



The countryside charity
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Standing up for Hertfordshire's countryside

Ms Ashley Ransome
Development Management
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref:

23rd July 2021 (by email)

Dear Ms Ransome,

Application No. 3/21/0969/FUL

Land at Greens Farm, East End, Stocking Pelham, Buntingford, SG9 0JU

Construction of a 500MW battery energy storage system facility and associated works etc.

I write with reference to the above proposal for a battery storage facility on high quality agricultural land adjacent to Greens Farm. CPRE Hertfordshire has a number of concerns regarding this proposal, as noted below, and urges the Council to refuse this application on the grounds, amongst others, that it is premature with regard to the determination of several solar power installations which are being proposed for the immediate area and thus directly relevant to its consideration.

1. This application is not supported by the appropriate technical information which would provide a justification in terms of need for battery storage in this location beyond that which already exists. The applicant's agent, in the Planning, Design and Access Statement accompanying the application, justifies the application in large part by reference to the undoubted national need for sustainable energy generation, without any significant attempt to discuss the specific or future requirements for storage in this location, other than its proximity to the existing National Grid site and the availability of land and related matters.
2. The Planning Design and Access Statement outlines a national justification for solar power and correctly notes that national Planning Practice Guidance in relation to electricity generation "remains unreferenced". On that basis, it is reasonable to suggest that existing planning policy should apply in this case, which relates to countryside and agricultural land in this area, as noted in para. 4 below.
3. It would thus appear, in the absence of direct reference, that the justification for this proposal lies in the imminent development of a number of significant solar power installations with considerable implications for productive agricultural land, the open countryside and impacts on the villages of Stocking Pelham and Furneux Pelham and surrounding settlements. The companies promoting these installations have started circulating information to local residents but no planning applications have yet been made.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

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4. Given the significance and complexity of these potential applications, and the uncertainty of their outcomes, it would be highly inappropriate in our view to seek to provide storage capacity which may not be needed, and whose magnitude is presently unknown. In fact, it is possible that the problem of storage capacity, if permitted, would be used as a justification for extensive solar installations, thus potentially reversing the priority of the issues to be considered.
5. Notwithstanding the uncertainty regarding the need for this facility at present, CPRE Hertfordshire also remains concerned by the use of high quality agricultural land (Grade 2) for non-agricultural uses as well as the issues of noise, traffic, landscaping and biodiversity which have been raised in detail by other respondents to this application and which we support.
6. The proposed development is located in Rural Area Beyond the Green Belt and does not satisfy any of the eight criteria identified in East Herts District Plan Policy GBR2, paras. a) to h) as exceptions to the requirement to prevent development in valued countryside, and this provides further reasons for refusal of this damaging application.
7. Of wider relevance are concerns related to the carbon cost of the raw materials and manufacture of battery storage installations. There is no consideration of these issues in the application, nor of safe and environmentally appropriate decommissioning of the batteries and reinstatement of land at the end of the operating life of the installation.
8. The applicant, Pelham Power Ltd, appears to be a recently incorporated company and there is a general lack of information on their track record relating to the operation of battery storage facilities. The Council should satisfy itself that safety issues relating to the design, construction and ongoing management of the facility are properly addressed, in particular the risk of fire and release of toxic fumes.

Yours sincerely,

Chris Berry
Planning Manager