



Planning
Inspectorate

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed Botley West Solar Farm

An Examining Authority report prepared with the support of the
Environmental Services Team

Planning Inspectorate Reference: EN010147

18 September 2025

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1 INTRODUCTION

1.1 Background

- 1.1.1 Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd ('the applicant') has applied for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed Botley West Solar Farm ('the proposed development'). On behalf of the Secretary of State for Housing, Communities and Local Government, an Examining Authority (ExA) has been appointed to conduct an examination of the application. The ExA will report its findings and conclusions and make a recommendation to the relevant Secretary of State (SoS) as to the decision to be made on the application.
- 1.1.2 For applications submitted under the PA2008 regime, the relevant SoS is the competent authority for the purposes of The Conservation of Habitats and Species Regulations 2017 ('The Habitats Regulations'). The findings and conclusions on nature conservation issues reported by the ExA will assist the SoS in performing their duties under The Habitats Regulations.
- 1.1.3 This Report on the Implications for European Sites (RIES) documents and signposts the information in relation to potential effects on European sites that was provided within the DCO application and submitted during the examination by the applicant and interested parties (IPs), up to deadline 5 (DL5) of the examination (12 September 2025). It is not a standalone document and should be read in conjunction with the examination documents referred to. Where document references are presented in square brackets [] in the text of this report, that reference can be found in the Examination Library published on the 'Find a National Infrastructure Project' website by following the link below:
- [Botley West Solar Farm - Project information](#)
- 1.1.4 For the purpose of this RIES, in line with The Habitats Regulations and relevant Government policy, the term 'European sites' includes Special Areas of Conservation (SAC), candidate SACs, proposed SACs, Special Protection Areas (SPA), potential SPAs, listed and proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on any of these sites. For ease of reading, this RIES also collectively uses the term 'European site' for European sites as defined in The Habitats Regulations 2017 and 'European Marine Sites' defined in The Offshore Marine Habitats and Species Regulations 2017, unless otherwise stated. The 'UK National Site Network' refers to SACs and SPAs belonging to the United Kingdom already designated under the Directives and any further sites designated under The Habitats Regulations.
- 1.1.5 This RIES is issued to ensure that Interested Parties (IPs) including the Appropriate Nature Conservation Body (ANCB) - Natural England (NE) - are consulted formally on Habitats Regulations matters. This process may be

relied on by the SoS for the purposes of regulation 63(3) of The Habitats Regulations.

- 1.1.6 It also aims to identify and close any gaps in the ExA's understanding of IPs' positions on Habitats Regulations matters, in relation to all European sites and qualifying features as far as possible, in order to support a robust and thorough recommendation to the Secretary of State.
- 1.1.7 Following consultation, the responses will be considered by the ExA in making their recommendation to the SoS and made available to the SoS along with this report. The RIES will not be revised following consultation.
- 1.1.8 Comments on the RIES are timetabled for DL6 (20 October 2025).

1.2 Documents used to inform this RIES

- 1.2.1 The applicant's Habitats Regulations Assessment (HRA) Report ('the HRA Report') comprised the following document(s):
 - Environmental Statement Appendix 9.14 Habitat Regulations Assessment Report [APP-163].
- 1.2.2 In addition to the HRA Report, the RIES refers to representations submitted to the examination by IPs, Issue Specific Hearing (ISH) documents, Statements of Common Ground (SoCG) and other examination documents as relevant. All documents can be found in the Examination Library.

1.3 Change Requests

- 1.3.1 To date, the applicant has made the following change request:
 - change request dated 31 January 2025 [AS-001]. Two changes, comprising a reduction in the redline boundary (0.015ha) and replacement of two areas of solar installation with archaeological protection and management areas (0.47ha).
- 1.3.2 This change was accepted by the ExA on 5 March 2025 [PD-005]. No relevant HRA matters arose from this change request.

1.4 HRA Matters Considered During the Examination

- 1.4.1 The examination to date has focussed on the following matters:
 - Noise and water quality impacts from piling during construction; and
 - Air quality impacts during construction.

2 LIKELY SIGNIFICANT EFFECTS

2.1 European sites considered

Introduction

2.1.1 The proposed development is not connected with or necessary to the management for nature conservation of any European site. The scope of the assessment is set out in section 1.3 of the HRA Report and identifies sites where there is a potential pathway for effect including:

- presence of a species for which the European site is designated, on the proposed development site
- where the European site is within 200 metres (m) of a road that may encounter increases in traffic flow as a result of the proposed development
- European sites with a possible hydrologic connection to the proposed development site
- European sites designated for the presence of mobile species such as bats or birds

Sites within the UK National Site Network (NSN)

2.1.2 The applicant's HRA Report [APP-163] identified two European site(s) within the UK National Site Network for inclusion within the assessment. These are:

- Cothill Fen SAC – 3.65 kilometres (km) from the proposed development
- Oxford Meadows SAC – 0.97km from the proposed development

2.1.3 The locations of these sites relative to the proposed development are depicted on figure 1 in Annex D of the HRA Report [APP-163].

