



Our Ref: 5100-01/ARB

30 January 2025

North Hertfordshire District Council
Development and Conservation
PO Box 10613
Nottingham
NG6 6DH

Sent by email only to: Planning.control@north-herts.gov.uk

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017: REQUEST FOR FORMAL EIA SCREENING OPINION**

**PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM, ACCESS,
LANDSCAPING AND ASSOCIATED INFRASTRUCTURE ON LAND BETWEEN
STEVENAGE ROAD AND THE A602 WYMONDLEY BYPASS (GRID REFERENCE:
520499, 227570)**

We write on behalf of our client, AGR Group ('AGR' or 'the Applicant') to formally request a Screening Opinion, as required under Regulation 6 of the Town and County Planning (Environmental Impact Assessment) (England) Regulations 2017 (the 'Regulations'), in respect of the above proposal (hereafter referred to as the 'Proposed Development'). The location of the site is shown on the Site Location Plan (WB-LP-001) enclosed with this letter.

This correspondence seeks confirmation from your Authority as to whether it considers the Proposed Development, outlined within this correspondence, constitutes Environmental Impact Assessment (EIA) development, as defined within the Regulations.

To assist you in adopting a Screening Opinion the subsequent sections of this correspondence provide relevant details on the site, its surroundings and the Proposed Development.

Site and Surroundings

As illustrated by the Site Location Plan and Site Layout Plan (WB-LP-001 and WB-PL-001), the Proposed Development would occupy a circa 0.75 hectare (ha) plot of land located between Stevenage Road and the A602 Wymondley Bypass. The grid co-ordinates of the Site are 520499, 227570.

The Proposed Development would be set in a grass field circa 400m to the west of Little Wymondley. More specifically it is bound to the:

- North by a wooded field boundary beyond which is Stevenage Road and thereafter agricultural fields.
- East by the same grass field within which the Proposed Development would be located and woodland, which forms the field boundary with Ash Brook, beyond which are agricultural fields.
- South by the A602 Wymondley Bypass beyond which are agricultural fields.
- East by isolated trees which form a broken-field boundary, beyond which is an agricultural field.

A pylon carrying high voltage transmission cables over sails the field within which the Proposed Development would be located. The Proposed Development has been off-set from this infrastructure.

The Proposed Development would utilise an existing field access off Steenage Road. Stevenage Road provides a connection to a priority junction with the A602 circa 300m to the west. The A602 links to a roundabout (Junction 8 of the A1 (M)) to the east and continues towards Hitchin to the west.

The closest sensitive receptors are row of residential properties located off a small side road which runs in parallel to Stevenage Road to the north-west of the Site. The nearest dwelling here is located circa 135m to the west of the main Site access, but closer to 200m away from the BESS infrastructure. There are other residential properties located further to the west within Ashbrook (circa 270m from the Site); in St Ippolyts to south-west of the Site at adjacent to Wymondley Substation (circa 570m away) and to the east along Stevenage Road (circa 440m away). There are three schools located within 1km of the site, these being Wymondley Junior and Mixed Infant School (circa 550m to the east); St Ippolyts CE Primary School (circa 660m to the south-west), and Kingshott (located 590m away to the north-west). It is also worthy of note that a public right of way (PRoW) bridleway (ref: 14 / 16) runs parallel to Ash Brook, circa 100m from the site.

The site is remote from ecological designations, Purnell Meadows Local Nature Reserve (LNR) is located circa 2.1km to the north-west, and Wain Wood Site of Special Scientific Interest (SSSI) is located circa 2.9km to the south-west.

The nearest listed building is the Grade II* Listed Wymondley House located circa 600m to the east. In addition two Grade II Listed Buildings (Jolly Tailor and The Croft) are both located circa 740m to the south and east respectively. The villages of St Ippolyts and Great Wymondley include further listed buildings and conservation areas which are circa 700m south and 800m north respectively.

The site is located entirely within Flood Zone 1, which means that there is less than a 1 in 1,000 probability of flooding in any year. Surface water mapping does illustrate that there is a low-risk of surface water flooding area along the very south-eastern edge of the Site (between 0.1% and 1% chance). Land to the east of the site, towards Ash Brook, is within Flood Zones 2 and 3. Neither the site nor surrounding local road network are within an air quality management area.

