

Bundle Planning Committee 21 October 2024

Agenda attachments

Front Sheet Planning Committee 21st October 2024

2024-10-21 Planning Committee Agenda

- 1 Apologies for absence
 - 2 Declarations of interest on any item on the Agenda
 - 2.a Disclosable pecuniary interests they or their spouse/partner have in any matter which is to be considered at this meeting
 - 2.b Members must also declare any other pecuniary or non-pecuniary interests they have in any matter to be considered at this meeting.
 - 3 To confirm the Minutes and appendices of the meeting held on Monday 7th October 2024
- Planning Committee Minutes 7th October
- 4 To adjourn the meeting for members of the public to address the Committee (if any) in accordance with Standing Order 1 d
 - 5 To discuss the following consultation
 - 5.a To discuss the St Albans District Council: Publication of the draft St Albans Local Plan 2041 (Regulation 19 Technical Consultation)
 - 6 Planning Applications
 - 6.a 24/1242/HSE - 26 Craigweil Avenue, Radlett – Proposal: Retrospective application for retention of side rooflight
 - 6.b 24/0669/HSE - 32 The Avenue, Radlett – Proposal: Single storey side extension
 - 6.c 24/1250/VOC - 25 The Ridgeway, Radlett – Proposal: Application for variation of conditions 2 (Plans) and 4 (Materials) to allow for fenestration and materials changes following grant of planning permission 22/2144/HSE
 - 6.d 24/1258/HSE - 148 Watling Street, Radlett – Proposal: Installation of replacement roof, windows and doors to existing rear conservatory
 - 6.e 24/1259/HSE - 77 Newberries Avenue, Radlett – Proposal: Single storey side and rear extension following conversion of garage to habitable space and erection of front porch
 - 6.f 24/0977/VOC - Wild Acre, Common Lane, Radlett – Proposal: Application for variation of condition 9 (drawings / plans) to allow for revised ground floor plan and side elevation to show air conditioning unit following grant of planning permission 18/2032/FUL
 - 6.g 24/1277/HSE - 12 Beagle Close, Radlett – Proposal: Front porch extension and alterations to fenestration
 - 6.h 24/1238/FUL - 45 Newberries Avenue, Radlett – Proposal: Demolition of existing bungalow and garage and erection of replacement 4x bed bungalow including accommodation at loft level and replacement detached double garage
- For information: Planning Applications of the following type: - Certificate of Lawful Development (Existing) CLE, Certificate of Lawful Development (Proposed) CLP and Listed Building Consent LBC.
- 7
 - 7.a 24/1267/PD42 - 16 Kendals Close, Radlett – Proposal: Single storey rear extension to replace existing. Depth: 6m, Height: 3.7m, Eaves: 3m
 - 8 Planning decisions by Hertsmere Borough Council
 - 8.a 24/1010/HSE - 31 Christchurch Crescent – HBC decision was Grant Permission – APC comment was No Objection

- 8.b 22/2149/OUT - Organ Hall Farm And Land, Theobald Street, Borehamwood – HBC decision was Grant Permission – APC comment was Object
- 8.c 24/0911/FUL - 32 Links Drive, Radlett – HBC decision was Grant Permission – APC comment was Object
- 8.d 24/0599/HSE - 49 Watford Road, Radlett – HBC decision was Grant Permission – APC comment was No Objection
- 8.e 24/1054/HSE - 2 The Drive, Radlett – HBC decision was Grant Permission – APC comment was No Objection
- 9 Date of next meeting Monday 4th November 2024

Aldenham Parish Council



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Date: 16th October 2024

To: All members of Planning Committee

Dear Councillor

A Meeting of the Planning Committee will be held on Monday 21st October 2024.

At the Radlett Centre, 1 Aldenham Avenue, Radlett, WD7 8HL at 7.30pm.

The Agenda is below.

All members of the Public & Press are welcomed to join the meeting as detailed above. There is a session titled, *To adjourn the meeting for members of the public to address the Council*. During this session, you may address the Council regarding any items on the agenda. This agenda item has a time limit of 10 minutes. Each person can speak for a maximum of three minutes.

Yours sincerely,

Peter Evans
Council Manager

Members of the Planning Committee

Councillors: S Khawaja, E Samuelson, S Benjamin, C Woolf, S Howard, W Susman



Agenda Planning Committee

Date 21/10/2024
Time 19:30 - 21:30
Location Meeting Room 2, The Radlett Centre, 1 Aldenham Avenue, Radlett WD7 8HL
Chair Cllr S Khawaja
Explanation Notice is hereby given that a meeting of the Planning Committee to be held on Monday 21st October 2024 at 7.30pm in Meeting Room 2 at The Radlett Centre. Members are hereby summoned to this meeting and reminded that they have a duty to state a Declaration of Interest prior to the appropriate agenda item.

