Botley West Solar Farm

Environmental Statement

Volume 3

Appendix 9.16: Section 42 Consultation Responses

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Glossary

Term	Meaning
The Applicant	SolarFive Ltd (SolarFive)
The Project	Botley West Solar Farm
The Developer: Photovolt Development Partners Gmbh	Photovolt Development Partners GmbH (PVDP).
Priority Habitats	Habitats listed as being of principal importance for conservation in England under Section 41 of the Natural Environment and Rural Communities Act 2006.
Priority Species	Species listed as being of principal importance for conservation in England under Section 41 of the Natural Environment and Rural Communities Act 2006.

Abbreviations

Abbreviation	Meaning
CTA	Conservation Target Area
ES	Environmental Statement
LWS	Local Wildlife Site
MAGIC	Multi-agency Geographic Information for the Countryside website
NE	Natural England
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

Units

Unit	Description
km	Kilometres
Ha	Hectares
M	Metres

1 Section 42 Consultation Responses

1.1.1 This Appendix of the Environmental Statement (ES) has been prepared by RPS on behalf of Photovolt Development Partners GmbH. (PVDP) for the Applicant, SolarFive Ltd. (SolarFive).

1.1.2 The purpose of this appendix is to present the Section 42 Consultation Responses relevant to Chapter 9: Ecology and Nature Conservation in Volume 1 of the ES **[EN010147/APP/6.3]**.

1.1.3 The Section 42 Consultation Responses are presented in **Table 1** below.

Table 1 Section 42 Consultation Responses relevant to Chapter 9: Ecology and Nature Conservation of the ES.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Cumulative impact, Ecology, Landscape	When the proposal is looked at alongside proposals for a solar farm close to Otmoor, Manor Farm at Denchworth, Red House Farm near Botley and other solar farms in our area, given the lack of definitive research and evidence on the impact of solar farms on aquatic birds and invertebrates, it seems a colossal experiment is being carried out on our local nature. We want to see much more evidence on the potential impact of the plans on wildlife and the mitigation to be put in place.	Yes	The effects of the Project on ornithology and invertebrates are assessed in ES Chapter 9: Ecology & Nature Conservation [EN010147/6.3]. The proposals are also supported by an Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	Whilst there is a lot of information and detail available in relation to the surveys carried out, we consider there to be a concerning lack of detail on the potential impact of the proposals on wildlife and the proposed mitigation. We consider the plans lack ambition to improve the area for wildlife and there is a lack of evidence available on the large number of risks posed to the local natural environment. We are particularly disappointed in the lack of ambition to create habitats amongst the panels.	Yes	As set out in the oLEMP [EN010147/APP/7.6.3], the majority of the Project site will now be managed through conservation grazing to enhance the overall ecology of the area. Grassland habitat will be created underlying panels (this approach has been welcomed by Natural England) with Skylark plots scattered throughout panelled areas. Panelled areas will be bounded by meadow grasslands and hedgerows (with and without trees). Invertebrate, bird and bat boxes will be included in these areas. The remainder of the landscaping scheme will see further suitable habitat creation

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				and enhancements on a large scale.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	Whilst we understand the need for greater renewable energy, we have significant concerns over the scale of the plans and do not believe the information available demonstrates that the project can proceed without substantial risks to nature. It is important that the impacts of new solar farms on the local environment are properly assessed and areas of existing high wildlife value habitat are avoided. We are concerned that given the scale of the proposed Botley West Solar Farm, the lack of comparable solar farms in terms of size and the limited research into the effects of solar farms of this scale on the local environment, the true nature of the potential impact of the proposals on the local environment cannot be adequately ascertained.	No	The Applicant notes this comment.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	As a wildlife conservation focused organisation, our comments refer specifically to impacts on species and their habitats which may occur as a result of the proposed development.	No	The Applicant notes this comment from BBOWT about their remit.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We note that the surveys carried out show a large number of red-listed species. A number of these species would be adversely affected by the proposals and not co-exist in the same area as	Yes	Impacts to breeding and wintering birds are fully assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		the panels. Covering such a large area in solar panels would have a significant negative impact on farmland birds. The impact of the change of management of the site on farmland birds must be fully assessed, particularly on ground-nesting birds such as skylark. We note that the proposals now include skylark plots but we have been unable to ascertain where they would be located. If the plots are to be located amongst the panels then we have serious reservations about their effectiveness as we consider that skylarks would avoid areas where solar panels would be present. The impact on wintering birds which tend to gather in large open arable fields such as lapwing and golden plover should be considered if they have been present in the fields concerned. Such a huge solar farm could potentially cause huge damage to local bird populations so the risks need to be fully assessed.		Conservation. Wintering bird and breeding bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.10 of the ES. Skylark plots are incorporated to provide additional foraging habitat. Additional areas of farmland have been removed from the scheme shown at PEIR, to be managed for farmland bird benefit.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	A further area of concern is the "lake effect", particularly for birds and insects. Natural England information note (Natural England Technical Information Note TIN101 Solar parks: maximising environmental benefits) states: "Solar parks can affect wildlife where they are near sites of high wildlife value…..There are some indications that very large, unbroken expanses of uniform solar panels may mimic water surfaces on which insects may attempt to settle and breed……..Some birds and invertebrates are also likely to be affected by solar parks developed close to areas of high wildlife value. Where a solar park is proposed within or close to such sensitive sites, the planning application should	Yes	Natural England's Technical Information Note TIN101 Solar parks was considered in the assessment of impacts on wintering and breeding birds. Impacts on wintering and breeding birds are addressed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES. Impacts due to the 'lake effect' on ecology receptors have been considered within the ES.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		include a detailed assessment of the likely impacts on the ecological interest of the sites and contain practical measures which avoid or minimise any adverse effects on their features of interest. Any solar park close to a designated site will need to demonstrate that it would not compromise the objectives of the designation."		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	The potential risk to birds and invertebrates is increased by the close proximity of the proposed solar farm to water bodies such as Cassington Gravel Pits (200m), Farmoor Reservoir (adjacent), and several rivers, such as the Evenlode and Thames. We do not believe it is possible to install panels in such close proximity to Farmoor without harm being caused to certain species. If, despite this, the proposal does go ahead so close to Farmoor Reservoir and Cassington Gravel Pits then much more buffering would be needed between the panels themselves and these sites. There is particular risk with the southern site, as it almost touches Farmoor Reservoir, that the fields of panels and reservoir could look like one large lake to birds. Additionally, steps would need to be put in place to prevent the "lake effect" within the fields such as adequately spacing out the panels and researching the effectiveness of panel coatings at preventing collisions with the panels and invertebrates laying eggs on them leading to	Yes	Impacts due to the 'lake effect' on ecology receptors have been considered within Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES.

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		mortality. However, at the moment we have no confidence that a solar farm of this scale could be developed in such close proximity to the water bodies identified above without risking wildlife at the sites. We raised this point in our first response and it does not appear to have been addressed. The developer should publish their evidence as to why the lake island effect is not a risk with the current proposals or what mitigation they will put in place to address the risk. Possible impacts of the 'lake effect' include: a)birds mistaking a large area of solar panels to be a lake and attempting to land on them. For some water birds this could be critical since they struggle or are unable to take off from non-water surfaces; b)birds and bats that feed on the wing mistakenly attempting to feed from the panels, with possible collisions and mortality; c)low-flying birds colliding with the panels or being confused by reflections in the same way as birds are confused by reflections from windows of buildings, and colliding with the panels, resulting in mortality; d)attraction of aquatic insects to the panels. a. A Natural England (2017) evidence review states: "Photovoltaic panels have been shown to reflect polarised light that is attractive to polarotactic aquatic insects, which confuse solar panels with water and attempt to lay eggs on the surface, resulting in mortality and reproductive failure"; b. A review by BSG Ecology (2019) describes in paragraphs 2.8 – 2.10 research into the possible impact of solar farms on aquatic invertebrates. It		

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		concludes by saying that: "The authors suggest that, until more research on a variety of species has been carried out, a more sensible approach would be the strategic deployment of solar panels away from water-bodies in temperate regions."		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	The site currently outlined for development as the Botley West Solar Farm is 1,400 hectares. 400 hectares have been set aside as a mitigation and enhancement area, which means the biggest impact of the development will come from the 1,000 hectares to be covered in solar panels and other infrastructure. For this reason it is important that if the solar farm does proceed, the biodiversity enhancements are not limited to the "mitigation and enhancement area" but are also embedded in the design of the 1,000 hectare panelled area.	Yes	Biodiversity enhancements are embedded in the Project masterplan, including the panelled area. The Biodiversity Net Gain (BNG) plans for the Project are outlined in the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is provided in [EN010147/APP/7.6.3]

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Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	For example, we note that wildflower grassland is to be planted under existing power lines. However, there is no detail on how the panelled fields which make up the majority of the site will be planted. We understand there is currently no intention to plant species-rich wildflower grassland amongst the panels. The developer should revisit this position. The community leaflet says the intention is to keep the panels as low as possible whilst allowing opportunities for sheep grazing. Whilst we support the mixed use of land, the developer should research the successes of other solar farms in planting wildflowers alongside solar panels. Research should be carried out so that the height of the panels and the spacing between them allows sufficient light underneath to support species rich grassland. Conservation grazing in large parts of the site should also be explored to provide varied habitats.	Yes	The Applicant has engaged Natural England on this position, and intends for grassland habitats to be created within panel arrays. The Project Description at Chapter 6 of the ES [EN010147/APP/6.3] also explains the Applicant's intention to operate conservation grazing across much of the Project Site. The Applicant notes the remaining points made, and the approach to meadow management, including a planting palette, is set out in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	The Preliminary Environmental Information Report states that "areas under and around the panels will develop vegetation that is fit for grazing by sheep or can be cut back to produce compost. In areas not affecting power generation vegetation growth will be facilitated to improve biodiversity." More detail needs to be provided on what is meant by "vegetation growth" and the areas that will not affect power generation. The developer should explore methods of facilitating grassland to increase biodiversity under and around the panels in a way that will not affect power generation, rather than disregarding the	Yes	More detail on the objectives and specifications of created and enhanced habitats, including meadow and hedgerow management, within the Project site are presented in the Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] and the Outline Operational Management Plan [EN010147/APP/7.6.2].

