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Oliver Phippen
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BY EMAIL ONLY

Dear Mr Phippen,

Planning consultation: The construction and operation (including maintenance) of a 49.9MW solar farm to include ground mounted solar photovoltaic (PV) arrays, electrical substations, grid balancing infrastructure, cabling, BESS (49.9MW capacity), communications tower, other associated infrastructure and areas for biodiversity net gain (BNG) enhancement and landscape mitigation

Location: Land at Flaxlands Farm, Royal Wootton Bassett, Swindon, SN4 8DY

Thank you for your consultation on the above dated 08 August 2025.

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.

Priority Habitat and Flaxlands Manor County Wildlife Site (CWS)

The development site includes the Flaxlands Manor County Wildlife Site (CWS). The CWS has been recognised for its species rich grassland habitats, part of which have been demonstrated by detailed survey completed in support of the application to be of sufficient quality to qualify as Lowland Meadows Priority Habitat while parts of the CWS are mapped as Calcareous Grassland Priority Habitat. Much of the remainder of the CWS is mapped as "Good quality semi-improved grassland". Although the areas of Good quality semi-improved grassland are of lower quality than Priority Habitats they nevertheless have considerable conservation value, particularly where they are adjoining remaining areas of Priority Habitat and ancient woodland as is the case here. Good quality semi-improved grasslands also provide important opportunities for restoration to Priority Habitat. The total combined area of mapped Priority Habitat and Good quality semi-improved grassland both within the CWS and on adjacent land is approximately 34 hectares, representing a significant block of continuous grassland habitats that together will form an area of considerable ecological importance. Our records suggest the CWS and adjacent good quality grassland are included in a current Higher Level Stewardship Scheme, which is also indicative that the land is considered to be of substantive biodiversity value. The submitted ES makes no reference to the current HLS agreement.

Within the submitted ES much of this land is classified as "other neutral grassland" with an explanatory note that states, "Though this habitat is likely to be relatively common in the wider landscape, it is relatively species-rich due to the lack of recent intense grazing". In fact, lowland meadow habitat / Good quality semi-improved grasslands are not common in the wider landscape as is evident from the habitat mapping available. Further, the lack of recent intense grazing will not have increased species richness, rather it will have increased the likelihood of the botanical surveyors noticing species present in the sward. Other than the fields recognised as supporting Lowland Grassland Priority Habitat no further detailed information is provided on the botanical quality of the grassland's affected by the scheme. Further, no detailed baseline botanical surveys have been submitted for the areas proposed

for restoration of habitats for Biodiversity Net Gain (BNG), which includes significant parts of the CWS that are mapped as either Lowland Calcareous Grassland Priority Habitat or Good quality semi-improved grassland. Based on the current information it is therefore not possible to determine with any confidence the actual quality of the grassland affected by panels, its contribution to the value of the CWS, or its potential for further restoration to Priority Lowland Meadow or Calcareous Grassland Habitats. Further, without appropriate botanical assessment there is little confidence in the baseline established for the purposes of the Biodiversity Net Gain assessment.

Species rich lowland meadows are now rare in the UK with most examples surviving as isolated fragmented small stands. The Flaxlands Manor CWS and adjacent high-quality grasslands at c34 ha represent a significant block of remaining permanent grassland including land mapped as Lowland Meadow Priority Habitat, Lowland Calcareous Grassland Priority Habitat and fields supporting stands of Good quality semi-improved grassland. The current scheme layout therefore has the potential to cause significant harm to existing biodiversity interests.

Further information is needed on the quality of the grassland recognised as a CWS along with any additional areas mapped as Good quality semi-improved grassland. Natural England advises this should include the information held for the CWS by the Wiltshire and Swindon Biological Records Centre (WSBRC) (e.g. habitat description, monitoring data and or species lists). The scheme should also submit the species lists completed during the field surveys of the application site for the CWS and areas mapped as Good quality semi-improved grassland, including an indication of relative abundance within the sward (eg using DAFOR). Clarification should also be provided on the management afforded to the areas included in the Higher Level Stewardship scheme covering the site and the potential for the HLS scheme to achieve a further restoration of the lowland meadow and calcareous grassland habitats affected by the scheme. Natural England should be consulted again when this information is available.

In determining the application your Authority should be mindful of National Planning Policy Framework paragraph (NPPF) 193 a) which states, "If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused". In this case avoiding harm to the grassland interests would require the relocation of panels from fields found to support both Priority Habitats as well as from adjacent grasslands of sufficient quality to be considered as Good quality semi-improved grassland.

The local planning authority should also consider the impacts of the proposed development on Flaxlands Manor CWS, in light of paragraphs 187, 188 and 192 of the NPPF and the Wiltshire Core Strategy Policy 50: Biodiversity and Geodiversity. Core Policy 50 requires developments to demonstrate protection of biodiversity through the retention, buffering and management of features suitable for nature conservation **to maintain ecological value, connectivity and functionality**. The proposals should therefore be required to demonstrate that the integrity of the CWS and any adjacent areas of species rich grassland is secured along with appropriate management necessary to maintain the CWS's wildlife interests throughout the operational phase of the development. The potential for the scheme to maintain the ecological value of the CWS are limited further by the removal from the restoration and enhancement elements of the scheme of the fields confirmed to support Lowland Meadows Priority Habitats. The scheme cannot therefore demonstrate that the highest quality habitats within the CWS will be maintained under appropriate management during the operation phase of the scheme. Indeed, the reduction of the area of permanent grassland available for conservation management that would result from the scheme may reduce the viability of maintaining the current management regime on the remaining excluded lowland meadows, resulting in further detrimental effects on the CWS.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications.

