

Dear Lesley,

**APP/25/00351 | Planning Application for a Battery Energy Storage System on Land at Portsmouth Water Bedhampton Water Treatment Works, Meyrick Road, Havant, PO9 3HB | Bedhampton Pumping Station, Meyrick Road, Havant**

Thank you for consulting me on this application. Please accept my apologies for the delay.

The application is accompanied by an updated Ecological Impact Assessment (Enzygo, May 2026) and Biodiversity Net Gain Statutory Metric and Condition Assessments (Enzygo, July 2026).

The application site comprises an area of partly-vegetated earth bunds with areas of hard surfacing, neutral grassland, and dense scrub. I am content that the site is generally of limited ecological value (in terms of vegetation communities) but there is clearly potential for various protected and notable species to occur, especially nesting birds (within dense scrub) and common reptiles (within scrub/grassland areas). Standard avoidance and mitigation measures are provided, and these are acceptable. I would be happy to have these measures secured through a suitably worded condition.

Small-flowered Buttercup and Wall Bedstraw occur within this site and have been recorded immediately north of the proposed development area in 2023. There is certainly potential for both these scarce county notable species to occur more widely, especially on any sparsely vegetated soils or shorter grassland. I would simply request that the potential presence of these two species is considered when site preparation works commence. Similarly, Himalayan Balsam and Japanese Knotweed both occur locally and could feasibly turn up anywhere. Again, the potential presence of these species should be considered very carefully during any construction works and especially post-development. The presence of Butterfly-bush is noted, and this too is a species that could proliferate following ground disturbance. The outflow immediately south of the site supports an important aquatic flora including one of the last remaining populations of Opposite-leaved Pondweed in Hampshire.

Overall, I am content with the ecological information submitted. If you are minded to grant permission can I suggest that all ecological measures are secured by condition. Suggested working is as follows:

*Development shall proceed in strict accordance with the ecological avoidance, mitigation, compensation and enhancement measures as detailed in the Ecological Impact Assessment (Enzygo, May 2026) unless otherwise agreed in writing by the Local Planning Authority. Reason: to provide ecological enhancement in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

In respect to Biodiversity Net Gain, the Statutory Metric has been completed and shows that the development will achieve a net increase of 41.62% in habitat units (0.22 habitat unit uplift). There will also be a new section of native hedgerow, resulting in a 0.14 increase in hedgerow units. The previous issue around watercourse units has been resolved through discussion with the ecologist, and the latest Metric now excludes mention of watercourse units – the previous versions included watercourses in the baseline and resulted in a need for watercourse BNG units. I am content that no impacts to watercourse units will occur here.

If you are minded to grant permission, can I suggest that BNG measures are secured by condition. The deemed condition states that a Biodiversity Gain Plan be submitted to and approved by the local planning authority prior to the commencement of development.

Suggested wording is as follows:

- *Unless otherwise approved in writing by the Local Planning Authority, a Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain Statutory Metric and Condition Assessments (Enzygo, July 2026) and must include:*

*(1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;*

- (2) *the pre-development biodiversity value of the on-site habitat;*
- (3) *the post-development biodiversity value of the on-site habitat;*
- (4) *any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;*
- (5) *any biodiversity credits purchased for the development; and*
- (6) *any such other matters as the Secretary of State may by regulations specify.*

- *The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:*

- (7) *a non-technical summary;*
- (8) *the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (9) *the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (10) *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (11) *the monitoring methodology and frequency in respect of the created or enhanced habitat.*

- *Notice in writing shall be given to the Council when the:*

*(a) HMMP has been implemented; and*

*(b) habitat creation and enhancement works as set out in the HMMP have been completed.*

- *The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP.*
- *Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

*Reason: In the interest of securing and monitoring biodiversity net gain (BNG) and policies CS11, CS16 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011, the National Planning Policy Framework and Schedule 7A of the Town and Country Planning Act 1990.*

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

**Tristan Norton**

**Principal Ecologist**