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Installation of replacement roof, windows and doors to
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6m, Height: 3.7m, Eaves: 3m**

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- 9 Date of next meeting Monday 4th November 2024**



ALDENHAM PARISH COUNCIL

DRAFT Minutes Planning Committee

Date 07/10/2024
Time 19:30 - 21:30
Location The Douglas Hicks Room, Radlett Centre, 1 Aldenham Avenue, Radlett WD7 8HL
Chair Cllr S Khawaja
Attendees Cllrs E Samuelson, W Susman, S Benjamin, S Howard & G Taylor (Co – Opted Member)
Officer S Heighton (Admin OS & Planning)
There was also 4 members of public present

1 Apologies for absence

Minutes:

Apologies were received from Cllr C Woolf.

2 Declarations of interest on any item on the Agenda

2.a Disclosable pecuniary interests they or their spouse/partner have in any matter which is to be considered at this meeting

Minutes:

None.

2.b Members must also declare any other pecuniary or non-pecuniary interests they have in any matter to be considered at this meeting.

Minutes:

Committee members declared a pecuniary interest in the agenda item, 5.m, 24/1128/FUL, Children's Play Area, Phillimore Recreation Ground, Gills Hollow, Radlett as this is APC's planning application.

3 To confirm the Minutes and appendices of the meeting held on Monday 16th September 2024

Minutes:

The minutes of the meeting were confirmed and signed by Cllr S Khawaja as a true record of that meeting.

4 To adjourn the meeting for members of the public to address the Committee (if any) in accordance with Standing Order 1 d.

Minutes:

Cllr S Khawaja suspended standing orders so that members of the public present could address the Committee. Two members raised concerns about agenda item 5.n, 24/1146/VOC - 14 Letchmore Road, Radlett, one member raised concerns about agenda item 5.l, 23/1508/OUT - Land Rear of Electricity Station, Hilfield Lane, Aldenham and one member raised concerns about agenda item 5.h, 24/1183/HSE - Chase Lodge, Gills Hill Lane, Radlett. Members of the Committee asked questions for clarification before the members of public were thanked for their attendance and standing orders were then resumed. It was then agreed that these items will be brought forward and 5.n will be first, followed by 5.l and then 5.h.

5 Planning Applications

5.a 24/1165/HSE - 54 Shenley Hill, Radlett – Proposal: Conversion of loft to habitable room with hip to gable roof alterations, increase in ridge height and rear dormers. First-floor rear infill extension

Minutes:

Object --

- a) The proposed building is too close to the boundary with No 56 at first-floor level as it is less than 2m. This contravenes the Radlett Neighbourhood Plan Design Code E – Spacing Between Building & Boundary.
- b) The increased ridge height, with the hip-to-gable conversions on both sides, will have a significant impact on the gap between 54 and 56 Shenley Hill, as the existing spacing to the boundary is just over 1m. The height of the development will raise the full height of the roof from the eaves and would be overbearing at 8.25m, contrary to the Radlett Neighbourhood Plan Design Code B - Ridge Height.
- c) The application does not comply with SADM30 Design Guide E, in terms of scale, mass and bulk and is considered to be an overdevelopment of the site.
- d) The Velux windows to the front of the property are not usually acceptable to Hertsmere.

5.b 24/1158/HSE - The White House, Waterside, Radlett – Proposal: Demolition of existing entrance porch and

construction of replacement entrance porch; two storey side extension; single storey rear extension to include bi-folding doors with roof terrace over. Insertion of 2x rooflights to front elevation and existing garage, removal of chimney stack and alterations to fenestration (Revised application)

Minutes:

No Objection

- 5.c 24/1135/FUL - Haberdashers Askes Boys School, Butterfly Lane, Elstree, Borehamwood – Proposal: Demolition of the existing Bates Building and erection of a replacement dining building, as well as alterations to the existing modern foreign languages (MFL) building to create a pastoral entrance hub, with associated landscaping scheme including a cloister, the removal of car parking, and utilising existing access from Butterfly Lane**

Minutes:

No objection pending approval by the landscape, heritage and conservation officers. The Archaeological Written Scheme of Investigation must also be submitted and approved by Hertsmere.

- 5.d 23/1803/FUL - 1 Loom Lane, Radlett – Proposal: Demolition of existing house and outbuildings to facilitate construction of 2 x dwellings (1 x 3 bed and 1 x 5 bed) to include accommodation at basement level, with associated landscaping, parking and 2 x detached garages with mezzanine level. (Revision of application reference 20/0422/FUL**

Minutes:

Object --

- a) The property is in a Conservation Area and this proposal would not enhance the character or appearance of the area. This is contrary to SADM29.
- b) There have been no amendments to the proposed scheme since the previous advice letter.
- c) The application does not comply with SADM30 Design Guide E, in terms of scale, mass and bulk and is considered to be an overdevelopment of the site.

