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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

23rd October 2024 (by email)

Dear Emily Breen,

Application no. 23/1508/OUT
Land Rear of Electricity Station Hilfield Lane Aldenham
AMENDMENTS; 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 amendments received in respect of the above application, following our previous response on 8th December 2023. CPRE Hertfordshire notes the amendments resulting in some reduction in the number of battery storage units but the essential magnitude of the development remains and we maintain our strong objection to the proposed development for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the adopted Hertsmere Core Strategy according to criteria in the National Planning Policy Framework (NPPF). Development in the Green Belt is inappropriate unless very special circumstances can be demonstrated to clearly outweigh the harm caused by the proposal.
2. The Applicant maintains that the proposed development is necessary due to the national need for electricity storage and progress towards net zero. The Project Overview Update submitted with the amendments provides no further justification for the installation in this location other than the availability of land adjacent to the Elstree sub-station.
3. This is clearly not sufficient to clearly outweigh the harm caused to the designated protected land. The value and quality of the Green Belt in this immediate area in terms of both landscape and heritage criteria have been emphasised by the recent dismissal for these reasons of the major planning application for ground mounted solar arrays adjacent to the site.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

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

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4. CPRE Hertfordshire supports fully the objections and comprehensive information presented by the Letchmore Heath Village Trust and notes the challenges in respect of the necessity of the proposed development as well as the substantial detrimental impact on the open countryside and surrounding local communities. The large magnitude of this installation is entirely inappropriate in this location, especially as it is unrelated to any specific renewable power generation facility.
5. Together with the increasing awareness of the noise impacts of battery storage, it is not possible within the length of time envisaged for the proposed development to screen the units adequately or reduce their visual intrusion. To suggest that the noise nuisance is partial or even seasonal (as noted in the Project Overview Update) is inaccurate and misleading, and noise and visual impacts will affect enjoyment of the countryside which is used extensively by the local communities and visitors to the area.
6. Our previous concerns regarding the impacts on Public Rights of Way and rural character remain and we urge the Council to refuse permission for this damaging and inappropriate proposal.

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.