Date: 22 August 2025
Our ref: 502179
Your ref: EN010147

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BY EMAIL ONLY

Dear Sir/ Madam

NSIP Reference: EN010147

The Examining Authority's second written questions and requests for information (ExQ2).
Examining Authority's submission deadline: 22 August 2025

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England are pleased to provide our answers to the Examining Authority's second written questions. They can be found within the annex appended to this letter.

Natural England hopes our Deadline 4 answers are helpful and we will continue to work collaboratively with the Applicant to try to resolve any relevant matters.

For further advice on this consultation please contact the case officer [redacted] and copy to [redacted]

Yours faithfully

[redacted]
Senior Officer
Thames Solent Area Team
Natural England

Annex 1: Natural England's response to the Examining Authority's (ExA's) second written questions reference ExQ2

ExQ2	Question to:	Question and Answer:
Q2.8 Ecology and Biodiversity		
2.8.4	Applicant Natural England	***Ammonia Deposition*** *The ExA understand that ammonia deposition is under review between the parties. Provide an update and what steps are being undertaken to avoid, reduce or mitigate the effects.*
		In our answer to ExQ 1 (**1.12.2)** we stated that '*There is increasing evidence of the potential impacts from ammonia emissions from road traffic which were not considered when Natural England developed our NEA001 guidance.*'. This evidence is currently only preliminary. Natural England have not published updated guidance and we currently advise that NEA001 is used to assess potential impacts from air quality. We advised that a more precautionary assessment may be appropriate for this proposal and shared additional information on the potential impacts of ammonia deposition given the proximity to the AADT threshold. We understand the applicant is undertaking further work on this topic.
2.8.9	Applicant Natural England	***Skylarks*** *The Oxfordshire Host Authorities (OHA) and Cassington Parish Council (amongst others) note that the skylark plots to be provided are only intended to provide foraging areas. There is an alleged loss of nesting/ breeding skylark habitat by the proposed development that the interested parties (IP) consider to be adverse. The OHA suggest some 60ha of off-site land needs to be secured and maintained to support some 228 skylark territories. Provide comment on the request and the need for such mitigation.*
		Natural England agree that the provided mitigation plots are only likely to function as foraging areas and not be used for nesting/breeding. We understand that there are areas of archaeological mitigation areas which may also function as skylark breeding habitat.

ExQ2	Question to:	Question and Answer:
		Natural England will not provide bespoke advice on the mitigation requirements for impacted priority species unless they are also a notified feature of a SSSI, MCZ or habitats site or there is a functional linkage.
2.8.11	Applicant Natural England Environment Agency	***Monitoring mitigation*** *Applicant – What would happen if ecological monitoring found that a greater adverse effect was being had on a species (i.e. bats, breeding bird assemblage) than the ES envisages? What would the mitigation options be and where are they secured? Would panels be removed to lessen the impact?* *Natural England / Environment Agency – Please provide your comments on this matter and what monitoring would achieve without effective mitigation options being tabled or understood at this point in the DCO process.*
		As we understand it, there are two separate monitoring requirements proposed: a) generalised monitoring of habitat conditions and b) bespoke monitoring of bat populations. Generalised monitoring should be secured to ensure that the prescribed mitigation habitats are being managed in accordance with the relevant management plans, ensure the grazing regime is adequate or at the correct density, ensure that the hedgerow buffers have been maintained and cut on the appropriate rotation, monitor establishment of relevant vegetation communities etc.. This monitoring and assessment can provide a good indication of whether or not mitigation is likely to be functioning for the target species. It can allow for targeted changes or amendments to the management regimes in order to ensure mitigation is best delivered. Bespoke monitoring of the bat populations is recommended by Natural England. This bespoke monitoring will provide data on how the created 'bat buffers' are being used by the populations. It may help to better understand the impacts of solar installations on bats and may contribute to better understanding of the mechanisms of disruption. We expect that Botley West will act as a case study for solar developments in areas of ecological sensitivity for bats. Given the already collected baseline data, there is an opportunity for high quality analysis of the before and after use of the site by bats, and the effectiveness of the proposed mitigation.

ExQ2	Question to:	Question and Answer:
		Generalised monitoring is common best practice and required for most plans or projects implementing environmental mitigation. The bespoke monitoring is an opportunity afforded to this development proposal given its unique landscape scale mitigation strategy.
2.8.12	Natural England Oxfordshire Host Authorities	***Biodiversity Metric*** *In the applicant's rebuttal of the local impact report [REP2-026, page 37] the applicant provides reasoning for not applying a temporal multiplier to the biodiversity metric. Do you disagree and, if you do, what are the implications for the ExA's and the SoS' assessments?*
		As long as the phasing of the habitat is correct and created within one year then it is correct that the temporal multiplier does not need to be used. This phasing should be outlined in the oLEMP.
2.8.14	Forestry Commission Natural England	***Woodland fragmentation*** *The applicant has stated [REP2-026] that: "maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows." Given this statement, do you consider there the potential for fragmentation between woodland (and ancient woodland) areas to occur, or would the proposal provide betterment compared to the current situation?*
		Natural England have, for this proposal, been providing advice on the functional linkage of woodlands for bat species. We would agree that it is *generally fair* to characterise the increased buffers of hedgerows and water courses as a benefit, potentially allowing an expansion of woody/scrub species from the edge. However, when considering species impacts or the functional connectivity of woodland, there may still be site specific impacts from the project around certain 'pinch points'. For example, woodland species may be travelling between parcels of woodlands through what is currently open arable / pasture lands. These species may be prevented from doing so post-construction i.e. through fencing or panel avoidance.

ExQ2	Question to:	Question and Answer:
2.8.16	Natural England	***Biodiversity Net Gain vs loss of habitat*** *Many IP have queried whether BNG would actually be an effective replacement for the habitat (breeding and foraging opportunities) that would be lost to bats and breeding birds through the loss of arable land by way of the project. Do you have any views on this, particularly with regards to connectivity between existing established habitats and the distance to proposed BNG land?*
		Biodiversity net gain does not seek to address the needs of specific priority species. When assessing the impact of the projects on specific species, generalised net gain should not factor into the assessment of impact.
2.11 Geology and Land Use		
2.11.10	Natural England	***Agricultural land yield*** *At ExQ1.11.11 [PD-008] the ExA requested that Blenheim Estate provide further detail regarding which parcels of agricultural land to be included within the proposed development were degraded of nutritional and organic content. A response was received from Blenheim Estate at [REP2-067]. However various interested parties (IP's), including Professor David Sherratt at DL3 [REP3-112], have raised concern in respect of the information given in terms of accuracy. In order to assist the ExA, please review the initial question posed at ExQ1.11.1 by the ExA [PD-008] and the responses received and provide commentary.*
		ALC grade is based on inherent soil properties and has stronger weight in planning decision making compared to soil health. We would agree that the content of [REP2-067] does not focus on the ALC of the land parcels (but it does appear to answer the question posed in Q1.11.11). Natural England have based our advice on the ALC survey [APP-102] and have no further comments to make at this time.