

30th October 2025

For the attention of Case Officer: Ben Glover, Senior Planning Officer, Major Projects.

North Hertfordshire District Council
Planning Control & Conservation
Council Offices, Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

By Email only

Dear Mr Glover,

Please find below some additional points I'd like to include in my objection in response to the planning application for the Westfield Energy Conservation Park.

APPLICATION: 25/01947/FP

AT: Land South Of A507 Near Cumberlow Green, Clothall Road, Clothall, Hertfordshire.

PROPOSAL: Battery Energy Storage System (BESS), ground mounted solar farm, associated infrastructure, access and landscaping.

Planning Objection: Westfield Energy Conservation Park

1 400kv Substation

The proposed development raises significant concerns on ownership, operation and decommissioning of the 2.4 ha 400kv Substation.

Lack of Clarity on Substation Ownership and Accountability

The application proposes a 400kV customer substation however, the planning documents do not explicitly state who will own or be accountable for this critical infrastructure.

The substation is described as part of the "Proposed Development" and is integrated with the solar farm and Battery Energy Storage System (BESS), but no legal or contractual ownership is disclosed.

The substation will connect directly to the National Grid's 400kV overhead line, yet there is no indication that National Grid will assume ownership or operational responsibility.

The site is to be remotely monitored and unmanned, with only weekly maintenance visits. This raises concerns about emergency response, safety, and long-term accountability.

A 40-year operational period is proposed, after which the site will be decommissioned.

However, the responsibility for decommissioning the substation is only implied to rest with the applicant and not legally secured.

Planning decisions should not be made without clear identification of the party responsible for operating, maintaining, and decommissioning high-voltage infrastructure.

Insufficient Planning Controls and Oversight

The Planning, Design and Access Statement confirms that the substation will be located adjacent to the National Grid's 400kV transmission line and will facilitate grid connection.

Despite this, the planning application:

Does not include any binding agreement or planning condition that secures ownership or operational responsibility.

Does not clarify who will be responsible for compliance with national safety standards, environmental regulations, or emergency protocols.

Fails to address how risks associated with high-voltage infrastructure will be managed, particularly in an unmanned, remotely monitored site.

This omission undermines the robustness of the planning application and leaves significant gaps in oversight and accountability.

Risk to Public Safety and Local Environment

The substation is located near public rights of way, residential properties and ecologically sensitive areas. The Environmental Statement acknowledges that the infrastructure will be screened by vegetation and topography, but:

There is no detailed emergency management plan specific to the substation.

The site will be unmanned, and access is limited to light vehicles once per week.

The substation includes transformers, switchrooms, and harmonic filters with busbars up to 12m in height, yet no fire safety or incident response protocols are detailed beyond generic water tanks for the BESS.

Given the scale and voltage of the infrastructure, the lack of clear operational responsibility poses a risk to public safety and the surrounding environment.

Planning Precedent and Policy Compliance

The substation is located within the Rural Area beyond the Green Belt, as defined in the North Hertfordshire District Local Plan. While the Environmental Statement claims the infrastructure is reversible and will be removed after 40 years, this is not secured by any enforceable mechanism.

The decommissioning plan is proposed to be secured by condition, but no details are provided on enforcement or funding.

There is no assurance that the land will be restored or that the substation will be removed if ownership or operational responsibility is unclear.

The setting of planning conditions rely on the applicant (Lightrock Power) being responsible for decommissioning. A transfer of ownership would complicate enforcement and accountability, potentially requiring new legal mechanisms or amendments to planning conditions. This introduces uncertainty and weakens the Council's ability to ensure compliance.

If the substation were to be owned by National Grid, several implications would arise both operational and regulatory because of the change in responsibility.

The National Grid would become the owner and operator, so they, not the original developer (Lightrock Power)—would be responsible for decommissioning which could mean a different timeline for decommissioning and a potential extension of operational life beyond 40 years if deemed necessary for grid infrastructure.

If National Grid takes over, they could apply to vary or remove this condition and argue that the substation is now critical national infrastructure and should remain indefinitely.

National Grid substations are typically permanent installations. Decommissioning may no longer be appropriate or feasible, especially if the substation becomes a hub for other energy projects and/or it supports regional grid stability.

