

Proposed Solar Farm & Battery Store Little Llwyn Onn, Cefn Road, Wrexham (P/2022/0541)

Ecological Addendum

Introduction

This document has been produced to inform the above planning application for a proposed solar farm and battery store at Little Llwyn Onn, Cefn Road. There have been various correspondence between the applicant, Wrexham CBC and NRW following the initial planning application submission, relating to great crested newts (GCN) and Net Benefit for Biodiversity (NBB). These issues were discussed at a recent meeting between all parties on 8th December, with a consensus reached over all of the outstanding concerns.

This document provides a summary of the concerns raised by WCBC / NRW and how these concerns have been addressed as part of a revised submission of documents. This note sets out a summary of the points that have been discussed followed by responses by Etive Ecology on behalf of the applicant *in italics*.

Survey Data & Status of GCN

Concerns were raised over the level of GCN survey effort undertaken and the timing of that survey effort. A single round of eDNA surveys was undertaken in June 2020, which is considered to be late in the survey window and outside of the optimal survey period. The findings of the DNA survey indicated absence of GCN within some ponds where previously they had been recorded. A number of ponds were also found to have become unsuitable for GCN.

As a result of these survey findings, WCBC/NRW were concerned that the ecological assessment underestimates the conservation status of GCN local to the site. WBC/NRW acknowledged that the local GCN population is in an unfavourable and declining condition and noted that there is an obligation to improve the current situation, particularly where a deterioration in population size has been identified.

Etive Ecology acknowledge the sub-optimal timing of eDNA survey and recognise that the results should be treated with caution. It is likely that the survey effort underestimates the true distribution of GCN local to the site. To reflect this uncertainty, the sensible approach is to over-mitigate the potential impacts on the local GCN population. The whole area of land within the red-line site, north of Cefn Road, will therefore be enhanced for GCN and managed for the operational lifetime of the solar/battery development.

If further GCN surveys are required to inform the subsequent GCN licence application, to establish the appropriate number of GCN trapping days, then these can be carried out using traditional survey techniques in March-June 2023.

Net Benefit for Biodiversity

Wrexham CBC noted the Welsh Government's Planning Policy Wales and subsequent letter to LPAs requiring all development to provide a Net Benefit for Biodiversity (NBB). WCBC were not satisfied with the level of detail presented to demonstrate that the proposals would deliver NBB.

Concern was specifically raised regarding the area of land being offered as mitigation, as well as the proposed location of a new pond. Further details were also required in terms of long-term habitat management. Clarification on the width of retained field margins was also requested.

The applicant has confirmed that the entirety of the red line application site boundary will form part of the mitigation/compensation package for the proposed scheme. The whole area north of Cefn Road will be subject to enhancement and long-term management to ensure the delivery of NBB arising from the scheme. The site will effectively be transformed from a high intensity agricultural regime to a low-input conservation-led management system.

The proposed pond has been moved away from existing trees. An additional pond has also been added to the proposal. Both ponds will be 50% larger than originally shown on the site plans, to further improved GCN breeding capacity. One hibernacula will be provided immediately adjacent to each pond.

The long-term management for the site will comprise low-intensity grazing of the grassland beneath the solar panels – a maximum of 3 livestock units per hectare (sheep) during the months of April, May, September and October, where a more typical stocking density might be up to 10 per hectare. The grassland to the south of the solar farm fencing will be managed by a traditional hay cut in July and a second cut in September (if required). All cuttings will be collected and retained on site in the form of grass heaps, which offer suitable egg-laying habitat for grass snakes.

Field margins will be retained around Compartments 1 and 2. The margins comprise the land located between the solar farm security fence and the existing field boundary (either a ditch or a hedgerow). Across Compartments 1 and 2 these vary from between 5m to a maximum of 16m. These areas of field margin will be retained and will be subject to management in the form of cutting to 150mm height in July and a follow-up cut in September/October if required.

Mitigation Strategy

NRW have requested further information relating to the fencing design, specifications and locations, considerations of access, monitoring and maintenance, as well as fence removal and proposed timescales for the mitigation strategy. Additional issues raised by NRW are covered in the other sections of this document.

