



Botley West Solar Farm

Change Request Report

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Glossary

Term	Meaning
The Applicant	SolarFive Ltd
The Project	The Botley West Solar Farm
The Site or Order Limits	The area of land encompassing the Project development and shown on the Location Plan [AS-024]).

1 Introduction

1.1 The Project

- 1.1.1 Photovolt Development Partners (PVDP), on behalf of SolarFive Ltd (the Applicant), submitted its application for a Development Consent Order (DCO) for the Botley West Solar Project (the “Project”) on 15 November 2024 (the “DCO Application”). The DCO Application was accepted for examination by the Planning Inspectorate on 13 December 2024.
- 1.1.2 Botley West is a solar farm located in parts of the administrative areas of West Oxfordshire District Council (WODC), Cherwell District Council (CDC) and Vale of White Horse District Council (VWHDC) and is within the county of Oxfordshire. Its renewable electricity generation output will be critical in helping deliver the Government’s commitments.
- 1.1.3 The Project has a total area of approximately 1,418 ha (see Location Plan [AS-024]), with the installation of solar panels across approximately 839 ha. The site location and size emerged following a site search undertaken by the Applicant, itself influenced by a number of planning, environmental, commercial and engineering factors. These factors are set out in Chapter 5: Alternatives considered of the Environmental Statement [APP-042].
- 1.1.4 For ease of description, the Applicant has broadly divided the Project into three main sites, linked together by common electrical infrastructure, including electrical cabling: the Northern Site Area, the Central Site Area and the Southern Site Area (see Figure 1.2 [AS-019]). The Project will be connected to a new National Grid Sub-station located at the southern end of the Project site, providing secure and clean energy of an equivalent level to meet the needs of approximately 330,000 homes.
- 1.1.5 The Project extends from an area of land in the north, situated between the A4260 and the Dorn River Valley near Tackley and Wootton (Northern Site Area), through a central section, situated broadly between Bladon and Cassington (Central Site Area), and connecting to a section further south near to Farmoor Reservoir and north of Cumnor (Southern Site Area), where the Project will connect to the National Grid transmission network (the Site Areas, as shown in Figure 1.2 [AS-019]). The majority of the land proposed for the Project is currently used for arable crops, the majority of which is grown as livestock feed, or is otherwise down to pasture.
- 1.1.6 The Applicant’s Project is a Nationally Significant Infrastructure Project (NSIP) as the anticipated generation capacity of Botley West exceeds 50 MWe. The Applicant therefore seeks development consent, under the Planning Act 2008 (PA 2008), to construct, operate and maintain, and decommission a solar farm and associated infrastructure. The consent being sought is temporary, for 42 years from the date of any DCO consent granted for the Project. At the end of this period, all above ground infrastructure (excluding the NGET substation) and equipment will have been removed, along with the cables beneath the main solar

arrays, with the land continuing in agricultural use. Cables located beneath the public highway are not proposed to be removed following the end of the period of consent.

1.2 Purpose of this Report

- 1.2.1 On 13 December 2024, the Examining Authority (ExA) published section 51 advice to the Applicant [**PD-003**] (the “S51 Advice”). This included a request from the ExA for the Applicant to update certain plans as submitted with the DCO Application.
- 1.2.2 In response to the S51 Advice, the Applicant submitted a suite of documents on 31 January 2025 [**AS-001**] to [**AS-026**] (the “S51 Response”). This addressed the updates requested by the ExA in its S51 Advice, as well as capturing further amendments to the DCO Application documents that the Applicant intends to make to the Project.
- 1.2.3 In its Cover Letter [**AS-001**] submitted with the S51 Response, the Applicant notified the ExA of its intention to make those minor changes to the DCO Application. In accordance with Planning Inspectorate (PINS) guidance ‘Changes to an application after it has been accepted for examination (August 2024)’ (the “PINS Guidance”), that cover letter constitutes a notification of the Applicant’s intention to formally submit a request for a change to the DCO Application (the “Change Notification”).
- 1.2.4 In summary, the two changes relate to:
- a. **Change 1:** Small reduction in redline (0.015 ha) to remove an access; and
 - b. **Change 2:** Replacement of two areas of solar installation for further archaeological protection and management (0.47 ha).
- (the “Proposed Changes”)
- 1.2.5 In its letter dated 5 March 2025 [**PD-005**], the ExA requested that the Applicant submits a formal change request in respect of Change 1 and Change 2 (the “Change Advice”).
- 1.2.6 The purpose of this report is to comprise the formal change request application (the “Change Request”). As recognised by the ExA in its Change Advice, in this report the Applicant cross-refers to the updated documents submitted with the S51 Response instead of re-submitting those documents alongside this Change Request, as this would unnecessarily duplicate application documents. Table 5-1 lists all of the documents relied upon for this Change Request, including those documents submitted with the S51 Response and any new documents submitted alongside this Change Request.
- 1.2.7 No additional land outside the Order Limits is required and so the Proposed Changes do not necessitate any additional Compulsory Acquisition relating to new plots of land and/or interests.
- 1.2.8 Further, neither of the Proposed Changes are expected to result in any new or different likely significant environmental effects compared to those effects reported in the submitted Environmental Statement.

Section 3.5 of this Report includes environmental information that confirms this conclusion.

1.2.9 **Appendix A** of this Change Request illustrates the location of the Proposed Changes in relation to the Order Limits as submitted with the original application. The redline boundary from the initial application is shown on the Site Location & Order Limits Overview [APP-059], with the updated redline boundary shown in the Location Plan [AS-024].