2.1.4 No additional UK European sites have been identified by IPs for inclusion within the assessment in the examination to date.

2.1.5 The ANCB agreed [RR-0761] that all relevant European sites and or European site features that could be affected by the project had been identified by the applicant.

2.1.6 Only sites within the UK NSN are addressed in this RIES.

2.2 Potential impact pathways

2.2.1 Section 4 of the HRA Report details the potential impacts from the proposed development, along with the potential geographical extent of effects. Section 3 and Annex A, Tables 1 and 2 of the HRA Report listed the sites and qualifying features and the impact pathways which could affect them.

Table 2.1 Pathways for Likely Significant Effects (LSE) assessed by the applicant

European site and feature	LSE pathway
Oxford Meadows SAC - Lowland Hay meadows (<i>Alopecurus praensis</i> , <i>Sanguisorba officinalis</i>)	<ul style="list-style-type: none"> • direct damage to habitats • change in management regime • changes in air quality • changes in water quality • changes in hydrology • disturbance • spread of INNS
Oxford Meadows SAC – <i>Apium repens</i> creeping marshwort	
Cothill Fen SAC – Alkaline fens	
Cothill Fen SAC – Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> alder woodland on floodplains	

2.2.2 The HRA Report assessed the potential impacts during construction, operation and maintenance, and decommissioning.

2.2.3 No additional impact pathways have been identified by IPs for inclusion within the assessment in the examination to date.

2.3 In-combination effects

2.3.1 Section 2 of the HRA Report [APP-163] detailed the applicant's approach to assessing in-combination effects. The projects included in the in-combination assessment were detailed in ES Appendix 20.1 [APP-224], referred to in paragraph 2.2.6 of the HRA Report [APP-163] and their locations depicted on figures 20.1, 20.2 and 20.3 [APP-116; APP-117; APP-118].

2.3.2 No additional plans or projects have been highlighted by IPs in the examination to date.

2.4 The applicant's assessment

2.4.1 The applicant's conclusions in respect of screening are presented in section 4.9 of the HRA Report [APP-163]. They are summarised in the applicant's screening matrices in Annex A of the HRA Report [APP-163].

Sites for which the applicant concluded no LSE on all qualifying features

- 2.4.2 The applicant concluded that the proposed development would not be likely to give rise to significant effects, either alone or in combination with other projects or plans, on all qualifying features of the following European site:
- Cothill Fen SAC
- 2.4.3 Natural England [RR-0761] confirmed it agreed with the applicant's conclusion of no LSEs in respect of the above European site.

Sites for which the applicant concluded LSE on some or all qualifying features

- 2.4.4 The applicant concluded that the proposed development would be likely to give rise to significant effects, either alone or in combination with other projects or plans, on one or more of the qualifying features of:
- Oxford Meadows SAC
- 2.4.5 The qualifying features and LSE pathways screened in by the applicant are detailed in section 4.9 of the HRA Report [APP-163] and in its screening matrices [APP-163].

2.5 Examination matters

- 2.5.1 Matters raised to date, or those for which the ExA seeks clarity, in relation to LSEs screened out [or not considered] by the applicant are summarised in table 2.2 below.

Table 2.2: Issues raised in the examination to date by the ExA and IPs in relation to the applicant's screening of LSEs (alone and in-combination)

ID	Potential impact pathway	Details of issue	ExA observation / question
Oxford Meadows SAC / Cothill Fen SAC			
2.1	Noise disturbance impacts from piling - construction	<p>In ExQ1 [PD-008, Q1.12.1], the applicant and NE were asked to explain why piling was not considered a potential noise impact pathway.</p> <p>The applicant [REP2-025] stated that piling would occur at least 1.2km from Oxford Meadows SAC, and noise was excluded from further assessment due to this distance and the expectation that piling noise would be imperceptible compared to existing village and road noise. NE [REP2-057] confirmed that although Oxford Meadows SAC falls within the noise contours, its qualifying feature—lowland hay meadow—is not noise-sensitive. NE also confirmed that Cothill Fen SAC, located 3.65km away, has no noise impact pathway.</p> <p>In ExQ1 [PD-008, Q1.12.5] a discrepancy was highlighted in relation to the impact of pile driving as reported between Table 13.25 of the Environmental Statement (ES) and the HRA report where the impacts reported in the ES were of a larger magnitude than that reported in the HRA. The applicant clarified [REP2-025] that the thresholds in Table 13.25 of the ES represent a worst-case scenario, assuming the use of large piling rigs, which are unlikely</p>	N/A - matter resolved

