

EB1.6 – Bat surveys

Wiltshire Wildlife Trust (WWT) was asked to comment on the REP1A-069 submission.

REP1A-069's comment suggesting that bats are confusing solar PV panels for water and that the panels are acting as sensory traps is supported by WWT. The impact on bat foraging behaviour that solar panel installation can have is referenced in WWT's original response to the proposed development (submitted to info@limesdownsolar.co.uk on 13th March 2025) in the second paragraph under the subheading 'Bats'.

REP1A-069's comment references one recent (<5 years old) scientific journal and one online article supporting their objection. Whilst peer reviewed scientific literature is currently limited, there is evidence to suggest that bat foraging is negatively impacted by solar developments, and the impact would be especially negative on bats in this development area due to its proximity to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).

Additional evidence can be found in the following scientific papers:

Baudouin, A., Hette-Tronquart, N., Brun, C., Gay, N., Chartendrault, V. and Kerbiriou, C., 2026. Balancing renewable energy and biodiversity: Assessing solar farm effects on bat activity. *Biological Conservation*, 314, p.111661.

<https://doi.org/10.1016/j.biocon.2025.111661>

Barré, K., Baudouin, A., Froidevaux, J.S.P., Chartendrault, V., Kerbiriou, C., 2023. Insectivorous bats alter their flight and feeding behaviour at ground-mounted solar farms. *J. Appl. Ecol.* n/a. 408 <https://doi.org/10.1111/1365-2664.14555>

EB1.8 – Bird surveys

Wiltshire Wildlife Trust (WWT) was asked to comment on the suitability of the applicant's approach to breeding and wintering birds in the cable route corridor (CRC).

WWT supports Wiltshire Council's comment that given the lack of breeding and wintering bird surveys in the CRC the impact of the cable route construction on birds cannot be fully known.

According to the documents EN010168-000629-6.3 (paragraph 1.2.14) and EN010168-000632-6.3 (paragraph 1.2.17) no detailed wintering or breeding bird surveys have been carried out within the CRC. The applicant justifies this with the temporary nature of potential impacts and limited width (typically 25 m wide) of the area to be impacted by construction.

The justification that impacts are temporary and confined to a 25 m corridor is not sufficient to rule out significant effects on wintering or breeding birds. Linear infrastructure can result in disturbance effects extending well beyond the working width, particularly during sensitive breeding and overwintering periods.

In the absence of seasonally appropriate surveys, the applicant has not demonstrated that protected or notable bird species are absent, nor that disturbance would not result in offences under the Wildlife and Countryside Act 1981 or adverse effects on populations.

Without survey data, it is not possible to assess potential functional linkage to designated sites or to design appropriate, evidence-based mitigation. The ecological assessment is therefore incomplete and WWT therefore finds that the applicant's approach to breeding and wintering birds in the CRC is not suitable.

General

The applicant does not appear to have proposed any substantial mitigations in response to the concerns raised in WWT's original response to the proposed development. We therefore refer to WWT's original response and WWT's position statement on solar farms, below:

Climate change represents the greatest risk to nature's recovery and Wiltshire Wildlife Trust recognises the crucial role that solar energy must play in decarbonising our electricity supply and achieving Net Zero. Wiltshire Wildlife Community Energy ([WWCE](#)), develops community-owned renewable energy projects with the key objectives of using their resources to improve outcomes for nature and reduce carbon in Wiltshire. After servicing debts all profits go to benefit community projects which meet either or both of their core objectives.

Given the scale of the energy transition challenge, we understand that solar farms will need to be developed at commercial scale alongside an expansion of rooftop installations. However, we believe their placement and management should prioritise biodiversity, conservation and sustainable land use. We want solar farms to be established on brownfield sites or low-grade agricultural land where possible, minimising the impact on valuable habitats and wildlife. Furthermore, we encourage the incorporation of biodiversity enhancement measures into solar farm designs, such as wildflower meadows, conservation grazing, hedgerows, and tree planting, to create thriving ecosystems within and around the sites. This is what WWCE do with their solar arrays at Braydon and Chelworth and the new array at Silverwood School in Rowde.

We believe a balanced approach can be achieved where solar energy is generated, carbon footprints minimised and wildlife allowed to thrive. By carefully considering site selection, implementing biodiversity-friendly practices, and engaging with local communities, we ensure that our solar farms contribute positively to both our energy needs and the conservation of our natural environment. Wiltshire Wildlife Trust was the first Trust in the UK to form its own independent solar energy company on brownfield sites in Wiltshire. We continue to support Solar but only in the right place, being the right

size and serving nature as well as the local community. For more information, contact [WWCE](#).