



Planning Design and Access Statement

Wymondley Battery Energy Storage System

Pivoted Power LLP (part of EDF Energy Renewables Ltd)

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Basis of Report

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Acronyms and Abbreviations

AOD	Above Ordnance Datum
AIA	Arboricultural Impact Assessment
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
BSMP	Battery Safety Management Plan
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
CEMP	Construction Environmental Management Plans
CTMP	Construction Traffic Management Plan
DNO	Distribution Network Operator
EclA	Ecological Impact Assessment
EDF-R	EDF Energy Renewables Ltd
EIA	Environmental Impact Assessment
FRS	Fire and Rescue Service
FRA	Flood Risk Assessment
FES	Future Energy Scenarios
GBS	Green Belt Statement
HGV	Heavy Goods Vehicle
HEDBA	Historic Environment Desk-Based Assessment
HDD	Horizontal Directional Drilling
kV	Kilovolt
LLFA	Lead Local Flood Authority
LWS	Local Wildlife Sites
LPA	Local Planning Authorities
LVApp	Landscape and Visual Appraisal
MV	Medium Voltage
MW	Megawatt
NESO	National Energy System Operator
NFPA	National Fluid Power Association
NFCC	National Fire Chiefs Council
NPS	National Policy Statements
NIA	Noise Impact Assessment
OHL	Overhead Lines
PEA	Preliminary Ecological Appraisal
PCS	Power Conversion Systems
PDAS	Planning, Design, and Access Statement



PRoW	Public Right of Way
RIGS	Regionally Important Geological/ Geomorphological Site
SPD	Supplementary Planning Document
SuDS	Sustainable Drainage Systems
TPP	Tree Protection Plan
VSC	Very Special Circumstances
ZTV	Zone of Theoretical Visibility



1.0 Introduction

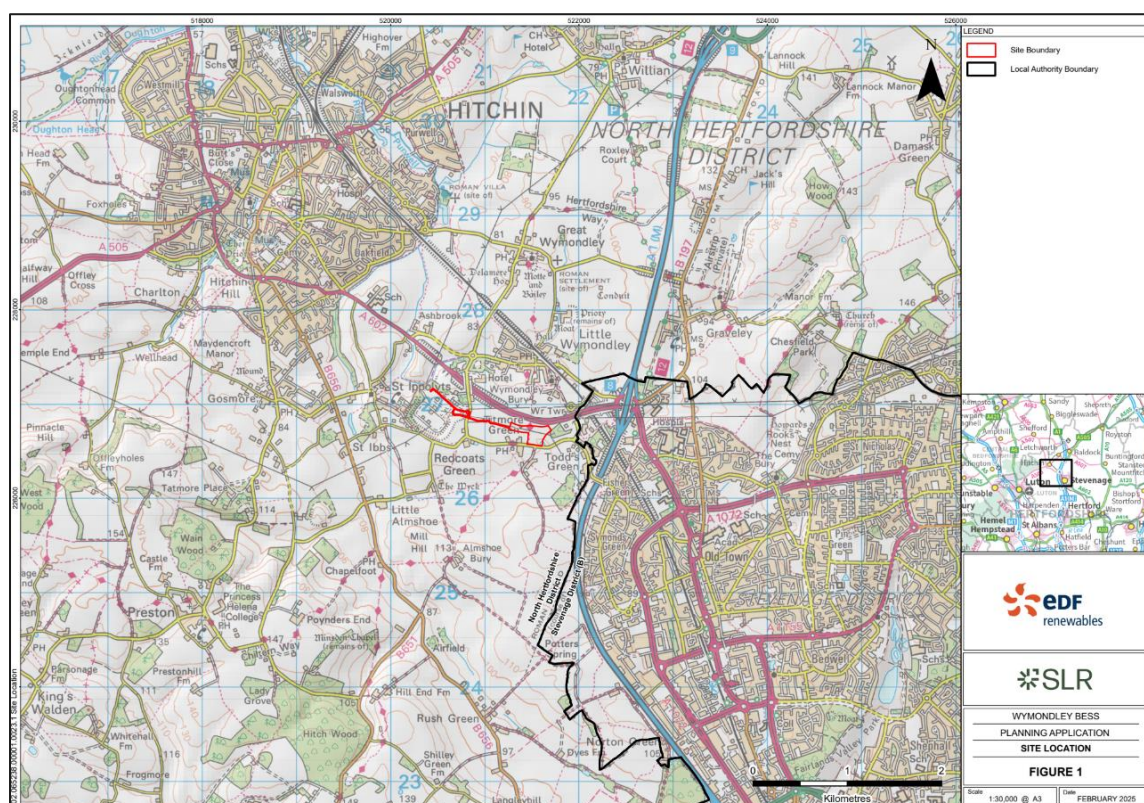
1.1 Proposal Overview

This Planning, Design, and Access Statement (PDAS) is submitted in support of a full planning application for the installation and operation of a battery energy storage system (BESS) facility incorporating batteries, transformers, inverters, switchrooms, substation, water tank, other associated infrastructure plus cable ducts, fencing, access track, landscaping and drainage infrastructure.

The proposed location of the BESS compound is on land north of Stevenage Road, east of Titmore Green, Little Wymondley, Hitchin, Hertfordshire, SG4 7JT ("the Site"). An underground cable is proposed to connect the BESS to a point of connection inside the Wymondley National Grid substation.

The site location is shown below. Full details of the proposed development are provided in Section 3 and within the accompanying planning application plans.

Figure 1: Site Location Plan.



1.2 The Applicant

The Applicant is Pivoted Power LLP, a wholly owned subsidiary of EDF Energy Renewables Limited (EDF-R).

EDF-R's purpose is to accelerate a net zero future where clean energy powers our lives through delivering innovative wind, solar, battery storage and vital power infrastructure for charging electric vehicles.

EDF-R currently has 36 operational onshore wind farms, and a rapidly growing portfolio of solar and battery projects. In the UK and Ireland there are 17 solar sites either in operation,



under construction or planned. There are four battery storage locations now in operation and multiple other projects planned. There are two operational offshore wind farms.

EDF-R ancillary infrastructure (such as BESS developments) provides the National Grid with critical network balancing services.

1.2.1 What does EDF-R do?

EDF-R develops a range of projects to future-proof the UK's electricity system, integrate more renewable energy, and meet increasing electricity demand. Infrastructure investment is essential to accommodate this demand, including establishing new infrastructure to serve individual development areas and support existing and new grid substations and connections. This additional capacity will alleviate pressure on heavily utilised substations and provide room for growth.

EDF-R developments provide both national and local benefits:

- **National benefits:** providing critical system flexibility for the National Grid enabling the grid to remain in balance whilst accepting more renewable energy in place of fossil fuel (gas) powered stations.
- **Local benefits:** By developing EDF-R projects to assist connections into the national grid and increase local network resilience and capacity.

There are currently limited locations around the UK where affordable, high-power transmission network connections can offer local benefits. EDF-R has secured connections to the National Grid's high voltage transmission network at circa 40 strategic locations nationwide including Wymondley National Grid Substation.

1.2.2 Ensuring Energy Resilience

The nature of the UK's energy supply system is changing. Large-scale fossil fuel generating plants are being replaced by multiple, intermittent renewable generation sources alongside new nuclear power generation. This shift to renewable and low-carbon energy is positive but brings challenges in balancing the electricity supply system. When the supply system becomes imbalanced, there is a greater likelihood of local power blackouts as demand outstrips supply.

EDF-R's UK programme of grid-connected battery storage addresses this balancing issue directly by supplying energy during periods of low renewable energy generation. This approach forms a cornerstone of National Grid's current and future strategies for stable and predictable power delivery, providing critical supply flexibility to households and businesses while enhancing regional grid network resilience.

1.3 The Need Case

1.3.1 Energy Generation and Storage in the UK

Batteries are a critical component of the UK's renewable energy infrastructure as they provide essential balance and flexibility to the transmission and supply grids to support the expansion of intermittent renewable energy generation. This has been highlighted in a number of Government reports including:

- [National Infrastructure Strategy \(November 2020\)](#)
- [Industrial Decarbonisation Strategy \(2021\)](#)
- [British Energy Security Strategy \(2022\)](#)



National Grid's [Future Energy Scenarios \(FES\) published in July 2024](#) highlights the need for a twelve-fold increase in storage capacity (GW) from 2021 to 2050. Battery storage to increase from 7 GW in 2023 to as much as 29 GW by 2030 and 66 GW by 2050¹ to ensure the UK has access to clean, secure and affordable electricity by 2050 to meet the UK's net zero scenarios.

Updated government commitments were published in March 2023 - [Powering Up Britain Energy Security Plan](#) and [the Net Zero Growth Plan](#). These plans define a pathway for ensuring that energy within the UK is secure, low cost and low carbon - with a strong focus on local generation and storage for renewable sources.

Making Britain a clean energy superpower with zero carbon electricity by 2030 is one of the new Labour Prime Minister's five national missions. The new government has announced several new bills that are relevant to net zero which include the Great British Energy Bill (to set up a publicly owned clean power company to accelerate investment in renewable energy).

The National Energy System Operator (NESO) published ["Clean Power 2030"](#) in December 2024. The plan aims to generate all electricity from clean sources by 2030. It means a significant increase in capacity for battery storage. It states at page 8 of the executive summary that:

"Our clean power pathways see... an increase in grid connected battery storage from 5 GW to over 22 GW, more pumped storage and major expansions in onshore wind (from 14 GW to 27 GW) and solar (from 15 GW to 47 GW) along with nuclear plant life extensions."

Energy storage has multiple benefits for the system operator, consumers, and the environment. Two key benefits are:

- **Increased uptake of renewable energy:** Energy storage provides the required system stability to replace existing carbon-intensive fossil fuel plants. This reduces greenhouse gas emissions and is crucial for achieving the UK's net zero target by 2050.
- **Enhanced efficiency of existing assets:** Energy storage allows existing assets to work harder, avoiding the need to extend the transmission network by building new overhead lines and other infrastructure (BEIS 'Statement on the Future of Electricity System Operation' 2017).

Additionally, battery storage is a more sustainable way to achieve system stability compared to alternatives like gas peaking plants, which are fossil fuel-based and not zero carbon.

1.3.2 Climate Emergency

The UK government declared a climate emergency in May 2019 and has made a commitment to ensure the UK reduces its greenhouse gas emissions by 100% from 1990 levels by 2050 – known as 'net zero target'. North Hertfordshire Council (NHC) also declared a climate emergency in 2019 and has set an ambitious target of becoming carbon neutral by 2030, ahead of the government's target of 2050. Key documents include the Sustainability Supplementary Planning Document (SPD) 2024 and the NHC Climate Change Strategy 2022-2027. The energy sector is a key priority, and the Council aims to see more renewable energy projects installed across North Hertfordshire.

¹ Under the Electric Engagement Scenario which is achieving net zero through mainly electrified demand. The other three scenario pathways include Holistic Transition, Hydrogen Evolution and Counterfactual. See Future Energy Scenarios, Executive Summary, Comparing Our Pathways, page 20 Key comparison chart of decarbonisation milestones page 24 and Key Statistics page 26.



1.4 Structure of the Planning Design and Access Statement (PDAS)

Following the introduction in Section 1 of the PDAS, the remainder of the report is organised into the following sections:

- **Section 2** outlines the site selection process.
- **Section 3** provides a description of the site and surroundings.
- **Section 4** outlines the design evolution of the project.
- **Section 5** provides a description of the proposed development including the proposed cable route.
- **Section 6** explains the national planning policy context, notably the National Planning Policy Framework and what these policies mean.
- **Section 7** explains the local planning policy context taken from the North Hertfordshire Local Plan and what these policies mean.
- **Section 8** assesses the planning, environmental and technical considerations and appraises the proposed development against the relevant planning policies and any other material considerations.
- **Section 9** provides a summary and conclusions.



2.0 Site Selection Process

Battery storage sites are selected based on the strategic location of the National Grid substation and a number of key criteria. This section sets out details of the site and the selection process.

2.1 Strategic Substation Selection Process

National Grid owns 346 substations in England and Wales. Through detailed analysis, the Applicant, in consultation with National Grid, initially selected 45 substations for potential battery storage facility development. A sieving process was conducted to identify substations with known connection capacity, viable connection costs, and proximity to the strategic road network, where Pivoted Power LLP (now EDF-R) would consider developing a BESS. Further details on the sieving process are provided in Table 1 below.

Table 1: Strategic Substation Selection Process.

Stage 1: Assessment of National Grid substations UK-wide	
Battery storage facilities must be located close to substations to establish a connection. To identify feasible substations, the Applicant conducted a nationwide assessment of National Grid transmission network substations to determine those with both spare capacity and the ability to connect. Some substations had spare capacity but lacked a connection point. National Grid provided the necessary information for this assessment. After ruling out certain substations, the Applicant performed a sequential sieving exercise to further narrow down the substation locations under consideration. This process focused on key issues that would prevent a connection, as outlined below:	
Sieving Process	
The need for grid balancing	A first sieve was conducted to identify substations that would most directly benefit from frequency balancing. The Applicant collaborated with National Grid to determine which locations would best meet National Grid's requirement to maintain 'system frequency'. In areas of higher power demand (e.g., large urban areas) or 'pinch points' where capacity and demand are difficult to balance, greater value exists. Substations offering little or no value were excluded from further consideration.
Land availability	A second sieve aimed to determine the availability of land within approximately a 1km radius of each substation, including the feasibility of connecting a cable from the substation to the battery location. Both National Grid and third-party land were considered. Substations with no prospect of obtaining land were excluded at this stage.
Environmental constraints	The land identified in the previous sieve process was then analysed for environmental constraints. Further details on this step are provided in the detailed Sequential Assessment submitted alongside this PDAS (Appendix A).



Connection cost	The commercial viability of obtaining a connection was then assessed. National Grid provides prospective applicants with a connection cost, which varies depending on the amount of work required to accommodate the connection. Substations where the commercial model could not withstand the cost of connection were discarded at this stage.
Conclusion	The series of sieving exercises reduced the total number of potential substations under consideration from 346 to 45. This number has further decreased due to additional technical connection difficulties identified since the initial sieving exercise. Based on this process and the significant need for battery storage, the Applicant sought connection offers at all identified substations. Each connection offer requires a substantial financial deposit and an allocated connection date. The connection date, determined by National Grid, depends on when an 'outage' or temporary closure of the substation is possible. Currently, future connection dates range from 2025 to 2029.

2.1.1 Previous BESS Pre-Application Advice (2023)

SLR submitted a Pre-Application Consultation Request to NHC's Planning department in August 2023 (ref: 23/01773/PRE) on behalf of the Applicant for nearby site located at the corner of Stevenage Road and Chantry Lane, Little Wymondley, Hertfordshire. [*This is referred to as the 'Unnumbered Site' in the Alternative Sites Appraisal (ASA)*].

NHC's Planning Pre-Application advice was received on 11 September 2023. In summary, the council concluded that while the proposal aligned with [then] current and emerging Government policy, the site was not viewed favourably due to:

- the Green Belt location ('very special circumstances' (VSC) would need to be proven);
- parts of the site are within Flood Zones 2 and 3;
- a high-pressure gas pipeline crosses the site; and
- the proposal would be highly visible from Stevenage Road and the railway.

Following receipt of the Pre-Application advice, the Applicant completed the detailed drainage investigations and flood modelling for the site. Based on results of the investigations and NHC's Pre-Application advice the decision was taken to abort further investigation of that site for a BESS.

2.2 Wymondley BESS Detailed Site Selection Process

The strategic substation selection process identified Wymondley National Grid substation as a suitable connection point with the capacity to import and export electrical power. The Applicant has secured a connection agreement to this substation for the proposed BESS.

A detailed site selection process has been undertaken to identify an appropriate location for the BESS compound. This process considered a range of physical and environmental constraints. The *Sequential Assessment and Alternative Sites Assessment* report provided in Appendix A details the site selection process undertaken by the Applicant. In summary, the process considered the following:

Technical Criteria

- A site size of at least 1.6ha to accommodate a compound for the batteries, ancillary equipment, means of access and biodiversity net gain.



- A location in close proximity to the substation to limit electrical loss and ensure greater efficiency and also to support the commercial model. A site within 1km is preferred, however sites up to 1.5km are considered and up to 2km in some cases.

Preferential Criteria

- Avoid (if possible) areas at risk of flooding.
- Avoid (if possible) areas of statutory protection and ecological importance.
- Close proximity to the primary highway route network to enable batteries to be delivered to site without the need for special arrangements or highway improvements.
- Buffer from residential properties of 50m (minimum) but 150m or more preferred (judgement generally on a site-by-site basis).
- Available for development.
- Relatively level site to limit the need for earthworks.

2.2.1 Sequential Assessment and Alternative Sites Appraisal

The sequential assessment (SA) and alternative sites appraisal (ASA) for the BESS development at Wymondley have been undertaken with thorough consideration of various constraints and opportunities. The methodology involved a detailed three-stage process: sieving environmental constraints, conducting a sequential assessment, and performing an ASA.

The assessment identified very limited unconstrained land within a 2km radius of the Wymondley Substation and none of the small pockets of land were suitable for a BESS development; they were either within Little Wymondley settlement boundary or had flood risk constraints. The remaining land, unconstrained by key environmental or technical constraints, is all found within the Green Belt. **Therefore, the search for sites necessarily had to focus only on unconstrained sites within the Green Belt.** Despite the extensive search, only ten sites were shortlisted from the 51 assessed, with an additional site considered but later aborted due to flood risk considerations.

The proposed BESS site has been selected as the most suitable of the shortlisted sites. The site is bounded by the A602 dual carriageway to the north, Stevenage Road and Chantry Lane to the south and east, and contains several pylons with overhead cables, making it relatively contained. Access, topography, and distance to the point of connection (POC) for cabling was deemed acceptable. It is well screened and over 150m from the nearest residential property.

The comprehensive assessment and selection process demonstrates that the proposed site is the most viable option for the BESS development, considering the constraints and requirements. This supports the case for VSC necessary for development within the Green Belt.

Full details are provided Appendix A.

2.3 Site Investigations

In 2024, the Applicant commissioned a series of detailed site investigations for the preferred site, which is the subject of this application. These investigations included:

- High level planning review.
- GIS site constraints mapping.
- Stage 1 desktop geotechnical and geoenvironmental assessment.



- Utility search report.
- Access point visibility splay assessment.
- Topographical survey.
- Background noise surveys.
- Flood risk assessment and drainage options review.
- Infiltration testing.
- Tree surveys.
- Ecological surveys
- Ecological Impact Assessment (EclA).
- Landscape and Visual Appraisal (including initial Zone of Theoretical Visibility (ZTV)).

The significant constraints identified as part of the above site investigations include:

- The Green Belt constraint; and
- Drainage constraints.

