Rosefield Solar Farm (EN010158)

Buckinghamshire Council's response to the Examining Authority's Second Written Questions

Buckinghamshire Council

June 2026

Introduction

This document sets out Buckinghamshire Council's responses to the Examining Authority's Second Written Questions (ExQ2), having regard to the material submitted by the Applicant and the Council's Local Impact Report and subsequent submissions.

The responses are provided to assist the Examining Authority in progressing the Examination by clarifying the Council's position on specific matters and identifying where further information, amendment or justification is required. In doing so, the Council has sought to engage constructively on technical matters and to provide proportionate commentary to support the Examination process.

Where no comment is provided in response to a particular question, the Council's position remains as set out in its previous submissions, including its Local Impact Report, Written Representation and earlier deadline submissions. The absence of comment should not be taken as agreement with the Applicant's response.

Comments are provided only where the Council considers that there is new or additional material arising from the Applicant's response, or where further clarification or emphasis is required to assist the Examining Authority.

Where matters were addressed during Issue Specific Hearings 1 and 2 (ISH1 and ISH2), the Council relies on the evidence given orally and as recorded within its post-hearing written submissions. Those submissions should be read alongside this document where relevant.

Unless expressly stated, the content of this document does not represent a change to the Council's overarching position on the Proposed Development. Where agreement is identified on particular technical matters, this should not be taken to indicate that the Council's overall concerns regarding the scheme have been resolved.

ExQ2	Question to	Question	Buckinghamshire Council Response
1. General and cross-topic Questions			
Q.2.1.1	Buckinghamshire Council	**Glint and glare** Please provide comments on the applicant's consideration of glint and glare as set out in the Glint and Glare Assessment **[APP-082].** Does the Council concur with the applicant's conclusions in the assessment that the proposed development will only have low impact on identified sensitive receptors (including roads and public rights of way), and that all effects would not be significant? If not, why not? The Council is also invited to provide comments on concerns raised by the Claydon Solar Action Group regarding glint and glare, including in its deadline 3 submission **[REP3-064]** as well as the applicant's response to issue specific hearing 1 (ISH1) action point 26 **[REP3-049]** on this matter.	In general, Buckinghamshire Council does not have the technical expertise internally or retained to provide a detailed review of the Applicant's Glint and Glare assessment. As such, the Council does not have the expertise to concur or disagree with the Applicant's assessment in this regard (or the comments provided by CSAG). However, the Council would invite further clarity on the Guidance applied in the assessment of effects. The Council notes, for example, that para 6.3.1 of **[APP-082]** would appear to imply that local roads are low sensitivity receptors. In that regard the Council note the submission of CSAG at para 4.43 of **[REP3-064]**. The Council consider the Guidance should be submitted to the Examination. If it is the case that local roads are considered low sensitivity for glint and glare, the Council would welcome a further explanation why that is given the potential safety effects on vehicular traffic.
2. Need, site selection and alternatives			
Q2.2.2	Buckinghamshire Council	**National Policy Statement (NPS) EN-1 (2025)**	The words of the policy state "…should be satisfied that the appropriate network connection

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		At ISH1, the applicant [REP3-049] drew attention to paragraph 4.11.12 of NPS EN-1 (2025) which states that "The Secretary of State should be satisfied that appropriate network connection arrangements are/ will be in place for a given project regardless of whether one or multiple (linked) applications are submitted." The applicant considers that this has been met in relation to both the solar and BESS as it currently benefits from a grid connection agreement for both the solar and BESS elements, albeit subject to ongoing industry-wide reform. The applicant also considers that the "relevant test is whether there is a realistic prospect of a grid connection, rather than certainty." To Buckinghamshire Council: 2. Does the Council agree with the applicant's interpretation of paragraph 4.11.12 of NPS EN-1 (2025) that the test is one of demonstrating that there is a realistic prospect of a grid connection?	arrangements are/will be in place…". The Council consider the words "realistic prospect of a grid connection" is a gloss on that wording. The question asks the ExA (and ultimately the Secretary of State) to come to a judgment on whether there is or will be an appropriate network connection. That is an exercise of judgment based on the evidence available. That evidence does not need to be conclusive, but it needs to be enough that the ExA they can conclude the "appropriate" and "are/will be" tests is met. The gloss "realistic prospect" appears to weaken the test in the words of the NPS. As to the evidence currently available, it appears to the Council that the ExA should take into account the connection agreement now, but should also take into account the industry-wide reform. The ExA should also take into account the evidence produced by the Applicant that indicates it will in the future benefit from a Gate 2 offer for the PV aspect of the Proposed Development, but a Gate 1 offer for the BESS aspect of the Proposed Development. The ExA will need to consider, in the context of the Proposed Development, whether that Gate 1 offer is an "appropriate network connection arrangement" and/or

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			whether an "appropriate network connection… will be in place" for the Proposed Development.
Q2.2.3	Buckinghamshire Council	**Location of the BESS** To all parties: Please provide comments on the applicant's response to action point 7 from ISH1 [REP3-052] that sets out its position on why fields E10 and E11 are an unsuitable location for the BESS. Has the applicant provided sufficient justification for not proposing the BESS in fields E10 and E11? If not, what further information should the applicant provide?	Having considered the Applicant's latest response, the Council has reviewed its position in relation to the BESS. The Council accepts that there are clear constraints affecting Fields E10 and E11 and understands why these areas have not been taken forward for BESS development. However, this does not alter the Council's concern about the inclusion of a BESS within the scheme as a whole. The additional material reinforces that the BESS is a substantial, engineered and potentially noisy form of development, the effects of which extend beyond the immediate site and into the surrounding rural landscape. The Council considers that the introduction of a BESS here would contribute to the industrialisation of the countryside in this location. This is particularly the case when viewed alongside the concentration of existing and proposed energy infrastructure in the vicinity of the substation, including other grid-scale BESS projects. The Council considers that there is no

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			clear justification for introducing this type of infrastructure into the wider countryside when similar facilities are coming forward around the existing substation with established grid infrastructure. Accordingly, whilst the Council accepts the Applicant's reasoning as to why certain fields are unsuitable, it maintains its objection to the BESS on the basis that its impacts are not confined to site-specific constraints and that it represents an industrialising addition to the rural landscape.
3. Air Quality			
Q2.3.3	Buckinghamshire Council	**Peak year of construction** The latest statement of common ground [REP3-016] between you and the applicant indicates that there is a single outstanding issue to be agreed – peak year of construction traffic with the air quality assessment stating 2029 and the traffic assessment March 2030. The Council indicated at ISH1 that this issue has been resolved. Please confirm that this is the case or otherwise. Does the Council have any outstanding air quality issues?	Buckinghamshire Council confirm that this matter has been resolved.

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5. Biodiversity and Ecology			
Q2.5.18	Buckinghamshire Council	Ground nesting birds How do you respond to the applicant's case set out at 2-4 of [REP3-016] that mitigation at a ratio of 2:1 for habitat loss is not required?	The request for skylark mitigation plots at a ratio of 2:1 in respect of identified breeding pairs on site has long been established in Buckinghamshire and was based on research carried out to support the agri-environment grants provided to landowners on enhancement projects for this species. This 2:1 approach has been adopted across all development types within Buckinghamshire. The Rosefield application has calculated 39 breeding pairs will be impacted. This was based on the area of solar panels within suitable breeding territory. Specific Skylark compensation areas are proposed within the site and are referenced in the outline LEMP. Clarity on these areas and what they comprise of will be needed to fully justify not adopting the 2:1 ratio. The Council acknowledges skylark plots are not the only means to encourage breeding on sites. Alternative mitigation approaches such as meadow grassland creation, set-aside, spring sown crops and maintenance of uncultivated field margins can be beneficial. Critical to all these is

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			maintaining open sightlines required by the species. Concerns have been raised by Claydon Solar Action Group on the site identified as the main skylark compensation area being unsuitable due to the topography of the site. It is understood the applicants' ecologists are providing further comment on this and we await this detail. For the Council to be assured sufficient compensation is being provided and to accept the applicants approach, details of the measures proposed will be required. The compensation areas proposed will be providing other wider ecological gains, particularly in reference to Bat mitigation. The applicant has assumed that the areas identified for ground nesting bird compensation will be managed optimally for ground nesting birds. However, these areas are also being used as mitigation for bats and other wildlife which is likely to reduce the capacity of the areas for ground nesting birds, requiring a greater area overall where mitigation is combined. For example, the bat mitigation requires longer

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			timescales of cattle grazing, whereas ground nesting birds would favour a shorter, later window of grazing after the breeding season to avoid nests being trampled. The applicant has indicated this will be provided within the LEMP which will be secured with a condition. The council would prefer this species-specific aspect of the Outline LEMP [APP 7.6 paragraph 5.4.21.] being updated with more specific detail to explain how the areas will be managed for multiple features and how this impacts the assumptions regarding the overall area of land required for compensation.
5.2 Biodiversity Net Gain			
Q2.5.21	Buckinghamshire Council	**Rosefield Solar Farm BNG Statutory Metric** Please provide your comments on the applicant's BNG metric [REP3-025] and confirm whether you consider the methodology and calculations to be accurate.	The Council had a discussion with the applicant regarding the BNG methodology on 3/06/2026 and we understand that the applicant intends to update the calculations and report/methodology by deadline 4.
6. Compulsory acquisition, temporary possession and other land or rights considerations			

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Q2.6.2	Buckinghamshire Council	**Compelling case in the public interest test** Section 122 of The Planning Act 2008 requires the Secretary of State to be satisfied that there is a compelling case in the public interest for land to be acquired compulsorily. Paragraph 14 of The Planning Act 2008 guidance related to procedures for the CA of land states that "In determining where the balance of public interest lies, the Secretary of State will weigh up the public benefits that a scheme will bring against any private loss to those affected by compulsory acquisition." If it is demonstrated that the proposed development may impact medical supplies to the National Health Service (NHS), should the Secretary of State also take account of any related public disbenefit as well as private loss when weighing against public benefits in determining if there is a compelling case in the public interest for the CA of Preston Farms Limited's interests?	The Council considers that any public disbenefit should be weighed in the balance. That is because (1) the overarching test is "determining where the balance of public interest lies", which implies a balancing act generally; and/or (2) the "public benefits" should properly be interpreted as meaning the net "public benefits" (i.e. the benefits minus the disbenefits). Not weighing the public disbenefits risks an assessment of the public interest which does not reflect the reality of the proposed CA.
7. Cultural Heritage			
Q2.7.5	Buckinghamshire Council	**ES Chapter 9 – operation phase** Elaborate on the apparent concern identified in your comments on deadline 2 submission [REP3-053] regarding the applicant's consideration of effects during the operation stage in ES Chapter 9 [REP2-027] in which you	The Council has since noticed that there are operation phase impacts mentioned in the summary and that this comment was made in error for which we apologise, and should be ignored. There is also assessment of individual heritage assets for construction in paragraphs

