



# Botley West Solar Farm

STATEMENT OF COMMON GROUND –

Berks Bucks Oxon Wildlife Trust

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**EN010147/APP/11.7/14**

22 July 2025

NPI-12426  
Statement of  
Common Ground -  
Berks Bucks Oxon  
Wildlife Trust  
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## Approval for issue

Jon Alsop

22 July 2025

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### Prepared by:

**RPS**  
**101 Park Drive,**  
**Milton Park, Abingdon,**  
**Oxfordshire, OX14 4RY**  
**United Kingdom**

### Prepared for:

**Photovolt Development Partners GmbH,**  
**on behalf of SolarFive Ltd.**

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## SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Berks Bucks Oxon Wildlife Trust.

### Berks Bucks Oxon Wildlife Trust

[Signature]

[Name]

[Title]

[Organisation]

[Date]

### SolarFive Ltd

[Signature]

[Name]

[Title]

[Organisation]

[Date]

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# 1 Introduction

## 1.1 DCO Reference

1.1.1 EN010147/APP/11.7/14

## 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 Development Consent Order (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 This SoCG has been prepared between (1) the Applicant and (2) Berks Bucks Oxon Wildlife Trust (jointly referred to as the Parties).

1.4.3 An overarching Statement of Commonality **[EN01047/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.4 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 Letter **[PD-006]**:

- Methodology for environmental assessments;

- Data collection methods;
- Baseline data;
- Data/statistical analysis, approach to modelling and presentation of results;
- Expert judgements, assumptions and worst case scenario;
- Assessment of alternatives;
- Design development;
- Identification and sensitivity of relevant features and receptors;
- Construction and operational effects;
- Embedded and additional mitigation;
- Cumulative effects and mitigation; and
- Relevant wording in the draft Development Consent Order (dDCO)

1.4.5 It can be taken that any matters not specifically referred to in sections 3 and 4 of this SoCG are not of material interest or relevance to Berks Bucks Oxon Wildlife Trust's representations and therefore have not been considered in this document.

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

- Ecology

1.4.7 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Berks Bucks Oxon Wildlife Trust 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

1.4.8 As referenced above, c, d, and e (sections 4), summarises issues that are 'agreed', 'yet to be agreed' or are 'not agreed'. 'Not agreed' indicates a final position where the parties have agreed to disagree. 'Agreed' indicates that an issue has been resolved.

## 2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with Berks Bucks Oxon Wildlife Trust is identified in the tables below for ease of reference.

**Table 2.1: Draft DCO submission documents and plans record pursuant to Berks Bucks Oxon Wildlife Trust 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	<a href="#">APP-005</a>	November 2024
EN010147/APP/2.6	Statutory and Non-Statutory Sites - Features of Nature Conservation Plan	<a href="#">APP-009</a>	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	<a href="#">APP-010</a>	November 2024
EN010147/APP/2.9	Statutory and Non-Statutory Features of Historic Environment Plan	<a href="#">APP-012</a>	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	<a href="#">APP-013</a>	November 2024
EN010147/APP/3.1	Draft Development Consent Order	<del>REP2-004</del> <a href="#">APP-015</a>	<del>Rev3/ July 2025</del> November 2024
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	<del>APP-037</del> <a href="#">APP-037</a>	<del>P0/ November 2024</del> November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	<del>REP2-012</del> <a href="#">PDB-008</a>	<del>Rev2/ July 2025</del> November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.1 Statutory Designated Sites	<a href="#">APP-086</a>	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	<a href="#">APP-087</a>	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	<a href="#">APP-088</a>	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	<a href="#">APP-150</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	<a href="#">APP-151</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	<a href="#">APP-152</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	<a href="#">APP-153</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	<a href="#">APP-154</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	<a href="#">APP-155</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	<a href="#">APP-156</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	<a href="#">APP-157</a>	P0/ November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	<a href="#">APP-158</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	<a href="#">APP-159</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	<a href="#">APP-160</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	<a href="#">APP-161</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	<a href="#">APP-162</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	<a href="#">APP-163</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	<a href="#">APP-164</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	<a href="#">APP-165</a>	P0/ November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	<del>REP2-016</del> <a href="#">APP-228</a>	<del>Rev2/ July 2025</del> <a href="#">November 2024</a>
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	<del>APP-232</del> <a href="#">APP-232</a>	<del>P0/ November 2024</del> <a href="#">P0/ November 2024</a>
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	<del>APP-233</del> <a href="#">APP-233</a>	<del>P0/ November 2024</del> <a href="#">P0/ November 2024</a>
EN010147/APP/7.6.2	Outline Operational Management Plan	<del>REP2-017</del> <a href="#">APP-234</a>	<del>Rev2/ July 2025</del> <a href="#">P0/ November 2024</a>
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	<del>REP2-019</del> <a href="#">APP-235</a>	<del>Rev2/ July 2025</del> <a href="#">P0/ November 2024</a>
EN010147/APP/7.6.4	Outline Decommissioning Plan	<a href="#">APP-236</a>	P0/ November 2024

