



Botley West Solar Farm

STATEMENT OF COMMON GROUND –
NATURAL ENGLAND

EN010147/APP/11.7/8

04 June 2025

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Statement of Common
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Approval for issue

Jon Alsop

4 June 2025

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Appendix A Record of Relevant Correspondence

SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Natural England.

NATURAL ENGLAND

[Signature]

[Name]

[Title]

[Organisation]

[Date]

PDVP on behalf of SolarFive

[Signature]

[Name]

[Title]

[Organisation]

[Date]

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/7

1.2 Date of Examination

1.2.1 May 2025 – November 2025

1.3 Proposed Development

1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.

1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a DCO. The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.

1.3.3 This Statement of Common Ground (SoCG) has been prepared to support the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).

1.3.4 A Location Plan can be found in the Examination Library at **[AS-024]** and a full description of the Project can be found at ES Chapter 6 - Project Description **[APP-043]**.

1.4 Statement Overview

1.4.1 This Statement of Common Ground ('SoCG') is a working draft document. It comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.4.2 An overarching Statement of Commonality **[EN010147/APP/11.7/7]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.3 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Ecology and Nature Conservation
- Agricultural Land Use & Public Rights of Way
- Landscape and Visual Resources

- 1.4.4 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Natural England to date:
- Relevant submission documents and plans
 - Record of relevant correspondence to date
 - Matters that are agreed
 - Matters yet to be agreed
 - Matters that are not agreed

2 Relevant Submissions Documents and Plans

- 2.1.1 A list of DCO documents and plans of relevance to engagement with Natural England is identified in the tables below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to Natural England discussions - Ecology and Nature Conservation

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/2.2	Streets, Access and Rights of Way Plans	APP-005	November 2024
EN010147/APP/2.6	Statutory and Non-Statutory Sites - Features of Nature Conservation Plan	APP-009	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	APP-010	November 2024
EN010147/APP/2.9	Statutory and Non-Statutory Features of Historic Environment Plan	APP-012	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	APP-013	November 2024
EN010147/APP/3.1	Draft Development Consent Order	APP-015	November 2024
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	APP-037	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	APP-046	P0/ November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.1 Statutory Designated Sites	APP-086	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	APP-087	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	APP-088	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	APP-150	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	APP-151	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	APP-152	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	APP-153	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	APP-154	P0/ November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	APP-155	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	APP-156	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	APP-157	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	APP-158	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	APP-159	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	APP-160	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	APP-161	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	APP-162	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	APP-163	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	APP-164	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	APP-165	P0/ November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	APP-228	November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	APP-232	P0/ November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	APP-233	P0/ November 2024
EN010147/APP/7.6.2	Outline Operational Management Plan	APP-234	P0/ November 2024
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	APP-235	P0/ November 2024
EN010147/APP/7.6.4	Outline Decommissioning Plan	APP-236	P0/ November 2024

Table 2.2: Draft DCO submission documents and plans record pursuant to Natural England discussions – Agricultural Land Use and PRoW

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	ES Chapter 17 - Agricultural Land Use and Public Rights of Way	APP-054	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.4	ES - Figures 17.1 to 17.6	APP-108 to APP-113	Rev01/November 2024
EN010147/APP/6.5	ES - Appendix 17.1 ALC and Soil Survey Report	APP-223	Rev01/November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-232	Rev01/November 2024
EN010147/APP/7.6.2	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-233	Rev01/November 2024

Table 2.3: Draft DCO submission documents and plans record pursuant to Natural England discussions – Landscape and Visual Resources

