



Our Ref: 3600-01/BH/ARB

04 April 2024

Planning and Development Management
North Hertfordshire Council
Gernon Road
Letchworth Garden City
SG6 3JF

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

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

**PROPOSED DEVELOPMENT OF A BATTERY ENERGY STORAGE SYSTEM,
ASSOCIATED INFRASTRUCTURE AND ACCESS N LAND OFF NEWNHAM ROAD,
BALDOCK, HERTFORDSHIRE (EASTING: 524111 / NORTHING: 236683)**

We write on behalf of our client, Balance Power Projects Limited (BPP) 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 Figure 1.

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 Proposed Development.

Site and Surroundings

As illustrated by the site location plan, the Proposed Development would be located to the north of Newnham Road set within the eastern corner of an agricultural field, circa 2.5 km east of Stotfold and circa 2.8 km north of Baldock. The site comprises part of a much larger agricultural field which is partially screened by vegetation along its eastern and southern boundaries and extends across the wider agricultural field on its western and northern boundaries. Circa 400 m west of the field is Baldock Services, situated off Junction 10 of the A1(M). To the north, east and south (beyond Newnham Road) are further agricultural fields. Overhead power lines supported by pylons over sail part of the site.

Access is proposed to be achieved from Junction 10 of the A1(M) and thereafter the A507 and Newnham Road. The existing access junction off Newnham Road would be utilised to accommodate temporary construction traffic and thereafter periodic vehicles for routine maintenance. There are no public rights of way within the site, the nearest (Caldcote and Newham 006) traverses through the agricultural field immediately to the east of the site.

The closest residential properties are situated circa 450 m northwest of the Proposed Development. Other properties are located off Newnham Road and Ashwell Road to the north east of the site at a greater distance. It is also worthy of note that a hotel is contained within the services circa 550 m to the west of the site. In terms of heritage assets there are several Grade II listed buildings which are located to the north west of the site. The closest Grade II listed building is 'Radwell Grange', which is situated circa 450 m northwest of the site. Additionally, there is a Scheduled Monument titled 'Ring ditch and enclosure' that is located circa 570m northeast of the site within Newnham, which is also designated as a conservation area.

The Site is located on land at lowest risk of flooding (Flood Zone 1) and is remote from ecological designations, the nearest being 'Stotfold Mill Meadows' Local Nature Reserve located circa 1.5 km west of the site. Thereafter 'Ivel Springs' Local Nature Reserve is situated circa 2 km south of the site.

Whilst the site is not located in the Green Belt, its boundary extends to the south beyond Newnham Road. A review of the agricultural land classification maps illustrate that the site is located on Grade 2 (Very Good) land. Furthermore the predictive best and most versatile land assessment maps illustrate that the site has a high likelihood of being best and most versatile land.

Description of the Proposed Development

The Proposed Development would consist of a BESS that would provide multiple services to the distribution network operator (DNO in this instance UK Power Networks) 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.

An indicative layout of the Proposed Development (see Figure 2) and a series of key component elevational plans are provided with this letter. The plans illustrates that the Proposed Development would include two separate compounds, so as not conflict with the existing power lines. Each has been described in turn below.

The northern compound would include:

- 1 No. Private Substation Transformer
- 1 No. DNO Room
- 1 No. Control Room and Welfare
- 1 No. 132kV Substation Area (including transformer, and other electrical infrastructure set within its own fenced compound)

- 2 No. Transformers

The southern compound would include:

- 48 No. Prefabricated containerised modular Battery Energy Storage Systems (BESS), grouped into fours and arranged in rows.
- 12 No. Inverter / transformer modules.
- 1 No. Storage Room

Both compounds would be surfaced in gravel and secured by fencing and gating with associated CCTV security cameras. There would be an access road connecting the compounds and to the existing junction off Newnham Road. The compounds would be off set from the existing field boundaries to protect and enhance existing landscape and biodiversity features. 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 grid connection from the Proposed Development would be to the Letchworth Grid Substation (132/33kV) off the B656 within Letchworth Garden City (please see Figure 1 enclosed with this letter). The connection would be constructed in existing roadways by a statutory undertaker through permitted development rights and therefore this element of the scheme is excluded from the application or assessment work.

The full construction period is anticipated to take circa 12 months. There may be a need for a temporary construction compound on land immediately next to the BSF. As this construction compound adjoins the land to which the future planning application will relate (i.e. red line) this element of the scheme benefits from permitted development rights and does not form part of the application.

The Proposed Development would be sought on a temporary basis for 40 years, at the point when the BSF first becomes operational (i.e. electricity connection becomes 'live'). Following this timeframe energy operations would cease the infrastructure would be removed and the Site restored to its present use and condition.