2.4 Pre-Application Consultations Undertaken / Ongoing

A number of preliminary consultations have been undertaken to seek advice on the proposed location for a BESS development. These included the following:

- On-going discussions and liaison between the Applicant and National Grid.
- On-going discussions and liaison between the Applicant and Hertfordshire Fire and Rescue Service.
- Flood Risk and Drainage Pre-Application Consultation with the Lead Local Flood Authority (LLFA.)
- Planning Pre-Application Consultation with North Hertfordshire District Council (NHC).

2.4.1 Current BESS Pre-Application Advice (2024-25)

The Applicant submitted a Pre-Application Consultation Request to NHC's Planning department on 26 November 2024 (*ref: 24/02717/PRE*). No response had been received at the time of submission of this application.

2.5 Review of Planning History

There is no planning application history associated with the BESS compound site.

2.5.1 Nearby Energy Proposals

There are a number of other energy related projects consented and under consideration nearby. These are identified in Table 2.

Table 2: Nearby Energy Development Proposals.

Project Application No.	Status	Distance from the site	Details



25/00287/SO	EIA Not Required	1.2km northwest of the Site.	A request for an EIA Screening Opinion was submitted for the construction and operation of a BESS and associated infrastructure.
24/02455/FP	Under consideration	700m south-west of the Site.	Planning application for construction/ operation of a 35.5 ha solar farm, with associated BESS and ancillary infrastructure.
24/00314/FP	Withdrawn	2.5km south of the Site.	Planning application for construction/ operation of a Battery Storage Facility. The proposed Grid connection for this development is at the substation off Cavendish Road. <u>Note:</u> This site is located within the Green Belt.
24/02333/FP	Under consideration	1.2km northwest of the Site	Planning application for an electrical connection between the approved Priory Farm Solar Array and Wymondley Substation.
24/01666/SO	EIA Not required	700m west of the Site	A request for an EIA Screening Opinion was submitted in late July 2024 for a solar farm and associated battery storage site. This is the same site and proposal as 22/00709/FP
24/00777/SO	EIA Not Required	10km north of the Site	A request for an EIA Screening Opinion for a BESS and associated infrastructure located outside of the Green Belt.
22/03231/FP	Refused	7km south west of the Site	Planning application for a solar farm measuring 106 hectares with associated battery storage and ancillary infrastructure. The application was refused by NHC in July 2024 due to harm to the Green Belt by reason of inappropriate development and unacceptable harm to the character and appearance of the surrounding area.
22/00709/FP	Refused	700m west of the Site	Planning application for a solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure. The application was refused by NHC in November 2023 due to harm to the Green Belt by reason of inappropriate development and unacceptable harm to the character and appearance of the surrounding area.
22/00741/FP	Granted	11km north of the Site	Planning application for a proposed solar farm and ancillary infrastructure.



21/03380/FP	Granted	1km northeast of the Site	Planning application was submitted in 2021 for a solar farm measuring 88 hectares, including associated battery storage containers, transformer stations, storage buildings, fencing, etc., at land on Graveley Lane and to the east of Great Wymondley, Hertfordshire. On 26 May 2023, the planning application was called in by the Secretary of State (SoS), who became the determining authority. An inquiry took place in September 2023, with a report issued by the Inspector to the SoS recommending planning permission be refused. On 11 March 2024, the SoS disagreed with the Inspector's recommendation and granted planning permission for the proposal. The SoS disagreed with the weight the Inspector placed on the development's contribution towards renewable energy targets. The SoS considered that very special circumstances (VSC) had been established and granted planning permission, stating, <i>"the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations, and therefore considers that VSCs exist."</i>
21/01860/FP	Granted	2.5km south of the site	Planning application for the installation and operation of a 10MW battery storage facility. Note: This site is located within the Green Belt.
16/03171/1	Granted	2.5km south of the site	Planning application for the installation and operation of a 10MW battery storage facility. Note: This site is on the land immediately south of 21/01860/FP.



3.0 Site Description and Surrounding Area

This Section describes the existing physical and environmental characteristics of the land and buildings comprised within and surrounding the site.

3.1 Location

The site is located northwest of Stevenage, within the parish of Wymondley. It is situated southwest of Junction 8 of the A1(M) and directly south of the A602 bypass, as shown in Figure 1. The site is approximately 500m east of the National Grid Wymondley Substation, where a grid connection has been secured.

The proposed underground cabling route runs west from the battery compound along the fence line in the adjacent fields, before crossing underneath Blakemore End Road and continuing west into the National Grid substation compound.

The site falls within the administrative area of NHC.

3.2 Site Description

The proposed site is 6.52 hectares and consists of a gently sloping agricultural field, along with a narrow cable corridor connecting the field to the nearby Wymondley National Grid Substation. There is existing access to the BESS location from Stevenage Road, as shown in Figure 2.

The BESS site is bounded by a tree belt and the A602 to the north, Stevenage Road to the south, the Hertfordshire Way Public Right of Way (PRoW) to the west and Bury Wood and a dog exercise park to the east. Overhead lines (OHLs) cross the agricultural field in an east-west direction. The site is well screened from the A602 and Stevenage Road by dense treelines. There are also trees along the PRoW route to the west of the site.

Figure 2: Existing Access from Stevenage Road.



3.2.1.1 Topography

The main part of the site is situated on a gradual slope with the northeast corner approximately +97.02m Above Ordnance Datum (AOD) down to +91.69m AOD at the entrance to Stevenage Road to the southwest.



3.2.1.2 Ponds

There is one pond located in the southern part of the Site adjacent to Stevenage Road, referred to as 'Lawn Pond'.

3.2.1.3 Trees

The site is well screened by mature trees and vegetation around the north and southern perimeter. An Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP) are submitted with the application.

3.3 Land Use, Designations and Constraints

3.3.1 Existing and Historical Use

The surrounding area consists of agricultural fields, mature hedgerows, and scattered villages. Key features in the immediate area include transport corridors and energy infrastructure associated with the National Grid Wymondley substation.

The majority of the proposal site is agricultural farmland used for grazing. A review of the agricultural land classification (ALC) records and neighbouring development documents suggests that this is Grade 3 arable land.

The nearest residential receptors are Beech House, Titmore Green Farmhouse, and Titmore Court, located approximately 100m to the west and southwest of the site boundary (but over 160m from the proposed BESS compound fence). They are separated from the site by mature trees. There are also residential areas to the southeast and southwest of the site.

The Historic Environmental Desk-Based Assessment (HEDBA) accompanying this application identifies all the heritage designations. Beech House and Titmore Green Farmhouse are Grade II listed buildings. The site is situated within a Medieval Deer Park, and Roman and Medieval finds have been recorded in close proximity to the northeast and north of the site.

Constraints mapping, by topic area, within a 2km radius of the site has been provided as Appendix B.

3.3.2 Planning Policy Designations

The site is designated as Green Belt in the North Hertfordshire Local Plan (November 2022). The North Hertfordshire Local Plan 2011-2031: Green Belt Review, initially published in 2016 and updated in 2018, assesses the contribution of the Green Belt within North Hertfordshire to the purposes outlined in the NPPF. The review divides the Green Belt into 22 parcels for detailed analysis.

The site is situated in the southern part of parcel 10: Little Wymondley, which spans the area between southeast Hitchin and northwest Stevenage, excluding the settlement area of Little Wymondley. The boundaries are defined by the Hitchin settlement edge, the district boundary at Stevenage, the A1(M), and various local roads.

Table 3 overleaf summarises the review for parcel 10: Little Wymondley, focusing on its contribution to four of the five Green Belt purposes. Green Belt Purpose 5, as defined in the NPPF, is not assessed in this review.

Parcel 10 was split into five areas in the NHC Green Belt Review. The proposed site is located within sub parcel 10e (South of A602 Wymondley bypass bounded by Blakemore End Road, Stevenage Road and Stevenage and Todd's Green). It was assessed as Visual Openness (Low / Mixed), Physical Openness (Low / Mixed), Safeguard from encroachment (Moderate) and Overall Contribution to Green Belt (Significant).



Table 3: Parcel 10 Little Wymondley.

Green Belt Purpose	Parcel 10: Little Wymondley Strategic Assessment of the existing Green Belt
<i>Purpose 1: To check the unrestricted sprawl of large built-up areas</i>	Significant
<i>Purpose 2: To prevent neighbouring towns merging into one another</i>	Significant
<i>Purpose 3: To assist in safeguarding the countryside from encroachment</i>	Moderate
<i>Purpose 4: To preserve the setting and special character of historic towns</i>	Moderate
<i>Overall</i>	Significant

3.3.3 Other Designations

A review of the Environment Agency Flood Mapping confirms the Site is within Flood Zone 1 (i.e., low risk of flooding).

There is a designated Public Right of Way (PRoW) running adjacent to the site boundary, to the west, which is part of the 'Hertfordshire Way' long distance footpath. The Landscape and Visual Appraisal (LVApp) Figure LA.03 Public Access identifies footpaths within the 2km study area.

3.3.1 Physical Constraints

A National Grid gas pipeline is located beneath the eastern side of the site, requiring a 12-metre easement (6 metres on either side) to remain free of development. From the northeast corner of the site, the pipeline follows a southwest alignment. There is an underground (disused) main water pipe that also runs beneath the site in a northeast – southwest alignment. Additionally, National Grid overhead lines (OHLs) cross the site in an east-west direction. Please refer to the Site Constraints Plan (drawing no: WYM-EDFR-BESS-CIV-PLN-250-11) submitted alongside this Application.



4.0 Design Evolution

The site design reflects key design principles and an understanding of the technical and environmental characteristics and consultee advice.

4.1 Design Principles

The project design principles reflect the need to minimise impacts from the new development.

1. Retain existing trees and vegetation.
2. Minimise development footprint and seek sustainable solutions.
3. Enhance biodiversity and landscape screening.
4. Respect local communities and minimise disturbance.
5. Retain and enhance existing and public and permissive access routes.

4.2 Iterative Design Process

The site design has evolved gradually over time as new information and advice became available. In early to mid-January the consultant team were provided with a draft scheme to formally appraise at a design workshop.

4.2.1 Design Workshop

The Applicant and the consultant team held an interactive design workshop on 16 January 2025. In the workshop each technical discipline team presented their baseline findings, an appraisal of the draft scheme, key issues and recommendations. In the session the team worked together to update and amend the proposals. The key issues and outcomes of that meeting are set out in Table 4.

Table 4: Key Design Outcomes from January 2025 Workshop.

Issue	Design Consideration	Link to Design Principle
Drainage	The proposed drainage strategy was confirmed. The strategy uses a connection pipe from the swale into Lawn Pond, then into a culvert which goes east towards a nearby ditch.	2. Minimise development footprint and seek sustainable solutions.
Transport	Use existing access into site. Swept paths confirmed that access width sufficient therefore minimising physical alteration to site entrance	2. Minimise development footprint and seek sustainable solutions.



Trees	To avoid impacts on the trees adjacent to the access tracks, mitigation methods were agreed including slightly re-aligning the access track and/or the use of geo material (weight bearing structures) to protect the root structures. The cable route was also slightly diverted to avoid impacting tree root protection areas. Horizontal Directional Drilling (HDD) under dense woodland in the National Grid compound was also proposed.	1. Retain existing trees and vegetation. 4. Respect local communities and minimise disturbance.
Biodiversity and Landscape Screening	Landscape planting strategy developed around the perimeter of the battery compound to provide screening and biodiversity enhancement. Enhance existing Lawn Pond to provide biodiversity improvements.	3. Enhance biodiversity and landscape screening.
Public Right of Way (PRoW)	Need for temporary closure of the PRoW for the cable route construction. Path to be reinstated.	4. Respect local communities and minimise disturbance.
Visual Impact	PRoW requires screening to minimise impact for users. Additional planting to be introduced along Stevenage Road to fill gaps following recent construction activities.	3. Enhance biodiversity and landscape screening. 4. Respect local communities and minimise disturbance.
Noise	Incorporate acoustic attenuation kit on top of the batteries to minimise potential noise impacts.	4. Respect local communities and minimise disturbance.
Heritage and Archaeology	Concluded that nearby listed buildings would not be materially impacted by the development in this location.	2. Minimise development footprint and seek sustainable solutions. 4. Respect local communities and minimise disturbance.

4.3 Final Design

The final design has been subject to various minor amendments throughout January, February and March 2025 and is presented in Section 5 of this report.

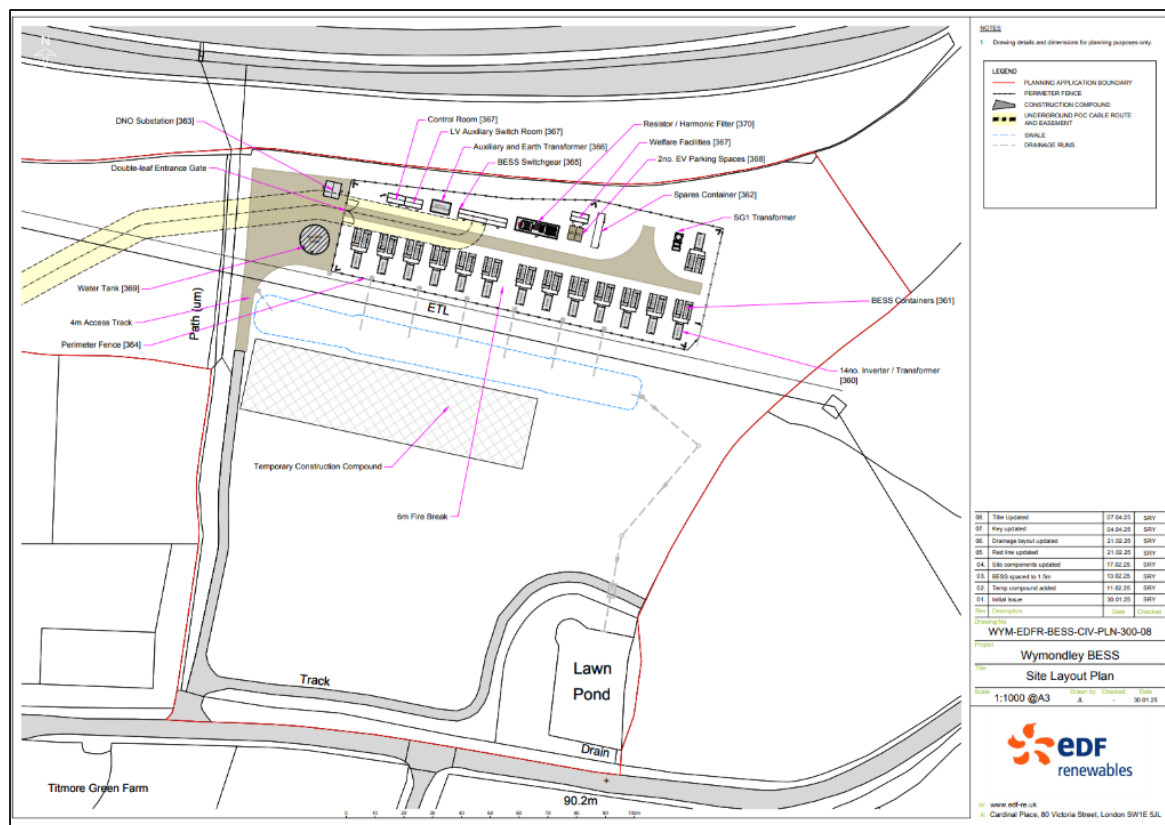


5.0 Proposed Development

5.1 Works Requiring Planning Permission

The Applicant is seeking planning permission for the installation of a BESS and associated development. The development would comprise the following elements identified in the Wymondley BESS Site Layout Plan (Drawing No. WYM-EDFR-BESS-CIV-PLN-300-08) and other detailed drawings identified in Table 5.

Figure 3: Site Layout Plan.



5.1.1 Proposed Development

5.1.1.1 BESS Compound Area

The majority of the proposed development will be contained within a fenced compound.

Specific components include:

- 28 BESS Units (containerised)** on concrete foundations. The battery units will be metal and finished in a light grey colour. An acoustic attenuation kit would be incorporated onto the top of each battery container. Each container can be accessed from one side elevation and from the front elevation. Please refer to Drawing WYM-EDFR-BESS-ARC-DRG-361. The dimensions are:
 - Height = 4.182m (including the noise attenuation and concrete plinth)
 - Length = 6.058m
 - Width = 2.658m
- 14 Medium Voltage (MV) Skids.** An MV Skid is a self-contained system which compacts a Power Conversion System and inverter / transformer into the one unit.



There is one MV Skid for every two BESS Units. Please refer to Drawing WYM-EDFR-BESS-ARC-DRG-360. The dimensions are:

- Height = 3.196m (including the concrete plinth)
- Length = 6.058m
- Width = 2.438m
- Other ancillary equipment includes:
 - Control Room with external PIR Lighting
 - LV Auxiliary Switch Room Unit with external PIR Lighting
 - Auxiliary and Earth Transformer Unit
 - BESS Switchgear Unit with external PIR Lighting
 - Resistor / Harmonic Filter Unit
 - Welfare Facilities Unit with external PIR lighting
 - Spare Parts Container Unit
 - SG1 Transformer
 - 2 (no.) EV Parking Spaces (for site operatives)
 - A DNO Incomer Substation (outside the fence)
 - A Water Tank 10.458m wide x 3.93m high (excluding the ladder) which would be located outside the fence) on the west side of the compound.
- The erection of a 2.75m security fence around the battery compound with 2.75m high x 8m wide double-leaf metal access gates to the compound entrance.
- The erection of infrared CCTV cameras on 4.2m high poles. The infrared camera units are around the size of a large show box and will not require lighting. These will be in corner locations within the compound and will be directed inwards towards the battery units.
- Filter drains on the southern side of the battery compound.

5.1.1.2 Areas outside the fenced compound

A gravelled area (34m x 32m at the widest point) west of the fenced area includes an area for parking and turning, a water tank and a DNO substation. Specific components include:

- Access track upgrade (to 4m width) from Stevenage Road up to the BESS compound area. No alterations are proposed where the access meets Stevenage Road (public highway).
- Drainage attenuation swale to the south of the compound, approximately 131m x 11m width at the top of the bank and 123m x 4m to 7m base width x 1m depth. A hydrobrake (emergency flap valve) would be located at the east side to restrict flows to the discharge pipe. An interceptor would be incorporated before the point of discharge at Lawn Pond to the south.
- Drainage pipe connecting the swale to the discharge point into Lawn Pond.
- Planting and biodiversity enhancements – trees, improvements to the existing hedgerow and protective fencing and mixed scrub planting.



