

Application Number: 25/10639 Full Planning Permission
Site: LAND OFF, EAST ROAD, MARCHWOOD INDUSTRIAL PARK, MARCHWOOD SO40 4BX
Development: Demolition of existing buildings and re-development of site to install a battery energy storage system (BESS) including ancillary works and access arrangements
Applicant: BW ESS Development UK Limited
Agent: Renplan Ltd
Target Date: 09/10/2025
Case Officer: Judith Garrity
Officer Recommendation: Grant Subject to Conditions
Reason for Referral to Committee: Departure from the Development Plan

1 SUMMARY OF THE MAIN ISSUES

The key issues are:

- 1) Principle of Development
- 2) Design, site layout and impact on local character and appearance of area
- 3) Landscape impact and trees
- 4) Highway safety, access and parking
- 5) Residential amenity
- 6) Ecology, On Site Biodiversity and protected species

2 SITE DESCRIPTION

The site is an allocated employment site which located within the Marchwood Industrial Park which is characterised by industrial, and employment uses. The proposals relate to a relatively large site, 3.14ha in size, which is bounded by Central Crescent to north and south. The site is currently occupied by industrial and commercial uses and structures although some of the buildings are vacant. The collection of buildings on the site are of a mixture of scales and forms along with open storage and parking areas.

The nearest residential properties are located on Byams Lane and Gardiner Close to the south of the site. On the eastern side of the site is land that appears to be within storage and distribution use, and to the west is existing energy infrastructure. To the north of East Road is the National Grid Marchwood Substation and Royal Mail Fleet depot.

3 PROPOSED DEVELOPMENT

The proposal is for a battery energy storage system (BESS) facility which would connect to the Marchwood Substation on the north side of East Road. The proposal is for a period of 40 years which represents the operational lifespan of all BESS facilities.

The development of energy storage facilities such as this allows the local grid network to operate more efficiently by taking excess energy, storing it in batteries and releasing it into the network when the grid needs it at times of peak demand. The application states that the proposed development can help in supporting the energy security of businesses and households in the New Forest.

The proposals would involve demolition of the existing buildings on the site and the installation of battery storage units and transformers, switchgear, a welfare unit, spare parts container and a project control room. All of the plant, apparatus and equipment would be raised from existing ground level by 750mm to address flood risk on the site. As a result, these structures which would be approx. 3.75 m in height, and in addition, a water tank and pump would be provided within a building of a maximum of 2.75m in height. A 400 kV substation up to 5.9 m high within a compound of 40.6 m x 54 m would be located towards the front of the site. The site would be enclosed by palisade fencing and have a gated entrance. 20 no. CCTV cameras on 4m poles would be located mainly around the perimeter of the site.

As part of this application an EIA Screening Opinion has been adopted as the proposals would fall within Schedule 2 of the EIA Regulations. The EIA Screening Opinion dated 25th July 2025 concluded that this was not an EIA development.

4 PLANNING HISTORY

Proposal	Decision Date	Decision Description	Status
21/10131 Development and setting out of four plots within Site L for the purposes of B8 open storage use; each plot will comprise of a one-storey building, car parking, cycle storage, fencing and B8 open storage space. Approval of reserved matters – layout, scale appearance and landscaping pursuant to condition 1 of Outline Planning Permission (12/99485).	05/05/2021	Granted Subject to Conditions	Decided
18/10292 Demolition of building 4G (Demolition Prior Notification Application)	22/03/2018	Details not required to be approved	Decided
13/11051 Black start facility (Lawful Development Certificate that permission is not required for proposal)	18/12/2013	Was Not Lawful	Decided
12/99485 Flexible employment uses B1(b) & (c), B2 & B8 including open storage; associated parking; landscaping on partially infilled pond (Outline Application with details only of access)	19/02/2013	Granted Subject to Conditions	Decided
11/97098 Increase height of perimeter fencing from 2.4m high to 2.8m	19/10/2011	Granted Subject to Conditions	Decided

5 PLANNING POLICY AND GUIDANCE
Local Plan 2016-2036 Part 1: Planning Strategy

Policy STR1: Achieving Sustainable Development

Policy STR3: The strategy for locating new development.

Policy ENV3: Design quality and local distinctiveness

Policy STR6: Sustainable economic growth

Policy STR7: Strategic Transport Priorities

Policy STR8: Community services, Infrastructure and facilities

Policy STR9: Development on land within a Minerals Safeguarding Area or Minerals Consultation Area

Policy ECON1: Employment land and development

Policy ECON2: Retention of employment sites and consideration of alternative uses

Policy CCC1: Safe and healthy communities

Policy CCC2: Safe and sustainable travel

Policy ENV1: Mitigating the impacts of development on International Nature Conservation sites.

Policy ENV3: Design quality and local distinctiveness

Policy ENV4: Landscape character and quality

Local Plan Part 2: Sites and Development Management 2014

DM2: Nature conservation, biodiversity and geodiversity

DM3: Mitigation of impacts on European nature conservation sites

DM4: Renewable and low carbon energy generation

DM5: Contaminated land

MAR5: Marchwood Industrial Park

Supplementary Planning Guidance and Documents

SPD - Air Quality in New Development.

SPD - Climate Change

SPD - Parking Standards

Neighbourhood Plan

N/A

National Planning Policy Framework

NPPF Ch. 6 - Building a strong, competitive economy.

NPPF Ch.10 - Supporting high quality communications.

NPPF Ch.14 - Meeting the challenge of climate change, flooding and coastal change.

NPPF Ch.15 - Conserving and enhancing the natural environment.

National Policy Statement

National Overarching National Policy Statement for Energy (EN-1)

National Policy Statement for Renewable Energy Infrastructure (EN-3)

Plan Policy Designations

Employment

Built-up Area

6 PARISH / TOWN COUNCIL COMMENTS

Marchwood Parish Council

Resolved to support the application. PAR 3

Subject to the requirements of all statutory consultees being met not limited to but including Environment Protection, Health and Safety Executive and the requirement of the Fire Service.

The site was identified as 'Brownfield' therefore already used for industrial purposes. It was noted that a 4-metre-high wall was planned with another boundary having trees planted both to protect neighbouring properties from noise.

It was thought that the proposed application would result in less heavy goods vehicles on the site compared to the existing operators.

7 COUNCILLOR COMMENTS

No comments received

8 CONSULTEE COMMENTS

Comments have been received from the following consultees:

NFDC Planning Policy:

No objection in respect of employment policy. There is a conflict with employment Policy (Policy ECON2), but there may be scope for a departure from Policy ECON2 to be justified based on the economic benefits case submitted by the applicant and the consideration of the most appropriate location for a BESS uses.

NFDC Landscape:

Reference is made to the height of the acoustic fence expressing a preference for this to be reduced to 3m. However, no objection is raised subject to a condition relating to landscape implementation.

NFDC Trees:

No Objection subject to condition relating to tree protection. New planting is proposed as part of the wider landscaping plan which will mitigate the loss of trees T13 to T16.

NFDC Conservation:

The proposed development will not impact any heritage assets.

NFDC Environmental Health (Pollution):

No Objection subject to conditions relating to hours of demolition/construction, a CEMP and erection of an acoustic fence.

NFDC Environmental Health Contaminated Land:

No Objection subject to contaminated land conditions

NFDC Ecologist:

No objection subject to the development securing the recommendation of the submitted Preliminary Ecological Appraisal.

Environment Agency:

No objection. The EA have reviewed the revised FRA Technical note that has been submitted and considered the flood risk mitigation measure proposed. The application has been treated as having a development lifespan of 50 years although it would be operational for a 40-year period and the vulnerability classification remains as essential infrastructure due to its connection to the National Grid. The proposals would only meet NPPF requirements in relation to flood risk subject to conditions relating to the implementation of flood risk mitigation in accordance with FRA, details of surface water disposal in the event of a fire and contamination.

HCC Surface Water

No objection. A FRA Technical note has been submitted. Clarification has been provided on the temporary nature of the site and the extent of likely flood risk during this period. On this basis, the information addresses previous comments.

HCC Highways:

No objection.

HCC Minerals and Waste Planning:

No objection. The requirements of Policy 26 (Safeguarding – waste infrastructure) of the adopted HMWP have been met.

