

Flaxlands Solar Farm Planning Responses: Natural England and Local Planning Authority

Project name Flaxlands Solar Farm	Project number 60727989	Client Ampyr Solar Europe	Date February 2026
Prepared by KM MCIEEM Senior Ecologist	Reviewed by LN MCIEEM Associate Director	Approved Emma Norman	Planning Reference PL/2025/05830

Planning consultation and comment from Natural England and Wiltshire Council have been received in relation to the Flaxlands Solar Farm planning submission to Wiltshire Council (ref PL/2025/05830).

The response from Natural England was provided by the Planning and Conservation Senior Officer (Wessex Area Team) on 18 September 2025. A meeting was held on 11 November 2025 between Natural England, the Applicant (Ampyr Solar Europe) and AECOM to provide opportunity for discussion. Responses to Natural England planning comments are provided below in Table 1.

The response from Wiltshire Council Ecologist was received on 11 November 2025. These comments and responses are provided in Table 2.

Table 1. Natural England Planning Comment Response

Natural England Comment	Response and Action
<i>No detailed baseline botanical surveys have been submitted for the areas proposed for restoration of habitats for Biodiversity Net Gain (BNG).</i>	The assessment meets the requirement for BNG assessment. Areas proposed for restoration were subject to walkover by an experienced ecologist with 30 years' experience of professional botanical surveys. The surveyor confirmed the areas proposed for restoration (Field 4 and 5 (see Appendix D)) were Modified Grassland in Poor condition. This level of assessment meets the requirement for BNG assessment. National Vegetation Classification (NVC) survey methodology does not apply to Modified Grassland, therefore Field 4 and 5 was not subject to NVC and a species list was not recorded. Photographs of Field 4 and 5 are provided in Appendix A of this response and in Appendix B of the National Vegetation Classification (NVC) Report these help demonstrate the structure and species diversity of these Fields. As provided in the NVC report Fields 4 and 5 were dominated by species typical of modified grassland, including perennial rye <i>Lolium perenne</i> and white clover <i>Trifolium repens</i> (Section 5.2.1 of NVC Report) Additional Notes: Field 4 – Recently mown and improved for agriculture. No species list was recorded. National Vegetation Classification (NVC) survey methodology does not apply to Modified Grassland, therefore the field was not subject to NVC and a species list was not recorded. Field 5 - Patches of more interesting vegetation. Field 5 is unmanaged and therefore not in good condition. Field 5 has floristic potential if sympathetically managed/grazed. An observational species list was made by an experienced botanist during a Tree Climbing Inspection at the Site between June and Sept 2024. No formal list was made, as per Field 4. Species observed include tufted hair grass, ragged robin, cuckoo flower, Yorkshire fog, soft brome, annual meadow grass, cleavers, white clover, red clover, chickweed, meadow buttercup. Abundance using DAFOR (Dominant, Abundant, Frequent, Occasional, Rare), was not recorded.
<i>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.</i>	This assessment meets the requirement for BNG assessment. Fields within the red line boundary were subject to walkover by an experienced ecologist with 30 years' experience of professional botanical surveys. Habitats within the site and CWS are identified as Other Neutral Grassland in Good condition, whilst those identified for restoration works (Field 4 and 5) are Modified Grassland in Poor Condition. The survey confirmed Fields 4 and 5 did not meet priority habitat condition based on professional judgment (observation of the habitat type and condition, as illustrated in Appendix A and

