

Botley West Solar Farm

STATEMENT OF COMMON GROUND -

Natural England

EN010147/APP/11.7/8

10 November 2025

NPI-12426 Statement of Common Ground -Natural England Rev 2 10 11 2025





Approval for issue

Jon Alsop 10 November 2025

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

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.





Contents

SIGN	IATUR	'ES	IV
1	1.1 1.2 1.3 1.4	DCO Reference	1 1 1
2	RELI	EVANT SUBMISSIONS DOCUMENTS AND PLANS	2
3	REC	ORD OF RELEVANT CORRESPONDENCE	7
4	ARE	AS OF DISCUSSION BETWEEN THE PARTIES	8
Table	es		
Table	2.1:	Draft DCO submission documents and plans record pursuant to Natural England discussions – Ecology and Nature Conservation	3
Table	2.2:	Draft DCO submission documents and plans record pursuant to Natural England discussions – Agricultural Land Use and PRoW	5
Table	2.3:	Draft DCO submission documents and plans record pursuant to Natural England discussions – Landscape and Visual Resources	
Table	4.1:	Areas of Discussion between the Parties – Ecology and Nature Conservation	
Table	4.2:	Areas of Discussion between the Parties – Agricultural Land Use and Public Rights of Way	16
Table	4.3:	Areas of Discussion between the Parties – Landscape and Visual Resources	16

Appendices

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



Senior Officer

Natural England

10th November 2025

SolarFive Ltd



Director of Project Development
For and on behalf of Solar Five Ltd.
Photovolt Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany

6th November 2025

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 accompany 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') 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:
 - a. Relevant submission documents and plans
 - b. Record of relevant correspondence to date
 - c. Matters that are agreed
 - d. Matters yet to be agreed
 - e. 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	CR2-004	Rev2/September 2025
EN010147/APP/2.6	Statutory and Non- Statutory Sites - Features of Nature Conservation Plan	<u>APP-009</u>	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	APP-010	November 2024
EN010147/APP/2.9	Statutory and Non- Statutory Features of Historic Environment Plan	<u>APP-012</u>	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	<u>AS-007</u>	February 2025
EN010147/APP/3.1	Draft Development Consent Order	<u>TBC</u>	Rev9/ November 2025
EN010147/APP/6.2	ES Volume 0, Non- Technical Summary	<u>APP-037</u>	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	REP4-010	Rev3/ August 2025
EN010147/APP/6.4	ES Volume 2, Figure 9.1Statutory Designated Sites	<u>APP-086</u>	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	<u>APP-087</u>	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	<u>APP-088</u>	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	APP-150	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	<u>APP-151</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	<u>APP-152</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	REP5-039	Rev 1/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	<u>APP-154</u>	P0/ November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	<u>APP-155</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	<u>APP-156</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	<u>APP-157</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	<u>APP-158</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	<u>APP-159</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	<u>APP-160</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	<u>APP-161</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	<u>CR2-040</u>	Rev2/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	REP6-022	Rev1/October 2025
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	<u>APP-164</u>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	<u>APP-165</u>	P0/ November 2024
EN010147/APP/15.6	Bat Technical Note	REP6-044	Rev 1/October 2025
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	<u>CR2-043</u>	Rev3/ September2025
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	REP6-028	Rev 5/October 2025
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	REP6-030	Rev 5/October 2025
EN010147/APP/7.6.2	Outline Operational Management Plan	REP6-032	Rev 5/October 2025

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	<u>REP6-034</u>	Rev 6/October 2025
EN010147/APP/7.6.4	Outline Decommissioning Plan	REP6-036	Rev 2/October 2025

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	Rev0/November 2024
EN010147/APP/6.3	ES Chapter 17 - Agricultural Land Use and Public Rights of Way	APP-054	Rev0/November 2024
EN010147/APP/6.4	ES - Figures 17.1, 17.2 and 17.6	APP-108, APP- 109 and APP-113	Rev0/November 2024
EN010147/APP/6.4	ES - Figures 17.3, 17.4 and 17.5	CR2-033, CR2- 034, and CR2-035	Rev 1/September 2025
EN010147/APP/6.5	ES - Appendix 17.1 ALC and Soil Survey Report	APP-223	Rev0/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	REP6-028	Rev5October 2025
EN010147/APP/7.6.2	Outline Operational Management Plan	REP6-032	Rev5/October 2025

