

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell (Ecologist)
Date:	10/11/2025 27/05/2026 updated comments
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 27/05/2026 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
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	YES 27/05/2026 Concept Design. 12 February 2026. AMPYR. Rev. R14; Flaxlands Solar Farm Planning Responses: Natural England and Local Planning Authority. February 2026.

				AECOM. Project No. 60727989.
4	Nesting birds	NPPF 2024, CP50.	10/11/2025 A plan showing the mitigation area to be managed as a compensatory skylark nest site	YES 27/05/2026 (further information to be conditioned) Flaxlands Solar: Outline Skylark Mitigation Plan. April 2026. AECOM. Project No. 60727989.
5	Great Crested Newt (GCN)	Habs Regs, WCA, CP50	10/11/2025 27/05/2026 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 27/10/2026 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.	YES 22/05/2026 Outline Landscape and Ecological Management Plan (Outline LEMP). April 2026. AECOM. Project No. 60727989.
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.	To be conditioned 22/05/2026 - Ecological Impact Assessment (EcIA). May 2025. AECOM. Project No. 60727989; - Preliminary Ecological Appraisal Report. June 2024. AECOM. Project No. 60727989; - Outline Landscape and Ecological Management Plan (Outline LEMP). April 2026. AECOM. Project No. 60727989.

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:

- [Flaxlands Solar: Outline Skylark Mitigation Plan. April 2026. AECOM. Project No. 60727989;](#)
- [Flaxlands Solar Farm Planning Responses: Natural England and Local Planning Authority. February 2026. AECOM. Project No. 60727989;](#)
- The Statutory Biodiversity Metric. 07 May 2025. Iteration 1;
- [Biodiversity Net Gain Assessment. 23 April 2026. AECOM. Project No. 60727989. Rev. 2;](#)
- 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 \(Outline LEMP\). April 2026. AECOM. Project No. 60727989;](#)
- Arboricultural Impact Assessment. May 2025. AECOM. Project No. 60727989;
- [Concept Design. 12 February 2026. AMPYR. Rev. R14.](#)

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.

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 has been amended to remove PV arrays from within the Flaxlands Manor CWS, which addresses the previous concerns regarding direct impacts to the County Wildlife Site. A range of mitigation and protection measures are proposed, including the retention of key habitats, implementation of buffer zones, and construction safeguards which will be secured by condition. The Outline LEMP also sets out a programme of habitat enhancements within the CWS with proposals for lowland meadow habitats, and neutral grassland retained, enhanced or created across the wider site.

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 for 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. Further mitigation includes 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.**

Where access requires vegetation removal, works will be minimised. Any gaps will be bridged with temporary flightlines until permanent connectivity is restored. If permanent gaps >5 m are unavoidable, additional planting and replacement corridors will be provided. **These measures ensure continued bat movement and must be shown on the Ecological Mitigation and Enhancement Strategy/Plan.**

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.**

The Outline Landscape Masterplan (Landscape and Ecological Management Plan (Outline LEMP). April 2026. AECOM. Project No. 60727989) does not clearly demonstrate the extent of the proposed ecological buffer zones, including the 30 m buffer from ancient woodland, the 15 m buffer from existing woodland and tree groups, and the 10 to 15 m buffers associated with key bat habitats as identified within the Bat Activity Report. As a result, it is not currently possible to identify the required protection measures. The plans must be revised to show all proposed buffer zones.