Relevant Environmental Considerations

With regard to 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 Grid / UK Power Networks (UKPN) to manage grid problems associated with the intermittency of energy supplied from renewable energy technologies. Whilst the site is currently visible from the bordering Newnham Road, existing hedgerows between the road and site would be allowed to grow to improve screening from the limited sensitive visual receptors in the wider area. Additionally, planting would be introduced within the site boundary as visual and biodiversity mitigation. The location of the site is suitable owing to its distance from sensitive visual or

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noise receptors, land beyond the Green Belt and proximity to the point of connection. There would be very limited traffic movements associated with the Proposed Development once operational. The only vehicular movements once the facility is operational would be occasional visits from maintenance engineers. Finally, the Proposed Development would be located within Flood Zone 1, and therefore would not be at risk of flooding. A suitable drainage scheme would be implemented at the site with the majority 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 ecology, arboricultural, landscape and noise. The significance of which are considered below.

- Noise: A noise impact assessment has been undertaken and provided as part of this EIA screening request. The assessment identifies that the Proposed Development will give rise to rating sound levels that do not exceed the measured background sound level in the area during the daytime and night-time, thus giving rise to a 'Low Impact'. Consequently, the assessment demonstrates that the Proposed Development will give rise to noise impacts that would be within the range of NOAEL of the NPPG England guidance. For ease of reference, the definition of No Observed Adverse Effect Level in PPG Noise is reproduced here: *"Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response. Can slightly affect the acoustic character of the area but not such that there is a change in the quality of life."* Since the Proposed Development conforms to British Standard and National Planning Policy requirements, it recommends that noise should not be a considered constraint to the planning application, providing that the plant is constructed and operated in accordance with the acoustic assumptions and recommendations set out within the report.
- Ecology: BBP have commissioned a Preliminary Ecological Appraisal (PEA) and Ecological Constraints and Opportunities Plan (ECOP). The documents have been submitted as part of the separate pre-application request and several recommendations have been made. It is anticipated that any recommendations would be followed as part of the Proposed Development. The report contains details of protected species which should be treated as confidential and must not be circulated publicly. An ecological assessment (including extended phase one habitat survey and data record search) would be prepared in support of the future planning application. Due to the site only being visited periodically by an engineer, the sites lighting would only be activated on a motion sensor (it is not permanent lighting) and therefore, any assessment of lighting (including potential impact of species) is not considered necessary. At this stage, the compounds and roadways have been designed (as far as possible) to be offset from the field boundaries so that these higher value habitats are unaffected.

A biodiversity net-gain calculation would be carried out to determine the pre- and post-development biodiversity units on a site. This would correlate with the illustrative landscape plan to ensure that a suitable biodiversity net gain score would be achieved. The calculation would be completed using the Biodiversity Metric (or an appropriate metric as agreed with the LPA Ecologist).

- **Heritage:** As identified in the site and surroundings sub-heading there are heritage assets within the surrounding area. As such, it is proposed that a Heritage Assessment is proposed to be prepared in support of the planning application. This will identify designated heritage assets including Listed Buildings, Registered Parks and Gardens, Conservation Areas and Scheduled Monuments within 1 km of the site boundary, aided by the data from the historic environment record. Thereafter site visits to assets which would potentially be impacted would be carried out. This would enable an assessment of potential direct and setting impacts upon heritage assets resulting from the development. Should it be necessary mitigation measures to avoid minimise or offset any adverse effects identified during assessment work would be proposed. The site is located on an agricultural field, which may offer archaeological potential and any programme of investigation would need to be discussed with the relevant officer. As such, impacts in relation to heritage assets are unlikely to be significant.
- **Landscape and Visual:** The Site is located within the countryside; however, the Site is not within a designated landscape, and the location of the Site is not considered to be highly sensitive in landscape terms. Views to the Site are limited due to the gently rolling topography and the pattern of existing vegetation along the eastern and southern boundaries of the Site and nearby vegetation from adjoining and nearby fields. Visual receptors within the immediate vicinity of the Site are therefore limited to users of the footpath along the field situated to the east of the Site. As mentioned previously, vegetative screening would be provided to assist with integrating and screening the Site. Once this vegetation has established, the views of the Site would be more screened and, consequentially, it could be considered that Proposed Development would have a limited, localised impact on views in the short- and long-term.

In light of the above, it is clear the environmental effects from the Proposed Development would be minimal and where possible reduced through mitigation methods. Hence, it can be concluded that the Proposed Development would not give rise to any significant effects on the surrounding environment.

