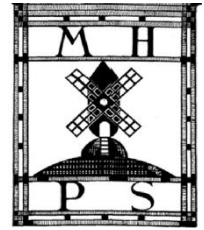


Mill Hill Preservation Society founded 1949

Patron: Lady Hobson OBE JP
President: Dr Michael Worms BSc PhD
Vice Chairmen: Kevin Green
Hon. Architect: John Living AAdip CMDip RIBA
Hon. Solicitor: Robert Cottingham MA
Hon. Treasurer: Wendy Living BA ACA JP
Administrator & Membership Secretary: Kim Thompson



...making change worthwhile

For the attention of Josh McLean

London Borough of Barnet
Planning and Building Control
2 Bristol Avenue, Colindale
London NW9 4EW

4th November 2021

Your reference: 20/4241/FUL

Our Reference MHPS / JL / planning group / 20/4241/FUL amended application

Sent only by email to Josh McLean (josh.mclean@barnet.gov.uk)

Dear Josh Mclean,

TOWN AND COUNTRY PLANNING ACT 1990

SITE: Land Adjacent to The National Grid Sub-station Partingdale Lane London NW7 1NS

PROPOSAL: Installation of a battery storage facility including inverter and transformer stations, battery storage containers, other associated infrastructure works, security fencing and lighting

REF: 20/4241/FUL

We wrote objecting to this proposal on 22nd October 2020 and for ease of reference we shall include a further copy of that letter with this submission. The Society stands by its original letter of objection as we feel the additional information has not changed the principle of the scheme. As the Gas Peaking Plant application has been withdrawn there is more optional space available to relocate the BESS without spoiling a Green Belt paddock. This image shows the location of the intended installation.



Photograph 12: Western field.

ECOLOGY: We have examined the additional information on the LBB planning portal and our letter is drafted accordingly. It would appear that the Applicant is trying to respond to the comments made

previously on ecology, in particular seeking to address net biodiversity gain, as required by paragraph 180.d) of the National Planning Policy Framework (NPPF) 2021.

Interestingly enough the Applicant has opted to use the Natural England Biodiversity Metric 2.0 that was replaced with the 3.0 Metric in July 2021. Achieving net gain using the 2.0 metric on sites such as this is perceived as easier due to added flexibility within the metric when considering the base conditions that simply isn't available in 3.0. Whilst all our other comments remain relevant, as the scheme hasn't changed, it is worth highlighting that the most up to date metric has not been used and that the work was obviously undertaken after the 2.0 metric was superseded. There is no excuse for this error and no confidence should therefore be gained from this submitted information. The applicant should be requested to provide accurate information using the 3.0 metric.

NOISE: It is required that measures proposed for noise reduction meet Barnet's Environmental Health Guidance limit. As the plant has not been selected yet this matter is unclear. Moreover, given the existing constant humming from the sub-station experienced by Hillview Road residents, the BESS noise will be cumulative. The Avian Ecology report indeed admits that night-time noise in Hillview Road may have an adverse impact on residents. It is particularly concerning that the response to the comments on noise from the Environmental Protection Officer states that any noise mitigation measures will only be submitted "just prior to construction of the development". This would give the applicant *carte blanche* to design measures over which there is no further control if they are ineffective. This is unacceptable to the Society.

Conclusions

MHPS feels it has argued a good case against this application. We can see no justification as to why this is thought a suitable location for the 'Mill Hill Battery Energy Storage System' (BESS) facility including inverter and transformer stations, given that sort of facility would be best associated with an actual renewable energy installation, preferably on a brownfield site.

We believe that the applicant should use Natural England Biodiversity Metric 3.0 (July 2021) to evaluate the ecological impact.

Residents living close to the proposed facility may be affected by noise pollution in particular; the nearest Hillview Road dwellings being just 120m distant (Clause 2.2 Environmental Noise Impact Assessment), not 350m as claimed in the planning document (Clause 2.1.4 Planning Statement), and it is imperative that the measures proposed for noise reduction meet Barnet's Environmental Health Guidance limits. As the plant has not been selected yet this matter is as yet undetermined. The risk of noise issues strongly suggests that the BESS should be located as far as possible from residential areas.

Without adequate evidence we conclude that this facility will be responsible for damage to ecology, will increase flood risk and hamper surface water drainage and, with light and noise pollution, will be detrimental to the Green Belt and its accessibility to local residents.

We implore officers to refuse the application.

Yours Sincerely

John Living

On behalf of Mill Hill Preservation Society planning group

JL / jl / MHPS / planning group 20/4241/FUL amended application