

Flaxlands Solar: Outline Skylark Mitigation Plan

Project name Flaxlands Solar	Project number 60727989	Client Ampyr Solar Europe	Date April 2026
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1. Introduction

AECOM have provided ecological input, including Ecological Impact Assessment (EclA)¹ to the design and construction methodology of a proposed solar photovoltaic array and Battery Energy Storage System (BESS) (hereafter, the 'Proposed Development'). The Proposed Development will be located within land to the north of Royal Wootton Bassett, Wiltshire, hereafter referred to as the 'Site'. The boundary of the Proposed Development has altered since the start of the survey work for the Proposed Development in April 2024 and the Proposed Development now includes additional areas for the purposes of Biodiversity Net Gain (BNG). These changes and current concept design are described in Section 3.

A planning application (ref PL/2025/05830) was submitted for the Proposed Development in July 2025, comments from Natural England and Wiltshire Council were received on 18 September 2025 and 11 November 2025, respectively. Comments focussed on the Proposed Development within the Flaxlands Manor County Wildlife Site (CWS), which is located within the southwest and north of the Site, following feedback received the Proposed Development has removed all proposed solar photovoltaic arrays from the CWS. Comments were also raised regarding the presence of skylark *Alauda arvensis* territories within the footprint of the Site with additional information requested to demonstrate that sufficient mitigation measures are provided with regards to skylark to ensure that the local population is not adversely affected.

Meetings have taken place since receipt of these comments with both Natural England and Wiltshire Council. Meetings were held on 11 November 2025, 17 March 2026 and 02 April 2026. During these discussions it was agreed that further survey work was not required and an outline skylark mitigation plan would be submitted to Wiltshire Council, this document forms the outline skylark mitigation plan. During these discussions it was agreed that final details of the skylark mitigation and monitoring will be submitted post-consent following pre-construction skylark surveys.

The purpose of this outline skylark mitigation plan is to:

- Summarise the baseline status of skylark populations on Site identified by AECOM surveys in 2024¹;
- Identify potential impacts of the Proposed Development to skylark in the context of the current concept design; and,
- Provide an outline skylark mitigation strategy for the Proposed Development.

¹ AECOM (2025) Flaxlands Solar Farm Ecological Impact Assessment (EclA)

2. Breeding Bird Survey Results Summary

Surveys for breeding birds were completed by AECOM between April and August 2024, inclusive. This included six visits to walkover all habitats within the Site boundary, (as identified at the commencement of the project in April 2024), to identify the presence of breeding birds by a suitably experienced ecologist. The survey did not include two fields within the CWS in the southwest (identified as Fields A and B on Figure 1) which was outside the Site at that time.

The survey identified six skylark territories; these are identified as territories 1 to 6 on Figure 1. Territories 1, 2 and 3 are located within the north/west of the Site, within sheep-grazed modified grassland (see Photograph 1-Photograph 3, Section 6). Territories 4, 5 and 6 are located within the south/east of the Site within other neutral grassland (see Photograph 4-Photograph 6). It is understood that territories 4, 5 and 6 are within grasslands subject to occasional sheep grazing, though this is at a lower density than fields to the north of Flaxlands Lane.

For full details regarding the survey methodology and results, see the breeding bird survey report².

3. Updates to the Proposed Development Concept Design

As described above, the footprint of the Proposed Development has been subject to significant changes as the design has progressed since April 2024, with many of these changes been to minimise impact or provide a benefit to ecological features. The following section outlines changes to the Site boundary with reference photographs illustrating the status of the habitats within the Site boundary presented in Section 6.

The Site boundary increased in size to incorporate two fields in the south within the Flaxlands Manor CWS for the purpose of BNG (identified Fields A and B on Figure 1). These fields were identified as modified grassland during a National Vegetation Classification (NVC) survey by AECOM in July 2024³, Photograph 7 and Photograph 8 were taken during the NVC survey. As the Flaxlands Manor CWS is designated for the presence of lowland meadow grassland habitats, it was concluded that the restoration of these fields to lowland meadow priority habitat would provide appropriate opportunity for the Proposed Development to achieve BNG.