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment	APP-045	Rev01/November 2024
EN010147/APP/6.4	Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer)	APP-065	Rev01/November 2024
EN010147/APP/6.4	Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter)	APP-066	Rev01/November 2024
EN010147/APP/6.4	Figure 8.1-8.3 Site Location	APP-067	Rev01/November 2024
EN010147/APP/6.4	Figure 8.245: Regional Landscape Character	APP-069	Rev01/November 2024
EN010147/APP/6.4	Figure 8.246: Local Landscape Character Areas	APP-070	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.4	Figure 8.247: District Landscape Character Areas (including ZTV)	APP-071	Rev01/November 2024
EN010147/APP/6.4	Figure 8.248 to 8.371: Photomontages (Winter and Summer)	APP-072 to APP-080	Rev01/November 2024
EN010147/APP/6.4	Figure 8.4-8.6: Landscape Resources Plan	APP-081	Rev01/November 2024
EN010147/APP/6.4	Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview)	APP-082	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8: ZTV Section Overlaps (Whole Project Overview)	APP-083	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8a: ZTV Bare Earth	APP-084	Rev01/November 2024
EN010147/APP/6.4	Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations	APP-085	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.1: Landscape Character	APP-143	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.2: Landscape Value	APP-144	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement	APP-145 to APP148	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.4: Photomontage Methodology	APP-149	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	Figure 2.1a to 2.4d: Illustrative Masterplan	APP-062	Rev01/November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	APP-228	Rev01/November 2024
EN010147/APP/7.6.3	Outline Landscape and Ecological Management Plan	APP-235	Rev01/November 2024

3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Natural England and both parties continue to engage following the submission of the DCO application for the project.
- 3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and Natural England to date.

4 Matters That Are Agreed

Table 4.1: Record of Matters of Specific Agreement to Date – Ecology and Nature Conservation

Date	Matter	Comment	Outcome
Methodology			
	Survey methodology	NE have agreed survey methodology for Phase 1, hedgerows, bats, great crested newts, terrestrial invertebrates, reptiles, badger, breeding birds, wintering birds, dormouse, veteran trees and arable weeds. NE have also agreed surveys are not required for otter, water vole, fish, aquatic invertebrates and aquatic, macrophytes, brown hare and hedgehog.	Agreed
	Ecology and nature conservation receptors	NE have agreed to the list of ecology and nature conservation receptors presented in ES Volume 1, Chapter 9, Table 9.6.4 [APP-046] .	Agreed
	Assessment approach and methodology	NE have agreed to the assessment approach and methodology presented in ES Volume 1, Chapter 9, Section 9.4 Assessment Methodology and Section 9.5 Assessment Criteria and Assignment of Significance [APP-046] .	Agreed
Internationally designated sites			
	Two internationally designated sites have been identified as subject to potentially likely significant effects from this proposal. Natural England agree the scope of the HRA Screening exercise was appropriate.	Noted	Agreed
	Impacts to Cothill Fen Special Area of Conservation (SAC) - Natural England agree with the conclusions within Environmental Statement (ES): Appendix 9.14 Habitats Regulations Assessment (HRA) Report (November 2024) [APP-163] on Cothill Fen SAC that there would be no likely significant effect on this site.	Noted	Agreed
	Impacts to Oxford Meadows SAC – subject to securing measures set out in the oCoCP [APP-232] [APP-233] , Natural England agree that it is likely there would	Noted	Agreed

Date	Matter	Comment	Outcome
	be no adverse effect on the integrity of Oxford Meadows SAC.		

Nationally designated sites

These sites are presented in Table 9.6.2 in Chapter 9 of the ES [APP-046]. Natural England note that this table has a column labelled 'relevant qualifying interest' when in fact this column shows the designation classification. Natural England's previous Section 42 Consultation Response highlighted the need for a full assessment of impacts to SSSIs, showing which sites had been considered, their interest features, potential impact pathways and any mitigation measures. For most of the SSSIs listed, the qualifying interest features are not fully identified or set out. The assessment is not presented in a way which examines each individual SSSI, but it does consider the relevant pathways of impact to the SSSIs. A summary table or additional column to Table 9.6.2 which showed the results of the assessment for particular sites would be helpful.	Updated Table 9.6.2 within Chapter 9 of the ES to be provided to include the relevant qualifying interest features.	Agreed
Natural England agree with the conclusions of the assessment of impacts to SSSIs.		