Key to the protection of the Ancient Woodlands affected by the scheme is the provision of suitable minimum buffers between the development and the ancient woodlands, including the area of planted ancient woodlands located in the south of Flaxlands Wood.

Protected Species – Bats

The submitted survey results demonstrate that the site is used by at least 10 bat species, including regular use by lesser horseshoe and barbastelle bats (Annex II species) as well as species considered threatened in the UK (e.g. serotine). Both lesser horseshoe and barbastelle bat are considered likely to have maternity roosts in the locality. The bat assemblage at the site is considered by the ES to be of national importance. Only 1 static bat detector was employed within the Flaxlands Manor CWS and no bat activity heatmaps have been provided. It is therefore difficult from the submitted information to determine whether particular parts of the site are favoured by foraging bats.

Mitigation of potential impacts on commuting bats.

The proposals provide for a 10m buffer against linear features such as watercourse and hedgerows, a 15m buffer against selected hedgerows considered as important commuting routes and a 30m buffer against the Morris's Copse ancient woodland. It is noteworthy that 15m buffers are proposed for hedgerows within the Flaxlands Manor CWS which indicates the importance of the existing permanent grasslands for both foraging and commuting bats. Natural England welcomes the proposed 30m buffer to the areas of ancient woodland, which should include no hardstanding, buildings or solar panels. The ancient woodland buffers should be used to create a more natural margin to the ancient woodland, including the creation of native scrub habitats that will benefit the foraging and commuting bats. While the buffers proposed will help mitigate potential negative impacts on bat commuting routes the scheme has not taken the opportunity to enhance ecological connectivity by creating wooded corridors that link the area's three ancient woodlands (Flaxland Wood, Morris's Copse and Frith's Copse). Such an approach would provide a significant ecological benefit for the scheme that would be in line with the NPPF (paragraphs 8, 77, 109, 125, 187, 188 and 193).

Mitigation of potential impacts on foraging bats

The submitted ES concludes that the proposals have the "potential to cause the degradation of 42.2 ha of grassland habitats in use by foraging bats", but then goes on to conclude "that due to inherent uncertainty, monitoring will be required to identify any adverse effect on population/activity or conservation status". The presence of solar arrays has been demonstrated to adversely impact the foraging activities of bats, with reduced activity within the solar arrays. There is therefore no reason to conclude that impacts are uncertain, rather conclusion should be that the available evidence suggests the presence of the solar arrays is likely to reduce foraging opportunities for the national important bat assemblage recorded on site. In such circumstances it is not appropriate to allow the likely adverse impact to occur prior to proposing additional offsite compensation measures. Rather, the scheme should seek to reduce impacts on foraging habitats by minimising impacts on the habitats most likely to support the bat assemblage. This should include removing panels from areas of good quality permanent grasslands, most notably within the Flaxlands Manor County Wildlife Site, while ensuring bat foraging features such as ponds, woodland and scrub are suitably buffered, connected and where possible enhanced as bat foraging habitats. Any offsite compensation measures considered necessary should be agreed prior to determination and secured by permission. A detailed bat foraging mitigation and compensation plan should therefore be agreed by your Authority to ensure adverse impacts on local bat populations are avoided.

Impacts on Skylarks

Natural England notes that six skylark territories may be lost due to the proposals. As noted above it is not appropriate to defer mitigation and compensation measures until after an adverse impact has occurred as suggested in the ES. Rather, the scheme should ensure sufficient mitigation measures are provided so as to ensure that the local skylark population is not adversely affected. This might include the provision of skylark plots in appropriate locations within the red line boundary, or on neighbouring farmland, that are maintained for the duration of the scheme. The final mitigation strategy for skylark should be agreed by your Authority's Ecology Team.

Other Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. The final protected species mitigation strategy should be agreed by your Authority's Ecology Team.

Cable Route

We note that the planning application does not include the cable route, which is to be the subject of a future application. Please note that whilst we have no objection in principle to the proposals, ecological impacts of the subsequent cable route must be considered and priority habitat must be conserved and enhanced in line with the NPPF. Please consult Natural England on the cable route application.

Lighting Strategy

Any permission should ensure construction lighting is avoided and that any necessary lighting during the operational phase avoids light spill on the key habitat receptors including buffers. If any lighting is required then a lighting strategy for the scheme should be agreed by your Authority prior to the commencement of the scheme.

Landscape and Ecological Management Plan (LEMP)

The scheme provides for the retention and enhancement of habitats the details of which will need to be set out in a LEMP, which should be agreed by your Authority prior to commencement of the scheme.

Natural England also recommends any permission apply a condition to require the site to be decommissioned and restored to an appropriate land use which retains any biodiversity benefits delivered during the scheme when planning permission expires.

Construction Environmental Management Plan (CEMP)

A CEMP for the scheme to avoid and mitigate effects on ecological features should be agreed by your Authority prior to commencement of the scheme. The CEMP should detail how hedgerows, trees and woodland will be protected, ensure no impacts on the quality of water courses or bodies and how dust will be controlled during construction.

Other Matters:

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](#) for further guidance.

Public Rights of Way (PRoW)

Natural England advise that Wiltshire Council's PRoW officer is fully consulted to ensure that the local network is not impacted by the proposals.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#) Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](#) glossary) is required by law to deliver a biodiversity gain of at least 10%. [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) provides more information on biodiversity net gain and includes a link to the draft [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) Planning Practice Guidance. The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](#) for more information.

As noted above the mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced.

Where on-site measures are not possible, provision off-site will need to be considered. [Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Should the developer wish to discuss any of the above with Natural England, we recommend that they seek advice through our Discretionary Advice Service.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me directly.

Yours faithfully,

John Stobart
Planning and Conservation Senior Officer
Wessex Area Team