

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell (Ecologist)
Date:	10/11/2025
Application number:	PL/2025/05830
Proposal:	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
Site address:	Land at Flaxlands Farm, Royal Wootton Bassett, Swindon, SN4 8DY
Case officer:	Oliver Phippen

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
X	Objection - further information required
	Objection in principle
	HRA completed

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Protected/priority species, ancient woodland, protected sites and priority habitat	CP50, WCA 1981, NPPF 2023, Hab. Regs.	10/11/2025 Updated ecological assessment to cover the full redline application boundary including the proposed BNG area. 10/11/2025 Ecological Mitigation and Enhancement Strategy/Plan, to include (see comments in main text): - Proposed ecological enhancements and mitigation - Suitable buffers proposed around features/habitats of importance	NO NO
2	Impacts on Flaxlands Manor County Wildlife Site (CWS)	CP50, NPPF	10/11/2025 Removal of PV arrays from CWS or evidence of no adverse impact on the CWS including (but not exclusively): - Detailed botanical survey under optimal conditions. - Update impact assessment. - Compensation strategy	NO

4	Nesting birds	NPPF 2024, CP50.	10/11/2025 A plan showing the mitigation area to be managed as a compensatory skylark nest site	NO
5	Great Crested Newt (GCN)	Habs Regs, WCA, CP50	10/11/2025 Submission of GCN DLL IACPC	NO
6	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	10/11/2025 Submission of statutory metric calculation with the correct baseline habitats, and associated plan and condition assessment sheets.	NO
7	Outline Landscape and Ecological Management Plan (Outline LEMP).	Habs Regs, NPPF, CP50	10/11/2025 Amendment of Outline Landscape and Ecological Management Plan (Outline LEMP) in response to comments.	NO
8	Construction Ecology Management Plan (CEMP)	Habs Regs, NPPF, CP50	10/11/2025 A Construction Environmental Management Plan (CEMP) must be submitted to demonstrate how construction will avoid ecological impacts and ensure compliance on site.	NO

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.

Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.

Thank you for consulting Ecology, I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- The Statutory Biodiversity Metric. 07 May 2025;
- Biodiversity Net Gain Assessment. May 2025 AECOM. Project No. 60727989;
- Ecological Impact Assessment (EcIA). May 2025. AECOM. Project No. 60727989;
- Preliminary Ecological Appraisal Report. June 2024. AECOM. Project No. 60727989;
- National Vegetation Classification Survey. August 2024. AECOM. Project No. 60727989;
- Roosting Bats Report. November 2024. AECOM. Project No. 60727989;
- Roosting Bats Report Addendum. January 2025. AECOM. Project No. 60727989;
- Bat Activity Report. December 2024. AECOM. Project No. 60727989;
- Breeding Birds Survey Report. September 2024. AECOM. Project No. 60727989;
- Reptile Survey Report. November 2024. AECOM. Project No. 60727989;
- Great Crested Newt Habitat Suitability Index Assessment and eDNA Survey Report. August 2024. AECOM. Project No. 60727989;
- Otter and Water Vole Survey Report. October 2024. AECOM. Project No. 60727989;
- Outline Landscape and Ecological Management Plan (Outline LEMP). May 2025. AECOM. Project No. 60727989;
- Arboricultural Impact Assessment. May 2025. AECOM. Project No. 60727989;
- Concept Design. 25 April 2025. AMPYR. Rev. R11.

The development covers an area of approximately 89ha consisting of agricultural fields bound by hedgerows, with some scattered trees. There are several areas of ancient woodland adjacent to the site, to the west, north, east and between the two parcels. There are several ponds on site and areas of running water. The PV layout retains the majority of hedges and mature and veteran trees and in some locations provides buffers along features recognised as of value to biodiversity. Measures to mitigate impacts on biodiversity and provide enhancement that have been incorporated into the development are welcomed however there are some significant areas of discrepancy that need addressing to ensure the development is policy compliant prior to approval of the development.