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		state "In Table 9.15 "Summary of heritage assessment" construction and decommissioning activity is mentioned. Operation is not, although it is assessed for individual heritage assets in paragraphs 9.10.55 to 9.10.108."	9.10.2 to 9.10.54 and for Decommissioning in paragraphs 9.10.109 to 9.10.162. There is additional assessment in REP2-047, Annex D, which includes the most detailed assessment of impacts..
Q2.7.6	Buckinghamshire Council	**Interpretation boards** Provide an update on any discussions that have taken place regarding the provision of interpretation boards for built heritage and the historic landscape.	This was discussed further at a meeting between the Council and the Applicant on 05/06/26 and again on 12/06/26. They are currently proposed on PRoW within the Scheme limits. Specific locations were discussed. The council agrees with the applicant that the interpretation boards could be delivered through the more detailed LEMP, identifying specific locations and content relating to specific heritage assets as well as general history, secured through text included in the OLEMP.
8. Cumulative Effects			
Q2.8.2	Buckinghamshire Council	**ES Chapter 17 (Cumulative effects) – assessment methodology** In response to the Examining Authority's (ExA) written question 1.11.2 [REP2-090] regarding the acceptability of the applicant's assessment of cumulative effects on the highway network, you indicated that the methodology was generally acceptable but there were locations across the highway network where significant constraints mean that relying on a percentage increase in traffic was not always appropriate. Please explain your concerns. Has the applicant	The applicant has addressed the concern of cumulative highway impact at the key junction of concern, being the A41/Station Road. The approach of considering overall percentage changes to movements at a junction can mask large or significant changes to particular arms of a junction if the primary arms have a high flow rate and side arms have low numbers of movements. Therefore it is necessary to consider the changes to each arm on such junctions before concluding that there is an impact that is not consequential enough to require mitigation.

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		since addressed this issue? If not, what further action would you recommend the applicant takes to satisfy you on this point?	
Q2.8.4	Buckinghamshire Council	**ES Chapter 17 (Cumulative effects) – assessment methodology** In your response to the ExA's written question 1.11.30 [REP2-090] you maintained your concern at the way cumulative effects are discounted on the basis that other existing or approved developments are assumed to be fully mitigated with residual effects treated as not significant before combined assessment is undertaken and that this places reliance on anticipated mitigated outcomes rather than robustly testing whether the combined presence of multiple developments gives rise to cumulative harm. Has the applicant since addressed this issue? If not, what further action would you recommend the applicant takes to satisfy you on this point?	The Council maintains its concern regarding the approach taken to cumulative effects, whereby other existing or approved developments are assumed to be fully mitigated, with residual effects treated as not significant before the combined assessment is undertaken. This approach places considerable reliance on anticipated mitigation outcomes, rather than testing the realistic scenario in which multiple developments, each with residual effects, are experienced together. The Council considers that this risks underplaying the combined effect of multiple schemes, particularly where they are located in close proximity. The Applicant has not substantively addressed this concern. The assessment continues to treat developments on a largely isolated basis before combining them, rather than fully interrogating the potential for overlapping and reinforcing effects.

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			To address this, the Council considers that the Applicant should adopt a more precautionary and effects-based approach. This should include testing a scenario in which the residual effects of individual developments are brought together without assuming optimal mitigation performance in all cases, and explicitly assessing how the combined presence of multiple schemes is experienced by receptors. In particular, greater emphasis should be given to the interaction, extent and perception of combined effects, rather than concluding that cumulative effects are not significant simply because individual developments are assessed as acceptable in isolation.
Q2.8.5	Buckinghamshire Council	**ES Chapter 17 (Cumulative effects) – assessment methodology** In the latest draft statement of common ground between you and the applicant [REP3-016] there is still an outstanding area of disagreement with respect to the classification of effects as temporary or permanent over the 40 years of the operational life of the proposed development. Would you please explain your	The Council's concern relates to the classification of effects as "temporary" over the 40-year operational life of the proposed development. Whilst the development is time-limited in consenting terms, a 40-year duration represents a very substantial period in planning terms.

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		concerns? What do you consider to be the potential consequences of this difference in approach? What more could the applicant do to satisfy you on this point?	For many receptors, this would equate to an effect experienced over two generations and, for some individuals, for the remainder of their lives. In that context, the distinction between temporary and permanent becomes largely semantic and does not reflect the lived experience of those affected. The Council is therefore concerned that the current approach risks understating the magnitude and weight of effects, particularly in relation to landscape, visual amenity and the character of the countryside. Effects of this duration are more appropriately understood as long-term and enduring, even if not permanent in a strictly technical sense. The consequence of this approach is that it may skew the assessment of significance and the overall planning balance, by reducing the apparent weight attached to what are, in practice, lasting changes to the environment. This is of particular concern in the cumulative context, where multiple developments of similar duration

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			may combine to result in an enduring transformation of the landscape. The Applicant has not substantively addressed this issue and continues to rely on the temporary classification without recognising the functional permanence of the effects over the operational life. To address this, the Council considers that the Applicant should explicitly acknowledge where effects persist for the full operational period and assess these as long-term effects, with appropriate weight given to their duration. The cumulative assessment should also reflect the combined long-term presence of multiple schemes, particularly the consented and proposed energy developments in the vicinity.
Q2.8.6	Buckinghamshire Council	**ES Chapter 17 (Cumulative effects) – assessment methodology** In the latest draft statement of common ground between you and the applicant [REP3-016] there is still an outstanding area of disagreement with respect to the need for a cumulative assessment of the combined losses of arboriculture features across multiple	The Council's earlier concern related to combined arboricultural losses and pressures across the Proposed Development and other relevant schemes. The main remaining example is the relationship with HS2 mitigation land around Decoypond Wood.

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		schemes. Has this now been resolved? What is the latest position?	The Applicant's explanation that the HS2 mitigation issue is to be addressed through separate land arrangements is noted. However, the Council does not yet consider the matter fully resolved until the formal HS2 confirmation is provided and the relationship between HS2 mitigation, replacement mitigation land and Rosefield's own buffer/mitigation framework is clearly evidenced. The Council consider this should be provided and will comment on it when this is available.
Q2.8.7	Buckinghamshire Council	**ES Chapter 17 (Cumulative effects) – assessment methodology** In your response to the ExA's written question 1.11.31 [REP2-090], you maintain that the applicant has not provided sufficient project design detail to inform the direct and cumulative impact assessment for agricultural land classification and soils. Has this now been resolved? What is the latest position?	The Council's concerns remain as the applicant has not provided any numerical breakdown of land use impacts. This could be done in Table 12.12 by including hectare breakdown for each impact. The Council's concerns related to the lack of detail on the wider impact of the ALC land loss remain. The applicant has avoided any detailed assessment of direct and cumulative ALC land loss, based on the low amount of BMV land involved. The discussion at the recent hearings highlights the site-specific nature of some ALC land loss impacts. The current use of some of land and the surrounding land for specialised ALC outputs such as blood products for the NHS is a relevant factor in the ALC assessment and in the cumulative impact assessment.

ExQ2	Question to	Question	Buckinghamshire Council Response
Q2.8.9	Buckinghamshire Council	**ES Chapter 17 (Cumulative effects) – construction of the proposed development** Is it still the Council's view that the cumulative effects of construction would be significant and construction programmes should be staggered to mitigate them?	The Council's position is that there remains the potential for cumulative effects to arise during the construction phase, particularly where activities from multiple schemes overlap in time and affect the same parts of the network and surrounding area. The Council recognises that construction effects are temporary and that mitigation measures can be secured through construction management plans. However, the effectiveness of those measures is likely to depend on the degree of coordination between different schemes, which cannot be assumed in all cases. In this context, the Council's concern is not that significant effects would inevitably arise, but that there is a risk of cumulative impacts occurring if construction activities are not carefully managed, particularly in relation to traffic movements and associated disruption. The Council therefore considers that cumulative construction effects would need to be managed proactively and with appropriate flexibility,

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			including monitoring and coordination where overlaps in construction programmes occur. Overall, the Council maintains that, whilst the impacts can be mitigated, this is contingent on careful management and coordination, and there remains a need to ensure that appropriate mechanisms are in place to address cumulative effects should they arise.
9. The draft Development Consent Order (dDCO)			
Note: questions/ comments below relate to dDCO Rev 5 [REP3-006] (clean)/ [REP3-007] (tracked)			
9.1 Articles			
Q2.9.10	Buckinghamshire Council	**Article 5. Power to maintain the authorised development** Is the Council content that the wording of article 5(3) means that the power to maintain the authorised development is limited so as not to authorise "the carrying out of any works which are likely to give rise to any materially new or	The Council is content.

