

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

Our ref: HA/2025/126780/02-L01
Your ref: APP/25/00351

Date: 12 November 2025

Dear Planning Officer,

**PLANNING APPLICATION FOR A BATTERY ENERGY STORAGE SYSTEM ON
LAND AT PORTSMOUTH WATER BEDHAMPTON WATER TREATMENT WORKS.**

BEDHAMPTON PUMPING STATION, MEYRICK ROAD, HAVANT, PO9 3HB.

Thank you for consulting the Environment Agency on the above application.

We have reviewed the additional information submitted and set out our and comments below.

Environment Agency position

We **maintain our objection** to the above application in the absence of an acceptable flood risk assessment (FRA) and recommend that planning permission is refused.

Reason(s)

The submitted FRA (2116961-Application Documents-FLOOD RISK ASSESSMENT 5.0 - 6.9 and 2116967-Application Documents-FLOOD RISK ASSESSMENT 7 - RESULTS SUMMARY AND DRAWINGS) dated August 2025) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist.

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

- demonstrate that the development is 'safe'
- consider whether flood risk will be increased in the surrounding area
- Flood risk mitigation measures to address flood risk for the lifetime of the development have not been included within the design. Consequently, the

development proposes inadequate:

- Freeboard allowances (for battery storage, buildings and associated equipment)
- Flood storage compensation assessment

Overcoming our objection

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

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

Advice to Applicant

We are maintaining our objection due to the vulnerability classification of the proposed Battery Energy Storage System (BESS) development and the associated flood risk to the site, which has increased.

The proposed development is considered essential infrastructure, as it will be connected to the national grid. The applicant states within their planning statement that, *'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.'* According to our guidance, proposed BESS developments which are considered essential infrastructure, must be safe and appropriately flood resistant and resilient, and must be designed and constructed to remain safe and operational during flood events.

This requires all operational equipment to remain dry, which means locating it above the estimated design fluvial flood level, with appropriate allowances for climate change and an additional freeboard for uncertainty.

As stated in our previous response, the fluvial flood extents have increased because of the recent national model updates (NAFRA2), published on the 25th of March 2025. The NAFRA2 model indicates that the site is now at higher risk from fluvial flooding and is no longer considered negligible.

Therefore, we are not satisfied with the applicant's submission, as it does not consider the impact of fluvial flood risk to the site, demonstrate that the development will be kept safe and operational for the lifetime of the development (75 years), and does not assess whether third parties will be impacted by the displacement of fluvial flood water.

Therefore, we request that the applicant conducts a revised site-specific flood risk assessment for the proposed development, including an up-to-date assessment of fluvial flood risk and how they will mitigate impacts to the development and third parties.

Product 4 information

We recommend that the applicant applies for Product 4 information from the Environment Agency and use this information to inform a revised site-specific flood risk assessment for the proposed development.

This FRA requires Product 4 information to indicate future flood levels for flood zones 2 and 3 for this site. Please contact SSDEnquiries@environment-agency.gov.uk (including a site map and grid reference) to obtain a Product 4 for your development.

The applicant should indicate points on a detailed map where you require flood data.

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

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

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

Freeboard allowance

We request that the applicant identifies the future design fluvial flood level including climate change for the lifetime of the development (75 years) and identify an appropriate freeboard allowance. The applicant should also produce supporting design plans.

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

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

Floodplain storage compensation

We require the applicant to complete a flood storage compensation assessment. To enable us to assess the impact to the flood plain, the applicant should demonstrate that any increase in built footprint within Flood Zone 3 (including climate change) can be directly compensated for.

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

Advice to Local Planning Authority

We have reviewed Portsmouth Water's latest response to the Enzygo letter (16/10/2025) regarding the protection of the groundwater.

We would agree with Portsmouth Waters Catchment team, that uncontrolled overtopping of surface water drainage could pose a risk which must not be allowed to happen.

We would also agree with Portsmouth Water's assessment regarding the complexities of the springs flows and emergence. It is an oversimplification to say that protection will be afforded due to up upward flow from the underlying aquifer, and any localised flow immediately around the springs would not necessarily afford protection.

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

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Yours faithfully

Victoria Hindmarsh
Planning Advisor

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