Natural England Comment	Response and Action
	reported in Section 5.2.1 of the NVC Report). NVC survey methodology does not apply to Modified Grassland, therefore Field 4 and 5 were not subject to NVC, a species list was not record and no quadrats were deployed to assign an NVC community. Photographs of Field 3, 4 and 5 are provided in Appendix A. These photographs help illustrate the clear difference in species composition, structure and condition between Field 3 Other Neutral Grassland in Good condition, and Fields 4 and 5 Modified Grassland in Poor Condition. Appendix B shows the updated Concept Design (Feb, 2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
Further information is needed on the quality of the grassland recognised as 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 Wiltshire and Swindon Biological Records Centre (WSBRC) (e.g. habitat description, monitoring data or species lists).	From the desk study completed in May 2024, WSBRC describe the CWS as 'a series of neutral pastures and hay meadows with differing geology and hydrology' and assign the main habitat as 'neutral grassland'. No information regarding monitoring of the CWS was provided. Wiltshire Wildlife Trust has been contacted and the response on 15 November 2025 confirmed that they hold no information for the CWS as it is privately owned and not within their management. They suggested contacting the WSBRC for any historical information. AECOM on behalf of the Applicant have contacted the WSBRC. On 18 November 2025 WSBRC provided a citation which describes a visit undertaken in 2017. This assigns the CWS habitat as species-rich neutral grassland with 15.5 ha of priority habitat lowland meadows. Indicators of high-quality grassland identified in 2017 include sneezewort <i>Achillea ptarmica</i>, agrimony <i>Agrimonia eupatoria</i>, common knapweed <i>Centaurea nigra</i>, lady's bedstraw <i>Galium verum</i>, meadow vetchling <i>Lathyrus pratensis</i>, oxeye daisy <i>Leucanthemum vulgare</i>, common bird's foot trefoil <i>Lotus corniculatus</i>, water mint <i>Mentha aquatica</i>, yellow rattle <i>Rhinanthus minor</i>, betony <i>Stachys officinalis</i>, and goat's beard <i>Tragopogon pratensis</i>. This information is in concurrence with the results of habitat surveys and reporting submitted by AECOM in the PEA and NVC. No further survey is proposed. Appendix B shows the updated Concept Design (Feb, 2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
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 on the relative abundance within the sward.	Species lists are provided in the Preliminary Ecological Appraisal (AECOM, June 2024) and NVC Report (AECOM, August 2024) The Preliminary Ecological Appraisal (AECOM, June 2024) states 'The entirety of the eastern land parcel consists of neutral grassland fields with generally a higher species abundance in the south (see Photograph 1, Appendix E). This area does not appear to have been recently grazed by cattle or sheep. Grass species present include sweet vernal-grass (<i>Anthoxanthum odoratum</i>), Yorkshire fog (<i>Holcus lanatus</i>), annual meadow-grass (<i>Poa annua</i>), meadow foxtail (<i>Alopecurus pratensis</i>), field wood-rush (<i>Luzula campestris</i>), yellow oat-grass (<i>Trisetum flavescens</i>), soft-brome (<i>Bromus hordeaceus</i>), quaking-grass (<i>Briza media</i>), crested dog's-tail (<i>Cynosurus cristatus</i>) and fescue species (<i>Festuca</i> sp.)'...'It was noted that areas of this habitat further south were richer in species diversity. Locally abundant species include meadowsweet (<i>Filipendula ulmaria</i>), and yellow rattle (<i>Rhinanthus minor</i>) (see Target Note TN5, Appendix D and Photograph 2 Appendix E) as well as locally abundant common sedge (<i>Carex nigra</i>) and field scabious (<i>Knautia arvensis</i>).' NVC Notes: Field 4 – Recently mown and improved for agriculture. No species list was recorded. National Vegetation Classification (NVC) survey methodology does not apply to Modified Grassland, therefore the field was not subject to NVC and a species list was not record. Field 5 - Patches of more interesting vegetation. Field 5 is unmanaged and therefore not in good condition. Field 5 has floristic potential if sympathetically managed/grazed. An observational species list was made by an experienced botanist during a Tree Climbing Inspection at the Site between June and Sept 2024. No formal list was made, as per Field 4. Species observed include tufted hair grass, ragged robin, cuckoo flower, Yorkshire fog, soft brome, annual meadow grass, cleavers, white