Ancient woodland and Ancient/veteran Trees

Natural England note that while there is no Ancient Woodland within the order limits, such features do occur immediately adjacent to it and in the surrounding landscape. There are also ancient/veteran trees within the order limits or within close proximity Both Ancient Woodland and ancient/veteran trees are protected by appropriate buffers and, as such, NE have no detailed comments .	Noted	Agreed
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Table 4.2: Record of Matters of Specific Agreement to Date - Agricultural Land Use and Public Rights of Way

Date	Matter	Comment	Outcome
Soils and best and most versatile land			
Up to DL1	1. Agricultural land use (RR-0761-017): Soils and Best and Most Versatile Agricultural Land - Natural England apologise that we are not able to provide our relevant representations on this topic due to	Natural England subsequently confirmed they have no formal concerns in relation to soils and best most versatile land. Natural England will confirm this matter has been agreed as	Agreed.

Date	Matter	Comment	Outcome
	an internal error. We will endeavour to update this position as soon as we are able.	part of their written representation to be submitted at Deadline 1.	
Public Rights of Way			
Up to DL1	2. Rights of Way, Access Land, National Trails (RR-0761-019): Rights of Way, Access Land, National Trails - There are no National Trails, Open Access Land or Coast paths within the order limits; as such, no impacts to these features are likely. We recognise the oLEMP's commitment to provide and maintain new permissive walking routes as well as the consideration of impacts to open space, leisure and play in Chapter 16 of the ES [APP-053]. We look forward to further working with the applicant to input into access provision, connecting people with nature, and designing access provision to minimise impacts to biodiversity.	The Applicant notes Natural England's agreement that there would be no impacts to National Trails, Open Access Land or Coast paths within the Order Limits.	Agreed.

Table 4.3: Record of Matters of Specific Agreement to Date – Landscape and Visual Resources

Date	Matter	Comment	Outcome
Nationally Designated Landscapes			
Up to DL1	The proposed development is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development. The examining authority should have regard for the landscape character of the area; Natural England welcome the reference to Natural England's National Character Areas and other Local Landscape Character Assessments within ES Chapter 8 (Landscape and Visual Impact Assessment). Natural England would also like to stress the importance of cumulative landscape impacts from the development.	An assessment of the cumulative landscape impacts from the development is provided in Section 8.11 of ES Chapter 8 Landscape and Visual Impact Assessment [APP-045].	Agreed

5 Matters Yet to be Agreed

Table 5.1: Record of Matters yet to be Agreed to Date – Ecology

Date	Matter	Comment	Outcome
Protected Species - Bats			
Up to DL1	<p>Natural England understand that the approach taken has been to sample some key landscape features in order to gain an understanding of the general level of bat activity and likely assemblage present. The number of sampling points (static detector locations) and the survey methods used (no in-field static detector locations/paired sampling, no onsite transects, and only limited information obtained from the radio tracked bats) have not allowed for a thorough understanding of how bats currently use the site, or a robust baseline. The bat surveys have not been comprehensive enough to identify key flight lines, key foraging areas, or identify hedgerow tree and woodland edge roosts to inform the design sufficiently to avoid the risk of affecting bats' use of these important areas. Although radio tracking was undertaken this was only used to locate roosts, with no regular over-night tracking of locations and activity to provide data on how those tagged bats are moving through and utilising the landscape.</p>	<p>Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include:</p> <ul style="list-style-type: none"> • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. <p>It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.</p>	Discussions on going
Up to DL1	<p>Of the data that has been obtained, although brief descriptions of static detector locations have been provided (Bat Survey Report [APP-153] Tables 2.1 and 2.2), Figures 2.1 and 2.2 are of such low resolution over a large scale that it is not possible to see the exact location of</p>	<p>Updated Figures 2.1 and 2.2 ES Appendix 9.4 Bat Survey Report [APP-153] at a higher resolution to be provided in the bat technical note.</p>	Discussions on going