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. The Flaxlands Solar: Outline Skylark Mitigation Plan (April 2026. AECOM. Project No. 60727989) identifies that, following amendments to the site layout, skylark territories 3 and 5 will be retained within the development proposals, resulting in four identified territories (1, 2, 4 and 6) being directly impacted by the scheme. 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 Skylark 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.~~

~~It is noted that a skylark mitigation strategy is being prepared. This must be shared with the ecology team prior to determination for assessment~~

To compensate for loss of habitat for the ground nesting birds of conservation importance, an area of land, in the south of the site, will be used to create suitable breeding habitat for Skylark. The compensation areas must be demonstrated to be of a sufficient size and quality to support the four displaced skylark territories, in addition to the two territories already associated with retained mitigation fields. Compensation as detailed in Flaxlands Solar: Outline Skylark Mitigation Plan (April 2026. AECOM. Project No. 60727989), plans is acceptable and must be secured with the permission if approval is forthcoming. Further detailed information will be required as part of the Skylark Mitigation Strategy including, plans identifying the location and extent of all skylark compensation areas; updated breeding bird surveys, and a detailed habitat management and monitoring plan.

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.

The applicant has indicated that they have applied to the Great Crested Newt District Level Licensing Scheme for this proposal. However, the application to the LPA does not include the signed and countersigned Impact Assessment Conservation Payment Certificate (IACPC), nor ANNEX 3 of this document including the location plan of

the development. We are therefore unable to verify that the location to be licensed corresponds with the red line boundary of the application or that Natural England has confirmed that the proposal meets the initial criteria necessary to be included in the scheme. This information is required prior to determination of this application.

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. Iteration. 1) 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. Irreplaceable habitat tab of the metric calculation must be filled out to include veteran trees identified onsite.** As stated within the Landscape and Ecological Management Plan (Outline LEMP). April 2026. AECOM. Project No. 60727989 "Five veteran trees were recorded on Site...These trees are considered irreplaceable habitats and will be retained in full".
3. The updated Biodiversity Net Gain Assessment (23 April 2026. AECOM. Project No. 60727989. Rev. 2) shows a baseline area habitat value of 428.73 units, this is lower than the 429.32 area habitat units in the provided statutory metric calculation (07 May 2025. Iteration. 1) submitted with the application. **The baseline habitat value should not have**

changed since the application was submitted and justification for the new value is required.

4. The provided Statutory Biodiversity Metric (07 May 2025. Iteration. 1) does not match the updated Biodiversity Net Gain Assessment (23 April 2026. AECOM. Project No. 60727989. Rev. 2). To ensure accuracy and compliance, the baseline habitat types recorded within the statutory biodiversity metric and any accompanying habitat maps/documentation must align and, where necessary, amended to reflect the habitats actually present on site.
5. The condition assessment sheets for the baseline habitats have not been submitted. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.

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.

Where the Biodiversity Net Gain Assessment has been updated, the baseline habitat map, condition assessments and the statutory biodiversity metric must also be updated to reflect any changes. All submitted documentation must align, with the same recorded baseline habitat area reflected across all documentation.

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

- The trading summaries must be satisfied.
- 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
- 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 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. Given the location of the proposed BNG site, the proposed BNG habitat must align with the objectives of the designated CWS.

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured.

The proposed BNG is considered 'significant' due to:

- i. the scale and nature of the application (major);
- ii. units required (472.25 habitat units, 88.88 hedgerow units and 0.46 watercourse units), and
- iii. the BNG proposed (including medium distinctiveness habitats of other neutral grassland, ditches and species-rich native hedgerow and very high distinctiveness habitats of lowland meadows).

A Habitat Management and Monitoring Plan (HMMP) will be required and should be secured via condition.

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30 year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be £12,000 plus legal fees payable on commencement of development.

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. Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d). It is anticipated that all developments will deliver no net loss of biodiversity. Section 4 of the Preliminary Ecological Appraisal Report (June 2024. AECOM. Project No. 60727989) recommends the inclusion of bird boxes, bat boxes, log piles, leaf piles and hedgehog houses, insect wall, insect boxes or bee bank, as well as the retention and enhancement of boundary buffers including native tree, shrub, and wildflower margin planting. All details on exact locations and specifications must be added to all working plans and will become an enforceable part of the planning permission to avoid oversight and to ensure consistency and enforceability.

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

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.

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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