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		materially different effects that have not been assessed in the environmental statement"?	
Q2.9.11	Buckinghamshire Council	**Articles 8. Street works, 9. Application of the permit scheme, 10. Power to alter layout, etc., of streets** Is the Council content with the applicant's revised wording of article 9, which applies the permit scheme to street works and the power to alter layout, etc., of streets (articles 8 and 10 respectively) and these works as a result would have adequate notice periods?	
Q2.9.12	Buckinghamshire Council	**Article 12. Temporary prohibition or restriction on use of streets and public rights of way** Is the Council content with the applicant's explanation in [REP3-050] of how existing provisions within the outline Rights of Way Strategy [REP2-071], and outline Construction Traffic Management Plan (oCMTP) [REP2-065] combined with a proposed update of the oCMTP at deadline 4 to include a new broader commitment specifically referencing article 12, would ensure streets and public rights of way used in the construction of the proposed development would be restored to their original condition?	Subject to seeing the amended version as submitted, this is accepted both by reference to PRoWs and highways.
Q2.9.14	Buckinghamshire Council	**Article 16. Agreements with street authorities** In response to the ExA's written question 1.12.9 [REP2-090] you suggested amended wording for article 16. Agreements with street authorities,	The Council is satisfied with the wording of the CTMP

ExQ2	Question to	Question	Buckinghamshire Council Response
		which would provide safeguards against works that did not meet adoptable standards. At ISH2, it was noted that the applicant had sought to address this issue by providing amended wording in the outline Construction Traffic Management Plan (oCTMP) [REP2-065] and discussions between the parties would continue. Are you content with the proposed wording in the oCTMP? If not, what wording do you propose for either article 16 or the oCTMP?	
Q2.9.16	Buckinghamshire Council	**Article 22. Compulsory acquisition of land** Are you content that article 22 does not explicitly confirm that compulsory acquisition powers do not extend to mines and minerals as article 48. Compulsory acquisition of land – incorporation of the mineral code, already achieves this?	The Council is content save to note that Article 48 does not incorporate certain interpretive parts of Part 1 of Schedule 2 to the Acquisition of Land Act 1981. The Council would invite the Applicant to include Schedule 2, Part I paras 1(2), 1(3) and 1(5) in Article 48.
9.2 Schedule 2 – Requirements			
Q2.9.19	Buckinghamshire Council	**8. Fencing and other means of enclosure** Is the Council content with the amended wording of requirement (R) 8(6) and 8(7) of the draft Development Consent Order (dDCO) [REP3 006] submitted at deadline 3?	The Council is content.
Q2.9.20	Buckinghamshire Council	**14. Operational noise** Are you content that R14, the outline Construction Yes Environmental Management Plan (oCEMP) [REP3-030] and the oCTMP [REP2-065] would provide adequate control of operational noise in general and in particular noise associated with activities that would be	Yes oCEMP and oCTMP are considered sufficient to protect from a noise perspective.

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		undertaken in the hour either side of the proposed core working hours of 7:00am to 7:00pm Monday to Friday and 7:00am to 12:00pm on Saturdays and abnormal or emergency construction traffic movements, construction activities such as trenchless techniques (including horizontal directional drilling) and abnormal indivisible load deliveries, which may need to take place during evenings, Sundays, bank holidays or at night?	
10. Health and Wellbeing			
Q2.10.3	Buckinghamshire Council	**Health assessment – local businesses, local employment, agricultural displacement and tourism** In the latest statement of common ground between you and the applicant [REP3-016] you maintain that further assessment is required on the cumulative effects of the proposed development on local businesses, local employment, agricultural displacement and tourism. What is your response to the applicant's assertation that sufficient assessment has already been undertaken in ES (Chapter 14) – Population [REP2-033]?	The Council assumes this question relates to item 10-2 within the SoCG [REP3-016], which states that further assessment is required to consider local businesses, local employment, agricultural displacement and tourism. BC considers that this relates to all aspects of the population assessment, not just the cumulative assessment. The Council respectfully disagrees with the Applicant's assertion that sufficient assessment has already been undertaken and reported in the Population assessment [REP2-033]. The discussions at Issue Specific Hearing 1 (ISH1) covered specific circumstances of a small number of individual businesses (agricultural and local businesses). The Council considers the points raised at ISH1 are illustrative of the broader

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			concerns that BC has about the level of detail that is supplied within the Population assessment [REP2-033]. The reporting groups multiple businesses into combined receptor groups for which a single set of assessment inputs is produced - i.e. one sensitivity, one impact magnitude and a generalised mitigation reference, then leading to a single residual effects assessment. Beneath this the Applicant has alluded to a greater depth of individualised analysis, design refinement and targeted mitigation. However, the Applicant has not supplied this underpinning information in a transparent format either in the ES chapter or a supporting technical appendix. This leads to a concern that the approach dilutes the expression of the magnitude of impacts, with the Council keen to have clarity that targeted mitigation has been correctly developed, with agreement of affected receptors, to lead to an overall single summary conclusion of residual effects for each receptor cluster type. The Council is currently not satisfied that the evidence supplied supports the assertions of the Applicant regarding the agreement to mitigation and the level of significance of residual effects. The provision of supplementary material for each receptor that combines to form generalised

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			receptors (i.e. sensitivity, impact pathway, magnitude, mitigation and residual effects judgements, for each component of the receptor cluster), with explanation for the application of professional judgements would better enable the Council to satisfy itself that the application of the assessment does not artificially dilute higher sensitivities or greater magnitudes of impacts experienced by sub-sets of the receptor clusters. This would offer a means of confirming that the assessment has been undertaken with the rigour that the Council has requested; that all potentially significant effects have been duly considered, targeted mitigation is sufficient and that residual effects are in line with the Applicant's assertions. The above is relevant across not just the agricultural businesses (as per discussions at ISH1), but also the tourism, local employment and local businesses. There is an additional complexity for tourism, where the description of the value and sensitivity reported in [REP2-033] draws from cultural heritage, PROW and landscape and visual assessments. As discussed at ISH1, the Council has reservations regarding the sensitivity and value assigned within those contributing topics; with this uncertainty then permeating into the population assessment. The Council would

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			welcome the Applicant reviewing and more fully explaining the sensitivity assigned to tourism related receptors, alongside greater clarity of the way in which the Population assessment integrates the contributing topic assessment findings. The Council expects that this will become most beneficial to the quality and transparency of the assessment once consensus is reached that the issues the Council has raised regarding contributing assessments (i.e. cultural heritage value assessment, landscape and visual impact assessment sensitivities and PROW value and sensitivity) have been resolved. For all aspects and receptor types in the Population assessment, the Council would welcome the Applicant providing material to more transparently connect the individual receptor-pathway-mitigation and outcomes, particularly where there are highly tailored elements to the mitigation. Such information would be helpful as a supporting appendix to underpin the summary tables within the chapter.
11. Land and Groundwater			
Q2.11.1	Buckinghamshire Council	**Groundwater assessment methodology** The latest statement of common ground between you and the applicant [REP3-016] still shows there is a disagreement between the parties on the lack of assessment at this stage of	The Council acknowledges that the Applicant has committed to a detailed ground investigation and groundwater monitoring to confirm the suitability of the BESS location and inform detailed design. This will be secured via the CEMP and Drainage

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		the project of groundwater levels and flow direction particularly with respect to the battery energy storage system. Are you satisfied that provisions within Environmental Statement Chapter 11: Land and groundwater [REP1-038] and the outline Construction Environmental Management Plan [REP3-030] mean that groundwater would be investigated and any mitigation required implemented prior to construction?	Strategy. In addition, the Outline CEMP, Outline Drainage Strategy and Outline Battery Safety Management Plan have been updated to include detailed mitigation measures to address potential impacts on shallow groundwater. The Council accepts this approach and confirms that the updated documents are satisfactory. The ground investigation should be completed in adequate time to allow an interpretative report to be developed and any hydrogeological modelling completed for the site and specifically around the BESS to inform the detailed design.
12. Landscape and visual (including good design)			
Q2.12.1	Buckinghamshire Council	**Design Commitments** The applicant's response to the Examining Authority's (ExA) first written questions (ExQ1) Q1.15.3 [REP2-087] states that it does not consider that there is a need to reference any specific guidance, such as colour studies or studies of local buildings, to confirm colour choices at the detailed design stage. This is due to the relatively simple built forms of the proposed development and the provisions already included in the Design Commitments [REP2-010]. Is the Council satisfied that the Design Commitments provide sufficient detail and guidance to inform its approval of the	The information put forward in the Design Commitments [REP2-010] document is setting the parameters to be considered at detail design stage, these are accepted. It is essential that dialogue between the Applicant and Buckinghamshire Council is maintained throughout the detail design phase to ensure that where options for the choice of colours and material of a particular element of the Proposed Development for example: • The choice of material for the proposed acoustic barriers (D19), this is not specified. This will be a visible component within the landscape and careful

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		choice of colours for the development at the detailed design stage?	consideration of the choice of material will need careful thought and discussion with Buckinghamshire Council during the detail design phase to ensure that it is appropriate to its location and setting; • Perimeter fencing around the Rosefield Substation Satellite Collector Compounds, BESS and Main Collector Compound will be metallic or green in colour (D24), these two-colour options will have different effects depending on the exact location of each element as the introduction of these would result in a visible component within the landscape. Careful consideration of the choice of colour will need careful thought and discussion with Buckinghamshire Council during the detail design phase to ensure that it is appropriate to its location and setting. Whilst it is acknowledged that the Applicant has set out the design parameters, it is essential that discussions between the Applicant and Buckinghamshire Council have opportunities during the detail design phase (should the DCO be approved) to discuss and agree on the material and colour options provided.

ExQ2	Question to	Question	Buckinghamshire Council Response
Q2.12.4	Buckinghamshire Council	**Fields D28 and D29** To Buckinghamshire Council: 2. The Council is invited to elaborate on its position as stated in ISH1 [REP3-056] that there were medium or medium-to-long distance views of fields D28 and D29 when traversing the area by public rights of way and that the development would be noticeable even with mitigation.	There are five Public Rights of Way (PROW) that either traverse through fields D28 & D29 or pass around the perimeter to these two fields. These are listed as: ECL/8/2; QUA/38/2; QUA/40/4; QUA/39/1 and QUA/42/2 (the Bernwood Jubilee Way). From these PROW's views of the development would be visible, particularly from ECUL/8/2 which passes between field D28 and D29. These PROW's are part of a wider network where views would still be visible. The introduction of mitigation whilst reducing potential visual impacts would not eliminate these impacts and would therefore still affect the users of the PROW network.
Q2.12.5	Buckinghamshire Council	**Potential mitigation in the outline Landscape and Ecological Management Plan (oLEMP)** Is the use of the word "potential" mitigation appropriate in the oLEMP [REP2-067] to avoid any ambiguity around the certainty that mitigation would be provided? If not, provide an alternative description.	As the Council understands it, the oLEMP represents broadly all of the mitigation which is proposed and which the Council can require the Applicant to secure in the Detailed LEMP. As such, it is potential as whether all of it ultimately is required is a matter for the Detailed LEMP. However, the Council recognises a different wording would give the ExA security that the mitigation in the oLEMP would be secured. The Council also recognises that the existing wording could be seen as weakening the requirement to be "substantially in accordance" with the oLEMP (see draft DCO Req 7(2)). Thus, if the ExA are minded to require a firmer wording, the Council consider

