

Q1.7.1 General - review of deadline 1 documents: Review the updates to the application documents (see table 1 of the applicant's cover letter [REP1-001] for an overview of the updated documents) and the additional documents (see table 2 of the applicant's cover letter) submitted at deadline 1, the applicant's responses to the relevant representations [PDA-006] and confirm whether the comments or amendments have addressed your concerns regarding the impacts on biodiversity and ecology (as applicable). If the changes have not sufficiently addressed your concerns, set out how the documents could be further updated to overcome them.

BBOWT considers that all our concerns are still applicable and have not been adequately addressed. The responses provided by the applicant are generally dismissive of the concerns that we have previously raised and just repeats arguments which we considered were not sufficient in the submitted application, doing very little to satisfy our concerns over the potential impacts of the proposals on biodiversity in the area.

Q1.7.10 Surveys of Bechstein's bats: Provide a view on Natural England's position regarding the survey work for Bechstein's bats [RR-203, AS-038, REP1-124] – to what extent do you agree or disagree with this and why?

Please note that the answer to this question reflects the views of both BBOWT and the North Bucks Bat Group.

In line with previous comments made on the proposed development, BBOWT still holds firm that the location of the solar farm is fundamentally inappropriate and will result in substantial impacts to nature, particularly on Bechstein's bats and other bat species. As such BBOWT considers that Natural England (NE) should be going further with their comments and that they should be flagged as RED and that there are 'fundamental concerns', rather than AMBER, 'where further information is required' [RR-203, REP1-124]. This is in part because the applicant has not implemented the recommendations outlined by NE to remove fields B6, B7 and B8 from the panelled area, but also because the entire site is within the core sustenance zone and a significant area of the site is within the mapped home range of Bechstein's bats in the Bernwood area (see Figure 5 of Natural England's 2024 report titled 'The Bernwood population of Bechstein's bats') and there is the potential for a significant effect on the population (ES Volume 2, Chapter 7: Biodiversity [APP-050]) which BBOWT considers to be wholly unacceptable.

However, with regard specifically to the survey work undertaken for Bechstein's bats, BBOWT agrees with NE. We note NE's comments dated 12 December 2025 [RR 203], which draw on data collected for HS2 and shared to inform the potential Bernwood SSSI. These data identify the area between Sheepphouse Wood and Shrubs Wood as being of particular importance for Bechstein's bats, yet survey effort undertaken to inform the proposed development within this area has been very limited. Nevertheless, BBOWT agrees with the approach set out in NE's response dated 23 January 2026 [AS 038], namely that further survey work targeted specifically at Bechstein's bats would not be appropriate. Due to the difficulty of reliably distinguishing Bechstein's bats from other *Myotis* species using acoustic methods alone, such surveys would require invasive techniques such as trapping and radio tracking. Given the existing evidence demonstrating the importance of the area for Bechstein's bats, additional survey work would not alter the overall conclusions and would result in unnecessary disturbance to this fragile population.

In line with NE's recommendation, BBOWT strongly agrees that as fields B6, B7 and B8 are identified as part of the core sustenance zone and a key area of the home range for the Bernwood Bechstein's bats, panel allocations should be removed and that this area should continue to be managed as cattle-grazed pasture with enhancements incorporated to buffer zones.

Q1.7.19 Mitigation - woodland buffer distance: In your relevant representation [RR-020] and written representation [REP1-125] you suggest that a minimum buffer distance of 50 metres is required to designated woodland. Whilst noting the study referred to in your relevant representation, this does not represent guidance or a legislative requirement. The applicant has based the minimum buffer distance on guidance from Natural England and the Forestry Commission – why is this not deemed sufficient?

