

6 June 2024

Anesco Limited Unit 9, The Green Easter Park, Benyon Road Berkshire RG7 2PQ

SLR Project No.: 402.065269.00001

Frome Valley Solar Farm, Revision: 6.0

Dear Sirs

RE: Nutrient Neutrality Statement, Proposed Frome Valley Solar Farm, Stoke Edith, Herefordshire HR1 4NGq

1.0 Introduction

- 1.1 SLR Consulting have been instructed by Anesco Limited (the Client) to prepare an initial Nutrient Neutrality Statement (NNS) relating to the construction of a proposed solar farm at Stoke Edith, near Hereford, HR1 4HG.
- 1.2 The proposed solar farm has a total area of 29.90 hectares (Ha) and is located immediately south of the River Frome. A railway line is indicated immediately north-east of the site, whilst a minor roadway is indicated immediately east of the site. The site is located approximately 4km east of the city of Hereford. The remainder of the surrounding area is rural, and mainly comprises agricultural fields. Refer to Drawing No. C0002470_02 Rev F (Site Layout), by Anesco Limited, enclosed within this Technical Note.
- 1.3 The site currently comprises four agricultural fields. These are currently farmed by a tenant farmer, who has advised that the three northern fields are currently used for grazing cattle, and the southern field is used for arable farming.

River Wye Special Area of Conservation

1.4 The River Frome is a tributary of the River Lugg, which is itself a tributary of the River Wye and which joins the River Wye at a point approximately 3km south-west of the site. The River Wye is designated as a Special Area of Conservation (SAC), due to the presence of



SLR Consulting Limited

6 June 2024 SLR Project No.: 402.065269.00001

Atlantic salmon, brook lamprey, river lamprey, sea lamprey, Twaite shad, white-clawed crayfish, bullhead and otters¹.

- 1.5 The ecological significance of the River Wye is legally underpinned by the River Wye Site of Special Scientific Interest (SSSI), which is currently in 'unfavourable declining' condition due to phosphate pollution², which is mainly from agriculture and wastewater treatment. This NNS has been prepared according to Natural England (NE) advice for development proposals with the potential to adversely affect nutrient pollution for designated habitats sites³.
- 1.6 A Nutrient Management Plan is currently in place for the Wye catchment, which includes an action for 'Strategic assessment of potential Phosphorus interventions in the River Lugg catchment'.⁴ This NNS therefore is required to demonstrate that the proposed development will not result in increased phosphate loading to the Wye and Lugg catchments.

Proposed Development

1.7 The proposed development comprises the installation of solar panels capable of producing up to 21 megawatts (MW) of power, with associated electrical sub-station and access roadways. No residential or commercial accommodation will be constructed within the site.

Construction Phase

1.8 During construction of the proposed solar farm, temporary 'portaloo' style toilets will be provided on site for the use of construction staff. These will be emptied off site as required, in accordance with the relevant legislative requirements. The construction period is temporary (over 35 to 40 weeks), and these arrangements would be for the short term only.

Operational Phase

- 1.9 The proposed solar farm will not require a permanent site-based staff and no staff offices or toilets will be constructed on site. Therefore, the operational phase of the proposed development will not result in any additional phosphate loading to the Lugg and Wye catchments.
- 1.10 A surface water drainage strategy has been prepared for the proposed solar farm⁵. It is not possible to infiltrate surface water runoff to ground, due to the presence of shallow

⁵ Report No. 402.065269.00001 Flood Risk Assessment and Surface Water Drainage Strategy (by SLR Consulting), May 2024.



^{1 &}lt;a href="https://sac.jncc.gov.uk/site/UK0012642">https://sac.jncc.gov.uk/site/UK0012642 accessed April 2024

² https://naturalengland.blog.gov.uk/2023/05/30/assessing-the-health-of-the-river-wye-and-its-catchment/accessed May 2024

³ NE785 Revised Edition Natural England Water Quality and Nutrient Neutrality Advice (Natural England, 16 March 2022) https://publications.naturalengland.org.uk/publication/4792131352002560 accessed April 2024

⁴ https://www.herefordshire.gov.uk/downloads/file/23069/river-wye-sac-nutrient-management-plan-phosphate-action-plan-november-2021 accessed April 2024

6 June 2024 SLR Project No.: 402.065269.00001

groundwater. Therefore, surface water runoff will be discharged to the River Frome as per the existing situation. Runoff will be discharged via the existing drainage ditch network on the site, and a proposed new conveyance swale. This swale can provide a minimal amount of particulate phosphate removal, due to sedimentation and uptake by plants⁶.

- 1.11 The site will be used for grazing sheep post development, in addition to the proposed solar panels. It is recommended that fences are provided to prevent the sheep grazing within 10m of the River Frome, or within 5m of any existing ditches or proposed swales. This will help to prevent sediment and nutrient runoff from the site to the River Frome.
- 1.12 Sheep excrete a total of 1.8 kg of phosphate per animal, whilst cattle excrete between 5.0 and 19.4 kg of phosphate per animal⁷. Therefore, the proposed change in grazing from cattle to sheep will reduce phosphate loading from the site post development.

Conclusions

The proposed solar farm will not generate additional phosphate inputs to the River Frome and the wider River Wye catchment, and no mitigation measures will be required. Phosphate loading from the site will reduce post development with the proposed change from cattle to sheep grazing.

I trust that the information contained within this letter report is clear, however should further information be required, please contact me using the details below.

Regards,

SLR Consulting Limited

Helena Preston

Helena PrestonSenior Hydrologist – Hydrology and Hydrogeology

Office phone +44 3300 886631 Mobile 07977 627414 Email hpreston@slrconsulting.com

Enclosures: Drawing No. C0002470_02 Rev F (Site Layout) by Anesco Limited

6 Bradley, J. Haygarth, P. Stachyra, K. and Williams, P. (2022) Using SuDS to reduce phosphorus in surface water runoff. C808 CIRIA, London, UK

⁷ Gooday, R. Gittins, J. Moorhouse, D. Wheeler, K. & Wright, E. (2016) To what extent could water quality be improved by reducing the phosphorus content in animal feed? Final Report CRW2015/03