North Meadow and Clattinger Farm Special Area of Conservation (SAC)

The development lies within the outer zone of influence (4.2 – 9.4km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high proportion of the surviving UK population of snake's head fritillary.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that due to the development site lying more than 8km from the SAC boundaries there is no mechanism for adverse effect on it or its qualifying features. In addition, given the nature of the development, not residential, there is no mechanism for adverse effect from increased recreational visits. The Habitat Regulation Assessment (HRA) has concluded that the application will not result in any mechanism for adverse effect on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

Flaxlands Manor County Wildlife Site (CWS)

The site is located within an ecologically sensitive landscape, supporting a mosaic of habitats of high value, including priority habitat lowland meadows, ancient woodland and designated county wildlife sites. Features within the site are adjacent to and or functionally linked to these sensitive habitats contributing to landscape-scale ecological networks. Flaxlands Manor CWS includes 15.53 hectares of the UK Biodiversity Action Plan (UK BAP) priority habitat lowland meadows. The development includes the placement of solar arrays in four fields (approximately 21 hectares or 70% of the CWS). The CWS is designated for a series of neutral pastures and hay meadows.

The National Vegetation Classification (NVC) survey submitted in support of the application is not sufficient to establish an accurate ecological baseline of the site.

Survey scope: The assessment focused on five fields identified as priority habitat; however, Fields 1–3 shown in Figure 1b: National Vegetation Classification Survey Map – Quadrat Locations (National Vegetation Classification Survey. August 2024. AECOM. Project No. 60727989) fall outside the application red-line boundary. Fields 4 and 5, which lie within the Flaxlands Manor CWS and are designated for neutral pastures and hay meadows, were recorded as modified grassland and subsequently scoped out of detailed NVC assessment without satisfactory justification. These fields were therefore not considered further, despite their designation and recognised ecological value. Remaining areas of CWS grassland within the application boundary, including those mapped as priority habitat, were not surveyed in accordance with their status.

Survey methodology: Where quadrats were taken, they were very limited in number and confined to small sections of surveyed fields. Such a limited quadrat surveys is considered unlikely to provide an accurate representative of whole-field composition.

Additional botanical survey of all the fields within CWS impacted by the development is required to establish a reliable baseline. The survey must provide evidence to confirm the grassland

community and the status of grassland, including full species lists, with relative abundance (DAFOR) and assessment against UKHabs and Priority Habitat criteria.

Priority habitats are considered to be features of nature conservation value by Core Policy 50 of the Wiltshire Core Strategy which states *“development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term”*. There is also an expectation that *“All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development”*.

The proposed layout of PV arrays is considered extremely likely to result in unacceptable losses of priority habitat Lowland Meadows through direct loss of grassland during both construction and due to operational impacts specifically as a result of changes in management and shading. The development will result in damage and disturbance to the CWS and as such in conflict with CP50 of Wiltshire's Strategy which states that *‘Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:*

- *cannot reasonably be avoided*
- *are reduced as far as possible*
- *are outweighed by other planning considerations in the public interest*
- *where appropriate compensation measures can be secured through planning obligations or agreements.’*

It is strongly advised that all the PV arrays are removed from the CWS and any Priority Habitat Lowland Meadow in order to make the scheme acceptable in terms of ecology.

The application provides no mitigation for the loss of priority habitat, neutral grassland, or loss of features of nature conservation importance. No compensation strategy has been provided to demonstrate that the adverse impacts on the CWS will be fully addressed. A strategy to address the loss of possible grassland habitat value should be submitted. Any proposed approach must be based on robust baseline information and clearly show how the impacts will be mitigated. Given that much of the remaining CWS is already in good or moderate condition, there may be limited opportunities to achieve full compensation through enhancement alone. Any compensation plan must be submitted to and agreed with the LPA before approval. If the strategy involves land outside the development red line, it must be secured through a separate legal agreement.

Ancient Woodland

Frith Copse CWS, Cowleaze Copse, Flaxlands Wood and Morris's Copse CWS are areas of ancient semi-natural broadleaved woodland bordering the Site. Ancient woodland must be adequately buffered in accordance with Government guidance, which states that *“proposals should have a buffer zone of at least 15 metres from the boundary of the woodland.”* The submitted LEMP confirms that *“the existing hedgerow network that defines the scale and pattern of fields will be largely unchanged, as will existing blocks of woodland,”* and that the following buffers are incorporated into the design: 30 m from ancient woodland, 15 m from existing woodland and tree groups, 10 m from hedgerows, and protection of individual trees within their Root Protection Areas (RPA). These measures are welcomed and the proposed buffers must be clearly shown on the requested Ecological Mitigation and Enhancement Strategy/Plan.