1.2.10 This report (and/or the supporting documents submitted as part of this Change Request), sets out the information required for change requests in accordance with the PINS Guidance, '*Changes to an application after it has been accepted for examination*'. It also details the engagement the Applicant has undertaken with relevant Affected Parties and Statutory Undertakers that informed the submission of the Change Request and provides an overview of the approach to consultation in respect of the Change Request.

1.3 Structure of this Report

1.3.1 The subsequent sections of this report are set out as follows:

- Section 2: Description of Changes and Rationale for the Change Request;
- Section 3: Legislative and Policy Context for the Change Request;
- Section 4: Consultation / Notification;
- Section 5: Schedule of Revised Application Documents; and
- Section 6: Conclusion.

2 Description of Changes and Rationale

2.1 Introduction

2.1.1 The Proposed Changes are detailed below.

Change 1 - Reduction in redline (0.015 ha)

2.1.2 The Applicant has removed a small area of land (identified as plot 6-17 in the Book of Reference [APP-023] submitted with the application) amounting to 0.015 ha from its redline boundary. All of the plans submitted along with the Applicant's S51 Response were updated to capture this redline boundary change. For example, see Sheet 6 of the updated Land Plans [AS-006] and Sheet 6 of the updated Works Plans [AS-005] which no longer include plot 6-17. **Appendix A** of this Change Request Report illustrates the location of the Proposed Changes in relation to the Order Limits, as discussed at paragraph 1.2.9 above.

Change 2 - Replace two areas of solar installation for further archaeological protection and management (0.47 ha)

2.1.3 The Applicant has also reduced its area of proposed solar installation in two areas and instead proposes to provide further archaeological protection and management instead. The first area measures 0.3 ha and the second area measures 0.17 ha only, resulting in a total affected area of 0.47 ha. **Appendix A** of this Change Request illustrates the location of the Proposed Changes in relation to the Order Limits.

2.2 Need and Rationale for the Changes

Change 1 - Reduction in redline (0.015 ha)

2.2.1 Initially, the Applicant was seeking to obtain construction and operational access to two fields to the West and South of Mill Farm. However, the owners of Mill Farm asked the Applicant not to use this access as it crossed the Mill Farm access road and required the widening of a hedgerow. After ongoing engagement with the owners of Mill Farm, the Applicant reviewed its other options in more detail and decided to remove this access (plot 6-17), as there is a suitable alternative further south on Lower Road. This offered unimpeded access to the northerly most fields using breaks in the existing hedgerows. This alternative access is shown on Sheet 8 of the Streets, Access and Rights of Way Plans [AS-004] and on Figure 2.2D (Central Site Area 4 of 6) of the Illustrative Masterplan [AS-020]. This alternative access is already facilitated as part of the existing DCO Application and has the added benefit of avoiding further hedgerow loss that may otherwise have arisen if plot 6-17 was retained. A further analysis of the environmental benefits arising from this change are captured in section 3.5 of this Report.

Change 2 - Replace two areas of solar installation for further archaeological protection and management (0.47 ha)

- 2.2.2 RPS, on behalf of the Applicant, has agreed with the County archaeologist that, in its identification and evaluation of buried heritage assets, if important archaeology was identified, the Applicant would agree not to place solar arrays or other infrastructure in that location. In other words, the project layout would change to prioritise the protection of that asset. Confirmation of this is set out in paragraphs 7.9.7 and 7.9.15 of ES Chapter 7: Historic Environment [APP-044], which respectively describe how the protective measures would be applied during construction and operation of the Project. This approach is also described in the Outline Written Scheme of Investigation [APP-237] (noting an updated version of this document is submitted as part of this Change Request).
- 2.2.3 Change 2, therefore, simply extends the approach taken by the Applicant during pre-application and is agreed in principle with the County archaeologist. This alteration has therefore been reflected in the updated Illustrative Masterplan [AS-020] documents, Operational Development Areas Plan [AS-021] and Works Plans [AS-005] submitted with the Applicant's s51 Response. Most notably, see Sheet 6 of the Works Plans [AS-005] where the relevant areas affected by this change have had Work Nos. 1 (solar installation) and Work Nos. 6 (cabling and other miscellaneous works) replaced by Work No. 5 (archaeological protection).
- 2.2.4 For completeness, the removal of solar panels in these small areas of land will not alter the position any Power Converter Stations or other electrical infrastructure.

2.3 Materiality

- 2.3.1 In respect of changes to DCO applications that are proposed during the course of examination, there is no statutory definition as to whether a proposed change is "non-material" or "material". The Planning Act 2008 (PA 2008) does not define what is a non-material or material change, and the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the "Changes Regulations") (The Stationary Office, 2011) (which apply to proposed changes to made DCOs only) set out the process and procedure which needs to be followed in seeking a change.
- 2.3.2 Guidance on Changes to Development Consent Orders published by the Department for Communities and Local Government (DCLG, 2015) in 2015 (the "2015 Guidance"), whilst of some relevance, only relates to dealing with changes to DCOs made under the Changes Regulations (i.e. once a DCO has been granted). Paragraph 10 of this guidance does state that a decision around materiality "*will inevitably depend on the circumstances of the specific case.*"
- 2.3.3 The 2015 Guidance (DCLG, 2015) sets out circumstances where a change to a DCO could be a material change. These include where there

may be a change in significant environmental effects, may result in the need for a Habitats Regulation Assessment, would require the acquisition of additional land or result in new land interests, or impact upon local people or businesses not previously identified. These are expressly referred to as a “starting point” only for assessing the materiality of a change.