Fencing design will meet the industry standards detailed in the GCN Mitigation Guidelines (as shown below). All fencing will comprise upright temporary amphibian fencing (TAF) with pitfall traps every 10m and carpet tiles or felt at alternate 10m intervals. The fencing will extend around the whole of the development footprint north of Cefn Road, as shown on Figure 2 of the GCN Mitigation Strategy document already submitted. Access points for construction vehicles will be provided by way of openings in the fence-line. These openings will be up to

10m wide and the TAF will be turned back to prevent GCN from re-entering the site after the completion of trapping.

Trapping effort will be undertaken during the period March to October inclusive. Acceptable trapping nights will be those where the overnight low temperature does not fall below 5°C. Upon completion of trapping effort, weekly checks of the TAF will be undertaken by a competent ecologist until such time as the construction works are completed and the fence can be removed. If the fence remains in place over the hibernation period (November to February inclusive) then the fence checks can drop to a monthly frequency. Any damage or issues with the fence will be recorded and will be fixed within 48 hours. The fencing will only be removed upon completion of all works and outside of the hibernation period. Fence removal will be supervised by a GCN-licensed ecologist.

Pond creation works will be undertaken at the earliest opportunity. Ideally this will be following the installation of the TAF. This will give the ponds the maximum duration to establish.