5.1.1.3 Underground Cable Ducts Corridor

The point of connection cable ducts would be laid from the BESS Switch Room into Wymondley National Grid Substation. Please refer to drawings WYM-EDFR-BESS-CIV-PLN-340.02 - Site Cable Route Sheets 1 to 5.

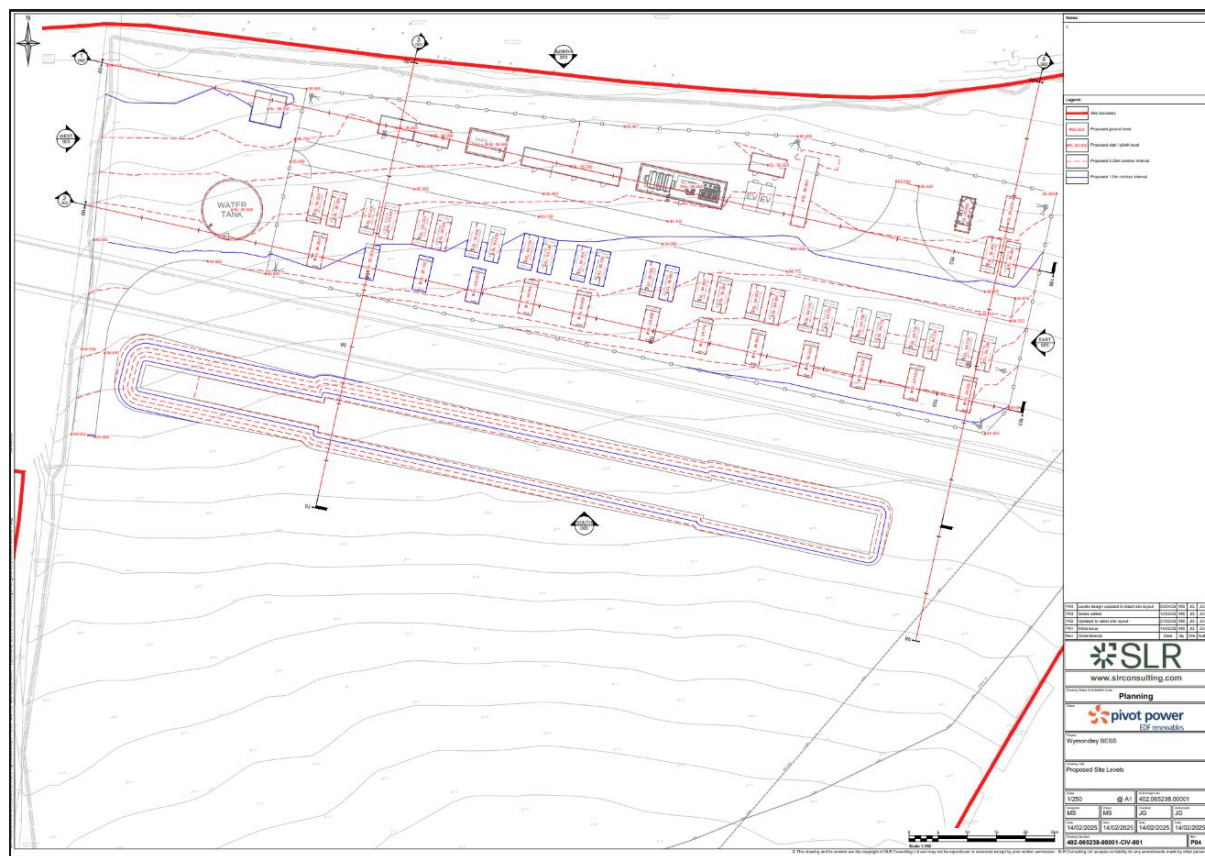
- The majority of the cable duct route would require a trench approximate to 3 – 5m wide, and 0.9m to 1.5m deep to be excavated within an 8m easement, using a 10m working corridor.
- A 150m section would be constructed via Horizontal Directional Drill method (below Blakemore End Road and the woodland within National Grid landholding)

5.1.1.4 Site Levels and Design

The site design has been influenced by the existing terrain. The site will slope downwards from north to south with proposed levels ranging from 95.500m AOD at the northern boundary, to around 93.989m AOD at the access track onto Stevenage Road.

The proposed site levels are shown on Figure 4 below. Please refer to the accompanying drawings 402-065238-00001-CIV-001-A1L, 402-065238-00001-CIV-002 and 402-065238-00001-CIV-003.

Figure 4: Proposed Site Levels.



5.1.1.5 Foundations and Height of Development

The BESS units and MV Skids would be sited on top of concrete plinth foundations, which rise 300mm above ground level. All other units would also be installed on concrete strip foundations, also rising 300mm above ground level.



The highest element on site would be the BESS Units with the noise attenuation units (including the foundations) at **4.182m** above ground.

The other associated development on site including the control, switch rooms, spare parts container and would be up to a maximum of **3.3m** in height.

The water tank would be at a height of **3.93m** (excluding the ladder).

5.1.2 Works that are Permitted Development

The temporary laydown and construction area is shown to the south of the proposed swale.

Other construction laydown areas would be located at the field east of Blakemore End Road for the HDD equipment. There is an existing access gate at Blakemore End Road that would be used.

These would ordinarily be permitted development under Part 4 Class A (temporary uses and structures) being *“The provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land”*.

5.1.3 Construction

The construction, installation and commissioning of the development will take approximately 14 months to complete. The programme of construction activities is anticipated as follows:

Site Establishment

- Pre-construction site surveys.
- Installation of site security fencing and tree protection barriers.
- Permitted felling / pruning of existing trees and hedges.
- Site strip removal of arisings from site.
- Installation of temporary site accommodation, welfare and contractor onsite parking.

Ground Works

- Excavation for new drainage.
- Construction of new tracks, paths, and parking.
- Excavations for and casting of concrete foundations.
- Excavations for installation and connection of new utility services.
- Directional drilling for required sections of the underground cable route.
- Electrical works.

Super Structure Works

- Installation of cabling.
- Delivery and installation of generator containers, radiators, and exhaust stacks.
- Delivery and installation of transformer and compound.
- Delivery and installation of ancillary infrastructure.
- Delivery and installation of final welfare and storage buildings.



External Works

- Boundary fencing.
- Restoration, landscaping and planting.

Testing and Commissioning

- The construction phase would be followed by a testing and commissioning phase.

5.1.4 Proposed Construction Methods

Early works will include the earthworks to create the proposed levels and upgrade of the 4m wide access track. The access track will be upgraded with rolled crushed stone, which will be permeable and allow for natural drainage.

The site compound surface will include the concrete battery pads, concrete bases for other site equipment with the remaining area surfaced with permeable crushed aggregate. An area will be excavated, and the concrete pads will be either poured or laid as pre-cast blocks and the battery units will be delivered by Heavy Goods Vehicle (HGV) and craned into position.

Estimated deliveries are set out below in Table 5.

Table 5: Estimated Deliveries.

Description Estimated	Est Deliveries (no.)	Vehicle Type
Containers of batteries	28	16.5m articulated HGV
ACC/DCC cabinets	6	16.5m articulated HGV
Spare parts container and spares	5	16.5m articulated HGV
Substation GRP buildings	4	16.5m articulated HGV
MV Skids	14	16.5m articulated HGV
Harmonic Filter	3	16.5m articulated HGV
Ready mix concrete/pre-cast concrete	50	16.5m articulated HGV/ concrete mixer
Consumables for site	9	16.5m articulated HGV
Temporary welfare facilities	4	7.5t rigid HGV
Generators	36	16.5m articulated HGV
Cranes for installation of battery containers	4	16.5m articulated HGV
Site road and compound construction material	60	20t tipper HGV
Removal of excess soil	240	20t tipper HGV
Miscellaneous plant	19	16.5m articulated HGV
Cables	19	16.5m articulated HGV
Other materials for site.	19	7.5t rigid
Total	520	

Table 5 confirms that the estimated number of construction vehicles anticipated throughout the whole construction period is 520 trips or 1,403 two-way movements; this translates to more than 4 HGV trip two-way movements per day, assuming a total of 21 working days per



month. However, this 'average' figure is not considered to be a realistic calculation of the likely peak traffic generation.

It is assumed that during the peak period of the construction stage would result in a maximum 11 two-way HGV movements daily. This peak period is anticipated to last for no more than a month, with all other months generating less daily HGV trips than this period.

The scheduling of trips and use of local contractors/ labour will help to reduce the overall impact of the proposed works on the wider highway network

5.1.4.1 Proposed Site Hours

The proposed working hours during the construction phase are as follows:

- Monday to Saturday: 7:00 to 18:00
- Sunday and Bank/National holidays: No work

In the event that works are required outside of these standard working hours, then these would be agreed with NHC.

It is anticipated that the construction workers will travel from the local area, and it is expected that the contractor will use a staff bus to transport workers to and from the Site. Access for workers and visitors will be provided via the existing access.

5.1.4.2 Staff

It is anticipated that the construction workers will travel from the local area, and it is expected that the contractor will use a staff bus to transport workers to and from the Site. Access for workers and visitors will be provided via the proposed access.

All staff trips would arrive before the working day begins at 07:00, therefore all arrival trips will be made during the hour of 06:00-07:00, while staff would be expected to leave between the hours of 18:00-19:00.

5.2 Planning Application Drawings

Table 6: Planning Application Drawings.

Plan Name	Source	Drawing Reference	Scale	Date
Site Location (Strategic) Figure 1	SLR	402.065238.00001.0023.1 Site Location	1:30,000@A3	February 2025
Site Context Plan Figure 2	SLR	402.065238.00001.0024.1 Site Context Plan	1:5,000@A3	February 2025
Site Context Plan – Aerial Figure 3	SLR	402.065238.00001.0025.1 Site Context Plan Aerial	1:5,000@A3	February 2025
Block Plan Figure 4.1	SLR	402.065238.00001.0026.1 Block Plan	1:1,000@A3	April 2025
Block Plan Figure 4.2	SLR	402.065238.00001.0026.1 Block Plan	1:1,000@A3	April 2025
Block Plan Figure 4.3	SLR	402.065238.00001.0026.1 Block Plan	1:1,000@A3	April 2025
Block Plan Figure 4.4	SLR	402.065238.00001.0026.1 Block Plan	1:1,000@A3	April 2025
Block Plan Figure 4.5	SLR	402.065238.00001.0026.1 Block Plan	1:1,000@A3	April 2025
Proposed Site Levels	SLR	402-065238-00001-CIV-001-P04	1:250 @A1	14.02.2025



Plan Name	Source	Drawing Reference	Scale	Date
Proposed Site Sections	SLR	402-065238-00001-CIV-002-P02	1:250 @A1	14.03.2025
Proposed Site Elevations	SLR	402-065238-00001-CIV-003-P02	1:250 @A1	14.03.2025
PCS & Transformer Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-360.00	1:25@A1	24.01.25
Spare Parts Container Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-362.01	1:25@A1	24.01.25
Battery Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-361.00	1:25@A1	24.01.25
DNO Incomer Substation Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-363.00	1:30@A1	24.01.25
Fencing, Gate, and CCTV Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-364.00	1:25@A1	24.01.25
BESS 33kV Switch Room Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-365.01	1:30@A1	24.01.25
Auxiliary & Earthing Transformer Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-366.00	1:25@A1	24.01.25
LV Auxiliary Switch Room, Control Room & Welfare Unit Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-367.01	1:30@A1	24.01.25
EV Charge Point Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-369.00	1:30@A1	24.01.25
Water Tank Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-369.01	1:40@A1	24.01.25
Harmonic Filter Arrangement	EDF-R	WYM-EDFR-BESS-ARC-DRG-372.00	1:30@A1	24.01.25
Site Constraints Plan	EDF-R	WYM-EDFR-BESS-CIV-PLN-250-11	1:1,000@A3	16.01.2025
Site Layout Plan	EDF-R	WYM-EDFR-BESS-CIV-PLN-300-08	1:1,000@A3	30.01.25
Site Cable Route – Sheet 1	EDF-R	WYM-EDFR-BESS-CIV-PLN-340-02	1:1,000@A3	04.04.25
Site Cable Route – Sheet 2	EDF-R	WYM-EDFR-BESS-CIV-PLN-341-02	1:1,000@A3	04.04.25
Site Cable Route – Sheet 3	EDF-R	WYM-EDFR-BESS-CIV-PLN-342-01.02	1:1,000@A3	04.04.25
Site Cable Route – Sheet 4	EDF-R	WYM-EDFR-BESS-CIV-PLN-343-02	1:1,000@A3	04.04.25
Site Cable Route – Sheet 5	EDF-R	WYM-EDFR-BESS-CIV-PLN-344-02	1:1,000@A3	04.04.25
Site Location Plan	EDF-R	WYM-EDFR-BESS-LND-PLN-150.05	1:5,000@A3	30.01.25
Landscape Strategy and Landscape Specification	Tir	L100 Rev A L101 Rev A	1:5,000@A3	03.04.25



6.0 Planning Policy Context

6.1 Introduction

This section sets out the key national and local planning policies that relate specifically to the development. The aim of this chapter is to establish the land use implications of the development and identify other material considerations to be considered during the determination process.

6.2 Legislative Background

Section 38(6) of the Planning and compulsory Purchase Act 2004 and section 70(2) of the Town and Country Act 1990 require that applications for planning permission be determined in accordance with the provisions of the development plan unless material conditions indicate otherwise. This is confirmed by the National Planning Policy Framework (NPPF) 2024, which highlights the importance of the plan-led approach at paragraph 15.

6.3 National Planning Policy Framework (NPPF)

The NPPF is the overarching guidance documents which helps Local Planning Authorities (LPA) within England in their decision making. The purpose of the planning system is to contribute to the achievement of sustainable development. The Framework carries with it a presumption in favour of sustainable development which is defined as having a social, economic and environmental role.

The guidance was first introduced into the planning system in March 2012 however since the publication was made there have been several revisions with the most recent update being 7 February 2025. It is important to note that the NPPF is a material planning consideration which must be taken into consideration when determining planning proposals.

6.3.1 Achieving Sustainable Development

Decision taking for development proposals that accord with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in NPPF taken as a whole.

Paragraph 11 states:

“For decision-taking this means:

- *Approving development proposals that accord with the development plan without delay; or*
- *Where there are no relevant development plan policies, or the policies which are the most important for determining the application are out-of-date, granting permission unless:*
 - *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposal; or*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.*



6.3.2 Presumption in Favour of Sustainable Development

The NPPF emphasises the importance of achieving sustainable development. There are three fundamental objectives set out within the guidance.

Paragraph 8 states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **An economic objective** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **A social objective** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **An environmental objective** - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

Point c) is particularly relevant as battery storage technology now allows large amounts of electricity to be stored, including electricity generated by zero carbon/carbon neutral sources, which explicitly supports the country's transition to a low carbon economy by helping the National Grid manage the electricity transmission system. Battery storage has been identified as having a key role to play in helping the UK grid transition to net zero.

6.3.3 Considering Development Proposals

The NPPF outlines that new development should make provision for safe and suitable access for all, contributing towards a resilient and reliable transport system for people, goods, and services.

Paragraph 116 sets out that:

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

6.3.1 Protecting the Green Belt

The NPPF sets out policies under themes that reflect the Government's key objectives for the planning system. Of particular relevance to this application are Chapter 13 'Protecting Green Belt land'.

Paragraph 143 sets out the 'five purposes' of the green belt, stating:

“Green Belt serves five purposes:

- a) *To check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*



Paragraph 153 sets out that:

“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.

Paragraph 153 states that:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

6.3.2 Renewable Energy

The planning system plays an important role in embedding Net Zero Carbon principles into the development industry. Section 14 of the NPPF provides guidance on climate change and how it can be achieved in a sustainable manner.

Paragraph 161 states:

“The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

Paragraph 168 states:

“When determining planning applications for renewable and low carbon development, local planning authorities should:

- a) Not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future;*
- b) Recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;*
- c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.”*

6.3.3 Planning and Flood Risk

The NPPF outlines that new development should avoid areas at highest flood risk (whether existing or future) and directed towards area of lowest flood risk.

Paragraph 170 states:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”.

6.3.4 Conserving and Enhancing the Natural Environment

The government focuses on how development proposals should aim to enhance the natural and local environment.



Paragraph 187 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

Paragraph 192 states:

“To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Paragraph 193 states:

“When determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*



6.3.1 Conserving and Enhancing the Historic Environment

Paragraph 207 outlines that for applications where there is the potential for heritage assets with archaeological interest, the applicant must undertake an appropriate desk-based assessment and, where necessary, a field evaluation

There are no designated heritage assets on the site; however, paragraph 216 outlines how planning policies and decisions need to consider the effect of an application on the significance of non-designated heritage assets, stating:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.



7.0 Local Planning Policy

7.1 Statutory Development Plan

The Development Plan for North Hertfordshire is made up of the following documents:

- North Hertfordshire Local Plan 2011-2031
- Wymondley Parish Neighbourhood Plan
- The adopted Minerals Local Plan and Waste Local Plan for Hertfordshire

7.1.1 North Hertfordshire Local Plan Policies Map

The North Hertfordshire Local Plan Policies Map does not identify the site within any key environmental designations. The site however is located in the Green Belt.

7.1.2 North Hertfordshire Local Plan

The North Hertfordshire Local Plan was formally adopted on 8 November 2022 and provides the overarching planning policy framework for North Hertfordshire up to 2031. Table 7 identifies the relevant Local Plan policies.

Table 7: Relevant Local Plan Policies

North Hertfordshire Local Plan 2011-2031
Policy SP1: Sustainable development in North Hertfordshire District
Policy SP5: Countryside and Green Belt
Policy SP11: Natural resources and sustainability
Policy SP12: Green infrastructure, landscape and biodiversity
Policy SP13: Historic environment
Policy T1: Assessment of transport matters
Policy D3: Protecting living conditions
Policy NE2: Landscape
Policy NE4: Biodiversity and geological sites
Policy NE7: Reducing flood risk
Policy NE8: Sustainable drainage systems
Policy NE9: Water quality and environment



Policy NE10: Water conservation and wastewater infrastructure
Policy NE12: Renewable and low carbon energy development
Policy HE3: Non-designated heritage assets
Policy HE4: Archaeology

7.1.2.1 Policy SP1: Sustainable Development in North Hertfordshire District

Policy SP1 is quoted in full below.

