

Comments on the Condition papers relating to Priory Farm Solar Array be land at Graveley Lane and to the East of Great Wymondley Application number 21/03380/FP
By Wymondley Parish Council and the Great Wymondley Village Association

Observations on the documents: -

- General
 - It would have been helpful if all the conditions papers had been addressed correctly. The application site is not “Land to the North and East of Great Wymondley Arch Road Great Wymondley Hertfordshire”. It has always been agreed that the description would be land at Graveley Lane and to the East of Great Wymondley. Can this be altered on the database please to avoid confusion.
 - There has been a consistent theme throughout our review of Communication. This work, and indeed the subsequent location of such a large development on the edge of a village, is going to need a constant line of communication to not only resolve issues, but by planning and making the community aware of each step avoidance of potential issues.
 - Another theme throughout is how is the commitments made at this stage going to be policed for 40 years. When the construction team leaves, who makes sure grazing levels are maintained, skylark habitats protected, fencing, landscaping, signage etc are maintained and that there is an oversight onto the maintenance regimes for avoidance risks to the local community such as fire, flooding, noise and other disturbances.
 - Also importantly to review the use of the solar farm, making sure it does not fall into disrepair and that it continues to produce power. And to make action should it cease to function.
 - Who will monitor and report on the long-term compliance with each condition? We would like to see a named individual or role in the Council who accepts the responsibility and acts as an effective long-term interface with the local community through the Parish Council and great Wymondley Village Association.
- Construction Environmental plan – Condition 6
 - We have received the very comprehensive Construction Environment plan.
 - We note that there will be clear leads at Project Manager Mark Pollard and Site Manager level and there will be a direct line of communication set up to allow points of concern to be brought to their attention.
 - A letter is to be circulated to the local communities. Again, an important step to assist with communication.
 - There are very many requirements in the Conditions as represented in this plan, keeping rigidly to them will be no mean task but critical for the safe co-existence of the development and local community.
 - We suggest a liaison review level with the Project Manager and Village Association and Parish Council to review issues and resolve problems on an ongoing basis throughout the planned work.

- **Landscaping and Ecology Management Plan – Condition 9**

We think that the following changes should be made to the Landscape Ecology and Management Plan (LEMP)

- Any proposed use of herbicide should be agreed in writing with the LPA. Alternative means of controlling weeds should be used, including non-plastic mulch mats and strips for newly-planted trees and shrubs.
 - **Reason:** The herbicide use specified is not conducive to achieving biodiversity improvements. ‘Weeds’ are wild flowering plants in most cases and contribute to biodiversity gains and support other species including pollinators. Such ‘weeds’ are only a problem if they are swamping newly planted tree/shrub stock. Appropriate grassland management techniques should ensure that dominance of these areas by one or a few aggressive plant species is controlled. Exceptions are invasive non-native species and weeds controlled under the Weeds Act 1959, which may be controlled by spot-spraying.
- All mulches and composts must be peat-free.
- All tree and shrub plants should be UK grown.
 - **Reason:** The importation of foreign-grown planting stock risks importing tree diseases.
- The hedgerow species list should be more varied, potentially to include Wayfaring tree (*Viburnum lantana*), Whitebeam (*Sorbus aria*), Dogwood (*Cornus sanguinea*), Purging buckthorn (*Rhamnus catharticus*), Alder buckthorn (*Frangula alnus*) and Holly (*Ilex aquifolium*).
 - **Reason:** These would provide a greater variety of wildlife habitat and support for specific species. For example, the two buckthorn species are the larval foodplant for brimstone butterfly.
- The woodland species list could include Wild cherry (*Prunus avium*), Holly (*Ilex aquifolium*) and Hornbeam (*Carpinus betulus*).
- The applicant should establish whether deer are present locally. If so, protection of new planting must include suitable deer fencing or individual guards.
- Bird and bat boxes should be replaced as required and bird boxes cleaned of old nesting material each winter.
 - **Reason:** winter cleaning out of nesting material reduces the spread of disease.
- Sheep should be excluded from the site from May to July.
 - **Reason:** Summer grazing prevents flowering plants from flowering and setting seed. As only two seed mixtures are specified, one within the solar array and one in the perimeter grassland, the flowering times can be expected to be the same within the areas sown with the same mixture, such that rotational grazing during the flowering period will inhibit flowering on some of the site.
- Surveys of species groups not covered in the pre-application surveys (bats, invertebrates) should be carried out at the appropriate times of year before construction commences, and thereafter regular monitoring of wildlife on the site should be undertaken, to include bats, birds, invertebrates, other fauna and flora.
 - **Reason:** This is an opportunity to collect valuable data.
- We note that the optimum performance levels would be achieved: Pasture five years, Species Rich Grass 10 years, Woodland 15years, Hedgerows 12 years.
- This is based on an effective plan of implementation and a very rigorous management regime.