Date	Matter	Comment	Outcome
	the sampling points and the habitat areas, linkages or corridors that were surveyed.		
Up to DL1	None of the data obtained from undertaking woodland transects and statics appear to have been reported, and the Preliminary Bat Roost Assessment (as referenced in para 9.4.27 of Chapter 9 of the Environmental Statement) has not been submitted to the document library.	Data to be provided in updated bat technical note.	Discussions on going
Up to DL1	The trapping and radio tracking data is only briefly described with no data available on which bats were trapped where and when, presence of juveniles, where each individual bat was radio tracked from and to, or the timing/synchronicity of roost emergence counts. All of this vital additional data would help to give context on how important the area is for bats and gain better understanding of the bats that utilise the site. For example, the unusually high numbers of 'big' bats trapped in woodland locations (30 noctule, 2 serotine and 3 Leisler's) may give important insight into their presence locally, or high numbers of Natterer's, if trapped in one location in autumn, could suggest swarming, but such generalised data does not allow for anything but generalised interpretation. No detailed information on methods for roost characterisation or emergence counts has been provided and it is not clear whether counts were made consecutively or simultaneously and no inference on aspects such as roost switching or fidelity can be made.	Full data with respect to the radio tracking to be provided in updated bat technical note. Such data have been presented to Natural England in a summarised form during on-going engagement post submission and are the subject of on-going discussions between the Applicant and Natural England.	Discussions on going
Up to DL1	Likewise, identification of maternity roosts from post-lactating females outside of the maternity period may also be misleading. Hundreds of bats were trapped and those fitted with radio transmitters were ringed, however no further mention of encountering or not encountering ringed bats is made. Given how extensively the bats in the wider area are studied (e.g. August <i>et al</i> 20142, and Wytham Bat Project3), it is interesting that no ringed bats were encountered during the trapping conducted, or this may be an omission in reporting.	Background data from the Wytham Bat Project has been obtained and will be described in the bat technical note. Bats ringed through that project were encountered within trapping in Wytham and in the Southern Site Area during the trapping completed in 2024. No other location across the Project caught bats ringed in Wytham	Discussions on going
Up to DL1	Natural England welcomes the conclusion that the mosaic of habitats within the Zone of Influence is considered to be of	The Project incorporates significant new, high-quality bat foraging habitat in the	Discussions on going

Date	Matter	Comment	Outcome
	<p>'at least national importance' to bats. However, species-poor fields, and open habitats should not automatically be considered of low habitat value to bats, especially as no in-field bat survey data has been obtained for any of the habitats present. It has not been reported whether the presence of field margins currently managed for nature conservation, areas of higher plant species diversity such as expanses of ruderals or hay-cut grassland, or existing damp/ephemerally wet areas have been surveyed for or related to bat foraging activity. Water (Entwistle et al., 20014) especially can increase insect numbers, hence benefit foraging bats. It is also worth considering the species assemblage known to be present within the site (barbastelle, Leisler's, Nathusius' pipistrelle, noctule, serotine, common pipistrelle, soprano pipistrelle, brown long-eared, and Myotis spp.), all of which are known to forage (at least occasionally) in open space, and all UK bat species are capable of commuting across open space when fully dark.</p>	<p>form of the River Evenlode Corridor, woodland, enhanced hedgerows and associated buffers. Areas where existing field margins occur will be incorporated into the buffers to be created along hedgerows.</p> <p>Further static monitoring data collected in 2024 will be submitted within the bat technical note. This includes data from in-field monitoring points to illustrate their use or otherwise by the existing bat population. These data will be used to help inform the overall area of buffers required for bats and associated foraging resource. The full data set will then be linked to existing and proposed habitat resource.</p>	
Up to DL1	<p>The bat survey data that has been obtained does not appear to have informed the design in any specific locations, except the retention and enhancement of the River Evenlode corridor. Yet, significant habitat creation and enhancement linking this potentially important riparian area with other areas of potential (and confirmed) importance such as woodlands, smaller copses and other riparian habitats, as well as known roosts, is not explicit in the design. It is also noted that static detector surveys indicated that another survey location (S7) supported a similar average level of bat activity as this riparian feature in 2023, which is not reflected in project design.</p>	<p>The masterplan is illustrative and there is an existing commitment to incorporate appropriate buffers to all important bat flightlines (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). This is likely to include corridors linking the Evenlode corridor to other areas of existing habitat.</p> <p>The bat technical note will draw together the habitat data with the survey data to demonstrate how bats will be accommodated within the masterplan.</p>	Discussions on going
Up to DL1	<p>Where hedgerows are to be 'reinforced' or larger buffers proposed (wider than the proposed 5m standard), this appears to be largely along public rights of way, access routes or some boundaries of the overall development area; these non-developed areas with larger buffers and greater habitat provision have not been specifically located along existing features or routes utilised by bats, or to</p>	<p>The location of the larger buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties.</p>	Discussions on going