"This Plan supports the principles of sustainable development within North Hertfordshire. We will:

- a) Maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making use of previously developed land where possible;*
- b) Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;*
- c) Grant planning permission for proposals that, individually or cumulatively:*
 - i. deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;*
 - ii. create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;*
 - iii. provide the necessary infrastructure required to support an increasing population;*
 - iv. protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and*
 - v. secure any necessary mitigation measures that reduce the impact of development, including on climate change; and*
- d) Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan".*

7.1.2.2 Policy SP5: Countryside and Green Belt

Policy SP5 states (with particular sections underlined for emphasis):

"We support the principles of the Green Belt and recognise the intrinsic value of the countryside. Green Belt and Rural Areas Beyond the Green Belt are shown on the Policies Map. We:

- a) Have conducted a comprehensive review of the Green Belt. Land has been removed from the Green Belt to:*
 - i. Enable strategic development at the locations referred to in Policies SP8 and SP3;*
 - ii. Enable local development around a number of the District's towns and villages; and*
 - iii. Define boundaries for villages referred to in Policy SP2 which fall within the Green Belt but were previously 'washed over' by this designation;*
- b) Have provided new Green Belt to cover, in general terms, the area bounded by the Metropolitan Green Belt to the east, the Luton Green Belt to the west and the A505 Offley bypass to the north;*
- c) Will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated; and*
- d) Will operate a general policy of restraint in Rural Areas beyond the Green Belt through the application of our detailed policies".*



7.1.2.3 Policy SP11: Natural resources and sustainability

Policy SP11 states (with particular sections underlined for emphasis):

“This Plan seeks to meet the challenges of climate change and flooding. We will:

- a) Support proposals for renewable and low carbon energy development in appropriate locations;*
- b) Take a risk-based approach to development and flood risk, directing development to areas at lowest risk in accordance with the NPPF and ensuring the provision of Sustainable Drainage Systems (SuDS) and other appropriate measures;*
- c) Support the principles of the Water Environment (Water Framework Directive) Regulations 2017 and seek to protect, enhance and manage the water environment;*
- d) Give consideration to the potential or actual impact of land contamination and support proposals that involve the remediation of contaminated land; and*
- e) Work with utilities providers, East Hertfordshire District Council and relevant agencies to ensure additional wastewater treatment capacity is delivered without harm to protected European sites”.*

7.1.2.4 Policy SP12: Green infrastructure, landscape and biodiversity

Policy SP12 is quoted below:

“We will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. We will:

- a) Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure;*
- b) Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty;*
- c) Protect, enhance and manage designated sites in accordance with the following hierarchy of designations and features:*
 - o Internationally designated sites*
 - o Nationally designated sites*
 - o Locally designated sites;*
 - o Non-designated sites that include important habitats and species*
- d) Protect, enhance and manage biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, Local Geological Sites, protected species, priority species and habitats, and non-designated sites of ecological value and ensure measurable net gains for biodiversity; and*
- e) Protect other open spaces and support provision of new and improved open space”.*

7.1.2.5 Policy SP13: Historic environment

Policy SP13 is quoted below:



"This Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the management of its setting. We will pursue a positive strategy for the conservation and enjoyment of the historic environment through:

- a) Maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting according to their significance;*
- b) Identifying sites on the national register of Heritage at Risk or on the Council's 'At Risk' register;*
- c) Periodic reviews of Conservation Areas and other locally designated assets; and*
- d) Publication of detailed guidance".*

7.1.2.6 Policy T1: Assessment of transport matters

Policy T1 states:

"Planning permission will be granted provided that:

- a) Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network;*
- b) Mechanisms to secure any necessary sustainable transport measures and / or improvements to the existing highway network are secured in accordance with Policy SP7;*
- c) Suitable Transport Statements, Transport Assessments and / or Travel Plans along with supporting documents are provided where required; and*
- d) For major developments, applicants demonstrate (as far as is practicable) how:*
 - i. The proposed scheme would be served by public transport;*
 - ii. Safe, direct and convenient routes for pedestrians and cyclists will be provided; and*
 - iii. Comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured".*

7.1.2.7 Policy D3: Protecting living conditions

Policy D3 is quoted in full below.

"Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions.

Where the living conditions of proposed developments would be affected by an existing use or the living conditions of an existing development would be affected by a proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted".

7.1.2.8 Policy NE2: Landscape

Policy NE2 states:



“Planning permission will be granted for development proposals that:

- a) Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management;*
- b) Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this;*
- c) Are designed and located to ensure the health and future retention of important landscape features; and*
- d) Have considered the long-term management and maintenance of any existing and proposed landscaping.”*

7.1.2.9 Policy NE4: Biodiversity and Geological Sites

Policy NE4 states:

“Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12.

All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.

Applicants should, having regard to the status of any affected site(s) or feature(s):

- a) Submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site;*
- b) Demonstrate that adverse effects can be avoided and / or satisfactorily minimised having regard to the hierarchy of protection below:*
 - i. Locating on an alternative site with a less harmful impact;*
 - ii. Providing adequate mitigation measures; or*
 - iii. As a last resort compensated for.*

The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.

- c) Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction;*
- d) Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites;*
- e) Provide a long-term management and monitoring plan including mitigation measures as necessary.*

Local Geological Sites are ratified by the Herts & Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Local Wildlife Sites.”



7.1.2.10 Policy NE7: Reducing Flood Risk

Policy NE7 states that:

“Planning permission for development proposals will be granted provided that (as applicable):

- a) Development is located outside of medium and high-risk flood areas (flood zone 2 and 3) and other areas affected by other sources of flooding where possible;*
- b) Where (a) is not possible, application of the sequential and exception tests is demonstrated where development is proposed in areas of flood risk using the Strategic Flood Risk Assessment (SFRA) and Environment Agency flood maps;*
- c) A FRA has been prepared in accordance with national guidance that considers the lifetime of the development, climate change impacts and safe access and egress;*
- d) It will be located, designed and laid out to ensure the risk of flooding is reduced whilst not increasing flood risk elsewhere;*
- e) The impact of any residual flood risk will be minimised through flood resistant, resilient design and construction;*
- f) Any flood protection and mitigation measures necessary will not cause harm to nature conservation, heritage assets, and/ or landscape and recreation and, where possible, will have a positive impact in these respects; and*
- g) Overland flow routes and functional floodplain areas are protected from all development other than that which is “water compatible” and this must be designed and constructed to remain operational and safe for users during flood events, resulting in no net loss of flood plain storage and not impeding water flows or increasing flood risk elsewhere”.*

7.1.2.11 Policy NE8: Sustainable Drainage Systems

Policy NE8 states:

“Planning permission for development will be granted provided that:

- a) The most appropriate sustainable drainage solution is used taking into account technical, viability and design issues to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits;*
- b) It aims to mimic the natural drainage patterns and processes as far as possible; and*
- c) Drainage solutions follow the SuDS hierarchy”.*

7.1.2.12 Policy NE9: Water Quality and Environment

Policy NE9 states:

“Planning permission for development proposals will be granted provided that they make appropriate space for water, including (as applicable):

- a) Maintaining a minimum 8 metre wide undeveloped buffer zone from all designated main rivers;*
- b) Maintaining a minimum 5m wide undeveloped buffer zone for ordinary watercourses; and*
- c) River restoration and resilience improvements where proposals are situated close to a river or considered to affect nearby watercourses”.*



7.1.2.13 Policy NE10: Water Conservation and Wastewater Infrastructure

Policy NE10 states:

“Planning permission for new development will be granted provided that:

- a) It does not result in the deterioration of any watercourse in accordance with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD);*
- b) It helps contribute towards the Water Framework Directive (WFD) actions and objectives;*
- c) It helps achieve the objectives set out in the Anglian and Thames River Basin Management Plans;*
- d) Mechanisms for delivering any necessary new or improved water and/ or wastewater infrastructure are secured under the requirements of Policy SP7; and*
- e) Adequate foul water treatment and disposal already exists or can be provided in time to serve the development.*

New development around Stevenage within the Rye Meads Sewage Treatment Works Catchment will need to demonstrate that additional potable water supply and consequential wastewater treatment capacity can be achieved and implemented ahead of development without significant environmental impact, including adverse effects on designated sites”.

7.1.2.14 Policy NE12: Renewable and Low Carbon Energy Development

Policy NE12 states:

“Proposals for solar farms involving the best and most versatile agricultural land and proposals for wind turbines will be determined in accordance with national policy. Proposals for other renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon:

- i. Landscape quality, landscape character and visual amenity, including consideration of cumulative impacts of development;*
- ii. Environmental assets;*
- iii. The historic environment, including the impact on the setting of historic assets;*
- iv. The transport network;*
- v. Air quality;*
- vi. Aviation interests; and*
- vii. The amenity of residents.*

In assessing renewable and low carbon energy proposals against the above criteria the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, and the social benefits of community owned schemes where this is relevant.

Proposals for decentralised energy schemes associated with development of the strategic sites allocated in the Plan will be encouraged subject to an assessment of the impacts.

In all cases, end of life/redundant plant, buildings, apparatus, and infrastructure must be removed and the site restored to its former state or a condition agreed with the Council”.



7.1.2.15 Policy HE3: Non-designated heritage assets

Policy HE3 states:

“Permission for a proposal that would result in harm to, or the loss of, a non-designated heritage asset will only be granted provided that a balanced judgement has been made that assesses the scale of harm to, or loss of significance of the non-designated asset and, where the proposal results in the loss of a non-designated heritage asset:

- a) The replacement building contributes to preserving the local character and distinctiveness of the area; and*
- b) Where the asset is located in a conservation area a continuous contract for the demolition and redevelopment of the site has been secured, unless there are justifiable grounds for not developing the site”.*

7.1.2.16 Policy HE4: Archaeology

Policy HE4 states:

“Permission for development proposals affecting heritage assets with archaeological interest will be granted provided that:

- a) Developers submit an appropriate desk-based assessment and, where justified, an archaeological field evaluation.*
- b) It is demonstrated how archaeological remains will be preserved and incorporated into the layout of that development, if in situ preservation of important archaeological remains is considered preferable; and*
- c) Where the loss of the whole or a material part of important archaeological remains is justified, appropriate conditions are applied to ensure that the archaeological recording, reporting, publication and archiving of the results of such archaeological work is undertaken before it is damaged or lost.*

Where archaeological sites have been assessed to meet the criteria for inclusion on adopted registers or maps of locally important heritage assets these shall be treated in the same way as archaeology areas and areas of archaeological significance.

Areas of as yet, unknown archaeology may be identified during research, or through the planning or plan making process. These sites or areas should be treated in the same way as archaeology areas and areas of archaeological significance”.

7.1.3 Wymondley Parish Neighbourhood Plan

The Wymondley Parish Neighbourhood Plan area was designated by the Chief Executive in consultation with the Executive Member for Planning and Enterprise by a delegated decision on 26 August 2015. Table 8 identifies the relevant policies.

Table 8: Relevant Wymondley Parish Neighbourhood Plan Policies.

Wymondley Parish Neighborhood Plan	
Policy NHE1 Landscape Character	
Policy NHE2 Biodiversity	
Policy NHE6 Bats	
Policy NHE8 Landscaping Schemes	
Policy NHE9 Historic Character and Heritage Assets	
Policy GB1 Green Belt	



Policy FR1 Flood Risk
Policy FR2 Flood Risk Management
Policy TM1 Roads

7.1.3.1 Policy NHE1: Landscape Character

Policy NHE1 states:

“Where appropriate, planning applications should be accompanied by an assessment of the impact of the proposal on landscape character including historic landscape making reference to the relevant character assessment documents including the North Hertfordshire Landscape Study”.

7.1.3.2 Policy NHE2: Biodiversity

Policy NHE2 states:

“Proposals should, where appropriate be supported by a biodiversity action plan and measures to ensure net gains in biodiversity. The use of a Biodiversity Impact Assessment Calculator is encouraged”.

7.1.3.3 Policy NHE6: Bats

Policy NHE6 states:

“In considering development proposals that negatively impact upon bat movement corridors, we expect these corridors to be identified, protected and enhanced to ensure continued ecological functionality of bat populations. In considering ecological information in support of planning applications it is desirable that surveys undertaken by suitably qualified personnel and are consistent with nationally accepted standards i.e., British Standard 42020: Biodiversity – Code of practice for planning and development”.

7.1.3.4 Policy NHE8: Landscaping Schemes

Policy NHE8 states:

“In considering landscaping schemes we will expect that appropriate native species are used whenever possible and that benefits to biodiversity are maximised”.

7.1.3.5 Policy NHE9: Historic Character and Heritage Assets

Policy NHE9 states:

“Development proposals should reflect and where possible, enhance, the historic character of the area. Proposals affecting designated and non-designated heritage assets and their settings including those with archaeological interest must comply fully with the requirements of National Planning Policy and the development plan. To protect our natural and historic environment, and retain the rural character and intimate scale of Wymondley Parish any new development should:

- Be appropriately sited and of an appropriate scale, form and style;*
- Avoid visually intrusive locations such as upper ground where they would be visible from the skyline;*
- Avoid lighting that would create additional urbanising influences on the character of the area”.*



7.1.3.6 Policy GB1: Green Belt

Policy GB1 states:

“Development proposals impacting on Wymondley Parish must comply with Government Green Belt policy; primary consideration will be given to effective use of brown-field sites, which are not of high environmental value.

Development proposals should not impact negatively on Wymondley Parish - particularly in terms of visual impact on the openness of the Green Belt landscape and its important contribution to the character of our villages/hamlets”.

7.1.3.7 Policy FR1: Flood Risk

Policy FR1 states:

“Development proposals which would result in an increase in flood risk will not be supported. Development within 12m of a watercourse should be supported by any required Flood Risk Assessment and adequate information to assess the potential impact of the proposal on flooding both on and off site”.

7.1.3.8 Policy FR2: Flood Risk Management

Policy FR2 states:

“We believe an integrated, risk-based approach to flood risk management is the way forward, and strongly support the inclusion of Sustainable Urban Drainage Systems (SUDS) in any development proposal”.

7.1.3.9 Policy TM1: Roads

Policy TM1 states:

“Development proposals should, where appropriate, be supported by a Travel Plan assessing the impact on the Parish road infrastructure, including any mitigating measures. Development will be refused where the residual cumulative impacts of development are severe”.

7.2 Relevant Material Considerations

NHC’s Sustainability Supplementary Planning Document (SPD) (adopted on 23 September 2024) has been prepared to support policy SP1 (Sustainable Development in North Hertfordshire), policy D1 (Sustainable Design) and other relevant policies in the adopted Local Plan.

NHC declared a climate emergency in May 2019 and an ecological emergency in July 2023 and committed to *“do all reasonable in the council’s gift to aim for carbon neutrality by 2030”*. A Climate Change Strategy (2022-2027) was subsequently developed establishing a framework for action to tackle climate change in the district. The Climate Change Strategy (2022-2027) states that:

“...achieving the goals set out in this strategy will not be easy but is essential if we are to avoid an even greater impact on the lives of people across North Hertfordshire”.

Of particular relevance, Strategy Policy 2 ‘Enabling Carbon Savings’ states that NHC are:

“...seeking to provide leadership and support for both businesses and residents to switch to renewable energy, and to adapt to the impacts of planning projects. The council can play an important role as local planning authority, in reducing carbon emissions and providing further supplementary planning guidance to encourage more sustainable development and work towards carbon neutrality. This is especially important given the strategic amount of growth planned in the district...”



7.2.1 National Policy Statements

National Policy Statements (NPSs) set out the Government's policy for the delivery of significant infrastructure and provide the legal framework for planning decisions for major infrastructure projects. NPSs undergo a process of public consultation and parliamentary scrutiny before being designated. They provide the framework within which Examining Authorities make their recommendations to the Secretary of State.

The NPSs were originally implemented in 2011, however have since been subject to a number of revisions and updates. In November 2023, the government published revised versions of the NPS documents in reflection to the March 2023 consultation on the draft statements. Since publication, the guidance was updated in January 2024 and in through this update it has come into effect. It is expected that the statements will be reviewed every five years, which will ensure that they reflect evolving policy and legislative changes.

NPSs include the UK Government's objectives for the development of NSIPs in a particular sector, and set out:

- How these objectives will contribute to sustainable development;
- How these objectives have been integrated with other UK Government policies;
- How actual and projected capacity and demand have been taken into account;
- Relevant issues in relation to safety or technology;
- Circumstances where it would be particularly important to address the adverse impacts of development; and
- A clear framework for investment and planning decisions.

There are 12 designated NPSs which set out guidance on different types of national infrastructure development including energy; the most relevant to this application include the following:

- Overarching National Policy Statement for Energy (EN-1);
- National Policy Statement for Electricity Networks Infrastructure (EN-5).

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

EN-1 sets out national policy for energy infrastructure and has the effect, in combination with the relevant technology specific NPSs, of providing the primary basis for decision making under the Planning Act 2008. The statement provides the primary basis for decisions on applications for nationally significant energy infrastructure.

Paragraph 3.3.25 states:

"Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated."



Paragraph 3.3.26 states:

“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. There is currently around 4GW of electricity storage operational in GB, around 3GW of which is pumped hydro storage and around 1GW is battery storage.”

7.2.1.2 National Policy Statement for Electricity Networks Infrastructure (EN-5)

EN-5 is the primary basis for decisions on applications for electricity networks infrastructure defined as aboveground electricity lines of 132kV and above, or other infrastructure for electricity networks that is associated with an NSIP.

Paragraph 1.1.1 states:

“The security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.”

7.3 Other considerations

7.3.1 National Fire Chiefs Council (NFCC) Planning Guidance, November 2023

The NFCC published its guidance ‘Grid Scale Battery Energy Storage System planning – Guidance for FRS’ (fire and rescue service) in November 2023. While they are not statutory consultees, the NFCC encourages engagement with local Fire and Rescue Services (FRS) throughout the planning process. Its guidance aims to reduce and manage risks as far as reasonably practicable. It offers operators suggestions for their emergency plans, designs, site access, suppression systems, and water supplies.

During 2024 the NFCC published ‘Draft Guidance on Grid Scale Battery Energy Storage Systems (BESS)’ to seek views from fire and rescue services. The final revised version of the BESS guidance is expected to be published in later in 2025. In the meantime, the November 2023 version of the BESS guidance remains current.



8.0 Planning Assessment and Technical Considerations

8.1 Introduction

This Section of the PDAS assesses the proposal against the relevant policies from the Development Plan whilst also taking into consideration any other relevant material considerations which have been outlined in Section 7 of this PDAS.

The relevant key issues associated with the proposal include the following:

- Principle of the development.
- Climate change and sustainability.
- Green Belt 'Very Special Circumstances' case.
- Landscape and visual impact.
- Noise
- Ecology and biodiversity.
- Archaeology and heritage.
- Trees.
- Drainage.
- Access and construction traffic.
- Public health and safety – fire risk.

8.2 Principle of Development

Battery storage schemes that provide standby power generation and frequency balancing services are **key ancillary developments to renewable energy generation**, both locally and nationally. They facilitate greater penetration of intermittent renewable energy generation onto the grid network. In the transition to a low-carbon economy, the generation of low-carbon and renewable energy will require increased provision of standby generation and fast reserve generation to ensure security of supply.