A review of the North Hertfordshire District Council online planning register has not identified any recent planning history on the Site.

Finally, in terms of planning policy, the Site is identified in the adopted North Hertfordshire Local Plan (2011-2031) Policies Map (Inset B) as being within the Green Belt (Policy SP5).

Description of the Proposed Development

The Proposed Development would consist of a Battery Storage Energy System (BESS) that would provide multiple services to the Distribution Network Operator (DNO) to enable them to manage the distribution network in a cleaner, efficient, and cost-effective way. It would store electricity during periods of excess renewable generation and then export this electricity back to the grid when there is a need, such as times of high electricity use.

Battery storage plays a crucial role in the energy strategy, providing National Grid with real-time balancing services to manage the escalating variable levels of supply and demand. By importing surplus intermittent renewable energy, especially during periods such as windless days, or during the night without solar power, batteries can store energy that would otherwise be lost. Moreover, in situations where fossil fuel sources, like traditional power stations are decommissioned, BESS can fill the production gap, averting potential blackouts and avoiding the need to generate energy from fossil fuels. It is important to note that the interconnected nature of the UK electricity network means issues in one region can have widespread implications on the entire Grid. Consequently, BESSs provide additional capacity to address system stress and frequency variations at both local and national levels.

BESS also provides valuable service to the local distribution network through continuous supply to the local network in times when the national grid is experiencing capacity shortage across the system. BESS therefore plays a crucial role in decentralising the grid, allowing power to be generated and stored in localised areas where it is needed. This also diminishes the reliance on centralised fossil fuel facilities, decarbonising the energy network, resulting in a cumulative reduction in CO₂ emissions.

An indicative layout of the Proposed Development has been enclosed with this letter (see drawing ref. WB-PL-001). This illustrates that the Proposed Development would comprise a compound containing the following infrastructure:

- 32 No. battery units;
- 16 No. power conversion systems;
- 8 No. ring main unit / transformer modules;
- A substation containing a main transformer, auxiliary transformer and associated disconnectors / circuit breaker and kiosk;
- A switchroom housing 6 No. rooms and ancillary cabinets;
- A control building housing control, operational infrastructure and office welfare facilities;
- CCTV and lighting;
- Access road; and

- Security fence and access gates.

The internal compound area around the infrastructure would comprise permeable materials, e.g., Type 1 compacted stone or shingle sized gravel, and be free draining. There would be an access road (finished in the same material as the compound) connecting to Stevenage Road. The access utilises the existing field access, but it is acknowledged that the indicative route does impact on existing trees. The compound would be off set from the existing woodland surrounding the field to protect and enhance existing landscape / biodiversity features. Furthermore, there is significant space around the compound to implement a create a robust landscaping scheme. These features have not been developed at the time of preparing this pre-application request, but would be formulated to support any forthcoming planning application.

The Proposed Development would be operated remotely and as such, there is no requirement for permanent lighting. All lighting would be downward facing and motion sensor activated, to minimise any light spill outside of the Site. Due to the operation of the Proposed Development, vehicle movements would be periodic and therefore it is the temporary construction period where vehicle movements would be greatest.

The cable route plan illustrates a potential route of connection between the Proposed Development and the Substation. This route would utilise the existing underbridge of the Bypass and is anticipated to require directional drillings to cross Ash Brook and associated level changes. There may also be a need for a temporary closure to the public right of way which also travels under the bypass during construction activities.

The full construction period is anticipated to take circa 12 months. The Proposed Development would be sought on a temporary basis for 40 years, at the point when the BESS first becomes operational (i.e. electricity connection becomes 'live'). Following this timeframe energy operations would cease, and the infrastructure would be removed.

Relevant Environmental Considerations

Regarding relevant environmental considerations resulting from the Proposed Development, the following should be noted:

Positive: The Proposed Development would contribute to energy security and support the move to low-carbon electricity generation through assisting the National Electricity System Operator (NESO) / DNO to manage grid problems associated with the intermittency of energy supplied from renewable energy technologies. It would also assist in mitigating against climate change as recognised by the declaration of a climate emergency. The location of the site is suitable owing to its distance from sensitive visual, noise or cultural heritage receptors and proximity to the point of connection. There would be very limited operational traffic movements (limited to occasional visits from a maintenance engineer) and the temporary construction traffic movements would also be limited by virtue of much of the equipment being prefabricated off-site. Finally, the Proposed Development would be located within flood zone one, and therefore would not be at risk of flooding. Regardless a suitable drainage scheme would be implemented at the site with most of the ground laid with permeable surfaces.

