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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010**

Planning Application Reference:	APP/25/00351
Proposal:	Planning application for a battery energy storage system on land at Portsmouth Water Bedhampton Water Treatment Works, Meyrick Road, Havant PO9 3HB.
Location:	Land at Bedhampton Pumping Station, Meyrick Road, Havant
Date:	03 October 2025

Portsmouth Water have reviewed the letter provided by Enzygo dated 29th August 2025 and have the following comments.

Design and Access

Our previous comments on the Design and Access Statement have been duly addressed. We accept that 'closure' and 'surrender' of the environmental permits are outside of this application and the responsibility of Portsmouth Water to undertake 'closure' and 'surrender' of the environmental permits in accordance with the Environmental Permitting regime.

Though, the report states that *"landfill material shall be removed to create a level site for the construction of the BESS. The proposed bund to the southern boundary of the site shall remain."*

This bund is likely to either be a new bund or made from the existing landfill material. If from the existing landfill material, Portsmouth Water will work with the Environment Agency to understand what permitting requirement will be required for this.

Drainage Strategy

With regards to the proposed interceptors that could be incorporated along the road network, we can explore this option further, along with review of the maintenance and management plan, once a detailed surface water drainage strategy is submitted, in accordance with the surface water drainage condition.

The following previous comment has not been addressed; however, we are happy this can be resolved through an appropriately worded planning condition.

A Battery Energy Storage development doesn't currently fit into the categories to include with the Simple Index Approach tool. Therefore, it is recommended that as part of the overall surface water management plan, water quality sampling is undertaken post development to determine whether, over a period of time, the proposed "bioretention system" is adequate, or whether additional pollution prevention and mitigation measures will be required.

The proposed bioretention system and gravel attenuation system will require further information. Again, we are happy to address this through a planning condition.

In our previous response we stated the following:

"However, we note though that the report doesn't include whether water will be specifically used to manage a fire risk. It only states that "it is anticipated the BESS shall have access to a hydrant to provide a minimum of 1,900 litres per minute for 2 hours".

"Section 6, Site Drainage of Flood Risk Assessment & Drainage Strategy includes details of Firewater Considerations (6.8). It states that the site will be lined but does not provide details of the lining or construction and it also states that the site will provide water tanks holding 228,000 litres of water on site to provide a minimum of 1,900 litres per minute for 2 hours".

"We assume, though it doesn't state, that the tanks together with the potential access to a hydrant would therefore provide double the amount of water for fire management. Clarification is required".

"The report does not provide any information or calculations on whether the "lined" site will be able to hold any of the firewater. The only calculations provided is based on rainfall and greenfield runoff rates. Clarification is required".

"Clarification of the potential volumes of water used to control thermal runaway fires is required. Without containment and attenuation, highly contaminated fire water could overflow, enter groundwater and the hermitage stream resulting in contamination of Langstone Harbour and groundwater at Bedhampton Springs used for public water supply. No indication of whether an active pumping system to remove firewater during or after a fire event has been considered".

Clarification of the above five paragraphs has not been provided in the latest response. We still require this information to support the planning application approval.

The latest response from Enzygo states that: *“Fire Water shall be managed via a ‘sealed system’ approach, such that potentially contaminated runoff can be stored onsite through the use of an impermeable below ground tank to which any contaminated water from a fire incident would be directed using a penstock valve.”* Portsmouth water supports this concept.

However, the response also goes on to state; *“Beyond the designed storage, additional capacity would be provided by the pipe network, chambers, and void space in the gravel sub-base and surrounding units before overtopping and uncontrolled overland flow would occur.”*

Uncontrolled overtopping and uncontrolled overland flow of the surface water drainage system cannot be allowed. The risk in this case to the Bedhampton Springs; Portsmouth Water’s major public water supply source is unacceptable.

The drainage strategy design and the design of the containment system for operation of the site must be capable of retaining emergency firewater within the sealed system. Liquids to be removed when the capacity is near to full. A detailed response plan needs to be developed and agreed for this to be in place prior to development.

Though earlier in the letter it states that *“The onsite attenuation has been designed to accommodate the additional firewater storage. Potentially contaminated water will be tankered away for disposal”*.

This statement contradicts itself with the above previous responses. In addition to this, no supporting detailed design or calculations have been provided.

We agree that firewater should be tankered/recirculated away for disposal/treatment by a licensed operator, or after testing released in a controlled manner from the attenuation system in the river (via an environmental permit).

Geo-environmental

The latest response states that:

“Furthermore, the net groundwater flow is upwards from the underlying chalk Principal Aquifer. Should any contamination present within the existing made ground or introduced as a consequence of site development or fire within the operational BESS, the risks of impact will be reduced to an acceptable level through the requirements of the Construction Environmental Management Plan and BESS mitigation measures. These would broadly include the following (as indicated in the HRA report):”

Portsmouth Water doesn’t agree with the above statement. This is because, with the springs, spring water collection and operation of the site is complex and doesn’t necessarily afford protection from just upward flow of spring groundwater.

However, the following measures proposed are acceptable, as a minimum, to mitigate against construction and operational risks.

- Use of construction activities and design to prevent contamination and impact to surface water, groundwater (including the chalk Principal Aquifer).

- Monitoring and containment systems during the operation of the BESS (HVAC, fire suppression, containerization of BESS and watertight bunding for each, including segregation of surface water).
- Drainage strategy to retain emergency response firewater within a sealed system

BESS Fire Test

We support the use of “LFP battery technology” and the “intelligent liquid cooled temperature control method”.

Conclusions

Whilst the latest response provides some additional information and assurances for water quality protection, there is still some detailed fundamental information missing. This is essential to address risks from the development and operation of the site. We require this before we are able to consider removing our objection and recommend planning conditions.

Kind Regards,

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