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	clover, red clover, chickweed, meadow buttercup. Abundance using DAFOR, was not recorded. Field 3 – Mapped as MG5. NVC Report states Species include: <i>yellow rattle (Rhinanthus minor)</i>, <i>betony (Stachys officinalis)</i>, <i>common knapweed (Centaurea nigra)</i>, <i>meadow buttercup (Ranunculus acris)</i>, <i>sweet vernal grass (Anthoxanthum odoratum)</i>, <i>Yorkshire fog (Holcus lanatus)</i>, <i>red fescue (Festuca rubra)</i>, <i>ribwort plantain (Plantago lanceolata)</i>, <i>tufted hairgrass (Deschampsia cespitosa)</i>, <i>common birdsfoot trefoil (Lotus corniculatus)</i>, <i>greater birdsfoot trefoil (Lotus pedunculatus)</i>, <i>oval sedge (Carex leporina)</i>, <i>common sorrel (Rumex acetosa)</i>, <i>creeping bent (Agrostis stolonifera)</i>, <i>common bent (Agrostis capillaris)</i>, <i>self heal (Prunella vulgaris)</i>, <i>mint sp. (Mentha sp.)</i>, <i>meadowsweet (Filipendula ulmaria)</i>, <i>common mouse-ear (Cerastium fontanum)</i>. DAFOR was not recorded.
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 through the operational phase of the development.	Management of the CWS within application boundary will be addressed within the Construction Environmental Management Plan (CEMP)/Landscape and Ecological Management Plan (LEMP) produced prior to construction. Management of the CWS not within the application boundary is outside the responsibilities of the Applicant. Appendix B shows the updated Concept Design (Feb, 2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
The potential for the scheme to maintain the ecological value of the CWS are limited further by the removal from the restoration and enhancement element of the scheme of the fields confirmed to support Lowland Meadows Priority Habitats. The scheme cannot 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.	Highest quality habitats (Lowland Meadows Priority Habitat identified during NVC survey) within the CWS have been excluded from the application development boundary (Fields 2 and 3). Appendix B shows the updated Concept Design (Feb, 2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site. The Applicant proposes removal from the solar PV array to increase connectivity of the retained grasslands and increase retention of existing grasslands. A buffer and management access will be maintained (sufficient width for a tractor), a 10 m buffer from hedgerows (Table 5.2, EciA, AECOM 2024) which will allow access and continued manage of any adjacent areas. The land is outside of the application boundary is not part of the planning submission. The land will stay within existing land ownership and current land management actions are anticipated to be maintained post development. The LEMP will seek to confirm these management actions and will include opportunities for positive enhancements to management. Impacts to retained areas will be avoided through the inclusion of pollution prevention measures during construction.
Only one 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.	Static bat detectors were deployed across the Site to sample the range of habitats present. Table 4.4 of the Bat Activity Report highlights where the greatest number of passes/hour were recorded and Figure 1 shows the location of the deployed detectors. Figures 8-10 map the location of the bat passes during Nighttime Bat Walkovers. The bat activity report highlights areas within the Site that are likely to be of greatest value to foraging and commuting bats, illustrated on Figure 11. Heat maps are not a requirement in the Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023). The Applicant has attached an additional figure to this response in Appendix C which illustrates the parts of the Site which will be retained and enhanced (though use of buffers and management) to create green corridors during operation for the benefit of commuting and foraging bats, as requested by Natural England in the meeting on the 11 November 2025.
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).	Buffers implemented around ancient woodland designations will not be subject to works and it is assumed that scrub will colonise the areas naturally (i.e. not planted) to create an ecotone. Natural England confirmed during the meeting on 11 November 2025 that this would be an appropriate measure. Hedgerows within the Site will be enhanced through the creation of buffers in which works will not take place and where there will be a change in management routine post-development. Currently, grasslands are grazed up to the base of hedgerows. Buffering the hedgerows will reduce disturbance and soil compaction cause by construction, and that caused by grazing and farming practices. This will allow the development of ground flora and saplings at the bases of the hedgerows enhancing their structure. Currently, the