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		option for biodiversity enhancements under and around the panels. As the largest (as far as we know) solar proposal in the UK, if the proposal does go ahead, it must be exemplary in terms of doing everything possible to achieve the most species-rich grassland it can amongst the panels. At the moment the proposals fail to do this. Numerous ponds should also be provided in the margins around the panels to encourage colonisation by amphibians, reptiles and invertebrates. Hedgerows around the panels should be managed so as to maximise their benefits for wildlife, with rotational trimming at not less than a three-year interval, and also trimming further out so as to allow the hedgerows to slowly grow out in size. This management in and around the 1,000 ha of panels should all be additional to the biodiversity provision proposed on the other 400ha of land.		
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	As well as managing the space under and around the panels in a way to promote biodiversity, it is vital that all existing trees, hedgerows and woodlands are protected and the impacts of a solar farm on such features and habitats are known. We understand there is published concern around the impacts of solar farms on bat populations. As the area neighbours ancient woodland (see map)1 which often supports bat populations, we are particularly concerned about the impact of the proposals on bat populations.	Yes	Trees, hedgerows and woodlands have been protected with the exception of some limited areas of hedgerow removal required for vehicular access points and visibility safety splays. The impacts of the project on bats are assessed in ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Bat surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.4 of the ES. Following discussions with Natural England, the buffers for any important bat habitat will be set at 25m.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We are seriously concerned that important bat habitats and populations will be fragmented and that the solar panels themselves will also deter bats from using their natural habitat. New 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. The causes for this are unknown and further research must be carried out. It is possible this could be related to loss of suitable habitat, fewer insect prey available, impacts on echolocation, and collision risk with the panels.	Yes	The Applicant notes this comment. The implications of this research and the implications for the Project have been considered in detail during both pre-application consultation with Natural England and subsequently in the Project design commitments. Appropriate buffers will be included within the final design along all important bat foraging/commuting corridors. Such corridors are being identified through the use of project-level radio tracking. Data are reported in ES Appendix 9.4 Bat Surveys [EN010147/APP/6.5].

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Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We are concerned that the middle section in particular of the proposed solar farm will create a break between areas of ancient woodland which could otherwise be improved for connectivity. Areas of ancient woodland should be connected with large areas of mosaic habitat of woodland, scrub, species rich grasslands and ponds. The two main groups of ancient woodlands (South of Bladon and East of Farmoor) should be connected and managed for nature. The panelled areas appear to go within 15m of the edge of ancient woodland which is unacceptable. Buffers for ancient woodland must be greatly increased or panels simply not put in the proximity of ancient woodland. As a minimum we suggest buffers of 50m around ancient woodland to minimise detrimental impacts on species present in such woodlands, such as bats.	No	Ancient woodland will have a minimum 15m buffer and minimum 25m buffer if identified to support important bat populations. These distances of buffer, shown on the Illustrative Masterplans [EN010147/APP/6.4] are considered minimum distance sufficient to ensure impacts to such features are avoided.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We also propose that larger wildlife corridors are placed around the fields so that bats can forage along such corridors.	Yes	Noted. The implications of this research and the implications for the Project have been considered in detail during both pre-application consultation with Natural England and subsequently in the Project design commitments. Appropriate buffers will be included within the final design along all important bat foraging/commuting corridors. Such corridors are being identified through the use of project-level radio tracking. Data are reported in ES Appendix 9.4

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Bat Surveys [EN010147/APP/6.5].
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	In terms of the mitigation and enhancement areas, we will review proposals for such areas when more detail is published. However, we trust the developer will consult with local conservation organisations and ensure proper management plans are put in place. The larger mitigation area should be managed as a nature reserve by an organisation with considerable experience in nature reserve management. It should be managed with the aim of becoming initially an LWS, and ultimately with the aim of becoming a SSSI. It should therefore be given over in perpetuity for wildlife management with the aim of creating one of the largest and most wildlife rich nature reserves in Oxfordshire. Managed public access should be permitted along some footpaths and viewing areas, to encourage people to connect with nature, but large areas should be off-limits to access to allow species that do not tolerate recreational disturbance, such as the curlew, to thrive.	N/A	The Applicant notes this comment from BBOWT about their intention to further review the DCO submission proposals. The Applicant will continue to liaise with Natural England and local conservation organisations, and notes the request for the opportunity to create a LWS to manage components of the site, including the opportunity for managed public access. This will be reviewed further during the examination period, including liaison with the land owners.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	We also note that the community leaflet states that "following the end of Botley West's operation, the solar equipment will be removed, and the site will be returned to agricultural use." Biodiversity enhancements and new habitats created in the mitigation and enhancement areas must be	No	The Applicant notes this comment. The Project is seeking approval for a 42 year period during which time the solar farm will be

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		maintained and long term funding provided to ensure they are managed in perpetuity.		constructed, operated and decommissioned. As such, following the operational lifetime of the Project, the land would be reinstated to its original use. Reinstatement would be undertaken in accordance with procedures set out in the Outline Soil Management Plan [EN010147/APP/7.6.1]. However, the Applicant acknowledges the importance of the biodiversity and landscape enhancements which will endure beyond the decommissioning of the Project, and does not intend to remove the landscape mitigation planting, which will generate long term ecological benefits.
Berkshire Buckinghamshire & Oxfordshire Wildlife Trust	Local ecology	Security fencing, or tall fencing such as deer fencing, and security lighting if included in the proposal would also be a great concern. Fences can have an impact on connectivity, since many mammals will not be able to pass them, and lighting should not be permitted at all as the impact in a rural area on wildlife would be significant.	Yes	All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. A lighting strategy, to minimise the impacts of lighting in accordance with the Institute of

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		The proposed solar farm must also not restrict people's access to nature or their enjoyment of the countryside. Walking along footpaths through farmland with hedgerows is an entirely different experience to walking alongside security fences, security lights (themselves a threat to nature), security cameras, and panels and people's engagement with and appreciation of nature must be factored in to plans. From the information that has currently been made available to us, we understand that deer fencing around 2.1m high might be erected around all the panels. Such fencing would significantly alter the character of the area in terms of people's experience of walking in the area. It would also pose a collision risk for birds and damage connectivity of habitats for wildlife. As well as the fences resulting in the loss of ecological connectivity, the presence of solar panels over such a large area creates a barrier in itself. Some species would avoid areas of solar panels and therefore the fields would become barriers to them. This matter must be addressed and wide corridors (of much greater width than the already proposed field margin areas) of mosaic habitat (woodland, scrub, species rich grasslands and ponds) put in at numerous locations to break up the panelled area and thus reduce this impact on connectivity.		Lighting Professionals / Bat Conservation Trust guidelines, will implemented, as set out under the Outline Code of Construction Practice [(EN010147/APP/7.6.1]. Furthermore, no lighting will be permanently switched on. Emergency lighting will only be used, and operated manually. The impacts of habitat severance, connectivity between habitat areas, and the effects of lighting are assessed for all Important Ecological Features in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Consideration of people's access to nature, in terms of the experience and enjoyment of the countryside, is assessed in Chapter 16 Human Health, and in the Socio Economic Chapter 15, including effects on tourism and visitors. [EN010147/APP/6.3] Footpath user surveys were also conducted in the summer 2024, and are reported on in the ES in these Chapters and Chapter 17

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				on the use of Public Rights of Way.
Bladon Parish Council	Local ecology	Due to the lack of information at this stage, such as no baseline assessment and no agreed biodiversity metric, it is not possible to understand how the development will be able to create 70% biodiversity net gain (BNG), especially as, at the moment, the only suggestions are bat and bird boxes, bee hives and log piles.	NA	The Biodiversity Net Gain Assessment is provided in Volume 3, Appendix 9.13. [EN010147/APP/6.5] It is intended that the Project will have a gain of at least 70% Habitat BNG. The Defra Statutory Metric has been used to demonstrate net gain. The outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.
Bladon Parish Council	Local ecology	At various points in Chapter 9 - Ecology and Nature Conservation, the land within the proposal is referred to as 'intensive managed agricultural fields'. BPC would like the ES to explain how they have assessed that land as intensively managed.	NA	This is in reference to majority of the arable fields within the site being of 'intensive agriculture' as defined within the Cambridge Dictionary.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		The farmland around Bladon has not been managed intensively and been managed in such a way that the ecosystem is flourishing in the area.		The baseline condition of the habitats on site is set out in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] and associated appendices [EN010147/APP/6.5]. As shown in ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5], the Project will deliver over 70% habitat net gain demonstrating the uplift in ecological value associated with it, compared to that baseline.
Bladon Parish Council	Local ecology	Although the PEIR covers the possible impact on certain wildlife it only concentrates on the species that have been identified as important and does not consider the impact on other wildlife in the area such as deer and foxes.	No	The scope of survey work was agreed with Natural England during pre-application consultation. Deer and foxes are not of conservation concern and therefore do not require assessment. However, as deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.
Bladon Parish Council	Local ecology	BPC also request the negative impact on the larger wildlife be considered in the relevant Environmental Statement (ES) and that mitigation be provided to prevent the loss of this wildlife from the area.	No	Species of conservation concern have been included in the ES. General mitigation for wildlife is included in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.
Cassington Parish Council	Local ecology	It is noted that consideration has been given to the importance of Long Mead Wildlife Site and that Horizontal Directional Drilling is planned for the cable route (as opposed to more damaging methods) which appears to be beneficial. Method statements would highlight potential risks if provided.	Yes	The cable route has been amended to avoid the LWS with HDD now planned from undesignated fields, under the flood meadows and the Thames.
Cassington Parish Council	Local ecology	The land of the Parish of Cassington comprises a mosaic of habitats including farmland, hedgerows, tree lines bordering fields and tracks, woodland and river valleys and associated flood meadows. This mosaic of habitats leads to a rich and diverse fauna and flora significant elements of which will be severely degraded or even lost as a result of this scheme. This is because many	Yes	The impacts of the Project on Important Ecological Features are fully assessed in the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation, with suitable mitigation proposed to be implemented where necessary,

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		elements of the wildlife, especially birds require farmland in rotational cropping, along with hedgerows and other landscape features to thrive. As demonstrated by the PEIR the land in questions hosts healthy populations of Red Listed birds (e.g. yellowhammers, linnets and corn bunting), bats, badgers, hares and other wildlife. The mitigation measures laid out by the PEIR are inadequate to compensate for the massive loss of habitat for these animals where they are sensitive to the presence of solar arrays and other infrastructure. Furthermore, important elements of the environmental mitigation plans are missing from the PEIR, including the Biodiversity Net Gain Report and the Environmental Management Plan. The latter is particularly important in understanding the management of mitigation measures throughout the lifetime of the scheme. Cassington Parish Council therefore regards this scheme as having significant impacts on wildlife over a large area of the Parish and wider area of the proposed solar power station.		such as additional hedgerow and tree planting, and skylark plots. The Biodiversity Net Gain Assessment is provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. It is intended that the Project will have a gain of at least 70% Habitat BNG. The Defra Statutory BNG Metric has been used to demonstrate net gain. An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1. The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.

