Planning Inspectorate

15th August 2025

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Re: Botley West Solar Farm - Examining Authority Second Written Questions (ExQ2)

Forestry Commission Interested Party/Unique Reference Number: BWSF-ISP001

Dear Examining Authority,

Please find our responses to ExQ2 below.

Our response to Question 2.8.7

We have made reference to relevant national policy statement throughout our consultation response to frame our advice. These are summarised below with a brief statement to clarify our position which is elaborated on in the summary and detailed comments in our previous consultation response (REP2-054).

> ***National Policy Statement for Energy: Paragraph 5.4.32***
> *'Applications should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operation phases.'*

Not all direct and indirect effects have been considered in line with the Standing Advice.

The Applicant's Environmental Statement suggests that adopting a 15m buffer will avoid impacts to Ancient Woodland. As outlined in our 'Woodland buffering' section of our consultation response, a 15m buffer is a **minimum** starting point designed for tree root impacts. There are other impacts that need to be considered before direct and indirect effects of irreplaceable habitat, and deterioration of condition can be considered avoided. Measures need to be effective for the specific site and proportionate to the project's landscape scale and the cumulative effects on multiple blocks of ancient woodland, connectivity and functionally linked habitat.

As advised in Item 1 of our response REP2-054, the project needs to explicitly consider **all** direct and indirect effects on ancient woodland have been assessed and mitigated for as set out by the Standing Advice under the '**Direct and indirect effects of development'** section. Following the advice we have given in REP2-054 would help to

avoid many of these effects. Adopting better buffering and habitat connectivity would help to avoid much of the potential effects by making them more site-specific, bigger, better quality for local biodiversity, better connected and support woodland species.

The full list of impacts identified in the Standing Advice and Assessment Guide should be considered. As part of this, our biggest concerns for this project relate to impacts from the following:

- Encroachment and loss of woodland edge habitat and its impacts on woodland species (including bats) that use the edge and fields for commuting and foraging, and the knock-on effects this can have for woodland condition
- Fragmentation and isolation of woodland areas through severing of connectivity and functionally liked habitat. Preventing movement of species and genetic material between woodlands, which could lead to habitat decline and loss of some species through population isolation.
- Loss or damage to trees on woodland edges due to proximity to solar panels/development and the need to manage or remove them in future. For example, to prevent tree falling on to development due to buffers that are not sufficient for current or future tree heights. This could amount to direct deterioration or loss of ancient woodland habitat. This is one of the effects listed by the Standing Advice 'changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss'

Species such as bats, birds and invertebrates rely on woodland edge as foraging and commuting habitat. A bigger, better quality and better-connected buffer should be designed and maintained to protect the highly valuable woodland edge and maintain suitable habitat. If the habitat becomes unsuitable for woodland associated species (e.g. invertebrate woodland pollinators), this could have a knock-on effect on the woodland health and could lead to further degradation. Our comments regarding protected species are restricted to their integral part of ancient woodland condition and integrity as an ecosystem. Please refer to Natural England advice as statutory consultees for Protected Species: Protected species and development: advice for local planning authorities - GOV.UK

The recommendations in our consultation response intend to help the applicant/examining authority mitigate against impacts and follow relevant policy including those that we have highlighted.

> ***National Policy Statement for Energy: Paragraph 5.4.53*** *'The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists'*

If the current proposals were approved, it is our view that deterioration to ancient woodland is likely to occur. The changes and measures identified in our consultation REP2-054 would help the applicant to avoid deterioration. This includes bigger and better-quality buffers, better woodland edge design and enhancement and more significant levels of woodland enhancement and creation.

> **EN-1 Overarching National Policy Statement for Energy Section 4.3.20 states** '*The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act.*'

This is referred to in Item 2 of our previous response (REP2-054). The proposed woodland created for this project (less than 5 Ha) represents a small proportion of the whole site (approximately 0.35%). The areas of woodland creation proposed also appear to be very small and limited to narrow strips spread across the site.

We also made the point that the new woodland proposed is unlikely to meet the Government's definition of woodland set out here: Definition of trees and woodland - GOV.UK :

> *'We will typically apply the following interpretation. To be considered "woodland", the site must meet all the following:*
>
> - *a minimum area of 0.5ha*
> - *a minimum width of 20m*
> - *a potential tree canopy cover of at least 20%*
> - *a canopy consisting of specimens that meet the definition of trees (see Section 3)'*

REP2-054 provides advice on meeting good practice woodland creation design. A greater extent of woodland creation that is well-designed and managed is encouraged as a more proportionate to the scale of development in the context of national targets, local biodiversity policies and targets (including the local nature recovery strategy) and could help to avoid the impacts to ancient woodland.

Our response to Question 2.8.14

In some respects, connectivity is likely to be improved due to the welcome premise of tree planting and new/extended hedgerows. However, we think that the loss of open space and loss/encroachment of woodland edge habitat would ***reduce*** connectivity for some woodland-species, particularly in terms of bats – as explained in our answer to question 2.8.7, which would degrade the condition of ancient woodland.

The application's Environmental Statement (Volume 3, Appendix 9.4) describe the bat assemblages found on site to be of at least national importance within and adjacent to the Project Site, including woodland species Bechstein's and Barbestelle's (Myotis species) described as 'Rarest Annex 2 species and very rare' (Table 4.1).

Studies by Szabadi et al 2023 (The use of solar farms by bats in mosaic landscapes: Implications for conservation - University of Bristol) and Tinsley et al 2023 (Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity - Tinsley - 2023 - Journal of Applied Ecology - Wiley Online Library) indicate that Myotis species of bats are particularly sensitive to PV solar farms, especially at the woodland edge where they will commute and forage. These studies highlight that at the solar panel woodland edge boundary, there is a great reduction in bat activity. This is part of a growing evidence base that suggests significantly larger buffers are required to avoid impacts on ancient woodland and on bats in particular, which are a key part of the woodland ecosystem. Increasing the buffer is likely to improve the chances of a healthy bat population being maintained and reducing the chances of negatively impacting the species associated with the ancient woodland which are an integral part of the woodland's characteristics and condition.

The Environmental Statement also states '*the mosaic of habitats within the Zone of Influence is considered to be of at least national importance. However, the area to be developed comprises species-poor fields, which are of much lower value for bats'*. While the species-poor fields may be of lower value for bats, studies such as the one above show that most bat species, especially Myotis spp will utilise open woodland edge. The undeveloped woodland buffers and edge need to be large enough and suitably designed and managed for it to provide functional habitat for woodland species including bats which are integral parts of the ancient woodland ecosystem. There are also expected to be cumulative impacts that would be caused by the loss of or encroachment on to such a large extent of open space and edge habitat.

Inclusion of better connectivity and habitat corridors can also help to promote diversity and healthy populations of other species groups such as birds. A study by Copping et al,. 2025 (Solar farm management influences breeding bird responses in an arable-dominated landscape) highlighted that well managed solar farms, which included areas of wildflower meadow, habitat corridors (e.g. hedgerows) and wooded areas, can have a

high diversity of bird species and biomass. Therefore protection, enhancement and creation of these features will benefit a wide variety of taxa, which can be considered as an integral part of a woodland ecosystem. This once again highlights the need for larger buffers, with greater ecologically focused enhancement, which will not only protect the woodlands directly, but will also benefit the species associated to them.

Given the reasons above and as outlined in REP2-054, our view is that significantly larger and well designed buffers with an enhanced woodland edge habitat and improved connectivity more broadly (through habitat creation and enhancement) is required to avoid degrading ancient woodland habitat.

Yours faithfully,

[redacted]

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