- 2.3.4 Noting that the 2015 Guidance does not apply directly to this Change Request, applying by analogy and having regard to the above, the matter of materiality is therefore a matter of judgement that needs to be applied on a case-by-case basis, depending on the extent of additional considerations (i.e. those not considered or assessed as part of the original DCO application) that may arise as a result of a proposed change.
- 2.3.5 In this case, Change 1 relates to the discrete removal of a limited area of land from the Project following engagement with the landowner and Change 2 relates to a small reduction in solar installation area as a result of further design iteration relating to archaeological protection.
- 2.3.6 These changes are not material, involving a reduction of the Order Limits and would not impact on additional land interests not previously identified, and a small change to the area of solar arrays in favour of archaeological protection and management. Therefore, the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations) (The Stationery Office, 2010) are not engaged.
- 2.3.7 The ExA’s Change Advice confirms this position:
“The ExA notes that the proposed changes seek to respond to concerns raised by landowners and to improve archaeological protection. Each potential change is relatively contained in scope and appears to relate to site-specific matters raised. In light of the above considerations, the ExA is satisfied that the proposed changes, whether considered individually or taken together, would not be so substantial as to amount to a materially different project from that which was applied for.”
- 2.3.8 The Change Request is supported by an environmental appraisal of Change 1 and Change 2, as set out in section 3.5 of this report. This confirms that the Proposed Changes will not result in any new or different significant effects compared to those reported within the ES **[APP-036 to APP-224]** submitted with the DCO Application.
- 2.3.9 In addition, the Change Request would not impact upon any consents or licences for the project with these remaining as set out in the Consents and Licences Required Under Other Legislation **[APP-035]**.
- 2.3.10 In view of the above, it is clear that the Proposed Changes are non-material, resulting in the Project being materially no different to that described and assessed in the DCO Application and accepted for examination, which would not give rise to any materially new or different effects or involve the inclusion of additional land.

3 Legislation and Policy Context

3.1 The Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (2024)

- 3.1.1 The guidance set out in the Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects, 2024 (the “Examination Guidance”) (MHCLG, 2024) includes matters which relate to the Change Request and has therefore been given due regard by the Applicant.
- 3.1.2 The Examination Guidance outlines an expectation that applications will be as well prepared as possible prior to submission, but notes that “..there are occasions when applicants may wish to make changes to an application after it has been accepted for examination..”.
- 3.1.3 It is stated within the Examination Guidance (at Paragraph 018 Reference ID-07-018-20240430) that the Examining Authority is required to consider a number of factors when deciding whether to accept an applicant’s proposed changes, such as whether:
- a. “the changes would mean the project is effectively a different one from that contained in the application”. The Proposed Changes are non-material in nature resulting in one minor reduction of the Order Limits and minor refinements to the proposed Project layout. In terms of the scope and extent of changes proposed, the effect of the proposed changes would not be so substantial as to constitute a materially different project to the Project as submitted with the DCO Application.
 - b. “the application (as changed) is still of a sufficient standard for examination”. As the Proposed Changes are non-material and will not result in a materially different proposal, the DCO Application is still of a sufficient standard for examination with the Change Request being supported by updated documents, where relevant, produced to a sufficient standard.
 - c. “sufficient consultation on the changed application can be undertaken to allow for the examination to be completed within the statutory timetable”. The Applicant is submitting this Change Request prior to the examination period commencing and, given no new or materially different environmental effects have arisen compared to those already reported within the Environmental Statement [APP-036] to [APP-224], does not consider further targeted consultation to be required. This is supported by the ExA’s Change Advice, which states that “Our current view, subject to the contents of the environmental information accompanying the change request, is that further public

consultation may not be required.” Therefore, this Change Request is not anticipated to impact the statutory timetable, and interested parties will have the opportunity to consider and comment on the Proposed Changes through the examination process. In support of this approach, the Applicant has provided advance notification of this Change Request to relevant parties including host local authorities, host parish councils, Historic England and relevant land interests.

- d. *“the changes would breach the principles of fairness and reasonableness for parties participating in the examination”*. The Applicant has determined that the majority of previous consultees will not be impacted by the Proposed Changes, beyond the impacts already assessed and consulted on as part of the DCO Application.

On this basis, and in recognition of the view that further public consultation is not required, a more targeted notification exercise in respect of the Change Request has been carried out as described in section 0 of this report.

- e. *“Any other procedural requirements can still be met”*. Due to the early submission of the Change Request prior to the Preliminary Meeting and examination commencing, there is sufficient time for any other procedural requirements to be met with no impact on statutory timescales for the examination of the DCO Application.

3.2 **Nationally Significant Infrastructure Projects: Advice Pages – Changes to an Application after it has been accepted for Examination (PINS, August 2024)**

- 3.2.1 In considering the scale and nature of the Change Request, the Applicant has had regard to the Government’s Nationally Significant Infrastructure Projects: Advice pages, in particular, the advice page for *‘Changes to an application after it has been accepted for examination’* (referred to previously and hereafter as the “PINS Guidance”) (PINS, 2024).
- 3.2.2 The Applicant continues to engage with landowners and statutory undertakers in relation to the Project. The PINS Guidance recognises that the need for a change request may result from *“on-going negotiations between the applicant and other interested parties”*, as has been the case in relation to the Proposed Changes. Specifically, Change 1 has been informed through ongoing negotiation with the relevant land interest. This resulted in the identification of an alternative access meaning the land in question is no longer required for the Project. Specifically for Change 2, the Applicant’s historic environment consultant has continued to liaise with the Archaeology Team Leader at Oxfordshire

County Council. The removal of panel areas was discussed during site meetings to review ongoing trial trenching. A description of this engagement is described in Section 4 of this Change Request Report.

- 3.2.3 The PINS Guidance sets out a number of steps required as part of the process for requesting a change to a DCO application. These are set out below, along with how the Applicant has complied with each of these steps.