Negative: The type of development proposed has the potential to give rise to some environmental concerns in respect of effects on noise, ecology and landscape / visual Impact. The significance of which are considered below.

- **Noise:** A noise impact assessment would be prepared to support the application, however based on experience of other BESS schemes and distance to noise sensitive receptors (and intervening landscape features, including the A602) it is not considered that noise would result in a significant impact in line the relevant British Standard and other guidance. As set out above, the closest sensitive receptors are a row of residential properties located circa 135m to the west of the site access, with vegetation and Stevenage Road located in between. The A602 alongside blocks of woodland sit between the Site and the sensitive receptors in St Ippolyts to south-west of the Site. There are further blocks of woodland and roads located between the Site and the sensitive receptors in Wymondley to the east. The outcome of the noise impact assessment will detail necessary mitigation, if required, and therefore protecting the amenity of residential properties.
- **Ecology:** An Ecological Assessment (including extended phase one habitat survey and data record search) would be prepared in support of the future planning application. At this stage it is not known whether there would be a need for any species-specific survey work. As the proposal would require the removal / partial removal of some existing trees on the Site (primarily to facilitate construction of the access), an Arboricultural Assessment would be included within the prospective planning application to assess the impacts on trees. This would need to be mitigated through proposed landscaping which ensures a biodiversity net-gain is achieved to offset the removal of the existing trees. Due to the Site only being visited periodically by an engineer, the external lighting for the Site would only be activated on a motion sensor (i.e. it is not permanent lighting) and therefore, an assessment of lighting (including potential impact of species) is not considered necessary.
- **Landscape and Visual:** The Site is not within a designated landscape area. Nonetheless, the Site is well screened by vegetation from existing woodland blocks and semi-mature trees around the field boundary. It is therefore considered that the Proposed Development would have a limited, localised impact on views. As such, a Landscape and Visual Appraisal (LVA) would accompany the prospective planning application, which would address the Proposed Development's potential impact on the landscape character and / or visually.

Environmental Impact Assessment (EIA) Considerations

In accordance with the Regulations, the Local Planning Authority (the 'LPA') should determine whether the project is a type listed in Schedule 1 or Schedule 2. If the proposal falls within Schedule 1, an EIA is mandatory. If the proposal falls within Schedule 2, then it is for the LPA to consider whether it would be likely to have significant effects on the environment.

Schedule 1

The Proposed Development does not meet the requirements within one of the descriptions under Schedule 1 of the Regulations. Therefore, the Proposed Development is not Schedule 1 development.

Schedule 2

Schedule 2 of the EIA Regulations includes a table that sets out various categories of development that may require EIA. The table includes applicable thresholds and criteria, which if exceeded, mean that the development forms Schedule 2 development. Schedule 2 development is required to be screened against the criteria set out in Schedule 3 to determine if the development is likely to give rise to significant effects on the environment. If the Proposed Development is deemed likely to give rise to significant effects by virtue of its location, characteristics or potential impacts, EIA may be required.

The Proposed Development falls within Schedule 2 owing to it just exceeding the 0.5-hectare area threshold of Schedule 2 developments (site is circa 0.75ha). Battery storage projects are not specifically referenced in Schedule 2; however, they are a subset of energy generation. The MHCLG / DLUHC Environmental Impact Assessment Guidance (2014) states; *“In determining whether a particular proposal for development is included within one of the categories of development...local planning authorities and developers should have regard to...a wide scope and broad purpose.”* Hence, battery storage projects would be considered a subset of Schedule 2 Category 3 (a): *“Energy industry (a) Industrial installations for the production of electricity, steam and hot water”...* Applicable thresholds and criteria: *the area of the development exceeds 0.5 hectare.*

It is also worthy of note that the ‘indicative screening thresholds’ document contained in Planning Practice Guidance (PPG) identifies that for Category 3a the:

- Indicative criteria and threshold are: *“thermal output of more than 50MW. Small stations using novel forms of generation should be considered carefully.”* – the Proposed Development does not use a novel form of generation; and
- Key issues to consider: *“level of emissions to air, arrangements for the transport of fuel and any other visual impact.”* – the Proposed Development would not emit to air, is very limited in its transport movements and further consideration of visual matters is provided later in this letter.

