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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:	Bedhampton Pumping Station, Meyrick Road, Havant
Date:	09/06/2026

Thank you for consulting Portsmouth Water on the above application. We have reviewed the response sent to us by Enzygo dated 14th May 2026 and have the following comments.

Site Setting

The site is located in Source Protection Zone One (SPZ1) situated directly upon the Bedhampton Springs and in close proximity to the collection chambers for Portsmouth Water's largest supply source. The Havant and Bedhampton Springs supplies water to approximately 250,000 people, including the city of Portsmouth and the surrounding area. The Springs are also a strategic source for the Havant Thicket Reservoir Project and water resources for the wider South East region.

The groundwater environment at this location is of the highest sensitivity. A groundwater pollution event at this location could impact, to such an extent that the Bedhampton springs will become unusable. This will have a significant impact to the supply of drinking water. Consequently, all measures to prevent pollution both during and post construction are required in order to safeguard this potable water supply.

Portsmouth Water's Position

Thank you for providing the consultation dated 20th May 2026. We have reviewed the letter from Enzygo dated 14th May 2026 and we are now in a position to **remove our holding objection**. We have set out the reasons below and recommending planning conditions alongside further commentary.

Conditions

Design and Construction Method Statement (DCMS)

Condition

No development shall take place until a Design and Construction Method Statement, along with the supporting documentation and plans, associated with a Project Management Plan, has been submitted to and approved, in writing, by the local planning authority in consultation with Portsmouth Water.

The Design and Construction Method Statement should include the following;

- *Construction details of impermeable containment systems, including:*
 - a. *Engineered bunding beneath and surrounding all BESS infrastructure;*
 - b. *Details of the high-density polyethylene (HDPE), Geosynthetic Clay liner (GCL) and/or reinforced concrete, or equivalent impermeable materials;*
 - c. *Demonstration of long-term structural integrity and impermeability and resistance to chemical and fire degradation.*
- *Construction details of the visual and noise bund to the south of the main BESS, including:*
 - a. *Aggregate type, quantity of materials;*
 - b. *Plans and drawings to show how this material will be engineered and landscaped;*
 - c. *Details of the risk of this material upon the water environment and what measures are to be taken to prevent groundwater and surface water pollution.*
- *Materials Management Plan, including those forming the visual and noise bund;*
 - a. *The source, handling, storage and placement of material;*
 - b. *Pollution prevention measures in association with the proposed visual and noise bund to the south of the main BESS installation.*

Supporting Documentation, to include the following:

- *Site-Specific Plans and Drawings to include;*
 - a. *Site Layout, including construction compound and plant location;*
 - b. *Construction phasing plan;*
 - c. *Engineered drawings and plans demonstrating the design and construction of the development;*

Reason(s): i) *The site construction is proposed to be a fully engineered contained system that prevents any pollution to groundwater and surface water. The above details are required to show that in the event of a fire, contaminated fire water is prevented from entering the ground and water environment.*

The development shall be carried out in accordance with the approved details.

Construction and Environmental Management Plan (CEMP)

Condition:

No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Reason(s) *Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the public water supply source which serves approximately 250,000 people including the city of Portsmouth and the surrounding area.*

Land Contamination

Condition:

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - *To ensure that risks from land contamination to drinking water supplies are remediated.*

Construction Coordination and Interface Management

Condition:

Prior to the commencement of development, a Construction Coordination and Interface Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall set out how the battery storage facility will be coordinated with existing and proposed infrastructure, operational assets, and other nearby developments, including those under the control of Portsmouth Water. The Plan shall include a process for identifying and resolving any conflicts. The development shall thereafter be carried out in accordance with the details approved under this condition.

Reason: *To ensure effective coordination with surrounding infrastructure during the construction phases.*

Surface Water Drainage, Construction & Containment

Condition:

No development shall commence until a detailed Surface Water Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be designed in consultation with Portsmouth Water.