Table 2.3: Draft DCO submission documents and plans record pursuant to Natural England discussions – Landscape and Visual Resources

Document/Pla n Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6. 2	ES Non-Technical Summary	APP-037	Rev0/Novemb er 2024
EN010147/APP/6. 3	6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment	REP6-012	Rev4/October 2025

Document/Pla n Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6. 4	Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer)	CR2-032	Rev0/Novemb er 2024
EN010147/APP/6. 4	Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter)	REP5-028	Rev1/Septemb er 2025
EN010147/APP/6. 4	Figure 8.1-8.3 Site Location	APP-067	Rev0/Novemb er 2024
EN010147/APP/6. 4	Figure 8.245: Regional Landscape Character	APP-069	Rev0/Novemb er 2024
EN010147/APP/6. 4	Figure 8.246: Local Landscape Character Areas	APP-070	Rev0/Novembe r 2024
EN010147/APP/6. 4	Figure 8.247: District Landscape Character Areas (including ZTV)	APP-071	Rev0/Novembe r 2024
EN010147/APP/6. 4	Figure 8.248 to 8.371: Photomontages (Winter and Summer)	CR2-032	Rev2/Septemb er 2025
EN010147/APP/6. 4	Figure 8.4-8.6: Landscape Resources Plan	APP-081	Rev0/Novembe r 2024
EN010147/APP/6. 4	Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview)	APP-082	Rev0/Novembe r 2024
EN010147/APP/6. 4	Figure 8.8: ZTV Section Overlaps (Whole Project Overview)	APP-083	Rev0/Novembe r 2024
EN010147/APP/6. 4	Figure 8.8a: ZTV Bare Earth	APP-084	Rev0/Novembe r 2024
EN010147/APP/6. 4	Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations	APP-085	Rev0/Novembe r 2024
EN010147/APP/6. 5	Appendix 8.1: Landscape Character	APP-143	Rev0/Novembe r 2024
EN010147/APP/6. 5	Appendix 8.2: Landscape Value	APP-144	Rev0/Novembe r 2024
EN010147/APP/6. 5	Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement	APP-145 to APP148	Rev0/Novembe r 2024
EN010147/APP/6. 5	Appendix 8.4: Photomontage Methodology	APP-149	Rev0/Novembe r 2024
EN010147/APP/6. 3	Figure 2.1a to 2.4d: Illustrative Masterplan	CR2-026	Rev2/Septemb er 2025

Document/Pla n Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.	Landscape, Ecology and Amenities	CR2-043	Rev3/Septemb
3.3	Plan		er 2025
EN010147/APP/7.	Outline Landscape and Ecological	REP6-034	Rev 6/October
6.3	Management Plan		2025

