accelerating the connecting network infrastructure to support it. Within this decade, our modern system will prioritise 2 key features: anticipating need because planning ahead minimises cost and public disruption; and hyper-flexibility in matching supply and demand so that minimal energy is wasted', and in ensuring a more flexible, efficient system for both generators and users 'encouraging all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate policy to enable investment'.*

Upgrading our Energy System: Smart Systems and Flexibility Plan (July 2017) and Progress Report (October 2018)

5.2.30 The Department for Business Energy and Industrial Strategy (BEIS) and Ofgem (2018) published a policy paper entitled: 'Upgrading our Energy System: Smart Systems and Flexibility Plan', setting out 29 objectives to remove barriers to smart technologies (such as battery storage); to encourage smart businesses and residences; and to enable energy markets access to new technologies and business models.

5.2.31 The actions are designed to support clean growth, reduce the cost of the energy system and keep energy bills low for consumers.

Clean Growth Strategy (October 2017)

5.2.32 The Clean Growth Strategy (2017) emphasises the UK's intent to deliver a *'diverse electricity system that supplies our homes and businesses with secure, affordable and clean power'*.

5.2.33 Furthermore, to achieve the aims of the strategy *'... means upgrading our electricity system so it is smarter (using data to provide greater control), more flexible (providing energy when it is needed) and takes advantage of rapidly developing technologies such as **energy storage**...'* (our emphasis).

5.2.34 The development herein proposed by this planning application would play a crucial role in the delivery of a low carbon economy, as envisaged by the strategy.

Energy White Paper – Powering our Net Zero Future (December 2020)

5.2.35 The Department for Business, Energy and Industrial Strategy (BEIS) published the Energy White Paper 'Powering our Net Zero Future' (2020) addresses the transformation of our

energy system and informs how the UK will modernise the energy system to facilitate the aim of net zero emissions by 2050.

- 5.2.36 The Paper contains a 'Ten Point Plan', setting out, amongst other aims, that the offshore wind capacity shall be quadrupled by 2030, with a target of 40GW.
- 5.2.37 Accordingly, developing energy storage infrastructure, such as that proposed in this application, will play a vital role in capturing this energy to be used by homes and businesses in the UK as required.
- 5.2.38 The Paper states '*by 2050, we expect low-carbon options, such as clean hydrogen and long-duration storage, to satisfy the need for peaking capacity and ensure security of supply at low cost, likely eliminating the reliance on generation from unabated gas.*'
- 5.2.39 It is clear from the evolving policy guidance in respect of the energy sector in the UK, the Government sees battery storage as a crucial element in the overall strategy to ensure energy security. The need to have energy security has become increasingly clear with recent events in Ukraine and the impact this has had on European energy supplies and significant impacts from rising costs for the UK.

Clean Power 2030 Action Plan: A new era of clean electricity (2024)

- 5.2.40 The UK government set out an "action plan" for reaching its target of clean power by 2030, which it describes as '*the most ambitious reforms to our energy system in generations*'.
- 5.2.41 The action plan outlines the government's ambition to '*make Britain a clean energy superpower to cut bills, create jobs and deliver security with cheaper, zero-carbon electricity by 2030*'.
- 5.2.42 Following independent advice from the National Energy System Operator (NESO), the government is aiming for clean power to meet 100% of electricity demand by 2030, with at least 95% of electricity generation coming from low-carbon sources and no more than 5% from unabated gas.
- 5.2.43 The action plan outlines steps to expand and improve the electricity grid, saying that a failure to strengthen it '*risks holding back our energy security, economic growth and other important infrastructure with lengthy delays*'.

5.3 Local Planning Policy

- 5.3.1 The Havant Borough Core Strategy (March 2011) is the over-arching document which sets the overall policy framework for all other local development documents in the Borough. The strategy document contains strategic policies and some detailed development management policies against which individual planning applications will be assessed. When considering planning applications, the Council will consider all the policies in the Core Strategy that are relevant to the proposal.
- 5.3.2 The Building a Better Future Plan will be the new Local Plan for Havant Borough. The Local Plan will address the needs and opportunities for development in the Borough, and set out how much, what type and where development will take place. As the emerging Local Plan is at an early stage of preparation it is not considered relevant to the planning balance.