Prior to the submission of the planning application, three fields identified as lowland meadow priority habitats during the NVC survey undertaken by AECOM in July 2024⁴, were excluded from the concept design and Site boundary. These are in the north (Field D), south (Field E) and east (Field F). The grassland habitats within these fields are shown in Photograph 9 to Photograph 11. The Client also identified that a land covenant was in place which constrained the development of solar photovoltaic array in the west of the Site and an additional field identified as modified grassland was removed from the concept design and Site boundary (Field G; Photograph 3).

Following discussions with Natural England and Wiltshire Council around impacts to the CWS, two additional fields with planned solar photovoltaic arrays (Field H and Field I; Photograph 5 and Photograph 12) identified as other neutral grassland were excluded from the concept design, though these fields remain within the Site boundary there will be no solar photovoltaic arrays installed within these fields.

4. Impact Assessment

Due to the changes in the concept design, impacts to skylark territories 3 and 5 are avoided since solar photovoltaic array will not be installed within Fields G and H (as illustrated on Figure 1). Grassland habitats within these fields will be retained in their existing condition, and no solar photovoltaic arrays will be installed in these locations. Skylark territories 3 and 5 will be retained during construction and operation of the Proposed Development.

The concept design of the Proposed Development includes the installation of solar photovoltaic arrays within four skylark territories 1, 2, 4 and 6. As ground-nesting birds are likely to avoid nesting within solar farms⁵, there is potential for the Proposed Development to result in the loss of four skylark territories in the absence of appropriate mitigation.

² AECOM (2024) Flaxlands Solar Farm Breeding Birds Survey Report

³ AECOM (2024) Flaxlands Solar Farm National Vegetation Classification Survey Report

⁴ AECOM (2024) Flaxlands Solar Farm National Vegetation Classification Survey Report

⁵ Taylor, R., Conway, J., Gabb, O. & Gillespie, J. (2019) *Potential ecological impacts of ground-mounted PV solar panels*. Available online at <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.bsg-ecology.com/wp-content/uploads/2019/04/Solar-Panels-and-Wildlife-Review-2019.pdf>

5. Outline Skylark Mitigation Measures

The outline skylark mitigation strategy aims to maintain and managed available habitat for skylark to support a skylark population of at least the same size post development as was present prior to construction.

5.1 Skylark Mitigation Areas

Five fields will be retained within the Site boundary to support existing retained skylark territories and additionally to provide mitigation for any current territories displaced by the Proposed Development. These are described below with reference to Figure 1 and photographs provided in Section 6.

The skylark mitigation areas comprise five fields which will not be subject to installation of solar photovoltaic array (Fields A, B, G, H and I). Two of these (Fields G and H; Photograph 3 and Photograph 5) currently support breeding skylark and will be retained during construction and operation of the Proposed Development. These areas will be retained in their existing condition and remain suitable for breeding skylark. Precautionary working methodology will be followed to minimise the production of dust, noise and vibration to avoid disturbance impact to birds. As a priority, works will be scheduled at a suitable time to avoid the breeding bird season.

Field I (Photograph 12) was subject to breeding bird survey and was not identified to support a skylark territory at the time of survey². This area was considered suitable for breeding skylark in the early spring, though became unsuitable during the breeding season due to the growth of a tall sward of grass. The remaining two fields (Fields A and B; Photograph 7 and Photograph 8) were not subject to breeding bird surveys in April to August 2024, it is therefore not possible to confirm whether they currently support breeding skylark though the fields have grassland which could be suitable should the vegetation be managed appropriately.

The fields which will be retained within the Site boundary, which will not be subject to development and are not currently known to support breeding skylark (Fields A, B and I) are approximately 4 ha, 4.5 ha and 5 ha in size, respectively. Skylark territories are typically 0.25 to 2.0 ha⁶, therefore it is considered there will be sufficient area to support any skylarks displaced by the Proposed Development.