The Applicant's portfolio of battery projects will make a significant contribution to decarbonising the electricity generation sector. As set out in this PDAS, there is both international and national policy support for proposals that assist the UK's transition to a low-carbon future. The battery storage facility will reduce the national grid's reliance on coal and gas, enabling it to support the increased generation of renewable and zero-carbon energy.

As highlighted in section 1.3, at a national level, there is government support in the form of National Policy Statements, the NPPF, the National Infrastructure Strategy, the British Energy Security Strategy, and the National Decarbonisation Strategy. These policies and strategies actively support developments that assist in the transition to a low-carbon future. The National Grid Future Energy Scenarios and NESO's 'Clean Power 2030' document project a significant demand for energy storage projects over the next two decades. Additionally, key adopted local development plan policies support the principle of this development.

NHC's Local Plan provides a positive policy framework for sustainable development and renewable energy projects. **Policy SP1** encourages sustainable development, while **Policy NE12** supports renewable energy schemes where the benefits in terms of low-carbon energy generation potential outweigh any harm or loss of environmental and social considerations. Commercial-scale batteries connected to the national grid are essential ancillary infrastructure for existing and future renewable energy development and operation.



For these reasons, the principle of development is considered to be acceptable, subject to other policy considerations.

8.3 Climate Change and Sustainability

Policy SP11 (natural resources and sustainability) and **Policy NE12** (renewable and low carbon energy development) of the North Hertfordshire Local Plan highlight that support will be given to renewable and low carbon energy developments, subject to an assessment of their impacts (provided in the sections below). This reflects NHC's ambitious target of becoming carbon neutral by 2030 and encouraging more renewable energy projects to be installed across North Hertfordshire outlined in their Climate Change Strategy (2022-2027). For the electricity network to operate at its full potential, it needs to be able to store more renewable energy generated in North Hertfordshire.

The installation of the battery facility and cabling at Wymondley will provide infrastructure needed to support an important grid balancing mechanism, facilitating greater integration of renewables into the electricity supply mix. Grid-scale batteries across the UK will progressively store more energy generated by intermittent renewable energy sources, ensuring that a greater proportion of energy supply and demand is met from sustainable renewable sources.

The Applicant's choice of site reflects sustainable development principles as environmental considerations were built into the environmental sieving process. Section 2 of this PDAS provide details of the strategic and local site selection criteria, as does the *Sequential Assessment and Alternative Sites Assessment* (Appendix A). The site is close to Wymondley National Grid Substation and associated electricity infrastructure. This development will not adversely impact the landscape, historic, or ecological areas. Careful design and management will minimise any noise or traffic impacts on local communities and new planting on the site will deliver more than a 10% BNG as outlined further below.

The site is currently used as pasture and has a Grade 3 Agricultural Land Classification. Aside from the Green Belt designation (further discussed in Section 8.4 below), it has no landscape designations. It is located near the Wymondley substation, from where power will be transferred from and to the grid.

Given the considerable benefits the proposal will provide in addressing the impacts of climate change and assisting with the transition to a low carbon future, and the sustainable location, it is clearly demonstrated that there is policy support in principle for the proposed battery facility.

8.4 Green Belt and 'Very Special Circumstances' Case

It is acknowledged that under **Paragraph 152** of the NPPF, the proposed development would constitute 'inappropriate development' in the Green Belt and that a VSC case needs to be demonstrated to justify any harm to the Green Belt. However, with specific regard to renewable energy schemes, the NPPF also acknowledges, at **Paragraph 160**, that VSCs may include the wider environmental benefits associated with increased production of energy from renewable sources.

The LVApp includes a Green Belt Statement (GBS) at Appendix 4 and concisely describes the landscape and visual impacts of the proposed development against the five purposes of the Green Belt as defined at NPPF **Paragraph 143**: preventing urban sprawl, preventing towns from merging, safeguarding the countryside, preserving the setting of historic towns, and assisting in urban regeneration.

The GBS concludes that the proposed development would not contribute to urban sprawl or the merging of towns, as it is situated within a small field already influenced by existing energy infrastructure, e.g. pylons and overhead cables. The site is well-contained by



surrounding roads and vegetation, which would help integrate the development into the landscape. The proposed development would occupy only part of the field, with the southern half remaining largely unaltered, and new planting would enhance the green infrastructure over time. The site does not contribute to the setting of any historic towns, so the proposed development would not affect this Green Belt purpose. Overall, the GBS concludes that the BESS development can be accommodated within the Green Belt without significantly harming its openness or conflicting with its purposes.

The considerations weighing in favour of the VSC case for the proposal include:

- As outlined in Section 1.3 batteries are a critical component of the UK's renewable energy infrastructure as they provide essential balance and flexibility to the transmission and supply grids to support the expansion of intermittent renewable energy generation. The proposal's contribution towards meeting the national need for renewable energy in order to deliver the net zero commitment enshrined into law through the Climate Change Act. This is afforded **significant** weight.
- While not a direct benefit of the proposal, the 'Sequential Assessment and Alternative Sites Appraisal' report (Appendix A) demonstrates that there are no suitable alternative sites that are not within the Green Belt within 2km of Wymondley Substation. The alternative sites appraisal therefore only included other Green Belt sites. In summary, a Green Belt location is deemed essential in this instance. This consideration should be given **significant** weight in the overall balancing exercise.
- There are biodiversity net gains directly associated with the proposal. This equates to: a net increase of 4.56 Area Habitat Units and 2.24 Hedgerow Units against the baseline, and therefore a biodiversity net gain of 27.02% for Area Habitats and 31.14% for Hedgerows. This far exceeds the mandatory 10%. As such, it should be afforded **substantial** weight.
- The proposal would be decommissioned following 30-years, with the right to extend a further 15 years. At this point, the new planting would have matured and will enhance the wider landscape. This landscape and visual benefit following decommissioning of the proposal should be afforded **moderate** weight.

In conclusion, the harm to the Green Belt is clearly and demonstrably outweighed by the considerations set out above. Therefore, VSCs exist, and the granting of planning permission can be justified from a Green Belt policy perspective.

8.5 Landscape & Visual

Policy NE2 of the NHC Local Plan emphasises that development should respect the sensitivities of the landscape character area. It requires proposals to avoid unacceptable harm to the area's character and appearance, ensure the health and retention of important landscape features, and consider the long-term management and maintenance of landscaping. **Policy D1** further emphasises that development proposals should respond positively to the site's local context, retain existing vegetation, and propose appropriate new planting.

The site is located within Landscape Character Area (LCA) 215 (Wymondley and Titmore Green). The impact of the proposed development on the existing landscape has been assessed in the LVApp submitted with the planning application. The LVApp evaluated the impact on landscape features, qualities, and characteristics within the site and the wider surrounding landscape during construction, at year 1 of operation, and at year 10 of operation. The findings concluded that the proposed development would alter the character of the site's northern half with the addition of the BESS development, infrastructure, and planting, while the southern half would remain largely unchanged. During construction, impacts on landscape characteristics ranged from moderate adverse to negligible, noting



that activities would be perceived in the context of nearby roads and existing energy infrastructure. By years 1 and 10, adverse effects would lessen. Key features like field patterns, hedgerow boundaries, and sense of enclosure would be retained and enhanced with new planting. Over time, the development would integrate into the landscape, softening its presence.

The LVApp concluded that the proposed development would have moderate adverse visual effects for nearby residential properties during construction, reducing to moderate-minor adverse at year 1 and minor adverse by year 10 due to new planting. For users of the Hertfordshire Way LDFP, effects would be moderate-major adverse during construction and year 1, reducing to moderate adverse by year 10 as planting matures. Beyond 1km, effects would be minor adverse during construction and negligible by year 10. Users of the footpath network southeast of the site would experience minor adverse effects during construction, reducing to negligible by year 1 and year 10. Local road users would see minor adverse effects during construction and year 1, remaining minor adverse by year 10. Overall, the most adverse visual effects would occur close to the site, reducing with distance and as planting establishes.

Consequently, the landscape accords with NHC Local Plan **Policy D1** in terms of appropriate retention of existing vegetation and new planting, as well as **Policy NE2** in terms of landscape principles and the layout and design of the development.

8.6 Noise

The NHC Local Plan **Policy D3** states that planning permission will be granted for development proposals that do not cause unacceptable harm to living conditions. The Local Plan further explains that all development has the potential to adversely impact its neighbours in various ways. Such harm may arise from traffic generation, parking, loss of daylight and sunlight, noise, overlooking, pollution (including light pollution), and dominance, among other issues. **Policy NE12** states that Renewable and Low Carbon Energy Development will be permitted subject to an assessment of the amenity of residents. **Paragraph 187(e)** of the NPPF states that planning decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water, or noise pollution, or land instability.

In support of the application, a Noise Impact Assessment (NIA) has been carried out for the site. A summary of the assessment is provided below.

The assessment considers the potential noise generation from the plant associated with the Proposed Development, with respect to existing sound levels in the area. The assessment methodology contained in British Standard 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' has been used.

The prevailing noise conditions around the site were determined by an environmental noise survey conducted during both daytime and nighttime between Thursday, 23 May 2024, and Tuesday, 28 May 2024.

With the inclusion of the noise attenuation kit (which would be installed with the battery units), the assessment identifies that the proposed development is predicted to generate rating sound levels that do not exceed the measured background sound level in the area. As a result, no additional noise mitigation measures (other than the noise attenuation kit) are proposed, as it is deemed that there is a low likelihood of adverse effects on the surrounding environment, including the nearest residential receptors, during both daytime and nighttime.

In addition to the NIA, the Applicant has prepared a Construction Traffic Management Plan (CTMP) which will provide control over all aspects of the construction phases for the



proposed development. The Applicant is accountable for the contents of the CTMP, ensuring robust measures are in place to protect amenity and the local road network.

No other operational impacts on amenity (including air quality and light pollution) are anticipated as a result of the proposed development. Therefore, the proposed development will not result in any detrimental impact on local amenity and accords with the provisions of **Paragraph 187(e)** of the NPPF and NHC Local Plan **Policies D3** and **NE12**.

8.7 Ecology and Biodiversity

Paragraph 193 of the NPPF states that planning permission should be refused if significant harm to biodiversity cannot be avoided, adequately mitigated, or (as a last resort) compensated for. **Paragraph 194** sets out that projects that would be likely to have a significant effect on habitats sites (Special Protection Areas (SPA), Special Area of Conservation (SAC), and Ramsar sites) should be subject to appropriate assessment. It explains that the presumption in favour of sustainable development would not apply unless the assessment has concluded that the project would not adversely affect the integrity of the habitats site.

NHC Local Plan **Policies NE4, NE8, and NE12** collectively aim to protect, enhance, and manage biodiversity, delivering measurable net gains and contributing to ecological networks. The Wymondley Parish Neighbourhood Plan strengthens this commitment with policies like **NHE2 Biodiversity** and **NHE6 Bats**, requiring bat surveys for development proposals impacting bat movement corridors.

An EcIA submitted with this application identifies no statutory designated sites within 2km of the Site. However, there are 14 Local Wildlife Sites (LWS) within this range, including one on the National Grid Wymondley Substation (referred to as Wymondley Transforming Station in the EcIA). For a full list of LWS within the development's zone of influence, please refer to Table 3 in the EcIA. The EcIA considers the Wymondley Transforming Station LWS as the only site potentially directly impacted by the proposal, as the proposed cable route traverses its designated habitats.

NHC Local Plan **Policies SP12 and NE4** require protection of locally designated sites. The Wymondley NG substation is a LWS and paragraph d) of **Policy NE4** specifies a requirement for a 12-metre buffer and new complementary habitat around LWSs. The proposed cable route has been designed to minimise any impacts, using directional drilling where possible. Due to the temporary nature of the works, the policy requirement for 12 metres of new complementary habitat around this LWS is deemed unnecessary and disproportionate to the impacts. The EcIA concludes any potential impacts to the Wymondley Transforming Station LWS would be minor adverse at the local level.

The site supports locally and naturally common habitats. For a full list of identified ecological features, including habitats, see Table 3 in the EcIA. The EcIA identifies badgers, bats, hazel dormouse, breeding birds, reptiles, great crested newts and common toad to be ecological features with the potential to be indirectly impacted by the proposed development. Impacts would be mitigated through implementation of the EcIAs recommendations. The proposed development follows the mitigation hierarchy to avoid, minimise, mitigate, or compensate for impacts on important ecological features. Table 9 in the EcIA lists all mitigation and enhancement measures, including using an attenuation pond/bioswale to prevent overflow and damage to Lawn Pond, supplementary planting, reinstating disturbed ground, planting replacement native trees, using HDD where practicable, careful management of open trenching, and maintaining a 10m buffer from BESS to woodland.

The proposed development includes measures for habitat creation and enhancement, such as improving modified grassland, creating a bioswale in 'Good' condition, enhancing native hedgerows, creating scrub in 'Moderate' condition, and planting 27 individual trees. A detailed method statement for these actions is outlined in a 30-year Habitat Management



and Monitoring Plan (HMMP), to be submitted with a Biodiversity Gain Plan (BGP). The HMMP will include a schedule of works, monitoring requirements, and remedial actions to ensure target delivery.

The proposed development has carefully considered the ecological context and has sought to avoid any impacts on habitats and features and provide enhancements where possible. Following the implementation of the designed-in and residual mitigation measures, set out in the EclA, no significant adverse residual ecological effects are identified. The proposal is therefore in accordance with **Paragraphs 193** and **194** of the NPPF, **Policies NE4, NE8, and NE12** of the NHC Local Plan and **Policies NHE2 and NHE6** of the relevant Neighbourhood Plan.

8.7.1 Biodiversity Net Gain

BSG Ecology has evaluated biodiversity performance and produced a BNG Assessment (as part of the EclA) and an accompanying Metric 4.0 Calculator for the proposed development.

The BNG calculations reflect the habitat improvements discussed above. The proposed development will result in a net increase of 4.56 Area Habitat Units and 2.24 Hedgerow Units against the baseline, and therefore a biodiversity net gain of 27.02% for Area Habitats and 31.14% for Hedgerows. Overall, the biodiversity improvements align with local and national planning policy, which requires a BNG of at least 10%.

In summary, the proposed development accords with **Paragraphs 187(d)** and **193(d)** of the NPPF and the **Policy NE4** of the NHC Local Plan as it will protect and enhance assets of natural value and incorporate biodiversity creation and enhancement measures.

8.8 Archaeology and Cultural Heritage

NPPF **Paragraph 207** requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. At a minimum, the relevant historic environment record should be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site proposed for development includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

NHC Local Plan **Policy NE12** supports renewable and low-carbon energy development, subject to an assessment of the historic environment and the impact on historic assets. Local Plan **Policy SP13** emphasises the importance of conserving designated heritage assets and managing their settings. Local Plan **Policy HE3** states that proposals that may harm or result in the loss of non-designated heritage assets will be permitted, provided a balanced judgment is made regarding the loss of significance. Additionally, Local Plan **Policy HE4** requires developers to submit a desk-based assessment for developments affecting heritage assets with archaeological interest. **Policy NHE9** of the Wymondley Parish Neighbourhood Plan reinforces the aforementioned Local Plan policies.

The Historic Environment Desk-Based Assessment (HEDBA) submitted in support of this application confirms that the proposed development will not impact any designated heritage assets or conservation areas, with no designated heritage assets located within the Site. Furthermore, the HEDBA confirms that the proposed development is not anticipated to materially impact upon the significance of any designated heritage asset within the area as a result of a change in setting.

The HEDBA identified known and anticipated archaeological remains within the Site, assessed in accordance with NPPF (2024) **Paragraph 207**. Potential remains include prehistoric findspots, Iron Age/Romano-British activity, and medieval or post-medieval agricultural activity. However, no remains of high importance are expected. Any remains



present would likely be of local or regional interest at best. Therefore, it is unlikely that archaeological remains within the Site would preclude development or require preservation in-situ. Any adverse effects to such assets should be weighed in the balance under the terms of the NPPF **Paragraph 216**.

To conclude, there is anticipated to be no significant adverse effects on any designated or non-designated heritage assets or their setting, and the proposed development is therefore considered to accord with the NPPF and NHC Local Plan **Policies NE12, SP13, HE3, HE4**, as well as **Policy NHE9** of the Wymondley Parish Neighbourhood Plan.

8.9 Trees

NPPF **Paragraph 187(b)** states that planning decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services, including the economic and other benefits of trees and woodland. As discussed above, NHC Local Plan **Policy NE4** further outlines that development proposals should appropriately protect, enhance, and manage biodiversity.

An Arboricultural Impact Assessment (AIA) and Tree Protection Plan have been completed and submitted in support of this application. The AIA confirms that there will be no requirement for any tree removal to facilitate the current design layout of the proposed development. However, two trees (T90 and T91) (Category U) will require removal on arboricultural grounds due to their moribund condition. Given the limited long-term useful life expectancy of both trees, their loss should not be considered a constraint in this instance.

Sufficient space and adequate protection measures have been established to ensure that retained trees are not damaged during the pre-construction and construction phases, enabling their successful development post-construction. Retained tree protection measures are discussed throughout the AIA and illustrated on the Tree Protection Plan appended to the AIA.

Several trees and tree groups will be subject to construction and/or incursions within their Root Protection Areas. Special measures are recommended to ensure that these trees are not damaged (e.g., use of a 3D cellular confinement system, hand trenching, temporary ground protection, and monitoring by the Arboricultural Clerk of Works (ACoW)). The special measures are detailed in Section 4.4 of the AIA and are illustrated on the Tree Protection Plan appended to the AIA.

The Applicant anticipates that an Arboricultural Method Statement (AMS) can be secured as a condition of any planning permission. The AMS will set out the methodology for specific activities taking place near retained trees.

This approach accords with NPPF **Paragraph 187(b)** and NHC Local Plan **Policy NE4**, ensuring that the development contributes positively to the natural and local environment by protecting and enhancing biodiversity and the benefits provided by trees and woodland.

8.10 Flood Risk and Drainage

Policy NE7 of the NHC Local Plan and **Paragraph 181** of the NPPF requires that a Flood Risk Assessment (FRA) be prepared for any development in Flood Zone 2 or 3, or over 1ha. As a result, an FRA and Surface Water Drainage Strategy have been prepared for the proposed development and submitted with this planning application.

Policy SP11(b) of the NHC Local Plan and **Paragraph 170** of the NPPF states that development should be avoided where it increases flood risk and development should be directed to areas at least risk of flooding. **Paragraph 187(e)** of the NPPF and **Policies NE7, NE9** and **NE10** of the Local Plan outlines those developments should not result in an unacceptable risk from water pollution.



