

Flaxlands Solar Farm

Arboricultural Impact Assessment

Ampyr Solar Europe

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Prepared for:

Ampyr Solar Europe

Prepared by:

AECOM Limited

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1. Introduction

1.1 Background

- 1.1.1 AECOM has been instructed by Ampyr Solar Europe (the 'Applicant') to carry out an Arboricultural Impact Assessment of the development proposals at Flaxlands Farm, Wootton Bassett (hereafter referred to as 'the Site' and 'Proposed Development') in support of a planning application.
- 1.1.2 This report identifies the likely direct and indirect impacts of the Proposed Development along with suitable mitigation measures, as appropriate. The Tree Constraints Plan (TCP), included as Appendix A and the Tree Survey Schedule, included as Appendix B, show the trees in the current context of the Site. The Tree Protection Plan (TPP), included as Appendix C, identifies trees to be removed and how retained trees are to be successfully protected.

1.2 Trees and the Planning Process: National Policy

- 1.2.1 The National Planning Policy Framework (NPPF, 2024) seeks to ensure that new development is sustainable and underlines the importance of Green Infrastructure, of which trees form an integral part. This encompasses a recognition of the importance of trees in relation to the management of air, soil and water quality along with other associated ecosystem services and climate change adaption. The NPPF also seeks to achieve the protection and enhancement of landscapes and a net gain in biodiversity. Finally, it specifically identifies veteran and ancient trees and woodland as a highly valuable and irreplaceable habitat.
- 1.2.2 The NPPF (2024) includes the following statements in relation to trees:
- "136. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users".*
- "193. When determining planning applications, local planning authorities should apply the following principles:*
- ...c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".*
- 1.2.3 'BS5837:2012 Trees in relation to design demolition and construction – Recommendations (BS5837:2012)' provides a framework which sets out how trees should be considered in this context and also explicitly applies to development where planning consent is not required.
- 1.2.4 BS5837:2012 recommends that a tree survey is undertaken to identify the quality and benefits of trees and the spatial constraints associated with them. This is then used to produce a Tree Constraints Plan (TCP) showing the above and below ground constraints associated with trees. This drawing is used to inform the design process and to allow the retention of good quality trees where appropriate.
- 1.2.5 An Arboricultural Impact Assessment is then developed to identify the likely direct and indirect impacts of the Proposed Development, and a TPP is prepared to identify trees to be removed or retained and to illustrate how retained trees are to be protected. An Arboricultural Method Statement is often required as a condition of planning consent to detail how sensitive operations are to be achieved in proximity to retained trees. These elements are the minimum normally required for a planning application and are intended to ensure both a sustainable and harmonious relationship between trees and new development.

1.3 Local Policy Context

- 1.3.1 Local Planning Authorities (LPA) in the UK have a statutory duty to consider both the protection and planting of trees when considering planning applications. The potential impact of development on all trees (including those not protected by a Tree Preservation Order or other statutory designations) is therefore a material consideration.
- 1.3.2 The Site is within the planning authority of Wiltshire Council. A desktop review of Wiltshire Council's planning policies relating to trees was undertaken on 22nd January 2025.
- 1.3.3 The following excerpts identify the importance of tree retention, protection and where this is not feasible, mitigation for tree loss in relation to any new development:
- 1.3.4 Wiltshire Council Core Strategy, adopted February 2015¹:

“Core Policy 51 – Landscape

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.*
- ii. The locally distinctive character of settlements and their landscape settings.*
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.*
- iv. Visually sensitive skylines, soils, geological and topographical features.*
- v. Landscape features of cultural, historic and heritage value.*
- vi. Important views and visual amenity.*
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.*
- viii. Landscape functions including places to live, work, relax and recreate.*
- ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.”*

“Core Policy 57: Ensuring high quality design and place shaping

6.131 Careful consideration of topography can enhance the design of a new development in a number of ways including the creation or enhancement views into or within a site, creating attractive skylines through the use of building heights in parallel with contours, ensuring appropriate drainage arrangements, the retention of established planting and trees which can visually enhance a development, ensuring an appropriate relationship with the wider landscape, both visually and in terms of activity and the creation of wildlife corridors.

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

¹ [Wiltshire Council | Core Strategy | \(www.wiltshire.gov.uk\)](http://www.wiltshire.gov.uk)

- i. *the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development.”*

- 1.3.5 Wiltshire Council have included a number of saved policies within their Local Plan from the former North Wiltshire Local Plan² and contains policy relating directly to trees:

“Policy NE14 Trees, Site Features and the Control of New Development

Permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development.

Planning conditions will be imposed and Tree Preservation Orders made, for safeguarding single and small groups of trees in the interests of public amenity.

6.36 It is the duty of the local planning authority to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees. The latter should be substantially native tree species of local provenance.

6.37 It will be expected that assessments to determine the nature conservation and landscape value features both within and adjacent to sites will be undertaken. Details of any assessment should be submitted with a planning application.

6.38 For example, a tree survey should be carried out of the site and directly adjacent land by a competent expert to establish the quality and condition of trees potentially affected by development as appropriate.

6.39 Development shall be designed to ensure the longevity of retained vegetation and features through appropriate management and mitigation measures. British Standard 5837: 1991 - Guide for Trees in Relation to Construction, offers relevant guidance for trees.”

“Policy NE15 The Landscape Character of the Countryside

The landscape of North Wiltshire and its locally distinctive characteristics shall be conserved and enhanced, development will be permitted if it does not adversely affect the character of an area and features that contribute to local distinctiveness.

Development shall take into account:

- i) *The setting of, and relationship between, settlement and buildings and the landscape.*
- ii) *The pattern of woodland, trees, field boundaries, other vegetation and features.”*

- 1.3.6 Wiltshire Council are also in the process of adopting a draft local plan³ (regulation 19) which contains policy relating directly to trees:

“Policy 90 Woodland, Hedgerows and Trees

Proposals for major development shall make provision for the retention and enhancement of Wiltshire’s woodlands, hedgerows, and trees, and shall incorporate these assets into development design as part of the wider Green and Blue Infrastructure (GBI) Network, by:

1. *contributing to the tree planting targets of Wiltshire Council’s Climate Strategy and woodland, hedgerow and tree strategy, following the principles of ‘Right Tree, Right Place’;*
2. *supporting the economic benefits of woodland and tree planting from agroforestry, leisure, tourism as well as wider ecosystem services such as natural flood management and climate resilience;*

² [Wiltshire Council | North Wiltshire Local Plan 2011 | \(www.wiltshire.gov.uk\)](http://www.wiltshire.gov.uk)

³ [Wiltshire Council | Wiltshire Local Plan Pre Submission Draft 2020-2038 \(Regulation 19\) | \(wiltshire.gov.uk\)](http://www.wiltshire.gov.uk)

3. *where applicable, supporting the aims and objectives of the Great Western Community Forest;*
4. *where applicable and acceptable in highway terms, ensuring on major developments that tree lined streets, community orchards and garden tree planting, are fully integrated into proposals;*
5. *seeking, where applicable, to increase woodland and street tree cover in existing urban areas in Wiltshire to create shade, mitigate storm water runoff, improve air quality, sequester carbon, and improve the health and well-being of local communities;*
6. *ensuring the long-term sustainability of woodland, hedgerow, and tree planting, through the appropriate specification of plants, planting accessories, soil volumes, and long-term management to ensure the establishment to maturity of planting schemes in Wiltshire and minimise wastage."*

"Policy 88 Biodiversity and geodiversity

Protection

Development proposals will need to clearly demonstrate how the mitigation hierarchy has been sequentially applied.