Four of the skylark mitigation fields (Fields A, B, H and I) are within the Flaxlands Manor CWS designated for the presence of priority habitat grassland, the grassland would be managed in an appropriate way to support breeding skylark whilst seeking to retain or enhance the grassland habitat condition. As skylark are known to breed within unimproved grasslands, including lowland meadows, it is considered that grassland could be managed to support skylark and achieve grassland condition aims for the CWS.

5.2 Outline Management Measures

Fields A, B, G, H and I will be subject to appropriate management to provide suitable and available habitat to support skylark territories during the construction and operation of the Proposed Development.

The grassland could be managed using measures such as, controlled, low-intensity grazing regime to keep the sward height short whilst allowing for grass and forb species to flower and set seed. Some areas may be left ungrazed to allow for successful skylark breeding attempts into the late spring and early summer. Alternatively, a mowing regime could be implemented and would avoid the skylark nesting period. Allowing meadows to grow into late summer will reduce the mortality risk of chicks, though the height of vegetation may require management to avoid becoming too overgrown for adults to have a clear line of sight. Should a suitable mowing regime be identified and implemented, it is recommended that seeds are allowed to set, to increase diversity of the grassland, though the arisings should be removed after a few days to ensure that the fertility of the grassland does not increase.

5.3 Skylark Pre-Construction Surveys – Update to Baseline

A comprehensive survey will be conducted for skylark prior to construction of the Proposed Development. The entire Site including the Proposed Development and mitigation areas will be subject to six visits, to identify the current number of skylark territories likely to be impacted by the Proposed Development and to finalise the mitigation approach based on the number of territories.

⁶ Wilson, J.D. & Browne, S.J. (1993) BTO Research Report No. 129: Habitat Selection and Breeding Success of Skylarks *Alauda Arvensis* On Organic and Conventional Farmland. British Trust for Ornithology, Norfolk.

The survey will include a habitat suitability assessment, during which an appropriately experienced surveyor will identify suitable habitat for nesting skylark and areas which are currently unsuitable but could be improved through habitat management.

5.4 Final Skylark Mitigation, Management and Monitoring Strategy

A finalised mitigation strategy for skylark will be produced based on and following the completion of the skylark pre-construction surveys. This will be implemented during the construction and operation of the Proposed Development to manage the retention of suitable and accessible habitat for breeding skylark and the population on Site. This will detail the habitat management measures that will be implemented as well as any monitoring requirements. The finalised mitigation strategy will be submitted to Wiltshire Council for approval in advance of the commencement of construction activities associated with the Proposed Development.

6. Photographs



Photograph 1. Sheep-grazed modified grassland in the north west of the Site (skylark territory 1)



Photograph 2. Sheep-grazed modified grassland in the north west of the Site (skylark territory 2)



Photograph 3. Sheep-grazed modified grassland in the north west of the Site (skylark territory 3). Field is subject to land covenant agreement and will not be developed (Field G).



Photograph 4. Other neutral grassland in the south east of the Site (skylark territory 4)



Photograph 5. Other neutral grassland in the south east of the Site (skylark territory 5). Field is within the Flaxlands Manor CWS and removed from the development area in February 2026 (Field H).



Photograph 6. Other neutral grassland in the south east of the Site (skylark territory 6)



Photograph 7. Modified grassland within the CWS incorporated to the south/west of the Site boundary for BNG (Field A)



Photograph 8. Modified grassland within the CWS incorporated to the south/west of the Site boundary for BNG purposes (Field B)



Photograph 9. Northern field (Field D) excluded from the Site boundary due to the presence of lowland meadow priority habitat



Photograph 10. South field (Field E) excluded from the Site boundary due to the presence of lowland meadow priority habitat