Wiltshire Core Strategy Core Policy 50 states *“All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development”*. The ancient woodland to the north and south of the site is also designated as County Wildlife Sites, with regard to such sites Core Policy 50 states

“Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment.” The ancient woodland buffers should therefore incorporate native scrub and grassland planting to enhance foraging and commuting opportunities for bats.

Veteran Trees

There are several trees subject to a Tree Preservation Order in the western part of the site, with a couple veteran trees identified in Appendix C: Tree Protection Plan of the Arboricultural Impact Assessment (May 2025. AECOM. Project No. 60727989). Paragraph 193(c) of the NPPF 2024 states *“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”*. There is an expectation that all veteran and nearly veteran trees will be retained and protected by the development. Veteran trees must remain within habitat corridors and must not be isolated by development. Mitigation to demonstrate the retention and protection of veteran trees as identified within the Arboricultural Impact Assessment must be included on the requested Ecological Mitigation and Enhancement Strategy/Plan.

Hedgerows

A network of boundary hedgerows within the site provides important commuting and foraging routes for bats, forming key ecological corridors that connect habitats both within the site and to the adjacent CWS and areas of ancient woodland. Hedgerows identified as being of high value to commuting and foraging bats (Figure 11 of the Bat Activity Report. December 2024. AECOM. Project No. 60727989) will be safeguarded by a minimum 15 m no-works buffer, while suboptimal hedgerows will be protected by a minimum 10 m no-works buffer. These buffers are necessary to maintain hedgerow functionality and to preserve dark corridors essential for continued bat movement.

Where vegetation removal is required to provide access, clearance will be restricted to the minimum necessary. Should gaps be created during construction, temporary flightlines will be installed and maintained until permanent connectivity is reinstated in accordance with the Bat Activity Report. Where permanent gaps greater than 5 m cannot be avoided, mitigation will include strengthening existing commuting routes through gap planting and reduced cutting, habitat enhancement, and creation of replacement corridors. These measures will ensure that hedgerows and associated bat flight routes are appropriately buffered and retained. All proposed buffers and mitigation must be clearly shown within the requested Ecological Mitigation and Enhancement Strategy/Plan.

Ecological Assessment

The ecological assessment does not consider the full redline application boundary and an updated assessment of the impacts of the proposals on features of nature conservation, habitats and species must be provided. The requirement for additional/update surveys for nesting birds, foraging and commuting bats, reptiles, riparian mammals, badger and any other potentially relevant species/species group should be assessed by the applicant's ecologist and carried out if considered necessary to inform the ecological assessment.

Bat Species

The Ecological Impact Assessment acknowledges that the Proposed Development has the potential to cause degradation of approximately 42.2 ha of grassland habitats in use by foraging bats and concludes that the residual effect would be moderate adverse. The site doesn't lie in a bat SAC consultation zone and no confirmed bat roosts were identified within the site; however, the submitted Bat Activity Report identifies that the site supports a nationally important bat assemblage including foraging and commuting Annex II species lesser horseshoe and barbastelle. The majority of bat activity is reported to be associated with the Ancient Woodland surrounding the site, specifically Frith Copse CWS, Cowleaze Copse CWS, Flaxlands Wood CWS and Morris's

Copse CWS specifically the hedges connecting these woodlands. As well as the Flaxlands Manor CWS priority habitat lowland meadows. The latter hedge corridor is recognised as Key Bat Habitat of high value for commuting bats, as well as the hedgerows connecting the ancient woodlands to one another in the assessment. **The following points must be addressed prior to determination to ensure the bat mitigation is appropriate:**

1. Measures to mitigate impacts on bats include a 15m no development buffer along Key Bat Habitat as identified within Figure 11: Habitats of Value to Commuting Bats within the Ecological Assessment Area (Bat Activity Report. December 2024. AECOM. Project No. 60727989), 10m buffer along all hedges and a 30m buffer adjacent to Frith Copse CWS, Cowleaze Copse CWS, Flaxlands Wood CWS and Morris's Copse CWS, and 15m from existing woodland, tree groups and trees with suitability for roosting bats, must be included on the requested Ecological Mitigation and Enhancement Strategy/Plan.
2. The Concept Design (Concept Design. 25 April 2025. AMPYR. Rev. R11) does not include a scaled marker indicating the 30m buffer from ancient woodland or the 15m buffer from existing woodland and tree groups required along the boundaries of the site, therefore it is not possible to easily determine if the proposed 30m and 15m buffers along Frith Copse CWS, Cowleaze Copse CWS, Flaxlands Wood CWS and Morris's Copse CWS has been adhered to. Plans should be amended to include the 30m and 15m scale/buffers, which should include no hardstanding, buildings, access tracks or PV arrays.
3. The Concept Design (Concept Design. 25 April 2025. AMPYR. Rev. R11) does not include a scaled marker indicating the 10m and 15m buffers required along the key bat habitat corridors therefore it is not possible to easily determine if the 10-15m buffer from all hedgerows has been adhered to. Plans should be amended to include the 10m and 15m scale/buffers, which should include no hardstanding, buildings, access tracks or PV arrays.
4. The survey results indicate bat activity at boundaries of Flaxlands Manor CWS is high and includes Annex II species. These boundaries should also be considered Key Bat Habitat and afforded a 15m no development buffer.