ExQ2	Question to	Question	Buckinghamshire Council Response
			wording such as “mitigation to be delivered” should be included in substitution for “potential mitigation”. Flexibility will remain in the oLEMP due to the “substantially in accordance” test in the draft DCO.
13. Noise and vibration			
Q2.13.1	Buckinghamshire Council	**Background Noise** The Examining Authority (ExA) notes the continued concern of Buckinghamshire Council regarding the relative increase in noise levels to some receptors due to low background noise levels. The applicant explained at issue specific hearing 1 (ISH1) [REP3-049] that its approach in considering absolute noise levels is appropriate and consistent with other nationally significant infrastructure projects (NSIPs). The applicant also stated that it was not reliant only on the 35 decibel (dB) threshold specified in requirement 14 (operational noise) of the draft Development Consent Order (dDCO) [REP3-006] but that other measures in the outline Operational Environmental Management Plan (oOEMP) [REP3-032] would also manage noise. The oOEMP would be subject to approval by Buckinghamshire Council under requirement 12 of the dDCO. To Buckinghamshire Council:	Buckinghamshire Council acknowledges that the outline Operational Environmental Management Plan (oOEMP), secured through Requirement 12 of the draft DCO, provides a useful framework for the ongoing management of operational noise. In particular, the inclusion of measures such as final plant selection, detailed design review, and the ability to secure mitigation (e.g. acoustic enclosures, barriers, or layout adjustments) at the detailed design stage does offer a degree of flexibility and control that could assist in managing site-specific impacts. However, while these controls provide a level of assurance in managing absolute noise levels, the Council’s concern relates specifically to the relative increase in noise at receptors where prevailing background sound levels are particularly low. In such environments, even noise levels below an absolute threshold (e.g. 35 dB LAeq) can give rise to perceptible and potentially adverse effects due to the change from baseline conditions. This is consistent with established

ExQ2	Question to	Question	Buckinghamshire Council Response
		3. To what extent would the wider control measures in oOEMP that would be subject to approval by the Council provide assurance that the relative increase in noise from low background levels could be adequately addressed?	assessment methodology (e.g. BS 4142 principles), which recognises that context and character of noise are important considerations alongside absolute level. The Council considers that the oOEMP, as currently outlined, does not yet provide sufficient certainty that these relative impacts will be fully addressed in all cases. That said, the mechanism for approval of the oOEMP does provide an important safeguard. Subject to the inclusion of more explicit commitments, site-specific assessment at sensitive receptors, and a clear framework for verification and enforcement, the Council considers that the oOEMP could provide a more robust level of assurance.
Q2.13.5	Buckinghamshire Council	**Noise and vibration effects on livestock and related mitigation** In the absence of the consideration of horses, sheep and cattle as receptors in the noise assessment detailed in Environmental Statement Chapter 13 [REP1-040] how can the Secretary of State have confidence that the full range of likely significant effects have been identified and that outline mitigation measures identified by the applicant would be effective?	The Council does not have the technical expertise internally or retained to assess effects on horses, sheep and cattle. In any event, in the absence of such information in the Environmental Statement, there is no assessment for the Council to consider and review. This is a matter upon which both the applicant and Preston Farms Ltd and TCS Biosciences Ltd may be able to comment further on in the first instance. The Council will consider the responses.
14. Population			

ExQ2	Question to	Question	Buckinghamshire Council Response
Q2.14.7	Buckinghamshire Council	**Field E23** To the applicant, Buckinghamshire Council, Preston Farms Limited and TCS Biosciences Limited: 2. Do the potential benefits including of field E23 in Work No. 1 and Work No. 2 [REP3-005] such as the estimated 12.25 megawatt peak (MWp) generating capacity as cited by the applicant in response to ISH1 action point 32 [REP3-049] outweigh potential adverse effects? Provide reasoning having regard to relevant policy.	From the perspective of the Council the key difficulty is whether the Applicant has assessed the effects of the Scheme on the affected receptor accurately. In this specific instance, the discussion at ISH1 raised concerns that the impact magnitude and efficacy of mitigation in respect of resultant effects on Preston Farms Limited and TCS Biosciences operations may not be reflective of key sensitivities for the specific operation. It is acknowledged that TCS Biosciences is a unique operation in England and Wales, presented at ISH1 as having a key role in the UK health services supply chain. Subject to acceptance of the evidence provided regarding both the role of the operation and the way in which adverse impacts may manifest, this would need to be correctly factored into the assessment to enable a judgement to be formed regarding the relative benefits of power generation and adverse effects – direct and indirect – on the operation. Adopting a precautionary approach, the potential adverse effects could be experienced by the UK health services supply chain, with the potential to be notable at the national scale. Applying the precautionary principle, therefore, the Council would accept that there is a case for the 12.25MW of solar power generation to be excluded from field E23.

ExQ2	Question to	Question	Buckinghamshire Council Response
			Please refer to response to Q2.10.3, which sets out BC's broader position regarding the accuracy and transparency of the Population assessment provided by the Applicant [REP2-033].
Q2.14.9	Buckinghamshire Council	**Outline Employment, Skills and Supply Chain Plan** The Council is invited to provide comments on the Outline Employment, Skills and Supply Chain Plan as updated by the applicant at deadline 2 [REP2-077].	Overall, the Outline Employment, Skills and Supply Chain Plan articulates an acceptable approach to securing skills, employment and supply chain benefits. The Applicant's commitment to working with BC on the specifics of the approach is acknowledged and welcomed. The additional detail provided on transport and accessibility in point 3.3.3 is noted, but BC retain reservations over the extent to which residents, particularly those from more deprived areas of the county, will be able to access opportunities at the site. There are potentially a number of demands on the Education and Skills Fund, particularly should support with travel be drawn from this, in addition to other skills, employability and supply chain activity. We would ask that consideration is given to reviewing the level of funding proposed, particularly in future years based on the results of initial activity, potential increases in costs, future changes with partners and funding streams etc.
15. Soils			

ExQ2	Question to	Question	Buckinghamshire Council Response
Q2.15.1	Buckinghamshire Council	**Green and blue infrastructure** The applicant updated the worst-case scenario considered in Environmental Statement (ES) Chapter 12 Soil [REP2-031] at deadline 2 to include the maximum areas that have been assessed, including the Battery Energy Storage System (BESS) and satellite collector compounds. Should the worst-case scenario also reference the land take for the green and blue infrastructure (10 hectares) assumed to be permanent in the assessment? If not, why not?	The applicant's updated chapter at deadline 2 discusses the blue green land take, however the conclusions were not clear. It would be helpful if a numerical land use breakdown was included in the impacts table. The Council agrees the (10 ha) blue green urban land area design allowance should be assumed as being permanent land loss. Currently this is not the case, as detailed in paragraph 12.10.22, where it is stated that "Therefore, Green and Blue Infrastructure is considered temporary and potentially reversible". It is not the Council's understanding that the applicant was intending to include the BESS and compounds as permanent land loss. They are currently considered as temporary in ES. It seems that no permanent land loss is expected, but this is unclear from the assessment. Table 12.4 contains errors and cannot be interpreted.
Q2.15.3	Buckinghamshire Council	**Soil ecosystems** The applicant's response to the Local Impact Report (LIR) [REP2-085] states that soil ecosystem services have not been assessed in Chapter 12 of the ES [REP2-031] as it pre-dates the updated Institute of Sustainability and Environmental Professionals guidance - A New Perspective on Land and Soil in Environmental Impact Assessment published in January 2026.	It should be updated to include the "A New Perspective on Land and Soil in Environmental Impact Assessment" guidance because this was published in January 2022, not 2026 as stated by the applicant. Chapter 12 of the ES should use the guidance provided in this guidance document to assess the other soil services that may be impacted such as soil carbon, soil as a platform for landscape and

ExQ2	Question to	Question	Buckinghamshire Council Response
		The applicant has also updated Chapter 12 of the ES to clarify that soil structure is a more appropriate term for what is currently assessed in the ES. To the applicant and Buckinghamshire Council: 1. Should the Chapter 12 of the ES be updated to assess soil ecosystems in line with the updated guidance? If not, why not?	any specialised soil and ALC services that their assessment identified.
Q2.15.5	Buckinghamshire Council	**Soil handling** The Council's LIR [REP1-112] identifies concern regarding the trafficking of soil during the winter months. The applicant's response to the LIR [REP2-085] points to support from Natural England in relation to measures in the outline Soil Management Plan (oSMP) [REP2-069] regarding the handling of wet soil and that soil would not be worked when it is above the plasticity limit detailed in the oSMP. Is the use of plasticity limits as set out in the oSMP an appropriate means of controlling the handling of wet soil appropriate in lieu of seasonal restrictions? If not, why not?	Avoidance of soil handling when the soil is above plasticity limits is deemed a suitable means of controlling soil deterioration. It should be noted that currently the applicant has assessed soils on site as being at a medium risk of structural damage in the (oSMP) [REP2-069]. Other good guidance such as the IoQ would class the soil on site as being at a much higher risk of structural damage. The applicant is at risk of underestimating the sensitivity of the soils on site to structure damage by not identifying suitable mitigations such as a seasonal constraint and the use of trackways. A seasonal constraint (autumn and winter) should be considered to avoid this potential risk to soils as this will be when they are at a higher risk of being above their plastic limit. It is also recommended that the (oSMP) [REP2-069] secure the requirements of Section 3.1 by stating who would be responsible for ensuring this was

ExQ2	Question to	Question	Buckinghamshire Council Response
			implemented. The wording in section 3.2.4 should be changed to make it clear that handling soil above their plastic limits is not permitted and that soil plasticity testing must be done.
16. **Transport and access**			
Q2.16.1	Buckinghamshire Council	**Staff parking during construction** In relation to on-site staff parking during construction, the applicant's response to the Examining Authority's (ExA) first written question (ExQ1) Q1.19.6 [REP2-087] states that the "total number of parking spaces will be determined once the confirmed number of staff has been made (but will not exceed the assessed 600 employees stated in the assessment)." Should the outline Construction Traffic Management Plan (oCTMP) [REP2-065] make a clearer commitment to tie the number of spaces to the mode share? If not, why not?	The Council agree this should be linked.
Q2.16.2	Buckinghamshire Council	**Pedestrians, cyclists and equestrians** To the applicant and Buckinghamshire Council: 1. Is there any data available regarding the use of public rights of way (PRoW), permissive paths and the highway network in the study area of Environmental Statement (ES) Chapter 15	There is no counting data for numbers using the rights of way network by walking, cycling or horse riding in the study area.