Step 1 –The change notification

- 3.2.4 The PINS Guidance states that where a request for a change to an application is made, which has already been accepted for examination, the applicant must inform the ExA in writing. The Project was accepted for examination on 15 December 2024, and as part of the S51 Response, the Applicant notified the ExA of the Proposed Changes within the accompanying cover letter [AS-001] (the “Change Notification”).

- 3.2.5 The PINS Guidance identifies the information to be included in a change notification, including:

- a. A clear description of the proposed change, including any new works, altered works and ancillary matters.
- b. A statement setting out the reasons and need for making the change to the application with reference to the government’s guidance on the Examination stage, any relevant National Policy Statements, and any other important and relevant matters.
- c. A statement establishing whether the proposed change involve changes to the Order land.
- d. A statement establishing whether the proposed change is expected to result in any new or different likely significant environmental effects. This should include a summary description of those effects and any mitigation proposed.
- e. Information to establish how the Applicant considers the proposed change can be accommodated within the remaining statutory timescales.
- f. The timescale for the Applicant’s consultation about the proposed change, and the Applicant’s view on the scope of that consultation, including justification.
- g. The expected submission date for the Change Request, which was confirmed to be no later than 19 March 2025.

- 3.2.6 The Applicant has complied with the above PINS Guidance by including the majority of the information set out above. The Applicant did not set

out an expected submission date for this Change Request, on the basis that the Applicant did not consider a formal Change Request to be necessary given the minor and localised nature of the Proposed Changes. However, the Change Advice recognises that the S51 Response [AS-001] as being the ‘notification letter’ for the purposes of the PINS Guidance.

Step 2 – Advice from the Examining Authority

- 3.2.7 The PINS Guidance states that, after considering the change notification, the ExA will provide advice to the applicant about the procedural implications of the proposed change, including the need, scale, and nature of consultation that the applicant should undertake before formally submitting the change application.
- 3.2.8 The ExA published its response to the Change Notification as part of its ‘letter to the Applicant and Interested Parties relating to a Change Request submitted with s51 Advice following Acceptance Response’ [PD-005].

Step 3 – The applicant consults about the proposed changes

- 3.2.9 The PINS Guidance states that the applicant should carry out ‘appropriate’ consultation about the proposed change, where the applicant should consult all those persons prescribed under section 42(1)(a) to (d) of the Planning Act 2008 who would be affected by the proposed change, giving a minimum of 28 days from receipt of the information about the proposed change for responses.
- 3.2.10 The PINS Guidance allows for a targeted approach to the identification of those affected by the proposed change to be adopted. Where this approach is taken, detailed justification should be provided about why the applicant considers it is not necessary to consult all the prescribed persons.
- 3.2.11 The Applicant is submitting this Change Request prior to the examination period commencing and, given no new or materially different environmental effects have arisen compared to those already reported within the Environmental Statement, does not consider targeted consultation to be appropriate or required. Therefore, it is not anticipated to impact the statutory timetable, and interested parties will have the opportunity to consider and comment on the proposed changes through the examination process. In support of this, the Applicant has provided advance notification of this change request to relevant parties including host local authorities, host parish councils, Historic England and relevant land interests. This aligns with the interested parties that would ordinarily be consulted under section 42 of the PA 2008 where consultation is considered appropriate.
- 3.2.12 Section 4 of this Report outlines the Applicant’s approach to notification in relation to the Change Request in more detail.

Step 4 – The change application

- 3.2.13 The PINS Guidance sets out that a formal request must be made by the applicant to the ExA to change the application by providing the required information.
- 3.2.14 The PINS Guidance sets out the information that should be included within a change request. **Table 3.1** below sets out the information required, and where this can be found within this report and supporting documentation.

Table 3.1: Information required for the Change Request

Information / Requirement	Location of Information
Confirmed / Updated description of the changes	Section 2 of this Report
Confirmed / Updated rationale for the changes	Section 2 of this Report
Full schedule of application documents / revisions	Section 6 of this Report sets out the documents that have been updated as a consequence of this Change Request. The updated Guide to the Application submitted alongside this Change Request contains the full list of updated documents, with those documents that have been updated as a result of the Change Request clearly shown.
Statement identifying any impact the Proposed Changes would have on securing any consents or licences for the Project	Section 2 of this Report
Clean and track changed versions of the draft DCO and Explanatory Memorandum	Clean and tracked changed versions of the draft DCO [AS-009] and draft Explanatory Memorandum [AS-011] were submitted alongside the Change Notification as part of the S51 Response.

Information / Requirement	Location of Information
Confirmation that Compulsory Acquisition Regulations are not engaged	Section 2.3 of this report outlines the non-material nature of the Proposed Changes and confirms that the Compulsory Acquisition Regulations (The Stationery Office, 2010) are not engaged.
If there are any new or different likely significant environmental effects, provision of other environmental information and confirmation that, effects have been adequately addressed; and copies of any responses from consultation bodies who may have an interest in the proposed changes.	<p>As the Proposed Changes would not result in any new or different significant environmental effects, this requirement is not engaged. Section 3.5 of this report provides a review of Environmental Assessments of the ES and whether the minor alterations alter the contents of the ES leads to any new or different likely significant effects.</p> <p>Further information on the consultation undertaken as a result of the Change Request is detailed in Section 4 of this Report.</p>

3.3 Relevant Planning Policy

3.3.1 The Applicant has considered relevant planning policy and guidance alongside the Change Request and considers the Proposed Changes to be in accordance with:

- a. Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security & Net Zero, 2023a);
- b. National Policy Statement for Renewable Energy Infrastructure (EN-3) (Department for Energy & Net Zero, 2023); and
- c. National Policy Statement for Electricity Networks Infrastructure (EN- 5); (Department for Energy Security & Net Zero, 2023b)

Early Engagement

3.3.2 Paragraph 4.1.19 of NPS EN-1 acknowledges the importance of early engagement at the pre-application stage between the Applicant, key stakeholders, statutory consultees and others likely to have an interest in the application. While this refers to the pre-application stage of the DCO application and not the pre-examination stage of a change request, the Applicant considers it important and relevant to note that the rationale for the Change Request has arisen due to continued engagement largely with Affected Parties to enable voluntary agreement to be reached in relation to the acquisition of land and interests. This proactive approach to engagement is intended to support the examination process.

