



# Botley West Solar Farm

STATEMENT OF COMMON GROUND –  
Natural England

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**EN010147/APP/11.7/8**

22 July 2025

NPI-12426  
Statement of  
Common Ground -  
Natural England  
v2  
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## Approval for issue

Jon Alsop

22 July 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]

### SolarFive Ltd

[Signature]

[Name]

[Title]

[Organisation]

[Date]

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# 1 Introduction

## 1.1 DCO Reference

1.1.1 EN010147/APP/11.7/8

## 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) Natural England (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 Natural England'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 and Nature Conservation
- Agricultural Land Use & Public Rights of Way
- Landscape and Visual Resources

1.4.7 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

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 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	<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	<a href="#">REP2-004APP-015</a>	<a href="#">Rev3/ July 2025</a> <del>November 2024</del>
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	<a href="#">APP-037</a>	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	<a href="#">REP2-012APP-046</a>	<a href="#">Rev2/ July 2025</a> <del>P0/ November 2024</del>
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	<a href="#">REP2-016APP-228</a>	<a href="#">Rev2/ July 2025</a> <del>P0/ November 2024</del>
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	<a href="#">APP-232</a>	P0/ November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	<a href="#">APP-233</a>	P0/ November 2024
EN010147/APP/7.6.2	Outline Operational Management Plan	<a href="#">REP2-017APP-234</a>	<a href="#">Rev2/ July 2025</a> <del>P0/ November 2024</del>
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	<a href="#">REP2-019APP-235</a>	<a href="#">Rev2/ July 2025</a> <del>P0/ November 2024</del>
EN010147/APP/7.6.4	Outline Decommissioning Plan	<a href="#">APP-236</a>	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
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

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
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
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	<a href="#">REP2-016APP-228</a>	<a href="#">Rev2/ July 2025</a> <a href="#">Rev01/November 2024</a>
EN010147/APP/7.6.3	Outline Landscape and Ecological Management Plan	<a href="#">REP2-019APP-235</a>	<a href="#">Rev2/ July 2025</a> <a href="#">Rev01/November 2024</a>

### 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 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 Natural England 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	Natural England Current Position	Applicant Current Position	Status
4.1.1	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	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.	Agreed.
4.1.2	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	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-046REP2-012].	Agreed.	Agreed.
4.1.3	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	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-046REP2-012].	Agreed.	Agreed.
4.1.4	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	HRA scope	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.	Agreed.	Agreed.
4.1.5	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Impacts to Cothill Fen Special Area of Conservation (SAC)	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.	Agreed.	Agreed.
4.1.6	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Impacts to Oxford Meadows SAC	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 be no adverse effect on the integrity of Oxford Meadows SAC.	Agreed.	Agreed.
4.1.7	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	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	Updated Table 9.6.2 within Chapter 9 of the ES to be provided to include the relevant qualifying interest features.  <b>Deadline 3 Update: Updated ES Chapter 9 submitted at Deadline 2 [REP2-012] incorporating changes requested.</b>	Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			the results of the assessment for particular sites would be helpful. Natural England agree with the conclusions of the assessment of impacts to SSSIs.		
4.1.8	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	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 .	Agreed.	Agreed.
4.1.9	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Bat surveys	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.	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: <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> 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.	Discussions on going
4.1.10	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Bat survey figures	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 the sampling points and the habitat areas, linkages or corridors that were surveyed.	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.	Discussions on going.
4.1.11	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Preliminary Bat Roost Assessment	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.
4.1.12	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Bat trapping and radio tracking data	The trapping and radio tracking data is only briefly described with no data available on which bats were	Full data with respect to the radio tracking to be provided in updated bat technical note. Such data	Discussions on going.

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			trapped where and when, presence of juveniles, where each individual bat was radio tracked from and 6 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.	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.	
4.1.13	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Ringed bats.	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 et al 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.
4.1.14	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Bat habitats	Natural England welcomes the conclusion that the mosaic of habitats within the Zone of Influence is considered to be of '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.	The Project incorporates significant new, high-quality bat foraging habitat in the 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. 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.	Discussions on going.
4.1.15	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Bat surveys informing design.	The bat survey data that has been obtained does not appear to have informed the design in any specific locations, except the retention and	The masterplan is illustrative and there is an existing commitment to incorporate appropriate buffers to all important bat flightlines (ES Appendix	Discussions on going.



Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			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.	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.  The bat technical note will draw together the habitat data with the survey data to demonstrate how bats will be accommodated within the masterplan.	
4.1.16	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Hedgerow enhancements	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 connect with or buffer known roosts and potential areas of supporting habitat.	The location of the larger buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties.	Discussions on going.
4.1.17	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Important bat flight line buffers	Paragraph 8.5.1 of the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235REP2-019] states that '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'. 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.	The location and size of the appropriate buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties.	Discussions on going.
4.1.18	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Important bat flight line buffers and survey	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	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:	Discussions on going.

