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Standing up for Hertfordshire's countryside

Ben Glover
Planning and Building Control
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Our Ref:

Your Ref:

14th March 2025 (by email)

Dear Ben Glover,

Application no. 4/02713/FP
Land at Radwell Bury Farm, Newnham Road, Newnham
Installation of Battery Storage System with associated infrastructure,
earthworks, landscaping and access.

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

1. Whilst the application is not located in the Green Belt, which it immediately adjoins, it is designated as Rural Area Beyond the Green Belt by Policy SP5 of the adopted North Herts Local Plan. Policy SP5 states that there should be a general policy of restraint on open countryside beyond the Green Belt and the position of this development in open countryside demonstrates no constraint nor consideration of the impact on the surrounding environment.
2. Policy SP9 provides guidance on the acceptability of development and emphasises that good design is a key aspect of sustainable development. We believe that little thought has been given to location and none to design and this is significant for a proposed development of a total of 66 buildings including 48 prefab containers, 12 inverters storage units, transformers, control room and substation.
3. This large number of unsightly buildings with no attempt at any design merit will be a significant scar on open countryside and highly visible from the adjoining Green Belt. Any proposed planting will take some years to mature and will have the effect of diminishing the views across the open countryside.
4. The proposed development is located on Grade 2 agricultural land which constitutes Best and Most Versatile Land (BMV). Development on BMV agricultural land should

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine

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be avoided and Government policy is increasingly realising the importance of food security and production.

5. The proposed development is located close to the River Ivel where the water runoff will flow into tributaries and potentially impact this important chalk stream. CPRE campaigns locally and nationally for the preservation and restoration of chalk streams which are globally significant rare habitats.
6. Of 260 chalk streams worldwide, 224 are in England and 10% are in Hertfordshire; a point emphasised in the recent North, East and Central Herts 2050 Vision document. A great deal of work has taken place around Radwell to restore the streams and we view any development that potentially jeopardises the health of the stream and the all-important habitats with concern.
7. We support concerns raised by the Lead Local Flood Authority regarding the location and flooding risks to the proposed development and in relation to the potential contamination of local water courses.
8. The applicant dismisses the risk of fire on the grounds that there has only been one fire at a BESS installation in the UK in recent years and notes that fire safety monitoring is in place. We have previously raised concerns regarding the capability of the Hertfordshire Fire Service to deal with specialised fires in electrical installations of this type.
9. More emphasis needs to be placed on the potential implications of fire, including the potential contamination of water courses and Grade 2 agricultural land by run off. This is particularly important due to the proximity of the River Ivel and its tributaries as already noted.
10. In summary, we wish to express concern regarding the isolated location of this proposed development, unrelated to any adjoining energy generation facility. The Council should satisfy itself that the proposed development is justified in this location and in the absence of such a facility, we urge the Council to refuse permission for this inappropriate development.

Yours sincerely,

Chris Berry
Planning Manager