

To: Ben Glover
North Herts District Council

Re: Westfield Energy Conservation Park – Planning Application 25/01947/FP

Dear Mr Glover,

I am writing to formally object to the proposed Westfield Energy Conservation Park development and to ask that my concerns are taken fully into account when determining Planning Application 25/01947/FP.

Having reviewed the additional information relating to the Road Safety Audit, highways and Flood Risk Assessment, I remain strongly opposed to the development.

My objection is not based upon opposition to renewable energy. It is based upon whether a development of this industrial scale, incorporating substantial solar infrastructure and battery energy storage, is appropriate for this particular rural location and whether the risks and impacts identified have been adequately addressed.

Scale, character and loss of agricultural land

The proposed development represents a significant industrialisation of an established rural landscape.

Its scale, associated infrastructure, access requirements and battery storage installations would fundamentally alter the character of the area, result in the loss of productive agricultural land and adversely affect the amenity currently enjoyed by local residents and visitors.

The question should therefore not simply be whether renewable energy development is desirable, but whether **this development is appropriate in this location and at this scale.**

I do not believe that has been demonstrated.

A507 and construction traffic

I remain particularly concerned about the suitability of the local highway network for the proposed construction traffic.

Temporary traffic signals are proposed at the sharp bend west of Cottered during an estimated 18-month construction period.

This is already a constrained and busy section of the A507, with narrow carriageways, residential properties and driveways close to the road. The effect of temporary signals on residents, businesses, normal traffic flows and, importantly, emergency vehicle access requires much more detailed consideration.

The fact that a 7.5-tonne weight restriction was introduced on the A507 in August 2024 should itself raise serious questions about the suitability of this route for the level of HGV construction traffic associated with a project of this size.

The information provided does not, in my view, adequately address the duration and operation of the proposed signals, peak-period congestion, likely queue lengths or appropriate contingency arrangements.

A507/Cromer Heath access

I am equally concerned about the proposed primary construction access at the junction of the A507 and Cromer Heath.

The submitted information anticipates approximately one HGV movement every 15 minutes for a period of six to eight months and approximately every 30 minutes over the wider duration of the project.

I often use this junction; the sharp bend and restricted visibility already make turning across the westbound carriageway onto Cromer Heath difficult, particularly in poor weather or lighting conditions.

School buses also use this route, while Cromer Heath itself is narrow and passing can already be difficult when larger vehicles are present.

Introducing this volume of HGV movements therefore requires particularly robust evidence that the junction and surrounding road network can operate safely.

I would ask the Council to satisfy itself, through independent highways assessment where necessary, that the proposed visibility splays, traffic management arrangements and construction vehicle movements are genuinely safe rather than relying solely upon the applicant's assessment.

Existing flooding and drainage

Flooding is not a theoretical concern in this area.

The road around the River Beane crossing of the A507 and Cromer Heath has flooded regularly during recent winters. In view of the predictions that extreme weather events are more likely due to global warming, the frequency and extent of flooding will only increase further.

Against this background, I am very concerned that the proposed drainage strategy is insufficiently robust for a development of this scale, particularly over its full operational lifetime.

The applicant refers to infiltration testing undertaken at four locations to support the proposed use of soakaways. Given the size of the site, I question whether four test locations provide sufficiently representative evidence of infiltration conditions across the entire development.

Variations in soil conditions could result in significantly different infiltration performance in different parts of the site.

I would therefore ask that the Council and relevant flood authority independently satisfy themselves that the testing methodology, assumptions, climate-change allowances, hydraulic calculations and resulting drainage capacity are sufficiently conservative and representative before any determination is made.

River Beane, groundwater and water quality

The proximity of the River Beane and the underlying chalk aquifer makes protection of water quality particularly important.

The applicant refers to lined storage, shut-off valves and containment measures. However, these systems remain dependent upon appropriate design, maintenance, inspection and operation throughout the life of the development.

The Lead Local Flood Authority also requested a site-specific water-quality assessment because a Simple Index Approach may not adequately reflect the particular risks associated with battery storage and substations.

I therefore believe the Council should require clear evidence that the Environment Agency and other relevant bodies are satisfied with the proposed protection of groundwater and surface water.

Battery Energy Storage System

The proposed Battery Energy Storage System creates a further issue which deserves particularly careful consideration.

Residents have legitimate concerns about the consequences of a significant BESS fire, including the management of contaminated firewater and the potential for pollutants associated with a fire to enter surrounding land, drainage systems, groundwater or the River Beane.

The issue is magnified by the scale of the proposed installation and the number of battery storage units involved.

I would therefore ask the Council to require robust evidence addressing emergency response, firewater containment, pollution prevention, system failure and the potential consequences of a significant incident before reaching its decision.

The proximity of the River Beane and the chalk aquifer supplying water within North Hertfordshire makes this especially important.

Long-term effectiveness of mitigation

A recurring concern throughout the application is the reliance placed upon mitigation measures.

Vegetation, filter drains, soakaways, containment systems and other drainage measures may work as designed when initially installed. That does not necessarily demonstrate that they will continue to perform effectively for the full lifetime of the development.

Drainage can become blocked, vegetation can deteriorate and systems can fail.

The Council should therefore consider not merely whether mitigation measures are proposed, but **how their effectiveness will be monitored, maintained and enforced throughout the operational life of the site and what happens if those measures fail.**

Cumulative concern

Individually, each of these matters deserves proper scrutiny.

Taken together, however, they present a much broader question about the suitability of the site itself.

We are being asked to accept a very substantial industrial energy development within a rural environment, supported by a highway network that already has significant constraints, in an area which already experiences flooding and close to environmentally important water resources.

The potential consequences should not be dismissed simply because individual mitigation measures have been proposed.

Where there remains uncertainty over highway safety, drainage, groundwater protection, BESS firewater containment or the long-term effectiveness of mitigation, I believe those matters require robust and, where appropriate, independent verification before the application is determined.

I therefore maintain my objection to Planning Application 25/01947/FP.

I would also welcome the opportunity to meet the planning officer or relevant members of the planning team **on site**. I believe seeing the A507/Cromer Heath junction, the surrounding roads, the proximity of the River Beane and the scale and rural character of the proposed site would provide important context that cannot be fully appreciated from plans and technical reports alone.

Thank you for considering my representation.

Yours sincerely,

Susan Lewis