Hampshire and Isle of Wight Fire and Rescue Service:

Comment and recommend a condition for the submission of a detailed Battery Safety Management Plan and Emergency Response Plan. It is noted that for BESS sites there are very few fire safety regulations that will apply once planning permission is granted and so it is therefore important to ensure all safety matters are identified and secured as part of the planning process.

Natural England:

No objection. The proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. Natural England's generic advice on other natural environment issues is referred to.

Scottish and Southern Electric:

Comment Only Scottish and Southern Electric (SSEN) have High Voltage underground cables and a substation within the application site. Cable tracing should be undertaken for safety and in line with appropriate guidance. No changes should be made to the application site that negatively affect SSEN assets, and the applicant should fully engage with SSEN on the proposal.

Archaeology:

No objection. While the absence of unknown archaeological remains cannot be stated with certainty, due to the reasonably low risk of encountering archaeology as well as prior ground disturbance on the site, it would not be reasonable or proportionate to impose archaeological conditions

Southern Water:

No objection subject to conditions.

National Grid Company:

No objection provided that the appropriate guidance is followed. The statutory clearances indicated on the attached profile drawing are maintained at all times (including during construction) and there are no conflicts with any existing deeds of easement or wayleave agreements that National Grid hold over these lines, Guidance information should be reviewed and adhered to and any further guidance for working near overhead lines should be confirmed with the asset protection team.

Marchwood Power Ltd:

Comment that a High-Pressure Gas Pipeline (Major Accident Prevention pipeline) (24" Diameter) runs directly underneath the proposed layout plan. Our asset has an Easement/Wayleave of 3m either side of the Pipeline with which no mechanical equipment is allowed within.

HSE:

Do not advise against granting planning permission. Refer to Marchwood Power Line crossing the site

9 REPRESENTATIONS RECEIVED

The following is a summary of the representations received.

Against: 3

- Noise impact due to low level humming and buzzing at night.
- Reference made to noise nuisance issues with existing SOS containers adjacent to the site.
- Dust.

For: 1

- Project will support whole community by the provision of sustainable energy.
- The proposal would have minimal negative environmental impact.

10 PLANNING ASSESSMENT

Introduction

One of the remedies to the climate crisis caused by climate emissions is to reach net zero carbon emissions as soon as possible and the Government has set very challenging targets to reach net zero. It is acknowledged by national policy that electrical storage capacity is required to support the growth of renewable energy generation to meet the Government's 2050 net zero target. The National Overarching National Policy Statement for Energy (EN-1) states that "*Storage has a key role to play in achieving net zero and providing flexibility to the energy system...*". Battery energy storage system facilities (BESS) support the provision of increased renewable energy generation nationally and assist in meeting energy security challenges.

The submitted Planning, Design and Access Statement confirms that an energy connection has been secured to the Transmission Network via the National Grid Marchwood Substation. In October 2022, the applicant signed a connection offer with the National Grid for a 200MW connection to the Marchwood 400kV transmission substation in November 2031. Due to the strategic importance of battery storage (BESS) projects for the National Grid, an opportunity later arose for connections related to BESS projects to be accelerated. Therefore, in December 2024, the offer was modified to allow for an earlier connection to be made from the application site in June 2028.

The connection would be made directly to infrastructure operated by National Grid Electricity Transmission (NGET) and does not require any connection to the distribution network, operated by SSEN. The connection would allow for both the demand and generation of up to 200MW peak electricity, with the site taking electricity from the grid when there is a surplus and transferring electricity back to the grid when demand is high. This would provide greater resilience to the transmission network, as well as allowing more efficient use of renewable sources of energy.

The proposed BESS would, according to the submission, be a critical element in developing renewable energy infrastructure and would make a significant contribution towards meeting climate change policies and to addressing energy security challenges.

Locally, NFDC declared a Climate and Nature Emergency on 11 October 2021 and the adopted Climate Change SPD (June 2024) is part of the wider set of actions by

the Council to deliver on the Declaration outlined in a Climate and Nature Emergency Action Plan. The SPD provides guidance on how developers should address climate change in planning applications, in order to meet Local Plan requirements, in particular Policies STR1 and ENV3.

Principle of Development

Policy STR1 of Local Plan Part 1 Planning Strategy related to achieving sustainable development. All new developments are expected to make a positive social, economic and environmental contribution to community and business life in the area. Most development needs should be met within settlement boundaries in a manner that is appropriate and proportionate to the nature and size of the settlement.

Policy ECON2 of the Local Plan Part 1 Planning Strategy identifies the land subject of this planning application as an employment site. This policy seeks to retain employment sites for employment uses wherever possible. The policy sets out criteria on how to assess alternative uses. These criteria include (i) where the primary purpose of the use is to provide a supporting service to businesses or the workforce in the local area; or (ii) for non-employment uses, where it is demonstrated that the employment site is no longer suitable or viable for continued employment use.

Policy MAR5 of the Local Plan Part 2 relates specifically to Marchwood Industrial Park. This policy encourages the development, redevelopment and intensification of employment uses in this area. This site-specific policy requires compliance with Policy DM12: Sites identified as particularly suitable for marine-related businesses; and retention and enhancement of existing landscape features associated with the lakes and boundaries of the site to screen development and enhance biodiversity.

Supporting paragraph 3.84 to Policy MAR5 sets out that Marchwood Industrial Park contains an energy from waste plant, a gas turbine power station and various industrial uses including extensive areas of open storage. It considered that there is scope for more efficient use of open storage areas by their replacement with built warehouse floorspace.

Policy DM4 of the Local Plan Part 2 relates to Renewable and low carbon energy generation. The policy set out that the benefits associated with development proposals relating to renewable energy schemes will be given significant weight, provided that they avoid unacceptable impacts on (i) land uses, including all nature conservation and heritage assets; (ii) the immediate and wider landscape, giving particular importance to impacts on the New Forest National Park and the Cranborne Chase and West Wiltshire Downs AONB; (iii) residential amenity and (iv) the road network.

Officers acknowledge that the applicant is seeking to provide an important piece of energy infrastructure for the region. However, a BESS facility is not a typical planning land use or type of development. As such the District Council has not planned for this type of development through a criteria based planning policy or site allocation.

Given that BESS facilities are not generally allocated in development plans, site searches for infrastructure of this sort are generally guided by the availability of large parcels of land and that this tends to lead itself to land allocated for employment development given the nature and size of the proposed buildings or areas of countryside. As set out above, this proposal is based on land in the employment allocation at Marchwood.

The proposals would result in the loss of employment land which would be contrary to Policy ECON2 and MAR5 so to be acceptable in principle a justification for a policy exception needs to be made.

An Economic Benefits Statement has been submitted in support of the planning application which sets out the economic and employment benefits of the scheme and how it would supporting local business. This applicant's case can be summarised as follows:

The proposed development can help in supporting the energy security of businesses and households in Marchwood and the New Forest. The applicant argues therefore that the proposal would comply with clause (i) of Policy ECON2 which states that the primary purpose of the use is to provide a supporting service to businesses or to the workforce in the local area.

Furthermore, there are significant and specific material considerations in the public and local community interest that weigh favourably in support of the proposed development, which would meet the requirements of paragraph 7.14 of the Local Plan. The supporting text in paragraph 7.14 states that proposals for other non-employment uses that require planning permission on existing employment sites will only be considered where the site marketing criteria in this policy have been met, unless there are other significant and specific material considerations in the public or local community interest for the alternative use in the location proposed, and these considerations outweigh the employment objectives of this policy. The Economic Benefits Statement sets out that there are *“significant and specific material considerations in the public or local community interest for the alternative use”* that relate to locational requirements, demonstrable public benefit, positive effects on combating of climate change and delivering energy resilience.

The applicant's summary of the positive economic impacts of the development are set out below:

- The development could create up to 272 temporary jobs on-site and in the economy.
- .The gross value added (GVA) during the construction phase could be up to £24.5 million.
- A possible spend of up to £1.8 million by construction workers in local businesses.
 - Once operational, the use will support up to five full-time equivalent jobs (FTE) in New Forest and the wider economy.
 - The GVA associated with these 5 jobs is estimated to be £8.5million (present value).

The Proposed Development can also help in supporting the energy security of the 9,040 businesses and 77,566 households in New Forest.

The supporting text to Policy ECON2 sets out at a paragraph 7.13 that certain types of alternative use are acceptable on employment sites without needing to meet the requirements of criterion (ii). Such uses can help to make business sites more attractive to incoming firms and can improve the quality of the working environment for employees. Such supporting services may include crèche facilities, training,

meetings space and conference facilities, restaurants cafes, recreation and sports facilities, and medical facilities.