- The condition document is described as a working document which needs regular review and updating throughout the lifetime of the development.
 - We note the strong recommendation that site clearance should be undertaken outside the period of 1st March to 31st August and trust that this will be adhered to.
 - Naturally when new planting is undertaken there will be failures. To achieve the level of screening promised they must be dealt with without delay.
 - Again, timing and quality of maintenance regime will impact the effectiveness of the planting.
 - We would wish to see a regular review and liaison with the Parish Council and Village Association to report progress to plan, issues and challenges.
 - There should also be a simple line of reporting matters to the developer as the most eyes on the sites environment and ecology will be from those walking and using the pathways.
- **Fire management plan, - Condition 10**
 - The management plan seems very comprehensive and detailed though on close review is somewhat generic.
 - We previously raised concerns about the preparedness of the local fire service and if consultation had occurred. There is no confirmation of this. That should happen
 - We also raised concerns about fire appliance access and turning and again that is not addressed
 - Finally, we believe there should be a proper liaison structure with the local community through the Great Wymondley Village Assn and the Parish Council.
- **Hard and soft landscaping - Condition 12**
 - We have reviewed the details which appear to be in line with original proposals.
 - Mobility gates should be sufficient size to allow access for off road mobility scooters.
 - Hard landscape areas and roadways. These should be carefully considered in terms of water drainage and run off as all hard surfaces will increase the flooding risk.
 - Careful management and replacement regime should be in place not only in the early years but throughout the scheme's lifetime.
 - Long term management and monitoring of the planting needs to be undertaken on a regular basis.
 - Attenuation basins and retention basins. The effective operation of these is critical to reduce the increased risk of flooding from the land. Will a management and monitoring regime be put in place and if what is proposed fails to meet the demands of future weather conditions, what responsibility will the owners have to improve the provision?
- **Construction traffic – Condition 15**
 - Construction traffic must not enter through Little or Great Wymondley but from the A1(M) junction 9.
 - Times of operation must be maintained
 - Any additional vehicles must be kept away from the site until capacity has been created.
- **Construction Environment Plan - Condition 16**
 - During the construction phase hours of operation, noise levels, lighting etc to be rigidly monitored in line with the conditions set out.
 - Who will monitor and what action will be taken if the conditions are breached?