Date	Matter	Comment	Outcome
	connect with or buffer known roosts and potential areas of supporting habitat.		
Up to DL1	<p>Paragraph 8.5.1 of the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235] states that '<i>The Project will incorporate appropriate buffers either side of any important bat flight line, as identified by radio tracking studies of the Project Site. Such buffers will not include any solar infrastructure and are to ensure that bats can use the landscape unhindered by any interaction between their echo location and solar panels</i>'. However, the radio tracking data and bat survey effort does not appear to have identified any important flight lines. If it is to be assumed that all existing landscape and habitat features including hedgerows, tree lines, watercourses and conservation field margins are used by the important bat assemblage present on the site, then provision of wider buffers along these features should be standard for the scheme. A 5m buffer is a minimum practical width to allow access for machinery to manage hedgerows and margins. Therefore, to be considered sufficient to mitigate potential impacts on bats, and provide benefits in terms of habitat retention and creation, it is recommended that these are enlarged to at least 10m either side of every hedgerow and along all non-ancient woodland edges, increased to 20m either side, or swathes and areas omitted from having PV panels altogether, where a significant habitat linkage is identified, or required to provide supporting habitat surrounding important roosts</p>	<p>The location and size of the appropriate buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties.</p>	Discussions on going
Up to DL1	<p>There is, however, insufficient bat survey data to identify all important commuting habitat used by bats. If the ES is referring to all hedgerows, then the 5m buffer is not considered adequate to be sure of preventing avoidance and severance impacts for bats. Should there be even a minor adverse significance of effect, as suggested by the ES, given the vast scale of the development, such altered behaviour could have a detrimental effect on the Annex II bat populations if bats no longer utilise the landscape in the same way for roosting, commuting or foraging. Providing wider buffers as standard along all hedgerows, as well as omitting key linkages and supporting habitat from installation of PV panels, and/or creating</p>	<p>Further survey work and data gathering was completed in 2024 is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This includes:</p> <ul style="list-style-type: none"> • additional static detector recording (including in-field); • full details of radio tracked bats (over-night tracking to generate home ranges, 	Discussions on going

Date	Matter	Comment	Outcome
	much wider habitat linkages would help to ensure that, should bats have an aversion to the areas of PV panels, there is sufficient space and habitat to allow the ecological functionality of the landscape to remain.	<p>biophysical details, roost characterisation, flight line usage etc.);</p> <ul style="list-style-type: none"> full details of trapping/radio tracking to be completed in May 2025 <p>During post submission discussions between the Applicant and Natural England, it was agreed that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.</p>	
Up to DL1	As per the Environmental Statement: Chapter 9 [APP-046] and Outline Landscape and Ecology Monitoring Plan (oLEMP) [APP-235] , monitoring is not proposed for bats post-development (unless specifically required under licensing for impacts to roosting bats; oLEMP para 16.5.15). Without conducting any monitoring and comparing this with a pre-development baseline it will not be possible to assess whether the development of the site has had an effect on bats, whether that is positive or negative, and highlight the need to address any negative impacts or changes to the management regime. The current level of survey data provides only a minimal baseline for the site, with data for a few localised areas. It would be beneficial to have a more thorough and robust baseline against which to measure change in bat activity or assemblage. A change in how bats utilise the site would not be possible to assess given the current minimal baseline. At the very least, Natural England recommend that there should be a commitment to monitor for changes in bat activity at these limited	A post-development monitoring regime has been discussed between the Applicant and Natural England during post-submission discussion. A final version will be set out in the bat technical note	Discussions on going

