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**Lead Local Flood Authority
Growth and Environment
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Contact: SuDS and Watercourses Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 17/02/2025

Dear Ben

RE: 25/01947/FP- Battery Energy Storage System (BESS), ground mounted solar farm, associated infrastructure, access and landscaping. - Land South Of A507 Near Cumberlow Green Clothall Road Clothall Hertfordshire

Thank you for your consultation on the above site, received on 27-08-2025. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for the proposed Site spans a total of 187.3 hectares, of which approximately 60% (112.2 ha) will be dedicated to electrical infrastructure, including solar panels, Battery Energy Storage Systems (BESS), and a substation. The remaining 40% (75.1 ha) will be allocated for ecological enhancements, focusing on biodiversity improvements and landscaping to support environmental sustainability.

Thank you for providing the Flood Risk assessment and Drainage strategy. However, we **object** this planning application in the absence of an acceptable Drainage strategy and supporting information relating to:

- The applicant proposes to discharge surface runoff to the ground; however, detailed infiltration testing in accordance with BRE365 standards is required to determine feasible infiltration rates.
- The development is not in accordance with NPPF, PPG or North Hertfordshire local policies including NE8.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 171, 181 and 182 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall

events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

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

1. An infiltration test, undertaken in accordance with BRE 365 standards, is required to establish the feasibility of infiltration at the Site. In the absence of such testing, a conservative infiltration rate of 1.0×10^{-6} m/s must be adopted as a worst-case scenario. All storage requirements and drainage conveyance calculations are to be based on this assumption.
2. The Site lies within Source Protection Zone 3, which represents the lowest risk to public water supplies. However, the presence of numerous private supplies means that Source Protection Zone 1 considerations may also apply. Further detail must therefore be provided on interception measures, the formal drainage of roads, and the incorporation of source control techniques, such as permeable surfacing, where feasible, without increasing the risk of groundwater pollution.
3. A site-specific water quality assessment is required for runoff from the battery storage and substation areas, as this cannot be adequately evaluated using the Simple Index Approach (Chapter 26 of the SuDS Manual). Road runoff, particularly during the construction phase, must also be assessed. Consultation with the Environment Agency may be necessary.
4. The applicant must provide hydraulic calculations for the final drainage strategy under the 1% AEP plus climate change scenario, using the most up-to-date rainfall data (FEH2013 or FEH2022) and the correct parameters (CV value of 1).
5. The applicant must demonstrate that all proposed development can be made safe for its future, without increasing flood risk elsewhere, and that residual risks are appropriately managed. A sequential approach to site layout should be applied, prioritising the location of more vulnerable development in areas of lowest risk. As climate change allowances are not incorporated into the surface water flood maps the low risk (between a 1% and 0.1%) Flood Extent must be used as a proxy. Development should avoid these flow path areas to ensure the flow paths remain free from blockages and obstructions, thereby ensuring surface water flood risk is not increased elsewhere.
6. It is assumed that the Solar panels will not cause an increase to flow off site, however Solar panels as highlighted in the FRA do increase the risk of rivets and drainage channels forming underneath the panels creating flow routes from the site as these change the characteristics of the rain falling on to the ground. Without a suitable drainage system and due to the lifetime of the development these can lead to increased discharge rates and volumes from the site to the adjacent watercourse increasing flood risk to the surrounding area. Details must be submitted that demonstrate this water will be controlled in a SuDS drainage system ensuring the surface water runoff and volume is not increased off the site, which in turn if not managed would increase flood risk contrary to NPPF and the PPG.

Informative

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local

Flood Authority. It is advised to discuss proposals for any works at an early stage of proposals.

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

Yours sincerely

Pallavi Patarot
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- JPG - Flood Risk Assessment & Sustainable Drainage Strategy, Westfield Energy Conservation Park Hertfordshire, 7 March 2025, Version 1.0
- Planning, Design and Access Statement - Westfield Energy Conservation Park, July 2025, Version 1.2.
- Drawing: Site Layout Plan, Lanpro, 12 February 2025, revision 09.
- JPG –Geoenvironmental Desk Study Report, Westfield Energy Conservation Park Hertfordshire, 26 February 2025.