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Cassington Parish Council	Local ecology	The region around the Thames, Evenlode and wider area has the potential for considerable restoration activity and further national-level designation at the highest level for nature conservation and landscape preservation. The countryside around Cassington is included in the current Nature Recovery Network for Oxfordshire. We believe that the development of the Botley West Utility-Scale Solar Power Station, despite ideas being put forward of a nature corridor along the Evenlode by the developers, will actually prevent such nature recovery activities from reaching their full potential and will damage wildlife dependent on a mosaic of habitats including farmland. This opportunity cost is not considered by PVDP or their consultants. Such nature restoration plans could also be coupled with a wider network of footpaths and cycleways, community solar and other forms of sustainable living in a much more effective and inclusive manner than is offered by the current proposal. As such, if adopted, Botley West would represent opportunity loss rather than gain for the people of our Parish and Oxford City and Oxfordshire as a whole.	No	The Applicant notes this comment, and has been in discussions with the Evenlode Catchment Partnership, Natural England and the host authorities, including in regard to nature recovery network opportunities that the development can bring. The proposals for a landscape scale managed area in the Evenlode Valley part of the Project site is a direct reflection of this, and has been part of the Applicant's overall ambition since the earliest stages of the work, and prior to the first phase of consultation.
CPRE Oxfordshire	Cable routes	CPRE Oxfordshire strongly opposes any cabling route that would compromise the Long Mead Wildlife Site and other nearby SSSIs. This ancient floodplain wildflower meadow comprises some of the rarest habitat in the UK, 98% of which has been lost in the past 100 years. The remaining fragments now together comprise only 4sq miles in the UK.	Yes	Long Mead Meadow has been removed from within the Project site with the proposed HDD now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.

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				Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow. No significant effects are proposed to nearby SSSIs.
CPRE Oxfordshire	Local ecology	What is clear is that the land in question provides a rich mosaic of habitat, including farmland, hedges and woodland (incl. Ancient woodland) and rivers. As one would expect, it is therefore rich in biodiversity. The wildlife surveys of reptiles, wintering birds and badgers indicate that actually the land affected is of considerable importance in the wildlife it supports. Badger activity is particularly concentrated in the central section. The bird survey indicates the land is of importance to many red-listed and amber listed species, such as yellow hammers and linnets. The bat survey shows very high numbers of bats especially over the land north of Cassington.	No	The effects of the Project on ecological features of importance, conservation species, biodiversity and habitat are assessed in detail in ES Chapter 9: Ecology & Nature Conservation, and its appendices [EN010147/6.3].
CPRE Oxfordshire	Local ecology	How comparisons of benefits will be made – will Biodiversity Net Gain benefits be assessed on the basis of how the agricultural land has been previously managed, or against how it could be managed (e.g. regenerative farming, introduction of Environmental Land Management Schemes, ELMS)	Yes	The baseline with respect to BNG is set out in ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5]. The baseline used in the assessment is as the Project site was found during surveys between 2022 and 2024. It is not possible to assess the Project against hypothetical

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				scenarios of future management as there is no method to quantify how those would look.
CPRE Oxfordshire	Local ecology	The ecological isolation that would be caused by over 100km of fencing. We note that Thames Valley Police are now calling for high security fencing at all large-scale solar installations to help combat rural crime.	No	All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. As well as deer fencing, other methods of security will be used including cameras and PIR-triggered lighting. These help avoid the need for high-security fencing and the visual impacts associated with it.
CPRE Oxfordshire	Local ecology	Buffers and connectivity – in particular, the buffer zones for Ancient woodlands still look to be inadequate, and more thought should be given to connectivity between these areas.	No	Ancient woodland will have a minimum 15m buffer and minimum 25m buffer if identified to support important bat populations. These distances of buffer are considered minimum distance sufficient to ensure impacts to such features are avoided.
CPRE Oxfordshire	Local ecology	Impact of cabling route on the extremely rare ancient wildflower floodplain meadows around Swinford	Yes	Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow.

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				Long Mead Meadow has been removed from within the Project site with the proposed HDD now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.
CPRE Oxfordshire	Local ecology	The ability to deliver an extensive wildflower area under the panels. What commitments will be made in terms of avoid of use of herbicides?	Yes	The Applicant has prepared an outline Landscape and Ecology Management Plan (oLEMP) [EN010147/APP/7.6.3], which sets out that habitat management will be restricted to weed control and will be targeted using weed wipes etc.
CPRE Oxfordshire	Local ecology	The claims re sheep and grazing – our information from industry insiders is that despite all the promises, the use of sheep rarely lasts more than one season, as they are curious and disruptive (eating cables, escaping etc).	Yes	Sheep and Cattle Grazing is a key part of the Project, maintaining agricultural use and the BNG commitments. The oLEMP Table 11.1 Grassland Management Specifications sets out more details [EN010147/APP/7.6.3]. The Applicant commissioned a Land Care Proposal from Savills Food and Farming. The proposal is based on commercial sheep farming includes approximately 2,250 sheep grazing across the whole site. The proposal includes full responsibility for all land care including hedge and tree management.

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CPRE Oxfordshire	Local ecology	Our view is that the scientific evidence on the biodiversity benefits of large-scale solar farms is still patchy and contradictory. Notwithstanding CPRE Oxfordshire's overall opposition to Botley West, if it were to receive consent, we would consider it vital that a full-scale, robust and independent scientific survey were put in place so that lessons could be fully learnt and appreciated.	No	It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain. The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.
CPRE Oxfordshire	Local ecology	Development on this scale would have a radical impact on local ecology. Providing a few plots for growing local food would do little to replace the agricultural land which would be lost, much of which has been identified as 'Best and Most Versatile' land which should not be built on. Over three quarters of the land in question is also in the Oxford Green Belt, which is valued precisely because of its openness and permanence.	Yes	The impact of the Project on agriculture is considered in Chapter 17 of the ES (Agricultural Land Use and Public Rights of Way) [EN010147/APP/7.6.3]. Planning Policy is considered within Planning Supporting Statement (PSS), including Green Belt Case, which sets out the Very Special Circumstances in Appendix 8 [EN010147/APP/7.1].

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Environment Agency	Cable routes	Issue Open trenches during cable laying pose a risk to wildlife by entrapment. Impact Risks to ecology in particular protected species – otter and water vole during cable route installation. Solution No open trenches should be located within a 10m buffer zone for all watercourses.	Yes	All watercourses now have minimum 10m buffer, adhering to Local Authority requirement and in compliance with EA minimum requirements. Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses from outside of these buffers.
Environment Agency	Cable routes	Issue Potential risk of bentonite breakout within the riverbed. Impact Risks to waterbody and ecology. Solution The applicant will need to consider this risk and produce Bentonite Breakout Plan detailing how this will be avoided as addressed if occurs. The Non-Technical Summary states that where any features encountered along the cable route are considered sensitive then horizontal directional drilling will be applied. This includes using HDD for crossing the Thames at Swinford Bridge. Table 9.1.4 Summary of Scoping Responses of Chapter 9 states that all water course crossings will be achieved through Horizonal Directional Drilling (HDD) rather than any direct trenching. We have based our comments on this assumption, should this change then further assessment of risks to ecology will be required.	Yes	A construction method statement for watercourse crossings that will include a bentonite breakout plan is provided in the Outline Code of Construction Practice [EN010147/APP/7.6.1].

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		We support the use of HDD as a preferred method to cross waterbodies, with least risk to ecology however a significant risk of HDD is bentonite breakout within the riverbed.		
Environment Agency	Local ecology	Further clarification will be required regarding the approach to the BNG and how it will be delivered. We advise the applicant to consider opportunities in Local Nature Recovery Strategies, any mitigation measures listed for the affected waterbodies under Water Framework Directive (WFD) and contribute to the delivery of the River Basin Management Plans	Yes	We have updated the identification of any incorrect classified watercourses. This information is included in Volume 3, Appendix 10.1 Flood Risk Assessment [EN010147/APP/6.5].
Environment Agency	Local ecology	Issue Operational activities may include risks to ecology in particular protected species – otter and water vole. Impact Construction compounds, fencing and lighting within 10m of a watercourse may interrupt the movement of wildlife up and down the river corridor Solution A 10m buffer zone for all watercourses should be implemented.	Yes	All watercourses now have a minimum 8m buffer adhering to EA minimum requirements.
Environment Agency	Local ecology	Issue There is a potential need for temporary or permanent bridges or watercourse crossings for	No	No new watercourse crossings are proposed during construction. All crossings of watercourses for the purposes of cable laying will

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		access during construction or operation. Impact Watercourse crossings for access pose a risk to the river corridor habitats and species. Solution Any watercourse crossing bridge designs will need to be clear span to reduce impacts on ecology and processes within the river corridor.		be via trenchless techniques to ensure no impacts to such features.
Environment Agency	Local ecology	Issue Water vole surveys have not been undertaken Impact To protect water vole and their habitats from disturbance during construction and operation. Solution Surveys should be undertaken to identify and gain an understanding of the areas frequented by water vole. These areas may need extra mitigation to ensure no disturbance.	No	No specific survey work has been completed with respect to water vole as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.
Environment Agency	Local ecology	Issue Otter surveys have not been undertaken Impact Risk to otter from the construction and operation of this development. Solution Surveys should be undertaken to identify and	No	No specific survey work has been completed with respect to otter as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.