The planning application upsells the 'temporary' nature of the development with a defined operational lifespan of 40 years, after which the site will be decommissioned and restored to agricultural use.

Transferring the substation to National Grid would likely result in the infrastructure becoming permanent, contradicting the basis on which the application is assessed.

Local communities have been engaged with the proposal on the understanding that it is reversible. Any change that risks permanent infrastructure must be subject to full public consultation and a new planning assessment. Proceeding without this would erode public trust in the planning process.

This risks setting a precedent for permanent industrialisation of rural land under the guise of temporary development if a planning application that lacks a legally binding statement of ownership and responsibility were to be approved.

2 Glint & Glare Assessment

Impact on recreational horse riders using public rights of way and local rural routes in the vicinity of the development.

Lack of Assessment for Equestrian Receptors

The Glint and Glare Assessment submitted with the application does not include any specific consideration of bridleways or equestrian users, despite the rural location and known use of nearby tracks and unclassified roads by horse riders. This is a significant omission, given that horses are highly sensitive to sudden light changes and visual stimuli.

Safety Risks from Glint and Glare

While the report concludes that there is no glare on footpaths FP1 and FP2 and only low-intensity ‘green glare’ on the A507, it fails to assess the potential impact of even low-level glare on horse riders. Unlike vehicle drivers, horse riders are exposed and vulnerable, and even minor visual disturbances can cause horses to spook, leading to serious safety risks.

Exclusion of Minor Routes

The assessment excludes unclassified roads and minor tracks from modelling, citing low traffic volumes. However, these routes are often used by recreational riders, especially in rural Hertfordshire. The assumption that glare impacts are negligible on these routes does not account for the unique risks posed to equestrian users.

Insufficient Mitigation for Equestrian Safety

Although the proposal includes hedgerow planting and mesh fencing to mitigate glare, there is no specific provision to protect horse riders from visual disturbance. The absence of targeted mitigation measures—such as enhanced screening along bridleways or signage warning of potential glare fails to address the needs of this user group.

Impact on Rural Amenity and Access

The development risks undermining the rural character and recreational value of the area for horse riders. The presence of large-scale solar infrastructure and associated fencing may deter use of nearby routes, reducing access to safe and enjoyable riding environments.

3 Noise Impact Assessment

The Noise Impact Assessment fails to consider the impact of operational and construction noise on non-residential recreational users, including walkers, cyclists, and horse riders, who regularly use the surrounding countryside and public rights of way.

Recreational Users Not Assessed

The Noise Impact Assessment focuses exclusively on residential receptors, omitting any consideration of outdoor users such as those on bridleways, footpaths, and rural lanes. This is a significant oversight given the rural location of the site and the presence of public rights of way (PRoW) in close proximity to the development.

Sensitivity to Noise in Tranquil Settings

Walkers, cyclists, and horse riders seek out quiet rural environments for recreation and wellbeing. The introduction of mechanical noise from transformers, inverters, and battery cooling systems—particularly during construction, risks undermining the tranquillity and amenity value of the area. Horses, in particular, are highly sensitive to unfamiliar sounds, and sudden or tonal noise can pose a safety risk to riders.

Construction Noise Impacts

The report states that construction noise is not expected to cause significant impacts due to distance from residential receptors. However, construction activities will occur near PRow and unclassified roads, which are commonly used by recreational users. The absence of assessment for these groups means that temporary but potentially disruptive impacts have not been properly evaluated.

No Mitigation Proposed

There are no mitigation measures proposed to protect or inform recreational users. This includes:

No acoustic screening along PRow

No signage or temporary diversions during construction

No consideration of peak usage times for recreational routes

Planning Policy Context

The National Planning Policy Framework (NPPF) encourages the protection of areas of tranquillity and the promotion of healthy lifestyles through access to green spaces. The failure to assess and mitigate impacts on recreational users is inconsistent with these principles.

In light of the extensive and unresolved concerns outlined above with regards to the Substation, Glint & Glare and Noise Assessments along with the concerns I have previously made in my objection of the 28th September 2025 regarding this development, I urge North Hertfordshire District Council to REFUSE this application.

I would be grateful if you could confirm receipt of this letter and its upload to the planning portal.

Yours sincerely,

Morag Phipson
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