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			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 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.	<ul style="list-style-type: none"> <li>additional static detector recording (including in-field);</li> <li>full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.);</li> <li>full details of trapping/radio tracking to be completed in May 2025</li> </ul> <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>	
4.1.19	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Bat monitoring	As per the Environmental Statement: Chapter 9 [APP-046] and Outline Landscape and Ecology Monitoring Plan (oLEMP) [APP-235REP2-019], 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 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.	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.
4.1.20	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Lack of clarity of site's value for bats	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.

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
4.1.21	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Lack of clarity of hedgerow buffers	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.
4.1.22	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Lack of clarity of what constitutes a reinforced hedgerow.	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.
4.1.23	6.5 ES - Appendix 9.4 Bat Survey Report [APP-153]	Bat survey report errors	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.
4.1.24	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Protected species licences and Letters of No Impediment	Protected species licences and Letters of No Impediment will be required.	It is anticipated that those for badger, dormice and GCN will be necessary. The issue of whether a licence is necessary for bats is under discussion.	Discussions on going.
4.1.25	6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]	Biodiversity Net Gain watercourses	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].	Biodiversity Net Gain (BNG) – the river component of the BNG metric has not been completed.

**Table 4.2: Areas of Discussion between the Parties – Agricultural Land Use and Public Rights of Way**

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
4.2.1	ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054].	Natural England were not being able to provide relevant representations on Soils and Best and Most Versatile Agricultural Land due to an internal error.	<b>1. Agricultural land use (RR-0761-017):</b> 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 an internal error. We will endeavour to update this position as soon as we are able.	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 part of their written representation to be submitted at Deadline 1.	Agreed.

**Table 4.3: Areas of Discussion between the Parties – Landscape and Visual Resources**

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
4.3.1	Chapter 8: Landscape and Visual Impact Assessment. [APP-045]	Nationally Designated Landscapes	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	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



Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			also like to stress the importance of cumulative landscape impacts from the development.		

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## Appendix A

### Record of Relevant Correspondence

Date	Form of Correspondence	Topics Discussed	Outcomes
<b>Ecology</b>			
16/10/23	Meeting	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.
		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
		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.
		Green infrastructure integration.	Applicant stated Oxfordshire Nature Recovery Strategy guided much of the green infrastructure planning.
05/02/24	Meeting	Project update	Nil.
		Biodiversity Net Gain (BNG) Baseline.	NE agreed habitat baseline was appropriate and will confirm if pre-commencement surveys are required.
		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

Date	Form of Correspondence	Topics Discussed	Outcomes
			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 motion-triggered security lighting around key infrastructure.
10/04/24	Meeting	Consultation meeting	Project update and discussion around Masterplan.
11/09/24	Meeting	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	Meeting	Post-submission consultation meeting	Review of NE Relevant Representation.
12/05/25	Meeting	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.
		Correlation of types of bat survey data.	Applicant agreed bat tracking data will be analysed in conjunction with static data.
		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.
		Important bat flightline buffers.	NE position on appropriate mitigation for important flightlines uncertain until have digested complete analysis of current and future survey findings.
		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.
		Bat habitat data.	Analysis of bat movements to be tied in with habitat data.

Date	Form of Correspondence	Topics Discussed	Outcomes
		Bat technical report.	NE to review bat technical report once all survey data compiled and evaluated.
		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 prior to Deadlines, rather than work Deadline to Deadline.
		Site visits.	Applicant invited NE to site, NE to check availability.
<u>08/07/25</u>	<u>Meeting</u>	<u>Minutes still to be agreed but areas covered include:</u> <ul style="list-style-type: none"> <li><u>• Overview of all bat survey work including that from May 2025 and activity data analysed to date.</u></li> <li><u>• Overview of Change Request 2 submitted at D2.</u></li> <li><u>• Proposed 25m buffer locations on key bat flightlines plus discussion on location and extent of other buffers.</u></li> <li><u>• Provision of bat technical note including contents.</u></li> <li><u>• Scope of potential air quality assessment in respect of Oxford Meadows SAC.</u></li> </ul>	
<b>Agricultural Land Use and Public Rights of Way</b>			
October 2023	Online meeting via Microsoft Teams	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.	Progressed.

Date	Form of Correspondence	Topics Discussed	Outcomes
August 2024	Online meeting via Microsoft Teams	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.	Progressed.
<b>Landscape and Visual Resources</b>			
<u>Outline Landscape and Ecology Management Plan (oLEMP).</u>	<u>Email on the back of others.</u>	<u>Discussion on securing of masterplan, likely under oLEMP, which will be updated with bat migration. NE agreed with approach.</u>	<u>Ongoing. Current position is that masterplan will be secured through oLEMP as part of requirement 6 of the draft DCO.</u>
xx			
<u>NE 'lake effect' position.</u>	<u>Email on the back of others.</u>	<u>NE do not have a more recent position past their relevant published literature on the matter.</u>	<u>Ongoing. NE 'lake effect' position.</u>