5.3.3 The policies within the Local Plan considered relevant to the proposed development are listed and detailed below:

- Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- Policy CS14 Efficient Use of Resources
- Policy CS15 Flood and Coastal Erosion Risk
- Policy CS16 High Quality Design
- Policy CS19 Provision of Infrastructure
- Policy DM8 Conservation, Protection and Enhancement of Existing Natural Features
- Policy DM9 Development in the Coastal Zone
- Policy DM23 Site for Brent Geese and Waders

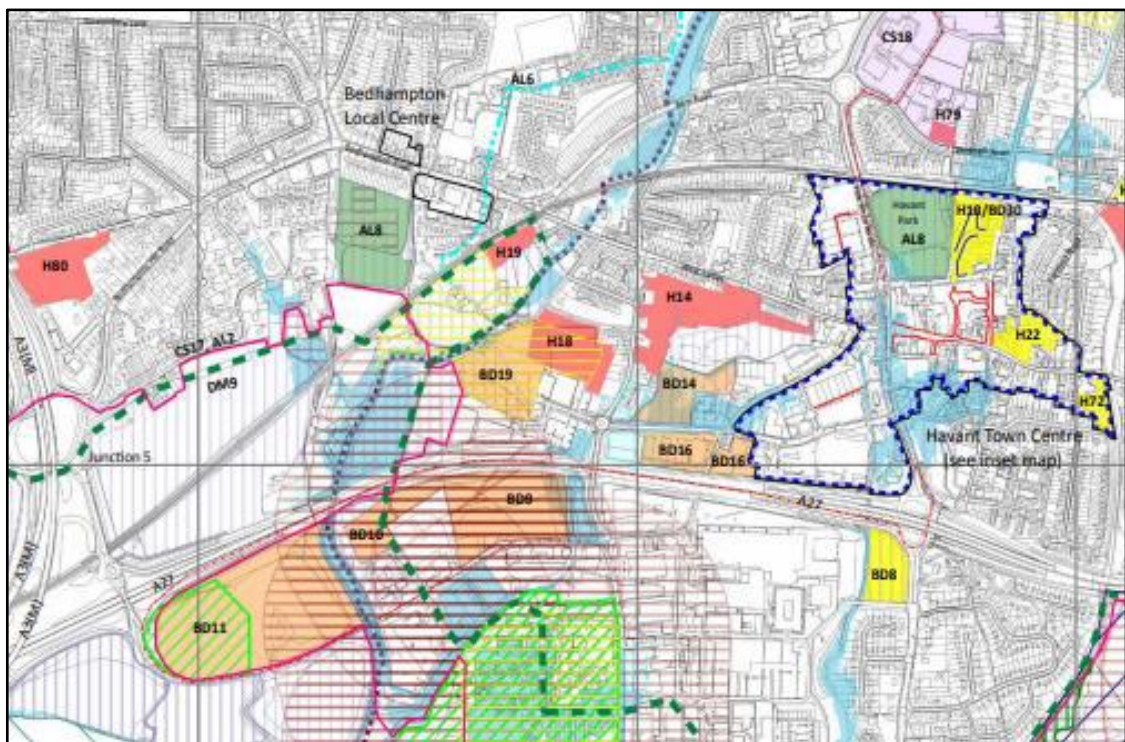


Figure 10 - Extract – Havant Policies Map & Key (Map 7 – South of Havant and Bedhampton) (site denoted by red line)

5.3.4 **Policy CS19 – Effective Provision of Infrastructure:** states ‘Planning permission will be permitted where:

8. It safeguards the requirements of infrastructure providers, in particular to bus corridor enhancements, telecommunications equipment (particularly high speed broadband), electricity power lines, high pressure gas mains, educational facilities, particularly those due for improvement under Building Schools for the Future , health facilities at Oak Park, flood protection measures, aquifer protection areas, a winter storage reservoir at Havant Thicket, additional water treatment infrastructure at Kingscroft Farm and Bedhampton and waste water treatment works at Budds Farm.’