Development proposals must demonstrate how they protect features of nature conservation value, both terrestrial and aquatic, and geological value as part of the design rationale. There is an expectation that such features shall be retained, sufficiently buffered, and managed favourably to maintain their ecological value, connectivity and functionality in perpetuity. Furthermore, development proposals must secure and implement measures, including appropriate compensatory measures where necessary, to ensure no net loss of biodiversity and the local biodiversity resource, and to secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a UK National Site Network site must provide avoidance measures in accordance with the strategic plans or guidance where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the UK National Site Network. Any development that would have an adverse effect on the integrity of a European nature conservation site and where the impacts cannot be satisfactorily mitigated, will not be supported.

Local sites, priority habitat and habitats of principal importance and local ecological networks

Development will avoid direct and indirect impacts upon local sites by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- 1. cannot reasonably be avoided;*
- 2. are reduced as far as possible;*
- 3. are outweighed by other planning considerations of overriding public interest;*
- 4. where appropriate compensation measures can be secured through planning obligations or agreements.*

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

Development proposals should avoid negative impacts upon priority habitat, habitats of principal importance, ecological networks, and wildlife corridors, instead promoting their conservation, restoration, and enhancement alongside the recovery of priority species.

Biodiversity in the built environment

In addition to features required as part of biodiversity net gain, mitigation or compensation, all proposals are required to incorporate features of biodiversity value tailored to the specific proposals, relevant local receptors and in accordance with best practice to maximise potential benefits.

As a minimum, the following are required within new proposals:

- 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;*
- 2. provision of integrated bat boxes;*
- 3. provision of overhanging eaves suitable for nesting house martins in all major development, supplemented by the provision of nest cups; and*
- 4. hedgehog highways integrated throughout the design of development (e.g., suitable gaps in all garden fences) between gardens and the wider ecological network to facilitate movement of protected species.*

Other features that should be included (but are not limited to):

- 1. provision of wildflower verges and meadows throughout the development managed to ensure their longevity (e.g., provision of suitable native seeding and topsoil provisions);*
- 2. undertake nature friendly native planting schedules throughout development (e.g., planting wildlife friendly show gardens, incorporating native hedgerows and tree planting);*
- 3. design site lighting to avoid harm and optimise nature conservation (e.g., designing in dark corridors);*
- 4. optimise the ecological value of sustainable urban drainage systems where required (e.g., through the provision of swales and pools, connected to the wider ecological network, planted with native vegetation);*
- 5. incorporate features within the public realm to facilitate nature recovery and access to nature (e.g., bat walls/lofts, swift towers, log piles, insect hotels, invertebrate/bee bricks, reptile hibernacula, green and brown roofs / walls)."*

1.4 Methodology

- 1.4.1 The tree survey has been based on Ordnance Survey Base Mapping and tree features have been plotted indicatively with reference to site features, GPS positions and publicly available aerial photography. Such trees have been marked with an “*” on the Tree Survey Schedule included as Appendix B. As such, all positions for these trees must be considered indicative only and the relative distances of features must be measured out on the Site as required.
- 1.4.2 The survey was otherwise conducted in accordance with the requirements of BS5837:2012.
- 1.4.3 The fieldwork informing this report has comprised a preliminary, non-intrusive, visual walkover survey undertaken from ground level with the specific intention of evaluating the quality and benefits of trees on the Site. The initial fieldwork was undertaken throughout July and August 2024, during which dimensional data and observational information were collected. A diameter tape measure was used to measure stem diameters where feasible. A second site visit was undertaken to survey tree features along Flaxlands Lane on 11 March 2025 which included trees outside of the original survey area.
- 1.4.4 Where further inspection is deemed appropriate to ascertain the condition of the tree or other arboreal features, this has been identified within the preliminary management recommendations. Average dimensions or dimensional ranges have occasionally been used, where appropriate, to best describe features.
- 1.4.5 The Root Protection Area (RPA) is the notional extent of what is considered to be the key rooting area for tree health and function. This is generally depicted as a circle but can be amended to a polygon with an equivalent area in accordance with Section 4.6.2 of BS5837:2012 where the RPA is likely to have developed asymmetrically. The RPA of all surveyed trees is depicted as a circle and no RPAs have been amended, with exception of veteran and ancient trees.

- 1.4.6 The RPAs of trees identified as veteran or ancient during the walkover tree survey have been extended to 15 times their stem diameter (at 1.5m) or 5m beyond the edge of their canopy (whatever is greatest) and is shown on the TCP, as per standing advice from the Forestry Commission and Natural England (2022)⁴.
- 1.4.7 A TCP showing the position of trees and the spatial constraints associated with them is included as Appendix A of this report, which corresponds with the Tree Survey Schedule presented in Appendix B.
- 1.4.8 The tree categorisation process recommended by BS5837:2012 is summarised in the table below and corresponds with the tree canopy outline shown on the TCP (Appendix A) and the information in the Tree Survey Schedule (Appendix B).

Table 1: BS5837:2012 Tree Categorisation process

Category	Definition
A	High quality, minimum of 40+ years remaining contribution
B	Moderate quality, minimum of 20+ years remaining contribution
C	Low quality, minimum of 10+ years remaining contribution
U	Unsuitable for retention, <10 years remaining contribution
1	Arboricultural value
2	Landscape value
3	Conservation or cultural value

⁴ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

2. General Arboricultural Principles

2.1 General Principles

- 2.1.1 Trees are dynamic living organisms which provide essential benefits to society and the wider environment. Any Proposed Development with the potential to impact on trees must take into consideration the value of trees on the Site; the impact of any proposed activity along with any potential future conflicts on the Site. Suitable measures to safeguard retained trees or mitigate the loss of trees (to be removed) will need to be fully considered and may be subject to a condition of planning consent.
- 2.1.2 Tree branches and roots frequently grow across site boundaries and off-site trees can pose a significant constraint and should be carefully considered when assessing the developable space within a site.

2.2 Below Ground Constraints

- 2.2.1 Below ground tree roots and the soil environment in which they grow need to be protected if the tree is to be retained. Trees grow in association with fungi and other soil organisms which are of key importance to tree health. Roots are essential for anchorage, the uptake of water and nutrients, and the storage of energy (carbohydrates) for the future growth and function of the tree.
- 2.2.2 Roots can be damaged by physical severance or wounding (e.g. following excavation of the soil) which can lead to the development of decay and a decline in vitality and/or instability. Raising the soil level can bury tree roots at a depth where suitable conditions for growth are less available. Toxic materials discharged into the soil (such as cement-based aggregates, fuel and chemicals) can lead to root death and dysfunction. Soils can be compacted to levels inhospitable to tree growth with even a single pass of machinery, regular pedestrian traffic or the storage of plant and materials. Relieving compaction can be problematic and may require costly remedial works. Changes in drainage/water levels can also have significant long-term impacts for tree health.
- 2.2.3 The effects of these incursions may take many years to manifest, with a resulting decline in amenity value and potentially the death or failure of the tree. It should be noted that older trees are particularly sensitive to damage and changes in conditions.
- 2.2.4 The RPA is a notional area considered to be the minimum zone that must be protected to avoid any adverse impacts on retained trees. This area is deemed to be particularly important for tree stability, growth, function and health. However, roots may extend far greater distances, with the distribution of the root system relating directly to the availability of suitable conditions for growth (namely oxygen, water and nutrients). It is generally accepted that tree roots are predominantly located in the upper 1000mm of soil; however, roots may develop at deeper levels where conditions allow.
- 2.2.5 Root Protection Areas are calculated as per BS5837:2012 Annex C, D and Section 4.6.
- 2.2.6 The RPA of the existing tree stock is an important material consideration when considering site constraints and planning development activities. The RPA of significant trees on the Site are shown on the TCP (Appendix A).
- 2.2.7 The default position must be that all development, including any associated services will occur outside the RPAs of retained trees. Where this is unavoidable, it may be appropriate to use special measures to install structures, services or surfacing within RPAs which allow the protection of roots and soil structure which are essential for tree growth and keep any incursion to a minimum.
- 2.2.8 Further steps to improve or increase the useable rooting area available to the tree may also be required.

