



Katie Fowler
Rochford District Council
Planning Department
3-19 South Street
Rochford
Essex
SS4 1BW

Our ref: AE/2023/128277/01-L01
Your ref: 23/00285/FUL
Date: 12 May 2023

Dear Ms. Fowler

**INSTALLATION OF A SOLAR FARM WITH BATTERY STORAGE AND
ASSOCIATED INFRASTRUCTURE**

LAND SOUTH OF NATIONAL GRID CHELMSFORD ROAD, RAWRETH, ESSEX

Thank you for your consultation dated 26 April 2023. We have inspected the application as submitted and are raising a holding objection on flood risk grounds. Our objection and advice showing how this could be addressed by the applicant are included in our response.

Flood Risk

Our maps show the site lies within fluvial/tidal Flood Zone 3a, defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding. The proposal is for the installation of a solar farm with battery storage and associated infrastructure land south of national grid, which is classified as a 'essential infrastructure' development, as defined in [Annex 3:Flood Vulnerability classification](#) of the Planning Practice Guidance (PPG). Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests, demonstrating that it can be designed to remain operational and safe in times of flood and be supported by a site specific Flood Risk Assessment (FRA).

Flood Risk Assessment

We have reviewed the submitted flood risk assessment (FRA), prepared by Wallingford HydroSolutions Ltd., referenced WHS1973 and dated October 2022, and consider it does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference IDs: 7-020-20220825 to 7-022-20220825. It does not, therefore, provide a suitable basis for assessment to

be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

1. Use the correct flood levels from us to detail the flood risk to the site both now, and over the development's lifetime, taking into consideration climate change for both the 1% (1 in 100 annual probability) and the 0.1% (1 in 1000 annual probability) flood events.
2. Use the Sequential Approach in the siting of the development.
3. No topographic survey has been submitted.

Overcoming our Objection

1. Flood levels can be requested from our Customers and Engagement team. Please see the Advice to applicant section. Please note that climate change allowances were updated in July last year and the flood levels obtained from us should be updated to reflect the latest information. please see advice to applicant section for further information
2. Sequentially site the development in Flood Zone 1 if possible, then Flood Zone 2 then Flood Zone 3. Where it is not possible to locate infrastructure solely within flood zone 1, it must be demonstrated that infrastructure can be provided above the flood level, to ensure it can remain operational during a flood. We note that the substation has been located within flood zone 1 and the panels would return to a stowage height of 2 metres in areas liable to flooding. The FRA should demonstrate that this height is above flood levels, taking into consideration climate change. Consideration should also be given to the operation of any cabling between panel units and the substation, battery and transformer locations, storage containers etc., ensuring these would remain operational during a flood.
3. Submit a GPS verified topographic survey.

The applicant can overcome our objection by submitting an FRA that covers the deficiencies highlighted above and demonstrates that the development will be safe will not increase risk elsewhere. If this cannot be achieved, we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. Further advice is provided for the applicant at the end of this letter.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the [Town and Country Planning \(Consultation\) \(England\) Direction 2009](#).

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

Environmental Permitting Regulations

The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. The River Crouch, is designated a 'main river'.

Application forms and further information can be found at:
<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Pat Abbott', is written over a faint, circular official stamp.

Mr. Pat Abbott
Planning Advisor

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