The proposal should aim to minimise impacts on foraging habitats by protecting and maintaining the habitats that support the nationally important bat assemblage identified onsite. Key foraging features such as ponds, woodland, and scrub should be appropriately buffered, retained, and, where possible, enhanced to strengthen habitat connectivity and quality. A detailed Bat Mitigation and Enhancement Plan demonstrating that any potential adverse effects on local bat populations are fully avoided or mitigated. This could be provided on the requested Ecological Mitigation and Enhancement Strategy/Plan.

Lighting

The habitat within the proposed development site has been found of high value to roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. Due to the likely presence of photophobic bats, lighting restrictions will be required during construction and operation, this could be secured via condition.

Nesting Birds

The submitted Breeding Bird Survey Report identifies that the site supports six breeding pairs of Skylark. As Skylark listed as a species of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006, they are considered a Priority Species. The proposals will result in the loss of suitable nesting habitat, and while areas of open grassland are

to be retained within and around the solar arrays, these are unlikely to fully compensate for the loss of open fields currently used by breeding skylark. A Farmland Bird Mitigation Strategy must be submitted to confirm how the loss of breeding habitat will be mitigated and to demonstrate that there will be no net loss of local skylark nesting resource.

The area designated for BNG on the Concept Design (Concept Design. 25 April 2025. AMPYR. Rev. R11) was excluded from the red line of the Breeding Bird Survey and thus was not surveyed for nesting birds. Additional survey work is necessary to confirm that the proposed skylark mitigation area is suitable for nesting, whether it already hosts existing skylark territories, and whether it can satisfactorily support the birds that would be displaced by the development. This mitigation area must be clearly shown on a plan and managed specifically for skylark nesting habitat. All mitigation located outside the red line boundary must be secured by legal agreement.

Great Crested Newt (GCN)

The Great Crested Newt Habitat Suitability Index Assessment and eDNA Survey Report concluded that GCN are present within seven of the ponds identified onsite. The report recommends that applicant seeks to enter the District Level Licensing (DLL) scheme due to the confirmed presence of GCN within the suitable waterbodies on the site. GCN are a European Protected Species and must be considered within the planning process.

To demonstrate the scheme is accepted under the District Level Licensing Scheme for Great Crested Newts, the *Impact Assessment and Conservation Payment Certificate (IACPC)*, which must be signed by the applicant and countersigned by Natural England and submitted to the LPA. [Please note: 'Annex 3: Site Location' must also be submitted with the IACPC and correspond with the red line site boundary submitted with the planning application].

Water Vole

Water vole field signs were recorded at Pond 2 and Watercourse 2, confirming low-level presence. The recommendations in the Otter and Water Vole Survey Report are supported. A minimum 10m buffer should be maintained from all watercourses and waterbodies, with pollution prevention measures implemented through the CEMP. A Natural England licence may be required should works extend to in-channel or bank-side areas. Should works be delayed by more than 18 months, an updated water vole survey will be required prior to commencement.

Reptiles

AECOM undertook reptile presence/absence surveys across two fields, using artificial refugia during 2024/2025; no reptiles were recorded. However, suitable habitat is present, and the site is therefore assessed as being of local value for reptiles. A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between March and October, under the supervision of a suitably qualified ecologist. Ecological enhancements, including the creation of reptile refuges and hibernacula, are proposed; these measures should be included within a Construction Environmental Management Plan (CEMP) and shown on the requested Ecological Mitigation and Enhancement Strategy/Plan.

Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A completed statutory metric calculation (07 May 2025) confirming the baseline and predicted post-development biodiversity units of Site has been submitted (including the condition assessment sheets and maps).