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	hedgerows are subject to regular cutting. Hedgerows within the Site will be subject to reduced management (cutting regime) during operation of the scheme, this will allow them to grow taller and wider enhancing their structure and increasing the robustness and resilience of the retained hedgerows as a connecting green corridor. Management actions will be confirmed and secured through the LEMP. The Applicant will investigate options to plant a tree line between Morris's Copse and Frith Copse to enhance connectivity. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site, this removes PV adjacent to Ancient Woodland in that area.
<i>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 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, woodlands and scrub are suitably buffered, connected and where possible enhanced as bat foraging habitats.</i>	Mitigation included within the application to minimise impacts on the habitats most likely to support the bat assemblage include: • Panels have avoided the highest quality habitats during the design process, as illustrated on the final design plan. Five of the eight fields within the CWS are not being developed (within the application design). • Buffers have been included by design as outlined in Table 5.2 of the EclA, this includes no works to occur within 30 m of ancient woodland, 15 m of woodland and individual trees, 10-15 m of hedgerows and 10 m of watercourses and waterbodies. This will retain green corridors and provide foraging habitat. Appendix B shows the updated Concept Design (Feb, 2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site. The Applicant proposes removal from the solar PV array to increase connectivity of the retained grasslands and increase retention of existing grasslands to the benefit of bats.
<i>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.</i>	The Applicant has attached to this response in Appendix C an additional Figure which illustrates the parts of the Site which will be retained and enhanced (through use of buffers and management) to create green corridors during construction and operation for the benefit of commuting and foraging bats. Page 26 of the submitted Bat Activity Report (AECOM, 2024) details the potential impacts of the development, with recommendations for avoidance and mitigation provided from page 30. These measures have been incorporated to the design of the development. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site. A bat foraging mitigation plan will not be submitted, as the information is provided in the Bat Appendix, EclA and attached Figure.
<i>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 redline 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.</i>	The two fields (Fields 4 and 5) identified for restoration to lowland meadows priority habitat are suitable to support nesting skylark and will be considered as part of the compensation strategy. A mitigation strategy will be prepared and submitted post consent, following precedent set by these determined applications PL/2024/11631. This will include the identification of off-site areas for compensation. The strategy will include measures to maintain Fields 4 and 5 in a condition suitable for nesting skylark.

Table 2. Wiltshire Council Ecologist Planning Comment Response

Wiltshire Council Ecologist Comment	Response and Action
Flaxlands Manor County Wildlife Site (CWS)... 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.	Fields 1, 2 and 3 (see Appendix D) were part of the original survey scope, but were designed out of development as a result of the survey findings to avoid the ecological impact of the development on these Fields. Habitats within the site boundary and CWS (in combination) are identified as Other Neutral Grassland in Good condition, whilst those identified for restoration works (Field 4 and 5) are Modified Grassland in Poor Condition. Areas proposed for restoration were subject to walkover by an experienced ecologist with 30 years' experience of professional botanical surveys. The surveyor confirmed the areas proposed for restoration (Field 4 and 5) were Modified Grassland in Poor condition. As provided in the NVC report Fields 4 and 5 were dominated by species typical of modified grassland, including perennial rye <i>Lolium perenne</i> and white clover <i>Trifolium repens</i> (Section 5.2.1 of NVC Report). Photographs of Field 4 and 5 are provided in Appendix A of this response and in Appendix B of the National Vegetation Classification (NVC) Report. These illustrate the difference between the structural and species diversity of Field 3, compared to Field 4 and 5. Additional Notes: Field 4 – Recently mown and improved for agriculture. No species list was recorded. National Vegetation Classification (NVC) survey methodology does not apply to Modified Grassland; therefore, the field was not subject to NVC and a species list was not record. Field 5 - Patches of more interesting vegetation. Field 5 is unmanaged and therefore not in good condition. Field 5 has floristic potential if sympathetically managed/grazed. An observational species list was made by an experienced botanist during a Tree Climbing Inspection at the Site between June and Sept 2024. No formal list was made, as per Field 4. Species observed include tufted hair grass, ragged robin, cuckoo flower, Yorkshire fog, soft brome, annual meadow grass, cleavers, white clover, red clover, chickweed, meadow buttercup. Abundance using DAFOR, was not recorded. The surveyor confirmed the fields did not meet priority habitat condition based on professional judgment (observation of the habitat type and condition, as illustrated in Appendix A and reported in Section 5.2.1 of the NVC Report). NVC survey methodology does not apply to Modified Grassland, therefore Field 4 and 5 were not subject to NVC, a species list was not record and no quadrats were deployed to assign an NVC community. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
Flaxlands Manor County Wildlife Site (CWS)... 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.	Five quadrats per homogenous habitat stand is the standard minimum survey effort for NVC to classify the vegetation type according to the National Vegetation Classification Users' handbook (Rodwell, 2006).
Flaxlands Manor County Wildlife Site (CWS)... Additional botanical survey of all the fields within the 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 relatively abundance (DAFOR) and assessment against UKHabs and Priority Habitat criteria.	AECOM, June 2024) and NVC Report (AECOM, August 2024) The Preliminary Ecological Appraisal (AECOM, June 2024) states 'The entirety of the eastern land parcel consists of neutral grassland fields with generally a higher species abundance in the south (see Photograph 1, Appendix E). This area does not appear to have been recently grazed by cattle or sheep. Grass species present include sweet vernal-grass (<i>Anthoxanthum odoratum</i>), Yorkshire fog (<i>Holcus lanatus</i>), annual meadow-grass (<i>Poa annua</i>), meadow foxtail (<i>Alopecurus pratensis</i>), field wood-rush (<i>Luzula campestris</i>), yellow oat-grass (<i>Trisetum flavescens</i>), soft-brome (<i>Bromus hordeaceus</i>), quaking-grass (<i>Briza media</i>), crested dog's-tail (<i>Cynosurus cristatus</i>) and fescue species (<i>Festuca</i> sp.)'. 'It was noted that areas of this habitat further south were richer in species diversity. Locally abundant species include meadowsweet (<i>Filipendula ulmaria</i>), and yellow rattle (<i>Rhinanthus minor</i>) (see Target Note TN5, Appendix D and Photograph 2 Appendix E) as well as locally