The policy test to be applied is whether the primary purpose of an alternative use is to provide a supporting service to businesses or to the workforce in the locality, rather than servicing general demand or passing trade. BESS is not considered to be a supporting use in the terms referred to in para 7.13 and is it not similar in nature to any of the supporting uses listed. Whilst it is accepted that this list of uses is not exhaustive, the proposed BESS use is a significantly different type of use compared to the examples of supporting uses given in the supporting text. Therefore, a judgement needs to be made as to whether the primary purpose of this use is to supporting existing businesses/workforce in the locality, - where for planning policy purposes "the locality" would be considered to be within Marchwood - or whether it is in fact to service a more general wider demand.

As the planning application submission states that the proposed development can also help in supporting the energy security of businesses and households in the wider New Forest which suggests that the proposed development is intended to service a more general wider demand than the locality and consequently the proposed development would not comply with Policy ECON2 criteria (i).

There will however be some economic benefits of the proposed development which would appear to partly offset the loss of employment land. In addition to these economic benefits, in more general terms consideration must be given to where an appropriate location is for a BESS use to be sited. Given its nature, it would seem more probable that an industrial area would be a more appropriate locations for such a use to go and in this case the close proximity of the site to Marchwood Power Substation is a critical factor in site selection.

Consideration needs to be made as to whether the benefits of the scheme outweigh the identified conflict with Policies ECON2 and MAR5. The NFDC planning policy consultation does not raise an objection in respect of the conflict between the proposals and the adopted employment policy for the site. However, justification for any departure is a matter of planning judgement.

In making this judgment, the wider national policy context is important. The principle of the proposed development is strongly supported and encouraged by national policy in the NPPF 2024. NPPF Chapter 6. 'Building a strong, competitive economy' Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity.

NPPF Chapter 14 relates to "Meeting the challenge of climate change, flooding and coastal change" and is particularly relevant to renewable energy proposals. Paragraph 161 encourages the increased use and supply of renewable and low carbon energy. The Framework sets out that the planning system should support the transition to net zero by 2050 and that it should support renewable and low carbon energy schemes and their associated infrastructure.

Paragraph 166 states that in determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Paragraph 168 states that, when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, applicants are not required to demonstrate the overall need for renewable or low carbon energy. Significant weight should be given to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

Furthermore, the National Policy Statement for Energy (EN-1) states, that electricity "*Storage has a key role to play in achieving net zero and providing flexibility to the energy system...*" (Paragraph 3.3.25), and, "*Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher*" (Paragraph 3.3.26).

The Clean Power 2030 Action Plan (CP30AP): "A new era of clean electricity" was published by the Department for Energy Security and Net Zero (DESNZ) on 13th December 2024. The CP30AP states that the Government is '*accepting government's central role in steering the creation of this new energy system, setting our expectations for the 2030 capacities of key technologies at national and regional level.*'

This Action Plan sets out that successful delivery will require rapid deployment of new clean energy capacity across the whole of the UK, reflecting the shared renewable ambitions of the UK, Scottish and Welsh Governments. These factors are acknowledged to have significant weight.

The emphasis in the NPPF and National Policy statements is clear in its ambition and strongly encourages the delivery of this type of infrastructure and acknowledges the positive benefits associated with renewable energy generation and the key role played by battery storage facilities in providing flexibility in the energy. The planning assessment of the current proposals needs to be made within this clear national policy context.

Overall, a balanced view has been taken within the local and national policy context that is set out above. National policy strongly encourages low carbon energy projects in meeting climate change challenges and striving to achieve carbon Net Zero by 2050. Whilst the current proposals would not accord with local policy, the submitted Economic Benefits Statement provides justification for the use and the selection of the application site, and this has been carefully assessed. On balance, based on these factors a policy exception can be justified in this instance and as such it is concluded that the proposed BESS development is acceptable subject to the consideration of other material considerations as discussed below.

Design, site layout and impact on local character and appearance of area

Policy ENV3 of the Local Plan states that development should contribute positively to local distinctiveness, quality of life and enhance the character and identity of the locality by creating buildings, streets, places and spaces that are functional, appropriate in appearance and attractive. New development should be accessible for those with different needs with realistic levels of car parking, and attractive and appropriate green spaces.

The proposal relates to a large site within the Marchwood Industrial Park which is characterised by industrial, and employment uses. It is noted that the site and access to it are on private land and so are not publicly accessible. The site is occupied by a collection of buildings of a mixture of scales and forms along with open storage and parking areas.

The proposed battery storage containers and other associated infrastructure would be relatively low-level structures - although they would be raised from existing ground levels by 750 mm to take account of 200-year flood levels- their overall height would be 3.75m. However, the new sub-station would have a larger scale and a functional appearance and be up to a maximum height of 5.9m. The substation would be located towards the front of the site but set back from East Road by 12 m behind existing trees thereby reducing its visual impact on the street scene. The battery compound would be enclosed by a 2.4m high palisade fence and gates at the front and south-east side. In addition, there would be 20 no. CCTV cameras on 4m poles mainly around the site perimeter. There would be associated visual enhancements proposed in the form of tree planting and landscaping. Overall, the development would be visually appropriate within the context of the existing industrial park, particularly given the presence of Marchwood electricity substation opposite the site. Due to the scale and form of the proposals together with the associated landscaping and tree planting the extent of the potential impact would be limited to the site and its immediate surroundings. As such, when considered in the context of the existing buildings on the site and the wider locality, the visual impact of proposals would be acceptable and comply with Policy ENV3.

Landscape impact and trees

Policy ENV4 of the Local Plan Part 1 relates to landscape character and quality and requires development to retain and/or enhance landscape features through sensitive design, mitigation and enhancement measures.

Site specific Policy MAR5 of the Local Plan Part 2 require new development to retain and enhance existing landscape features.

A Landscape Visual Impact Assessment (LVIA), landscape masterplan and arboricultural assessment have been submitted with the application. NFDC Landscape and Tree Officers have been consulted on the planning application. The LVIA concludes that subject to the implementation of the landscape masterplan to deliver mitigation and enhancements, the proposals would result in beneficial effects to the landscape character and visual amenity of the area once the landscaping is established and mature.

The proposal is on a previously developed site which is well contained within the industrial park and currently has a particular utilitarian character. The southern boundary of the site adjoins existing residential development and so has a higher sensitivity than elsewhere, but the proposals seek to mitigate the impacts of the development through the use of additional native planting which will eventually provide a suitable buffer.

The location of the proposed acoustic fence to the southern edge of the sealed surfaces is appropriate. This fence would be 4.5 m high and so could have some visual impact. The NFDC Landscape Officer would prefer this fence to be reduced to 3.0 m in height as this would enable the visual buffer to the fence structure that the planting mitigation would provide to be effective more quickly. Whilst this comment is noted the fence is set well back within the site so it would not be dominant within the street scene and is located a minimum of 70 m from the nearest residential boundary to the south of the site. As such, although the screening effect of the landscaping would take longer to establish, the short term impact of the acoustic fence would not be unacceptable or over dominant within its context. Furthermore, a 4.5m fence is required for noise mitigation purposes as set out in the Noise Impact Assessment. As such, no landscape objection is raised subject to a condition relating to landscape implementation.

The application is supported by a detailed Arboricultural Impact Assessment which includes a BS5837 tree schedule which identifies a total of 16 trees on the site. Seven of these trees are classified as category B moderate quality trees, the remaining 9 are category C low quality trees.

Due to the location and context of the site it has little wider public amenity in respect to the trees. The proposals would result in the loss of four semi-mature roadside ash trees on the East Road to facilitate the development and maintain the required 10m separation from apparatus. Unfortunately, it would not be possible to replace these trees due to the National Fire Chief Councils guidance on Grid Scale BESS Schemes.

However, 6 existing trees would be retained to the East Road frontage. Native hedge planting would be undertaken to East Road and Central Crescent (western limb of access), and 20 new standard trees are proposed to the south of the proposed acoustic fence towards the rear of the site. Native tree and shrub mix, and wildflower meadows areas are also proposed and would replace the existing open storage and industrial buildings that are in this location.

The NFDC Tree Officer agrees with the assessment of these trees and that they are largely category C or at the lower end of category B. Their loss will be noticeable in the immediate vicinity, but they are of limited wider amenity.