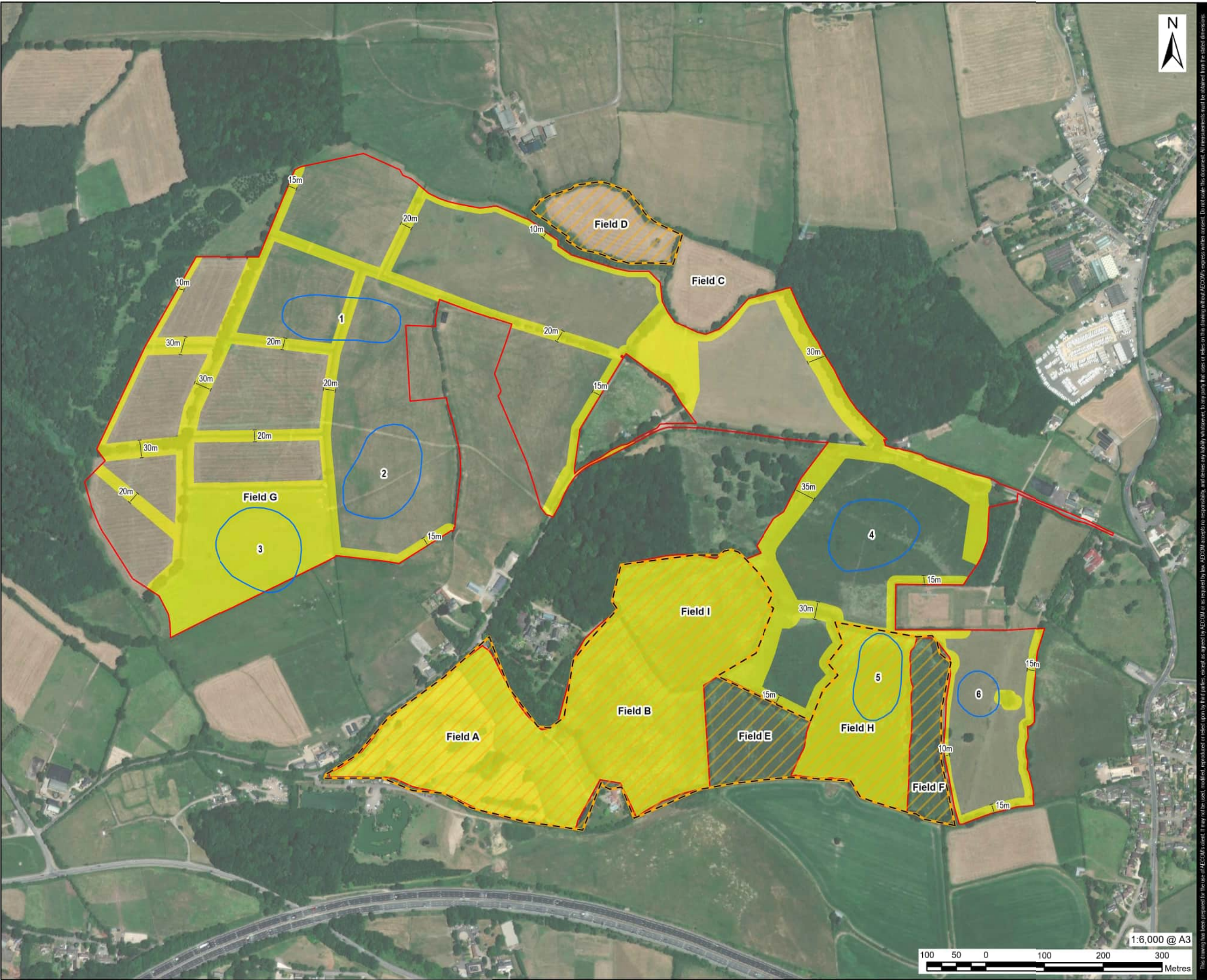
Photograph 11. East field (Field F) excluded from the Site boundary due to the presence of lowland meadow priority habitat



Photograph 12. Other neutral grassland within Flaxlands Manor CWS designation removed from development area February 2026 (Field I)

7. **Figures**

Figure 1. Skylark Mitigation Figure



AECOM

PROJECT

Flaxlands Solar Farm

CLIENT

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CONSULTANT

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LEGEND

- Ecological Assessment Area
- No working area
- Skylark Territories
- Flaxlands Manor Local Wildlife Site (LWS)

NOTES

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ISSUE PURPOSE

DRAFT

PROJECT NUMBER

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FIGURE TITLE

Areas to be left undeveloped

FIGURE NUMBER

Figure 1