The following issues must be addressed in the baseline prior to determination:

1. The redline boundary used for the Biodiversity Net Gain Assessment (May 2025 AECOM. Project No. 60727989) is different from the redline boundary used within the NVC, PEA and protected species assessments. The baseline survey boundary for the BNG assessment must match application boundary.
2. The proposed Biodiversity Net Gain site is located within the designated Flaxlands Manor County Wildlife Site (CWS), classified as neutral pastures and hay meadows habitat and priority habitat lowland calcareous grassland. Further justification of the allocated baseline as 'modified grassland' is required (refer to Flaxlands Manor County Wildlife Site (CWS) section above).
3. Irreplaceable habitat tab of the metric calculation must be filled out to include veteran trees identified onsite.
4. Figure 4: UK Habitat Classification Map (Preliminary Ecological Appraisal Report. June 2024. AECOM. Project No. 60727989) records the CWS field north of the site as 'modified grassland'. However, the NVC survey (National Vegetation Classification Survey. August 2024. AECOM. Project No. 60727989) identifies this area (Field 1) as MG5 grassland *Cynosurus cristatus* – *Centaurea nigra*. Furthermore, Fields 1–3 are classified as MG5 within the NVC report, however, the PEA assigns different UKHab types across the different fields (i.e. modified grassland and other neutral grassland). The species list provided supports classification as UKHab g3a Lowland Meadow, and therefore the current UKHab mapping is inconsistent with both the NVC findings and the recorded botanical data.
5. Baseline mapping shows fields to the west and east of the Site as 'other neutral grassland' and other fields as 'modified grassland'. This variation in habitat type selection requires clarification.

The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- The calculation assumes land under solar arrays can provide 'Grassland – other neutral grassland' of medium distinctiveness and moderate condition. In line with advice from Natural England the council considers land under solar arrays to be 'Modified Grassland' of low distinctiveness. Evidence to demonstrate that grassland of this higher biodiversity value can be achieved is required or the tables must be amended to predict 'Modified Grassland' of low distinctiveness below the solar arrays.
- The calculation assumes that land surrounding and between the solar arrays can support 'Lowland Meadows' of very high distinctiveness and moderate condition. Given the shading, management restriction and panel maintenance regimes it is extremely unlikely that the proposed grassland type and condition can be achieved. Unless justification supported by evidence demonstrating that grassland of higher biodiversity value can actually be established, or the calculations must be revised to reflect a more appropriate habitat type, condition and distinctiveness.
- The trading summaries must be satisfied.

In order for the council to fulfil its BNG monitoring responsibilities. A BNG monitoring contribution will be required and secured via a separate legal agreement.

An Ecology Mitigation and Enhancement Plan (EMEP) addressing the issues raised above is required. It must include a scaled drawing showing all retained and required ecological features, together with all mitigation and enhancement measures in relation to solar panel layout. Enhancement priorities measured buffer distances, habitat types and areas must be specified.

[SolarPVFarmEcologyAdviceNoteJuly2021.pdf \(wiltshire.gov.uk\)](#)

Landscape and Ecological Management Plan (LEMP)

The provided LEMP must be amended in response to these comments and demonstrate how habitats will be managed and protected during the operational phase of development.

Decommissioning

A condition is required to ensure an appropriate decommissioning and restoration plan is submitted to and agreed with the council a minimum of 12 months prior to decommissioning. The condition must ensure the plan will be supported by an impact assessment based on up-to-date baseline survey and carried out according to the current guidelines. It must set out clear aims of restoration to benefit key habitats and species.

Grid Connection

The submitted ecological impact assessment and BNG calculations do not include details of the proposed grid connection. Additional information is therefore required to ensure the entire route is assessed for potential ecological impacts. Additional information is required to ensure the cable route is included in its entirety so that a full ecological assessment can be made. The assessment should identify and avoid impacts on any priority habitats and demonstrate how these will be conserved and enhanced in line with the NPPF.

Construction Environment Management Plan (CEMP)

Methods to avoid construction impacts are provided in the EcIA. A Construction Environmental Management Plan (CEMP) must be submitted to demonstrate how construction will avoid ecological impacts and ensure compliance on site, as outlined within the Solar PV Farms and Ecology advice note.

In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: these will be added once the issues above have been addressed

Final sign off – all matters addressed:

Ecologist	Date
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