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Standing up for Hertfordshire's countryside

Emily Stafford
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

8th December 2023 (by email)

Dear Emily Stafford,

Application no. 23/1508/OUT
Land Rear of Electricity Station, Hilfield Lane, Aldenham
Application for a Battery Energy Storage System (BESS) and associated landscaping
and access. Outline Application to include Access.
(Appearance, Landscape, Layout & Scale are Reserved)

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted Hertsmere Core Strategy where development is seen as inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The Applicant's consultant's Planning Statement suggests very special circumstances relating to the need for renewable energy and to move to net zero emissions by increasing renewable energy capacity. It is suggested that the proposed development is in line with Government and Council policies regarding the encouragement of renewable energy generation.
3. It may be noted initially that the proposal does not relate to energy generation but to storage in a very large number of bulky containers covering the majority of a twelve hectare site which is presently designated protected open countryside. The Green Belt around Elstree is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings.
4. The storage of power for the National Grid need not be limited to a specific location, notwithstanding the Applicant's assertion that the proximity of the Elstree Sub-station is a positive locating factor. In the absence of an adjacent renewable energy generation

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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source, there is no justification for the use of Green Belt for such an extensive facility which would appear to be the largest such installation in the country.

5. The Applicant refers to the frequently delayed outstanding decision from the Secretary of State regarding the proposed solar installation, referred to by the Applicant as the Hilfield Solar Farm. This application was refused permission by Hertsmere Council and CPRE Hertfordshire joined local community groups and the Council at the planning inquiry which took place over a year ago.
6. Powerful arguments were made at the planning inquiry regarding the inappropriateness of the proposed solar installation in terms of Green Belt, landscape and heritage issues, and many of these issues are directly relevant to the present application. It would be entirely inappropriate in our view to determine this application in advance of the decision by the Secretary of State, particularly given its scale and impacts.
7. It is accepted by the Applicant that the proposed development will affect the openness and character of the Green Belt in this location. The presence of over 500 containers and structures up to 6.5 metres in height will have a major impact on the landscape and rural character of the area.
8. Both the area proposed for development and immediately adjacent areas are used extensively by local communities and visitors for recreation and leisure purposes. The considerable physical and mental health benefits from open space within convenient reach of built-up areas are increasingly recognised and these will be seriously jeopardised by this proposal.
9. The use of Public Rights of Way in and around the site will be detrimentally affected by the proposed development. Residents and visitors will be subject to both the visual and aural impacts of the installation.
10. CPRE Hertfordshire supports the analysis and discussion of potentially serious noise impacts in the consultation submission of the Letchmore Heath Village Trust. It is clear that this is a growing area of concern which will greatly affect the surrounding area and requires urgent further investigation.
11. We note the significant number of heritage assets in the immediate area of the proposed development which contribute to the quality of the countryside in this area. The site is also adjacent to the Letchmore Heath Conservation Area, a Local Wildlife Site and Bhaktivedanta Manor which will all be severely impacted by this proposal.



12. We support fully the concerns of the Letchmore Heath Village Trust and the Patchetts Green Residents Association and request the Council to refuse permission for this highly inappropriate development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.