Despite the tree loss, new planting is proposed as shown on the submitted landscaping masterplan which would deliver enhancement and strengthen screening of the site from the dwellings and open space of Gardiner Close to the south. Overall, it is considered that the proposed landscaping and additional tree planting would mitigate for the loss of the four trees as the remaining trees on the site will be retained and protected. As such there is no tree objection subject to a tree protection planning condition.

As such the proposals are considered to be acceptable and would comply with Policies ENV3 and ENV4 of the Local Plan Part 1 and Policy MAR5 of the Local Plan Part 2 with respect to landscaping and trees impacts and are considered to enhance the existing landscape features of the site.

Highway safety, access and parking

Policy CCC2 of the Local Plan seeks to provide sufficient car and cycle parking for developments. Policy ENV3 seeks to create streets and spaces that are safe and easy to navigate and to ensure that sufficient parking is provided without detriment to the character of the area or highway safety.

A Transport Assessment and a Construction Traffic Management Plan have been submitted with the planning application and HCC Highways have been consulted. The site would utilise 3 accesses to the site - 2 from East Road and one from Central Crescent (eastern access limb). One new access would be created from East Road to allow existing businesses to continue to use Central Crescent. No highway objection is raised to this.

The proposal would generate traffic movements during the 20-week demolition period and 55-week construction period. A Construction Traffic Management Plan has been submitted which sets out HGV and construction vehicle routing. The CTMP confirms that HGV routing will use the primary and strategic road network and not local routes through the centre of Marchwood.

The CTMP concludes that subject to a series of site and transport management measures including routing for HGVs the relatively short-term construction traffic management impacts are acceptable. This conclusion is agreed with HCC Highways and no further planning conditions are necessary in this respect. Parking is a matter for consideration by the Local Planning Authority to ensure that the proposed parking complies with NFDC Parking Standards SPD. During the demolition and construction phase on-site parking provision for HGV and contractors will be provided within the proposed construction compound. This parking can be secured through compliance with the CTMP.

Once the BESS facility is operational, it will be remotely monitored and only require occasional maintenance visits of approximately 2 a week on average. As such, there would be a negligible impact on the transport network, particularly considering the traffic generation from existing uses of the site.

No dedicated parking provision is made on site once the facility is in operation, but the limited parking required during maintenance visits can easily be accommodated within the site on access tracks between the batteries. Therefore, no parking issues are raised.

As such, there are no highway safety concerns or parking issues relating to the proposed development subject to the demolition and construction works being undertaken in accordance with the submitted CTMP. The proposals are therefore considered to be acceptable and would comply with Policies ENV3 and CCC2 of the Local Plan Part 1.

Residential amenity

Policy ENV3 of the NFDC Local Plan Part 1 requires the impact on the residential amenity of existing and future occupiers to be taken into consideration in making planning decisions. NPPF Paragraph 135, subparagraph (f) states development should promote health and wellbeing, with a high standard of amenity for existing and future users.

Although the site is located within the Marchwood Industrial Park, residential properties are located on Gardiner Close and Byams Lane to the rear (south-west) of the site. The nearest dwelling is 30m from the red line boundary and 70m from the proposed built form.

The main environmental impact of the development would be potential noise and dust during the demolition and construction phases. There would be a 20-week demolition phase and 55-week construction phase. A demolition environmental management plan has been submitted with the planning application that sets out

how the demolition and construction would be undertaken. The NFDC Environmental Health (pollution) have been consulted on the planning application. Potential impacts arising from the demolition of existing buildings on the development site and construction of the battery energy storage scheme are of potential concern. Demolition Environmental Management Plan (DEMP) and Construction Traffic Management Plan (CTMP) have been submitted. The DEMP specifies the standard working hours would be between 08:00 – 18:00 Monday to Friday with generally, no works on Saturdays, Sundays and Bank Holidays. A review of these documents by EHO highlights that the proposed DEMP is acceptable, however, the CTMP provides insufficient information in relation to the control of construction impacts, including hours of work. Therefore, a site-specific Construction Environmental Management Plan (CEMP) is requested and should be secured by a planning condition.

During the operational phase, the proposed development will generate some noise through the use mechanical ventilation equipment to cool the infrastructure. A Noise Impact Assessment (NIA) has been submitted with the planning application which includes a review the existing background sound levels. The NIA has appropriately considered the impact in accordance with relevant acoustic standards for commercial sound sources as well as low frequency noise capable of being generated from the proposed plant and equipment. It is noted that the assessment considers a worst-case scenario. The noise impact at the most sensitive receptor both during the daytime and at night is predicted to be at or below existing background sound levels, accordingly the risk of adverse impact is considered to be low. Furthermore, low frequency noise has been assessed and is predicted to significantly fall below the appropriate low frequency noise level and so is not expected to be an issue.

However, in order to achieve compliance with the above sound levels, it is noted that mitigation through careful design of the plant and equipment is necessary which included low noise inverters and cooling systems, a low noise emissions transformer and the erection of a 4.5 m acoustic fence at the south boundary of the battery storage area on the site.

The NIA assessment identifies that with mitigation in place the proposed development will not give rise to noise levels that exceed the measured background sound level in the area during the day and night-time period, which is indicative of a 'Low Impact'. Consequently, the assessment demonstrates that the proposed development will give rise to noise impacts that would be within the range accepted in recognised guidance.

Planning conditions are however recommended to ensure the noise rating level for plant and equipment does not exceed the determined pre-existing background sound level specified within the submitted NIA either during the day or at night. A condition is also required to ensure any acoustic barrier installed achieves the necessary noise reduction criteria as outlined within the NIA and is thereafter retained and maintained.

No objections are therefore raised subject to conditions relating noise levels in compliance with the NIA, compliance with the DEMP, the erection of an acoustic barrier, and a CEMP.

Due to the nature of the proposed development, it would not result in any privacy impact or odour generation.

Third party representations have raised concerns about noise but given the NIA assessment, the provision of an acoustic barrier and controls over hours of

construction and demolition, this impact would be adequately mitigated so as not to harm residential amenity, particularly given the existing industrial use of the site. Issues relating to existing noise emissions from the land occupied by SOS Containers is not related to this planning application. Overall, given the above assessment, and subject to the mitigation measures identified, the impact of the proposed development on residential amenity would be acceptable and comply with Policy ENV3 of the Local Plan Part 1.

Ecology On Site Biodiversity and protected species

Policy DM2 of the Local Plan Part Two seeks to conserve nature and enhance biodiversity and states that the Council will use planning conditions to provide mitigation and where appropriate, enhancement measures.

The Solent and Dorset Coast SPA is located approx. 320m to the north and 170m to the north-east of the site; The Solent and Southampton Water RAMSAR, Solent Marine SAC and Eling and Bury Marshes SSSI are located approx. 620m to the north-east of the site. These designated sites all cover Southampton water and its associated tidal mudflats and creeks to the north of the site. They are designated for supporting breeding and wintering bird populations such as waders, geese, and terns.

Natural England have been consulted on the planning application and consider that the proposed development will not have significant adverse impacts on statutory protected nature conservation sites or landscapes. No objection is raised but reference is made to Natural England's generic advice on other natural environment issues.

The planning application is accompanied by a Preliminary Ecological Assessment (PEA) which considers the potential impacts of the proposals and associated mitigation has been put forward. The PEA concludes that there is no requirement for any further protected species surveys and suggests precautionary mitigation during the demolition and construction phases. Additional tree and landscape planting is proposed, which will deliver a biodiversity net gain in habitat areas and hedgerow units on the site. Ecological enhancements have been recommended to include the provision of 2 no. bat and 2 no. bird boxes/bricks/tubes in mature trees within the site. There would also be provision of invertebrate shelters across new natural habitats throughout the site for a wide range of species. These enhancements can be secured for installation and retention by planning condition. The NFDC Ecologist raises no objections subject to securing the recommendations of the submitted PEA.

With respect to biodiversity net gain, the effect of Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:(a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan in writing, unless it is an exempted development.

