



The countryside charity
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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:

10th September 2025 (by email)

Dear Steve Fraser-Lim,

**Planning application no. 3/25/0917/FUL
Dellows, Ginns Road, Stocking Pelham, SG9 0JA
Erection of Battery Energy Storage Facility including access works, landscaping and all
associated engineering works.**

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

1. The Planning Access and Design Statement (PDAS) prepared by consultants for the developer is entirely inadequate in addressing a key consideration for this application. Principally, this is identification of the land affected as Rural Area Beyond the Green Belt (RABGB) according to Policy GBR2 of the adopted East Herts District Plan and the significance of the countryside, landscape and heritage implications of the proposal.
2. Paragraph 4.6.1. of the East Herts District Plan states:
"It (RABGB) is a considerable and significant countryside resource which Policy GBR2 seeks to maintain by concentrating development within existing settlements".
This proposal does not comply with any of the exceptions permitted by Policy GBR2. It would introduce development which is deeply injurious to the rural character of the area.
3. The PDAS notes that "The Policy does not make specific reference to renewable energy related proposals and is therefore silent on proposals for BESS development". This is entirely disingenuous as the Policy specifically identifies exceptions, and thus there is no logical basis or requirement for identifying proposals which are not exceptions.
4. The proposed development is also in conflict with Paragraph 187b) of the National Planning Policy Framework (NPPF) which states that:
"Planning policies and decisions should contribute to and enhance the natural and local environment by:b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services..."

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: Peter Waine, OBE

Registered Charity 1162419

CPRE Patron: His Majesty The King

5. CPRE Hertfordshire is fully supportive of the Government's objectives towards the achievement of net zero emissions by 2050 and the promotion of all forms of renewable energy generation. In principle, however, land covered by policy affecting the Rural Area should not be used for development which is highly damaging to the landscape and rural character, effectively industrialising the landscape in the area which is already hugely impacted by large-scale energy generation installations.
6. Whereas CPRE Hertfordshire's concerns are related primarily to the impact on the countryside and landscape, we note and support fully the additional concerns expressed by Berden, Stocking Pelham and Albury Parish Councils and Uttlesford District Council in their detailed responses. Matters regarding noise nuisance are highly relevant to surrounding rural communities, and the dangers arising from potential fire and damage are being increasingly recognized.
7. Hertfordshire is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health. The proliferation of ground mounted energy generation installations in this area continues to have a severe impact on small rural communities which are effectively surrounded by infrastructure.
8. CPRE Hertfordshire believes that there is a balance to be maintained between the protection of local environmental conditions and wider net zero objectives. It is clear from the magnitude of the negative community responses that this is a wholly unacceptable proposal and we request that the Council refuses permission for this unacceptable additional development on agricultural land.

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.