ExQ2	Question to	Question	Buckinghamshire Council Response
		Transport and Access [APP-058] (including Station Road/Dewes Lane, Snake Lane/Fidlers Field and Granborough Road), by pedestrians, cyclists and equestrians? If so, please submit the data.	
Q2.16.4	Buckinghamshire Council	**oCTMP - mode share** At issue specific hearing 1, the Council indicated [REP3-056] that it would explore the coverage of the mode share in the oCTMP [REP2-065] with the applicant further. Please provide an update on discussions and update the oCTMP if appropriate.	This has been discussed with the applicant and updated wording to the oCTMP is expected at Deadline 4.
Q2.16.6	Buckinghamshire Council	**Traffic Management Group** The applicant's response to ExQ1 Q1.19.13 [REP2-087] states that it considers that the Traffic Management Group as proposed in the oCTMP [REP2-065] should be condensed to make the group focussed and to ensure actions occur quickly. Furthermore, the applicant considers that business and tourism interests should not be members of the group as they are already catered for through the inclusion of elected members and parish councillors, who as effective spokesmen and spokeswomen for their communities, can advise of any matters relevant for all groups. Do Buckinghamshire	The Council does not support the Applicant's suggested approach that elected members and parish councillors alone should represent business and tourism interests on the Traffic Management Group. While the Council acknowledges the Applicant's intention to maintain a focused and efficient group, it does not agree that elected representatives can sufficiently capture the range and specific impacts likely to arise for local businesses and tourism businesses. The Proposed Development could affect businesses during construction phase where traffic disruption,

ExQ2	Question to	Question	Buckinghamshire Council Response
		Council and relevant parish councils support the applicant's suggested approach that elected members would represent local business interests on the Traffic Management Group?	delays and route changes may directly influence tourism activity. Tourism and rural business interests represent distinct receptor groups within the assessment, and their inclusion within the Traffic Management Group would enable an informed and timely input on the practical impacts of traffic management measures. This is particularly important in locations where seasonal variation, visitor patterns and event-based activity require a more responsive and nuanced approach than can reasonably be conveyed indirectly through elected representatives. Accordingly, the Council considers that appropriate representation from business and tourism interests should be included within the Traffic Management Group. This need not undermine the efficiency of the group and could be addressed through proportionate and targeted representation, ensuring that relevant stakeholders are engaged where their interests are materially affected.

Solar Farms & Skylarks

June 2026

About us

Solar Energy UK is a leading trade association championing the full solar and energy storage ecosystem. Backed by our members, we bring together a dynamic, member-driven community of over 440 businesses and partners, from ambitious, forward-thinking SMEs to globally recognised brands.

As a non-profit, we're united by a forward-looking mission: to catalyse the collective strengths of our members to build a clean energy system for everyone's benefit.

RSPB

The RSPB supports the overall intent and direction of this paper in promoting a whole-farm approach and a range of mitigation measures for skylark conservation and we very much welcome this work in addressing the needs of this red-listed species in the context of solar development. We recognise the important role of solar power in helping us reach net zero and how this needs to be done in a way that also protects and restores nature. We highlight the importance of continuing to build the evidence base to better understand how different interventions perform across farming systems and to ensure that established approaches are appropriately reflected within a flexible, context-dependent mitigation toolkit.

Acknowledgements

Solar Energy UK would like to thank the many individuals and stakeholders who contributed to the development of this topic paper.

In particular, we are grateful to the following organisations for sharing their knowledge and experience as peer reviewers:

- Ben Secker, Department of Natural Sciences, Manchester Metropolitan University
- Charlotte Peacock, Arventus
- Dan Foy, Stantec
- Dominic Woodfield, Bioscan
- Harry Fox, Clarkson & Woods Ltd
- Luke Nelson, Wildlife Trust
- Paul Wilkinson, RSPB
- Sam Manning, RSPB
- Stuart Sharp, Lancaster Environment Centre, Lancaster University
- Tammy Smalley, Wildlife Trust

We also thank Solar Energy UK's Planning and Land Use Steering Group, Natural Capital Steering Group and Nationally Significant Infrastructure Project Forum for their time and valuable input.

Finally, we extend our sincere thanks to Howard Fearn of Avian Ecology for authoring this paper and for the considerable time and expertise dedicated to its preparation.

Please note that the paper and its contents do not necessarily represent the views of any of these organisations.

Executive Summary

This Topic Paper considers the relationship between solar farm developments, planning policy and the conservation of Skylarks (Alauda arvensis) in England. Its intended aim is to assist planning authorities, developers, and other stakeholders in making informed decisions on proposals that affect breeding Skylarks, particularly where a solar farm is proposed on an intensively managed arable location.

Skylarks are a red-listed farmland bird species of national conservation concern. Their population has declined markedly in recent decades, largely because of agricultural intensification, changes in cropping patterns, and the reduction of suitable nesting habitats. Against this backdrop, the expansion of solar energy across the UK's rural landscape has raised questions about potential impacts on Skylark populations, as well as opportunities for biodiversity enhancement.

Evidence from multiple research programmes—including a member journal piece published in the Chartered Institute of Ecology and Environmental Management 'In Practice' journal (Fox, 2022), Solar Energy UK (2023–2025), and the University of Cambridge (2025)—indicates that well-managed solar farms have the potential to play a positive role in supporting farmland biodiversity. Studies have demonstrated that sites managed for ecological outcomes often support higher overall bird abundance and species richness than adjacent arable farmland (e.g. Montag et al., (2016), Copping et al., (2025)). Although Skylarks are displaced from nesting within the footprint of solar arrays, the species continues to forage within and around these developments.

Skylarks are listed as a Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and are recognised as a priority species under the UK Biodiversity Framework. Combined with national and local planning policies, this legal status places a duty on Local Planning Authorities (LPAs) to consider avoidance, then mitigation measures, before planning consent can be provided. However, Natural England's standing advice on wild birds does not require complete avoidance of impacts, or for mitigation to be based on the number of breeding pairs potentially displaced from a development site, rather focus on 'no net loss of habitat'.

Appropriate mitigation and compensation measures have often comprised the establishment of Skylark plots. Within an arable landscape, Skylark plots have been demonstrated to increase productivity by at least 50%, whilst taking 0.3% of land out of production; however, plots can be challenging to implement over the operational lifetime of a solar farm development due to land costs and availability, with land-managers sometimes reluctant to commit to their provision over the relatively long period of solar farm operation. Alternative mitigations approaches include meadow grassland creation, set-aside or spring sown crops and the maintenance of uncultivated field margins, whilst maintaining open sightlines required by the species.

If properly managed, these approaches can provide long-term ecological benefits that extend beyond Skylarks, supporting a wide range of farmland birds and invertebrates. Many solar farms are located on intensively managed arable land; by reducing chemical inputs and promoting semi-natural vegetation cover, such developments can deliver a meaningful biodiversity uplift while continuing to serve their primary function as renewable energy infrastructure. This in turn can provide a meaningful contribution to Local Nature Recovery Strategies, through habitat and connectivity improvements. Solar developments differ from most other forms of construction in that they are reversible, low-impact, and capable of long-term ecological enhancement. When designed with nature in mind, and properly managed, they contribute to national objectives for both biodiversity recovery and climate mitigation.

This Topic Paper addresses a growing inconsistency in the treatment of Skylark impacts within solar farm planning decisions. While Skylarks are rightly recognised as a species of conservation concern, mitigation requirements are sometimes applied in a way that assumes complete habitat loss and necessitates pair-for-pair replacement. Current ecological evidence and planning policy do not support such a universal approach. This paper therefore reviews the available ecological evidence, relevant planning policy, and practical mitigation approaches in order to support proportionate, evidence-led decision-making.

Decision-makers should therefore consider impacts on Skylarks in this wider context, balancing localised loss of nesting sites against the significant ecological gains solar energy developments can potentially deliver.

Introduction

Solar energy is a central component of the United Kingdom's renewable energy transition. As the deployment of solar farms accelerates in response to national net-zero commitments and energy security priorities, increasing attention is being paid to their relationship with biodiversity.

Among farmland birds, the Skylark has become a focal species in planning discussions because of its ground-nesting ecology and conservation status. Questions frequently arise regarding whether solar developments lead to unacceptable impacts on breeding populations and what forms of mitigation or compensation may be appropriate.

This Topic Paper has been prepared to support consistent, evidence-based and policy-compliant planning decisions. It summarises the current understanding of Skylark ecology, reviews available research on biodiversity outcomes at solar farms, and discusses how planning policy can be applied proportionately in this context.

Solar Farms and Breeding Birds

Research into the biodiversity outcomes of solar developments has expanded in recent years. The annual Solar Habitat Reports, commissioned by Solar Energy UK (2023, 2024, 2025) indicate that well-managed solar sites host diverse assemblages of invertebrates, plants, and birds, including a wide range of species of conservation value (Solar Energy UK 2024).

Similarly, the University of Cambridge's Centre for Landscape Regeneration (Copping et al., 2025) explored bird populations on six solar farms in the East Anglian Fens, working with RSPB scientists. The research led by RSPB Conservation Scientist Dr Joshua Copping shows that, under certain conditions, solar farms can support higher abundances of some farmland bird species than intensively managed arable land. Those solar farms which were well managed consistently showed benefits for a broad range of species listed as of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. A Lancaster University thesis by Secker (2024), concluded that solar farm age was an important predictor of all bird species richness on solar parks, which was considered likely to be related to increases in structural diversity and habitat heterogeneity occurring over time as the solar farm matures. Secker also documents a case of Corn Buntings, another red-listed ground nesting farmland bird, successfully nesting within a sensitively managed solar farm (Secker et al., 2026).

The RSPB considers that there is growing evidence to suggest that solar farms can be beneficial to nature when they are not built on sites that are already important for wildlife, and notes that solar farms managed with nature in mind can boost pollinator numbers (RSPB, 2025).

These findings clearly demonstrate that solar farms can benefit farmland birds including multiple species of Principal Importance, and wider biodiversity increases, in intensively managed arable-dominated landscapes; however, conservation focused management is required to achieve positive outcomes.

Overview of UK Skylark Ecology, Population Status and Trends

The Skylark is widespread across the UK, traditionally linked to open farmland, meadows, and heathlands. Famous for its distinctive song, flight and cultural significance, the species has undergone major declines over the past half-century. Skylark numbers fell by around 60% between the mid-1970s and late 1990s, with slower declines continuing into the 21st century before a more recent levelling-off, with some modest regional upturns.

