
Priory Farm Solar Array

PINS Ref: APP/X1925/V/23/3323321. LPA Ref: 21/03380/FP

Summary Proof of Evidence: Ecology

By Howard Fearn, on behalf of the Applicant: AGR 4 Solar Ltd.



1.0 SUMMARY PROOF OF EVIDENCE: ECOLOGY

- 1.1 My name is Howard Fearn. I am the Director of Avian Ecology Ltd. (“AEL”), an ecological consultancy which currently employs twenty professional ecologists. I have been a practicing professional ecologist for twenty-one years.
- 1.2 I have a Master’s degree in Ecology and Environmental Management, and I am a full member of the Chartered Institute of Environmental Management (“CIEEM”). My project experience is primarily in renewable energy developments, in particular onshore wind and solar energy projects of all scales across the UK.
- 1.3 An AEL colleague produced the Ecological Assessment Report (“EAR”) which accompanied the original planning application (ref 21/03380/FP) in December 2021. I have subsequently become involved following the decision by the Secretary of State (“SoS”) to call-in the planning application for determination. I am familiar with the Appeal Site and the immediate surrounding area, having made a site visit on 30th June 2023.
- 1.4 As I have outlined in my Proof of Evidence, Hertfordshire Ecology (acting on behalf of NHDC), has no objection to the Proposed Development, subject to conditions. There has been no objection to the Application from Natural England, nor from the Herts and Middlesex Wildlife Trust (the latter following re-consultation on provision of an amended landscaping scheme).
- 1.5 In my Proof, I set-out the ecological context of the Appeal Site, identifying it as primarily arable farmland typical of the region, with fields bounded by hedgerows and occasional pockets of woodland.
- 1.6 My Proof of Evidence then goes on to consider the ecological impact assessment (‘the EAR’) submitted with the Application, noting that this accords with ‘BS42020 Biodiversity- Code of Practice for Planning and Development’.
- 1.7 The EAR presents a comprehensive ‘baseline’ of ecological receptors on Site, and off-site where these may be affected by the Proposed Development, and includes details of habitat survey, breeding bird surveys and eDNA surveys for great crested newts in off-site ponds. The EAR then goes on to describe how effects of the Proposed Development have been minimised by avoiding the removal of boundary (hedgerow) features and trees, and that effects on habitats, protected and notable species can be avoided through standard good practice construction measures.

- 1.8 The main elements of the Proposed Development do not form part of any statutory or non-statutory designated site for nature conservation; however, the cable route connection to the corresponding substation does cross through a non-statutory site; the Wymondley Transforming Local Wildlife Site (“LWS”). Effects on the LWS are minimal, needing only a temporary cable lay, and will be reinstated on completion.
- 1.9 The Proposed Development includes beneficial habitat enhancements and a commitment to their on-going management. Measures proposed, and detailed within the Planning Drawing (3004-01-012 Rev F Landscape Proposals (CD24)) comprise the conversion of arable land to pasture, the creation of wildflower meadow and planting of native species hedgerows and woodland. Such measures will provide considerable opportunity for a large number of dependent species and are therefore a benefit of the scheme.
- 1.10 As detailed in my Proof of Evidence, the EAR included a Biodiversity Net Gain (“BNG”) assessment, using the Defra Biodiversity Metric version 3.0, as applicable at the time of submission. The BNG assessment considered the pre-development (baseline) habitats and post development habitats following the implementation of the landscape scheme (CD24). The BNG assessment concluded a substantial percentage gain of 202.64% habitat units and 90.96% linear units. For the purposes of this Appeal, the BNG calculation has been re-run using the most recent Defra Metric (version 4.0) and the results are almost entirely unchanged.
- 1.11 My Proof of Evidence then discusses responses to the application from Northamptonshire District Council (NHDC) in both the Committee Report and their Statement of Case (SoC). The Committee concluded that, subject to the recommended conditions, the Proposed Development would not result in harm to biodiversity and that, on balance, there would be net gains which weigh in favour of the proposal. The NHDC SoC states that Local Plan Policy NE4 requires net gains in biodiversity (BNG), and notes that the Proposed Development exceeds the Local Plan policy requirement and the emerging national target of 10% BNG. Therefore, the Proposal complies with LP Policy NE4 and paragraph 180 of the NPPF.
- 1.12 My Proof then addresses matters raised by third parties, as received at the time of writing. My Proof provides responses directly to points raised, and summarises that it is my opinion that all matters raised by third parties have been adequately addressed, citing a recently published paper ‘Solar Habitats: Ecological Trends on Solar Farms in the UK’.
- 1.13 My Proof then considers compliance with relevant local and national planning policies, in particular the Hertfordshire District Local Plan 2011-2031 (NHDLP, CD 39) and the National

Planning Policy Framework (NPPF, CD56). It is my expressed view that the Application accords fully with the relevant sections of both local and national policy.

- 1.14 Subsequently and in conclusion, on review of the submitted application and noting the ecological benefits of the Proposed Development, I can see no reason why this application should not be approved as a result of matters relating to ecology.