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Buckinghamshire Council  
Directorate for Planning, Growth and  
Sustainability  
23 Willow Crescent East  
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UB9 4AR

**Our ref:** NE/2024/137354  
**Your ref:** 23/03875/APP  
**Date:** 30 October 2024

Dear Zaneb,

**Rookery Farm, Granborough, Buckinghamshire, MK18 3NJ**

**Development of a Battery Energy Storage System (BESS), connected directly to the national grid with associated infrastructure including access, drainage and landscaping.**

Thank you for consulting us on the above application on 01/10/24 and apologies for the delay in our response.

We thank the applicant for their updated Flood Risk Assessment and withdraw our previous objections (dated 17/09/24, 05/06/24 and 09/05/24). As such, we have **no further objections**.

#### **Review of Flood Risk Assessment (FRA)**

We have reviewed the submitted Flood Risk Assessment (FRA) (SLR Consulting Ltd, Project No. 428.013276.00001) and consider this to be acceptable for the scale and nature of the proposed development, therefore we can remove our previous objection.

Flood risk modelling undertaken by a third party has been used in support of this application and the Environment Agency has applied a risk based approach to the assessment of this model. In this instance a basic review has been carried out. The Environment Agency has not undertaken a full assessment of the fitness for purpose of the modelling and can accept no liability for any errors or inadequacies in the model.

#### **Battery Compound and Substation**

The FRA includes hydraulic modelling which indicates that the battery compound and substation are located outside of the 1% AEP + CC Fluvial flood outline. The FRA also states that a freeboard of 510mm will be included.

#### **Temporary Haul Road and Bridges**

The baseline model was updated to include the proposed temporary haul road and two temporary bridges and when comparing the proposed and baseline results modelled flood depth changes were minor (+/- 5mm) which is considered acceptable given these

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features are only temporarily in use during the construction of the site. The FRA states that *'it is assumed that within the floodplain the haul road will be maintained at the existing ground levels'*. Please note that any potential ground level changes are likely to alter flood extents further up and/or downstream in an unacceptable manner. However, the applicant has explicitly confirmed (via email dated 30/10/24) that existing ground levels will remain unchanged for the haul road. As such, we have no further concerns in this regard.

## **Advice to the LPA**

### **National Planning Policy Framework Flood Risk Sequential Test**

In accordance with the National Planning Policy Framework (paragraph 168), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the Local Planning Authority to determine if the sequential test needs to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

Please be aware that although we have raised no objection to this planning application on flood risk grounds, this should not be taken to mean that we consider the proposal to have passed the Sequential Test.

### **Pre-Application Advice**

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at [HNLsustainableplaces@environment-agency.gov.uk](mailto:HNLsustainableplaces@environment-agency.gov.uk). Should you have any queries regarding this response, please contact me.

### **Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

**Mr Jan Harwood**  
**Sustainable Places Planning Specialist**

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