3.3.3 The proposed refinements in the Change Request have been informed by engagement with the relevant landowner and county archaeologist, and have been designed in response to their feedback.

3.3.4 The Applicant has provided advance notification of this Change Request to relevant parties including host local authorities, host parish councils, Historic England and relevant land interests.

Obtaining Land by Negotiation

3.3.5 As set out in the CA Regulations (The Stationery Office, 2010) the Applicant should only seek compulsory acquisition of land where it does not succeed in reaching a voluntary agreement through negotiations with landowners.

3.3.6 Change 1 has arisen from on-going discussions with Affected Parties and are the result of negotiations seeking to secure land through voluntary agreement. This is in line with paragraph 2.6.2 of NPS EN-5 (Department for Energy Security & Net Zero, 2023b), which states “*where the Applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work*”.

Flexibility in the Project Details

3.3.7 NPS EN-3 (Department for Energy & Net Zero, 2023) recognises the importance of flexibility in proposals as “*not all aspects of the proposal may have been settled in precise detail at the point of application*”. The Change Request is the result of ongoing engagement with Affected Parties and Statutory Undertakers to continue to settle issues and make amendments to the Project that were not settled at the time of submission of the DCO Application. The Change Request does not change the approach to design flexibility in relation to the Project.

3.4 Compulsory Acquisition Regulations

3.4.1 For the avoidance of doubt, as the Proposed Changes relate to the removal of land and the reduction or modification of the Order Limits, with no ‘additional land’ included, the CA Regulations (The Stationary Office, 2010) are not engaged.

3.4.2 Since the Proposed Changes are either reductions of the Order Limits or minor refinements of the Project layout, thereby not impacting on the extent of the Order Limits, there is no new Category 3 land as defined by section 57 of the PA 2008. Given this, there are no new claimants as a result of the Change Request and no new or different significant effects arising from the Proposed Changes to enable a relevant claim to be made.

3.5 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

3.5.1 The Applicant has submitted supporting environmental information in this section of the Report to review whether the Proposed Changes leads to

any new or different likely significant effects already assessed in the Environmental Statement. As set out below, there are no new or different likely significant effects associated with the Change Request, therefore the conclusions of the ES [APP-036 to APP-224] submitted with the DCO Application remain valid and unchanged.

- 3.5.2 This section does not constitute “further information” for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’). This is because the Proposed Changes are not likely to result in any new or different significant effects, such that it is not relevant to the ExA’s ability to reach a reasoned conclusion on the significant effects of the Project (as per Regulation 3 of the EIA Regulations).
- 3.5.3 The Applicant notes there is no statutory requirement to consult on this, including in respect of the consultation requirements under Regulation 20 of the EIA Regulations (The Stationary Office, 2017).
- 3.5.4 Further to this, the PINS Guidance states: “If the proposed change results in any new or different likely significant environmental effects, provision of other environmental information and confirmation that:
- a. the effects have been adequately assessed and that the environmental information has been subject to publicity. Whilst not statutorily required, the publicity should reflect the requirements of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and applicants should also submit copies of any representations received in response to this publicity with the change request.
 - b. any consultation bodies who might have an interest in the proposed changes have been consulted (reflecting the requirements of the EIA Regulations). Applicants should submit copies of any responses received from consultation bodies with the Change Application. Applicants should identify those consultation bodies who were consulted on the proposed changes but not on the original application”.
- 3.5.5 The Applicant has concluded that no new or materially different environmental effects have arisen compared to those already reported within the Environmental Statement and therefore has not undertaken further targeted consultation.
- 3.5.6 Additionally, the Applicant has submitted the Change Request before the Preliminary Meeting and the commencement of the examination thereby allowing Interested Parties and others the opportunity to consider the implications of the Proposed Changes before the start of the examination.
- 3.5.7 A review of whether the minor alterations alter the contents of the ES has been undertaken across all ES chapters, as summarised in **Table 3.2**.

3.5.8 **Appendix A** of this Change Request illustrates the location of the Proposed Changes in relation to the Order Limits shown in the Location Plan [**AS-024**].