The Site is located in Flood Zone 1. The FRA submitted in support of this application concludes that the proposed development will not increase the risk of flooding on or off the Site. The assessment concluded that there are no significant flood risks at the site, making it suitable for development according to the Exception and Sequential Tests. Consequently, allowances for changes in peak river flows, sea levels, wind speed, and wave height are not required. However, in line with national policy, the development must account for a 40% increase in peak rainfall due to climate change over the next 40 years, which has been incorporated into the Surface Water Drainage Strategy (SWDS).

The Surface Water Drainage Strategy prepared for the proposed development considers that any flood risk associated with the proposed development has been successfully addressed. An assessment of ground conditions has confirmed that infiltration is not possible, therefore the drainage strategy proposes to use a gravel compound over the undeveloped site areas. Water from the gravel compound will be directed into a swale for additional attenuation and filtration before being discharged into the existing pond at a controlled rate of 1 litre per second. The pond discharges to an existing ditch and culvert below Stevenage Road which takes surface water to a ditch. Sustainable Drainage Systems (SuDS) are designed to manage stormwater for events up to the 1% Annual Exceedance Probability (AEP) with a 40% allowance for climate change.

To conclude the proposed scheme does not have an impact on flood risk on or off site. The drainages scheme makes use of SuDS components, with attenuation to be provided by a swale, ensuring that the proposed development does not increase flood risk on or off site. This will demonstrate accordance with **Policies NE7, NE9, NE10 and SP11(b)** of the NHC Local Plan, and **Paragraphs 170, 181, 187(e)** of the NPPF.

8.11 Transport and Traffic

Both national and local policy direction clearly state that development should only be refused on highways grounds if it poses an unacceptable impact on highway safety or severe cumulative impacts on the road network, as outlined in NPPF **Paragraph 116**, NHC Local Plan **Policy T1**, and Wymondley Parish Neighbourhood Plan **Policy TM1**.

The Proposed Development will be accessed via an existing access from Stevenage Road, with a construction compound for the cable route works (HDD plant and pit) located in the field east of Blakemore End Road. Access to the wider network is available via Stevenage Road and Blakemore End Road, which connect to Stevenage Road in the north. Stevenage Road links to the A602, providing access to the A1(M).

An Outline CTMP has been prepared to support the application, and we would expect a full CTMP to be a condition of any planning permission. This outline CTMP is the first stage of the requirement to manage and control all related traffic activity during the construction phase of the development. It is to be used during the construction phase of the development and updated as necessary, acting as a 'live' document to ensure it is always current. Where the document is updated, it will clearly be noted as a variation.

The CTMP will ensure a suitable means of access to the site for construction vehicles and provide a compound within the site to accommodate all traffic movements related to the works. It will also determine an appropriate route to and from the site and the hours of operation to control and manage the traffic impact of construction traffic associated with the development.

The CTMP will provide a strategy for managing construction-related traffic and minimising interaction between the public and construction traffic. These measures will reduce disruption and maintain safe and efficient traffic flow, ensuring the development proceeds without compromising road safety. The design measures will retain and enhance future accessibility to, from, and adjacent to the Proposed Development, ensuring minimal impact once operational. The surrounding transport network will not be affected by the introduction



of the Proposed Development, and its enhanced access will be upgraded to a Direct Access in line with the requirements of the NHC Local Plan.

Therefore, it is considered that there are no transport or traffic reasons for this development not to progress in line with the provisions of NPPF **Paragraph 116**, NHC Local Plan **Policy T1**, and Wymondley Parish Neighbourhood Plan **Policy TM1**.

8.12 Public Health and Safety

The Applicant takes fire risk very seriously and is actively involved in ongoing engagement with local fire and rescue services across the UK to ensure best practice is adhered to and to ensure the ongoing development of better fire mitigation measures over time.

As mentioned in Section 2.5 of this PDAS, the Applicant has been engaging with Herts Fire and Rescue Service (Herts FRS) on an ongoing basis. Based on the NFCC Guidance 'Grid Scale Battery Energy Storage Systems Planning – Guidance for FRS' (2023) and consultations with Herts FRS, the Applicant has prepared an Outline Battery Safety Management Plan (BSMP) which is submitted with the planning application.

The Outline BSMP ensures the integration of advanced fire detection and suppression technologies, operational protocols, and mitigation measures to alleviate potential fire risks associated with the BESS. The current version of the Plan confirms that the site layout is designed to minimise impacts from a fire event and ensure accessibility for emergency vehicles throughout the site. It also recognises the potential environmental impact and obligations related to design and fire water runoff, incorporating measures to reduce such risks. A key measure includes the installation of a penstock and interceptor within the drainage system to prevent contaminated water from entering Lawn Pond or other local watercourses.

The Outline BSMP will be a 'living document,' continuously reviewed and updated to incorporate emerging technologies and evolving industry standards, ensuring the BESS operates safely while contributing to the UK's decarbonisation goals and future energy resilience.

The Applicant expects a condition requiring that a revised Detailed BSMP be submitted to and approved by the LPA before the first commercial operation of the BESS. This Statement will include details of the fire suppression systems to be incorporated into the site. The Detailed BSMP will also demonstrate consideration of best practice measures and guidance on the risks associated with battery storage, as outlined in publications by both the NFCC and the Fire Protection Association. Thereafter, the Detailed BSMP shall be implemented and adhered to in perpetuity.

The proposals comply with **Policies D3** and **NE12** of the NHC Local Plan, as they minimise risks associated with the operation of the BESS and ensure there will be no deterioration in water quality or watercourses. The installation of a penstock and interceptor within the overall proposed drainage system would prevent contaminated water from entering Lawn Pond or other local watercourses.



9.0 Summary and Conclusions

The proposed Wymondley BESS project aligns with the national drive to increase renewable energy generation, which is crucial for the electrification of the energy, transport, and industry sectors. The UK government has set ambitious targets to achieve net zero carbon emissions by 2050, as outlined in the British Energy Security Strategy (2022) and the National Infrastructure Strategy (2020). These strategic documents emphasise the need for substantial investments in renewable energy and supporting infrastructure, such as BESS, to ensure a stable and resilient energy supply.

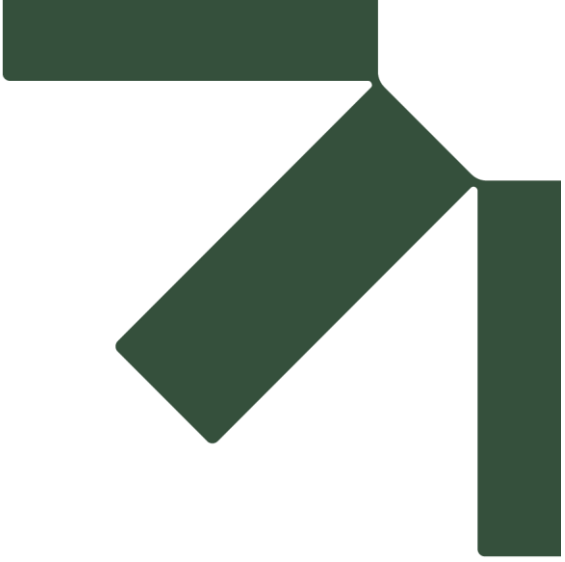
BESS are critical ancillary infrastructure that provide essential services such as frequency regulation, voltage control, and backup power, which are vital for integrating renewable energy into the grid and maintaining its stability. The proposed Wymondley BESS will play a significant role in enhancing reliability and efficiency of the local and national grid, supporting the broader transition to a low-carbon economy.

Furthermore, the project is in alignment with North Hertfordshire Council's declaration of climate emergency and its commitment to becoming carbon neutral by 2030. The Council's Climate Change Strategy 2022-2027 underscores the importance of local renewable energy projects in achieving these goals. By facilitating the integration of renewable energy and providing critical grid services, the Wymondley BESS project directly supports the Council's climate objectives and demonstrates a proactive approach to addressing the climate crisis.

The planning application is supported by several technical studies, including: a Sequential Assessment and Alternative Sites Appraisal; an outline Battery Safety Management Plan; an Arboricultural Impact Assessment; an outline Construction Traffic Management Plan; a Historic Environment Desk Based Assessment; an Ecological Impact Assessment (incorporating BNG Assessment); a Biodiversity Metric Calculator; a Flood Risk Assessment and Surface Water Drainage Strategy; a Landscape and Visual Appraisal; and a Noise Impact Assessment. The proposals are designed to protect biodiversity where practicable and enhance biodiversity value. All assessments conclude that there will not be any unacceptable adverse environmental impacts.

On balance, it is concluded that Very Special Circumstances have been clearly demonstrated that outweigh any potential harm to the Green Belt. The environmental and social benefits delivered by this proposal are sufficient to positively outweigh the temporary construction impacts and limited operational impacts. The Council is therefore respectfully requested to approve this planning application at the earliest opportunity.





Appendix A Sequential Assessment and Alternative Sites Appraisal



Sequential & Alternative Sites Appraisal

Wymondley BESS Site Search

Pivoted Power LLP (part of EDF Energy Renewables Ltd)

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SLR Project No.: 402.065238.00001

14 April 2025

Revision: 01

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	14 April 2025	Brenna Sherson / Jennifer Gordon	Jennifer Gordon	Adrian French

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Pivoted Power LLP (part of EDF Energy Renewables Ltd) (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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Executive Summary

SLR Consulting Ltd was engaged to support Pivoted Power LLP (part of EDF Energy Renewables Ltd) in 2023 to provide support with an early site selection exercise for a Battery Energy Storage System (BESS) in the vicinity of Wymondley National Grid (NG) Substation. Pivoted Power LLP has secured a 57MW connection offer into Wymondley Substation from National Grid.

The sequential assessment (SA) and alternative sites appraisal (ASA) for the BESS development at Wymondley have been undertaken with thorough consideration of various constraints and opportunities. The methodology, developed by SLR Consulting Ltd with input from EDF-R and a commercial land agent, involved a detailed three-stage process: sieving environmental constraints, conducting a sequential assessment, and performing an ASA.

The only wholly unconstrained sites within 2km of Wymondley Substation are either too small or are constrained by other environmental / technical issues, which includes the Green Belt designation.

The alternative sites assessment therefore only included other Green Belt sites. Despite the extensive search, only ten sites were shortlisted from the 51 assessed, with an additional site considered but later withdrawn due to flood risk considerations.

Site No. 21 was selected as the most appropriate site for the BESS development based on the final RAG assessment process. This site was deemed to have acceptable access, topography, and distance to the point of connection (PoC) for cabling. It is well screened and over 150m from the nearest residential property. The site is bounded by the A602 dual carriageway to the north, Stevenage Road and Chantry Lane to the south and east, and contains several pylons with overhead cables, making it relatively contained.

The comprehensive assessment and selection process demonstrate that Site No. 21 is the most viable option for the BESS development, considering the constraints and requirements. This supports the case for Very Special Circumstances (VSC) necessary for development within the Green Belt, aligning with the wider environmental benefits associated with battery storage and renewable energy projects.



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Appendix A Constraints Plans

Appendix B Sequential Plans

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Appendix D Assessment Table



Acronyms and Abbreviations

ASA	Alternative Sites Appraisal
BESS	Battery Energy Storage System
EDF-R	EDF Energy Renewables Ltd
HGV	Heavy Goods Vehicles
LNR	Local Nature Reserve
LWR	Local Wildlife Site
NHC	North Hertfordshire (District) Council
NPPF	National Planning Policy Framework
NG	National Grid
NGR	National Grid Reference
PoC	Point of Connection
RAG	Red / Amber / Green
RIG	Regionally Important Geological Site
SAC	Special Area of Conservation
SINC	Site of Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SPD	Supplementary Planning Document
VSC	Very Special Circumstances



1.0 Introduction

SLR Consulting Ltd was engaged by Pivoted Power LLP (part of EDF Energy Renewables Ltd) in 2023 to provide support with a site identification exercise for a Battery Energy Storage System (BESS) in the vicinity of Wymondley National Grid (NG) Substation. Pivoted Power LLP has secured a 57MW connection offer into Wymondley Substation from National Grid.

Wymondley NG Substation is located within North Hertfordshire District Council's administrative area. A large proportion of the District's rural area is washed over by Green Belt designation as illustrated in Figure 1. Planning policy seeks to protect the Green Belt from inappropriate development.

This document outlines the sequential and alternative sites appraisal process used to identify the chosen BESS site. Land within 2km of the Wymondley Substation was considered.

This assessment forms part of the very special circumstances case (VSC) put forward for the proposed BESS development. It should be read alongside the Planning, Design, and Access Statement.

The report is structured as follows:

Section 2 – Planning Policy

Section 3 – Methodology

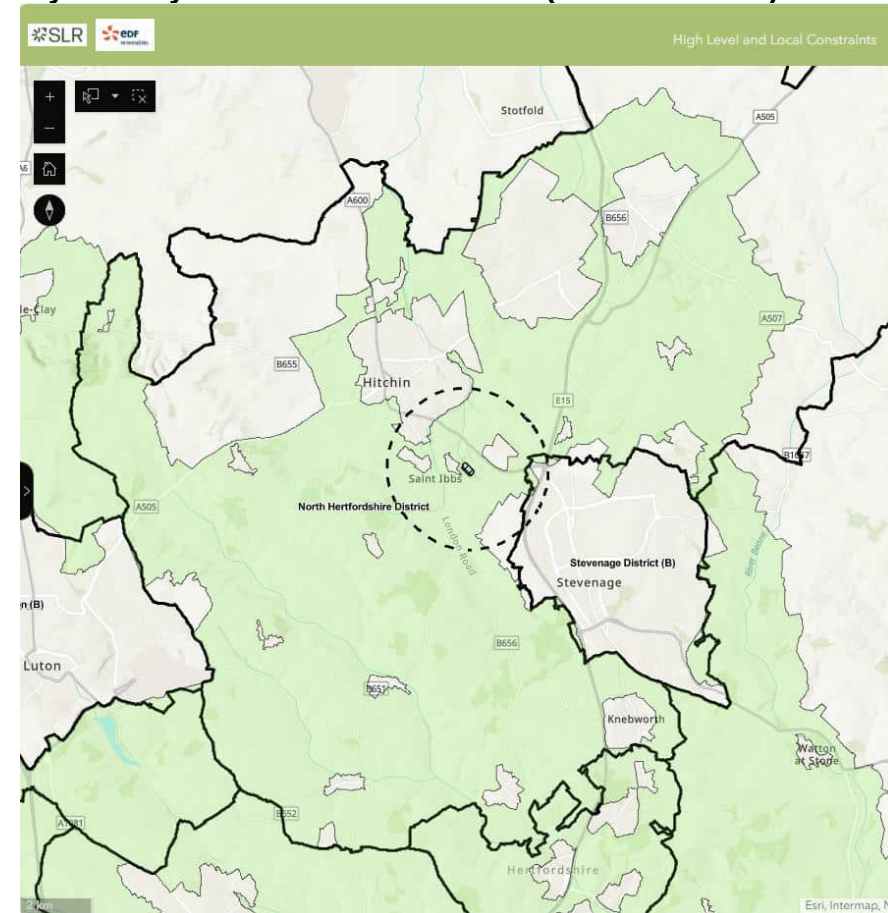
Section 4 – Sieve of Environmental Constraints

Section 5 – Sequential Assessment

Section 6 – Alternative Sites Appraisal

Section 7 – Conclusion

Figure 1 North Hertfordshire District Green Belt Surrounding Wymondley National Grid Substation (and 2km Buffer)



Extract from SLR Bespoke Web-Mapping Assessment Tool for EDF-R



2.0 Planning Policy

2.1 Green Belt Policy

2.1.1 National Planning Policy Framework (NPPF)

NPPF 2024 highlights that the Government attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The Green Belt serves five purposes, which are set out in paragraph 143 of NPPF. Key policy statements are found in:

Paragraph 153:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

Paragraph 160 is of particular relevance as it refers to renewable energy projects:

“When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”

The proposed BESS development is deemed to be ‘inappropriate development’ within the Green Belt. ‘Very special circumstances’ (VSC) will not exist unless the potential harm to the Green Belt is outweighed by other considerations.

The VSC case includes the wider environmental benefits associated with battery storage, alongside demonstration that there are no practical/available non-Green Belt (or ‘grey belt’) alternative sites.

2.1.2 The North Hertfordshire Local Plan (2011 – 2032)

The North Hertfordshire Local Plan 2011-2032 was adopted on 08 November 2022. It highlights that a large proportion of the District’s rural area is covered by Green Belt; the ‘London Metropolitan Green Belt’ (covering the Site) includes Hitchin; Letchworth Garden City, Baldock, Stevenage and nearby settlements, and the ‘Luton Green Belt’ covering the western part of the District. Relevant policies include **Policy SP5: Countryside and Green Belt**.

“the principles of the Green Belt and recognise the intrinsic value of the countryside. Green Belt and Rural Areas Beyond the Green Belt are shown on the Policies Map. We:

- a) *Have conducted a comprehensive review of the Green Belt. Land has been removed from the Green Belt to:*
 - i. *enable strategic development at the locations referred to in Policies SP8 and SP3;*
 - ii. *enable local development around a number of the District’s towns and villages; and*
 - iii. *define boundaries for villages referred to in Policy SP2 which fall within the Green Belt but were previously ‘washed over’ by this designation;*
- b) *Have provided new Green Belt to cover, in general terms, the area bounded by the Metropolitan Green Belt to the east, the Luton Green Belt to the west and the A505 Offley bypass to the north;*
- c) *Will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated; and*
- d) *Will operate a general policy of restraint in Rural Areas beyond the Green Belt through the application of our detailed policies.”*



2.1.3 Wymondley Neighbourhood Plan (June 2019)

The Wymondley Neighbourhood Plan published June 2019 further reinforces the Green Belt protection set out in the Local Plan. **Policy GB1** states:

“Development proposals impacting on Wymondley Parish must comply with Government Green Belt policy; primary consideration will be given to effective use of brown-field sites, which are not of high environmental value.

Development proposals should not impact negatively on Wymondley Parish - particularly in terms of visual impact on the openness of the Green Belt landscape and its important contribution to the character of our villages/hamlets.”

2.1.4 Sustainability Supplementary Planning Document (SPD) (September 2024)

The Sustainability SPD was adopted by the Council in September 2024 and “sets out the standards required to meet the visions, objectives and policies of the North Herts Local Plan as sustainability as possible”. It is a material planning consideration in the determination of planning applications.

Pages 38-41 provide guidance on renewable energy developments. Although the SPD does not specifically reference BESS development, it is expected that the Council will also give significant weight to the wider environmental benefits associated with their support to increasing production of energy from renewable sources, when assessing the proposals.