As set out under paragraph 017 of PPG: *“Screening’ is a procedure used to determine whether a proposed project is likely to have significant effects on the environment. It should normally take place at an early stage in the design of the project...”* In line with the guidance, the project team has undertaken ‘screening’ at an early stage, however it is recognised that the technical assessment work which will support any forthcoming application has not been completed. On this basis a judgement of the likelihood for a significant effect must be made. However, Paragraph 018 of PPG does confirm that: *“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment.”*

The Site exceeds the above threshold. Accordingly, it is necessary to consider whether the development is likely to give rise to significant environmental effects by virtue of its location, characteristics or potential impacts. For completeness, we are aware that, in formulating a Screening Opinion, the relevant authority is required to have regard to the selection criteria for Screening Schedule 2 development, as contained within Schedule 3 of the EIA Regulations. The three subject areas within Schedule 3 are:

- 1) Characteristics of Development;
- 2) Location of development; and
- 3) Types and characteristics of the potential impact.

Each subject area has multiple sub-headings (effectively criteria) which, whilst extensive, have been set out below, together with a brief commentary as to how the Proposed Development measures against the relevant individual headings.

Characteristics of Development

- a) **Size and Design:** While the whole site would take up circa 2.5 hectares, the BESS compound would sit on circa 0.75 hectares of this, with the remaining circa 1.75 hectares available for proposed landscaping and biodiversity enhancements.
- b) **Cumulation with Existing Development:** There is limited proposed development in proximity of the site that would contribute to a cumulative effect on the surrounding area. On this basis, it is not considered that there is potential for any cumulative effects.
- c) **Natural Resources:** The Proposed Development would support the move to low-carbon electricity generation through addressing the intermittency and voltage issues associated with renewable energy technologies. The Proposed Development would not result in the loss of any sensitive land, soil, or water. In terms of biodiversity assets, an ecology survey would be carried out for the Site and an assessment made of the likely impacts. The need for further surveys would be identified and carried out if necessary. Furthermore, the scheme would seek to deliver biodiversity net-gains through landscape planting on the adjacent land.
- d) **Waste Production:** Operation of the Proposed Development would not result in any emissions or waste production. Waste arising from construction would typically be the case for all construction projects and would be readily recycled. Recycling facilities for lithium-ion batteries are becoming available in the UK and are set to increase with the move towards and rise in electric and hybrid vehicles. Any battery units that need to be replaced during the operational life of the Proposed Development would be recycled by appropriate licenced waste companies. As such, the Proposed Development is highly unlikely to result in significant environmental effects.
- e) **Pollution and Nuisances:** The impact most likely to give rise to concerns of pollution and nuisance is noise. However, as discussed above, this impact is considered to be negligible and only applicable to receptors to the south-east. The Proposed Development is bounded by screening along the field boundaries of the Site, which would assist in mitigating impacts to potential receptors and beyond.
- f) **Risk of Major Accidents and/or Disasters:** Proven, established technologies would be used within the development. The battery cells within the BESS undergo the strictest industry fire safety testing standards. During operation of the BESS facility,

the BESS units are constantly monitored to ensure appropriate performance, temperature, and overall safety. It is anticipated that a Battery Fire Safety Management Plan would be developed for the proposal once the detailed designs are understood (i.e. post-determination of the application) and that this could be secured via an appropriately worded planning condition. This document would set out the best practices and mitigation measures in relation to fire safety, which are (but not limited to):

- Equipment monitoring by a Battery Management System (BES).
- Procuring components that comply with all relevant legislation and best practice guidance at a time of design and implementation.
- Including automatic monitoring and control system.
- Offering to work with the local FRS to develop a tactical response that will minimise the risk in the event of fire and mitigate impacts.
- Production of a dedicated Emergency Response Plan, showing full understanding of hazards, risks, and consequences

As such, the Proposed Development is not considered likely to give rise to a significant risk of accidents. Moreover, as noted above, the Site is located within Flood Zone 1 (lowest risk) and not at risk of any other source of flooding, and as such is not considered as a flooding risk. The BESS is also not located in an area at risk of natural disasters or in a sensitive geopolitical area. Hence, it is considered that the Proposed Development would be highly unlikely to be at risk of man-made natural or man-made disasters.