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		gain an understanding of the areas frequented by otter and potential holts or rest areas. These areas may need extra mitigation to ensure no disturbance. From local knowledge it is understood that otters are very active along the Evenlode.		
Environment Agency	Local ecology	Issue Fish are at potential risk from both construction and operational phases of this development and need to be included. Impact Impact is currently unknown Solution The impacts to fish from piling and the potential risks of Electro Magnetic Fields on all life stages of both migratory and non-migratory fish should be considered The Environment Agency have records of European Eel, Brown/Sea Trout, Bullhead, Lamprey (unidentified) in the location of the project. The WFD status for the Evenlode is poor for fish. We welcome measures to improve spawning habitat within the channel and encourage you to consider this as part of the enhancements and BNG opportunities.	No	No specific survey work has been completed with respect to fish as no impacts to this species' habitats are anticipated. The scope of survey work was agreed with Natural England during pre-submission consultation.
Environment Agency	Local ecology	Issue The Environment Agency have records of white clawed crayfish and fine lined pea mussel in the location of the project. Chapter 9, section 9.6.5 Species has not considered the risks to these	No	No specific survey work has been completed with respect to these species as no impacts to this species' habitats are anticipated. The scope of survey work was

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		species. Impact Impact currently unknown Solution Risks to these species need to be considered and the PEIR report updated accordingly.		agreed with Natural England during pre-submission consultation.
Environment Agency	Local ecology	Impacts of Erosion on protected species: The Evenlode is a deeply incised river in a clay catchment with associated issues of silt mobilisation and deposition. This is impacting on the fish population. Any bare earth during construction is likely to become vulnerable to erosion with further mobilisation of silt into the river.	No	Noted. As no bulk earth movement is necessary to construct the Project, it is not anticipated that significant silt will be generated. However, appropriate silt management will be incorporated into the CoCP [EN010147/APP/7.6.1].
Environment Agency	Local ecology	We support the mitigation measures listed under Table 9.1.14 (mitigation measures intended to be adopted as part of the project). However, Section 9.10.2.53 & 9.10.3.71 of Chapter 9, does not include the assessment of risks to fish, white clawed crayfish and fine lined pea mussel and we cannot agree with the conclusion that there is no change to waterbodies & their ecology.	Yes	Although not directly surveyed, the Applicant notes that all three of these features occur wholly within watercourses. Watercourses are included as a receptor in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] and, as such, the avoidance of impacts on the watercourses will also avoid impacts to these receptors. There are no physical effects to any of the water courses on the

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				Project site. This was a deliberate Project design decision. Indirect effects to watercourses from pollution etc. would be prevented through the implementation of the measures set out in the oCoCP [EN010147/APP/7.6.1] for construction and the Operational Management Plan [EN010147/APP/7.6.2] for operation.
Environment Agency	Local ecology	There are records of a number of non-native invasive species within the project location including Himalayan balsam, Japanese knotweed, New Zealand pygmyweed and signal crayfish. We understand a biosecurity plan will be included.	Yes	An Invasive Non-Native Species (INNS) Management Plan will be set out in the final Code of Construction Practice, following the principals set out in the outline CoCP [EN010147/APP/7.6.1].
Environment Agency	Local ecology	Please note that Section 9.3.1 of Chapter 9 is missing some key legislation relevant to this chapter including the Salmon & Freshwater Fisheries Act 1974, the Eel Regulations 2009 and the Water Framework Directive 2017.	Yes	Reference to this legislation added has been added to ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3].
Evenlode Catchment Partnership	Cable routes	The cabling and connection to the national grid is likely to have a major impact on the landscape and we would only be supportive of underground cable routes. All cable routes will have to take full account of archaeological remains that have not been covered by the NTS. The proposed cable routes around Swinford Bridge cut through species rich meadows that are	Yes	The only cables proposed above ground are the DC cables connecting solar panels. DC cabling between PV modules and combiner boxes within each of the installation areas will be fixed to the mounting structure underneath the arrays. DC cables will also be laid in trenches

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		part of a Thames corridor meadow restoration project and have strong local opposition. Have other routes to reach high voltage transmission lines been considered in less sensitive locations?		(unless that approach would affect areas of archaeological sensitivity, in which case they will be laid on the surface, and suitably protected). The main 33kv and 275kv connecting cables will be underground. Archaeological geophysical survey has been undertaken across some land within the cable corridor in order to assist with the option appraisal work. When the cable routes are finalised further archaeological surveys will be undertaken in order to inform final route selection and any appropriate mitigation. This approach is set out in the Outline Written Scheme of Investigation [EN010147/APP/7.6.5] The wider Alternatives Assessed are set out in Chapter 5 of the ES [EN010147/APP/6.3]
Evenlode Catchment Partnership	Local ecology	The impact on wildlife needs to be taken into consideration, for example the potential for birds like lapwing looking for water being confused by the reflective properties of the panels.	Yes	Impacts to ecology receptors including the 'lake effect' have been considered within Volume 1 [EN010147/APP/6.3] Chapter 9:

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				Ecology and Nature Conservation of the ES.
Evenlode Catchment Partnership	Local ecology	No research is available to show that plots are going to be attractive to ground nesting species such as Lapwing and in fact they are likely to be unattractive due to the potential additional predator posts from the solar farms fencing and infrastructure. Alternative mitigation such as improving the pollinator habitat for insects would provide a better outcome so a variety of early and late wildflowers and leguminous species would be more preferable.	Yes	The Applicant considers this feedback to refer to the provision of skylark plots within the Project. These are included to enhance the diversity of foraging habitat for birds as, being open areas amongst the panels, they will be botanically different to panel areas, thereby providing a different foraging opportunity. Details are provided in the oLEMP [EN010147/APP/7.6.3].
Evenlode Catchment Partnership	Local ecology	The loss of habitat for wintering birds might be one of the more significant impacts, there will be a need for undertaking habitat improvements on a wider scale at an early stage to provide a buffer for future loss.	Yes	Impacts to wintering birds are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Wintering bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.10 of the ES. The creation and enhancements of habitats for wintering birds is considered within Chapter 9.

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Evenlode Catchment Partnership	Local ecology	The north sector abuts the Glyme and Dorn valleys Conservation Target Area (CTA). CTAs are the most important areas for wildlife in Oxfordshire where targeted conservation action will have the maximum benefit. Their aim is to restore biodiversity at a landscape-scale through the maintenance, restoration and creation of BAP priority habitats. Potential impacts on the CTA will need to be fully considered and any mitigation put in place. Opportunities to extend and link habitats both within the CTA and to the surrounding landscape should be sought. The early enhancement of habitats would be encouraged. Effective long-term maintenance of new habitats will be required if mitigation is to be successful.	Yes	Impacts to CTAs are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Habitat enhancement and creation is implemented under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]. The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3]. This has been based on the aims of the Oxfordshire Nature Recovery Network which incorporates the CTAs. The Strategy includes specifications for the creation/ enhancement of habitats, a monitoring program and a scheduled review process to report on progress and propose additional management measures where they are required to meet BNG, ecology and landscape objectives.

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Evenlode Catchment Partnership	Local ecology	Connectivity of all habitats types will need to be taken into consideration throughout the proposed development. The encirclement of Pinsley, Burleigh and Bladon / Worton Heath ancient woodlands is a particular concern. Rather than a simple offset the opportunity should be taken to create a strong habitat link between these sites.	No	Additional habitat creation will be undertaken to ensure that the connectivity between the woodlands is enhanced post development. The enhancement of connectivity is a key element of the Ecology Strategy for the Project, as set out in the oLEMP [EN010147/APP/7.6.3]. This will be delivered through a combination of the River Evenlode Corridor, improved hedgerow network and increased hedgerow buffer size.
Freeland Parish Council	Local ecology	The baseline conditions set out in the PEIR show a rich diversity of habitats, with a mosaic of ancient woodland, woods, hedgerows and vales, which are regionally important. We are concerned that any Biodiversity Net Gain will be in name only, and the loss and fragmentation of habitats due to miles of deer proof fencing will severely damage the existing wildlife corridors, particularly by isolating the woodland blocks. To be effective, any mitigation would need to comprise substantial woodland screen belts and not just the odd 'meadow' or reinforced hedgerow.	No	The impacts of the Project on Important Ecological Features are fully assessed in the ES Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation, with suitable mitigation proposed to be implemented where necessary, such as additional hedgerow and tree planting, and skylark plots. The Biodiversity Net Gain Assessment is provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. It is intended that the Project will have a gain of at least 70% Habitat BNG. The Defra Statutory

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				BNG Metric has been used to demonstrate net gain. An outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3 and an Outline Code of Construction Practice in EN010147/APP/7.6.1. The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained.
Gardens Trust	Cable routes	Both cable routes are part of the local Nature Recovery Network which includes c550 people. The Network begins at Long Mead LWS which is an important ancient floodplain meadow and centre of a conservation project which has attracted national attention. Only 4 square miles of this habitat survive in the UK. The project is restoring wildflower rich floodplain meadow all along the Thames from Northmoor and into	Yes	Long Mead Meadow has been removed from within the Project site with proposed Horizontal Directional Drilling (HDD)now to the north of the Swinford Crossing in order to ensure no impacts to the LWS. HDD to be used to lay underground cables under watercourses and priority

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		Oxford. It is essential that detailed engagement with land owners and managers is carried out before decisions are taken.		habitats, including the Thames and associated floodplain meadow.
Gardens Trust	Cable routes	The fields adjoining the Thames in the southern section of northern (red) cable route have just been taken into management by the Nature Recovery Network. Work by around 50 volunteers on these fields began on 28 January 2024 and included hedge planting along the boundary identified as a cable route.	Yes	Horizontal Directional Drilling (HDD) will be used to lay underground cables under hedgerows, woodland, watercourses and priority habitats. This will include the River Thames and associated flood meadows.
Gardens Trust	Cable routes	The southern (blue) route passes through or under Long Mead and Swinford Meadow (Oxford Preservation Trust) which was also successfully enhanced using green hay from Long Mead. Section 9 of the PEIR page 25 states that at Long Mead and Swinford (farm) meadow LWS use of HDD (Horizontal Directional Drilling) means it will have no impact.	Yes	Long Mead Meadow has been removed from within the Project site with the proposed Horizontal Direction Drilling (HDD) now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.
Gardens Trust	Cable routes	Please provide details of depths and location of compounds which must be outside these meadows, as well as method statements and risk assessments to ensure that impacts on irreplaceable habitats are avoided. This should apply to any of the meadows along the Thames.	Yes	Details of HDD are provided in Project Description in the Volume 1 [EN010147/APP/6.3] Chapter 6. No works are proposed within the meadows.