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

lef	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
.1.1	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Survey methodology	NE have not commented on the survey methodologies used beyond those topics described below.	Noted.	N/A.
.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 [REP2-012].	Agreed.	Agreed.
1.3	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Assessment approach and methodology	NE have not disagreed with 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 [REP2-012].	Noted.	N/A.
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.
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.
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. Note that additional work was undertaken with respect to changes in air quality and potential effects on the Oxford Meadows SAC reported in an updated ES Appendix 9.14 Habitats Regulations Assessment Report [REP6-022]. This also concluded no adverse effect on the SAC.	Agreed.
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	Updated Table 9.6.2 within Chapter 9 of the ES to be provided to include the relevant qualifying interest features. Deadline 3 Update: Updated ES Chapter 9 submitted at Deadline 2 [REP2-012] incorporating changes requested.	Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			showed 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. November 2025 Update: The full survey approach to assessing the use of the site by bats has now been carried out and the gaps identified above have been addressed. There has been identification of key flight lines and foraging areas and where this has not been possible assumptions have been made of other habitat links likely to or with the potential to provide important routes or resources.	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: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [REP5-039]) 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 [REP4-014] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going. October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at Deadline 5 [REP5-039] to include further static data and analysis of all radio tracking data to include home ranges etc. These data have been fully analysed with respect to key flight lines etc. both within the survey report and the Bat Technical Note also submitted at Deadline 5 [REP5-009].	Agreed
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	Updated Figures 2.1 and 2.2 ES Appendix 9.4 Bat Survey Report [REP5-039] at a higher resolution to be provided in the bat technical note.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
	F F		sampling points and the habitat areas, linkages or corridors that were surveyed.	October 2025 Update: The Applicant has submitted revised figures at Deadline 5 [REP5-039].	
			November 2025 Update: Improved reporting and mapping has now been provided to address these issues.		
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. November 2025 update: Discussed PBRA data with NE at meeting on 06/11/25. Metadata (tree species etc.) supporting the survey have been lost and as such are not available. However, the key issue with respect to bat roosts in trees is the potential for noise disturbance. All hedgerows with trees (i.e. those with roost potential) will have at least a 10m buffer, as set out in the bat buffer strategy in Section 8 of the oLEMP [REP6-034] and Bat Technical Note [REP5-009]. Also, the piling rig to be used will be small, a GAYK HRE 4000 WSP or similar. Noise generation by this model is limited to circa 110dB at 1m, reducing by circa 20dB at 10m distance. Also, piling in any one location would be for a short duration (e.g. >1min) such that noise around any particular tree would be very transient and the potential for roost abandonment due to disturbance limited. Notwithstanding this, in order to further avoid any potential impacts, the oCoCP has been updated at Deadline 7 to include that there would be no piling on both sides of a hedgerow simultaneously and that no piling will take place in more than one location alongside any particular hedgerow (section 1.10.19). NE agreed that, on the basis of the above, the PBRA data were not necessary as avoidance measures were in place.	Agreed
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 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	Full data with respect to the radio tracking to be provided in updated bat technical note. Such data 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. October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at Deadline 5 [REP5-039] to include further static data and a full analysis of all radio tracking data to include home ranges etc. These data have been fully analysed with respect to key flight lines etc. both within the survey report and the Bat Technical Note also submitted at Deadline 5 [REP5-012].	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
			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.		
			November 2025 Update: These issues have now been addressed within the updated bat survey reporting and analysis.		
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	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	Agreed
			interesting that no ringed bats were encountered during the trapping conducted, or this may be an omission in reporting.	October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at Deadline 5 [REP5-039] to include data from the Wytham Bat Project.	
			November 2025 Update: This issue has now been addressed in the updated bat survey reporting and analysis.		
	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	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.	Agreed
4.1.14			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	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.	
			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.	October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at Deadline 5 [REP5-039] to include further static data including paired sampling of open fields and hedgerows. These data have been fully analysed with respect to key flight lines etc. both within the survey report and the Bat Technical Note also submitted at Deadline 5 [REP5-012].	
			November 2025 Update: An assessment of the use of the open habitats has been conducted and provided in the updated bat survey reporting and analysis.		