Date	Matter	Comment	Outcome
	locations during construction and post-development and incorporate any necessary changes into the LEMP for the site to ensure that the important bat assemblage is not adversely affected by the installation of the PV panels and the operation of the solar farm.		
Up to DL1	There are also points of clarity required over the existing value of the site's habitats for bats.	It was agreed during post-submission discussion between the Applicant and Natural England that the Applicant will provide further detail of the Project site's baseline value for bats within the bat technical note to help Natural England and other IPs to understand the baseline value and hence uplift in that value from the Project.	Discussions on going
Up to DL1	It is not clear how many of the proposed hedgerow buffers (proposed as embedded mitigation for impacts to bats), are encompassing existing habitat managed for nature conservation purposes. These margins will already be providing connectivity and foraging resources for bats, and retention although welcomed, is not providing a benefit that would serve to offset any losses of habitat or connectivity	It was agreed during post-submission discussion between the Applicant and Natural England that the Applicant will provide further detail of existing field margins within the bat technical note, noting that this can change from year to year as farmers change management.	Discussions on going
Up to DL1	There is a lack of clarity with respect to what constitutes a reinforced hedgerow.	Reinforced hedgerows include gappy and species-poor hedgerows to be supplemented by species infill planting. A mixture of native species will be used comprise additional planting [APP-235] .	Discussions on going
Up to DL1	There are a few errors in the Bat Survey Report.	The bat technical note will address and amend any errors in previous reporting and interpretation of the data.	Discussions on going
Protected Species Licensing			
Up to DL1	Protected species licences and Letters of No Impediment	The Applicant and Natural England are in discussion with respect to the provision of LONIs. It is anticipated that those for badger, dormice and GCN will be necessary. The issue of whether a licence is	Discussions on going

Date	Matter	Comment	Outcome
		necessary for bats is under discussion.	
Biodiversity Net Gain			
Up to DL1	Biodiversity Net Gain (BNG) – the river component of the BNG metric has not been completed.	The Applicant is currently completing the necessary surveys to allow the river component to be completed. Once completed, this will be provided to the Examination as part of an updated version of ES - Appendix 9.13 Biodiversity Net Gain Assessment [APP-162].	Discussions on going

Table 5.2: Record of Matters yet to be Agreed to Date – Agricultural Land Use and PRow

Date	Matter	Comment	Outcome
Soils and best and most versatile land			
Deadline 1 (04 June 2025)	All matters agreed.	All matters agreed.	All matters agreed.
Public Rights of Way			
Deadline 1 (04 June 2025)	All matters agreed.	All matters agreed.	All matters agreed.

Table 5.3: Record of Matters yet to be Agreed to Date – Landscape and Visual Resources

Date	Matter	Comment	Outcome
LVIA Methodology			
Deadline 1 (04 June 2025)	It is acceptable that the Landscape and Visual Impact Assessment [APP-045] has been carried in line with the guidance contained within the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute for Environmental Management and Assessment, 2013) (GLVIA3) and Landscape Institute Technical Guidance Note-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) (published August 2024) (LITGN-2024-01).	Discussions remain ongoing.	
Assignment of Significance			
Deadline 1 (04 June 2025)	When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be		Discussions remain ongoing.

Date	Matter	Comment	Outcome
	<p>deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment [APP-045] are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 “identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case.”</p> <p>Neither the EIA Regulations or GLVIA3, nor subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance.</p> <p>The LVIA uses the methodology set out at sections 8.4 and 8.6 of the submitted LVIA [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24).</p> <p>LI TGN-2024-01 provides clarification in the assessment of effects “...if using a scale of minor/moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.” (Issue / Question 3(5), Page 8).</p> <p>In assessing significance of effect, the LVIA has followed the methodology as set out in Sections 8.4 and 8.5 of the LVIA [APP-045].</p> <p>The numbers of people using the public rights of way network within the 5 m study area varies, as does the distance, context and visual characteristics of the view. It is not known how people use sections of a Public Right of Way, in which direction and when. Where no firm data are available a relative judgement is sufficient, as proposed in GLVIA3, Therefore, the position has been adopted of individuals using a public rights of way walking towards or through the Project, looking directly at the Project, even if wider views are available. Regarding valency, the position has been taken of that of a person who objects to the presence of the Project.</p>		