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Gardens Trust	Cable routes	We are concerned that Vol 3 Appendix 9.2 Phase 1 habitat survey has so little detail and does not contain a survey of Long Mead and Swinford meadows (page 208 of section 9 Appendices 9.1 to 9.4). They are not even indicated on the habitat plans, although identified in Table 3.1 in Appendix 9.1 (desk study). Nor are they included in other surveys such as Appendix 9.9 breeding birds. There is a need for detailed surveys including the main flowering time in May/June to set the baseline; and a need for close consultation with the owners of Long Mead.	Yes	Long Mead Meadow has been removed from within the Project site with the proposed Horizontal Direction Drilling (HDD) now to the north of the Swinford Crossing in order to ensure no impacts to the LWS.
Natural England	Local ecology	Internationally Designated Sites The internationally designated sites relevant to this application are: • Cothill Fen Special Area of Conservation (SAC) • Oxford Meadows SAC The application site lies within close proximity to National Site Network sites (previously referred to as European or Natura 2000 sites), and therefore has the potential to affect their interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). The Shadow Habitats Regulations Assessment (HRA) has been included within the PEIR as Volume 3, Appendix 9.8.	Yes	The Habitat Regulations Assessment Report (HRAR) is presented in Volume 3 [EN010147/APP/6.5] Appendix 9.14.
Natural England	Local ecology	Cothill Fen SAC has been screened out of further assessment due to both the distance of the project from the site, and a lack of hydrological connectivity. The HRA has adequately considered relevant impact pathways and based	NA	The Applicant and Natural England are aligned on this point and on that basis this comment is considered to be adequately addressed.

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		on the information provided, Natural England agrees with this screening conclusion.		
Natural England	Local ecology	Please note that Natural England have not been able to access the Air Quality Assessment which is referred to as Volume 3 Appendix 4.5. It is not clear if this is available on the online document library or not.	NA	Air Quality impacts, including upon ecology receptors, are assessed within Volume 1, Chapter 19 of the ES [EN010147/APP/6.3].
Natural England	Local ecology	The 'Construction Traffic' paragraph of the HRA (4.4.10) acknowledges the need for an in-combination assessment of the traffic during construction and states that this will be presented in the Environmental Statement. Without this full in-combination assessment Natural England are not able to agree with the conclusions of the HRA. Air quality impacts should be carried through to stage 3 of the appropriate assessment.	Yes	The in-combination assessment with respect to changes in air quality has been incorporated into the assessment of effects and is reported in the HRAR (is presented in Volume 3 [EN010147/APP/6.5] Appendix 9.14).
Natural England	Local ecology	If there is potential for impacts to designated sites from pollution such as NOx, NH3, nitrogen deposition or acid deposition then this should be outlined in the next iteration of documentation. The assessment should be undertaken in line with Natural England's guidance NEA001. In the absence of access to the Air Quality Assessment we also provide the following advice: Further to the advice in NEA001, if it is determined that there are potential significant impacts from pollution associated with traffic then an assessment of ammonia impacts should also be undertaken. Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads. As traffic	Yes	The air quality assessment with respect to the project has included NOx, NH3, nitrogen deposition and acid deposition. The assessment of effects is reported in the HRAR [EN010147/APP/6.5].

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		composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road) – catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions – therefore consideration of the potential for impacts is needed (see here). There are currently two models which can be used to calculate the ammonia concentration and contribution to total N deposition from road sources. One of these models is publicly available and called CREAM, and there is another produced by National Highways.		
Natural England	Local ecology	Potential impacts through changes to water quality have been carried through to stage 3 of the appropriate assessment. Natural England agree that, subject to the identified mitigation (a Code of Construction Practice (CoCP)) being appropriately guaranteed and secured, some water quality impacts will be avoided. We advise that mitigation measures included in the CoCP should be assessed in the HRA, where relevant to internationally designated sites.	Yes	Measures to be secured in the CoCP have been included in the HRAR [EN010147/APP/6.5]
Natural England	Local ecology	However, the watercourse crossings near Swinford and Eynsham Allotments do not appear to have been considered in the HRA. Elsewhere in the PEIR this element of the project has been considered and it is made clear that Horizontal Direct Drilling (HDD) will be used. The HRA should provide further detail regarding the crossing works and provide evidence for why the use of HDD means this part of the project does not pose a likely significant effect.	Yes	HRAR [EN010147/APP/6.5] updated to consider such issues.

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Natural England	Local ecology	Furthermore, the HRA does not consider the potential impact of the use of chemical cleaning agents or other potential contaminants which may be used during the operational phase of the project. We advise that consideration should be given to any potential sources of water pollution during operation, including details of the proposed approach to panel cleaning and potential nutrient or acidity effects of any chemicals used on the designated sites.	Yes	HRAR [EN010147/APP/6.5] updated to consider such issues.
Natural England	Local ecology	Natural England welcome the suggested ecological enhancements to the 'River Evenlode corridor' and seek to input into the further design and development of this part of the scheme. There is not yet much detail on the design of these enhancements and it may be worth highlighting the hydrological connectivity to the designated sites, and the need to ensure no adverse effect on the integrity of Oxford Meadows SAC.	Yes	Further refinement of the proposed ecological enhancements of the River Evenlode corridor is anticipated to occur through the detailed design process, the framework for which will be set out within the DCO. The Applicant welcomes any further input from Natural England in developing those ecological enhancements. The Applicant will continue to engage with Natural England to identify the appropriate level of involvement.
Natural England	Local ecology	In our EIA Scoping response (26 June 2023, ref: 438578, EN010147) we highlighted that 'the proposal could have potential impacts on Blenheim Park SSSI, Rushy Meadows SSSI, Wytham Ditches & Flushes SSSI and Wytham Woods SSSI. There are a number of potential impact pathways to consider at these sites during the construction and operational phases of the	Yes	The assessment of effects reported in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] has separated out the SSSIs to ensure what is scoped in/out is clear.

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		development which will require further assessment'.		
Natural England	Local ecology	This comment has been highlighted in Table 9.1.4. Table 9.1.1 (regarding the NPS requirements) contains a section which states that 'the approach taken to assess the impacts and effects of the Project on SSSIs is the same as for international sites'. Section 9.10 'Assessment of effects' uses the EIA framework to assess potential impacts to SSSIs and this is not the same approach taken for internationally important sites.	Yes	ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3] has been updated to clarify the approach to this issue.
Natural England	Local ecology	Natural England advise that further depth should be given to the impact assessment for SSSIs. The Assessment of effects should highlight which nearby SSSIs are being considered, their interest features, potential impact pathways and any mitigation measures where appropriate. Presently, it is not clear which SSSIs have been scoped into the assessment or the reasons for any sites within the Zone of Influence of the project being scoped out.	Yes	HRAR [EN010147/APP/6.5] updated to consider such issues.
Natural England	Local ecology	In our EIA Scoping response, we noted the proximity of the red line boundary to Wytham Woods SSSI and highlighted the potential for direct loss of the designated site. We note that the PEIR has been updated to confirm that the Project poses no direct loss to any designated sites.	No	The Applicant notes this comment. Impacts to Wytham Woods SSSI are considered in Section 9 of ES Chapter 9 Ecology and Nature Conservation **[EN010147/APP/6.3].**

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Natural England	Local ecology	Natural England has not been able to fully review the protected species information provided in the PEIR in detail. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures.	No	The Applicant notes this comment. As set out in ES Chapter 9 Ecology and Nature Conservation **[EN010147/APP/6.3]** and associated appendices **[EN010147/APP/6.5],** surveys were undertaken according to good practice guidelines, in line with Natural England standing advice.
Natural England	Local ecology	A separate protected species licence from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England can then review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.	No	The Applicant notes this comment. . Draft licences will be produced and sent to Natural England to ensure that LONIs are issued in advance of the close of Examination.

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Natural England	Local ecology	The bat surveys have highlighted the presence of numerous rare species. Natural England understand that the project team are currently preparing a document which will provide more information on the local bat populations and the ecological function of the local environment. It should be noted that there have been recent studies (Tinsley et al. 2023, Barré et al. 2023) which highlight the potential impacts that solar installations can have on bats. Natural England encourage the project team to consider this latest evidence and we hope to provide further input on this element of the scheme and on potential mitigation measures. The PEIR discusses the need for buffering relevant ecological features and Natural England hope that a positive management scheme for the field buffers and grassland can be implemented which would increase the prey availability for bat species.	Yes	The research noted and the consequences of it have been considered extensively during pre-submission discussions with Natural England. Surveys with respect to bats are reported in ES Appendix 9.4 Bat Survey Report [EN010147/APP/6.5]. The potential impacts of the Project on bats is considered in ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3].
Natural England	Local ecology	Negative impacts resulting from habitat severance and connectivity have been scoped out of the assessment (Table 9.1.7) because the Project will retain woodland, hedgerows and watercourses. The latest research highlights that there is a possibility the connectivity of the landscape might be impacted by the Project even with this planned retention of ecological features.	Yes	Negative impacts resulting from habitat severance and connectivity have been scoped back into the assessment.
Natural England	Local ecology	Natural England welcome the planned inclusion of a construction lighting plan (9.10.3.144) but advise there is uncertainty with regards to the conclusion of the assessment of impacts to bats (9.10.3.144) because of the issues we have raised in Section 3.1.	Yes	The Applicant notes this comment. The uncertainty with respect to the impacts of the Project on bats is reflected through the commitment to include appropriate buffers along

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				important bat commuting routes to ensure that such routes are not compromised.
Natural England	Local ecology	The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or another local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local Nature Recovery Strategies (LNRS) may also provide further useful information and the PEIR makes reference to this influencing the design.	Yes	Information with respect to local wildlife sites is set out in ES Appendix 9.1 Desk Study [EN010147/APP/6.5] with information obtained from the Local Records Centre. The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3]. This draws on the Oxfordshire Nature Recovery Network, in particular with the focus on the River Evenlode corridor.
Natural England	Local ecology	Priority habitats and species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.	No	The Applicant notes this comment. Priority habitats and species are considered in ES Chapter 9 Ecology and Nature Conservation **[EN010147/APP/6.3].**

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Natural England	Local ecology	Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.	No	The Applicant notes this comment. Data relating to habitats, species and designated sites has been gathered from appropriate resources and is presented in ES Appendix 9.1 Desk Study **[EN010147/APP/6.5].**
Natural England	Local ecology	The importance of the local area for wintering and farmland bird species is noted. Please note that we have not been able to review the wintering or breeding bird surveys of Volume 3 Appendix 9.4/9.9 of the PEIR. We hope to review this and provide further comments as the DCO application progresses.	Yes	Impacts to wintering and breeding birds are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Breeding bird and wintering bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.9 and 9.10 of the ES.
Natural England	Local ecology	Natural England highlight our research reports TIN101 and NEER012, which provide a useful review of the potential impacts of solar installations on birds. We would encourage the PEIR to consider these papers and address relevant topics.	No	The Applicant notes this comment. Both TIN101 and NEER012 have been drawn upon in the completion of ES Chapter 9 Ecology and Nature Conservation **[EN010147/APP/6.3].**
Natural England	Local ecology	Natural England welcome the Project's aim to deliver a minimum of 70% biodiversity net gain. We recommend that the target increase in BNG of 70% across all biodiversity unit types is secured by a suitably worded requirement in the DCO.	No	BNG commitments will be secured via the oLEMP which, in turn, is secured via an appropriate DCO requirement.