This prolonged population decline led to the species' listing on the UK 'Red List' of Birds of Conservation Concern (Stanbury et al., 2021). Despite substantial declines, Skylarks remain a familiar feature of the UK countryside, with an estimated 1.6 million breeding pairs in 2016 (Woodward et al., 2020). According to the most recently available report by the British Trust for Ornithology (BTO) (Heywood et al., 2025), numbers have increased by 9% during the past decade and almost 20% in the last five years in south-east England and the East Midlands. These figures buck the long-term trend, although the recent increases in England and Scotland are not mirrored in Wales, where there has been a 23% decline since 2016. he species nests on the ground in open habitats with short vegetation (20-50cm high) and clear visibility to detect predators. Skylarks favour open arable landscapes, uplands, and coastal saltmarsh, where breeding densities are typically highest, whilst intensively managed dairy and silage fields support fewer pairs.

Consequently, land management practices strongly influence local and regional Skylark abundance. Within arable landscapes, different crop-types support varying densities of Skylarks, meaning that abundance and breeding productivity are heavily dependent on crop variation and populations are forced to adapt to local agricultural rotation. There is some evidence that breeding pairs will relocate during a breeding season where crops have grown and rendered their early-season location unsuitable for later breeding attempts (Donald, et al., 2001).

Skylark chicks are fed almost exclusively on invertebrates, so breeding productivity is closely linked to the availability of insects. The 2023 'State of Nature Report' (Burns et al., 2023) identifies a substantial reduction in invertebrate populations, and these are greatest in regions with high cropland cover (Mancini et al., 2023).

Solar Farms and Skylarks

A study by Fox (2022), published in CIEEM's In Practice journal provided a succinct appraisal of the known and assumed impacts of solar farms on Skylarks, and included a prototype approach to mitigation. Fox noted that, while Skylarks are regularly observed on operational solar farms, nesting within the panel array has not been recorded. The shaded, fragmented, and enclosed environment beneath panels is thought to increase predation risk and reduce visibility, which are key factors influencing nest site selection. Consequently, most evidence supports the assumption that Skylarks avoid nesting directly within solar arrays and are therefore displaced from nesting in fields where panels are installed.

Nevertheless, solar farms are likely to offer foraging opportunities for breeding pairs in surrounding land, with observations of breeding birds using solar farm margins as a nursery confirmed in the UK (Montag et al., 2016; Secker, 2024). The conversion of arable land to managed grassland within a solar farm is likely to lead to increased invertebrate abundance and diversity, and therefore increased food resources for Skylarks, through both reduced chemical inputs and a more stable ground structure due to cessation of tilling activities.

Whilst there is no evidence of Skylarks nesting within solar arrays, they are consistently recorded foraging and displaying above or adjacent to solar installations. This indicates that solar farm sites can still offer foraging habitat for nearby pairs. Solar Energy UK's Solar Habitat 2025 report found that in 59% of surveyed solar farms, Skylarks were recorded exhibiting foraging behaviour within or immediately adjacent to panel arrays, providing evidence of the use of solar farms as a foraging resource. Secker (2024) noted six different Skylarks carrying food at two solar farms, all of which were observed during the late breeding season visit when Skylarks spent a higher percentage of their time foraging on solar farms. This indicates solar farms may supplement depleted food resources in the local landscape throughout the breeding season.

Legal and Policy Framework

This section briefly outlines the key legislative and policy context for consideration of effects on Skylarks in planning decisions in England. It is not intended to be a comprehensive statement of the legal or policy position for any particular planning process, which will require in all cases consideration of the relevant legislative context, together with planning policies relevant to that decision-making process. It describes matters that have general application across planning processes.

Under the Wildlife and Countryside Act 1981, it is an offence to (amongst other matters) intentionally kill, injure, or take any wild bird, or to damage or destroy the nest of any wild bird while it is in use or being built. Developers must therefore ensure that construction or operational activities avoid impacts on nesting birds.

Skylarks are listed by the Secretary of State under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as a species of principal importance for the conservation of biodiversity in England. That designation, together with relevant planning policy, require decision-makers to consider impacts on the species in planning and development control. They are also listed as a Red List species in Birds of Conservation Concern 5 (Stanbury et al., 2021).

The National Planning Policy Framework (NPPF)and National Policy Statements for Energy include national planning policy which addresses impacts on biodiversity and deliver measurable net gains.

Natural England's (NE) standing advice on wild birds (Gov.UK 2025) emphasises avoiding impacts where possible and implementing mitigation or compensation where necessary. Replacement habitat should ensure no net loss, maintain habitat connectivity, and support long-term populations. Whilst the NE standing advice sets out requirements, it is not straightforward to apply to the displacement of a ground-nesting species for which, in many locations, baseline populations are dependent on farming practice. That exercise is considered in more detail in Section 7.

Local Development Plans typically expand on national policy requirements by including specific policies for protecting priority species and habitats identified in emerging Local Nature Recovery Strategies through habitat and connectivity improvements.

Impact Assessment - Best Practice for Skylarks

Solar farms are often located on lowland agricultural land. Consequently, the potential for direct loss of nesting habitat is potentially significant and an application could be deemed to fail policy tests should development proceed without mitigation or compensation. Given the mobile nature of the species, and inter-annual population fluctuations due to crop rotation and farming practices, consideration of a 'development site-only' population should be treated with caution in impact assessment, especially where a development site is modest in scale, or numbers of Skylark pairs are low.

Whilst best practice ecological impact assessment should always be undertaken to determine site-level effects, a landscape-scale assessment of Skylark populations may be more ecologically meaningful, depending on the level of impact and scale of development.

Neither planning policy (at a national level) nor NE standing advice on wild birds requires a 'pair-for-pair' replacement within a proposed development site and nor is such a metric typically applied to other species of identical conservation status. Specific Skylark mitigation or compensation measures may not always be deemed necessary for small-scale developments when wider biodiversity impacts and enhancements are considered against policy. Impact assessments should seek to demonstrate that Skylark populations will be maintained at an appropriate geographical scale, through avoidance or proportionate and deliverable mitigation or compensation measures.

The cumulative effect of multiple small-scale developments has the potential to become ecologically meaningful, even for displacement of a low number of breeding territories. Planning decisions will typically require assessment of cumulative and in-combination impacts, and it is consequently appropriate to also consider populations at a broader geographical scale, especially where measurable population impacts are predicted.

When planning balance is considered, it is potentially relevant that solar farm developments typically achieve no net loss, and often a net gain, for Species of Principal Importance (Section 41, NERC Act 2006) priority farmland bird species when suitable conservation management measures are implemented. According to Copping et al., (2025), farmland bird species consistently found in greater abundance at solar farms managed for biodiversity ('mixed habitat') included a series of 'Red listed' Birds of Conservation Concern that are also designated as Species of Principal Importance i.e., with the same designated status as Skylark); for example Corn Bunting, Cuckoo, Linnet and Yellowhammer were all more common at solar farms than arable sites. So, whilst there may be displacement of Skylarks from breeding sites with the development of a solar farm, and which should be transparently presented in impact assessment, priority farmland bird species as a group can benefitted from well-managed solar farm developments. Copping et al., (2025) also notes that other 'Red-listed' and 'Amber-listed' farmland species found in greater abundance at mixed habitat solar farms comprised Greenfinch, Dunnock, Kestrel, Reed Bunting, Song Thrush, Stock Dove and Wren.

Determining Mitigation

Mitigation for a species that is widespread, sometimes locally abundant, and reliant on large, open farmland areas presents an inherent challenge for all developers of such sites. This applies not only to solar development, but also to other large-scale land-use changes such as housing and infrastructure projects where these are located on farmland.

The key to effective mitigation is understanding the species' ecological use of a site and assessing impacts at an appropriate geographic scale. Impacts should be evaluated against a meaningful population unit. The loss of a small number of territories may be locally noticeable but insignificant at district or regional scale, particularly in landscapes where crop rotation regularly alters habitat suitability.

Population data at a county level are available in some local bird reports and atlases; however, such data are rarely up-to-date and accurate information on county or district level populations cannot be consistently obtained. As examples, the 2019 publication 'the Birds of Shropshire' estimated at 14,000 pairs in 2011 (Smith, 2019), and the annual bird report for the same county classifies the species as 'Green-listed' (of least concern). Similar information is available for Norfolk, where the 2007 populations was estimated to be 25,000 to 30,000 breeding pairs (Taylor and Marchant, 2011). These figures are outdated but can provide some more localised context. At a very localised level, such as that within an individual planning application site, land management changes and particularly the rotation of crops are likely to be the main drivers in fluctuations of breeding pairs.

As outlined in Section 5, NE standing advice states that replacement habitat for displaced breeding birds should meet the following four criteria:

- No net loss of habitat
- Like-for-like replacement near to the original nest to provide a long-term home
- Alternative habitat that is better in quality or area than the lost habitat, and
- Maintained habitat connection to allow normal bird movement.

Each of these is considered in turn below with regards to Skylark ecology, mitigation opportunities and limitations.

No Net Loss of Habitat

Natural England's no-net-loss principle is central to biodiversity policy but requires careful interpretation for Skylarks and solar farms. It is unlikely that solar farms, like many other major development types located on farmland, can realistically achieve no net loss of breeding habitat. In most other forms of development, however, habitat loss is total and permanent, necessitating a stricter like-for-like replacement. In contrast, research shows that well-managed solar farms can continue to provide a foraging habitat for Skylarks where pairs are present in the surrounding area. In these circumstances, habitat within a solar farm is therefore partially retained, rather than lost entirely, so long as management is conservation focused.

Evidence suggests that breeding success in Skylarks is influenced more by resource quality (such as invertebrate abundance, vegetation height and structure) than by simple habitat area of arable cropland. For this reason, NE's guidance on creating alternative habitat that is better in quality or area than the lost habitat may provide a more appropriate framework for Skylark conservation in relation to solar developments.

Like-for-Like Replacement Near to the Original Nest

Skylarks are highly mobile and can relocate nesting areas annually as crops rotate. Given their short lifespan (approximately 2–3 years) and mobile nature, focusing mitigation strictly near to the original nest is neither practicable nor ecologically meaningful. Whilst on-site impacts should always be assessed, the over-arching aim should be to maintain favourable conservation status at a meaningful scale, which may be at district or county level. This means mitigation or compensation habitats, could potentially be delivered at some distance from a proposed development provided they contribute to sustaining district or county populations.