- 5.e 24/1180/HSE - 5 Watling Knoll, Radlett – Proposal: Construction of part single, part two storey rear**

extension with associated roof alterations, alterations to fenestration and new hard landscaping to rear garden

Minutes:

No Objection

5.f 24/0923/FUL - 18 Goodyers Avenue, Radlett – Proposal: Demolition of existing dwelling and erection of three storey detached 5x bed dwelling including accommodation at loft level, with solar panels, new vehicular access and front boundary wall alterations with automated gate. (AMENDED PLANS RECEIVED: 17/08/2024 - ridge height reduced, front dormers re-positioned, fenestration altered, front boundary treatment and front landscaping revised)

Minutes:

Object --

- a) The property contravenes the boundary spacing at ground and first floor levels, which is in contrary to the Radlett Neighbourhood Plan Design Code E - Spacing between building and boundary and also the Hertsmere Design Guideline D 9.5.2 paragraph E.
- b) SADM30 is breached in terms of scale, mass and bulk, considered to be an overdevelopment of the site and its appearance on the street scene.
- c) The rear gardens at this part of Goodyers Avenue slope down away from the rear of the houses, therefore the step-free patio at ground floor level, would become a raised terrace, liable to give rise to overlooking of neighbours' rear privacy spaces.
- d) This development would not fit comfortably within a 45° drawn for either neighbour's windows. Furthermore, its height would give rise to overlooking of the neighbours' rear gardens.
- e) The 2m boundary spacing is breached, which is contrary to The Radlett Neighbourhood Plan Design Code E - Spacing between building and boundary. Also, Hertsmere Design Guidelines D 9.5.2 para 4.
- f) The alterations to the green front boundary would not be consistent with the open street scene, which is contrary to the Radlett Neighbourhood Plan Design Code D - Front Gardens.
- g) The front gate is contrary to Radlett Neighbourhood Plan Design Code D - Front Gardens
- h) The glass in the side windows must be obscured glass to prevent overlooking.

i) There is insufficient car parking provided as a property of this size would need 4 car parking spaces.

5.g 24/1190/HSE - 53 Oakridge Avenue, Radlett – Proposal: Part single; part two-storey side/rear extension and roof extension with two rear dormer windows (following demolition of the side garage and part of the rear dwelling); single storey front extension including canopy (following demolition of the existing porch and front extension); new central first floor front window; removal of ground floor side window and replacement with a door and removal of side chimney

Minutes:

Object --

- a) The boundary spacing with 51 Oakridge Avenue is breached as it is under 2m, which contravenes the Radlett Neighbourhood Plan Design Code E - Spacing between building and boundary.
- b) The rear dormer windows would give rise to overlooking of neighbours' gardens.
- c) The final disposition of the verdant nature of the front garden has not been included.
- d) This application does not comply with SADM30 Design Guide E, in terms of scale, mass and bulk and is an overdevelopment of the site and the nature of the street scene.
- e) The roof would have a larger crown area and crown roofs are not normally acceptable.

5.h 24/1183/HSE - Chase Lodge, Gills Hill Lane, Radlett – Proposal: Construction of two storey front extension to include front gables and suspended front portico following demolition of existing portico. Part single, part two storey rear extension to include first floor balcony and construction of 1x rear dormer following removal of 2x existing dormers. Single storey side extension to garage and first floor side extension including extension to second floor space. Alterations to roof to include insertion of 2x front rooflights. Alterations to fenestration and rear patio

Minutes:

Object --

- a) The new garage being built is on the boundary with the property Oak Views and the spacing on the Hillside side is below the required 1m. This contravenes the Radlett

Neighbourhood Plan Design Code E - Spacing between building and boundary policies and Hertsmere Design Guide D 9.5.2 para E.

b) The loss of light by the Oak View property will be contrary to policy SADM30.

c) The rear balcony will give rise to overlooking the neighbours' properties, as might the proposed two large windows at second floor level at the rear of the house, which should be obscured to prevent overlooking.

d) The patio is too high, and should be seen as a terrace.

5.i 24/1173/VOC - South Medburn Farm, Watling Street, Elstree, Borehamwood – Proposal: Application for variation of condition 2 (plans) to allow for layout and design changes following grant of planning permission 23/0635/FUL

Minutes:

No Objection - The Committee requests the committee to consider apportioning some S106 funds for a cycle lane between Radlett and Elstree going past Medburn Farm and stated in the Radlett Neighbourhood Plan figure 19.a.