This is a major scheme and as such 10% BNG is required to be achieved as part of the development proposals. A BNG metric report and assessment have also been submitted in support of the application. The NFDC Ecologist has been consulted and considers the BNG documents to be acceptable in respect of this matter. Overall, the proposed development would comply with Policy DM2 by ensuring the protection ecological species within the site, provides appropriate ecology enhancements and delivering mandatory 10% BNG

Drainage and Flood Risk

Local Plan Policy CCC1 (Safe and Healthy Communities) criterion (iv)(b) sets out that in the interests of public safety, vulnerable developments will not be permitted in areas at risk of flooding unless in accordance with the sequential and exception tests. The NPPF (December 2024) paragraphs 170 to 182 and Annex 3 (Flood risk vulnerability classification) sets out national guidance on planning and flood risk.

Flood Risk:

The site is mostly located in Environment Agency (EA) Flood Risk Zone (FRZ) 1 but parts of it are located in EA FRZ 2 (Rivers and Seas) and the NFSFRA fluvial and coastal which is an area at a medium risk of flooding. However, the proposals are classified as essential infrastructure in Annex 3 of the NPPF and is a type of use that can be acceptable in FRZ 2.

A Flood Risk Assessment and sequential test has been submitted with the planning application and the Environment Agency have been consulted. The EA raised initial objections to the adequacy of the FRA. The FRA failed to demonstrate that the development can remain operational and safe in times of flood; it also failed to consider whether flood risk would be increased in the surrounding area; or consider the requirement for flood emergency planning as access to the site is required to allow a response to any issues which may be caused or exacerbated by flooding. In addition, flood risk mitigation measures to address flood risk for the lifetime of the development are required. In this respect, the FRA proposed inadequate raised finished floor levels; flood storage compensation assessment; lack of adequate rescue or evacuation arrangements or details of an emergency response plan. A subsequent FRA technical note has been submitted to address these concerns. The Environment Agency (EA) has been reconsulted and has now no objection subject to conditions.

The EA has reviewed the revised FRA submitted and considered the flood risk mitigation measures proposed. The application has been treated as having a development lifespan of 50 years although it is proposed for a 40-year period. The vulnerability classification remains as essential infrastructure due to its connection to the National Grid. The EA's conclusion is that proposals would only meet NPPF requirements in relation to flood risk subject to conditions relating implementation of flood risk mitigation in accordance with FRA, and further details of contamination investigation and remediation.

Furthermore, as the site is located on a secondary aquifer and in a sensitive area for surface water groundwater there are requirements for the submission of details of the measures to contain any potentially polluted water in the unlikely event there were a fire. As such, a planning condition is recommended.

The EA comment on the proposals to shorten the lifetime of the proposed development from the usual 75 years to 50 years as it corresponds to the lease and the lifespan of the battery storage equipment. The appropriateness of this timespan is for the LPA to determine. It is also for the LPA to determine if this development could be classified as a 'less vulnerable use' instead of 'essential infrastructure'. The case officer has considered these points and confirmed to the applicant that the shortened lifetime of the proposal development is acceptable and can be controlled by a temporary 40-year planning condition. It has also been confirmed to the applicant that the vulnerability of the proposals are classified as 'essential infrastructure' due to their connection to the National Grid. This classification is consistent with how the EA have considered the proposals.

The FRA Technical Note proposes two mitigation options to ensure that the development will remain safe and operational for the lifetime of the development. The applicant has subsequently confirmed that Option 1 will be adopted. This mitigation would raise the on-site controls and critical infrastructures elements of the facility to 600mm above the 200-year flood level in 50 years' time. As such, the infrastructure should remain dry in a flood event. However, the remainder of the site area which would be below the flood level could experience some flooding of between 250mm – 850mm. The agent has confirmed that, as the critical infrastructure would be raised above flood levels, the site would remain safe and operational if there was a flood event. On this basis the Council is satisfied with the adequacy of the flood resilience and resistance measures proposed Paragraph 181 (e) of the NPPF requires that *“safe access and escape routes are included where appropriate, as part of an agreed emergency plan”*. Determination is therefore required of whether a development is safe and the ability of users to safely access and exit the site during a flood and evacuate before an extreme flood event. An Emergency Plan should be provided as part of the FRA or as a separate document and should demonstrate that there is safe access and escape routes where evacuation due to a flood event required, and that people would not be exposed to hazardous flooding of any source including an extreme flood event. Guidance on Emergency Plans for flooding is set out in *“Flood risk emergency plans for new development” (ADEPT/EA dated September 2019)*. This guidance includes details of what emergency plans need to demonstrate and how to consider emergency plans for flooding as part of the planning process. In all circumstances warning and emergency response is fundamental to managing flood risk. One of the key considerations is whether adequate flood warnings would be available. The EA do not comment on the adequacy of rescue or evacuation arrangements or the details and adequacy of a flood emergency response plan as these do not fall within their direct remit or expertise. Nevertheless, these are important considerations for managing flood risk for this development. It is noted that the EAs initial comments were that the whilst the proposed evacuation route would be within Flood Risk Zone 1, all routes from the site are impacted by either tidal or fluvial flooding. Furthermore, whilst the BESS facility would usually be unmanned, free and voluntary movement during the design flood event is important to allow in person access to respond to any issues that may be caused or exacerbated by flooding. It is therefore recommended that consideration is given as the adequacy of rescue or evacuation arrangements, and the details and adequacy of an emergency plan. The revised FRA (V P05) considers the requirement for flood emergency planning (Sections 6.1, 6.2 and 6.3) and to demonstrate that the development can remain operational and safe in times of flood. Implementing an emergency response plan is a key factor to the mitigation of the effects and managing the risks of a flood event. Access to the site is important to ensure an appropriate response can be made to any issues which may be caused or exacerbated by a flooding event. The relevant section of the FRA covers preventative measures, flood warning measures and responsive measures that are proposed for the flood emergency plan. The equipment specification will be designed such that it is resistant to the 1 in 200-year tidal flood event.

During the construction phase materials, equipment and site services would be located in Flood Zone 1. Once the BESS is operational, the site will be remotely managed and there will be no permanent staff on the site. There would only be occasional maintenance required one or twice a week. It is therefore highly unlikely that staff presence on the site would occur at the same time as a flood event, as maintenance can be re-scheduled if a flood warning is in place. Access to the site is important to ensure an appropriate response can be made to any issues which may be caused or exacerbated by a flooding event.

The revised FRA sets out that the emergency response plan would outline the procedures to follow in flood events, including protocols, evacuation procedures, and damage assessment. The site will register for the EA flood warning service and follow any identified HCC flood emergency management procedures.

The emergency response plan would be constantly updated when new equipment is installed, or operational changes occur. This measure would ensure that the site and its users remain safe through flood events. The main focus of the emergency plan would be to enable advance warning to ensure there are no personnel on site during a flood event. This can be easily achieved on this site with the Environment Agency Flood Warning System for the area, whereby tidal flooding is predictable in advance and flood warning systems can predict fluvial flooding.

Surface water flooding is less predictable, but it is primarily linked to heavy rainfall therefore any local weather warnings would provide advance notice of this type of flooding.

If flood water is present on the site, construction and maintenance operations would be avoided. A suitable risk assessment would undertake to assess whether it is safe to access the site during a flood event.

A backup power source would be provided on the site and situated above flood waters levels (1 in 200-year tidal climate change flood) and be able to power emergency provisions.

The emergency planning and rescue implications of the proposed development have been considered in accordance with the relevant advice and the NPPF. It is therefore not considered necessary to consult with HCC Emergency Planning in this instance. Due to the nature of the proposed use the provisions which would be included in the emergency response plan are considered to be acceptable. Full details of the emergency response plan can be secured by a planning condition.

Drainage:

The site is connected to mains foul drainage connections, and drainage will be fitted with silt traps to prevent silts / demolition materials entering drains. Water runoff from dust suppression measures used during demolition and construction will be discharged through the existing surface water system. The demolition works would be undertaken in accordance with Environment Agency Guidance for Pollution Prevention 5 – Works and Maintenance in or near Watercourses.

The site already has existing surface water drainage connections which are anticipated to offer a connection for the outfall of the proposed surface water drainage strategy. There are not considered to be significant drainage or pollution impacts.

HCC Lead Local Flood Authority have been consulted on the planning application. In their initial response they requested clarification on how the runoff has been calculated as this could lead to increased flows from the site. Further details of the current surface water regime and brownfield discharge rates are required to be considered. Concerns were expressed about the drainage features to the south of the site which are a risk of fluvial flooding, and this requires a more detail assessment. In addition, an assessment of water quality requirements should be undertaken in accordance with the SuDs manual along with the submission of maintenance information for the conveyance trenches and flow control elements. A FRA technical note has been submitted, and HCC LLFA have been reconsulted. This additional information confirms that the site would be operational for a 40 year period. On the basis of the temporary nature of the use and the extent of likely flood

risk during this period the previous comments have been addressed, and HCC do not raise objection to this application.