The site drainage should be engineered as a fully sealed, zero-infiltration drainage system, demonstrating that no surface water runoff, accidental spillage, or contaminated water will infiltrate into the ground at any time.

- *Details should include the following:*
 - a) *Collection, conveyance, storage and containment infrastructure for all surface water runoff; including volumes, discharge rates and outfall locations;*
 - b) *Groundwater protection and pollution prevention measures, e.g interceptors, shut-off valves, or other (pollution) control mechanisms as appropriate;*
 - c) *Details of the monitoring, inspection, management and maintenance plan to ensure system integrity over the lifetime of the development. This shall include regular inspection of impermeable linings, joints, and drainage components.*

The drainage strategy shall be implemented in full in accordance with the approved details prior to the first operation of the development and shall thereafter be retained and maintained for the lifetime of the development.

Reason(s) *The site is situated directly upon the Havant and Bedhampton Springs and in close proximity to the collection chambers for Portsmouth Water's largest supply source. The site also lies next to the Hermitage Stream. The surface water and groundwater environment is of the highest sensitivity. Consequently, all measures to prevent pollution both during and post construction are required in order to safeguard this potable water supply.*

Detailed Response Plan/Fire Response Plan

Condition:

A Battery Safety Management Plan should consider all the pollution mitigation measures to be adopted during the operational phase to include the following:

- a) *Control measures to be implemented into the site designs.*
- b) *Emergency response plan: detailing procedures for dealing with incidents such as fires, leaks, spills, to include coordination with the emergency services and specific actions to protect groundwater and surface water.*
- c) *Details of training, toolbox talks and record keeping*

Reason(s) BESS operations pose a potential fire risk from thermal runaway. A clearly defined and agreed strategy in the event of a fire is required. A fire on this site has the potential to cause significant pollution to the important receptors mentioned above.

Informatives & Recommendations

Site Access and Security arrangements

Portsmouth would wish to discuss site access and security of the whole site including the interaction between the BESS and Portsmouth Water's Water Treatment Works (WTW).

Landfill

Currently the proposed development site contains material from Portsmouth Waters inert landfill. This operation of landfilling is not currently active though two Environmental Permits for the landfilling and material recovery are currently active. It is intended that this material is removed from site before any development takes place. The developer will need to work with Portsmouth Water to understand the final landform required for the BESS development.

It is unknown whether the bund to the south will consist of material from the existing landfill, or whether this will be imported material. Further details of are required.

Mains Pipe

There is an underground mains pipe running underneath the northern fence line of the battery storage area. The foundations of the fence may hit the pipe; therefore, we wish to work with the applicant to amend the fence line plans if required

Grid Scale Battery Energy Storage (BESS) Operation and Battery Safety Management Plan

We welcome the opportunity to be consulted on the BESS management and maintenance plan once it is made available by the operator.

We previously reviewed the Outline Battery Safety Management Plan produced by Enzygo, dated March 2025 (ref. SHF.3055.001.PL.R.001.02). We wish to be consulted on the submission of the detailed, up-to-date version when it becomes available.

The BESS installation and operation should be in accordance with the Grid Scale Battery Energy Storage System planning – Guidance for Fire and Rescue Service (FRS), produced by the National Fire Chiefs Council.

Ecological and Biodiversity Net Gain comments

The current application does not include how BNG is going to be delivered on site. The applicant will need to work with the Local Authority on this matter.

The current application states that the applicant will:

- Consider enhancement works to the hermitage stream.

- Portsmouth Water are already doing this as part of their BNG plan for the Havant Thicket Reservoir Program.
- A statement regarding bat and bird boxes being installed on retained trees.
 - There are no trees with the redline boundary. Plus, Future Water (FuW) are putting up bat boxes, so we need to make sure there is no overlap. Who is going to be responsible for maintaining the boxes?

The statements about the LEMP and HMMP are currently vague and require further details.

Catchment Management Team
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