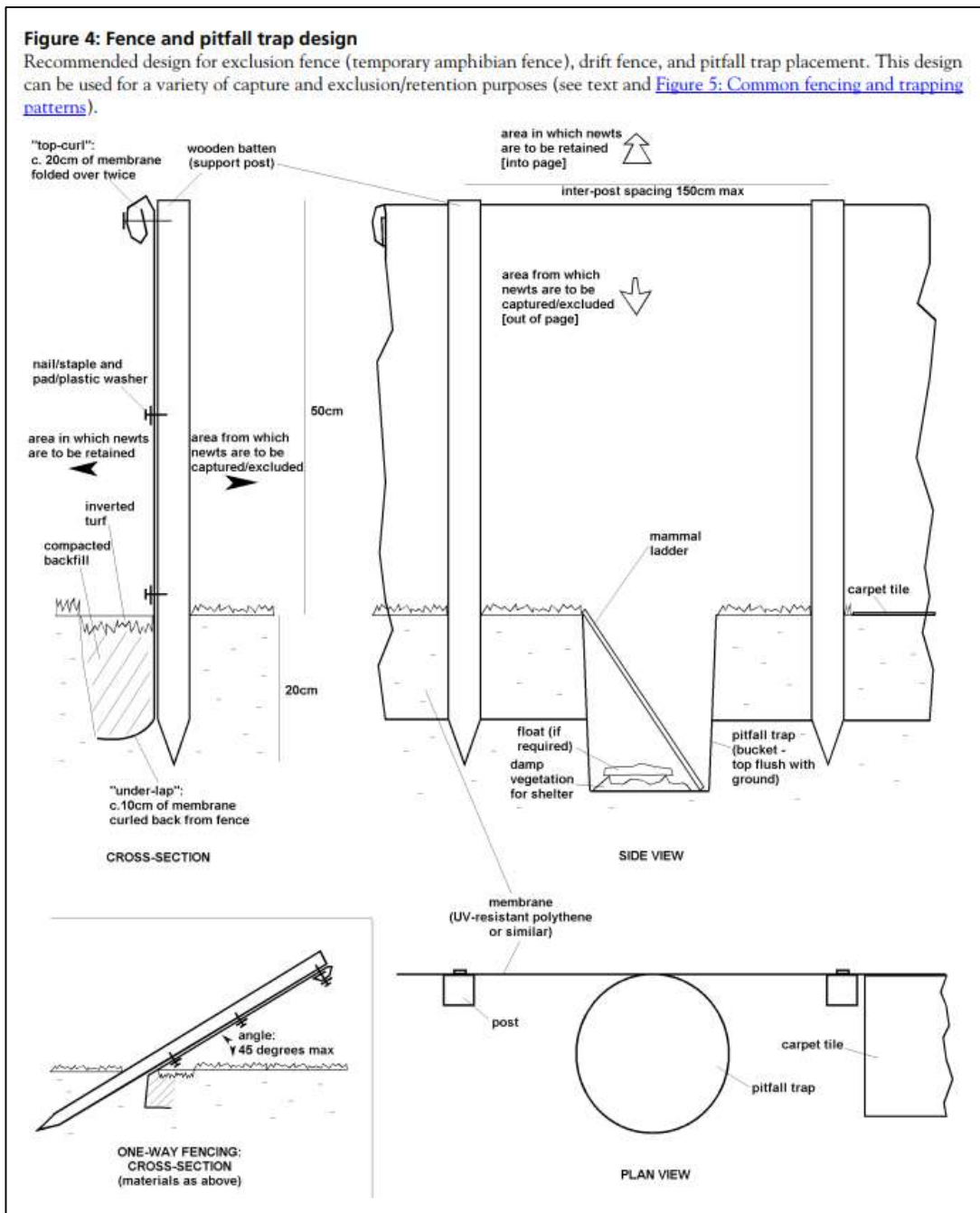


Fig 4. GCN Mitigation Guidelines (2004)

Compensation Area

Both NRW and WCBC raised concerns regarding the size of the proposed compensation area. Reference was made to the area being small in size and to the unsuitable location of the proposed pond beneath existing trees. Additional ponds were also considered to be necessary. NRW have requested further details relating to the compensatory proposals, including a plan showing the extent of the area.

Etive Ecology can confirm that the compensation area is considered to be the extent of the whole red line site boundary, north of Cefn Road (c. 30 acres). The entirety of the land within the site boundary will be subject to ecological enhancements and conservation site

management for the operational life of the solar farm. Details of habitat management have been mentioned above and are detailed in the next section below.

As previously noted, the one pond originally proposed for creation will be moved to the land south of Compartment 1 and outside of the operational area of the solar farm. Following discussions with WCBC, a second pond will also be created in this area. Both of these ponds will be 50% larger in area than the size of the pond originally proposed.

The attached revised layout clearly illustrates the habitat arrangement of the site post-development. The plan shows the enhanced areas and indicates the proposed management of the various different habitats and features.

Habitat Management

WCBC raised concern over the level of detail provided in relation to long-term habitat management of the site post-development. It has been requested that a Habitat Management Plan of no less than 40 years should be provided. NRW have also requested that further information be provided in relation to the current and proposed tenure of the site post-development.

The attached layout plan shows the whole of the red line site boundary north of Cefn Road as being subject to ecological enhancement and long-term management. The applicant has confirmed that management will extend for the operational life of the solar farm. A detailed Habitat Management Plan will be provided as part of the application for a GCN License. Habitat Management will follow the principles below:

- *Species-rich grassland (Compartments 1 & 2); land within Compartments 1 & 2 will be sown with an appropriate species-rich grassland seed mix and managed to provide suitable species-rich habitat for general biodiversity. The grassland will be subject to low-density grazing by sheep (3 LSU/ha) during the months of April, May, September and October.*
- *Species-rich grass (south of Compartment 1); this area of grassland will be un-grazed and will be managed by a twice annual cut – first week of July and again in September (if required). All cuttings will be collected and used to form grass heaps.*
- *Field margins; will be subject to management in the form of cutting to 150mm height in July and a follow-up cut in September/October if required. These corridors will not be grazed and will be managed to provide habitat corridors for a wide range of biodiversity interests, including GCN.*
- *Ponds; will be managed to control bankside, marginal, emergent and submerged vegetation coverage, to optimal levels for GCN breeding. All such activities would take place during the hibernation period and by suitably experienced contractors under the supervision of GCN-licensed ecologists.*
- *Hibernacula / grass heaps; would be managed to retain their presence, size and structure. The aim is to provide excellent shelter for over-wintering amphibians and to provide suitable egg-laying sites for grass snake.*
- *Hedgerows; will be managed to encourage species-richness through rotational management. Hedge-bottoms will be encouraged to widen whilst hedgerow height will be managed to prevent over-shading of the solar farm.*

Long-term monitoring will be required to ensure that habitat management is being undertaken as per the HMP and that the measures are being effective in delivering the target habitats.

Monitoring will comprise botanical assessments of grassland, field margins and hedgerows, HSI assessments of the ponds, and presence/absence surveys of hibernacula and grass heaps. Monitoring will take place in Year 1-5 post-development and then every 2 years thereafter. GCN surveys will also be specified as part of the GCN licence.

The applicant is seeking permission on behalf of the owner Cefn Park Solar Limited. All rights and obligations to build, connect and operate such a facility are sat within this company. The commitments to this management strategy can be recorded through planning condition and within the future GCN Licence attached to the Development, such that any change of control with this company does not degrade commitments for the Development to perform the required management obligations.

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