Overall, the revised, FRA Technical note and Drainage Strategy demonstrate that the development would not lead to increased flooding. The site can be safely managed in a flood event and suitable drainage arrangements can be made. As such it would accord with Local Plan Policy CCC1 criterion (iv)(b), and guidance set out in NPPF (December 2024) paragraphs 170 to 182 and Annex 3 (Flood risk vulnerability classification) sets out national guidance on planning and flood risk.

Contaminated Land:

Local Plan Policy DM5 sets out that where development is proposed on a site that is known or suspected to be contaminated, a detailed site assessment will be required to establish the nature and extent of the contamination.

Inappropriate management of contamination may have a significant impact for the environment and human health and, therefore, must be managed appropriately. NFDC Environmental Health (contaminated land) has been consulted and comment that the site has been previously developed, and a land contamination Phase 1 report needs to establish the baseline likelihood of the site containing contamination based on historical uses and potentially known sources of contamination. A Preliminary Risk Assessment should determine the level of risk for the proposed development on human health and the environment in order to determine whether further intrusive investigation is required.

A Phase 1 Land Quality report has been submitted with the planning application. This document sets out that the proposal will monitor for evidence of unsuspected contamination throughout the demolition works. If potential contamination is encountered no further works will be undertaken until an assessment of the contamination risks have been undertaken and any remedial actions agreed. The EA have also requested conditions on contamination investigation and remediation reports given the potential impact on groundwater and due to the location of the site on a secondary aquifer with sensitive surface water in close vicinity. These requirements have been amalgamated into the conditions recommended by EHO. Subject to standard conditions relating to contaminated land no objection is raised, and the proposal would comply with Policy CCC1 of Local Plan Part 1 and Policy DM5 of Local Plan Part 2.

Health and Safety Matters

HSE gas pipelines:

The site is located within the Inner, Middle and outer zone of the Gas HSE Consultation Zone for Marchwood Power and the Medium Pressure consultation Zone for SGN MP consultations. Policy CCC1 (iii) requires that development within the safeguarding area of a military explosives storage area or within the consultation zones of a hazardous industrial site or pipelines will be restricted or managed either in accordance with Health and Safety Executive (HSE) guidelines, or in consultation with the Secretary of State for Defence, as applicable.

Appropriate consultations have been undertaken as part of the planning application process. The HSE do not advise on safety grounds against granting planning permission in this case.

A 24" diameter, high pressure gas pipeline has been identified within the site boundary and there is a 3m easement required on either side of this pipeline. The

applicant has actively engaged with Marchwood Power Ltd to discuss the site who have confirmed the location of the pipeline and easement. The applicant has shown the pipeline and easement on the site layout plan. The layout of the site has been designed to ensure works and equipment remain outside of the pipeline easement area. Vehicle crossings of the pipeline will be required to access the site, but these will be in line with existing vehicular movements on East Road and Central Crescent.

The interaction between the pipeline and the cable connecting the BESS site to the National Grid substation will be discussed further between these parties to ensure the design meets with Marchwood Power's approval. The final cable route design will remain within the red line of the planning application but may need to move slightly to ensure any crossings meet with Marchwood Power's approval. However, the potential slight change to the location of this underground pipe is not material to the determination of the planning application and can be finalised once planning permission has been issued and all guidance and technical matters fully considered. The Applicant is aware of the SSE cables located underneath the application site and they have been engaging with SSE regarding these cables for some time. Both parties are working together to ensure that the impact of any proposed works on these cables can be mitigated appropriately. If the proposal is approved, the applicant will continue to work with SSE to avoid, relocate or remove the cabling, to meet SSE's requirements.

Subject to compliance with various regulations and easements around the pipelines and cables, there are no concerns about the development in this respect.

Fire Safety:

Hampshire & Isle of Wight Fire and Rescue Service (HIWFRS) commented that for BESS sites there are very few fire safety regulations that apply to the site once planning permission is granted. It is therefore important to ensure all safety matters are identified and secured as part of the planning process. Initial consultation comments requested further information and clarification relating Water Supplies and Management; Spacing and Separation; Active Fire Protection Systems; Battery Chemistry and Details of testing. The agent has responded with further information and clarification on these matters. Reference made to the submitted Fire Strategy Plan and Outline Battery Safety Management Plan and revised FRA. Further comments from HIWFRS confirm that water supplies and management have been addressed. In relation to the spacing of the containers, it is recommended that further justification is provided to ensure there is no potential for fire to spread between units. However, this can be secured by a planning condition requiring a detailed Battery Safety Management Plan and Emergency Response Plan and so HIWFRS have no further comment to make at this stage.

Mineral Safeguarding

Policy SRT9 of Local Plan Part 1 relates to development on land within a Mineral Safeguarding Area or Minerals Consultation Area. This policy required that viable mineral resources should not needlessly be sterilised by development. Developments in these areas should be phased around the appropriate prior extraction of minerals.

The proposed development lies within the mineral and waste consultation area (MWCA) – Sites section. It lies within the buffer zone of safeguarded sites Unit 2C North Road, Marchwood operated by Biffa Waste Services and Marchwood Energy Recovery Facility operated by Veolia ES UK.

This area is informed by the safeguarded sites list as defined through Policy 26: Safeguarding – waste infrastructure of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP). The purpose of this policy is to protect current and potential waste sites from pressures to be replaced by other forms of development, including through ‘encroachment’ where nearby land-uses impact their ability to continue operating.

In order to discharge the requirements of the safeguarding policy, HCC would expect to see how nearby safeguarded sites are considered, how operator comments were taken into account and what impacts that had on the proposed development design. The applicant has confirmed that other safeguarded operators (Veola and Biffa Waste Services) have been consulted and have not raised objections to the proposed development.

In the light of this HCC Minerals have no objection to the proposed development. Mitigation is not required as the requirements of Policy 26 (Safeguarding – waste infrastructure) of the adopted HMWP have been met.

Community engagement

NPPF Para 42 emphasises the importance of engaging with the local community, stakeholders and statutory and non-statutory consultees before submitting a planning application.

NFDC published a revised Statement of Community Involvement (SCI) on 24th February 2024. This SCI sets out how NFDC involve the community and stakeholders in the preparation and review of planning policy documents and the consideration of planning applications.

A Statement of Community Involvement (SCI) has been submitted which provides details of how the applicant has engaged with the local community prior to submission of the planning application, details of the outcomes of the consultations and how the proposed development has been influenced through this feedback. A drop-in public exhibition event for local residents, businesses and other stakeholders was held on 25th June 2025 and a dedicated project website was set up to provide information and updates. Public consultation was undertaken with letters sent to 415 local residents informing them of the proposals and inviting them to the exhibition.

The SCI confirms that 18 people attended the public exhibition event. Of those attending, 1 left a feedback form on the day of the event and there were a few further responses submitted via the website. The majority of attendees were supportive of the proposals and recognised that the proposed development was needed for the green energy transition, and they considered that the site was appropriately located on brownfield industrial land. Some comments were raised about health and safety and traffic movements. The SCI includes responses to the comments raised relating to the construction traffic and access, noise, fire, and the construction timeline.

The Applicant arranged briefing meetings with stakeholders, including elected members at Marchwood Parish Council and members for Marchwood and Eling ward. In addition, HCC Councillor representing Totton South and Marchwood Division, the Leader of NFDC, Cabinet Members for Planning Economy and Environment and Substantiality and the local MP. Some of these stakeholders attended the public exhibition event.

No further community meetings have been arranged but the applicant has continued to consult interested parties, including local residents and stakeholders throughout the planning application process. Furthermore, BESS have undertaken to make a monetary contribution to a local community fund which will be managed by a third party which will provide support for community projects for the lifetime of the project.

The above measures demonstrate the appropriate stakeholders, and the local community engagement has been undertaken prior to the submission of the planning application in accordance with the NFDC SCI and the NPPF.

Developer Contributions

N/A

11 OTHER MATTERS

None

12 CONCLUSION / PLANNING BALANCE

In accordance with the National Overarching National Policy Statement for Energy, the NPPF and the NFDC Climate Change SPD significant weight that must be placed on the need for proposals that reduce carbon emissions and strive to achieve carbon net zero by 2050.

