

Ms Naomi Reynard
Local Planning Authority
North Herts Council
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Borehamwood
WD6 1WA

**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
Post Point CHN 215
Farnham House
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HERTFORDSHIRE, SG1 2ST
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Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 29 August 2025

Dear Ms Reynard

RE: 25/01349/FP - Installation and operation of a battery energy storage system (BESS) facility incorporating batteries, transformers, inverters, switch rooms, substation, water tank, other associated infrastructure plus cable ducts, fencing, access track, landscaping and drainage infrastructure at Land North of Stevenage Road, Titmore Green, Little Wymondley, Hertfordshire, SG1 2JE

Thank you for your consultation on the above site, received on 10 June 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a full application for installation and operation of a battery energy storage system (BESS) facility incorporating batteries, transformers, inverters, switch rooms, substation, water tank, other associated infrastructure plus cable ducts, fencing, access track, landscaping and drainage infrastructure.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:

- The development is not in accordance with NPPF, PPG and local policies including *Policy NE8: Sustainable drainage systems (Reducing Flood Risk)*.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed.

1. There are small pockets of flooding observed near the existing pond and appropriate measures are required to be taken to avoid flooding in the site.
2. The nodes J1 to J9, PLAT01 to PLAT06 found in drainage calculations and pipe numbering required to be marked in the proposed drainage strategy drawing provided. The pipes in between the nodes J1 to J9 have oversized pipe diameter with diameter ranging from 4000 to 7000mm, further explanation for this design is required to be provided.
3. Evidence of agreement in principle from the relevant authority in relation to the proposed discharge rate and any proposed outfall structure/s discharging to the adjacent ditch is required. Evidence of third-party agreements and consents required for the drainage provision to operate as proposed that is for the discharge to the ditch at southwest.
4. Maintenance plan should also include the maintenance of the pond and who will be adopting these proposed SuDS features for the lifetime of the development.

Informative

The points given below can be conditioned once the above-mentioned points are addressed:

- Assessment of and provision for exceedance flow paths.
- A plan and supporting calculations and drawings are required to show a timeline of how any temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices.
- High level assessment of how water quantity and water quality will be managed during the construction phase is required.

Yours sincerely

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following document has been reviewed:

- Flood Risk Assessment and Surface Water Drainage Strategy, Wymondley Battery Energy Storage System - Pivoted Power LLP (part of EDF Energy Renewables Ltd), by SLR Consulting Limited, 10 April 2025, Revision: 01, Client Reference No: 08525.