2.3 Soils

- 2.3.1 On shrinkable clay soil, tree growth can lead to the differential movement of structures as moisture is removed from the soil during the growing season. Soils must be carefully assessed, and any foundations must be installed following the recommendations of National House Building Council (NHBC) Standards Chapter 4.2: Building Near Trees (2025) to avoid potential future damage. Where trees which predate existing structures are to be removed, this can result in heave as the soils are re-wet.

- 2.3.2 The advice of a suitably qualified engineer must be obtained to inform any potential issue of heave. Specific advice in relation to this issue is beyond the scope of this report.

2.4 Above Ground Constraints

- 2.4.1 Tree stems and branches can restrict available space on a site. Damage or wounding (including excessive pruning) can significantly reduce the amenity contribution of the tree and may lead to the development of dysfunction and decay, with significant long-term implications for tree health. The future impact of existing trees should be carefully considered, including individual species characteristics (such as potential future size, fruit fall, shade etc.) and how the tree will interact with any proposed development and future land use. Annual tree growth can lead to direct damage if stems/branches (or roots) come into physical contact with structures and this must also be taken into consideration.

2.5 Trees and Risk in the Context of Development

- 2.5.1 Tree owners/managers have a legal duty to prevent foreseeable harm. It is generally accepted that this duty can be fulfilled by undertaking proactive inspections of significant trees to identify obvious defects and by taking appropriate remedial action or gaining further advice as appropriate.
- 2.5.2 Further guidance is available from the National Tree Safety Group.
- 2.5.3 The tree survey carried out as the basis of this report is primarily for planning purposes, focusing on the quality and benefits of the trees and is not specifically designed to assess the safety of trees on the Site. However, when obvious issues have been identified, recommendations have been included in the Tree Survey Schedule.
- 2.5.4 The Construction (Design and Management) Regulations (2015) states that developers and contractors have responsibilities for health and safety as a result of their actions. Should trees be left in an unstable or hazardous condition the Health and Safety Executive (HSE) could seek to prosecute those responsible along with the potential for further Civil claims for damages.

2.6 Trees and Wildlife

- 2.6.1 Full consideration must be given to the presence of species protected under the Wildlife and Countryside Act (1981 - as amended), the Countryside Rights of Way Act (2000) and the Conservation of Habitats and Species Regulations (2017), in particular the presence of bats and nesting birds. It is recommended that wherever possible, significant tree/hedge works take place outside of the typical bird nesting season of March to September. The advice of a suitably qualified Ecologist is recommended in relation to any potential impacts on protected species.

2.7 Tree Works

- 2.7.1 Any tree surgery recommendations contained within this report are to be undertaken in accordance with BS3998:2010 Tree work – Recommendations (BS3998:2010) by suitably qualified and insured contractors. Significant pruning works are best undertaken when trees are dormant or outside periods of high functional activity to reduce the overall impact on energy available to the tree for growth and processes. In general, the optimum period for works is between November to February and July to August (subject to the presence of protected species) when the tree is less active and better placed to respond to wounding and a reduction in leaf area.

3. Field Work Observations

3.1 The Site

- 3.1.1 The Site boundary is shown on the TCP included within Appendix A of this report.
- 3.1.2 The Site is located at Flaxlands Farm, Wootton Bassett in Wiltshire, and includes a number of agricultural land parcels which are currently used for grazing livestock, and arable land. There are a number of woodland areas which border the Site, including Morris's Copse, Frith Copse, Cowleaze Copse and Flaxlands Wood. The Site is bordered predominantly by agricultural land.
- 3.1.3 Flaxlands Lane is a country backroad that transects the two main sections of the Site and is partially included within the Site boundary. There are a number of residential dwellings, farmsteads and a church along this lane. There are a number of public rights of way which connect the Site to the wider area. Beyond land bordering the Site are a number of small villages, or hamlets, including Hook and Greatfield to the east, and Lydiard Plain and Green Hill to the north.
- 3.1.4 The M4 motorway is beyond the Site to the south, with Royal Wootton Bassett beyond this, which is the nearest significant town.

3.2 The Trees

- 3.2.1 In total, 497 tree features were identified during the walkover survey, formed of 386 individual trees, nine woodlands, 45 tree groups and 57 hedgerows.
- 3.2.2 Of these identified tree features, 128 tree features of high quality (Category A), 201 tree features of moderate quality (Category B), 95 tree features of low quality (Category C), and the remaining 73 trees as unsuitable for retention in the current context of the Site for more than a 10 year period (Category U).
- 3.2.3 Table 2 below summarises the number of trees in each quality category recorded within or adjacent to the Site.

Table 2: Summary of tree features in each quality category (as defined by BS5837:2012)

Quality Category	A	B	C	U
Number of tree features	128	201	95	73

- 3.2.4 The trees on the Site range between young and ancient life stages and are predominantly early mature (with an approximate life stage distribution shown as Figure 1 below) and are mostly in a good physiological and structural condition.

Note: This graph only shows value totals for individual trees ('T' features)

Life Stage Percentage

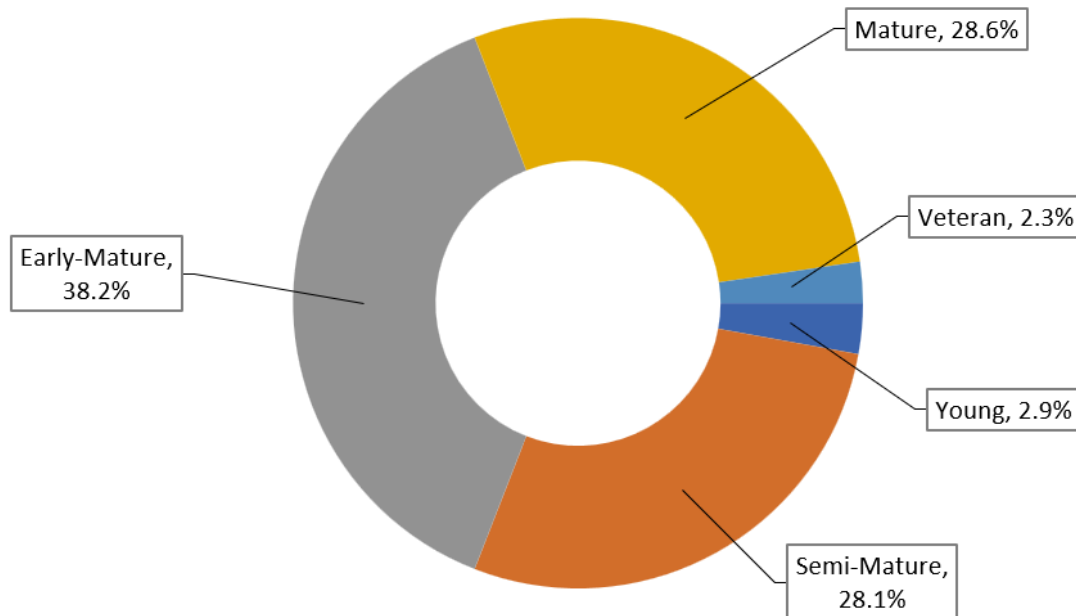


Figure 1: Approximate age distribution for individually surveyed trees.