5.j 24/1211/OUT - Land South Of, Shenley Hill, Radlett – Proposal: Outline permission (with all matters reserved except for means of access) for the erection of up to 195 new homes (50% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access, landscaping and parking

Minutes:

Object –

APC resubmits its original reasons for objecting in full.

a) The proposals would be contrary to Green Belt legislation, NPPF2021, which applies to the whole site, which comprises agricultural land with no previous development [The site was previously protected by Hertsmere as a Landscape Protected Area, in Local Plan 2003]. In the Hertsmere Local Plan 2012-2027, the site is protected by Policy SADM10, Biodiversity and Habitats and a Regionally Important Geological site [RIGS] – a source of rare Hertfordshire Puddingstone; the southern part of the site is protected as a Local Nature Reserve and is where bluebells are found. The site is a very successful feeding and breeding area for over 40 species of birds, as well as small mammals, butterflies, deer and foxes.

b) No Very Special Circumstances exist or have been shown to justify release from the Metropolitan Green Belt. The land is agricultural land Grade 3b. The proposals would undermine the site's contribution to the countryside character of Watling Chase Community Forest. The development's access road on Theobald Street would cut through a listed Wildlife Site and bluebell wood, which lies alongside Theobald Street. This would be highly detrimental to the movement of land animals, deer, badgers, foxes etc. Road access from Radlett to the site would be lengthy as, other than a new footpath linking to Williams Way, both routes are a long way round for vehicles, both via Shenley Hill and via Theobald Street and that on Shenley Hill is particularly dangerous.

c) The site is not an infill, but an outward extension to the urban area of Radlett, reducing the vital area of open countryside space between the settlements of Radlett, Borehamwood and Shenley.

d) There would no direct integration of the site into Radlett.

e) The Radlett Neighbourhood Plan Character Assessment states that, for the whole of Radlett, in 2016, the average number of dwellings per hectare was 11. By building upwards, by being more closely spaced and with reduced parking and amenity spaces, this development differs from Radlett by accommodating around 36 dwellings per hectare.

f) The Radlett Neighbourhood Plan states that one of its visions and objectives (3.1), is 'to promote the protection and positive use of the Green Belt by providing more opportunity to access it by foot, horseback and bicycle. The RNP vision was to 'Protect and enhance the leafy and biodiverse nature of Radlett's streets, neighbourhoods and open countryside.'

g) Such a significant increase in Radlett's housing, the largest for 50 years, will no doubt give rise to further pressures on local infrastructure, and this point was made in our objections to the draft Local Plan. Highways are already hugely congested particularly at peak times leading into and out of Radlett. This would increase significantly with the scheme providing for the levels of car parking required in the design guide.

Other infrastructure that would need improving to accommodate this volume of new housing would be:

1. Schooling, (increasing need for a suitable secondary school as secondary schools at present are only found in Bushey, Borehamwood and Watford. The plans do not show an extension to the buildings at Newberries Primary School only

additional playing fields. Increased spaces for pupils will no doubt be required by the provision of so much family housing)

2. A larger doctor's surgery in Radlett (the application refers to Medical centre but doesn't say what type or whether a provider wants and has funding for this location see below)

3. Increased car parking provision in Radlett, both for shops and station

4. New cycle routes (although cycling from Radlett to this site is exceptionally difficult for many due to the steep nature of Shenley Hill).

5. Improved pedestrian routes and pedestrian safety, particularly over the narrow railway bridges leading into Radlett.

h) There is no direct, dedicated upgraded access for pedestrians and cyclists to Radlett Station proposed.

i) Opportunities for local employment for new residents would be few; Hertsmere's main employment areas are Borehamwood, Bushey & Potters Bar.

j) While land is shown to be set-aside for a Medical Centre, there is no guarantee that it will materialise, let alone have funding. In any event, the proposed location is outside main area of local population to be served. With all the additional road trips that would be generated, the location would be considered unsustainable. As the provision of a Medical Centre is not guaranteed and as per the Radlett Neighbourhood Plan RV2, it states that 'The retention or enhancement of the range of medical services in Radlett will be supported. Any such use should be located in the Village Centre unless it can be stated there are no viable and deliverable sites.'

k) The type of affordable housing is not indicated. We are all aware that in an expensive area such as Radlett the type of affordable housing proposed is key, as the housing costs for incoming families may be unaffordable.

l) Poor solar orientation. This negative aspect is particularly evident in autumn/winter mornings as the early sun casts a long shadow across the site until well after 0900. For the site to be sustainable, it is at these times of year, when air and ground temperatures are low that this solar benefit would be absent. Compounding these negative effects is the steeply rising wooded land east of the site, which has a protected mixed border of selected trees. To the east, the land rises to 126 metres at Wood Hall, about 1km distant. This hill prevents sunlight from reaching the ground until late morning in some parts of the site, which would make this location for dwellings

particularly damp, shady and therefore unsustainable and unsuitable.