- **Drainage planning and flooding mitigation strategy – Condition 17**
 - The recent rain has brought the desperate situation in Priory Lane into sharp focus. The lane has literally been running as a river with water flowing off the fields that will form and adjoin the Solar Farm.
 - We are aware that the development cannot be expected to solve the flooding issue but neither can there be any risk of it making it worse.
 - The developer's consultants suggested that the inevitable destruction of the land drains may perversely help the situation. The reality is that damaging the drains as part of the archaeological works will only result in major areas of standing water on the solar farm which if in the areas of battery storage, electrical equipment etc could be very dangerous. Also risk of foot rot for sheep.
 - We believe that the fields should be well drained and that the developer's flooding proposals should be sufficient to take the levels of water that we have seen in recent weeks.
 - If this is not so what recourse will the council have to seek further improvement to the attenuation basins and water retention areas
 - Will there also be monitoring of good management and maintenance of the system?
 - A few years ago, a major report was commissioned by Herts County Council into the Little Wymondley flooding problems. No action has been taken and it remains our contention that before development projects of solar or housing take place or as a part of them, the McCloy report should be implemented in full
 - **Soil Management- Condition - 20**
 - The Soil management regime appears to apply to the area of the excavation works at the sub-station.
 - Clearly this is a species rich boundary area and great care must be taken to comply with the soil management plan.
 - We do note that the access point of the cable to the sub-station is no longer on Blakemore End Road but around the corner at the junction of Stevenage Road and Sperberry Hill. Is this a change that has been approved somewhere in planning terms? It adds further to the cable length disruption and time.
 - **Arboricultural method statement - Condition 21**
 - The retention and management of trees within the site is of the utmost importance so as not to damage the long terms open landscape and views across the land.
 - We note that there are some 29 trees at risk due to the works. Of these 5 are Grade A and 18 Grade B. This is disappointing and we would wish the Council to ask the developer to revisit these locations to see how these trees can be protected. Given the open agricultural land it is surprising so many are affected.
 - We also note that 10 category U trees will be removed. Whilst we accept some trees maybe beyond recovery this number should be as few as possible, especially as they are, in a number of cases, old oaks.
 - As with other aspects the short and long-term management of the trees is of the utmost importance.
 - **Skylark mitigation Strategy - Condition 22**
- On the whole this is a satisfactory document. It takes full account of current science and guidance. I think two requirements should be added:
- Breeding skylarks on the mitigation fields should be surveyed using the Bird Survey methodology set out in Appendix 1 of the SMS before initiating the mitigation strategy.

- **Reason:** This is to ensure that the minimum number of skylark territories predicted are present on these fields, thus ensuring that suitable skylark habitat is present. This is not provided for in the SMS (see paragraph 2.2.3).
- The skylark plots should be maintained on an annual basis until the proposed development site is decommissioned and fully restored to arable farmland or to another suitable skylark habitat.
 - **Reason:** Paragraph 2.4.7 of the SMS referring to the operational life of the proposed development does not allow for restoration of suitable skylark habitat on the site: decommissioning and restoration may be delayed after the operation of the solar site has ceased.
- We note that the skylark mitigation is now planned to include all the farmland around the Solar farm.
- We assume an agreement has been for long term protection of the arrangement.
- What steps are in place if the land ownership changes?
- How are the nests to be monitored and protected? We would propose a Ranger who could report back to the developer NHDC and the Parish and Village Association. Naturally, the public must have an understanding so that they do their part in the safe creation of the habitat.
- Grazing management plan – Condition 23
 - We note that the grass leys have to be up and running within three years of the site exporting electricity.
 - We have also noted the proposed grazing regime of having some four sheep per hectare.
 - Whilst we understand that the number of sheep depends upon number of weeks grazing, lambing etc, this strikes us as low. As an appropriate comparator the adjoining land is operated at 10 sheep per hectare.
 - We have always been told the solar farm takes less than 5% of the land but even allowing some flex, less than half cannot be right.
 - We would be seeking a number of say seven per hectare if the developer is to be true to his promise of continuing to use the land for agricultural use.
 - As with other matters, management review and reporting will prove critical and we would like to see the developer's proposals for long term oversight by the Council and reporting back to the community.
- Detailed drawings Access – Condition 25
 - Noted, all seem in line with the original proposals.
- Parking bay – Condition 26
 - We have reviewed the proposals that appear in line with the original plans.
 - We would just ask that the hedgerow loss is minimised and the planting is replaced as soon as the parking bays are removed.

Produced from input from Wymondley Parish Council, Great Wymondley Village Association and those engaged in the Public Inquiry by Cllr Paul Harding 29th September 2024