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Standing up for Hertfordshire's countryside

Steve Fraser-Lim
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

26th April 2024 (by email)

Dear Steve Fraser-Lim,

Application no. 3/24/0620/SCREEN
Land at Greens Farm East End Furneux Pelham
Request for Screening Opinion: construction of 50MW battery energy storage system, with associated access, landscaping and other infrastructure works under application reference: 3/21/0969/FUL

I write with regard to the above request for a screening opinion regarding the above major Battery Energy Storage System (BESS) installation. We have responded previously with regard to application reference 3/21/0969/FUL on 23rd July 2021, and again on 29th September 2021. Our significant concerns remain regarding the original planning application and we are further concerned that a screening opinion has not been sought previously.

The Screening Request (March 2024) prepared by Savills for the Applicant comprises an Environmental Impact Assessment screening checklist as suggested by Planning Practice Guidance (PPG) (actual pages 8 to 30 inclusive, re-numbered in the document as pages 1 to 23). In line with PPG, three columns are shown: Column A - Screening Criteria Question; Column B - Response to the Screening Question Criteria ...; Column C - Is a Significant Effect Likely?

For thirteen Screening Criteria Questions, it is accepted by Savills that criteria apply to this proposed development (Column B – answer yes) but the response in Column C with regard to the significant effects to each of these criteria is negative. For nine Screening Criteria Questions, the responses in Column B are negative and in Column C noted as “not applicable”.

CPRE Hertfordshire is concerned that the responses in Column C are inappropriate in many cases, minimising the significant effects of this proposed development. The Council will need to satisfy itself that the consultant’s assessment of likely significant effects is satisfactory.

Specific concerns relate to the loss of high-quality agricultural land, noise impact, fire and accident risks, impact on biodiversity, visibility from and impacts on public rights of way, and

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cumulative impacts on landscape character. It is increasingly inappropriate to consider these proposals in isolation in the light of adjacent and neighbouring similar installations, and consented and proposed solar installations in the area.

Further continuing research including that recently published by the Department for Energy Security and Net Zero (Health and safety in grid scale electrical energy storage systems (April 2024)) identifies the increasing numbers and complexity of BESS installations and the need to adhere to appropriate health and safety standards. Also, in 2023 the National Fire Chiefs Council issued Grid Scale BESS Planning guidelines with the safety of the public and emergency responders in mind.

These highlight that whilst Fire Rescue Services (FRSs) may be engaged throughout the planning process, this is not yet a statutory requirement and the guidelines state that “ a number of high profile incidents have taken place and learning ..continues to emerge.” (<https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf>).

The proliferation of solar array and associated infrastructure proposals in the Pelhams villages increases the significance of the above and related concerns, and would alter significantly the rural character of this important agricultural area. Existing Local Plan policy relating to Rural Area Beyond the Green Belt should require a robust analysis of the impact of this and similar proposals, to assess the full environmental and safety impacts.

Accordingly , we would request that the Council requires an Environmental Statement to be prepared for this and similar energy storage installations.

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.