m) The public consultation was disingenuous and inadequate. It was held virtually without a public meeting/exhibition and during the peak holiday season (5th - 31st August 2022) when many people would have been on holiday. Over half of the Radlett population were excluded from the consultation process as the statement of public consultation shows that the letters sent out did not go to those on the south side of Radlett in the area from Watling Street covering Watford Road, Loom Lane, Battlers Farm, Newlands Avenue etc. All of the boundaries in Radlett which are included in the Radlett Neighbourhood Plan should have been consulted.

n) The APC medical facilities working party, in partnership with the Red House Surgery practice group, has stated that unless there is a big rise in local population, their current setup is enough to service the community for the next 5-10 years.

o) We would like to be notified as to when the Committee hearing will take place.

5.k 24/0763/FUL - 45 Watford Road, Radlett – Proposal: Change of use of existing outbuilding in rear garden of dwelling to facilitate dog grooming business

Minutes:

No objection pending approval by Highways regarding rise in vehicular movements in and out of the property

5.l 23/1508/OUT - Land Rear Of Electricity Station, Hilfield Lane, Aldenham – Proposal: Application for a Battery Energy Storage System (BESS) and associated landscaping and access. Outline Application to include Access. (Appearance, Landscape, Layout & Scale are Reserved). (Amended Plans Received 29/08/2024)

Minutes:

Object --

Aldenham Parish Council (APC) strongly objects to the proposal 23/1508/OUT being an application for a Battery Energy Storage System (BESS) and associated landscaping and access at Land Rear of Electricity Station Hilfield Lane Aldenham Hertfordshire and urges the Council to reject the application for the following reasons.

APC resubmits its previous objections, as we firmly believe all the original points are valid.

1. METROPOLITAN GREEN BELT

This proposal is for a BESS on Metropolitan Green Belt land and as such there is a presumption against inappropriate development which is harmful unless very special circumstances can be demonstrated.

The proposal does not meet the threshold of very special circumstances that would allow the development to take place. NPPF 2019 (Para 148) broadly acknowledges the importance of supporting renewable energy but states (Para 147) that even so within the Metropolitan Green Belt, elements of many renewable energy projects will comprise inappropriate but this is not a renewable energy project and will simply store whatever electricity is flowing through the grid.

Whilst a certain amount of stored electricity may be required for balancing reasons this proposal is on a scale vastly exceeding any such requirement and in any event the applicant has produced no evidence that any storage is needed by National Grid.

The National Grid is a nationwide network and so any need for stored electricity can be at any location that has a sufficient size grid connection. As there are well over 100 other National Grid substations around the UK a thorough site selection process could indicate a brownfield site that could be used for this development.

Siting the development on brownfield land would be far more appropriate and preserve the setting and special character of this area and its rural low-density character under Green Belt designation policy.

There are 3 conservation areas in very close proximity and the development would spoil the long views and open aspect in respect of each of them.

The Council and the Planning Inspectorate have already considered and rejected a BESS for a fraction of this size and for half the length of time proposed here under 18 /1587/OUT on Green Belt even though part of that land had previously been developed on the basis that was 'not a low carbon energy source and confirming that and that these systems should be located alongside a renewable energy facility.[t would therefore fail to accord with SADM policies 22 and 26, Core Strategy 2013 polices SP1, SP2 and CS13 and the advice contained within the NPPF 2019.']

This huge size is not needed in this location brings no benefit to our community and being so near to houses schools, Elstree Aerodrome and Bhaktivedanta Manor brings an unacceptable

environmental hazard both in terms of noise levels and unwarranted risk in the event of fire.

2. LANDSCAPE AND VISUAL IMPACT

The Hertsmere Local Plan requires that development should be located as unobtrusively as possible, isolated buildings should be avoided, and should not be harmful to the openness of the Green Belt. (SADM 27). This development will result in a very large industrialised development. This encroachment will intrude on the openness of the Green Belt and spoil the character and appearance of the area.

Visually the undeveloped nature of the site will be spoiled and the BESS will result in unacceptable harm to the openness of the landscape, character and visual amenity of the surrounding area (SADM 27). We have serious concerns regarding the proposed screening which will take many years to mature, may heighten risk of fire spread and will be insufficient to hide the development from a number of heavily used nearby footpaths which are used daily for recreational purposes. The industrialised bulk of the development will also result in unacceptable spatial impact on the land.

The Landscape and Visual Impact Statement (LVIA) is an inadequate assessment of these issues ignoring as it does any private view; for example, there are clear views over the site from parts of Aldenham School and from Bhaktivedanta Manor adjoining.

3. NOISE

Paragraph 174 of the NPPF states planning policies and decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of noise pollution.