Date	Matter	Comment	Outcome
	It is the Applicant's position that the methodology used to assess the landscape and visual effects, of the Botley West Solar Farm Project, follows best practice guidance. The judgements made in the Landscape and Visual Impact Assessment (LVIA) are clear, transparent, correct and proportionate to the Project.		
Suitability of Representative Viewpoint Selection and Photomontages			
Deadline 1 (04 June 2025)	<p>The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project.</p> <p>Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP_149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045].</p> <p>At no point were aerial viewpoints suggested, either by the Applicant or the local planning authorities. GLVIA3 only mentions aerial imagery twice, in the context computer generated 3D models (paragraphs 8.28 and 8.29). Moreover, GLVIA3 explains that such models "do not necessarily represent the way that people would experience the change [in view] and so can be misleading in an assessment context" (GLVIA3, paragraph 8.29). This is especially true of people within vehicles including aircraft, travelling at speed on the approach to, or taking off from airports.</p> <p>The transient nature of potential views available from the air and the enclosed nature of the aircraft would reduce the sensitivity of the visual receptor to such a degree that there is no potential for significant effects. Land-based dynamic receptors are considered at paragraphs 8.6.44 to 8.6.65 of the LVIA [APP-045].</p>	Discussions remain ongoing.	
Mitigation			
Deadline 1 (04 June 2025)	<p>Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate,</p>	Discussions remain ongoing.	

Date	Matter	Comment	Outcome
	which over time would limit available views to the solar arrays.		
	The Project's main elements, the solar panels, would be low in height, at a maximum of 2.3m, and follow the natural contours of the landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.		
	Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that <i>"infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation"</i> (NPS EN-1, paragraph 3.3.63). The NPS explains further that with <i>"projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero"</i> (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed.		

6 Matters That Are Not Agreed

Table 6.1: Record of Matters that are Not Agreed – Ecology

Date	Matter	Comment	Outcome
Ecology			
A	B	C	D

Table 6.2: Record of Matters that are Not Agreed – Agricultural Land Use and PRow

Date	Matter	Comment	Outcome
Soils and best and most versatile land			
Deadline 1 (04 June 2025)	All matters agreed.	All matters agreed..	All matters agreed.
Public Rights of Way			
Deadline 1 (04 June 2025)	All matters agreed.	All matters agreed.	All matters agreed.

Table 6.3: Record of Matters that are Not Agreed – Landscape and Visual Resources

Date	Matter	Comment	Outcome
Landscape and Visual Resources			
A	B	C	D

Appendix A

Record of Relevant Correspondence

Date	Topic	Outcome	Status
Ecology			
16/10/23	Are nocturnal wintering bird surveys required	NE considering need for nocturnal wintering bird surveys. Confirmed not necessary to inform the assessment of impacts on any formally designated sites of nature conservation interest in post meeting e-mail.	Agreed
	Important ecological features (IEFs)- International Sites within 10 km, National Sites within 5 km and Local Sites within 2 km.	NE agreed, happy with zones of influence	Agreed
	Impacts scoped in and scoped out from assessment overview.	NE generally agreed but raised queries with respect to water quality and operational cleaning of the panels, and habitat severance/loss of connectivity. Applicant to provide clarifications.	Effects considered in ES
	Green infrastructure integration.	Applicant stated Oxfordshire Nature Recovery Strategy guided much of the green infrastructure planning.	-
05/02/24	Project update	Nil.	-
	Biodiversity Net Gain (BNG) Baseline.	NE agreed habitat baseline was appropriate and will confirm if pre-commencement surveys are required.	Agreed
	BNG and NSIPs – Cable routes.	Applicant to provide further details to NE on temporary impacts of cable routes.	-
	Rivers with BNG.	NE to provide feedback on exclusion of watercourse module.	-
	BNG metric.	Applicant to check how to fit into one metric.	-
	Bat survey work to date overview.	Applicant presented.	-
	Impact of ground mounted solar on bats.	NE were currently considering the implications. Mitigation was discussed that NE would likely support but would provide details of what NE's current position was.	-
	Infrared and security lighting.	Applicant confirmed no lighting would be present other than	