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
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 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. November 2025 Update: The updated bat survey data has been used to create a plan of where the key habitat areas will be buffered and also establishing criteria for other buffered habitats. These principals will be used to inform the layout of the scheme.	The masterplan is illustrative and there is an existing commitment to incorporate appropriate buffers to all important bat flightlines (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [REP4-014] 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. October 2025 update: the Applicant has submitted a Bat Technical Note at Deadline 5 [REP5-012] that incorporates descriptions of how the Project will provide various buffers to ensure key features are protected. This includes woodlands, hedgerows and other features data show are used by bats. The location, nature and management of the buffers have been set out in the oLEMP submitted at Deadline 5 [REP5-045] to ensure it is secured via compliance with Requirement 6 of the dDCO [REP4-004].	Agreed.
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. November 2025 Update: Bat survey data has now been used to inform the parameters of the layout of the scheme and specifically criteria for and/or location of habitat buffers.	The location of the larger buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties. October 2025 update: the Applicant has submitted a Bat Technical Note at Deadline 5 [REP5-012] that incorporates descriptions of how the Project will provide various buffers to ensure key features are protected. This includes woodlands, hedgerows and other features data show are used by bats. The location, nature and management of the buffers have been set out in the oLEMP submitted at Deadline 6 [REP6-034] to ensure it is secured via compliance with Requirement 6 of the dDCO [TBC].	Agreed
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) [REP2-019] 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	The location and size of the appropriate buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties. October 2025 update: the Applicant has submitted a Bat Technical Note at Deadline 5 [REP5-012] that incorporates descriptions of how the Project will provide various buffers to ensure key features are protected. This includes woodlands, hedgerows and other features data show are used by bats. The location, nature and management of the buffers have been set out in the oLEMP submitted at Deadline 6 [REP6-034]	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
Rei	Relevant Application Document	Summary of Description of Matter	Natural Eligianu Current Position	survey report and the Bat Technical Note also submitted at Deadline 5 [REP5-012]. The technical note sets out descriptions of how the Project will provide various buffers to ensure key features are protected. This includes woodlands, hedgerows and other features data show are used by bats. The location, nature and management of the buffers have been set out in the oLEMP submitted at Deadline 6 [REP6-034] to ensure it is secured via compliance with Requirement 6 of the dDCO [TBC].	Status
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) [REP2-019], 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. November 2025 Update: Monitoring of bat usage of the site and roosting of Bechstein's bats post-construction has now been proposed and is committed to in the Bat Technical Report and oLEMP.	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. October 2025 update: the Applicant has submitted a Bat Technical Note at Deadline 5 [REP5-012] that includes details of monitoring of bat activity post construction. Details have been carried over into the oLEMP submitted at Deadline 6 [REP6-034] to ensure they are secured via compliance with Requirement 6 of the dDCO [TBC].	Agreed
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. November 2025 Update: Reporting has been updated to provide greater clarity	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.	Agreed.
				October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at	

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position	Status
				Deadline 5 [REP5-039] to include further static data including paired sampling of open fields and hedgerows. These data have been fully analysed with respect to key flight lines etc. both within the survey report and the Bat Technical Note also submitted at Deadline 5 [REP5-012]. The technical note sets out descriptions of how the Project will provide various buffers to ensure key features are protected. This includes woodlands, hedgerows and other features data show are used by bats. The location, nature and management of the buffers have been set out in the oLEMP submitted at Deadline 6 [REP6-034] to ensure it is secured via compliance with Requirement 6 of the dDCO [TBC].	
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 Management of buffer areas has been outlined in the Bat Technical Report.	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. October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at Deadline 5 [REP5-039] to include further static data including paired sampling of open fields and hedgerows. These data have been fully analysed with respect to key flight lines etc. both within the survey report and the Bat Technical Note also submitted at Deadline 5 [REP5-012]. The technical note sets out descriptions of how the Project will provide various buffers to ensure key features are protected. This includes woodlands, hedgerows and other features data show are used by bats. The location, nature and management of the buffers have been set out in the oLEMP submitted at Deadline 6 [REP6-034] to ensure it is secured via compliance with Requirement 6 of the dDCO [TBC].	Agreed.
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 [REP6-034]. November 2025 update: the oLEMP includes the	Agreed.
				indicative planting schedules for hedgerows at Appendix B [REP6-034].	
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.	Agreed.
			November 2025 Update: Updated report has addressed the errors.	October 2025 update: the Applicant has updated ES Appendix 9.4 Bat Surveys at	

Ref	Relevant Application Document	Summary of Description of Matter	Natural England Current Position	Applicant Current Position Deadline 5 [REP5-039] that corrects these	Status
				errors.	
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.	Agreed
				October 2025 update: Badger, GCN and dormice licences submitted to Natural England Wildlife Licensing Service.	
				November 2025 update : LONI for badgers received [REP6-050]. NE Licensing Team anticipate other LONIs may be issued post completion of Examination.	
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].	Agreed
				October 2025 update: Watercourse BNG assessment submitted at Deadline 6. This demonstrates that the Project will deliver at least 20% watercourse BNG.	