- g) **Risks to Human Health:** The Proposed Development would not give rise to any impacts on water or result in any air pollution during its operation. The development itself would reduce the reliance on fossil fuel power stations that currently provide reactive power services to the NESO / DNO. This would aid in facilitating the continued expansion of renewable energy development in the UK and in achieving the goal of net-zero emissions. The positive environmental effects associated with reducing air pollution from the Proposed Development are evident. No other risks to human health have been identified.

Location of Development

- a) **Land use:** The Site comprises of agricultural land. The biodiversity mitigation measures that would be a part of the scheme would seek to produce a net-gain in ecological value, and is to be confirmed.
- b) **Local Natural Resources:** The Site comprises agricultural land and the Site itself is not covered by any statutory or local landscape, nature conservation or cultural heritage designations. There are no Ancient Woodlands situated in proximity to the Site. As noted above, ecological and arboricultural assessments where required would be undertaken to support the planning application and appropriate mitigation measures implemented.
- c) **Absorption capacity of the natural environment:** The Site of the Proposed Development is not within:
- i. wetland, riparian area, or river mouth;

- ii. natural coastal or maritime habitat;
- iii. mountain or forest area;
- iv. nature reserve;
- v. European nature conservation designation and is remote from all other nature conservation designation, with no impact pathways;
- vi. area known to exceed existing environmental standards; and
- vii. designated landscape of historic, cultural or architectural significance.

Types and Characteristics of the Potential Impact

- a) **Extent:** Given the scale of the development, any effects are likely to be limited to the Site itself. In the unlikely circumstances that effects impact the wider area, suitable mitigation will be proposed, including landscape and biodiversity measures.
- b) **Nature of the Impact:** Based on the information provided in this letter, it is considered that the Proposed Development's environmental effects are unlikely to be significant.
- c) **Transboundary Impacts:** The proposal does not span any borders or result in any air borne or water borne emissions. Hence, there would be no potential for transboundary effects.
- d) **Intensity and Complexity:** There are no complexities in either construction or operation of the development.
- e) **Probability of the Impact:** Whilst several of the environmental impacts set out above are considered possible, no likely significant environmental effects have been identified that cannot be effectively mitigated through design. As such there is a low probability that significant environmental impacts would occur.
- f) **The Onset, Duration, Frequency and Reversibility of the Impact:** The likely, onset, duration, and frequency of likely impacts is understood. The landscape and visual impact would be temporary, the Site would be well screened by retained existing vegetation on the field boundaries. Any mitigation measures (identified and prescribed through the LVA) would further decrease the likelihood of any visual impacts. Additionally, noise impacts would not be continuous. The main noise sources would be from the battery containers and inverters, which would not be in constant operation. The presence of the A602 and intervening landscape distance/features that sit between the Site and nearby receptors would likely mask any potential noise generated by the Site. The supporting Noise Assessment would identify any additional mitigation measures (e.g. acoustic screening). Regarding construction, the duration of impacts would be limited, and all main components would be prefabricated before being delivered to the Site. Hence, the construction period would be limited.
- g) **Cumulative Impacts:** As previously identified, it is considered that it is unlikely that there would be any nearby developments which the Proposed Development is considered to combine with to cause significant cumulative environmental effects.
- h) **Possibility of Reducing the Impact:** The potential effects in terms of local heritage assets, noise, landscape and visual would be mitigated through reasonable avoidance measures.

Based upon the above assessment, it is considered that significant environmental effects are unlikely to be experienced because of the Proposed Development. As such it is concluded that the Proposed Development is demonstrably not EIA development.