The site is identified as safeguarded for infrastructure. It is considered a BESS would complement the aims of Policy CS19, whilst enabling energy balancing within proximity of an identified Point of Capacity with sufficient capacity.

- 5.3.5 **Policy CS14 – Efficient Use of Resources:** This policy states that *‘Planning permission will be granted for development that:*
- 5.3.6 *2. Locally contributes to the delivery of the Partnership for Urban South Hampshire (PUSH) target of 100MW of renewable energy by 2020 for the whole PUSH area. Major areas of development must ensure that their on-site renewable energy production is maximised, and resource efficiency is maximised.’*
- 5.3.7 The Partnership for Urban South Hampshire comprises the twelve local authorities around the Solent that aim to improve the environmental, cultural, and economic performance of the South Hampshire area. The partnership focuses on three areas of work: Housing, Energy and green environment, and Cultural and creative industry initiatives.
- 5.3.8 Whilst the proposed development would not directly generate energy, it would help to balance an increasing volatile grid and supplement the development of renewable energy provision, providing new infrastructure that is fully complementary and required to enable the future deployment of an increasingly renewable energy supply, and is therefore in accordance with Policy CS14.
- 5.3.9 **Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough:** This policy sets out that development must protect and enhance the rich and varied landscape of the Borough, the open space, biodiversity and built heritage. The development must not harm the natural and built environment which forms the Borough’s identity.
- 5.3.10 A Heritage Impact Assessment has been submitted and considers the impact of the proposed development on the surrounding designated heritage assets and the historic environment, and concludes the proposed scheme is considered to have a neutral effect on the historic environment and is therefore in accordance with national and local planning policy.
- 5.3.11 **Policy CS15 – Flood and Coastal Erosion Risk:** This policy states *‘A site-specific flood risk assessment demonstrates that the development will be safe, including the access, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall’* is required for the development of areas at risk of flooding now and in the future as identified on the latest Environment Agency flood risk maps.
- 5.3.12 Within the PPG ID: 7 the proposed development is defined as ‘essential infrastructure’. The development would be compatible with NPPF and PPG ID: 7 after to completion of a satisfactory Flood Risk Assessment, inclusive of mitigation measures and a SuDs Drainage Strategy.
- 5.3.13 A site-specific Flood Risk Assessment has been submitted in regard to the proposed development, in accordance with Policy CS15, and demonstrates the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere.
- 5.3.14 **Policy CS16 – High Quality Design:** This policy states *‘Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax.’*