- 3.2.5 The most significant trees identified during the survey are T117, T153, T249, T294, T295, T366, T379, T386 and T416 which were identified as veteran during the walkover tree survey due to containing discernible veteran characteristics (such as large amounts of deadwood, extensive decay, fungal colonisation and previous major limb failures). Furthermore, tree features G4 and G6 also contained specimens which were identified as ancient due to having a large stem diameter for the species.
- 3.2.6 The Site contains numerous early mature and mature oak trees which were recorded as Category A; they collectively provide good landscape value.
- 3.2.7 Tree species identified on and immediately adjacent to the Site are shown in Table 3, below.
- 3.2.8 Figure 2, below, shows the distribution of individually surveyed tree species on and immediately adjacent to the Site. Species forming less than five percent of the surveyed tree population are included as 'other'. The species distribution highlights the dominance of oak. Due to relatively poor species diversity and the dominance of oak (and the associated risks of species specific pests and diseases such as acute/chronic oak decline and sudden oak death), the Site is therefore at risk from a loss of canopy cover. It is generally accepted that a single species should form no more than 10% of an urban forest population, due to the potential risk to canopy cover should that species be lost (due to climate change, pests and diseases etc). The development proposals therefore represent a significant opportunity to increase the tree species diversity on the Site through new and replacement planting (discussed further in Section 5.7).

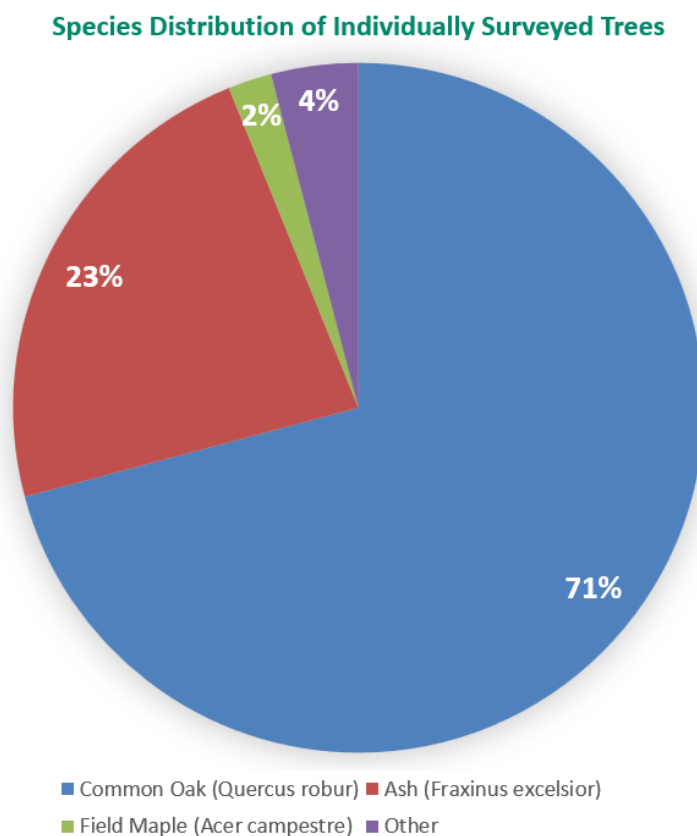


Figure 2: Summary of species of individually surveyed trees.

- 3.2.9 Where risks are acceptable the retention of dead and dying trees can provide important habitat for biodiversity. Where trees are to be removed, retaining arisings in situ as deadwood habitat is recommended where feasible. The UK Forest Standard (2023) recommends a target of 20-30m³ of deadwood per hectare as a deadwood target for woodland management.

Table 3: List of species identified during the tree survey.

Species Common Name (<i>Scientific name</i>)	Species Common Name (<i>Scientific name</i>)
Alder (<i>Alnus sp</i>)	Goat willow (<i>Salix caprea</i>)
Apple (<i>Malus sp</i>)	Grey willow (<i>Salix cinerea</i>)
Ash (<i>Fraxinus excelsior</i>)	Hawthorn (<i>Crataegus monogyna</i>)
Blackthorn (<i>Prunus spinosa</i>)	Hazel (<i>Corylus avellana</i>)
Cherry plum (<i>Prunus cerasifera</i>)	Japanese larch (<i>Larix kaempferi</i>)
Cherry (<i>Prunus sp</i>)	Lime (<i>Tilia sp</i>)
Common oak (<i>Quercus robur</i>)	Silver birch (<i>Betula pendula</i>)
Cypress (<i>Chamaecyparis sp</i>)	Small-leaved lime (<i>Tilia cordata</i>)
Dogwood (<i>Cornus sanguinea</i>)	Spindle (<i>Euonymus europaeus</i>)
Elder (<i>Sambucus nigra</i>)	Spruce (<i>Picea sp</i>)
Elm (<i>Ulmus sp</i>)	Sycamore (<i>Acer pseudoplatanus</i>)
English elm (<i>Ulmus procera</i>)	White willow (<i>Salix alba</i>)
Field maple (<i>Acer campestre</i>)	Yew (<i>Taxus baccata</i>)

3.3 Statutory and Non-Statutory Designations

Statutory Designations

- 3.3.1 AECOM checked the Wiltshire Council Planning Explorer⁵ on 14th March 2025 and an area Tree Preservation Order (TPO) was identified (TPO ref: N/TPO176). It is thought to correlate with a number of surveyed tree features to the northwest of the Site and includes Flaxlands Wood. The shape file provided online by Wiltshire Council has been shown on the TCP (Appendix A) and tree features which are likely to be included have been collated in Table 4 below. No Conservation Areas were identified that could include trees within or adjacent to the Site. Prior to any tree works, the status of tree features should be confirmed with Wiltshire Council as appropriate, due to potential inaccuracies with online mapping, and the nature of plotting tree features indicatively.

Table 4: Summary of tree features included within a TPO designation.

TPO Reference	Tree features thought to correlate with TPO
N/TPO176	H34, T37, T41, T43, T50, T52, T55, T57, T58, T59, T66, T69, T70, T73, T75, T77, T86, T87, T88, T89, T90, T91, T92, T93, T94, T95, T98, T99, T100, T101, T102, T103, T105, T107, T108, T109, T110, T111, T114, T115, W116, T117, T118, T119, T122, T123, T124, T125, T126, T127, T128, T129, T130, T131, T132, T133, T134, T135, T136, T137, T138, T139, T140, T141, T142, T143, T144, T145, T146, T147, T148, T149, T150, T151, T153, T175, T176, T177, T178, T179, T180, T181, T182, T183, T184, T185, T186, T187, T188, T189, T190, T191, T192, T193, T194, T195, T196, T197, T198, W201 (southern edge), G203, T206, T207, T208, T209, T211, T212, T213, T215, T216 and T217

- 3.3.2 AECOM checked Magic Map⁶ on 14th March 2025 for the presence of any Sites of Special Scientific Interest (SSSI) and none were found within or immediately adjacent to the Site.
- 3.3.3 A felling licence may be required by the Forestry Commission to fell more than 5m³ in any calendar quarter (subject to relevant exceptions such as 'necessary' works by statutory undertakers, works required to fulfil an act of parliament, works to trees in gardens, designated public open spaces or churchyards).