		<p>to be required. This approach was described as highly precautionary.</p> <p>The applicant reiterated that the closest piling would occur approximately 1.2 km from Oxford Meadows SAC, and that noise disturbance was screened out based on this distance. NE [REP2-057] reaffirmed that the lowland hay meadow is not noise-sensitive and that Cothill Fen SAC, being 3.65 km away, is not affected by noise from the development.</p>	
2.2	Water quality impacts from piling - construction	<p>In ExQ1 [PD-008, Q1.12.1], the applicant and NE were asked to explain why piling was not considered a potential water quality impact pathway.</p> <p>The applicant [REP2-025] stated that the panel piles are small in area, shallow (1–3m), and unlikely to significantly affect groundwater flows. Risks to groundwater will be mitigated through appropriate site management under the outline Code of Construction Practice. NE [REP2-057] noted that while piled foundations were not specifically assessed, there is no evidence of harm to water quality from piling, which is considered standard practice for solar developments. NE also confirmed that Cothill Fen SAC is not hydrologically connected to the development area, so no impact pathway exists.</p>	N/A - matter resolved
2.3	Air quality impacts - construction	<p>ExQ1 [PD-008, Q1.12.2] queried why vehicle numbers rather than vehicle movements had been used to determine that the HGV Annual Average Daily Traffic (AADT) threshold of 200 vehicles had not been breached in either project alone or in-combination scenarios. It asked the applicant and NE whether a precautionary assessment approach should be taken regarding the in-combination assessment given that the AADT of 192 is very close</p>	Can the applicant provide an update at DL6 on the assessment of ammonia emissions from road traffic in relation to Oxford Meadows SAC?

		<p>to the 200-vehicle threshold, and it would not take much change in future vehicle trips for that threshold to be exceeded.</p> <p>The applicant [REP2-025] responded that vehicle numbers in the HRA are AADT movements and as such already account for two-way flows. The AADT figures assume worst-case assumptions for all projects included, and so the applicant considers them to be suitably precautionary and that no further assessment is necessary.</p> <p>NE [REP2-057] agreed that the in-combination scenario is very close to the screening threshold and that a more precautionary approach may be appropriate for this project, particularly in relation to ammonia deposition on the basis that potential impacts from ammonia emissions from road traffic were not considered when Natural England developed the NEA001 Guidance Note which is the guidance used for the HRA assessment. NE [REP4-072] confirmed that the applicant is undertaking further work on this topic.</p> <p>At D4 the applicant [REP4-037] stated that NE had been provided with a proposed methodology to undertake a precautionary assessment of changes in air quality at the Oxford Meadows SAC. The results of the assessment will be provided as a technical note and updated HRA to the Examination by Deadline 6.</p>	
2.4	Site improvement plans	<p>ExQ1 [PD-008, Q1.12.3] asked NE whether the project (alone or in-combination) would lead to any impediment to the delivery of the Site Improvement Plans cited in the HRA and, if so, how.</p> <p>NE [REP2-057] responded that it does not believe (subject to further information on air quality- please see ref 2.3 above) that the project would lead to the impediment of the Site Improvement Plans of Cothill Fen or Oxford Meadows SACs.</p>	<p>Following further updates as requested in relation to ref 2.3 above, can Natural England confirm its position in relation to whether it believes the proposed development would lead to the impediment of the Site Improvement Plans of</p>

			Cothill Fen or Oxford Meadows SACs.
2.5	Hydrological impacts from the creation of floodplain meadow – Evenlode River - operation	<p>ExQ1 [PD-008, Q1.12.4] asked the applicant and NE whether creating approximately 100ha of new floodplain meadow along the River Evenlode could affect the hydrology of Oxford Meadows or Cothill Fen SACs, for example by causing earlier water uptake and drying.</p> <p>The applicant [REP2-025] responded that Cothill Fen SAC has no hydrological connection to the project site, so its regime would not be affected. Regarding Oxford Meadows SAC, the applicant stated the new meadow aims to restore habitat along the River Evenlode and would complement the SAC's ecological function. It added that the SAC's hydrology is driven by the River Thames, not the Evenlode, and minor flow changes would not materially affect it. NE [REP2-057] welcomed further information but considered it unlikely that the new meadow would significantly alter the SAC's hydrology.</p>	N/A - matter resolved

2.6 Summary of examination outcomes in relation to screening

- 2.6.1 The ExA's understanding of the applicant's and NE current positions in relation to LSEs is set out above.
- 2.6.2 The applicant concluded that there would be no LSE on Cothill Fen SAC. This was not disputed.
- 2.6.3 The ExA and IPs raised queries during the Examination in relation to LSE on Oxford Meadows SAC. The applicant will provide information to address the outstanding queries from the ExA at DL6 (20 October 2025).

3 CONCLUDING REMARKS

- 3.0.1 This RIES is based on information submitted throughout the examination by the applicants and IPs, up to DL5 (12 September 2025), in relation to potential effects on European sites. It should be read in conjunction with the examination documents referred to throughout.
- 3.0.2 The applicant concludes that LSE can be excluded to the Cothill Fen SAC and Oxford Meadows SAC. The ExA's understanding of the applicant's and NE's positions in relation to LSE matters is set out above.
- 3.0.3 Comments on the RIES must be submitted for DL6 (20 October 2025).