Table 3.2: Review of Environmental Assessments

Chapter / Technical Assessment	Review of whether new or materially different likely significant effects would arise as a result of the Project
Chapter 1: Introduction	The revised areas of the Project result in a total affected area of 0.47 ha so, taking into consideration these minor alterations, the site remains at approximately 1,418ha and the installation area of solar panels remains approximately 839 ha (to the nearest whole number) for the purposes of the overall description. The minor alterations do not introduce any other changes to Chapter 1: Introduction of the ES [APP-038].
Chapter 2: Existing Baseline	The minor changes set out in this Change Request do not introduce any changes to the existing baseline described in Chapter 2: Existing Baseline of the ES [APP-039].
Chapter 3: Consenting and Consulting Process	The minor changes set out in this Change Request do not introduce any changes to the consenting and consulting process described in Chapter 3: Consenting and Consulting Process of the ES [APP-040].
Chapter 4: Approach to Environmental Assessment	The minor changes set out in this Change Request do not introduce any changes to the EIA methodology described in Chapter 4: Approach to Environmental Assessment of the ES [APP-041].
Chapter 5: Alternatives Considered	The minor changes set out in this Change Request do not introduce any changes to the existing baseline described in Chapter 5: Alternatives Considered of the ES [APP-42].
Chapter 6: Project Description	The revised areas of the Project result in a total affected area of 0.47 ha so, taking into consideration these minor alterations, the site remains at approximately 1,418ha and the installation area of solar panels remains approximately 839 ha (to the nearest whole number) for the purposes of the overall description. The minor alterations do not introduce any other changes to Chapter 6: Project Description of the ES [APP-043].
Chapter 7: Historic Environment	The minor changes set out in this Change Request would not result in any new or materially different significant effects for Chapter 7: Historic Environment of the ES [APP-044]. An updated version of this chapter has been submitted alongside this Change Request to ensure that it refers to a total of 44 areas of land within the Project Site (as opposed to 42, as initially applied for), as a result of Change 2.
Chapter 8: Landscape and Visual Impact Assessment	The minor alterations to the Project, as set out at section 2, have been reviewed in respect of the submitted Landscape and Visual Impact Assessment. It is noted that the northernmost alteration, within Change 2, resulting in the removal of approximately 0.30ha adjacent to the A4095, is in proximity to Representative Viewpoint 19. The removal of this small area of panels would result in a slight reduction in the number of panels visible from this location. However, it is considered that this reduction would not materially affect the overall assessment of significance identified within the LVIA. The southernmost area of panels removed withing Change 2, located to the south of Cassington Road,

Chapter / Technical Assessment	Review of whether new or materially different likely significant effects would arise as a result of the Project
	<p>would not be discernible from the road, with panels closest to it remaining. Therefore, this minor alteration would similarly not materially affect the overall assessment and conclusions within Chapter 8: Landscape and Visual Impact Assessment of the ES [APP-045]. The alterations associated with Change 1 would not materially affect the overall assessment and conclusions of Chapter 8: Landscape and Visual Impact Assessment of the ES [APP-045].</p>
Chapter 9: Ecology and Nature Conservation	<p>The minor changes set out in this Change Request would not result in any new or materially different significant effects for Chapter 9: Ecology and Nature Conservation of the ES [APP-046]. The increase in archaeological protection areas will increase the area of habitat managed for breeding/wintering birds slightly but this would not be material to the overall assessment of effects. Bearing in mind the ExA's comment on Habitat Regulations Assessment, our assessment does not highlight any change in impacts.</p>
Chapter 10: Hydrology and Flood Risk	<p>The minor changes set-out in this Change Request have been reviewed in terms of hydrology and flood risk. Our review has identified that the proposed minor alterations to the Proposed Development will not result in any significant changes to the assessment. There will be a reduction in built footprint, associated with Change 2, due to a reduction in solar panels, as such the assessment submitted provides a conservative assessment of hydrology and flood risk, as described in Chapter 10: Hydrology and Flood Risk of the ES [APP-047]. Bearing in mind the ExA's comment on Water Framework Directive, our assessment does not highlight any change in impacts.</p>
Chapter 11: Ground Conditions	<p>The minor changes set out in this Change Request have been reviewed in terms of ground conditions and would not result in any new or materially different significant effects for Chapter 11: Ground Conditions of the ES [APP-048].</p>
Chapter 12: Traffic and Transport	<p>The minor changes set out in this Change Request would not result in any new or materially different significant effects for Chapter 12: Traffic and Transport of the ES [APP-049].</p>
Chapter 13: Noise and Vibration	<p>The minor changes set-out in this Change Request have been reviewed in terms of noise and vibration. Our review has identified that the proposed minor alterations to the Proposed Development will not result in any significant changes to the assessment. As such, there are no new or different effects with regards to noise and vibration, as described in Chapter 13: Noise and Vibration of the ES [APP-050]. Furthermore, no changes are required to the Outline Code of Construction Practice [APP-232 and APP-233] which includes the Outline Construction Traffic Management Plan as Annex A.</p>
Chapter 14: Climate Change	<p>The minor changes set out in this Change Request have been reviewed in terms of ground condition sand would not result in any new or materially different significant effects for Chapter 14: Climate Change of the ES [APP-051].</p>
Chapter 15: Socio Economics	<p>The minor changes set out in this Change Request have been reviewed in terms of socio economics and would not result in any new or</p>

Chapter / Technical Assessment	Review of whether new or materially different likely significant effects would arise as a result of the Project
	materially different significant effects for Chapter 15: Socio Economics of the ES [APP-052].
Chapter 16: Human Health	The minor changes set out in this Change Request have been reviewed in terms of human health and would not result in any new or materially different significant effects for Chapter 16: Human Health of the ES [APP-053].
Chapter 17: Agricultural Land Use and Public Rights of Way	The minor changes set out in this Change Request have been reviewed in terms of land use and recreation and would not result in any new or materially different significant effects for Chapter 17: Agricultural Land Use and Public Rights of Way of the ES [APP-054].
Chapter 18: Waste and Resources	The minor changes set out in this Change Request have been reviewed in terms of waste and resources and would not result in any new or materially different significant effects for Chapter 18: Waste and Resources of the ES [APP-055].
Chapter 19: Air Quality	The minor changes set-out in this Change Request have been reviewed in terms of Air Quality. Our review has identified that the proposed minor alterations to the Proposed Development will not result in any significant changes to the assessment. As such, there are no new or different effects with regards to Air Quality, as described in Chapter 19: Air Quality of the ES [APP-056].
Chapter 20: Cumulative Effects and Inter-relationships	The minor changes do not introduce any changes to Chapter 20: Cumulative Effects and Inter-relationships of the ES [APP-057].
Chapter 21: Summary of Significant Effects	The minor changes do not introduce any changes to Chapter 21: Summary of Significant Effects of the ES [APP-058].
Appendix 4.4: Glint and Glare Study inc. Technical Aerodrome Safeguarding Report	The minor changes in the Change Request have been reviewed with relation to Glint and Glare and the Technical Aerodrome Safeguarding Report, due to the close proximity to sensitive receptors. Our review has identified that the changes will not result in any significant changes to the assessment results and conclusions in Appendix 4.4. [APP-128].
Outline Written Scheme of Investigation	Paragraph 1.6.1 of the Outline Written Scheme of Investigation [APP-237] refers to a total of 42 areas of land within the Project Site having been excluded from development activities due to the presence of significant archaeological remains. The acceptance of proposed Change 2 would mean that this total would be increased from 42 to 44.
All other Management Plans, Figures and Appendices	The minor changes do not introduce any changes to any other outline management plans, figures or appendices submitted with the DCO Application.

