

Client Name: Axis
Site Name: Sperberry Hill Solar and BESS Project, Resubmission
Project Ref: AxisL-043-1518
Date: 3rd February 2025

Response to NHDC Ecologist Comments

Introduction

This report has been prepared by Avian Ecology Ltd. (AEL) in relation to a planning application for a proposed solar farm with associated battery storage and ancillary infrastructure (hereafter the 'Resubmission Scheme') on land to the south of Wymondley substation and south of Sperberry Hill, St Ippolyts, North Hertfordshire (hereafter the 'Site'). This planning application is a resubmission of a previously refused solar development (planning ref: 22/00709/FP, hereafter the '2023 Scheme').

Comments on the Resubmission Scheme were received from the North Herts Council Ecologist (NHDC), dated 28th November 2024, requesting additional information on the matters summarised below:

- Specification of badger gates;
- Buffering of hedgerows; and
- Biodiversity Net Gain.

Each of these topics is addressed in turn.

Response to Comments

Badger Gate Specification

The planning design & access statement (PDAS) refers to the use of mammal gates in stock fencing around the site which is welcomed but the Indicative Deer-Stock Fencing plan, drawing 3732-01-11, shows these to be 200mmx200mm which appears slightly small for badger or foxes with commercial mammal gates available with openings measuring 225mm x 270mm seem better. In addition to this the inclusion of a 10cm gap at the base of boundary fences is suggested to allow continued permeability through the site for mammals. This may already be included but isn't identified on the plan.

Following the above comments, the badger gate specification has been amended to include gaps of 190mm x 270mm. These dimensions are in line with various specifications for badger gates issued by conservation bodies; for example, Forest Research technical guidance on forest fencing¹ and archive forestry commission advice² both specify dimensions of 190mm by 270mm.

In addition to the alteration in the badger gate specification, it is confirmed that a 100mm gap will be maintained at the bases of all fences to increase permeability for mammals.

¹ <https://cdn.forestresearch.gov.uk/2006/03/fctg002.pdf>

² https://cdn.forestresearch.gov.uk/1976/04/fclf068_1976.pdf

Given the enlarged badger gates and confirmation of 100m gap to allow passage of mammals, it is considered that the Resubmission Scheme will be permeable to badger and the above comments have been addressed.

The above alterations are shown on revised Planning Drawing ref: 3732-01-11 that supports this response.

Buffering of Hedgerows

The PDAS also states in 5.3.36 ‘..existing hedgerows within the Site would remain throughout the life of the development by ensuring a minimum of 6m buffers.’. Whereas NE4 of the North Herts Local Plan requires ‘12 metres of complimentary habitat should be provided around wildlife sites trees and hedgerows.’. Hedgerows and field boundary habitats are referred to frequently in the Ecological Assessment as providing valuable habitat to a variety of species. To maximise on this benefit and secure continued connectivity for the hedgerows to act as wildlife corridors successfully a wider buffer would be expected.

In relation to the above comment, requiring complimentary (note the policy NE4 does not specify outright buffers) habitats within 12m of existing hedgerow, it should be considered that the Resubmission Scheme will remain open for use by all but the largest mammal species (e.g., deer and livestock). A minimum of 6m species diverse grassland will be created between existing hedges and the solar fence line, with a further 5m minimum gap between the fencing and solar PV modules. Even where solar PV modules are present, these will be raised off the ground with the land underneath sown with a grassland seed mix and available for use by mammals and other wildlife. There will be no permanent proposed as part of the Resubmission Scheme.

As such, given the absence of any barrier to movement of fauna, either physical or indirectly via other factors (e.g., lighting), and considering the conversion of arable land of negligible ecological value to species diverse grassland and permanent pasture of higher value within and beyond the 12m complimentary habitat zone, it is considered that the Resubmission Scheme represents habitat complimentary to existing hedgerow habitat. Hedgerows will continue to provide connectivity in the local landscape and these networks will be enhanced through the following:

- Gapping up of existing hedgerow;
- Creation of new hedgerow; and
- Creation of adjacent grassland and woodland habitats.

It is acknowledged that in some discrete areas (i.e., parts of the southern and western Site boundaries) new access track will be created within the 12m habitat zone of a hedgerow, however given the minimum 6m buffers, absence of lighting and extensive habitat creation and enhancement elsewhere, this is not considered to cause fragmentation or disrupt the ecological functioning of the hedgerows on and bordering the Site.

Biodiversity Net Gain

The application is subject to a requirement to deliver 10% Biodiversity Net Gain and a Statutory Metric calculation has been provided with the application but this uses ‘area/compensation not in local strategy/ no local strategy’ as strategic significance but this is incorrect in places. Until a Hertfordshire Local Nature Recovery Strategy has been published applicants are advised that the Herts Ecological Networks (HEN) Map should be used instead to assess strategic significance. Given the scale of the site and high number of units involved the gains and ongoing management of the habitats on site will be informed by a Habitat Management and Monitoring Plan to be secured via a s106 agreement.

The biodiversity net gain calculation has been revised to reflect the Herts Ecological Network. A summary of results of the revised biodiversity net gain calculation is presented in **Inset 1** below, with full details provided in full within the Metric spreadsheet submitted separately.

The Resubmission Scheme continues to result in a biodiversity net gain substantially in excess of the statutory minimum of 10% across each habitat type (habitat units, Hedgerow units and watercourse units) and meets all embedded trading rules.

The Resubmission Scheme will deliver a Habitat Management and Monitoring Plan (HMMP) subject to a suitably worded condition.

Inset 1: Biodiversity Net Gain Results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	67.87
	<i>Hedgerow units</i>	15.86
	<i>Watercourse units</i>	0.24
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	90.14%
	<i>Hedgerow units</i>	82.38%
	<i>Watercourse units</i>	17.65%

Prepared by: J. Stevens BSc (Hons)

Reviewed by: A Logan MSc MCIEEM