

Date: 27 April 2023  
Our ref: 429605  
Your ref: 22/P/1450/FUL



Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY:** [planningsupport@n-somerset.gov.uk](mailto:planningsupport@n-somerset.gov.uk);  
[Andrew.stevenson@n-somerset.gov.uk](mailto:Andrew.stevenson@n-somerset.gov.uk)

Dear Mr Stevenson

**Planning consultation:** 22/P/1450/FUL UPDATED INFO (BNG & HEP) - Proposed development of a 49.9MW solar farm and associated infrastructure

**Location:** Land at Yanel Farm, Churchill Green Churchill, North Somerset

Thank you for your consultation on the above dated 14 April 2023 which was received by Natural England on the same date

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE:**

#### **FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES and PROTECTED LANDSCAPES**

As submitted, the application could have significant effects on the North Somerset and Mendip Bats Special Area of Conservation and on the Mendip Hills Area of Outstanding Natural Beauty. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

As set out in our letter dated 18 August 2022, and in emails dated 3 February 2023 and 7 February 2023 (to Soltys Brewster), the following information is still required:

- Updated HEP calculation (see comments below)
- Plan showing proposed HEP habitats and BNG habitats
- LVIA – viewpoint photos taken in winter
- LVIA – photomontages showing a CGI of the site as developed
- Habitats Regulations Assessment

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

#### **HEP & BNG Assessment**

We have reviewed the HEP and BNG Assessment (Soltys Brewster, 15 March 2023). We welcome reference to the methodology set out in the North Somerset and Mendip Bats SAC Guidance on Development SPD ("the SPD"). We note that a Density Band multiplier of 1 has been used because the site lies within Consultation Band C according to the SPD. However, the proposals cover a large site in an area highly likely to be used by foraging and commuting Horseshoe bats of both

species. In the absence of any targeted surveys, it must be assumed that Horseshoe bats are foraging on all suitable habitat which is affected by the proposals. In line with the SPD guidance, the Density Band multiplier should be increased where there is foraging behaviour and therefore we require a multiplier of 1.5.

We require clarification on the Replacement Habitat calculation. It is specified in the assessment that hedgerow and ditch habitats have not been included in the assessment because they will be retained as part of the final layout design. This being the case, existing hedgerows should not be included in the replacement habitat calculation. It is not clear whether newly planted hedgerow or existing hedgerow is referred to.

We also require a plan showing the proposed locations of replacement or enhanced bat habitat and BNG habitat. It is essential that replacement bat habitat is well designed in order to function as effectively as possible.

### **Landscape & Visual Impact Assessment**

As proposals on this scale will form a significant part of the view from sensitive locations within the AONB, we have previously requested the inclusion of viewpoint photos taken in winter. We have also requested photomontages showing CGI of the site as developed.

We note the objection of the Mendip Hills AONB Unit (31 August 2022) and draw your attention to their concern that the proposals will have a significant impact on the special qualities of views out from the AONB across the North Somerset Moors to the Severn Estuary and Wales beyond.

If you have any queries relating to the advice in this letter please contact me on 07867 900 281.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above has been provided.

Yours sincerely

**Alison Howell**  
**Lead Advisor, Sustainable Development**  
**Wessex Area Team**