Alternative Habitat That Is Better in Quality or Area Than the Lost Habitat

Where pairs are present in the wider area, solar farms managed with permanent grassland are likely to provide a long-term foraging gain for Skylarks, albeit this is likely to be limited to the fringes of the solar farm development. The cessation of cultivation and agricultural-chemical inputs enables soil recovery and increased invertebrate diversity, improving food availability. Over an operational lifespan of 25–60 years, this produces a sustained ecological benefit, even if nesting habitat within the array is lost or reduced. Consequently, whilst solar farms displace breeding pairs from nesting within a development site, they can also provide an area of better-quality habitat for nearby retained pairs, potentially leading to increased breeding productivity. This can provide a reliable food resource for the operational lifetime of the solar farm, which is likely to be otherwise subject to changes in farming practices and market conditions.

Maintained Habitat Connection to Allow Normal Bird Movement

Skylarks exhibit high mobility, moving between foraging and nesting sites as conditions dictate. The open nature of solar farms, with grassland beneath and around panels, does not impede this movement. At ecologically meaningful scales, solar farms maintain habitat connectivity, allowing normal Skylark dispersal and foraging patterns across the wider agricultural landscape.

Approaches to Mitigation and Compensation

It has become common practice for solar farm applications to include Skylark mitigation, either in outline or detailed form. Typically, the scale of mitigation is based on the number of territories recorded during baseline surveys, with provision of nesting habitat for all or a proportion of displaced pairs. Mechanisms often involve either the delivery of 'Skylark Plots' on retained or nearby arable land, changes to les intensive management practices (typically spring sowing) or the creation of permanent meadow grassland with conservation-focused grazing. A combination of both is also commonly applied, and measures can be delivered within a development site (as mitigation) or outside the planning application boundary (as compensation), subject to appropriately secured planning controls.

Approach 1: Skylark Plots

Skylark Plots were first piloted at the RSPB's Hope Farm in 2001 and then rolled out as an agri-environment option (EF8 option in ELS) after a 3-year replicated trial proved that they were remarkably successful at boosting Skylark productivity in winter cereals. A Skylark Plot is a small undrilled or sprayed fallow patch created inside a field of winter cereal crop, designed to habitat for breeding Skylarks. However, Skylarks do not nest within the plots, rather the plots provide a valuable foraging area and enable the birds to access densely cropped fields from the ground (Fox, 2022). According to the UK government's Environmental Land Management Scheme (ELMS) action-sheet "AHW4: Skylark plots", the plots must be sited in large, open winter-cereal fields of 5 ha or more (Morris, et al., 2004). They should be located away from field edges, tramlines, poles or pylons (for example around 50 m or more from the boundary). Plots are most effective when each patch is at least 16 m^2 in area. Two plots per hectare in winter cereals is known to boost chick production; however there appears to be no published evidence with regards to numbers of plots per pair in a mitigation context, particularly when set against the 'no net loss of habitat' principle set out in policy and guidance.

Skylark Plots have been applied as mitigation for multiple solar developments, including both locally determined projects and Development Consent Orders (DCOs). These include projects in Essex (2024), Bedfordshire (2024) Lincolnshire (2023, 2024), South Cambridgeshire (2023) and North Yorkshire (2022), often at a nominal 2:1 ratio of plots to displaced territories. However, this ratio appears to be derived from government advice on agri-environment payments and therefore lacks an empirical foundation with regards to mitigation. Consequently, skylark plots can be valuable where feasible to adopt, but a cost-benefit assessment may inform where they can work best or where to deploy alternative and/or complementary measures that are beneficial to skylark conservation, such as managed meadow grassland, set-aside, and spring sown cereals. Moreover, it is questionable that Skylark plots can be aligned with other nature conservation objectives given the limited ecological value of most arable crops. Consequently, although plots can be valuable where feasible to adopt, their cost–benefit justification for long-term mitigation remains uncertain, and it is likely that conservation managed meadow grassland, set-aside, and spring sown cereals are more beneficial to Skylark conservation overall.

Approach 2: Meadow Grassland Creation and Alternative Cropping

The creation of meadow grassland outside the footprint of the panels is likely to be beneficial to Skylarks as it can provide a permanently (operational lifetime) reliable habitat; however, benefits will only be realised if the meadow supports a diverse sward and is managed following conservation principles. Where this can be achieved, pairs which nest within permanent grassland are likely to consistently have a higher number of breeding attempts than those in winter sown crops, and therefore potentially raise more chicks. Permanent meadow creation therefore provides stable, long-term conditions and supports increased invertebrate mass and a stable foraging resource. Where permanent meadow cannot be implemented and managed for Skylarks, spring-sown cereals and areas of set-aside offer suitable alternatives which are likely to boost breeding productivity levels above intensive arable land.
While it may not produce a quantified one-to-one replacement of territories, meadow creation, spring-sown cereal and set-aside align with accepted mitigation principles for other priority species (e.g., Linnet, Yellowhammer, Hedgehog and Brown Hare).

Published Mitigation Frameworks

Fox (2022)
Fox proposed a prototype mitigation strategy specifically for solar developments, quantifying breeding territories within and around sites to calculate compensatory land requirements. The method prescribes management actions such as Skylark Plots, uncultivated margins (for foraging), and low-intensity set-aside. Fox does not argue for mitigation of all breeding pairs, rather suggests that the user determines a relative percentage of breeding pairs for which mitigation may be considered. What degree of mitigation is used is up to the ecologist and the developer to judge. The Fox framework has informed several planning submissions in Lincolnshire and Norfolk (2022–2024), though published monitoring data are limited.

Arventus 'Skylark Metric' (2025)
This online metric standardises the calculation of Skylark impacts and mitigation benefits, aiming to provide transparency for planners and developers. It has been piloted on projects across East Anglia and the South-west (2024–2025). RSPB and Natural England have had sight of the metric and have thus far raised no significant concerns, although the approach is not yet peer-reviewed. It relies on cropping data and a combination of territory density by habitat type, derived from research and survey data where available and so builds on the approach set out in the Fox paper. It aims to quantify the increased carrying capacity (through increased breeding success/productivity) of birds in adjacent fields once the land within solar farms moves from the baseline habitat (often arable) to high quality grassland; the metric terms this the 'foraging uplift'. The metric also allows for 'off-site' mitigation land to be brought into the calculation, as needed. The metric calculates the potential displacement/loss of individuals and identifies where this falls below the uplift provided by any proposed mitigation. However, the metric does not specify what an acceptable displacement/loss of individuals may be. This should be determined on a site by site basis in consultation with the appropriate determining body.

Wider Ecological Benefits versus Losses

New ground-mounted solar development will usually involve changes to local habitat structures and land, albeit less so than most other forms of development and solar farms typically provide substantive habitat improvements. Whilst changes of habitat can lead to the displacement of ground-nesting birds, it simultaneously creates long-term opportunities for biodiversity enhancement when designed and managed sensitively. Planning decision makers should consider both the ecological impacts and the ecological benefits of a solar farm development.

Ecological Change and Habitat Function

The conversion of intensively managed arable land to permanent grassland under solar farm operation significantly reduces disturbance, chemical inputs, and soil erosion. This shift in land management supports increases in soil health, vegetation diversity, and invertebrate abundance, which together enhance ecosystem function. These outcomes contribute to the recovery of a wide range of declining farmland birds and other species.

Balancing Losses and Gains

Decision-makers should recognise that the effects of solar developments on Skylarks are not absolute habitat losses, but rather they can provide continued use for foraging by nearby pairs where present. While nesting will cease within land area used for the solar array itself, foraging and territorial behaviour frequently continues, at least within the margins of the development footprint.

This displacement of Skylarks and other species contrasts with permanent habitat losses associated with most built development types, where land ceases to function as a habitat of conservation value altogether. When combined with appropriate habitat management, solar farms are capable of maintaining, and in many cases improving, local overall ecological integrity for a wide range of species of conservation value.

Policy Compliance and Natural England Standing Advice

There is a no express legal or policy requirement for a pair-for-pair or like-for-like replacement of individual members of a species population through mitigation or compensation measures. Even in the case of Great Crested Newts or bats, which are protected by Annex 1 of the Habitats Directive and therefore given the highest level of international legal protection, there is no obligation for individual animal-for-animal replacement. Should this approach be applied to all species of Principal Importance, which includes numerous widespread birds and other animals, including Hedgehog, Brown Hares and Common Toads, it would be prohibitive to most forms of development. A like-for-like replacement of individuals is not an approach applied to other directly comparable species and other forms of development. As such, whilst it is appropriate for planning decisions to fully consider population impacts based on a site-level population, it does not follow that mitigation must be delivered on a pair-for-pair basis to ensure policy compliance.

Proportionate Decision-Making

Planning decisions relating to breeding bird impacts from solar farm developments should be proportionate, consistent, and aligned with the wider policy framework. Impacts on species of comparable legal and policy status should be treated consistently across different forms of development. Refusal of a solar farm development solely based on residual breeding Skylark displacement risks presents a narrow and disproportionate interpretation of policy, particularly where an application will lead to positive impacts on other species of identical status.

Proportionality should also reflect the characteristics of solar development itself. Ground-mounted solar farms are temporary, and reversible land uses that retain the underlying soil resource and generally involve limited ground disturbance. Over their operational life they can support significant ecological enhancement, particularly where land is transitioned from intensive agricultural management to low-input grassland and habitat mosaics. When considered alongside their role in climate change mitigation, solar farms can therefore deliver wider environmental co-benefits, including improved soil condition, pollinator habitat provision, and reductions in agrochemical inputs; all of which contribute to the objectives of the UK Government's Nature Recovery Green Paper (DEFRA, 2022). Decision-making should recognise both the limited and manageable nature of ecological effects and the potential for solar schemes to contribute positively to broader biodiversity and nature recovery objectives.

Recommended Considerations for Decision Makers

The relationship between solar farm development and Skylark conservation requires a proportionate, evidence-led approach that balances biodiversity considerations with our obligations on renewable energy targets for 2035 and the urgent need to decarbonise the UK's energy under legally binding net zero commitments. Decision-makers should assess each application within this broader context, ensuring compliance with national and local policy while recognising the ecological opportunities associated with well-managed solar farms. Given the number of variables that are possible with each individual project, it is critical to ensure a suitably qualified ornithologist has the relevant information to make a professional judgement on the level of mitigation and compensation required for a development, based on the local circumstances.

Robust and Relevant Baseline Information

To determine the value of a proposed development site for Skylarks and inform mitigation requirements, breeding bird surveys should be undertaken and crop rotation data obtained to enable the use of a metric approach. Breeding bird surveys of the development site are likely to be necessary, and these should ideally also cover proposed mitigation areas where practical. In some cases, access to surrounding land is not possible, or candidate mitigation areas may not have been identified or agreed at the point of survey. Where this is the case, cropping data and published research on average territory densities can be used to assist in identifying the Skylark carrying capacity of candidate mitigation areas.