The development of renewable energy projects and battery storage facilities in particular are strongly supported and encouraged by NPPF and other national policy documents which emphasise the benefits of BESS proposals to meeting wider climate change objectives. It is recognised in these policies that battery storage has a key role to play in achieving net zero and providing flexibility to the energy system. Battery energy storage system facilities (BESS) support the provision of increased renewable energy generation nationally and assist in meeting energy security challenges.

The Economic Benefits Statement sets out the case for the proposals, the site selection process and the benefits of the proposals within the national policy context set against the loss of employment land that would result. Consideration needs to be given as to whether the benefits of the scheme outweigh the identified conflict with Policy ECON2. The NFDC policy team does not raise an objection in respect of employment policy. However, justification for any departure is a matter of planning judgement based on the planning balance.

Taking all of these material considerations, the planning judgement concludes that when carefully balancing the issues a departure from local plan policy can be justified in this instance and as such the principle of the development is accepted. It has been demonstrated following assessment of the planning application and the various supporting documents submitted that the proposal are acceptable in planning terms. The visual impact of the development would be acceptable when considered within the context of the industrial character of the site and associated tree planning and landscaping which would be beneficial to public amenity.

Furthermore, ecological enhancement can be secured along with BNG. Associated dust and noise, primarily during the demolition and construction periods, can be mitigated and impact on adjoining residential amenity can be effectively mitigated through these measures and secured by planning conditions.

Flooding and drainage impacts have been considered and subject to the FRA and drainage strategy being implemented would not result in additional risks during the 40-year lifetime of the development. Highway safety would not be prejudiced by the proposed development and all other health and safety issues have been addressed.

As such, the application is recommended for approval subject to conditions.

13 RECOMMENDATION

Grant Subject to Conditions

Proposed Conditions:

1. **Time:**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. **Time:**

The use shall cease within 40 years from the date of first operation of the development hereby permitted and the land restored to a condition which has first been agreed in writing by the Local Planning Authority. Written confirmation of the first import of electricity date shall be provided to the Local Planning Authority within one month after the event. At least 6 months before the planning permission is due to expire for the temporary elements, a Decommissioning Method Statement (to include a timetable for implementation and a scheme to restore the land to its former cleared condition) and a Decommissioning Landscape Plan shall be submitted to and approved in writing by the Local Planning Authority. The temporary elements shall then be removed and the ground reinstated in accordance with the Decommissioning Method Statement and Decommissioning Landscape Plan.

Reason: Because of the temporary nature of the development and in order to safeguard the amenities of the area and make the site available for an employment use in accordance with Policies ENV3 and ECON 2 of the Local Plan Part 1 for the New Forest outside of the National Park.

3. **Approved plans:**

The development permitted shall be carried out in accordance with the following approved plans:

BWE001-PL-03 REV01	PROPOSED SITE LAYOUT PLAN
BWE001-EL-01 REV06 OF 2	CONTEXTUAL ELEVATIONS SHEET 1
BWE001-EL-02 REV05 OF 2	CONTEXTUAL ELEVATIONS SHEET 2
BWE001-FS-01 REV02	FIRE STRATEGY PLAN
BWE001-PL-00 REV06	EXISTING SITE LAYOUT PLAN
BWE001-PL-01 REV10	PROPOSED SITE LAYOUT PLAN
BWE001-PL-02 REV09	PROPOSED BESS SITE LAYOUT PLAN
BWE001-SD-01 REV01	400KV SUB STATION
BWE001-SD-02 REV02	BATTERY UNIT
BWE001-SD-03 REV02	PCS TRANSFORMER
BWE001-SD-04 REV02	LV AUX TRANSFORMER
BWE001-SD-05 REV02	40FT WELFARE CONTAINER
BWE001-SD-06 REV02	40FT SPARE PARTS CONTAINER
BWE001-SD-07 REV02	2.4M PALISADE FENCE AND GATE
BWE001-SD-08 REV01	CONTROL ROOM
BWE001-SD-09 REV01	WATER TANK AND PUMP
BWE001-SD-10 REV01	CCTV CAMERA
BWE001-SD-11 REV01	WATER HYDRANT
BWE001-SD-12 REV01	TRACK
BWE001-SD-14 REV04	NOISE BARRIER
BWE001-SP-01 REV07	SITE LOCATION PLAN
111501 Rev D	PLANTING PLAN

DEMOLITION ENVIRONMENTAL MANAGEMENT PLAN ABP dated June 2025 VER 1

ECONOMIC BENEFITS STATEMENT - Pegasus Group Dated May 2025
Ref P25-0102_R001v3_AH_RC

LANDSCAPE AND VISUAL IMPACT APPRAISAL - Redbay design Dated
October 2025 Final V4

AIR QUALITY ASSESSMENT - Kairus Ltd May 2025 Ref 24-2156

ARBORICULTURAL IMPACT ASSESSMENT - Barton Hyett Associates
reference 6781 dated July 2025

BIODIVERSITY NET GAIN STRATEGY

CONSTRUCTION TRAFFIC MANAGEMENT PLAN - Miles White Transport
dated July 2025 Ref 24073 Issue 4

FLOOD RISK ASSESSMENT AND SURFACE WATER STRATEGY
J-15750-NUK-XX-XX-RP-Z-1-S2-P 5

FLOOD RISK ASSESSMENT TECHNICAL NOTE (Amber Planning) dated
25/09/2025

FLOOD RISK SEQUENTIAL TEST

HISTORIC ENVIRONMENT DESK BASED ASSESSMENT Landgage
Heritage Ref PR0275

NOISE IMPACT ASSESSMENT 24-394 200MW Ver 8 - dated 1 October
2025

OUTLINE BATTERY SAFETY MANAGEMENT PLAN Abbott Risk
Consulting Ltd Issue 2 July 2025 Issue 2 ARC-1275-005-R1

PHASE 1 LAND QUALITY Ground Investigation Limited - Report No. P1984 Rev 2
PLANNING DESIGN AND ACCESS STATEMENT - Renplan Planning consultants dated 11th July 2025 Ver 2
PRELIMINARY ECOLOGICAL APPRAISAL - Western Ecology Ref WOR/5018 dated July 2025
STATUTORY BIODIVERSITY METRIC CALCULATION
TRANSPORT STATEMENT - Miles White Transport dated July 2025 Ref 24073 Issue 4

Reason: To ensure satisfactory provision of the development.

4. Landscape implementation:

All external works (hard and soft landscape) shall be carried out in accordance with the approved planting plan ref 111501 Rev D prior to the first operation of the use or in the first planting and seeding season following the first operation of the use hereby approved and maintained thereafter as built and subject to changes or additions only if and as agreed in writing with the Local Planning Authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size or species.

Reason: To ensure the achievement and long term retention of an appropriate quality of development and to comply with Policies ENV3 and ENV4 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside of the National Park.

5. Tree Protection:

The works hereby approved shall be undertaken in full accordance with the provisions and tree protection measures erected as set out within the Arboricultural impact Assessment prepared by Barton Hyett Associates reference 6781 dated July 2025 and tree protection plan BHA_6781_02 Rev A.

Reason: To ensure the retention and protection of existing trees and natural features and avoidance of damage during the construction phase in accordance with Policies ENV3 and ENV4 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside of the National Park.

6. Noise Levels:

The rating level of noise emitted from fixed plant and equipment associated with the development shall not exceed the background sound levels (both during the day and at night) specified in Table 13 and 14 of the Noise Impact Assessment (NIA) prepared by InAcoustic (project ref: 24-394) Rev 8 dated 01 October 2025. The assessment of noise levels shall be carried out in accordance with the methodology set out in BS 4142:2014 "Methods for rating and assessing industrial and commercial sound" and its subsequent amendments.

Reason: In the interest of amenity and in accordance with Policy ENV3 of the Local Plan Part 1 for the New Forest outside of the National Park.

7. Erection of Acoustic Barrier:

The approved acoustic barrier shall be erected and installed prior to first operation of the development hereby approved and thereafter be retained and maintained in accordance with the approved details for the lifetime of the development. The approved acoustic barrier shall be designed, located, and constructed in full accordance with the specifications set out in Appendix D of the Noise Impact Assessment prepared by In Acoustic (Project Ref: 24-394), Rev 8 dated 01 October 2025.