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.	1. Agricultural land use (RR-0761-017): 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. [PDB-006]	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 also like to stress the importance of cumulative landscape impacts from the development.	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 [REP6-012].	Agreed

Ref 4.3.2	Relevant Application Document Landscape and Visual Matters Clarification Note [EN010147/APP/15.3].	Summary of Description of Matter Clarification of response from Cotswolds National Landscape (CNL) Board.	Natural England Current Position As above	Applicant Current Position The Applicant has taken additional photography from the Cotswolds National Landscape (CNL) at the specific (additional) request of the ExA and the OHA's in its Response to the ExA Q2.1.4 – Annex 3: Explanatory Note Looking at the Special Qualities of the Cotswolds National Landscape [Annex 3 of REP4-037] despite the CNL Board stating:	Status Agreed
				"Having reviewed the applicant's DCO submission and visited the site and surrounding area, the Board concluded in our response dated 24 February 2025 that the proposed solar farm would have, at worst, a temporary negligible to minor adverse significance of effect at all stages of the project (i.e. construction, operation and decommissioning) on the landscape character and special qualities of the CNL and a temporary negligible adverse effect on views to and from the CNL." [REP2-068] (Applicant's emphasis).	
				The Applicant agreed to the ExA's request as if there were any views, these would have been experienced by high sensitivity visual receptors (people using PRoW) within a nationally designated landscape. However, as reported in Annex 3 of REP4-037, no views were available.	
				"The Board also considers that the 'new planting/areas for enhancement' on land between the solar PV arrays and the CNL have the potential to provide landscape enhancements which could be considered to contribute to furthering the purpose of CNL designation and should be secured as part of the Development Consent Order should, without	

prejudice, the Secretary of State be minded to grant such an order. As such the Board

considers that the impacts of the proposal would not represent an impediment in respect of

relevant authorities' adequate discharge of the s.85 CROW Act duty" (Applicant's emphasis).

The CNL Board's consideration that the duties

adequately discharged was not reported in the Applicant's Response to the ExA Q2.1.4 – Annex 3: Explanatory Note Looking at the Special Qualities of the Cotswolds National Landscape [Annex 3 of **REP4-037**]. The Applicant would like to take this opportunity to direct the ExA to the CNL Board's position and

under s.85 of the CROW Act had been

add this point to Annex 3 of REP4-037.

Appendix A Record of Relevant Correspondence

Date	Form of Correspondence	Topics Discussed	Outcomes
Ecology			
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.

Date	Form of Correspondence	Topics Discussed	Outcomes
		Impact of ground mounted solar on bats.	NE were currently considering the implications. Mitigation was discussed that NE would likely 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

Date	Form of Correspondence	Topics Discussed	Outcomes
			analyses to demonstrate accommodating bat mitigation.
		Bat habitat data.	Analysis of bat movements to be tied in with habitat data.
		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.
08/07/25	Meeting	Minutes still to be agreed but areas covered include:	
		 Overview of all bat survey work including that from May 2025 and activity data analysed to date. 	
		 Overview of Change Request 2 submitted at D2. 	
		 Proposed 25m buffer locations on key bat flightlines plus discussion on location and extent of other buffers. 	
		 Provision of bat technical note including contents. 	
		 Scope of potential air quality assessment in respect of Oxford Meadows SAC. 	
25/09/25	Meeting	Covered updates to bat work	Evolved further bat buffers and work to evidence them.
10/10/25	Meeting	Draft bat buffers and co- ordination of evidence	Further assessment of bat data to support evidence of buffer locations.

Date	Form of Correspondence	Topics Discussed	Outcomes
06/11/25	Meeting	SoCG and final bat buffers Discussed potential effect of noise on bat roosts in trees.	Agreed location of bat buffers. Agreed to provide amendments to oCoCP to ensure noise impacts avoided.
Agricultural La	and Use and Public Rig	hts of Way	
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.
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.
Landscape and	d Visual Resources		
Outline Landscape and Ecology Management Plan (oLEMP).	Email on the back of others.	Discussion on securing of masterplan, likely under oLEMP, which will be updated with bat migration. NE agreed with approach.	Bat mitigation secured through oLEMP as part of requirement 6 of the draft DCO.
NE 'lake effect' position.	Email on the back of others.	NE do not have a more recent position past their relevant published literature on the matter.	NE 'lake effect' position.