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 exceeding the 0.5 hectare area threshold of Schedule 2 developments. Battery storage projects are not specifically referenced in Schedule 2; however, they are a subset of energy generation. MHCLG's 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."*

The Site exceeds the aforementioned 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 4.4 hectares, the BSF compound would sit on just 1.1 hectares of this, with the remaining 3.3 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. Whilst not existing, it is noted that there is an undetermined renewable energy scheme (ref: 22/00741/FP) circa 1.5km to the east of the site. However, 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, water or biodiversity assets.

Furthermore, the scheme would seek to deliver biodiversity net-gains through vegetative screening and mitigation methods.

- 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 referenced above, this impact is considered to be negligible and only applicable to receptors to the north west. The Proposed Development is bounded by screening along the eastern and southern 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, and it would be subject to stringent health and safety testing as part of the construction and commissioning works. The battery container units would contain fire monitoring and suppression technology in the unlikely event of a battery fire. 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 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding) and as such is not considered as a flooding risk. The Proposed Development 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 National Grid. This would aid in facilitating the continued expansion of renewable energy development in the UK and in achieving the goal of net-zero emissions by 2050. 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, but is likely to include the planting of species rich grassland or tree planting.
- 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.

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- 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 particular complexities in either construction or operation of the development.
- e) **Probability of the Impact:** Whilst a number 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. Whilst landscape and visual impact would be permanent, the Site would be well screened by existing vegetation on the eastern and southern boundaries and the provision of biodiversity net gain would enhance the screening of the site. The mitigation measures proposed within the plans would further decrease the likelihood of any visual impacts. Additionally, noise impacts would not be continuous. The main noise sources would be the ventilation systems on the battery containers and inverters, which would not be in constant operation. The biodiversity mitigation and woodland borders of the Proposed Development would reduce the noise impacts on receptors in the wider area. 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 there are no developments which the Proposed Development is considered likely 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.

3600-01/EIA-SCR
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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.

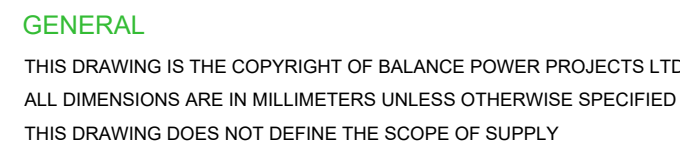
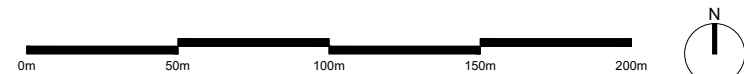
Yours faithfully

A solid black rectangular box used to redact the signature of Andrew Barton.

Andrew Barton
Associate

Enclosed: Figure 1 - Site Location Plan, Figure 2 –Illustrative Layout.

Cont'd./...



(1) N/A

(1) N/A

PR823 SG7 5ES 001

PROJECT ADDRESS
RADWELL BURY FARM_SG7 5ES

PROJECT TYPE
ENERGY DEVELOPMENT

DRAWING TYPE
LOCATION PLAN

CHECKED BY & APPROVED BY
C.VICK

REVISION
REV C

PAPER SIZE
A1

DRAWING PURPOSE PLANNING



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THIS DRAWING DOES NOT DEFINE THE SCOPE OF SUPPLY

(1) N/A

BATTERY CONTAINERS
INVERTER & TRANSFORMER MODULES
DNO ROOM
TRANSFORMER
PRIVATE SUBSTATION
WELFARE & CONTROL ROOM
STORAGE ROOM

PR853_SG7 5ES_101

PROJECT TITLE
RADWELL BURY FARM

PROJECT ADDRESS
RADWELL BURY FARM_SG7 5ES

23/02/24

PROJECT TYPE
ENERGY DEVELOPMENT

DRAWING TYPE
PROPOSED PLAN

L.GALE

CHECKED BY & APPROVED BY
C.VICK

1:1250

REVISION
REV C

PAPER SIZE
A1

PLANNING



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APPLICATION SITE

APPLICATION SITE BOUNDARY
10.8 ACRES APPROX.



GENERAL
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NOTES
(1) N/A

EQUIPMENT LIST
(1) N/A

PROJECT NUMBER
PR823_SG7 5ES_002

PROJECT TITLE
RADWELL BURY FARM

PROJECT ADDRESS
RADWELL BURY FARM_SG7 5ES

DATE
23/02/24

PROJECT TYPE
ENERGY DEVELOPMENT

DRAWING TYPE
AERIAL PLAN

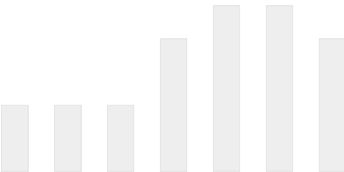
DESIGNER
L.GALE

CHECKED & APPROVED BY
C.VICK

SCALE
1:2500

REVISION
REV C

PAPER SIZE
A3



DRAWING PURPOSE
PLANNING