⁵ [Wiltshire Planning Explorer | Wiltshire Council | \(arcgis.com\)](https://www.wiltshire.gov.uk/planning-explorer)

⁶ [Magic Map | DEFRA | \(magic.defra.gov.uk\)](https://magic.defra.gov.uk/)

- 3.3.4 Full planning consent is an exemption from the need to apply for consent for works to trees protected by a Tree Preservation Order, the need to give notice of the intention to undertake works within a Conservation Area and the need to apply for a Felling Licence with the Forestry Commission (to fell more than 5m³ per calendar quarter where no more than 2m³ are sold). A new TPO can be made by the LPA at any time. Prior to any tree works the status of trees to be removed or pruned must be verified with Wiltshire Council and the Forestry Commission as appropriate.

Non-Statutory Designations

- 3.3.5 AECOM checked Magic Map on 14th March 2025 for the presence of any non-statutory designations relating to trees such as Ancient Woodland or Deciduous Woodland (included within the Priority Habitat Inventory) and there were several Deciduous Woodland and Ancient Woodland (Semi Natural and Replanted) designations adjacent to the Site. These are shown on the TCP (included as Appendix A), including a minimum notional 15m buffer zone beyond ancient woodland features as per standing advice from the Forestry Commission and Natural England (2022).
- 3.3.6 AECOM also checked the Woodland Trust Ancient Tree Inventory⁷ for the presence of any recorded notable, veteran or ancient trees within or immediately adjacent to the Site and none were identified. However, the walkover survey identified a number of trees (T117, T153, T249, T294, T295, T366, T379, T386 and T416) as veteran, and G4 and G6 contained specimens which were identified as ancient due to having a large stem diameter for the species.
- 3.3.7 Ancient Woodland as well as veteran and ancient trees form irreplaceable habitat, which are afforded a high priority in the planning process. Damage or loss of these features should not be permitted unless there are *'wholly exceptional reasons and a suitable compensation strategy exists'* in accordance with the NPPF (2024).

⁷ [ATI | Woodland Trust | \(ati.woodlandtrust.org.uk\)](https://ati.woodlandtrust.org.uk)

4. The Proposed Development

- 4.1.1 The Proposed Development is detailed on the TPP included as Appendix C.
- 4.1.2 The Proposed Development would comprise a solar photovoltaic (PV) array with an installed capacity of up to 49.9MW and 49.9MW of battery energy storage systems (BESS) within an area of approximately 87.09ha.
- 4.1.3 The main access will tie in with the existing hard surfacing of Flaxlands Lane. Several internal access roads and peripheral access tracks will also be installed. It is understood that the access roads will be installed using a layer of crushed stone, and that peripheral access tracks will consist of a layer of compacted sub-soil, without a sub-base:
- **Access roads:** Aggregate surface layer (Class 1A), with aggregate sub-base (Class 6F2 or 6F5).
 - **Peripheral Access Tracks:** Roller compressed earth. Can utilise a no-dig installation as required.
- 4.1.4 The Site will be enclosed with stock proof mesh fencing approximately 1.8m in height. Access points with gates are to be installed at the access off Flaxlands Lane and elsewhere throughout the Site.
- 4.1.5 Six temporary passing places along Flaxlands Lane are also proposed in order to allow two articulated vehicles to pass each other during construction. These are understood to likely consist of protective matting (Trak Mats, or similar) pinned into position.

5. Arboricultural Impact Assessment

5.1 Purpose

- 5.1.1 This impact assessment sets out the reasonable worst case likely principal direct and indirect impacts of the Proposed Development on the tree features on or immediately adjacent to the Site. Suitable mitigation measures are recommended to allow for the successful retention of significant tree features or to compensate for trees to be removed, where appropriate.
- 5.1.2 Tree removals have been determined as a reasonable worst-case scenario. The detailed design will present an opportunity to seek to reduce and/or avoid impacts wherever possible.
- 5.1.3 A brief summary of tree features to be removed, tree works, and incursions related to the Proposed Development are detailed within the table below.

Table 5: Summary of Removals, Incursions and Pruning to Facilitate the Proposed Development

Impact	Category A	Category B	Category C	Category U
Tree features to be removed to facilitate the Proposed Development	-	-	-	T265, T266
Total	0	0	0	2 individual trees
Tree features to be removed in part to facilitate the Proposed Development	-	G63	H1, H15, H17, H62, H64, H65, H81, H96, H200, H202, H210, H258, H277, H278, H286, H287, H485, H486	-
Total	0	Part of 1 tree group	Part of 18 hedgerows	0
Tree features which may require some incursion into their RPA and/or canopy spread to allow the Proposed Development.	T50, T101, T114, T115, T267, T279, T283, T362, T380, T388, T421, T463	G6, T56, T268, T459	H258, T429, G446, H497	T259, T275
Total	12 individual trees	3 individual trees and 1 tree group	1 individual tree, 1 tree group and 2 hedgerows	2 individual trees
Tree features likely to require pruning to facilitate the Proposed Development	T50, T115, T283, T366, T380, T388, T421	T268, H285, T430	H258, T429, G446, H497	T259, T275
Total	7 individual trees	2 individual trees and 1 hedgerow	1 individual tree, 1 tree group and 2 hedgerows	2 individual trees

5.2 Trees to be Removed

- 5.2.1 In total, part of one moderate quality (Category B) tree group and part of 18 low quality (Category C) hedgerows are likely to be removed to facilitate the Proposed Development. All of these features are within the Site red line application boundary.
- 5.2.2 In addition, there are two individual trees, identified as unsuitable for retention as living trees for more than ten years in the context of the current land use (Category U), likely to require removal to facilitate the installation of the proposed temporary passing places. It is considered that these tree features would require removal regardless of any development proposals due to their poor condition and proximity to Flaxlands Lane; as such they are not considered further within this report.
- 5.2.3 These tree features require removal due to a direct conflict with the footprint of proposed access roads, temporary passing places and the associated working space requirements to install them.
- 5.2.4 Hedge and tree removals will be mitigated with a high-quality scheme of new tree planting in accordance with the Outline Landscape and Ecological Management Plan (AECOM, 2025) and Wiltshire Council

planning policy which will represent an opportunity to enhance the quality, benefits and resilience of trees on the Site.

- 5.2.5 All of the remaining recorded trees can be retained and protected.

5.3 Third Party Trees

- 5.3.1 It is understood that all surveyed tree features are the responsibility of the Applicant, with exception to those tree features requiring part removal and/or pruning along Flaxlands Lane, for which ownership remains unclear.
- 5.3.2 Prior consent must be in place before any tree works outside those permitted under established rights in common law are carried out to third party tree features and it is recommended that, where applicable, this is secured prior to the submission of any planning application.