We find the applicant's Noise Impact assessment highly troubling, providing that additional background noise levels will be +5dB whereas Hertsmere's 2016 ' Site Allocations and Development Management Policies Plan, Clause 4.68, requires that any new development noise generated should be -10dB below the existing background noise level. This is completely unacceptable and contrary to NPPF para 185 which states decisions should ensure that new development reduces to a minimum potential adverse impact resulting from noise from new development; avoid noise giving rise to significant adverse impacts on health and the quality of life and identify and protect tranquil areas which have remained relatively

undisturbed by noise and are prized for their recreational and amenity value for this reason. The Noise Policy Statement for England DEFRA 2010 (NPSE) -footnoted in para 185- means that noise must be considered at the appropriate time and the baseline noise survey with no reference to equipment being used is insufficient.

A BESS has different core noise sources from its air conditioning units, transformers, inverters and substations and there will be constant noise at different frequencies all day and night including tonal buzzing resulting in unacceptable noise pollution which impacts mental health and disrupts sleep.

Further urgent investigation into noise must be undertaken prior to the application being decided. Proper consideration must be given to nearby sensitive sites, ambient noise levels need to be confirmed by Council investigation and noise levels considered above ground floor level as noise impact increases with height. We strongly disagree with the Consultee comment from Environmental Health that this is a matter that can be conditioned. They have said 'There is a concern that there will be tonal noise produced by the proposed installation, which even a long distance would be audible and annoying whilst occurring 24/7 and this needs to be investigated now.

4. FIRE RISK

There has been much recent publicity regarding fire from lithium ion batteries ranging from bicycles to EVs and also BESS systems. UK understanding and proper practice is at a very early stage and this technology is advancing far more quickly than adequate regulation ' this is very well explained in a Government report published on 26 November 2023

<https://www.gov.uk/government/publications/uk-battery-strategy>

Risk of a BESS fire simply cannot be eliminated. Practice is that these fires are left to burn out with consequential water and airborne pollution. This underlines the unsuitability of the site bearing in mind the nearby community.

Educational, religious and residential sites are 500 m from what would be the biggest development of this type in Europe.

In investigating the impact, a cavalier attitude seems to have been adopted; insufficient water supplies are proposed. The Meteorological report makes little of the risk. Statistically the bigger the BESS the greater the fire risk. The recent Fire Service guidance requiring at least 2 access roads, possibly more, has been disregarded and whilst cursory consultation

may have been undertaken with the FRS no meaningful conclusion can be made without knowing the specific equipment being proposed. Government guidance provides for the Council to also liaise at an early stage with the FRS but this does not appear to have taken place save for an enquiry of the hydrants department. There is an urgent need to assess required access roads, water supply and the possibility of the screening proposals increasing fire risk.

5. WATER AND WILDLIFE

Protection of our drinking water supply is paramount. Although the developer refers to a borehole and filtration system for run-off water. APC has grave concerns this will not prevent toxic water seeping into our system. We query how any filtration system can adequately cleanse highly toxic water and seepage from the boreholes down into the aquifers serving this area will be inevitable, the more so as we feel the developer has paid little regard to the amount of water that could be required if there was a fire, fire contagion, increased fire risk from newly introduced vegetation and solar panels should that separate application proceed. It is all well and good to suggest a cumulative impact assessment of the effect of the solar plant will be made if that proceeds but that it still at appeal and a second application has been lodged which itself could go to appeal. No cumulative assessment will mitigate a situation if the BESS has been built out with the proposed borehole and filtration system, the solar plant receives consent sometime after that and a fire spreads to the panels requiring far more water than is currently planned for. This would also impact future mineral extraction as the site lies in a Mineral Consultation Area. SADM 18.

Also, a Source Protection Zone lies to the south of the site and a water well, used for private supply, lies 130m to the north. This is used as a private water supply.

The substantial amount of water required for cooling could exacerbate flooding as there are areas of high risk immediately to the northern border of the site and the residents of the area are only too familiar with the constant road flooding that occurs after heavy rain which also spreads to nearby fields.

The Council must also take account of the Wildlife Site adjoining the site to the west and the nearby important Wildlife Site at Hilfield Park Reservoir. These are material considerations in considering the application.

The noise impacts we have already mentioned will also affect

Bhaktivedanta' dairy herd.

6. LOSS OF AGRICULTURAL LAND

The site has long been used for agricultural production; over one quarter is grade 3a, the rest 3b. Loss of this represents a threat to food security and the fact that the 3a area will be devoted to screening does not mitigate this.

7. HERITAGE AND SETTING

The site adjoins the Grade II Bhaktivedanta Manor which has long clear views across the site through very wide fencing with little tree coverage and the BESS will cause substantial harm to its setting of the Manor contrary to the Hertsmere Local Plan and Core Strategy which states that any new development should not detract from the setting of the Listed Building.