- 5.3.15 The proposed infrastructure is functional by nature in design and landscaping, being used for the storage of energy. The proposed BESS will be in keeping with the wider utilitarian buildings on the Portsmouth Water WTW site.
- 5.3.16 The proposed development therefore accords with Policy CS16.
- 5.3.17 **Policy DM8 – Conservation, Protection and Enhancement of Existing Natural Features:** states *‘Development will only be permitted where it protects and enhances local habitats and landscape distinctiveness and which addresses all of the relevant criteria as set out below:*
- 5.3.18 *Protects natural features of nature conservation and/or amenity importance on the site, for example trees, woodlands, hedgerows, soils, streams, stream corridors, springs, ditches or ponds from damage, destruction, and a deterioration in quality.*
- 5.3.19 *Sympathetically incorporates existing features into the overall design of the scheme including measures taken to ensure their continued survival.*
- 5.3.20 *Provides new landscape works that integrate successfully with the local environment and existing natural features, using local materials and plant species and making provision for future maintenance of new landscape works associated with new developments.*
- 5.3.21 *Ensures sequences of greenspaces are maintained and protects the attractiveness and visual amenity of all green open spaces that contribute to the identity of the borough.’*
- 5.3.22 The site consists of poor quality made ground, characterised by numerous large bunds and features existing boundary vegetation. The trees and shrubs located on the site boundaries will be retained where possible. A soft landscaping plan will be developed, creating green infrastructure and habitat linkages across the site.
- 5.3.23 Enzygo Ltd have produced a Landscape and Visual Impact Assessment which demonstrates the facility would have limited adverse effects on the landscape and visual amenity of the area, with mitigatory planting proposed to further screen the site from local receptors, which demonstrates compliance with Policy DM8.
- 5.3.24 **Policy DM9 – Development in the Coastal Zone:** This policy states *‘Planning Permission will only be granted for development in the coastal zone which addresses all of the relevant criteria as set out below as shown on the Proposals Map:*
- 1. Has no harmful effects on nature conservation within the Chichester and Langstone Harbour SSSIs and SPA, Solent Maritime SAC and Ramsar site, or any SINC and Local Nature Reserves.*
 - 2. Maintains and enhances the appearance and distinctiveness of existing settlements and landmarks along the coast.*
 - 3. Contributes positively to the landscape and has regard to best practice on the design of new building in coastal locations.*
 - 4. Upgrades existing footpaths and ensures that public access is retained and provided to connect existing paths along the waterfront where appropriate.*
- 5.3.25 Policy DM9 is applicable to the site and the proposed development due to the proximity of ecological designations and the existing footpaths, to the proposed site boundary.

- 5.3.26 A Ecological Impact Appraisal has been submitted in support of the application to demonstrate accordance with Policy DM9 part 1. The report demonstrates that if the outlined mitigation measures are implemented in full, then no significant residual impact could be expected, and the proposed application will result in 'no net loss in biodiversity'.
- 5.3.27 **Policy DM23 – Sites for Brent Geese and Waders:** states '*Planning permission will be granted for developments that avoid important sites for Brent Geese and/or waders outside of the statutory designated areas, identified on the Policies Map.*
- 5.3.28 *Where this cannot be avoided, development proposals on or adjacent to an important Brent Goose and/or wader site outside of the statutory designated areas will need to demonstrate levels of impact, alone and in combination with other proposals subject to the tests of the Habitats Regulations.*
- 5.3.29 *Where a negative impact upon a site cannot be avoided or satisfactorily mitigated, and the tests of the Habitats Regulations are met as necessary, replacement feeding/roosting habitat, on a no net loss basis, will be sought. Where a negative impact upon an important site cannot be avoided or mitigated and replacement feeding/roosting habitat is not or cannot be provided on a no net loss basis, the proposal will be refused.*
- 5.3.30 *Planning permission will be granted for development on or adjacent to uncertain sites for Brent Geese and/or waders outside of the statutory designated areas, where appropriate surveys are undertaken and it is determined that the site has no importance.'*
- 5.3.31 The Solent Waders and Goose Strategy does not identify the proposed development site as part of the network of habitat, which demonstrates the site is not part of the functioning habitats for the identified birds.

6 ASSESSMENT OF ENVIRONMENTAL IMPACTS

6.1 Introduction

- 6.1.1 In this chapter, the potential environmental impacts of the proposed development are set out and considered. Where appropriate, this draws on technical assessments submitted in support of the planning application, and identifies any mitigation proposed to minimise any identified impacts to an acceptable level.