5.4 Tree Works

- 5.4.1 Tree removals and tree pruning works to facilitate the Proposed Development are detailed in the Tree Survey Schedule (included as Appendix B).
- 5.4.2 Contact wounding to the stem and branch structures of retained trees can lead to structural instability, a reduction in vitality and a potential ingress for pests and pathogens, including wood decay fungi. This can result in premature limb or stem failure and may lead to premature tree loss where this is significant. Pruning of material to mitigate against contact wounding is therefore preferential where there is a risk of impact wounding.
- 5.4.3 Tree pruning may be required to retained trees adjacent to Flaxlands Lane. Trees established along Flaxlands Lane are likely to currently require cyclical tree pruning works to maintain statutory road clearances; pruning of these trees is therefore considered in line with the normal maintenance of these trees and is justified regardless of the Proposed Development.
- 5.4.4 Crown lifting is likely to be required to facilitate the installation of the proposed perimeter fence and access track. It is recommended prior to the commencement of site works that a site walkover is undertaken with the Site Manager, Site Arboriculturist and Wiltshire Council Tree Officer to determine the likely requirement for tree pruning to facilitate the proposals (including the total volume and extent of pruning, which will be kept to the minimum feasible).
- 5.4.5 Tree feature T115 is subject to a TPO – TPOs are discussed in Section 3.3.
- 5.4.6 Tree features T259 and T275 are to have their crowns removed and reduced to a height of 4m, creating a 'monolith'. This would be preferable to their removal, retaining a level of habitat provision whilst remaining within the safety tolerances required for the installation of the temporary passing places. This pruning is justified regardless of the Proposed Development, due to their poor condition and proximity to Flaxlands Lane.
- 5.4.7 No additional works to retained trees are considered likely to be required at this stage. All tree work is to follow the principles of *BS3998: 2010 Treework – Recommendations* and must be carried out by suitably qualified and insured contractors. The Arboricultural Association provides a list of contractors who meet these requirements which can be found at www.trees.org.uk.
- 5.4.8 Should the requirement for additional tree works be identified, this will be discussed with the Site Arboriculturist, and no works will be undertaken without the consent of the Wiltshire Council Tree Officer.

5.5 Incursions within the RPA or Canopy Spread

Background

- 5.5.1 Standard construction methodologies for proposed access provisions and fencing installation within the RPAs of retained trees is likely to require access and a level of soil disturbance. This may lead to premature tree death through the compaction of soils and the severance of roots enabling colonisation of the inner wood substrate (e.g., by wood decay fungi); a reduction of water uptake and energy storage; hydraulic dysfunction of sapwood and a potentially significant negative effect on tree stability.

- 5.5.2 Root death may result where soil levels are increased within RPAs causing a reduction in the normal exchange of soil gases, soil water and a significant increase in mechanical resistance within the soil. Furthermore, the compaction of soil from construction access within RPAs is likely to lead to root death through the aforementioned impacts.
- 5.5.3 Mitigation for tree impacts must therefore avoid, reduce and/or mitigate against the above impacts, as outlined in the subsections below.

Internal Access Tracks and Peripheral Access Tracks

- 5.5.4 The Proposed Development requires the installation of internal access tracks and peripheral access tracks, which require incursions into the RPA and/or canopy spread of T50 and T279. These works will also require canopy incursion within the canopy spread of T268, and T429.
- 5.5.5 However, it is understood that the access roads will tie in with the existing hard surfacing of Flaxlands Lane outside of the RPA of T279, and T429, and therefore there will be no negative impact to these tree features.
- 5.5.6 To the west of the Site, the existing access to Flaxlands Farm requires widening. This is proposed within the buffer zone of an area designated as Ancient Semi Natural Woodland (ASNW). However, the buffer zone has previously been altered in this area – with Flaxlands Lane transecting the buffer zone, and the existing access track to Flaxlands Farm entering from this point too. Therefore, the works will be across the road from the ASNW and are not considered to have the potential to negatively impact the ASNW buffer zone. Therefore, these works represent no significant change within the ASNW buffer zone from the current use of the Site. Furthermore, the RPAs of trees within the ASNW and the buffer zone, will not be impacted.
- 5.5.7 Any plant/machinery utilised to aid with the installation of internal access tracks must be positioned outside of unprotected areas of soft ground within the RPA of retained trees; a banksman must be used where long reach plant is operating within 5m of any part of a retained tree to prevent physical damage to tree stems and branches.
- 5.5.8 All access within unprotected areas of soft ground within RPAs must adhere to the ground protection principles stated in Appendix D.2.
- 5.5.9 These works are not considered likely to have a significant negative impact on the condition of T50 where its rooting area can be protected as fully as possible, and the canopy of T268 can be pruned to prevent undesirable tree damage. Tree pruning works are discussed in Section 5.4.
- 5.5.10 Furthermore, within the RPA of T50, the existing field access gap between hedgerow features H81 and H214 will be utilised, which does not represent a significant change from the current use of this area of the Site. All works within RPAs must be supervised by the Site Arboriculturist.

Perimeter Fencing

- 5.5.11 The Proposed Development requires the installation of a perimeter fence, which requires incursion within the RPA and/or canopy spread of T56, T101, T114, T115, T267, T366, T388 and T421.
- 5.5.12 Tree pruning works are likely to be required to facilitate the installation of the perimeter fence, as discussed in Section 5.4.
- 5.5.13 It is not clear at this stage in the design whether fence posts will be driven or if they will require footings. It is understood that fencing will comprise of posts and wire mesh (stock fencing); posts will be installed at a depth of approximately 700mm below ground level (subject to geotechnical reporting).
- 5.5.14 Where footings are required for perimeter fencing within RPAs, they must be excavated carefully by hand (potentially using compressed air and/or soil vacuums) and carefully sited to avoid significant tree roots or bundles of roots (>25mm in diameter). Any exposed roots should be dealt with adhering to the principles stated in Appendix D.3. Footings must be lined with impermeable sheeting that will prevent leachate from wet concrete contaminating surrounding soil.
- 5.5.15 Where posts will be driven within the RPA of retained trees, they should be carefully sited to avoid any significant tree roots or bundles of roots (>25mm in diameter) that may be present, and they must be driven by hand (with use of hand tools only) - a machine mounted post driver is not considered suitable for use within RPAs or canopy spreads due to the greater likelihood of impact damage to crowns and soil compaction from heavy machinery, unless otherwise agreed with an arboriculturist.

- 5.5.16 Pedestrian only access will be permitted for these works within RPAs. Suitable fit for purpose ground protection will be required in accordance with the principles stated in Appendix D.2.
- 5.5.17 These works should be supervised by an arboriculturist.
- 5.5.18 These works are not likely to have a negative impact on the structural and physiological condition of retained trees where the principles stated above can be adhered to, to protect tree roots and the soil as fully as possible. Furthermore, the level of incursion required for T267, T366 and T421 is limited to the extreme outer RPA. The installation of perimeter fencing will also prevent heavy agricultural vehicles and machinery from entering unprotected areas of soft ground within RPAs which represents a positive change from the current use of the Site.
- 5.5.19 Tree features T101, T114 and T115 are subject to a TPO, and where there is a likelihood of interference with tree roots due to the installation of proposed perimeter fencing, these works should be agreed with the Wiltshire Council Tree Officer at the earliest possible stage. Tree Preservation Orders are discussed further in Section 3.3.