“Solar /PV developments should be sited where they would have the least adverse impacts. Proposals which would contribute towards reducing greenhouse gas emissions will be permitted subject to an impact assessment demonstrating that proposed schemes:

Do not harm the role and purposes of the Green Belt unless they can demonstrate very special circumstances;

Minimise impacts on the landscape character and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty;

Do not produce adverse impacts on:

- *Biodiversity sites;*
- *Air quality;*
- *The historic environment;*
- *The transport networks;*
- *Aviation interests;*
- *Landscape, quality, landscape character and visual amenity, including consideration of cumulative impacts of development;*
- *The amenity of residents.”*

The Council require all infrastructure to be removed at the end of the development's life, and the site restored to the original condition or as agreed with the Council.



3.0 Methodology

A sequential assessment and alternative sites appraisal for a BESS development at Wymondley has been undertaken. There is no standard or published best practice guidance for undertaking these assessments for BESS development. The methodology has been developed by SLR Consulting Ltd with input from EDF-R and a commercial land agent.

3.1 Search Area

A 2km search area from the Wymondley Substation has been used for the sequential and alternative sites appraisal. The justification for 2km is based on what is considered to be a feasible cable route distance to the point of connection (PoC). Beyond 2km the greater the challenge of connecting to the PoC. Challenges associated with an increased cable route length include environmental and transport considerations from construction (trees, road closures), thermal power losses and efficiency, infrastructure crossings (road, rail, services), third party land easements, all of which can significantly increase costs to make the project uneconomical.

3.2 Brownfield Land

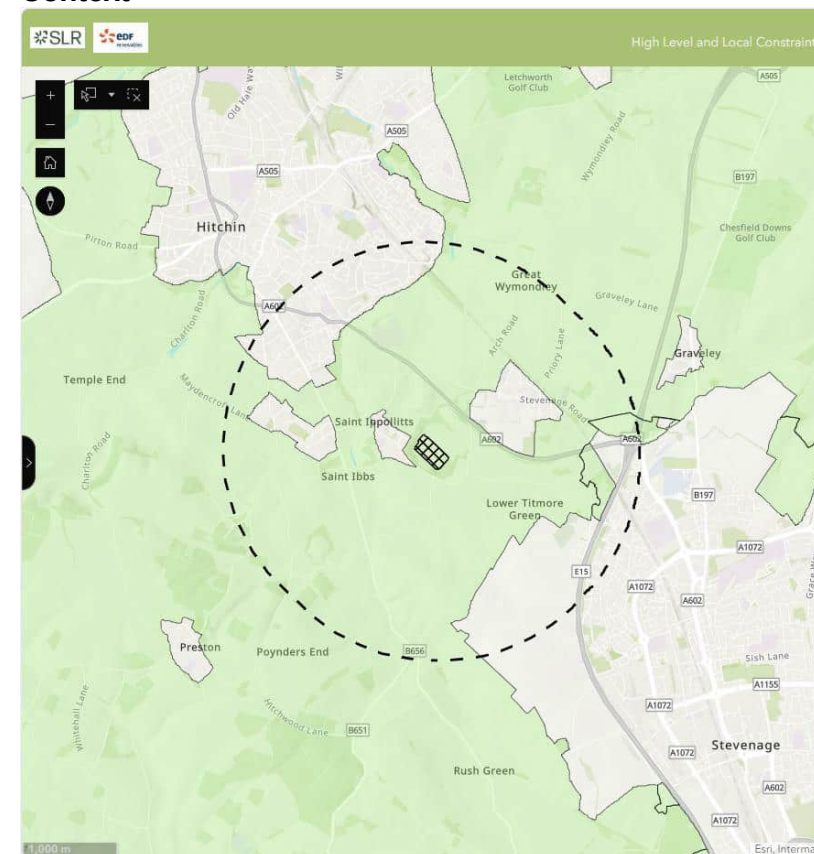
The study considered NHC's Brownfield Land Register (2023 version). The register contains only 12 sites and is primarily focussed on the identification of land for housing, therefore most of the sites were unsuitable for BESS development. Only two of the sites were over 1.6ha (minimum site area) and both had existing planning consents for residential development (Bowman's Flour Mill, Ickleford and Odyssey Health Club, Knebworth). No available brownfield sites have been found within the 2km study area.

3.3 Three Stage Process

The assessment includes a three-stage process:

1. Identify / sieve environmental constraints
2. Sequential assessment (identifying unconstrained land within and outside Green Belt)
3. Alternative Site Appraisal - identify long list of sites for appraisal using criteria

Figure 2 Wymondley Substation with 2km Buffer and Green Belt Context



Extract from SLR Bespoke Web-Mapping Assessment Tool for EDF-R



3.3.1 Identify / Sieve Environmental Constraints

Constraints data has been compiled beyond a 2km radius of Wymondley Substation for the categories listed in Table 1 below. A set of constraints plans are provided in Appendix A. The data has also been used in the bespoke web mapping assessment tool. The web platform has been used to interpret and investigate project data for the 2km study area (and beyond) including individual sites.

A traditional desk-top GIS constraints and opportunities ‘sieving’ process has been designed and undertaken to efficiently evaluate and determine the availability of unconstrained land.

Table 1 Environmental Designations and Constraints

Topic	Designations /Constraints Details
Ecology	Includes international and national designations (e.g. Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) etc.) and local designations and constraints (e.g. Local Wildlife Sites (LWS), Site of Importance for Nature Conservation (SINC), Regionally Important Geological Site (RIG) etc.), Priority Habitat, National Nature Reserve, Local Wildlife Site, Local Nature Reserve, Ancient Woodland)
Cultural Heritage	Includes international, and national designations (e.g. Listed Buildings, Scheduled Monuments, World Heritage Sites, Registered Park and Gardens etc.) and local designations and constraints (e.g. Local Cultural Heritage Assets, Conservation Areas etc.)
Landscape	Includes international, national, and landscape character areas (e.g. Country Parks, Area of Outstanding Natural Beauty (AONB), local designations and constraints (e.g. Local Landscape Designations/Allocations, Public Rights of Way etc.)

Topic	Designations /Constraints Details
Hydrological	Includes main watercourses, minor watercourses, waterbodies, EA Flood Zones from Rivers and Sea, Risk of Flooding from Surface Water etc.)
Land Use	Includes Settlement Boundary, Agricultural Land Classification, Local Planning Allocations, Air Quality Management Area, Green Belt, Rural Area beyond the Green Belt, Employment Areas, Employment Sites, Gypsy and Traveller Sites, Mixed Use Sites, Safeguarded Land, Town Centre Area Urban Open Land, Extant but not yet implemented consents, Live Planning Applications etc. Potential Sensitive Local Receptors (Derived from Open-Source Data)
Infrastructure	National Cycle Network, Public, Railway (OS Local), Open Roads (OS Local)
Land Quality	Includes current and historic landfill locations. Mineral Safeguarding Areas (from Local Plan – if available)

3.3.2 Sequential Assessment

Using the GIS constraints sieving exercise the sequential assessment considers whether alternative and available, less sensitive sites outside the Green Belt are available and evaluates the suitability of the proposed location.

3.3.3 Alternative Sites Appraisal

An alternative sites appraisal (ASA) has been undertaken within the 2km search area. Whilst there is no policy requirement to demonstrate the suitability of alternative sites, our analysis has demonstrated that whilst other land exists which has the potential to connect to the substation, none of these alternatives are considered to be more suitable from a planning and environmental perspective than the proposed site.



4.0 Identify / Sieve Environmental Constraints

Figure 3 below (also in Appendix A) illustrates all the constraints identified within 2km of Wymondley Substation. It includes recently submitted planning applications and EIA Screening Opinion Requests.

The most significant constraints highlighted include the Green Belt designation, safeguarding land (for housing) designation, settlement boundary buffers, residential property buffers and flood risk areas.

Figure 3 Constraints within 2km of Wymondley Substation



Note: The BESS planning application boundary has been added for context



5.0 Sequential Assessment

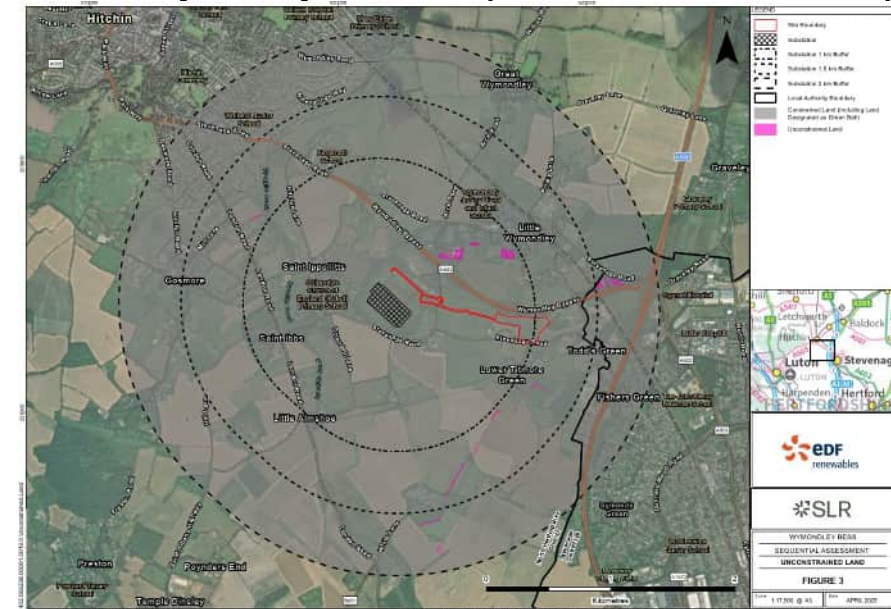
5.1 Unconstrained Land

Figure 4 identifies the land that is considered 'unconstrained' in pink. This figure illustrates that there is very limited land within 2km of the Wymondley substation that is not constrained by policy designations (mainly Green Belt designation) or environmental constraints. The 'unconstrained' pink areas are all within settlement boundaries:

- There are three parcels of land identified within Little Wymondley. None are suitable for BESS development due to proximity to residential properties.
- The parcel of land located on the northwest edge of Stevenage was released from the Green Belt and is located within Stevenage Borough Council (SBC). Shown as pink on Figure 4 and Figure 5 (an extract from the Web-Mapping Assessment tool). Figure 6 is extracted from SBC 2019 Adopted Local Plan (2011-2031) Policies Map). Parts of the land are within FZ2 and FZ3 and are not suitable for BESS development due to the flood risk and limited developable area. A site west of Chantry Lane, with similar constraints, was considered for BESS development but discounted following detailed hydrological investigations¹.

It is evident that the only wholly unconstrained sites within 2km of Wymondley Substation are either too small or are constrained by other environmental / technical issues.

Figure 4 Unconstrained Land Shown in Pink within 2km of Wymondley Substation (Green Belt land a constraint)

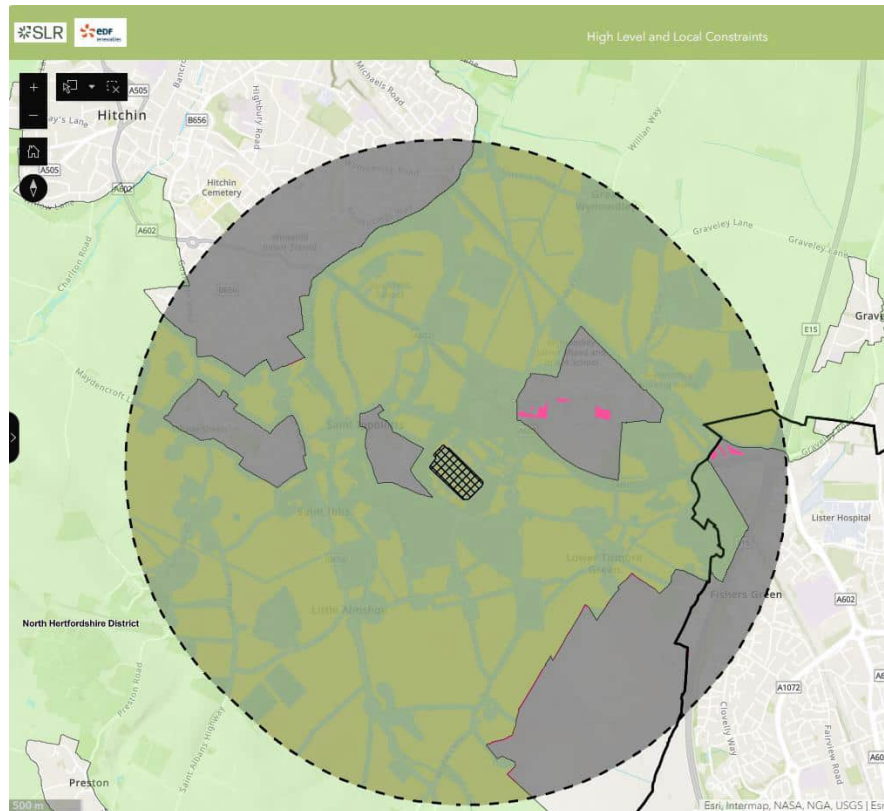


Note: The BESS planning application boundary has been added for context

¹ This is referred to as Site 'unnumbered' in the alternative sites appraisal.

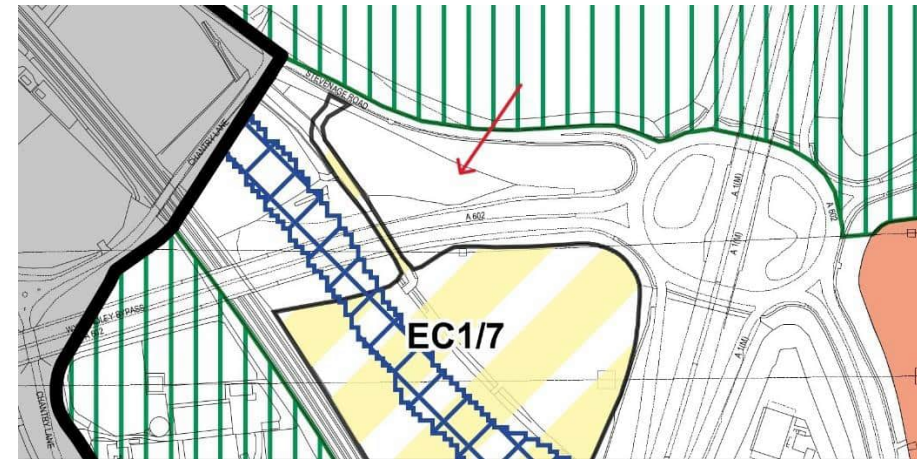


Figure 5 Unconstrained Land (Pink) within 2km of Wymondley Substation (all within the Settlement Boundaries (Grey))



Extract from SLR Bespoke Web-Mapping Assessment Tool for EDF-R

Figure 6 Stevenage Borough Council (SBC) Land Parcel Removed from Green Belt (east of Chantry Lane)



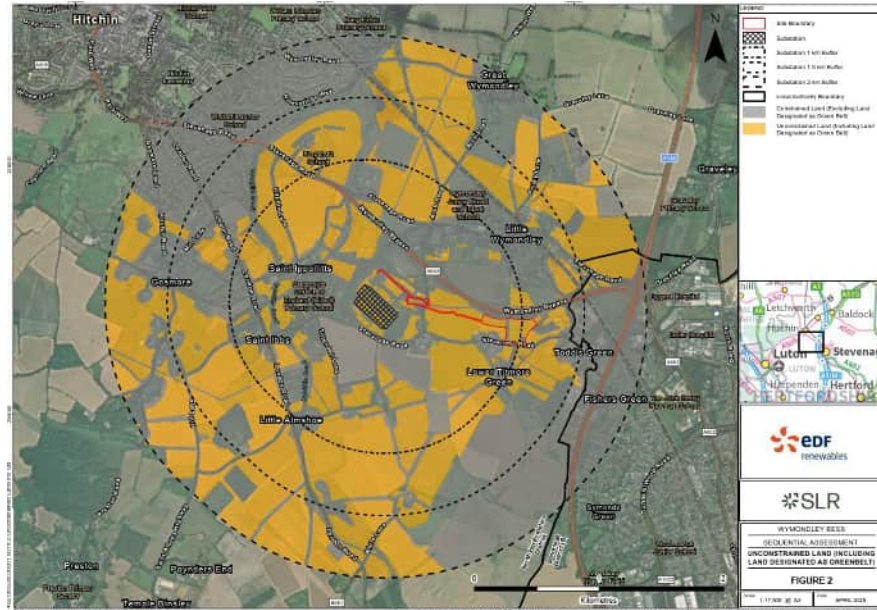
Extract from SBC 2019 Adopted Local Plan (2011-2031) Policies Map. The site shown east of Chantry Lane was partly shown as partly 'unconstrained' in the sequential assessment. This is unsuitable due to flood risk and limited developable area. Site identified as EC1/7 is allocated for 12,500m² of B8 and ancillary uses.

5.2 Unconstrained Land (excluding land designated as Green Belt)

Figure 7 identifies the land that would be considered 'unconstrained' were it not for the Green Belt designation. There are significant areas that could potentially be suitable for development, subject to a more detailed appraisal, albeit these are all located in the Green Belt. These areas were further investigated as part of the ASA exercise.



Figure 7 Unconstrained Land (including land designated as Green Belt)



Note: The BESS planning application boundary has been added for context



6.0 Alternative Sites Appraisal

6.1 Land Parcels

The next stage of the study focussed on the analysis of the 'orange' areas identified in Figure 7 (these are all sites in the Green Belt not impacted by other environmental / technical constraints). The orange areas were collated into a total of 51 individual land parcels / sites using the following criteria.

- **Site area** – The minimum site area identified was 1.6ha. This takes into consideration the need to provide biodiversity net gain on site.
- **Land ownership boundaries** – These were used to help identify land parcels and were generally consistent with other physical boundaries such as hedgerows, roads or watercourses.

The large number of sites reflects the very conservative 50m buffer applied around urban areas and residential properties. In practice, generally a much larger buffer is typically required. Judgements on acceptable distances to residential properties are made for each land parcel, with a distance of 150m often considered generally acceptable. Using a 50m buffer allows for all potential sites to be considered.

Figure 8 Alternative Sites Showing 50m Buffer from Residential Properties and Urban Areas



Extract from SLR Bespoke Web-Mapping Assessment Tool for EDF-R



6.2 Site RAG Appraisal

Each land parcel / site has been assessed using the following headings, which take into consideration environmental and planning issues, construction and operational viability and availability. Baseline information was used from the earlier environmental sieving exercise as well as intelligence from commercial land agents, and early site visit appraisals from a landscape architects and town planners.

- Site Reference
- Address
- Description
- Plan
- Aerial
- Photograph / Image
- Land Available (estimate) (hectares)
- Land Use
- Onsite Physical Constraints
- Onsite National / Local Designations
- Adjacent Constraints
- Other Nearby Constraints
- Planning History
- Green Belt Review 2017 and 2018 Update
- Landscape Appraisal (selected sites)
- EDF Feasibility Issues
- Commercial / Landowner Interest

An overall score (Red / Amber / Green) was then used to determine if the site would be shortlisted for further consideration by the client.