The development will also impact the setting of the 3 Conservation Areas of Letchmore Heath, Patchetts Green and Roundbush which will all have some views over the site despite the screening. These areas all have a number of Listed and locally listed buildings and the nearest village, Letchmore Heath has article 4 directions which emphasise the importance of preserving its appearance.

There are also various views over the site from different parts of Aldenham School, some at upper level, and very long clear views from the chapel.

APC has not been able to access Hilfield Castle, Grade II which is privately owned but being on a very steep elevation the effect on its setting requires detailed consideration.

8. SITE SELECTION AND SIZE AND SCALE

When considering the suitability of this site two strands need to be addressed.

Whether or not any other site is available is this site suitable for a BESS uniquely large in Europe? We strongly believe it is not due to the noise, fire and other issues we mention. At 1.5gw the site is 50 % of the combination of all other UK sites - approximately 130. It is not so much a BESS as a giga BESS and special considerations as to siting ' far from residential communities, on brownfield land and by a natural water supply should apply.

In view of the size the Alternative Site Assessment is far too narrow and this proposal requires a nationwide search. If a truly suitable site cannot be found then the conclusion may well be that this proposal is just too large.

The size and scale of the proposed BESS is completely unsuited to be located on Green Belt near the village's schools, place of worship and aerodrome ' the average size of new BESS is 38 MW' this is 1500 MW.

9. PERMANANCY

The scheme is for 40 years with construction and decommissioning time in addition. This is tantamount to being permanent.

10. SPECIFIC AFFECTED USES

The site has a common boundary with Bhaktivedanta Manor and the Council's SPD Planning Brief (December 2012) recognises it as a site of special religious and national significance. The wide-ranging activities there, religious, spiritual and meditative in nature will be very seriously troubled by noise. The property has many residents and sleeping will be disturbed. It is completely inappropriate to build an industrial plant next to this and their views will also be impacted.

Furthermore, the proposed access road is dangerously near the private much used road Dharam Marg lying literally a couple of metres away from the access road where they both join Hilfield Lane. Bhaktivedanta Manor has hundreds of thousands of visitors yearly with tens of thousands on festival days and any emergency evacuation required would be very compromised by the close proximity of the roads.

There is a very large school/ student body in the immediate vicinity of the site. Aldenham School, around 500 m away has 850 pupils and 200 staff. Around 20% of pupils board and there are nearly 100 staff who live on site, some with families. The nearby HABS school population is around 2700.

There are other schools too including a nursery at Bhaktivedanta Manor and the Delrow School -all students will be affected by noise, its effect on learning and exposed to fire risk. Evacuation, if necessary, of so many young people would be completely chaotic as these schools are reached through a number of narrow lanes.

The applicant seems to have completely ignored the Elstree Aerodrome a few hundred metres away saying that there is no reason to consider that the development will have any adverse impact upon the Aerodrome. It is an alarming view ' the Aerodrome has not been consulted and no regard has been given to the Civil Aviation Authority Guidance Note of July 2023 which stipulates multiple assessments that the developer and

aerodrome operator need to undertake. A major concern is that this site encroaches into the recommended safety cone around the runway and that the development removes an emergency landing area which will be compounded if the solar plant proceeds.

Whilst the site is not within Radlett Neighbourhood Plan area, it will have effects on certain of the objectives outlined in the plan which has been adopted by Hertsmere Borough Council.

Objective 4 (RNP) - To promote the protection and positive use of the surrounding Green Belt by providing more opportunity to access it by foot, horseback and bicycle.

If this application were to be approved, many acres of Green Belt land would be lost and Objective 4 could not be fulfilled.

POLICY GA - Getting Around Infrastructure

GA1 - Walking and cycling networks - (Second paragraph) - Development that reduces the quantity, functionality and/or quality of walking and cycle networks would not be supported.

11. CUMULATIVE EFFECTS

Although the applicant states it will carry out a cumulation study if the solar plant proceeds the final outcome of that may not be known for a couple of years. The current appeal decision has just been deferred till February 2024, then there is the second application and a possible appeal from that. Until it is known if that will be built a BESS cannot proceed as there could be very serious impacts ' increased fire risk, removal of too much land for emergency landings and cumulative visual impact.

We are aware of a second substation intended on National Grid Land- that is irrefutable (Elstree B) and the development and substation should be assessed together now for cumulative effects.

12. ROADWAYS AND ACCESS

As we have said the roadway proposed into the BESS off of Hilfield Lane is wholly insufficient being too near Dharam Marg but also note that these 2 roads are under 20 m from Sandy Lane so that there will be 3 T junctions along a short stretch. We emphasise again that 1 road only into the site is insufficient for firefighters due to change of wind direction and contravenes NFCC guidelines.