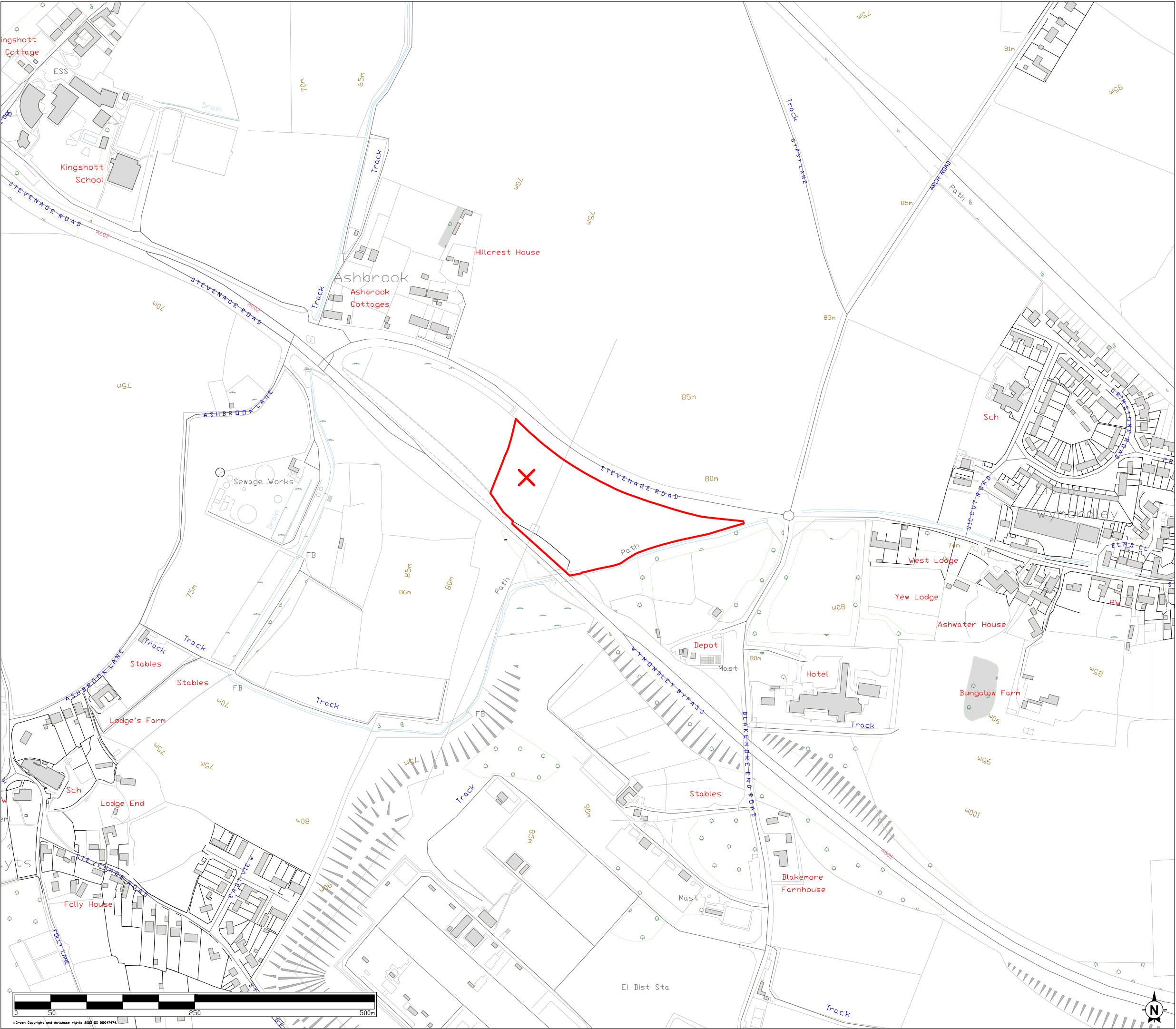
We trust that the contents of this letter, along with the enclosed plan, are self-explanatory and look forward to receiving your Screening Opinion within the statutory three-week period. In the meantime, please do not hesitate to contact the undersigned should you have any queries.