- Green – limited / manageable constraints to development. Site shortlisted.
- Amber – some challenging constraints to development. Site shortlisted.
- Red – significant constraints to development / and or confirmed no land available that would be difficult to overcome. Site not shortlisted.

The full ASA table is provided as Appendix D.

6.3 Shortlisted Land Parcels

Of the 51 sites that were assessed only ten sites were shortlisted. An additional site was also considered. It is highlighted as 'unnumbered'. The sites are located in specific geographical areas – there is a cluster southwest of A602 (nos. 20 to 24), a cluster out towards the western edge of the 2km study area (no.31 and no.32) and a cluster south of Wymondley substation (no.38, no.39 and no.40). Illustrated in Figure 9.

Table 2 Shortlisted Sites (Refer to Appendix D for more details)

Site Ref	Details	Decision
No.20	Land east of Blakemore End Road, south of A602 and north of Stevenage Road, Little Wymondley Agricultural fields transected by OHLs	Discounted due to potential for views into the site and unknown drainage discharge options
No.21	Land at Bury Wood, Little Wymondley, Hitchin Agricultural fields transected by OHLs	west portion shortlisted



Site Ref	Details	Decision
No.22	Todds End, Todds Green, Little Wymondley Site comprising several small fields west of Todd's Green, south of Stevenage Road, Little Wymondley	Discounted due to proximity to residential and constrained site
No.23	Land at Lower Titmore Green, Little Wymondley Agricultural fields south of drain and west of Lucas's Wood	Discounted due to access issues
No.24	Land West of Lucas's Wood, Little Wymondley Agricultural fields west of Lucas's Wood	Discounted due to access issues
No.31	Land West of Preston Road, St. Ippolyts, Hitchin Eastern portion of an agricultural field	Discounted due to distance from PoC
No.32	Land forming part of Thirstley Farm, Thirstley Lane, St. Ippolyts, Hitchin Multiple agricultural fields containing hedgerows and Thirstley Pond	Discounted due to proximity to residential property
No.38	Land west of Tittendell Lane and North of Little Almshoe Land Round the Wyck, St. Ippolyts, Hitchin Two agricultural fields located to the east of Ippollitts Brook	Discounted as land considered too open and 'rural'
No.39	Land to the east of Tittendell Lane, South of Little Almshoe Lane and North of Little Almshoe Lane Round the Wick, St. Ippolyts, Hitchin Agricultural field	Discounted as land considered too open and 'rural' and proximity to Grade II Listed Building

Site Ref	Details	Decision
No.40	Land to the east of Little Almshoe Lane, St Ippolyts, Hitchin Agricultural field to the south of a PRow	Discounted as considered too close to residential properties
Unnumbered	The site wasn't included in the original list due to the FZ2 and FZ3 designations.	The site was investigated however the combination of flood risk and development costs was prohibitive. Land on the south-west side of Stevenage Road, Little Wymondley. A Pre-App was submitted to NHC for this site. The site was not progressed due to flood risk considerations.



Figure 9 Location of Shortlisted Land Parcels



Note: The BESS planning application boundary has been added for context

6.4 Site Selection

Site No.21 was selected by the client as the preferred site to take forward. This parcel is crossed by overhead lines and has several pylons. This site has an existing access to the public highway, relatively flat topography and is an acceptable distance to the POC for cabling. The distance from residential properties was over 150m

and the site is well screened. The A602 dual carriageway, running east-west, forms the northern boundary, while Stevenage Road and Chantry Lane skirt the southern and eastern boundaries.

Figure 10 Preferred Site – No.21



Note: The BESS planning application boundary has been added for context



7.0 Conclusion

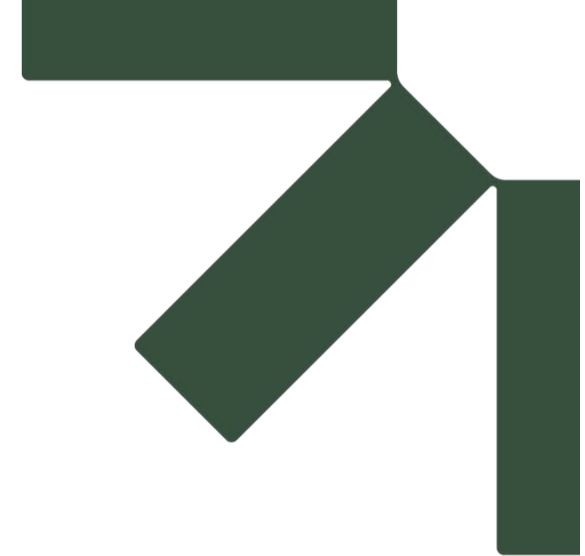
The sequential assessment and ASA for the BESS development at Wymondley have been undertaken with thorough consideration of various constraints and opportunities. The methodology, developed by SLR Consulting Ltd with input from EDF-R and a commercial land agent, involved a detailed three-stage process: sieving environmental constraints, conducting a sequential assessment, and performing an ASA.

The assessment identified very limited unconstrained land within a 2km radius of the Wymondley Substation and none of the small pockets of land were suitable for a BESS development. The remaining land unconstrained by key environmental or technical constraints is all found within the Green Belt. Therefore, the search for sites necessarily had to focus only on unconstrained sites within the Green Belt. Despite the extensive search, only ten sites were shortlisted from the 51 assessed, with an additional site considered but later aborted due to flood risk considerations.

Site No. 21 was selected as the most appropriate site for the BESS development based on the final RAG assessment process. This site was deemed to have acceptable access, topography, and distance to the point of connection (POC) for cabling. It is well screened and over 150m from the nearest residential property. The site is bounded by the A602 dual carriageway to the north, Stevenage Road and Chantry Lane to the south and east, and contains several pylons with overhead cables, making it relatively contained.

The comprehensive assessment and selection process demonstrates that Site No. 21 is the most viable option for the BESS development, considering the constraints and requirements. This supports the case for VSC necessary for development within the Green Belt, aligning with the wider environmental benefits associated with battery storage and renewable energy projects.





Appendix A Constraints Plans

Legend

Air Quality Constraints

 Air Quality Management Area (AQMA)

Ecology Constraints

 Ancient Woodland

 Woodland

 Woodland 10 m Buffer

Cultural Heritage Constraints

Listed Building (Grade)

 Grade I Listed Building

 Grade II Listed Building

 Grade II* Listed Building

 Listed Building (Grade I) 50 m Buffer

 Listed Building (Grade II & II*) 20 m Buffer

 Scheduled Monument

Landscape Constraints

 Green Belt

 Urban Area

 Urban Area 50 m Buffer

 Residential Building

 Residential Building 50 m Buffer

Hydrology Constraints

 Watercourse

 Waterbody

 Watercourse and Waterbody 10 m Buffer

 Environment Agency Flood Zone 3

 Environment Agency Flood Zone 2

Transport Constraints

 Public Rights of Way

 Public Rights of Way 10 m Buffer

 Road

 Road 20 m Buffer

 Railway

 Railway 20 m Buffer

 National Cycle Route

 National Cycle Network 20 m Buffer

Land Quality Constraints

 Historic Landfill Site

 Permitted Waste and Authorised Landfill Site

Utilities Constraints

400kV Overhead Line

National Grid Asset - Operating Voltage

 400kV Overhead Line

 400kV Overhead Line 11 m Buffer

Electric Cable

National Grid Asset - Operating Voltage

 132kV Underground Cable

 Electric Cable 11 m Buffer

North Hertfordshire District Council Local Plan

 Conservation Area

 Housing Site

 Safeguarded Land

 Urban Open land

 Archaeological Area

 Asset of Community Value

Stevenage District Local Plan

Chapter 6: A Strong Competitive Economy

 EC1 - Allocated Site for Employment Development

Chapter 8: Infrastructure and Transport

 IT2 - West of Stevenage Safeguarded Corridor

Chapter 9: High Quality Homes

 HO2 - Stevenage West

Chapter 13: Climate Change, Flooding and Pollution

 FP4 - Flood Storage Reservoir

Chapter 14: The Natural and Historic Environments

 NH1 - Principle Open Space

 NH2 - Wildlife Site

 NH4 - Green Link

 NH9 - Area of Archaeological Significance

Planning Application Status (Labelled with Planning Application Number)

 Approved

 Under Consideration

 Screening

 Screening Opinion Has Yet to be Issued

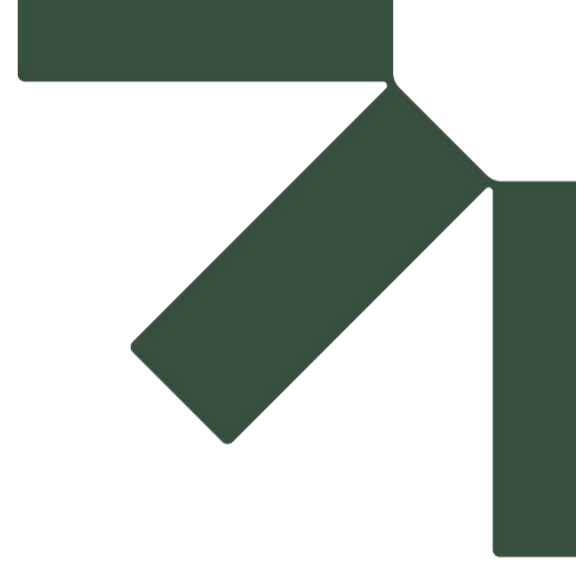
 Refused



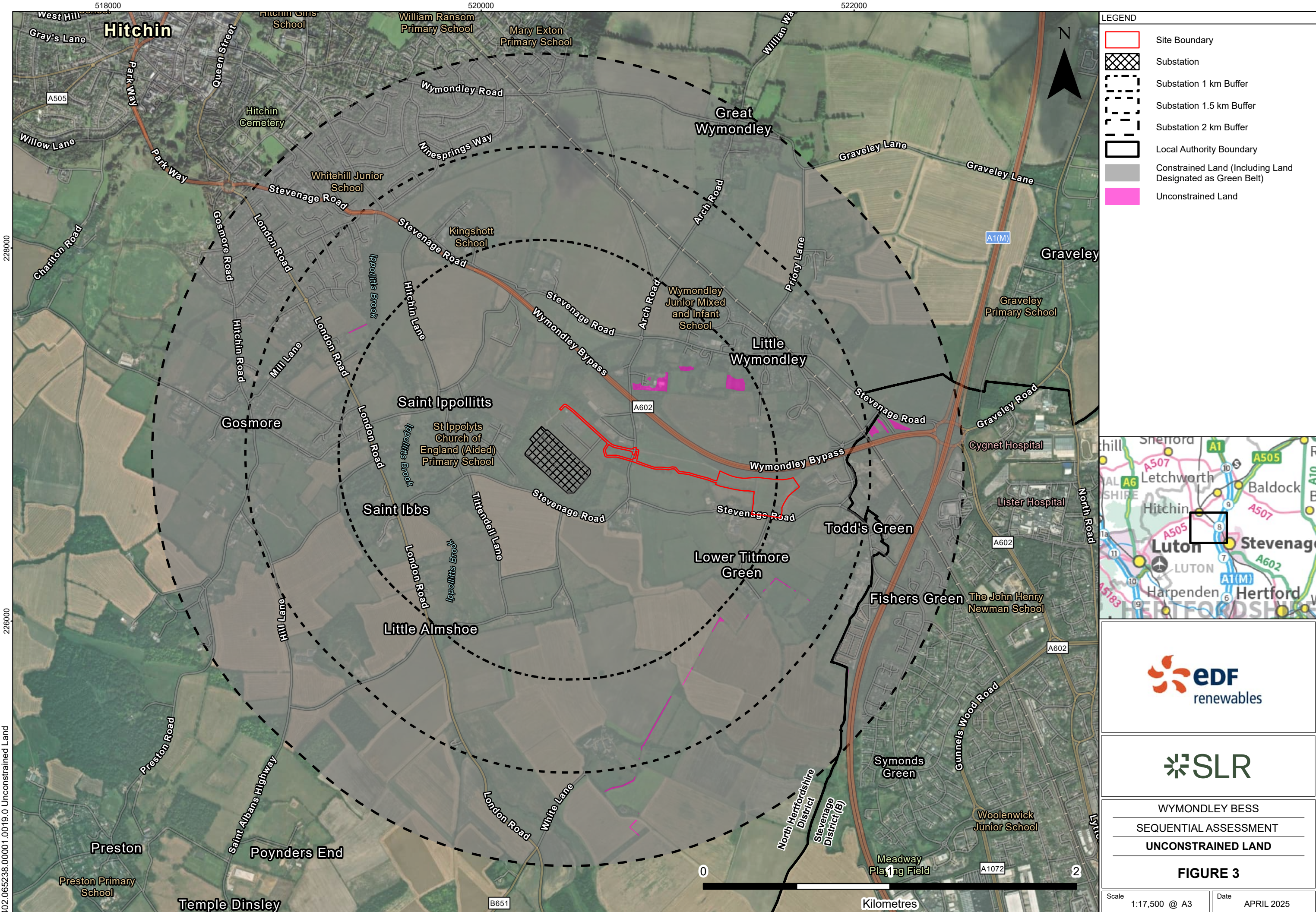
WYMONDLEY BESS & ISS
SEQUENTIAL ASSESSMENT
SITE SPECIFIC CONSTRAINTS

FIGURE 1.2

Date
APRIL 2025



Appendix B Sequential Plans



518000

520000

522000

228000

226000

402.065238.00001.0019.0 Unconstrained Land

LEGEND

Site Boundary

Substation

WYMONDLEY BSS

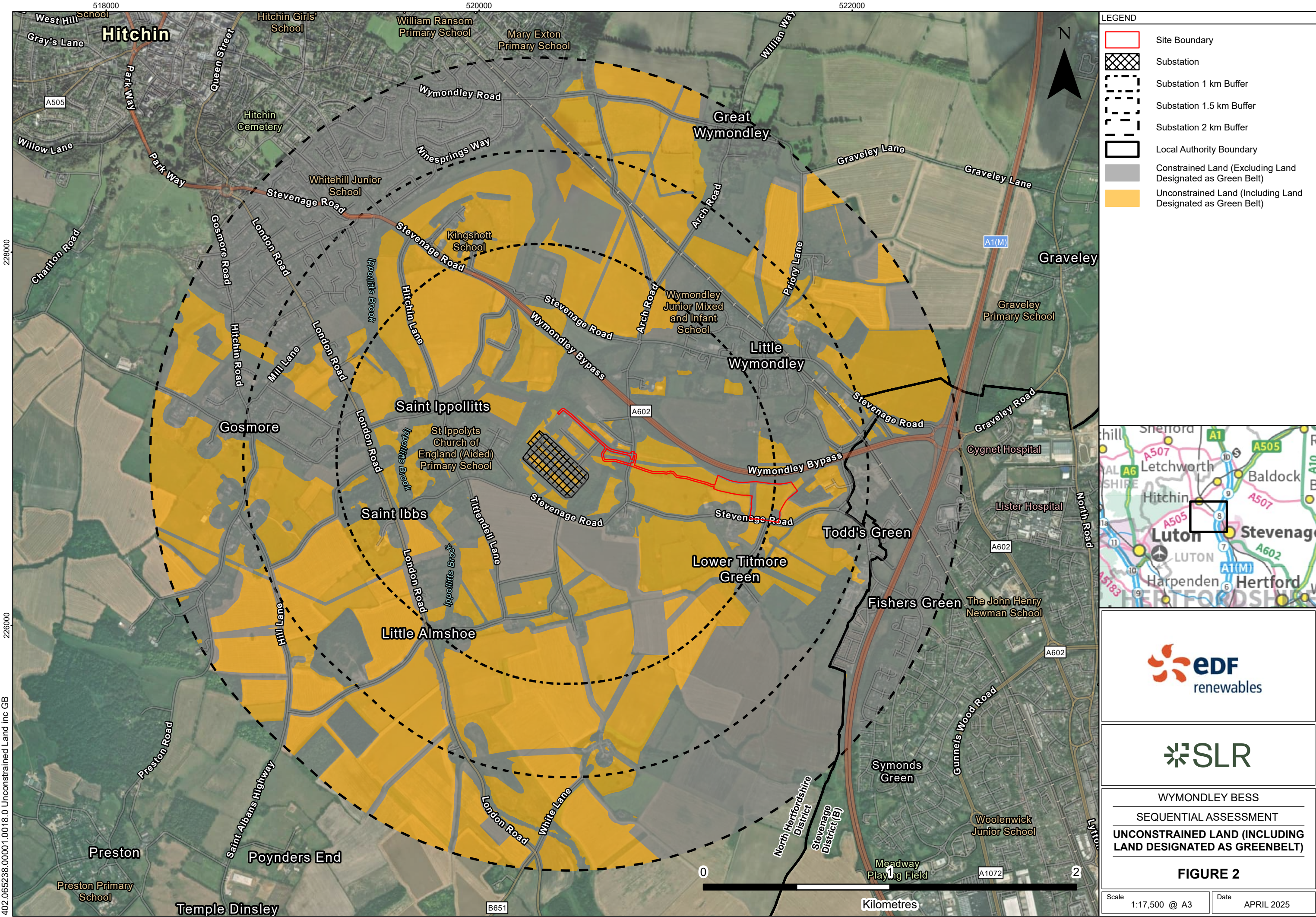
SEQUENTIAL ASSESSMENT

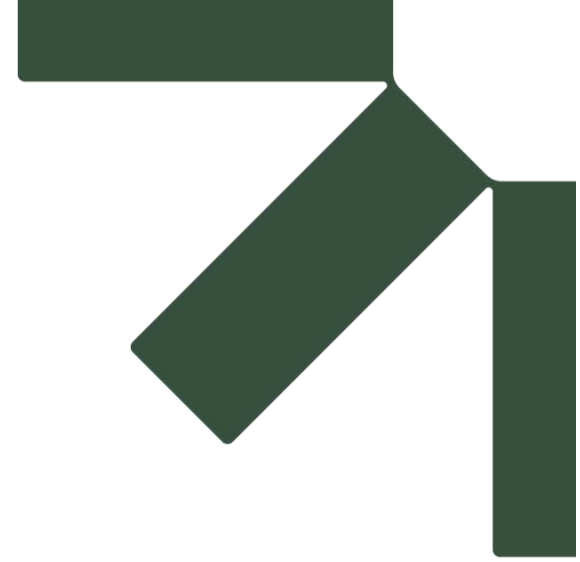
UNCONSTRAINED LAND

FIGURE 3

Scale1:17,500 @ A3

DateAPRIL 2025





Appendix C Numbered Sites