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	<i>abundant common sedge (Carex nigra) and field scabious (Knautia arvensis).</i> NVC Notes: Field 4 – Recently mown and improved for agriculture. No species list was recorded. NVC survey methodology does not apply to Modified Grassland, therefore the field was not subject to NVC and a species list was not record. Field 5 - Patches of more interesting vegetation. Field 5 is unmanaged and therefore not in good condition. Field 5 has floristic potential if sympathetically managed/grazed. An observational species list was made by an experienced botanist during a Tree Climbing Inspection at the Site between June and Sept 2024. No formal list was made, as per Field 4. Species observed include tufted hair grass, ragged robin, cuckoo flower, Yorkshire fog, soft brome, annual meadow grass, cleavers, white clover, red clover, chickweed, meadow buttercup. Abundance using DAFOR, was not recorded. Field 3 - NVC Report states: <i>Mapped as MG5.</i> Species include: <i>yellow rattle (Rhinanthus minor), betony (Stachys officinalis), common knapweed (Centaurea nigra), meadow buttercup (Ranunculus acris), sweet vernal grass (Anthoxanthum odoratum), Yorkshire fog (Holcus lanatus, red fescue (Festuca rubra), ribwort plantain (Plantago lanceolata), tufted hairgrass (Deschampsia cespitosa), common birdsfoot trefoil (Lotus corniculatus), greater birdsfoot trefoil (Lotus pedunculatus), oval sedge (Carex leporina), common sorrel (Rumex acetosa), creeping bent (Agrostis stolonifera), common bent (Agrostis capillaris), self heal (Prunella vulgaris), mint sp. (Mentha sp.), meadowsweet (Filipendula ulmaria), common mouse-ear (Cerastium fontanum).</i> DAFOR was not recorded. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site. No additional survey is proposed.
<i>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.</i>	Where AECOM surveys have identified the presence of lowland meadow priority habitats, these have been excluded from the application development area. The development area within the CWS has been reduced. Panels are not proposed on five of the eight CWS fields in the application design. Buffers have been included by design as outlined in Table 5.2 of the EclA, this includes no works to occur within 30 m of ancient woodland, 15 m of woodland and individual trees, 10-15 m of hedgerows and 10 m of watercourses and waterbodies. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
<i>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 most 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.</i>	Where AECOM surveys have identified the presence of lowland meadow priority habitats, these have been excluded from the application development area (Fields 1, 2 and 3). Compensation is proposed in two fields outside of the development area in Fields 4 and 5, the LEMP and CEMP will detail compensation strategy including protection measures to be incorporated to the construction and operation of the scheme to ensure that compensation is achieved. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
<i>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: 30m from ancient woodland, 15m rom existing woodland and tree groups, 10m from hedgerows and protection of individual trees</i>	Comment noted. Buffers will be shown within the LEMP.