The nature of Dharam Marg must be understood. This is not a public highway and has gated intercom access which can lead to traffic backing up on Hilfield Lane.

13. CONSTRUCTION MANAGEMENT PLAN

As we understand the applicant has not visited Bhaktivedanta Manor we have serious doubts that the plan adequately addresses the unique issues that arise from the constant stream of visitors there and the inappropriateness of the site's access right next to Dharam Marg.

14. CONSULTATION

The previous consultation was carried out in peak school holiday time, insufficient residents were involved, no consultation was carried out with the Aerodrome and no site visit has been made to Bhaktivedanta Manor. Many responses on the applicant's admission were disregarded and so the report cannot reflect the feeling of those who will be affected by the development.

This industrial proposal carries significant risks, is far too large for this area and there are not very special circumstances justifying building on Green Belt land. APC asks the Council to reject this application also.

In summary, our objection to the new proposal are:

- The proposed woodland is deciduous and will be ineffective in winter, and the trees being planted will take a long time to mature;
- so much dense planting at the same time risks high rate of failure;
- the sheer mass of the planting will be an intrusion into the openness of the Green Belt;
- owing to there being constraints on planting near overhead power lines and the height of the substations the site will never be totally screened;
- the proposed tree planting is very near to the containers, thereby increasing fire risk. This is contrary to guidance issued by Government and draft new guidance from the NFCC, both issued after the original application, but before the amendments went in - the applicant has made no adjustments;
- the enhanced battery density brings increased fire risk and noise from cooling equipment;
- the applicant's proposal to keep noise to an acceptable level is not backed up by any new evidence, and is unachievable according to the noise report they supplied, and also an independent noise report commissioned by Bhaktivedanta Manor.

5.m 24/1128/FUL - Children's Play Area, Phillimore Recreation Ground, Gills Hollow, Radlett – Proposal: Proposed pathway from the entrance gate to Children's Play Area at Phillimore Recreation Ground and between existing play equipment at the northern end of the site

5.n 24/1146/VOC - 14 Letchmore Road, Radlett – Proposal: Application for variation of condition 2 (plans) to allow for reconfiguration of front elevation including alterations to front gables and porch, and alterations to fenestration and rooflights following grant of planning permission application reference 20/0443/FUL

Minutes:

Object --

a) This proposal is in breach of SADM 30 in terms of high-quality design and recognising and complementing the particular local character of the area in which it is located. The fenestration and the windows should match the existing designs on the road.

b) The parking for 4 vehicles to the front of the property would lose the verdant frontage and be contrary to the Radlett Neighbourhood Plan Design Code D - Front Gardens.

6 For information: Planning Applications of the following type: - Certificate of Lawful Development (Existing) CLE, Certificate of Lawful Development (Proposed) CLP and Listed Building Consent LBC.

Minutes:

This was noted.

6.a 24/1175/CLE - 3 - 4 Wall Hall Farm Cottages, Pelham Lane, Aldenham – Proposal: Retrospective planning permission for single storey side extension, single storey rear extension, alterations to rear extension roof and alterations to main dwelling roof to include insertion of rooflights and alterations to fenestration in order to regularise the development as built, following grant of planning permission 16/2467/FUL Certificate of Lawful Development (Existing)

7 Planning decisions by Hertsmere Borough Council

Minutes:

These were noted.

- 7.a 23/0276/VOC - 12 Watford Road, Radlett – HBC decision was Refuse Permission – APC comment was No Objection**
- 7.b 24/0652/FUL - Red Lion Hotel, 78 - 80 Watling Street, Radlett – HBC decision was Grant Permission – APC comment was No Objection**
- 7.c 24/0824/VOC - 7 Hawthorne Road, Radlett – HBC decision was Grant Permission – APC comment was No Objection**
- 7.d 24/0589/VOC - The Bothy 1, Kendal Hall, Watling Street, Radlett – HBC decision was Grant Permission – APC comment was No Objection**
- 7.e 24/0852/HSE - 1 Church Farm Cottages, Church Lane, Aldenham – HBC decision was Grant Permission – APC comment was No Objection**
- 7.f 24/0845/HSE - 9 Aldenham Avenue, Radlett – HBC decision was Grant Permission – APC comment was No Objection**
- 7.g 24/1002/VOC - The White House, Waterside, Radlett – Application was withdrawn**
- 7.h 24/1005/HSE - 8 The Drive, Radlett – HBC decision was Grant Permission – APC comment was Object**
- 7.i 24/0901/FUL - Lychgate , The Warren, Radlett – HBC decision was Grant Permission – APC comment was Object**

8 Date of next meeting Monday 21st October 2024

Minutes:

There being no further business the meeting finished at 9.20pm.

Chairman.....Date.....