4 Engagement

4.1 Introduction

- 4.1.1 This section provides an overview of the engagement undertaken by the Applicant to inform the Proposed Changes, in addition to engagement undertaken to prepare relevant consultees for the submission of this Change Request.

4.2 Engagement in respect of Change 1

- 4.2.1 The Applicant has continued to engage with the relevant Affected Parties throughout the pre-application and pre-examination process.
- 4.2.2 With regard to Change 1, the Applicant and its Land Agent have consulted with the Land Interests through the consultation process. However, through the negotiation process it was evident an agreement would not be reached and an alternative access was sought and identified. It was therefore determined that the land in question was no longer required for the Project and could be removed. The Land Interests, including all Category 1 and Category 2 rights holders over Plot 6-17 of the Land Plans [AS-006] and Book of Reference [AS-017] have been informed of the removal of the area of land from the Order Limits.

4.3 Engagement in respect of Change 2

- 4.3.1 The Applicant has also continued to engage with relevant local authority and heritage consultees throughout the pre-application and pre-examination process.
- 4.3.2 During this engagement, RPS agreed with the County archaeologist that, in its identification and evaluation of buried heritage assets, if important archaeology was identified, the Applicant would agree not to place solar arrays or other infrastructure in that location. In other words, the project layout would change to prioritise the protection of that asset. Confirmation of this is set out in paragraphs 7.9.7 and 7.9.15 of ES Chapter 7: Historic Environment [APP-044], which respectively describe how the protective measures would be applied during construction and operation of the Project. This approach is also described in the Outline Written Scheme of Investigation [APP-237] (noting an updated version of this document is submitted as part of this Change Request).

4.4 Engagement to provide advance notice of this Change Request

- 4.4.1 The Applicant has provided advance notification of this change request to relevant parties including host local authorities, host parish councils, Historic England and relevant land interests. This notification included an explanation of the

- 4.4.2 On 13 March 2025, the Applicant notified the following parties by email of their intention to submit this Change Request Report on 19 March:
- a) Oxfordshire County Council;
 - b) West Oxfordshire District Council;
 - c) Cherwell District Council;
 - d) Vale of White Horse District Council;
 - e) Long Hanborough Parish Council;
 - f) Bladon Parish Council; and
 - g) Historic England
- 4.4.3 On 14th March 2025 and 17th March 2025, the Applicant notified the following land interests on their intention to submit this Change Request Report on 19 March:
- Roderick William Cameron Cooke and Christine Mary Cooke;
 - BT Group PLC;
 - Gigaclear Limited;
 - Openreach Limited;
 - Built in Solutions;
 - Edgeband.co.uk;
 - Openreach Limited;
 - Scottish and Southern Energy Power Distribution Limited;
 - Perdiswell Limited;
 - Oxfordshire County Council; and
 - Thames Water Utilities Limited
- 4.4.4 Given the timing of the submission of this Change Request, that no new or materially different environmental effects have arisen compared to those already reported within the Environmental Statement, and that the proposed changes have been informed by engagement with relevant stakeholders, the Applicant does not consider further targeted consultation to be required at this stage.

5 Updated Application Documents

- 5.1.1 As a result of the Proposed Changes, the following documents in **Table 5.1** are referenced as part of the Change Request. These comprise updated DCO application documents and new documents as submitted with the Applicant's S51 Response. Both tracked and clean versions of the updated documents were submitted with the S51 Response along with a full schedule of all documents and plans, including revision numbers, to enable the ExA and Interested Parties to identify the updates that have been made from the previous iteration of the documents submitted with the Application. This is in accordance with advice set out in the PINS Guidance.
- 5.1.2 The schedule of the latest updated and new documents and plans is included within the updated Guide to the Application submitted alongside this Change Request. This provides a full schedule of documents, both latest and superseded. Any superseded documents are shaded grey. Where no revisions are proposed to a document, the relevant section of the Guide remains unchanged.

