

4th March 2025

North Herts Council
Liz Anderson- Ecologist / Paul Chaston- Planning Officer
By email.

Re: Alternative cable route

Planning Reference: 24/02333/FP

Location: Land between Priory Farm and Wymondley Substation, Blakemore End Road, Little Wymondley, Hertfordshire

Application Detail: Electrical connection between the approved Priory Solar Farm and Wymondley Substation

To Liz and Paul,

I am writing in relation to the planning consultee response on behalf of North Herts Council providing comments regarding the above planning application, dated the 29th November 2024. Following the consultee comments received, I also spoke with Liz on the phone to discuss the project further.

To inform the application, ecological reports were submitted, comprising an Ecological Assessment Report (EAR)¹, Water Vole and Otter Report² and Biodiversity Net Gain (BNG) Statutory Metric³ produced by Avian Ecology Ltd.

In response to the comments, the Site red line boundary has since been altered slightly. In addition to the previously submitted reports and for clarity, we have sought to directly address the red line boundary change and queries involving ecology below.

Red Line Boundary

Comment:

“Works to be carried out in this area include laying a new cable from the exiting substation across the LWS via open trench techniques (900mm wide and 1m deep)’ therefore it is not clear why the red line boundary is so extensive.”

Response:

The size of the red line boundary within the Wymondley Substation Local Wildlife Site has now been reduced. The amendment covers the area required for the cable route and facilitates working areas required to install the cable via Horizontal Directional Drilling (HDD) and the corresponding entry/exit pits. Please refer to Axis Darwing ref: 3656-01-003 General Arrangement_RevA to see the revised boundary plan and **Figures 1a-1c** within this document to see the amended habitat map.

As such, the total area of Site has been reduced from 2.5ha to 1.71ha.

It should also be noted that the entry/exit pits for HDD have been moved further apart in the western extent of Site. This ensures a larger expanse of habitat is protected on ground level, specifically for

¹ Priory Farm Solar Array Alternative Cable Route Ecological Assessment Report 2024, Avian Ecology Ltd.

² Appendix 2- Priory Farm Solar Array Alternative Cable Route Water Vole and Otter Report 2024, Avian Ecology Ltd.

³ Priory Farm Solar Array Statutory Biodiversity Metric 2024, Avian Ecology Ltd.

priority habitat lowland meadow which now has nearly half of the cable route across this habitat being drilled underground, as opposed to larger areas of open trench work.

Biodiversity Net Gain

Comment:

“Explanation is given in the metric that impacts are predicted to be temporary and that habitats will be able to reach baseline habitat type and condition within 2 years post development thereby meeting the BNG definition of temporary and hence considered exempt from mandatory BNG. However, Natural England have issued advice stating;

‘There is no interaction between the De Minimis exemption and Temporary Impacts. For a development to be exempt it would need to meet the requirements of the De Minimis exemption (below).

A Temporary Impact is considered an impact in the exemption regulations. Therefore, if a development does not meet the De Minimis requirements (below), it will be required to deliver 10% Biodiversity Net Gain (BNG). "Development below the threshold (De Minimis):-

A development that does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat OR
- 5 metres of on-site linear habitats such as hedgerows’

Given the extent of works proposed within the red line and the statement made in 4.4.9 of the EA ‘.. the cable route that crosses higher value habitats of open mosaic of habitats, lowland meadows and arable field margins, direct impacts cannot be completely avoided..’ the scheme would not be exempt and needs to demonstrate 10% Biodiversity Net Gain..”

Response:

It has been accepted that the project is not exempt from BNG, and is subject to requiring the minimum of 10% gain for habitat units. As the cable route red line boundary is small and has no scope to achieve 10% gain on-Site, an offsite mitigation area has instead been identified, an area within the consented Priory Farm Solar Array (planning ref: 21/03380/FP).

The offsite area measures 1ha within the wider solar array site, but not subject to any solar panels and fenced off from the remainder of site. In its current state it comprises arable cropland, however its consented habitat type under landscape plan (drawing ref: 3004-01-020 Doc12 Soft Landscape Proposals Rev B) is ‘Proposed grazing pasture: Cotswold Seeds Mix 20 ‘Herbal’ Grazing Ley mix’.