6.2 Flood Risk

- 6.2.1 Most of the site is located within Flood Zone 1, with the southeastern corner within Flood Zone 3.
- 6.2.2 Battery storage facilities, such as the one being proposed, are classed as essential infrastructure in the NPPF's flood risk vulnerability classification, and therefore entirely appropriate for the proposed location.
- 6.2.3 A SuDS drainage scheme is proposed to manage runoff from the development, to suitably mitigate surface water flooding.
- 6.2.4 A Flood Risk Assessment (ref. SHF.3055.001.HY.R.001.A) and drainage details, produced by Enzygo Ltd, has been submitted with the application to demonstrate that the proposed development can be operated with minimal risk from flooding, would not increase flood risk elsewhere, and is compliant with the requirements of national policy and guidance.
- 6.2.5 The Flood Risk Assessment identified the following:
- The risk of fluvial flooding is assessed as negligible.
 - The risk of tidal flooding is assessed as negligible for most of the Site and medium along the southeastern boundary.
 - The risk of groundwater flooding is assessed as high for the entire Site.
 - The risk of surface water flooding is assessed as negligible for most of the Site and low along surface water flow pathways and ponding.
 - The risk of flooding from sewers is assessed as negligible for most of the Site and low along the reaches of the identified assets.
 - The risk of flooding from all other sources is assessed as negligible.
 - A SuDS drainage scheme is proposed to manage excess runoff from the development, comprising a geocellular attenuation tanks designed to maintain runoff at pre-development rates, with an outfall to Hermitage Stream.
- 6.2.6 Accordingly, the proposed development should not be precluded on the grounds of flood risk and surface water drainage.

6.3 Noise

- 6.3.1 A noise impact assessment has been undertaken by Enzygo Ltd to assess the potential noise impacts associated with the proposed development, in accordance with the relevant standards and guidance, at the nearest noise-sensitive receptors to the site.
- 6.3.2 The assessment has been undertaken in accordance with the guidance contained in British Standard 4142:2014+A1:2019 Method for rating and assessing industrial and commercial sound (BS4142) with reference made to the internal noise criteria outlined in British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings (BS8233).
- 6.3.3 Noise levels generated by the proposed development, at the nearby noise-sensitive receptors, has been predicted using the calculation methodology outlined in ISO9613:1996 'Acoustics – Attenuation of sound during propagation outdoors – Part 2: Engineering method for the prediction of sound pressure levels outdoors (ISO9613) using the proprietary noise modelling software CadnaA.
- 6.3.4 The BS4142 assessment has shown that daytime predicted sound rating levels would be below prevailing background noise levels at the nearest receptors assessed. Within the context of local noise climate, i.e., predicted specific sound levels being below the prevailing ambient noise levels, the specific sound would have a low impact. This is considered to fall within the 'No Observed Effect Level' detailed in the PPG.
- 6.3.5 At night the BS8233 assessment, made in accordance with the guidance outlined in BS4142, has shown that the guideline internal noise level of 30dB LAeq,8hr for sleeping in bedrooms would be easily met at the nearest receptors assessed. This is considered to fall within the 'No Observed Effect Level' detailed in the PPG.
- 6.3.6 In terms of noise generation, based on the findings of the assessment, it is therefore considered that the proposed development, which would operate to support the National Grid during peak power demand periods, would be able to operate without adversely affecting nearby sensitive receptors in terms of acoustic impacts, and there are no reasons, on noise grounds, why planning consent for the proposed BESS facility cannot be granted.

6.4 Transport

- 6.4.1 Vehicle movements associated with the proposed development will be very low, which is detailed in the submitted Construction Management Plan.
- 6.4.2 During the circa 6 months construction period it is anticipated that approximately 250 HGV deliveries will be required. This is an average of 42 HGV deliveries per month, or c. 2 per day. This is subject to change as the precise number of movements can only be finalised when a contractor is appointed, construction methods are agreed, and a construction timetable drawn up.
- 6.4.3 Accordingly, the proposals should not have a significant impact upon the local road network on a daily basis. The vehicle movements will be managed through a Construction Traffic Management Plan.
- 6.4.4 Access to the site for construction vehicles will be taken via the existing gated access from Meyrick Road, which serves site's the existing use.