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Natural England	Local ecology	We hope to input into the design of the BNG elements of the scheme to deliver the best environmental outcomes. We recommend that developers use the latest version of the Defra biodiversity metric to calculate BNG (currently version 4.0) and adhere to the rules and principles set out within the metric guidance. We understand that the project team are currently struggling to implement the metric due to the scale of the data inputs required and we aim to work with them to resolve this issue.	No	It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. **[EN010147/APP/6.5]** The Defra Statutory BNG Metric has been used to demonstrate net gain. The proposals are also supported by an Outline Landscape and Ecology Management Plan **[EN010147/APP/7.6.3].** The Outline Landscape and Ecology Management Plan **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.
Natural England	Local ecology	Further best practice principles can be found: • BS 8683:2021 Process for designing and implementing Biodiversity Net Gain • CIEEM/IEMA/CIRIA good practice principles (2016) and guidance (2019).	No	The Applicant notes this comment. The best practice principles have been drawn upon through the completion of ES Appendix 9.13 Biodiversity Net Gain Statement **[EN010147/APP/6.5]**
Natural England	Local ecology	Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact. They should also deliver strategically	Yes	The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3].

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		important outcomes for nature conservation. We recommend that opportunities should be sought to link delivery to relevant plans or strategies. This could include Green Infrastructure Strategies or Local Nature Recovery Strategies.		This draws on the Oxfordshire Nature Recovery Network, in particular with the focus on the River Evenlode corridor.
Natural England	Local ecology	Natural England welcomes the commitment to habitat creation and enhancement, including the establishing of grassland under the solar panels. The PEIR refers to an oLEMP which is not yet available for review. There are potential opportunities for best practice grassland management under the panels and we hope to input into the design, establishment and monitoring program of the grassland.	Yes	The outline Landscape and Ecology Management Plan is presented in [EN010147/APP/7.6.3].
Natural England	Local ecology	Aftercare of any sown sward is vital, and management will be required to ensure the establishment of the grassland. We would expect details of management requirements, such as grass cutting and collection or grazing, to be set out in the oLEMP.	Yes	Management requirements relating to landscape and ecology are indeed presented within the oLEMP, including draft maintenance schedules and planting palettes. [EN010147/APP/7.6.3.] The Outline Operational Management Plan [EN010147/APP/7.6.2] details operational mitigation measures, and sets out the monitoring activities designed to demonstrate that such mitigation measures are carried out, and to measure their effectiveness.

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Natural England	Local ecology	Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account when determining relevant decisions. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.	NA	The Applicant notes this comment. Natural England and the Forestry Commission guidance has been taken into account in the determination of the protection measures necessary for both ancient woodland and veteran trees; 15m buffer minimum for the former and 15 times the DBH, uncapped for the latter.
Natural England	Local ecology	We would encourage the Project to look more at the ambitions of the LNRS and to identify potential opportunities for enhancing and connecting the woodland parcels in the landscape.	Yes	The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3]. This draws on the Oxfordshire Nature Recovery Network, in particular with the focus on the River Evenlode corridor and how this can be used to enhance connectivity between the various woodland parcels that surround the Project site, around the Blenheim Estate in particular and to the River Thames and Wytham Woods to the south.
Oxfordshire Local Nature Partnership	Local ecology	As with our first response over 12 months ago, this response reflects the lack of ecological detail provided. More clarity is still required prior to fully assessing the impacts on nature.	Yes	Impacts to wildlife are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation of the ES.

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Oxfordshire Local Nature Partnership	Local ecology	OLNP is clear that most of the concerns raised in our response to your first consultation have not been addressed. If Photovolt Development Partnership (PVDP) wish to garner the thoughts of the environmental community of Oxfordshire on the ecological impacts of the development, more information needs to be provided. This consultation cannot achieve its aims without publication of the full Environmental Impact Assessment.	Yes	The Applicant notes this comment. The Applicant has undertaken a series of defined phases of consultation during the pre-application period, to allow for iterative involvement, engagement and feedback throughout the development of proposals. This included a non-statutory phase one consultation on early-stage proposals, held for seven weeks between 03 November 2022 and 22 December 2022. The Applicant's strategy of undertaking an iterative consultation process has allowed for feedback to inform the development of the Project in a timely manner, including reporting back to consultees at an interim stage. The Applicant has actively sought and taken due regard to feedback provided by stakeholders on its approach to community consultation and has made

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				changes where possible as documented in the Consultation Report. Consultation responses to each stage of consultation have been carefully documented and considered as part of the iterative development of the Project, with stakeholders playing a key role in the design of the proposals
Oxfordshire Local Nature Partnership	Local ecology	What is the true nature-value of the land currently? The BWSF non-technical summary states, following 'a series of site specific surveys' and 'desk based study' that 'the fields were found to be of little ecological value'. It is assumed that the 70% BNG claim is based upon this. We would like to see clearer evidence of the baseline condition of the land, including including full UK Habs ecological survey. PVDP should also work closely with the tenants, landowners and other land managers and local ecologists to develop a comprehensive understanding of the current ecological state of the land. Agricultural land can be biodiverse, supporting numerous species of flora and fauna. This recommendation from our first consultation response has not, insofar as we can tell from the PEIR or its Appendices, been acted upon. Therefore, all claims that the land is currently low ecological value agricultural land seem unfounded. Furthermore, Appendix 9.2 (cursory 2021 Phase 1 habitat survey of small	Yes	It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] Appendix 9.13. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3.

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		portions of the site) does not appear to be available.		
Oxfordshire Local Nature Partnership	Local ecology	How can PVDP reassure stakeholders that pre-planning degradation has not and will not occur? Pre-planning degradation is where developers deliberately reduce the biodiversity value of the land prior to gaining planning permission. Having a lower biodiversity baseline makes it easier to claim greater biodiversity uplift, and therefore higher 'net gain' figures. OLNP seeks reassurance that this will not happen. One way to do so is to share full ecological habitat assessments of the land, conducted at the earliest available point. This links closely to 1.1.	Yes	Habitat extent and condition is assessed within the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. It is based on the surveys completed as part of the pre-application stage and reflects the current intensive agricultural land use of the Project site.
Oxfordshire Local Nature Partnership	Local ecology	How will BWSF ensure that proposed gains are delivered in practice? Claims of delivering a net gain in biodiversity of 70% are to be welcomed, albeit cautiously. Evidence should be provided that satisfies ecologists not just that the pre- and post- habitat conditions entered into the DEFRA metric result in the gains claimed, but that the post-development habitat type and condition are realistic and achievable.	Yes	BNG habitat creation and enhancement was formulated in conjunction with project ecologists and landscape specialists, to ensure habitat are achievable and realistic. BNG plans are implemented under the outline Landscape and

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				Ecology Management Plan [EN010147/APP/7.6.3]. The oLEMP includes specifications of the creation/ enhancement of habitats, a monitoring program and a scheduled review process to report on progress and propose additional management measures where they are required to meet BNG, ecology and landscape objectives.
Oxfordshire Local Nature Partnership	Local ecology	Can the precautionary principle be applied across ecological decision making? The application of the precautionary principle manages risk where there is a lack of scientific certainty of the seriousness and likelihood of plausible environmental damage. There is a gap in evidence, even contradictory evidence, around the potential for large solar arrays to contribute to biodiversity. Given the unprecedented scale of the development, it is impossible to fully assess its cumulative impacts. Furthermore, there is inadequate evidence around some of the specific aspects, such as the success of skylark plots in a development of this size. Thus, all mitigations for issues highlighted should go above and beyond the statutory minimum.	No	The assessment has been based on the best available evidence with respect to both the negative and positive effect of solar sites on ecology receptors. This includes the application of the precautionary principle where necessary (in the assessment of effects on bats, for example). The provision of skylark plots is specifically to ensure a diversity of habitat available for this and other species to use for foraging during the breeding season to support the creation of nests both on and off site. The Ecology Strategy for the Project is set out in the oLEMP [EN010147/APP/7.6.3]. This describes the landscape-scale

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				enhancements that are proposed, commensurate with the scale of the solar farm. The key element of this is the River Evenlode Corridor that provides landscape-scale benefits for ecology.
Oxfordshire Local Nature Partnership	Local ecology	Can PVDP commit to using no herbicides of pesticides across the whole site? There are ways of managing nature, including plants and insects, that are less damaging to the environment. Indeed some, such as sheep, have positive benefits to society (and potentially nature). Therefore, OLNP requests PVDP's application commits the landowner or land manager to natural, holistic approaches to pest management and 'weed' control.	Yes	Outline details of the management of the landscape, including meadows, are set out in the oLEMP [EN010147/APP/7.6.3] and will be further advanced in detailed Landscape Management Plans, including the integration of conservation grazing, submitted to the LPA for approval under Requirements prior to construction.
Oxfordshire Local Nature Partnership	Local ecology	Can PVDP commit to a long-term partnership with academic institutions to ensure Botley West contributes significantly to the body of knowledge on solar parks and biodiversity? OLNP understand there are hopes to do so. It is vital that these plans are carried through, to ensure the impacts of BWSF in reality are captured, analysed and communicated to the sector as a whole.	No	The Applicant has had discussions with Oxford University's WildCRU to establish a study of the solar farm in operation. PVDP would like such a study to take place.