Yours faithfully

Andrew Barton

Andrew Barton
Associate Director on behalf of Axis

Enclosed: Site Location Plan, Illustrative Layout and Cable Route



Location Plan

REV	DESCRIPTION	DATE

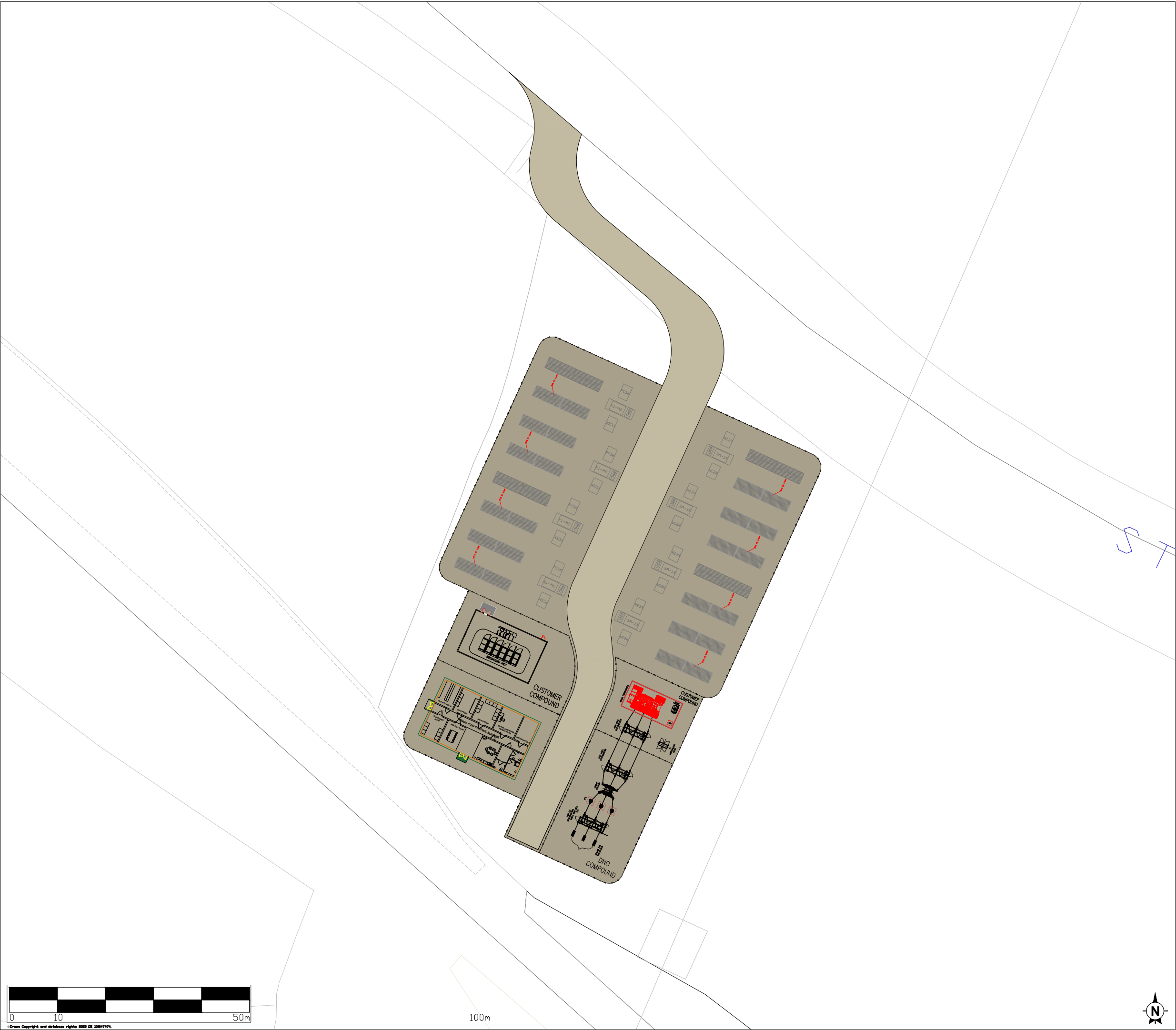
PROJECT Wymondley BESS	
DRAWING TITLE Location Plan	
DATE 14.01.25	SCALE 1:5000 @ A3
DRAWN EJ	CHECKED AG
DRAWING NUMBER WB-LP-001	

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AGR

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Positive Energy



Provisional Layout

REV	DESCRIPTION	DATE
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PROJECT
Wymondley BESS

DRAWING TITLE
Provisional Layout

DATE	14.01.25	SCALE	1:750 @ A3
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DRAWN	EJ	CHECKED	AG
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DRAWING NUMBER
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