- 6.4.5 It has been demonstrated within the Transport Statement that a suitable access can be provided from Meyrick Road. The access has been designed to accommodate the largest construction vehicle likely to require access to the site.
- 6.4.6 Safety measures will be applied to manage the possibility of any disturbance caused by construction traffic, including:
- Use of Banksman;
 - Management of deliveries through a booking system, outside of the weekday AM and PM Peak hours (08:00 – 09:00 and 16:00 – 17:00);
 - Restricting working hours to 0700-1900 Monday – Friday, 0800-1300 on Saturdays and no construction work taking place on Sundays or Bank Holidays;
 - Consultation and ongoing communication with neighbouring businesses and properties; and
 - Wheel wash facilities to prevent mud and debris entering the public highway.
- 6.4.7 Once construction has been completed there will be limited traffic impacts. There will be a maximum of one maintenance vehicle per week. This ongoing access to the site for maintenance vehicles will take place via the existing access from Meyrick Road.
- 6.4.8 No permanent staff will be based on site, and the facility is managed and monitored remotely. Therefore, the proposed development will not impact on the strategic highway network, and there will be no significant increases in carbon emissions from traffic.

6.5 Air Quality

- 6.5.1 There will be no emissions associated within the facility itself. Therefore, an air quality impact assessment is not required as part of the application. In addition, the proposal will result in a negligible increase in vehicle movements, as demonstrated by the Construction Traffic Management Plan.

6.6 Ecology

- 6.6.1 The site is allocated to Policy DM23, an area of Uncertain Sites Brent Geese and/or Waders, in the Local Plan (Allocations) Policies Map.
- 6.6.2 There are also a number of ecological assets within a 5km buffer, reflecting the sites proximity to the coast. Those closest are:
- Langstone Harbour (SSSI) – located approx. 1km south of the site;
 - Chichester and Langstone Harbours (Ramsar) – located approx. 1km south of the site;
 - Chichester Harbour (AONB) – located approx. 1.6km south east of the site;
 - Hayling Billy (LNR) – located approx. 2.3km south east of the site; and
 - Portsdown (SSSI) – located approx. 4.4km west of the site.
- 6.6.3 The Solent Waders and Goose Strategy (2010) is a non-statutory document presenting evidence, analysis, and recommendations to inform decisions relating to strategic planning as well as individual development proposals. The strategy is related to internationally important

Brent Goose and Wading Bird populations within and around the SPAs and Ramsar wetlands of the Solent Coast.

- 6.6.4 The Solent Waders and Goose Strategy does not identify the proposed development site as part of the network of habitat (refer to Figure 7), which demonstrates the site is not part of the functioning habitats for the identified birds.
- 6.6.5 An Ecological Impact Appraisal (EclA) has been undertaken to identify potential ecological constraints and associated recommendations to avoid / mitigate/ compensate for the potential impacts.
- 6.6.6 It is concluded that the proposal presents opportunities for biodiversity enhancement to achieve an overall biodiversity net gain in accordance with national and local policies through providing enhanced opportunities for nesting birds and roosting bats, and landscape planting.
- 6.6.7 The following key ecological features and associated recommendations have been identified:
- **Chichester and Langstone Harbours Ramsar/SPA/SSSI, Solent Maritime SAC, IRZ, Solent Water and Brent Goose Strategy, Wintering & Migratory Birds** – At discretion of planning officer, consultation with Natural England to determine need for any Habitats Regulation Assessment (HRA), Nutrient Neutrality assessment, and any associated protected species surveys i.e. Wintering Bird Surveys. Standard hydrological pollution control measures and construction practices to be implemented.
 - **Blue Infrastructure, Coastal and Floodplain Grazing Marsh HPI, River HPI (Hermitage stream & Chalk Aquifer), Otter and Water Vole** – The adjacent brook and HPI will be protected throughout the construction phase, standard hydrological pollution control measures.
 - **Green Infrastructure** – Protection of trees in accordance with BS5837:2012.
 - **Bats** – Sensitive lighting scheme.
 - **Badger** –All construction works shall be undertaken in accordance with a set of best practice precautionary reasonable avoidance measures.
 - **Breeding Birds** –Clearance of vegetation to take place outside of the nesting bird season or under supervision of ECoW.
 - **Common Reptiles** – Sensitive site clearance under supervision of ECoW.
 - **Invasive Flora** – An invasive species contractor should advise on appropriate measures to treat/ eradicate and/or prevent the spread in the wild of the Buddleja and Himalayan Balsam.
 - **Priority Species** – Sensitive site clearance under supervision of ECoW.
- 6.6.8 The EclA demonstrates that, if the outlined mitigation measures are implemented in full then no significant residual impact could be expected, and the proposed development will result in ‘no net loss in biodiversity,’ whilst also providing ‘biodiversity net gain’ in accordance with NPPF and Local Planning Policy.
- 6.6.9 As such, no significant residual impact can be expected which would prevent determination of a planning application or development of this site.