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<i>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.</i>	
<i>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.</i>	Buffers of 30 m implemented around ancient woodland designations will not be subject to works and it is assumed that scrub will colonise the areas naturally (i.e. not planted) to create an ecotone. Natural England confirmed during the meeting on 11 November 2025 that this would be an appropriate measure. . Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
<i>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.</i>	Comment noted. Protection of trees will be shown within the LEMP.
<i>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 applicants ecologist and carried out if considered necessary to inform the ecological assessment.</i>	The ecological assessment does consider the full redline application boundary.
<i>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 and Plan.</i>	Comment noted. Buffers will be shown within the LEMP. The Applicant has attached to this response in Appendix C an additional Figure which illustrates the parts of the Site which will be retained and enhanced (though use of buffers and management) to maintain green corridors during operation for the benefit of commuting and foraging bats.
<i>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.</i>	The Applicant has attached to this response in Appendix C an additional Figure which illustrates the parts of the Site which will be retained and enhanced (though use of buffers and management) to maintain green corridors during operation for the benefit of commuting and foraging bats. Page 26 of the submitted Bat Activity Report (AECOM, 2024) details the potential impacts of the development, with recommendations for avoidance and mitigation provided from page 30. These measures have been incorporated to the design of the development. A bat foraging mitigation plan will not be submitted, as the information is provide in the Bat Appendix, ECIA and attached Figure.
<i>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.</i>	The two fields (Fields 4 and 5) identified for restoration to lowland meadows priority habitat are suitable to support nesting skylark and will be considered as part of the compensation strategy. These field were not subject to survey as part of the breeding bird assessment, but no skylark were noted in that area during the surveys. A skylark mitigation strategy will be prepared. This will include the identification of off-site areas for compensation. The skylark strategy will include measures to maintain Fields 4 and 5 in a condition suitable for nesting skylark. Appendix B shows the updated Concept Design (Feb,2026). No PV is proposed within Flaxlands Manor Farm Local Wildlife Site.
<i>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 Report and thus was not surveyed for nesting birds. Additional survey work is necessary to confirm that the</i>	Based on professional judgement (observations of the habitat type and structure in combination with professional experience of the species' requirements) during the breeding bird surveys, the two fields (Fields 4 and 5) identified for restoration to lowland meadows priority habitat are suitable to support nesting skylark

Wiltshire Council Ecologist Comment	Response and Action
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.	and will be considered as part of the compensation strategy. These fields were not subject to survey as part of the breeding bird assessment, but no skylark were noted in that area during the surveys. A mitigation strategy will be prepared. This will include the identification of off-site areas for compensation. The strategy will include measures to maintain Fields 4 and 5 in a condition suitable for nesting skylark.
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].	This is in progress awaiting invoice receipt from Natural England. The first payment has been made, and Ampyr Solar Europe are in discussion with Natural England.
Biodiversity Net Gain... The following issues must be addressed in the baseline prior to determination: 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 UK Hab 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 UK Hab mapping is inconsistent with both the NVC findings and the recorded botanical data.'	Fields 1, 2 and 3 are excluded from development following their classification as lowland meadow habitats, and the BNG Calculation reflects this.
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.	Solar Energy UK Natural Capital Best Practice Guidance¹ states 'Current research (awaiting publication) shows that in most cases, habitats within solar farms can be classified as 'Other Neutral Grassland' of Moderate condition within the metric (where the site is formerly arable or pasture). The habitat directly under the panels is more variable, but in most cases, a similar habitat can be achieved. Natural England has advised SEUK that in the absence of empirical evidence, ecologists should categorise it as one area or sub-categorise it into multiple areas based on their experience of the habitats under panel areas'. It also describes a case study in which increasing the condition of existing grazing pasture was achieved by 'reducing the management, preventing poaching and allowing plants to flower during the summer'. Habitats around and beneath solar panels will be monitored throughout the lifetime of the development. The client is willing to agree to the purchase of units at 10 years, if appropriate habitats have not successfully persisted.