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Oxfordshire Local Nature Partnership	Local ecology	Can BWSF commit to managing the main mitigation areas for nature in perpetuity? One way to achieve this would be to transform them into a nature reserve (with managed public access to some areas) that could achieve Local Wildlife Site status and potentially ultimately become a Site of Special Scientific Interest (SSSI). This would create one of the largest and most wildlife-rich nature reserves in Oxfordshire.	Yes	As set out in the oLEMP [EN010147/APP/7.6.3], it is anticipated that the management of the Evenlode Corridor will allow it to achieve LWS status in time.
Oxfordshire Local Nature Partnership	Local ecology	Can the buffer around ancient woodland be extended from 15m to 50m? Woodland Trust research (ref) shows that the root network of ancient woodlands can extend to 50m. Animals also benefit from this transitional habitat area. PVDP need to provide evidence that shows a 15m buffer is sufficient to ensure no negative impact on the ancient woodland. If it can't, the buffer should be extended to 50m.	No	The 15m buffer to Ancient Woodland is that recommended by Natural England and, as such, has been adopted as the minimum requirement.
Oxfordshire Local Nature Partnership	Local ecology	Can PVDP ensure that its final ecological design maximises the provision of nature corridors between portions of existing high-quality habitat (such as ancient woodland)? Doing so would maximise the benefits of any new habitat creation for biodiversity.	Yes	As set out in the oLEMP [EN010147/APP/7.6.3], the Ecology Strategy for the Project has been driven by the aims of the Oxfordshire Nature Recovery Network, in particular with respect to the Evenlode Corridor and how such a corridor could function as a landscape-scale enhancement linking the Blenheim Estate and associated ancient woodland to the north and the River Thames, associated meadows and Wytham Woods to the south.

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Oxfordshire Local Nature Partnership	Local ecology	What is the proposed habitat management of the sites in which panels are places? It is anticipated that the majority of the 70% BNG is delivered in the areas without panels. What is PVDP going to do to ensure that the area that has panels on it is as nature-rich as possible? The provision of bee-hives, log piles, bird boxes and bat boxes is fine, but nature needs to thrive across the landscape, and such man-made contributions will only achieve so much. OLNP is pleased that PVDP has not made overreaching claims regarding establishing lowland meadow under panels but hopes that every effort will be made to encourage grassland of the highest possible biodiversity value, such Other Neutral Grassland' by pursuing a wildlife rich species mix with conservation grazing across the whole panelled area. Overall, OLNP support a principle of multifunctionality in a landscape, rather than one space for nature, one space for development.	Yes	Habitats are managed under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]. Panelled areas of grassland will be multi purpose, providing biodiversity improvements, conservation grazing areas and be used operationally by the solar farm.
Oxfordshire Local Nature Partnership	Local ecology	Will BWSF utilise Natural England's Environmental Benefits from Nature tool (EBN) to calculate the extent to which the scheme is likely to deliver wider environmental net gain? The tool is a natural progression on from the DEFRA metric and allows calculation of changes to environmental benefit provision from habitat change. It is key to ensure that proposed changes to habitat as entered into the tool are realistic and achievable.	No	The EBN has not been used to date and has not been mentioned by Natural England during pre-submission consultation.
Oxfordshire Local Nature Partnership	Local ecology	Will BWSF consider utilising Alison Smith's ecosystem service opportunity mapping to guide	No	Alison Smith's Ecosystem Service Opportunity tool has not been used. However, the opportunities

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		site design in a way that maximises provision of environmental benefits?		for the delivery of environmental benefits have been considered throughout the design of the Project, for example, the provision of flood prevention measures near to Cassington.
Oxfordshire Local Nature Partnership	Local ecology	What precautions will be taken to ensure that any impact on biodiverse habitats and their provision of environmental benefits, especially water meadows at the side of the Thames, is positive not negative?	Yes	Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and priority habitats, including the Thames and associated floodplain meadow. Long Mead Meadow has been removed from within the Project site with the proposed HDD now to the north of the Swinford Crossing in order to ensure no impacts to the LWS. Impacts are assessed and mitigation outlined in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. A range of ecology surveys (including breeding and wintering bird surveys) have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES. A number of management plans have been prepared in order to

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				limit any negative impacts to the environment [EN010147/APP/7.6].
Oxfordshire Local Nature Partnership	Local ecology	How will BWSF impact local people's access to nature? OLNP suggests that in order to accurately analyse this, a baseline is required that enables understanding of the current access and recreational use of the sites, and surrounding areas. This could take the form of surveys such as those used to assess zones of influence from Habitat Regulations Assessments (HRAs). Following a baseline assessment, the ORVal tool can be used to calculate the value of this access, and a post-development plan can also be run through the tool, to analyse changes to this. Only by doing this can we fully understand the impacts, and design appropriate solutions to mitigate and minimise these.		Consideration of people's access to nature, in terms of their experience and enjoyment of the countryside, is assessed in Chapter 16 Human Health, and in the Socio Economic Chapter 15, including effects on tourism and visitors. [EN010147/APP/6.3] Footpath user surveys were also conducted in the summer 2024, and are reported on in the ES in these Chapters and Chapter 17 on the use of Public Rights of Way.
Oxfordshire Local Nature Partnership	Local ecology	Can PVDP commit to using low stock fencing (if necessary) instead of security fencing across the whole of the site? This would make a significant difference to people's interaction with nature whilst visiting the area, as well as potentially making it easier for certain species to travel across the land. A 2.1m high fence has severe implications for both wildlife connectivity and for people's experience of the countryside. If there is to be no conservation grazing, OLNP questions the need for any fence at all.	No	The solar arrays need to be generally secure from intruders, and stock proof, which is why deer fencing is proposed. The deer fencing will be large gauge wire, mounted on timber posts – so intervisibility will not be greatly reduced. Rather it is the proposed use of hedgerows and additional hedge and tree planting that is being used to filter views of the Project.

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				All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. The deer fencing is necessary to ensure no damage to the solar arrays from large herbivores.
Oxfordshire Local Nature Partnership	Local ecology	OLNP has serious concerns about the nature-related impacts of Botley West Solar Farm and feels there is insufficient information provided so far to adequately analyse the benefits, disbenefits and mitigations of the scheme. Answering the questions above would go a long way towards ensuring decisions are taken based on evidence, the precautionary principle is applied where evidence remains lacking, and outcomes for nature and nature-connectedness can be optimised and maximised across the site and beyond.	No	The Applicant notes this comment.
Shipton-on-Cherwell and Thrupp Parish Council	Local ecology	We welcome the proposed 70% net biodiversity gain (BNG) but, without detailed measures and monitoring, we remain concerned about how will be achieved. The University of Oxford has a world-leading research group (see reference below) focused on BNG and we strongly advise inviting them to participate in the design and monitoring of the BNG actions to be undertaken. Ref: Rampling, E. E., Ermgassen, S. O. S. E. zu, Hawkins, I. & Bull, J. W. (2023) Achieving biodiversity net gain by addressing governance	Yes	Full details of the proposed 70% gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain. The proposals are also supported by an Outline Landscape and

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
		gaps underpinning ecological compensation policies. Conserv. Biol. (2023) doi:10.1111/cobi.14198.		Ecology Management Plan [EN010147/APP/7.6.3]. The Outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving, habitats during the operation of the Project.
Witney Town Council	Local ecology	Witney Town Council acknowledge the estimated 70% gain in biodiversity through mitigation. However, members express concerns about the longer-term future of the development sites. Assurances and guarantees are sought that when the scheme has reached the end of its lifecycle, the sites and development areas are protected from automatically being deemed brownfield sites. The developer has a duty to return the land to greenfield sites, or that the sites continue to provide renewable energy.	Yes	The application is supported by an outline Operational Management Plan [EN010147/APP/7.6.2], and outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] and an outline Decommissioning Plan [EN010147/APP/7.6.4].
Wootton (Woodstock) Parish Council	Local ecology	An improved flora and fauna and biodiversity survey with plans for improvement clearly specified in detail. We are aware that the Landscape and Ecology Management plan is still not completed and we require that the public and councils should be able to comment on it when it is complete. The plan must include the following improvements. The Biodiversity net gain target of 85% to be achieved across all sites: This target should be made a legal requirement. This should not be an average of all sites, but at each individual site. Currently the stated target is 70%	Yes	The outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3. It is intended that the Project will have a gain of at least 70% Habitat BNG.

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		but this is unacceptable because it be achieved with very little effort and does not constitute sufficient benefit or improvement. Appendix A lays out in more detail particular clauses with need to be addressed and resubmitted for consultation.		Full details of the gain are set out in Appendix 9.13. [EN010147/APP/6.5] The Defra Statutory BNG Metric has been used to demonstrate net gain.
Wootton (Woodstock) Parish Council	Local ecology	A number of studies have been concluded but a genuine baseline cannot be established with out-of-date data. All species of Flora and Fauna must be studied and data collected accordingly. Studies should not be limited to just protected species or species of conservation interest. A full and comprehensive baseline is required to establish BNG.	Yes	The scope of survey work was agreed with Natural England during pre-submission consultation. Impacts to wildlife are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. A range of ecology surveys (including breeding and wintering bird surveys) have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.1-9.14 of the ES. All data is current at the time of submission of the ES, pre-commencement surveys will be undertaken to update any out of date data. BNG for the Project is based on the Biodiversity Net Gain Assessment provided in Volume 3 [EN010147/APP/6.5] Appendix 9.13. BNG is implemented and managed under the outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3.