6.7 Ground Conditions

- 6.7.1 A Phase 1 Environmental Report has been undertaken to assess the implications of any potential environmental risks, liabilities and development constraints associated with the proposed development site. The report concludes that the site is considered to present a low to moderate potential contamination and geotechnical risk to both construction workers and future site users. The Site would be considered low sensitivity due to the nature of the Proposed Development, as effectively there will be no 'end users'.
- 6.7.2 Any unexpected contamination is anticipated to be localised and would be addressed during the development works through a discovery strategy, with source removal and off-site disposal likely to be the most appropriate remedial action, or the use of a clean capping [where appropriate].
- 6.7.3 A Ground Investigation would be recommended to quantify above risks and provide design information for the proposed future development. This could be undertaken post-planning and covered by a suitably worded condition.

6.8 Arboricultural

- 6.8.1 A tree survey in accordance with BS 5837:2012 was carried out by Enzygo Ltd. in December 2023, recording eleven mature trees in the South and Southeast of the site, including sycamore, pine, and Norway maple. Four trees are of high value, four of moderate value and two of low value. One tree is unsuitable for retention.
- 6.8.2 The trees are not protected by Tree Preservation Order and do not lie within a Conservation Area.
- 6.8.3 The site benefits from existing screening of mature trees and hedgerows along the northern and eastern boundaries, and a bund along the southern boundary. No trees or hedgerows are to be removed. The trees on the boundaries of the site will not be impacted and will be protected, including physical protection throughout the construction phase.

6.9 Archaeology and Cultural Heritage

- 6.9.1 A Historic Environment Assessment has been submitted in support of the application, prepared by TJC Heritage Ltd.
- 6.9.2 The site does not contain any known heritage assets and the potential for buried remains of archaeological interest to be present is limited. The present character of the site makes a negative contribution to the character of nearby heritages assets, including the designated Bedhampton Conservation Area.
- 6.9.3 The proposed development will reduce the scale of the existing bundled material and introducing a new area of energy infrastructure, expanding on a character already presented by the nearby solar farm. Although, this use is likely to be at odds with the valued characteristics of the Conservation Area, in not being rural use, it is not deemed to be any more harmful than the present use and is therefore considered to conserve the character of the area.
- 6.9.4 The scheme is considered to have limited potential to impact upon buried remains of archaeological interest owing to existing recent ground disturbances. The scheme will have a neutral effect on the setting of Bedhampton Waterworks, a non-designated 19th century industrial building of moderate heritage significance.

- 6.9.5 The submitted Heritage Statement and Impact Assessment demonstrates the scheme to have a neutral effect on the historic environment and is therefore in accordance with national and local planning policy. Nevertheless, any minimal impact would be outweighed by the significant benefits of the development delivering battery storage to help meet the UK Government's target of Zero Carbon by 2050.

