

PLANNING POLICY CONSULTATION RESPONSE

Application No:	APP/25/00351
Site Address:	Land at Bedhampton Pumping Station, Meyrick Road
Development:	Battery Energy Storage System
Case Officer:	LW
Comments by:	JB
Date of Comments:	17 October 2025

Policy comments were provided on 29 May 2025. Amongst other things, these highlighted that a sequential test for flood risk was required. A sequential test from Enzygo Environmental Consultants dated September 2025 has now been submitted. Policy comments are updated in this regard below.

Flood Risk Sequential Test

The applicant's sequential test sets out clearly the site requirements for the proposed battery storage facility. These have defined the search parameters for alternative sites at lower risk of flooding, and the alternative sites considered are clearly documented in the report. The applicant concludes that there are no suitable alternative sites at lower risk and that the sequential test is therefore passed. This conclusion is accepted given the specialist type of development proposed here.

Exception Test

Despite the document indicating that it includes a section covering the Exception Test, in fact this section appears to be missing from the submission. However, the concluding chapter of the document summarises the findings of the test. It is accepted that given the need to move to renewable sources of energy the proposal provides notable sustainability benefits, addressing part a) of the test.

It remains, then for part b) of the test to be addressed – demonstrating that the development will be safe for its lifetime. In this context it is noted that the Environment Agency had objected to an earlier FRA on the grounds that it did not adequately assess the flood risks posed by the development. The Planning Policy Team defers to the views of the Environment Agency with regard to the safety of the development.

Once the EA are satisfied that the development is safe, it may be considered that the exception test is passed.