Temporary Passing Places

- 5.5.20 The Proposed Development requires a number of temporary passing places to be introduced along Flaxlands Lane to facilitate the passing of two heavy goods vehicles (HGVs).
- 5.5.21 The final construction specification and locations of the temporary passing places will be established at a later stage, and subject to liaison with Wiltshire Council's Highways Department and Tree Officer, which will further seek to reduce and avoid tree related impact. It is understood that the temporary passing places will not require a standard full depth construction. They will likely utilise a protective mat (such as Trak Mats or similar) pinned in position on areas of unmade soft ground (verges) adjacent to the existing hard surfacing of Flaxlands Lane.
- 5.5.22 The temporary passing places are likely to require RPA incursions for T259, T275, T283, G446, H486 and H497.
- 5.5.23 Prior to the installation of temporary passing places, a vegetative scrape will likely be required to remove the upper layer (<50mm) of organic matter within RPAs to prevent potentially damaging anaerobic conditions occurring beneath the proposed temporary surface. This must be carried out carefully by hand within the RPA of retained trees. Machinery positioned on the hard surfacing of Flaxlands Lane may be utilised to assist with the transport of spoil. Any spoil from these works must be stored outside of the RPA of retained trees, or on suitable fit for purpose ground protection where within RPAs, in accordance with the principles highlighted in Appendix D.2. Any roots uncovered during these works must be dealt with in accordance with the principles stated in Appendix D.3.
- 5.5.24 Upon decommissioning of the temporary passing places, the soil must be restored to its previous state. A layer of high quality topsoil, equivalent to that removed (<50mm) will likely be required.
- 5.5.25 These works must be supervised by an arboriculturist.
- 5.5.26 These works are not likely to have a significant negative impact on the structural and physiological condition of retained trees due to the minor level of incursion required and where the principles stated above can be adhered to (protecting tree roots and their soil environment as fully as possible). Furthermore, the provision of temporary passing places will be preferable to their absence, as it is considered less likely for traffic to utilise areas of unprotected soft ground (verges), providing protection against compaction and rutting of the ground.

Construction Facilitation Access

- 5.5.27 The Proposed Development will likely require construction facilitation access within the RPA of a number of retained tree features (including the extreme outer RPA of G6, which contains trees identified as likely ancient). As a worst case scenario, a buffer zone of 1m has been applied beyond the footprint of all permanent proposals (excluding temporary passing places, which can be installed from Flaxlands Lane to minimise tree related impact) to account for this.
- 5.5.28 In general, all access required to facilitate the Proposed Development will adhere to the principles stated in Appendix D.2 and therefore is not considered likely to have a negative impact on the health or structural condition of retained trees where the soil environment within RPAs can be protected as fully as possible.

5.6 New Services within RPAs

- 5.6.1 Limited information in relation to services has been made available at this stage.
- 5.6.2 Standard construction methodologies for the installation of new or diverted services within the RPAs of retained trees are likely to require significant excavation. This may lead to premature tree death or decline through the severance of roots enabling colonisation of the inner wood substrate (e.g., by wood decay fungi); a reduction of water uptake and energy storage; hydraulic dysfunction of sapwood and a potentially significant negative effect on tree stability.
- 5.6.3 The default position is that all new services be located outside of RPAs of retained trees.
- 5.6.4 Where this is not feasible, the use of two techniques are suggested. In order of priority, these are:
1. The use of trenchless techniques (such as impact moling) to cross underneath any RPA, with the top of the tunnel positioned at least 2m below ground level and entry and retrieval pits sited outside of the RPAs; or
 2. Hand dig excavation methodologies, utilising compressed air and a soil vacuum, or hand tools, to carefully excavate within an RPA, retaining and protecting any significant roots (>25mm in diameter) encountered. (Noting that this technique is less likely to be applicable for services that lack flexibility and cannot be installed around any significant roots encountered, e.g., precast concrete).
- 5.6.5 Where possible, consideration for the bundling of services should be made to avoid multiple excavations.
- 5.6.6 Existing services can be winched out from a manhole/chamber located outside of an RPA and redundant pipework can be decommissioned using pipe bursting techniques to avoid excavation which could damage roots.
- 5.6.7 These operations typically require a detailed arboricultural method statement to set out in detail how they can be successfully achieved. All works within RPAs must be supervised by the Site Arboriculturist.
- 5.6.8 It is widely acknowledged that trees are unable to break into drains/services. Rather, trees exploit weaknesses already present, such as faulty or weak rubber seals on pipeline joints. Utilities should be designed and installed to resist entry by tree roots. Where a survey identifies roots within services, roots may typically be cut out with the identified fault ameliorated. Where significant roots are at risk of severance the advice of the Site Arboriculturist must be obtained.
- 5.6.9 Infrastructure connected to services (e.g., lighting columns or security cameras), should be positioned at appropriate distances to retained or newly planted trees to avoid onerous and damaging tree works. Carefully located low diameter footings (such as driven posts, screw piles or equivalent, positioned following trial hole excavations) can help avoid impacts to roots.

5.7 Tree Planting

- 5.7.1 Existing areas of unsurfaced ground must be protected during the construction phase if they are to be re-used for new plantings. Protection can be achieved using fit for purpose ground protection measures as set out in BS5837:2012 Section 6.2.3 or by creating a fenced exclusion zone. Where protection is not feasible, soil amelioration or replacement works will be required to ensure suitable growing conditions for new trees to fully establish.
- 5.7.2 Where new trees are to be planted, the minimum planting distances detailed in Table A.1 of BS5837:2012 must be adhered to along with project specific offsets to prevent direct damage to services and structures from future tree growth.
- 5.7.3 New tree planting should be implemented in accordance with the guidance set out in BS8545:2014 Trees: from nursery to establishment in the landscape – Recommendations.
- 5.7.4 The UK Forest Standard (2023) recommends that no more than 65% of a forest management unit area is allocated to a single species, with a minimum of 5% native broadleaved trees or shrubs, 10% of other tree species and 10% open ground, or ground managed for biodiversity as the primary objective is utilised for new tree planting.

- 5.7.5 A summary of the existing individually surveyed tree population on the Site is included in Section 3.2 and this should inform any new planting proposals. Tree planting proposals can be found in the Outline Landscape and Ecological Management Plan (AECOM, 2025).

5.8 Tree Protection

- 5.8.1 Retained trees are vulnerable to damage from construction activities which can include physical damage to stems and branches following impacts with plant, root severance following trenching, root death or dysfunction following damage to soil structure (caused by the movement of people or machinery on unsurfaced ground) or via the spillage of materials toxic to tree health. The default position is that the RPA and canopy spread of trees to be retained will form an effective Construction Exclusion Zone, secured with robust fencing where no access will be permitted. Where access is necessary within this area special measures such as the use of ground protection and arboricultural supervision are generally required.
- 5.8.2 Outline tree protection measures are considered in Appendix D of this report. An Arboricultural Method Statement is often required as a condition of planning consent to set out the phasing of site operations, the finalised tree protection measures for the Site and to provide detail on how sensitive elements of work are to be achieved in proximity to retained trees. Issues to be addressed by the Method Statement are listed in the Conclusion of this report.

5.9 Site Organisation, Storage and Use of Materials, Plant and Machinery.

- 5.9.1 All construction site facilities including site huts, staff and contractor parking and areas for storage will be located outside of the RPA or crown spread of retained trees, including those not specifically covered in this report. Space is likely to be constrained on the Site and will need to be carefully considered. The Construction Exclusion Zones identified on the TPP must be fully respected and their location and significance is to be highlighted to all site staff and contractors during the formal site briefing.
- 5.9.2 The use, mixing and washing of materials can lead to run off or inadvertent spillage into tree root zones. Many substances often used on construction sites can be toxic to tree roots (such as concrete, fuels, salts, builders' sand and herbicides) and can result in the death of tree roots and beneficial soil organisms and can have a significant impact on the future health and appearance of the tree.
- 5.9.3 The storage of materials and arising's can result in an effective raised soil level. This buries tree roots at depths where air and water are less available and can lead to the decline or death of the tree.
- 5.9.4 For these reasons the storage of materials and any washing, mixing or refuelling will take place in agreed allocated areas at least 5m from the edge of the RPA of retained trees.
- 5.9.5 Any slope effect must be taken into account and where there is a potential for run off, heavy duty polythene sheeting and sandbags must be in place as bunding to prevent toxic materials reaching RPAs.
- 5.9.6 Particular care is required where high sided vehicles, long reach machinery and plant with jibs, booms and counterweights are to operate with in proximity to retained trees. A banksman will be used where the movement of plant or long reach machinery occurs within 5m of any part of a retained tree to ensure no damage is sustained.