Apply Consistency and Proportionality in Policy Tests

The effect of development on Skylarks should be considered consistently with those for other species of Principal Importance. Decision-makers should recognise that policy does not require the absolute avoidance of all individual-level impacts where these are recognised during impact assessment. Mitigation can be partial (in terms of numbers of individuals or pairs) without failing wider policy tests where wider biodiversity benefits are provided. In practical terms, this means that small-scale, localised displacements within a solar array do not automatically require mitigation, especially where broader population-level outcomes are maintained.

Interpret Natural England's Standing Advice Flexibly and Consistently

Natural England's standing advice on wild birds sets out the mitigation hierarchy of avoidance, reduction, and compensation. For all birds, this hierarchy should be interpreted considering the available evidence:

- Avoidance: Prioritise site selection to exclude areas of high biodiversity value, such as natural grasslands.
- Reduction: Incorporate design features such as open grassland areas, wildflower strips, and low-intensity management under and between solar arrays.
- Mitigation and Compensation: Deliver habitat creation or enhancement, either within or beyond the site boundary, that demonstrably supports Skylark foraging and breeding productivity.

Secure Long-Term Management and Monitoring

Where mitigation or compensation measures are required, LPAs should ensure that management commitments are secured for the operational life of the solar farm through an appropriate legally binding mechanism. Monitoring should be proportionate to project scale but sufficient to evidence continued compliance with planning requirements and any relevant biodiversity gain objectives.

Recognise Wider Ecological Benefits in Planning Balance Considerations

Decision-makers should evaluate Skylark impacts in the context of wider biodiversity and ecosystem service gains. Well-managed solar farms deliver:

- Long-term reductions in chemical inputs and soil degradation.
- Habitat creation for pollinators, small mammals, and other farmland birds, including many species with identical designated status as Skylarks.
- Landscape-scale enhancement of ecological networks, and
- Measurable contributions to Biodiversity Net Gain and Nature Recovery objectives.

Refusal of proposals based on breeding Skylark displacement alone is potentially disproportionate and inconsistent with the legal and policy framework, including Natural England's standing advice. Whilst it is fully recognised that Skylark populations must be maintained and recovered, effects must be balanced against the broader biodiversity enhancements delivered by solar farms, which are now demonstrated through independent research and recognised by conservation organisations.

Integrate Skylark Considerations with BNG and Nature Recovery Frameworks

Skylark mitigation for a solar farm can be designed as an integral part of a project's BNG commitments by embedding targeted habitat features that support breeding and foraging into the landscape design and long-term management plans. For example, establishing meadow managed specifically for conservation can support Skylark nesting and feeding, depending on scale and location. Beyond individual site obligations, aligning Skylark mitigation with emerging Local Nature Recovery Strategies (LNRSs) and wider nature recovery frameworks strengthens both local ecosystem resilience and strategic conservation priorities. In England, LNRSs map habitats and set local biodiversity priorities, and they are increasingly embedded in planning policy and the BNG system so that habitat creation in priority locations can attract enhanced biodiversity value. By situating solar farm habitat enhancements (e.g., grassland or wildflower areas beneficial to Skylarks and associated species) within or adjacent to LNRS-identified opportunities, projects can contribute to coherent landscape-scale nature recovery, support delivery of local biodiversity priorities, and ensure compliance with formal policy approaches under national and local environmental frameworks. This supports the policy emphasis on strategic-scale nature recovery and ensures that solar developments contribute meaningfully to local biodiversity priorities.

Conclusions

Solar farm development represents a form of land use that can deliver meaningful biodiversity enhancements when appropriately located, designed and managed. Evidence presented in this Topic Paper indicates that, although Skylarks do not nest within solar panel arrays, solar farms can continue to function as part of the wider agricultural habitat used by breeding pairs, albeit restricted to the margins of a panelled area. The transition from intensively managed arable land to permanent grassland beneath and around solar infrastructure can improve habitat structure, increase invertebrate abundance, and provide reliable foraging resources for breeding birds in surrounding areas; however, this is strongly dependent on habitat management within the solar farm, and the availability of nearby nesting locations.

National planning policy does not require the elimination of all localised ecological effects, nor does it mandate the direct replacement of individual breeding pairs. Instead, the policy framework emphasises proportionate mitigation. In this context, the displacement of Skylarks from nesting within solar arrays should be considered alongside the wider ecological outcomes associated with well-managed solar farm sites. Overall, solar developments should seek to safeguard and enhance the natural environment, and to identify opportunities for the conservation, enhancement and recovery of habitats and species of Principal Importance.

Whilst local level impacts must be fully assessed, mitigation measures must be proportionate and reasonable, so should focus on improving habitat quality and breeding productivity at an appropriate scale, rather than attempting to mitigate for all displaced territories. Conservation-managed grassland, set-aside, and low-intensity cropping regimes are likely to provide durable Skylark over a prolonged period. Where evidence is not yet available, an appropriate level of monitoring should be in place to develop a more robust evidence base going forwards.

Solar farms have the potential to contribute positively to farmland biodiversity. Decision-makers should therefore apply an evidence-led and proportionate approach that recognises both the manageable nature of Skylark impacts and the opportunities solar developments provide for long-term ecological enhancement within modern intensive agricultural landscapes.

References

- Arventus (2024). Skylark Metric. [accessed October 2025].
- Burns, F., Mordue, S., al Fulaij, N., Boersch-Supan, P.H., Boswell, J., Boyd, R.J., Bradfer-Lawrence, T., de Ornellas, P., de Palma, A., de Zylva, P., Dennis, E.B., Foster, S., Gilbert, G., Halliwell, L., Hawkins, K., Haysom, K.A., Holland, M.M., Hughes, J., Jackson, A.C., Mancini, F., Mathews, F., McQuatters-Gollop, A., Noble, D.G., O'Brien, D., Pescott, O.L., Purvis, A., Simkin, J., Smith, A., Stanbury, A.J., Villemot, J., Walker, K.J., Walton, P., Webb, T.J., Williams, J., Wilson, R., State of Nature Report 2023 (Technical Report TP25999, 2023), ccessed October 2025].
- BTO (2024) Skylark (Alauda arvensis). British Trust for Ornithology. Available at: [accessed October 2025].
- Cambridge University (2023) Centre for Landscape Regeneration: Solar Farms and Biodiversity Study. University of Cambridge, UK.
- Chamberlain, D. E., Wilson, A. M., Browne, S. J., & Vickery, J. A. (1999). Effects of habitat type and management on the abundance of skylarks in the breeding season. Journal of Applied Ecology, 36, 856–870.
- Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. Bird Study, 72(3), 217–222. [accessed October 2025].
- DEFRA (2022) Nature Recovery Green Paper: Protected Sites and Species. Department for Environment, Food & Rural Affairs.
- Donald, P.F., Buckingham, D. L., Moorcroft, D., Muirhead L.B., Evans, A.D. and Kirby, W, B. "Habitat use and diet of Skylarks Alauda arvensis wintering on lowland farmland in southern Britain," Journal of Applied Ecology, 38 (2001), 536–547, accessed October 2025].
- Donald, P.F. (2004) "The Skylark." T & AD Poyser, London.
- Fox, H., "Blithe Spirit: Are skylarks being overlooked in impact assessment?", InPractice 117 (Sept. 2022) [Clarkson & Woods Ltd.], [accessed October 2025].
- Game & Wildlife Conservation Trust (2024) Farmland Bird Information – Skylark. GWCT.
- GOV.UK, 2024. The Nature Recovery Network. Available at: https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network [Accessed October 2025].
- GOV.UK (2025) Wild Birds: Advice for Making Planning Decisions. Natural England Standing Advice. Available at: https://www.gov.uk/guidance/wild-birds-advice-for-making-planning-decisions. [accessed October 2025].

- Heywood, J. J. N., Massimino, D., Baker, L., Balmer, D. E., Brighton, C. H., Gillings, S., Kelly, L., Noble, D. G., Pearce-Higgins, J. W., White, D. M., Woodcock, P., Workman, E. and Wotton, S., The Breeding Bird Survey 2024: Population trends of the UK's breeding birds (BTO Research Report 787, Thetford: British Trust for Ornithology, Joint Nature Conservation Committee & Royal Society for the Protection of Birds, 2025), [redacted] [accessed October 2025].
- Mancini, F., Cooke, R., Woodcock, B.A, Greenop, A, Johnson, A.C. and Isaac, N.J.B., 2023 Invertebrate biodiversity continues to decline in cropland, R. Soc. B.29020230897
- Montag, H., Parker, G., & Clarkson, T. (2016). The Effects of Solar Farms on Local Biodiversity: A Comparative Study. Clarkson & Woods and Wychwood Biodiversity for the UK solar industry. [redacted] [accessed February 2026].
- Morris, A J et al (2004) Sustainable Arable Farming for an Improved Environment (SAFFIE): managing winter wheat sward structure for Skylarks Alauda arvensis. Ibis, 146 pp. 155-162
- Royal Society for the Protection of Birds (RSPB), "Using solar energy to power a brighter future", RSPB – Helping nature (London: RSPB): [redacted] [accessed October 2025].
- Royal Society for the Protection of Birds (RSPB), "Skylark conservation - Advice for farmers", (London: RSPB), accessed 21 October 2025: [redacted] [accessed May 2026]
- Secker, B. (2024). The diversity and behaviour of farmland birds on solar parks in the UK (MSc by Research thesis, Lancaster University, 2024). Available online at [redacted] [accessed January 2026].
- Smith, L. (ed.), The Birds of Shropshire (Liverpool: Liverpool University Press, 2019).
- Solar Energy UK (2023, 2024, 2025) Solar Habitat: Ecological Trends on UK Solar Farms. London: Solar Energy UK.
- Solar Energy UK (2022) Natural Capital Best Practice Guidance. London: Solar Energy UK.
- Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. "The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain". British Birds 114: 723-747. Available online at [redacted] [accessed October 2025].
- Taylor, M., & Marchant, J.H. (2011). The Norfolk Bird Atlas: summer and winter distributions 1999–2007. BTO Books, Thetford.
- Woodward, I., Aebischer, N., Burnell, D., Eaton, M., Frost, T., Hall, C., Stroud, D.A. & Noble, D. (2020). Population estimates of birds in Great Britain and the United Kingdom. British Birds 113: 69–104.

Solar Energy UK
6 Langley Street, London WC2H 9JA

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