6.10 Landscape

- 6.10.1 A Landscape and Visual Impact Assessment (LVIA) has been provided to undertake a full assessment of the potential landscape and visual effects of a proposed development upon the receiving landscape. The assessment has been conducted in line with published best practice guidelines and includes a desk study (local plan policies, published landscape character assessment and production of a computer-generated Zone of Theoretical visibility) and onsite observations. The site and its surrounding landscape were visited and assessed during February 2023 and again in January 2024.
- 6.10.2 The proposed development site lies within the existing Portsmouth Water Bedhampton WTW, which includes the existing and functional pumping station buildings and ground mounted solar arrays located to the northeast of the site.
- 6.10.3 Buildings associated with the water treatment works are located to the immediate north, alongside ground mounted solar panels. The northern boundary is adjacent to an internal road and features an intermittent hedgerow.
- 6.10.4 The nearest dwellings to the proposed site are located approximately 40m to the north off King's Croft Lane, beyond the heavily trafficked Bedhampton railway line. The northern site boundary features mature vegetation located on an embankment which offers natural screening to the site from the residential dwellings.
- 6.10.5 The Bedhampton railway line lies beyond the site to the north and benefits from mature tree and hedgerow screening. The JDP Havant pipe supplier's storage yard is located to the east and the Hermitage Stream runs adjacent to the southern site boundary.
- 6.10.6 The adjacent ground mounted solar farm and pipe business have landscape screening and provide a site context of sitting within a mixed-use landscape.
- 6.10.7 The site is low lying, and flat in nature, where minor undulations in the landform create effective visual screening.
- 6.10.8 It is considered the proposed development can be accommodated within the local landscape and the impact will be at worst moderate adverse. Where landscape and visual impacts are identified, they will be suitably mitigated through a robust landscaping plan, in line with national policy.
- 6.10.9 The LVIA concludes that the location is considered to have capacity to accommodate the proposed development with limited adverse effects on the landscape and visual amenity of the area.
- 6.10.10 Whilst there would be some long-term residual visual effects as a result of the development affecting receptors in the area, these effects would be localised and typically relate to views from public roads and from residential properties. There would be effects on views from the local PRow network although this would be minimal as the nearest paths are some distance away and are typically well screened.

6.10.11 The introduction of new trees, hedgerow, and wildflower meadow as proposed is considered to be of benefit to the local landscape. New trees and hedgerows are typical characteristics and will further enclose views/provide screening toward the development.

6.10.12 The site shall benefit from a 3.5m tall acoustic fence which surrounds the battery infrastructure. The location of the fence is presented on drawing DACI-4402-E08.

6.10.13 Aspects of the development which have been incorporated with the aim of limiting landscape and visual effects include:

- Retention of existing trees / hedgerows/ earth bund;
- Native trees and shrubs to be planted between the perimeter fence and the application boundary at the western boundary; and
- Utilisation of species rich wildflower seed mix within the site boundary.

7 CONCLUSION

- 7.1.1 This Planning Statement produced by Enzygo Ltd supports the application by E101 HUB4 LTD to develop and operate a 150MWh battery storage facility on land at Portsmouth Water Bedhampton Water Treatment Works, Meyrick Road, Havant, PO9 3HB.
- 7.1.2 This Planning Statement confirms that the proposed development is consistent with existing planning policy guidance at national and local levels, which supports the transition to a decarbonised UK energy sector through the creation of additional balancing capacity.
- 7.1.3 The temporary and fully reversible nature of the development, together with the proposed mitigation measures will enhance and encourage the ecological diversity of the site and will ensure that in the long term the site can not only be restored to its current use but shall also be enhanced.
- 7.1.4 As this Planning Statement has demonstrated, the proposed energy storage facility would not create any material detrimental impacts in respect to drainage and flood risk, land contamination, heritage, noise, landscape, ecology, traffic, air pollution, or local residential amenity, and is located on an available, underutilised parcel of land with a viable point of connection with both import and export capacity.
- 7.1.5 All relevant planning policy and other material considerations have been considered and it is concluded that the proposed development in the identified location is entirely appropriate and suitable, is considered sustainable development and as such, planning permission should be approved without delay.



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