



Sequential & Alternative Sites Appraisal

Wymondley BESS Site Search

Pivoted Power LLP (part of EDF Energy Renewables Ltd)

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Basis of Report

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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extensive search, only ten sites were shortlisted from the 51 assessed, with an additional site considered but later withdrawn due to flood risk considerations.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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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

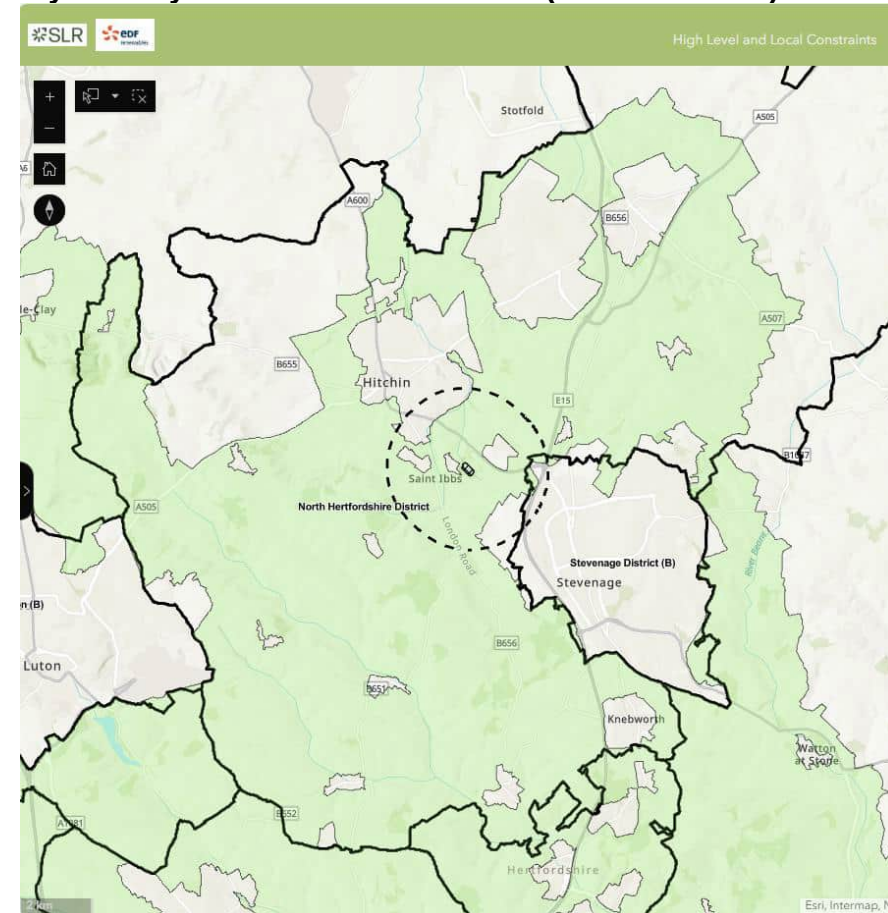
Section 4 – Sieve of Environmental Constraints

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

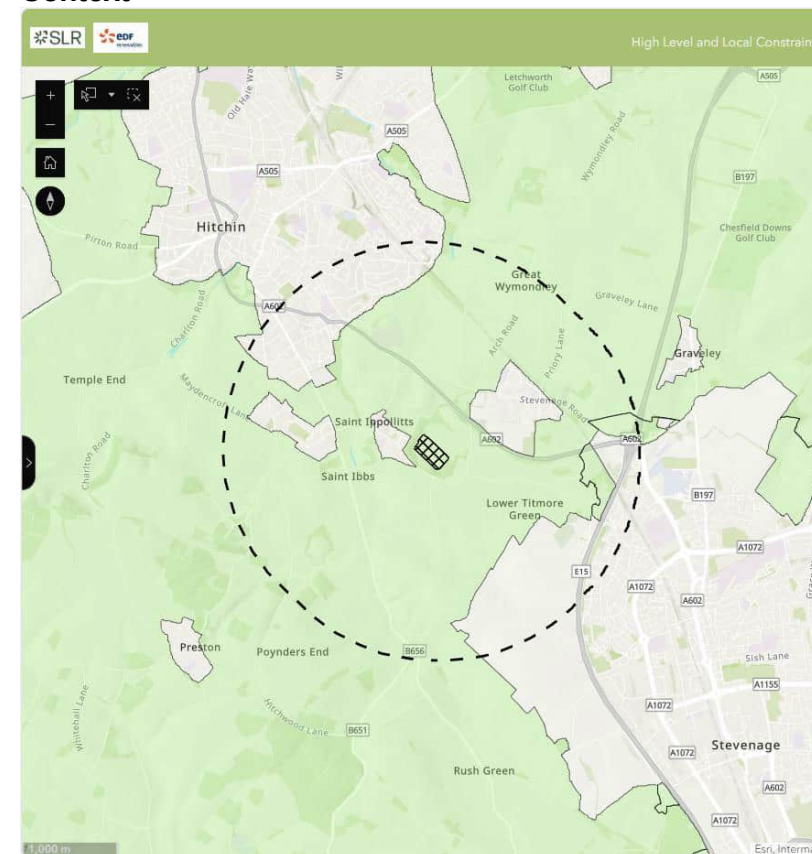
The study considered NHC's Brownfield Land Register (2023 version). The register contains only 12 sites and is primarily focussed on the identification of land for housing, therefore most of the sites were unsuitable for BESS development. Only two of the sites were over 1.6ha (minimum site area) and 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

