



The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

Fiona Dunning
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

17th June 2022 (by email)

Dear Fiona Dunning,

Application no. 3/22/0806/FUL
Land off Crabbs Lane and Pelham Substation, Stocking Pelham
Construction and operation of a Battery Energy Storage System
and associated infrastructure

CPRE Hertfordshire strongly objects to the above application for the following reasons:

1. The site lies within land designated as Rural Area Beyond the Green Belt (RABGB) as defined in the adopted East Herts District Plan 2018. It is thus misleading for the consultants to the Applicant (in the Planning Design and Access statement) to suggest that the site is "not covered by...any...environmental designation" when they note that it is in RABGB (paragraph 2.6) without further discussion.
2. RABGB is a Local Plan designation which confers significant protections against inappropriate development. Policy GBR2 seeks to maintain RABGB as a "considerable countryside resource"; the proposed development does not fall within any of the exceptional categories identified by this policy and the Applicant makes no attempt to suggest that it does.
3. This proposal is part of a gradual encroachment onto open countryside in this area of ground-mounted solar energy generation installations and their associated infrastructure. The proliferation of applications for solar energy generation in the area of the Hertfordshire – Essex border is causing significant concern to local village residents due to the sheer scale of the proposed projects and the encirclement of rural villages.
4. It is not appropriate to deal with such applications individually, as the cumulative impacts of the solar installations and infrastructure such as Battery Energy Storage Systems (BESS) are hugely damaging to the functions, appearance and present uses of the countryside. The Applicant's Planning Statement focusses entirely on local and

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: Allan McNab

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central government policies relating to renewable energy generation, whilst ignoring the balancing concerns of countryside protection and local residents' amenity.

5. The need for the BESS in this location is not adequately addressed except in the most general terms relating to national storage capacity criteria. Several proposals for ground-mounted solar energy generation are being advanced in the area against strong local opposition and it is premature to add to the encroachment into the countryside for storage related to generation capacity which may not be approved.
6. A contributory factor is the recent history of measures for existing installations which have been promised and not delivered, such as landscaping and measures to ameliorate the adverse effects and respect the character of the surrounding countryside. Very significant planting and boundary treatment would be needed to hide the buildings, and adequate details of such requirements is lacking.
7. The proposal uses nearly two hectares of agricultural land which is categorised as Grade 2 and thus "best and most versatile (BMV)" land. Food security and related issues are increasing in importance and there is no consideration in this application of the loss of agricultural land.
8. It is also necessary to challenge the assertion, very widely made by ground-mounted solar installation promoters that their proposals are temporary and can and will revert to their existing use when the development is removed. Apart from the uncertainty of the future removal process, development for 40 years will permanently affect the land affected both physically and with regard to the institutional arrangements necessary to ensure its reversion.
9. The additional storage capacity proposed is likely to have serious impact on local village residents already affected by the existing installations. We support those who have noted the potential safety aspects relating to the operation of BESS and the impact on local rural lanes of construction traffic and safety access which need to be addressed more fully.
10. CPRE Hertfordshire has prepared a [policy statement](#) relating to many aspects of solar energy generation and storage which is attached for your interest. It is clear both from the multiplicity of related proposals and the local responses that a coordinated approach is necessary for the consideration of ground-mounted solar installations and associated infrastructure in this area to ensure minimum impact on highly valued and productive countryside.



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Yours sincerely,

Chris Berry
Planning Manager