### 3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Berks Bucks Oxon Wildlife Trust, and both parties continue to engage throughout and beyond 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 Berks Bucks Oxon Wildlife Trust to date.



4 Areas of Discussion between the Parties

Table 4.1: Areas of Discussion between the Parties – Ecology and Nature Conservation

Ref	Relevant Application Document	Summary of Description of Matter	Berks Bucks Oxon Wildlife Trust Current Position	Applicant Current Position	Status
APP-015	3.1 - Draft Development Consent Order	Draft DCO	BBOWT have no comments on the Articles and Requirements of Draft DCO.	Agreed.	Agreed.
-	-	Introduction	<p>Whilst we understand the need for greater renewable energy, we have significant concerns over the scale of the plans and do not believe the information available demonstrates that the project can proceed without substantial risks to nature. It is important that the impacts of new solar farms on the local environment are properly assessed and areas of existing high wildlife value habitat are avoided. We are concerned that given the scale of the proposed Botley West Solar Farm, the lack of comparable solar farms in terms of size and the limited research into the effects of solar farms of this scale on the local environment, the true nature of the potential impact of the proposals on the local environment cannot be adequately ascertained.</p> <p>We consider there is a lack of evidence available on the large number of risks posed to the local natural environment. We also consider that the plans lack sufficient ambition to improve the area for wildlife and we are particularly disappointed in the lack of ambition to create high quality wildlife habitats amongst the panels themselves.</p>	<p>The representation from BBOWT to the Project application is comprehensive and welcome.</p> <p>Broad positions on each theme are set out below. Consultation to resolve BBOWT's concerns are on-going.</p>	Discussions ongoing.
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Large scale wildlife impacts	Impact on a very large area of wildlife-rich rural land and impact on connectivity with subsequent isolation of habitats and species: See RR-0098	The Applicant's position is that the area of the Project within which the solar panels will sit will not be dominated by metal, glass, security fencing and tarmac. As shown on the Landscape, Ecology and Amenities Plan <a href="#">[REP2-016AS-022]</a> , although there will be the solar panels and their support structures, the majority of the site will be vegetated, primarily grass, grazed at a conservation stocking rate by sheep to maintain a diverse sward height and structure. Although the panels will change how the site looks, the intention, as set out in Section 7 (Ecology Strategy) of the Outline Landscape and Ecology Management Plan (oLEMP) <a href="#">[REP2-019APP-234]</a> , is for the Project to deliver an overall enhancement for ecology compared to the intensive arable baseline that dominates the majority of the Project site.	Discussions ongoing.
REP2-019	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1)	Clarity and ambition in Evenlode corridor	The need for greater clarity and ambition regarding the essential mitigation provided by the Evenlode wildlife mitigation area: see RR-0098	<p>The Applicant welcomes BBOWT's support with respect to the aim of the Evenlode Corridor and their helpful recommendations which are the subject of on-going discussions with them to ensure that the goal of creating a wildlife corridor of at least Local Wildlife Site status is realised.</p> <p>It is intended for full details of the Evenlode Corridor, its creation and management will be set out in the appropriate LEMP for that area, following the principles set out in the oLEMP <a href="#">[REP2-</a></p>	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Berks Bucks Oxon Wildlife Trust Current Position	Applicant Current Position	Status
				<p><a href="#">019APP-234</a>]. However, the details of what the Corridor will comprise have not yet been determined at this stage in the applications. As such, the opportunity to engage with BBOWT and draw on their expertise is welcome. The Applicant will then provide an update to the oLEMP following such engagement to ensure that further clarity is provided regarding what the aims of the Evenlode Corridor will be and how that essential mitigation will be created and managed.</p> <p>The apparent discrepancy between the BNG assessment and the description of the habitats of the Corridor within the oLEMP is a result of the classification of the habitats within the BNG metric. The lower value floodplain wetland mosaic has been used on a precautionary basis – it is a mosaic of habitats and, at this outline design phase, represents a more heterogenic habitat type than using a single habitat such as Floodplain Meadow, given that some of the area will be other habitat types. A final detailed landscape scheme for the area would be produced as part of the detailed LEMP for this area.</p>	
