

Shaun Greaves
Planning Officer
Development Management
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Hertfordshire LEADS
Hertfordshire County Council
County Hall
Pegs Lane
Hertford
Herts SG13 8DF

www.hertfordshire.gov.uk

Contact: Bernie Fleming
Tel: 01992 555220
Email: ecology@hertfordshire.gov.uk
Date: 15 September 2023

Dear Shaun,

Planning application reference: 21/03380/FP

Planning Inspectorate Reference: APP/X1925/N/23/3323321

Proposed solar farm measuring 88 hectares with associated battery storage containers, transformers stations, storage buildings, fencing etc including means of access

Land to the North and East of Great Wymondley

ECOLOGICAL IMPLICATIONS

Overall Recommendation:

- The application can be determined with no ecological objections (subject to the addition of the recommended conditions to any consent).

Summary of Advice:

- There has been no material change in our advice from that set out in previous letter of 6 May 2022 which is;
- The predicted biodiversity net gain is ambitious but, in principle, can be achieved;
- To deliver the net gain predicted, a condition is required to secure the production and implementation of a Biodiversity Net Gain Management Plan;
- To avoid harm to the 'Wymondley Transforming Station' Local Wildlife Site from the construction of the 'cable route', a condition is required to ensure the production and implementation of a Soil Management Plan;

- To secure the maintenance of hare and breeding bird populations, a condition was recommended to ensure the production and implementation of a suitable monitoring strategy; and
- Should these measures be adopted, no conflicts with national or local planning policy or law are anticipated.

Supporting documents:

I have made use of the following documents in providing this advice:

- North Hertfordshire Local Plan 2011-2031
- North Hertfordshire Developer Contributions Supplementary Planning Document (January 2023)
- Priory Farm Solar Array Biodiversity Metric 4.0, AGR 4 Solar Limited, 27 June 2023
- Priory Farm Solar Array Ecological Assessment Report, Avian Ecology, 13 December 2021.

Comments:

Thank you for consulting Hertfordshire LEADS on the revised biodiversity metric associated with this application.

We first commented on this proposed development by letter of 6 May 2022. Our views expressed then are summarised below:

- The site supports only modest levels of ecological interest;
- Accordingly, we had no objection to the principle of this type of development on this site;
- The biodiversity metric provided (v3.0) set ambitious targets;
- To secure its delivery, a Biodiversity Net Gain Management Plan (BNGMP) was recommended, to be secured by condition;
- To secure the maintenance of hare and bird populations, a condition was recommended to ensure the production and implementation of a suitable monitoring strategy with suitable measures to be accommodated within the BNGMP; and
- To avoid harm to the 'Wymondley Transforming Station' Local Wildlife Site (LWS) from the construction of the 'cable route', a condition was recommended to ensure the production and implementation of a Soil Management Plan.

Since our previous letter, we have recently been provided with an updated v4.0 biodiversity metric and note the submission of the statement of case and relevant evidence. In addition, we now note that the North Herts Local Plan has been adopted in late 2022 and the North Herts Developer Contributions Supplementary Planning Document (SPD) in January 2023. Whilst the plan encourages the delivery of a biodiversity net gain no fixed percentage is required. However, the SPD goes further and encourages the delivery of a minimum 10%.

The evidence is now considered again in the context of these new circumstances.

The revised metric follows best practice and a contemporary metric has been utilised. A net gain of c206% in habitat units and c102% in hedgerow units are predicted and the trading rules are satisfied.

Whilst these outcomes are anticipated by, in particular, the same establishment of 'other neutral grassland' in 'moderate' or 'good' condition as proposed before, a further modest increase in the predicted net gain is indicated. This appears to be because the surrounding buffer has been expanded to 12m width to accommodate other local plan policies so allowing further habitat creation that is less constrained than that proposed associated with the solar panel arrays.

The 206% BNG now claimed is delivered, primarily, by the hedgerow buffers which appear to support the establishment and maintenance of the higher value grasslands proposed ('Other Neutral Grassland' (ONG) in 'good' condition). Similarly, it appears the land associated with the solar panel arrays is intended to support a lower value grassland (ONG in 'moderate' condition), reflecting the greater constraints imposed.

Whilst we are satisfied both grassland communities can be created at the outset, and, in the case of the hedgerow buffer be maintained by grazing throughout the 30-year period, only limited information is provided on how the grassland associated with the panel arrays will be managed and the value maintained for the same period of time.

Shading is clearly an issue which must be considered (BRE (2014) Biodiversity Guidance for Solar Developments. Eds G E Parker and L Greene.), as one of the case studies cited (Wiltshire Wildlife Trust developing Chelworth solar farm) demonstrates. This is further complicated if the proposed grassland management by light grazing is not maintained, given mechanical cutting and removal of vegetation beneath the panels would be more difficult if not impossible to achieve.

Ultimately, only long-term monitoring would demonstrate how the grasslands are progressing throughout the site and whether the BNG claimed is being achieved. This may require further enhancements or changes in management if not. However, we remain satisfied that a BNG well in excess of the Government's proposed minimum requirement of 10% would be delivered and that impacts on biodiversity do not represent a fundamental constraint on the proposed development.

As in our previous letter though, to secure the delivery of the net gain predicted, a condition is required to secure the production and implementation of a BNGMP where the precise objectives, management regimes and remedial measures can be set out.

No other changes in circumstances have arisen that could potentially affect our previous advice on other ecological matters, i.e., the production of a soil management plan to safeguard the LWs and a monitoring strategy for hares and bird populations.

Therefore, our advice is, essentially, unchanged.

Conclusion

There has been no material change in our advice.

Should the recommended conditions be attached to any consent, no conflicts with national or local planning policy or law are anticipated.

I trust these comments are of assistance,

Yours sincerely,

Bernie Fleming

Ecology Advisor

Hertfordshire LEADS

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.