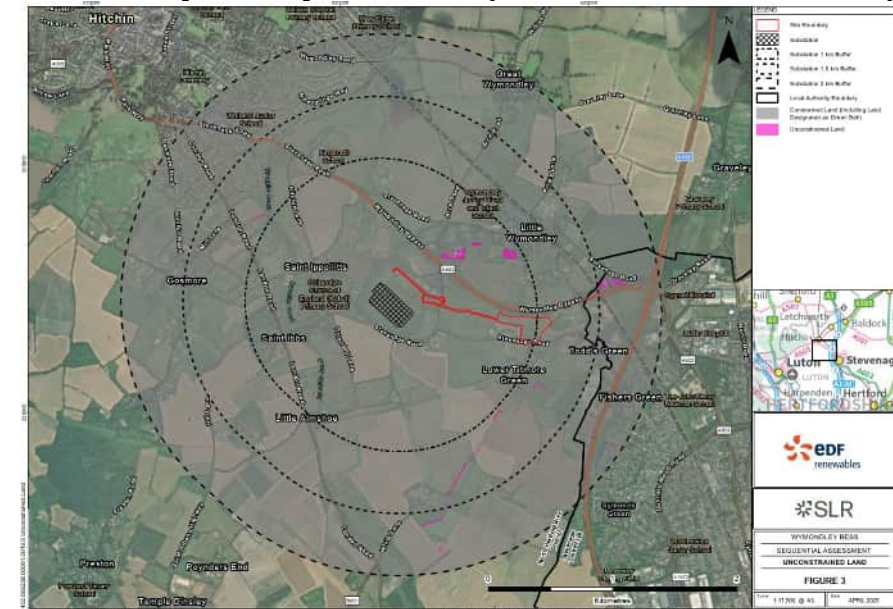
5.1 Unconstrained Land

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)