Table 5.1: Documents relevant for this Change Request

Doc No.	Document Name	Changes made since previous version
	Guide to the Application – Rev 2	Updated to show superseded versions of documents and any new documents.
AS-024	Location Plan – Rev 1	Updated to show new Order Limits.
AS-021	Operational Development Areas Plan – Rev 1	Updated to show new Order Limits.
AS-022	Landscape, Ecology and Amenities Layer Plan – Rev 1	Updated to show new Order Limits.
AS-023	Temporary Facilities Overview Plan – Rev 1	Updated to show new Order Limits.
AS-006	Land Plans – Rev 1	Updated to show new Order Limits.
AS-009 and AS-010	Draft Development Consent Order (Clean and Tracked) – Rev 1	Updated to remove Plot 6-17 (Change 1). No changes required for Change 2 to have effect.
AS-025	Schedule of Changes to the Draft Development Consent Order	Submitted to explain the changes made to the Development Consent Order.
AS-011 and AS-012	Explanatory Memorandum (Clean and Tracked) – Rev 1	No changes required for Change 1 or Change 2.
AS-017 and AS-018	Book of Reference (Clean and Tracked) – Rev 1	Updated to remove Plot 6-17. No changes required for Change 2 to have effect.

Doc No.	Document Name	Changes made since previous version
AS-026	Schedule of Changes to the Book of Reference	Submitted to explain the changes made to the Book of Reference.
AS-013 and AS-014	Land and Rights Negotiation Tracker (Clean and Tracked) – Rev 1	Updated to show latest status of the negotiations.
AS-019	Figure 1.2 Illustrative Masterplan Overview – Rev 1	Updated to show new Order Limits.
AS-020	Figures 2.1a - 2.4c - Illustrative Masterplan – Rev 1	Updated to show new Order Limits.
AS-007	Hedgerow Removal Plans – Rev 1	Updated to show new Order Limits.
AS-004	Streets, Access and Rights of Way Plans – Rev 1	Updated to show new Order Limits.
AS-005	Works Plans – Rev 1	Updated to show new Order Limits.
AS-008	Traffic Regulation Measures Plans – Rev 1	Updated to show new Order Limits.
EN010147/APP/6.3 (updated Examination Library Reference TBC)	ES Chapter 7: Historic Environment	Table 7.5 updated to reflect increased number of areas (from 42 to 44) excluded from development activities in order to avoid impacts on significant archaeological remains.
EN010147/APP/ 7.6.5 (updated Examination Library Reference TBC)	Outline Written Scheme of Investigation	Paragraph 1.6.1 updated to reflect increased number of areas (from 42 to 44) excluded from development activities in order to avoid impacts on significant archaeological remains.

5.1.3 This Change Request Report (EN010147/APP/9.1) is a new submission and document refs EN010147/APP/6.3 (ES Chapter 7: Historic Environment) and EN010147/APP/ 7.6.5 (Outline Written Scheme of Investigation) are newly updated documents, not previously submitted as part of the Applicant's S51 Response on 31 January 2025. All other documents referred to within this report are either application documents or were updated as part of the Applicant's S51 Response. This is set out within the updated Guide to the Application submitted alongside this Change Request submission. This provides a full schedule of documents, both latest and superseded.

6 Conclusion

- 6.1.1 The Proposed Changes are a result of the Applicant's proactive and continued engagement with Affected Parties and Statutory Undertakers. Change 1 is the result of the Applicant's willingness to refine the Order Limits to ensure that only land that is necessary to deliver the Project is included. Change 2 has arisen through further design refinement associated with the protection of underground archaeology.
- 6.1.2 The Proposed Changes are all non-material, resulting in no new or different likely significant effects, as concluded in section 3.5 of the Change Request. The Applicant regards the changes as non-material reductions/refinements of the Order Limits that are unsubstantial in nature. The Proposed Changes are not so substantial as to constitute a materially different Project to that submitted and accepted for examination. The Proposed Changes will not result in a DCO Application that is materially different in character to the one submitted and accepted for examination.
- 6.1.3 The Applicant considers the pre-application engagement undertaken in relation to the Change Request to be appropriate and proportionate to the nature of the Proposed Changes.
- 6.1.4 The Applicant has considered the appropriate approach to bringing forward the Change Request in the context of the requirements of the Examination Guidance (MHCLG, 2024) and PINS Guidance (PINS, 2025). The Applicant considers that the changes can be adequately considered in full by the ExA, and the Change Request decided, prior to the preliminary meeting, such that it will not impinge on the commencement of the examination.
- 6.1.5 The documents listed in Section 5 are referenced in support of this Change Request and the Applicant trusts that this report is useful to the ExA in providing an overview of the scope and nature of the Proposed Changes. The Applicant welcomes confirmation from the ExA that the Change Request can be accepted.

7 References

Department for Communities and Local Government (2015). Planning Act 2008: Guidance on Changes to Development Consent Orders. Available at <https://www.gov.uk/government/publications/changes-to-development-consent-orders>

Department for Energy & Net Zero (2023). National Policy Statement for Renewable Energy Infrastructure (EN-3). Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3>

Department for Energy Security & Net Zero (2023a). Overarching National Policy Statement for Energy (EN-1). Available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

Department for Energy Security and Net Zero (2023b). National Policy Statement for Electricity Networks (EN-5). Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>

Ministry of Housing, Communities and Local Government (2024). Planning Act 2008: Examination Stage for Nationally Significant Infrastructure Project. Available at: Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects - GOV.UK (www.gov.uk)

The Planning Inspectorate (2025). Nationally Significant Infrastructure Projects – Changes to an application after it has been accepted for examination. Available at <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-changes-to-an-application-after-it-has-been-accepted-for-examination>.

The Stationary Office (2008). Planning Act 2008. Available at Planning Act 2008 (legislation.gov.uk) [Accessed on 31 July 2024]

The Stationary Office (2010). The Infrastructure Planning (Compulsory Acquisition) Regulations 2010. Available at: <https://www.legislation.gov.uk/uksi/2010/104/contents/made>

The Stationary Office (2011). The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011. Available at <https://www.legislation.gov.uk/uksi/2011/2055/contents>

The Stationary Office (2017). The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/572/contents/made>

Appendix A: Project Refinements