It is acknowledged that the applicant has provided a 30 m buffer from designated woodland, and that this is greater than the minimum outlined in guidance from Natural England and Forestry Commission (2022). However, BBOWT does not consider that this goes far enough to prevent degrading impacts of the solar farm on the functioning of woodland ecosystems and the species which depend on them, particularly bats such as Bechstein's bat. The Woodland Trust in 2019 published guidance for Ancient Woodland which states 'a minimum 50 metre buffer should be maintained between a development and the ancient woodland'. Furthermore, Policy NE8 in the Vale of Aylesbury Local Plan 2013-2033 states that buffers 'would generally be expected to be a minimum of 50m between the ancient woodland and any built development or grey infrastructure'. There has been no justification provided as to why a smaller buffer would suffice in this instance.

In addition to the above reasons in relation to impacts on ancient woodland, a 50 m buffer is considered by BBOWT the minimum necessary to limit impacts on the bats which depend on the woodlands as a roosting, breeding, foraging and commuting resource. Research by Tinsley et al (2023) has shown that the activity level of bats is substantially lower at solar farm sites compared to control sites. Furthermore, Barré and Baudouin et al (2023) report on a reduction in feeding behaviour and therefore likely reduced feeding habitat quality for bats at solar farms. New research on Bechstein's bats has also shown that individuals living in habitats with higher levels of urbanisation show an increased rate of biological ageing, demonstrating the impacts of anthropogenic environmental stressors (Brown, S. K. (2026)). These studies all indicate that the proposed development could potentially impact on bats natural use of the landscape and cause physical stress, and therefore solar panels should be as far away from the woodlands, the main resource for bats in the area, as possible, at a minimum of 50m (and in BBOWT's view should not be developed at all).

Barré, K., Baudouin, A., Froidevaux, J. S. P., Chartendraul, V., and Kerbirou, C. (2023). Insectivorous bats alter their flight and feeding behaviour at ground-mounted solar farms. DOI: 10.1111/1365-2664.14555

Brown, S. K. (2026) 'Anthropogenic influence on epigenetic ageing in a woodland bat' Bat Conservation Trust Woodland Symposium WWF Living Planet Centre, Woking, UK, 25th March.

Tinsley, E., Froidevaux, J. S. P., ZsebQk, S., Szabadi, K., and Jones, G. (2023) Impact of ground-mounted solar photovoltaic sites on bat activity. DOI: 10.1111/1365-2664.14474

Q1.7.24 Monitoring: Do you consider that you should be consulted on, and approve the details of any proposed monitoring of bat activity during the operation of the proposed development, including any monitoring reports and adaptive mitigation measures – justify your answer

Yes, it is considered that BBOWT should be a consultee on bat monitoring for the proposed development. BBOWT, as a local wildlife charity concerned with all aspects of nature conservation, is a key stakeholder in the proposed development. BBOWT has the experience and expertise to critique the details of the monitoring proposals and results to keep the applicant accountable. BBOWT can provide insights and knowledge to ensure optimal outcomes and only ever acts in the interests of nature, to achieve our vision of more nature everywhere, for everyone.

We provide a similar role for HS2, where we sit on the Ecology Review Group. We also participate in the Bernwood Sub-Group, focusing on the Bernwood bat licence which HS2 hold. These groups typically meet twice a year. As members of these groups BBOWT is informed about the approaches to monitoring and provides advice on best practice. We review annual reports on the monitoring activities undertaken for a number of protected species, including bats, and evaluate the results of these, providing expert opinion and recommendations on further mitigation actions or changes to approaches to deliver the desired outcomes.

BBOWT is of the mind that a group with a similar function should be established for the proposed development to ensure the applicant delivers as much as possible for the natural environment, and that BBOWT should be an integral part of such a group.

Use of AI

BBOWT has submitted a number of responses in relation to the application. No AI was used to prepare any of our substantive responses, including those dated 9 November 2023, 11 December 2023, 14 November 2024 and 12 December 2025.

Due to the length of our responses, we were required to submit a summary of our above responses which we did on 9 March 2026. Co-Pilot in Microsoft Word was used to assist in shortening our summary to within the permitted word count.