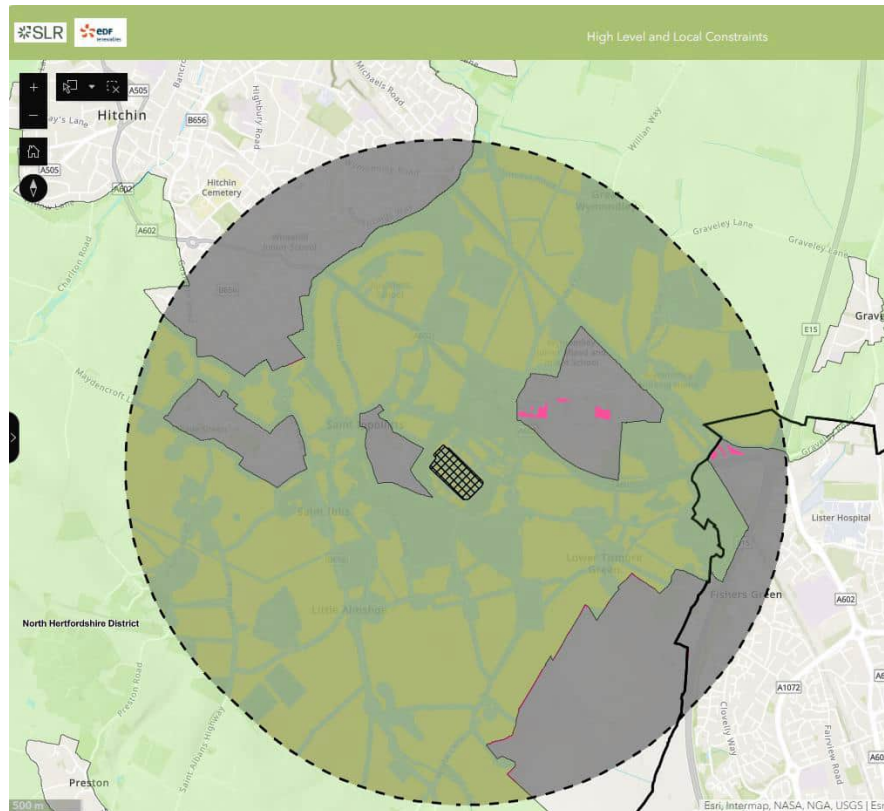


Note: The BESS planning application boundary has been added for context

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

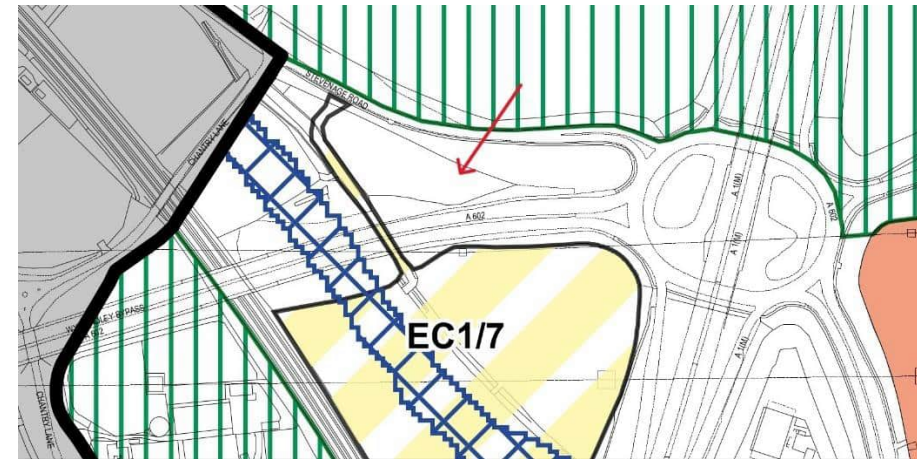


Figure 5 Unconstrained Land (Pink) within 2km of Wymondley Substation (all within the Settlement Boundaries (Grey))



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)



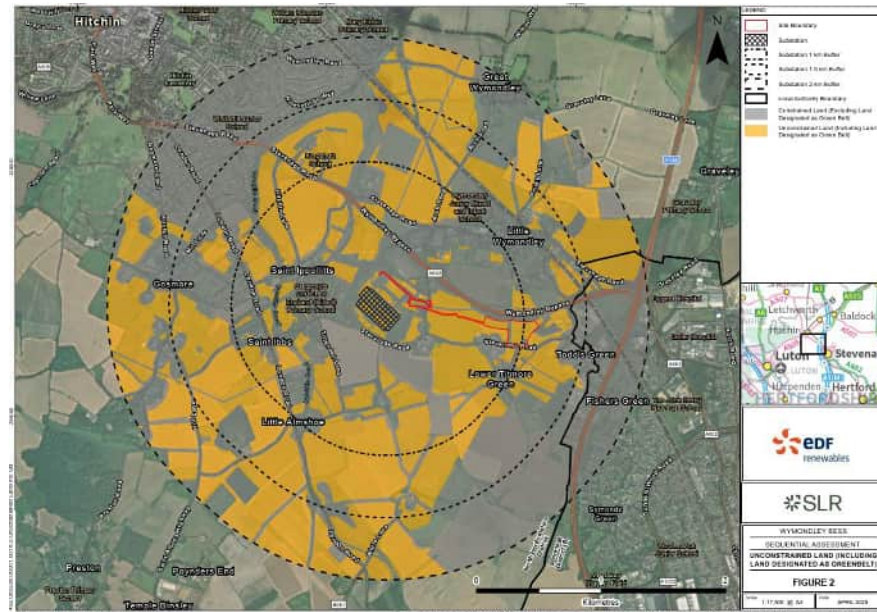
Extract from SBC 2019 Adopted Local Plan (2011-2031) Policies Map. The site shown east of Chantry Lane was partly shown as partly 'unconstrained' in the sequential assessment. This is unsuitable due to flood risk and limited developable area. Site identified as EC1/7 is allocated for 12,500m² of B8 and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