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
Wootton (Woodstock) Parish Council	Local ecology	Habitat Regulations Assessment to be compulsory 6 months prior to any works commencing. Minimum 20m Buffer Zones: This to include but not limited to Housing, Footpaths, Hedgerows, Watercourse, Ponds, Woodlands etc.	Yes	The Habitat Regulations Assessment Report is provided in Volume 3 [EN010147/APP/6.5] Appendix 9.14. Minimum buffers zone to interest features are provided in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation.
Wootton (Woodstock) Parish Council	Local ecology	Surveys of Flora, Fauna and Habitats: Every species of Flora and Fauna must be studied. Deer and foxes to be included. It should not be limited to just protected species or species of conservational interest. Studies must be conducted continuously up until any works commence. Studies should then be conducted annually which will contribute towards ongoing management strategies to achieve min 85% BNG. Clause by clause comments on Chapter 9 of the PEIR on Ecology and Nature Conservation 9.1 – no removal of any Hedges / Trees / Woodlands 9.2 - 20m buffers 9.4 - 20m buffers 9.8 - Deliver at least 85% BNG 9.12 - 85% BNG	Yes	The scope of survey work and BNG for the Project was agreed with Natural England during pre-submission consultation. The scope of survey work was agreed with Natural England during pre-submission consultation. Deer and foxes are not of conservation concern. As deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing. All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. Pre-commencement surveys will be undertaken to update any out-of-date data. BNG plans are implemented under the outline Landscape and Ecology

Respondent	Theme	Comment	Has this been addressed by a change to the Project or the Applicant's evidence?	Applicant response
				Management Plan [EN010147/APP/7.6.3]. The oLEMP includes specifications of the creation/ enhancement of habitats, a monitoring program and a scheduled review process to report on progress and propose additional management measures where they are required to meet BNG, ecology and landscape objectives.
Wootton (Woodstock) Parish Council	Local ecology	The following should be implemented across all areas of sites: - bee hives - log piles and other refugia - bird boxes on retained trees - bat boxes on retained trees	Yes	All species-specific enhancements mentioned are incorporated into the masterplan and implemented under the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3].
Wootton (Woodstock) Parish Council	Local ecology	9.16 - Fencing must not eliminate the badgers or *any* other animal's ability to 'forage or roam.' Other methods must be sought to prevent harm to wildlife. 9.18 - Herras fencing is too high	Yes	All deer fencing will be designed to be permeable to smaller mammals such as badger and fox to ensure permeability of the Project site for these species will be retained. As deer are wide-ranging in their habits and movements, it is not considered that changes in deer movements brought about by perimeter fencing.

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Wootton (Woodstock) Parish Council	Local ecology	9.10.2.1 Planting within the panel arrays to be sown with appropriate wildflower mixes suitable for the land. Advice on planting and grazing plans to be sought from relevant experts / organisations. This must be carried out across all sites and planting/ grazing plans and strategies must be carried on for the whole period the solar farm is in use. At the end of the period; 35 or 42 yrs whichever is first (but before decommissioning) Wildflower areas must be studied and records taken. Appropriate measures for protection of important areas must be sought.	No	Grassland habitats will be created within panel arrays (this approach has been welcomed by Natural England). The development of the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3] was sought from experts in the field. Monitoring programs in accordance with the oLEMP will be undertaken for a 30-year period. The protection of important areas is outlined in the mitigation of the Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation and management plans prepared for the project [EN010147/APP/7.6].
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.73 - Any vegetation removal must be carried out outside of any breeding season. No exceptions.	Yes	The following best practice measure has been implemented to protect nesting birds during works: Suitable habitat for breeding birds will be cleared between October and mid-February, outside the breeding bird season, as far as practicable. Where this is not feasible the vegetation, building or structure due to be removed would first be inspected by a suitably qualified ecologist. Any active nests would be retained along with a minimum 5 metre buffer around them.

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Wootton (Woodstock) Parish Council	Local ecology	9.10.2.95 - Badger activity to be continuously monitored, any set locations noted that are in use or not in use should be assessed every 3 months.	Yes	Pre-commencement surveys will be undertaken for badger. The badger protected species mitigation licence will guide further mitigation for badgers.
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.121 - Specific surveys for dormouse/hazel mouse MUST be undertaken and continuously assessed every season.	Yes	As some areas of hedgerow are proposed to be impacted by the project, dormouse surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES. The lifespan of this data is considered to be 2-years, pre-commencement surveys will be undertaken where required. The survey/monitoring requirements of the Dormouse European Protected Species Mitigation Licence will adhered to.
Wootton (Woodstock) Parish Council	Local ecology	9.10.2.129 - Specific surveys for Otters MUST be undertaken due to the likelihood to use areas of the sites for commuting and foraging.	No	Given that all water courses will be protected with appropriate buffers during both construction and operation of the Project, no specific surveys for these species have been undertaken. Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and a buffer distance of a minimum of 10m will be observed surrounding watercourses. Considering this negligible impacts are likely to

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				otter. The scope of survey work was agreed with Natural England during pre-submission consultation.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.139 - Specific surveys MUST_be carried out.	Yes	Badger surveys will be undertaken prior to decommissioning.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.37 - 20m buffers	No	Ancient woodland will have a minimum 15m buffer, as per Natural England guidelines.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.73 - 20m buffers	No	Ponds will have a minimum 5 metre buffer. Watercourses will have a minimum 8 metre buffer. These distances of buffer is considered minimum distance sufficient to ensure impacts to such features are avoided.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.85 - Emphasises the need to carry out studies for Dormice.	Yes	As some areas of hedgerow are proposed to be impacted by the project, dormouse surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.131 - 20m buffers to be implemented. No set closures. Continuous monitoring of all sets occupied or unoccupied.	No	All badger setts will be retained, where possible, with an appropriate buffer of undisturbed habitat. Retention will be incorporated in the final Project design following pre-commencement surveys.

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Wootton (Woodstock) Parish Council	Local ecology	9.10.3.143 - Sensitivity of the receptor to be changed to HIGH due to the conservation importance level and low ability to recover.	Yes	Bat sensitivity changed to High to account for increased value of bat population identified on site since the PEIR.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.167 - Specific surveys MUST be undertaken.	Yes	As some areas of hedgerow are proposed to be impacted by the project, dormouse surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.169 - Features to be identified and mapped. Species survey MUST be undertaken.	Yes	Dormouse surveys undertaken and features mapped presented in Volume 3 [EN010147/APP/6.5] Appendix 9.11 of the ES.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.180 - Specific surveys MUST be undertaken.	No	Given that all water courses will be protected with appropriate buffers during both construction and operation of the Project, no specific surveys for these species have been undertaken. Horizontal Directional Drilling (HDD) will be used to lay underground cables under watercourses and a buffer distance of a minimum of 10m will be observed surrounding watercourses. Considering this negligible impacts are likely to otter. The scope of survey work was agreed with Natural England

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				during pre-submission consultation.
Wootton (Woodstock) Parish Council	Local ecology	9.10.3.195 - Specific surveys MUST be undertaken.	Yes	There have been incidental sightings of hare and hedgehog around the Project site during other surveys. Both species are therefore considered as receptors within ES Chapter 9 Ecology and Nature Conservation [EN010147/APP/6.3]
Wootton (Woodstock) Parish Council	Local ecology	9.10.8.2 - Target gain of 85 % BNG to be a LEGAL requirement.	Yes	The approach to BNG is set out in ES Appendix 9.13 Biodiversity Net Gain Statement [EN010147/APP/6.5]
Wootton (Woodstock) Parish Council	Local ecology	9.10.8.3 - Wildflower meadows to be planted and managed in all solar panel array areas. Grazing plans to be implemented in accordance with expert advice. No mechanical cutting. No removal of cuttings.	Yes	The approach to site management is set out in the oLEMP [EN010147/APP/7.6.3]

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Wootton (Woodstock) Parish Council	Local ecology	Buffers to be minimum 20m. Planting/Management strategies to be implemented.	No	All hedgerows will have minimum of 5m buffer. This distance of buffer is considered the minimum distance sufficient to ensure impacts to such features are avoided.
Wootton (Woodstock) Parish Council	Local ecology	New woodland planting to increase to 10ha	No	5 ha of new woodland is proposed to be created.
Wootton (Woodstock) Parish Council	Local ecology	New hedgerow planting to increase to 40km. Current hedgerows within site to be	No	The Project includes the provision of 26.5 km of new species rich

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		reinforced/gapped-up with relevant species. All hedgerows to be 3m in width.		hedgerow that will increase the habitat available. Hedgerows and trees will be incorporated to either side of PRoW routes (trees to one side only in some places to avoid shadowing of panels). Details of typical sections of footpath and cycle path routes, with hedgerow planting, are illustrated in Figure 7.6.3.2 [EN010147/APP/7.6.3] In addition a length of some 22km of existing hedgerow will be reinforced/gapped up.
Wootton (Woodstock) Parish Council	Local ecology	9.10.9 - Future monitoring. This should take place across all sites. All species of Flora and Fauna should be studied. This should be done annually throughout the life of the solar farm. All results to be published.	Yes	The monitoring program is outlined in the outline Landscape and Ecology Management Plan [EN010147/APP/7.6.3]. Representative areas of the Project site will be included in the monitoring program. Monitoring reports will be produced following monitoring events.
Wootton (Woodstock) Parish Council	Local ecology	Decommissioning - Current mitigation plans for the decommission of the site are, at this stage, to only be considered as 'recommended steps'. With a BNG of 85% to be achieved this will greatly impact the way in which all areas of site would be decommissioned. Many ecological and environmental changes can occur in 35/42 years and as such, full studies across all sites should	Yes	Completion of pre-decommissioning ecology surveys will be undertaken, as necessary, to ensure an up to date baseline with respect to the location and distribution of relevant protected species. This will inform any necessary

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		be carried out to assess the impact decommissioning could impact the BNG achieved. Sensitivity of receptors at decommissioning stage cannot currently be estimated. With an 85% BNG to be achieved this will greatly increase the sensitivity of receptors across the entire project. Full studies must be carried out no earlier than 1yr prior to decommissioning to assess the ecological impact it will have to all sites.		applications for protected species licences and any method statements which are required to be complied with during the decommissioning phase.
Worton Farms	Local ecology	The estate is home to a number of protected species especially rare aquatic birds. We worry what sort of impact a large scale solar farm may have on the birds, particularly their migration? We would ask that your findings from any wildlife surveys to be made public so we, and others can understand how the wildlife will be affected.	Yes	Impacts to wintering and breeding birds are assessed in Volume 1 [EN010147/APP/6.3] Chapter 9: Ecology and Nature Conservation. Breeding bird and wintering bird surveys have been undertaken and are presented in Volume 3 [EN010147/APP/6.5] Appendix 9.9 and 9.10 of the ES.