REP2-019	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1)	Proposed habitat diversity	Greater habitat diversity of the grassland within the solar panels, and of the habitats in the margins and hedgerows, is needed to compensate for the negative impact on wildlife: see RR-0098.	<p>As set out in the oLEMP [<a href="#">REP2-019APP-234</a>], the intention is to manage the grasslands within the panel areas of the Project site through grazing at a conservation stocking rate, i.e. that grazing is used as a tool to manage the grasslands for conservation outcomes rather than commercial livestock production.</p> <p>The exact seed mix to be used to create the grasslands has yet to be finalised and would depend on soil type, although it would be based on a traditional meadow grazing mix that did include a diverse range of wildflowers associated with meadows, not those used to improve livestock diet. As set out in ES Appendix 9.13 BNG Report [APP-162], the target habitat within the panel areas will be a modified grassland in good condition. Being in good condition requires supporting at least 6 species per square metre (i.e. botanically diverse for a solar site). This was considered to be a conservative approach to the assessment and allowed for the limitations of grassland creation under panels to be acknowledged within the BNG assessment (these are considered to be in poor condition). Variations in grazing pattern would allow a diverse structure to be achieved and a summer shut up across most of the Project site to allow plants to flower and set seed will also help to maintain diversity. The comments with respect to potential hay cuts etc. are welcome and will be explored by the Applicant further.</p> <p>The comments with respect to the management of both field margins and hedgerows are also welcome.</p>	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Berks Bucks Oxon Wildlife Trust Current Position	Applicant Current Position	Status
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Farmoor reservoir impacts	Impact on Farmoor Reservoir, Cassington Gravel Pits, watercourses, and wetland birds and aquatic insects: see RR-0098.	<p>The Applicant welcomes further discussion with BBOWT with respect to maximising the potential ecological outcomes from the management of these areas and the Project site in general. Following such engagement, the Applicant will then provide an update to the oLEMP to ensure that any changes to the management are captured and represented within that document.</p> <p>Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [PDB-008].</p> <p>The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [PDB-008]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. This evidence was relied upon by the applicant of the 360ha Cleve Hill Solar Farm NSIP in north Kent, a site that sits directly adjacent to the Swale Special Protection Area (SPA), i.e. in a far more sensitive location with respect to birds than the Botley West Solar Farm. It was also accepted by Natural England, PINS and the Secretary of State at the time that scheme was consented.</p> <p>Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping et al. 2025).</p> <p>The Applicant will continue to engage with BBOWT on this issue.</p>	Discussions ongoing.
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Farmland birds	Impacts on farmland birds: see RR-0098	<p>The impact on both breeding and wintering birds is assessed in Section 9 of ES Chapter 9 Ecology and Biodiversity [PDB-008]. This sets out that the impacts to breeding birds of the Project would be not significant, but the overall loss of wintering habitat (the arable land) was considered likely to be significant. However, recent research on the impact of solar farms on farmland birds (Copping et al 2025) found that solar sites managed primarily for conservation had significantly higher bird numbers and species diversity. The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. The</p>	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Berks Bucks Oxon Wildlife Trust Current Position	Applicant Current Position	Status
				<p>Copping et al research found solar sites with such mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [APP-235], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present. In addition, the Project will deliver 30+ha of grassland within the archaeology areas that will provide permanent bird habitat – to be managed specifically for both breeding and wintering periods.</p> <p>The Applicant will continue to engage with BBOWT on this issue.</p>	
