



Ms Lesley Wells
Havant Borough Council
Civic Centre Road
Havant
Hampshire
PO9 2AX

Your ref

APP/25/00351

Date
13th October 2026

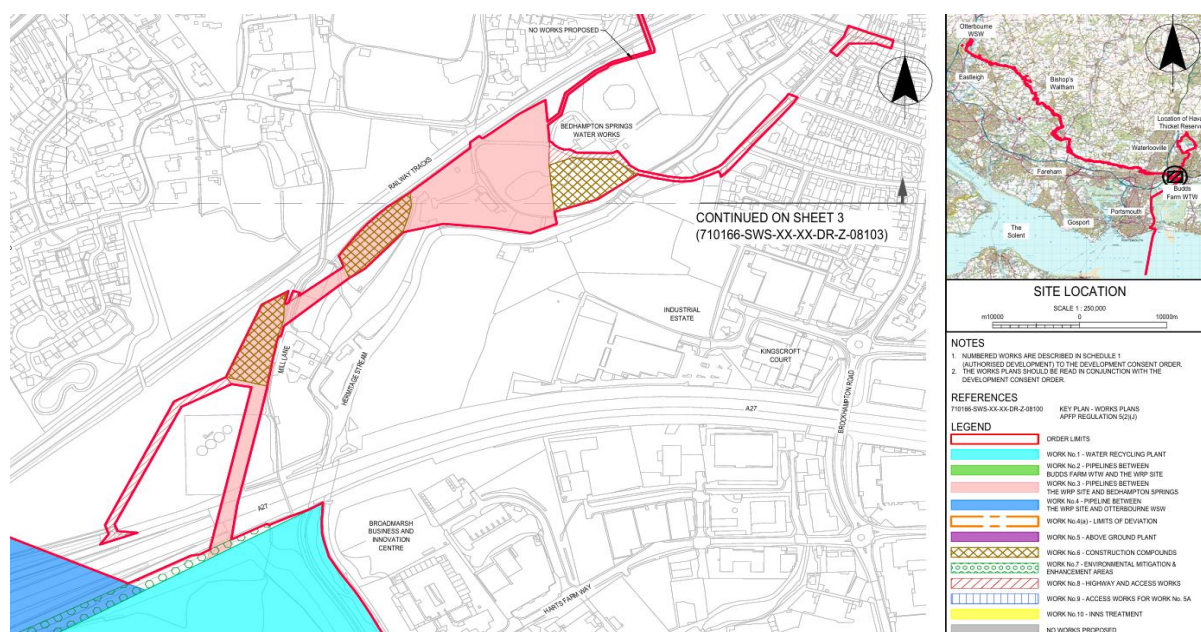
Dear Ms Wells

Planning application APP/25/00351: Battery Energy Storage System on land at Portsmouth Water, Bedhampton Water Treatment Works, Meyrick Road, Havant, PO9 3HB

Notwithstanding Southern Water's response to this application, dated 18 June 2025, this has now been further considered with regard to its potential impact on the delivery of Southern Water's Hampshire Water Transfer and Water Recycling Project (HWTWRP).

The HWTWRP was directed in 2022 by the Secretary of State as a development of national significance under section 35 of the Planning Act 2008, therefore requiring development consent. Accordingly, an application for development consent was submitted to the Planning Inspectorate in May 2026 and the examination of the application is due to start on 12th November this year. A decision from the Secretary of State is therefore due on or before 11th November 2027.

An extract of the relevant Works Plan from the application for development consent is shown below. The proposed 'order limits' for the HWTWRP in this location are shown in red. The full set of plans can be found on the Planning Inspectorate's website here [WA010002-000522-2.3 Works Plans - 2 of 3 documents.pdf](#):





The proposed battery energy storage system (BESS) falls within the proposed order limits for the HWTWRP and conflicts with the proposed location of a construction compound required to deliver the Project at this location, and potentially with the siting of the proposed pipelines across Bedhampton Springs. We were not aware of this conflict with the construction compound until March 2026, shortly before submitting our application for development consent.

In developing the HWTWRP since early 2022, significant efforts have been made to avoid and minimise conflicts with existing and forthcoming developments, such as new housing developments. This has been informed by extensive consultation and engagement, including with Portsmouth Water. Discussions are ongoing with Portsmouth Water, as owners of the land in this location, to find a resolution to this conflict and we are hopeful that in due course a mutually acceptable solution can be found. In this regard, Southern Water has urgently requested information about the BESS in order to fully understand the extent of the conflict. Unless and until a solution is found, Southern Water is required to register its objection to the application and emphasise that planning permission should not be granted for the proposed battery storage at this time.

Southern Water's position is supported by national as well as local policy. The National Planning Policy Framework (Aug 2026) makes clear that National Policy Statements may be a material consideration in preparing plans and making decisions on planning applications that fall within local authority planning regimes, for example under the Town and Country Planning Act 1990. The National Policy Statement for Water Resources Infrastructure (July 2025) (NPSWRI) encapsulates the critical need for the HWTWRP: protecting the environment while addressing the projected shortfall in water resources by ensuring water can continue to be supplied where it is needed and the social and economic benefits water supply brings. Southern Water therefore considers that the NPSWRI is a material consideration in relation to determination of this planning application.

Southern Water recognises that the battery storage proposal would provide valuable energy resilience but is not a project of national significance unlike the projects, such as the HWTWRP, reflected in the NPSWRI. It is made clear in the NPSWRI that where there is a conflict between the National Policy Statement and the development plan, the National Policy Statement prevails. The same principle applies to development subject to a planning application under the TCPA (whether or not identified in a development plan). The national importance of HWTWRP should take precedence and other development aspirations should not frustrate it.

This principle is also reflected at the local level within Policy CS19 of the Havant Borough Core Strategy (2011), which states that development will only be permitted where it safeguards the requirements of infrastructure providers, including at the Bedhampton Springs site as identified on the Havant Borough Policies Map. The national significance of the HWTWRP adds further weight to this principle that other development should not conflict with infrastructure requirements.

To reiterate, Southern Water is working closely with Portsmouth Water, which in turn is liaising closely with the battery storage applicant, to find a solution to this conflict. Until a resolution is found, Southern Water's holding objection stands.



Yours sincerely,

A handwritten signature in black ink, appearing to read "Ian Frost".

Ian Frost
Planning and Consenting Lead
HWTWRP