End

¹ <https://solarenergyuk.org/wp-content/uploads/2022/05/Natural-Capital-Best-Practice-Guidance.pdf>

Appendix A – Photographs of Fields 3, 4 and 5



Field 4



Field 4



Field 5



Field 5



Field 5



Field 5

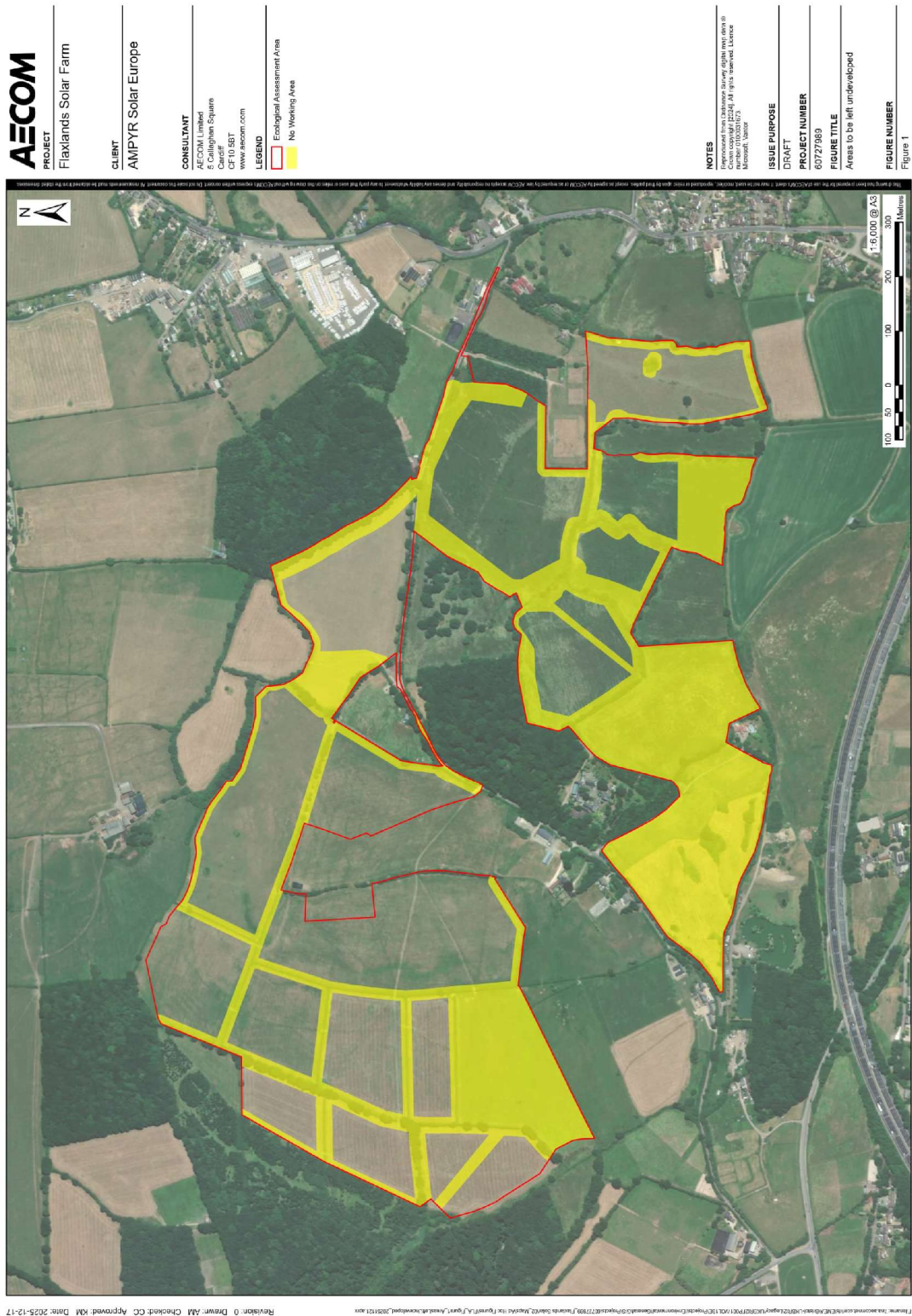


Field 3



Field 3

Appendix C – Figure of Post-Construction Connectivity for Bats



Appendix D – NVC Figure