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Ancient woodland and bat populations	Impact on ancient woodland and on bat populations: see RR-0098,	<p>Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England and other IPs. Data will be provided to the Examination as a separate bat technical note as soon as analysis is complete. This will include:</p> <ul style="list-style-type: none"> <li>• additional static detector recording (including in-field data);</li> <li>• full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and</li> <li>• full details of trapping/radio tracking to be completed in May 2025.</li> </ul> <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/other IPs with respect to the use of these data for this commitment are on-going.</p>	Discussions ongoing.
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Conservation Target Areas	Unassessed/unclear impacts on Conservation Target Areas (CTAs) and the absence of enhancement measures specifically targeted at the CTAs: see RR-0098.	<p>As set out in paragraph 9.4.8 of ES Chapter 9 Ecology and Biodiversity [PDB-008], CTAs are considered as part of the Locally-Designated Sites Important Ecology Feature (IEF). As such, impacts to them have been covered by the assessment of effects for that IEF throughout section 9 of ES Chapter 9.</p> <p>As set out by Wild Oxfordshire (<a href="https://www.wildoxfordshire.org.uk/oxfordshires-nature/oxfordshires-nature-recovery-network">https://www.wildoxfordshire.org.uk/oxfordshires-nature/oxfordshires-nature-recovery-network</a>) , CTAs form the basis of the Oxfordshire Nature Recovery Network (ONRN) which will, in turn, form</p>	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Berks Bucks Oxon Wildlife Trust Current Position	Applicant Current Position	Status
				<p>the basis for the Local Nature Recovery Strategy, once published. As set out in the Ecology Strategy for the Project (section 7 of the oLEMP [APP-235]), the ONRN formed the basis of the strategy and was considered at a very early point in the Project's design to ensure that the goals of landscape-scale connectivity etc. through Oxfordshire were incorporated into the Project. The key element of the ONRN that the Project incorporated at a landscape level was the Evenlode Corridor, but connectivity between the Rivers Dorn and Cherwell and associated corridors was also considered, especially for the Northern Site Area.</p> <p>The Applicant will continue to engage with BBOWT on this issue.</p>	
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Security fencing	Impact of security fencing on the movement of wildlife: see <b>RR-0098</b>	<p>The impact of fencing on habitat connectivity is assessed in section 9 of ES Chapter 9 Ecology and Biodiversity [PDB-008]. Fencing around the Project site will be permeable to small mammals to allow continued movement and connectivity.</p> <p>Further information on the fencing to be used around the Project site will be provided to reassure IPs in this regard.</p>	Discussions ongoing.
REP2-012	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2)	Lighting	Impact of lighting: see RR-0098.	<p>The impact of lighting and associated disturbance of wildlife is assessed in section 9 of ES Chapter 9 Ecology and Biodiversity [PDB-008]. As per commitment 9.16, the Code of Construction Practice (CoCP) will ensure that lighting during construction is controlled and designed according to best practice standards.</p> <p>Lighting during operation will be as set out in Table 6.4 of ES Chapter 6 Project Description [APP-043]. Further information on the lighting to be used around the Project site during operation will be provided to reassure IPs in this regard</p>	Discussions ongoing.
REP2-019	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1)	The need for an intensive high-quality monitoring programme	<p>We welcome the principle of the monitoring programme set out in the landscape and ecology management plan, although we consider much more could be done than is proposed. We have indicated some aspects where we consider monitoring is needed within this response and where those are not already included in the proposed monitoring plan then we would ask that they are.</p> <p>Also, we consider that the monitoring results needs to be made public so that the experience gained here can be used to inform other solar farms. There is a lack of research on outcomes for wildlife from solar farms. For the avoidance of doubt we consider it is important that if the inspectorate is minded to approve the application that the landscape and ecology management plan (which we consider though still needs further work) along with other key documents would need to be included in conditions.</p>	<p>The details of the proposed monitoring plan are set out in section 12 of the oLEMP [APP-235]. It is intended that monitoring reports will be made public. The oLEMP will be updated in a further iteration to make sure this is explicitly stated.</p> <p>The Applicant will continue to engage with BBOWT on this issue.</p>	Discussions ongoing.



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## Appendix A

### Record of Relevant Correspondence

Date	Form of Correspondence	Topics Discussed	Outcomes
Ecology			
Nil.			