6. The Future Impact of Trees

6.1 Background

- 6.1.1 The impact of retained trees in conjunction with the proposed future use of the Site has been considered. The key issues between existing trees on the Site and the proposed future use are considered below.

6.2 Tree Growth

- 6.2.1 Trees and groups to be retained have been afforded suitable space to ensure they remain viable in the long term. Trees which are currently not fully grown will increase in size and this has been considered in conjunction with the Proposed Development and future use of the Site. This is especially relevant for all young to semi mature trees, which form approximately one quarter of the surveyed tree population.
- 6.2.2 The PV Solar Panels have been positioned so that canopies are unlikely to directly overhang them in the future. Any trees which develop canopies which overhang structures in the future (such as retained trees adjacent to the proposed perimeter fence) can be pruned back on an ad hoc basis as required, and this will not represent a substantial change from the current tree management requirements for the Site.

6.3 Shade

- 6.3.1 Shading arcs equivalent to tree height and formed of a radius from northwest to due east have been plotted on the TCP. Shading arcs show the typical extent of likely shading from trees throughout the day (as the sun moves from east to west in a southerly orientation) but do not illustrate areas subject to constant shade.
- 6.3.2 Estimated mature shading arcs based on data from the NHBC (2025) have been plotted for individually surveyed tree features and these are represented by magenta lines on the plans. Trees which are identified as unsuitable for retention as living trees for more than 10 years in the context of the current land use (Category U) have been excluded from this assessment.
- 6.3.3 Trees located to the south and west of solar panels are likely to cast the greatest degree of shade. Shading impacts are likely only subject to partial day shading; shade impacts are typically on one side of a tree only (as the sun tracks across the sky) and therefore will be limited to specific times of day only. Shading from deciduous trees will be reduced in winter (when the sun is lowest in the sky and the extent of shade is greatest) following leaf fall. The trees on Site which are projected to cast the greatest degree of shade in maturity (as shown on the TCP and TPP, included as Appendix A and C, respectively) are predominantly deciduous species which will lose their leaves in winter. Furthermore, the lifespan of the Proposed Development (up to 40 years) means it is likely that there will be trees (especially oak trees, which form approximately 71% of the surveyed tree population) that have not reached their maximum mature size by the time it is decommissioned.
- 6.3.4 On this basis, and due to the location of retained trees, shade from retained trees immediately following construction and during the operation of the Proposed Development is not likely to result in significant conflict or future pressure to fell or undertake extensive pruning of retained trees.

6.4 Future Land Use and Tree Management

- 6.4.1 Retained trees will require periodic inspection to assess their structural condition and safety. Occasional removal of dead wood or other remedial works to address significant defects may be required in areas of frequent access. This is unlikely to be overly onerous and will be the responsibility of the tree owner.
- 6.4.2 All tree works recommended in the Tree Survey Schedule (Appendix B) as a result of the preliminary tree surveys considered trees in the context of the present use of the Site (i.e., prior to development proposals). Where these works are not superseded by proposed tree removal, they should be actioned.
- 6.4.3 Tree management is not considered to be a significant constraint to developing the Site. However, the Site includes many large trees of varying condition and where the land use is subject to change, tree condition and the requirement for remedial works or exclusion zones must be reviewed with further advice from an arboriculturist obtained as appropriate.

- 6.4.4 During the construction and operation of the Proposed Development, all staff operating on the Site are to be made aware of the need to look out for obvious signs of tree defects and to report them to the Site Manager who will seek further advice as necessary.
- 6.4.5 The land within the Site is currently generally managed for agricultural use which includes the movement of machinery, grazing livestock, and likely the use of pesticides and fertilisers, which can all have a negative impact on tree health. Trees are also not generally subject to formal protection (beyond those protections afforded by The Forestry Act, 1967) and could typically be removed or pruned by the current landowners and managers at any time. The Proposed Development will afford retained trees robust protection from loss or potentially damaging activities which will represent an improvement in the secure growing conditions provided.

7. Conclusion

7.1 Summary

- 7.1.1 In total, part of one moderate quality (Category B) tree group and part of 18 low quality (Category C) hedgerows are likely to be removed to facilitate the Proposed Development. All of these features are within the Site red line application boundary.
- 7.1.2 In addition, there are two individual trees, identified as unsuitable for retention as living trees for more than ten years in the context of the current land use (Category U), likely to require removal to facilitate the Proposed Development. The removal of these trees is justified regardless of any development proposals due to their poor condition and proximity to Flaxlands Lane.
- 7.1.3 Tree removals are required due to a direct conflict with the footprint of proposed access roads, temporary passing places and the associated working space requirements to install these features.
- 7.1.4 It is understood that all surveyed tree features are the responsibility of the Applicant, with exception to those tree features requiring works along Flaxlands Lane, for which ownership remains unclear. Prior consent must be in place before any tree works outside those permitted under established rights in common law are carried out to third party tree features and it is recommended that, where applicable, this is secured prior to the submission of any planning application.
- 7.1.5 Hedge and tree removals should be mitigated with a high-quality scheme of new tree planting in accordance with the Outline Landscape and Ecological Management Plan (AECOM, 2025) and Wiltshire Council planning policy which will represent an opportunity to enhance the quality, benefits and resilience of trees on the Site.
- 7.1.6 Tree pruning is likely to be required for retained trees adjacent to the proposed passing places and proposed perimeter fencing. The level of pruning that will be required is considered likely to be minor and will be agreed on site, therefore it will not likely have a long term negative impact on the trees.
- 7.1.7 Furthermore, statutory crown lifting may be required for retained trees along Flaxlands Lane, although this is justified regardless of the Proposed Development and has not been considered in this report.
- 7.1.8 Prior to the commencement of site works a site walkover will be undertaken with the Site Manager, Site Arboriculturist and Wiltshire Council Tree Officer to determine the likely requirement for tree pruning to facilitate the proposals (including the total volume and extent of pruning).
- 7.1.9 The Proposed Development requires incursion in the RPA and/or canopy spread of 18 individual trees, two tree groups and two hedgerows to facilitate the proposed access roads, passing places and perimeter fencing. They will be managed by utilising specialist and careful working methods and will not likely have a detrimental impact on tree health or condition.
- 7.1.10 All works within RPAs must be supervised by the Site Arboriculturist.
- 7.1.11 Soil structure for areas of new tree planting where the ground is currently unsurfaced will either be protected using ground protection or fenced exclusion zones; or the soil structure will be ameliorated or replaced following the completion of construction works on the Site.

7.2 Issues to be addressed by an Arboricultural Method Statement:

- Conditions of planning consent;
- Pre commencement meeting and site briefing;
- Order and phasing of operations;
- Tree works;
- Tree protection fencing;
- Ground protection;
- Site storage and facilities;
- Movement of people, plant and materials;
- Enabling works;
- Installation of new perimeter fencing;

- Installation of access roads and peripheral access roads;
- Installation of passing places; and
- Removal of tree protection measures

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