Date	Topic	Outcome	Status
		motion-triggered security lighting around key infrastructure.	
10/04/24	Consultation meeting	Project update and discussion around Masterplan.	-
11/09/24	Site visit and consultation meeting	Site visit showing NE key elements of Project. Further discussion around bat data and presentation of initial radio tracking findings.	-
19/03/25	Post-submission consultation meeting	Review of NE Relevant Representation.	-
12/05/25	2024 Bat Surveys and Methods.	Recent findings presented.	-
	Future bat surveys.	Discussed upcoming surveys.	-
	Trackability of bats during radio tracking surveys.	Applicant confirmed trackability of bats across survey areas.	Agreed.
	Correlation of types of bat survey data.	Applicant agreed bat tracking data will be analysed in conjunction with static data.	Agreed.
	Bat impacts and mitigation.	Discussion on impacts on bats, especially Bechstein's bat, use of Barbastelle Bat as a proxy species to guide mitigation, identification of important flight lines. NE uncomfortable that with the use of a single species to represent all bats.	Ongoing.
	Important bat flightline buffers.	NE position on appropriate mitigation for important flightlines uncertain until have digested complete analysis of current and future survey findings.	Ongoing.
	Warm dry spring effects on bats.	Discussion on if effects of warm dry start to Spring has been seen on other surveys by applicant, non-reported.	-
	Illustrative Masterplan and Change Requests.	Discussion of plans to submit change requests to update illustrative masterplan following collection of 2025 bat data and analyses to demonstrate accommodating bat mitigation.	Ongoing.
	Bat habitat data.	Analysis of bat movements to be tied in with habitat data.	Ongoing.
	Bat technical report.	NE to review bat technical report once all survey data compiled and evaluated.	Ongoing.
	Statement Of Common Ground (SOCG).	Intention for the SOCG for Deadline 1 is to focus on what NE and applicant agree on, and leave areas of contention, or areas lacking information for future Deadlines. And to agree issues	Ongoing.

Date	Topic	Outcome	Status
		prior to Deadlines, rather than work Deadline to Deadline.	
	Site visits.	Applicant invited NE to site, NE to check availability.	Ongoing.
Landscape and Visual Impact			
Outline Landscape and Ecology Management Plan (oLEMP).	Discussion on securing of masterplan, likely under oLEMP, which will be updated with bat migration. NE agreed with approach.	Ongoing.	Outline Landscape and Ecology Management Plan (oLEMP).
NE 'lake effect' position.	NE do not have a more recent position past their relevant published literature on the matter.	Ongoing.	NE 'lake effect' position.
Agricultural Land Use and Public Rights of Way			
October 2023	First meeting with Natural England which was used as an opportunity to discuss the assessment approach, soil survey work undertaken and mitigation measures to be incorporated into the Outline Code of Construction Practice, including Soil Management Plan and PRow Management Strategy for the Project.	The feedback received during this meeting with Natural England was used to inform relevant sections of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054] and measures included in the Outline Soil Management Plan and Outline PRow Management Strategy, which form Annex B and C of the - Outline Code of Construction Practice - Part 1 [APP-232].	Progressed.
August 2024	Second meeting with Natural England which was used as an opportunity to discuss the assessment approach, soil survey work undertaken and mitigation measures to be incorporated into the Outline Code of Construction Practice, including Soil Management Plan and PRow Management Strategy for the Project.	The feedback received during this meeting with Natural England was used to inform relevant sections of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054] and measures included in the Outline Soil Management Plan which forms Annex C of the - Outline Code of Construction Practice - Part 1 [APP-232].	Progressed