Reason: In the interest of residential amenity to mitigate noise impacts and in accordance with Policy ENV3 of the Local Plan Part 1 for the New Forest outside of the National Park.

8. Construction Environmental Management Plan (CEMP):

Notwithstanding the submitted CEMP, no development shall take place, including any works of demolition, until a further site specific Construction Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- An indicative programme for carrying out of the works;
- Details of the arrangements for public engagement / consultation both prior to and continued liaison during the construction works;
- Hours of construction work;
- Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s);
- Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination;
- The parking of vehicles of site operatives and visitors;
- Loading and unloading of plant and materials, including permitted times for deliveries;
- Storage of plant and materials used in constructing the development;
- The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulations Orders);
- Measures to control the emission of dust and dirt during construction;
- A scheme for recycling / disposing of waste resulting from demolition and construction works i.e. no burning permitted.

The approved details shall be implemented before the development hereby permitted is commenced and retained throughout the duration of construction. The development shall only be carried out in accordance with the CEMP so approved.

Reason: In order that the Local Planning Authority can properly consider the effect of the works on residential amenity [and highway safety] and in accordance with Policy ENV3 of the Local Plan Part 1 Planning Strategy.

9. **Demolition Environmental Management Plan (DEMP):**

The development hereby permitted shall be carried out in full accordance with the Demolition Environmental Management Plan (DEMP) prepared by Associated British ports (ABP). The approved DEMP shall be adhered to throughout the demolition period.

Reason: In order that the Local Planning Authority can mitigate the effect of the works on residential amenity and in accordance with Policy ENV3 of the Local Plan Part 1 Planning Strategy for the New Forest outside of the National Park.

10. **Contaminated land - Investigation and risk assessment:**

No development other than that required to be carried out as part of an approved scheme of remediation must not commence until an investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings following the principles of the Environment Agency's Land Contamination: Risk Management (LCRM) shall be submitted to and approval in writing of the Local Planning Authority. The report of the findings must include:

(i) a site investigation scheme to include a survey of the extent, scale and nature of contamination, based on the submitted Phase 1 assessment (*Phase 1 Assessment of Land Quality, Ground Investigation Limited P1984.1.1 July 2025*) to provide information for the detailed assessment of the risk to all receptors that may be affected including those off-site;

(ii) The results of the site investigation and the detailed risk assessment referred to in (i) of the potential risks to:

- human health,
- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) An options appraisal and remediation scheme based on (i) and (ii) giving full details of the remediation measures required and how they are to be undertaken.

(iv) An appraisal of the remedial options providing details of the data that will be collected in order to demonstrate that the works set out in (iii) are complete and identification of any requirements for longer term monitoring of pollutant linkages, and maintenance arrangements for contingency action.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. The site is located on a secondary aquifer with sensitive surface water in the close vicinity; previous uses of the site include potential highly contaminated activities and to ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by unacceptable levels of water pollution. In accordance with Policy CCC1 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside of the National Park and Policy DM5 of the Local Plan for the New Forest District outside the National Park. (Part 2: Sites and Development Management) and NPPF paragraph 196.

11. Contaminated land - remediation scheme:

Where contamination has been identified, a detailed remediation scheme to deal with the risks associated with contamination of the site in respect of the development hereby permitted to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, has been submitted to and approved in writing of the Local Planning Authority.

The approved scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 (as amended) in relation to the intended use of the land after remediation.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CCC1 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside the National Park and Policy DM5 of the Local Plan for the New Forest District outside the National Park. (Part 2: Sites and Development Management) and NPPF Paragraph 196.

12. Contaminated land - implementation of remediation scheme and verification plan:

Where a remediation scheme has been approved in accordance with condition 11, the approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in

the approved remediation scheme and prior to the works approved by this development being brought into use, a verification report that demonstrates the completion of the would set out in the approved remediation scheme and the effectiveness of the remediation carried out must be produced, and shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification report to demonstrate that the site remediation criteria have been met

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, and to ensure that the site does not pose any further risk to human health or the water environment by demonstration that the requirements of the approved verification report have been met and that the remediation of the site is complete. In accordance with Policy CCC1 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside the National Park and Policy DM5 of the Local Plan for the New Forest District outside the National Park. (Part 2: Sites and Development Management) and NPPF Paragraph 196

13. Contaminated land - report unexpected contamination:

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. No further development shall be carried out in the affected area until an investigation risk assessment is undertaken in accordance with the requirements of condition 10, and where remediation is necessary a remediation scheme must be prepared detailing how the contamination will be dealt with in accordance with the requirements of condition, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. And to ensure that the development does not contribute to and is not put at unacceptable risk from, or is adversely affected by unacceptable levels of water pollution from previously unidentified contamination sources in accordance with Policy CCC1 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside the National Park and Policy DM5 of the Local Plan for the New Forest District outside the National Park. (Part 2: Sites and Development Management) and NPPF paragraph 196.

14. **Pollution Protection from Fire Water Run off:**

The development shall not commence until a scheme for the disposal of surface water in the event of a fire including details of how firewater used during fire suppression would be contained on site or drained safely away from the designated site, has been submitted to and approved in writing by the Local Planning Authority. The scheme so approved shall be implemented prior to first operation of the use hereby permitted and thereafter retained.

Reason: In the event of a fire highly polluting chemicals in batteries could enter groundwater in firewater or rainfall. Groundwater is particularly sensitive in this location because the development is located in a secondary aquifer, with sensitive surface water receptors in close vicinity. To ensure that adequate pollution prevention measures and appropriate mitigation is in place to provide the containment of water in the event of a fire and to prevent unacceptable risks to groundwater, in accordance with Policy CCC1 of the Local Plan Part 1 Planning Strategy for the New Forest outside of the National Park and Paragraph 187 of the NPPF.

15. **Battery Safety Management Plan and Emergency Response Plan:**

Prior to commencement of the development of the battery storage facility a detailed Battery Safety Management Plan (BSMP) and Emergency Response Plan (ERP) shall be submitted to and approved in writing by the Local Planning Authority.

These details shall include the following :

- i) Fire safety measures for emergency personnel attending a fire incident, such as deflagration vents (including installation of an audible fire alarm on the site);
- ii) A comprehensive review of the space between units in line with the UL9540A testing information to establish whether there is potential for fire to spread between units;
- iii) A review of the detailed battery safety management plan and any associated fire safety systems;
- iv) Details of the proposed battery chemistry;
- v) A Emergency Response Plan in the event of a flooding on the site.

The proposals must be implemented in accordance with the approved details and thereafter retained as such.

Reason: To protect adjoining land and habitats from increased fire risk associated with the proposed development and ensure an Emergency Response Plan is secured in accordance with Policy CCC1 of the Local Plan Part 1 Planning Strategy for the New Forest outside of the National Park and NPPF para 181 (c)

16. **Ecology assessment and ecological enhancements:**

The works hereby approved shall be undertaken in strict accordance with the approved Preliminary Ecological Assessment (PEA) prepared by Western Ecology dated July 2025. The ecological enhancements set out in Section 7 of the approved PEA report shall be installed prior to the first

operation of the battery energy storage use hereby permitted and thereafter retained in perpetuity.

Reason: To safeguard protected species and ensure delivery of appropriate enhancements in accordance with Policies ENV3, ENV4 of the Local Plan 2016-2036 Part One: Planning Strategy for the New Forest District outside the National Park and Policies DM1, DM2 and DW-E12 of the Local Plan for the New Forest District outside the National Park (Part 2: Sites and Development Management).

17. Flood Risk:

The development shall be carried out in accordance the submitted flood risk assessment (FRA ref Flood_Risk_Hydrology-6449472) dated September 2025 and the mitigation measures set out in Option 1 to raise all on site controls and critical infrastructure by 600 mm above the 200-year flood level (4.41 m above AOD) accounting to the lifetime of the development. These approved mitigation measures shall be implemented in fill prior to the first operation of the approved development and subsequently in accordance with the schemes timing and phasing arrangements. The approved measures shall be retained and maintained through the lifetime of the development.

Reason: To reduced the risk of flooding of the approved development and to ensure that the use will remain safe and operational for the lifetime of the development, in accordance with Policy CCC1 of the Local Plan Part 1 for the New Forest outside of the National Park and NPPF.

Further Information:

Judith Garrity

Telephone: 023 8028 5434