In terms of BNG and as detailed within the Landscape Ecology Management Plan⁴, this habitat was identified as other neutral grassland with a target condition of moderate. Please refer to **Figure 2** within this document to see the offsite consented future baseline habitat map.

This area of future baseline habitat will be enhanced from moderate condition to good condition in order to achieve net gain for this alternative cable route application. This will be achieved with appropriate management for a term of 30 years.

On-Site habitat units remain as the baseline of 10.27 but offsite habitat units will increase from 8.00 to 10.80, resulting in an overall net gain of 27.27% as shown in **Table 1**. Please refer to the updated Statutory Metric V2 for more details.

⁴ Priory Farm Solar Array LEMP_V2 2024, Avian Ecology Ltd.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	2.80
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	27.27%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Table 1: Updated Statutory BNG metric to reflect a change in the red line boundary and incorporating an offsite area to achieve net gain

Other matters

We welcome a CEMP and Soil Management Plan being conditioned.

I hope that the above satisfactorily addresses all points raised.

Yours sincerely,

Aimee Littlechild

Senior Ecologist

Avian Ecology Ltd

Figure 1a: Site Habitat Map

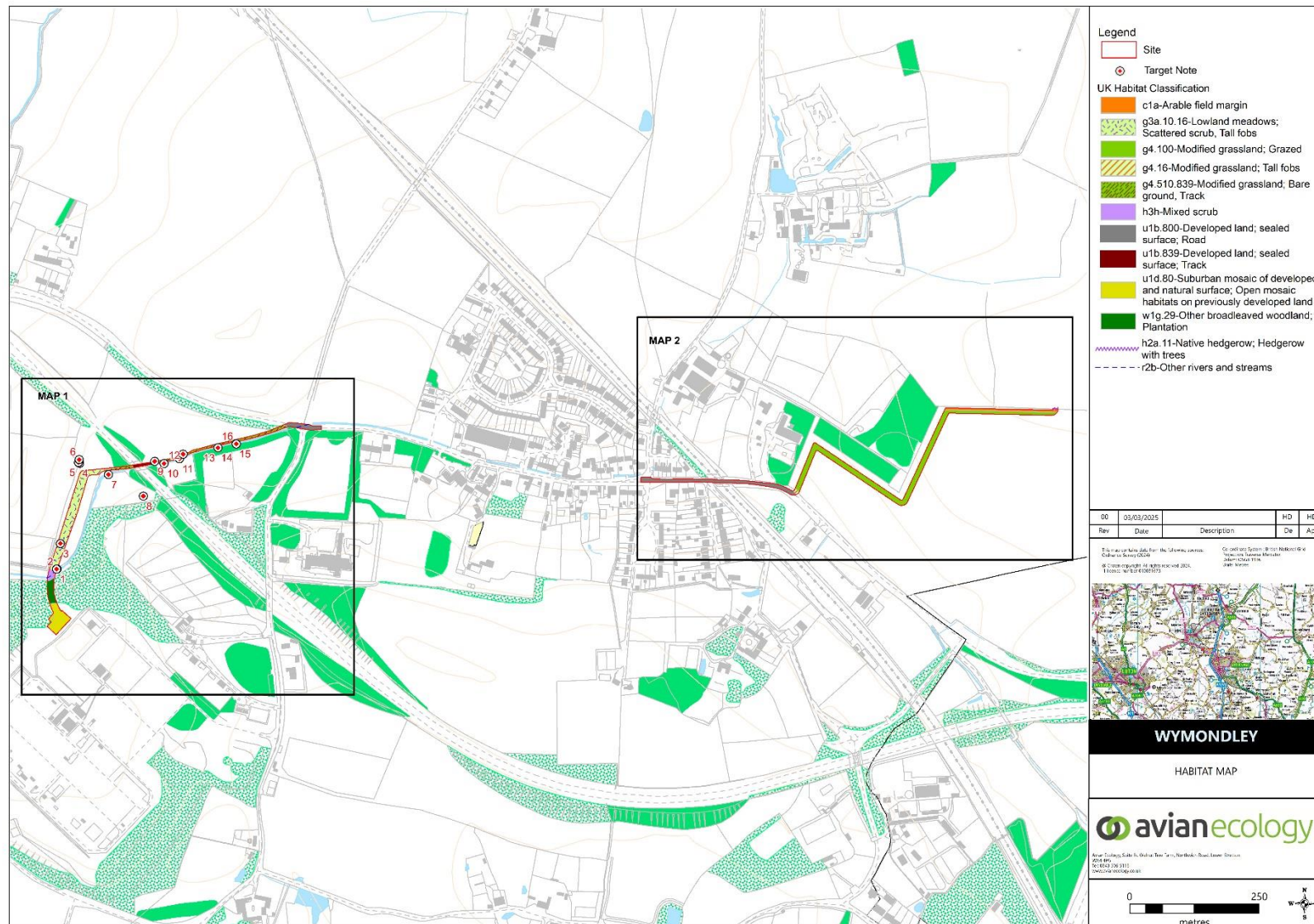


Figure 1b: Site Habitat Map

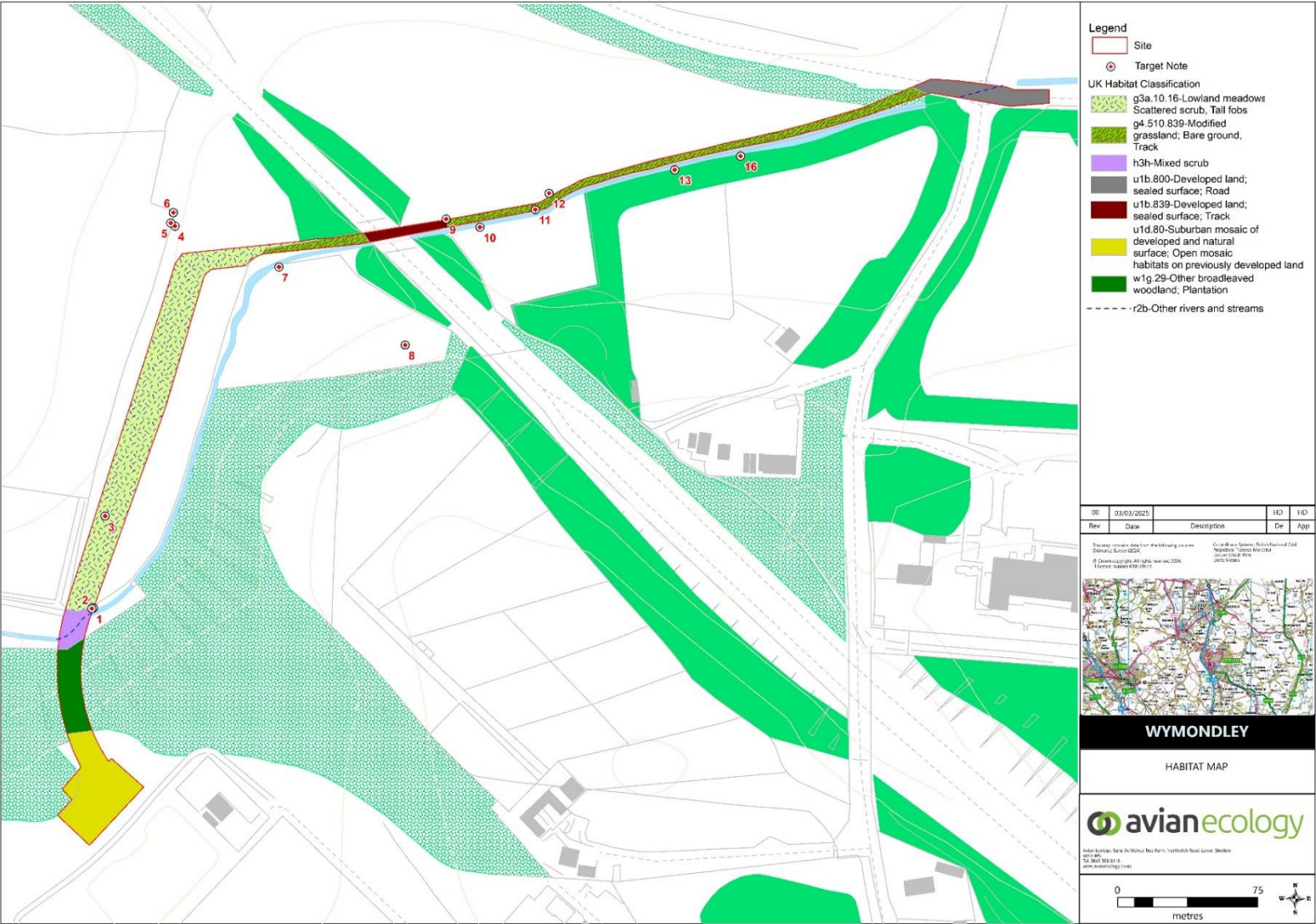


Figure 1c: Site Habitat Map

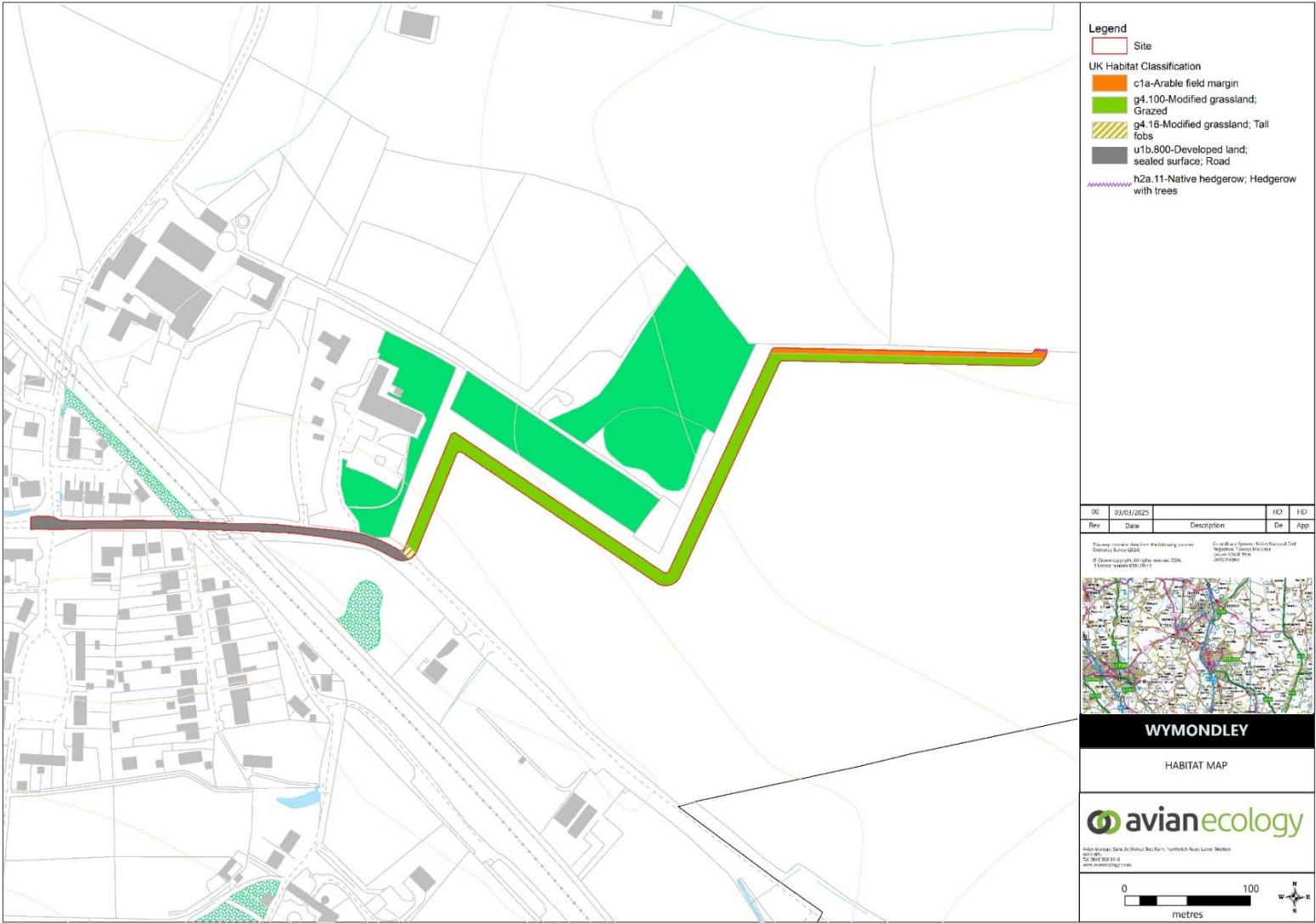


Figure 2: Offsite Consented Future Baseline Habitat Map

